

Commonwealth Africa Anti-Corruption Programme Evaluation

February 2017



The Commonwealth

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Commonwealth Africa Anti-Corruption Programme Evaluation

February 2017



The Commonwealth

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Acronyms

AAACA	Association of Anti-Corruption Agencies in Commonwealth Africa
ACA	Anti-corruption agency
BTOR	Back-to-office report
CAACC	Commonwealth Africa Anti-Corruption Centre
CACAP	Commonwealth Anti-Corruption Africa Programme
CFTC	Commonwealth Fund for Technical Cooperation
DCEC	Directorate of Corruption and Economic Crime
DFID	Department for International Development
EAAPAC	Eastern Africa Association of Public Accounts Committees
GDP	Gross domestic product
ICT	Information and communication technology
IMF	International Monetary Fund
IT	Information technology
NGO	Non-governmental organisation
PDD	Project Design Document
PFM	Public financial management
SADCOPAC	Southern African Development Committee Organisation of Public Accounts Committees
TOC	Theory of Change
ToR	Terms of reference
ToT	Training of trainers
UN	United Nations
UNCAC	UN Convention against Corruption

Executive Summary

Introduction

The Commonwealth Secretariat commissioned PFMConnect Ltd to undertake a brief independent evaluation of its Africa Anti-Corruption Programme, including the Commonwealth Africa Anti-Corruption Centre (CAACC) in Botswana.

This study comes at a time when corruption appears to be an issue of increasing concern for member countries. They are becoming sensitive to charges of corruption and elections are being fought on anti-corruption platforms. This, in turn, raises questions about the effectiveness of the Secretariat's support for the anti-corruption measures practised by Commonwealth countries and the ways in which such support could be improved.

This evaluation takes place 5 years after the Commonwealth Anti-Corruption Adviser helped to establish the Association of Anti-Corruption Agencies in Commonwealth Africa (AACACA) and 3 years after the founding of the CAACC in Botswana, a venture funded jointly by the Government of Botswana and the Commonwealth for the capacity development of Commonwealth Africa anti-corruption agencies (ACAs).

Anti-corruption agencies investigate potential cases of corruption and undertake some forms of preventative work. Several agencies also undertake prosecutions. The main focus of most agencies is, undoubtedly, investigation, although they are becoming increasingly involved in the education of the general public and public officials.

The effects of corruption

Bribery is estimated to amount to 2 per cent of global gross domestic product (GDP), and corruption, in its various forms, has been estimated to exceed 10 per cent of GDP in some countries. Statistical research and personal testimony point to a number of serious social and economic problems that arise from corruption, including the following:

- significant reductions in national prosperity;

- denial of economic opportunity to those without the means to offer inducements or who are not prepared to do so (e.g. public procurement);
- Skewing of resources towards the corrupt and their adherents.
- denial or reduction in public services for those without the means to offer inducements or who are not prepared to do so (e.g. health and education);
- reduction in public service efficiency (e.g. the deliberate reduction in performance to elicit bribes to improve delivery);
- denial of fair access to employment (e.g. through nepotism);
- denial of justice by corrupt court officials;
- reduction in respect for state authority leading to public unrest.

Evaluation requirements

This evaluation was designed as an examination of internal collaboration within the Secretariat, the effectiveness of the Botswana Centre and the general scope of the Secretariat's anti-corruption activities, all of which were set in the context of international norms for combating corruption. Recommendations were invited that would inform the next stage of development in these anti-corruption support measures. The specific requirements and the evaluation findings are summarised in the Assessment section below.

Approach to the evaluation

The evaluation was conducted by means of a series of face-to-face interviews with Secretariat advisers, the staff of the CAACC in Botswana, a range of government officials who are responsible for ACAs and other organisations responsible for governance oversight in Botswana, Ghana, Rwanda and Tanzania. Online interviews were also held and correspondence exchanged with the heads of four other Commonwealth Africa ACAs.

In addition, the evaluation included a major online survey of former course participants and a more limited survey of the networking activities of the ACAs.

Findings

The evaluation found that the Botswana Centre has a strong commitment to developing its services. There was, however, a serious uncertainty over future funding because the Secretariat's initial financial support period was coming to an end and other sources of funding have not been established. In particular, the Commonwealth African ACAs have a very unreliable record of paying the fees that were intended to counter the impending funding deficit.

A notable feature of the country visits was the relatively rapid progress made by Rwanda in reducing corruption. It appeared that, at least to some extent, this resulted from a single-minded commitment to defeating corruption that was shared by top politicians and officials. It also appeared to be due to the administrative skills of those same people, the supporting legal, regulatory and institutional frameworks, the robust implementation systems that had been put in place and relentlessly communicating to staff and the general public that corrupt practices were completely unacceptable. There was also a body of senior officials in Botswana who had made significant progress in the field of administrative oversight, and important initiatives were in progress elsewhere.

The extent of collaboration within countries and between them varied significantly. Seychelles was in the process of establishing an anti-corruption agency and it was instructive that it was keen to forge links with other countries to make ground rapidly. The interviews evidenced a wide variety of developments in member countries that could be shared usefully and identified a variety of needs and practices that could be supported by the Botswana Centre in various ways. The online survey supplied impressive evidence of the benefits gained from courses that were held at the Botswana Centre, in terms of personal capacity development and improvements in the operations of ACAs.

In terms of the Secretariat's broader engagement in combating corruption, it was found that, while many aspects of the Secretariat's work witnessed and were hampered by corruption, there was relatively little dialogue or mutual support within

the Secretariat on this agenda. The heavy demand on the Secretariat staff over a very broad range of work tended to result in segmented working arrangements, although the evaluation team considered that there were ways in which more collaborative work on corruption could and should take place; however, it would be necessary to ensure that other essential priorities were not seriously impaired by such arrangements.

Assessment of the Secretariat's anti-corruption initiative

It is clear that the Secretariat has no formal anti-corruption strategy or plan of action. It does, however, have a project design document (PDD) for the Botswana Centre in which a variety of well-articulated ideas and intentions are described. The evaluation team used the PDD as the starting point for our evaluation; otherwise, we have interpreted the activities of the Anti-Corruption Adviser as indicative of implicit programming.

The evaluations outcomes (see Chapter 5) are summarised in the following table.

Recommendations

The Secretariat has developed its support for Commonwealth member countries in Africa in the field of anti-corruption activity by creating the CAACC in Botswana and the AAACA. These institutions are clearly valued but both face serious challenges and require development if they are to satisfy their potential and meet the needs of a very demanding agenda.

This evaluation suggests that it is now appropriate for the Secretariat to give serious consideration to three basic developments: (1) a new form of ownership and governance for the Centre and the Association, involving the ACAs to a much greater extent; (2) a broader concept of anti-corruption activity reflecting international guidance; and (3) increased collaboration across the Secretariat to harness the available expertise in support of this agenda.

In addition, it is suggested that a programme of development that is focused primarily on smaller states, of which the Secretariat has considerable experience, and online development could offer an appropriate way forward, while the Secretariat develops its experience and reputation in this field.

Table 1: Evaluation outcomes

Requirement	Assessment
(i) Assess the extent to which Secretariat support was relevant to the priorities of member countries and consistent with the strategic plan	The Secretariat's support through organisational development and knowledge building was relevant to members' priorities, as represented in the PDD on which the Botswana Centre was based and was consistent with the Secretariat's strategic plan.
(ii) Assess the extent to which Commonwealth member countries may have benefited from the programme and the tangible outcomes realised	Commonwealth member countries have benefited significantly from the programme through the enhancement of individual and ACA organisational capacity. The results of the course participant survey and the proceedings of the Association of Anti-Corruption Agencies in Commonwealth Africa (AACACA) are good evidence for this.
(iii) Assess the overall programme strategy and its alignment to relevant guidance provided by recognised international development organisations	Progress to date has been achieved without a formal overall anti-corruption strategy for the Secretariat. We strongly suggest that an explicit anti-corruption strategy and programme should now be developed to address the Secretariat's commitment to this field, whatever that may be, together with separate regional strategies that recognise differences in perspective, ownership and governance. Such strategies will require clearly established and validated financial assumptions.
(iv) Evaluate the efficiency and effectiveness of the Commonwealth Anti-Corruption Africa Centre as one of the core delivery components of the programme and whether or not this component can be replicated in other Commonwealth regions	Courses have been very well received and appear to have been highly effective, although the efficiency and effectiveness of the Botswana Centre have been hampered by the lack of agreed resources from the Secretariat and the challenge of establishing working relationships with the ACAs. It is considered inappropriate to attempt to replicate the Botswana Centre in other regions at present because of current financial constraints. Alternative approaches to developing anti-corruption capacity elsewhere should be explored.
(v) Assess the level of collaboration between the Secretariat, the Government of Botswana and anti-corruption agencies	There is a good working relationship between the Secretariat and the Government of Botswana, despite the shortfall in the Secretariat's financial contributions to the Botswana Centre. Networking is taking place between ACAs, although the 'vibrant network' that is sought by the Centre's strategy does not yet exist. We consider that there is a clear case for creating a greater range of professional development activities throughout the region to provide more intensive support to the control of corruption.
(vi) Assess value for money	Significant benefits on individual and organisational levels have resulted from the Centre's courses, and favourable reports have been received about the AACACA's annual conferences; however, the lack of relevant data hinders an authoritative assessment of value for money. It could be said, however, that, with course costs in the region of £2,600 per place, only 150 course participants each year and a shortage of ready financial support, a more cost-effective approach is required.
(vii) Assess the level of linkages that exist within the Secretariat on broader anti-corruption programming and how these can be strengthened or aligned	We consider that collaboration is limited and that it would be beneficial to strengthen internal linkages, particularly if the anti-corruption agenda aims to achieve higher prominence in the Secretariat's offering to the Commonwealth. The demands on limited resources must be addressed by the prioritisation of objectives and effective ground rules for engagement.
(viii) Identify issues, challenges and lessons learned and make recommendations for consideration in the next planning phase (see below for recommendations)	Depending on the Secretariat's priorities and its commitment to combating corruption, there are an enormous number of possibilities for extending the range of current activities. These could be expressed in terms of a broad strategy and assembled into some form of action plan. This could have significant resource implications that would necessitate the involvement of development partners and would inevitably require a lengthy timescale.

These and other recommendations are set out below and discussed in greater detail in Chapters 6 and 7.

Recommendation 1: The Secretariat should prepare a properly articulated, broad-based and appropriately funded anti-corruption strategy and programme of activity that will be supported by performance monitoring and evaluation processes.

Recommendation 2: The Secretariat should adopt a more collaborative approach to cross-Secretariat working. A range of approaches could be utilised in the short term to determine what works best for the anti-corruption programme.

Recommendation 3: The Secretariat should facilitate a meeting of ACA members to determine a way forward for the AAACA and the CAACC. Future developments should not be embarked upon unless there is a good measure of agreement on the issues of future funding and collaborative working arrangements between the various stakeholders.

Recommendation 4: The Secretariat should encourage the use of online platforms for knowledge sharing (e.g. anti-corruption strategies, risk assessments, research material and peer review reports), databases of current operational information (e.g. performance data, inventories of expertise and case reports) and collaboration on policy development (e.g. concerning principles, practices, protocols, model provisions and new approaches to controlling corruption) to help combat corruption.

Recommendation 5: The Secretariat should encourage the use of digital communication for syllabus development and for the delivery of training packages via the CAACC.

Recommendation 6: The Secretariat should encourage the CAACC, AAACA and Commonwealth member countries generally to forge closer links between Commonwealth member countries that are engaged in substantial reform programmes, to share their learning.

Recommendation 7: The Secretariat should encourage Commonwealth member countries to participate in anti-corruption research activities and become early adopters of research outcomes, where practicable. In the first instance, the

Secretariat should make contact with the British Academy to gain an understanding of its current anti-corruption research programme.

Recommendation 8: The Secretariat should forge links between the various anti-corruption training academies within the Commonwealth, and possibly elsewhere, to share development experiences and cooperate in their institutional development.

Recommendation 9: The next phase of anti-corruption programming beyond Commonwealth Africa should be centred, in the first instance, on a regionally based programme of small state support.

Recommendation 10: The Secretariat should consider the possibility of offering a more radical programme of reform to smaller states that are prepared to make the necessary commitment.

Recommendation 11: The Secretariat should identify the competences it requires to support Commonwealth states according to its anti-corruption strategy and programme that will be developed in response to recommendation 1 and should establish a strategy for acquiring or maintaining such competences.

Recommendation 12: The Secretariat should also determine how to advise member countries on the options that are available to deal with the long-term financial consequences of decisions made to progress a broad-based anti-corruption strategy and programme in response to recommendation 1.

Recommendation 13: The Secretariat should consider establishing a mentoring and advisory service in the longer term to assist small states in obtaining development funding for anti-corruption activities and to assist the CAACC in developing suitable stand-alone courses in support of this objective as a short-term measure.

Recommendation 14: The Secretariat should develop a new Theory of Change (TOC) for its anti-corruption programme and support the development of a new TOC for the AAACA and CAACC under their revised governance arrangements.

1. Introduction

The Commonwealth Secretariat commissioned PFMConnect Ltd to undertake an independent evaluation of its Africa Anti-Corruption Programme, including the Commonwealth Africa Anti-Corruption Centre (CAACC) in Botswana. The terms of reference (ToR) for this evaluation are not to seek the preparation of a new anti-corruption strategy or programme for the Commonwealth, which would not be appropriate given the number of issues that must be resolved by the Secretariat and other parties before that could take place. The forward-looking requirement is the preparation of recommendations for the next phase of this initiative and these are set out in the final chapter of this report.

1.1 Background

In 2011, with the support of the Anti-Corruption Adviser (the first such adviser to be appointed in the Secretariat and with no support staff), the Commonwealth Secretariat brought all Heads of Anti-Corruption Agencies (ACAs) in Commonwealth Africa together to establish an Association of Anti-Corruption Agencies in Commonwealth Africa. This Community of practice seeks to promote South-South collaboration and learning by brokering the exchange of ideas and good practices among Commonwealth Africa and to encourage the sharing of experience in areas of comparative advantage. Its key event is the annual Heads of Commonwealth Africa Anti-Corruption Agencies Meeting, at which papers are presented on practical experience and peer reviews are sometimes arranged, together with other informal exchanges. Annual AAACA meetings have now taken place in Botswana (2011), Zambia (2012), Mauritius (2013), Ghana (2014), Tanzania (2015) and Namibia (2016).

The Commonwealth Africa Anti-Corruption Centre (CAACC) was formally established in Gaborone in February 2013 by the Commonwealth Secretariat, in partnership with the Government of Botswana and the Association of Anti-Corruption Agencies in Commonwealth Africa. Over the last 3 years, it has started to develop its services, including an action-learning approach to course delivery and an increasingly extensive range of courses. Work has started on a research

programme to identify appropriate subjects for capacity development training and to promote mutual support arrangements among member countries. A monthly online journal has also been established and a helpline service is currently under development.

These activities will be examined in this report; however, because there are 18 Commonwealth member countries in Africa, getting this far is clearly a substantial achievement for a single adviser, particularly when that adviser also serves another 34 Commonwealth states throughout the world.

1.2 Scope

The evaluation is tasked to take a view from 2011 to the present day; however, given the time allowed for the study, the very wide remit of the project, the lack of financial details available to the evaluators and the changes of personnel in the field over this period, it has been difficult to do more than touch briefly on the last 5 years and then concentrate on current activities and plans and consider ways in which this agenda may be progressed.

It should be borne in mind that, although this study concerns the activities and views of those responsible for the work of ACAs and other governance institutions, this study is neither an evaluation of the performance of the ACAs themselves nor a study of corruption in Commonwealth Africa. Either of these activities would be a very significant undertaking that would require a different understanding with member countries and a different approach to conducting the evaluation.

1.3 The focus of this evaluation

The inception report specifically requires that the evaluation shall:

- i. assess the extent to which Secretariat support was relevant to the priorities of member countries and consistent with the strategic plan;
- ii. assess the extent to which Commonwealth member countries may have benefited from the programme and the tangible outcomes realised;

- iii. assess the overall programme strategy and its alignment to relevant guidance provided by recognised international development organisations;
- iv. evaluate the efficiency and effectiveness of the Commonwealth Africa Anti-Corruption Centre as one of the core delivery components of the programme and whether or not this component can be replicated in other Commonwealth regions;
- v. assess the level of collaboration between the Secretariat, the Government of Botswana and ACAs;
- vi. assess value for money;
- vii. assess the level of linkages that exist within the Secretariat on broader anti-corruption programming and how these can be strengthened or aligned;
- viii. identify issues, challenges and lessons learned and make recommendations for consideration in the next planning phase.

This report sets out the findings of the evaluation that was carried out in the second half of 2016 and draws conclusions that are intended to help the Secretariat decide how it wishes to support the fight against corruption in Commonwealth Africa. The original ToR for this evaluation are set out in Annex 5.

2. Context

2.1 The Commonwealth Anti-Corruption Africa Programme

The Commonwealth Anti-Corruption Africa Programme (CACAP) is not a formal development aid programme, as it has no standalone documentation that has been approved by the Commonwealth Secretariat. This means that there is no formally defined and agreed set of overall programme objectives, budget, performance metrics, implementation plan or statement of management arrangements apart from those in the original CAACC Project Design Document (PDD). It could be said that this evaluation and the Secretariat's impending monitoring and evaluation system are the vehicles that are intended to assist in this development.

During the period being reviewed in this evaluation, the CACAP has consisted of expenditure incurred in several activities that were initiated by the Commonwealth Secretariat including the following:

- the Commonwealth Secretariat's financial contributions to some of the operating costs of the CAACC in Botswana, which represent a key component of the CACAP, according to the ToR for this evaluation;
- the Commonwealth Secretariat's financial contribution to some costs associated with the holding of the annual conferences of heads of Commonwealth Africa ACAs;
- expenditure on anti-corruption activities in Commonwealth Africa incurred by the Commonwealth Fund for Technical Cooperation (CFTC);
- the anti-corruption work of the Commonwealth Secretariat's Anti-Corruption Adviser in Commonwealth Africa, including his contributions to the establishment of the AAACA and the CAACC, together with supporting inputs that were occasionally provided by several Commonwealth Secretariat officials during the period being reviewed.

No consolidated expenditure information for CACAP for 2013–16 was provided by the Commonwealth Secretariat for this evaluation.

Some financial information covering expenditure by the CAACC for part of the period reviewed was made available. No audited financial statements for the CAACC for any financial year since its establishment were available as of late December 2016.

2.2 Approach

The Commonwealth Secretariat's support for the CAACC is nearing the end of its initial 4-year commitment. This is, therefore, a particularly appropriate time to review the Secretariat's anti-corruption work in Africa in order to secure a successful future for this work.

This evaluation has taken the requirements set out above and the PDD for the CAACC dated February 2013 as the starting point for its work. The success of anti-corruption activity to date has been assessed by reviewing performance against the intentions set out in the PDD. Recommendations for the way forward have been framed against this assessment together with the international norms for anti-corruption activity, as referred to in requirement (iii); thoughts on the replicability of the current model, as referred to in requirement (iv); and the potential benefits of improving collaboration within the Secretariat, as referred to in requirement (v).

The basic evidence for this evaluation, other than for the international norms referred to above, has been obtained by means of interviews and surveys. Interviews were held with Commonwealth Secretariat advisers and support staff to gain a view of internal Secretariat collaboration and the assistance it affords member countries in their efforts to combat corruption. Interviews were also held with CAACC staff to review their service development and delivery activities and their stakeholder relationships.

Attention was also paid to Commonwealth Africa states and their experience of support for anti-corruption activities from the Secretariat advisers, the CAACC and each one another via networking. Evidence was obtained from a wide range of field interviews in Botswana, Ghana, Rwanda and Tanzania. These involved staff of the ACAs and other governance institutions, multilateral agencies

and non-governmental organisations (NGOs). Interviews were also conducted online and via email with other ACAs that were not visited to validate feedback gained from fieldwork; these included ACAs in Lesotho, Mauritius, Seychelles and South Africa.

A major online survey of course participants was undertaken to understand their training experience, its benefits and their ideas for course development. Space in this report allows only a very condensed reflection of the results from that survey. A full report on the survey has been prepared for the benefit of the CAACC, the Secretariat and other interested parties. A smaller survey was also undertaken to probe the extent of networking currently undertaken by ACAs.

Although the main focus of the evaluation is on the contribution of the Secretariat's anti-corruption support to Commonwealth Africa, when framing many of the recommendations for future development it did not seem appropriate to do this except on a general basis for the Commonwealth as a whole. Additionally, requirements (iv) and (viii) seem to invite a wider view.

It should be noted that the ACAs have a variety of titles, but, to simplify matters, they are all referred to generically as ACAs, with a country reference where appropriate. However, it should be noted that they do not all have precisely the same TOR and, in particular, the ACAs of Nigeria, Rwanda and Uganda have powers of prosecution for corruption offences, whereas the others do not.

2.3 The challenge of corruption

Corruption concerns the use of public position to gain private advantage, such as wealth, power or status. Corruption can take many forms, ranging from the misappropriation of funds to extortion and the abuse of patronage. It can reduce state revenues, increase state expenditures, diminish economic development and impair the capacity of public services. It can also hamper the transition from aid as project funding to aid as direct budget support. Corruption can undermine nationhood by destroying confidence in public administration and the political process, impoverishing communities and denying opportunity.

The research organisation Global Financial Integrity suggests that illicit financial flows from developing countries have reached the staggering sum of

US\$1 trillion per year. In 2015, Daniel Kaufmann estimated that the annual global cost of bribery alone was about US\$1.5 trillion to US\$2 trillion (roughly 2 per cent of global gross domestic product – GDP). The overall economic and social costs of corruption are, however, likely to be even larger, since bribes constitute only one aspect of corruption.

The United Nations (UN) Economic Commission for Africa in its recent African Governance Report IV (2016) implicated the West in aiding and abetting corruption abroad when it suggested that 'the role of private sector actors in fuelling corruption ... should not be ignored'. Measures to curb corruption are reflected in the UN Convention against Corruption (UNCAC).

Corruption is an ever-present feature of public life but the very high level reached in many developing countries is seriously detrimental to the citizens of those countries, for a variety of reasons:

Direct public detriment

- Frequent significant reductions in national prosperity.
- Skewing of resources towards the corrupt and their adherents.
- Denial of economic opportunity to those without the means to offer inducements or who are not prepared to do so (e.g. public procurement, trading licences, planning permission, public service employment).
- Denial or reduction in public services for those without the means to offer inducements or who are not prepared to do so (e.g. health and education).
- Reduction in public service efficiency (e.g. through the employment of candidates for public positions who are not the most suitable for the work involved; through staff deliberately reducing performance to elicit bribes to increase the pace of delivery; through the maintenance of unnecessarily complex regulation to provide opportunities for staff to facilitate performance).
- Denial of justice by corrupt court officials.
- Denial of fair access to employment (e.g. through nepotism);

- Lack of accepted authority and public unrest arising from the breakdown of public respect for authority, and the general acceptance that detrimental events are the responsibility of those in authority as a result of their deliberate neglect and dishonesty; this may ultimately give credence to seriously dangerous alternative sources of authority.

Indirect public detriment

- The discouragement of development aid as a result of a perception that substantial sums are misappropriated by recipient administrations, thereby calling into question the taxation policies of donor countries and implicating donor administrations in corruption.
- The discouragement of inward investment into developing countries as a result of the risks associated with doing business in a corrupt environment by virtue of the increased difficulty of business processes; the additional costs of doing business; the increasing possibility of corporate officeholders being prosecuted in their home countries for facilitating business through corruption abroad; and the prospect of major sanctions being imposed on foreign companies for winning work by corrupt means.

3. Findings

Field visits and online interviews took place with CAACC staff about their services and their aspirations for service development. Discussions were also held with public servants in Commonwealth African states and development agencies to gain an understanding of the value attributed to the Secretariat's anti-corruption activities, the value offered by the CAACC, anti-corruption practice, development priorities and networking activities within and between states. These discussions were designed to establish performance in comparison with the PDD assumptions referred to in Chapter 2 and gain insight into current practice, the need for support and opportunities for anti-corruption development initiatives.

3.1 Commonwealth Africa Anti-Corruption Centre

3.1.1 Governance and purpose

In 2011, the Anti-Corruption Adviser organised the first annual meeting of the heads of Commonwealth ACAs (to facilitate the establishment of the AAACA) to discuss the development of their work and make arrangements for mutual support, as discussed later in this chapter. Two years later, the Adviser and the head of the Botswana ACA (Directorate of Corruption and Economic Crime (DCEC)) formed the CAACC (in late February 2013) to provide training for ACA staff. The idea of the CAACC was canvassed among members of the AAACA, and Botswana offered to host the initiative and provide substantial financial support. The AAACA was formally established in May 2013.

The CAACC has an Advisory Board made up as follows: one representative from the Commonwealth Secretariat (the Anti-Corruption Adviser); two representatives from the Government of Botswana (the head of the DCEC and the Director of the Public Services College of Botswana); the Chairperson of the AAACA; three members of the AAACA (one each from the West, Southern and East Africa Regions); and a UNODC

representative. In practice, the Board exercises limited control over the Centre. Some ACAs noted that they had no contact with the Advisory Board.

The head of the DCEC and the Commonwealth Secretariat Anti-Corruption Adviser play a very active role in guiding the development of the CAACC. On a day-to-day basis, the CAACC is answerable to the Centre Manager. The Manager has four assistants: the coordinators of communications and public affairs, training and research and the Head of Finance. CAACC personnel are seconded from the DCEC, and the Government of Botswana pays their salaries and funds the office accommodation. The Commonwealth Secretariat pays for accommodation and meals for course attendees, conference venues and office expenses. The travel costs and salaries of attendees are paid by their employing governments.

The purpose of the CAACC is to train staff of ACAs, promote mutual support and self-help among ACAs and undertake research to further these objectives. The CAACC has recently established a web-based helpline (although this is not yet in significant use) and newsletter. There is a clear interest in the CAACC's using digital communication in the various aspects of its work. There is a feeling of remoteness from the development of the CAACC among some members and it is possible that online communication could be used to engage a broader range of members in CAACC governance arrangements and development activities (discussed below).

The CAACC is currently in the process of developing a revised strategy document covering the various aspects of its work.

3.1.2 Course structure and subject matter

The CAACC provides courses that usually contain three modules, with practical assignments being set for the periods between modules. The assignments must be returned before the courses are resumed and failure to complete an assignment results in students being refused permission to return by the CAACC. The projects returned to the CAACC are evaluated by the course facilitators and, on their return, participants present their work to the class.

The training coordinator requires training plans and presentations to be submitted prior to the commencement of each course and maintains a library of presentation material. Course participants are required to evaluate their courses upon completion. New subject matter is under regular consideration by the training and research coordinators.

There is now a programme of nine courses, as follows:

- anti-money laundering measures
- case management
- communication and public relations (one module)
- effective monitoring and evaluation of corruption prevention strategies
- global programme on anti-corruption financial crimes and asset recovery
- heads of investigation and prosecution training
- leadership and management
- managing exhibits and proceeds of crime
- professional ethics and integrity.

Recent interviews with ACAs have revealed a growing interest in public education among ACAs, and ways of building this into courses are currently being explored, including engaging course participants in public awareness-raising meetings. There was a feeling that greater emphasis should be placed on the development of staff committees to lead the sensitisation of public service staff to the problems of corruption. Calls were made for greater emphasis on the management of evidence, investigation techniques, intelligence-led investigation and asset recovery, on training for international collaboration and on interview techniques. Training for expert witnesses on how to behave in court was also mentioned. Most interviewees expressing an interest in CAACC development stressed the need for greater support to help combat the use of digital technology by criminals. There were calls for advanced training and continuous professional development training, as well as basic training for smaller states that do not have induction training facilities.

Several interviewees wondered whether or not the judiciary fully understood the nature of corruption in some of its more technical forms and suggested that the judiciary should be offered expert training in appropriate fields.

In addition to many of the above requirements, Rwanda planned to give high priority in the next year to improving the general effectiveness of all staff and specialised training relevant to complex investigations. In relation to the latter, it appears that project management skills were becoming highly relevant, although that term was not in general use. The importance of developing high-grade management capacity as an issue in its own right is discussed in Chapter 4.

At least one course participant now delivers presentations and this suggests that the demand for the provision of training courses for trainers should be explored.

Although there was criticism that some courses started at a rather basic level, it was generally agreed that courses were well presented, interesting and relevant. Participants made special mention of the leadership and management course, the ethics and integrity course and the sessions dealing with public education. It was very clear that participants valued meeting others from across Africa, which meant that they could share experiences and learn together. This was stressed many times. There was a sense among interviewees that they were aware that new corrupt practices that occurred in one place would soon migrate elsewhere and that the need to stay abreast of events was a high priority.

In terms of CAACC developments, Mauritius would welcome a greater emphasis on ACA performance improvement, such as the development by the CAACC of performance assessment indicators to help ACAs evaluate their rate of improvement; presentations from very senior ACA officials to facilitate sharing of practical experiences; and the participation of non-African countries with very low levels of corruption to facilitate the sharing of approaches to the reform and maintenance of high standards. Mauritius also suggested that courses might be held in other African countries occasionally and that South Africa might be considered; its accessibility means that travel costs are cheaper.

When networking took place, it was organised without the involvement of the CAACC.

In terms of subject matter, procurement was regarded as the most troublesome process and the construction industry as the business activity of gravest concern.

3.1.3 Course participants and delivery mechanisms

There was widespread interest in course participation by staff from other public sector organisations, for example those responsible for internal audit and procurement. This reflected the development of joint working arrangements with such organisations.

Some of the partner organisations were obvious sources of expertise; for example, the Botswana Internal Audit service gave lectures on its approach to risk management.

There was a general feeling that an opportunity might be taken to hold some courses around Africa. The CAACC had recently held a civil society conference in Botswana that was attended by local NGOs, the media and course participants, and intended to move this course to other countries if it proved successful. A member of the evaluation team was present at a follow-up meeting with a newly established NGO that had an interest in public accountability. It appeared from this meeting that the conference had proved a considerable success.

Discussions with the CAACC technical expert raised the possibility of advisory groups being established for the development of courses on specific topics. Such arrangements could also identify relevant fieldwork that could be used in presentations for illustrative purposes. This could help with responding to the strongly held view that more African examples should be used in presentations and that some sessions should be more practical in their approach. This latter point was interpreted, in part, as a search for ways of making courses more accessible to those without a great deal of experience.

Most interviewees suggested that digital communication could be employed in the dissemination of course material and the delivery of seminars. Some thought it could be useful to offer basic material in digital packages to give participants a reasonable level of familiarity with a subject, particularly when advanced courses were designed

for senior staff members. Online provision was seen to be cost- and time-saving and, therefore, of general benefit, although it would clearly require new skills and there would be additional development overheads. One interviewee was undertaking a course with the World Bank, with a moderator in Washington, that used digital packages and online seminars.

Some interviewees were aware of similar centres elsewhere, particularly in Malaysia, Singapore and Austria, and it was suggested that links could be made with some or all of these centres to share ideas on the development of courses, information on international trends in corruption and the effectiveness of various measures for combating corruption. It was also considered that twinning arrangements between centres could help forge inter-regional links and help improve the general capacity and status of the CAACC.

It was suggested that course attendance and attainment could be enhanced by the provision of certificated courses, particularly if they were used as eligibility criteria for staff promotion.

3.1.4 Research issues

The Research Coordinator occasionally searches the web for anti-corruption strategies. She felt that the CAACC could try to assemble an archive of ACA annual reports, anti-corruption strategies, risk assessment strategies, guidance manuals, performance plans and performance-monitoring data (particularly if this could be developed across the region in a reasonably standard format) and these could all be made available on the CAACC's website. Information sharing about corruption cases was also regarded as important, particularly given the similar legal backgrounds of Commonwealth African countries. Such an archive would also assist when updating relevant legislation.

The Research Coordinator intended to inform training programme development by analysing the ACAs' skill gaps. This task has been given a useful start by a study commissioned by the UNODC representative on the Advisory Board.

The Research Coordinator explained that a system is being established to evaluate the performance of the CAACC on the three dimensions of training, research and networking. A business plan is currently under development.

