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EVALUATION REPORT



**UDF-MOL-11-469 - Civil Society to Monitor and Contribute to Transparency and
Anti-Corruption Policies in Moldova**

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All photographs used in the report were provided by EEF.

Disclaimer

The views expressed in this report are those of the evaluators. They do not represent those of UNDEF or of any of the institutions referred to in the report.

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I. EXECUTIVE SUMMARY

(i) Project data

The project, *Civil Society to Monitor and Contribute to Transparency and Anti-Corruption Policies in Moldova*, implemented by the Chisinau-based NGO, the East Europe Foundation (EEF), took place between 1 December 2012 and January 31, 2015 (including a two-month no-cost extension). The total grant was \$200,000. The project was implemented by EEF, in close partnership with the Anti-Corruption Alliance (an NGO network). However, the Foundation retained full professional, managerial and budgetary control, and hence, in practice, had no implementing partners.

The grantee, EEF, is a well-established non-government organization, which was formed in 1998 by the US-based Eurasia Foundation as its representative office in Moldova. It began operations as an autonomous, Moldovan organization in 2010, with all staff, programs and funding transferred from the representative office. Its annual budget in recent years has averaged \$US 2 million.

The centrality of corruption is a fundamental deficiency of governance in Moldova. Within this context, the grantee defined the project objective as: *to increase civil society and media engagement against corruption, enabling them to act as strong watchdogs and major contributors to anti-corruption policy in Moldova*. In pursuit of this overall development objective, EEF sought to pursue three outcomes:

- i) Building an effective network of CSOs engaged in anti-corruption activities to ensure coordinated public oversight and efficient implementation of the National Anti-Corruption Strategy (NACS);
- ii) Increased efforts by local civil society actors and local media to prevent corruption,
- iii) Consolidated and institutionalized cooperation between the anti-corruption agencies and civil society.

Through earlier initiatives, EEF had facilitated the establishment of the Anti-Corruption Alliance (ACA) as an umbrella organization for concerned civil society organizations. The UNDEF project was designed to build on this earlier work,

(ii) Evaluation findings

Relevance: The project sought to contribute to efforts to combat the central problem of corruption as a barrier to effective governance by focusing on the strengthening of civil society and enabling it to become an active participant in the shaping of public policy on the subject. In this respect, particularly given the lack of commitment by the country's political leadership to tackling corruption, along with the general weakness of civil society, the project was certainly relevant. The core of the project was the building of the capacity and reach of the Anti-Corruption Alliance (ACA) and its member organizations.

The strategy adopted by the grantee, the East Europe Foundation (EEF), was judged to be appropriate in light of the context, as well as of the immediate needs of the civil society

beneficiaries. Risks were clearly identified and efforts to make adjustments to project plans in the face of unexpected developments (though these were few) were realistic and well-informed.

Effectiveness: The project made a strong contribution in working towards all three outcomes. First, it supported the more effective functioning of ACA as a network, ensuring that all members, including those from outside Chisinau, were able to participate. Through intensive training, ongoing coaching and financial assistance with small sub-projects, the project also offered valuable support in building the knowledge and practical skills of smaller NGOs, both members and non-members, in the anti-corruption field.

EEF was particularly successful in its drive to strengthen and expand mechanisms for regular engagement between ACA and senior officials of public institutions. At the same time, project support for the preparation and dissemination of policy papers and petitions reinforced the position of the Alliance as a contributor to public dialogue on key issues. Its public visibility and credibility was also enhanced by EEF's shrewd focus on ensuring national, regional and local media coverage for all activities.

One output, worthy of note in demonstrating the kind of contribution which civil society might make to public policy, concerned the preparation and publication of three monitoring reports on progress made between late 2012 and December 2014 on the implementation of the government's National Anti-Corruption Strategy (NACS). The reports made a difference by facilitating more comprehensive, precise and reliable reporting on the progress made during the reporting period by the 36 state institutions responsible for implementation of the Strategy. It also encouraged and produced improved performance in achieving the benchmarks set out in the official Action Plan.

The project supported two funding programs with awards for small sub-projects made on a competitive basis. The first of these, the Small Grants scheme, provided awards to eight organizations at local level throughout Moldova. This initiative stands out as a well-planned and effective component of the project's capacity development work. The second program, the National Campaign initiative, was less successful. Despite a national proposal call, there were only three applicants, all of which were selected. One, the most qualified, withdrew at the last minute, leaving two grantees to continue. The two projects had limited results, though both were notable for innovative thinking and identification of possibilities for future work. Disappointingly, neither EEF nor the Alliance took the initiative to build on what might be learned from the ten sub-projects and ten organizations supported under the two programs in providing guidance to future activities. An opportunity to share experience was lost, and this amounts to one of the project's few weaknesses.

Efficiency: In the judgment of the evaluators and of all project participants, stakeholders and observers interviewed, the organization and management of the project was exemplary. The budget was deployed carefully in balancing the competing requirements of the various project components, and managed with great care. Neither the Alliance, nor any of its core members, had experience in management of projects of this scope, and, accordingly, the decision by EEF to centralize managerial and financial control was both appropriate and widely-supported. Overall, it may be concluded that the project stands out as providing a very good return on UNDEF's investment.

Impact: The essential contribution of the project was to re-establish the Alliance, to energize it and to bring it to greater public prominence. In addition, it strengthened the capabilities of a number of NGOs to take practical action in addressing corruption issues and building public awareness of the consequences of apathy in the face of corruption, both at high levels and in the transactions of daily life. Overall, the project ensured that civil society, through the ACA, had established a secure position as a valued contributor to public dialogue concerning anti-corruption legislation and policy and in monitoring implementation.

Sustainability: With the completion of the project, the Alliance continues to operate, though at a reduced level. For now, EEF has been able to provide the Alliance with modest, short-term support from its core funding, with the hope that it will succeed in obtaining additional international support to enable ACA to continue its work as before. In the absence of such support, it is unlikely that the alliance, per se, will survive, although core member organizations, which have their own sources of funding and core programs, will maintain their activities.

(iii) Conclusions

- The project strategy for strengthening the Anti-Corruption Alliance (ACA) as a network, building the capacity of smaller and less-experienced NGOs engaging in anti-corruption work, and facilitating a more visible public presence in the public policy sphere for the Alliance, was well-defined, representing an effective response to the development problem described.

- The project met the test of relevance by focusing on a core problem in Moldovan public life of both high-level and petty corruption, while also working to nurture the development of civil society in light of an appreciation of its current weaknesses and limitations.

- The project did well in achieving the three outcomes set by the grantee in strengthening the organization of ACA, while also enhancing the quality and extensiveness of its work in advocacy and public dialogue with government. Its consistent attention to ensuring that attention was paid by the mass media to all aspects of the project greatly enhanced the public visibility of the Alliance and its work. Further, EEF was extremely successful in leveraging new openings for Alliance advocacy with senior government decision-makers.

- A centrepiece of EEF's efforts to build the capacity of smaller NGOs (both members and non-members of ACA) was the small grants program. By providing preliminary training and financial and advisory support to eight organizations, the project assisted in enhancing their skills in project design and implementation, while also contributing to their self-confidence in undertaking advocacy with local government. The project's initiative in providing assistance to the mass media through training and support to local and national coverage of corruption-related topics facilitated an increase in media coverage of corruption-related topics

- The project component focusing on providing grants for national anti-corruption campaigns was less successful than the small grants program. Despite this, the two sub-projects which were completed were innovative, providing signposts to possible future activities which might yield stronger results.

- One limitation of the project's effectiveness lay in the failure to provide an opportunity for ACA members to jointly consider the experience and lessons of the small grants and national campaign programs. Some valuable ideas and approaches to local level anti-

corruption work were piloted in the course of the sub-projects, and many of these could be considered as the basis for future initiatives undertaken under Alliance auspices.

- All members of the Alliance gained from the greater prominence for its work and the higher profile with government it gained through the efforts of the project. However, there was a gap between the smaller and less-established members and the core set of better-resourced organizations. For its long-term viability, the network will be well-advised to seek to close this gap. What the Alliance lacks at present is an interest in devising national-level activities, beyond the capabilities of any individual member, which can engage local CSOs, as well as the core of well-established NGOs.

- EEF was quite successful in assisting the Alliance to build stronger foundations in securing its place in the most important forums where it might engage at a high level with representatives of public institutions.

- One of the vehicles through which the project demonstrated the positive role which might be played by civil society in prevention of corruption was the preparation of three monitoring reports on progress made in implementation of the National Anti-Corruption Strategy. The reports revealed the lack of attention given to implementation by most of the 36 state ministries and agencies responsible for fulfilling different priorities under the Action Plan. By the end of the project, and the publication of the third report, the quality of formal reporting had improved substantially, as had the overall performance of the state agencies in fulfilling their responsibilities.

- The project supported two international study visits for members of the ACA: one to Romania and one to Georgia. Both activities were well-planned and effective.

- The project was rated very highly for its efficiency and professionalism in the management of operations and its stewardship of the budget.

- In the next few years, high-level external pressures, most notably from the EU, are likely to prod Moldova in the direction of more deep-seated reform. The achievements of the project in ensuring that civil society is now well-positioned with regard to the institutional framework for anti-corruption will enable it to play a significant role in the shaping of legislation and policy, and to monitor implementation, in the future.

