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Sida Decentralised Evaluation

NIRAS Sweden AB

End Term evaluation of the Media Council of Tanzania (MCT) programme support 2018-2024

Final Report

End Term evaluation of the Media Council of Tanzania (MCT) programme support 2018-2024

Final Report
March 2025

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The views and interpretations expressed in this report are the authors' and do not necessarily reflect those of the Swedish International Development Cooperation Agency, Sida.

Sida Decentralised Evaluation 2025:03

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Abbreviations and Acronyms

ADR	Alternative dispute resolution
CoRI	Coalition on Right to Information
CSO	Civil Society Organisation
DEFIR	Dar es Salaam Declaration on Editorial Freedom, Independence and Responsibility
DP	Development Partner
EACJ	East African Court of Justice
EJAT	Excellence in Journalism Awards Tanzania
EPOCA	Electronic and Postal Communications Act
EU	European Union
HRBA	Human Rights-based Approach
IMC	Independent Media Council
IMS	International Media Support
ITP	Media International Training Programme
LHRC	Legal and Human Rights Center
MCT	Media Council of Tanzania
MISA-TAN	Media Institute of Southern Africa Tanzania Chapter
MoU	Memorandum of understanding
MSA	Media Services Act, 2016
MSEK	Million Swedish Krona
NACTE	National Council for Technical Education
OECD/DAC	Organisation for Economic Co-operation and Development's Development Assistance Committee
OHCHR	Office of the High Commissioner for Human Rights
PLANET	Participation; Link to human rights obligations; Accountability; Non-discrimination and equality; Empowerment and capacity development; and Transparency
PVFR	Press Freedom Violations Register
RSF	Reporters Without Borders
SDC	Swiss Agency for Development and Cooperation
Sida	Swedish International Development Cooperation Agency
TAMWA	Tanzania Media Women's Association
THRDC	Tanzania Human Rights Defenders Coalition
ToC	Theory of Change
ToR	Terms of Reference
UN	United Nations
UPR	Universal Periodic Review
UTPC	Union of Tanzania Press Clubs
Vikes	Finnish Foundation for Media and Development

Preface

This **End Term evaluation of Media Council of Tanzania (MCT) programme support 2018-2024** was commissioned by the Embassy of Sweden in Tanzania.

The evaluation took place from September 2024 to February 2025 and was conducted by:

- Greg Moran, Team Leader.
- Marko Gideon, National Media Expert.

Christina Paabøl Thomsen managed the review process at NIRAS. Goberdhan Singh provided the quality assurance. Stephen Chimalo, Programme Officer, managed the evaluation at the Embassy of Sweden in Tanzania.

The authors would like to acknowledge and thank Ziada Kilobo of the Media Council Tanzania for her invaluable assistance with logistical arrangements and responses to queries, and all of those who gave up their time to contribute to the evaluation.

Executive Summary

1. Background

This End Term evaluation of the Media Council of Tanzania (MCT) programme support 2018-2024 was commissioned by the Embassy of Sweden in Tanzania and ran from September 2024 to February 2025. MCT was established by the media fraternity in June 1995 as an independent, voluntary, non-statutory, self-regulatory body to oversee and promote ethical practice, mediate and arbitrate complaints over media practice, promote and advocate for press freedom and the right to information, and promote and ensure high standards and media accountability. The Swedish International Development Cooperation Agency (Sida) has supported MCT for more than a decade, initially with core support but with support since 2018 focused on two of MCT's four outcomes: advocacy and arbitration. Initially intended to run from 2018-2021 and aligned with MCT's Programme Strategy for that period, support was extended via two annual cost-extensions until December 2023 and a no-cost extension in 2024, with a total of SEK 10 million provided over the evaluation period. The agreement between Sida and MCT has come to an end and no further funding is envisaged.

2. Relevance

MCT's Programme Strategy 2018-2021 was aligned with Swedish strategies for Tanzania and the region and with Tanzania's Constitution and development initiatives. Given the context for the media and journalists in 2018, MCT's 2018-2021 Programme Strategy, and Sida's support to the two outcomes, was relevant at the start of the evaluation period. Media organisations and MCT members were consulted during development of the strategy, which also drew on the 2014 Mid Term Review and the 2016 Final Review of the previous strategy. Support to MCT remained aligned with the Strategy for Sweden's Development Cooperation with Tanzania (2020-2024).

During 2022, MCT developed a new Programme Strategy (2023-27). Although some changes were introduced, both Sida-supported outcomes were retained and Sida support remained relevant to MCT's objectives. The biggest challenges in the context up to 2021 were the shrinking space for the media and civil society. In response, the new MCT strategy sharpened the focus on safety of journalists, ethical conduct, and enhancing media quality. MCT also helped to strengthen the Coalition on Right to Information (CoRI) that it had established in 2006 with two other organisations, and increasingly relied on strategic litigation, including a successful challenge with other CoRI members to the Media Services Act (MSA) in the East African Court of Justice (EACJ). In response to the increase in online media, the MCT Constitution was amended in 2016, MCT challenged legislation in court, and the 2020 Code of Ethics for Media Practitioners included a section on online media. Nonetheless, some of those consulted believed the previous management and Board were traditional in their approach and MCT was insufficiently focused on issues in the digital space. Lessons prior to 2024 have been learned and, under its new management, MCT is exploring ways to engage better with online media sources.

3. Coherence

In addition to MCT, the Embassy supported two other media organisations and two key human rights organisations during the evaluation period. Coordination and cooperation between these have been very good and, in addition to partnering with MCT to bring the EACJ challenge, human rights organisations provided invaluable legal support to journalists during repressive periods. The Embassy's selection of partners shows good internal coherence across its human

rights portfolio. Although the collaboration between Sida's partners, including via CoRI, is more 'home grown' than driven by the Embassy, the Embassy has encouraged partners not to do certain things that are already being done by others. The Embassy's partners have outreach across the country, which provided the Embassy with critical information and feedback that helped with planning and to shape the Embassy's dialogue with government during repressive periods. Sida also funded the Media International Training Programme (ITP) from early 2018 until end 2023, implemented in 22 countries including Tanzania. Although the Embassy reported that there was insufficient consultation from the ITP implementers, the Embassy provided space for ITP meetings and workshops and internal coherence remained good. MCT's Programme Strategy is also internally coherent: the four outcomes are closely interlinked and results under the two Sida-funded outcomes also contributed to results under other outcomes and *vice versa*. But while donors generally coordinate through the Donor Working Group and informal coordination takes place amongst those supporting members of CoRI, there is no formal coordination mechanism for those supporting MCT. Some of MCT's development partners are based outside of Tanzania and coordination is no doubt challenging. But while Sida's support to MCT is largely coherent with the support from other donors, there are some areas of overlap or potential overlap in the areas of gender equality and advocacy to address shrinking space.

4. Effectiveness

In line with the terms of reference, the evaluation primarily focused on Sida-supported outcomes. Progress with **advocacy** is noted. MCT regularly engages in its own name and via CoRI with President Samia and the Zanzibar President, government Ministries and officials and parliamentarians on the Mainland and Zanzibar on a range of issues related to the media, including legislation that has been used to curb media freedom and online expression. Public awareness has been conducted across mainland Tanzania and Zanzibar, and MCT coordinates activities and partners in marking and celebrating key international days for the media. Advocacy related to the MSA continued over the entire evaluation period and MCT continues to advocate for all EACJ findings to be implemented. Other examples of advocacy include successfully advocating for the reissuance of licenses to four previously banned newspapers and engaging with various media stakeholders and lobbying and collaborating with the National Council for Technical Education (NACTE) to standardise and review the training curriculum for journalism schools. After many years of MCT advocacy, government agreed to review the Information and Broadcasting Policy 2003 and MCT was invited to make submissions and input in 2023. The Zanzibar Media Committee (established with MCT support) has also made progress advocating for a new and less restrictive media law for Zanzibar. MCT also led the formation of the East Africa Press Councils and is a member of the World Association of Press Councils, which assists it to broaden advocacy efforts across the region and internationally.

MCT increasingly uses strategic litigation as part of its advocacy strategy and approach, most notably regarding the MSA in the EACJ, but also to challenge the banning of a newspaper for 24 months and successfully overturning a court decision that had jailed three investigative reporters for thirty years. It has also brought various challenges to laws and regulations affecting the media in Tanzanian courts. MCT has successfully ensured that media owners and organisations support MCT initiatives to influence political processes, its advocacy efforts have been widely reported in the media, and journalism colleges confirmed that they use advocacy work in their teachings on media law. But while some political stakeholders under President Samia may be more supportive of MCT's and CoRI's positions and some amendments have been achieved, the current Minister of Communication seems less inclined to amend legislation. But while government has refused to implement some amendments to the MSA ordered by the EACJ, **any** changes to legislation and regulations because of MCT advocacy should be seen as a success in the Tanzanian context.

Alternative dispute resolution (ADR) is a core function of self-regulation and is intended to foster a responsible and accountable media, enhance ethical practice, and resolve conflicts between the media and the public. MCT maintained a strong focus on improving ethical standards to reduce the number of complaints against the media. The Yearbook on Media Quality and Annual Report on State of the Media were produced to improve compliance with ethical norms and quality standards, the Code of Ethics for Media Professionals was reviewed and reprinted, and thematic guidelines on ethical reporting were adopted, reviewed and disseminated. MCT also conducted workshops and seminars for journalists and editors on ethical issues, ran public awareness campaigns to highlight the importance of ethical journalism, and provided training on ethics for journalism students. Nonetheless, some deficiencies and ethical transgressions persist.

MCT's ADR processes are highly rated and compliance with agreements and decisions is high. Decisions are posted on the MCT website and social media and outcomes are covered by the media. In some cases, courts have even referred cases to MCT to use ADR to settle grievances. MCT has provided radio advertisement to raise public awareness of its services and raises awareness during Ethics Committee visits and visits to journalism schools. However, the number of cases dealt with by mediation and arbitration has declined. Possible reasons are less high-profile people stopped engaging or affiliating with non-governmental organisations during President Magufuli's era; efforts to raise awareness of ethical issues and offer advice and guidance may be helping to reduce the number of complaints; some editors and media owners have installed internal mechanisms to deal with complaints; press clubs are resolving some cases at local level; some people simply prefer to use the courts; fewer adverts are being aired in Dar es Salaam since funding is limited; and MCT staff address and avoid potential complaints by monitoring the media and providing feedback to improve quality and performance. It is also noted that using the number of complaints received as an indicator is problematic: while it might indicate a lack of trust in or awareness of MCT's ADR services, it might also indicate that MCT's training and focus on ethics has reduced the number of complaints.

The evaluation also considered progress towards the two outcomes the Embassy did not directly support. Primarily with International Media Support funding, MCT maintained the **Press Freedom Violations Register** over the evaluation period. The Register was used to document, publish and follow up on press freedom violations for media houses, journalists' associations and human rights defenders to use it as a tool, while authorities, societal stakeholders and the public are provided with empirical evidence of abuses. Results are also shared during the Universal Period Review, with the United Nations Special Rapporteur on Freedom of Expression, with regional bodies, and are used as a reference by media professionals, activists and researchers. Safety of journalists has increased, and Tanzania improved significantly on the Reporters Without Borders World Press Freedom Index after President Samia assumed office. Although attributing such changes to any one organisation is difficult and it coincides with President Samia's easing of restrictions on the media, it can be assumed that MCT contributed given its large number of members from across the country that includes all types of role-players.

MCT has constantly **monitored the media** to assess trends in professional and ethical standards, provide members of the media with information on how to improve their quality and services to the public, and to input into MCT's interventions. Results of media monitoring are included in the Yearbook of Media Quality and biennial State of the Media Report. MCT has been able to sustain the **Excellence in Journalism Awards Tanzania (EJAT)** for 15 consecutive years and has steadily increased the number of categories to include emerging areas. EJAT has incentivised quality reporting, built the confidence of women and young journalists, helped build the confidence of rural based reporters and small media outlets in far-flung districts, and raised the profile of journalists and MCT.

Sida's contribution to salaries and operational and administrative costs allowed MCT to focus on all outcomes, including those funded by other donors that do not always cover such costs. Factors contributing to MCT's success include that it was created by the media and is media owned; its broad membership and network; its longevity and staying power; its ability to survive the period of repression under President Magufuli. MCT has impressive convening power and its relationship with rights and access to justice organisations enabled it to challenge the MSA in the EACJ and provide support to journalists and media houses during the clampdown on media freedom under President Magufuli. MCT has actively engaged with government in a constructive manner, even during more oppressive times, and has developed an impressive network of international and regional partners that provide encouragement, assistance and advice. It was granted observer status by the African Commission on Human and People's Rights in 2020, was at the forefront of the formation of the East Africa Press Council and is a prominent member of the World Association of Press Councils. MCT's Executive Secretary was also elected as the first Chairperson of the Network for Independent Media Councils in Africa in May 2024 and MCT hosts its Secretariat. Beneficiaries of MCT's support are the entire media sector in Tanzania and Zanzibar: journalists, media owners and houses, editors, women journalists, journalism students (particularly at colleges), government media, and members of the public.

5. Gender equality and the human rights-based approach (HRBA)

Gender equality and representation within MCT is good, specific activities have been conducted (such as developing and promoting policies and sensitisation), and gender equality was mainstreamed into MCT activities and outcomes. In partnership with the Tanzania Media Women's Association and the Media Institute of Southern Africa Tanzania Chapter, MCT implemented a Women in the Media project during the evaluation period. The project was directly funded by Vikes with some support from Sida and Wellspring via their core support to MCT. Under this, MCT designed a model Gender in the Media Policy, mentored women journalists, and revised its Gender in the Media Training Manual. MCT also conducted seminars for media managers and assisted the Corporation of Government Newspapers to adopt a gender policy and establish a gender desk. The EJAT has prominently featured female journalists among winners and the training curriculum developed with NACTE also includes a module on gender equality and social inclusion. But despite progress, Tanzania remains a patriarchal society and changing attitudes and behaviour remain a challenge. And while MCT has partnered with many of these to enhance gender equality, women's rights NGOs continue to conduct media-focused activities independently of each other and in an uncoordinated fashion

MCT's compliance with the **HRBA** is good. Membership is open to all members of the media and participation is excellent, with around 250 members across the Mainland and Zanzibar. Strong links with human rights obligations were found, including participation in the Universal Periodic Review process. MCT provides a mechanism for resolving complaints, including those brought by government, and trains and collaborates with private and government owned media and civil society. It has a strong focus on the needs of rights holders and has internal policies on gender equality and the rights of vulnerable group. MCT actively seeks to build the capacity of the media to claim its rights and avoid violating the rights of rights holders, and it operates in a transparent way.

6. Impact

Some impact and potential for impact is noted with MCT's advocacy. Although the more contentious provisions remain, some amendments to the MSA have been made. Advocacy efforts related to legislation and policy also have more potential for success under the current administration. But when measured against the impact indicator in this area, most restrictive laws remain in place despite MCT's and others' best efforts. MCT and its members have

vigorously defended and continue to play a key role in self-regulation. Although government seems intent on establishing the state regulatory body envisaged in the MSA, MCT will continue to have a role in self-regulation and has successfully defended its position in that regard during the evaluation period.

MCT's focus on ethics has remained strong although some areas require further effort. The self-censorship that the media engaged in during the Magufuli era continues despite the increased opening of space for the media. MCT, in collaboration with other CoRI members, was able to assist members of the media during the worst periods of repression, the number of press violations has decreased, and Tanzania's position on the World Press Freedom Index has increased considerably. Although partly driven by the current administration's more liberal attitude to the media, MCT's focus on safety of journalists and press violations provided valuable information to government on the type and frequency of violations that needed to be addressed.

Determining Sida's contribution to the overall impact level in MCT's results frameworks and the reconstructed theory of change is difficult given that the evaluation primarily focused on two of the four outcomes and three of the MCT impact indicators relate to outcomes that Sida did not directly support. Nevertheless, Sida's direct contribution to two outcomes and indirect contribution to others has achieved some, albeit limited, impact and has the potential to contribute to impact in future.

7. Sustainability

MCT's focus on both individual and organisational development contributes to the potential for results to be sustained. Individual journalists, media managers and others are better informed and qualified to perform their roles and MCT's support to media organisations and institutions, media houses and journalism colleges that will continue to bear fruit CoRI, established by MCT and two other organisations, has expanded its membership and will continue to exist. Although incomplete, changes to law and policy also have the potential to enhance sustainability of benefits. However, MCT faces two significant challenges in the immediate future:

- As a major donor, the fact that Sida funding has come to an end creates a **funding gap**. MCT has taken steps to try to address this and some progress is noted. Since it is likely that the Embassy will continue to fund human rights and media organisations that partner with MCT, some of the effects may be mitigated. But many development partners have been diverting funding to the Ukraine and Middle East and the future of United States development assistance is unclear and potentially ominous.
- Although the EACJ ruled that provisions in the MSA related to the Journalists Accreditation Board needed to be revised, government has established the Board and appears to be pushing forward to create the Independent Media Council (IMC) envisaged by the MSA. The IMC will have similar functions to MCT in the areas of complaint resolution, a code of ethics, and media monitoring. Nonetheless, MCT will still have a crucial role to play in self-regulation, complaints handling (noting that the IMC only has authority over print media), advocacy and strategic litigation to improve media legislation and policy, and training to enhance professionalisation and ethics. Even if the IMC is established, MCT and the IMC could both provide complaint resolution, allowing anyone aggrieved to choose the body they trust and that best suits their needs. In January 2025, the MCT Board has agreed that, while advocacy work continues, MCT will co-exist and take advantage of the co-existence of the IMC to perform its roles.

Recommendations for Sida / the Embassy

1. If possible under the new Swedish strategy for Tanzania, the Embassy should continue to fund organisations like Union of Tanzania Press Clubs and JamiiForums to advance media freedom and freedom of expression, and organisations like Legal and Human Rights Center

- and Tanzania Human Rights Defenders Coalition to provide legal support and assistance to journalists despite the end of MCT funding.
2. The Embassy should continue to identify regional and global Sida programmes that might include support to MCT in future and assist MCT to engage with implementers of such programmes for MCT inclusion under them.

Recommendations for MCT

1. To address the probable establishment of the IMC, MCT should focus on its strengths and the things that make it unique, including its free ADR services. It should enhance public awareness of its roles and functions and increase understanding amongst citizens and donors that it is a better option than the IMC in areas where it has unique functions (such as promoting self-regulation) and strengths.
2. To enhance understanding of its ADR role amongst donors and better illustrate the important role it provides, MCT should work with UTPC to develop its monitoring systems to better reflect complaints press clubs resolve with MCT support and should keep a record of all informal efforts it makes to prevent defamatory or unfair and unethical reporting by the media.
3. To enhance advocacy efforts, MCT should consider developing a comprehensive advocacy strategy and encourage similar media and human rights focused organisations to adopt or contribute to the strategy.
4. Although public awareness can be expensive, MCT has already secured agreements with some stations to air adverts for free and other no- or low-cost options should be explored – including by developing joint public awareness fundraising proposals with other organisations, and consulting with other media organisations and CSOs to include information on MCT’s ADR functions and how to access them in public awareness publications they produce and activities they conduct.
5. MCT should do more to explain to digital media and citizen journalists that the more willing they are to submit to self-regulation, the better chance they have of avoiding over-regulation by government. By joining the MCT fold, they will also gain protection from MCT and its vast network and bolster MCT’s membership and resilience.
6. CoRI provides MCT with an excellent network to advocate for change, launch strategic litigation, and enhance safety of journalists. MCT needs to consider some of the criticisms coming from within the coalition and focus efforts on finalising the CoRI strategic plan, MoU and Communication Strategy that have been shared with CoRI members for approval during the first quarter of 2025.
7. MCT should consider strengthening and publicising its succession mechanism or strategy to avoid the lengthy process to appoint the current Executive Secretary and to allay concerns that the process is not sufficiently transparent.
8. MCT should investigate the possibility of developing a joint programme and strategic plan with like-minded organisations to deliver a comprehensive and coordinated programme on women and the media.
9. A similar joint programme with other MCT and CoRI partners on internet governance should be considered to that on gender equality in the bullet point above.
10. In addition to seeking out new sources of funding, MCT should consider mechanisms for coordinating its existing and new donors. For example, it could hold joint monthly or six-monthly meetings with donors to share progress, highlight new ideas, and see whether any existing donor is prepared to fund new ideas.

1 Introduction

1.1 BACKGROUND

The Embassy of Sweden in Tanzania ('the Embassy') contracted NIRAS to conduct an **End Term evaluation of the Media Council of Tanzania (MCT) programme support 2018-2024**. The evaluation ran from September 2024 to February 2025 and was conducted by:

- Greg Moran, Team Leader.
- Marko Gideon, National Media Expert.

1.2 EVALUATION PURPOSE, SCOPE PERIOD AND GEOGRAPHIC FOCUS

The latest agreement between the Swedish International Development Cooperation Agency (Sida) and MCT (2018 to 2024) has come to an end. No further funding is envisaged and the Embassy sought to learn what worked and what has not worked well during this period. MCT has entered a new leadership era, with a new Executive Secretary and Board from January 2024, and the intention is that the evaluation findings will provide insight and knowledge to MCT's new management going forward.

According to the terms of reference (ToR),¹ the **purpose** of the evaluation was to:

- Help Sida and MCT assess progress of the intervention (ongoing at the time most of the evaluation was undertaken) and learn from what works well and less well.
- Inform MCT decisions on adjustments and improvements, serve as an input for the current MCT Programme Strategy period (2023-2027), and inform the MCT Strategy mid-term evaluation to be conducted during 2025.
- Provide the wider development community with lessons learned about the topic.

The evaluation was therefore expected to be both summative and formative, with a focus on utilisation and learning.

The **primary users** of the evaluation are:

- The MCT project management team and the overall MCT management and board.
- Sida's Unit for Human Rights and Democracy and the Embassy.
- Other donors that currently fund MCT.

Other stakeholders to be kept informed about the evaluation include:

- The Ministry of Information, Communication and Information Technology.
- Other donors with an interest in the media sector in Tanzania.
- Media houses and press clubs in Tanzania.

¹ The ToR are attached as Annex 1.

The ToR limit the **scope** of the evaluation to the two outcomes that Sweden has directly supported (advocacy and arbitration and mediation), and the contribution of such support to the overall goal / impact. As further explained in Section 1.4 below, it was agreed during the inception phase that the evaluation would also consider whether Sida's support has directly or indirectly contributed to the two other outcomes in the MCT programme strategies (press freedom violation register and media monitoring). The **evaluation period** was 2018-2024 and included the period from 2018-2021 under the original agreement with Sida as well as the cost extensions for 2022 and 2023 and the no-cost extension for 2024. The **geographical focus** was both mainland Tanzania and Zanzibar.

1.3 APPROACH AND METHODOLOGY

1.3.1 Overall approach

Using the reconstructed theory of change developed in consultation with the Embassy and MCT during the inception phase as its starting point (see Section 2.2 below), the evaluation followed a theory-based approach to articulate the pathway of systemic change envisaged, explore what happened, and why the envisaged change did or did not occur.

The evaluation was utilisation- and learning-focused; participatory; confidential; transparent; and gender sensitive and rights-based throughout.

- The evaluation team maintained communication with MCT and the Embassy throughout the process, validated their findings before finalising the draft report, and shared inception and draft reports for comments before finalisation. Lessons learned have been used to develop the report's recommendations.
- To ensure confidentiality, the evaluators complied with the Chatham House Rule,² kept notes of interviews strictly confidential, and have included minimal personal details in the annex of stakeholders consulted.
- To enhance transparency and accountability, the evaluation team shared the draft inception and final report for input and conducted a validation meeting with MCT and the Embassy to present main findings and conclusions at the end of the on-site mission. The evaluation report, once approved, will also be published and accessible to the public on Sida's webpage.
- To ensure adequate participation, as many views of partners and external stakeholders as possible were sought out and included in analysis and reporting.
- In the area of gender sensitivity, the evaluation team sought out the views of more women than men (more than 50% of those consulted were women), and the report includes a specific assessment of gender equality in Chapter 3 that was added to the list of evaluation questions during the inception phase.

Outcome harvesting and contribution analysis were used to explore what outcomes in the programme's results framework have been achieved as well as any other unexpected results, and the degree to which the programme contributed to these outcomes.

² Where what is said during consultations may be used in the evaluation but has not been attributed to any individual or stakeholder in the report.

1.3.2 Phases

The evaluation included four phases: start-up and inception; data collection; data analysis and reporting; and dissemination.

i. Start-up and inception phase (26 September-8 November 2024)

The evaluation began with a start-up meeting with the Embassy and MCT Executive Secretary on **26 September 2024** to discuss and clarify issues arising from the ToR and to begin to identify key stakeholders to be consulted. The **inception phase** began immediately after the start-up meeting and included a **document review** of available documents (which continued throughout the assignment)³, discussions with MCT to further identify stakeholders to be consulted and how best to consult them and fine tuning the logistical and methodological planning. The team then prepared a **draft inception report** with revised methodology and workplan, and an evaluation matrix with revised evaluation questions based on preliminary discussions with MCT and the Embassy. The draft report was submitted to the Embassy and MCT on **16 October 2024** for written comments to be submitted by **1 November 2024**.⁴ In the interim, the team convened an online **inception meeting** with the Embassy and MCT on **25 October 2024** to present the draft inception report and to clarify any issues raised in it before written comments were submitted.

The team submitted the **final inception report** on **13 November 2024**, accompanied by a **comment sheet** setting out how each main comment has been addressed.⁵ The Embassy approved the final inception report on **14 November 2024**.

ii. Data collection phase (29 October- 11 December 2024)

Data collection began on 29 October with a series of remote interviews with MCT's regional and international partners, and development partners based outside of Tanzania (although most remote interviews took place from 11-15 November). The team then conducted a two-week on-site mission in Tanzania mainland and Zanzibar from **18-29 November 2024**.⁶ During these consultations, the evaluation team consulted 44 stakeholders (23 women and 21 men):

- The Head of Cooperation and current Programme Officer at the Embassy, and the former Embassy Programme Officer responsible for MCT.
- The current and former MCT Executive Secretaries; ⁷ Programme Officer, Advocacy, Ethics and Alternative Dispute Resolution and Zanzibar Senior Programme Officer.
- A current MCT Board Member.
- Representatives of a sample of MCT partner organisations and other media organisations in Tanzania and Zanzibar.⁸
- A Member of the Zanzibar House of Representatives.