Interviewees in Rwanda were interested in research that would help them to establish the likelihood of corruption taking place in particular circumstances and provide feedback on the acceptability of their own performance, including their use of systems and tools and their ability to deliver anti-corruption messages with the necessary conviction. They were interested in data about the corruption levels that are prevalent in the private sector and civil society and they wanted to know the cost of introducing improvements and how quickly improvements could be made.

The Communications and Political Affairs Coordinator had arranged to meet ACA liaison officers following their visit, with the intention of improving the level of response to CAACC requests for feedback in support of research and training development.

3.1.5 The role of the Secretariat

The Anti-Corruption Adviser supported the CAACC by providing guidance, both as a member of the Advisory Board and during field visits between meetings. His contribution had been valued by the head of the DCEC and she wanted more regular and lengthy visits from him (three or four times every year for 3 weeks at a time). His presentations to CAACC events were highly regarded.

The funding of the Secretariat was valued, although payments were perceived to be erratic and this was unhelpful. The shortfall in agreed funding was concerning and the lack of future commitment to funding was of particular concern. The evaluation has concluded, however, that greater clarity on funding issues could have been achieved if the CAACC had been clearer and more frequent in its communication with the Secretariat concerning future spending intentions, expenditure monitoring and invoicing. The poor quality of the reimbursement documentation is evident. Nevertheless, the PDD gave the impression that the CAACC would receive £250,000 per year for 4 years and that has not happened. It seems unlikely that more than half that sum will have been made available when the 4-year period is completed at the end of 2016.

A technical expert with a corruption investigation background was supplied through the Commonwealth Technical Cooperation Fund to assist the CAACC in 2016. His remit is to prepare a manual to support investigation work and to

provide advice on the development of the CAACC. This placement has fallen short of expectations, in that relationships have not developed in a satisfactory way and the contribution made has not been valued to a satisfactory extent. There would seem to be an acceptance by all senior parties, including the expert himself, that this placement should not be extended and the head of the DCEC considered that her proposal for more regular visits from the Anti-Corruption Adviser would provide a suitable alternative. The expert had worked for the Secretariat on a previous occasion and others have spoken to the evaluators in favourable terms about the expert's contribution elsewhere.

3.1.6 Finances and value for money

The understanding on the funding of travel expenses for CAACC courses is that the ACAs pay travel costs and an annual fee of US\$3,000, a contribution that reflects member countries commitment to the Anti-Corruption Centre and the programme. This fund will also contribute to the cost of accommodation and meals in the long-run ensuring a level of sustainability of the Centre. The AAACA has power of disposal over the funds accumulated to date, although, since some member countries are in arrears, the balance is less than £40,000.

CAACC staff believe that they have sufficient funds to finance two courses in November 2016 and then would have almost nothing left for further courses. The relationship between the Secretariat and CAACC on financial matters has been described above. The financial position will remain unclear until the Secretariat can validate the expenses claim from the CAACC that was submitted during the project.

The evaluation team has been informed by CAACC staff that they have prepared several project bids for support from various donors to fund further courses. Progress on all these current financial issues now lies outside the timescale of this evaluation.

All the ACAs that were interviewed suggested that the CAACC was important for their future plans and a number indicated strongly that the CAACC provided good value for money. None of the member countries voiced a view that the CAACC does not provide value for money, although some suggested that even better value for money

could be achieved if the CAACC could find a means of harnessing new technology for capacity development purposes.

Several interviewees suggested that there should be a bursary scheme to finance the costs of attendees with employing authorities that could not afford to send them on courses. Some suggested that such a scheme could potentially fund attendance at anti-corruption centres elsewhere.

There was a view from the Secretariat that financial management standards at the CAACC were not yet satisfactory, despite staff having been given training at the Secretariat offices in London, and that the situation must be rectified. The evaluation team agrees with this.

There was a concern in the Secretariat that a substantial amount of Secretariat funding was spent on food and accommodation for anti-corruption course and AAACA conference attendees. Apart from this concern and the feeling that there may have been teething problems with arrangements, there was a remarkable lack of knowledge about the CAACC or the AAACA.

3.1.7 Travel access

Some course participants seem to have experienced entry problems in Botswana. Visas are required for Nigeria, Cameroon, Rwanda and Ghana. Neither Cameroon nor Rwanda has a Botswanan embassy and Rwanda tends to use Kenyan facilities. Staff from Rwanda reported that they had particular difficulties in obtaining visas.

CAACC staff have worked hard to minimise these problems and staff are exempted from the need for visas to enter Botswana when they have service passports; however, not all states use this system. In addition, Rwanda is one of two countries requiring staff to make internal applications to leave the country and this adds time and uncertainty to course attendance arrangements.

Botswana does not consider this to be a general problem, although some further review could help to identify the scale of the problem and possibly resolve any lasting difficulties experienced by member countries.

3.2 Anti-corruption agencies

3.2.1 The role of the anti-corruption agencies and the impact of corruption

The ACAs are responsible for staff, raising public awareness, prevention and investigation. Several undertake prosecutions. It is relevant, however, that the main burden of their work lies in investigation and, more recently, with public education. Prevention in its many forms is regarded as important; nevertheless, this is substantially outside their day-to-day experience. ACAs often have memoranda of understanding with some of the other departments and agencies that are engaged in preventative work, such as ethics commissions, procurement authorities, competition authorities and ombudsmen (although the ACA function in Rwanda falls under the aegis of the ombudsman).

The International Monetary Fund (IMF) representative in Tanzania helpfully summed up the problems of corruption from a donor's perspective. He suggested that the effects of corruption are costly and bad for growth. It represents a major misuse of resources. It discourages donors and could result in the discontinuation of direct budget support. The withdrawal of direct budget support could, in turn, result in reduced donor interactions with government and this could lead to a lack of focus by donors on current public financial management (PFM) development needs and programmes of activity. Anti-corruption activity is extremely important to ensure that donor resources were not misused. It is, therefore, important that minimum standards are in place for PFM and the judicial process.

The Chief Investigations Officer in Tanzania remarked that 'in terms of economic priorities, grand corruption relates to very substantial sums of money but petty corruption blighted the lives of the poorest people, and was also important because people resented it'. Petty crime is, therefore, of considerable social importance and it still represents considerable 'budget leakage'.

3.2.2 Priorities for improvement and major concerns

The Auditor General of Rwanda opened his interview with the comment that 'Unless there is good governance in government institutions, corruption will find its own way into life'. Others

offered the view that 'Proper governance requires proper observance at a deep level. In this the top leadership must adhere to the same principles as everyone else' and that 'Poor administration can degenerate into corruption'. We consider that these comments underline the international consensus that we shall deal with in Chapter 4.

The inference that can be drawn from these remarks is that there must be good systems of governance in place and they must be observed or a descent into corruption is inevitable. In terms of prioritisation, the remarks of the Chief Investigations Officer in Tanzania (see above) clearly had the aim of making an emphatic claim regarding the importance of petty crime and, therefore, of practice at the very lowest level, as well as at the top. We understand that a similar view is held elsewhere, for example in Uganda.

There was a very clear view that the engagement of civil society was essential through school discussion groups, radio and television broadcasts and public meetings. ACAs were becoming more heavily involved in public campaigns and posts were being established for this purpose. Ghana is to prioritise public campaigns against corruption, including awareness of its National Anti-Corruption Plan, although there is concern about the financial burden of such publicity. Uganda is also taking a vigorous approach to public education.

Rwanda favours the use of more sophisticated technology to eliminate opportunities for corruption by reducing interactions between public officials and citizens. This was also regarded as a high priority by others, including those in the health and education sectors.

Effective leadership was regarded by some as an essential ingredient in eliminating poor performance. This included the identification of critical changes, the encouragement of initiative, recognition for new ideas and rewards for improvement. An emphasis on continuous improvement was shown by top public servants in Rwanda and we felt that this was a powerful factor in their considerable success.

Collusion and bid rigging in the procurement process was a widespread concern, as were various practices in the construction and extractive industries. Wildlife and taxation were also mentioned regularly as problem areas.

Local government was identified as a problem area in Rwanda and it is our experience that this is mostly the case throughout the region and that state-owned enterprises are often also very seriously affected, although there was not sufficient time to include them in this study.

Evidence management was seen as a general weakness; there was concern over carrying out asset recovery (including access to banking information in foreign domains) and the Department for International Development (DFID) Financial Liaison Officer in Tanzania suggested that greater emphasis on interrogation techniques could improve the effectiveness of investigations. The abilities to access digital information and follow digital trails were seen as key deficiencies at present. There were references to the possibilities of using computer skills as an organising enabler and this could be a useful subject for exploration, although the evaluation did not have sufficient time to examine current levels of competence. Complex case management was a shared concern.

Poor legal drafting was regarded as hampering prosecutions and some wanted the introduction of legal provisions that would require public servants to explain the origins of their wealth or have unexplained assets confiscated. In Ghana, there will be training next year to support the Code of Conduct for Public Officials.

3.2.3 Good practice and innovation

The Public Prosecutor in Rwanda prioritised the need to identify the right approach to fighting crime with regard to obtaining finance to combat corruption.

Public officials in Rwanda were required to disclose their assets, and their PFM systems were of a relatively high standard in the opinion of the country's DFID representative. It was notable that wide-reaching reform was now being undertaken in Ghana through its anti-corruption plan and in Tanzania through an extensive programme of PFM systems development. The success and sustainability of these reforms and other such reforms within the Commonwealth seems worth monitoring if they have the necessary confidence levels and there is a genuine willingness to share experiences.

Rwanda has introduced an e-procurement system and a gateway for digital access to public services. These two initiatives, in themselves, deserve serious study for the possible benefit of other member countries. Botswana has driven the system of staff corruption committees, which is thought to have originated in Kenya, and has sought to minimise compliance checks for tenders to reduce opportunities for corruption. These are good practices that should be disseminated. The cause of staff committees has now been adopted by the CAACC. Compliance check minimisation seems worth tracking. There are clearly many opportunities for the identification and dissemination of good practice.

Internal audit is under development at present.

In our view, supreme audit institutions are not necessarily using or supporting the reports they produce to the maximum possible extent. The role of supreme audit institutions is increasing. Skill sets rightly embrace risk assessment and their subject matter now includes the UN Sustainable Development Goals and their performance indicators. The management of this changing situation is clearly critical to ensure that audit makes an increasingly effective contribution to reform. There would seem to be a strong case for tracking the impact of these changes to establish the most appropriate development path for these valuable and expensive resources. The evaluation team has not been able to have the time it would have wished with the PFM Adviser, but we assume that these considerations are in hand.

Risk assessment techniques are being developed in various branches of PFM. The procurement staff in Tanzania described their development work. They are developing a system whereby assessments are made of the likelihood of corruption being present in a situation. This seems to fit with the interests expressed by other states concerning the need to be better equipped to identify corruption. Risk assessment in its various forms is a developing subject that seems to be of particular relevance to the anti-corruption agenda.

Complaints mechanisms are becoming more prevalent. This encourages feedback on performance and offers opportunities for citizens to raise concerns about corruption. As mentioned above, officials are finding that an enormous number of erroneous views on the prevalence of corruption are expressed when new complaints

processes are introduced. This indicates the extent of public concern regarding the probity of public administration and indicates that there is a need to find ways of handling public engagement in a constructive manner. Failure to deal with erroneous views could lead to heightened discontent. As often happens, openness, although eventually beneficial, is not always an easy culture to introduce and should be carefully organised and trained for.

Given that public sensitisation to corruption is becoming increasingly wide-ranging, it seems that, in some countries, anti-corruption campaigning is beginning to take the form of a national movement that is sponsored by the state. The International Anti-Corruption day was held on 9 December 2016 and many countries marked this day with special events. Seychelles extended it to a week of events. Is this trend something the Commonwealth would wish to encourage as a Commonwealth-branded development? Should there be a regional public platform for Commonwealth Africa?

3.2.4 National conditions

Rwanda has reasonably well funded governance arrangements and good internet services (at least in the capital). Tanzania is gripped by budget cuts but has a pool of donors to fund information and communication technology (ICT) systems development. Ghana has a new National Anti-Corruption Action Plan, although it has capacity and funding challenges. Ghana also has donor funding for governance reform. Botswana has an established set of governance institutions that appear to be resourced reasonably well. Seychelles is establishing an ACA and is eager to make progress.

The Ghana Integrity Initiative sounds a cautionary note that is perhaps common to many African states. It raises a concern that too many top governance posts are at the disposal of the President. If the Commonwealth is to make anti-corruption a key platform, is this the moment for very clear encouragement of parliamentary appointments or effective parliamentary vetting of appointments to such posts?

3.2.5 Internal collaboration

One Rwandan official considered that results-based performance systems require considerable collaboration between government agencies to be successful. An attractive feature of such

systems is that they will tend to cement healthy relationships in which there are shared objectives and true collaboration. Most of the states contacted talked readily of the memoranda of understanding that had been agreed between their various governance units. We consider, however, that where perfunctory collaboration exists within an isolationist and distrustful environment then results-based performance systems could result in costly obfuscation.

It is early days for such systems to be applied in the anti-corruption arena. Our research demonstrates that, in some states, even the sharing of data between governance units is resisted vigorously and some states are simply not ready for this approach. Mandatory linkages between databases and ready access for authorised users on official business could be a useful prerequisite for such arrangements. Progress must be well targeted and could be the subject of CAACC monitoring and support.

Ghana has an excellent system of collaboration on the development and implementation of its national Anti-Corruption Action Plan that includes the NGO sector. It is not the case in every member country that we have interviewed that all anti-corruption plans or risk assessments or other such governance strategies are jointly developed, monitored or made readily available. This is an issue where practice could be researched by the CAACC, shared between states and kept under review.

3.2.6 Links and transfer of ideas across Africa and the role of the Association of Anti-Corruption Agencies in Commonwealth Africa

Ghana has set up benchmarking and exchanges good practices with other countries; for example, Ghana looks to Rwanda in the area of asset declaration by public officials and government appointees (a visit is planned in January 2017) and to Kenya for integrity declarations. The ombudsman in Rwanda had hosted study tours from Lesotho, Malawi and Zambia and participated in information exchanges with other anti-corruption organisations in the East Africa region but has suggested that there was scope for making increased use of exchanges between AAACA members. We also understand that Uganda has received numerous delegations.

Mauritius considers the AAACA helpful in that it encourages the sharing of materials, resources, ideas and networking and it benefits from country visits. Seychelles had a similar attitude and asked the evaluators to introduce them to the Rwandan ombudsman, which they did. The Auditor General of Tanzania considered that the sharing of experiences throughout Africa was a useful practice. The Competition Authority in Botswana described joint working arrangements with South Africa that had resulted in simultaneous raids in both countries to obtain evidence of malpractice. Mauritius wondered whether it might be feasible to produce a Commonwealth interstate mutual support agreement of some kind.

The Lesotho ACA had established a specialised information technology (IT) section within its office but funding had been withdrawn in recent budget cuts. It wondered if it was possible to fund shared facilities jointly that could not be afforded by individual states.

The Chief Internal Auditor in Botswana explained that her staff were members of the Africa Institute of Internal Auditors and the national Institute of Internal Auditors but on a personal basis. There was no regional or pan-African or Commonwealth Africa association of internal audit agencies as far as she knew.

It was reported that the African Association of Anti-Corruption Authorities, which represents all Anglophone, Francophone and Lusophone countries in Africa, currently has 34 member countries but has not met since the Accra conference in 2013 because of the Ebola outbreak. It is hoped that a meeting will be held in the Republic of the Congo in 2017.

3.2.7 Secretariat relationships

Relationships with and views on the Secretariat were mixed. Mauritius reported good support for legal drafting, such as input to codes of conduct. Botswana reported support from the Commonwealth Secretariat in drafting procurement law. The Botswana Internal Audit service had received several visits from the PFM Adviser. Other countries had little contact with the Secretariat apart from ACA heads, who had met the Anti-Corruption Adviser at annual AAACA meetings.

Several interviewees mentioned that support in drafting procurement law would be helpful. It was made clear by some interviewees that, when the Commonwealth gave advice to states, the advice should not compromise on basic principles, such as limiting the patronage of presidents over key appointments, and the duty of parliamentarians to hold the most senior office-holders to account should be made very clear. In effect, it was counterproductive for the Secretariat to compromise on fundamental principles for the sake of being involved. Compromised drafting was very difficult to overturn.

3.2.8 Development funding and support

There was a keen interest in the possibility of the Commonwealth Secretariat helping to facilitate donor funding for all manner of developments.

Funding was seen as desirable to improve the quality of anti-corruption strategies through work on risk assessment and more detailed corruption surveys. In Tanzania, the construction of databases to improve the effectiveness of fieldwork was regarded as important and the Auditor General of Tanzania referred favourably to the support received from the DFID to strengthen their anti-corruption action programme and improve collaboration between his office, the ACA, the Director of Public Prosecutions, the judiciary and the police force.

The Head of Procurement in Botswana commented that technical partners were highly valued. The Tanzanian procurement authority referred to support that it had received from USAID and the African Development Bank

The Government of Rwanda took the view that it must first set out its priorities and then seek assistance, rather than follow a more donor-led approach. Its current development partner funding comes from the PFM basket mechanism. It also has an e-procurement project that is included in the World Bank results-based funding programme, although it is included on a monitoring basis because it is an early-adopter governance project.

The DFID referred to an anti-corruption research project that it was funding via the British Academy. This has obvious learning potential for the Commonwealth's anti-corruption activities.

It is noteworthy that the DFID's Multilateral Aid Review 2016 suggests that the Commonwealth is not regarded as a high-performing agency, with particular reservations concerning its internal management capacity. It is clear from this that, if the Commonwealth Secretariat's reputation is in question to some degree and if it wishes to undertake activities requiring the support of development partners, then it must do so by capitalising on recognised strengths and making outstanding contributions in its chosen fields. It has been suggested that a particular strength of the Commonwealth is its familiarity with the many small states that are included in its membership and that such members may offer at least one area of activity in which a well-designed offering could form the basis of a cost-effective anti-corruption development activity for sponsors.

3.2.9 Gender

Women are the highest-ranking officials in several ACAs and are also deputies in several other ACAs. In some ACAs, women are well represented at all levels. It was agreed, however, that ACAs often recruited from those with military or police backgrounds and that this resulted in a tendency for recruitment for most ACAs to be biased towards the appointment of men.

3.2.10 Networking

A networking survey was undertaken by email to understand the level of ACA cooperation on anti-corruption issues with development partners, other public sector bodies and NGOs within their own countries, as well as with other ACAs and public sector organisations in other countries. Although the questionnaire was relatively simple to complete, only three responses were received. These were submitted by Lesotho, Mauritius and Rwanda. Mauritius and Rwanda reported relatively significant levels of cooperation with domestic and international organisations. There was not enough material to draw conclusions from this exercise.

Clearly, there is a reticence about sharing this information and this seems to correspond to the difficulty experienced by the CAACC in obtaining responses to its surveys from ACAs. Further consideration should be given to whether or not this raises issues that could be usefully explored by discussion at the forthcoming AAACA annual meeting or the CAACC Advisory Board.

3.2.11 The technical expert placements

'Technical experts' are recruited for periods of 1 or 2 years and paid for by the CFTC. Their appointments are arranged by the technical unit to which they report, although their recruitment and performance is undertaken and assessed in consultation with the relevant advisers. The evaluators had difficulty finding evidence of technical expert appointments that were made in support of anti-corruption purposes. One such appointment was a placement made in Nigeria in 2011–13. The expert had been recruited to prepare course material about intelligence-driven investigations; the enhancement of links between prevention and the law; the creation and management of investigation taskforces; and the investigation and location of assets for recovery. Details of the work undertaken were obtained from the expert himself, but his value was attested to by an adviser who was familiar with his work.

3.2.12 Financial information

The evaluators did not find it easy to identify and access relevant financial information. This was partly because there is no formal CACAP budget or accounts and partly because the system of reimbursement to the CAACC has not been rigidly adhered to by the CAACC. This has caused both arrears of accounting information and vagueness about the relevant years of account. Historical data has proved elusive despite assistance from several finance staff in the Secretariat.

In Chapter 5 we make some rough estimates. We consider that detailed historical costings are not crucial to this exercise. Nevertheless, if future evaluations are required to judge value for money, then we suggest that the Secretariat's finance and evaluation personnel should meet to discuss what is feasible and how the required data is to be made available, particularly for evaluations that have very limited durations, as in this case.

3.3 Capacity development

An online survey of employees of ACAs who had attended courses provided by the CAACC between June 2014 and September 2016 was undertaken to assess the benefits arising from their participation in the courses and to seek participants' views on the subject matter of future courses. The survey results are set out in Annex 5 and summarised below.

3.3.1 Survey methodology and respondents

The survey methodology drew on that used in a study undertaken in 2010–14 by two African public sector groups, the Southern African Development Committee organisation of Public Accounts Committees (SADCOPAC) and the Eastern Africa Association of Public Accounts Committees (EAAPAC).

The survey included 10 questions that sought to determine which individual and organisational benefits had been gained from the courses:

- the immediate value gained by participants;
- the potential value identified by participants;
- how participants changed their work approach as a result of their learning;
- the significant changes, if any, that had arisen in their work place following course attendance.

There were 65 survey respondents, of whom 59 completed the survey in full. Details from the six incomplete responses have also been included in the results. An initial cohort of 107 course participants was identified from course evaluation reports where email addresses were supplied. This yielded 40 responses. A further 25 responses resulted from an appeal to ACA chief executives to encourage responses from other course participants who were less directly accessible. Of the respondents, 36 per cent were female and 64 per cent male. This reflects the gender split of the initial cohort.

3.3.2 Personal benefits reported by course participants

Six questions addressed the personal benefits reported by course respondents, as follows:

- Immediate personal value:
 - the personal value of the training courses they attended;
 - the extent to which the training courses they attended expanded their current knowledge of the relevant topics;
 - the extent to which the training courses they attended increased their ability to perform their current anti-corruption roles.

Table 3.1 Personal benefits from courses

Survey topics	Responses in highest band (%)	Responses in second highest band (%)
General value	59	41
Expansion of knowledge	37	54
Improvement in capability	26	52
Future personal benefit	30	63
Personal work impact	22	48
Sharing ideas on return to work	15	53

- Potential personal value:
 - the extent to which the training courses they attended would be helpful to them in the future.
- Work impact:
 - the significance of any changes made in their own work by utilising knowledge that was gained from the training courses they attended;
 - the extent to which they shared ideas from training courses with their colleagues upon their return to work.

The highest and second highest scores recorded for the six points listed above are presented in Table 3.1 (i.e., of the five response bands offered in the survey, the table shows the proportion of responses

in the highest two bands of significance/value). The results suggest that a high level of personal benefit was gained from course attendance.

Figure 3.1 shows an analysis of survey responses for the four principal courses that operated during the survey period.

The most significant improvements were reported by respondents who attended the senior leadership course and the public education and corruption prevention course.

The survey indicates that CAACC courses were viewed as relevant to the needs of most respondents and were effective in improving their performance

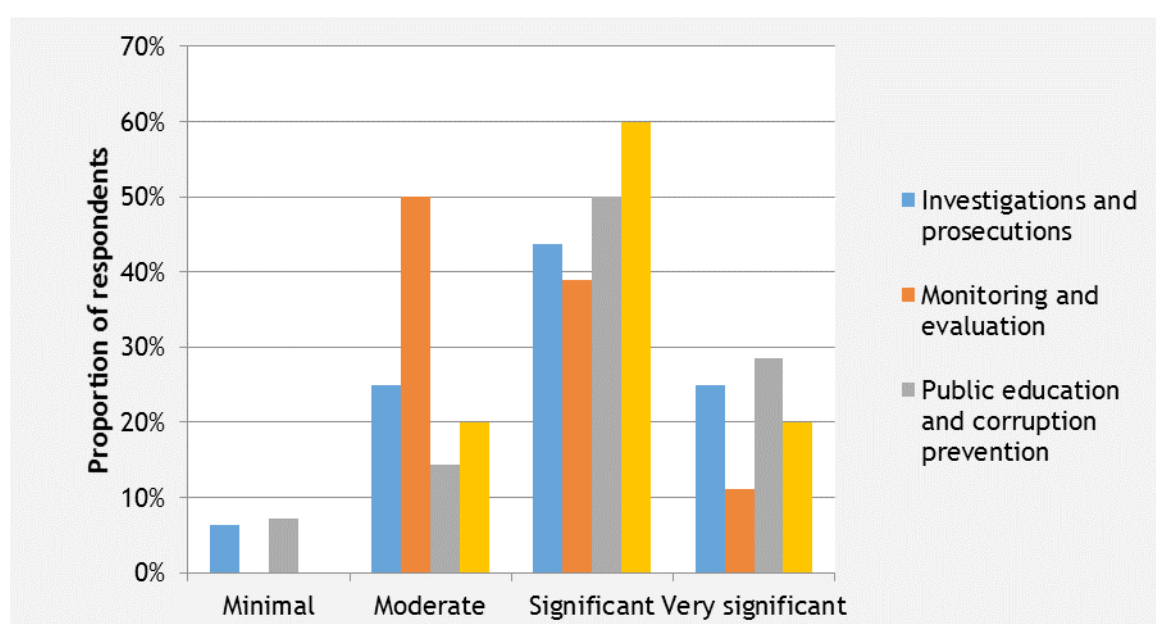
Figure 3.1 Respondents' views on the impact of CAACC courses on their work

Table 3.2 Organisational benefits from courses

Survey topics	Responses in highest band (%)	Responses in second highest band (%)
Changes in procedures/processes	6	31
Sustainability of changes	23	52
Transparency of changes	10	25
Applicability of changes elsewhere	33	40

3.3.3 Organisational benefits reported by course participants

Four questions addressed organisational benefits reported by course respondents, as follows: the significance of any changes made to their organisations' procedures and/or processes as a result of suggestions they made that arose from knowledge gained at the training courses; the sustainability of the changes; the transparency of such changes; and the applicability of such changes to other public sector organisations in the country.

The highest and second highest scores recorded for the four points listed above are presented in Table 3.2 (i.e., of the five response bands offered in the survey, the table shows the proportion of responses in the highest two bands of significance/applicability). The results suggest a moderate to significant organisational impact from course attendance.

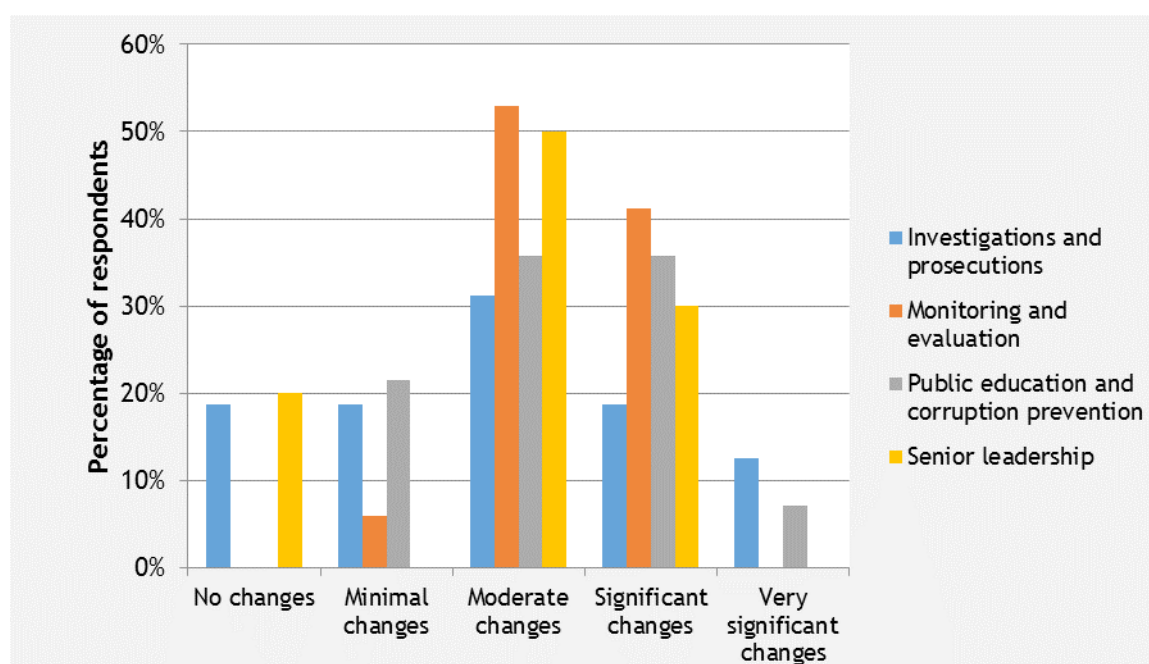
Figure 3.2 represents the responses for organisational benefit set out in Table 3.1 when analysed over the four principal courses operated during the survey period.

Changes made to procedures and/or processes as a result of suggestions made by respondents arising from knowledge gained at their training courses included:

Investigations and prosecutions:

- adopted financial investigations in every corruption-related investigation,
- aligned case management protocols to achieve consistency between police and investigative officers,
- improved number, quality and timeliness of prosecutions,
- improved working relationships between investigators and prosecutors and between government agencies,

Figure 3.2 Changes made in organisations' procedures and/or processes following suggestions made by CAACC course attendees



- introduced investigative plans and file management,
- established a central database of those interviewed;

Monitoring and evaluation:

- undertook a national survey which resulted in the development of data collection and reporting tools for all aspects of our work,
- developed monitoring and evaluation frameworks, units and monitoring systems,
- commenced institutional capacity assessments,
- implemented strategic planning,
- improved development of the strategic plan;

Public education and prevention:

- established a new public outreach programme in close partnership with a civil society organisation,
- improved the education syllabus,
- improved engagement with stakeholders, including the media;

Senior leadership:

- amended the Anti-Corruption Act,
- re-engineered processes (reducing standard time frames),
- undertook a strategic planning session based on training,
- held management meetings more regularly.

Figure 3.3 demonstrates that respondents had reasonably high expectations that the organisational changes resulting from the training courses would be sustained (data is analysed over the four principal courses operated during the survey period).

3.3.4 Post-course networking

Only 20 per cent of respondents reported frequent networking with fellow participants following course completion. This is not insignificant but further thought could be given to encouraging this activity.

3.3.5 Respondents' overall satisfaction with the Commonwealth Africa Anti-Corruption Centre (CAACC)

Respondents reported a high level of satisfaction with the CAACC, as presented in Figure 3.4.