- In the short and medium term, the continuation of international funding will be essential to enable the Alliance to sustain the gains it has made through the project.

(iv) Recommendations

It is recommended that:

- EEF and ACA continue to work together to support the development of the capacity of smaller and less-experienced CSOs, while also providing guidance in the development of initiatives focused on issues in anti-corruption at local and district government levels throughout Moldova (based on Conclusions, ii, iii, v and viii)

- Given that it succeeds in obtaining additional international funding, ACA devotes greater attention to developing joint activities in areas which are beyond the capabilities of individual members to organize and deliver (based on Conclusions iii, viii and ix).

- In project design, EEF give greater attention to “closing the circle”, ensuring that there are opportunities for a sharing of experience and a joint learning of lessons by organizations which have taken part in parallel activities of a similar kind, and for building on this shared experience (based on Conclusion viii).

I. INTRODUCTION AND DEVELOPMENT CONTEXT

The project, *Civil Society to Monitor and Contribute to Transparency and Anti-Corruption Policies in Moldova*, implemented by the Chisinau-based NGO, the East Europe Foundation (EEF), took place between 1 December, 2012 and January 31, 2015 (including a two-month no-cost extension). The total grant was \$200,000, including \$20,000 for UNDEF monitoring and evaluation.

The grantee, EEF, is a well-established non-government organization, which has established a significant place for itself in civil society in Moldova. It was formed in 1998 by the US-based Eurasia Foundation as its representative office in Moldova. It began operations as an autonomous, Moldovan organization in 2010, with all staff, programs and funding transferred from the representative office. EEF received its last grant from the Eurasia Foundation in 2013.¹ It continues to receive project-by-project funding from USAID, via its contractors, as well as from the EU, the Organization for Security and Cooperation in Europe (OSCE) and UN Women, among others, but its core support is now provided by Sweden (SIDA) and Denmark (DANIDA). Its annual budget is around \$US 2 million. Judging by information provided on its website, it has a staff of around 20, a majority of whom are women, and is governed by a Board of Directors, including representatives from the Eurasia Foundation. It has a substantial track record of project implementation in the civil society, media, youth engagement, and elections fields.²

The centrality of corruption as a fundamental deficiency of governance in Moldova, along with the general weakness of provisions for accountability of government, provided a strong argument for the value of a project which sought to build civil society and media capacity to monitor government, with a focus on the local government level, where the presence of civil society has been weakest, as well as at the national level. EEF took the adoption in 2011 by the Parliament of the National Anti-Corruption Strategy (NACS) 2011-2015, which foresaw a key role for civil society groups and the media, as providing an opening for the project, which sought to address the inertia and lack of a capacity of both civil society and the media in addressing and monitoring corruption.

In its problem analysis, set out in the Project Document, EEF highlighted a short list of core issues which it sought to address through the project:

- The absence of a solid civil society platform for addressing corruption and the need to address major gaps in the capacity of individual civil society organizations, enabling them to contribute effectively in monitoring the effectiveness of the implementation of anti-corruption policies and programs by local authorities, and to identify cases of corruption;
- The weakness of media capacity in investigative reporting and organizing advocacy campaigns; and,
- Poorly developed relationships among public agencies and civil society in coordination of anti-corruption efforts.

¹ Information provided through interviews conducted for the evaluation with EEF management.

² <http://www.eef.md/index.php?pag=page&id=957&l=en>

Accordingly, the **Project Strategy** defined its objective as: *to increase civil society and media engagement against corruption, enabling them to act as strong watchdogs and major contributors to anti-corruption policy in Moldova.*

This evaluation belongs to a larger set of evaluations of UNDEF-funded projects from Rounds 2 to 7. The purpose of these evaluations is to “contribute to a better understanding of what constitutes a successful project, which will in turn help UNDEF to develop future project strategies. Evaluations are also to assist stakeholders to determine whether projects have been implemented in accordance with the project document and whether anticipated project outputs have been achieved”.³

(i) Evaluation methodology

Planning for the overall evaluation and the field mission to Moldova was straightforward. An initial plan was developed by the international consultant, based on a preliminary review of project documents, and through consultations with his national counterpart. The plan was then refined, and details of the mission elaborated, through discussions between the two consultants by telephone and through detailed exchanges between the national consultant and the grantee. Final plans and logistical details were confirmed by the consultants in an initial meeting in Chisinau on Sunday, May 17.

The field mission proper took place between May 18 and 22, 2015. In order to meet a wide and representative range of project participants and stakeholders, it was agreed that the evaluation team would spend the first two full days in conducting interviews in Chisinau, starting with a full morning devoted to an overview discussion with managers at the East Europe Foundation (EEF). The following two days were devoted to field visits to meet with representatives of partner NGOs and other participants, first, in the north of Moldova in Balti and Rezina, and, second, in the south, with meetings conducted in Comrat and Cahul. In the course of the two days of meetings and interviews away from Chisinau, the evaluation team had the opportunity to meet with four of the eight organizations which had received small grants through the project. A meeting was held with a fifth of the eight organizations in Chisinau.

The mission concluded with a morning debriefing meeting at EEF on the morning of Friday, May 22, where the consultants provided feedback on their preliminary findings, and sought clarification on some issues which had arisen in the course of the interview program. The two consultants then held a final review discussion and agreed on next steps, before the international consultant departed. The team continued to exchange ideas on project issues by email on completion of the field mission.

As for many UNDEF projects - and quite understandably - very little of the project's documentation is available in English. This makes interviews and small group discussions the central source of evaluation data. Core project documents were well-written and complete. The national consultant reviewed some of the other materials in Romanian (the national language), making some selected translations, and also scanned some video materials, to provide additional input. A viewing of photographs provided by the grantee on project activities was helpful, not only in providing a source of illustrations for this report, but also in offering the evaluators a glimpse of the range and character of participants involved in project activities

³ See: Operational Manual for the UNDEF-funded project evaluations, page 6



Key stakeholders and beneficiaries interviewed included the following:

- Members of the EEF Project Team;
- Leading Members of the Anti-Corruption Alliance (ACA) in Chisinau, including the current and past Presidents of the Alliance;
- Representatives of NGOs which implemented small grants awarded by the project, as well as one of the two organizations which received funding for modest national campaigns;
- The Director of the media company responsible for the media campaign supported by the project; the editor of a regional newspaper;
- A senior representative of the government's National Anti-Corruption Centre;
- Trainers who designed and delivered project workshops for members of the ACA and other interested NGOs;
- A few other stakeholders/participants involved in the small grant initiatives.

(ii) Development context

The project took place in the context of a country characterized by continuing political turmoil and weak institutions of governance. Yet, it is also a country which, as the annual rankings provided by Freedom House in *Nations in Transit* demonstrate, has performed far better in building a democratic order than most post-Soviet states, outside the Baltic region. Its overall ratings place it close to Georgia and above Ukraine and Armenia. As such, it is described as a *Hybrid or Transitional Regime*.⁴ In a similar vein, USAID's analysis of democracy and governance in Moldova, describes the country as a *borderline or unconsolidated democracy*.⁵

Its political system has solid foundations, despite poor performance. It is stable, despite ongoing uncertainties and a weak party system. Recent elections have been adjudged to be free and fair.⁶ However, public engagement with political life is anaemic, and the political system is vulnerable to corruption and state capture by business interests, with a weak, compromised judiciary, and close personal connections between political and business leaders. Norms and procedures in government and parliament are far from robust. There is an absence of broad agreement on core values guiding public life, and a lack of trust in public institutions. These factors, taken together, serve to undermine the prospect for consolidation of democracy in Moldova.⁷

Situated in South-East Europe, between Romania and Ukraine, Moldova is a small, relatively under-developed country with an estimated population of 3.5 million, two-thirds of whom are of

⁴ See: Freedom House, *Nations in Transit 2014: Eurasia's Rupture with Democracy*.

⁵ See: *An Analysis of the State of Democracy and Governance in Moldova*. Washington, DC: USAID, December 2012, p.8.

⁶ See: Bertelsmann Stiftung, *BTI 2014, Moldova Country Report*, p.7.

⁷ For a general analysis, see, *Ibid.* and, Freedom Houses, *Nations in Transit 2014: Moldova*.

Romanian descent, with those of Russian origin forming the largest minority, followed by Ukrainians. In terms of both its national income per capita and its ranking on the Human Development Index, Moldova stands out as the poorest country in Europe.

Most of the territory of the country consists of an area once known as Bessarabia. It was formerly part of Romania, but was annexed by the Soviet Union in 1940. The country also includes within its borders an unrecognized secessionist territory, "**Transnistria**"⁸, which unilaterally declared independence from the Moldovan Soviet Socialist Republic in 1990, prior to the formal establishment of Moldovan independence in 1991 and following the dismantling of the USSR.⁹



Moldova, Transnistria & Gagauzia

This territory had once been an autonomous region within Ukraine, but, in 1940, was joined with the former Bessarabia to make up the Moldovan Socialist Republic. The pro-Russian leadership of the breakaway region, (located along the Ukrainian border), whose population consists predominantly of Russian- and Ukrainian-speakers, wished to maintain Soviet-style governance and rejected the nationalism of the Moldovan leadership, along with the primacy given to the Moldovan (Romanian) language. Armed conflict broke out in April 1992, costing hundreds of lives. A ceasefire came into effect two months later, and Russian military peacekeepers were installed. Subsequent efforts to resolve the situation through the Organization for Security and Cooperation in Europe (OSCE), supported by the EU and US, and more recently (since 2011) by a larger bloc of stakeholders, including Russia and Ukraine,

have been unsuccessful. Moldovan NGOs are not permitted to operate in Transnistria. Consequently, no project activities took place there.