³ The list of documents consulted is attached as Annex 2.

⁴ As noted in the comment sheet, there was a delay in receiving comments, which were only sent to the evaluation team on 12 November 2024.

⁵ The Inception Report is attached as Annex 4.

⁶ The list of stakeholders consulted remotely or in person is attached as Annex 3.

⁷ The former Executive Secretary was not available during much of the data gathering process and asked to be sent written questions, to which he responded on 15 December 2024.

⁸ Kibaha Institute of Journalism Studies; Media Institute of Southern Africa – Tanzania; Organisation of Journalists Against Drug and Crime in Tanzania; Tanzania Media Women's Association (mainland and Zanzibar); Twaweza East Africa; Arusha Press Club; Corporation of Government Newspapers (Zanzibar); Legal and Human Rights Centre; Union of Tanzania Press Clubs; Tanzania Editors Forum; Tanzania Human Rights Defenders Coalition; University of Dar es Salaam School of Journalism; Chama cha Waandishi wa Habari za Maendeleo Zanzibar; Zanzibar Broadcasting Council; JamiiForums.

- Representatives of a sample of regional and international MCT partners and development: World Association of Press Councils, East Africa Press Councils' Association, International Center for Not-for-Profit Law, Office of the High Commissioner for Human Rights (OHCHR) East Africa Regional Office.
- MCT donors during the evaluation period: Wellspring Philanthropic Fund ('Wellspring'), Finnish Foundation for Media and Development (Vikes), International Media Support (IMS) and Ford Foundation.
- Other development partners supporting media freedom, freedom of expression, safety of journalists in Tanzania but which do not fund MCT directly: European Union (EU) and Swiss Agency for Development and Cooperation (SDC).

Since the delayed start meant the final report would not be available during MCT planning processes scheduled for December 2024 (see Section 1.4 below), the evaluation team prepared a debriefing note and PowerPoint presentation of their preliminary main findings, conclusions and recommendations and shared it with MCT and the Embassy on **5 December 2024** for discussion at a virtual **debriefing / validation workshop** on **11 December 2024** before more detailed analysis and reporting began.

iii. Analysis and reporting (9 December 2024-14 February 2025)

Data analysis began after the validation meeting, during which the evaluation team analysed and triangulated data obtained from primary and secondary sources (documents, interviews, roundtable discussions, programme data, etc.) and comments received during the validation workshop. Analysis and triangulation of data ensured that information received was accurate and correctly interpreted, and that data from multiple sources was pulled together into a coherent narrative of what occurred at the programme level.

Based on this analysis, the team prepared and submitted the **draft evaluation report** to the Embassy and MCT for comments on **24 January 2025**. Comments to the draft report were received from the Embassy on 7 February 2025 and from MCT on 11 February 2025. All comments have been addressed in this **final evaluation report**, submitted to the Embassy on 14 February 2025 with a comment sheet setting out how all comments had been addressed.

iv. Dissemination seminar (21 February 2025)

On 24 February 2025, the team conducted a **virtual dissemination seminar** for MCT and the Embassy on the final approved report and its main findings, lessons learned and recommendations.

1.4 LIMITATIONS AND CHALLENGES

The first challenge encountered during the evaluation was the delayed start. To accommodate the fact that MCT was in a transition process and the Embassy was engaged in cost-extension assessments on other projects at the time, the start-up meeting envisaged for 8 August 2024 in the ToR only took place on 26 September 2024, which meant that the Executive Secretary's hope that the report would be ready in time to feed into planning for 2025 (scheduled for December 2024) was not realisable. To address this, the evaluation team constantly updated the Executive Secretary on emerging findings and potential recommendations during the evaluation, prepared a detailed debriefing note, and conducted a validation workshop in December 2024 to provide input to future planning.

A bigger challenge was that, in the ToR, the Embassy limited the evaluation to the two outcomes that Sida directly contributed to: advocacy and arbitration. In line with this, data gathering did not include a specific focus on the two 'other' outcomes in the programme strategies – press freedom violation register (broadened in the 2023-27 Strategy to include a more direct focus on safety of journalists) and media monitoring (also broadened in the 2023-

27 Strategy to include media development and monitoring). Based on preliminary discussions during the inception phase, it emerged that Sida funds had also been used to fund staff and administration. It was agreed to add a question to the list of the evaluation questions in the inception report to consider how Sida's support to the two outcomes it directly supported might have contributed to the realisation of other programme outcomes, without broadening the evaluation to specifically consider these outcomes. The question in the ToR related to impact was also amended slightly to consider whether support to the two outcomes contributed to the intended overall impact. Although it emerged during data gathering that Sida's support is probably best described as 'earmarked core support' and that its contribution to other outcomes and overall might have been more than what initially appeared, the entire evaluation approach, sample of partners and others to consult, evaluation questions etc. had been designed based on the ToR. It was not possible to revise the approach during data gathering to include a detailed consideration of other outcomes that were directly funded by other donors. Instead, the overview of the main results in the 'other' outcomes in this report (see Section 3.3.3) is primarily based on MCT reports and programme documents that, unfortunately, could not always be triangulated with responses during interviews and discussions. Nevertheless, evidence was found from reports and some consultations that Swedish funding had contributed to results funded by other donors, most of which did not include funding for staff and administration costs that were borne by Sweden, which was sufficient on which to base conclusions in the body of the report.

MCT has been in existence since 1997, and is a major role-player in Tanzania's media space, and has built relationships and partnerships with most Tanzanian media bodies, universities and journalism schools, and media and human rights civil society organisations (CSOs). It also chairs the Coalition on the Right to Information (CoRI) – a large coalition of 16 media, human rights and legal and access to justice organisations with a shared ideal of promoting and defending freedom of expression and access to information.⁹ And it has developed relationships and partnerships with regional and international media organisations over the years. There was thus some question as to how many 'impartial' voices could be found on MCT's performance. To address this, the evaluation team stressed during interviews that key informants should feel free to express themselves, that anything they say will be treated in strictest confidence, and that one of the main reasons for the evaluation is for MCT to learn from past experiences, both positive and negative, so that the new leadership is aware of where it needs to improve. Sufficient objective criticisms were thus found to provide a balanced view.

The fact that MCT has many national and international stakeholders also means that there were potentially many organisations to consult. To avoid reaching a 'point of saturation' (where the same responses are received in multiple interviews), the evaluation team, in consultation with MCT, identified a sample of national and international partners best placed to speak about MCT's work and results. The data collection phase also included days for remote consultations with regional, international and other stakeholders and development partners prior to and following the on-site mission to Tanzania.

Finally, events in Tanzania suggest that the political space and the space for the media and civil society might be becoming constrained (see Section 2.1 below). There were concerns within the evaluation team during the inception phase related to the safety of participants in the evaluation and their confidence and freedom to express their views. To address this, the evaluation was designed to be conducted with the greatest respect for confidentiality and privacy and not to expose stakeholders to risk during data collection or dissemination. But

⁹ CoRI is described in more detail in Section 2.2 below and in various places in this report.

initial concerns within the evaluation team that participants might be reluctant to participate or that their safety might be compromised proved unfounded and all participants were able to express themselves freely without any concerns being raised.

2 The Media Council of Tanzania

2.1 CONTEXT

During a period of reform in the early 1990s, then President Ali Hassan Mwinyi appointed a Presidential Commission (the ‘Nyalali Commission’) in 1991 to gather citizens’ opinions of the type of democracy they wanted in Tanzania. A major finding of the Commission was the need for a review of the 1977 Constitution and 40 repressive laws, including those related to freedom of expression and media freedom.¹⁰ The Nyalali Commission recommendations also led to an amendment of the 1977 Constitution of the United Republic of Tanzania in 1992 to introduce multipartyism.

As a result of increasing liberalism, the media sector grew swiftly.¹¹ However, the proliferation of media outlets during the 1990s did not match the number of properly qualified media practitioners, and members of the sector lacked ethical standards in reporting, complaint mechanisms and training. To pre-empt designs for a statutory media body to regulate and control the media,¹² the media fraternity came together in June 1995 to establish the MCT as an independent, voluntary, non-statutory, self-regulatory body. MCT was officially registered in 1997 under the Societies Ordinance of 1954 to:

- Oversee and promote ethical practice.
- Mediate and arbitrate complaints over media practice.
- Promote and advocate for press freedom and the right to information.
- Promote and ensure high standards and media accountability.

Despite early progress, the evaluation period (2018-2024) coincided with a stifling of political opposition, restricted media freedom, and increasingly shrinking space for civil society under President John Pombe Joseph Magufuli (2015-2021). Political opponents, activists and journalists faced arrest and detention, harassment, intimidation, and disappearances. Some CSOs’ bank accounts were frozen, and many were forced to close. In response, journalists and media houses began to self-censor to avoid exposing themselves to the risk of retribution.¹³

¹⁰ The Commission was particularly concerned with the Newspapers Act 1976 that limited the rights to freedom of the press, opinion, expression and information in the Constitution, and the Tanzania News Agency Act 1976 that empowered the Minister to refuse, revoke and suspend any authorisation to collect and distribute news and news materials without providing reasons for the decision. Such decisions were also not appealable. See the Final Report on Designated Legislation in the Nyalali Commission Report, 1994.

¹¹ In 2022, Reporters Without Borders (RSF) identified 257 newspapers, 200 radio stations, 46 TV channels, 474 online TV channels and around 100 news websites RSF World Press Freedom Index: <https://rsf.org/en/country/tanzania>

¹² 2018-2021 MCT Programme Strategy, pp. 7-8.

¹³ Some of those consulted noted that journalists and media houses not only stopped being critical of government, some stopped reporting on government at all, including positive stories, lest the stories were misunderstood or misinterpreted by government.

The constitutional reform process introduced in 2011 by President Jakaya Kikwete (2005-2015) stalled and the Magufuli administration introduced numerous restrictive laws in the period immediately preceding the evaluation period: the Cybercrimes Act of 2015, the Access to Information Act of 2016, and the Media Services Act (MSA) of 2016. The MSA largely maintained the draconian provisions of the News Agency Act 1976 and Newspapers Act 1976 that the Nyalali Commission had found to be unconstitutional. Other laws impacting on freedom of the media and freedom of expression also remained in place, including the Penal Code; the Film and Stage Plays Act, 1976; National Security Act, 1970 (which replaced the Official Secrets Ordinance); Terrorism Act, 2003; and Electronic and Postal Communications Act, 2010.¹⁴ Similarly repressive legislation in Zanzibar included the Zanzibar Broadcasting Commission Act No. 7 of 1997; some Articles of the Zanzibar Constitution of 1984; the House of Representatives (Immunities, Powers and Privileges) Act, 2007; Registration of News Agents, Newspapers and Books Act No. 5 of 1988; and the Zanzibar Penal Code.¹⁵

Following President Magufuli's death in March 2021, Vice President Samia Suluhu Hassan (commonly referred to as 'President Samia') became Tanzania's first female president. President Samia initially adopted a more diplomatic and inclusive approach, focusing on restoring relations with international partners, reopening political and civic space, and addressing economic challenges exacerbated by COVID-19 (which President Magufuli had claimed did not exist). President Samia established a task force on the Constitution that held consultations around the country, a Commission on Criminal Justice Reform that released its recommendations in late 2023, and the ban on political rallies was also lifted in 2023. As a result, freedom of the media and safety of journalists increased once President Samia assumed office, although there are emerging signs of repression of political opponents and shrinking space for civil society and the media as the 2025 national elections draw nearer.¹⁶

The latest MCT State of the Media Report 2022- 2023 (dated July 2024) identifies several critical areas for the media that still require intervention: the lack of a supportive legal environment; journalists are still arrested and assaulted;¹⁷ journalists continue to be denied access to information; and the safety and security of journalists are frequently compromised.¹⁸ In the 18 months preceding July 2024, the MCT database recorded a further 41 press violations – 41% of which occurred between January and end of June 2024. The 2022- 2023 State of the Media Report also highlights increased levels of disinformation, misinformation, fake news, press violations, gender imbalance, and unethical reporting.

¹⁴ 2023-2027 Programme Strategy, p. 21.

¹⁵ Ibid., p. 22.

¹⁶ For example, on 1 October 2024, the Tanzania Communications Regulatory Authority (Tanzania's communications regulator) suspended the digital platforms of a media company (Mwananchi Communications) over the publication of what it called restricted content. In early September 2024, the body of a senior opposition leader who had been abducted from a bus by armed men was found on the outskirts of Dar es Salaam with signs he had been beaten and had had acid poured on his face. See: <https://www.timeslive.co.za/news/africa/2024-10-03-tanzania-suspends-media-companys-online-platforms-for-30-days/>

¹⁷ MCT Semi-Annual Report, 2024, p. 26.

¹⁸ Quoted in the MCT Semi-Annual Report, 2024, p. 2.

2.2 THE MEDIA COUNCIL OF TANZANIA

2.2.1 Overview

As mentioned above, MCT was established in 1995 (and registered in 1997) because media practitioners believed that self-regulation is the best way of dealing with ethical lapses and ensuring government authorities do not take steps to curb press freedom.¹⁹ MCT is a voluntary, membership-based organisation, currently with around 250 members across the Mainland and Zanzibar. The fact that membership is voluntary ensures that all members agree to the concept of self-regulation. Membership is institutional and includes both privately owned and government owned media. Members include print and electronic media outlets, journalists' professional organisations, press clubs and journalism training institutions.

MCT's day-to-day activities are conducted by a Secretariat, headed by the Executive Secretary. Its objectives are to:

- Promote, assist, safeguard and defend freedom of the media and allied forms of public communication in the United Republic of Tanzania.
- Oversee that journalist, editors, broadcasters, producers, directors, proprietors and the entire media industry in Tanzania adhere to the highest professional and ethical standards.
- Receive and conciliate, mediate and/or arbitrate complaints from the public, governmental and other bodies, and amongst members of the media, against alleged infringements of the MCT Code of Ethics.
- Encourage development of the media profession in Tanzania by undertaking activities that include training of journalists, promoting development of press clubs, conducting media freedom campaigns, research, seminars, workshops and symposia.
- Maintain a register of developments likely to restrict the supply of information of public interest and importance, keep a review of the same, investigate the conduct and attitude of persons, corporations and governmental bodies at all levels towards the media, and publish reports on such investigations.
- Involve the public in MCT's work and keep them informed about its operations, views and decisions.
- Promote and defend the interests of readers, viewers, and listeners.
- Promote gender sensitivity, equality, and equity in reportage and dissemination of information.
- Promote quality and sensitivity in reporting issues of people with disabilities and other vulnerable groups.
- Publish papers, journals, newsletters and other materials to achieve these objectives.

Initially focused on checking ethical lapses in the media and mediating public complaints through its Ethics Committee,²⁰ MCT's activities expanded over time to include training on ethics and professionalism. It also established two information research centres for media practitioners, scholars, researchers and journalism students in both Zanzibar and Dar es

¹⁹ 2023-2027 Programme Strategy, p. 9.

²⁰ The Ethics Committee is constituted by the Governing Board from amongst its members but is an autonomous adjudication organ of the Council. It is made up of at least four members, two of whom must be 'media people'. MCT Constitution, Article 17.

Salaam.²¹ MCT's engagement in advocacy for greater media freedom and freedom of expression has also increased over time. In 2006, MCT joined with the Tanzania Media Women's Association (TAMWA) and the Media Institute of Southern Africa Tanzania Chapter (MISA-TAN) to create the Coalition on the Right to Information (CoRI) to lobby for changes to the proposed Freedom of Information Bill of 2006. Since then, and in response to over-regulation, restrictions on the media and harassment of journalists under President Magufuli, CoRI has grown to include 17 media and human rights and access to justice organisations (including MCT).²² At least two of CoRI's members were also specifically nurtured into being by MCT: Union of Tanzania Press Clubs (UTPC) and Tanzania Editors Forum.

In addition to CoRI, MCT also helped to establish the Zanzibar Media Committee that includes all key role-players in Zanzibar and has similar advocacy functions to CoRI.²³

2.2.2 MCT Programme Strategies

Sida's support during the evaluation period was linked to the 2018-2021 Programme Strategy and based on the initial expected duration of the project (2018-2021). As illustrated in Table 1 below, the **2018-2021 Programme Strategy** defines MCT's **vision** as 'a democratic Tanzania with a free, responsible and effective media'. Its **mission** is 'to create an environment that enables a strong and ethical media that contributes towards a more democratic and just society'. MCT's **overall goal** is 'to defend and expand the perimeters of freedom of expression and freedom of the media and ensure the highest professional standards and accountability so that the Tanzanian media is able to contribute effectively to development and democratic processes, providing the citizens with critical means of holding their leaders to account'.²⁴ The 2018-Strategy lists four outcomes: advocacy area; press freedom violation register; arbitration;²⁵ and media monitoring.

MCT developed a new **MCT Programme Strategy 2023-2027** that retains the same vision, mission and goal statements as in the previous strategy, but subtly changes names (and numbering) of the outcomes, referring to them as 'programme objectives', but the agreement

²¹ While the media is not a union matter, the MCT has an office in Zanzibar that coordinates and follows development of the media in the Isles. Most media produced on the mainland is also consumed in Zanzibar.

²² Current CoRI members are MCT, Twaweza, Sikika, Legal and Human Rights Centre (LHRC), Tanzania Editors Forum, TAMWA, Tanzania Human Rights Defenders Coalition (THRDC), MISA-TAN, Tanzania Development Information Organisation, Policy Forum, JamiiForums, UTPC, Organisation of Journalists Against Drugs and Crimes in Tanzania, Tanzania Citizens' Information Bureau, Media Owners Association of Tanzania, and the Tanganyika Law Society.

²³ Members are Tanzania Media Women Association Zanzibar, Hamasa Media Group, Association of Journalists Zanzibar, Zanzibar Press Club, and Pemba Press Club. The Committee also invites Zanzibar Legal Service Centre – a former Sida partner – and THRDC Zanzibar when it needs legal input.

²⁴ P. 18. It is noted that this statement differs from the results framework, where it is stated as: 'An environment for freedom of expression and of the media is enhanced and defended and the media exercising their rights, enabling them to provide the public with diverse information and views based on professionalism'. It will be clarified during the evaluation which version is corrected, but that stated above is a better 'goal statement' than the one in the results framework and has been used to develop the reconstructed theory of change.

²⁵ MCT's Programme Strategies and the ToR refer to 'arbitration'. Many of the complaints brought to MCT (and Press Clubs) are resolved by the Secretariat using informal discussions, conciliation and mediation. Where parties do not reach agreement following mediation, the matter is tabled with the Ethics Committee for arbitration. We have chosen to refer to MCT's role as 'mediation and arbitration' in the body of the report to make this clearer.

with Sida was not amended to align with this strategy and Sida's support continued to align with and reflect the previous strategy.

Table 1: Comparison between the 2018-2021 Strategy and 2023-2027 Strategy

2018-2021 Strategy	2023-2027 Strategy
Vision 2018-2021	Vision 2023-2027
A democratic Tanzania with a free, responsible and effective media.	A democratic Tanzania with a free, responsible and effective media.
Mission 2018-2021	Mission 2023-2027
To create an environment that enables a strong and ethical media that contributes towards a more democratic and just society.	To create an environment that enables a strong and ethical media that contributes towards a more democratic and just society.
Overall goal 2018-2021	Overall goal 2023-2027
To defend and expand the perimeters of freedom of expression and freedom of the media and ensure the highest professional standards and accountability so that the Tanzanian media is able to contribute effectively to development and democratic processes, providing the citizens with critical means of holding their leaders to account.	To defend and expand the perimeters of freedom of expression and freedom of the media and ensure the highest professional standards and accountability so that the Tanzanian media is able to contribute effectively to development and democratic processes, providing the citizens with critical means of holding their leaders to account.
Outcomes 2018-2021	Corresponds to Programme Objectives in the 2023-2027 Strategy
Outcome 1: Advocacy Area	Programme Objective 1: Policy and Legislation Advocacy
Concerted efforts by media and political stakeholders to make current media and other laws and regulations more media friendly and accountable to press freedom.	To enable the media to perform its duties freely and effectively and the public to enjoy freedom of expression and access to information.
Outcome 2: Press Freedom Violation Register	Programme Objective 2: Press Freedom and Journalists Safety
The Press Freedom Violation Register is installed and widely used by journalists and editors, made public by the media, and used by civil society and Members of Parliament for action in favour of press freedom.	To enhance press freedom and journalists' safety and security through networking, capacity building, documenting and publishing and following up on press freedom violations so that media practitioners and human rights defenders are provided with empirical evidence and can use it as a tool.
Outcome 3: Arbitration	Programme Objective 4: Ethics and Alternative Dispute Resolution
MCT arbitration of complaints is improved and widely accepted by the public and the media.	To enhance ethical practice and conciliate between media and public thus ensuring media accountability, efficacy and credibility.
Outcome 4: Media Monitoring	Programme Objective 3: Media Development and Monitoring
The quality of the media in Tanzania is well known and it is used to strengthen ethical norms and to raise the level of professionalism.	To proactively foster media quality and ensure sustainability so that media effectively fulfil its roles.

While not dissimilar to the outcomes in the previous strategy, the programme objectives in the 2023-2027 Strategy better comply with an outcomes-based approach and clarify what results MCT aims to achieve. They also suggest an increased and/or more explicit focus on media development and safety of journalists in response to the recent experiences during the Magufuli presidency.

2.2.3 Theory of change

Although programme documents do not include a theory of change (ToC), the following reconstructed ToC was included in the inception report for the period 2018-2024. Given that Sida funding was originally only intended to cover the period 2018-2021, the current report

focuses primarily on the wording, objectives and intended outcomes in the 2018-2021 strategy. Some references are made to subtle changes of focus in the 2023-2027 strategy where appropriate. But to assist MCT in its attempts to finalise a theory of change under the new Executive Secretary, the following reconstructed theory of change is based on both strategies.

Table 2: Reconstructed theory of change

Reconstructed theory of change	
Level	Narrative
Input level	<i>If</i> MCT, with the financial and other support:
Activity / Output level	• coordinates efforts to reform the legislative and regulatory environment for the media through lobbying, awareness and targeted litigation; • <i>and</i> monitors and raises awareness of violations of media freedom, freedom of expression and the rights of journalists; • <i>and</i> provides a space for public complaints against journalists and the media to be resolved through alternative dispute resolution mechanisms; • <i>and</i> monitors the media to determine and raise awareness of positive trends and compliance with ethical norms and standards; • <i>and</i> provides or contributes to training for journalists and media houses on ethics and professionalism; • <i>and</i> encourages gender equality and inclusion within the media;
Intermediate outcome level	• <i>then</i> levels of media and journalistic professionalism, compliance with ethical standard will increase; • <i>and</i> the environment for access to information, freedom of expression and freedom of the media will be enhanced and defended; • <i>and</i> levels of gender equality and inclusion within the media will increase; • <i>and</i> public trust in MCT as alternative dispute resolution mechanism will increase; • <i>and</i> public trust in the media will be enhanced;
Outcome level	• <i>leading to</i> enhanced freedom of expression, access to information, freedom of the media and safety of journalists; • <i>and</i> the media being more professional, ethical, representative and accountable, able to provide diverse and accurate information that the public can trust;
Impact level	• <i>ultimately contributing to</i> an informed public, able to hold duty-bearers to account and contribute to democracy in Tanzania.

Assumptions: As partly identified in the risk analysis in the 2018-2021 Programme Strategy,²⁶ the reconstructed ToC assumes that:

- Sufficient human and financial resources would be available, and funding would be timeously disbursed.
- MCT would avoid suspicion that it was pandering to foreign influence given its level of foreign funding.
- MCT would continue to undertake systematic follow-up of results.
- Government would continue to allow the media to self-regulate and conduct arbitration and not put in place a government regulation body or system to do the same.
- Government would not enact laws and policies to curtail freedom of the media, freedom of expression, access to information and the space for the media to operate in Tanzania.
- Government would be amenable to considering amendments to laws and regulations to improve the environment for the media.
- MCT would be able to efficiently deliver services despite the vastness of the country and infrastructure bottlenecks.
- Implementation partners would fulfil their roles, in partnerships and coalitions, and contribute to implementation of the strategic plan.
- Members of the public will know how to lodge complaints with MCT and trust its decisions.
- Members of the media will be willing to submit to mediation and arbitration of complaints and comply with the findings.

²⁶ MCT Programme Strategy 2018-2021, pp. 33-35.

- Media houses and journalists will be willing to provide true and accurate information and not provide mis- or dis-information when it is in their financial or other interests.

Towards a new Theory of Change

Since the current Executive Secretary's appointment in mid-January 2024, the new MCT leadership has engaged with internal and external stakeholders and development partners to develop a new ToC for future activities. The following overall ToC is presented in the MCT 2024 Semi-Annual Report:

“Strengthening the capacities, systems and resources at MCT leads to credibility and legitimacy to effectively, efficiently and timely coordinate the collaborative efforts of stakeholders and coalitions towards enabling healthier information environment for a functioning independent media system in the country for a democratic Tanzania with free, responsible and effective media.”

The outcomes of the ToC are:

- Outcome 1: Enabling legal and media viability environment that guarantees press freedom, safety and security of journalists, editorial independence and self-regulation.
- Outcome 2: Promoting highest journalism professional standards and accountability.

Each outcome includes indicators and strategies for delivering the outcomes.

By end December 2024, the ToC was still under development. While the available versions contain valuable information towards a ToC, it does not yet articulate the pathways to the change to which MCT aims to contribute. Much of what is available, including the 2023-2027 Programme Strategy results framework, could be used to develop a more ‘traditional’ version of a ToC – as was done in formulating the above reconstructed ToC for 2018-2024. Although developing a new ToC is beyond the scope of the current evaluation, MCT management could consider the version provided above as part of that process.

2.3 SIDA'S SUPPORT TO MCT

Sida has supported MCT for more than 10 years to collaborate with other actors to strengthen human rights related to the media in the Constitution, press freedom, and democratic governance, and to fulfil its mandate of promoting freedom of the media and ensuring the highest professional standards and accountability within the sector. Although most previous support was core funding, Sida's last agreement with MCT specifically targets two outcomes. It initially included a budget of 5 MSEK for the period 2018-2021 but was twice extended:

- A cost extension for 2022-2023 with a further 5 MSEK added.
- A no-cost extensions for 2024 to address the fact that the recruitment process for the new Executive Secretary had taken longer than expected.