Figure 3.3 Expected sustainability of procedure/process changes initiated by respondents after course attendance

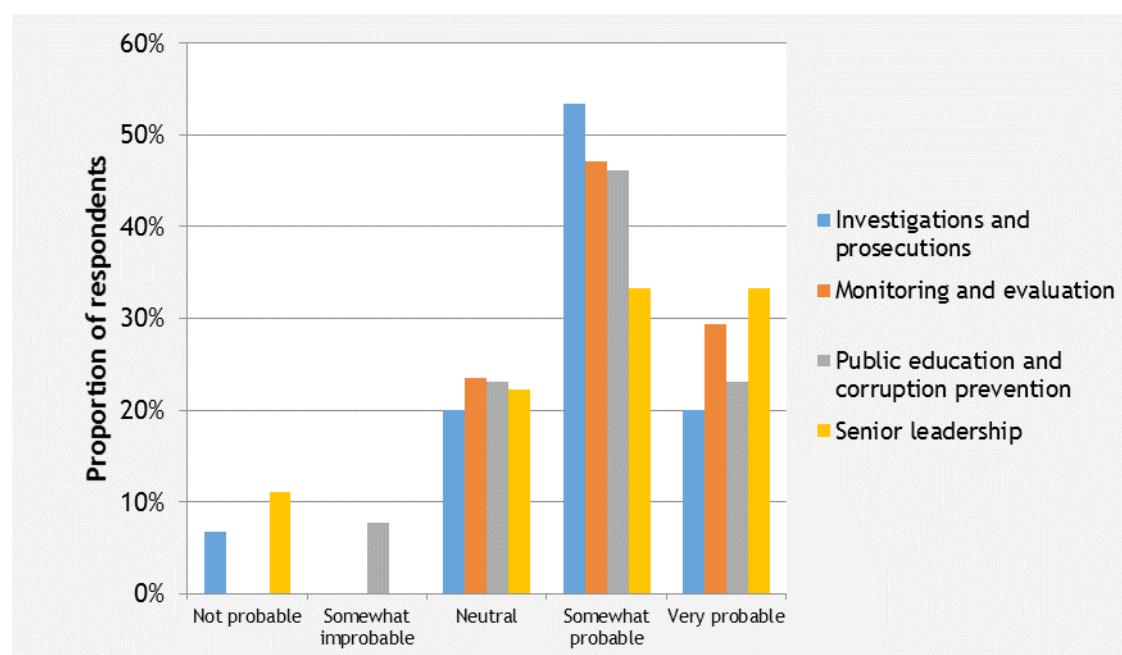
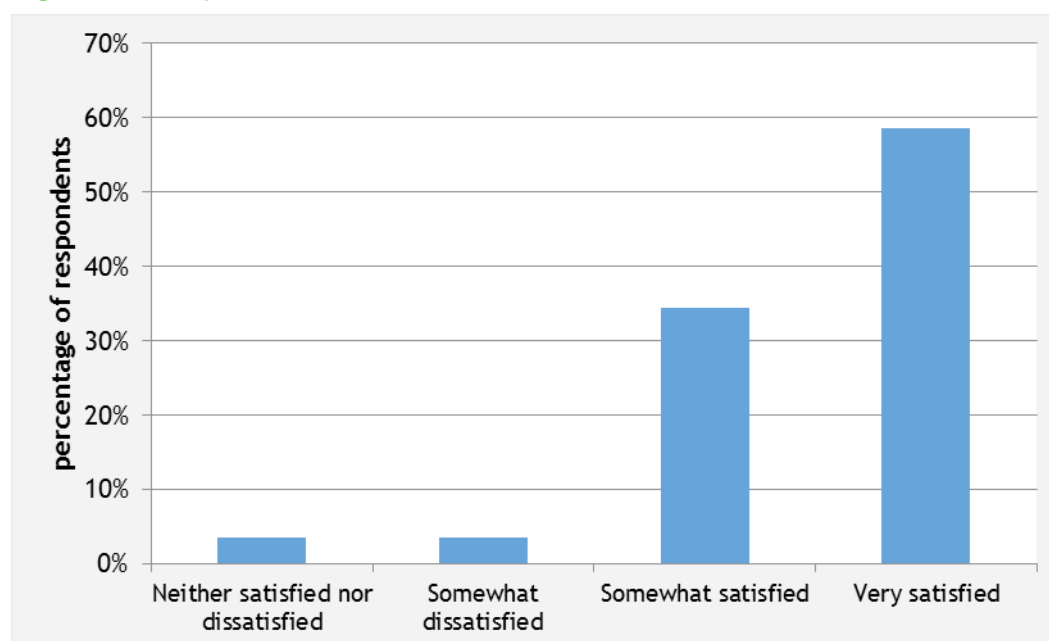


Figure 3.4 Respondents' overall satisfaction with the CAACC



Respondents did provide some criticisms of CAACC courses. These included the following:

- material was rushed;
- country presentations took up too much time;
- there were no translators;
- the quality of training experts varied;
- the number of courses should not be reduced from that originally proposed.

3.3.6 Commonwealth Africa Anti-Corruption Centre learning issues

Respondents were asked to provide specific comments or suggestions about CAACC learning activities in relation to their preferred learning methods. Formal courses or workshops were preferred by 60 per cent of respondents, whereas 40 per cent of respondents preferred some form of online learning. Preferences for future types of learning included:

- online sharing of education and prevention tools;
 - refresher courses on all topics;
 - online mentoring;
 - online sharing of information on investigations;
 - exchange programmes and visits with more advanced ACAs to learn from their experiences;
 - web-based seminars;
 - running courses in different countries.
- Preferences for future course content included:
- investigations;
 - risk assessments for ACAs;
 - prevention (productive partnership with stakeholders, sustainable prevention initiatives) and investigation (exhibit handling, effecting an arrest procedure, searching persons, collecting and presenting evidence);
 - measuring progress;
 - topics for operational staff, public educators and prevention officers;
 - management/leadership for various staff levels;
 - training of trainers on ethics and integrity;
 - complex issues, such as the use of virtual currency;
 - forensic investigation;
 - dealing with corruption related to cyber- or technology crime.

Several comments were also received about what the role of the CAACC should include.

These included:

- acting as a facilitation centre for training, networking, asset identification, tracing and identifying suspects and other cross-border anti-corruption activities;
- conducting research/studies on corruption and its associated impacts, for example corruption and security and stability, corruption and social disintegration, corruption and re-colonisation.

In conclusion, the online survey suggests that CAACC courses significantly improve the personal capacity of respondents and contribute moderate to significant improvements in the operations of ACAs. The survey also points to demand for additional training across a wide range of anti-corruption activities using a variety of training vehicles reflecting the complexity of the anti-corruption continuum.

3.4 Collaboration within the Commonwealth Secretariat

The evaluators interviewed Secretariat staff to understand the internal linkages that support its anti-corruption policies and activities and, in particular, the general relevance of the Secretariat's designated anti-corruption activities to its other spheres of interest and the potential contribution that they could make to the development of an anti-corruption strategy.

3.4.1 Broader activities relevant to the Commonwealth Anti-Corruption Africa Programme

All the Commonwealth Secretariat advisers and Officers that were interviewed had some interest in the anti-corruption agenda. One of the advisers interviewed offered the opening remark that the anti-corruption agenda was very broad and could cover anything that the Secretariat does. We would agree with that. Our task, insofar as the Secretariat is concerned, is to identify the best way of accessing that potential contribution, while preserving the necessary space for other essential objectives.

A diverse range of examples taken from Rule of Law Division concern fundamental constitutional guidance (the Commonwealth (Latimer House)

Principles 2003 and the Limassol Judicial independence principles), a model statute addressing appropriate conduct for public officials (Integrity in Public Life Act 2016), the creation of practice-based mechanisms (legal exchange to facilitate sharing of work on law making and codes of conduct) and mentoring arrangements (the Samoan prosecution service). These are supported by a range of toolkits, presentations and state-specific advice. There are also links between sections on anti-corruption issues, such as the Elections section and Rule of Law concerning parliamentary oversight. Rule of Law team were aware of the AAACA and appreciated the potential for closer relationships with the ACAs that had prosecutorial responsibilities; however, it was not sufficiently informed to explore the possibility of closer working.

The Youth Division is engaged in exemplifying good practice through the governance arrangements of youth councils so that this experience can be used as a model for public administration when those interested in public service enter public life in the adult world. The Youth Division is interested in obtaining an anti-corruption contribution to the Youth Programme's good governance practice work. There is, for instance, a problem of institutionalised corruption in sport.

Elections team in Political Affairs Division were concerned not to infringe onto the preserve of the Anti-Corruption programme, but were concerned with setting safeguards regarding the conduct of elections, financing, vote counting, the announcement of results, misuse of state funds for campaign purposes, abuse of state facilities in elections, abuse of state media for campaigning purposes and co-opting state officials into political activity during elections. It is also clear that elections can provide the basis for grand corruption involving the successful candidates and their political backers.

The Strategic Planning and Evaluation Division team in charge of results, monitoring and reporting have been engaged in revising performance arrangements to provide more rigour in performance assessment to programme activities. They are potentially capable of offering valuable insights to those seeking to extend performance management to anti-corruption programmes and to incorporate such mechanisms into results-based funding proposals. This team

had given a presentation to CAACC staff, but they had not received a response to their offer of further support.

The Public Financial Management work has a broad and highly relevant remit that covers audit oversight, procurement and financial systems, all of which lie at the heart of the anti-corruption prevention agenda. The advisory work in this area overlaps with the Anti-Corruption portfolio, requiring deeper collaboration.

It should be noted that the education and health divisions clearly represent sectors that are affected by corruption. They witness corruption and have an interest in supporting its reduction.

In seeking to explore the extent to which the Secretariat uses governance indicators that may have a relevance to her work, the Political Affairs team have established a working group of advisers, including the Anti-Corruption Adviser, to develop a project brief to research this issue. This alone suggests that, to date, the workings of the Secretariat have been quite compartmentalised and not very open to sharing and internal scrutiny. It also suggests that closer working arrangements are entirely feasible.

This report intends not to set out a comprehensive survey of the shared interest in corruption within the Secretariat but to demonstrate that it exists and to suggest, at this point, that there may well be value in exploring the extent to which this shared interest may be exploited to greater effect than is currently the case.

3.4.2 Views on the development of the Commonwealth Anti-Corruption Africa Programme

In considering the conditions necessary for countering corruption, the Elections team offered the view that there must be a strategy for generating political will if change is to happen. This view was shared by others, including Rule of Law. The idea that political will is an important component of change was certainly a clear driver in Rwanda and we shall discuss this later. The Elections team further noted that, despite high-profile commitments made concerning the eradication of corruption, it is often more instructive to observe how elections are conducted on the

ground in local languages. Any true commitment to an anti-corruption policy must be tested by more than a cursory review of major speeches.

One of the Political team in charge of Africa was of the view, nevertheless, that anti-corruption in Africa is a big election issue. Governments are being chosen, to some extent, on the basis of their anti-corruption agendas: 'if the Secretariat has an offering on this subject then that is a big deal'.

Rule of Law suggested that one must think beyond the confines of the Commonwealth, at times, to find ways of working that are effective. It could be said that this is also relevant to donor funding models and other forms of professional collaboration. Rule of Law also suggested that, once people see the prevalence of corruption and its effects, they can come to believe that all undesirable events have their origins in corruption; they do not look elsewhere, can be in a constant state of agitation and create a situation that is close to being out of control. This view was reflected by public officials, who reported that, once complaints mechanisms were established, a torrent of adverse comment was then received, much of which could not possibly be correct. This is clearly a major detrimental aspect of corruption: it provides a comprehensive scapegoat for frustrated ambition and heightens social tensions.

The Elections team suggested that anti-corruption work has the potential to conflict with the sovereignty of the state when it puts into question a state's freedom of action. Recommendations on electoral procedure are usually found to be the most readily acceptable aspect of electoral reform, while proposals for constitutional change are least readily acceptable. Views from the field suggested that constitutional change that fell short of what was required was difficult, if not impossible, to reverse and, for that reason, it was particularly important when making constitutional changes to adhere to high principles.

The Monitoring and Evaluation team suggested that the UN Sustainable Development Goals and, therefore, the Strategic Development Indicators, had been developed as a core contribution to national development planning. They provided the reasons for combating corruption and the guiding principles. There was little room left for additional anti-corruption proposals.

In Public Financial Management (PFM), the Adviser noted that states that had their own routemap to PFM reform, which was developed could steer their reform and so that they could tell development partners what they wanted. It is believed that this provided a more coherent development strategy. We agree that local success requires local plans that embrace local aspirations, capacity and development opportunities.

The Education team had been engaged to develop the education and health hubs and suggested that digital training systems might include videos, digital format course material and online assessment centres in massive open online course (MOOC) format, as used by the Open University in the United Kingdom. This proved to be a universally shared view in later field visits. The responsible Adviser was rightly cautious about digital infrastructure standards throughout Africa, although we shall suggest a fairly robust approach to this problem.

3.4.3 Gender

The PDD for the CAACC of February 2013 noted that the project should lead to a substantial increase in reporting of corruption by women; minimum female participation rates would be included in CAACC activities and colloquia on corruption would address gender perspectives, although this is not a direct gender-specific intervention. Gender is a cross-cutting theme for the Secretariat, and the Gender team are interested to learn of progress on these issues.

We found that to date, such data has not been collected on a systematic basis. This is probably more of a reflection on the problems faced by the CAACC in obtaining agreement from ACAs on the collection of data and the creation of a central database than a deliberate flouting of the gender data collection objective. The Gender team will no doubt seek to engage with the relevant issues and provide guidance.

4. International practice

This chapter seeks to provide a brief assessment of the overall programme strategy and its alignment to relevant guidance provided by recognised international development organisations.

UNCAC 2003 defines its purpose as being 'to strengthen measures to prevent and combat corruption more efficiently and effectively' and it seeks to do this by promoting 'integrity, accountability and proper management of public affairs and public property'. This is a very broad agenda. There are numerous other guidelines and conventions concerning corruption developed by numerous international bodies, including the

African Union, the OECD, the World Bank and the IMF, but UNCAC is now generally regarded by many as the touchstone for discussion of this subject. The others are broadly consistent with it although often more limited in scope. We suggest that if the Secretariat is to consider how its approach reconciles with international guidance then UNCAC should be the starting point of that enquiry.

Table 4.1 Anti-corruption measures prescribed by UNCAC

Aspects	Requirements
Law	Develop and implement legal principles and anti-corruption policies to ensure the rule of law; proper management of public affairs and public property; integrity, transparency and accountability; the criminalisation of bribery and trading in influence; and establishment of the ownership of unexplained assets
Public officials	Develop appropriate systems for recruitment, retention, training, promotion and retirement of civil servants, based on efficiency, transparency, merit, equality and aptitude
Elected officials	Ensure appropriate funding of candidates and parties, prevention of conflicts of interest, declarations of outside interests, employment, assets and gifts
Public financial management	Take appropriate measures to promote transparency and accountability, including budgets, reporting on revenue and expenditure, accounting and auditing standards and oversight, risk management, internal control and systems of corrective action
Procurement	Introduce appropriate procurement systems, including competition, public information on procurement, tendering rules and screening provisions
Judiciary	Secure independence, integrity and proper conduct
Raising awareness, access to information and the media	Promote participation in the fight against corruption by individuals and groups outside the public sector and actively facilitate this by disseminating knowledge about corruption; offering access to information; conducting public information activities; promoting and protecting the publication and dissemination of information concerning corruption; and publishing information
Private sector	Enhance accountability to prevent corruption, including requirements with respect to cooperation with law enforcement; codes of conduct; transparency; proper behaviour with respect to public sector regulators and licensing authorities; and the maintenance of appropriate records
International collaboration	States to support international collaboration in corruption investigations and to criminalise bribery by and of nationals abroad
Other measures to prevent corruption	Protection of witnesses and whistle-blowers, measures to recover assets and prevention of money laundering

Table 4.2: Coverage of the anti-corruption agenda

No	Coverage of the Anti-Corruption Agenda	UNCAC provision	Proposed by other organisations	Covered by Anti-Corruption Africa Programme	Covered by other Commonwealth Secretariat Division / Units
1.	Separation of powers		x		x
2.	Sound systems of ministerial delegation		x		
3.	Good PFM systems	x			x
4.	Effective oversight arrangements, including external audit	x			x
5.	Recruitment and promotion on merit	x			
6.	Codes of ethics (ministers and public servants)	x			x
7.	Capacity development:				
7a.	Staff training on the need to combat corruption	x			
7b.	Training for ACA experts in investigation, prosecution and the general public	x		x	
7c.	Training for non-ACA experts in investigation	x			
7d.	Training for non-ACA prosecutors	x			x
7e.	Civil Society and NGO sensitisation to combating corruption	x		x	x
8.	Complaints procedures		x		
9.	Transparency of policy, budgets, expenditure and procurement	x			x
10.	Procurement systems	x			x
11.	Freedom of the press and other media	x			
12.	Elimination of unnecessary regulation		x		
13.	Strong investigation and prosecution systems				x
14.	Significant penalties for corruption	x			
15.	High judicial standards	x			x
16.	Money-laundering and asset recovery	x			x
17.	International collaboration	x			
18.	Periodic review of arrangements	x		x	

4.1 Provisions of the UN Convention against Corruption

A brief survey of the measures prescribed by UNCAC as being relevant to combating corruption is set out in Table 4.1.

The limitations of this brief evaluation do not permit a more extensive survey of international views and practice to be developed but it is suggested that the above represents a fair coverage of the subject for the purposes of this evaluation.

We are aware that there is currently limited research evidence for the effectiveness of factors deemed likely to contribute to reducing corruption. Good PFM has some claim to success but the evidence is patchy. Research has recently been commissioned into the way in which different measures can work together to good effect and the outcome of this research is awaited with interest. Strictly observed and calibrated research is certainly challenging in this complex field.

4.2 Coverage of the anti-corruption agenda

The UNCAC provisions, together with a few additional measures that were advocated by those interviewed, are set out below and compared with the Anti-Corruption Adviser's remit and the more wide-ranging Secretariat activity, as shown in the table below:

We also consider that significant importance should be placed on sound public sector management skills; the absence of these can impose very considerable limitations on the effectiveness of the measures described above. These skills encompass a range of capabilities that are difficult to define. These can be described as in broad terms as the following:

- clear instructive leadership and ethical behaviour (politicians and officials);
- a sound grasp of personal roles and responsibilities;
- the ability to foresee the implications of actions and events;
- the ability to give and receive good advice;
- the ability to select and direct others to achieve a given outcome;

- the ability to inspire others to creditable achievement;
- the ability to understand the workings of administrative systems and how to improve them;
- the ability to understand and frame agreements;
- the determination and capacity to work tirelessly to eradicate corruption;
- the development, over time, of reasonably sophisticated approaches to delegation.

We consider that, where reform programmes are implemented by those lacking these qualities, such programmes are likely to underperform to a significant degree.

It is notable that various major authorities have argued that the implementation of anti-corruption reforms requires state-specific programmes that address the character and the capacity of individual states. The development of reform programmes must, in our view, be particularly attentive to this consideration.

5. Evaluation summary

This chapter provides an evaluation of the anti-corruption activities sponsored by the Commonwealth Secretariat, employing the criteria prescribed in the TOR, except that recommendations for consideration in the next phase (part of requirements (vii) and (viii)) are set out in Chapters 6 and 7. It is particularly relevant to this chapter that there is no formal anti-corruption strategy, plan or programme. Where these terms are used, they are used as implied by the CAACC PDD and/or inferred from the actions of the Anti-Corruption Adviser.

5.1 Relevance

Requirement (i): Assess the extent to which Secretariat support was relevant to the priorities of member countries and consistent with the Strategic Plan

The anti-corruption priorities of member countries are effectively addressed in section 1.10 of the CAACC PDD, which outlines the challenges faced by agencies that were identified in discussions with the heads of agencies and through a Commonwealth assessment.

The Secretariat's anti-corruption activities are set out in intermediate outcome 2.6, which describes the 'improved public administration' of the Secretariat's Revised Strategic Plan (2013–14/2016–17), in which it was proposed that the Secretariat would provide assistance to member countries to create and sustain effective, accountable and transparent institutions in four key areas at the centre of government; anti-corruption is one of these areas. ACAs are one of nine types of public institutions that aim to achieve this latter outcome. The Revised Strategic Plan defines key areas on which emphasis will be placed, namely institutional strengthening; enhancing human capital development; development of new and improved systems, technology and processes; and building professional networks.

In 2013–16, the Secretariat provided support for activities undertaken by the CAACC and the AAACA, as well as funding activities undertaken by the Secretariat's Anti-Corruption Adviser and the CAACC's technical expert.

5.1.1 Relevance of project design

Formal project design processes were undertaken for the proposed activities of the CAACC and the CAACC technical adviser. The design logic of the CAACC PDD was relevant, as it sought to align Secretariat support to previously agreed Commonwealth African countries' anti-corruption priorities and was consistent with the broad objectives of the Secretariat's Revised Strategic Plan, as discussed in the previous section.

The outputs, outcomes and impacts outlined in the Theory of Change (TOC) for the CAACC, as presented in Figure 3 of the CAACC PDD, were robust with regard to the purpose of the proposed CAACC activities and planned project funding. In addition, the CAACC PDD incorporated a risk assessment. The material risk factors that were likely to be encountered in the establishment and operation of the CAACC were identified. The ToR for the CAACC technical expert were consistent with the planned outputs presented in the CAACC PDD. The design of the project was, therefore, very relevant to the circumstances prevailing in Commonwealth Africa in an anti-corruption context.

5.1.2 Relevance of actions undertaken

The Secretariat's Anti-Corruption Adviser was instrumental in the provision of the Secretariat's managerial input to the CACAP. He provided the majority of the short-term inputs contributed by the Secretariat to the various CAACC training courses and the annual conferences held in the period being reviewed that have addressed some priority anti-corruption needs. He has also undertaken a significant co-ordination role for the CACAP and provided relevant anti-corruption inputs in other Commonwealth countries, for example, Zambia. In addition, the Secretariat's CFTC is currently providing an adviser to the CAACC to assist in the development of training programmes and a number of supporting activities.

Although constrained, the resulting Secretariat funding of CAACC activities in 2013–16 was used to conduct training courses in some priority anti-

corruption areas that were identified in the CAACC PDD. Secretariat support was, therefore, consistent with members' priorities.

The training courses also contributed to human capacity development, systems development and institutional strengthening, as attested by the survey of course participants. The AAACA also undertook activities in some priority anti-corruption areas during 2013–16, particularly networking. References to the sharing of an extensive range of study visits between member countries are detailed in the 2016 AAACA Annual Conference report. These activities, therefore, demonstrate support that is consistent with the Secretariat's Revised Strategic Plan.

The actions by other sections of the Secretariat that were designed specifically to support the CACAP were relatively limited. It could be said, however, that the work of the PFM Adviser in relation to supreme audit and internal audit functions, rule of law advisers in relation to model acts and the support of prosecution services, and elections advisers and the work of the Africa Adviser in relation to governance data have all contributed to institutional strengthening that is relevant to the control of corruption and is consistent with the Secretariat's Revised Strategic Plan.

In our view, the Secretariat's support through organisational development and knowledge-building was relevant to members' priorities as represented in the PDD on which the CAACC was based and was consistent with the Secretariat's strategic plan.

Requirement (ii): Assess the extent to which Commonwealth member countries may have benefited from the programme and the tangible outcomes realised

The CAACC PDD and the CAACC Strategic Plan sought to improve the capacity of ACAs at individual and organisational levels. The results of CAACC course evaluations that have been reviewed during this assignment indicated that most course participants considered that the contents of CAACC courses were very relevant and very useful to them in their work. This evidence indicates that the CAACC courses assisted course participants in improving their capacity. Field visits also support this view.

The online survey (see Chapter 3 above) probed the subject of benefits in more detail with questions investigating the extent of benefits that respondents and their organisations may have gained following attendance at CAACC courses. The survey evidence points to a high level of overall satisfaction with the contribution of different CAACC courses to material improvements in the personal capacity of respondents. The following points reflect this satisfaction:

- At least 80 per cent of all respondents considered that CAACC courses had expanded their knowledge at least significantly.
- At least 70 per cent of all respondents reported a significant improvement in their ability to perform their current roles.
- At least 68 per cent of all respondents reported making significant changes in their work after returning from their CAACC courses.

In addition, at least 60 per cent of all online survey respondents reported engaging in a significant level of sharing of the ideas that were gained at their courses with their colleagues following their return to their offices. It is evident that a considerable number of CAACC course participants improved their personal capacity significantly.

Survey respondents also indicated that knowledge gained from the training courses helped them to contribute to changes in their organisations' procedures and/or processes. Although survey evidence indicates that the CAACC courses have contributed to material improvements in ACA's organisational capacities, there is insufficient evidence to quantify the extent of these improvements.

We have been unable to quantify the institutional benefits gained from the above activities or from the study visits referred to under requirement (i), given that no performance framework has been established to capture and assess the necessary data. We have therefore relied on our personal judgement, which is based on the documentation, and on personal interactions with those involved to reach a conclusion on this requirement.

In our view, Commonwealth member countries have benefited significantly from CACAP through the enhancement of individual and ACA

organisational capacity. The course participant survey and the proceedings of the AAACA Annual Conference 2016 provide good evidence for this.

Requirement (iii): Assess the overall programme strategy and its alignment to relevant guidance provided by recognised international development organisations

It can be seen from the earlier sections of this report, as summarised under requirement (i), that there are no clear Secretariat strategies or programmes for its anti-corruption activities. There is a PDD for the CAACC and this contains a variety of activities that are relevant to Commonwealth Africa. This has guided the Secretariat's contribution in this field, as discussed above, but the Anti-Corruption Adviser's attention is now turning to other regions and Secretariat seed corn funding for Commonwealth Africa is coming to the end of its final year. It is becoming clear, therefore, that the CAACC strategy is not adequate to support the changes in relationships and responsibilities that are required for the continued development of anti-corruption activities in Commonwealth Africa or to support the Secretariat's broader interests in the control of corruption across the Commonwealth as a whole. A difference in perspective has emerged, which must now be recognised.

The brief introduction to the elements of international guidance and practice that are relevant to anti-corruption activities, as set out in Chapter 4, demonstrates that these cover a far broader scope than the range of work the Anti-Corruption Adviser could hope to achieve under current arrangements and with existing resources. It is notable, however, that there is significant expertise within the Secretariat that covers many additional aspects of international guidance; examples of this are set out under requirement (i). The level of commitment that the Secretariat will be able to invest in this field of activity in the future remains to be seen.

In our view, the Anti-Corruption Adviser has made great strides in developing the CAACC and the AAACA on a very limited budget and has gained a strong reputation among the ACA community, which is to the credit of the Commonwealth Secretariat. This has, however, been achieved without any formal overall anti-corruption strategy for the Secretariat. We strongly suggest that explicit anti-corruption strategies and programmes should now be developed to address the Secretariat's

commitment in this field, whatever that may be, together with separate regional strategies that recognise regional differences in perspective, ownership and governance. Such strategies will require their own financial assumptions that must be clearly established and validated.

5.2 Efficiency and effectiveness

Requirement (iv): Evaluate the efficiency and effectiveness of the Commonwealth Africa Anti-Corruption Centre as one of the core delivery components of the programme and whether or not this model can be replicated in other Commonwealth regions

5.2.1 Efficiency

The overall level of efficiency achieved by the CAACC during 2013–16 has been suboptimal. The CAACC's efficiency, in terms of timely implementation of project activities, has been materially constrained because the level of funding that has been provided by the Secretariat has been considerably less than that expected in the PDD. The PDD included a sum of up to £250,000 to be provided by the Secretariat annually over the 4-year period 2013–17. As of 30 June 2016, the Secretariat had provided £450,000 to the CAACC during the period 2013–16, compared with an expected figure of £750,000. This budget shortfall resulted in inevitable repercussions.

In response to the financial shortfall, the Anti-Corruption Adviser took the view that he should adopt a selective approach to the planned outputs. As a result, more than a third of the outputs that had been proposed in the PDD were either not delivered or delivered to a minimal level. Details of the CAACC's output performance in comparison with the outputs proposed in the PDD are presented in Annex 1.

The lack of a centre manager at the CAACC in 2013 and for part of 2014 had a negative impact on the CAACC's overall efficiency. The difficulty experienced by the CAACC in forging a strong working relationship with the ACAs on the collection of information relevant to the development of their services also affected overall efficiency.

Efficiency, in terms of the active monitoring of CAACC activities, has also been relatively poor. Delays have been experienced in annual financial reporting. The detailed monitoring that was envisaged in the PDD has not been achieved.

5.2.2 Effectiveness

Notwithstanding the CAACC's disappointing performance from an efficiency perspective in some respects, the organisation's effectiveness has been relatively strong in terms of its core function of providing well-received and impactful course delivery, despite the budget shortfalls. Evaluation reports submitted by CAACC course participants at the conclusion of their training courses were generally favourable. The results of the online survey also demonstrate that CAACC training courses have been effective and have contributed to the partial achievement of two of the CAACC's major goals. As yet, there is little evidence of significant mainstreaming of the Secretariat's three cross-cutting issues: gender, youth and human rights. These were to have been pursued in collaboration with the Secretariat's Social Transformation Programmes Division, Youth Division and Human Rights Unit.

5.2.3 Replicability

Currently, the CAACC has only partly achieved its objectives, as a number of proposed activities have been implemented either only in part or not at all as a result of funding constraints and insufficient strategic direction.

The field visits and the online survey demonstrated a very high level of demand for activity to build anti-corruption capacity. To date, there is limited evidence of development partner interest in funding such activity and limited enthusiasm from ACAs to pay the subscriptions agreed to replace Commonwealth funding once it is withdrawn. These issues must be considered further before any firm decision can be made on replicability; however, it is clear that a less costly model would be preferable (see also requirement (vi)).

In our view, courses have been very well received and appear to have been highly effective, although the efficiency and effectiveness of the CAACC has been hampered by the lack of agreed resources from the Secretariat and the challenge of establishing working relationships with the ACAs. It is considered inappropriate to attempt to

replicate the CAACC in other regions at present, given current financial constraints. Alternative approaches to developing anti-corruption capacity elsewhere should be explored.

5.3 Collaboration

Requirement (v): Assess the level of collaboration between the Secretariat, the Government of Botswana and anti-corruption agencies

There has been extensive collaboration between the Secretariat and the Government of Botswana, particularly the DCEC, which has immediate oversight of the CAACC. The quality of the latter collaboration has been constrained at times by difficulties arising from delays in financial and non-financial reporting by the CAACC and the release of funds by the Secretariat. This has affected the CAACC's efficiency, as noted above.

The Secretariat has had regular contact, with most ACAs via the Anti-Corruption Adviser, mainly through his general CAACC course presentations at annual conferences and through seminars that have been delivered to individual states, usually at their own expense. Inevitably, there have been differences in levels of collaboration. Other advisers have visited governance institutions in member countries but have not visited the ACAs to our knowledge.

The Government of Botswana has, in general, had a reasonable overall level of collaboration with other ACAs via the DCEC, but the level has varied. Collaboration levels have been highest when study visits have been undertaken between the DCEC and other ACAs. The CAACC's levels of collaboration with ACAs other than the DCEC have been relatively modest overall.

Evidence suggests that the levels and varieties of collaboration between individual ACAs appear to have been relatively modest overall. It has usually been associated with study visits and, in this particular respect, the proceedings of the AAACA Annual Conference 2016 suggest that there has been a significant level of interagency exchange in the previous year. At present, it appears that there may be a little more activity between some East African ACAs than between ACAs elsewhere.

Table 5.1 Percentage of significant and very significant changes reported

Training Programme	Knowledge improvement (level II) (%)	Performance improvement (level II) (%)	Personal development (level III) (%)	Business improvements (level IV) (%)
Investigations and prosecutions	87	80	67	50
Monitoring and evaluation	83	82	88	59
Public education and corruption prevention	86	71	64	57
Senior leadership	89	78	78	67

Recently the Research Coordinator has sought to obtain information from ACAs to help improve the CAACC's research support to ACAs and to develop training courses, but responses have been limited (see requirement (iv) above). The CAACC Communications and Political Affairs Coordinator plans to discuss this problem with ACA liaison officers.

Neither the CAACC nor the AAACA has undertaken any major initiatives to promote networking activity outside the annual conferences. To date, no details of lessons learned from peer reviews or any reference to networking have been posted on the CAACC website.

This assessment has been hampered by the reluctance of 10 ACAs to respond to requests for online interviews or to return the networking questionnaire that was issued by the evaluation team. To date, we have visited or otherwise communicated with the following: the Secretariat, the Government of Botswana and ACAs in Ghana, Lesotho, Mauritius, Rwanda, Seychelles, South Africa and Tanzania. However, only some of these have returned the networking questionnaire.

In our view, there is a good working relationship between the Secretariat and the Government of Botswana, despite the shortfall in the Secretariat's financial contributions to the CAACC. Networking is taking place between ACAs, although the 'vibrant network' sought by the Centre's strategy has not been developed. We consider that there is a clear case for creating a greater range of professional development activities throughout the region to provide more intensive support to the control of corruption.

5.4 Value for money

Requirement (vi): Assess value for money

Value for money is the difference between the total benefit derived from a good or a service in relation to its total cost, when assessed against some agreed standard over the period in which the goods or services are used. According to Kirkpatrick's classic model on '*Techniques for Evaluating Training Programs*' (1979), training can be evaluated at four progressive levels: learner's reactions to courses at level I are given in narrative form; quantified economic benefits can be measured at level II (i.e. what was learned); changes in behaviour when learners return to work after training can be measured at level III; and business outcomes that occur because learners are doing their jobs differently can be measured at level IV. Although no formal benefit analyses of CACAP activities are available, the online survey of CAACC respondents included several questions that point to possible significant level II, III and IV economic benefits that have arisen from respondents attending CAACC courses.

Details of the responses from the online survey respondents in respect of gains at levels II, III and IV and benefits gained from the principal CAACC training courses are presented in Table 5.1.

