

**Mid-term Review**

<b>Title:</b> Anti-Corruption Support – Phase 2.	
<b>Programme Value (full life):</b> CHF 3.94M	<b>Review date:</b> 5-16 December 2022
<b>Project No:</b> 7F-09324.02	

**Summary of Programme Performance**

Year	2022							
Overall Output Score	A							

## Contents

A. SUMMARY AND OVERVIEW .....	3
Description of programme.....	3
Summary supporting narrative for the overall score in this review .....	4
Major lessons and recommendations for the year ahead.....	5
Glossary of Terms.....	7
B: THEORY OF CHANGE AND PROGRESS TOWARDS OUTCOMES .....	8
Impact Indicators.....	9
Outcome Indicators .....	9
Opportunities .....	9
C. DETAILED OUTPUT SCORING .....	13
Output 1.....	13
Lessons learned this year and recommendations for the year ahead .....	14
Output 2.....	15
Lessons learned this year and recommendations for the year ahead .....	16
Output 3.....	18
Lessons learned this year and recommendations for the year ahead .....	19
D: VALUE FOR MONEY .....	19
Output 1.....	20
Output 2.....	20
Output 3.....	20
Conclusion.....	20
E: RISK.....	21
Overview of risk management.....	21
ANNEX I – MID-TERM REVIEW RECOMMENDATIONS .....	23
ANNEX II – RISK ASSESSMENT MATRIX: Credit proposal – 20/2/20 .....	26

## A. SUMMARY AND OVERVIEW

### Description of programme

The Swiss Agency for Development and Cooperation (SDC) has undertaken a Technical Assistance (TA) development programme for anti-corruption in Tanzania. It was designed to identify entry points allowing scrutiny of casework, with a stated impact of increasing *'the risks for those engaging in corruption and financial crimes in Tanzania'*; this programme has been running since 2015 (Anti-Corruption Support – ACS). It was designed as a long-term programme to run from 2015-2020, with a budget of CHF3.16M. Phase 1 (2015-2020), was initially designed and implemented by the Basel Institute for Governance's *International Centre for Asset Recovery* (ICAR), and commissioned to deliver technical assistance to improve the capacity of Tanzania's *Prevention and Combatting of Corruption Bureau* (PCCB) to investigate unexplained wealth, money laundering, and recover assets. This was based on the principle of building capacity through the extrapolation and interpretation of data from live case work.

Some difficulties in delivery forced a rethink to the programme; Phase 2 was approved in April 2020 and intended to run to the end of 2024 with a budget of CHF3.94M. The programme continued its aim *'To increase the risks for those engaged in corruption and financial crimes in Tanzania'* by increasing the capacity of anti-corruption institutions to successfully investigate and prosecute cases of corruption, and recover stolen assets, both domestically and internationally. The premise of the programme is overwhelmingly one based on increasing the capacity of anti-corruption actors to detect and pursue high level offenders of corruption. Complimenting this programme are some excellent demand-side and prevent activity to balance citizen focussed programming.

This mid-term review is the first for this phase of the programme. It was conducted by an independent joint review team in parallel with a similar review of the *Building Sustainable Anti-Corruption Action in Tanzania* (BSAAT) programme. BSAAT is a joint UK-EU funded programme operating in the same space as the ACS; it aims to reduce the role of corruption and Serious Organised Crime (SOC) as a barrier to poverty reduction in Tanzania.

The operating context in the first two years of the Phase 2 of the ACS programme have been challenging for several reasons beyond the control of SDC. Several of these will continue to influence the programme, and offer both opportunity and risk:

1. The withdrawal by PCCB of ICAR's access to live case support in 2020 significantly inhibited the programme's success initially. Furthermore, agreements made between PCCB and ICAR regarding payment of per diems have been subject of revisions. This has led to a position where payments for per diems have resulted in a revised work plan with fewer training events to PCCB due to the additional expense. Further delivery modality changes with the PCCB are required if SDC wish to get closer to initial impact.
2. In October 2022, Tanzania was added to the Financial Action Task Force (FATF) list of 'jurisdictions under increased monitoring', known as the so called 'grey list'. The list includes countries that are assessed to have strategic deficiencies in their national regimes to counter money laundering, terrorist financing and proliferation financing, including corruption. The FATF's process for grey listing, starts with being referred to the special International Co-operation Review Group (ICRG) for one year and offers incentive to drive activity in the areas that the SDC programme is currently engaged in. It stipulates the conditions to be met before Tanzania can be removed from the list. High-level political commitment is essential, offering opportunity for SDC to leverage political willingness to cooperate. An action plan needs to be developed to address specific gaps in the FATF process and this enables SDC and ICAR the ability to use focussed data. The risk to the programme however is also large. FATF 'grey listed' countries tend to prioritise their efforts on achieving the conditions that lead to removal from the list, while other priorities, national, international, or developmental, can be neglected. Zanzibar must also take the same journey as the mainland for FATF; this provides an opportunity for the SDC programme to support this change of direction.
3. President Hassan has declared her candidature to continue in the post of the ruling party's (CCM) chairperson, with calls from within the party for her to remain the sole candidate, after a

period of relative international isolation. The change in political direction following the death of her predecessor should allow a period of stability and provide greater space for SDC and ICAR to work with anti-corruption agencies, thereby negating individual and organisational concerns, and hopefully creating greater transparency and possibly further access to organisations such as PCCB.

4. SDC have indicated that they are interested in using the synergies of their anti-corruption programme to develop closer alignment to BSAAT, including a possible merger of the two. This offers the opportunity to create an intervention that becomes greater than the sum of its individual parts, and to develop greater international concentrated messaging; the EU, UK and Swiss collaboratively selling the same message through one cooperatively funded programme is powerful.

Other factors that have had impact on the programme include, the COVID pandemic and the frequent changes of leadership in partner organisations.

The original 2020 logframe for Phase 2 focussed its outputs entirely on PCCB, and how PCCB functioned within the wider Tanzanian anti-corruption 'system'. These included building capacity regarding intelligence management, investigation, the use of judicial process and statutory tools, and working with other agencies. The issues outlined above, particularly COVID, PCCB's withdrawal of live case access, and political changes, severely inhibited the initiation of Phase 2. Much of the early effort in this phase focussed on renegotiation with PCCB to regain live casework access, to no avail.

In response to these contextual factors, the SDC programme, through ICAR, demonstrated fortitude, agility and resilience in rebuilding stakeholder relationships, developing new partners, and adapting workplans and logframes while maintaining focus on the original outcome and impact, all whilst identifying new entry points, such as the particularly successful transition to Zanzibar. This led to formal amendments being agreed to the programme in May 2022 with a wider set of beneficiary institutions. The workplan and results framework has evolved to deliver the following outputs:

- Strengthen partner agency capability and capacity to conduct complex investigations;
- Strengthen partner agency prosecutorial functions;
- Strengthening partner enabling functions – including training, leadership and inter-agency co-operation to support the delivery of the anti-corruption mandate.

Consequently, the progress in Phase 2 of the programme has only recently gained traction.

### **Summary supporting narrative for the overall score in this review**

This mid-term review has focussed on measuring success against the current Phase 2 logframe in its revised form, which was initiated in 2022. It is recognised however, that Phase 2 built upon the previous iteration of the programme, and to some extent, inherited some of the weaknesses of ICAR's approach.

ICAR's model has been to deliver direct technical support into partner agencies in the anti-corruption chain, primarily PCCB. It appears to the review team that this focus came at a cost to building political buy-in and consensus for the programme with the Government of Tanzania (GoT). Instead, the programme relied upon the then strong relationship it had with the PCCB leadership, to maintain access and legitimacy, in achieving its output.

Without strong political buy-in for the programme, the vulnerabilities of ICAR's approach were exposed, particularly during Magafuli's presidency. His autocratic, centralist style weakened the authority of individual institutions such as PCCB, authority relied upon by SDC to provide ICAR with the necessary access to deliver its live casework support model. Changes in PCCB leadership removed SDC's political influence to progress the programme soon after phase 2 commenced, and ICAR's access, so crucial to its model, was lost. This political influence on the mainland is yet to be rebuilt.<sup>1</sup>

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<sup>1</sup> Despite these setbacks, the programme has shown perseverance and agility in adapting to a Zanzibar focus, commented upon elsewhere in this report.