According to the ToR, Sida's support to MCT under the latest agreement aimed to solve two problems that were of particular concern to Sweden at the time: the restrictive media environment and laws infringing media freedom; and the lack of public awareness of procedures and mechanisms available to hold media houses accountable for false or incorrect reporting. Sida's support thus only focused on two outcomes in the 2018-2021 Strategy: Outcome 1 (Advocacy Area) and Outcome 3 (Arbitration). However, Sida's support was also relatively flexible (for example, it allowed funds to be used for gender equality) and included funding for salaries and administrative costs that included some support to other outcomes funded by other donors. It is thus probably best described as a form of earmarked core funding.

3 Findings

3.1 RELEVANCE

The following questions were included in the inception report related to relevance:

Evaluation Questions – Relevance	
1.	Was the Programme Strategy relevant to the needs of journalists and the media in Tanzania given the context at design and available evidence on what works? (<i>Relevance at design.</i>)
2.	Have the objectives and design continued to be relevant if/when circumstances have changed? (<i>Relevance over time.</i>)

3.1.1 Relevance at design

MCT's Programme Strategy 2018-2021 was aligned with Swedish strategies for Tanzania and the region:

1. Although support to the media is not specifically mentioned in the Results Strategy for Sweden's International Development Cooperation in Tanzania (2013-2019), it is in line with Result Area 3: Strengthened democratic accountability and transparency, and increased awareness of human rights. It is also mentioned in the description of the result area at the end of the Strategy.²⁷
2. The Strategy was also aligned with the Strategy for Sweden's Regional Development Cooperation for Africa that, *inter alia*, seeks to contribute to democratic development, increased respect for human rights, gender equality, rule of law, and reduced corruption.

MCT's 2018-2021 Programme Strategy was aligned with Tanzania's Constitution (particularly rights related to access to information and freedom of expression in Article 18) and development initiatives such as Vision 2025. And given the context for the media and journalists in 2018 and the recent passage of legislation such as the Cybercrimes Act 2015 and the MSA, all of those consulted agreed that MCT's 2018-2021 Programme Strategy, and Sida's support to the two outcomes, was relevant to the context in 2018. One concern that arose for the evaluators was that Sida's support to MCT did not directly focus on MCT's outcome related to press freedom violations, which were at their peak in 2018. The counterargument though is that Swedish support to MCT should not be seen in isolation. The Embassy was also supporting organisations such as LHRC and THRDC that were providing legal and emergency support to those journalists and media houses facing arrest, detention and harassment. And other donors (Vikes, IMS and Ford Foundation) were also already supporting or planning to support MCT in this area.

²⁷ The text reads 'Sweden has comparative advantages in terms of assisting the development of institutional capacity for a functioning democracy with free media'. (2013-2019 Strategy, p. 6.)

Although the evaluation team was only able to find a few people who were around during the development of MCT's 2018-2021 Programme Strategy, those that were found confirmed that their organisations had been consulted during development of the strategy. The strategy also drew on the 2014 Mid Term Review and the 2016 Final Review of the previous strategy that pointed to specific areas and activities in need of improvement. Feedback from Council members and stakeholders was also considered during the strategy development.²⁸ In addition, MCT includes almost all members of the media. MCT members were reportedly consulted during strategy and workplan development processes during Annual General Meetings, CoRI meetings and other discussions and networks that MCT participates in.

3.1.2 Relevance over time

Support to MCT remained aligned with the Strategy for Sweden's Development Cooperation with Tanzania (2020-2024).²⁹ Although the COVID-19 pandemic forced MCT to change the way it operated, it did not affect the relevance of MCT or Sweden's support.

During 2022, MCT developed a new five-year Programme Strategy (2023-27) that drew on an internal review of the 2018-21 strategy, a survey of MCT members and stakeholders, and a two-day engagement with representatives of media stakeholders. A draft strategy was prepared and discussed and refined by the MCT secretariat, and the budget was developed before being approved by the Governing Board.³⁰ Although some changes were introduced based on the context and to better align with the outcomes-based approach, both outcomes supported by Sida were retained and Sida support thus remained relevant to MCT's objectives.

The biggest issues in the context up to 2021 remained the increasingly closing space for the media and civil society in legislation³¹ and the ongoing harassment, arrests and detention of members of the media under President Magufuli. While the design of the new programme strategy was not fundamentally changed to address these challenges, some changes were made to address the context. For example, the new strategy sharpened the focus on safety and security of journalists, ethical conduct, and enhancing media quality to address the challenges under the Magufuli administration. MCT also helped to strengthen CoRI during the evaluation period to increase the resilience of the media and civil society by creating 'safety in numbers' and making it more difficult for government to target or move against any one organisation. MCT also increasingly relied on strategic litigation, including, together with LHRC and THRDC, a successful challenge to the MSA in the East African Court of Justice (EACJ) – see Section 3.3.1 below.

In response to the emergence of new forms of online media and the challenges it creates, the MCT Constitution was amended in 2016 to include online media, MCT filed a challenge to the

²⁸ 2018-2021 Programme Strategy, pp. 5-6.

²⁹ Although support to the media is again not specifically listed under the three objectives in the strategy, it fits under the first objective: Human rights, democracy, the rule of law and gender equality. It is also specifically mentioned later in the document as an area Sweden should support. The strategy notes that (1) 'Support to media actors should be included to catalyse space for opinion formation and knowledge about human rights, democracy and the principles of the rule of law', and (2). 'It is important to support actors who work with accountability in relation to public institutions, such as traditional media and various digital platforms that work to increase transparency, access to information and increased participation in decision-making processes'. At p.5 of the English translation.

³⁰ MCT Programme Strategy 2023-2027, pp. 7-8.

³¹ Including the MSA, Electronic and Postal Communications Act Regulations of 2018, 2020 and 2022, and Cybercrimes Act of 2015.

Electronic and Postal Communications Act (Online Content) Regulations in the Mtwara High Court in 2019, and the 2020 Code of Ethics for Media Practitioners includes a section on online media. MCT also started a process to develop an Online Media Code of Ethics. Nonetheless, some of those consulted believed the previous management and Board were traditional in their approach and MCT was insufficiently focused on issues in the digital space (restrictions, accountability etc.). A key citizen journalism and online media CSO (JamiiForums) – a Sida partner and a CoRI member — has also yet to join MCT. Lessons prior to 2024 have been learned and, under its new management structure, MCT is exploring ways to engage better with online media sources. For example, MCT has introduced an award for those in the digital space in its Excellence in Journalism Awards Tanzania project and includes debates on the role of new forms of media during training. Getting citizen journalists and online content producers to submit to a self-regulatory body will be challenging though given their resistance to quality control and fact checking.

3.2 COHERENCE

The evaluation considered both aspects of the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD/DAC) definition of coherence – internal and external coherence – with one question for each aspect included in the inception report:³²

Evaluation Questions -- Coherence	
3.	Was Sida's support to MCT coherent with other Sida support to the media, freedom of expression, and human rights generally?
4.	Has Sida's support to the programme been coherent with the support to the media, freedom of expression and rights of journalists provided by other development partners?

3.2.1 Internal coherence

In addition to MCT, the Embassy supported two other media organisations during the evaluation period: UTPC and JamiiForums. It also supported two key human rights and access to justice organisations – LHRC and THRDC – that provide legal and other services to journalists and that cooperated with MCT in bringing its case to the EACJ. UTPC is a member of MCT and was established with MCT's encouragement and assistance, and LHRC, JamiiForums and THRDC are members of CoRI.³³ Coordination and cooperation between these organisations has been very good and, in addition to the EACJ challenge, LHRC and THRDC provided invaluable legal support to journalists during repressive periods.

The Embassy's selection of civil society partners working in human rights and those focused on freedom of journalists and the media / freedom of expression, and its support to collaboration amongst the various partners, shows good internal coherence across its human

³² OECD/DAC define internal coherence as the extent to which synergies and interlinkages were created between Sida's support to MCT and other Sida support to the media, freedom of expression, democracy and human rights in Tanzania. External coherence assesses how coherent Sida's support to MCT has been with the support of other development partners supporting media freedom, freedom of expression and related rights in Tanzania. It includes levels of complementarity, harmonisation and coordination with others, and the extent to which Sida's adds value to the support of others while avoiding duplication of effort.

³³ JamiiForums is a member of CoRI but not of MCT.

rights portfolio. Although not a member of MCT, Sida's support to JamiiForums complements its support to MCT. MCT has led CoRI's advocacy around media freedom, while JamiiForums has led CoRI's advocacy around digital rights and the media. Although the collaboration between Sida's partners, including via CoRI, is more 'home grown' than driven by the Embassy, the Embassy has encouraged its partners not to do certain things that are already being done by others.³⁴ The financial support also contributed to the work of CoRI by facilitating Sida partners' attendance and participation in CoRI meetings and activities.

Sida's partners also have outreach across the country, which provided the Embassy with critical information and feedback on what was happening on the ground during periods of repression. Such feedback helped with planning and to shape the Embassy's dialogue with government during the evaluation period, but also allowed for critical information to be shared amongst partners to inform their actions and response.

MCT's Programme Strategy is also internally coherent. The four outcomes are closely interlinked and results under the two Sida-funded outcomes have also contributed to results under other outcomes, and *vice versa*. For example:

11. Complaints that MCT receives and resolves through ADR feed into MCT's capacity development activities to enhance ethical standards and quality of journalism, and informed the formal curriculum developed by MCT and NACTE. According to MCT, complaints provide valuable insights into the ethical challenges faced by journalists and media houses.
12. Training and capacity development benefits from MCT's assessments of laws that limit the media conducted as part of its advocacy efforts, and feed into capacity development on how journalists can comply with the legal requirements as they stand.
13. Media monitoring and the PFVR provide essential information for advocacy efforts by highlighting the issues members of the media face.

Finally, Sida also funded the Media International Training Programme (ITP) under its International Capacity Development Programme. The ITP Media Self-Regulation in a Democratic Framework programme ran from early 2018 until end 2023 and was implemented in 22 countries in five regions: Southern and Eastern Africa (including Tanzania from late 2018), Asia, Eastern Europe, Latin America, and the Middle East and North Africa region. Staff of MCT were included during implementation and the Embassy. Although the Embassy reported that there was insufficient consultation from the ITP implementers during implementation, the Embassy did provide space for ITP meetings and workshops. One of ITPs reported outputs was the introduction of the Tanzania Digital Media Awards in 2020, which shows coherence between Sweden's bilateral and regional support to the media in Tanzania.

3.2.2 External coherence

The main development partners supporting the media, freedom of expression and journalists are Sida, SDC, the EU, Vikes, IMS, Ford Foundation and Wellspring – all of which, other than the EU, supported MCT with project funding or general support during the evaluation period.³⁵

³⁴ For example, when UTPC indicated in its funding application that it was planning to include journalism awards, the Embassy pointed out that MCT already has its Excellence in Journalism Awards Tanzania that Sida indirectly supports.

³⁵ MCT also collaborated with other partners for specific activities during the evaluation period. For

As acknowledged by the Embassy, while donors generally coordinate support to human rights and democracy through the Donor Working Group and coordination takes place amongst those supporting members of CoRI or informally, there is no formal coordination mechanism for those supporting MCT. Some of MCT's partners are based outside of Tanzania, are in different continents and time zones, and coordination is no doubt challenging. But while Sida's support to MCT is largely coherent with the support of other donors, there are some areas of overlap or potential overlap. In particular, various donors support gender equality in the media and advocacy to address shrinking space, but coordination with these remains limited, creating the potential for duplication of effort and for key issues to be underfunded.

3.3 EFFECTIVENESS

As mentioned in Section 1.4 above, the ToR limited the evaluation to the two outcomes specifically included in the agreement with Sida – arbitration and mediation, and advocacy. Based on discussions during the inception phase that suggested that Sida funds were also used to fund other outcomes, a question was added to those in the ToR to allow for consideration of whether Sida funding also contributed to other outcomes. The following questions were thus included in the inception report:

Evaluation Questions -- Effectiveness	
5.	Has the programme achieved, or can it be expected to achieve, the objectives and results included in Sida-funded outcomes?
6.	Has Sida's support contributed to the achievement of other programme outcomes?
7.	What contributed to the programme achieving its results and who benefitted from them?
8.	How flexible was the programme during implementation and were lessons learned used to adapt the programme to changes in the context?

3.3.1 Advocacy³⁶

Outcome indicators for the advocacy area in the 2018-21 Programme Strategy are:³⁷

- Political stakeholders support MCT / CoRI concerted positions on media laws and/or schedule amendments to the law which are in line with MCT position.
- Media owners and media organisations start their own or support MCT initiatives to influence political processes.
- Advocacy efforts by MCT and others are covered widely by the media.
- Journalism colleges use advocacy work in their teachings on media law.

example, MCT collaborated with the International Center for Not-for-Profit Law and United States Agency for International Development in 2018 to create a practical handbook for journalists, human rights defenders and CSOs on the legal framework impacting their work and strategies for addressing the challenges the laws create. Training manuals based on the handbook were developed and MCT were supported to train lawyers litigating cases on media freedom.

³⁶ Although this falls outside the evaluation period, it is noted that MCT played a major role during the process to revise the constitution from 2011 that led to the inclusion of press freedom and the right to information in the proposed Tanzanian Constitution. This process stalled though after President Magufuli came to power in 2015.

³⁷ The results framework for the 2023-27 Programme Strategy contains outcome indicators based on surveys of media houses and journalists and public perception surveys that are impossible to measure until such surveys have been conducted.

i. Advocacy

MCT regularly engages in its own name and via CoRI with President Samia and the Zanzibar President, government Ministries and officials³⁸ and parliamentarians on the Mainland and Zanzibar³⁹. Advocacy efforts have focused on a range of issues related to the media, including changes to restrictive legislation such as the MSA, Electronic and Postal Communications Act (Online Content) Regulations of 2018, and Cybercrimes Law that have been used to curb media freedom and online expression.⁴⁰ Public awareness campaigns have been conducted across mainland Tanzania and Zanzibar, and MCT also coordinates activities and partners in marking and celebrating key international days: World Press Freedom Day, the International Day to End Impunity for Crimes Against Journalists, and the International Day for Universal Access to Information.

Advocacy related to the MSA continued over the entire evaluation period. MCT continues to advocate for all EACJ findings to be implemented (see text box below) and was doing so in meetings with the Minister during the on-site data collection. Other examples of advocacy mentioned during consultations and in reports include:

- MCT, along with other stakeholders, successfully advocated for the reissuance of licenses to four previously banned newspapers in 2022⁴¹ as part of a broader government initiative under President Samia's administration to reduce restrictions on the media.
- Starting in 2011, MCT successfully engaged with various media stakeholders to gather insights and expertise, lobbied and collaborated with the National Council for Technical Education (NACTE) to standardise and review the Competence Based Education and Training curriculum for journalism schools to ensure that the curriculum met the set NACTE standards and procedures and provided a solid foundation for journalism education.⁴² The curriculum was again reviewed in 2016 and then went through a more detailed review in 2019. It has been formally adopted by NACTE and is being used by at least 21 journalism training institutions across the country, allowing students to transfer easily between colleges and making it easier for colleges to measure competence and results.⁴³ MCT continues to take part in periodic reviews of the curricula.
- After many years of MCT advocacy for the Information and Broadcasting Policy 2003 to be reviewed, government finally agreed to a review and MCT was invited to make submissions and input in 2023.⁴⁴ A revised has yet to be finalised though.
- The Zanzibar Media Committee (established with MCT support and coordinated by the Zanzibar office) advocated for a new and less restrictive media law. It conducted an analysis of the Zanzibar constitution and two major laws⁴⁵ and, with other stakeholders,

³⁸ Including the Ministry of Communication and Information Technology and the Chief Government Spokesperson and the Director of Information Department.

³⁹ Including the Parliamentary Standing Committee on Constitutional and Legal Affairs.

⁴⁰ See for example, 2023 Annual Report, p. 13.

⁴¹ Mawio, Tanzania Daima, Mseto, and MwanaHalisi.

⁴² A notable participant in this process was the Kibaha Institute of Journalism that, with other stakeholders, was reported by MCT to have played a key role in shaping the curriculum to address the needs of the media profession effectively.

⁴³ Partner interview, 13 November 2024.

⁴⁴ 2023 Annual Report, p. 11.

⁴⁵ The Newspaper Act of 1988 (as amended in 2010) and the Zanzibar Broadcasting Act of 1997.

developed a Bill that is reported to be close to adoption. Even though the Zanzibar government has not finalised the review of the law, MCT has used the presidential commitment during the commemoration of World Press Freedom Day in 2023 as an advocacy tool in its advocacy efforts.

MCT also led the formation of the East Africa Press Councils and is a member of the World Association of Press Councils, which assists it to broaden advocacy efforts across the region and internationally. But while it successfully coordinated seven universities to jointly design a Dar es Salaam Declaration on Editorial Freedom, Independence and Responsibility (DEFIR)⁴⁶ course outline and delivered lectures on DEFIR in universities and sensitisation of editors on the course⁴⁷, revising the curriculum at universities is more complex and results have not yet been achieved.

ii. Strategic litigation

MCT uses strategic litigation as part of its advocacy strategy and approach, most notably with regard to the MSA (as described in the textbox below).

MCT, LHRC and THRDC v The Attorney-General of the United Republic of Tanzania, East African Court of Justice, Case No. 2 of 2017 (decided in March 2019)

As noted in Section 2.1, the Media Services Act (MSA) 120 of 2016 retained many provisions of the News Agency Act 1976 and Newspapers Act 1976 that the 1991 Nyalali Commission had found to be unconstitutional. The Magufuli government passed the MSA despite strong objections from MCT and members of CoRI (amongst others). In 2017, CoRI members launched a two-pronged challenge to the Act:

- Supported by MCT, UTPC and Hali Halisi Publishers Ltd. lodged a constitutional case with the Mwanza High Court.⁴⁸
- MCT, LHRC and THRDC ('the applicants') filed a case with the EACJ, alleging that the MSA contained provisions that contravened Articles 6(d), 7(2), and 8(1)(c) of the East African Community Treaty.⁴⁹ The applicants contended, *inter alia*, that the MSA violated freedom of expression by restricting the type of news and content that could be covered; introducing a mandatory requirement that journalists must be accredited by the Board of Accreditation; and that the MSA restricts freedom of expression and access to information by criminalising publication of rumours and providing criminal penalties for defamation without considering the publisher's intentions.

⁴⁶ The DEFIR was adopted by MCT and opened for endorsement at Dar es Salaam on March 18th, 2011. It sets out the responsibilities and obligations for all media actors – including the state, media owners and editors, advertisers, business and political allies of owners, politicians and donors – to foster and protect editorial independence to ensure that editors and other practitioners have the freedom to make decisions based on professional requirements and ethical imperatives.

⁴⁷ 2023-27 Programme Strategy, p. 13. Participating universities were Tumaini University Dar es Salaam College, Muslim University of Morogoro, Open University of Tanzania, St. Augustine, School of Journalism and Mass Communication of University of Dar es Salaam, Theophil Kisanji and Iringa University.

⁴⁸ 2023-2027 Programme Strategy, p. 11.

⁴⁹ Article 6(d) sets out the fundamental principles governing the EAC, which include good governance, democracy, rule of law, and promotion and protection of human rights. Art. 7 requires partner states to abide by these fundamental principles. And Art. 8 enjoins partner states to abstain from any measures likely to jeopardise the achievement of the objectives. For an overview of the EACJ challenges, see Nyonzu, F., Enforcing Regional Judiciary Decisions: The Case of Tanzania's Media Services Act, African Centre for Media Excellence, May 2023, internet: <https://acme-ug.org/2023/05/15/enforcing-regional-judiciary-decisions-the-case-of-tanzanias-media-services-act/>

Although the Mwanza High Court dismissed UTPC's constitutional challenge because it was deemed to have been filed too late, the EACJ heard the MCT challenge and handed down its ruling on 28 March 2019. The Court agreed with the applicants that 16 of the 18 clauses they complained about violated the East African Community Treaty and required the Tanzanian government to take action to remedy the situation. Government attempted to appeal the decision in 2019, but the EACJ Appellate Division struck the appeal out in June 2020 because the government failed to submit the appeal in time.⁵⁰

Some progress has been made in this regard and nine amendments were made to the MSA in June 2023 and February 2024. Amongst others, defamation cases were reclassified from criminal to civil offences, fines for publishing certain content were reduced, and government is now able to advertise in private media outlets.⁵¹ However, the review of the MSA did not address 12 sections that impact on media freedom, including requirements for annual licensing of newspapers that leads to self-censorship; the powers of the Accreditation Board; and the requirement for private media houses to broadcast or publish news or issues of national importance as the Government may direct.⁵² MCT continues to lead advocacy efforts for the Act to be further revised in line with the EACJ ruling. According to those consulted, while some of the more contentious sections of the MSA remain, the EACJ decision has been referred to in Universal Period Reviews and Sustainable Development Goals Reports. Advocacy has also raised public awareness of the challenges in the MSA and the restrictive environment it creates and has led to the establishment of solid networks and coalitions that also lead to safety in numbers.⁵³

Other examples of strategic litigation reflected in reports include:

- MCT supported Hali Halisi Publishers Ltd. to challenge the banning of MwanaHalisi newspaper for 24 months from September 19, 2017. In its ruling of 24 August 2018, the High Court ordered the unbanning of the newspaper.⁵⁴
- During 2018, MCT was able to successfully overturn a court decision that had jailed three Mwanza investigative reporters for thirty years.⁵⁵
- According to 2019-2024 Annual Reports, MCT brought an appeal against an earlier dismissal of its challenge to the Electronic and Postal Communications Act (EPOCA) (Online Content) Regulations in the Mtwara High Court in 2019. While the appeal was still pending, the Minister for Information, Culture, Arts and Sports published new EPOCA (Online Content) 2020 Regulations, rendering the case nugatory. MCT, together with LHRC, then filed a new challenge with the EACJ in 2020, and also partnered with LHRC in another case against EPOCA (Online Content) 2020 Regulations at the High Court in Mbeya. Together with CoRI members, MCT also engaged with the Permanent Secretary on the Regulations. Government then agreed to amend EPOCA Regulations including those for Online Content, 2020, TV and Radio Broadcasting, 2020, and Licensing. In January 2022 government published new EPOCA (Licensing) Regulations, 2022, and EPOCA (Digital and other Broadcasting Networks and Services) Regulations, 2022. And in March 2022, government published new EPOCA (Radio and Television Broadcasting Content) Regulations, 2022 and EPOCA (Online Content) Regulations, 2022. However,

⁵⁰ 2023-2027 Programme Strategy, p. 11.

⁵¹ The Written Laws (Miscellaneous Amendments) Act, 2023.

⁵² MCT Annual Report, 2023.

⁵³ The EACJ decision was also reported by one of MCT's international partners to have emboldened other media organisations and councils in the region to bring similar challenges, although this could not be independently verified.

⁵⁴ Miscellaneous Cause No. 2 of 2018, referred to in the 2023-2027 Programme Strategy, p. 11.

⁵⁵ Criminal Case No. 207 of 2018: Republic versus Christopher Gamaina & George Ramadhani. Reported in the MCT 2018 Annual Report, p. 15.

none of the more recent court challenges to EPOCA, including in the EACJ, have yet been finalised.

MCT has successfully ensured that media owners and organisations support MCT initiatives to influence political processes, its advocacy efforts have been widely reported in the media, and journalism colleges consulted during the evaluation confirmed that they use advocacy work in their teachings on media law. But while it is safe to say that some political stakeholders under President Samia may be more supportive of MCT's and CoRI's positions and some amendments have been achieved, some (such as the current Minister of Communication) seem less inclined to amend legislation, and the indicator related to scheduling of amendments is only partially achieved. Even so, it was noted during consultations that Tanzania's ruling party is extremely powerful, laws are passed or changed at the government's whim, and successfully advocating for change is extremely challenging in the context. When seen from that perspective, **any** changes to legislation like the MSA and EPOCA Regulations as a result of MCT advocacy should be seen as a success.

3.3.2 Conciliation, mediation and arbitration

Note: MCT programme documents refer to 'arbitration', but many complaints are dealt with by conciliation and mediation and only those that cannot be resolved this way are referred to arbitration by the Ethics Committee. Arbitration, mediation and conciliation are all forms of alternative dispute resolution (ADR) and, to avoid narrowing the focus to only arbitration, the term ADR is used in the text that follows.

Outcome indicators in the 2018-21 Programme Strategy are:

- MCT arbitration is known to the general public as a central measure of dealing with complaints and acknowledged.
- Arbitration compliance rules are strengthened, and media comply with decisions.
- Arbitration cases are covered by the media.
- Editors and media owners install internal mechanisms to prevent arbitration cases.
- Journalism colleges use the arbitration cases in teaching.

i. ADR and self-regulation

ADR is a core function of self-regulation⁵⁶ and is intended to foster a responsible and accountable media,⁵⁷ enhance ethical practice, and resolve conflicts between the media and the public. It thus aims to ensure media accountability, efficacy and credibility.⁵⁸ The aim of MCT's ADR is to address wrongs such as false or defamatory content in a win-win way by providing remedies such as apologies, retractions, or clarifications. Complaints are dealt with judiciously, speedily, and cost-effectively compared to litigation, and in a way that will clear the name of the aggrieved party if the media outlet acted contrary to journalistic norms. ADR also provides an opportunity to a media outlet to learn from its mistakes.⁵⁹

⁵⁶ 2018-2021 Programme Strategy, p. 9.

⁵⁷ Ibid, p. 7.

⁵⁸ Ibid, p. 19.

⁵⁹ 2023-2027 Programme Strategy, p. 9.