In addition, heads of agencies reported that they found AAACA annual conferences beneficial. Although cost information is not currently available for all courses or all course modules, it is considered that the majority of CACAP expenditure was on CAACC training programmes; however, the available financial information is very limited. No CAACC accounts for 2013–16 are available. No data for the Government of Botswana's actual total contribution in this period is available.

We estimate that the Secretariat has spent approximately £100,000 per year in recent years on the CAACC for what might be considered training-related purposes. The PDD for the CAACC included provision of £150,000 per year as the Government of Botswana's contribution. However, the CAACC Annual Report for 2014–15 quotes a figure of £277,000 for staff, accommodation and sundry costs. In recent years, the CAACC appears to have received about 150 course participants per year, although the data regarding course attendance is incomplete. The cost per place may, therefore, be in the region of £1,600 (or £2,600 based on the 2014–15 report) and the annual budget of the CAACC may be approximately £250,000 (or £377,000 based on 2014–15) for training, with a further £20,000 from the Secretariat for other expenditures. We have no reliable comparative information for similar training academies around the world.

In our view, significant benefits have been received at individual and organisational levels from CAACC courses and favourable reports have been received about the AAACA annual conferences; however, the lack of comparative costs, economic benefit data (requiring a more in-depth collaborative study) or other pre-set value criteria hinders an authoritative assessment of value for money. It could be said, however, that, with course costs in the region of £2,600 per place, a contingent of only 150 course participants per year and a shortage of ready financial support, a more cost-effective approach is required.

5.5 Programme alignment

Requirement (vii): Assess the level of linkages that exist within the Secretariat on broader anti-corruption programming and how these can be strengthened or aligned

The present direct linkages within the Secretariat on anti-corruption broader programming appear relatively low. Anti-corruption broader programming is driven principally by the Secretariat's Anti-Corruption Adviser, who does not have material day-to-day operational linkages with other parts of the Secretariat. This outcome is not surprising for several reasons.

- The CACAP is not formally defined as a Secretariat programme for the Commonwealth as a whole. The formal arrangements are confined to the role of the Anti-Corruption Adviser and involved the preparation of a PDD, strategic plan and TOC for the CAACC. The Secretariat's continuing commitment was to provide seed corn funding, which expires in the current year. In practice, the Anti-Corruption Adviser has continued to support the CAACC, and his participation in other regions has been limited. The references to the anti-corruption work described in the Secretariat's Revised Strategic Plan are limited to a fleeting reference within the 'public administration' section of the 'public institutions' programme, which indicates that anti-corruption activity currently takes a relatively minor position.
- We are not clear that the Secretariat is a generally collaborative environment. It may be that the demands of individual briefs and limits on resources have led to a culture in which advisers are expected to conserve their resources by avoiding overlapping activity and mutual support arrangements, although there is one example of a recent collaboration that does not fit this pattern.
- The Secretariat's current budget constraints tend to restrict additional anti-corruption initiatives. This is not an absolute constraint, by any means, although recent doubts about the capacity of the Secretariat that were expressed in the DFID's recent Multilateral Aid Review now present additional hurdles to the possibility of supplementing the Secretariat's resources through external sponsors. Opportunities for greater internal collaboration are, however, clearly set in a testing financial context.

In our view, we consider that collaboration is limited and that it would be beneficial to strengthen internal linkages, particularly if the anti-corruption agenda is to achieve higher prominence in the Secretariat's offering to the Commonwealth. The demands on limited resources must be addressed through the prioritisation of objectives and ground rules for engagement.

5.6 Issues, challenges and lessons learned

Requirement (viii) Identify issues, challenges and lessons learned and make recommendations for consideration in the next planning phase (recommendations for consideration in the next phase are described in Chapters 6 & 7)

5.6.1 Issues

The most significant planning issues to be addressed are the development of a Commonwealth Anti-Corruption Strategy to guide the Secretariat's future anti-corruption activities, the future roles of the CAACC and the AAACA, the identification of appropriate funding sources and the development of an appropriate financial strategy to support the various Commonwealth anti-corruption activities.

The current CAACC and AAACA governance arrangements have not resulted in broad-based stakeholder engagement with either of these bodies. It is our understanding that a recent assessment of ACA capacity-building needs has not addressed individual employee needs; in contrast, it has addressed the adequacy of ACA support systems. There is no detailed methodology currently available to assess the capacity-building requirements of individual employees in ACAs at detailed levels or the relative performance levels across the extensive range of anti-corruption activities that are undertaken by agencies.

Discussions with the heads of ACAs and course participants' comments from the online survey point to significant demand for further training across a wide range of anti-corruption activities, including an urgent need for rigorous training in the use of ICT in investigations and practices that are relevant to asset management.

5.6.2 Challenges

The major challenge faced by the Secretariat is to determine how it can use its available resources most efficiently to improve the capacity of the Commonwealth's Africa anti-corruption activities. This process should be undertaken bearing in mind that funding effective anti-corruption interventions should result in relatively favourable investment returns on any expenditure made.

CAACC budgeting, financial reporting and monitoring performance has generally been unsatisfactory to date and this places constraints on operational capacity.

It is clear that the Anti-Corruption Adviser's remit does not cover the very extensive scope of factors that are relevant to combating corruption. The Secretariat has a great deal of knowledge, skill and experience that could be harnessed to greater effect if this were deemed appropriate.

The capacity building of ACAs is constrained by the absence of shared material, including strategies, risk assessments, performance monitoring and research data, and too little is known of the ACAs' activities, strengths, weaknesses, priorities and readiness to undertake mutual support arrangements. It is clear that there is considerable scope for improvement in the sharing of knowledge between ACAs.

Governance institutions in this field extend well beyond the remit of the ACAs and there is a good case for exploring the possibility of broadening the engagement of state institutions that are relevant to the control of corruption, which would provide better alignment in the field with the wealth of relevant measures that have been identified under section on International Practice (Chapter 4). Broadening institutional inclusion in an anti-corruption strategy would also increase the potential for policy development work in a developing field that offers significant rewards for success.

If additional resources were required to support Commonwealth programmes of anti-corruption activity, then good working relationships would have to be forged with development partners.

5.6.3 Lessons learned

There is a significant and unsatisfied demand for capacity-building activities among agencies and their employees. Anti-corruption capacity building must offer relevant solutions, assist employees at different stages in their careers and address emerging problems. There is a demand for the CAACC's approach to capacity building to be broadened to include a range of online activities.

Agencies urgently require some assistance in establishing monitoring and evaluation systems to a reasonable standard, including assistance with the necessary technology.

The CAACC could be a relevant anti-corruption resource for other governance institutions and could help to facilitate closer working relationships in the field between governance institutions.

Results-based funding may be available from some development partners for anti-corruption activities; however, demands for funding must not be underestimated.

Well-targeted anti-corruption support activities can have a beneficial and relatively rapid impact on agencies employees' capacities and agencies' organisational capacities, as exemplified by the experience of Rwanda over the last 10 years.

In our view, depending on the Secretariat's priority and commitment to combating corruption, there are an enormous number of possibilities for extending the range of current activities; these could be expressed in terms of a broad strategy and assembled into an action plan. This could have significant resource implications that would necessitate some development partner involvement and would inevitably require a lengthy timescale.

5.7 Sustainability

General requirement on sustainability:
The ToR request comments on the sustainability of Commonwealth Anti-Corruption Africa Programme activities.

More than 50 per cent of respondents to the online survey thought it was 'somewhat probable' that changes made to procedures and/or processes following their return to their offices would be sustained and more than 20 per cent thought this was 'very probable'. None of the ACA heads suggested otherwise. The CAACC training programme is becoming more extensive and the approach taken to its management and development is considered carefully. In addition, the annual AAACA meetings are well attended, the agendas are increasingly demanding and networking appears to be becoming more prevalent.

In contrast, the initial subscriptions that were agreed by AAACA members have not always been paid regularly and would not be sufficient to replace Secretariat funding even if they were made in full. Any Commonwealth ambitions for engagement in the field of anti-corruption clearly pose a serious financial challenge.

In our view, a good proportion of the results that have been achieved to date and have been the result of CACAP activities are highly commendable. However, to take this agenda forward by increasing the number of course participants, the scope of the subject matter and the range of other development activities, funding will be needed, the source of which has not yet been identified.

6. The Way Forward – a Broader Approach

6.1 Introduction

We have outlined current international thinking on combating corruption in Chapter 4. There is undoubtedly a convergence of views on a core set of measures. When put together, this new agenda is very broad and exacting. Ultimately, the extent to which the Commonwealth embraces a broader frame of reference for this subject will depend on its priority in comparison with the other important issues that represent claims for its resources.

6.2 The three basic issues

We consider that there are three aspects of the development of a new Commonwealth anti-corruption agenda that must be addressed before the content of an anti-corruption strategy for the Commonwealth Secretariat can be determined.

The Commonwealth Africa Anti-Corruption Centre and the Association of Anti-Corruption Agencies in Commonwealth Africa

The first issue is the future ownership of the CAACC and the AAACA. The Secretariat intends to withdraw funding in whole or in part from these institutions this year, which is the end of the current 4-year term. We consider that it is now appropriate to provide them with new governance arrangements that put their future control firmly in the hands of the African member countries of the Commonwealth.

The Secretariat's anti-corruption reach

The second issue is the reach of the Secretariat's ambitions for its involvement in this field and the way in which international views are developing to embrace a range of measures that are far beyond the scope of the ACAs alone. Whatever developments take place in the short to medium term with respect to the CAACC and the AAACA, we consider it unlikely that these institutions will develop to the extent that is necessary to embrace the entire anti-corruption agenda for Commonwealth Africa and, therefore, other

governance institutions should be invited to take part, to secure a broader base for combating corruption. This would be a matter for Commonwealth Africa, but the Secretariat could decide to recommend this course of action.

This extended vision for uniting the governance institutions of Commonwealth Africa to secure critical mass in the drive to control corruption could be matched by similar actions in other regions.

In our view, there is considerable merit in the Secretariat establishing a high-profile stance against corruption in Africa and throughout the Commonwealth. However, effectiveness in this field would require a major commitment by the Secretariat and the full-hearted commitment of a leading cohort of member countries that would be prepared to contribute ideas and resources to develop a credible Commonwealth presence in this field. This would be a very long-term and highly visible commitment.

The Commonwealth Parliamentary Conference in 2005 received a paper entitled 'Framework of Commonwealth Principles on Preventing Good Governance and Combating Corruption', which we understand originated in 1999. The framework described in that paper itemised various aspects of good governance and advised Commonwealth countries to develop their own national strategies to promote good governance and eliminate corruption. It concluded by suggesting that the Secretariat should be ready to assist member countries with policy advice, technical support and information to help them design their own anti-corruption strategies.

We are now taking this one step further by proposing the development of a clearly defined anti-corruption strategy for the Commonwealth Secretariat, together with the development of regionally owned support strategies, starting with Commonwealth Africa, and based on the foundations that have already been laid in that region.

The Secretariat's internal collaboration on the anti-corruption agenda

The third issue is the need for internal collaboration within the Secretariat on the anti-corruption agenda. This is seen as an issue of improving the Secretariat's capacity and readiness to share intelligence and ideas and to act collectively on this agenda as opportunities arise.

These three issues are addressed in more detail in the recommendations in Chapter 7. Taken together, they indicate the need for a new version of the TOC on which current arrangements are based; this is discussed in section 6.3 and is the subject of recommendation 14 in Chapter 7.

6.3 Theory of Change implications

The development of the CAACC in 2013 was based on a TOC model that was set out in the PDD of February 2013. The various activities and expectations set out in the PDD are evaluated in Chapter 5 and Annex 2. It can be seen from this evaluation that not all expectations were met, although the achievements were impressive.

We are of the opinion that, to assist in the creation of new arrangements to address the ideas set out in this report, two new TOC models should now be constructed: one for the development of the CAACC and AAACA and the other for the development of the Secretariat's anti-corruption role.

We consider that decisions about the future of the CAACC and AAACA should be made by the ACAs and possibly by other governance institutions. We find it difficult to understand how these organisations could thrive without Commonwealth Africa taking control of their development. The TOC that underpins them should, therefore, be developed from that perspective.

In terms of the Secretariat's own activities in the field of anti-corruption, it is suggested that the ownership of these activities and, therefore, of the TOC that underpins them, must rest with the Secretariat, although it would be expected to consult a wide range of stakeholders to reach its conclusions.

7. Recommendations

The Secretariat's revised anti-corruption approach

It is proposed that the Secretariat should develop a properly articulated, broad-based strategy and programme for its anti-corruption activities, supported by performance monitoring and evaluation. The strategy should be framed realistically following discussions with the appropriate parties and should include reference to the scope of the Secretariat's continuing support activities for Commonwealth Africa, proposals for the development of anti-corruption support services for other regions of the Commonwealth, proposals for future collaboration within the Secretariat in support of its contribution, and a realistic approach to funding the programme and member countries' anti-corruption activities over the next decade. Proposals in support of these various developments are made in later recommendations.

- **Recommendation 1:** The Secretariat should prepare a properly articulated, broad-based and appropriately funded anti-corruption strategy and programme of activity that will be supported by performance monitoring and evaluation processes.
- group meetings or one-to-one meetings on advanced drafting, once interested parties have been identified;
- access for other advisers to research material and databases that have been developed by the CAACC and other organisations, with potentially relevant work being signposted for them;
- contributions to be sought from the anti-corruption community to other advisers' projects when this is perceived to be relevant;
- contributions to be sought from monitoring and evaluation and from TOC experts within the Secretariat to assist the CAACC and AAACA in developing performance management systems and training, knowledge-sharing and policy strategies for collaboration at regional and individual state levels through courses, seminars and individual consultancy assignments, as resources and demand allow;
- the Secretariat increasingly using digital communication technology to facilitate collaboration;
- occasional presentations and seminars within the Secretariat on corruption issues;
- a Secretariat blog site for use by staff and guest contributors that could reflect developing issues and initiatives, including matters of relevance to the anti-corruption agenda.

Cross-Secretariat collaboration on the anti-corruption programme

A new and more interactive approach to cross-Secretariat working on anti-corruption issues is required. The Secretariat needs to keep abreast of developments and seek ideas, intelligence and fieldwork support, while ensuring that the anti-corruption programme contributes to the success of other Commonwealth programmes. This could include:

- the circulation of outline papers for comment prior to full-scale drafting of major new proposals;
- invitations to other advisers to identify relevant corruption issues for consideration by the anti-corruption constituency and to offer their perceptions of their achievement of targeted anti-corruption outcomes;

It is strongly suggested that these engagements should be viewed as experimental and voluntary wherever possible. They must offer value to all participants and be consistent with the demands placed on staff by the entire programme of work in which the Secretariat is engaged. It is noted that the new structure for the Secretariat brings together Governance, Political and Rule of Law sections within the same division and this could help the development of collaboration between these important contributors to anti-corruption activity, although there are still key areas that lie with other divisions, including Youth, Health, Education and Trade.

- **Recommendation 2:** The Secretariat should adopt a more collaborative approach to cross-Secretariat working. A range of approaches could be utilised in the short term to determine what works best for the anti-corruption programme.

Future responsibility for the Commonwealth Africa Anti-Corruption Centre (CAACC) and Association of Anti-Corruption Agencies in Commonwealth Africa (AAACA)

The Secretariat has invested a great deal of time and effort in helping establish the AAACA and the CAACC. It is suggested that these developments should now be the subject of review by ACA members, at either a special conference or the next annual meeting. It is suggested that they should consider, among other things: (i) the future purpose of the AAACA, its governance arrangements and funding; and (ii) a vision for the CAACC, its governance arrangements and funding.

To assist members to give consideration to point (i) above, it is suggested that the Secretariat may wish to put forward proposals for the following:

- an active executive board and more frequent interchange between members;
- an extended membership of the association that would include other Commonwealth Africa governance institutions contributing to the control of corruption;
- funding arrangements that would make the proposals financially viable, taking account of CAACC issues that arise from point (ii) above, as discussed below;
- making increasing use of new communication technology to facilitate the operation of the agreed arrangements;
- a system of committees, working groups and project teams, composed of governance institution practitioners, academics and others, that would provide executive oversight and develop strategies for knowledge sharing and policy development and deliver the ideas necessary to drive the anti-corruption agenda forward (see also recommendations 4 and 5, below);
- arrangements for sharing expertise and expert systems, for example to support smaller states in improving their capacity to deal with the forensic examination of digital technology.

To assist members to give consideration to point (ii) above, it is suggested that the Secretariat may wish to put forward proposals for:

- a governance structure that would enable the AAACA (possibly in an extended format) to play a more active role in the operation and development of the CAACC, including the specification of capacity development programmes, identifying examples of best practice and establishing useful assignments to be completed between taught modules that would have practical relevance to the workplace;
- a broader range of courses than those currently available (relevant issues are set out in this report) and a student body that extends to other governance agencies;
- support, as necessary, for knowledge gathering and policy development, as referred to above, for example hosting some of the digital infrastructure referred below;
- revenue options to achieve financial viability.
- **Recommendation 3:** The Secretariat should facilitate a meeting of ACA members to determine a way forward for the AAACA and the CAACC. Future developments should not be embarked upon unless there is a good measure of agreement on the issues of future funding and collaborative working arrangements between various stakeholders.

Online networking and learning platform

The Secretariat would seek to encourage the use of digital platforms and new communication technology for the governance arrangements and development work referred to in the preamble to recommendation 3. The more technologically advanced member countries may have to provide leadership initially; however, cost and time demands have demonstrated the limitations of physical meetings. Online communication offers a means of achieving a vibrant network that is capable of generating the momentum necessary to make a meaningful impact across the region within

reasonable period of time. Such facilities could also provide a virtual learning base to deliver courses or substantial elements of courses.

- **Recommendation 4:** The Secretariat should encourage the use of online platforms for knowledge sharing (e.g. anti-corruption strategies, risk assessments, research material and peer review reports), databases of current operational information (e.g. performance data, inventories of expertise and case reports) and collaboration on policy development (e.g. concerning principles, practices, protocols, model provisions and new approaches to controlling corruption) to help combat corruption.
- **Recommendation 5:** The Secretariat should encourage the use of digital communication for syllabus development and for the delivery of training packages via the CAACC.

Learning from others

Some Commonwealth developing nations are engaged in substantial reform programmes. The Commonwealth Africa nations' governance network, as referred to in recommendations 3 and 4, should be encouraged to engage with such reforms and share the learning opportunities that they offer.

Commonwealth Africa should also be encouraged to participate in global anti-corruption research activities, where practicable. As a first step, the Secretariat could approach the British Academy with an expression of interest in the recently established anti-corruption research programme that is funded by the UK government. In doing this, the Secretariat may wish to (1) seek periodic briefings on research progress, thus enabling the Commonwealth anti-corruption programme to share information on these activities with member countries, including Commonwealth Africa, thus enabling such nations to become early adopters of appropriate outcomes (which can be fed into the work referred to in recommendations 3, 4 and 5); and (2) offer to introduce such research programmes to Commonwealth nations as a potential participants.

Several Commonwealth nations operate anti-corruption-related training academies and opportunities should be explored to network these academies and, possibly academies elsewhere, to foster a community of interest in which development experiences can be exchanged and mutual support fostered.

- **Recommendation 6:** The Secretariat should encourage the CAACC, AAACA and Commonwealth member countries generally to forge closer links between Commonwealth member countries that are engaged in substantial reform programmes, to share their learning.
- **Recommendation 7:** The Secretariat should encourage Commonwealth member countries to participate in anti-corruption research activities and become early adopters of research outcomes, where practicable. In the first instance, the Secretariat should make contact with the British Academy to gain an understanding of its current anti-corruption research programme.
- **Recommendation 8:** The Secretariat should forge links between the various anti-corruption training academies within the Commonwealth, and possibly elsewhere, to share development experiences and cooperate in their institutional development.

Focus on smaller states

The Commonwealth Secretariat's draft Strategy Review, which is currently under consideration, suggests that small states present a 'unique value proposition' of the Commonwealth. We agree with this and suggest that the construction of a broader strategy and programme beyond Commonwealth Africa, as envisaged in recommendation 1, should be concentrated, in the first instance, on a general programme of support for smaller states. This could mirror the broad-based governance institution approach set out for Commonwealth Africa in recommendation 3 and could include a requirement to develop training, knowledge sharing and policy development strategies using online facilities similar to those referred to in recommendations 4, 5, 6 and 7.

It is suggested that these developments could be initiated within the Commonwealth Africa context, perhaps initially co-opting practitioners from other regions to some of the Africa working groups and then establishing similar mechanisms in other regions, which can be tailored to their particular needs. The intention would be to employ lightly resourced secretarial support within the regions and use the CAACC and the Commonwealth Secretariat, where appropriate, to anchor the training and development infrastructure, at least at the outset.

Additionally, and following careful preparation, the Commonwealth may seek to engineer donor-supported engagement with smaller states that are willing to explore radical programmes of reform designed to defeat corruption through holistic institutional and managerial development tailored to their particular needs. Learning from such engagements would be shared among smaller states by placements and twinning arrangements, with digital technology being used to extend the reach of the benefits gained from such initiatives. Larger states showing particular interest in such activities could be involved in offering development support.

- **Recommendation 9:** The next phase of anti-corruption programming beyond Commonwealth Africa should be centred, in the first instance, on a regionally based programme of small state support.
- **Recommendation 10:** The Secretariat should consider the possibility of offering a more radical programme of reform to smaller states that are prepared to make the necessary commitment.

Secretariat development support review

The Secretariat should prepare a strategy for the development and renewal of competences that are necessary for the contributions required of it, as outlined in the various recommendations in this report. This includes the immediate assistance that is required of the Secretariat to help develop the next phase of the Commonwealth Africa programme and the development of small states programmes.

The Secretariat should also research and develop options to meet the long-term financial requirements in support of its own anti-corruption contribution and the regional programme requirements. The latter will clearly be a matter for the regional authorities to determine but initial advice on the extent to which the Secretariat may or may not be able to offer financial support, the possibilities for development partner funding and the various options available for self-funding may be helpful. It is clear, however, that the need for a long-term financial perspective is one of the most valuable insights that can be offered to those that wish to drive this agenda forward.

- **Recommendation 11:** The Secretariat should identify the competences it requires to support Commonwealth states according to its anti-corruption strategy and programme that will be developed in response to recommendation 1 and should establish a strategy for acquiring or maintaining such competences.
- **Recommendation 12:** The Secretariat should also determine how to advise member countries on the options that are available to deal with the long-term financial consequences of decisions made to progress a broad-based anti-corruption strategy and programme in response to recommendation 1.

Funding advisory service

The Secretariat should consider establishing, in the longer term, a mentoring and advisory service to assist members in obtaining development funding for anti-corruption initiatives. Expertise in this area is limited in some countries. Small states could find this particularly beneficial.

- **Recommendation 13:** The Secretariat should consider establishing a mentoring and advisory service in the longer term to assist small states in obtaining development funding for anti-corruption activities and to assist the CAACC in developing suitable stand-alone courses in support of this objective as a short-term measure.

Towards a new Theory of Change

Given the proposals set out in this report, it is suggested that new TOCs should be developed separately for the Commonwealth anti-corruption programme and for AAACA and CAACC activities (see section 6.3 above). The development of new TOCs is seen as a fundamental part of the next stage in the development of the Commonwealth's approach to the subject of corruption.

- **Recommendation 14:** The Secretariat should develop a new TOC for its anti-corruption programme and support the development of a new TOC for the AAACA and CAACC under their revised governance arrangements.

Final remarks

The starting point of these proposals is the successful introduction of a Commonwealth Africa anti-corruption platform, which dates back to the commencement of annual conferences for heads of ACAs in 2011 and the creation of the CAACC in 2013. The proposals in this report seek to build on these achievements, although the detailed planning and implementation work is yet to be defined for the later development phases.

We consider that any strategy or programme developed in response to this evaluation should take a 10-year perspective and must be financially credible throughout that period.

Annex 1: Terms of Reference

Reference:	NJCWG0893
Post Title:	Evaluation of Anti-Corruption Africa Programme
Project Location:	Home-based with possibility of travel
Duration:	40 consultancy days
Closing Date:	24 June 2016
Eligibility:	Individuals or firms (the consultant) registered in a Commonwealth Member State

1. Introduction

The Commonwealth of Nations came into being in 1949. The Commonwealth Secretariat is an intergovernmental organisation, established in 1965. It has 53 member countries across the globe, bringing together 2.2 billion people. The Organisation promotes democracy, rule of law, human rights, good-governance, social and economic development and is also a voice for small states and youth empowerment. The Secretariat's work is guided by its Charter and Strategic Plan as stated in the Charter as "Affirming our core Commonwealth principles of consensus and common action, mutual respect, inclusiveness, transparency, accountability, legitimacy, and responsiveness".

In 2009, 'recognising that corruption in its various forms undermines good governance, public security, respect for human rights and economic development, Heads of Government urged member states which had not already done so to consider becoming parties to the UN Convention against Corruption (UNCAC)'¹. In 2013, 'Heads of Government called for concerted and accelerated efforts to eliminate all forms of corruption, both at national and international levels, including by acceding to and implementing the United Nations Convention on Corruption (UNCAC)'².

At the recently concluded 2016 Commonwealth Anti-Corruption Conference, the Secretary-General announced the proposal to develop a Commonwealth Standard. The Commonwealth Standard will tackle corruption, be an initiative to grow regional networks of national anti-corruption agencies, and support efforts to make information about companies publicly available to help expose fraud and tackle money laundering. She further noted that 'collaboration and cooperation between different nation states will be critical if we are to successfully meet the challenge bribery and corruption creates for us all'.

The Commonwealth Secretariat has established a regional community of practice – the Association of Anti-Corruption Agencies in Commonwealth Africa and Caribbean – aimed to improve the capacity of Anti-Corruption Agencies (ACA) in the Commonwealth to improve anti-corruption services. A key component of the programme is the establishment of the Commonwealth Africa Anti-Corruption Centre (CAACC) in Gaborone, Botswana which acts as an implementation agency for the Association's capacity building activities.

The Anti-Corruption Centre was set up in 2013 as a partnership among the Commonwealth Secretariat, 19 National Anti-corruption agencies among member states in Africa and the Government of the Republic of Botswana, as the host state for the Centre, to strengthen Africa Anti-Corruption Agencies of member countries to effectively deal with corruption. This is being achieved through South-South cooperation and learning to enable corruption control and attainment of development outcomes.

2. Context

Corruption in Africa has hit hard the provision of public services, being a serious threat to basic principles of democratic governance, undermining public confidence in democracy and threatening the rule of law. National Anti-Corruption Agencies in Commonwealth Africa find themselves tackling a strong enemy as new forms of corruption work develop in response to anti-corruption strategies.

1 2009 Commonwealth Heads of Government Meeting Communique, 27-29 November 2009, Trinidad and Tobago
 2 2013 Commonwealth Heads of Government Meeting Communique, 15-17 November 2013, Sri Lanka

Acknowledging that many larger and better-resourced development partners are active in this area, and building upon the lessons learnt from earlier bi-lateral and technical support, the Secretariat recognised that it could add unique value in this area by using its convening power to establish a network through which these agencies could learn from and support each other.

Accordingly, in 2011 the Secretariat brought all Heads of Anti-Corruption Agencies (ACAs) in Commonwealth Africa together to establish an Association of Anti-Corruption Agencies in Commonwealth Africa. This Community of practice seeks to promote South-South collaboration and learning by brokering the exchange of ideas and good practices within Commonwealth Africa and to encourage the sharing of experience in areas of comparative advantage.

The annual Heads of ACAs meeting acts as a focal point for the network, providing a forum through which country anti-corruption reports are peer-reviewed and transferable experiences are shared through south-south cooperation and peer learning. Meetings have so far been held in Botswana (2011), Zambia (2012), Mauritius (2013), Ghana (2014), Tanzania (2015) and Namibia (2016).

The Association has demonstrated its potential for impact, gauging from its existence for the past five years. Eight out of ten of the best performing countries in Africa on Transparency International's Corruption Perceptions Index are Commonwealth members. In the 2014 Ibrahim Index of African Governance, eight of the ten best performing countries are Commonwealth members, while no Commonwealth countries are ranked in the lowest quartile.

3. Purpose And Scope Of Assignment

The Strategic Planning and Evaluation Division (SPED) is commissioning an evaluation of the Commonwealth Anti-Corruption Africa Programme. The purpose of this evaluation is to assess the relevance, efficiency, effectiveness, sustainability and potential impact of the programme to Commonwealth Africa member states. The study will cover the five-year period from the establishment of Anti-Corruption Africa Association in 2011 to present day. The evaluation will provide an independent opinion on

the performance of the network, the institutional mechanism for delivery through the Anti-Corruption Centre in Botswana and results of the programme. It will also make recommendations from both the strategic and operational perspectives that will inform the strategic planning process. Specifically, the evaluation will:

- Assess the extent to which the Secretariat support was relevant to the priorities of member countries and consistent with the Strategic Plan;
- Assess the extent to which Commonwealth member states may have benefited from the programme and tangible outcomes realised;
- Assess the overall programme strategy and its alignment to relevant guidance provided by recognised international development organisations);
- Evaluate the efficiency and effectiveness of the Commonwealth Africa Anti-Corruption Centre as one of the core delivery components of the programme and whether this component can be replicated in other Commonwealth regions;
- Assess the level of collaboration between the Secretariat, the Government of Botswana and Anti-Corruption Agencies;
- Assess value for money;
- Assess the level of linkages that exist within the Secretariat on anti-corruption broader programming and how these can be strengthened or aligned;
- Identify issues, challenges and lessons learned and make recommendations for consideration in the next planning phase.

4. Methodology

The Consultant will include the following key steps in the conduct of the evaluation for information collection, analysis and report writing during the study.

- Review of all pertinent records and data related to the anti-corruption programme of the Secretariat;
- Interview relevant inter-Divisional Secretariat staff engaged in the delivery of the programme;

- Interview selected stakeholders- Heads and technical staff of Anti-Corruption Agencies, programme partners, collaborating institutions, and consultants among others- through field visits and electronically/ telephonically;
- Conduct field visit to the Anti-Corruption Centre in Botswana and any other relevant countries identified and agreed with SPED;
- Undertake any additional activities, as may be agreed with SPED, in order to enable the proper execution of the evaluation.

5. Deliverables

The Evaluation will provide the following deliverables to the Secretariat:

Inception Report with the Evaluation framework, work plan and methodology;

Draft Evaluation Report (following the interviews, survey and field work);

A dissemination seminar/ presentation on the Evaluation findings and recommendations;

Primary and secondary data sets used in the production of the report, especially if surveys and external data are part of the methodology;

Final Evaluation Report, incorporating all feedback/ comments received on the draft report and during the dissemination seminar.

The deliverables must be submitted to SPED electronically as a Microsoft Word document. The inception report is due within two weeks after the initial meetings with the Secretariat staff and the review of literature. The draft Evaluation report is to be submitted within two weeks of completion of the survey and field visits. Following the presentation of the Review findings at a seminar at the Secretariat and receipt of feedback comments from the Secretariat and other stakeholders on the draft report, the consultant(s) is/are expected to submit a revised final Evaluation Report. The draft (and final) Evaluation reports must be no more than 50 pages, excluding all annexes. The copyright of the Review Report shall belong to the Commonwealth Secretariat.

6. Schedule And Level Of Effort

The study is planned to commence in summer 2016. It is estimate that 40 consultant days will be needed to complete the study, including agreed

fieldwork. Travel and DSA expenses related to country field visits for validation of findings and documentation of country case studies will be covered separately as per Secretariat's Travel Policy for external consultants. The consultant(s) will work in close collaboration with SPED.

7. Location

The consultant(s) will need to travel to:

- The Commonwealth Secretariat office in London, UK for initial meetings and interviews with Secretariat staff and for presentation and discussion of the draft reports and recommendations.
- Member countries for field visits, as agreed with the Secretariat, for documentation of country case studies and validation of findings

Any other relevant work is to be undertaken at the consultant(s)' normal place of work and there is no provision for any other travel.

8. Consultancy Requirements

The consultant(s)/ consultancy team should demonstrate the following:

- Substantive knowledge and experience in undertaking reviews, evaluations and critical research;
- Knowledge and experience of anti-corruption programming, international conventions and legislations;
- Ability to handle and analyse big datasets, and to conduct multi country reviews and multi-million pound projects;
- Excellent communication skills, both spoken and written English, including experience in the production of clear and concise reports for international/inter-governmental institutions, and delivery of messages to a diversified audience;
- Good understanding of the work of multilateral organisations, especially the Commonwealth; and,
- Familiarity with Sustainable Development Goals and the international governance architecture.