This absence of political leverage and buy-in for this programme, and the consequential difficulties experienced, illustrate the importance of blending programming at the operational level, with programming at the political level. This issue of leverage, with both GoT and Zanzibar's Government of National Unity (GNU), continues to beset the SDC programme.

By contrast, the BSAAT programme enjoys a good level of political buy-in on the mainland through a Programme Delivery Team (PDT) that has influence and access to the GoT's State House. This provides an opportunity for SDC's programme. For the SDC programme to improve success at the outcome level and deliver anti-corruption building across the *whole* of Tanzania, SDC should seek opportunities to rectify the issue of political influence at the earliest opportunity. Alignment with BSAAT's programme represents a strong opportunity for SDC to draw upon BSAAT's political influence through the complimentary programming.

In respect of the current programme, this review measures success against the revised and current logframe only. In total the Programme has delivered against a total of 8 indicators, spread across 3 outputs:

Output	Weight	Substantially did not meet expectation (C)	Moderately did not meet expectation (B)	Met expectation (A)	Moderately exceeded expectation (A+)	Substantially exceeded expectation (A++)	Total No of Targets	Output Score
1	40%	0	1	0	2	0	3	A
2	40%	0	1	0	1	1	3	A
3	20%	0	1	1	0	0	2	A
<b>Total</b>	<b>100%</b>	<b>0 (0%)</b>	<b>3 (37.5%)</b>	<b>1 (12.5%)</b>	<b>3 (37.5%)</b>	<b>1 (12.5%)</b>	<b>8</b>	<b>A</b>

By meeting or exceeding expectations on 62.5% of targets, the programme justifies an overall score of **A - met expectations**. The programme is broadly on target to meet its outcome of 'increasing the capacity of Tanzania's anti-corruption institutions', or at least the ones it works with.

The overall performance of ICAR has been relatively good within the constraints of the operating space in Tanzania, and the model it adopted. The shift of focus to Zanzibar and the Zanzibar Anti-Corruption and Economic Crimes Agency (ZAECA) and latterly the Zanzibar Director of Prosecutions (ZDPP) has provided a space within which to operate that is not heavily congested. The TA team have been outstanding in developing relationships to adapt the programme that capitalises on ICAR's core value-added of live casework, despite the absence of in-country programme management capacity, and they should be applauded.

The reviewers emphasise that this review has assessed the programme against the current 2022 logframe, revised because of several contextual issues that arose since 2020 (outlined previously in this report). The emergence of those issues was beyond the control of SDC or ICAR, but some were foreseeable, identified as programmatic risks by SDC in their Phase 2 credit proposal.

Were this review to measure the programme against the original 2020 logframe, the assessment of results would be very different, and within the realms of not meeting expectations. The logframe is very different, PCCB centric, and a logframe against which there has been very little opportunity to initiate delivery. Again, the review team reiterate, the resilience and agility demonstrated by the programme, to evolve and adapt the programme and commence delivery in other sectors, is impressive. The territory in which much of the progress is being made may be smaller, but the baseline is lower, and the need greater, particularly in light of FATF grey listing. To measure against the 2020 logframe as the basis of this review would fail to recognise the subsequent effort and resource ICAR and SDC have invested, and continue to invest, to recover this project.

### Major lessons and recommendations for the year ahead

1. The SDC Anti-Corruption Support programme should position itself closer to the BSAAT programme (subject of separate Options Paper). With the withdrawal of PCCB access for live case-support, a core value-added of ICAR expertise is not being utilised on the mainland, and access to data for the purposes of Monitoring and Evaluation (M&E) of training delivery to

PCCB is absent. Clear complementarities exist between the BSAAT and SDC programmes, and in practice beneficial working relationships operate between respective technical advisors, specifically in Zanzibar. To align the programmes closely would provide synergistic effects of access to PCCB performance data, political influence on the mainland through the steering committee to State House and beyond, and to local programme management capacity.

2. The SDC programme should continue with its excellent demand-side work to provide voice and transparency to Civil Society. It can be developed further to support or respond to the supply-side programming. This can be linked to a specific industry or strand of anti-corruption work. For example, using civil society voice on digital platforms in respect of health issues, to highlight the number of complaints PCCB receive, would allow a thematic focus to understand issues around procurement of medical supplies, medicines, or infrastructure by the Office of the Attorney General. The issue of corruption in the health sector is felt at an immediate personal level, especially by the poor, elderly, vulnerable, and young women who disproportionately seek access to public healthcare. By publicising impact on this thematic area will personally resonate with civil society and improve the confidence and volume of that voice.
3. Develop the embryonic ZAECA dashboard that ICAR have introduced, broadening its reach to capture data that measures performance of all partner agencies, and publicise that performance. It should be developed to illustrate efficiency improvements in the processes to address anti-corruption and attach a cost to that efficiency. ICAR should widen it to include the performance of all partner agencies in Zanzibar, thereby developing transparency between agencies through a single dashboard. Closer collaboration with BSAAT can extract benefit from their development of a Dashboard App, not only measure the internal performance of the programme, but also demonstrate outputs and outcome in increasing capacity of anti-corruption agencies.
4. Develop political interest to incentivise change. SDC should capitalise on the excellent political relationships being built by ICAR in Zanzibar to drive strategic interest in anti-corruption by emulating BSAAT's mainland steering committee. SDC should use the influence to mandate attendance to the committee by partner agency leaders, drive the agenda and build a sustainable product that will incentivise buy-in from Zanzibar ministers. Long term change in Zanzibar can happen if SDC can influence the cabinet of the GNU to divert resources towards tackling corruption; the focus of FATF can be the catalyst to initiate and drive this process.
5. The current arrangement of remote project management and scrutiny/governance is insufficient to provide the technical advisors with appropriate support, guidance, and governance. The provision of locally deployed programmatic support to provide secretariat and coordinator functions is necessary to enable the technical advisors to concentrate on optimising technical assistance.
6. While delivering technical capacity building within the beneficiary organisations, technical advisors are frequently identifying small-scale equipment or infrastructure needs that are essential to embed the newly acquired technical skills, tools, processes, and procedures. Currently, arrangements for accessing the resources necessary to resolve the issues are avoidably bureaucratic and cumbersome. Technical advisors and beneficiary organisations should be incentivised to drive objectives through the allocation of a small innovation, challenge, or support fund against which they can bid for such needs.
7. The logframe milestones should be reviewed to become stretching over the life of the programme and evolve into M&E indicators to illustrate whether the practise in question has been institutionally embedded. Currently, many indicators are solely quantitative, even where the output indicator is of a qualitative nature. They are also cumulative. The risk is where an appropriately quantitative indicator has been substantially exceeded, and the following year's measure is cumulative, there develops temptation to lose focus on the performance of that activity and lose momentum to embed and sustain the practise.

A table of recommendations can be found at ANNEX I.

**Glossary of Terms**

ACS	Anti-Corruption Support programme
BSAAT	Building Sustainable Anti-Corruption Action in Tanzania
CCM	Chama Cha Mapinduzi (Tanzania's ruling party)
CJ	Criminal Justice
CPU	Cost per Unit
DG	Director General
EU	European Union
FATF	Financial Action Task Force
GNU	Government of National Unity (Zanzibar)
GoT	Government of Tanzania
ICAR	International Centre for Asset Recovery
ICRG	International Cooperation Review Group
M&E	Monitoring and Evaluation
PCCB	Prevention and Combatting Corruption Bureau
PDT	Programme Delivery Team (BSAAT)
PEA	Political Economy Analysis
PM	Project Manager
SDC	Swiss Agency for Development and Cooperation
SOC	Serious and Organised Crime
SOP	Standard Operating Procedure
TA	Technical Assistance
ToC	Theory of Change
T3	Train-the-Trainer
VfM	Value for Money
ZAECA	Zanzibar Anti-Corruption and Economic Crime Agency
ZDCEA	Zanzibar Drug Control and Enforcement Agency
ZDPP	Zanzibar Director of Prosecutions
ZTOCTF	Zanzibar Transnational Organised Crime Taskforce

## B: THEORY OF CHANGE AND PROGRESS TOWARDS OUTCOMES

**Summarise the programme's theory of change, including any changes to outcome and impact indicators from the original business case.**

The Theory of Change (ToC) for the Programme states the impact hypothesis as follows:

*'If demands formulated by citizens and transported by civil society organisations and media for a corruption free Tanzania are empowering anti-corruption actors; and these anti-corruption actors, notably the PCCB, are increasing their capacity to prevent and combat corruption (through the anti-corruption program); then the risk of getting caught in corrupt behaviour is increasing, making the practice less common and ultimately leading to a new equilibrium in the Tanzanian economy where the rule of law is seen as a more efficient way of doing business'.<sup>2</sup>*

The ToC was devised prior to the involvement of ZAECA or ZDPP as beneficial partners and has not been redrafted since, despite the refocus on new organisations. The concept of the impact hypothesis has been applied to the new organisations as it did to PCCB at the initiation of Phase 2. Although it can be argued this is merely a matter of semantics, it should be addressed. The ToC is intended to be a description of how one thing is expected to lead to another. It should explain what a programme is expected to achieve, how it is expected to achieve it, and why. This is not made entirely clear throughout the SDC documentation.