In addition to Transnistria, the territory of Moldova also includes the semi-autonomous **Gagauz Republic**. Gagauzia is the poorest region of Moldova. Ethnically Turkic, Christian Orthodox in religion, and predominantly Russian-speaking, the region was initially acquired by Russia from the Ottoman Empire in 1812, with other territory, after the Russian-Turkish War. Since the independence of Moldova from the USSR, like Transnistria, it tends to be favourable towards Russia, and shares its suspicion and distrust of the pro-Western orientation of the Moldovan

⁸ Also known as the *Pridnestrovian Moldavian Republic (PMR)*

⁹ On the Transnistrian issue, see the report prepared for the EU by Stefan Wolff: *The Transnistrian Issue: Moving Beyond the Status Quo*: EU Policy Department Study, Directorate General for External Policies of the Union, 10 2012. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224472/evidence-stefan-wolff-the-transnistrian-is

state.¹⁰ However, by contrast to the situation which emerged with regard to Transnistria, differences between the Gagauz, who make up about 4 per cent of the population of Moldova, and the Moldovan majority were settled peacefully. Following negotiations, in 1994, the Parliament of Moldova adopted the Law on the Special Legal Status of Gagauzia. It is classified as “a national-territorial autonomous unit”, and includes three cities and 23 communes (local government units).¹¹ Both Gagauzia and Transnistria are exempt from the economic sanctions that Russia has imposed on Moldova. While it was not possible for the project to support activities in Transnistria, it did operate without difficulty in Gagauzia, and the evaluators visited Comrat, the principal city in the territory.

As will already be apparent, since independence in 1991, Moldova has had a troubled history. There are persisting high levels of unemployment and a substantial foreign debt as the country has struggled to find a place for itself in the global economy in the context of the loss of protected markets in the Soviet Union for its wine and other agricultural products. With limited employment opportunities, the country has experienced persisting high levels of emigration. According to UN Moldova (*Country Analysis* 2011), it is estimated that some 40 per cent of the Moldovan working-age population is working outside the country. With a further relaxation in EU border restrictions in recent years, high levels of migration, particularly of the young and the better-educated, have persisted. In terms of both its national income per capita and its ranking on the Human Development Index, Moldova stands out as the poorest country in Europe. Remittances from Moldovans living abroad account for approximately one-third of Gross Domestic product, exceeding by far the contributions of foreign direct investment and foreign trade.¹²

Politically, the country is divided between those supporting the Communist Party and other leftist, pro-Russian groupings, on the one hand, and those allying themselves with social-democratic and liberal parties, on the other.¹³ From 2001-2009, the Communist Party was in power and efforts at democratic reform stalled. With the election of a pro-reform coalition, matters have improved subsequently and relations with the EU and US have improved.

In June 2014, Moldova signed an Association Agreement with the EU. According to the European Commission, reforms specified under the earlier EU-Moldova Action Plan (2010), many of them in the democratic governance field, had proceeded well, resulting in the readiness of the EU to sign the formal Association Agreement. However, the position in the parliament of the 3-party, pro-Western governing coalition, which took control in 2009, and which was made up of the Liberal-Democratic, Liberal and Democratic Parties, was precarious, and relations among the members of the three parties were difficult.

In the parliamentary elections of November 30, 2014, the coalition won a narrow victory. However, the tensions among the partners came to a head, with the resignation of the Liberal Party from the coalition. The two remaining parties formed a new minority government,

¹⁰ See: Luke Coffey, “Is Gagauzia next on Russia’s List?” *Al Jazeera*, 21 March 2015.

<http://www.aljazeera.com/indepth/opinion/2015/03/gagauzia-russia-list-150318052557225.html>

¹¹ See, Tony Rinna, “Moldova, the EU and the Gagauzia Issue” *New Eastern Europe*, 14 February 2014.

<http://neweasterneurope.eu/interviews/1097-moldova-the-eu-and-the-gagauzia-issue>

¹² Data on remittances quoted in *USAID*, 2012, p.8.

¹³ see: Valentina Ursu and Robert Coalson, “East or West? Divided Moldova’s Tense Election Season Comes Down to the Wire”, *Radio Free Europe/Radio Liberty*, 27 November 2014; Robert Coalson, “What’s Next for Moldova”, *Radio Free Europe/Radio Liberty*, December 2, 2014.

depending on support from the Communist Party, the largest single party in parliament, for its day-to-day survival.

The sad state of the country's divided politics revealed a political class unable to compromise and form an effective government, following the fourth parliamentary election since April 2009, and an electorate increasingly disgusted with its politicians, who are no longer trusted and seen as more concerned about their own enrichment than addressing the priorities of electors.¹⁴ The findings of national opinion polls provide further evidence of the depth of disenchantment of Moldovans with the state of their democracy and the performance of the country's institutions.¹⁵

Despite the adoption of a broad-based anti-corruption legislative and policy package in December 2013,¹⁶ Implementation remains weak, as, apparently, does the commitment of the political class, unwilling to limit its opportunities for rent-seeking. While there have been modest improvements over the past 15 years, a system of patronage and cronyism remains firmly in place.¹⁷

As Freedom House notes in the *2014 Nations in Transit Report on Moldova*, an enabling factor for political corruption has been the persistence of a political culture within which there is, as yet, no appreciation of the role of citizens and civil society in holding politicians to account. However, there are signs of improvement, with NGOs being particularly active and visible in the field of anti-corruption (see p.438). Overall, **Civil Society** remains weak, but has benefited from a favourable environment since 2009, and an increasing openness in social and political life. Similarly, the enabling environment for independent media has greatly improved. As elsewhere in the region, NGOs lack organizational capacity and infrastructure, as well as a membership base.¹⁸

Beyond this, as was noted in the EU 2014 report, like other institutions operating in the public realm, civil society organizations suffer from a lack of public confidence, and have had limited impact on public policy.¹⁹ Critically, given the focus of the UNDEF project, implemented by EEF, the EU team also noted that “*active participation in supervising the implementation of government policies and monitoring local public authorities is low.*”²⁰

¹⁴ See: Valentina Ursu and Robert Coalson, “Moldova’s Creaking Political System Could Be a Gift for Moscow”, *Radio Free Europe/Radio Liberty*, 20 February, 2015.

¹⁵ See: Institute for Public Policy, Chisinau, *Barometer of Public Opinion, March-April 2014*. In a major national survey conducted by the Institute early in 2014, it was found that 72 per cent of adults have little or no interest in politics, and that a significant majority have very little or no trust in government, Parliament, the President, the courts or political parties.

¹⁶ See: *Nations in Transit 2014: Moldova*, p.434.

¹⁷ See: *USAID 2012*, p.10.

¹⁸ See: *USAID 2012*, p.18.

¹⁹ See: European Commission, “Implementation of the European Neighbourhood Policy in the Republic of Moldova: Progress in 2013 and Recommendations for Action”, *Joint Staff Working Document (EU 2014)*, p.7; see also *Nations in Transit 2014: Moldova*, p.433.

²⁰ See: *EU 2014*, p.7.

II. PROJECT STRATEGY

i. Project strategy and approach

In support of its overall objective of seeking *to increase civil society and media engagement against corruption, enabling them to act as strong watchdogs and major contributors to anti-corruption policy in Moldova*, EEF sought to pursue three outcomes:

- i) Building an effective network of CSOs engaged in anti-corruption activities to ensure coordinated public oversight and efficient implementation of the National Anti-Corruption Strategy (NACS);
- ii) Increased efforts by local civil society actors and local media to prevent corruption;
- iii) Consolidated and institutionalized cooperation between the anti-corruption agencies and civil society.

Through earlier initiatives, EEF had facilitated the establishment of the Anti-Corruption Alliance (ACA) as an umbrella organization for concerned civil society organizations.²¹ The UNDEF project sought to build on this earlier work, further enhancing the capacities of ACA and its members, while also focusing on building up the membership of ACA and strengthening anti-corruption activities at local level. The **direct beneficiaries** of the project were: the 16 organizational members of the ACA (NGOs and think tanks, mostly based in Chisinau); selected local NGOs; and, journalists from national and regional media. It should be noted that, in designing and managing the project, EEF was able to draw on its wider experience in nurturing the establishment and strengthening of NGO networks, most notably in the elections and election monitoring sphere.