Annex 2: Achievement of Project Design Document Outputs

Output 1: Agencies' corruption control capacity improved	Assessment
Activity 1.1: The Centre designs and delivers a model training course on anti-corruption investigation. The Centre will undertake training needs assessment; curriculum development; piloting and delivery of anti-corruption investigation training on priority need areas for association members (e.g. investigation skills, forensic evidence management, and asset tracing and recovery).	<ul style="list-style-type: none"> • Three phases of training course delivered • Detailed training needs assessment not completed • Substantially achieved
Activity 1.2: The Centre designs and delivers a model training course on anti-corruption prosecution. The Centre will undertake training needs assessment; curriculum development; piloting and delivery of anti-corruption prosecution training on priority need areas for association members with a prosecution mandate. Where feasible, prosecutors and investigators will be trained jointly on matters of joint concern (e.g. forensic evidence management and asset tracing and recovery), thus promoting their ability to work together effectively.	<ul style="list-style-type: none"> • Three phases of a prosecution course delivered as part of a combined investigation and prosecution course but not as a stand-alone course • Detailed training needs assessment not completed • Substantially achieved
Activity 1.3: The Centre designs and delivers a model anti-corruption training of trainers (ToT) course, which will include training in instruction and curriculum development specifically oriented towards anti-corruption subject matter.	<ul style="list-style-type: none"> • Not undertaken • Not achieved
Activity 1.4: The Centre designs and delivers anti-corruption leadership seminars. These seminars will cover strategic planning, programming and budgeting of anti-corruption programmes and will be attended by the head or deputy head of each agency.	<ul style="list-style-type: none"> • Three phases of training course delivered • Achieved
Output 2: Agencies' corruption prevention capacity improved	Assessment
Activity 2.1: The Centre facilitates in-country corruption prevention colloquia with media. The Centre will provide an expert facilitator to each association member country for one in-country corruption prevention colloquium with the media, commencing with a pilot colloquium in Gaborone.	<ul style="list-style-type: none"> • Botswana colloquia with media held • No facilitators provided for media colloquia outside Botswana • Minimal achievement, although it may now be combined with activity 2.2
Activity 2.2: The Centre facilitates in-country corruption prevention colloquia with civil society and business. The Centre will provide an expert facilitator to each association member country for one in-country corruption prevention colloquium with civil society organisations and business, commencing with a pilot colloquium in Gaborone.	<ul style="list-style-type: none"> • Botswana colloquia held • No colloquia held outside Botswana to date although the intention is to remedy this • Limited achievement, but this process is beginning to take shape

Output 3: Agencies' regional cooperation strengthened	Assessment
<p>Activity 3.1: The Centre facilitates exchange of expertise among agencies. It will broker and facilitate (including financially, where there is a demonstrated need, e.g. in poorer Commonwealth African countries) institutional twinning and exchange programmes between agencies and other technical support (e.g. advice provided over Commonwealth Connect).</p>	<ul style="list-style-type: none"> • Little evidence of CAACC facilitation of twinning arrangements. • The 2016 AAACA Conference devoted considerable time to reports of country study visits that had taken place in the previous year and working groups met during the conference to discuss possible anti-corruption developments • The AAACA has taken steps to sponsor the strengthening of regional cooperation
<p>Activity 3.2: The Centre facilitates peer reviews of agencies. It will organise and facilitate peer reviews of aspects of agencies' work by small teams of highly qualified experts from other agencies.</p>	<ul style="list-style-type: none"> • Some peer reviews undertaken but these were most likely initiated by the agencies themselves • No methodology or results published • Limited achievement
<p>Activity 3.3: The Centre organises the annual review meeting. It will organise, in collaboration with the host country (Mauritius in 2013) an annual review meeting at which the Centre and the agencies will report on progress against log-frame indicators. The agencies will be expected to continue to fund the participation of their representatives.</p>	<ul style="list-style-type: none"> • Annual review meetings successfully held • No reporting on progress against log-frame indicators at annual review meetings • Partly achieved
Output 4: Agencies' knowledge services and monitoring and evaluation improved	Assessment
<p>Activity 4.1: The Centre trains and mentors agencies to run a monitoring and evaluation system. The Centre will undertake training needs assessments, curriculum development, piloting and delivery of corruption prevention training for agency members (e.g. governance and internal controls of public authorities, public sector codes of conduct and procurement).</p>	<ul style="list-style-type: none"> • Three monitoring and evaluation training courses conducted • Three corruption prevention training courses conducted • Partly achieved
<p>Activity 4.2: The Centre commissions research papers on corruption. The Centre will commission research and policy papers that, in addition to their value to the agencies, will provide highly relevant information to Commonwealth governments, universities, research institutions and the wider donor community.</p>	<ul style="list-style-type: none"> • Research undertaken in five countries • No research published on website • Partly achieved
<p>Activity 4.3: The Centre facilitates and advises on agencies' collection, collation, analysis and dissemination of baseline and annual project monitoring and evaluation data. The Centre will support agencies in collecting and exploiting rudimentary baseline data as agreed in the log-frame (as amended during inception) and for subsequent annual reviews. This will include the conducting of public perception or internal Agency surveys and the recording of internal statistics that are relevant to the agreed indicators.</p>	<ul style="list-style-type: none"> • Little evidence of provision of assistance (excluding training courses) to agencies in collecting and exploiting rudimentary baseline data, including surveys and internal statistics that are relevant to agreed indicators • Minimal achievement

<p>Activity 4.4: The Centre will undertake communications activities, including the production of newsletters or other publications, the annual presentation of an innovation award for anti-corruption and providing solidarity among association members in support of individual members facing hostile political and media campaigns.</p>	<ul style="list-style-type: none"> • Publication of newsletter commenced • Innovation award not established • Action to support individual members facing hostile political and media campaigns not evident • Partly achieved
<p>Output 5: Possible third and fourth year project activities</p>	<p>Assessment</p>
<p>Establish a regional anti-corruption offender database</p>	<p>No progress; not achieved</p>
<p>Establish a regional corruption complaints' 'hotline'</p>	<p>No progress; not achieved</p>

Annex 3: List of Documents Reviewed

Commonwealth Secretariat Resource Materials

1. Government of Botswana, *Agreement on the Arrangement to Operationalise the Association of Anti-Corruption Agencies in Commonwealth Africa*, Directorate on Corruption and Economic Crime Botswana, May 2013
2. Anti-Corruption Expert Commonwealth Fund for Technical Cooperation Technical Assistance Unit: Six Monthly Report – July 2016
3. Biennial Report of the Commonwealth
4. *Common Law Legal Systems Model Legislative Provisions on Money Laundering, Terrorism Financing, Preventative Measures and Proceeds of Crime*, 2016
5. Commonwealth (Latimer House) Principles on the Three Branches of Government
6. Commonwealth Africa Anti-Corruption Centre (CAACC) Advisory Board ToR (undated)
7. Commonwealth Africa Anti-Corruption Centre (CAACC) Minutes of the third Advisory Board meeting held on 1 June 2016 in Namibia
8. *Commonwealth Africa Anti-Corruption Centre (CAACC) Project Design Document*, February 2013
9. Commonwealth Anti-Corruption Round Table, held at Marlborough House, 18 March 2015
10. Commonwealth Secretariat Annual Results Report 2014/15
11. Commonwealth Secretariat Revised Strategic Plan 2013/14–2016/17
12. Integrity in Public Life: A Commonwealth Model Act
13. Ken Brander, *Commonwealth Africa Anti-Corruption Agencies Policy and Procedure Benchmarking and Gap Analysis Project: Commonwealth and UNODC*, 2016

14. Key Principles of Public Sector Reforms: Case Studies and Frameworks
15. Report on Anti-Corruption Research Activities. Public Sector Governance Unit, Commonwealth Secretariat (undated)
16. Secretariat Staff, *Back-to-office reports (BTORs)* for all association conferences – 2011 – 2016
17. Six Monthly Progress Results Report January–June 2016
18. Six Monthly Progress Results Report July–December 2015
19. Training Plan for June 2015 to June 2017

Member Country Resource Materials

1. *BTI 2016 Rwanda Country Report* – part of the Bertelsmann Stiftung's Transformation Index (BTI), 2016
2. Clement Musangabatware (Deputy Ombudsman in charge of preventing and fighting corruption and related offences), *Legal framework and strategies to prevent and fight against corruption in Rwanda* (PowerPoint presentation)
3. Clement Musangabatware, *The Anti-Corruption Campaign in Rwanda, Myth or Reality: Why the Academia Must Get Involved?* Rwanda (PowerPoint presentation)
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7. European Union, *Action Document for the Ghana Anti-Corruption Rule of Law and Accountability Programme*, Ghana, 2015
8. European Union, *Background paper on Rwanda 2014 – prepared under the 'Anti-Corruption Policies Revisited'*, European Union project, 2014
9. European Union, *Republic of Rwanda National Indicative Programme for the period 2014–2020*, 2014
10. Government of Botswana, *Annual Report*, Directorate of Corruption and Economic Crime (DCEC), Botswana, 2015
11. Government of Botswana, *Corruption Prevention Booklet*, Directorate of Corruption and Economic Crime (DCEC), Botswana
12. Government of Botswana, *Standing Procedures*, Directorate of Corruption and Economic Crime (DCEC), Botswana, 2004
13. Government of Botswana, *Youth Booklet*, Directorate of Corruption and Economic Crime (DCEC), Botswana, 2006
14. Government of Rwanda, *Annual report of the Office of the Ombudsman July 2013–June 2014*, Rwanda, 2014
15. Government of Rwanda, *Second master draft, public expenditure and financial accountability (PEFA) assessment 2015*, Central Government, Rwanda, 2016
16. Government of Rwanda, *Strategic plan of Office of the Ombudsman from 2014/2015 to 2018/2019*, Rwanda, 2015
17. Hanna, R et al., *The Effectiveness of Anti-Corruption Policy: What Has Worked, What Has Not, and What We Do Not Know – a Systematic Review*, Technical report, London, EPPI-Centre, Social Science Research Unit, Institute of Education, University of London (2011)
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19. Office of Chief Internal Auditor (Rwanda), *2013–2018 strategic plan*, 2013
20. Office of the Auditor General of State Finances (Rwanda), *Report of the Auditor General of State Finances for the year ended 30 June 2015*, 2015
21. Republic of Tanzania, *Anti-Corruption Strategy for Public Procurement in Tanzania*, 2009
22. Republic of Tanzania, *The Prevention and Combatting of Corruption Act*, Tanzania, 2007
23. Rwanda Government, Office of the Ombudsman, *Rwanda Anti-Corruption Policy*, 2012
24. Rwanda Government, *The Republic of Rwanda, Justice, Reconciliation, Law and Order Sector Strategic Plan July 2013 to June 2018*, 2013
25. Rwanda Public Procurement Authority, *Annual activity report for the fiscal year 2014–15*, 2015
26. The Judiciary of Rwanda *Strategic Plan 2013–2018*, 2013
27. The Public Leadership Code of Ethics Act (Tanzania), 1995
28. Transparency International Rwanda, *Rwanda bribery index 2015 (infographic)*, 2015
29. Transparency International, *Rwanda Bribery Survey 2015 (summary)*, 2015
30. World Bank, *Fiscal Year 2014–2018 Country Partnership Strategy for Rwanda*, Executive Summary (Volume 1) and Annexes (Volume 2), 2014
31. World Bank, *Program Appraisal Document on a Proposed Credit for the amount SDR 65.9 million (US\$100 million equivalent) to the Republic of Rwanda for a Public Sector Governance Program-for-Results*, 2014

Other Anti-Corruption Resource Materials

1. AfroMAP, *Effectiveness of Anti-Corruption Agencies in East Africa: A Review*, 2015
2. Alice Lam, *Tacit Knowledge, Organisational Learning and Social Institutions: An Integrated Framework*, European Group for Operational Studies, 2000

3. Commonwealth Secretariat, *Collectively Combating Corruption in Africa: A survey of anti-corruption agencies in Africa. The case of Rwanda*, 2016
4. Daniel Kaufmann, Myths and Realities of Governance and Corruption; World Bank http://siteresources.worldbank.org/INTWBIGOVANTCOR/Resources/2-1_Governance_and_Corruption_Kaufmann.pdf
5. Emanuel M. Letete, *Collectively Combatting Corruption in Africa (Lesotho case study)*, 2016
6. ERBD, *Evaluation Performance Rating – Note 6*, 2015
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8. Frederico Links, *Namibia: An 'Island of Success' in Combatting Corruption on the African Continent*, 2016
9. Gape Kaboyakgosi, *Collectively Combatting Corruption in Africa (Botswana case study)*, 2016
10. Gupta, Davoodi and Alanso-Terme, *Does Corruption Affect Income Inequality and Poverty?*, IMF, 1998
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12. Harvard Family Research Project, *An Introduction to Theory of Change*, Harvard Graduate School of Education, 2005
13. How to Monitor and Evaluate Anti-Corruption, U4 Report No. 8, 2011
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15. Khan and Grey, *State Weakness in Developing Countries and Strategies of institutional Reform: Operational Implications for Anti-Corruption Policy and a Case Study of Tanzania.*, DFID, 2015
16. Kirkpatrick, D. *Techniques for Evaluating Training Programs*. Training and Development Journal, 1979
17. Mark Granovetter, *The Strength of Weak Ties*. American Journal of Sociology, 1973
18. Mo Ibrahim Foundation, *A decade of Africa Governance 2006–2015*, Ibrahim Index of African Governance, 2016
19. Mukesh Arya, *Research on Success in Combating Corruption (Seychelles)*, 2016
20. Mushtaq H. Khan, *Aid and Governance in Vulnerable States: Bangladesh and Pakistan since 1971. The Annals of the American Academy of Political and Social Science*, Volume 656 No. 1: 59–78, 2014
21. NORAD, *Joint Evaluation of Support to Anti-Corruption Efforts, 2002–2009 Report*, No. 6/2011.
22. Official list of SDG Indicators – UN General Assembly Resolution 68/261
23. Pavani Ranzachari, *Knowledge Sharing Networks in Professional Complex Systems*, Journal of Knowledge Management, 2009
24. Reports of the Annual Meetings and Conferences of the Heads of Anti-Corruption Agencies, 2011, 2012, 2013, 2014, 2015 and 2016
25. Trace International, *Trace Matrix Country Risk Scores Table, 2014 Results*
26. Transparency International and AfroBarometer, *People and Corruption African Survey. Global Corruption Barometer*, (2015)
27. UN Conference of the States Parties to the UNCAC, 30 May 2016
28. UN Convention against Corruption, 2004
29. UNDP, *Capacity Assessment of Anti-Corruption Agencies: a Practitioners Guide*, 2011
30. UNDP, *Evaluation of Contribution to Anti-Corruption and Governance Integrity in a Development Context – Concept note*, 2015
31. UNDP, *Handbook on Planning Monitoring and Evaluation for Development Results*, 2009
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34. United Nations. Economic Commission for Africa, African Governance Report IV 2016: Measuring Corruption in Africa: The International Dimension Matters. <http://repository.uneca.org/handle/10855/23012>
35. Vogel, *Review of the Use of 'Theory of Change' in International Development*, DFID, 2002
36. World Economic Forum, *The Global Competitiveness Report 2016–2017*, 2016

Annex 4: List of People Interviewed

Commonwealth Secretariat

No	Name	Position and Division/Unit
1.	Amy Ingham	Planning and Monitoring Officer; Strategic Planning and Evaluation Division
2.	Augustus Cole	Public Financial Management Adviser; Public Sector Governance Unit
3.	Deodat Maharaj	Deputy Secretary General; Office of the Secretary General
4.	Jacqueline Johnson	Programme Officer; Public Sector Governance Unit
5.	Joan Nwasike	Head of Public Sector Governance Unit
6.	Katherine Marshall-Kissoon	Results Based Management Officer; Strategic Planning and Evaluation Division
7.	Kemi Ogunsanya	Gender Adviser, Office of the Secretary General
8.	Layne Robinson	Head of Youth Programme Section; Youth Division
9.	Mark Guthrie	Legal Adviser; Rule of Law Division
10.	Martin Kasirye	Adviser and Head (Electoral Section) and colleagues; Political Affairs Division
11.	Nabeel Goheer	Director; Strategic Planning and Evaluation Division
12.	Oluwatoyin Job	Technical Adviser - West Africa; Technical Assistance Unit
13.	Paul West	Education Adviser; Health and Education Unit
14.	Roger Koranteng	Interim Adviser and Head; (Anti-Corruption Adviser); Public Sector Governance
15.	Shadrach Haruna	Legal Adviser; Rule of Law Division
16.	Yvonne Apea Mensah	Head of Africa Section (and colleagues); Political Affairs Division

Commonwealth Africa Anti-Corruption Centre – Botswana

No.	Name	Position
1.	Lerato Dube	Communications and Political Affairs Coordinator
2.	Mapho Ketlhaotsewe	Finance and Administration Officer
3.	Frank Montil	Technical Expert
4.	Annah Ramatsiri	Training and Development Coordinator
5.	Mogolodi Rantsetse	Manager
6.	Sethunya Rathedi	Research Coordinator

Member countries

No.	Name	Position
Botswana		
1.	Augustine Makgonatsotlhe	Ombudsman
2.	Bridget John	Chair, Public Procurement and Asset Disposal Board
3.	Pauline Letebele	Auditor General
4.	Pusetso Morapendi	Chair, and Bonang Modise, member, Botswana Civil Society Action Against Corruption Network
5.	Rose Seretse	Director, Department of Corruption and Economic Crime
6.	Tebelelo Pule	Acting Chief Executive Officer and Director of Corporate Services, Competition Authority
7.	Veronica Kubomo	Head of Internal Audit
Ghana		
8.	Charles Ayamdoo,	Director of Anti-Corruption, Commission on Human Rights and Administration of Justice
9.	Linda Ofori-Kwafo	Executive Secretary of the Ghana Integrity Initiative (recently Executive Secretary of the Ghana Anti-Corruption Coalition (GACC))
Lesotho		
10	Borotho James Matsoso	Director, Directorate on Corruption and Economic Offences
Rwanda		
11.	Alexis Kamuhire	Chief Internal Auditor
12.	Aloysie Cyzanzayire	Ombudsman
13.	Apollinaire Mupiganyi	Executive Director, Transparency International
14.	Augustus Seminega	Director General, Rwanda Public Procurement Authority
15.	Bisaro R. Obadiah	Auditor General
16.	Ezra Gasangwa	Legal Adviser, Office of the Auditor General
17.	Jacques Birasa Fiscal	Director of Special Investigation on Corruption Unit, Office of the Ombudsman
18.	Jean Aime Kajangana	Director of Monitoring Interdictions and Incompatibilities of Senior Officials Unit, Office of the Ombudsman
19.	Jeanne d'Arc Mwiseneza	Director of Declaration of Assets Unit, Office of the Ombudsman
20.	Kabega Caritas	Investigator in Declaration of Assets Unit, Office of the Ombudsman
21.	Mahame Emmanuel Itamwa	Inspector of Courts and Spokesperson of the Judiciary
22.	Ngirinshuti Vedaste	System Review Officer, Office of the Ombudsman
23.	Nzeyimana Nadège	Public Relations and Communication Officer, Office of the Ombudsman
24.	Veranda Mukakimenyi	Internal Auditor in charge of Central Government
25.	Xavier Mbarubukeye	Permanent Secretary, Office of the Ombudsman
Seychelles		
26.	Lucy Athanasius	Chief Executive Officer, Seychelles Anti-Corruption Commission
South Africa		

No.	Name	Position
27.	Advocate J. L. Mothibi	Head of Unit, Special Investigations Unit
28.	Enoch Qoma	Learning and Development Manager, Special Investigations Unit
29.	Leonard Lekgetho	Projects Director – Investigations, Special Investigations Unit
Tanzania		
30.	Action Director of Compliance	Public Procurement Regulatory Authority
31.	Benas Mayogu	Procurement Specialist, PFM Reform Programme
32.	Kulthum Ahmed Mansoor	Director for Planning, Monitoring and Evaluation, The Prevention and Combatting of Corruption Bureau, and colleagues
33.	Professor Mussa Juma Assad	Auditor General
34.	Salome Kaganda	Ethics Commissioner, and colleagues
35.	Sebastian Ndandala	Programme Co-ordinator, PFM Reform Programme

Development organisations

No	Name and Position	Organisation
1.	Phill Jones, Financial Liaison Officer	British High Commission, Dar es Salaam
2.	Phil Mason, Senior Anti-Corruption Adviser	Department for International Development (DFID), UK
3.	Sam Waldock, Governance Adviser	Department for International Development (DFD), Kigali
4.	Bhaswar Mukhopadhyay, Resident Representative	International Monetary Fund (IMF), Tanzania
5.	Enagnon Ernest Eric Adda, Senior Financial Management Specialist	World Bank, Kigali

Annex 5: Commonwealth Africa Anti-Corruption Centre Course Participant Survey Report

1. Introduction

In 2016, PFMConnect Ltd was appointed to undertake an evaluation of the Commonwealth Africa Anti-Corruption Programme (CACAP). The full evaluation report is to be published by the Commonwealth Secretariat in early 2017. As part of that evaluation, PFMConnect Ltd conducted an online survey of employees of Commonwealth Africa anti-corruption agencies who have attended courses provided by the Commonwealth Africa Anti-Corruption Centre in Botswana (CAACC). This survey was undertaken to assess the likely benefits arising from participation in the CAACC courses and to seek participants' views regarding the content of future courses offered by the CAACC. The survey findings are summarised in the full evaluation report. This report contains a comprehensive analysis of the survey results.

The survey methodology drew on a study undertaken to assess social learning undertaken during 2010–14 by two African public sector groups, the Southern African Development Committee Organisation of Public Accounts Committees (SADCOPAC) and the Eastern Africa Association of Public Accounts Committees (EAAPAC).

The survey included questions that sought to address:

- the immediate value gained by participants;
- the potential value identified by participants;
- the manner in which participants have changed their work approach as a result of their participation;
- the significant changes, if any, that have arisen in their workplace following their participation.

The survey questionnaire is presented in the Annex 6 below.

2. Approach

Email addresses of course participants were obtained primarily from course evaluation reports supplied by the CAACC. Participants were contacted in three stages: on 4 October, 8 October and 6 November. Where the email addresses of participants were omitted from CAACC course evaluation reports, the chief executives of Anti-Corruption Agencies (ACAs) were contacted to encourage these participants to complete the survey. This approach was partly successful. Emails were successfully sent to a total of 107 participants during October and November 2016. As of 20 December, completed responses had been received from 59 course participants, while a further six participants had submitted partly completed responses. A further 25 responses resulted from an appeal to anti-corruption agency chief executives to encourage responses from other course participants who were less directly accessible. Of the respondents, 36 per cent were female and 64 per cent male. This reflects the gender split of the initial cohort. Charts presented in this report are based on the responses for each particular question.

3. Overview of results

3.1 Respondents' personal data

Respondents' current roles in ACAs and the names of the organisations where they are currently employed were sought in questions 1 and 2. The names of the countries where respondents are currently working were sought in question 3. This data is presented in Figure 1.

Participants' gender details were sought in question 4. This data is presented in Figure 2.

Female and male respondents represented 35.94 per cent and 64.06 per cent, respectively, of all respondents. Respondents' current length of employment in anti-corruption activities was

Figure 1 Online survey respondents, by country

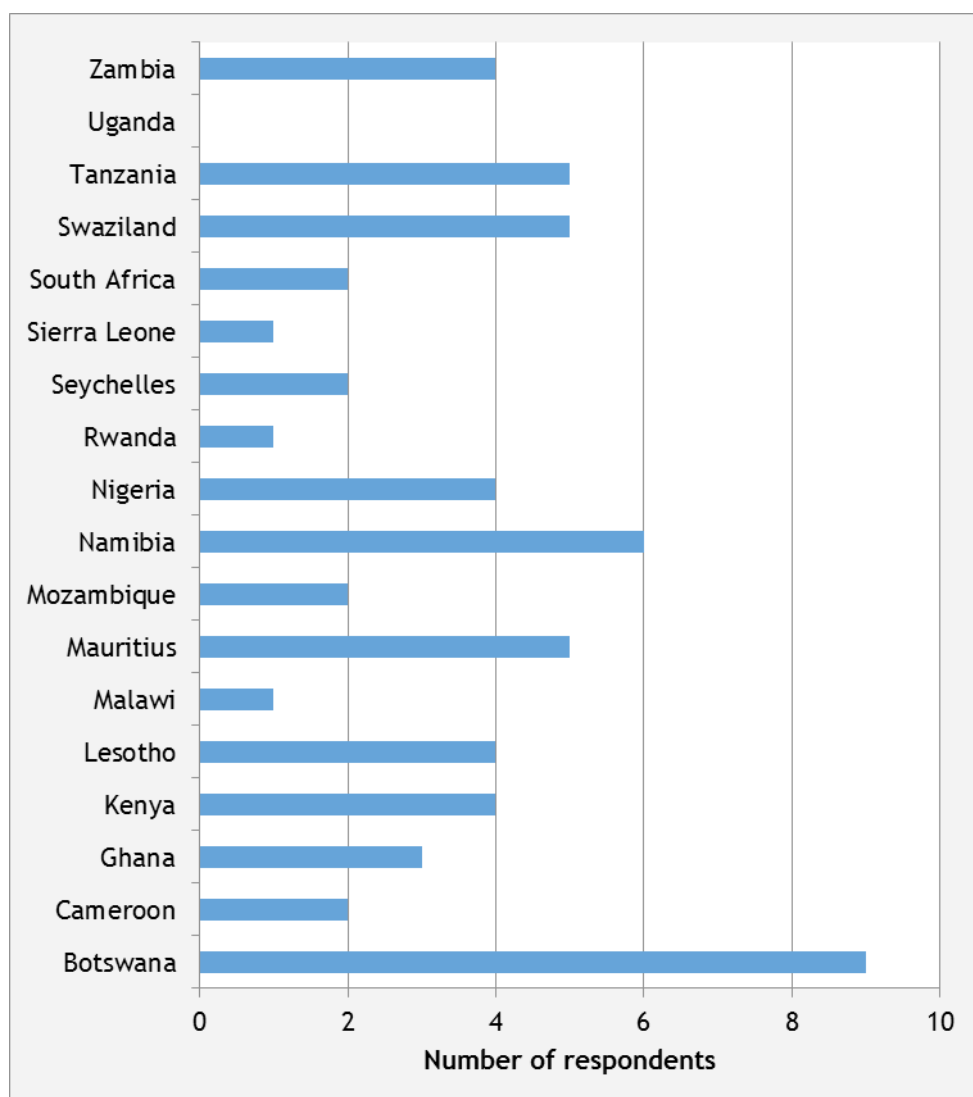


Figure 2 Online survey respondents, by gender

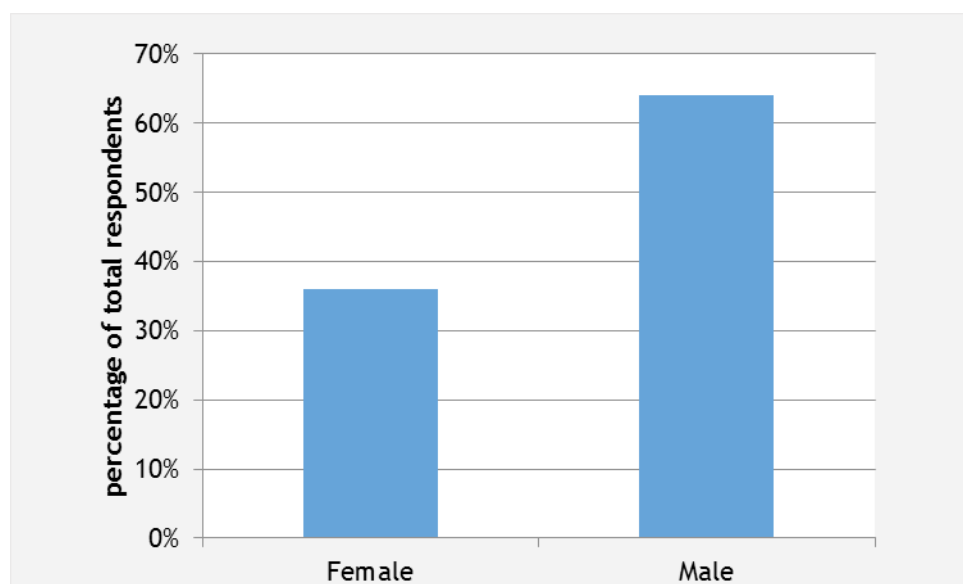
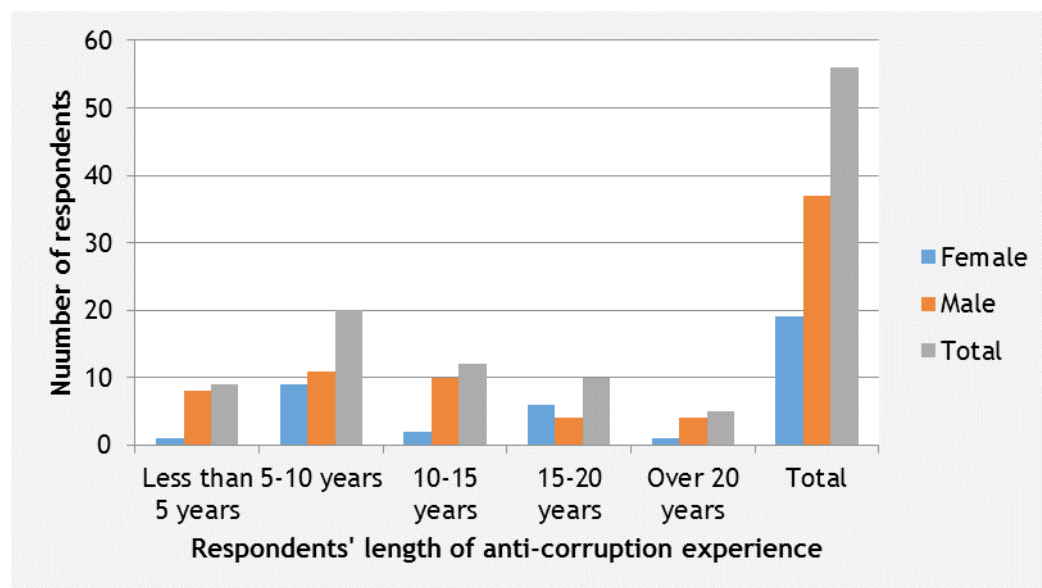


Figure 3 Online survey respondents, by length of anti-corruption employment experience and gender



sought in question 5, across five experience categories. The distribution of experience and gender data across the five employment length categories is presented in Figure 3.

Male respondent numbers exceeded female respondent numbers in all anti-corruption experience categories, except for the 15–20 years category.

3.2 Training received

Details of the training received by respondents were sought in question 6. Data showing the distribution of courses attended by respondents and the distribution of courses of employment length data across five course categories is presented in Figure 4.