The ToC draws primarily on *deterrence theory* inasmuch that it infers that the risk of getting caught for corruption will be increased due to the increased capacity of investigation and prosecution agencies, thus making corruption less frequent. It also draws on the theory that the collective influence of civil society to exercise voice communicated through a free media, influences policymaking by the executive through public accountability. This approach, the combination of civil society influences and technical capacity building, is considered by the authors of Zanzibar's Political Economy Analysis (PEA) to be more appropriate than providing technical assistance in isolation.

The assumptions being exercised in the impact hypothesis assumes that there is sufficient will in the political economy for the GoT and GNU, and a media that has the freedom and power to challenge that executive. The recent PEAs for both Tanzania and Zanzibar question whether there is sufficient will to make that change in either government. In the presidency of Magafuli, the espoused will appeared rhetorical and without foundation. The recent intent of President Hassan's candidacy for chairperson of CCM gives hope for greater stability in the medium term, and hopefully foster greater transparency.

The ToC incorporates both demand and supply-side activity to address the problem of anti-corruption, an approach the *Center for Strategic Litigation* recommends in its recent PEA for Zanzibar<sup>3</sup>. Unfortunately, because of the contextual factors that affected the initiation of Phase 2, the demand and supply-sides are being delivered in separate places; SDC's supply-side programming is currently focused in Zanzibar, while the demand-side delivery is on the mainland. The desired symbiotic effect is further constrained where the two sides of programming do not fully understand what the other is doing. It is difficult to conduct complimentary programming in this vein, and an issue that may have been identified and resolved through effective local programme management capacity. The review team recommend that the two sides of programming are developed so that they are mutually supportive of each other.

Despite the contextual factors that have contributed to the evolution of the workplan, the Impact and Outcome of the supply-side programming have remained unchanged. They are appropriately ambitious in intent; to create a hostile Criminal Justice (CJ) environment for those engaging in corruption and financial crime to act as a deterrent, by building the capacity of anti-corruption institutions to investigate and prosecute corruption cases and recover stolen assets; the so-called chain-linked approach. However, what has changed from the initiation of the programme has been the Impact and Outcome Indicators.

<sup>2</sup> Swiss Cooperation Programme Tanzania – 2021-2024

<sup>3</sup> ZANZIBAR: A POLITICAL ECONOMY ANALYSIS The Endless Struggle to Control Corruption, (2022), Center for Strategic Litigation



### *Impact Indicators*

The Impact *statement* has an appropriate external-facing perspective, describing how the change will impact on its external environment. Consequently, its indicators should be qualitative measures that draw a narrative of how the risk is increased to those engaging in corruption. The Impact *Indicators* in this programme however, and their associated milestones, do not effectively support that external perspective. Conversely, they encourage an inward-looking internal perspective, measuring stories and cases filed in court from within the supported agencies, rather than a perspective from the external environment. Furthermore, the cumulative nature of the quantitative milestones remain linear for the duration of the programme and may encourage perverse incentives that frontload the achievement, which encourages a diminished focus subsequently, threatening sustainability. By way of example, for 2023, Impact Indicator 1 has only to achieve one more story in 2023 to have fulfilled the milestone for the entire programme.

Impact Indicator 2 essentially measures outputs of capacity-building of investigation and prosecution agencies, and simultaneously represent inputs to the judicial system. The manifestation of impact will only be felt where justice is seen to be served, and therefore an appropriate measure might be to adapt the indicator's future milestones accordingly to reflect those outputs.

The review team recommend that the impact indicators and milestones are reviewed by SDC in consultation with ICAR to consider including an impact indicator with reference to internationally recognised measures; one such indicator was suggested in the logframe in the Phase 2 programme proposal. This would improve public accountability and provide evidence towards the response to FATF grey listing.

Nevertheless, the programme is demonstrating good progress against the present indicators in the short time the programme has been operating. It is delivering the fundamental elements of process, policy, and capacity among partners, which will lead in the longer term to increased risk to actors involved in corruption.

### *Outcome Indicators*

The intention of the stated outcome is to raise capacity of the institutions to investigate, prosecute and receive stolen assets. The quantitative measures used, non-linear milestones over the lifetime of the programme, become increasingly challenging, providing *some* indication of increasing use of the necessary tools and steps to increase capacity, and the normalisation of their use. ICAR's model of value-added built upon the foundation of case-support. There is potential with this model of support, for the beneficiary organisations to become reliant on that support, and while capacity of throughput is increased, there is a risk that once the support is removed the capacity reduces.

To mitigate this risk, the review team recommends that some measure of capacity to carry out prosecutions and investigations using the newly acquired tools and skills *independently* is built into the future milestones alongside the current measures. This would provide reassurance and a measure of the sustainability of the outcomes; this effectively becomes an evolution from mentoring support presently, to a means of monitoring and evaluating how the training has influenced behavioural change within the beneficial organisations.

In the opinion of the review team, the ICAR model of delivery over the seven-years of the wider programme has somewhat compromised the delivery of the outcome. As mentioned earlier, the focus on technical delivery which has been at the expense of securing political leverage and willingness for the programme, has curtailed delivery in PCCB, and subsequently the scope of delivery on the mainland. The distant nature of project management capacity has certainly not helped; technical advisors are appropriately focussed on the beneficiary organisations whereas a local project manager may have been able to identify and respond to and mitigate the developing political issues at times of uncertainty.

### *Opportunities*

A key inhibitor to the delivery of impact currently is the limitation of assistance being provided to the *wider* Tanzanian anti-corruption chain, particularly in respect of the PCCB. PCCB's withdrawal of

ICAR's access to live cases, a core-strength of their delivery, and the limitations the *per diem* dialogue has had on the capacity of training delivery, has restricted the scope of impact of the programme to Zanzibar. This matter can simultaneously represent both a risk and an opportunity in respect of the FATF grey listing. The absence of SDC's political influence within GoT and GNU risks having their voice unheard in the contribution to the FATF response. However, its current informal collaboration with BSAAT puts it in a good place. Swift formalisation of any BSAAT-SDC programme alignment can draw them into an influential partnership where political influence and willingness is established. The synergies of BSAAT's and SDC's technical capabilities can make them key partners in Tanzania's response and exit from FATF grey listing.

Furthermore, a key link in the chain-led approach is missing in the ACS programme outlined in Impact Indicator 2; that of the judiciary. The capacity of the judiciary to dispense equitable and objective justice is essential if the capacity building efforts of investigators and prosecutors are to achieve their impact. BSAAT are engaged with the judiciary on the mainland and intend to extend that engagement with the judiciary on Zanzibar.

The system of governance that exists in SDC's programme reaches to a steering group occupied by representation from SDC and ICAR, and the Director Generals (DG) of the partner agencies. This steering group does not report further into GoT nor GNU and offers limited influence into either. The programme also suffers from limited local programme management capacity, and as explained earlier is provided remotely from Basel. This places an unnecessary administrative burden on the technical advisors. The BSAAT project steering committee by contrast has a local project management capacity provided by State House personnel, the PDT. This not only offers project management (PM) capacity, but also offers governance reporting channels into State House, offering political channels of influence. Closer alignment with the BSAAT programme could exploit the PM capacity, offer SDC a seat on the Steering Committee and the opportunity to develop an identical governance structure on Zanzibar.