The main activities undertaken included the following:

- The organization of an initial 2-day residential strategic planning workshop (March 2013) and the drafting by ACA members of a Joint Civil Society Anti-Corruption Strategy, 2013-2015;
- Selection and recruitment of an ACA General Secretary, with the position financed by the project, to be based at the Presidency organization of the ACA;
- Holding of regular meetings of the ACA;
- A 2-day training program (March 2013) for ACA and local CSO representatives on the legal framework for anti-corruption, the institutional framework, tools for identification of corruption, and access to information;
- A 4-day study visit to Romania for 9 representatives of ACA and 2 project staff members (June 2013);
- A 4-day study visit to Georgia for the ACA leadership group and the Project Coordinator (September 2014);
- Undertaking 8 local anti-corruption initiatives, implemented by trained local CSOs and supported by small grants, awarded on a competitive basis (beginning in November 2013);

²¹ As noted in [Appendix A](#) to the Project Document, the Foundation had hosted the Alliance Secretariat between 2006 and 2010. Since 2012, the Secretariat has moved to the offices of whichever member organization hold the Presidency.

- Provision of a 2-day training course for 20 journalists from local media on investigative journalism and reporting on corruption;
- Research, preparation and dissemination of three monitoring reports on implementation of the NACS (presentation of reports on: 12 August 2013; 18 December 2013; and, 9 December 2014);
- Organization and delivery of three national anti-corruption advocacy campaigns by ACA member organizations, to be supported by small grants awarded on a competitive basis. In practice, only two grants were awarded (2014);
- Organization and implementation of a media campaign to promote transparency and prevent corruption through a contract with a national media company (the campaign took place in December 2014-January 2015, immediately following national elections); support to local media in covering activities undertaken at local level through the small grants program;
- Preparation by ACA members, on the basis of discussions at ACA meetings, of a series of position papers and petitions to public institutions.
- Organization by the grantee of eight quarterly thematic meetings for ACA with government agencies focused on corruption and transparency matters (April 2013 to December 2014).
- Holding of a Final National Conference to bring together CSOs, the media and high-level officials of government agencies (December 2014).

EEF drew on its (and its staff's) long experience in working with Moldovan civil society, as well of its corporate memory in planning and organizing donor-funded initiatives, in devising the strategy for the project.²² Most Moldovan NGOs, even in Chisinau, are small and reliant on project-by-project funding to survive. Thorough knowledge of the project's beneficiaries and their context enabled EEF to design a set of activities in which careful attention was paid to the primary and immediate needs, as well as the absorptive capacities, of NGOs, national and local. Similarly, earlier experience in establishing the ACA, as well as in working over a longer period with other NGO networks, guided EEF as it provided support to further strengthening of the ACA network. Training, the small grants program, and the judicious use of project funding to provide for local media coverage of local activities, all reflected a thoughtful approach by the grantee in providing financial support and access to new knowledge where it was most needed.



Team strategic planning

²² It should be noted that a solid track record of implementing donor-funded projects on the part of a grantee does not always translate into effective and worthwhile programming. In earlier evaluations of UNDEF projects in Afghanistan and Mozambique, conducted by the international consultant, where the grantees were local branches of international NGOs with substantial experience, results were rather disappointing. In both projects, the grantees failed to provide the continuity of support to beneficiaries, so critical to success.

First inspection of the list of activities undertaken through the project might suggest as a possible weakness in design the adoption of a “menu” approach to devising the programming plan. However, in practice, this did not prove to be the case. Ongoing engagement with beneficiaries by the project management team in all facets of programming held the project together, ensuring that each activity built on its predecessors, enhancing overall results achieved.

ii. Logical framework

The chart is based on detailed information included in the project’s framework, as set out in the Project Document, as well as the final report. Some activities are not captured well in either document. Accordingly, additions have been made to the Project Activities column, based on interviews conducted for the evaluation.

Project activities	Intended outputs/outcomes	Medium-term impacts	Long-term development objective
<p>1.1 Organization and delivery of 2-day strategic planning workshop for 25 participants (actual, 21); inputs and facilitation provided by EEF;</p>	<p>Joint civil society anti-corruption agenda drafted.</p>		
<p>1.2 Organization of 18 meetings of ACA during the project period; Recruitment & selection of ACA General Secretary</p>	<p>Regular meetings of Anti-Corruption Alliance (ACA) held to strengthen the CSO AC platform (in practice, 22 held).</p>		
<p>1.3 A 2-day training workshop organized and delivered</p>	<p>At least 25 ACA member organizations & local CSOs trained to effectively implement anti-corruption campaigns delivered (in practice, 21 rather than 25 participants took part)</p>		
<p>1.4 A 3-day study visit to Romania organized by EEF for 12 NGO representatives; meetings to be held with relevant Romanian NGOs and state agencies dealing with anti-corruption matters.</p>	<p>Study visit to Romania held to enable ACA members to identify intervention models for replication by partner NGOs (In practice, 9 ACA representatives and 2 project team members took part in a study visit which was extended to 4 days).</p>	<p>1. Establishment of an effective nationwide network of CSOs engaged in anti-corruption activities to ensure coordinated public oversight & efficient implementation of the National Anti-Corruption Strategy.</p>	
<p>1.5 *ADDED ACTIVITY which took place during project extension, utilizing funds saved elsewhere: A study visit of 4 days(+2 days travel) organized by EEF to meet relevant NGOs and state agencies engaged in anti-corruption work</p>	<p>Study Visit to Georgia for ACA Leadership and project Coordinator (in practice, 6 ACA representatives, plus the Project Coordinator, took part)</p>		

<p>2.1 A small grants scheme is developed to support those local NGOs trained under 1.3 in undertaking small projects; Proposals are developed by NGOs, and those which meet published criteria and selected by an independent expert panel are recommended for funding; EEF staff members conduct pre-award site visits to all short-listed candidate NGOs; Awards are announced and grant contracts signed, following UNDEF approval; EEF project management provides ongoing monitoring and coaching to the NGOs implementing the initiatives</p> <p>2.2 Applications for participation are disseminated widely through media networks and journalism associations. As a follow-up, the project team facilitated contacts between NGOs implementing small grant initiatives and local media from the same localities to encourage synergy and provide greater visibility to project results (see also 2.5)</p> <p>2.3 An initial request made to ACA for it to take on responsibility for researching and producing the 3 NACS monitoring reports; Subsequently. A call for proposals is organized for a writer/researcher with relevant expertise to prepare the reports; a consultant is selected to produce and present 3 reports (August 2013; December 2013; and, December 2014) Public presentations to stakeholders are organized for the first and second report; the third report is presented at the National Anti-Corruption Conference in December 2014.</p> <p>2.4 A competitive process is developed with 3 sub-grants of \$10,000 each available to national ACA members; Three grants are awarded to ACA member organizations; two campaigns are implemented</p>	<p>At least 8 Anti-corruption activities at local level are implemented by CSOs and activists</p> <p>At least 25 journalists from local media trained on reporting on corruption (In practice, 22 trainees were selected, and 20 actually took part).</p> <p>At least 3 reports on monitoring the implementation of the National Anti-Corruption Strategy (NACS) published and disseminated</p> <p>At least 3 Nation-wide anti-corruption awareness and advocacy campaigns by CSOs and media take place (In practice, one grantee withdrew at a late stage and was not replaced)</p>	<p>2. Increased efforts by local civil society actors and local media to prevent corruption.</p>	<p>To increase civil society and media engagement against corruption, enabling them to act as strong watchdogs and major contributors to anti-corruption policy in Moldova.</p>
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<p>2.5 Intended: 10 TV & radio shows to be broadcast by at least 3 regional stations; position papers (see 2.6) to be disseminated through 39 articles in print media; Content material developed for national campaign; formal and contractual arrangements made with national & local media; data collected on reach/audience & readership for media coverage</p> <p>2.6 ACA members develop position papers and petitions</p> <p><i>The petitions/position papers are adopted by ACA collectively and presented to the relevant public bodies and/or publicized.</i></p> <p>3.1 At least 8 3-hour thematic meetings of ACA to be organized with state bodies charged with the implementation of the National Anti-Corruption Strategy & Action Plan, attended by at least 20 participants.</p> <p>3.2 ACA organized quarterly meetings with senior representatives of law enforcement agencies for coordination of anti-corruption work</p> <p>3.3 A national conference is organized, facilitated by EEF, with an expected attendance of 60 state and civil society representatives</p>	<p>Media campaign is organized to promote transparency and prevent corruption <i>(In practice, a national media campaign was combined with support to local newspapers and other media: 33 articles published at national & local levels; 26 TV shows or reports on 5 regional TV stations; 14 radio shows/reports on 7 stations; 3 live TV talk shows broadcast on TV Moldova 1).</i></p> <p>ACA member NGOs, working together, will develop at least 20 position papers on current developments in preventing & combating corruption <i>(In practice, 55 official petitions & position papers were developed as ACA initiatives, or representing a broader civil society position, to which ACA contributed. At least 40 received official consideration).</i></p> <p>Quarterly thematic meetings of ACA with government agencies are held, focusing on corruption, transparency, petitioning, signaling and enforcing of anti-corruption measures <i>(In practice, 8 meetings were conducted, with strong, high-level engagement by state institutions, and an average of 20-30 participants).</i></p> <p>Bi-Annual coordination meetings held bringing together ACA and the senior leadership of law enforcement agencies <i>(In practice, combined with 3.1, since the senior leadership was involved in the 1/4ly meetings).</i></p> <p>Final National Conference held, bringing together civil society and responsible authorities <i>(In practice, a decision was made jointly with the Government's National Anti-Corruption Centre (NAC) to expand the one-day conference for Anti-Corruption Day to 3 days, with NAC, ACA, the Central Election Commission, National Institute of Justice & UNDP as partners. There were 200 participants).</i></p>	<p>3. Consolidated & institutionalized cooperation between the anti-corruption agencies & civil society.</p>	
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III. EVALUATION FINDINGS

The evaluation is based on a framework reflecting a core set of evaluation questions formulated to meet the evaluation criteria of the Development Assistance Committee of the Organization for Economic Cooperation and Development. The questions and sub-questions are listed in Annex 1 of this document.