The largest number of respondents was recorded for the monitoring and evaluation category. The highest number of respondents was in the 5–10

Figure 4 Online survey respondents, by course category and length of anti-corruption employment experience

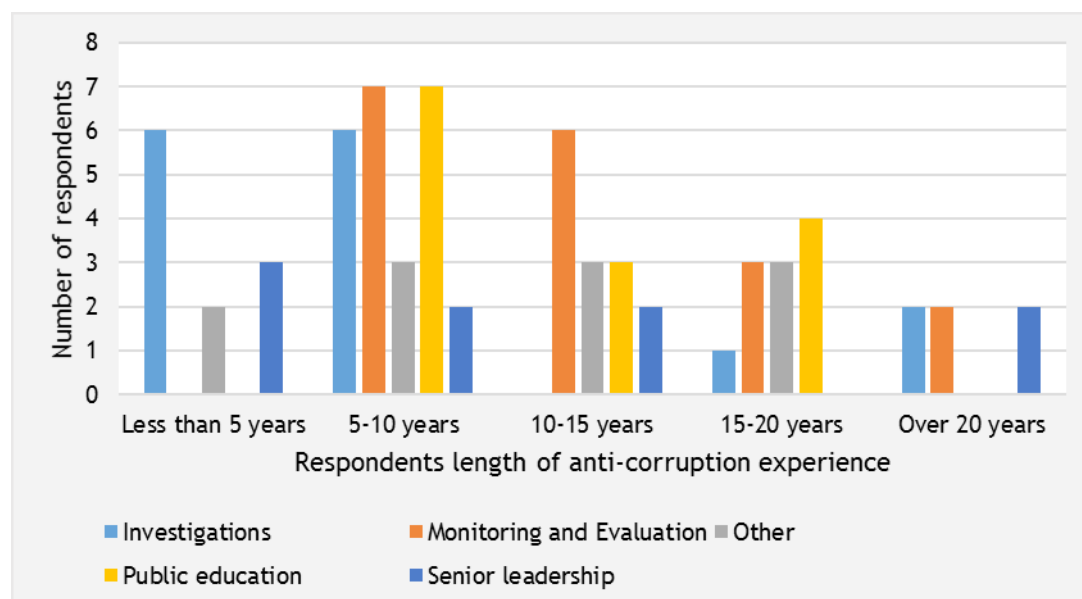
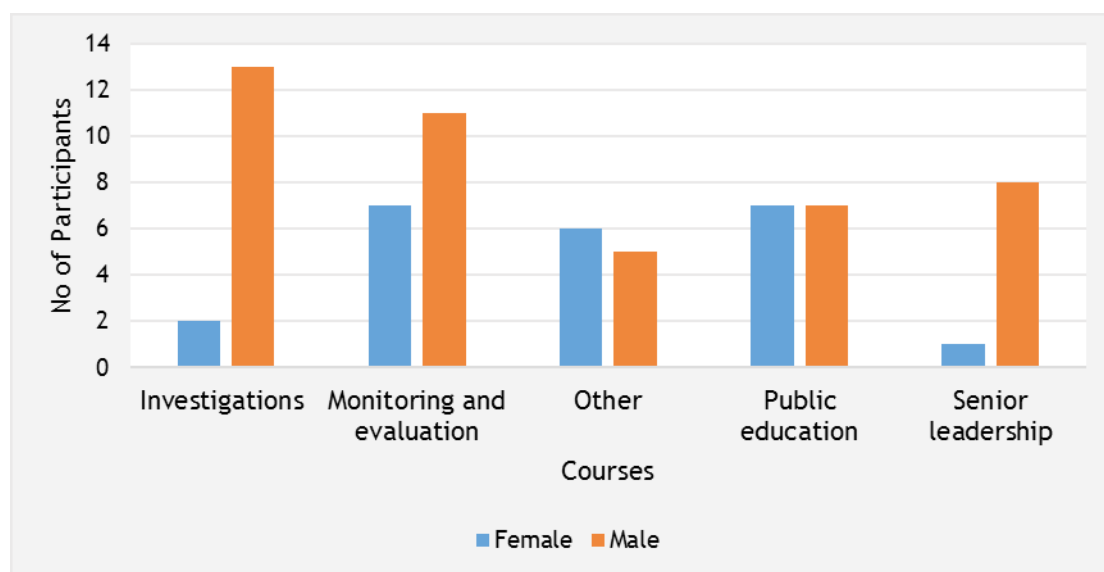


Figure 5 Online survey respondents, by course category and gender



year category. The distribution of respondents by gender across the five course categories analysed is presented in Figure 5.

The number of male respondents exceeded the number of female respondents in three of the five course categories. It is notable that female representation was particularly low in 'investigations' and 'senior leadership'.

Further information from respondents reporting 'other training' was sought in question 7, which was open-ended. Of the 17 respondents, the

majority attended leadership and management (5) and professional ethics and integrity courses (5). The extent to which respondents completed all phases of their training courses was probed in question 8. Seventy-two per cent of respondents said they had completed all course phases, while 28 per cent said they had not completed their entire courses. Explanations of why training courses were not completed were sought in question 9, which was an open-ended question. These included the Ebola virus (1), funding (2), inability

Figure 6 Online survey respondents' assessment of course value, by gender

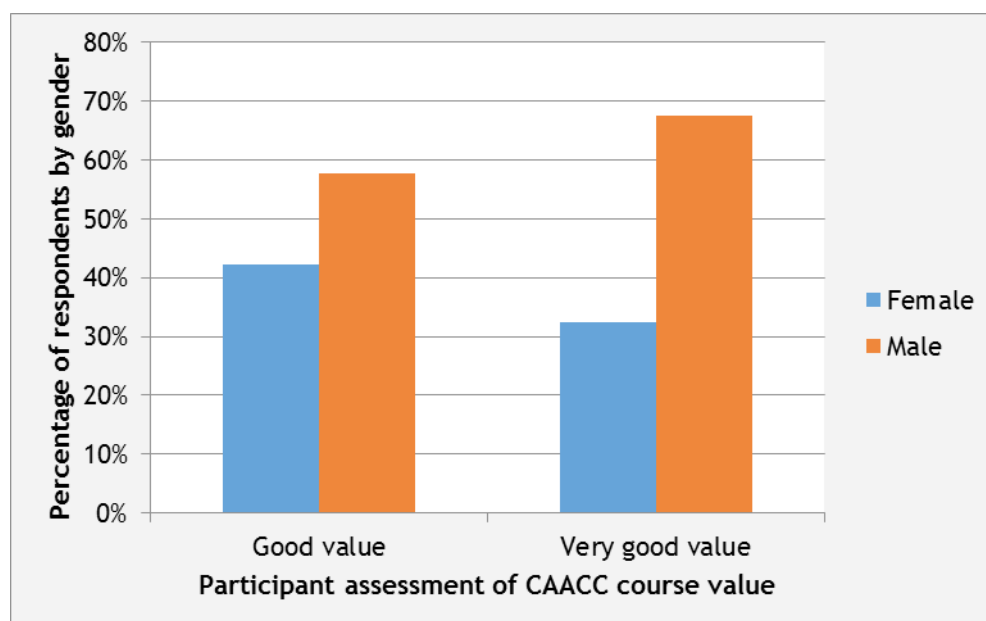
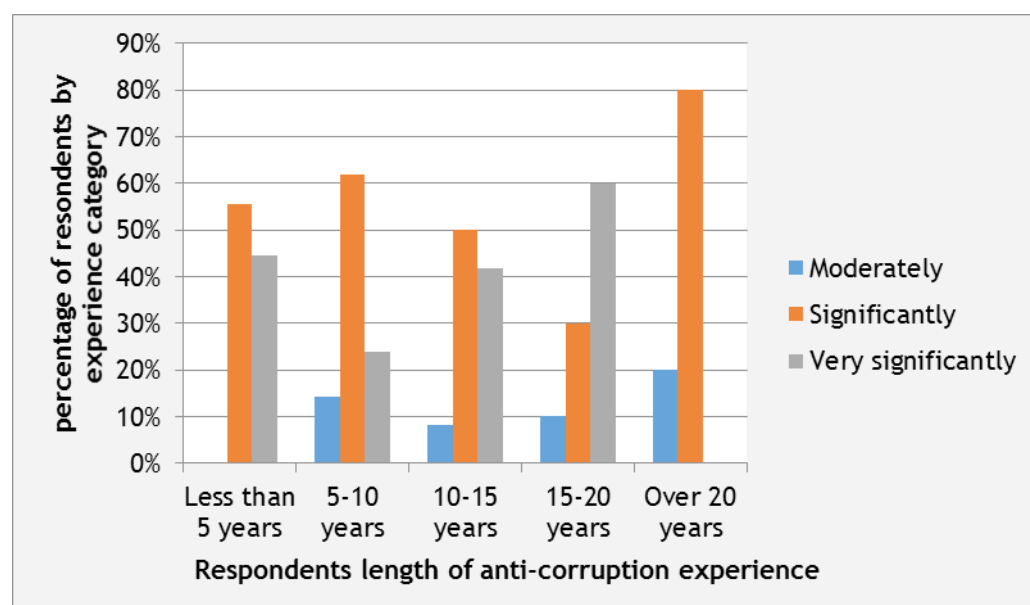


Figure 7 Online survey respondents' assessment of expansion of knowledge, by length of anti-corruption employment experience



to get internal approval to participate (4), CAACC programme changes (2), visa difficulties (2) and work commitments (5).

3.3 Personal benefits

The immediate value gained by course respondents

Three questions addressed the subject of the immediate value gained by course respondents. Respondents were asked in question 10 to assess

the value of the training courses that they attended. The responses, reported across two value categories by gender, are presented in Figure 6.

More than half of female and male respondents thought that the CAACC courses were 'very good value', while at least 40 per cent of female and male respondents thought that the CAACC courses were 'good value'. Respondents were then asked in question 11 to assess the extent to which the training courses that they attended had expanded their current knowledge of the relevant topics.

Figure 8 Online survey respondents' assessment of expansion of knowledge, by gender

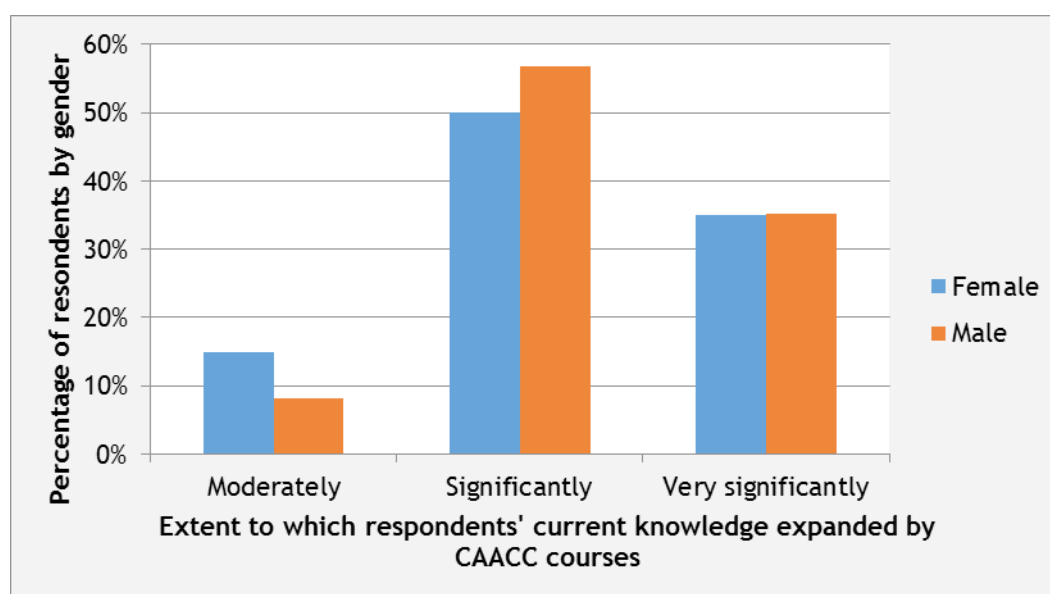
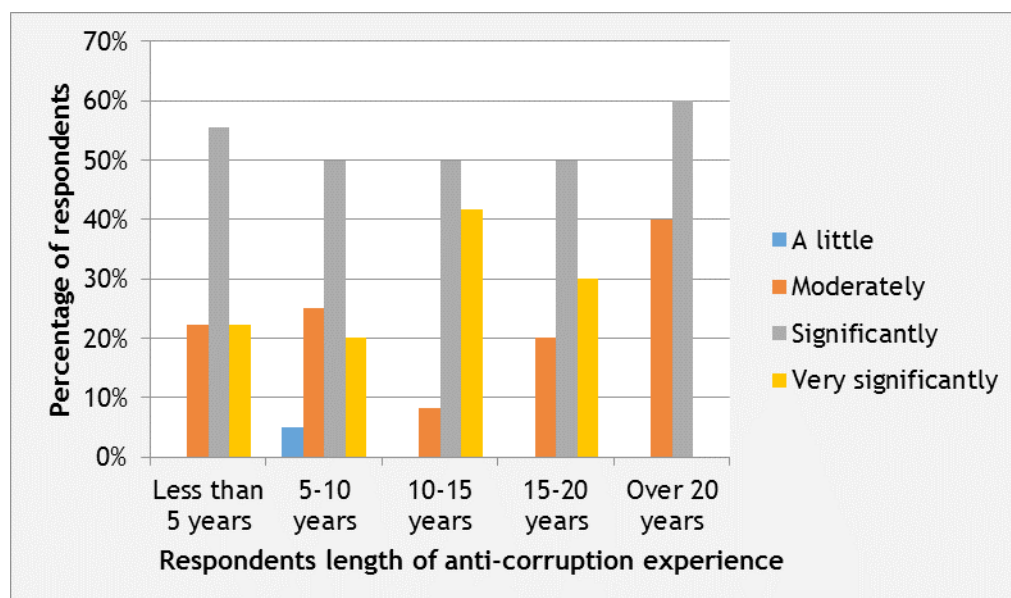


Figure 9 Online survey respondents' assessment of improvement in ability to perform current roles, by years of anti-corruption employment experience



The responses, reported across three categories of significance by length of anti-corruption employment experience, are presented in Figure 7.

At least 80 per cent of all respondents in each anti-corruption employment experience category considered that CAACC courses had at least significantly expanded their knowledge. The responses in respect of the extent to which the training courses had expanded respondents' current knowledge by gender are presented in Figure 8.

At least 80 per cent of all female and male respondents considered that CAACC courses had at least significantly expanded their knowledge. Respondents were asked in question 12 to assess the extent to which the training courses that they attended had increased their ability to perform their current anti-corruption roles. The responses, reported across five categories of years of anti-corruption experience, are presented in Figure 9.

Figure 10 Online survey respondents' assessment of improvement in ability to perform current roles, by years of anti-corruption employment experience

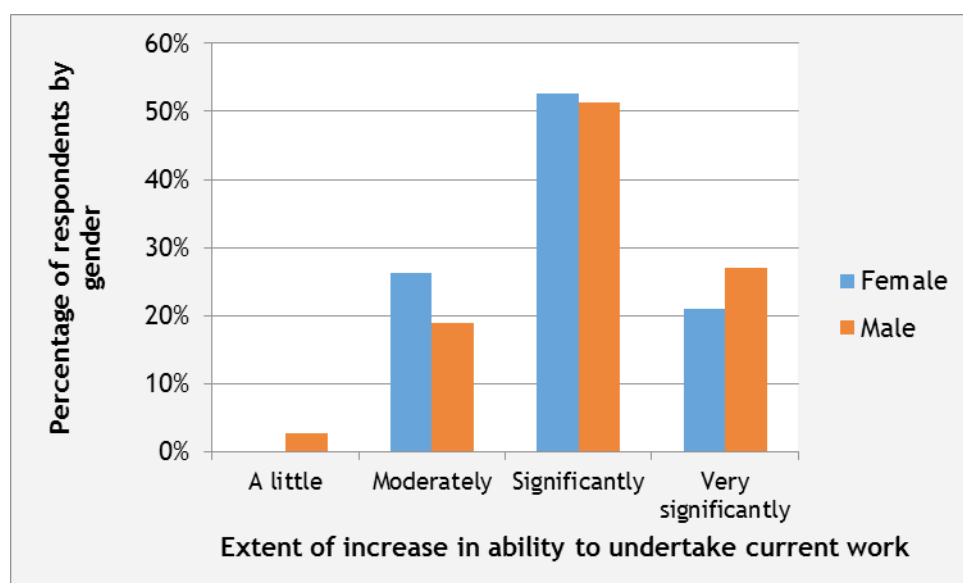
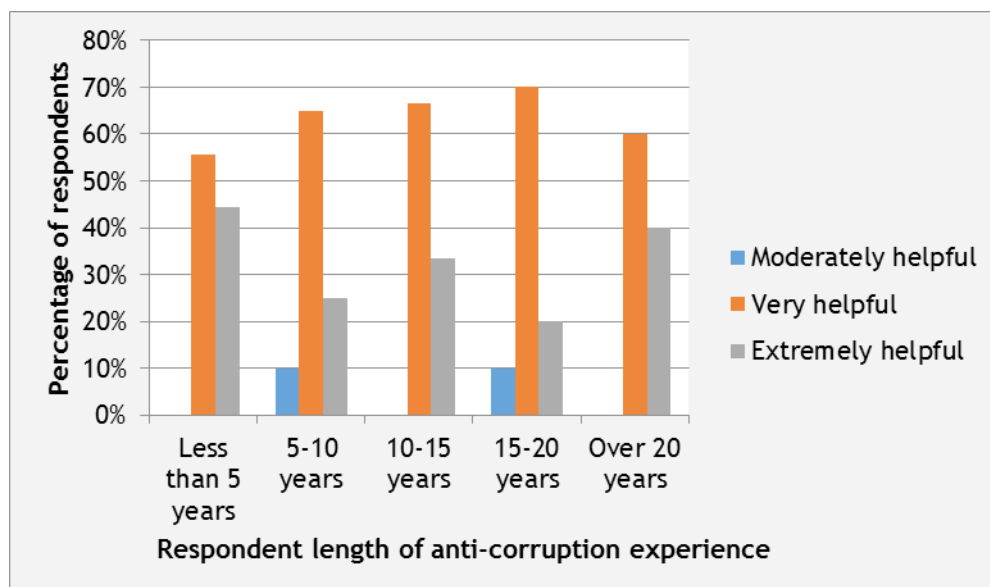


Figure 11 Online survey respondents' assessment of future assistance derived from CAACC courses, by anti-corruption employment experience category



In four of the five experience categories, at least 70 per cent of respondents reported a significant improvement in their ability to perform their current roles. It is to be noted that none of the attendees with more than 20 years' experience considered that the courses had increased their experience 'very significantly' and it is worth considering that this may indicate that there should be a more appropriate content for the more experienced staff.

The full evaluation report argues for more specialised and topical course content and this may lead to a higher satisfaction rate for these

staff. Nevertheless, a 60 per cent 'significant improvement' response and 40 per cent 'moderate improvement' response should be regarded as a useful achievement for those with more than 20 years' experience. The responses assessing the extent to which the training courses had increased respondents' ability to perform their current anti-corruption roles in their work by gender are presented in Figure 10.

At least 70 per cent of female and male respondents reported a significant improvement in their ability to perform their current roles.

Figure 12 Online survey respondents' assessment of future assistance derived from CAACC courses, by gender

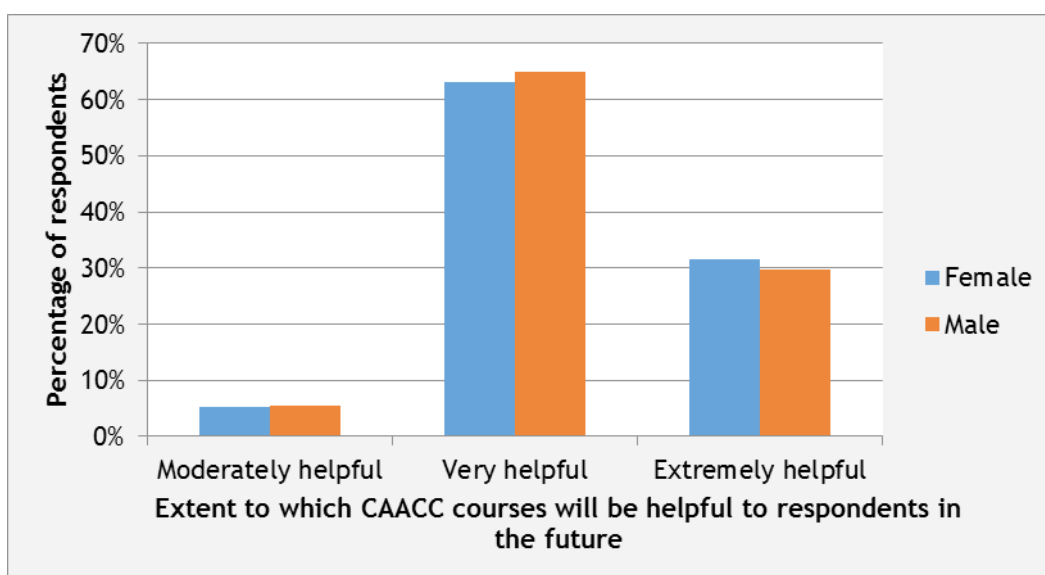
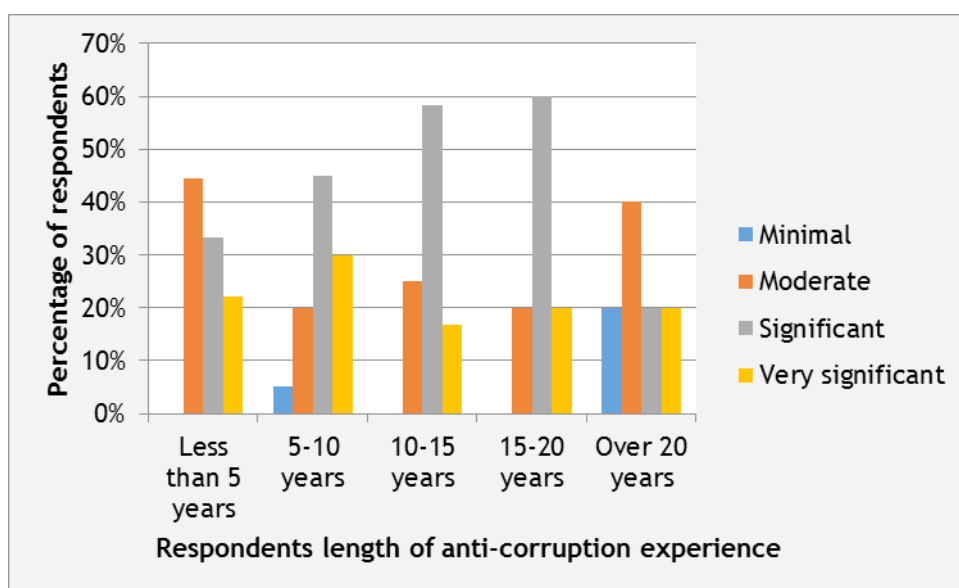


Figure 13 Extent of changes made in online survey respondents' work following return to office from CAACC courses, by anti-corruption employment experience



The potential value accruing to course respondents

Respondents were asked in question 13 to assess the extent to which they considered that training courses that they attended would be helpful to them in the future. The responses, reported across the five experience categories, are presented in Figure 11.

At least 90 per cent of respondents across the five experience categories indicated that the training courses that they attended would be, at a minimum, very helpful to them in the future. Responses assessing the extent to which respondents considered the training courses would be helpful to them in the future by gender are presented in Figure 12.

At least 90 per cent of all respondents indicated that the training courses that they attended would be, at a minimum, very helpful to them in the future.

Figure 14 Extent of changes made in online survey respondents' work following their return to office from CAACC courses

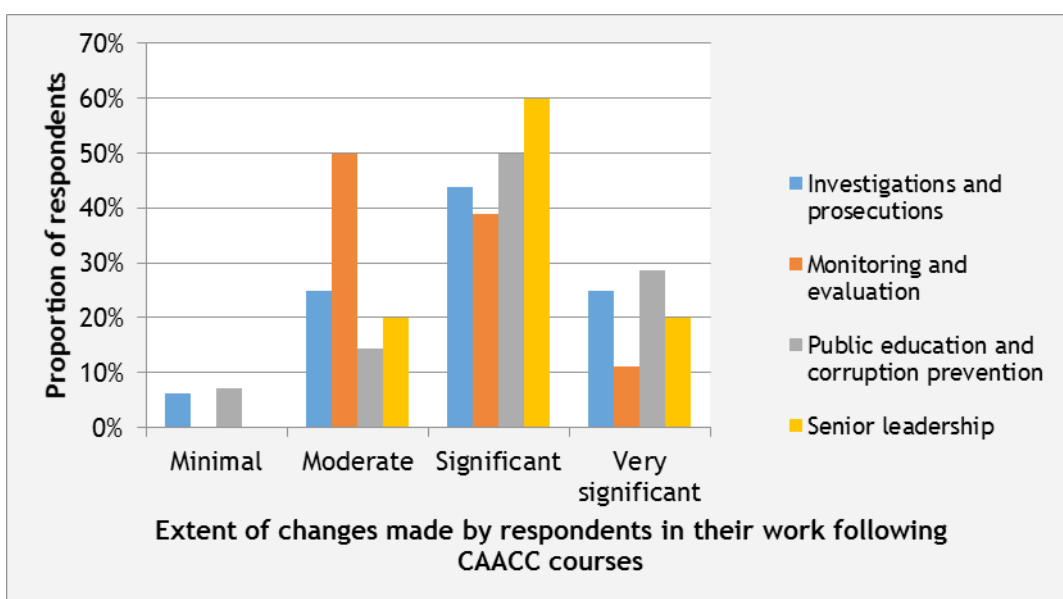
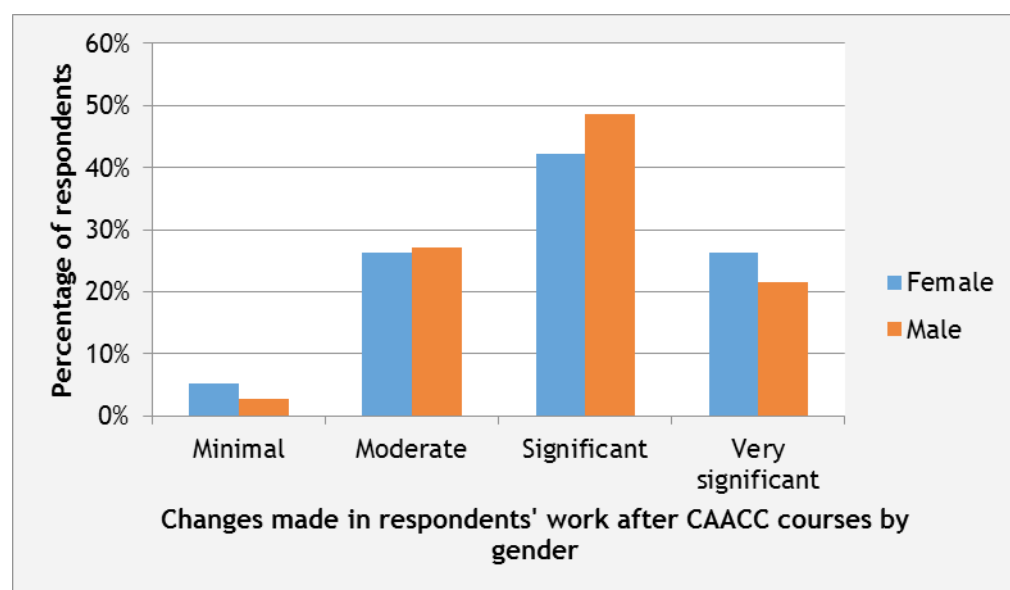


Figure 15 Extent of changes made in online survey respondents' work following return to office from CAACC courses, by gender



Changes in respondents' own work approach following their course attendance

Respondents were asked in question 14 to assess the significance of any changes made in their own work utilising knowledge gained from the training courses they attended. The responses, reported across five experience categories, are presented in Figure 13.

Significant changes were made by a minimum of 75 per cent of respondents in the 5–10, 10–15 and 15–20 years of experience categories. Figure 14 presents the responses assessing the extent of changes that respondents made in their own work utilising knowledge gained from the particular training courses they attended.

The most significant improvements were reported by respondents who attended the Senior Leadership and Public Education and Corruption Prevention courses. The responses assessing the extent of changes respondents made in their own

Figure 16 Extent of respondents' sharing of ideas gained from CAACC courses with colleagues on return to offices, by anti-corruption employment experience

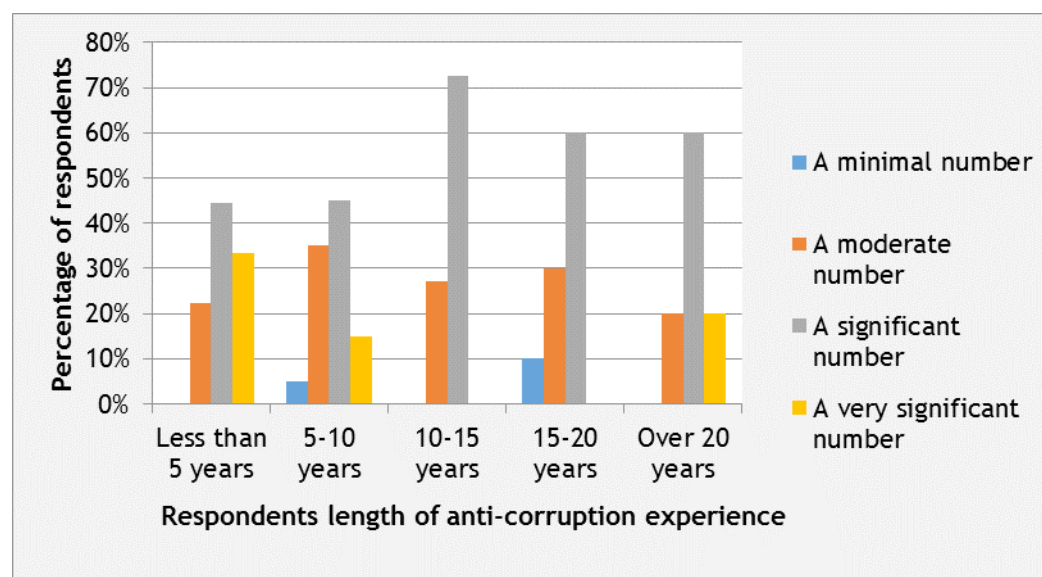
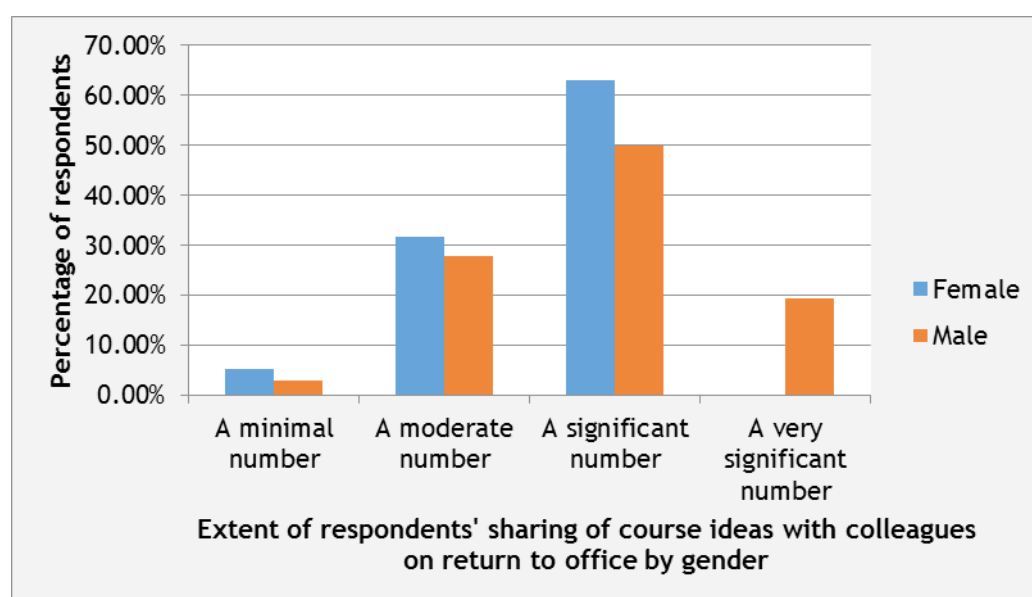


Figure 17 Extent of respondents' sharing of ideas gained from CAACC courses with colleagues on return to offices, by gender



work utilising knowledge gained from the training courses they attended on a gender basis are presented in Figure 15.

At least 68 per cent of all respondents made significant changes in their work after returning from their CAACC courses. Respondents were also asked in question 15 to indicate the extent to which ideas gained at the training courses were subsequently shared with colleagues on their return to their offices. The responses, reported across five categories, are presented in Figure 16.

The over 20 years' experience category was the most active in sharing ideas. Significant sharing of ideas was undertaken by a minimum of 60 per cent of respondents in all experience categories. The responses assessing respondents' sharing of ideas gained from the CAACC courses on their return to their offices on a gender basis are presented in Figure 17.