1. *Ethical standards*

In line with the adage that prevention is better than cure, MCT maintained a strong focus on improving ethical standards throughout the evaluation period to reduce the number of complaints arising from false, defamatory or misleading reporting. Although the link between ADR and ethics is not explicit in the results framework for the 2018-2021 Programme Strategy, activities related to ethics (including visits by the Ethics Committee to media houses and the Media Ethics Symposium) are listed under this outcome.⁶⁰

The Programme Strategy and results framework also include ethical assessments during media monitoring, including monitoring of social media and reports from members of the public of ethical transgressions.⁶¹ Monitoring products like the Yearbook on Media Quality and Annual Report on State of the Media are also intended to improve reporting according to ethical norms and quality standards. The Code of Ethics for Media Professionals was reviewed and reprinted in 2020 and thousands of copies distributed to journalists, colleges and media houses. Thematic guidelines on ethical reporting, such as Guidelines on Court Reporting, the DEFIR, and Guidelines on Ethical Reporting, have also been adopted, reviewed and disseminated.

MCT also conducts workshops and seminars for journalists and editors on ethical issues, including accurate reporting, gender sensitivity, and the handling of sensitive topics. MCT conducted public awareness campaigns in 2018 and 2021 to highlight the importance of ethical journalism, distinguishing professional media from unethical, sensationalist practices and engagements with media owners and managers to promote self-regulation and uphold ethical standards within their organisations. Ethical awareness and training for journalism students was also provided, including in collaboration with the Kibaha Institute of Journalism Studies. Nonetheless, some deficiencies and ethical transgressions persist, such as lack of multiple sourcing; dominant male voices; exposure of sexually assaulted children and those in conflict with the law; judgmental headlines; covering police statements on suspects, crime or death as if they were final; and the use of discriminatory and offensive words.⁶²

ii. *‘Declining’ number of ADR cases*

According to MCT reports, the Board and staff, and some of those consulted who were more aware of MCT’s ADR functions than others, MCT’s ADR processes are highly rated.⁶³ Compliance with agreements and decisions is reportedly very high (100% compliance from 2018-21 and 90% in 2022,⁶⁴ and 98% in 2023⁶⁵). Decisions are posted on the MCT website⁶⁶

⁶⁰ The link is made more explicit in the 2023-2027 Programme Strategy, which links ethics and ADR under Programme Objective 4 and which states the intended outcome as ‘To enhance ethical practice and conciliate between media and public thus ensuring media accountability, efficacy and credibility’.

⁶¹ See for example 2020 Annual Report, p. 22.

⁶² State of the Media in Tanzania, 2022-2023, pp. 102-3.

⁶³ Although only 11 external stakeholders could speak to MCT’s ADR services (the rest being more familiar with its work in advocacy and other areas) all rated the services highly – including one who had been a respondent in a complaint against his company that was successfully resolved in 30 minutes.

⁶⁴ 2023-2027 Programme Strategy, p. 12.

⁶⁵ 2023 Annual Report, p. 25.

⁶⁶ <https://mct.or.tz/media-cases/>

and social media⁶⁷. According to MCT staff, outcomes are covered by the media, especially those involving high-profile individuals,⁶⁸ and it is noted that the EACJ decision has been widely reported online.⁶⁹ In some cases, courts have even referred cases to MCT to use ADR to settle grievances.⁷⁰

MCT has provided public awareness of its services through public service advertising campaigns across regional and community media (although fewer adverts are currently aired in Dar es Salaam given the costs and limited available funding). Awareness is also created during visits to journalism schools to raise awareness of defamation, ethical issues, and how to bring such cases before it for mediation. However, although MCT has handled 221 complaints in the period 2010-2023, the number of cases has declined and only 47 were dealt with during the evaluation period.⁷¹ Possible reasons for the declining numbers mentioned during consultations were:

- While MCT's services were used in the past by high-ranking political figures prior to 2015 (including the former Vice President and Prime Minister), such high-profile complainants stopped relying on MCT under President Magufuli. Instead, government generally resorted to more extreme ways of dealing with reports they did not like since they did not want to be seen to be engaging or affiliating with NGOs. High profile cases like those brought by government generate significant public and media interest. Once government members and officials stopped using MCT, there was less coverage of MCT cases and reduced awareness amongst the population, although MCT continued to raise public awareness, promote its services through various channels, and to engage with the public, media stakeholders, and civil society to ensure that ethical standards and media accountability remained at the forefront of its mission.
- The Ethics Committee conducts visits to media stakeholders to share experience and challenges, raise awareness of ethical issues, and offer on-the-spot advice and guidance that may be helping to reduce the number of complaints reaching MCT.⁷²
- MCT confirmed that some editors and media owners have installed internal mechanisms to prevent arbitration cases as a result of MCT's requests and assistance.⁷³ Some of those listed in the footnote below have also updated or developed internal editorial policies and

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https://www.facebook.com/mediacounciltanzania/posts/4918202751599526/?utm_source=chatgpt.com

⁶⁸ When the media complies with an order to issue an apology or provide a right of reply, the relevant press clipping is attached to the relevant case file to officially mark the case as closed.

⁶⁹ See for example: <https://globalfreedomofexpression.columbia.edu/cases/media-council-of-tanzania-v-attorney-general/#:~:text=The%20Court%20found%20that%20the,on%20Human%20and%20Peoples'%20Rights.> And <https://africanlii.org/akn/aa-au/judgment/eacj/2020/40/eng@2020-06-09>

⁷⁰ Ibid.

⁷¹ Five in 2018; 12 complaints conciliated (10 at the secretariat level and two arbitrated by the Ethics Committee) in 2019; nine in 2020 and 2021, seven in 2022, three in 2023, and five in 2024, including one lodged by a government agency. (Figures supplied by MCT.)

⁷² See for example the 2020 Annual Report, p. 19.

⁷³ Mwananchi Communication Limited, New Habari Corporations, Shirika la magazeti ya serikali, Zanzibar Broadcasting Corporation, Chuchu FM Radio, Mwenge Community Radio, Mkoani Community Radio Pemba, Hits FM Radio, Uhuru Media, Pangani FM, Manyara FM, Azam Media, Times FM, Sunrise Radio (Arusha), Radio Maria and Femina Hip.

codes of conduct as part of self-regulation (with MCT support). That might mean that complaints are being dealt with successfully at that level and are not referred to MCT.

- MCT has trained some press clubs on ADR and these deal with similar complaints at local level. These figures are not tracked by MCT or included in MCT reports, but according to UTPC, 10 complaints were successfully resolved at local level in the period 2021-2023 that might otherwise have been lodged with MCT.⁷⁴
- Some aggrieved parties prefer to lodge their complaints with the Tanzania Communications Regulation Authority or to take the matter to court, since courts have the power to levy fines or order monetary compensation.⁷⁵
- Human rights organisations such as LHRC and THRDC also offer mediation services related to human rights violations by the media.
- Sida's funding included funds for public awareness of MCT's ADR services, including public service advertisements.⁷⁶ Some of these were aired for free (and continue to be aired) but some stations, particularly in Dar es Salaam, needed to be paid. When Sida funds were no longer available, it was not possible to continue those, which may have affected further public engagement.
- MCT staff address and avoid potential complaints by monitoring the media and providing feedback to improve quality and performance, often simply calling the relevant publication when defamatory or misleading stories are published, although records of these are not available.

Using the number of cases as an indicator is problematic though: while it might indicate a lack of trust in or awareness of MCT's ADR services, it might just as easily indicate that MCT's training and focus on ethics has reduced the number of complaints. Many of those familiar with MCT's ADR work also noted that MCT continued to provide ADR during the more difficult context of the Magufuli era, including during the 2020 General Election. ADR reportedly also saved smaller media houses that might have been crippled by cases brought against them by wealthy or powerful individuals. MCT's ADR role has also been formally recognised by government: in April 2024, the Government Spokesperson and Director of Information Services acknowledged MCT's significant role in ADR and emphasised the important role of MCT's efforts in promoting professionalism, ethics and accountability within the media in Tanzania.⁷⁷

Nonetheless, the apparent decline in cases referred to MCT does suggest that more needs to be done to raise awareness of its ADR service and function, particularly in the face of the apparently imminent creation of the state-controlled Independent Media Council envisaged by the MSA.

⁷⁴ According to available UTPC data, five cases were resolved in 2021 (two in Arusha, and one each in Kigoma, Mwanza, Pemba and Rukwa). Five were resolved in 2022 (three in Kilimanjaro and one each in Manyara and Arusha). And one was resolved in 2023 in Kigoma.

⁷⁵ The 2022 Annual Report notes that one complainant chose to withdraw his complaint on being informed that MCT does not make monetary awards. 2022 Annual Report, p. 35.

⁷⁶ For example, the 2022 Annual Report (p. 33) notes that 2,236 adverts on Council mediation and arbitration were aired on TBC 1, Clouds FM, TVE and Radio EFM, Sunrise Radio, Radio Upendo, Uyuvi FILMMAKERS Radio, Nyemo FM Radio, Devine Radio, Abood Media, Bunda FM Radio, ZBC TV and ZBC Radio, SUNET TV, Plus Radio, Mkoani Community Radio and Micheweni Community Radio.

⁷⁷ 2024 Semi-Annual Report, p. 28.

3.3.3 Other outcomes

i. Press freedom violations / safety of journalists

According to the 2018-2021 Programme Strategy, the objective of maintaining a Press Freedom Violations Register (PFVR) is to document, publish and follow up on press freedom violations so that media houses, journalists' associations and human rights defenders can use it as a tool, while authorities, societal stakeholders and the public are provided with empirical evidence of abuses. It thus aims to expose when and how violations happen, to reduce violations, and to contribute to safety of journalists, media houses and owners.

MCT maintained the PFVR over the entire evaluation period and used it to:

- Produce annual reports of violations, carry out investigations, make its findings public, and conduct campaigns to highlight journalist safety issues and garner public and institutional support for reforms.
- Inform advocacy efforts, strategic litigation, and in defence of litigation against the media.
- In capacity development activities (such as sensitisation seminars) to educate journalists and human rights defenders about their rights and mechanisms for responding to press violations.

Results are also shared during the Universal Period Review, with the UN Special Rapporteur on Freedom of Expression, with regional bodies such as the East African Press Council, and are used as a reference by media professionals, activists and researchers.

The outcome in the 2018-21 Programme was expanded in the 2023-27 Programme Strategy to increase the focus and linkages between the register and safety of journalists.⁷⁸ Activities in this area have primarily been supported by IMS under the Enhancing Media Freedom, Journalists' Safety and Security in Tanzania project (2023 – 2024). Safety of journalists reportedly increased after President Samia assumed office, primarily given her far more liberal approach to the media than her predecessor. Tanzania also improved significantly on the Reporters Without Borders World Press Freedom Index after President Samia assumed office, rising from 143rd in 2023 to 97th of the 180 countries covered by the index in 2024.⁷⁹ The number of journalists being censured for their work in Tanzania also declined: according to MCT, 17 'press violations' (including threats, arrests, denial of access to information, banning and fining of media houses, and equipment seizures) were recorded during 2023 compared to 25 in 2021 and 41 in 2020.⁸⁰ A separate comparison of journalists' safety from March 2021 to 2023 also showed significant improvements, with a decline in the number of attacks on journalists and freedom of expression violations.⁸¹

⁷⁸ The outcome in the later strategy reads: 'To enhance press freedom and journalists' safety and security through networking, capacity building, documenting and publishing and following up on press freedom violations so that media practitioners and human rights defenders are provided with empirical evidence and can use it as a tool.'

⁷⁹ <https://rsf.org/en/country/tanzania>

⁸⁰ 2023-2027 Programme Strategy, p. 19; 'Hopes rise for press freedom in Tanzania as number of censored journalists falls', The Guardian, 9 January 2023, Internet: <https://www.theguardian.com/global-development/2023/jan/09/tanzania-press-freedom-violations-president-suluhu>.

⁸¹ 'Safety of Journalists in Tanzania', African Freedom of Expression Exchange, 2023, p. 3.

Although attributing such an increase to any one organisation is obviously difficult and it coincides with President Samia's easing of restrictions on the media, it can safely be assumed that MCT contributed in some way given the large number of members it has from across the country that includes all types of role-players. Concerns were raised during interviews though that the space for the media can be expected to close as the election approaches, with risks for journalists expected to rise over the coming months.

ii. Media monitoring

The objective of media monitoring is to ensure media is proactively monitored and given feedback to improve quality and performance so that the media can sustainably and effectively fulfil its roles.⁸² Monitoring includes a special focus on media freedom during elections, gender equality and inclusiveness in the media, and, more recently, on misinformation and disinformation trends.

Media monitoring also aims to assess trends in professional and ethical standards and provides MCT with data for designing its interventions based on actual needs. It also provides media houses and journalists with information on how to improve their quality and services to the public.⁸³ Results of media monitoring are included in MCT's Yearbook of Media Quality and biennial State of the Media Report. State of the Media reports were generally well regarded by key informants during the evaluation, although some of those consulted believed the latest version (2022-23) needed to include a more rigorous methodology and that it would be useful if the report were more interactive. Nonetheless, even those informants agreed that the report is important because it triggers conversations and debates amongst stakeholders.

The **Excellence in Journalism Awards Tanzania (EJAT)** are also included under the media monitoring outcome and were very highly rated by all of those consulted. MCT has been able to sustain the EJAT for 15 consecutive years and has steadily increased the number of categories.⁸⁴ According to the 2023-27 Programme Strategy, EJAT has built the confidence of women journalists and young journalists⁸⁵ and has helped build confidence of rural based reporters and small media outlets in far-flung districts.⁸⁶ During 2022, categories began recognising emerging areas like digital storytelling and multimedia reporting. According to those consulted, the EJAT has incentivised quality reporting by recognising outstanding contributions to journalism and there is significant public interest in the awards – raising the profile of both journalists and MCT.

iii. Sida's contribution to other outcomes

Although core support stopped from 2018 onwards, Sida's contribution to salaries and operational and administrative costs allowed MCT to focus on all outcomes, including those funded by other donors that do not always cover such costs.

3.3.4 What contributed to results and who benefitted?

The fact that MCT was created by the media means that it is media owned. Its broad membership and network give MCT considerable comparative advantage over other media organisations and increased leverage for engaging with government. It has existed for decades,

⁸² 2018-2021 Programme Strategy, p. 19.

⁸³ <https://mct.or.tz/media-monitoring/>

⁸⁴ 2023-2027 Programme Strategy, p. 15.

⁸⁵ As is attested to by the number of women and youth participating, being nominated, and winning awards.

⁸⁶ 2023-2027 Programme Strategy, p. 15.

has proved its longevity and staying power, and is seen as a trusted partner. It managed to survive the period of repression under President Magufuli, which showed its resilience, ability to negotiate the difficult context, and further increased its reputation and levels of trust.

MCT has impressive convening power and, together with TAMWA and MISA-TAN, drove the creation of CoRI and has collaborated with most media role players and stakeholders over the years, including in the celebration of special days for the media and in other partnerships. Its relationship with THRDC and LHRC enabled it to bring a successful challenge to the MSA in the EACJ but also provided support to journalists and media houses during the clampdown on media freedom and journalists during the Magufuli era.

MCT has also actively engaged with government in a constructive manner, even during more oppressive times. Membership includes government organisations and government officials are included in training and other activities. The fact that it has people from different sectors on its Board, including Judges and senior journalists, has also contributed to its ability to engage effectively with government.

MCT also has an impressive network of international and regional partners that provide encouragement, assistance and advice. It was granted observer status by the African Commission on Human and People's Rights in 2020 and was at the forefront of the formation of the East Africa Press Council (EAPC), which launched its strategy in Kigali on 24 June 2024.⁸⁷ It is also a prominent member of the World Association of Press Councils, where it has often been on the Executive Board. MCT's Executive Secretary was also elected as the first Chairperson of the Network for Independent Media Councils in Africa in May 2024 and MCT hosts its Secretariat.⁸⁸ It is highly respected in the region and has been able to use its track record and international reputation to garner support for media freedom from beyond Tanzania.

Beneficiaries of MCT's support include almost the entire media sector in Tanzania and Zanzibar: journalists, media owners and houses, editors, women journalists, journalism students (particularly at colleges), government media, and members of the public.

3.3.5 Flexibility

MCT showed good flexibility and adaptability during the evaluation period. It was able to adapt its advocacy approach during the Magufuli era, which succeeded in keeping the door open for continuing engagement with government despite the repression. In response to challenges in the context, MCT also began to work more in coalitions and partnerships to shield the council and its members from possible government reprisals, used the courts in Tanzania and the EACJ,

⁸⁷ The concept of establishing an East African regional body for media councils was first discussed in 2019. Leaders from media councils in Kenya, Rwanda, Tanzania (MCT) and Uganda met in Kisumu, Kenya, and later formalized the decision to create the East African Media Councils Association (EAPC). MCT's Executive Secretary was appointed as the interim chairperson in 2019 and retains the chair until the next election. The EAPC was formally launched in Arusha in 2023 with representatives from media councils across East Africa. It aims to bolster independent media regulatory bodies, promote self-regulation, and enhance media accountability in the region. (<https://eastafriapc.org/>).

⁸⁸ The Network of Independent Media Councils in Africa is made up of 13 councils from East, West and Southern Africa and aims to bring together independent media content regulators from around the continent, to convene regularly to discuss the strengthening of media freedom, ethics and public accountability. (<https://sanef.org.za/african-media-councils-form-a-pan-african-network-for-self-regulatory-bodies/>)

and increased efforts to provide training and ethical oversight as a way of keeping government censors at bay. It has also used its experience under previous strategies to understand what has worked or not worked in the past and to adapt its approaches.⁸⁹

As dealt with in Section 3.1.2 above, the one area where criticism was received during the evaluation was the perceived slowness to adapt to new forms of media such as social media and citizen journalism despite attempts to be more inclusive. But lessons prior to 2024 have been learned and, under its new management structure, MCT is exploring ways to engage non-traditional forms of media better in the coming years.

3.4 GENDER EQUALITY AND THE HUMAN RIGHTS-BASED APPROACH (HRBA)

Evaluation Questions – Gender Equality and the HRBA

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| 9. Were gender equality and the HRBA integrated into the design and implementation of the programme, and what results did this lead or contribute to? |
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3.4.1 Gender equality

Gender representation within MCT is good. According to the latest available semi-annual report, of the 16 full-time MCT staff during 2024, 50% are women, including 60% of the management team.⁹⁰ Within the finance and administration department, 44% of staff are women, women make up 33% of the programme team, and the entire Zanzibar office staff are women.⁹¹

In addition to specific activities such as developing and promoting policies and sensitisation, gender equality was mainstreamed into MCT activities and outcomes under the 2018-21 Programme Strategy, including in training curriculum development and media monitoring. In line with the strategy, and in partnership with TAMWA and MISA-TAN, MCT implemented a Women in the Media project during the evaluation period, directly funded by Vikes with some support from Sida given the flexibility of Sida funding, and Wellspring via their core support to MCT. The project started in 2019, runs to 2025, and aims to tackle both aspects of gender equality in the media – gender representation within media houses and organisations, and the way in which gender-related issues are dealt with by and in the media. Under the project, MCT designed a model Gender in the Media Policy which has been promoted at 26 media outlets, Vikes supported mentoring of 15 women journalists, Sida supported mentoring of 30 women journalists, and Sida and Vikes contributed to media management training for at least 70 senior women journalists. The MCT Gender in the Media Training Manual was also revised and published and is being used by at least 12 journalism colleges.⁹² Although Vikes funded the policies, studies and training manual directly, Sida funds were also used for salaries and similar expenses that contributed to all.

⁸⁹ 2023-2027 Programme Strategy, p. 7.

⁹⁰ 2024 Semi-Annual Report, p. 32.

⁹¹ Ibid.

⁹² 2023-2027 Programme Strategy, p. 14.

MCT also conducted sensitisation seminars for media managers and assisted the Corporation of Government Newspapers to adopt a gender policy and establish a gender desk, while efforts to support a gender desk at The Guardian Limited continues.⁹³ The EJAT has also prominently featured female journalists among winners. For example, the 14th edition of EJAT (2022) included 60 women journalists amongst the 114 winners.⁹⁴ The training curriculum developed with NACTE also includes a module on gender equality and social inclusion. But while most of those consulted agreed that MCT had focused sufficiently on gender equality, Tanzania remains a highly patriarchal society and changing attitudes and behaviour and increasing levels of gender equality remain a challenge. Women journalists continue to be under-represented in media hierarchies and media content is still not adequately gender sensitive and transformative.⁹⁵

Finally, it was noted in consultations with various women's rights organisations that, while MCT has partnered with many of these to enhance gender equality, women's rights NGOs continue to conduct media-focused activities independently of each other and in an uncoordinated fashion.

3.4.2 HRBA

Sida uses the Participation; Link to human rights obligations; Accountability; Non-discrimination and equality; Empowerment and capacity development; and Transparency (PLANET) tool when considering whether the HRBA has been applied in practice. MCT's compliance with PLANET is good:

- **Participation:** MCT membership is open to all members of the media and participation is excellent, with around 250 members across the Mainland and Zanzibar. MCT engages regularly with media stakeholders and major human rights NGOs in the country. It consults MCT members, CoRI members and others in preparing strategies and approaches and takes suggestions on board.
- **Link to human rights obligations:** One of MCT's primary purposes is to increase compliance with internationally recognised rights included in the Constitution. MCT participated in the webinar on Strengthening Civil Society Engagement in the Universal Periodic Review to advance Freedom of Expression during 2022.⁹⁶ And according to OHCHR, MCT's assessments of media freedom and the EACJ ruling have informed the Universal Periodic Review process.
- **Accountability.**⁹⁷ MCT provides a mechanism for resolving complaints, including those brought by government against the media, and provides training to and collaborates with private and government owned media and civil society. MCT membership is open to all members of the media – including government newspapers –and it has actively engaged government to promote media freedom and raise awareness of issues facing the media.
- **Non-discrimination and equality:** MCT has a strong focus on the needs of rights holders as well as the underlying causes for why those rights are not realised. It has put in place internal policies such as safeguarding policies and specifically targeted gender equality and the rights of vulnerable group. It thus complies with this aspect of the definition.

⁹³ 2023 Annual Report, p. 32.

⁹⁴ Ibid, p. 6.

⁹⁵ 2023-2027 Programme Strategy, p. 23.

⁹⁶ 2022 Annual Report, p. 58.

⁹⁷ 'Accountability' considers the extent to which Sida programmes target both rights holders (citizens) and duty bearers (government) and whether there are mechanisms for participation and complaints in place for rights holders, civil society and other stakeholders to hold duty bearers to account.

- Empowerment and capacity development: MCT actively seeks to build the capacity of the media to claim its rights and enhance its compliance with ethical standards to avoid violating the rights of rights holders. It also engages other relevant stakeholders to contribute to positive outcomes.
- Transparency: MCT has a website, engages with members in Annual General Meetings, produces publicly available annual and other reports, and engages with members of the media and other stakeholders individually and via CoRI. Levels of transparency are thus generally good. Some dissatisfaction was recorded though amongst some members of CoRI who noted that the CoRI memorandum of understanding (MoU) has yet to be agreed and finalised after many years, there is no strategic plan, there is a lack of transparency on the process to develop the plan and MoU, and that MCT plays too dominant a role. These issues were under discussion within CoRI during the on-site mission and progress was reportedly being made.

3.5 IMPACT

Evaluation Questions -- Impact

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| 10. Has Sida support to the programme generated significant positive or negative, intended, or unintended, high-level effects and contributed to the overall impact of the programme? |
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Impact indicators in MCT's Programme Strategy 2019-21 are:

- Media friendly legislation in place (access to information legislation, press freedom, and other laws and regulations).
- Status of press freedom violations shows a decrease in violations.
- Self-regulation of media defended and enhanced.
- Reporting according to ethical norms and the quality of media increase over time.

Despite the challenges in the context, some impact and potential for impact is noted with MCT's advocacy. Although the more contentious provisions remain, some amendments to the MSA have been made, which, in the Tanzanian context, is a success. Advocacy efforts related to the MSA and other legislation and policy also have more potential for success under the current administration. But while it is true that advocacy on various laws and policies has raised awareness of challenges in the regulatory framework amongst the public, members of the media and journalism students, and while it is understood that convincing the Tanzania government to make any changes is challenging in the context, the fact remains that most restrictive laws remain in place despite MCT's and other media and civil society organisations' best efforts. Most of the legislation Nyalali Commission identified as unconstitutional in 1991 remains in place or has been incorporated into legislation like the MSA.

MCT and its members have vigorously defended, and continue to play a key role, in self-regulation. Despite these efforts, the MSA still includes a statutory regulatory body, the Minister for Information, Communication and Information Technology has established the Journalists Accreditation Board and has signalled the intention to establish the IMC once the Board is in place. As further dealt with in Section 3.6.3 below, the EACJ found that some of the MSA provisions related to the Accreditation Board violated the Treaty for the Establishment of the East African Community and need to be revised. Since establishing the IMC appears to require the Accreditation Board to be in place, it may be that the process to establish the IMC will be delayed. In any event, MCT will still have a role in self-regulation (as discussed in Section 3.6 below) and has successfully defended its position in that regard during the evaluation period.

MCT's ADR function has the potential to contribute to a more professional and ethical media. MCT also successfully lobbied the National Council for Technical and Vocational Education

and Training to develop and adopt a standard curriculum for journalism colleges, which has the potential to improve the quality and ethics of journalists in future. But while it may have improved since, the State of Journalism Reporting in Tanzania 2022 notes that some areas continue to require further effort. In particular, the report notes that there are still too few opinion pieces and hardly any media pieces showing opposing viewpoints.⁹⁸ The 2022-3 State of the Media Report also noted that the standard of media professionalism remained a challenge and contributed to the poor quality of media content.⁹⁹ Respondents attributed this shortcoming to inadequate skills, substandard academic qualifications, and relatively low remuneration, much of which is beyond MCT's control.¹⁰⁰ Some of those consulted during the current evaluation also noted that the self-censorship that the media engaged in during the Magufuli era continues despite the increased opening of space for the media.

MCT, via its collaboration with LHRC and THRDC in CoRI, was able to assist members of the media during the worst periods of repression. MCT's tracking of press violations shows a decrease in these since 2021 and Tanzania's position on the World Press Freedom Index has increased considerably (see Section 3.3.3). Although the reduction in violations is driven in part by external factors – notably President Samia's administration's more liberal attitude to the media – MCT's focus on the issue provided valuable information to government on the type and frequency of violations that needed to be addressed.