(i) Relevance

As noted above, Corruption remains a pressing problem in Moldova, and it is apparent that there is a lack of a firm commitment on the part of government and state law enforcement institutions to address the issue head-on. Hence, the project was certainly relevant in its focus on the need to strengthen the role of civil society and the mass media in focussing their efforts in drawing public attention to corruption and its impact on daily life, while advocating for specific remedies to particular issues and aspects of the broader problem.



Meeting for the Sub-Project on Corruption in the Universities

Beyond this, a central feature of the project was its approach to building the capacity and confidence of the Anti-Corruption Alliance (ACA) and its member organizations, while bearing in mind their limited resources. There is an opportunity in Moldova for civil society to play a more central role in the public sphere. However, the prospect for Moldovan NGOs and think-tanks to take advantage of their opportunities is restricted not by constraints imposed by

the state, but by their own organizational and financial limitations and the absence of public appreciation of the potential contribution that civil society can make to public life. The project did what it could to address this state of affairs, by reinforcing the position of a fledgling national network and strengthening the organizational capacities and visibility of member NGOs.

The strategy adopted by the East Europe Foundation (EEF) was appropriate given the development context and the needs of project beneficiaries. The project also revealed the limits of what civil society can do, given current human and financial resources. None of the activists involved in the ACA network's member organizations was willing or able to take on the work of preparing the NACS monitoring reports. Further, there was very limited uptake for the small grants, or the national campaign, program. In the case of the small grants program, this seems to have reflected the fact that very few local CSOs had the capacity or the available human resources to take on the work. For the national campaign, the small number of larger, national

organizations were fully engaged in other work. Very few were well-placed to take on a national campaign, and most found the additional funding available - \$10,000 – insufficient to tempt them to try something new.

In the judgment of the evaluators, EEF demonstrated its appreciation of the limitations of civil society capacity, while also trying to nurture its further development, and also encouraging both established and new members of ACA to overcome their limitations, exposing them to new ideas and practices, and building their self-confidence. Not everything worked, but the effort was worthwhile in all cases, and the project adjusted well to minor setbacks. Risks were appropriately identified and managed realistically.

(ii) Effectiveness

The project made a strong contribution to achieving the three specified outcomes, with the proviso that – in the absence of any source of domestic funding for civil society in Moldova – none of them will be fully sustainable without continued international support. This, and the associated, persisting organizational weakness of Moldovan civil society, underscores the fragility of the gains that have been made, important though they are.

The first outcome refers to the establishment of an effective network of CSOs, dedicated to anti-corruption activities, and ensuring coordinated public oversight and effective implementation of the NACS. *The Anti-Corruption Alliance (ACA)* was first established in 2006, with the financial and logistical support of EEF, which also housed the organization’s secretariat. During the initial 4-year period, the emergent network lacked full autonomy from government, with representatives of the National Anti-Corruption Centre being present in all meetings. During the 4-year period of initial funding, the Alliance was active in formulating joint advocacy positions on anti-corruption and transparency of decision-making, contributing to the formulation of government policy.



National Anti-Corruption Conference 12 2014

Between 2010 and 2012, the Alliance lacked dedicated funding and the organization became largely inactive. However, a core group of the better-resourced organizations among the members continued to play an active role in advocacy and in pressing the government to take a stronger role in combating corruption.

With the resumption of dedicated funding between December 2012 and January 2015, this time through UNDEF project funding to EEF, the

Alliance regained the ability to engage with its broader membership. Through the project - by covering the costs of the General Secretary position, organizing general meetings (in coordination with the President and General Secretary), as well as dialogue sessions with public institutions - EEF was able to facilitate the building of a stronger foundation for the Alliance.

One of the limitations of the network, its reach and the contribution of the member organizations to advocacy and dialogue, has been the low capacity of most NGOs, particularly of those from outside the capital. EEF ensured that old and new member organizations from beyond Chisinau were able to take part in regular ACA meetings, as well as dialogue sessions with government. The small grants scheme assisted local CSOs in strengthening the effectiveness of their project work, while enhancing their visibility through local and regional media. Training provided prior to the initiation of the small grants program, along with continuing coaching and advice from the EEF project team during implementation enhanced greatly the prospect of the grantees achieving worthwhile results, while also strengthening organizational capacities and project implementation skills.

Beyond this, EEF's reputation with public institutions and the international community enabled it to establish closer links between government and ACA. Deployment of project resources to facilitate opportunities for regular engagement with senior officials of public institutions (and pay for minor meeting costs) was a vital investment in building the credibility of the Alliance in the eyes of public officials. Support for the Alliance also assisted it in the production of the policy inputs (petitions, policy papers and contributions to draft legislation), which reinforced its status, as well as its access to the policy process. Five representatives of the Alliance sat on the Monitoring Group for NACS.

A particular strength of EEF in ensuring that the project met expectations for the results set out in *Outcome 1* was its constant attention to (and effectiveness in) ensuring national, regional and local media coverage. This contribution was noted with particular appreciation by members of the Alliance. In summary, within the constraints of factors beyond its control, the project performed very strongly in reaching its goals.

Outcome 2 refers to bringing about *increased efforts by local civil society actors and local media in preventing corruption*. The grantee provided a thorough documentation of changes in the level of performance of local CSOs and local media by the conclusion of the project in comparison with the baseline (pre-project) situation. *The small grants scheme* (Output 2.1) was particularly significant in enabling the project to achieve its objectives under this outcome. Through the eight projects supported, new mechanisms or approaches to cooperation between CSOs and the local government administration were adopted in eight districts. In the media sphere, through the influence of the project and its principal media partners, the Ziarul de Garda (the only independent daily newspaper and media source in Moldova), and the Association for a Free Press, some 10 media institutions began to report on anti-corruption topics on a regular basis. Overall, the evaluators are satisfied that the project met its objectives under the second outcome.

The evaluation team was able to confirm the value of the small grants through its visits to four communities outside Chisinau, as well as one meeting in the capital. Even the least successful of the projects made a difference in strengthening cooperation and/or engagement between local CSOs and local government. Completion of the projects also contributed to an increased

capacity and/or willingness on the part of the eight grantees to continue their work in the anti-corruption sphere.

In the north of the country, in *Balti*, through its project in monitoring the procurement process by local government in surrounding districts, the *Legal Clinic*, an autonomous organization, linked to the University Law School, was able to identify problem areas at all stages of the process. While procurement at national level had been in the spotlight, there had been little attention to the way local government purchases goods and services and pays for infrastructure development, and no monitoring had taken place previously. As a result of the project, it became possible to document the features of current practice. A number of problems were identified, and, subsequently, in several districts, changes have been made by the local administration to their guidelines and procedures. Two other small grant projects are described in the text boxes below.

There was less success with *the national campaign component of the project* (Output 2.4) than with the small grants program. As noted above, there was a disappointing response to the proposal call. Initially, three grants were approved. However, Transparency International Moldova, the third grantee (and the most qualified of the three) withdrew one week prior to the launch of the initiative on the grounds of time pressures on staff. The two projects that were initiated were innovative and pointed the way to future possibilities, though both produced limited results.

The evaluation team examined one of the two, implemented by the Lawyers Union of Moldova in cooperation with four universities in different regions of the country, and focused on assessing corruption in universities. There is some similarity with the small grant project on bribery in secondary schools in Gagauzia, discussed below. The approach, in this case, was unusual, in that the small project team worked with young law lecturers in the four universities and obtained the agreement of the university administration in each case to meet

Small Grant Project 1: Steps to prevent Corruption in Local Government:

In *Rezina*, in the north of Moldova, *ADR/Habitat*, an NGO with expertise in community engagement and advocacy on issues of concern, facilitated a bringing together of local officials and community representatives in each of four districts to discuss corruption and mechanisms through which corruption might be prevented and combatted. With facilitation provided by the NGO, Groups of officials and groups of citizens met separately first to develop a consensus on current problem areas, key concerns and priority actions to be taken to address them. The two groups then came together, and feedback from both sides was recorded and discussed, with areas of agreement noted. Representatives of the National Anti-Corruption Centre also took part.