The development of a performance dashboard in ZAECA is an excellent innovation to provide management information to help decision-making regarding resource allocation, prioritisation, and management of risk. However, at present, it represents an inward facing performance management tool, and can be developed further, to deliver strategic impact information of *all* the partner agencies to host government departments. The review team feels that this dashboard should be refocused on measuring outputs and outcome in building anti-corruption capacity for all partner agencies, and exploit the work undertaken by BSAAT by replicating their Dashboard App. This can both improve performance management and influence decision-makers on the reallocation of resources. SDC have limited influence to change this position at present.

### **Justify whether the programme should continue, based on its own merits and in the context of the wider portfolio**

Although this programme has experienced difficulties during Phase 2, its relevance is not in question. Tanzania and Zanzibar have significant reputational issues with corruption, not least among citizens. Corruption is perceived to be endemic in its society, particularly among the political elite, their associates and their 'rent seeking practises'. The anti-corruption message is prominent within the manifestos of recent presidential candidates, although rarely does the rhetoric match the reality of subsequent policies, as outlined in the respective territories' PEAs. The current government's policy for significant infrastructure growth across Tanzania, which will necessarily involve big corporations and government agencies, creates an environment in which corrupt practises can flourish.

The capacity of government institutions, particularly on Zanzibar, whose role it is to detect, investigate and prosecute corruption, and to recover assets gained from corruption is very limited. The reviewers therefore feel that it is wholly appropriate and relevant to focus on building the technical capacity of those organisations charged with tackling corruption to reduce impunity of those engaged in it.

The recent FATF grey listing brings the relevance of the technical support work on Zanzibar into clear relief. Its anti-corruption institutions' relative weakness to those on the mainland make technical support vital. FATF focusses on the whole Tanzanian system, consequently Zanzibar represents the systemic weakness for the FATF response. With limited political voice, the SDC programme is vulnerable to the FATF focus, however, alignment with BSAAT would provide a powerful collaborative voice and broad

reach in technical support across Tanzania; its ability to compliment the BSAAT work into Zanzibar means, in the opinion of the reviewers, that the programme should stay engaged on Zanzibar.

The programme is delivering positive results in capacity building of investigation and prosecution agencies, but the limitations of its scope – most of the technical delivery is limited to Zanzibar – means that its ability to achieve its impact on wider Tanzanian corruption is limited. Reaching out to the mainland to return capacity building there is as important as the work currently being conducted in Zanzibar. The BSAAT programme, with its reach to mainland anti-corruption actors and through the CJ chain on the mainland, including its development of Taskforces in Zanzibar, and its governance structure that has reach into senior levels of Tanzanian government provides a complimentary framework in which to extend the SDC programme's reach and achieve its impact.

In the absence of formalising closer alignment, and as a contingency, SDC should take steps to redesign governance arrangements and the programme steering committee structure so that it mirrors the arrangements held by BSAAT to secure political buy-in and leverage. Furthermore, it should also negotiate with BSAAT to secure a seat onto the mainland's steering committee. Without such a contingency, FATF responses *may* refocus the attention of partner agencies, with their priorities being diverted away from SDC's activities.

Due to an unfortunate series of events, the time provided for engagement with civil society actors was significantly compromised and meant that there was no opportunity to explore the Good Financial Governance Programme.

Limited time however was provided to engage with representatives from Wajibu, JamiiForums and Sikika. Nevertheless, the reviewers found that these three organisations complimented each other in the provision of citizen voice through different methodologies in providing public accountability and transparency:

- JamiiForums - secure online reporting/whistle-blowing mechanisms on the mainland;
- Wajibu – making public accountability documents available to Swahili speakers through social media;
- Sikika – Utilising traditional and social media to provide a health advocacy service and addressing the issue of insufficient availability of medicines which disproportionately impacts the poor, vulnerable, and women.

The excellent work being carried out by these groups in providing the civil society with voice that is heard by anti-corruption actors on the mainland must seek similar reach onto Zanzibar so that the approach asserted in the Zanzibar PEA recommendations is capitalised upon. The review team are of the opinion that the programmes with these groups should encourage expansion in partnership with civil society actors on Zanzibar and replicate the mainland work to create synergies with the supply-side work with ZAECA, ZDPP and the Zanzibar Trans-national Organised Crime Task Force (ZTOCTF).

#### Recommendations:

1. **Merge the SDC programme with BSAAT:** Creating greater alignment to the BSAAT programme should be sought to create synergistic effects. An options paper based on three different levels of collaboration should be produced. The options should include providing SDC with membership of the BSAAT steering committee to afford them greater political leverage. Use SDC's demand side programming to give BSAAT equilibrium and greater citizen focus on the mainland and seek partnerships on Zanzibar to extend reach to that side of the programme. Link the two programmes through the dashboard to communicate success, within both governments, and improve transparency and public accountability.
2. **Build political influence and leverage:** As a contingency for being unable to merge with BSAAT, SDC should take steps to redesign governance arrangements and the programme steering committee structure so that it mirrors the arrangements held by BSAAT to secure political buy-in and leverage. Specifically, it should introduce a PDT equivalent led by technical experts with experience and influence into Zanzibar's State House. The steering committee should report into State House as a mechanism of governance. Additionally, SDC should

negotiate with BSAAT to secure a seat onto the mainland's steering committee, thereby gaining access to PCCB's performance data through reporting mechanisms into State House. Not doing so risks the FATF focus diverting partner agency attention away from the SDC contribution.

3. **Get better at measuring success:** SDC and ICAR should review and refine the logframe indicators and milestones for 2023 and 2024 to consider:
  - a. Impact: indicators and milestones to measure how the programme has impacted on its external environment;
  - b. Outcome: The indicator and milestones should include an additional element that measures partner agencies' increasing capacity to *independently* apply tools/processes over the duration of the programme.
4. **Refocus the ZAECA dashboard:** The current dashboard should refocus on outputs and outcome in building anti-corruption capacity of all partner agencies in the programme. It should exploit the work undertaken by BSAAT and emulate the Dashboard App developed by them. It should provide greater performance management of the partner agencies, with potential to measure resource efficiency. This could be used to feed performance into government entities and use the focus of FATF to drive further results, and potentially influence public perception. This in-turn should drive external accountability on the GNU and collaborate with the demand side programme to do so.
5. **Make Civil Society's voice heard further:** as asserted by Zanzibar's PEA, a blended approach of demand- and supply-side activity is more likely to yield results than by any single approach. The excellent demand-side activity on the mainland should be extended to Zanzibar by fostering operational alliances with key Zanzibar actors to extend reach onto the island, replicate the mainland work and compliment the technical capacity building activity to achieve synergistic results in increasing public accountability of Zanzibar's institutions.

## C. DETAILED OUTPUT SCORING

## Output 1

<b>Output Title</b>	Strengthen partner agency capability and capacity to conduct complex investigations.		
Output number:	1	Output Score:	<b>A</b>
Impact weighting (%):	40%	Weighting revised since last review?	N/A

Indicator(s)	Milestone(s) for this review	Progress
1.1	4 tools or processes introduced to partner agencies to enhance the conduct of complex investigations	<b>A+ - Moderately exceeded expectations</b> 7 cases in which tools/processes were applied against a milestone of 4. They are: PCCB - ANACAPA; ZAECA - Case Tracking, Prioritisation Matrix, Exhibit Management processes, Informant Handling, Monthly Dashboard; TOCTF - Intelligence Management
1.2	Testimonials from ZAECA to assess the relevance and applicability of foundation level training; introduction of basic intel & investigative processes; and investigative support to ongoing case support	<b>A+ - Moderately exceeded expectations</b> Positive testimonials received from 3 agencies: ZAECA – Introduction of investigation support, and processes for investigation management and exhibit management, development of training function, training delivery, casework support; ZDCEA – Intel Training & Process Development, and Senior Leadership Training; ZTOCTF - Intel Training & Process Development.
1.3	180 trainees successfully completing ICAR supported investigations related training	<b>B – Moderately did not meet expectation</b> 131 trainee's vs milestone of 180. Although the milestone is under-achieved by c. 30%, PCCB involvement in courses has been reduced due a revised workplan linked to increased costs associated with per diem payments and access to M&E data. The delivery of courses to this magnitude with the remainder of agencies is positive.