Determining Sida's contribution to the overall impact level in MCT's results frameworks and the reconstructed theory of change is difficult given that the evaluation primarily focused on two of the four outcomes and three of the impact indicators relate more to outcomes that Sida did not directly support. Nevertheless, results under the two outcomes targeted by Sida have contributed to or have the potential to contribute to impact in future. Sida funding of salaries and administrative costs can also reasonably be expected to have contributed to outcomes and impact in other areas, although the evaluation team's ability to measure this is limited by the focus in the ToR on only two of the four MCT outcomes.

3.6 SUSTAINABILITY

Evaluation Questions – Sustainability

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| 11. Will the net benefits of the programme continue, or are likely to continue, why / why not, and who is likely to continue to benefit? |
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3.6.1 Sustainability of results

MCT has focused on both individual and organisational development over many years, which contributes to the potential for results to be sustained. Although supporting individuals to be better journalists, editors, owners and managers helps to ensure that results will be sustained while they remain in their positions, building organisations helps to ensure that new members of the profession will benefit from strengthened organisations that they join as older members depart.

Individual journalists, media managers and others that MCT has trained will be better informed and qualified to perform their roles even if MCT were to cease to exist. Some have also been trained as trainers. And it has focused on support to media organisations and institutions, media

⁹⁸ State of Journalism Reporting in Tanzania 2022, p. iv.

⁹⁹ Page 78.

¹⁰⁰ Ibid.

houses and journalism colleges. While falling outside the evaluation period, MCT helped to establish two key organisations that remain in place: Tanzania Editors Forum (officially registered as an independent organisation in 2009) and UTPC (nurtured by MCT until 2011). MCT also contributed directly or via UTPC to the establishment of regional press clubs that continue to exist. And while CoRI is not the subject of this evaluation, it is likely that CoRI, established by MCT and two other organisations, will continue to exist given that it has grown to 17 members, and costs of running meetings etc. are low.

Changes to law and policy, although not complete, also have the potential to enhance sustainability of benefits since laws and policies improved as a result of advocacy will continue to benefit the media for years to come. However, MCT faces two significant challenges in the immediate future that might negatively impact sustainability: the funding gap once Sida funding comes to an end, and the looming establishment of the Independent Media Council.

3.6.2 Funding gap

Sida has been MCT's biggest funder over the years and the Embassy's decision not to enter into a new agreement with MCT after December 2024 has the potential to undermine its ability to function at the same level as in previous years. MCT is very aware of the need to address the funding gap and is taking active steps to do so – including by securing its own premises to reduce dependence on donors (although it lacked funds to finalise the new building during 2024) and actively seeking out new donors. A programme officer has also been appointed to focus on fundraising. And while Sida's support to MCT will end and Sweden's new strategy for Tanzania is still to be finalised, it is possible that the Embassy will continue to fund organisations like UTPC, LHRC, JamiiForums and THRDC that will continue to provide some level of support to media freedom, freedom of expression and the safety of journalists in future, complementing MCT's support to the sector. MCT has developed strong collaborative relationships with all of these organisations over the years that have collectively contributed to advancing media freedom, freedom of expression, and the safety of journalists and can be expected to do so in future.

The funding environment faces its own challenges, though, as many European development partners divert funding to address crises such as Russia's war on Ukraine, ongoing conflicts in the Middle East, and the increasingly complex migration context.¹⁰¹ President Trump's 20 January 2025 Executive Order has paused all United States development assistance, and all development assistance will be reviewed by the new Trump administration to align with the President's foreign policy with potentially dire consequences.¹⁰² In the meantime, the new US administration is actively dismantling USAID and it appears that future US development assistance may be significantly reduced. To attempt to contribute to MCT's fundraising efforts, recommendations for joint projects are made below that might help to address such challenges and the widening funding gap.

3.6.3 Impact of the Independent Media Council

The MSA envisages an 'Independent Media Council' (IMC) in Part IV that will, if and when established, have some similar functions to MCT:

- Setting a code of ethics for journalist professionals.
- Promoting ethical and professional standard amongst journalists and media enterprises.

¹⁰¹ <https://www.theguardian.com/global-development/2025/jan/23/global-development-economics-donor-spending-refugee-oecd-world-bank-peak-aid>

¹⁰² <https://www.whitehouse.gov/presidential-actions/2025/01/reevaluating-and-realigning-united-states-foreign-aid/>

- Conducting reviews on the performance of the media sector.
- Determining print media content complaints.

Although the EACJ was not asked to rule on whether the IMC violates the East African Community Treaty in the MCT, LHRC and THRDC challenge to the MSA, it was asked to deal with the Accreditation Board envisaged by Part III of the MSA. The Court held, *inter alia*, that the establishment of an Accreditation Board with the functions and powers in Section 13 and 14 of the MFA does not in itself violate the Treaty. However, it found that Section 19 (which states that no one may practice as a journalist unless they have been accredited by the Board and that the Board may cancel the accreditation if the journalist has committed gross professional misconduct) violates the Treaty since it is very broad given the definition of ‘journalist’ in Section 3 of the Act. Since Section 20 (which states all accredited journalists will be provided with a press card) and Section 21 (which states that a person who has ceased to be or is suspended as an accredited journalist cannot practice as a journalist) flow from Section 19, these too violate the Treaty. The EACJ then ordered that Tanzania should take necessary measures for the MSA to comply with the EAC Treaty. While government has amended nine sections of the MSA, the impugned Sections related to the Accreditation Board have not been amended. Despite this, the Minister of Information, Communication and Information Technology appointed the Accreditation Board with six members on 18 September 2024. The planned inauguration, scheduled for November 2024, had not yet taken place by January 2025, presumably following the intervention of CoRI (and the MCT Executive Secretary) that met with the Minister on 19 November 2024 and beyond.

The issues related to the establishment of the Accreditation Board have a direct bearing on the IMC, since only accredited journalists may be IMC members¹⁰³ and the IMC only has jurisdiction over accredited journalists. So, if there is no Accreditation Board, the IMC cannot be established. MCT’s position in relation to the Accreditation Board and the IMC is also not yet certain. The Executive Secretary reported that he had attempted to raise it with members during the September Annual General Meeting but was not able to since some members would prefer to wait to see how the IMC operates in practice.

But while the IMC might appear to be an existential threat for MCT, all of those consulted still see a role for MCT even if it is established. The IMC will only have the power to determine print media complaints (presumably so as not to overlap with the Tanzania Communications Regulatory Authority) while MCT can deal with complaints related to all forms of media. Top-down ‘ethics codes’ developed by state regulatory bodies such as the IMC are invariably a form of censorship, regarding any form of criticism of government as unethical. The Code of Ethics envisaged by the MSA will also only apply to the print media, print media houses and accredited journalists under the Act. MCT’s Code of Ethics for Media Professionals was developed by members of the media themselves, applies to all forms of media, is regularly updated, is more likely to be adhered to, and can continue to provide a more rights-based approach to media ethics even if an IMC code is developed.

The MSA does not empower the IMC to advocate for changes to restrictive laws or to litigate against the state. Indeed, no state institution can be expected to advocate for changes to laws developed by the state or to bring strategic litigation against the state, and so the need for MCT advocacy and strategic litigation on behalf of the media, alone or with others, remains. As new journalists and new forms of journalism and media emerge, there will be a constant need for

¹⁰³ MSA, Section 25(1).

training on ethics, skills, reporting, investigation, gender equality and so on for all members of the media. The IMC will not have that role and would not be able to provide it in partnership with MCT's network even if it did. And while the IMC is expected to conduct reviews of the media sector, MCT has established itself in that role and provides highly regarded, independent State of the Media and Media Quality Reports. The IMC will be unable to compete with MCT's independent reports, its reports will not be trusted as independent, and MCT's reports will continue to have value within Tanzania and beyond. MCT will also continue to promote the concept and practice of self-regulation within media houses (which will help to reduce complaints to the IMC), to promote the DEFIR, and to provide advisory services to its members and stakeholders.

Finally, even if the IMC is established, a 'middle ground' could be found where both MCT and the IMC co-exist in complaint resolution, allowing anyone aggrieved by a story to choose the body they trust and that best suits their needs. It might also be possible for someone to use MCT's mediation and arbitration services and then take the matter to the IMC if they are not satisfied. Since submission of the draft version of this report, the Executive Secretary has discussed the matter with the Ethics Committee to identify the pros and cons of the IMC and raised it with the MCT Board in January 2025. The MCT Board has agreed that, while advocacy work continues, MCT will co-exist and take advantage of the co-existence of the IMC to perform its roles.¹⁰⁴

¹⁰⁴ MCT comments to draft report, 11 February 2025.

4 Evaluative Conclusions

4.1 RELEVANCE

MCT's 2018-2021 Programme Strategy on which its agreement with Sida is based was aligned with relevant Swedish strategies for Tanzania and the region at the start of the programme. It sought to protect and enhance relevant rights for the media in the Constitution and to address laws and policies that infringed on such rights. MCT is media-owned, made up of most members of the Tanzanian media, has been in existence for close to three decades, and clearly reflects the views and concerns of most members of the media as determined by the context. Its concerns, approach, activities, and focus are thus those of the media and its programme, and Sida's support to it, were thus relevant to the context and the needs of the media at the start of the evaluation period. MCT's 2023-2027 Programme Strategy revised its approach slightly to address issues in the context at the time, including an increased focus on safety of journalists, enhancing ethical standards and professionalism, and increased use of strategic litigation in Tanzania and the EACJ as part of its advocacy approach. Although some of those consulted noted that more needed to be done, MCT also began to try to address the rise in online media and citizen journalism and to bring practitioners into its self-regulatory fold. MCT, and Sida's support, thus remained relevant over time.

4.2 COHERENCE

The Embassy's portfolio of human rights and democracy organisations, including those focused on the media (MCT, UTPC and JamiiForums) and those focused on protecting human rights and providing access to justice (LHRC and THRDC) was very internally coherent given the context at the start of the evaluation period. It remained internally coherent even when space for the media and civil society and violations of rights diminished under President Samia. Although these and other organisations have coordinated mainly through CoRI – a homegrown coordination mechanism – Sida's support to them contributed to their, and CoRI's, coordination. Through CoRI, and with Sida support, human rights organisations were able to protect the rights of journalists and the media and to bring strategic litigation against repressive legislation and policy within Tanzania and in the EACJ. Although JamiiForums is not a member of MCT, coherence with MCT was enhanced, with MCT leading advocacy around media freedom and JamiiForums leading advocacy around digital rights and the media. Coordination between MCT donors, while complicated by the fact that its donors are not all represented in Tanzania, is nonetheless sub-optimal and some potential for overlap and missed opportunities was noted, particularly in the areas of gender equality in the media and advocacy.

4.3 EFFECTIVENESS

MCT has advocated for media freedom and rights and changes to restrictive legislation and policy in its own name and via CoRI. Advocacy related to the main legislation – the MSA – continued throughout the evaluation period, included strategic litigation in Tanzania and the EACJ, and continues into 2025. MCT also led the formation of the East Africa Press Councils and partners with organisations such as the World Association of Press Councils to broaden advocacy efforts across the region. Success in advocating for a standardised curriculum for journalism schools is noted and progress is being made with lobbying for the review of the

Information and Broadcasting Policy 2003 and legislation for the media in Zanzibar, although key changes and new legislation have yet to reach finality.

MCT has used strategic litigation effectively, although some cases have yet to be finalised, and government has only partially complied with the ruling of the EACJ on the MSA. Media owners and organisations support MCT initiatives to influence political processes, its advocacy efforts have been widely reported in the media, and journalism colleges consulted during the evaluation confirmed that they use advocacy work in their teachings on media law. But the current administration may be more supportive of MCT's and CoRI's positions and some amendments have been achieved, some continue to resist MCT's advocacy efforts.

MCT's ADR functions aim to enhance ethical and accountable media by resolving complaints brought against media outlets in a cost-effective and timely manner and providing opportunities for the media to learn from its mistakes. It complements other MCT activities to enhance ethical standards such as the Code of Ethics for Media Professionals and Ethics Committee visits to media houses, workshops and seminars for journalists and editors, training for new journalists, and public awareness campaigns. According to available evidence, MCT's ADR processes are highly rated and compliance with decisions is good. A decline in the number of complaints reaching MCT is noted, possibly because some are resolved by press clubs at local level, less visibility because high-profile government officials stopped using MCT during the Magufuli era, and a possible increase in ethical standards following MCT's decades-long focus on ethical reporting. Given funding constraints, less public awareness of its services has been conducted, which may also contribute to the decline in cases.

Although not directly supported by Sida, and initially excluded from the evaluation by the ToR, Sida's funding has been used to support other outcomes indirectly by contributing to salaries and administrative costs that other donors do not always include. MCT has maintained its press freedom violations register that has provided valuable information on the prevalence and type of violations that have fed into its reports and advocacy efforts. Data has also been shared during the Universal Period Review, with the UN Special Rapporteur on Freedom of Expression, with regional bodies, and are used as a reference by media professionals, activists and researchers. Safety of journalists was protected as far as possible during the Magufuli era and has increased under President Samia and the number of media violations decreased post-2021. MCT has also continued to monitor the media, used results to focus its support, and given feedback via reports to improve media quality and performance. It has successfully implemented its Excellence in Journalism Awards Tanzania (EJAT) during the evaluation period, expanding the number of categories and awards to recognise digital media and encourage and support women and young journalists to aspire to excellence.

4.4 GENDER EQUALITY AND THE HRBA

Gender representation within MCT is good. MCT has supported gender equality through direct activities, co-funded or indirectly supported by Sida, and indirectly by mainstreaming gender equality into other activities. It has focused both on gender representation within media houses and outlets and better reporting on gender-related issues by the media. It developed and implemented a Women in Media project, contributed to development of gender equality policies and training, and has helped (and continues to help) media houses to establish gender desks. EJAT has increasingly sought to support women journalists and women achieved more awards than men in 2022. The training curriculum for journalism schools also includes a module on gender equality. But while MCT's focus has been good, Tanzania remains a deeply patriarchal country and changing attitudes and behaviour and increasing levels of gender equality is an ongoing struggle. Women's rights NGOs continue to conduct media-focused activities independently of each other and in an uncoordinated fashion.

MCT's compliance with the HRBA is good and it satisfies all of Sida's PLANET tool definitions of the HRBA. Since MCT is membership-based and cooperates with various human rights organisations via CoRI, participation is good. It has a strong focus on human rights compliance and has contributed to UN processes to protect rights. It is accountable to its members and provides an avenue for disputes between rights holders and duty bearers to be resolved. It does not discriminate and actively seeks to enhance women's rights. It provides empowerment and capacity development to a range of stakeholders and is transparent in its operations.

4.5 IMPACT

Achieving impact via advocacy in Tanzania is challenging given the ruling parties grip on power since independence and its unwillingness to bend to the will of advocates. As a result, while the MSA has been partly amended and ongoing advocacy may lead to changes in law and policy, most of the restrictive legislation the Nyalali Commission identified in 1991 remains in place or has been incorporated into legislation like the MSA. While MCT has vigorously defended and promoted self-regulation, government appears to remain committed to implementing the MSA and establishing a statutory body to regulate the media.

MCT's ADR function and support to a standardised curriculum for aspiring journalists has the potential to contribute to ethical reporting and professionalism, but MCT reports suggest challenges remain – some of which are beyond MCT's control. The self-censorship that journalists and media outlets resorted to during the Magufuli era appears to continue. At the same time, MCT's focus on safety of journalists, often with the support of human rights organisations, can safely be assumed to have contributed to a reduction in media freedom violations and Tanzania's improvement on the World Press Freedom Index. Although the Embassy only directly supported two of MCT's four outcomes, its contributions to salaries and administrative costs was reported to have assisted MCT to implement activities under other outcomes and Sida has thus contributed to MCT's impact.

4.6 SUSTAINABILITY

The potential for sustainability of results is enhanced by MCT's focus on individual and organisational strengthening and development. Changes to laws and policies, while not finalised, also have the potential to contribute to media freedom in future. Nonetheless, MCT has experienced a funding gap as Sida funding decreased and came to an end in December 2024. Steps have been and continue to be taken to address the gap, but challenges remain as European donors shift their focus to crises in Ukraine and the Middle East and United States funding is expected to develop under President Trump.

Government is also starting the process to establish the IMC envisaged by the MSA. It established the Journalists Accreditation Board during the current evaluation as a precursor to establishing the IMC establishment, despite the findings of the EACJ that some sections of the MSA related to the Accreditation Board violate the East African Community Treaty. But even though the IMC will have some functions that appear to overlap with MCT functions, all of those consulted see a role for MCT even if the IMC is established. MCT has a mandate from members of the media to advocate on the media's behalf of the media for changes to law and policy – which a state institution is highly unlikely to do. MCT also has the ability to use strategic litigation – alone or with others – to bring about changes to media law and policy, whereas a state regulatory body is highly unlikely to bring legal challenges against the government. The need for MCT training will remain. MCT's media monitoring and reports will retain a credible and independent voice. And even if the IMC is established, there are still prospects for MCT to provide complaint resolution services.

5 Recommendations

5.1 RECOMMENDATION FOR SIDA / THE EMBASSY

3. If possible under the new Swedish strategy for Tanzania, the Embassy should continue to fund organisations like UTPC and JamiiForums to advance media freedom and freedom of expression, and organisations like LHRC and THRDC to provide legal support and assistance to journalists despite the end of MCT funding.
4. The Embassy should continue to identify regional and global Sida programmes that might include support to MCT in future and assist MCT to engage with implementers of such programmes for MCT inclusion under them.

5.2 RECOMMENDATIONS FOR MCT

1. To address the probable establishment of the IMC, MCT should focus on its strengths and the things that make it unique, including its free ADR services. It should enhance public awareness of its roles and functions and increase understanding amongst citizens and donors that it is a better option than the IMC in areas where it has unique functions (such as promoting self-regulation) and strengths.
2. To enhance understanding of its ADR role amongst donors and better illustrate the important role it provides, MCT should work with UTPC to develop its monitoring systems to better reflect complaints press clubs resolve with MCT support and should keep a record of all informal efforts it makes to prevent defamatory or unfair and unethical reporting by the media.
3. To enhance advocacy efforts, MCT should consider developing a comprehensive advocacy strategy and encourage similar media and human rights focused organisations to adopt or contribute to the strategy.
4. Although public awareness can be expensive, MCT has already secured agreements with some stations to air adverts for free and other no- or low-cost options should be explored – including by developing joint public awareness fundraising proposals with other organisations, and consulting with other media organisations and CSOs to include information on MCT's ADR functions and how to access them in public awareness publications they produce and activities they conduct.
5. MCT should do more to explain to digital media and citizen journalists that the more willing they are to submit to self-regulation, the better chance they have of avoiding over-regulation by government. By joining the MCT fold, they will also gain protection from MCT and its vast network and bolster MCT's membership and resilience.
6. CoRI provides MCT with an excellent network to advocate for change, launch strategic litigation, and enhance safety of journalists. MCT needs to consider some of the criticisms coming from within the coalition and focus efforts on finalising the CoRI strategic plan, MoU and Communication Strategy that have been shared with CoRI members for approval during the first quarter of 2025.

7. MCT should consider strengthening and publicising its succession mechanism or strategy to avoid the lengthy process to appoint the current Executive Secretary and to allay concerns that the process is not sufficiently transparent.
8. MCT should investigate the possibility of developing a joint programme and strategic plan with like-minded organisations to deliver a comprehensive and coordinated programme on women and the media.
9. A similar joint programme with other MCT and CoRI partners on internet governance should be considered to that on gender equality in the bullet point above.
10. In addition to seeking out new sources of funding, MCT should consider mechanisms for coordinating its existing and new donors. For example, it could hold joint monthly or six-monthly meetings with donors to share progress, highlight new ideas, and see whether any existing donor is prepared to fund new ideas.

Annex 1 – Terms of Reference



Template version: 2022-03-02

Terms of Reference for the Evaluation of Media Council of Tanzania (MCT)

End Term evaluation of MCT program support 2018 – 2024

Country – Tanzania

Sector - Media

Date: - 2024.06.26

1. General information

1.1 Introduction

The Media Council of Tanzania (MCT) is an independent, voluntary, self-regulatory body established on June 30, 1995, and began operations in 1997 when it was officially registered under the Societies Ordinance of 1954 with the objective of promoting freedom of the media and ensuring highest professional media standards and accountability in the country.

The organization emerged because of the demand manifested by the growing media sector in Tanzania that lacked ethical standards in reporting, complain mechanisms and trainings of human resources at media houses.

Initially the Council focused on checking ethical lapses in the media. Through its Ethics Committee, it mediated complaints raised by the public against the media.

Gradually its activities increased to include training on ethics and professionalism to fill the yawning gap of trained practitioners in the bloated media industry. It is important to note the proliferation of media outlets did not match with the qualified practitioners available.

Though media is not a union matter, the Council has an office in Zanzibar which coordinates and follows development of the media in the Isles. It is important to

note here that most of the newspapers which are printed on the mainland are also read in the Isles and this is also the case for television and radio.

or over two decades, MCT has had a fruitful partnership with Sida represented by the Embassy of Sweden in Tanzania. With Sida, MCT seem to have worked in collaboration with other actors in strengthening Human Rights, in particular the Right to Information, Press Freedom and Democratic Governance. Sida's support has enabled MCT to fulfill its mandate of promoting freedom of the media and ensuring the highest professional standards and accountability.

The period under evaluation is based on original agreement from **2018 to 2021** but got extended to December 2024. The first amendment was an extension with cost in 2022 where MCT had requested for extension to complete important pending and new other activities including development of a new MCT strategy. Another extension happened in 2023 with no cost but this time MCT wanted to ensure that they complete the recruitment process of the new executive director which had started in 2022.

It is also important to note that the 2018 -2021 agreement and its subsequent amendments existed under 'ear marked objectives', the support to MCT was not meant for entire MCT strategy objectives for that period.

Below were MCT outcomes/objectives to be achieved under the grant period. These were outcome one and three from the MCT concept paper or program document. (Program document attached)

Outcome 1

Concerted effort by media and political stakeholders to make current media and other laws and regulations more media friendly and accountable to press freedom.

Outcome 3

MCT arbitration of complaints is improved and widely accepted by public and the media.

1.2 Evaluation object: Intervention to be evaluated.

This intervention was aimed to solve two problems that Sweden chose to support MCT at that time. One is the restrictive media environment where restrictive laws infringing media freedom were launched in Tanzania. In that context, MCT laid out a plan and methods to go about in bringing change on the legal environment to allow freedom of expression. Two is the public lack of awareness of procedures and mechanisms available to hold media houses accountable in case of wrong reporting. MCT claimed to have expertise in managing public complaints and carrying out arbitration to address public concerns an idea which did not seem popular and happening much in Tanzania by that time. MCT role was to raise the demand by

promoting the service to the public with expectation that the public will eventually inquire and utilize the service. (See annex of the project document).

The intended changes to be achieved by end of the project period are articulated in the log frame as attached. MCT has stated impact, outcome, outcome indicators and activities that were supposed to be implemented.

The program was implemented in Zanzibar and mainland targeting journalists and media houses across the country including those owning public televisions and newspapers. MCT has an office in Unguja and mainland; And both have program focal persons to implement the activities.

MCT funding support from Sweden was initially 5 000 000 SEK for the period from 2018 to 2020 and later got extended with another 5 000 000 SEK as cost extension which automatically extended MCT program implementation period to December 2023.

2. The assignment

2.2 Evaluation purpose: Intended users

The primary intended users of the evaluation are,

- The MCT project management team of project/MCT management including the board.
- Sida's unit for Human Rights and Democracy and the Embassy in Tanzania
- Other donors who currently fund MCT

Other stakeholders that should be kept informed about the evaluation include,

- The ministry of information and communication
- Other donors with interest in Media sector in Tanzania
- Media houses and press clubs in Tanzania

2.2 Evaluation purpose: Intended use

The purpose or intended use of the evaluation is to

- Help Sida and its MCT assess progress of the on-going intervention and learn from what works well and less well. The evaluation will be used to inform decisions on how project implementation may be adjusted and improved in future.
- The evaluation will be used by MCT to inform decisions on adjustment, improvements or serve as an input for a new strategy period.
- Provide the wider development community with lessons learned about the topic.

2.2 Evaluation purpose: timing

The evaluation is done this time when funding to MCT is ending; Therefore, it is the time where Sweden would like to learn what has worked and what has not worked well. Sweden also believes that MCT has entered new leadership era and therefore evaluation findings will serve as knowledge to new management.

2.3 Evaluation scope

Embassy of Sweden interventions were limited to target achievements of two objectives and the eventual outcome as stated in section 1.1 of the TOR. The two areas of outcome are broken down to outcome indicators and activities as per log frame attached. This evaluation is not going to assess the whole of MCT program, but only those activities funded solely or partly contributed by Sweden. The evaluation will cover the period from 2018 – 2021 original agreement and the extensions in 2022 and 2023/2024. It is possible that the evaluators will have to go to Zanzibar and some places in the mainland regional centres. As indicated earlier, government officials, media stakeholders, media houses and press club members or journalists might be reached.

2.4 Evaluation questions

- To what extent has the intervention achieved, or is expected to achieve, its objectives, and its results? (*Effectiveness*)
 - How did the intervention achieve its objectives and results?
 - Who has benefitted from these results?
-
- To what extent will the net benefits of the intervention continue, or are likely to continue? (*Sustainability*)
 - Why, why not?
 - Who is likely to continue benefitting from this?
-
- To what extent is the intervention design relevant to the development problem it aimed to address, given the context and available evidence on what works? (*Relevance*) To what extent have the objectives and design continued to be relevant if/when circumstances have changed? (*Relevance*)
-
- To what extent has the intervention generated, or is expected to generate, significant positive or negative, intended, or unintended, high-level effects? (*Long term and short-term outcome and impact*)
-
-
- How compatible has the intervention been with other interventions in the country, sector, or organisation where it is being implemented? (*Coherence*)
-
- How has the organization been embracing learnings into organizational growth and programming. (Adaptability, flexibility)

Questions are expected to be further developed in the tender by the tenderer and further refined during the inception phase of the evaluation.¹⁰⁵ Please note that in line with Sida's utilization-focused approach, the final evaluation questions should always serve the overall purpose of the evaluation (the intended use and users).