ADR/Habitat then developed a public policy proposal for preventing and combating corruption, which was sent to the four district councils, as well as the director of administration in each district. The project succeeded in putting corruption and anti-corruption measures which might be adopted on the local public agenda, while the involvement of citizens, along with coverage by local media, ensured that there would be a continued focus on the topic. A senior local administrator, interviewed by the evaluation team, indicated that local officials had learned a great deal from the project. The new information obtained included a new understanding that some current practices by mayors and other senior officials might amount to what might appear to be a conflict of interest, while also leading to at least a suspicion on the part of the public and other local stakeholders that decisions on contracts and priority-setting might be tainted by corruption.

with students without the administration being present. In this way, they were able to draw on the experience of the students in documenting problems that they faced. An informal Student Alliance was formed, and the cadre of young lecturers worked with small groups of students in developing a summary of current concerns, along with a set of guidelines presented to the university administration for their consideration.

One further output was particularly effective in demonstrating the kind of contribution that an independent civil society could bring to strengthening the implementation of public policy. *Output 2.3*, concerned the preparation and dissemination between 2012 and December 2014 of three reports, monitoring the performance by state bodies of the National Anti-Corruption Strategy (NACS). The three reports were all carefully and expertly researched and written, and each was launched at a public event.²³ They filled an important gap by shedding light on progress made in implementing the Strategy.

Initially, the formal reporting by the public agencies on implementation of the Strategy was vague and lacking in detail. By the conclusion of the project, there was a considerable improvement not only in the standard and thoroughness of reporting, but also in performance. Overall, by drawing public attention to the implementation of the government strategy, the initiative served to inject some new energy into the process, while also obliging the official NACS Monitoring Group to take its work seriously. At the first meeting of the Group, attended by the expert recruited by EEF, it quickly became apparent that members were not even reading the official government quarterly reports on progress on meeting objectives set out in the Action Plan.

Outcome 3 focused on the achievement of *consolidated and institutionalized cooperation between the anti-corruption agencies and civil society*. There is some overlap between this and the first outcome, particularly with reference to the implementation of the NACS. However, the focus is a little different. It is important, once again, to consider the context within

Small Grant Project 2: Dealing with Bribery in Secondary Schools.

Citizens in Moldova deal with corruption on a daily or weekly basis in such fields as health care and education. In *Comrat*, the principal urban community in Gagauzia, the *Institute for Democracy* developed a project to fight back against corruption in secondary school, where students were faced with demands from teachers for payment to receive the grades they needed on assignments, or for courses. One part of the project - which also involved completing a public opinion survey distributed to students, discussions, and the distribution of educational materials - involved the simple expedient of placing large notice boards or posters inside the entrance to two schools. The posters pointed out that everyone was a victim of corruption, and urged students and teachers not to engage in bribery.

With the agreement of the school administration, Along with the notice, there was placed an “anti-corruption box”, where cases of attempted or actual bribery could be reported. As a result of the introduction to the schools of the poster and “suggestion box” in a prominent place, students reported that teachers had become far more cautious in soliciting bribes. The Education Directorate of Gagauzia was a supporter of the project and has proposed extending it more broadly in the territory. However, such an initiative must await the availability of additional funding. There was substantial local media coverage of several aspects of the project, and, as a result, the issue of corruption in the schools is now receiving greater attention.

²³ Prior to their public release, each report was presented by the responsible expert to a group of ACA members. Feedback from these sessions led to adjustments to the final text.

which project activities took place. As discussed above, while the government has responded to pressure from the European Union and the World Bank, among others, to establish an institutional framework to combat and prevent corruption, there is a lack of a full-hearted commitment to implement laws and regulations, or to prosecute cases of serious corruption, while budget allocations to those agencies responsible for investigating cases of corruption are grossly inadequate.

The project was quite effective in its efforts to strengthen the position of civil society, through the Alliance, in cooperating with state bodies. Yet, at the same time, the willingness of the long list of state agencies which together have responsibility for addressing corruption (36 are included in the National Anti-Corruption Strategy Action Plan), to take decisive action is limited because of the lack of support from the national leadership level. Consequently, while the credibility of the ACA and other civil society networks, such as the all-embracing National Council for Participation, may be enhanced, under current conditions, there is little practical consequence.

Having said this, the achievement of the project in bringing the ACA closer to the centres of decision-making and ensuring that it was well-represented in mechanisms for coordination between government and non-government stakeholders, was of real value. The project facilitated the establishment of new mechanisms to institutionalize cooperation between the ACA and relevant government agencies. These accomplishments are well-summarized in the Final Report, and confirmed through interviews and document review for the evaluation. Hence, it may be concluded that the project has succeeded to the extent possible under current circumstances in realizing the results summarized under Outcome 3.



High School Students in Comrat, with Anti-Corruption Poster and Suggestion Box

It is apparent that the project was effective in implementing planned outputs. In one case, there was a merging of two parallel outputs as it became clear to management and participants alike that there was an overlap between the two (Outputs 3.1 and 3.2). This was entirely sensible. A different issue concerned the limited capacity of civil society organizations and the mass media. As noted above under **relevance**, this constraint had an impact on both the national anti-corruption campaign component of the project (Output 2.4), as well as Output 2.1, the Small Grants scheme. Similarly, for the national media campaign (output 2.5), a proposal call was

announced for a media company to produce content and arrange broadcasting of news items and short features on the project for TV and radio. There was only one applicant, and probably this was the only entity capable of meeting the terms of reference. The work was done well under tight time constraints, and the lack of competition did not cause any negative consequences for the project. However, the lack of alternatives in this sphere once again draws

attention to the underlying problem of limited capacity and experience. It also validates the focus on capacity development by learning-by-doing in the project.

One additional activity, beyond those set out in the Project Document, the Study Visit to Georgia, was added with the agreement of UNDEF, during the project extension period, utilizing funds saved elsewhere. It is not always easy to justify study visits, but in the case of both the Romania and Georgia trips, it is apparent that participants gained a great deal of usable knowledge on possible approaches, lessons learned and opportunities for civil society to demonstrate the value that it could add in the anti-corruption sphere. The selection of countries was judicious, in that both have experienced considerable success in recent decades in dealing with challenges similar to those encountered by Moldova. Both visits were planned and conducted in a highly professional way by EEF, and participants were selected carefully. The new activity represented a worthwhile addition to the project.

One area identified by the evaluators where the project could have done more was in its (and ACA's) failure to provide an opportunity for members to learn from and assess the experience of the small grants and national campaign projects. It is apparent to the evaluation team that there were some important efforts made through the sub-projects to tackle a range of issues in corruption prevention, mainly at local level. Many of the projects could be utilized as pilots to form the basis for future, more ambitious work. However, these possibilities were not considered.

(iii) Efficiency

From a review of completed activities, including interviews with principals and participants, it may be concluded that project organization was exemplary. Those who took part in training and the small grants and national campaign programs, as well as the two international study visits, commented uniformly on the attention given by EEF to detail, as well as the care given to meeting participant needs and priorities. Trainers and media specialists, along with the expert responsible for producing the three NACS monitoring reports, all commented on the relevance and precision of terms of reference provided. Finally, ACA members, from inside and outside the core group commented on the reliability of EEF's organizational and logistical support to the work of the Alliance.

Project finances were managed with great care. The project came in under budget (\$165,549.59, instead of the \$180,000 allocated for project expenditures), and yet it is apparent that more value was delivered than is accounted for by the budget. Salaries for EEF staff accounted for only \$26,400 of the original budget (14.7 per cent). Given the range and multitude of transactions in which EEF management was involved in support of the project and the limited organizational resources of the ACA Secretariat (project funding covered the costs of the general Secretary position), it is clear to the evaluators that EEF added a substantial in-kind contribution of staff time over and above that funded by UNDEF.

Project funds were deployed effectively and efficiently in support of the achievement of project outputs, with savings made where numbers of participants in activities did not meet initial expectations. Further savings were made in the costs of the rent of facilities, with the utilization of EEF space for regular ACA meetings, and the National Anti-Corruption Centre and other government agencies also hosting meetings. Further savings were made in the costs of travel

for the two study visits, as well as in media expenditures. The quality and number of media products delivered by the project was impressive, and the overall cost was relatively modest

Overall, good judgment was shown in balancing the allocation of the budget across different categories of expenditure and the different project components.



Rezina: Joint Session, Local Government Sub-Project

EEF managed the budget centrally, except for small allocations to the grantees under the small grants and national campaign programs. During the life of the project, the organizational home of the ACA Presidency changed and with it the location of the General Secretary position. Given the limited experience of ACA in managing finances and logistics, along with the organizational shift, it proved to be a sensible decision to centralize financial controls. However, it is noteworthy that, in a

small follow-up, bridging grant to ACA by EEF from its core funding, the budget has been transferred to the Presidency (currently held by the NGO, Credo) to manage.

EEF took great care in managing the process of selection and monitoring of grantees under both the small grants and national campaign schemes. An expert selection committee panel provided advice on the selection of NGO candidates to receive small grants, with members drawn from Moldovan governance and civil society specialists working with international organizations and projects, including the Soros Foundation, the Council of Europe, the American Bar Association and a USAID rule of law contractor. Minutes of meeting made available to the evaluation team demonstrate the detailed consideration given to each of the twelve applications received in the process through which the panel developed its recommendations on a short-listing of proposals. The project management team followed up with site visits to each of the nine short-listed organizations prior to finalization of project proposals. In most cases, adjustments were made to project plans on the basis of advice from the panel and/or EEF. In addition, one potential grantee withdrew following the site visit.