**Briefly describe the output's activities and provide supporting narrative for the score.**

The intent of this output is designed to build the investigative capacities of those agencies with whom the programme is engaged; currently PCCB, ZAECA, ZDPP and ZTOCTF. The PCCB relationship is long-standing from 2015 (Phase 1), while the remaining organisations are more recent. The focus of the activity has been to equip the organisations with the basic skills and processes to assess, prioritise and conduct investigations in a proportionate and equitable fashion. The programme moderately exceeded expectations on two output indicators and moderately missed expectations on one other, leading to an overall score of **A – Met expectations**.

With PCCB, ICAR have attempted to renegotiate access to live cases following PCCB's withdrawal and had to revisit agreements on the issue of *per diem* payments to trainees. The former, a key value-added for the ICAR model, is unlikely succeed in the short-term, while the latter has culminated an agreement to deliver a reduced training work plan to PCCB, in order to accommodate the increased cost of trainees *per diem* payments. Because of ICAR interventions PCCB now has capacity to utilise the ANACAPA

tool to assist in the mapping of corruption actors which can help inform intelligence gathering and investigation strategies. In their meeting with reviewers, director level officers complimented the training they had received and outlined examples of its benefit.

Nevertheless, the programme has shown resilience, determination, and agility to adapt its delivery into the Zanzibar based authorities. Over the last year the programme has undertaken a rapid needs assessment to baseline current capacity within ZAECA and develop a workplan. The baseline identified low investigative capacity, and therefore ZAECA has become the main, but not sole, focus of this investigative output. The programme has focussed on providing the foundation blocks for building investigative capacity; policy and procedure to introduce standard practise for prioritising and tracking cases, managing exhibits, handling informants, and producing a regular dashboard for performance management purposes. These provide the foundations on which to strengthen investigative capacity and capability. These processes will likely result in better management of cases, improved management oversight and performance management with improved CJ outcomes.

The delivery of investigative training is c.27% below the cumulative targeted training deliveries of 180 sessions, 39% on the year. This is not surprising given the difficulties with delivering training to PCCB, who did not receive any investigative related training. Again, the agility of the programme to evolve its focus on Zanzibar is laudable, and to have achieved the training delivery that they did in only part of the year is a positive achievement. However, the review team recommend that the technical advisor should determine how much training can be provided to PCCB and amend the milestone 1.3 accordingly in agreement with SDC. Otherwise, this milestone will continue to be challenging.

Close working collaborative relationships with the BSAAT programme has exploited the opportunity for collaboration with the BSAAT programme who are developing a cross-institutional taskforce in Zanzibar (ZTOCTF) by introducing Intelligence Management processes. This close working relationship is commendable and is encouraged by the review team. Commensurate with an emerging common theme through this report, closer formal alignment of these programmes is encouraged.

### **Lessons learned this year and recommendations for the year ahead**

This is the first mid-term review of this Phase 2 programme. The reviewers felt that there were several areas in which this output could be improved:

- Quantitative milestones for output indicators 1.1 and 1.3 are linear in nature and cumulative. This can lead to perverse outcomes of losing focus on one area that has exceeded expectations and threaten sustainability by processes not being embedded subsequently. For example Milestone 1 of Output indicator 1.1 already exceeds Milestone 2 without any additional tools or processes being introduced over the next 12 months. The review team recommend a review of these milestones to remove the cumulative element and provide a clear illustration of that year's activity. For example:
  - Output Indicator 1.1 milestones could be amended to measure further processes/tools introduced, with an additional measure of their effective use;
  - Output Indicator 1.3 milestones could be amended to measure training delivery and introduce a measure of formal and progressive training evaluation (Kirkpatrick Level 3 in 2023, Level 4 in 2024).
- The qualitative element of Output Indicator 1.2 is focussed on ZAECA and does not reflect the wider agencies being supported. The review team feel that milestones are too focussed on how ZAECA assess the benefit the training has on its own investigations, and not how partner agencies further along the CJ chain perceive the benefits through improved case quality. The review team recommend that Output Indicator 2 and its milestones be amended to capture the testimonials not only of beneficiary agencies of their own impact, but also of their external stakeholders such as ZDPP and the judiciary.

The review team feel that the development of a performance dashboard for ZAECA is a positive step. The team recommends that the SDC programme builds upon this development to collaborate further with the BSAAT programme who are developing a dashboard to which all their beneficiary organisations are contributing, and in turn access PCCB data (see recommendation 4 above; *Refocus the ZAECA*

*dashboard*). The principle of ZAECA's dashboard should be further developed in line with BSAAT's Dashboard App to measure *all* partner agency outputs in this programme and outcome in increasing capacity of anti-corruption agencies. Its utility should be raised to illustrate progressive impact of the project to influence political will and divert resources and use the focus of FATF to drive further results.

Recommendation for Output 1:

1. **Get better at measuring success:** SDC and ICAR should review and refine the logframe indicators and milestones for 2023 and 2024 to consider:
  - c. Outputs: Remove cumulative indicators, provide annual milestones, and have increasingly challenging milestones during the remainder of the programme. The qualitative indicators should also seek testimonials from dependant stakeholders in the anti-corruption CJ chain.

## Output 2

<b>Output Title</b>	Strengthen partner agency prosecutorial functions.		
Output number:	2	Output Score:	<b>A</b>
Impact weighting (%):	40%	Weighting revised since last review?	N/A

Indicator(s)	Milestone(s) for this review	Progress
2.1	2 tools or processes introduced to partner agencies to strengthen the prosecution of complex cases	<b>A+ - Moderately exceeded expectation</b> 5 tools/processes introduced against a milestone of 2. These include Structured Legal Form, Individual Work Log, Case Chronology sheet, Court Minute Sheet, Pre-trial Checklist.
2.2	Testimonials from ZDPP to assess the relevance and applicability of key priority prosecutions training; knowledge management and workflow.	<b>B – Moderately did not meet expectation</b> Testimony not yet received from ZDPP. However, the reviewers met with the DPP who outlined, in broad terms, the improvements that are anticipated from the positive work being undertaken.
2.3	24 trainees successfully completing ICAR supported prosecutions related training	<b>A++ - Substantially exceeded expectation</b> 71 training deliveries vs milestone of 24 which exceeds the 2024 cumulative milestone, and exceptional given that no PCCB trainees were available for training due to ongoing <i>per diem</i> dialogue. Case Analysis & Preparation Course Court Advocacy Skills Courses (inc. T3 knowledge transfer)

### Briefly describe the output's activities and provide supporting narrative for the score.

Like Output 1, Output 2 intends to provide the prosecution agency, in this case the ZDPP on Zanzibar, with fundamental good practise in relation to prosecutions, asset recovery and the provision of advice and support to investigators. This includes policies, procedures, and practises to improve and standardise case-work record keeping, decision-making accountability, and advocacy practise. The programme has substantially exceeded expectation in one area, moderately exceeded in another, and

moderately failed to meet expectation in a third area, leading to an overall score of **A – met expectations**.

Several Training events have been delivered to the ZDPP including Advocacy Training, and Case Preparation & Analysis, to international standards. To underpin this training the advisors have developed and introduced Standard Operating Procedures (SOP) into ZDPP's practises and introduced a range of casework tools and documents to standardise and enhance the provision of legal advice, record management, decision-making, accountability, and performance management. This model of training has now been adopted by the ZDPP Training facility. Additionally, a Train-the-Trainers (T3) course was completed to enable the establishment of an in-house capability for court presentation advocacy skills. These training events have delivered to more delegates in the first year than was intended for the entire programme; 33% more. To maintain momentum, the 2023 and 2024 milestones should be reviewed urgently, otherwise there is a risk that the momentum and sustainability of the training will be lost.

The building of strong foundations in equipping the organisation with the tools and skills of international advocacy and prosecutorial standards is a good basis from which to deliver this output, with a clear workplan to move forward.