At least 60 per cent of all respondents when split by gender engaged in a significant level of sharing ideas with their colleagues work after returning from their CAACC courses.

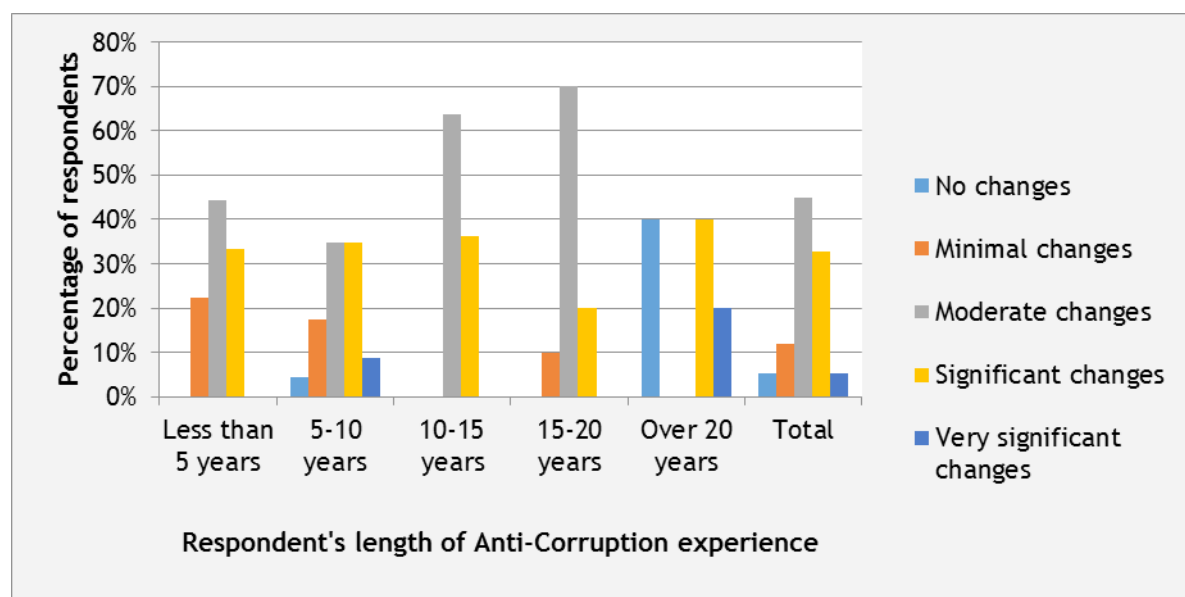
3.4 Overall assessment of personal benefits

The survey evidence indicates that the CAACC courses contributed to improvements in the personal capacity of respondents. This is reflected in the following statistics:

- at least 80 per cent of all respondents considered that CAACC courses had at least significantly expanded their knowledge;
- at least 70 per cent of all respondents reported a significant improvement in their ability to perform their current roles;
- at least 68 per cent of all respondents made significant changes in their work after returning from their CAACC courses.

Improvements in the personal capacity of other staff employed at ACAs may also have been achieved by respondents subsequently sharing ideas gained at the training courses with colleagues on their return to work. At least 60 per cent of all respondents reported engaging in a significant level of sharing of the ideas that were gained at their courses. The survey evidence indicates that the CAACC courses that were reported on were relevant to respondents needs and effective in improving the capacity and capability of agencies' staff.

Figure 18 Extent of procedure/process changes initiated by respondents on return to offices, by anti-corruption employment experience



3.5 Organisational benefits

Significance of changes made in anti-corruption agencies' procedures and/or processes following respondents' course attendance

Respondents were asked in question 16 to assess the significance of any changes made to their organisations' procedures and/or processes as a

result of suggestions they made that arose from knowledge gained at their training courses. The responses, reported across five categories, are presented in Figure 18.

More than 80 per cent of all respondents initiated at least moderate changes to procedures and/or processes upon their return and more than 30 per cent of respondents initiated significant changes. The responses assessing changes initiated by

Figure 19 Changes made in organisations' procedures and/or processes following suggestions made by CAACC course attendees

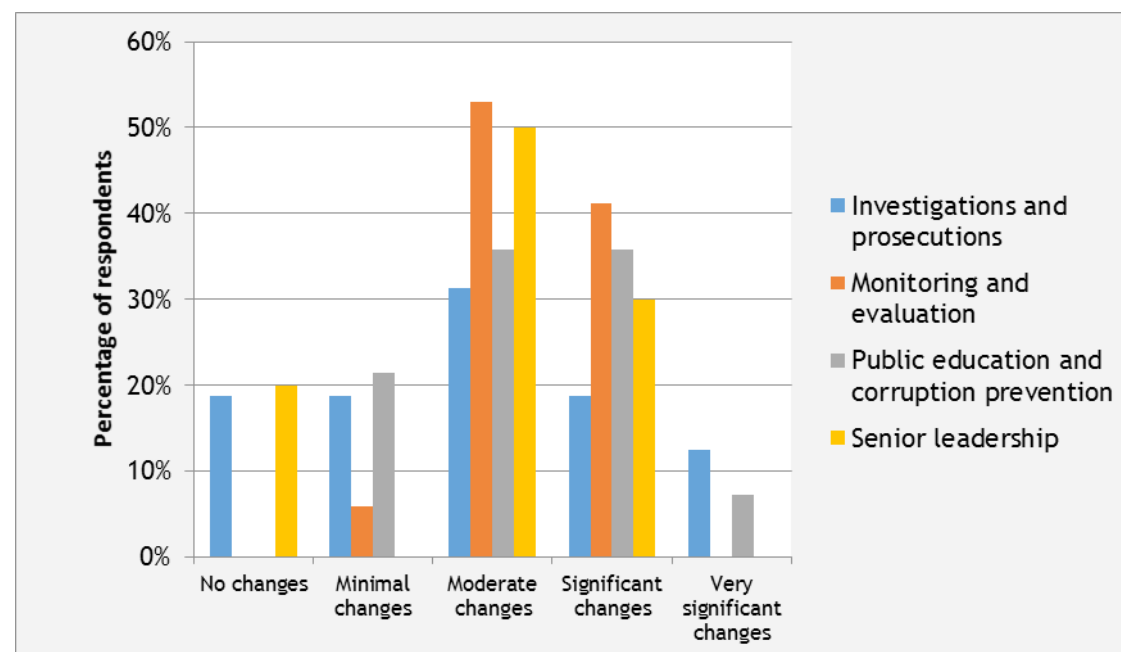
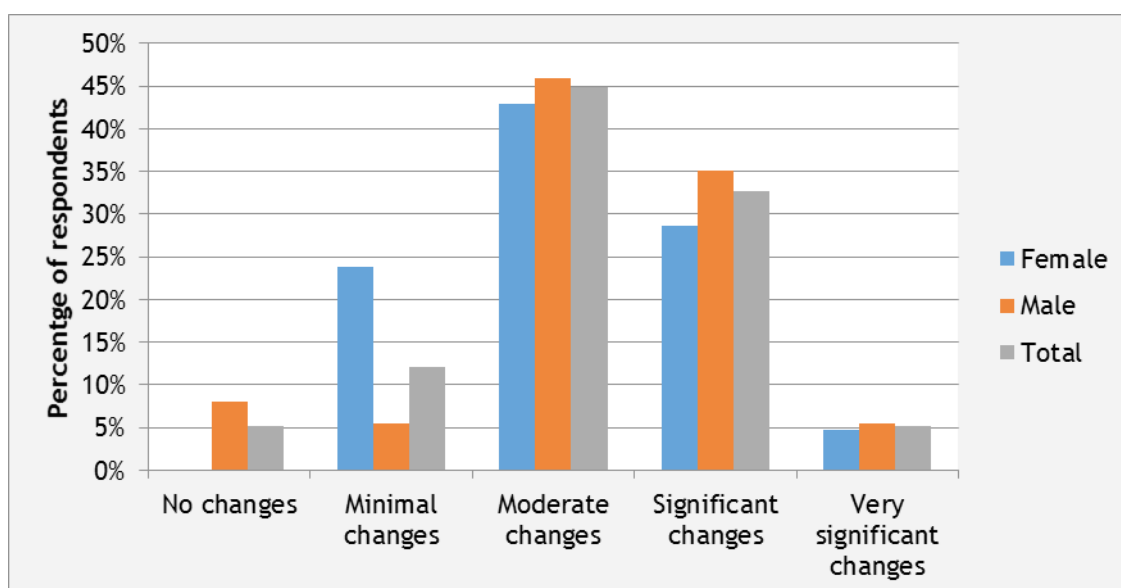


Figure 20 Extent of procedure/process changes initiated by respondents on return to offices, by gender



respondents to procedures and/or processes on their return to their offices from each training course are presented in Figure 19.

The most significant changes made in organisational processes and procedures following suggestions made by respondents' after their attendance at CAACC courses were in the fields of public education and corruption prevention and

monitoring and evaluation, where more than 40 per cent of course attendees reported that significant changes were made. Details of these changes are provided in section 3.6. The responses assessing changes initiated by respondents to procedures and/or processes on their return to their offices on a gender basis are presented in Figure 20.

Figure 21 Sustainability of procedure/process changes made by respondents on return to offices, by anti-corruption employment experience

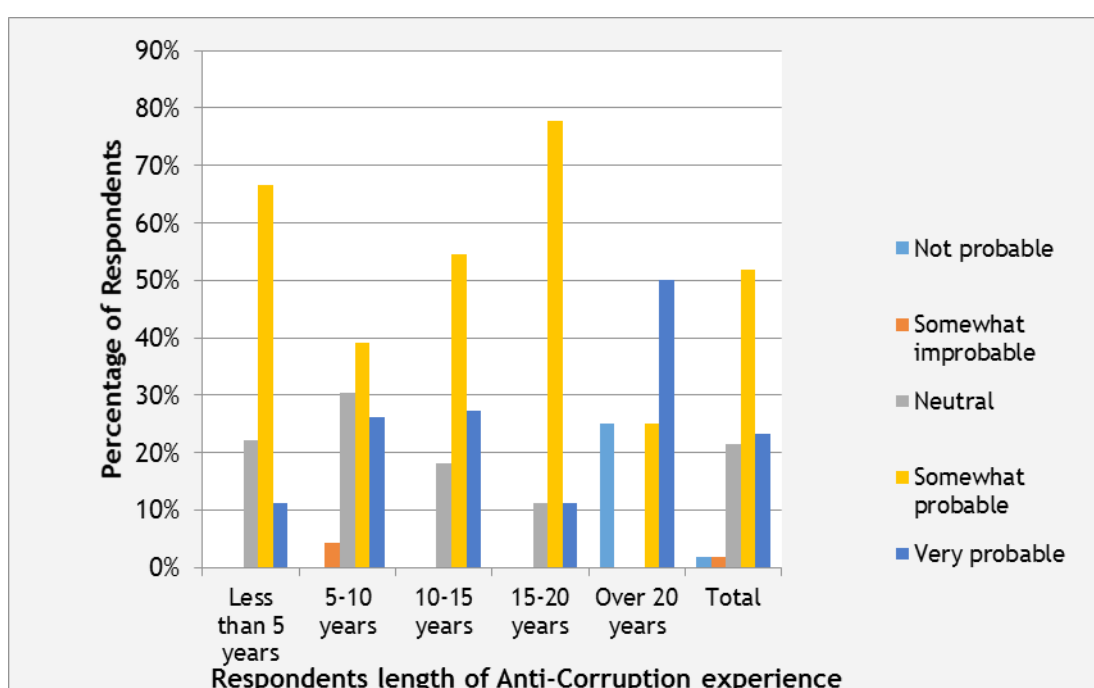
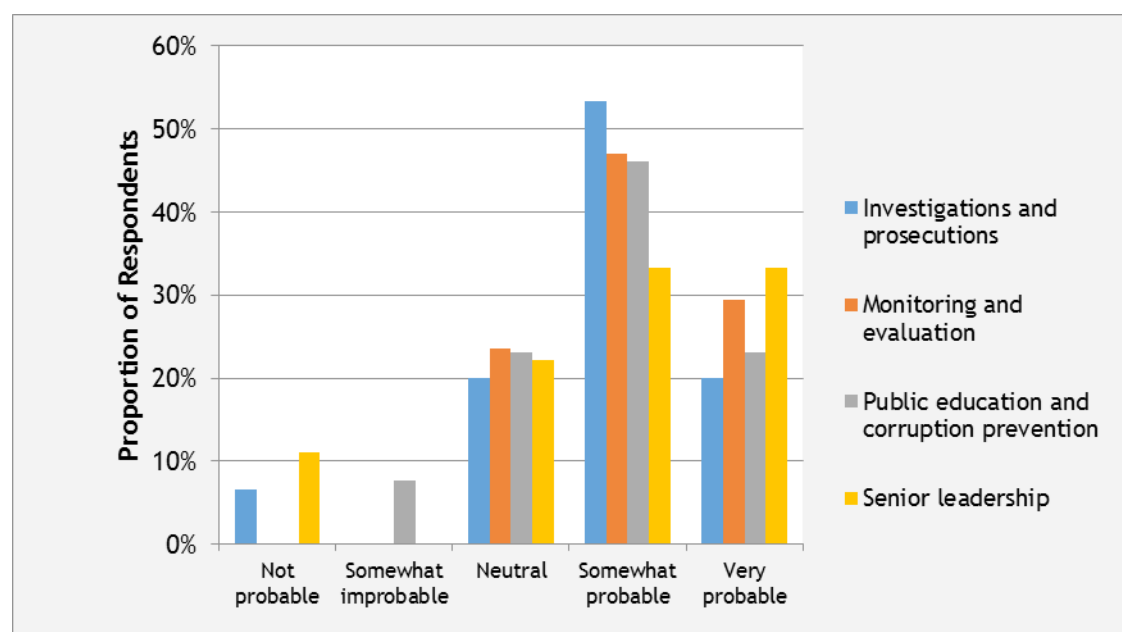


Figure 22 Likely sustainability of procedure/process changes initiated by respondents after course attendance



Both male and female respondents initiated high levels of changes on their return to their offices. Male respondents initiated more significant changes than female respondents.

Sustainability of changes initiated in anti-corruption agencies' procedures and/or

processes following participants' course attendance

Respondents were asked in question 17 to assess the sustainability of any changes to their organisations' procedures and/or processes initiated as a result of suggestions they made arising from knowledge gained at their training courses, to assess the probability that any changes

Figure 23 Sustainability of procedure/process changes initiated by respondents on return to offices, by gender

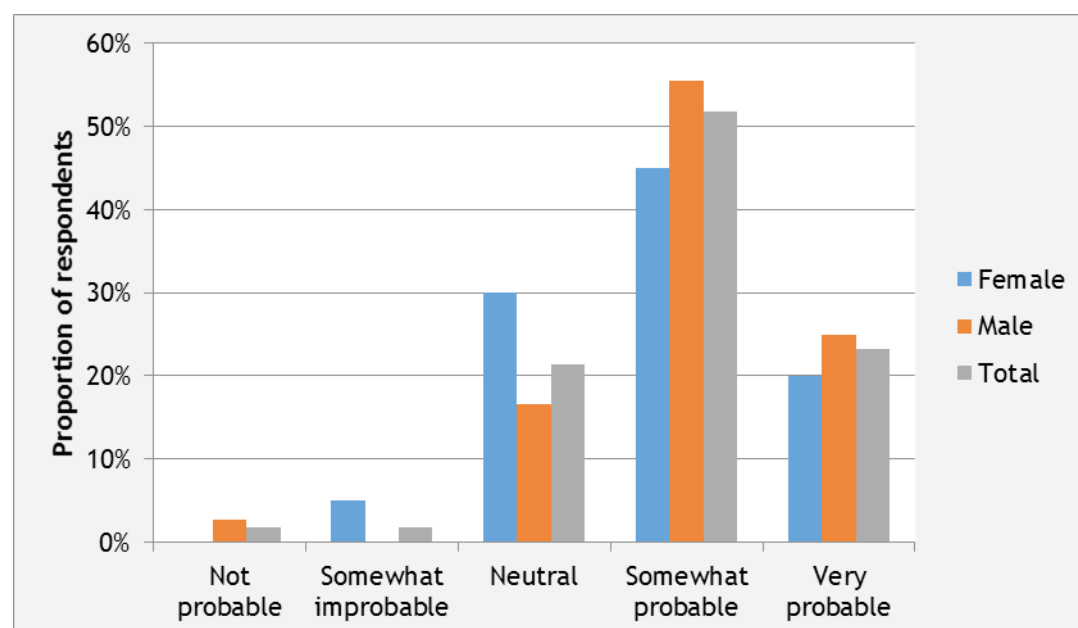
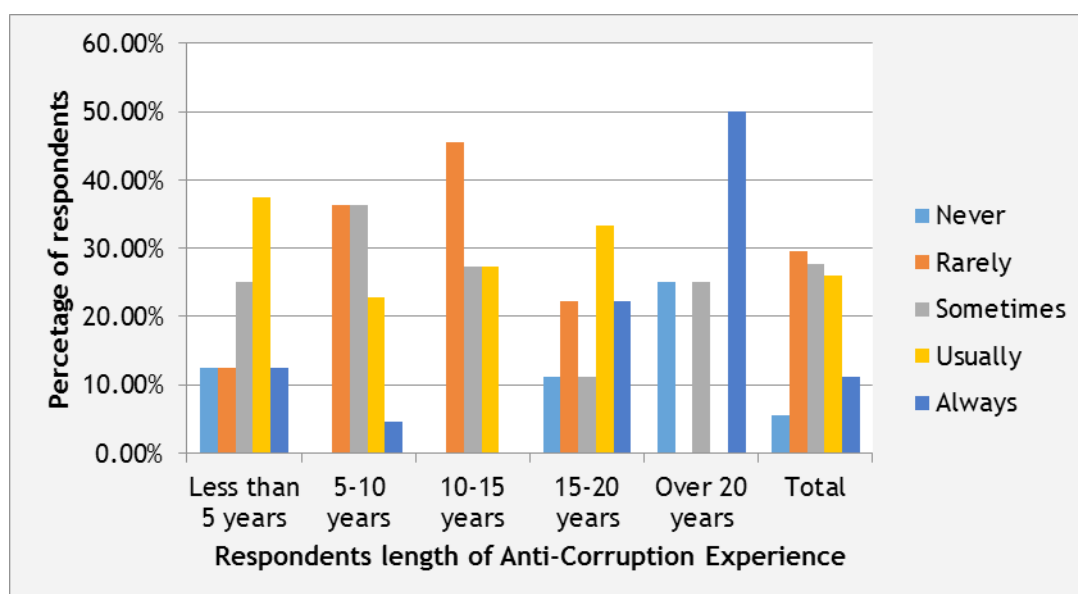


Figure 24 Transparency to outsiders of procedure/process changes initiated by respondents on return to offices, by anti-corruption employment experience



would be permanent. The responses, reported across five experience categories, are presented in Figure 21.

More than 50 per cent of respondents thought it was somewhat probable that changes made to procedures and/or processes following their return to their offices would be sustained and more than 20 per cent thought this was very probable. It could be advantageous for the CAACC to attempt to prepare senior agency staff to encourage returning course participants to discuss with them the possibility of integrating lessons learned into office practice and facilitating the involvement of course participants in the implementation of such changes.

Responses assessing the sustainability of changes initiated by respondents to procedures and/or processes on their return to their offices on a training course basis are presented in Figure 22.

More than 60 per cent of respondents in each training course category had reasonably high expectations that the organisational changes resulting from the course they attended would be sustained. Responses assessing the sustainability of changes initiated by respondents to procedures and/or processes on their return to their offices on a gender basis are presented in Figure 23.

More male than female respondents thought it was either 'somewhat probable' or 'very probable' that changes initiated by respondents to procedures and/or processes on their return to their offices would be sustained.

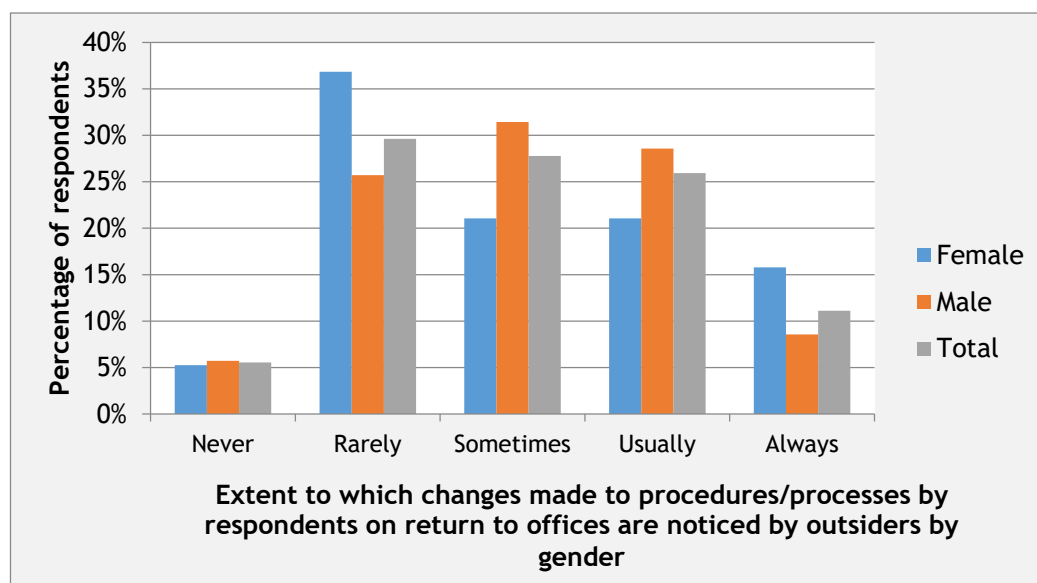
Transparency of changes made in anti-corruption agencies' procedures and/or processes following respondents' course attendance

Respondents were asked in question 18 to comment on how often people outside their organisation had noticed and commented on changes made to their organisations' procedures and/or processes as a result of suggestions they made that arose from knowledge gained at their training courses. The responses, reported across five experience categories, are presented in Figure 24.

More than a third of respondents said that the changes made to their organisations' procedures and/or processes as a result of suggestions they made arising from knowledge gained at their training courses were regularly noticed by people outside their organisation.

Figure 25 presents the responses by gender assessing the extent to which changes initiated by respondents to procedures and/or processes on their return to their offices were noticed.

Figure 25 Transparency to outsiders of procedure/process changes initiated by respondents on return to offices, by gender



Male respondents reported a marginally higher level of awareness overall to changes initiated to procedures and/or processes on their return to their offices than female respondents.

Relevance of changes made in anti-corruption agencies' procedures and/or processes following respondents' course attendance to other public sector organisations

Respondents were asked in question 19 to assess the applicability of any changes made to their organisations' procedures and/or processes as a result of suggestions they made arising from knowledge gained at their training courses to other public sector organisations in their countries. The responses, reported across five experience categories, are presented in Figure 26.

More than 70 per cent of all respondents thought that the changes made to their organisations' procedures and/or processes as a result of

Figure 26 Respondents' assessment of applicability of procedure/process changes initiated on return to offices to other local public sector organisations, by anti-corruption employment experience

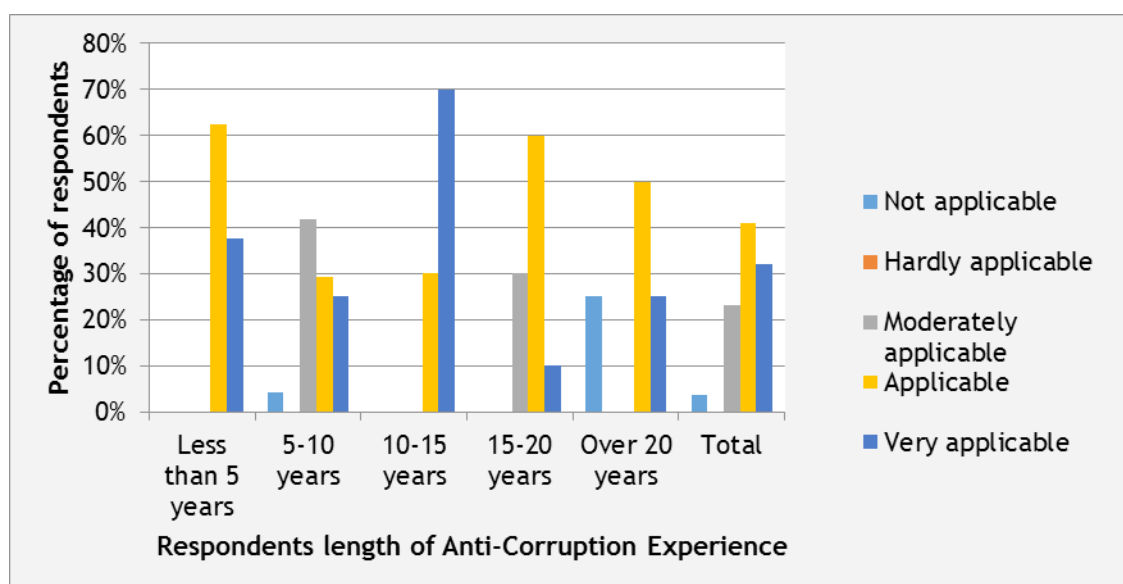
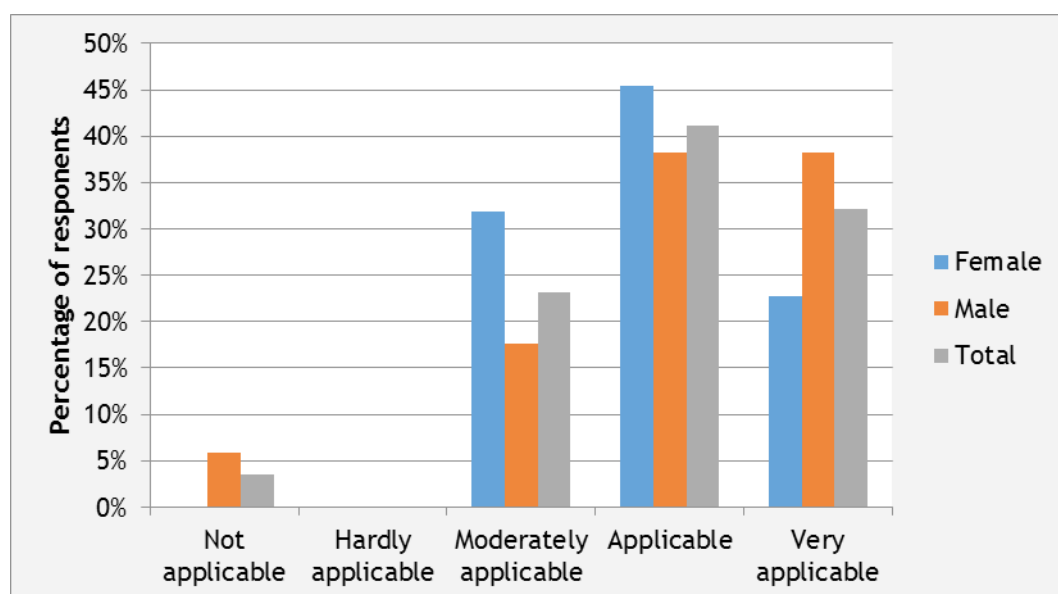


Figure 27 Respondents' assessment of applicability of procedure/process changes made on return to offices to other local public sector organisations, by gender



suggestions they made arising from knowledge gained at their training courses were applicable to other public sector organisations in their countries. All respondents with less than 5 years' and 10–15 years' experience thought the changes made were applicable to other public sector organisations in their countries. The responses by gender assessing the extent to which the changes made by respondents to procedures and/or processes on their return to their offices are applicable to other public sector organisations in their countries are presented in Figure 27.

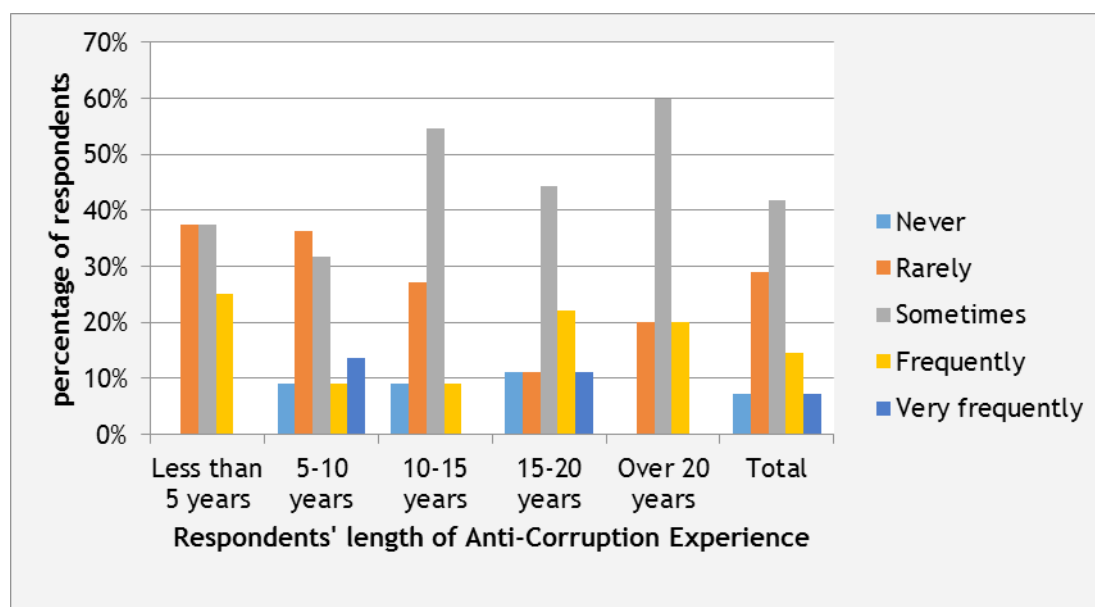
More male respondents than female respondents thought the changes initiated to procedures and/or processes on their return to their offices were either applicable or very applicable to other local public sector organisations.

3.6 Changes made in anti-corruption agencies' procedures and/or processes

Participants were asked in question 20, which was open-ended, to briefly describe the changes made to their organisations' procedures and/or processes as a result of suggestions they made arising from knowledge gained at their training courses. Changes identified by respondents included:

- investigations and prosecutions:
 - adopted financial investigations in every corruption-related investigation (i.e. using financial analysis techniques in all investigations),
 - changes to case management, with the police and investigative officers now following the same case management protocol,
 - improvement in number, quality and timeliness of prosecutions,
 - improvement in working relationships between investigations and prosecutions and between government agencies,
 - introduction of investigative plan and file management,
 - establishment of a central database of those interviewed;
- monitoring and evaluation:
 - carrying out a national survey which resulted in development of data collection and reporting tools for all aspects of our work,
 - development of monitoring and evaluation frameworks, units and monitoring systems,

Figure 28 Respondents' frequency of networking with other course participants following courses, by anti-corruption employment experience



- commencement of institutional capacity assessments,
- implementation of strategic planning,
- improved development of strategic plan;
- public education and prevention:
 - new public outreach programme and close partnership with a civil society organisation established,
 - improvement to education syllabus,
 - public education methods/style changed,
 - two corruption prevention approaches and system analysis implemented,
 - assessing and placing an emphasis on the impact of the design of public education programmes,
 - improved engagement with stakeholders,
 - increased level of relationships with media;
- senior leadership:
 - amendment of the Anti-Corruption Act,
 - process re-engineering (reducing standard time frames),
 - strategic planning session using the knowledge gained through training,
 - more regular management meetings.