Each of the eight grantees was required to provide an interim report, with payment of the second trench of funding to be released only on the basis of satisfactory and on-time performance of planned activities. In the case of two of the organizations, financial support ceased at the mid-point, because of failure to achieve proposed results and complete activities planned. Despite this, and the organizational problems encountered, these two grantees were able to accomplish something worthwhile.

To sum up, the evaluation team considers that the project was managed in a highly professional manner by an organization very much committed to objectives which closely match core elements of UNDEF's mandate. The project benefited from the prior experience of EEF in designing and managing other projects with civil society and civil society networks, as well as from its capabilities in managing for, and reporting on, results. The Foundation also planned and managed the budget in a way which maximized both efficiency and effectiveness.

(iv) Impact

The most important contribution of the project in the view of the EEF team was to re-establish the Ant-Corruption Alliance, while enhancing its visibility in the eyes of senior officials representing key state agencies, the mass media and the public. Beyond this, any discussion of broader impact must answer the "so what?" question. Given the obvious lack of interest by political leaders in the contributions of civil society, it might seem that the gains reported by the project are unimportant, in that there is little measurable difference in government performance or behavior in addressing corruption. Yet, more positively, unless there is a return to power of the Communist Party (certainly a possibility, it must be acknowledged), because of the sustained pressure for reform coming from the EU and other Western partners, present gains will be consolidated and form the basis for further advances. By supporting the embedding of civil society into the architecture of anti-corruption, while enabling it to maintain its autonomy from government, the efforts of the project have helped to ensure that, in a more favourable political and policy environment, the ACA will be in a position to influence the shaping of the legislative and regulatory framework and to monitor implementation.

The project's beneficiaries, the NGO members of ACA, as well as other, smaller NGOs, which were engaged with the project through the small grants program, all gained substantially from the project. The smaller NGOs gained the most, through the project's capacity-building activities, and by learning from the knowledge and experience of others. Members of ACA's core group of 4 NGOs ("the founders") benefited less in that they all have established, professional reputations, clear and distinctive mandates, good networks of connections with public institutions and ongoing programs of activities, funded from other sources.

Certainly, they may have been "givers" to the collective membership in sharing their knowledge and expertise with others. At the same time, they also acknowledged in interviews for the evaluation that they gained from the project's facilitation of sustained, high-level dialogue with state institutions, and from access to a more powerful advocacy platform than would otherwise have been available to them. In addition, the project's success in attracting media attention brought the Alliance and its effort to combat and prevent corruption a higher public profile. All members gained from this. For the future, if the network is to grow and prosper, it will be well-advised to invest in developing joint initiatives of national scope which can engage a large number of Alliance members, and not only those based in Chisinau.

The project energized the Alliance and brought it to greater prominence. It also strengthened the capacity of a number of NGOs, many outside Chisinau, to take practical action to combat corruption and enhance public awareness of specific dimensions of the problem. In this sense, it made a positive contribution to democratization. In the absence of commitment by the political leadership and the parties represented in parliament to tackle corruption, and in the face of a largely passive public, despite its many virtues, circumstances did not permit the project to have a broader catalytic effect.

(v)Sustainability

Although the project has come to a conclusion, the Alliance continues to meet and to engage with government. However, it is now operating on very limited resources, and collective action takes place at a level of reduced intensity. The limited funding has also made it difficult for many members from outside Chisinau to participate in ACA meetings and other activities. The reduced capacity of the Alliance to act has also reduced the incentive for the more established member organizations to invest their time and energies in the network, rather than in their own work. For all these reasons, the Alliance is now operating at a more modest level than before.

With the support of EEF, it is actively seeking new funding, and there would seem to be a good prospect of success in this endeavour. ACA members are keen to continue to work together on major anti-corruption initiatives, but without external financial support, it is extremely doubtful that the Alliance will be able to continue its work, building on the accomplishments recorded through the UNDEF project.



Planning Meeting of the Student Alliance, National Project on Corruption in the Universities

(vi UNDEF Added Value

The UN label was of assistance in enhancing the credibility of the Alliance with state institutions and in the mass media. EEF took care to ensure that the UNDEF label appeared on all publications and public display materials produced by all of its partners. Partners were pleased to follow this guidance, since it enhanced their own visibility and public appeal.

IV. CONCLUSIONS

(i) With the adoption of the National Anti-Corruption Strategy by the Moldovan Parliament in 2013, the grantee, the East Europe Foundation, recognized that there was an opportunity for civil society to play a more central role in this sphere. The project was designed to take advantage of the opening.

(ii) The project strategy for strengthening the Anti-Corruption Alliance (ACA) as a network, building the capacity of smaller and less-experienced NGOs engaging in anti-corruption work, and facilitating a more visible public presence in the public policy sphere for the Alliance, was well-defined, representing an effective response to the development problem described.

(iii) The project met the test of relevance by focusing on a core problem in Moldovan public life of both high-level and petty corruption, while also working to nurture the development of civil society in light of an appreciation of its current weaknesses and limitations.

(iv) In terms of its contribution to achieving the three outcomes set by the grantee, the project performed strongly. It strengthened the organization of ACA, while also enhancing the quality and extensiveness of its work in advocacy and public dialogue with government. Its consistent attention to ensuring that attention was paid by the mass media to all aspects of the project did a great deal to raise the public profile and credibility of the Alliance. In addition, EEF deployed the limited resources of the project effectively in leveraging new openings through which the Alliance might put forward its proposals to senior officials.

(v) A centrepiece of EEF's efforts to build the capacity of smaller NGOs (both members and non-members of ACA) was the small grants program. By providing preliminary training and financial and advisory support to eight organizations, mainly located outside Chisinau, to address different aspects of anti-corruption work, the project assisted in enhancing their skills in project design and implementation, while also contributing to their self-confidence in undertaking advocacy with local government, along with their commitment to continue their activities in this sphere.

(vi) The project's initiative in providing assistance to the mass media through training as well as support to local and national coverage of corruption-related topics facilitated an increase in the number of media outlets which carried stories on such matters on a regular basis.

(vii) The project component focusing on providing grants for national anti-corruption campaigns was less successful than the small grants program, and there was a disappointing response to the proposal call. Nevertheless, the two proposals which were

accepted were conceptually imaginative and innovative, providing signposts to possible future activities which might yield stronger results.

(viii) One limitation of the project's effectiveness lay in the failure of EEF and ACA to provide an opportunity for ACA members to jointly consider the experience and lessons of the small grants and national campaign programs. Some valuable ideas and approaches to local level anti-corruption work were piloted in the course of the sub-projects, and many of these might be considered as the basis for future initiatives undertaken under Alliance auspices. However, such possibilities were not considered.

(ix) All members of the Alliance gained from the greater prominence for its work and the higher profile with government it gained through the efforts of the project. However, there was a gap between the smaller and less-established members, several of which participated in the small grants scheme, on the one hand, and the core set of organizations which had their own programs and their own sources of financial support, on the other. For the network to succeed in the future, it will be well-advised to seek to close this gap. What the Alliance lacks at present is an interest in devising national-level activities, beyond the capabilities of any individual member, which can engage local CSOs, as well as the core of well-established NGOs.

(x) One of the outcomes sought by the project was to achieve a consolidation and institutionalization of cooperation between the government's principal anti-corruption agencies and civil society. EEF was quite successful in assisting the Alliance to build stronger foundations in securing its place in the most important forums where it might engage at a high level with representatives of public institutions.

(xi) One of the vehicles through which the project pursued its efforts to strengthen the appreciation of the positive role which might be played by civil society in prevention of corruption was the publication and dissemination of three monitoring reports on progress made in implementation of the National Anti-Corruption Strategy. The reports revealed the lack of care and attention given to the implementation process by a majority of the 36 state ministries and agencies responsible for fulfilling different priorities under the Action Plan. By the end of the project, and the publication of the third report, the quality of formal reporting had improved substantially, as had the overall performance of the state agencies in fulfilling their responsibilities. Hence the project succeeded in injecting new energy and professionalism into the process.

(xii) The project supported two international study visits for members of the ACA: one to Romania and one to Georgia. Both activities were well-planned and effective. The visits provided the participants with access to new and highly-relevant knowledge on the role that civil society might play, drawing on lessons learned in two countries, where the challenges faced were quite similar to those currently confronting Moldova.

(xiii) The evaluation team rated the project very highly for its efficiency and professionalism in the management of operations and its stewardship of the budget. Beyond the care and attention given to all aspects of project administration and operations, it is quite apparent that the grantee, EEF, made a substantial contribution of staff time, over and above that which was funded by the project.

(xiv) Despite the adoption by Moldova of a comprehensive legal and regulatory framework for anti-corruption, there has been little evidence of a commitment by the country's elites to put new laws into effect, and few serious cases of corruption have been prosecuted. There is little doubt that the political and social context of the project has had a negative effect in terms of "results on the ground". However, more positively, high-level external pressures, most notably from the EU, are likely to prod Moldova in the direction of more deep-seated reform. The achievements of the project in ensuring that civil society is now solidly positioned with regard to the architecture of anti-corruption will enable it to play a significant role in the shaping of legislation and policy, and to monitor implementation, in the future.