Unfortunately, the ZDPP is yet to provide a documented testimonial to the programme, however in a meeting with the reviewers the DPP spoke positively of the benefits his organisation had received. An issue raised by the ZDPP related to access to hardware, primarily computer hardware to support and create further efficiencies in the implemented processes. This is an operational risk raised by the technical advisor in his bi-annual operational report, who rightly points out that effective change could be inhibited by lack of infrastructure. The review team concur with the technical advisor's position and recommends that ICAR make provision of a 'Challenge Fund' be made available in the budget that enables the technical advisors to bid for equipment and infrastructure needs with strict criteria for authorisation and quick decision-making timeframes. This will encourage innovations and swift and sustainable resolution for problems as they arise. This 'Challenge Fund' should consist of:

- A separate budget line of otherwise unallocated funds;
- A nominal cap to expenditure in each application;
- Decision-making at Programme Manager level;
- Clear criteria set that supports sustainable delivery of activity outputs linked to programme outcome;
- A standardised procedure through which technical advisors or beneficiary agencies can apply to the fund, with clear timescales for quick decision making;
- Associated risk should be documented, and support should be limited to non-operational capability development, and not direct financial support for operational activity.

The Prosecutions Technical Advisor has recently left the programme and plans to replace them are unclear. The ICAR model and its core value-added is predicated on the provision of technical and case-work advice working within the beneficiary organisation. Although the Investigations Technical Advisor is endeavouring to cover this output, a Prosecutions Advisor should be recruited at the earliest opportunity.

### **Lessons learned this year and recommendations for the year ahead**

This is the first mid-term review of this Phase 2 programme. The reviewers felt that there were several areas in which this output could be improved, in a similar fashion to Output 1.

- Quantitative milestones for Output Indicators 2.1 and 2.3 are linear in nature and cumulative. This can lead to perverse outcomes of losing focus on one area that has exceeded expectations and threaten the sustainability of the output by not embedding the capability subsequently. For example, Milestone 1 of Output Indicator 2.3 already exceeds Milestone 3 without any further tools or processes being introduced over the next 24 months. The review team recommend a review of these milestones to remove the cumulative element and provide a clear illustration of that year's activity. For example:



- Output Indicator 2.1 milestones could be amended to measure further processes/tools introduced, and a measure of their use;
- Output Indicator 2.3 milestones could be amended to measure training delivery and introduce a measure of formal and progressive training evaluation (Kirkpatrick Level 3 in 2023, Level 4 in 2024).
- The qualitative elements of Output Indicator 2.2 are too focussed on how the ZDPP assesses the benefits of their *own* change, and not how other dependant partner organisations within the CJ chain perceive that benefit. The review team recommend that Output Indicator 2.2 milestones be amended to capture the testimonials not only of ZDPP's perspective, but also of their external stakeholders such as ZAECA, ZTOCTF and the judiciary. Each of these agencies will have a perspective on the change and provide a richer picture of how the prosecution function has been strengthened.
- The review team would encourage the programme to consider how key performance data for the ZDPP could be incorporated into a wider dashboard of anti-corruption partners on the mainland and in Zanzibar through closer collaboration with the BSAAT programme. This could inform not only internal performance management processes, but improve visibility, accountability, and equity with mainland partners in the response to the FATF grey-listing Action Plan.

The review team feel that the development of a performance dashboard for ZAECA is a positive step. The team recommends that the SDC programme builds upon this development to collaborate further with the BSAAT programme who are developing a dashboard to which all their beneficiary organisations are contributing, and access PCCB data.

#### Recommendations for Output 2:

1. **Recruit Prosecutions Technical Advisor:** The ICAR model and its core value-added is predicated on the provision of technical and case-work advice working on the inside of an organisation. Although the Investigations Technical Advisor is endeavouring to cover this output, a Prosecutions Advisor should be recruited at the earliest opportunity. This is the most embryonic of the outputs and needs attention at the earliest opportunity to avoid loss of momentum.
2. **Encourage innovation:** From within the current budget, introduce a 'Challenge Fund' that enables the technical advisors and partner agencies to bid for equipment and infrastructure needs, within strict criteria, for authorisation within short decision-making timeframes. This will encourage swift, innovative, and sustainable resolutions for problems as they arise, without unnecessary bureaucratic delay. Criteria will need to be set by ICAR, but suggest they focus on sustainable solutions with appropriate consideration of risk, that do not venture into the operational space.
3. **Get better at measuring success:** SDC and ICAR should review and refine the logframe indicators and milestones for 2023 and 2024 to consider:
  - c. Outputs: Remove cumulative indicators, provide annual milestones, and have increasingly challenging milestones during the remainder of the programme. The qualitative indicators should also seek testimonials from dependant stakeholders

**Output 3**

<b>Output Title</b>	Strengthen partner enabling functions including training, leadership, inter-agency cooperation to support the delivery of the anti-corruption mandate.		
Output number:	3	Output Score:	<b>A</b>
Impact weighting (%):	20%	Weighting revised since last review?	N/A

<b>Indicator(s)</b>	<b>Milestone(s) for this review</b>	<b>Progress</b>
3.1	Number of training and management approaches reviewed and adapted as a result of ICAR interventions.	<b>A – Meets expectation</b> 4 approaches reviewed and adapted, against a target of four. These include; For ZAECA - Performance Dashboard, internal Training capabilities; ZDPP - Advocate Training, implementation of SOPs
3.2	Number of inter-agency interventions launched.	<b>B – Moderately did not meet expectation</b> 1 inter-agency intervention vs target of 2. The capacity for improved inter-agency working will be significantly enhanced with the delivery of the TOCTF facility being delivered by the BSAAT project which will enhance capacity to develop performance in this area.

**Briefly describe the output's activities and provide supporting narrative for the score.**

This output is intended to have reach beyond the technical capacity of prosecutions and investigations addressed in outputs 1 & 2, to support the development of the institutional capabilities of each partner organisation. The programme has met expectation in one indicator, and moderately failed to meet expectation in the other, leading to an overall score of **A – met expectations**.

Activity delivered includes:

- Introduction of a Performance Dashboard within ZAECA, which contains key management data allowing the DG to make informed decisions and to manage performance. It also captures critical data in support of the organisational response to FATF grey listing. In its initial iteration it is a paper-based tool, but progressive for the institution, nevertheless. There are synergies that can be harnessed with the BSAAT programme and their Dashboard App.
- Introduction and development of ZAECA Training Unit: This includes a dedicated training team to administer training records, devise and deliver training courses, and in time, develop its own prospectus.
- The ZDPP have changed their learning approach to advocacy skills, adopting internationally recognised approaches.
- Implementation into ZDPP of SOPs adopting tools for casework management, advice, decision making and accountability.

Only one inter-agency initiative has been launched against a milestone of two. However, moving forward, a clear opportunity to improve this activity manifests itself in the ZTOCTF multi-agency operational hub, delivering a cross-agency response to anti-corruption through co-location of its agents. This BSAAT project was due to complete renovation of the hub at the end of December 2022. However, a risk has emerged for BSAAT in which the GNU has failed to pay contractors on time, resulting in the suspension of works. Pledges have been made at ministerial level to pay invoices. ICAR's investigations technical advisor is closely engaged with BSAAT representatives in this project, with ZDPP and ZAECA

deploying agents and prosecutors to the initiative. This will be a significant step towards inter-agency cooperation and represents a co-ordinated cross-agency approach.

### **Lessons learned this year and recommendations for the year ahead**

Tanzania's operational response to FATF grey listing will require a consistent, coordinated, and equitable approach to tackling anti-corruption and economic crime across the whole of the Union, and there is a risk that the FATF focus will draw resource and focus away from the SDC programme.

Zanzibar's anti-corruption capacity is weaker than that of the anti-corruption actors on the mainland, and therefore Zanzibar represents a potential weakness in the Union's response. FATF presents an opportunity to strengthen the inter-agency co-operation across the whole of the Union, which is the intention of this output, but SDC's impact is in Zanzibar only.

As previously stated, the governance model for this programme does not have the reach and influence into state institutions such as State House that it requires to contribute towards the FATF response, BSAAT does. The ICAR model, while delivering impressive results, delivers technical capacity into individual institutions that are parts of a wider external 'system', rather than developing the system itself. The BSAAT programme is developing the wider anti-corruption 'system'. This provides a significant opportunity to collaborate on the anti-corruption mandate.

Recommendation for Output 3:

1. **Use FATF to leverage the synergies of both programmes, cross-agency cooperation and enhance SDC's political influence in GoT and GNU:** The reviewers recommend that SDC and BSAAT's programmes are moved closer together through formal alignment to provide consistent programming and governance structures, develop consistent standards, practises, and procedures across all the Union's anti-corruption actors. Using BSAAT's influence in government, and SDC's reach into Zanzibar, demand-side programming, and technical capacities the contributions of both programmes can be synergised into a key contributor delivering inter-agency coordination to FATF response.