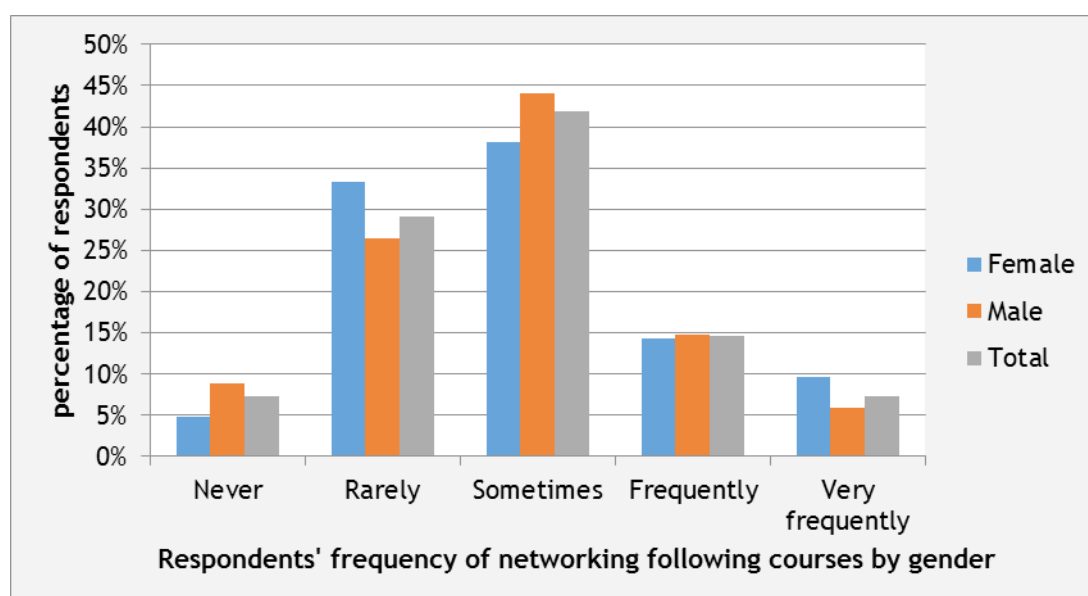
3.7 Overall assessment of organisational benefits

The survey evidence indicates that the different CAACC courses contributed to some improvement in the operations of ACAs following this training. The achievement of organisational improvements is reflected in the following:

- More than 40 per cent of all respondents initiated moderate changes to procedures and/or processes on their return to their offices and more than 30 per cent of respondents initiated significant changes.
- More than 50 per cent of respondents thought it was somewhat probable that changes made to procedures and/or processes following their return to their offices would be sustained and more than 20 per cent thought this was very probable.
- More than a third of respondents said that the changes made to their organisations' procedures and/or processes as a result of suggestions they made arising from knowledge gained at their training courses were regularly noticed by people outside their organisation.

In addition, more than 70 per cent of all respondents thought that the changes made to their organisations' procedures and/or processes as a result of suggestions they made arising from

Figure 29 Respondents' frequency of networking with other course participants following courses, by gender



knowledge gained at their training courses were applicable to other public sector organisations in their countries. The survey evidence indicates that the CAACC courses reported on have also contributed to some improvement in the capacity and capability of agencies.

3.8 Respondents' post-course networking

Respondents were asked in question 21 the frequency with which they were in contact with other course participants to discuss work issues following their attendance at CAACC training courses. The responses, reported across five categories, are presented in Figure 28.

Respondents in the over 20 years' experience category were the most frequent networkers but the overall reported level of frequent networking was modest, at little more than 20 per cent of respondents. The responses by gender assessing how often respondents were in contact with other course participants to discuss work issues following their attendance at CAACC training courses are presented in Figure 29.

Female respondents were very slightly more frequent networkers than male respondents. The method by which participants communicated with other course participants following their attendance at CAACC training courses was examined in question 22. The responses, reported across five

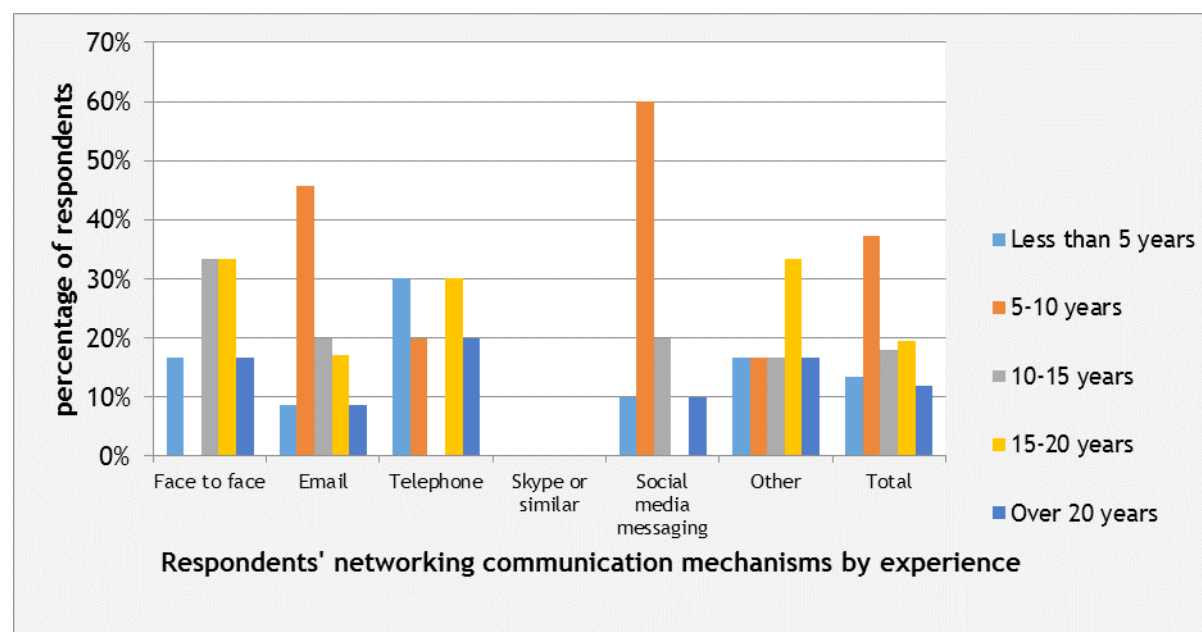
experience categories, are presented in Figure 30. Respondents were able to specify more than one method when answering this question.

The 5–10 years' experience category generally made the most use of the different communication mechanisms and dominated social media and email messaging. Respondents did not use Skype when networking, presumably due to slower broadband. The responses by gender in respect of usage of the different communication mechanisms are presented in Figure 31.

Men used email proportionately more than women when networking but a greater proportion of women used the telephone and messaging on social media than men. Respondents who indicated 'other' in question 22 were asked to identify the method in question 23, which was open-ended. Six of the seven respondents who answered this question used the WhatsApp application when networking.

It could be argued that personal contact is useful for learning, that it will be of greater value as careers progress and that it should be encouraged from the start, provided it is done in a responsible manner. Perhaps CAACC staff should discuss this with ACA colleagues to decide whether or not personal networking should be promoted and, if so, in what terms it should be reported in future surveys.

Figure 30 Respondents' networking communication mechanism, by anti-corruption employment experience



3.9 Overall satisfaction with CAACC

Course participants' overall satisfaction with the CAACC was probed in question 24.

The respondents' overall levels of satisfaction with the CAACC are presented in Figure 32.

At least 50 per cent of all respondents were very satisfied with the CAACC.

The satisfaction responses, reported across five experience categories, are presented in Figure 33.

At least 50 per cent of all experience groups were very satisfied with the CAACC. The highest levels of satisfaction were recorded for the 10–15 years' and 15–20 years' experience groups.

The responses by gender in respect of overall satisfaction with the CAACC are presented in Figure 34.

Figure 31 Respondents' frequency of networking with other course participants following courses, by gender

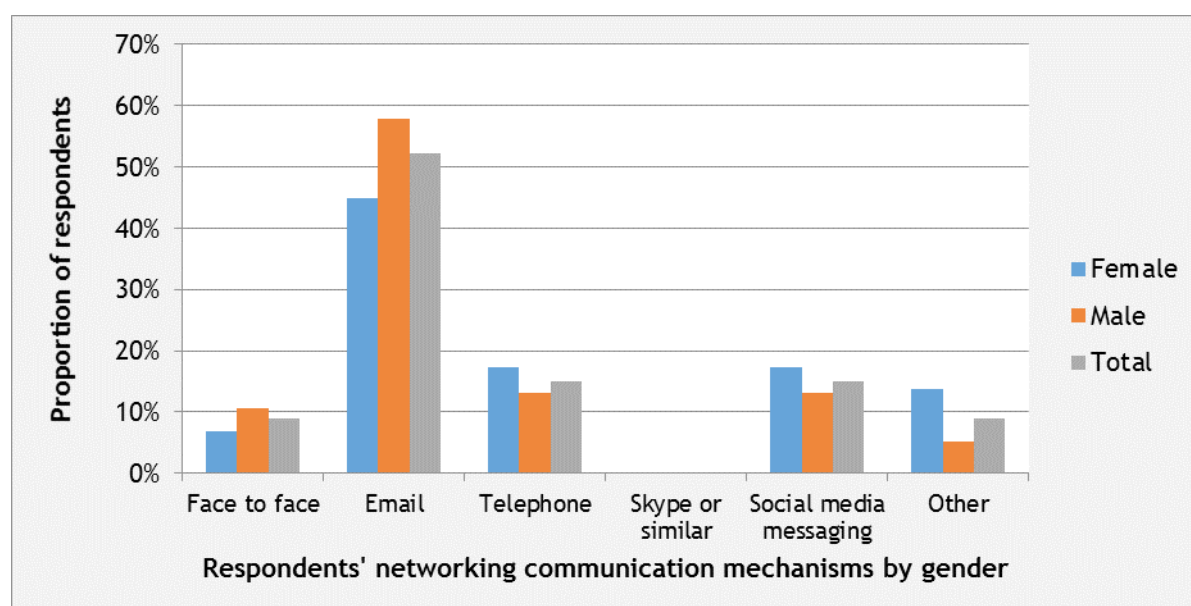
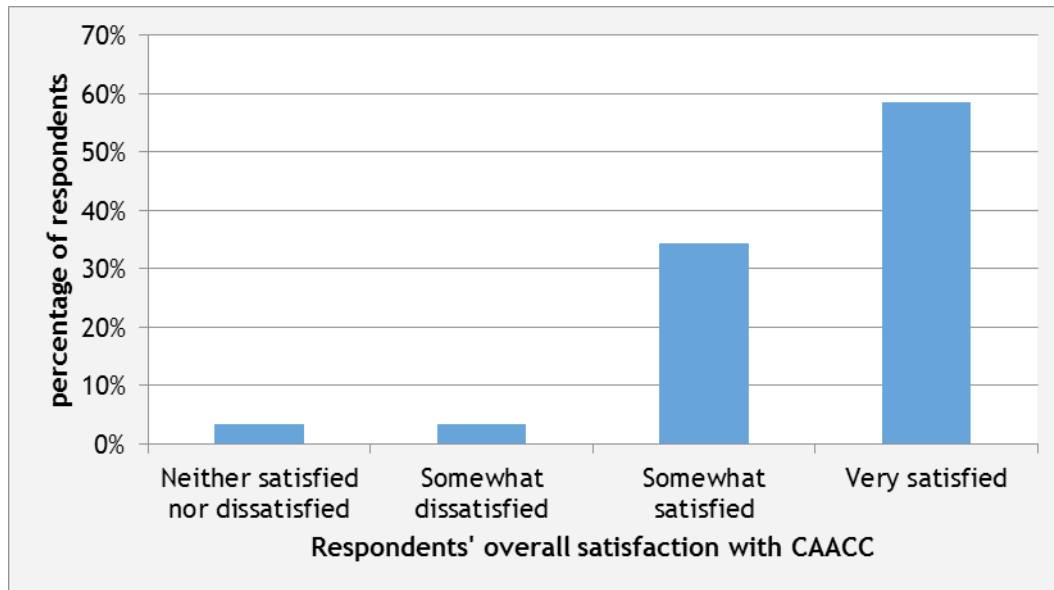


Figure 32 Respondents' overall satisfaction with CAACC



More male respondents were 'very satisfied' with the CAACC than female respondents, although numbers are similar for the 'somewhat satisfied' level. It should be remembered that the

difference between the two categories is highly subjective. It is obvious that very few people expressed dissatisfaction.

Figure 33 Respondents' overall satisfaction with CAACC, by anti-corruption employment experience

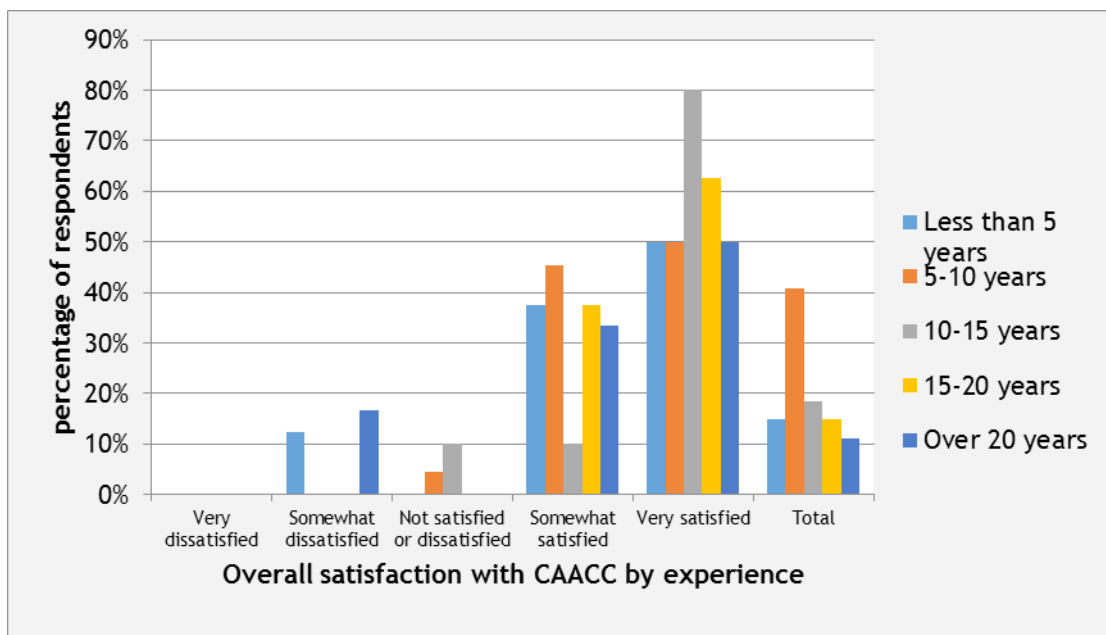
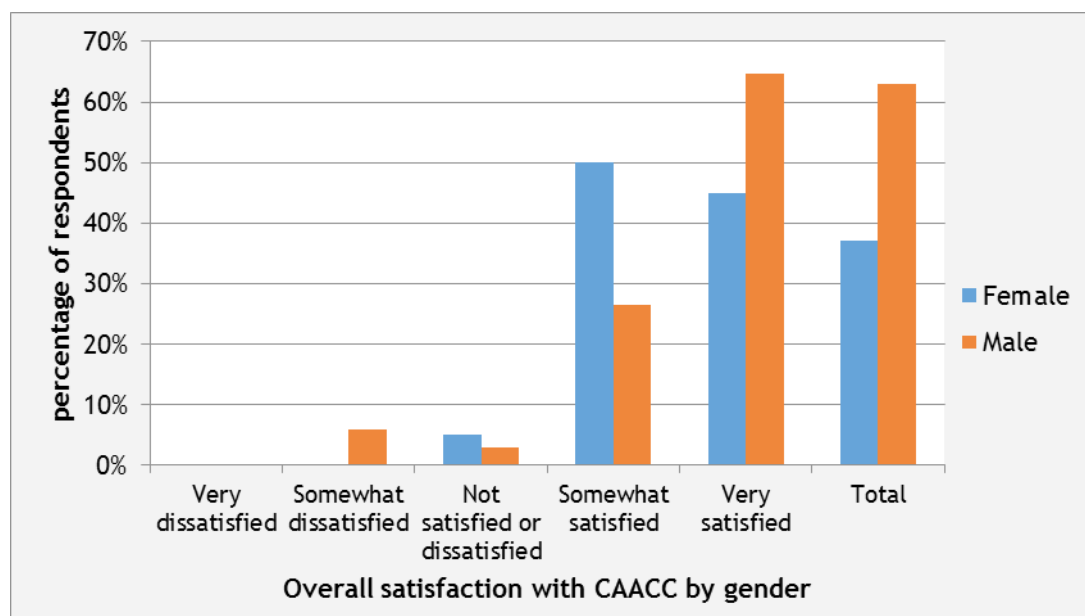


Figure 34 Respondents' overall satisfaction with CAACC, by gender**Table 1 Total numbers of responses from respondents who have undertaken CAACC courses, by training course**

	Senior leadership	Investigations and prosecutions	Public education and corruption prevention	Monitoring and evaluation	Other	Total
Percentage of responses	11	30	19	25	15	100

3.10 Preferred additional learning activities

Participants were asked in question 25 to indicate a preferred additional learning activity that they would like the CAACC to offer. Details of the total responses received from respondents based on the CAACC courses they undertook are presented in Table 1. As some respondents undertook more than one course, respondent numbers for Tables 1 to 3 have been determined using the total number of courses undertaken by respondents answering this question.

Details of the distribution of respondents' preferred learning methods for each type of CAACC course are presented in Table 2.

Details of the distribution of respondents' preferred learning methods across all learning activity options are presented in Table 3.

Courses or workshops were preferred by 59 per cent of respondents, while 41 per cent of respondents preferred some form of online learning activity.

3.11 Comments submitted by respondents

Participants were asked to provide specific comments or suggestions about CAACC learning activities in question 26, which was open-ended. Respondents' comments covered a range of topics including:

- types of learning:
 - online sharing of education and prevention tools,
 - refresher courses on all topics,
 - online mentoring,
 - online learning (more cost-effective),

Table 2 Distribution of respondents' preferred learning methods for CAACC courses (%)

Preferred learning method	Senior leadership	Investigations and prosecutions	Public education and corruption prevention	Monitoring and evaluation	Other	Total
More courses or workshops	11	26	18	24	21	100
Formal structured online learning	11	22	28	28	11	100
On demand podcasts or YouTube presentations	50	50	–	–	–	100
Webinars	–	100	–	–	–	100
Online mentoring	–	67	–	33	–	100
Online project-related advisory sessions	–	50	–	50	–	100

Table 3 Distribution of respondents' preferred learning methods

Preferred learning method	Percentage of total responses
More courses or workshops	59
Formal structured online learning	28
On-demand podcasts or YouTube presentations	3
Webinars	2
Online mentoring	5
Online project-related advisory sessions	3
Total	100

- online sharing of information on investigations,
- visits to organisations to see what is happening on the ground,
- exchange programmes and visits with more advanced ACAs to learn from their experiences,
- web-based seminars,
- running courses in different countries;
- course subject matter:
 - investigations,
 - conducting risk assessments for ACAs,
 - prevention (productive partnership with stakeholders, sustainable prevention initiatives) and investigation (exhibit handling, effecting an arrest procedure, searching persons, collecting and presenting evidence),
 - measuring progress,
 - topics for operational staff, public educators and prevention officers,
 - management/leadership for various staff levels,

- training of trainers on ethics and integrity,
- complex issues, such as the use of virtual currency,
- forensic investigation,
- how to deal with corruption related to cyber- or technology crime;
- CAACC's role:
 - acting as a facilitation centre for training, networking, asset identification, tracing and identifying suspects and cross-border anti-corruption activities in general,
 - conducting research/studies on corruption and its associated impacts, for example corruption and security and stability, corruption and social disintegration, corruption and re-colonisation.

Some criticisms of CAACC courses:

- material was rushed,
- country presentations took up too much time,
- there were no translators,
- the quality of training experts varied,
- the number of courses should not be reduced from that originally proposed.

4. Conclusions

The survey evidence indicates that CAACC courses contribute to improvements in the personal capacity of respondents and in the operations of ACAs. These results demonstrate that CAACC courses are relevant to respondents' needs and are effective in improving the capacity and capability of agencies' staff. The survey also points to demand for additional training across a wide range of anti-corruption activities using a number of training mechanisms, reflecting the complex nature of the anti-corruption activity continuum. Online training and supporting activity is clearly indicated as an approach to be developed.

The limited number of respondents engaged in networking following their attendance at CAACC courses could reflect the CAACC's limited interest in the value of this activity to date. Perhaps the CAACC and ACAs should give this issue further consideration.

Annex 6: Questionnaire - Commonwealth Africa Anti- Corruption Programme Evaluation CAACC Course Participant Survey

First Name

Last Name

Email Address

1. What is your current position?
2. What is the name of the organisation where you are currently employed?
3. What country are you currently working in?

- ☐ Botswana
- ☐ Cameroon
- ☐ Ghana
- ☐ Kenya
- ☐ Lesotho
- ☐ Malawi
- ☐ Mauritius
- ☐ Mozambique
- ☐ Namibia
- ☐ Nigeria
- ☐ Rwanda
- ☐ Seychelles
- ☐ Sierra Leone
- ☐ South Africa
- ☐ Swaziland
- ☐ Tanzania
- ☐ Uganda
- ☐ Zambia

4. Your gender

- ☐ Male
- ☐ Female

5. How long have you been employed in anti-corruption activities?

- ☐ Over 20 years
- ☐ 15–20 years
- ☐ 10–15 years
- ☐ 5–10 years
- ☐ Less than 5 years

6. What training have you undertaken that was organised by the Anti-Corruption Centre (CAACC) in Botswana (please indicate all types).

- ☐ Senior leadership
- ☐ Investigations and prosecutions
- ☐ Public education and corruption prevention
- ☐ Monitoring and evaluation
- ☐ Other

7. If you ticked 'Other training' in Question 6, can you please indicate in the box below the particular nature of training you have undertaken.

8. Did you complete all phases of the training programmes you participated in?

- ☐ Yes
- ☐ No

9. If you did not complete one or more the courses, please can you state, in a few words, why not.
10. How valuable did you find the CAACC training courses you attended?
- ☐ Very good value
- ☐ Good value
- ☐ Fair value
- ☐ Poor value
11. How much did your course expand your current knowledge of the course topic?
- ☐ Very significantly
- ☐ Significantly
- ☐ Moderately
- ☐ A little
- ☐ Not at all
12. 12) How much did your course(s) increase your ability to perform your current role at work?
- ☐ Very significantly
- ☐ Significantly
- ☐ Moderately
- ☐ A little
- ☐ Not at all
13. Thinking about your experience at the CAACC training course(s), how helpful did you consider the course(s) would be to you in the future?
- ☐ Extremely helpful
- ☐ Very helpful
- ☐ Moderately helpful
- ☐ Slightly helpful
- ☐ Not at all helpful
14. Following your return to your office after the CAACC training course(s), how significant were any changes that you made in your own work utilising knowledge gained from your course?
- ☐ Very significant
- ☐ Significant
- ☐ Moderate
- ☐ Minimal
- ☐ None
15. Following your return to your office after the CAACC training course(s), how many ideas gained from your course(s) were you able to share with your colleagues?
- ☐ A very significant number
- ☐ A significant number
- ☐ A moderate number
- ☐ A minimal number
- ☐ None
16. Following your return to your office after the CAACC training course(s), how significant were any changes made to your organisations' procedures and/or processes as a result of suggestions you made arising from knowledge gained from your course(s)?
- ☐ Very significant changes
- ☐ Significant changes
- ☐ Moderate changes
- ☐ Minimal changes
- ☐ No changes
17. If changes were made to your organisation's procedures and/or processes as a result of suggestions you made following your CAACC training course(s), how probable do you think it is that these changes will remain in place permanently?
- ☐ Very probable
- ☐ Somewhat probable
- ☐ Neutral
- ☐ Somewhat improbable
- ☐ Not probable
18. If changes were made to your organisation's procedures and/or processes as a result of suggestions you made following your CAACC training course(s), how often have people outside your organisation noticed and commented on these changes?
- ☐ Always
- ☐ Usually

- ☐ Sometimes
☐ Rarely
☐ Never
19. If changes were made to your organisation's procedures and/or processes as a result of suggestions you made following your CAACC training course(s), do you think that any of these changes would be applicable to any other public sector organisation in your country?
- ☐ Very applicable
☐ Applicable
☐ Moderately applicable
☐ Hardly applicable
☐ Not applicable
20. Please describe below in a few words any changes made to your organisation's procedures and/or processes.
21. Following your attendance at the CAACC training course(s), how frequently have you been in touch with other course participants to discuss work issues?
- ☐ Very frequently
☐ Frequently
☐ Sometimes
☐ Rarely
☐ Never
22. If you are networking with other course participants, how do you communicate?
- ☐ Face-to-face meeting
☐ Email
☐ Mobile/fixed line telephone
☐ Via internet using Skype or similar software
☐ Via internet using social media messaging
☐ Other
23. If you answered 'Other' in question 22, please identify the method used to communicate below.
24. What is your overall level of satisfaction with the CAACC?
- ☐ Very satisfied
☐ Somewhat satisfied
☐ Neither satisfied nor dissatisfied
☐ Somewhat dissatisfied
☐ Very dissatisfied
25. What additional learning activities would you like the CAACC to offer?
- ☐ More courses or workshops
☐ Formal structured online learning
☐ On demand podcasts or YouTube presentations
☐ Webinars
☐ Online mentoring
☐ Online project-related advisory sessions
26. Please provide brief comments below if you have any other comments or suggestions about CAACC learning activities.

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The Commonwealth

Commonwealth Africa Anti- Corruption Programme Evaluation

Management Response



The Commonwealth

Evaluation title	Commonwealth Africa Anti-Corruption Programme Evaluation
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Management response approved by	Senior Management Committee

Overall comments

This evaluation was timely; this is the first time the Secretariat has conducted a comprehensive evaluation of its anti-corruption work stream. The evaluation exercise enabled the secretariat staff and stakeholders to examine the programme so far in assessing its strengths, weaknesses and achievements.

The team of evaluators received a large amount of documents, however much of this was not reflected in the analysis and recommendations. One such example is that a lot of the in-country meetings, twinning arrangements, and study trips continue in the beyond the annual meetings, and were not sighted as part of the evaluation report. These are of huge importance as these facilitate the exchange of knowledge, learning from other commonwealth member states and sharing of best practices.

A report on 'Commonwealth Principles on Promoting Good Governance and Combating Corruption' was developed prior to the evaluation in April 2000 and remains a key backbone to the Anti-Corruption programme. The evaluators failed to recognise the importance of this framework as much of the recommendations are already part of this strategy.

The Anti-Corruption team welcome the recommendation of the evaluation and will endeavour to implement these where possible in its future programming.

Recommendation 1

The Secretariat should prepare a properly articulated, broad-based and appropriately funded anti-corruption strategy and programme of activity that will be supported by performance monitoring and evaluation processes.

Management Response**PARTIALLY AGREED**

The framework for 'Commonwealth Principles on Promoting Good Governance and Combating Corruption' was developed by the Commonwealth Experts Group on Good Governance and the Elimination of Corruption in April 2000, unfortunately this report was not sighted by the consultant for review during the period of the evaluation. This framework addresses national, international and commonwealth actions for combating corruption; and in particular highlights the role of the Commonwealth. However, the Monitoring and Evaluation strategy proposed within this framework.

Recommendation 2

The Secretariat should adopt a more collaborative approach to Cross-Secretariat working. A range of approaches could be utilised in the short term to determine what works best for the anticorruption programme.

Management Response**AGREED**

The Secretariat's restructuring that resulted in the new Governance and Peace directorate, has allowed for collaborative working across all the key teams that handle anti-corruption issues within the Commonwealth Secretariat including: Human Rights, Rule of Law, Public Sector Governance, and Democracy.

Recommendation 3

The Secretariat should facilitate a meeting of ACA members to determine a way forward for the AAACA and the CAACC. Future developments should not be embarked upon unless there is a good measure of agreement on the issues of future funding and collaborative working arrangements between various stakeholders.

Management Response**AGREED**

This recommendation came at a time when the first four years of the anti-corruption project was being concluded and there was no clear financial commitment going forward. The Anti-Corruption programme has now been mainstreamed within its yearly programming and the Government of Botswana will continue to support its Centre activities / funding.

During the Heads of ACAs meeting held at Abuja in May 2018, the heads agreed to fund their staff flights and accommodation to access CAACC training programmes in Botswana.

Recommendation 4

The Secretariat should encourage the use of online platforms for knowledge sharing (e.g. anti-corruption strategies, risk assessments, research material and peer review reports), databases of current operational information (e.g. performance data, inventories of expertise and case reports) and collaboration on policy development (e.g. concerning principles, practices, protocols, model provisions and new approaches to controlling corruption) to help combat corruption.

Management Response**AGREED**

The traditional methods of delivery were one-week face-to-face training sessions delivered in Botswana, but time was not adequate to effectively engage participants pre- and post-training sessions. The e-learning platforms will therefore compliment this traditional learning method.

Recommendation 5

The Secretariat should encourage the use of digital communication for syllabus development and for the delivery of training packages via the CAACC.

Management Response**DEFERRED**

This recommendation is noted for future consideration, however, the current facilities and financing at the Centre are not yet ready for the technological upgrade. Discussions on the future direction of the Centre will consider digitisation.

Recommendation 6

The Secretariat should encourage the CAACC, AAACA and Commonwealth member countries generally to forge closer links between Commonwealth member countries that are engaged in substantial reform programmes, to share their learning.

Management Response**AGREED**

The Secretariat instituted a clear regional strategy to bring all anti-corruption agencies in each region together to share experiences and best practices during the Heads of Anti-Corruption Agencies Annual Meetings.

The Secretariat recognises the importance of cross-regional participation in these annual meetings.

Recommendation 7

The Secretariat should encourage Commonwealth member countries to participate in anti-corruption research activities and become early adopters of research outcomes, where practicable. In the first instance, the Secretariat should make contact with the British Academy to gain an understanding of its current anti-corruption research programme.

Management Response**PARTIALLY AGREED**

Whilst we agree with this recommendation, the secretariat's engagement should be expanded to cover other Commonwealth research institutions.

Recommendation 8

The Secretariat should forge links between the various anticorruption training academies within the Commonwealth, and possibly elsewhere, to share development experiences and cooperate in their institutional development.

Management Response**AGREED**

The Secretariat recognises the importance of establishing links to share best practices, particularly now that we have training centres in Africa and the Caribbean. This collaboration would expand the reach of anti-corruption trainings beyond the anti-corruption agencies to include the entire public sector.

Recommendation 9

The next phase of anti-corruption programming beyond Commonwealth Africa should be centred, in the first instance, on a regionally based programme of small state support.

Management Response**AGREED**

Two-thirds of Commonwealth Countries are small states and largely based in the Caribbean and the Pacific regions. The Secretariat is committed to expand its anti-corruption programmes to these regions.

Recommendation 10

The Secretariat should consider the possibility of offering a more radical programme of reform to smaller states that are prepared to make the necessary commitment.

Management Response**PARTIALLY AGREED**

The Secretariat provides support in response to requests from Member states. However, the secretariat also recognises are also faster in smaller states compared to larger countries and more can be achieved with little resources. The Centre of Excellence on Small States is to take on a central role to support small states to undertake a more radical programme of reforms.

Recommendation 11

The Secretariat should identify the competencies it requires to support Commonwealth states according to its anti-corruption strategy and programme that will be developed in response to recommendation 1 and should establish a strategy for acquiring or maintaining such competencies.

Management Response**AGREED**

The secretariat recognises the broad anti-corruption challenge in the commonwealth and the needs expressed by member states. The secretariat should aim to ensure that it has the necessary competencies to meet these needs all the time.

Recommendation 12

The Secretariat should also determine how to advise member countries on the options that are available to deal with the long-term financial consequences of decisions made to progress a broad-based anti-corruption strategy and programme in response to recommendation 1.

Management Response**AGREED**

The Secretariat responds to requests for support by member states. Once the Secretariat receives the member state's request, an in-depth analysis is conducted and the required technical assistance is provided. The secretariat should consider establishing a referral mechanism where in-house support cannot be given.

Recommendation 13

The Secretariat should consider establishing a mentoring and advisory service in the longer term to assist small states in obtaining development funding for anti-corruption activities and to assist the CAACC in developing suitable stand-alone courses in support of this objective as a short-term measure.

Management Response**AGREED**

The secretariat will continue to facilitate twinning arrangements and practitioner exchanges between anti-corruption agencies to provide longer-term assistance and share best practices.

Recommendation 14

The Secretariat should develop a new TOC (Theory of Change) for its anti-corruption programme and support the development of a new TOC for the AAACA and CAACC under their revised governance arrangements.

Management Response**PARTIALLY AGREED**

A Theory of Change already exists and is embedded within the project design which continues until the end of the Strategic plan, however, following this a new TOC will be developed taking into account the current anti-corruption landscape.

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