(xv) In the short-and medium-term, the continuation of international funding will be essential to enable the Alliance to sustain the gains it has made through the project and to continue to ensure that the voices of civil society are heard in policy debates on addressing corruption. In the absence of such funding, it is unlikely that the network, per se, will be able to maintain its work.

V. RECOMMENDATIONS

It is recommended that:

(i) EEF and ACA continue to work together to support the development of the capacity of smaller and less-experienced CSOs, while also providing guidance in the development of work focused on issues in anti-corruption at local and district government levels throughout Moldova. (based on Conclusions, ii, iii, v and viii)

(ii) Given that it succeeds in obtaining additional international funding, ACA devotes greater attention to a sharing of experience and to developing joint activities in areas which are beyond the capabilities of individual members to organize and deliver (based on Conclusions iii, viii and ix).

(iii) In project design, EEF give greater attention to “closing the circle”, ensuring that there are opportunities for a sharing of experience and a joint learning of lessons by organizations which have taken part in parallel activities of a similar kind, and for building on this shared experience (based on Conclusion viii).

ANNEXES

ANNEX 1: EVALUATION QUESTIONS

DAC criterion	Evaluation Question	Related sub-questions
Relevance	To what extent was the project, as designed and implemented, suited to context and needs at the beneficiary, local, and national levels?	<ul style="list-style-type: none"> ▪ Were the objectives of the project in line with the needs and priorities for democratic development, given the context? ▪ Should another project strategy have been preferred rather than the one implemented to better reflect those needs, priorities, and context? Why? ▪ Were risks appropriately identified by the projects? How appropriate are/were the strategies developed to deal with identified risks? Was the project overly risk-averse?
Effectiveness	To what extent was the project, as implemented, able to achieve objectives and goals?	<ul style="list-style-type: none"> ▪ To what extent have the project's objectives been reached? ▪ To what extent was the project implemented as envisaged by the project document? If not, why not? ▪ Were the project activities adequate to make progress towards the project objectives? ▪ What has the project achieved? Where it failed to meet the outputs identified in the project document, why was this?
Efficiency	To what extent was there a reasonable relationship between resources expended and project impacts?	<ul style="list-style-type: none"> ▪ Was there a reasonable relationship between project inputs and project outputs? ▪ Did institutional arrangements promote cost-effectiveness and accountability? ▪ Was the budget designed, and then implemented, in a way that enabled the project to meet its objectives?
Impact	To what extent has the project put in place processes and procedures supporting the role of civil society in contributing to democratization, or to direct promotion of democracy?	<ul style="list-style-type: none"> ▪ To what extent has/have the realization of the project objective(s) and project outcomes had an impact on the specific problem the project aimed to address? ▪ Have the targeted beneficiaries experienced tangible impacts? Which were positive; which were negative? ▪ To what extent has the project caused changes and effects, positive and negative, foreseen and unforeseen, on democratization? ▪ Is the project likely to have a catalytic effect? How? Why? Examples?
Sustainability	To what extent has the project, as designed and implemented, created what is likely to be a continuing impetus towards democratic development?	<ul style="list-style-type: none"> ▪ To what extent has the project established processes and systems that are likely to support continued impact? ▪ Are the involved parties willing and able to continue the project activities on their own (where applicable)?
UNDEF value-added	To what extent was UNDEF able to take advantage of its unique position and comparative advantage to achieve results that could not have been achieved had support come from other donors?	<ul style="list-style-type: none"> ▪ What was UNDEF able to accomplish, through the project, that could not as well have been achieved by alternative projects, other donors, or other stakeholders (Government, NGOs, etc.). ▪ Did project design and implementing modalities exploit UNDEF's comparative advantage in the form of an explicit mandate to focus on democratization issues?

ANNEX 2: DOCUMENTS REVIEWED

Project documents:

Project Document, UDF-MOLS-11-469
Mid-term Progress Report
Final Financial Report 04 2015
Final Report
Milestone Verification Mission Reports, 12 August, 2013 and 18 February, 2014
P.O. Additional Note

Other Documents and Reference Materials:

Bertelsmann Stiftung, *BTI 2014, Moldova Country Report*.

European Commission, "Implementation of the European Neighbourhood Policy in the Republic of Moldova: Progress in 2013 and Recommendations for Action", *Joint Staff Working Document*

Freedom House, *Nations in Transit 2014: Eurasia's Rupture with Democracy*.

Institute for Public Policy, Chisinau., *Barometer of Public Opinion, March-April 2014*.

Luke Coffey, "Is Gagauzia next on Russia's List?" *Al Jazeera*, 21 March 2015.
<http://www.aljazeera.com/indepth/opinion/2015/03/gagauzia-russia-list-150318052557225.html>

"Main Points of the Transparency International Presidency of the Anti-Corruption Alliance", not dated.

Robert Coalson, "What's Next for Moldova", *Radio Free Europe/Radio Liberty*, December 2, 2014.

Stefan Wolff: *The Transnistrian Issue: Moving Beyond the Status Quo*: EU Policy Department Study, Directorate General for External Policies of the Union, 10 2012.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224472/evidence-stefan-wolff-the-transnistrian-is

Tony Rinna, "Moldova, the EU and the Gagauzia Issue" *New Eastern Europe*, 14 February 2014.
<http://neweasterneurope.eu/interviews/1097-moldova-the-eu-and-the-gagauzia-issue>

USAID, *An Analysis of the State of Democracy and Governance in Moldova*. Washington, DC: December 2012

Valentina Ursu and Robert Coalson, "East or West? Divided Moldova's Tense Election Season Comes Down to the Wire", *Radio Free Europe/Radio Liberty*, 27 November 2014.

ANNEX 3: SCHEDULE OF INTERVIEWS

17 May 2015, Sunday: Chisinau
Introductory meeting and joint planning, International and National Consultants
18 May 2015, Monday: Chisinau
<ol style="list-style-type: none"> 1. Meetings at East Europe Foundation (EEF) offices; introduction and overview with : Mr. Sorin Mereacre, President; Mr. Andrei Brighidin, Director for M&E; detailed discussions with: Mr. Alexandru Coica, Preject Coordinator and Mr. Andrei Brighidin, Director for M&E; 2. Mrs. Lila Carasciuc, Transparency International Executive Director, and former President ACA; 3. Meeting at Resource Centre for Human Rights (CREDO) with Ms. Olga Bitca, present ACA President, and Mrs. Angela Buliga, ACA Secretary; 4. Mrs. Alina Radu, Chief Editor, Ziarul de Garda.
19 May 2015, Tuesday: Chisinau
<ol style="list-style-type: none"> 1. At EEF offices: Mr. Alexandru Covalschi, President, Centre for Defending the Rights of Patients and People with Disabilities (CADPI); 2. At the offices of National Anti-Corruption Centre: Mr. Vitalie Verebceanu, Head of Corruption Prevention Department; and, Ms. Victoria Ciobanu, Secretary of Monitoring Group for Implementation of the National Anti-Corruption Strategy (NACS); 3. Mr. Mircea Manoli, independent anti-corruption expert and writer of the NACS Monitoring Reports; 4. Lawyers Union of Moldova: Mr. Georghe Avornic, President, and Mrs. Raisa Grecu, Project Director; 5. Centre for Corruption Analysis and Prevention: Ms. Galina Bostan, Executive Director and Ms. Mariana Kalugin, Anti-Corruption Expert.
20 May 2015, Wednesday: Northern Moldova
<ol style="list-style-type: none"> 1. Balti: Ms. Olesea Tabarcea, Executive Director, Legal Clinic at Balti University; 2. Rezina: ADR Habitat, Mr. Valeriu Rusu, President (also Vice-President of ACA); Mrs. Svetlana Rusu, Program Coordinator; Mr. Tudor Iascenco, Chief Editor, "Cuvantal" newspaper; 3. Rezina: Rezina District Public Administration: Mr. Rosllan Socul, Chief of Public Relations Section.
21 May 2015, Thursday: Gagauzia and Southern Moldova
<ol style="list-style-type: none"> 1. Comrat: Institute for Democracy: Mr. Andrei Borsevski, Executive Director; Mrs. Tatiana Servega, President of the Council; 2. Cahul: Axis: Mr. Vitalie Hotnogu, Executive Director.
22 May 2015, Friday: Chisinau
<ol style="list-style-type: none"> 1. Meeting at EEF offices: Debriefing and filling in information gaps with Mr. Alexandru Coica, Preject Coordinator and Mr. Andrei Brighidin, Director for M&E; 2. Wrap-up Meeting and discussion of follow-up work, International and National Consultants; 3. Departure of International Consultant for Vienna and Pristina, Kosovo.

ANNEX 4: LIST OF ACRONYMS

ACA	Anti-Corruption Alliance
CSO	Civil Society Organization
DANIDA	Danish International Development Agency
EEF	East Europe Foundation
EU	European Union
NAC	National Anti-Corruption Centre
NACS	National Anti-Corruption Strategy
NGO	Non-Government Organization
OSCE	Organization for Security and Cooperation in Europe
SIDA	Swedish International Development Agency
UN	United Nations
UNDEF	United Nations Democracy Fund
USAID	United States Agency for International Development