## **D: VALUE FOR MONEY**

The concept of Value for Money (VfM) used in this report means making the best possible use of all our resources to maximise impact. Though it is difficult to quantify the benefits of this programme due to the relative qualitative nature of the outputs, nevertheless this analysis focuses on how the cost variables can be minimised and the output maximised. Using the 4E's approach to highlight areas where the programme has demonstrated Economy, Efficiency, Effectiveness and Equity, while also using the provided metrics to indicate shortcomings and opportunities for improvements.

Based on the FCDO methodology adopted for this review, VfM does not always mean cheaper; but can be achieved where resources are managed adequately to maximise the impact of the programme outputs.

There are many variables in this programme, for example, people trained, reports generated, cases sent to court. The review team's methodology was not to cost each of the variables in a bid to determine VfM but to look at the holistic VfM of the programme as a result of the consolidation of all the variables. The methodology focused on four key areas:

- a. Economy – whether the cost drivers are meaningful, not bloated and could be reasonably reduced without affecting quality.
- b. Efficiency – whether the inputs of resources generated a greater output.
- c. Effectiveness – whether the programme is generating outputs as planned and how each section consolidates on others to maximise output.
- d. Equity – whether the programme delivery is spread across several areas and not overlooking, depriving, or discriminating against any known related group.

### Output 1

Key cost drivers were salaries for consultants and operational costs such as travel and hotel fees as well as *per diems*. The *per diem* costs provides significant economy because the costs per unit (CPU) are pegged on government rates. The programme needs to seek alternative ways to reduce operational costs such as the use of government buildings for trainings, for instance ZAECA HQ and not expensive private conference facilities, which will further deliver on economy.

A total of 131 trainees successfully completed the investigations training course, and are now able to develop investigation strategies, prioritise cases, manage exhibits and supervise cases. Although this does not achieve the 180 milestone, there was significant challenge in achieving this in the absence of PCCB trainees, this demonstrates moderate efficiency.

Because of the training, weekly reports are now being generated with awareness of case priority and subsequently 11 cases have been sent to court which demonstrates effectiveness. The continued increase in working relationship between PCCB and ZAECA show promise and signs of equity, though more tangible evidence of the collaboration's benefit in the future is required.

### Output 2

The provision of training is still a major part of this output therefore the major cost drivers revolve around operational costs such as travel and hotel fees. Increased efforts in future will be required to find cheaper alternatives to reduce these costs to maximise economy. The delivery of 5 tools to strengthen partner agency's ability to prosecute complex cases demonstrates efficiency as these will result in reduced delays in the provision of prosecutorial opinions and improve casework integrity. However, the withdrawal of live casework support in PCCB has limited the effectiveness of this output, despite the commendable adaption the programme has shown to reach out to wider actors in the Zanzibar anti-corruption space. The VfM of the training will be greatly increased if supported by mentoring, or other effective form of accessing data from PCCB, such as aligning with the BSAAT programme to access their PCCB data.

### Output 3

This output is similar to those of outputs 1 and 2 in terms of CPU variables, so increasing efforts to reduce operational costs with the aim to maximise economy should be a priority moving forward. Though at the early stages of delivery, there are already signs of closer relationships among ZDPP, ZAECA, and ZDCEA, especially in their involvement with the development of the BSAAT-led ZTOCTF. As this progresses there will be clearer delivery of efficiency and effectiveness to justify VfM in future.

### Conclusion

Over the review period, with the current logframe (2022 logframe), early as it is in its delivery timeframe, the review team considered that VfM is being attained. However, further VfM can be attained through the implementation of the recommendations contained within this report.

The ICAR component of the ACS programme has trained 131 people, delivered several tools to strengthen partner agencies to prosecute complex cases, and fostered closer working relationships between those in the anti-corruption chain, particularly on Zanzibar. The reviewers noted that details of attendance were being retained by the ICAR technical advisors and were provided reassurance that the only persons that had attended more than one session on any one topic were those that were subject to Train-the-Trainer sessions. It is unclear what proportion of those receiving training remained in role, and whether individuals' performance had improved, but once again, the current logframe delivery is early in its lifecycle. Recommendations made previously in this report suggest that subsequent milestones in relation to training delivery should move away from quantitative training delivery to qualitative assessments gathering M&E data. Such milestones will assist in the assessment of VfM as the programme continues to build capacity in the beneficiary institutions.

Delivery to PCCB nevertheless continues to be a challenging endeavour, not least due to the difficulties in carrying out M&E activities through ICAR's model of embedded observation, and PCCB's reluctance

to release relevant data. There have been some indications that PCCB's position on the release of data to ICAR may be improving, which will assist in M&E processes and a more informed position on sustained improvement and VfM. Currently however, BSAAT's current access to PCCB data provides the best opportunity to assess the benefits of providing training to PCCB. If alignment cannot be progressed, and M&E is not made available to ICAR, SDC should consider withdrawing from the provision of training to PCCB and focus on building the capacity of those organisations that are prepared to engage.

Notwithstanding this, the programme is demonstrating evidence of increased operational delivery, impact, and VfM. In comparison to similar programmes, the ICAR component has relatively high project costs but was also able to achieve higher effectiveness and efficiency levels. It has the potential to reduce its CPU with appropriate scrutiny of costs and the use of more modest training venues in the future.

## **E: RISK**

### **Overview of risk management**

An assessment of risk was carried out at a programme level and recorded in a Risk Assessment Matrix in SDC's Credit Proposal for Phase 2 of the project. It is reproduced at Annex II for reference. This is dated in February 2020, and pre-dates all the external factors that have befallen the programme. It was drafted at a time when the PCCB were the sole focus of the programme, and the stated risks reflect this. Most of these recorded risks have either changed, or become realised, or focus on the PCCB as an institution.

ICAR's approach to risk management is led by the ICAR's Head of Programmes, and Programme Officer, who are responsible for ensuring that programme delivery is on track and that any emerging risks and issues are addressed promptly with minimal disruption to programme delivery. Risk is a standing agenda item on all programmatic meetings; risks are '...formally communicated within our biannual reports to SDC'<sup>4</sup> and subject of discussions in bi-weekly Technical Advisor meetings within ICAR. The fact is that the risks communicated in the biannual reports are operational-level risks<sup>5</sup>.

ICAR's approach to managing risk does not represent a clear record of the contextual and programmatic risks. ICAR do not maintain a separate quantified risk register for the programme, a single programmatic resource that should act as the central 'go-to' repository for risk documentation. ICAR maintain an active and ongoing dialogue with SDC on programmatic risk through regular coordination meetings, but the review team question whether this is sufficient.

The review team feel that the absence of a risk register and the current arrangements for managing and recording risk are not sufficiently documented as an auditable record. Risks should be formalised and recorded in an accessible document and used as the single repository to keep track of established and emerging risks at all levels, their assessed level of risk, the risk treatment, owners of the risk and any mitigation plans that exist. This facilitates a 'single-truth' for clarity and accountability.

The reviewers noted that some of the excellent collaborative capacity-building work between ICAR and BSAAT technical representatives on Zanzibar treads a thin line between the delivering capacity-building and providing operational assistance. Any venture into the operational assistance space is likely to lead to the engagement of Human Rights and International Humanitarian Law risks that may have impact on reputational or political risks for SDC, de facto the Swiss Government. The review team did not see clear evidence that such risks were considered, mitigated nor documented. The absence of local project management capacity is also unhelpful in this context. Such capability can provide useful checks and balances to delivery activity by offering an alternative perspective and a moderating voice on behalf of Basel and SDC, identifying and mitigating risks.

<sup>4</sup> Page 12, 'Support to the Anti-corruption Chain: Proposed Amendments', May 2022, Basel Institute of Governance

<sup>5</sup> Risks that are associated with the operational delivery of the programme, not to be confused with the risk of operations carried out by the beneficiary agency.