2.4 Evaluation design and methods

Sida's approach to evaluation is *utilisation-focused* which means the evaluators must facilitate the entire evaluation process with careful consideration of how all aspects of the evaluation will affect the use of the evaluation. Therefore, the evaluation must be planned and conducted in ways to enhance the utilisation of both the findings and of the process itself, to inform decisions and improve performance. The evaluator's task is not to make decisions independently of the intended users, but rather to facilitate decision making amongst those who will use the findings of the evaluation. This approach entails close interaction between the evaluators and relevant stakeholders/users in the evaluation assignment. The interaction must last throughout the entire evaluation process, from planning to implementation, to reporting and dissemination. An important component of this participatory approach is to enable joint knowledge creation between evaluators and the users of the evaluation.

Please note that in line with Sida's utilization-focused approach, the evaluation process should be adapted to major context changes if needed, to ensure that the evaluation always continues to serve the overall purpose/intended use.

The evaluation is to be designed, conducted, and reported to meet the needs of the intended users and tenderers shall elaborate in the tender how this will be ensured during the evaluation process.

It is expected that the evaluator in the tender briefly describes and justifies an appropriate evaluation design and methods for data collection and analysis, which are later expected to be fully developed in detail and presented in the inception report. The inception report should therefore include an assessment of the evaluability of the evaluation questions and any resulting adjustments that need to be made to the evaluation design that was proposed in the tender.

The evaluator should suggest an evaluation design that can provide credible answers (evidence) to the

evaluation questions using scientific methodologies, to ensure reliable conclusions and a high degree of transparency. Limitations to the chosen evaluation design and methods shall be made explicit by the evaluator and the consequences of these limitations discussed in the tender. The evaluator shall to the extent possible, present

¹⁰⁵ For further detail on the inception report see Time schedule and Deliverables section below.

mitigation measures to address them. A clear distinction should be made between the overall evaluation design and specific methods. Assumptions underpinning the choice of evaluation design and methods should be outlined (e.g. availability of existing data), to reflect possible reasons that the design may need to be altered during the inception phase.

The methodological considerations to include in the tender are:

- How the intended users are to participate in and contribute to the process.
- How the evaluation process will be adapted to the context
- How to facilitate process use, i.e., how to create space for reflection, discussion and learning.
- How evaluation questions will be operationalised, i.e., how they will be interpreted and measured
- How data will be collected and processed for each evaluation question, including sampling methods, interview techniques and cleaning protocol, as required by the chosen evaluation design
- How source criticism will be conducted, including how potential risks will be identified and handled, such as possible biases of respondents, recall problems, and instances when the respondents cannot be considered primary sources
- How data will be analysed, including how causality will be inferred (if relevant)
- How conclusions will be generalised beyond the observations and data generated during the evaluation (if relevant), such as relevant sampling methodologies
- How the Do No Harm principle will be ensured throughout the evaluation.

In cases where sensitive or confidential issues are to be addressed in the evaluation, evaluators should ensure an evaluation design and process including the use of tools, that do not put informants and stakeholders at risk in any step of the evaluation process. A *gender-responsive* evaluation design, methods, tools, and data analysis techniques should be used throughout the evaluation¹⁰⁶.

2.5 Organisation of evaluation management

This evaluation is commissioned by Embassy of Sweden. The primary intended users are Embassy of Sweden and the Partner, MCT. The primary intended users of the evaluation form a steering group, which has contributed to and agreed on the ToR for this evaluation. The steering group is a decision-making body. It will approve the inception report and the final report of the evaluation. The steering group will participate in the start-up meeting of the evaluation, as well as in the

¹⁰⁶ See for example the checklist for assessing gender-responsiveness of evaluations on page 36 in “Good practices in gender-responsive evaluations”, Independent Evaluation Service (IES) of the Independent Evaluation and Audit Services of UN Women (IEAS), [good-practices-in-gender-responsive-evaluations-en.pdf](https://www.unwomen.org/en/digital-library/publications/2019/05/good-practices-in-gender-responsive-evaluations-en.pdf) (unwomen.org) and page 33 in OECD (2021), “Applying evaluation criteria thoughtfully”, OECD Publishing, Paris, <https://doi.org/10.1787/543e84ed-en>

debriefing/validation workshop where preliminary findings and conclusions are discussed.

2.6 Evaluation quality

All Sida's evaluations shall conform to OECD/DAC (2010) Quality Standards for Development Evaluation. The evaluators shall use the Sida OECD/DAC (2014) Glossary of Key Terms in Evaluation and the OECD/DAC (2021) Applying Evaluation Criteria Thoughtfully. The evaluators shall specify how quality assurance will be handled by them during the evaluation process. One aim of the quality assurance should be to ensure that the evaluation meets the quality expectations that are outlined in these Terms of Reference. Evaluators should be prepared to share the evaluation data and analysis in a GDPR compliant manner, with Sida upon request.

2.7 Time schedule and deliverables

A time and work plan should be presented in the tender and further detailed in the inception report. The time and work plan must allow flexibility in implementation. The evaluation shall be carried out from July to October. The timing of any field visits, surveys and interviews should be settled by the evaluator in dialogue with the main stakeholders during the inception phase.

The table below lists key deliverables for the evaluation process. Alternative deadlines for deliverables may be suggested by the consultant and negotiated during the inception phase.

Deliverables	Participants	Deadlines
1. Start-up meeting/s - Virtual	MCT – Management Embassy of Sweden - PO	8th August
2. Draft inception report	Evaluators	Tentative – by 4 September
3. Comments from intended users to evaluators		Tentative – by 19th September
4. Inception meeting - physical	MCT and Sweden	Tentative – 3rd October
5. Data collection & analysis	Evaluators	Tentative – 31st October
6. Debriefing/validation workshop(s)/ meeting(s)	MCT, Embassy of Sweden and other partners	Tentative – 7th November

7. Participatory workshop(s) for joint knowledge creation	Evaluators Primary users Other relevant stakeholders	Tentative – 13th Nov??
8. Draft evaluation report		Tentative – 29th November
9. Comments from intended users to evaluators		Tentative – by 6th December
10. Final evaluation report		Tentative – 13th December
11. Seminar - virtual	MCT and Sweden	Tentative –

The inception report will form the basis for the continued evaluation process and shall be approved by Sida before the evaluation proceeds with the implementation. The inception report should be written in English Language.

The intervention logic or theory of change of the intervention will as a rule need to be further elaborated by the evaluator in the inception report, please note that the evaluation report should at a minimum include a description of the rationale for – and the objectives of – the evaluated intervention. This should include how the evaluated intervention has – or is expected to – support “end users” i.e., MCT management and Embassy of Sweden. Any major underlying factors/assumptions that affect the success of the intervention should also be described.

The inception report should also cover evaluability issues and interpretations of evaluation questions – and present the evaluation design based on this, while explaining any adjustments that need to be made to the evaluation design that was proposed in the tender. Methods for data collection and analysis, including an **evaluation matrix** should be included. A clear distinction between the evaluation design and methods for data collection and analysis shall be made. All limitations to the evaluation design and methods shall be made explicit, in addition to any remaining underlying assumptions. The consequences of these limitations and assumptions for the evaluation outputs should be discussed.

The inception report should also describe how a utilization-focused and gender-responsive approach will be ensured during the evaluation. The inception report should therefore include a **stakeholder analysis**, where stakeholders with a direct interest in the evaluation are identified (e.g. intended users, commissioners, implementers), as well as stakeholders with an indirect interest (e.g. those who should be influenced by the evaluation or are consulted - experts, right holders, etc). The different stakeholders' interest or value in the evaluation process as well as their

participation/ role in it should be described. Furthermore, the report should include a discussion about who has an interest in the success or failure of the intervention being evaluated and an analysis of how this might affect the evaluation, including how findings might affect the future of the intervention. The inception report should therefore include a clear **process description** of stakeholder participation. During the inception phase, the evaluator and the users will have had agreed on who will be responsible for keeping the various stakeholders informed about the evaluation and how to ensure their participation.

A specific time and work plan, including number of hours/working days for each team member, for the remainder of the evaluation should be presented. The time plan shall allow space for reflection and learning between the intended users of the evaluation.

During the data collection and analysis phase, the evaluators will implement the data collection and analysis plan developed during the inception phase. As mentioned above, an important component of Sida's utilisation focused approach is to enable joint knowledge creation between the evaluators and the users of the evaluation. The evaluators therefore need to plan for and conduct **participatory workshops** with different key stakeholders in a relevant manner to the evaluation.

The final report should be no more than 35 pages, excluding annexes. It shall be written in English Language. The report should be written in a plain, clear, and unambiguous language. It should be easily understood by the primary users of the evaluation, as defined in these ToR, and the form of the report should be appropriate given the purpose(s) of the evaluation. It should have a clear structure and follow the format and instructions outlined in Sida's report template for decentralised evaluations (see Annex C). To assure these goals the report should be professionally proofread.

The executive summary of the final report should be maximum 3 pages. In the executive summary the most important information (e.g., key findings) should be presented as early as possible in the text. The executive summary should **easily** be understood by all intended audience(s), including both primary and secondary users. Hence, in terms of the accessibility of the language, the requirements are higher for the executive summary than for the rest of the report.

The final report shall describe the purpose of the evaluation, specifically who is supposed to use the evaluation and for what. It should also describe how the utilization-focused approach has been implemented during the evaluation. This includes how intended users have participated in – and contributed to – the evaluation process, and how evaluation design and methods for data collection have created space for reflection, discussion and learning between the intended users. Furthermore, the gender-responsive approach shall be described and reflected in the findings, conclusions and recommendations along with other identified and relevant cross-cutting issues as outlined in these ToR.

The evaluation questions addressed in the report shall be clearly stated and answered in the executive summary and in the conclusions. The report should include reliable,

clear definitions of any classifications that are used when answering the evaluation questions, meaning that there is a clear description of under what conditions the object will be classified as belonging to a specific category (e.g. what it means to be “coherent”, “relevant” etc in the evaluation context). The operationalisations should be valid, i.e. they should make sense in terms of what they are aiming to measure and it should be clear how they were applied to reach the resulting conclusions.

Evaluation findings shall flow logically from the data, showing a clear line of evidence to support the conclusions. Conclusions should be substantiated by findings and analysis, meaning each conclusion should be presented in a way that clarifies what evidence it is based on and how trustworthy that evidence is. This is particularly important in any instances of causal inference. Similarly, where findings are generalised beyond the evaluation object it should be made clear what the generalisation is based on and how trustworthy it is.

Findings, conclusions, recommendations, and lessons learned should be presented separately and with a clear distinction between them. Recommendations should flow logically from conclusions and be specific and directed to relevant intended users. It should be clear which recommendations are most important / priority to address.

The report shall clearly describe the evaluation design in detail. This description can be added as an annex to the report with a short summary in the main narrative of the report. It should include:

- How the intended users participated in and contributed to the process.
- How the evaluation was adapted to the context.
- How process use was facilitated, i.e., how space for reflection, discussion and learning was created.
- How evaluation questions were operationalised, i.e., how they were interpreted and measured.
- How data was collected and processed for each evaluation question, including sampling methods, interview techniques and cleaning protocol, as required by the chosen evaluation design.
- How source criticism was conducted, including how potential risks were identified and handled, such as possible biases of respondents, recall problems, and instances when the respondents could not be considered to be primary sources.
- How data was analysed, including how causality was inferred (if relevant).
- How conclusions were generalised beyond the observations and data generated during the evaluation (if relevant), such as relevant sampling methodologies.
- How the Do No Harm principle was ensured throughout the evaluation.

Limitations to the evaluation design and methods and the consequences of these limitations for each finding and conclusion shall be described.

The final report annexes shall always include the ToR, the stakeholder analysis¹⁰⁷ and the Evaluation Matrix. The Inception report does *not* have to be included in its entirety in the final report annexes. However, major diversions from the assignment as outlined in these ToR, should be described in an “ex-post” evaluation design annex. Here the evaluators can copy or summarise relevant parts from the inception report and explain further adjustments that needed to be made to the overall evaluation design or specific methods during the data collection and analysis phase.

The final report annexes can also include evaluation management issues e.g., who was consulted when and key meetings that were held. Lists of key informants/interviewees shall only include personally identifiable data if this is deemed safe and relevant (i.e., when it is contributing to the credibility of the evaluation) based on a case-based assessment by the evaluator and the commissioning unit/embassy. The inclusion of personally identifiable data in the report must always be supported by written or otherwise recorded consent.

The evaluator shall, upon approval by Sida/Embassy of the final report and using Sida’s template for decentralised evaluations (see Annex C) and submit it to Nordic Morning (in pdf-format) for publication and release in the Sida publication database. The order is placed by sending the approved report to Nordic Morning (sida@atta45.se), with a copy to the responsible Sida Programme Officer as well as Sida’s Evaluation Unit (evaluation@sida.se). Write “Sida decentralised evaluations” in the email subject field. The following information must always be included in the order to Nordic Morning:

1. The name of the consulting company.
2. The full evaluation title.
3. The invoice reference “ZZ980601”.
4. Type of allocation: "sakanslag".
5. Type of order: "digital publicering/publikationsdatabas.

2.8 Evaluation team qualification

In addition to the qualifications already stated in the framework agreement for evaluation services, the evaluation team shall include the following competencies: Competence in media CSOs methods, perspectives, and types of projects executed by such organizations. Competence in media work, landscape, and knowledge of other factors surrounding media.

It is desirable that the evaluation team includes the following competencies: Local knowledge and awareness of the media context in Tanzania.

¹⁰⁷ The stakeholder analysis can be excluded if there is a good reason to do so, e.g. where it includes sensitive information. If so, this should be discussed and agreed with Sida before delivery of the final report.

A CV for each team member shall be included in the call-off response. It should contain a full description of relevant qualifications and professional work experience.

It is important that the competencies of the individual team members are complementary. It is highly recommended that local evaluation consultants are included in the team where possible. This can bring many advantages, including in-depth contextual knowledge that is invaluable to the evaluation. However, all evaluators on the team must be independent from the evaluation object and evaluated activities and have no stake in the outcome of the evaluation.

Please note that in the tender, the tenderers must propose a team leader that takes part in the evaluation by at least 30% of the total evaluation team time including core team members, specialists, and all support functions, but excluding time for the quality assurance expert.

2.9 Financial and human resources

The maximum budget amount available for the evaluation is SEK 650 000

Invoicing and payment shall be managed according to the following:

The contact person at Sida/Swedish Embassy is Stephen Chimalo, Program Manager CSOs, Education, Media, and Governance. The contact person should be consulted if any problems arise during the evaluation process.

Relevant Sida documentation will be provided by Stephen Chimalo the Program Manager

Contact details to intended users (cooperation partners, Swedish Embassies, other donors etc.) will be provided by Stephen Chimalo, Program Manager

The evaluator will be required to arrange the logistics in consultation with the partner who is aware of the context. These logistics are related to travels, accommodation, events and meetings expected including any necessary security arrangements.

3. Annexes

Annex A: List of key documentation

- MCT website mct.or.tz
- MCT Result Framework
- MCT program document

Annex B: Data sheet on the evaluation object

Information on the evaluation object (i.e. project or programme)	
Title of the evaluation object	Evaluation of MCT 2018-2022 program
ID no. in PLANit	51170087
Dox no./Archive case no.	UM2017/00959/DARE

Activity period (if applicable)	Jan 1 st 2016 – 31st December 2023
Agreed budget (if applicable)	10 000 000 SEK
Main sector ¹⁰⁸	Democracy and Human Rights
Name and type of implementing organisation ¹⁰⁹	NGO, Civil Society (Media Council of Tanzania)
Aid type ¹¹⁰	Project
Swedish strategy	Tanzania strategy 2013 – 2019 and 2020-2024

Information on the evaluation assignment	
Commissioning unit/Swedish Embassy	Development Cooperation Division
Contact person at unit/Swedish Embassy	Stephen Chimalo
Timing of evaluation (mid-term, end-of-programme, ex-post or other)	End Term/program Evaluation
ID no. in PLANit (if other than above).	51170087

Annex C: Decentralised evaluation report template

Can be found here. [Evaluation | Sida Intranet](#)

Annex D : Project/Programme document (as attached)

¹⁰⁸ Choose from Sida's twelve main sectors: education; research; democracy, human rights and gender equality; health; conflict, peace and security; humanitarian aid; sustainable infrastructure and services; market development; environment; agriculture and forestry; budget support; or other (e.g. multi-sector).

¹⁰⁹ Choose from the five OECD/DAC-categories: public sector institutions; NGO or civil society; public-private partnerships and networks; multilateral organisations; and other (e.g. universities, consultancy firms).

¹¹⁰ Choose from the eight OECD/DAC-categories: budget/sector support; core contributions/pooled funds; project type; experts/technical assistance; scholarships/student costs in donor countries; debt relief; admin costs not included elsewhere; and other in-donor expenditures.]

Annex 2 – Documents consulted

Swedish strategies

- Sweden's International Development Cooperation in Tanzania (2013-2019)
- Strategy for Sweden's Development Cooperation with Tanzania (2020-2024)

MCT Annual Reports

- Media Council of Tanzania Narrative Annual Report (2018)
- Media Council of Tanzania Narrative Annual Report (2019)
- Media Council of Tanzania Narrative Annual Report (2020)
- Media Council of Tanzania Narrative Annual Report (2021)
- Media Council of Tanzania Narrative Annual Report (2022)
- Media Council of Tanzania Narrative Annual Report (2023)
- Media Council of Tanzania Narrative Semi-Annual Report (January – June 2024)

MCT Programme Strategies, Logframes, Theory of Change and Organogram

- Media Council of Tanzania Programme Strategy (January 2018 – December 2021)
- Media Council of Tanzania Programme Strategy (January 2023 – December 2027)
- MCT New Strategy 2017 – 2020 Logframe
- Logical Framework for the MCT Programme Strategy (2023 – 2027)
- Media Council of Tanzania Theory of Change for Programme Strategy (2023 – 2027)
- Media Council of Tanzania Organization Chart for Programme Strategy (2023 – 2027)

MCT Publications and Studies

- State of the Media in Tanzania – 2017 – 2018
- State of the Media in Tanzania – 2022 – 2023
- MCT Profile
- Gender in Media Policy – 2019 (English and Swahili versions)
- Challenging the Glass Ceiling: Study of Women in the Newsroom in Tanzania
- Yearbook on Media Quality in Tanzania – 2019
- Yearbook on Media Quality in Tanzania - 2022

MCT Proposals, Rules, Manuals and Deed of Trust

- Media Council of Tanzania Constitution 1995, incorporating all amendments by the National General Convention to August 2016.
- Training Manual on Gender and the Media: Media Council of Tanzania: Revised Edition 2021
- Guidelines on Court Reporting, Third Edition – 2018
- Sera ya Jinsia katika Vyombo vya Habari (Gender Policy in Media Rooms) – 2019
- Code of Ethics for Media Professionals – 2020 Edition
- Mwongozo wa Vyombo vya Habari wa Kuandika Habari za Watoto (Guidelines for Children Reporting) – 2022
- Training Manual on Gender and Media – 2021

Grant agreements

- Grant agreement for “Advocacy for Press Freedom and Media Self-Regulatory Project” The Media Council of Tanzania 2018 - 2020.

- Amendment No. 1 of the Grant Agreement for “Advocacy for Press Freedom and Media Self-Regulatory Project” The Media Council of Tanzania 2018 - 2020.
- Amendment to the Grant Agreement between the Embassy of Sweden and Media Council of Tanzania. Amendment No. 5. Amending the Agreement of 21.03.2018 for the second time as a no cost extension (04.09.2023)

Legislation and policy

- Constitution of the United Republic of Tanzania - 1977 (amended several times)
- The Cybercrimes Act – 2015
- The Access to Information Act – 2016
- The Tanzania Development Vision – 2025
- Media Services Act - 2016

Other

- The Right to Information in Tanzania: Insights on the Laws, Policies and Practices, CIPESA ICT Policy Research Series No. 03|15, January 2015.
- Media Freedom in Tanzania Today: A Qualitative Study on the Freedom of the Press Under President Samia Suluhu Hassan, 2021-2023. Lycke Holmén. Uppsala University, 2023.
- A History of Zanzibar Media – 2014
- Final Report on Designated Legislation in the Nyalali Commission Report – 1994.
- Twaweza Brief Analysis of Media Service Bill – 2016
- Government Statement on Appointment of Journalists Accreditation Board – 2024
- Compendium of Analysis of Media Related Laws in Tanzania – 2019
- Safety of Journalists in Tanzania, African Freedom of Expression Exchange, 2023

Annex 3 – Stakeholders consulted

No.	POSITION	GENDER
	Swedish Embassy/Sida	
1.	Head of Cooperation	Female
2.	Programme Officer	Male
3.	Former programme Officer	Female
	Media Council of Tanzania	
4.	Current Executive Secretary	Male
5.	Former Executive Secretary (by email / written answers)	Male
6.	Programme Officer – Advocacy, Ethics and Alternative Disputes Resolution	Female
7.	Institutional Sustainability Specialist and Zanzibar Office Coordinator	Female
8.	Judge (Rtd), current Board member	Male
9.	Zanzibar Senior Programme Officer	Female
	Tanzania Media Women’s Association Zanzibar	
10.	Project Coordinator, Freedom of Expression	Female
	Shirika La Waandishi Wa Habari Za Maendeleo Zanzibar (Journalists and Development Organisation in Zanzibar)	
11.	Senior Journalist and Deputy Chairperson of the Organization	Male
	House of Representatives	
12.	Member of House of Representative and former Chairperson of Social Welfare Committee of the House of Representative	Male
	Zanzibar Press Club	
13.	Chairperson of Zanzibar Press Club, Board member of UTPC	Male
	International Media Support	
14.	Programme Manager	Female
	East Africa Press Councils’ Association	
15.	Director for Media, Training and Development - Media Council of Kenya and Head of Secretariat East Africa Press Councils	Male
16.	Regional Coordinator at the Media Council of Kenya and Coordinator East Africa Press Councils	Male
	World Association of Press Councils	
17.	President	Female
	International Center for Not-For-Profit Law	
18.	Senior Legal Advisor and Coordinator of Digital Rights	Male
19.	Senior Legal Adviser (Africa)	Female
20.	Regional Director (Africa Programme)	Female
	Office of the High Commissioner for Human Rights East Africa Regional Office	
21.	Human Rights Specialist at Regional Office in Addis Ababa, Ethiopia	Female
22.	Human Rights Advisor based in Tanzania UN Resident Coordination Office	Female
	Arusha Press Club	
23.	Vice Chairman Arusha Press Club and Director Media Aid for Indigenous and Pastoralist Community (MAIPAC).	Male

No.	POSITION	GENDER
	Organisation of Journalists Against Drug and Crime in Tanzania	
24.	Chairperson of the Organization	Male
	Kibaha Institute of Journalism Studies	
25.	Head of Journalism Department	Male
	Tanzania Media Women's Association	
26.	Executive Director	Female
	Union Of Tanzania Press Clubs (UTPC)	
27.	Executive Director	Male
	Tanzania Editors' Forum	
28.	Chairperson and Current President – East African Editors Forum	Male
29.	Former Executive Secretary, Member of Executive Committee	Male
	Media Institute of Southern Africa Tanzania Chapter	
30.	National Director	Female
	Twaweza East Africa	
31.	Director for Communications, Advocacy and Engagement	Female
32.	Senior Digital Communication Officer	Female
33.	Consultant, Advocacy and Engagement	Male
	Legal and Human Rights Centre	
34.	Executive Director	Female
	Tanzania Human Rights Defenders Coalition	
35.	National Coordinator	Male
36.	Programme Specialist	Female
37.	Programme Specialist	Female
	School of Journalism and Mass Communication of University of Dar Es Salaam	
38.	Lecturer/Media and Communication Researcher and Consultant	Male
	Vikes - Finnish Foundation for Media and Development	
39.	Programme Manager (East Africa), Journalists with Finish Broadcasting Authority	Male
	Ford Foundation	
40.	Senior Programme Officer, East African Region	Female
	Swiss Development Cooperation	
41.	Programme Officer – Governance and Media Support Portfolio	Male
	European Union	
42.	Programme Manager	Female
43.	Programme Manager	Female
	Wellspring Philanthropic Fund	
44.	Gender Specialist/Consultant	Female

Annex 4 - Inception report



End Term evaluation of MCT program support 2018 – 2024

Final Inception Report

Sida

Date: 13 November 2023

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Abbreviations

CoRI	Coalition on Right to Information
CSO	Civil Society Organisation
DP	Development Partner
EU	European Union
HRBA	Human Rights-based Approach
IMS	International Media Support
MCT	Media Council of Tanzania
MSEK	Million Swedish Krona
OECD/DAC	Organisation for Economic Co-operation and Development's Development Assistance Committee
RSF	Reporters Without Borders
ToC	Theory of Change
ToR	Terms of Reference
UNESCO	United Nations Educational, Scientific and Cultural Organization
WAHAMAZA	Chama cha Waandishi wa Habari za Maendeleo Zanzibar

1. Introduction

1.1 Background to the assignment

NIRAS has been contracted by the Embassy of Sweden in Tanzania to conduct an **End Term evaluation of Media Council of Tanzania programme support 2018 – 2024**. The team appointed to conduct the evaluation is:

- Greg Moran, Team Leader.
- Marko Gideon, National Media Expert.

1.2 Programme overview

1.2.1 Context

After the 1977 Constitution of the United Republic of Tanzania was amended in 1992 to usher in multipartyism, and as levels of liberalism in the country increased, the media sector grew swiftly. By the start of 2022, Reporters Without Borders (RSF) identified 257 newspapers, 200 radio stations, 46 TV channels, 474 online TV channels and around 100 news websites.¹ However, the proliferation of media outlets that started in the 1990s did not match with the number of properly qualified practitioners and members of the sector lacked ethical standards in reporting, complaint mechanisms and training of media houses' human resources.

Faced with the prospect of government establishing a state body to regulate and control the media, and aware of the challenges in the sector, the media fraternity came together to establish the Media Council of Tanzania (MCT) as an independent, voluntary, non-statutory, self-regulatory body on June 30, 1995. The MCT began operations in 1997 when it was officially registered under the Societies Ordinance of 1954. Initially focused on checking ethical lapses in the media and mediating public complaints against the media through its Ethics Committee, the MCT's activities increased to include training on ethics and professionalism. MCT has also established two information research centres catering for media practitioners, scholars, researchers and journalism students in both Zanzibar and Dar es Salaam.²

Tanzania has improved considerably on the RSF World Press Freedom Index since the coming to power of President Samia Suluhu Hassan following the death of President John Magufuli in March 2021 — rising from 124th in 2021 and 143rd in 2023 to 97th in 2024.³ The number of journalists being censured for their work in Tanzania has also fallen over the past few years: according to MCT, 17 'press violations' (including threats, arrests, denial of access to information and equipment seizures) during 2023 compared to 25 in 2021 and 41 in 2020.⁴ However, the latest MCT State of the Media Report 2022- 2023,

¹ Reporters Without Borders (RSF) World Press Freedom Index: <https://rsf.org/en/country/tanzania>

² While the media is not a union matter, the MCT has an office in Zanzibar that coordinates and follows development of the media in the Isles. Most of the newspapers which are printed on the mainland are also read in the Isles and this is also the case for television and radio.

³ <https://rsf.org/en/index>

⁴ 'Hopes rise for press freedom in Tanzania as number of censored journalists falls', The Guardian, 9 January 2023, Internet: <https://www.theguardian.com/global-development/2023/jan/09/tanzania-press-freedom-violations-president-suluhu>.

released on 4 July 2024, identifies several critical areas that still require intervention: the lack of a supportive legal environment; journalists are still arrested and assaulted;⁵ journalists continue to be denied access to information; and their safety and security are frequently compromised.⁶ The report also highlights ongoing issues such as disinformation, misinformation, fake news, press violations, gender imbalance and unethical reporting.

1.2.2 MCT Programme Strategies

MCT adopts a four-pronged approach to address the challenges facing the media, freedom of expression and access to information, and journalists in Tanzania:

- Advocating (with others) for legislative reform in the areas of freedom of expression and access to information.
- Documenting, publishing and following up on press freedom violations.
- Providing mediation and arbitration to enhance ethical practice and conciliate between media and public, thus contributing to media accountability, efficacy and credibility.
- Monitoring the media to proactively foster media quality and ensure highest standards so that media effectively fulfill its roles.⁷

The Programme Strategy (2018-2021) on which Sida funding is based defines its **vision** as 'a democratic Tanzania with a free, responsible and effective media'. The **mission statement** of MCT is 'to create an environment that enables a strong and ethical media that contributes towards a more democratic and just society'. MCT's **goal** as stated in the body of the document is 'to defend and expand the perimeters of freedom of expression and freedom of the media and ensure the highest professional standards and accountability so that the Tanzanian media is able to contribute effectively to development and democratic processes, providing the citizens with critical means of holding their leaders to account'.⁸ The 2018-Strategy lists four outcomes, as shown in Table 1 below.

A new MCT Programme Strategy was developed to cover the period 2023-2027 but retains the same vision, mission and goal statements as in the previous strategy. It also subtly changes the numbering and names of the outcomes (referring to them as 'programme objectives') as well as the description of the objectives.⁹

⁵ In the 18 months up to end of June 2024, the MCT database recorded 41 press violations – 41% of which happened between January and end of June 2024. All incidents involved arrests of journalists, which marks a shift from the previous leading violation, which was the denial of access to information, to a new trend of arrests. MCT Semi-Annual Report, 2024, p. 26.

⁶ Quoted in the MCT Semi-Annual Report, 2024, p. 2.

⁷ MCT Programme Strategy and Description January 2018 to December 2021, p. 19.

⁸ P. 18. It is noted that this statement differs from the results framework, where it is stated as: 'An environment for freedom of expression and of the media is enhanced and defended and the media exercising their rights, enabling them to provide the public with diverse information and views based on professionalism'. It will be clarified during the evaluation which version is corrected, but that stated above is a better 'goal statement' than the one in the results framework and has been used to develop the reconstructed theory of change.

⁹ The table is based on the list of activities in the original programme document. Additional activities may have been included over the course of the programme that will be added to the list in the draft report.

Table 1: Comparison between the 2018-2021 Strategy and 2023-2027 Strategy

2018-2021 Strategy		2023-2027 Strategy	
Vision 2018-2021		Vision 2023-2027	
A democratic Tanzania with a free, responsible and effective media.		A democratic Tanzania with a free, responsible and effective media.	
Mission 2018-2021		Mission 2023-2027	
To create an environment that enables a strong and ethical media that contributes towards a more democratic and just society.		To create an environment that enables a strong and ethical media that contributes towards a more democratic and just society.	
Overall goal 2018-2021		Overall goal 2023-2027	
To defend and expand the perimeters of freedom of expression and freedom of the media and ensure the highest professional standards and accountability so that the Tanzanian media is able to contribute effectively to development and democratic processes, providing the citizens with critical means of holding their leaders to account.		To defend and expand the perimeters of freedom of expression and freedom of the media and ensure the highest professional standards and accountability so that the Tanzanian media is able to contribute effectively to development and democratic processes, providing the citizens with critical means of holding their leaders to account.	
Outcomes 2018-2021		Corresponds to Programme Objectives in the 2023-2027 Strategy	
Outcome 1: Advocacy Area Concerted efforts by media and political stakeholders to make current media and other laws and regulations more media friendly and accountable to press freedom.		Programme Objective 1: Policy and Legislation Advocacy To enable the media to perform its duties freely and effectively and the public to enjoy freedom of expression and access to information.	
Outcome 2: Press Freedom Violation Register The Press Freedom Violation Register is installed and widely used by journalists and editors, made public by the media, and used by civil society and Members of Parliament for action in favour of press freedom.		Programme Objective 2: Press Freedom and Journalists Safety To enhance press freedom and journalists' safety and security through networking, capacity building, documenting and publishing and following up on press freedom violations so that media practitioners and human rights defenders are provided with empirical evidence and can use it as a tool.	
Outcome 3: Arbitration MCT arbitration of complaints is improved and widely accepted by the public and the media.		Programme Objective 4: Ethics and Alternative Dispute Resolution To enhance ethical practice and conciliate between media and public thus ensuring media accountability, efficacy and credibility.	
Outcome 4: Media Monitoring The quality of the media in Tanzania is well known and it is used to strengthen ethical norms and to raise the level of professionalism.		Programme Objective 3: Media Development and Monitoring To proactively foster media quality and ensure sustainability so that media effectively fulfil its roles.	

The titles of the programme objectives in the latest strategy are not dissimilar to the outcomes in the previous strategy, but there are differences in the explanations of the outcomes / programme objectives. While the programme objectives in the 2023-2027 Strategy better comply with an outcomes-based approach and clarify what results MCT aims to achieve, the extent to which it complicates reporting on effectiveness will be assessed during the data collection and analysis phases. No major

difficulties are expected though since Sida funding was to MCT's advocacy towards improvement of the regulatory framework and its arbitration function, both of which are prioritised in the two strategies.

1.2.3 Sida support to MCT

MCT has had a fruitful partnership with Sida, represented by the Embassy of Sweden in Tanzania, over many years. Sida has supported MCT to collaborate with other actors to strengthen human rights related to the media in the Constitution,¹⁰ press freedom, and democratic governance, and to fulfil its mandate of promoting freedom of the media and ensuring the highest professional standards and accountability within the sector. Sida's latest agreement with MCT, initially intended to run from 2018 to 2021, has twice been extended, will come to an end in December 2024, and is the evaluand of the current evaluation. MCT funding support from Sweden was initially 5 MSEK for the period 2018-2020 but was extended with a further 5 MSEK as a cost extension that automatically extended the MCT programme implementation period to December 2023.

Sida's support to MCT aims to solve two problems that were of concern to Sweden: the restrictive media environment and laws infringing media freedom; and the lack of public awareness of procedures and mechanisms available to hold media houses accountable for false or incorrect reporting. To those ends, Sida's support has focused on only two of the four outcomes in the 2018-2021 Strategy: Outcome 1 (Advocacy Area) and Outcome 3 (Arbitration). However, as further described below, it is possible that Sida's support has also contributed to other outcomes in the Strategy given the nature of Sida's support. Although not specifically required by the ToR, this will be assessed during the evaluation.

1.2.4 Theory of Change (ToC)

1.2.4.1 The ToC in the Programme Strategies

As indicated in Section 1.4 below, the evaluation will be theory based. But determining which theory of change to use to guide the evaluation is complicated by the fact that Sida only supports two of the four MCT outcomes / programme objectives. From initial consultations, it appears though that there are strong linkages and complementarity between the four outcomes, and that Sida's support contributes, at least indirectly, to the two other outcomes / objectives it does not directly support. If that is the case, then the evaluation team will need to consider the ToC underlying the entire programme to determine the extent to which Sida has contributed – directly or indirectly – to the anticipated outcomes and impact of the programme. Although this will only become clearer as the evaluation unfolds and Sida's contribution to all four outcomes / objectives is better understood, and while a more 'Sida-oriented' ToC may need to be developed and included in the draft evaluation report, the following would appear to be the overall ToC for the programme over the period 2018-2024:

Preliminary Theory of Change	
Level	Narrative
Input level	<i>If MCT, with the financial and other support of Sida and other donors:</i>
Activity / Output level	coordinates efforts to reform the legislative and regulatory environment for the media through lobbying, awareness and targeted litigation;

¹⁰ Particularly the rights to freedom of opinion and expression (Article 18 (a)) and to disseminate information (Article 18 (b)).

	• <i>and if MCT monitors and raises awareness of violations of media freedom, freedom of expression and the rights of journalists;</i> • <i>and if MCT provides a space for public complaints against journalists and the media to be resolved through alternative dispute resolution mechanisms;</i> • <i>and if MCT monitors the media to determine and raise awareness of positive trends and compliance with ethical norms and standards;</i> • <i>and if MCT provides or contributes to training for journalists and media houses on ethics and professionalism;</i> • <i>and if MCT encourages gender equality and inclusion within the media;</i>
Intermediate outcome level	• <i>then levels of media and journalistic professionalism, compliance with ethical standard will increase;</i> • <i>and the environment for access to information, freedom of expression and freedom of the media will be enhanced and defended;</i> • <i>and levels of gender equality and inclusion within the media will increase;</i> • <i>and public trust on the MCT as alternative dispute resolution mechanism will increase.</i> • <i>and public trust in the media will be enhanced;</i>
Outcome level	• <i>leading to enhanced freedom of expression, access to information, freedom of the media and safety of journalists;</i> • <i>and the media being more professional, ethical, representative and accountable, able to provide diverse and accurate information that the public can trust;</i>
Impact level	• <i>ultimately contributing to an informed public, able to hold duty-bearers to account and contribute to democracy in Tanzania.</i>

Assumptions: As partly identified in the risk analysis in the 2018-2021 Programme Strategy¹¹, the above ToC assumes that:

- Sufficient human and financial resources would be available, and funding would be timeously disbursed.
- MCT would avoid suspicion that it was pandering to foreign influence given its level of foreign funding.
- MCT would continue to undertake systematic follow-up of results.
- Government would continue to allow the media to self-regulate and conduct arbitration and not put in place a government regulation body or system to do the same.
- Government would not enact laws and policies to curtail freedom of the media, freedom of expression, access to information and the space for the media to operate in Tanzania.
- Government would be amenable to considering amendments to laws and regulations to improve the environment for the media.
- MCT would be able to efficiently deliver services despite the vastness of the country and infrastructure bottlenecks.
- Implementation partners would fulfil their roles, in partnerships and coalitions, and contribute to implementation of the strategic plan.
- Members of the public will know how to lodge complaints with MCT and trust its decisions.

¹¹ MCT Programme Strategy 2018-2021, pp. 33-35.

- Members of the media will be willing to submit to arbitration of complaints and comply with the arbitration findings.
- Media houses and journalists will be willing to provide true and accurate information and not provide mis- or dis-information when it is in their financial or other interests.

Once the above preliminary ToC has been considered, revised in the final inception report and approved by MCT and the Embassy, it will be used to assess key questions of effectiveness and impact during the evaluation. If necessary, it will be revised and presented in the draft evaluation report. Once comments have been received, it will be finalised and included in both narrative and diagrammatic versions in the final evaluation report.

1.2.4.2 Towards a new ToC

Since the appointment of the new Executive Secretary and Board in mid-January 2024, the leadership has been engaging with internal and external stakeholders and development partners to develop a new theory of change for future activities. The following 'overall' ToC is presented in the MCT 2024 Semi-Annual Report as follows:

*"Strengthening the capacities, systems and resources at MCT leads to credibility and legitimacy to effectively, efficiently and timely coordinate the collaborative efforts of stakeholders and coalitions towards enabling healthier information environment for a functioning independent media system in the country for a democratic Tanzania with free, responsible and effective media."*¹²

A PowerPoint presentation has also been provided to the evaluation team, which lists the intended outcomes of the ToC as:

- Outcome 1: Enabling legal and media viability environment that guarantees press freedom, safety and security of journalists, editorial independence and self-regulation.
- Outcome 2: Promoting highest journalism professional standards and accountability.

The PowerPoint also includes key indicators for each outcome and strategies for delivering the outcomes. However, the ToC is still under development, and while the available versions contain valuable information towards a ToC, the ToC does not yet appear to clearly articulate the change MCT would like to contribute to and the pathways to that change. Much of what is available, including the 2023-2027 Programme Strategy results framework, could be used to develop a more 'traditional' version of a ToC though. In line with the learning and utilisation focus of the evaluation, the evaluation team will engage further with MCT during the evaluation to aid the process to develop the ToC. Recommendation in this regard will also be included in the draft final report for consideration.

1.3 Evaluation purpose, users, scope, period and geographic focus

The current agreement and Sida funding to MCT are coming to an end. The Embassy of Sweden would thus like to learn what has worked and what has not worked well. MCT has entered a new leadership

¹² MCT Semi-Annual Report, 2024, p.3.

era, with a new Executive Secretary and Board from January 2024,¹³ and the Embassy also believes that evaluation findings will serve as knowledge to new management.

According to the terms of reference (ToR), the **purpose of the** evaluation is thus to:

- Help Sida and the MCT assess progress of the on-going intervention and learn from what works well and less well, and to inform decisions on how project implementation may be adjusted and improved in future.
- Inform MCT decisions on adjustments and improvements and serve as an input for a new strategy period and also to inform MCT new Strategy mid-term evaluation to be later next year.
- Provide the wider development community with lessons learned about the topic.

The evaluation is thus both **summative** and **formative**, with a strong focus on utilisation and learning.

The **primary users** of this evaluation are:

- The MCT project management team for the project and the overall MCT management and board.
- Sida's Unit for Human Rights and Democracy and the Embassy in Tanzania.
- Other donors that currently fund MCT.

Other stakeholders to be kept informed about the evaluation include:

- The Ministry of Information and Communication.
- Other donors with an interest in the media sector in Tanzania.
- Media houses and press clubs in Tanzania.

The **scope** of the evaluation is limited in the ToR to the two outcomes that Sweden has supported, and the overall goal / impact, although the evaluation will also consider the extent to which Sida's support has directly or indirectly contributed to other outcomes / programme objectives in the two strategies that applied during the evaluation period. The **evaluation period** is 2018-2024 and includes the period from 2018-2021 under the original agreement as well as the two extensions in 2022 and 2023/2024. The **geographical focus** is both mainland Tanzania and Zanzibar.

1.4 Evaluation questions and matrix

The ToR contain a comprehensive set of pertinent, and thoughtful evaluation questions based on five of the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD/DAC) evaluation criteria: relevance, coherence, effectiveness, impact and sustainability. The questions have largely been retained, with some re-ordered to align more closely with OECD/DAC criteria or re-worded to align more closely with the programme itself. Given Sida's prioritisation of gender equality and the human rights-based approach (HRBA) in development cooperation and recognising

¹³ The Board was elected in September 2023. The Executive Secretary was also appointed in September 2023 and began orientation at that time before reporting for work in January 2024.

that gender equality and inclusivity is a cross-cutting issue for MCT (and Sida support required a focus on gender equality), a question related to gender equality and the HRBA has also been added.

Relevance:

The ToR include two questions on relevance that address both parts of the OECD/DAC criterion: relevance at design and the degree to which the project was able to adapt to changes and remain relevant over time.¹⁴ The ToR list a further question: How has the organisation been embracing learnings into organisational growth and programming? The degree to which lessons learned have been used to adapt, and the degree of flexibility of the programme (and Sida's support) is closely linked to effectiveness and it has been moved under the 'effectiveness' criterion below:

1. Was the Programme Strategy relevant to the needs of journalists and the media in Tanzania given the context at design and available evidence on what works? (*Relevance at design.*)
2. Have the objectives and design continued to be relevant if/when circumstances have changed? (*Relevance over time.*)

Coherence

The OECD/DAC definition of 'coherence' includes internal and external coherence:

- **Internal coherence** is the extent to which synergies and interlinkages were created between Sida's support to MCT with other Sida support to the media, freedom of expression, democracy and human rights in Tanzania.
- **External coherence** assesses how coherent Sida's support to MCT has been with the support of other development partners (DPs) to media freedom, freedom of expression and related rights in Tanzania. It includes levels of complementarity, harmonisation and co-ordination with others, and the extent to which Sida's adds value to the support of others while avoiding duplication of effort.

The question in the ToR on coherence focused only on external coherence. Since Sida has provided support to various MCT partners during the evaluation period,¹⁵ a question on internal coherence has been added:

3. Was Sida's support to MCT coherent with other Sida support to the media, freedom of expression, and human rights generally? (*Internal coherence.*)
4. Has Sida's support to the programme been coherent with the support to the media, freedom of expression and rights of journalists provided by others? (*External coherence.*)

Effectiveness

The ToR include one overall question on 'effectiveness' and the extent to which the two outcomes of the programme Sida supported have been or can be expected to be achieved by the end of 2024. Two

¹⁴ See OECD/DAC, Better Criteria for Better Evaluation: Revised Evaluation Criteria Definitions and Principles for Use, December 2019.

¹⁵ Including at least the Union of Tanzania Press Clubs; Legal and Human Rights Centre; and Tanzania Human Rights Defenders Coalition.

‘sub-questions’ are included related to how it was able to achieve its results and who benefitted from them. The two sub-questions will be addressed in the overall analysis and assessment of results but have been combined into one below to ensure the evaluation focuses on them. Based on preliminary discussions, a question has also been added to allow the evaluation to consider how Sida’s support to two outcomes might have contributed to the realisation of other programme outcomes.

5. Has the programme achieved, or can it be expected to achieve, the objectives and results included in Sida-funded outcomes?
6. Has Sida’s support contributed to the achievement of other programme outcomes?
7. What contributed to the programme achieving its results and who benefitted from them?
8. How flexible was the programme during implementation and were lessons learned used to adapt the programme to changes in the context?

Impact

Although the ToR refer to ‘long term and short-term outcome and impact’ in the question on impact, the short-term outcomes will already have been assessed under ‘effectiveness’. Otherwise, the question in the ToR replicates the OECD/DAC definition of impact.¹⁶ Since Sida only directly supported two of the four outcomes in the MCT Programme Strategy but might well have contributed to other outcomes and thus to overall impact, the question has been slightly modified below:

9. Has Sida support to the programme generated significant positive or negative, intended, or unintended, high-level effects and contributed to the overall impact of the programme?

Sustainability

The ToR include one standard question on sustainability, with two sub-questions related to why benefits will be sustained (or not) and who is likely to continue to benefit. The two sub-questions will most likely be answered in answering the main question, but they have been merged into the question to ensure the evaluation focuses on them:

10. Will the net benefits of the programme continue, or are likely to continue, why / why not, and who is likely to continue to benefit?¹⁷

Gender equality and the HRBA

The following question is proposed to ensure the evaluation focuses on two key Swedish priorities:

¹⁶ OECD, *Glossary of Key Terms in Evaluation and Results-Based Management for Sustainable Development (English, French, Spanish)*, 2023.

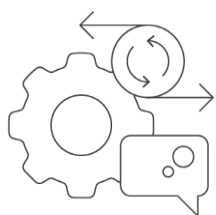
¹⁷ The MCT 2024 Semi-Annual Report notes that a government statutory Media Council (Independent Media Council) may soon be established through the Media Services Act of 2016. Although this has yet to be established, it does raise concerns about MCT’s future sustainability. Although a specific question related to this has not been added, the degree to which it might impact on MCT’s sustainability has been included as an indicator for the evaluation question in the evaluation matrix (Appendix 1).

11. Were gender equality and the HRBA integrated into the design and implementation of the programme, and what results did this lead or contribute to?

Evaluation matrix

Based on the above questions, an **evaluation matrix** is attached as Appendix 1 that includes the evaluation questions organised by OECD/DAC evaluation criteria, indicators for assessment, sources of information, and data collection methods to be used.

2. Approach and methodology



In this section we present our overall approach, the design and conceptual framework of the evaluation, and the data collection strategies we intend to apply.

2.1 Overall approach

The evaluation will apply a theory-based approach which is utilisation- and learning-focused; participatory, confidential and transparent; and that is gender sensitive and rights-based throughout. Where necessary, outcome harvesting, and contribution analysis will also be used to determine what outcomes have been achieved and the degree to which the programme contributed to such outcomes.

A theory-based approach. Although there is no theory of change in either Programme Strategy and one is only being prepared during 2024 to guide MCT going forward, the implied theory of change in available documents has been used to reconstruct the ToC that applied during implementation (Section 1.3.2 above). Once revised after comments and approved in the final inception report, the evaluation team will use the ToC to determine the extent to which Sida's support has contributed to achieving the specific outcomes it funded, indirectly contributed to other outcomes, and contributed to any impact that has been achieved.

Outcome harvesting and contribution analysis: The evaluation will use **outcome harvesting** to determine what outcomes and impact have occurred. Unlike many evaluation approaches, outcome harvesting does not measure progress towards predetermined objectives or outcomes, but rather collects evidence of what has changed and then, working backwards, tries to determine whether and how an intervention contributed to these changes.¹⁸ In that way, it allows the evaluators to identify results that might be missed by simply measuring the programme against indicators in the results framework. Since many factors are at play when it comes to freedom of expression and media freedom in Tanzania, the team will conduct a level **contribution analysis** to determine the degree to which results and impact - good or bad - can reasonably be linked to the programme and Sida's support to it.

Contribution analysis¹⁹

Contribution analysis is a methodology used to identify the contribution a programme has made to a change or set of changes. The aim is to produce a credible, evidence-based narrative of contribution that a reasonable person would be likely to agree with, rather than to produce conclusive proof. It is based on a recognition that it is difficult to prove attribution

¹⁸ https://www.betterevaluation.org/en/plan/approach/outcome_harvesting

¹⁹ Adapted from 'Contribution Analysis', INTRAC, 2017. www.intrac.org/wpcms/wp-content/uploads/2017/01/Contribution-analysis.pdf

for many development interventions and is intended to be used alongside theories of change that set out how change is, or was, expected to happen. The aim is to produce a plausible, evidence-based narrative that a reasonable person would be likely to agree with. A plausible narrative is considered to have been developed when four conditions are met:

1. The intervention is based on a theory of change, accompanied by agreed and plausible assumptions, that explains how the intervention sought to bring about any desired changes.
2. Activities were implemented properly.
3. Adequate evidence can be found to show that change occurred at each level of the theory of change.
4. The relative contribution of external factors or other development interventions can be dismissed or demonstrated.

A utilisation / learning focused and participatory approach: The evaluation will be participatory and utilisation- and learning-focused throughout. To promote utilisation and learning, the evaluation team will remain in constant communication with the Embassy and MCT during the process. The team has already held a start-up meeting with the Embassy and MCT (26 September 2024) and has consulted and engaged both in the development of the evaluation methodology, identification of key stakeholders, and how best to achieve the evaluation's objectives. Mindful that the delayed start has meant that feedback may not be available to MCT as it plans for the future, the Embassy and MCT will be kept informed of any major findings during data collection as they arise. A debriefing and validation meeting to present preliminary main findings and recommendations will be held with MCT and the Embassy as soon as data collection comes to an end, and the evaluation team will conduct a virtual seminar of the evaluation's main findings, learnings, observations and recommendations for MCT and the Embassy (and any other stakeholders determined by MCT and the Embassy) once the final report has been approved. As further discussed in Section 2.3.2 below, a participatory workshop with primary users and other relevant stakeholders for joint knowledge creation and sharing may also be held, which will be discussed and agreed during the inception meeting and presentation of the draft inception report on 25 October 2024. To further enhance utilisation, the approved evaluation report will be available for MCT to use in their planning and discussions and published and accessible to the public on Sida's webpage.

Transparency, accountability and confidentiality: The evaluation team is mindful of the changes in the context in recent months and recognises that interviewees need to know that their comments and input will be kept confidential to feel free to express themselves. The evaluation team will ensure transparency and accountability by informing interviewees about the objective and methodology of the evaluation and how the data will be used and reported. The main questions to be covered during interviews and any potential roundtable discussions will be shared in advance and will include a note to say that the evaluators will comply with the Chatham House Rule (where what is said may be used in the evaluation but will not be attributed to any individual or stakeholder in the report). Notes of interviews will be kept strictly confidential and minimal details will be included in the annex of stakeholders consulted to protect privacy rights and ensure that no personal or other details are revealed that might allow anyone to determine who said what. To further support confidentiality, MCT will be afforded an opportunity when commenting on the draft report to request that anything that exposes participants to any risk is removed. Publishing the final report on Sida's webpage will also enhance transparency and accountability.

A gender sensitive and rights-based approach: The evaluation will integrate the **human rights-based approach (HRBA) and gender equality** throughout and will foster empowerment through participation of stakeholders in producing knowledge about the programme. An evaluation question has been added to allow the team to consider the degree to which the HRBA and gender equality were

included in the programme and in the overall approach of MCT during programme design, workplan-ning, and during implementation, and how well they have been mainstreamed into MCT activities. The evaluation team will strive to ensure that as many women's voices as possible are heard and to deter-mine whether the programme is gender-responsive and gender-inclusive. The final report will also in-clude lessons that might inform the Embassy / Sida, MCT and partners going forward.



2.2 Data collection and evaluation methods

The evaluation will draw on both primary and secondary data, triangulated to the great-est degree possible.