The absence of a risk register meant that the review team was unable to review current risks; the current contextual, strategic programmatic and operational risks cannot be considered collectively. Several risks exist over and above the original programme proposal, a programme that has changed significantly since then in terms of context, environment, and delivery. They should be considered, and a record made of that consideration. Key new risks for consideration include:

- FATF Grey listing.
- Absence of local programme management.
- Departure of prosecutions expertise.
- Political changes.
- Bureaucratic processes inhibit small equipment or infrastructure procurement to support embedding of technical skills/processes.
- While excellent cooperation with the BSAAT programme exists, the two programmes are delivering development within the same space. Without ongoing co-ordination and cooperation between the two programmes, there is a risk that contribution, messaging, and advice from the two programmes can overlap and conflict. It is vital for such messaging to remain complimentary and consistent.

Recommendation:

1. **Manage the risks:** Programme and operational risks should be formalised into a single programmatic risk register to keep track of established and emerging risks at all levels, their assessed level of risk, the risk owner, appetite, treatment, and any mitigation plans that exist. It should be reviewed regularly and kept updated.

Review Team:

Dylan Butcher  
Darrin Tomkins  
Joseph Olaoye

## ANNEX I – MID-TERM REVIEW RECOMMENDATIONS

	Recommendation	Person Responsible	Timeline
1	<b>Merge the SDC programme with BSAAT:</b> Creating greater alignment to the BSAAT programme should be sought to create synergistic effects. An options paper based on three different levels of collaboration should be produced. The options should include providing SDC with membership of the BSAAT steering committee to afford them greater political leverage. Use SDC's demand side programming to give BSAAT equilibrium and greater citizen focus on the mainland and seek partnerships on Zanzibar to extend reach to that side of the programme. Link the two programmes through the dashboard to communicate success, within both governments and improve public accountability.	SDC/BSAAT	June 2023
2	<b>Build political influence and leverage:</b> As a contingency for being unable to merge with BSAAT, SDC should take steps to revise governance arrangements and the programme steering committee structure so that it mirrors the arrangements held by BSAAT to secure political buy-in and leverage. Specifically, it should introduce a Programme Development Team (PDT) led by technical experts with experience and influence into Zanzibar's State House. The steering committee should report into State House as a mechanism of governance. Additionally, SDC should negotiate with BSAAT to secure a seat onto the mainland's steering committee, thereby gaining access to PCCB's performance through reporting mechanisms into State House. Not doing so risks the FATF focus diverting partner agency attention away from the SDC contribution.	SDC	June 2023
3	<b>Get better at measuring success:</b> SDC and ICAR should review and refine the logframe indicators and milestones for 2023 and 2024 to consider: <ul style="list-style-type: none"> <li>a. Impact: indicators and milestones to measure how the programme has impacted on its external environment;</li> <li>b. Outcome: The indicator and milestones should include an additional element that measures partner agencies' increasing capacity to <i>independently</i> apply tools/processes over the duration of the programme.</li> <li>c. Outputs: Remove cumulative indicators, provide annual milestones, and have increasingly challenging milestones during the remainder of the programme. The qualitative indicators should also seek testimonials from dependant stakeholders in the anti-corruption CJ chain.</li> </ul>	ICAR	March 2023
4	<b>Refocus the ZAECA dashboard:</b> The current dashboard should refocus on outputs and outcome in building anti-corruption capacity of all partner agencies in the programme. It should exploit the work undertaken by BSAAT and emulate the Dashboard	ICAR Technical Advisor	June 2023

	App developed by them. It should provide greater performance management of the partner agencies, with potential to measure resource efficiency. This could be used to feed performance into government entities and use the focus of FATF to drive further results, and potentially influence public perception. This in-turn should drive external accountability on the GNU and collaborate with the demand side programme to do so.		
5	<b>Make Civil Society's voice heard further:</b> as asserted by Zanzibar's PEA, a blended approach of Demand- and Supply-side activity is more likely to yield results than by any single approach. The excellent demand-side activity on the mainland should be extended to Zanzibar by fostering operational alliances with key Zanzibar actors to extend reach onto the island, replicate the mainland work and complement the technical capacity building activity to achieve synergistic results in increasing public accountability of Zanzibar's institutions.	SDC	June 2023
6	<b>Recruit Prosecutions Technical Advisor:</b> The ICAR model and its core value-added is predicated on the provision of technical and case-work advice working on the inside of an organisation. Although the Investigations Technical Advisor is endeavouring to cover this output, a Prosecutions Advisor should be recruited at the earliest opportunity. This is the most embryonic of the outputs and needs attention at the earliest opportunity to avoid loss of focus.	ICAR	Immediately
7	<b>Encourage innovation:</b> From within the current budget, introduce a 'Challenge Fund' that enables the technical advisors and partner agencies to bid for equipment and infrastructure needs, within strict criteria, for authorisation within short decision-making timeframes. This will encourage swift, innovative, and sustainable resolutions for problems as they arise, without unnecessary bureaucratic delay. Criteria will need to be set by ICAR, but suggest they focus on sustainable solutions with appropriate consideration of risk, that do not venture into the operational space.	ICAR-SDC	February 2023
8	<b>Use FATF to leverage the synergies of both programmes, cross-agency cooperation and enhance SDC's political influence in GoT and GNU:</b> The reviewers recommend that the SDC and BSAAT's programmes are moved closer together through formal alignment to provide consistent programming and governance structures, develop consistent standards, practises, and procedures across all the Union's anti-corruption actors. Using BSAAT's influence in government, SDC's reach into Zanzibar, the demand-side programming, and technical capacities the contributions of both programmes can be synergised into a key contributor delivering inter-agency coordination to FATF response.	SDC/BSAAT	July 2023
9	<b>Manage the risks:</b> Programme and operational risks should be formalised into a single programmatic risk	ICAR	February 2023



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	register to keep track of established and emerging risks at all levels, their assessed level of risk, the risk owner, appetite, treatment, and any mitigation plans that exist. It should be regularly reviewed and kept updated.		
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**ANNEX II – RISK ASSESSMENT MATRIX: Credit proposal – 20/2/20**

<b>Main identified risks</b>	<b>Probability</b>	<b>Impact</b>	<b>Mitigating measures</b>
<b>1. Contextual risks</b>			
While perceived corruption has decreased, actual corruption levels stay the same.	M	H	Monitoring of the situation through regular review of available data. Intensified policy dialogue.
Government does not prioritize and co-ordinate the various national anti-corruption strategies.	H	M	Close coordination with relevant stakeholders, including other DPs
Fight against corruption instrumentalised to target political opponents. As a result, law enforcement commits human rights violations, and by supporting PCCB, SDC becomes an accomplice to such abuses.	M	H	Due to increasingly authoritarian context, SDC should reevaluate its support to PCCB on a regular basis and decide where to draw the line.
Lack of coordination among government agencies in the anti-corruption chain persists, affecting investigation procedures.	H	M	Ensuring participation of all relevant actors in cases; increased participation of key personnel of other agencies in trainings.
<b>2. Programmatic risks</b>			
ICAR technical support does not respond to the needs of the PCCB	L	H	Two ICAR experts are directly embedded in the PCCB offices. Regular Steering Meetings will ensure buy-in.
ICAR experts don't get sufficient access to case files and investigators	M	H	ICAR will nurture its reputation of trusted and reliable partner and maintain a close dialogue with the PCCB management.
ICAR loses trust because of (perceived) indiscretion.	L	H	SDC will maintain a healthy distance from ICAR experts to avoid them being perceived as informants for a foreign government.
Insufficient or unpredictable financing of PCCB.	M	H	Helping PCCB to prioritize activities and increase efficiencies is one of the objectives of the ICAR support.
PCCB personnel that goes through training transfers to other government institutions.	M	H	Strategic selection of staff members who undergo training.
ICAR gets insufficient access to relevant data, making training and other support less efficient.	H	M	Include activities that stress the importance of data for effective steering of PCCB activities.
The move to Dodoma of key PCCB counterparts renders technical assistance ineffective.	H	M	ICAR experts are prepared to spend significant amount of time in Dodoma and contingency plan for move to Dodoma is included in the budget.

Lack of institutional data from PCCB makes tracking of progress difficult.	H	M	Increase policy dialogue around the importance of producing timely and accurate data to effectively fight corruption.
<b>3. Institutional risks</b>			
PCCB is implicated in Human Rights abuses.	M	H	Dialogues at political level to address issues of due process. Define “red line” that will end SDC support to PCCB.
Inadequate implementation discredits SDC.	L	M	Permanent dialogue and systematic monitoring will minimize this risk.