Primary data will include:

1. **Document review and analysis** of all programme documents, relevant Sida strategies, annual and semi-annual reports, MCT State of the Media and other reports, programme data, MCT policies, a sample of decided complaints brought before the Ethics Committee, legislation pertaining to the media and freedom of expression, and any other documents identified by the Embassy, MCT and partners during the evaluation.
2. **Key informant interviews.** Although the exact list of interviewees is still being determined in con-sultation with the Embassy and MCT during the start-up and inception phase, the following poten-tial key informants appear from the ToR, MCT website, and preliminary discussions:
 - Embassy / Sida staff (Head of Cooperation, Programme Officer).
 - Current MCT senior staff (Executive Secretary, Acting Programme Manager, Institutional Sus-tainability Specialist and Zanzibar Senior Programme Officer).
 - Previous MCT senior staff (Executive Secretary and other staff if required).
 - Previous Board President and one current Board member.²⁰
 - CoRI partners.²¹ The following sample is proposed: Tanzania Media Women's Association; Union of Tanzania Press Clubs; Tanzania Editors Forum; Media Institute of Southern Africa Tanzania Chapter; Media Owners Association of Tanzania; Twaweza East Africa; Legal and Human Rights Centre; and Tanzania Human Rights Defenders Coalition.
 - Zanzibar Media Committee members: Tanzania Media Women's Association, Zanzibar; Zanzibar Press Clubs; Chama cha Waandishi wa Habari za Maendeleo Zanzibar (WAHAMAZA)²² (noting that these may best be consulted in a joint meeting).

²⁰ According to the MCT Semi-Annual Report, 2024, the MCT President and Chairman of the Governing Board, retired Judge Juxon Mlay, passed away in May 2024.

²¹ Sampling of CoRI and international partners has been made in discussion with MCT and is based on the degree of interaction with MCT, ability to speak to specific issues (gender equality), and the level of representation of media roleplayers and stakeholders. For example, the sample includes the Union of Tanzania Press Clubs as the representative of Press Clubs, and the Tanzania Editors Forum as the representative of editors. It also includes organisations such as Legal and Human Rights Centre; and Tanzania Human Rights Defenders Coalition that have been co-litigants with MCT in strategic litigation.

²² Zanzibar Development Journalists Association.

- A sample of key affiliated national and international media organisations and civil society members (remote interviews): International Media Support (IMS), East Africa Press Councils Association, World Association of Press Councils, International Center for Not-for-Profit Law, Office of the High Commissioner for Human Rights East Africa Regional Office.
 - Other stakeholders outside of Dar es Salaam or Zanzibar (remote interviews): Arusha Press Clubs; Organization of Journalists Against Drug and Crime in Tanzania (based in Mwanza).
 - Representatives of Ministry of Information and Communication, Parliament and House of Representatives identified by MCT.
 - Representatives of key universities / journalism colleges: School of Journalism and Mass Communication of University of Dar es Salaam; Kibaha Institute of Journalism Studies.
 - MCT donors during the evaluation period (in addition to Sida): Wellspring Philanthropic Fund, Finnish Foundation for Media and Development, IMS (both a donor and a partner), Open Society Foundations, and Ford Foundation.
 - Development partners supporting media freedom, freedom of expression, safety of journalists in Tanzania but that do not fund MCT directly (European Union, Ireland, United Kingdom, Switzerland, and UNESCO).
3. **Roundtable discussions.** In discussion with MCT during the planning for the on-site mission, some roundtable discussions may be held with CoRI partners or others to maximise the available time.

Secondary data sources will include online resources and reports of UN agencies (Universal Periodic Review and UNESCO reports), International Media Support reports, reports of other DPs, international organisations (such as Reporters Without Borders, Freedom House, Human Rights Watch), reports of other development partners, relevant international and regional indices (such as the World Press Freedom Index and the Ibrahim Index of African Governance), and 'grey literature' such as newspaper and other reports.

2.3 Limitations and challenges

The first challenge for the evaluation is the delayed start. The start-up meeting was envisaged for 8 August 2024 in the ToR only took place on 26 September 2024, which has pushed the inception phase into a period when the Project Manager and the MCT Executive Secretary are planning to take leave or have other commitments. It also means that the evaluation will stretch over the Southern summer months when many people take lengthy vacations, often travelling to remote areas with limited communication. This was discussed in the start-up meeting, and it was agreed that the dates for analysis and reporting would be extended beyond the end of 2024 (as illustrated in the table in Section 2.4 below). However, it does not mean that the hope the Executive Secretary expressed in the start-up meeting – that the report would be ready in time to feed into planning for 2025 – is not realisable. To address this need, the evaluation team will constantly update the Executive Secretary and the Embassy on emerging findings and potential recommendations during the evaluation. The validation workshop will also be held during early December 2024 to provide feedback for future planning.

MCT has been around since 1997, is a major roleplayer in the media space, and has built relationships and partnerships with most media bodies, universities and journalism schools, and media and human rights focused CSOs in Tanzania. It also chairs the Coalition on Right to Information (CoRI): a large coalition of media, human rights and legal organisations with a shared ideal of promoting and defending freedom of expression and access to information. MCT has also developed relationships and partnerships with many regional and international media organisations. There is thus some question as to how many 'impartial' voices can be heard from those with no relationship with MCT to get an 'outsider's view' of MCT's performance. To ensure impartiality, the evaluation team will stress that interviewees should feel free to express themselves in the knowledge that anything they say will be treated in strictest confidence, and that one of the main reasons for the evaluation is for MCT to learn from past experiences, both positive and negative, so that the new leadership is aware of where it needs to improve.

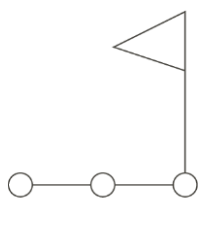
The fact that MCT has many national and international stakeholders also means that there are potentially many organisations to consult. To avoid reaching a 'point of saturation' (where the same responses are received in multiple interviews), the evaluation team has prepared a preliminary sample of national and international partners, in consultation with MCT and the Embassy, in Section 2.2 below. The workplan also includes days for remote consultations with regional, international and other stakeholders prior to the on-site mission to Tanzania.

Recent events in Tanzania suggest that the political space and the space for the media and civil society might be becoming constrained.²³ There are thus concerns related to the safety of participants in the evaluation and their confidence and freedom to express their views in the current context. To address this, the evaluation will be conducted with the greatest respect for confidentiality and privacy (as explained further in Section 2.1 below) and will follow a rights-based approach with a design that does not put informants and stakeholders at risk during data collection or dissemination.

Finally, it is noted that, while national elections are scheduled for October 2025 and should not impact on the evaluation, local government elections are scheduled for 27 November 2024, which will be during the on-site mission if it goes ahead as planned. While the Embassy has confirmed that the local government election should not impact on the evaluation, the team will not schedule interviews on 27 November. Instead, once the National Media Expert has had the opportunity to vote, the evaluation team will meet internally to capture main findings to that date that can be shared with MCT and the Embassy and finalise logistical arrangements for the remainder of the mission. The team will also continuously track events to see whether any delays or difficulties might be experienced in the weeks leading up to the election and, in consultation with the Embassy, will revise the workplan or approach to accommodate them.

²³ For example, on 1 October 2024, the Tanzania Communications Regulatory Authority (Tanzania's communications regulator) suspended the digital platforms of a local media company (Mwananchi Communications) over the publication of what it called restricted content, which some say is aimed at muzzling media that is critical of the government. In early September 2024, the body of a senior opposition official who had been abducted from a bus by armed men was found on the outskirts of Dar es Salaam with signs he had been beaten and had had acid poured on his face. See: <https://www.timeslive.co.za/news/africa/2024-10-03-tanzania-suspends-media-companys-online-platforms-for-30-days/>

2.4 Phases of the evaluation



The evaluation will consist of four phases: start-up and inception, data gathering, analysis and reporting, and dissemination (as detailed below).

2.4.1 Start-up and inception phase (26 September-8 November 2024)

The evaluation began with a start-up meeting with the Embassy and MCT Executive Secretary on **26 September 2024** to discuss and clarify any issues arising from the ToR and/or NIRAS proposal and to obtain as much information as possible on key stakeholders to be consulted and how best to consult them.

The **inception phase** began immediately after the start-up meeting and included a **document review** of available documents (which will continue throughout the assignment), preliminary discussions with MCT to further identify stakeholders to be consulted and how best to consult them, and fine tuning the logistical and methodological planning.²⁴ The team then prepared the **draft inception report** and submitted it to the Embassy and MCT on **16 October 2024** for written comments to be submitted by **1 November 2024**.²⁵ In the interim, the team convened an online **inception meeting** with the Embassy and MCT on **25 October 2024** to present the draft inception report and to clarify any issues raised in it before written comments are submitted.

Based on all comments received, the team submitted the **final inception report** on **13 November 2024**), accompanied by a **comment sheet** setting out how each main comment has been addressed.²⁶ The Embassy was requested to approve the final inception report or provide a 'no objection' by **15 November 2024** to ensure the on-site mission can proceed as planned.

Deliverables

- Draft inception report (including revised methodology, evaluation matrix and workplan).
- Final inception report and comment sheet.

2.4.2 Data collection phase (11 November-6 December 2024)

Data collection will include interviews and possible roundtable discussions with the final list of stakeholders and ongoing document and quantitative data review. To maximise the time while the inception report is being approved, the team will conduct remote meetings with those based outside of Dar es Salaam or Zanzibar in the period **11-15 November 2024**. The team will convene in Tanzania for interviews and discussions on the mainland and Zanzibar during a two-week on-site mission from **18-29 November 2024**. To ensure participation, MCT will assist the team to contact all stakeholders to be

²⁴ A list of documents consulted to date is attached as Appendix 2.

²⁵ As noted in the comment sheet, there was a delay in receiving comments, which were only sent to the evaluation team on 12 November 2024.

²⁶ The submission and approval of a final inception report is not mentioned in the time schedule and deliverables on pages 7-8 of the ToR. However, the ToR do note that the Steering Committee (made up of the Embassy and MCT) will approve the inception report (page 6) and it is usual practice for the inception report to be approved prior to the on-site mission.

consulted by email, explaining to them the purpose of the evaluation, the dates for consultation, copying the ToR, and introducing the evaluation team to them. The evaluation team will then follow up with each stakeholder to find a date and time that suits them for the in-person or remote meetings.

To assist MCT with their planning for 2025 and in line with the utilisation-focused approach, the team will ensure that MCT and the Embassy are kept abreast of key findings and potential recommendations as they emerge. And immediately following the end of the data collection phase, the team will prepare a **debriefing note and PowerPoint presentation** of their preliminary main findings, conclusions and recommendations for discussion at a virtual **debriefing / validation workshop** on **6 December 2024** before more detailed analysis and reporting commences.

Participatory workshop – a note: The ToR refer to a ‘participatory workshop with primary users and other relevant stakeholders for joint knowledge creation and sharing’ at the end of the data collection phase. In discussion with the Embassy, it appears that this workshop remains uncertain. It would involve costs that Sida cannot cover, and it is not clear whether MCT can use funds from other DPs to support it. It is also not clear yet whether this should take place before or after the report is approved. If it takes place **before** approval, it will essentially amount to a verification exercise since the findings and lessons learned would still be provisional prior to the approval of the final report and might change. That might duplicate the verification meeting with MCT and the Embassy. If it is held **after** approval, then it does not seem that the evaluation team would need to conduct this: it could be done by MCT in its own time and when funds allow, and the results could be shared with partners in other ways. As agreed with the Embassy, the issue has been flagged for discussion at the inception meeting / presentation of the draft inception report and prior to finalisation of this report.

Deliverables: PowerPoint presentation and debriefing note.

2.4.3 Analysis and reporting (9 December 2024-14 February 2025)

Data analysis will begin after the validation meeting. During this, the team will analyse and **triangulate data** obtained from primary and secondary sources (documents, interviews, roundtable discussions, programme data, and secondary data) and comments received during the debriefing workshop (and participatory knowledge creation workshop if held at this stage). Analysis and triangulation of data will ensure that information received is accurate and correctly interpreted, and that data from multiple sources is pulled together into a coherent narrative of what has occurred at the programme level.

Based on this analysis, the team will prepare and submit a **draft evaluation report** to the Embassy and MCT for comments by approximately **24 January 2025**. In addition to the findings and conclusions, the draft report will include **lessons learned** for Sida and other development partners supporting media freedom / freedom of expression in Tanzania and elsewhere, **lessons learned** for MCT to inform decisions on adjustment, improvements or serve as an input for the remainder of the current strategy. The report will also include **recommendations** for Sida and MCT on how such programmes may be improved when it comes to relevance, effectiveness, and sustainability, and how project implementation may be adjusted and improved in future.

Comments to the draft report will be requested by **7 February 2025**. Once comments have been received, the team will revise the report and submit a **final evaluation report and comment sheet** setting out how all main comments have been addressed by **14 February 2024**.

Deliverables:

- Draft evaluation report.
- Final evaluation report and comment sheet.

2.4.4 Dissemination seminar (21 February 2025)

At a date to be confirmed with the Embassy and MCT, the team will prepare and conduct a virtual dissemination seminar on the final approved report and its main findings, lessons learned and recommendations. As indicated in the table below, the evaluation team proposes that this be held on **21 February 2025** but will comply with any request for an alternative date.

2.5 Milestones and deliverables

The evaluation will include the following milestones and deliverables (see more details in the Work Plan attached as Appendix 3):

What	Who	Dates in ToR	Proposed dates
Start of the evaluation	Embassy of Sweden, MCT and NIRAS	August 8	26 September 2024
Submission of the draft inception report	NIRAS	Tentative – by September 4	16 October 2024
Presentation of draft inception report	MCT, Embassy of Sweden, NIRAS	Tentative – 3rd October	25 October 2024
Written comments on inception report	Embassy & MCT	Tentative – by 19th September	12 November 2024
Submission of final inception report	NIRAS	Not mentioned	13 November 2024
Approval of inception report	Embassy of Sweden	Not mentioned	15 November 2024
Data collection	NIRAS (stakeholders)	Tentative – 31st October	11-29 November 2024: • Remote interviews: 11-15 November. • On-site mission: 18-29 November.
Debriefing/validation workshop	Embassy of Sweden, MCT, NIRAS	Tentative – 7th Nov	6 December 2024
Participatory workshop(s) for joint knowledge creation	Evaluators Primary users Other relevant stakeholders	Tentative – Nov 13	To be determined. ²⁷
Submission of draft evaluation report	NIRAS	Tentative – 29th Nov	24 January 2025
Comments on draft report	Embassy of Sweden, MCT	Tentative by Dec 6	7 February 2025
Submission of final report	NIRAS	Tentative Dec 13	14 February 2025
Seminar	Embassy of Sweden, MCT & NIRAS	Tentative	21 February 2025

²⁷ To be discussed at the inception meeting and prior to finalisation of the current report.

Appendix 1: Evaluation Matrix

Notes:

1. The term 'programme documents' includes programme proposals, programme strategies, strategic plans, annual narrative reports, programme data, gender equality and other policies, publications and reports, etc.
2. Where indicators rely on an assessment of the degree / level to which the indicator has been achieved, the evaluation team will, in so far as is possible, employ a four-point rating scale: 'insufficient', 'satisfactory', 'good' or 'excellent'.

Evaluation Questions	Indicators to be used in Evaluation	Sources	Methods
Relevance			
1. Was the Programme Strategy relevant to the needs of journalists and the media in Tanzania given the context at design and available evidence on what works?	• Degree of alignment with relevant Swedish strategies for Tanzania. • Degree of alignment with Tanzania development strategies. • No. and type of consultations prior to finalising the programme design. • No. and type of context / gender / human rights analysis conducted. • No. and type of activities to identify evidence of what works in the context. • Degree of alignment with the needs and expectations of the media and journalists at design. • Degree of alignment with needs and thematic priorities of MCT.	• Swedish strategies for Tanzania. • Other relevant Swedish strategies. • Context / gender / human rights analyses. • Programme documents. • Key Informants. • Reports of UN Agencies and international organisations. • Relevant international indices.	• Document analysis. • Semi-structured interviews. • Online research. • Analysis of international indices. • (Possible) roundtable discussions.
2. Have the objectives and design continued to be relevant if/when circumstances have changed?	• No. and type of changes in the context during implementation. • No. and type of changes introduced in response to changes in context. • Degree of adaptation of objectives and design in response to changes in the context.	• Programme documents. • Key Informants. • Reports of freedom of expression organisations and institutions. • Relevant international indices.	• Document analysis. • Semi-structured interviews. • Online research. • Analysis of international indices. • (Possible) roundtable discussions.

Coherence			
3. Was Sida's support to MCT coherent with other Sida support to the media, freedom of expression, and human rights generally?	- Degree of coherence / complementarity with other Sida support to the media, freedom of expression and journalists in Tanzania. - Degree of coherence / complementarity with other Sida support to human rights in Tanzania.	- MCT programme documents. - Programme documents of other Sida support. - Key informants.	- Document analysis. - Semi-structured interviews. - Online research.
4. Has Sida's support to the programme been coherent with the support to the media, freedom of expression and rights of journalists provided by others?	- Level of coordination with other DPs. - No. of donor coordination meetings. - Degree of coherence / overlap with similar programmes supported by other DPs.	- Programme documents. - Key Informants. - Reports of other development partners.	- Document analysis. - Semi-structured interviews. - Online research.
Effectiveness			
5. Has the programme achieved, or can it be expected to achieve, the objectives and results included in Sida-funded outcomes?	- No. and type of results achieved. - No. of joint advocacy campaigns conducted. - No. and type of changes to laws and regulations. - No. of arbitration cases conducted and publicised, disaggregated by sex. - Levels of compliance and satisfaction with arbitration rulings. - Levels of compliance with professional and ethical standards as a result of Sida support. - Degree to which freedom of expression, access to information and freedom of the media has increased.	- Programme documents and data. - Key informants. - Reports of freedom of expression organisations and institutions. - Relevant international indices.	- Document analysis. - Semi-structured interviews. - Outcome harvesting. - Contribution analysis. - Online research. - Analysis of international indices. (Possible) roundtable discussions.
6. Has Sida's support contributed to the achievement of other programme outcomes?	- No. and type of other outcomes reported to which Sida support has contributed. - Degree to which safety of journalists has increased as a result of Sida's support to MCT. - Levels of public trust in the media (if measurable).	- Programme documents. - Key informants. - Reports of freedom of expression organisations and institutions. - Relevant international indices.	- Document analysis. - Semi-structured interviews. - Outcome harvesting. - Contribution analysis. - Online research. - Analysis of international indices.

			• (Possible) roundtable discussions.
7. What contributed to the programme achieving its results and who benefited from them?	• No. and type of beneficiaries. • Type of activities / outputs that contributed to results.	• Programme documents. • Key informants.	• Document analysis. • Semi-structured interviews. • (Possible) roundtable discussions.
8. How flexible was the programme during implementation and were lessons learned used to adapt the programme to changes in the context?	• No. and type of adaptations based on lessons learned. • Degree of flexibility in adapting programme (MCT). • Degree of flexibility in adapting programme (Sida). • No. of outcomes positively affected by adaptation. • No. of outcomes negatively affected by adaptation.	• Programme documents. • Key informants. • Reports of freedom of expression organisations and institutions. • Relevant international indices.	• Document analysis. • Semi-structured interviews. • Online research. • Analysis of international indices. • (Possible) roundtable discussions.
Impact			
9. Has Sida support to the programme generated significant positive or negative, intended, or unintended, high-level effects and contributed to the overall impact of the programme?	• No. and type of contributions to positive higher-level results. • No. and type of contributions to negative higher-level results. • No. of examples of unintended impact beyond indicators in the results framework. • Changes to the environment for freedom of expression and of the media. • Degree to which the public is better able to hold duty-bearers to account (if measurable).	• Programme documents. • Key informants. • Reports of freedom of expression organisations and institutions. • Relevant international indices.	• Document analysis. • Semi-structured interviews. • Outcome harvesting. • Contribution analysis. • Online research. • Analysis of international indices. • (Possible) roundtable discussions.
Sustainability			
10. Will the net benefits of the programme continue, or are likely to continue, why / why not, and who is likely to continue to benefit?	• No. and type of results and benefits that will be maintained. • No. and type of partners / beneficiaries / stakeholders that will continue to benefit. • Degree to which MCT has taken ownership of outcomes supported by Sida. • Level of funding secured / about to be secured to ensure benefits of Sida support will be maintained.	• Programme documents. • Key informants. • Funding proposals prepared / in preparation.	• Document analysis. • Semi-structured interviews. • (Possible) roundtable discussions.

	Degree to which the government' stated intention to establish a government statutory Media Council (Independent Media Council) might impact on sustainability.		
Gender equality and the HRBA			
11. Were gender equality and the HRBA integrated into the design and implementation of the programme, and what results did this lead or contribute to?	- No. and type of activities specifically targeting gender equality. - No. and type of activities to assist partners / media houses etc. to mainstream gender equality reported. - Degree to which gender equality mainstreamed across activities and outputs. - Degree of sex-disaggregation in MCT data and reporting. - Level of compliance with the HRBA in design and implementation.	- Programme documents (including programme data and any gender-specific plans / training materials). - Key informants.	- Document analysis. - Semi-structured interviews. (Possible) roundtable discussions.

Appendix 2: Documents consulted

MCT Annual Reports

- Media Council of Tanzania Narrative Annual Report (2018)
- Media Council of Tanzania Narrative Annual Report (2019)
- Media Council of Tanzania Narrative Annual Report (2020)
- Media Council of Tanzania Narrative Annual Report (2021)
- Media Council of Tanzania Narrative Annual Report (2022)
- Media Council of Tanzania Narrative Annual Report (2023)
- Media Council of Tanzania Narrative Semi-Annual Report (January – June 2024)

MCT Programme Strategies, Logframes, Theory of Change and Organogram

- Media Council of Tanzania Programme Strategy (January 2018 – December 2021)
- Media Council of Tanzania Programme Strategy (January 2023 – December 2027)
- MCT New Strategy 2017 – 2020 Logframe
- Logical Framework for the MCT Programme Strategy (2023 – 2027)
- Media Council of Tanzania Theory of Change for Programme Strategy (2023 – 2027)
- Media Council of Tanzania Organization Chart for Programme Strategy (2023 – 2027)

MCT Publications and Studies

- State of the Media in Tanzania – 2017 – 2018
- State of the Media in Tanzania – 2022 – 2023
- MCT Profile
- Gender in Media Policy – 2019 (English and Swahili versions)
- Challenging the Glass Ceiling: Study of Women in the Newsroom in Tanzania
- Media Freedom in Tanzania Today: A Qualitative Study on the Freedom of the Press Under President Samia Suluhu Hassan, 2021-2023. Lycke Holmén. UPPSALA UNIVERSITY
- The Right to Information in Tanzania: Insights on the Laws, Policies and Practices. CIPESA. January 2015

MCT Proposals, Rules, Manuals and Deed of Trust

- Media Council of Tanzania Constitution 1995, incorporating all amendments by the National General Convention to August 2016.
- Training Manual on Gender and the Media: Media Council of Tanzania: Revised Edition 2021

Grant agreements

- Grant agreement for “Advocacy for Press Freedom and Media Self-Regulatory Project” The Media Council of Tanzania 2018 - 2020. Agreement between Swedish International Development

Cooperation Agency, Sida, Represented Embassy of Sweden in Tanzania and Media Council of Tanzania.

- Amendment No. 1 of the Grant Agreement for "Advocacy for Press Freedom and Media Self-Regulatory Project" The Media Council of Tanzania 2018 - 2020. Agreement between Swedish International Development Cooperation Agency, Sida, Represented Embassy of Sweden in Tanzania and Media Council of Tanzania. (date of signature missing)
- Amendment to the Grant Agreement between the Embassy of Sweden and Media Council of Tanzania. Amendment No. 5. Amending the Agreement of 21.03.2018 for the second time as a no cost extension (04.09.2023)

Appendix 3: Workplan

Preliminary workplan				September				October				November				December				January					February				
2024-25	GM	MG	QA	w36	w37	w38	w39	w40	w41	w42	w43	w44	w45	w46	w47	w48	w49	w50	w51	w52	w1	w2	w3	w4	w5	w6	w7	w8	w9
Inception Phase																													
Start-up meeting, 26 September	0.50	0.25																											
Desk review and methods development	3	1																											
Drafting inception report	4	1																											
QA inception report			1																										
Submission of draft inception report, October 16																													
Inception meeting (virtual) October 25	0.5	0.25																											
Comment to draft inception report, received Nov 12																													
Revision of inception report based on comments	1.0	0.5																											
Submission of final inception report November 13																													
Approval of inception report November 15																													
Sub-total, inception phase:	9.0	3.0	1																										
Data Collection Phase																													
Additional document review	3	1																											
Remote key information interviews (online/telephone)	3	1.5																											
Field visits / Key informant interviews and FGDs	10	10																											
Debriefing/validation workshop December 6	1.5	0.5																											
Participatory learning workshop Tbd	0.5	0.5																											
Sub-total, data collection:	18.0	13.5	0																										
Data Analysis and Reporting Phase																													
Report writing	7.5	2.5																											
QA draft report			1																										
Submission of draft evaluation report January 24																													
Feedback from stakeholders on draft report February 7																													
Finalization of the report	2	0.5																											
Submission of final evaluation report February 14																													
Evaluation seminar (virtual) February 21	0.5	0.5																											
Sub-total, analysis and reporting:	10	3.5	1																										
Total days	37.0	20.0	2.0																										



End Term evaluation of the Media Council of Tanzania (MCT) programme support 2018-2024

The Media Council of Tanzania (MCT) was established in 1995 as a self-regulatory body to oversee and promote media ethics and resolve complaints over media practice. MCT's activities have since expanded to include training and advocacy on laws, policies, and protecting key rights for the media. Sida has supported MCT for over 10 years, with core funding to 2017 and then to advocacy and arbitration from 2018. Progress on these has been made. Although advocacy in the context is difficult, amendments to key laws have been made and more could be achieved under the current government. The number of complaints formally mediated or arbitrated has declined, but many are resolved informally or dealt with by Press Clubs that MCT helped establish. Sida has also provided staff salaries and administrative costs and has contributed to other MCT outcomes and gender equality. Impact is limited but potential for impact exists. MCT support contributes to sustainability, but it faces a funding gap since Sida funding has ended. Although government is pushing ahead to establish a state media regulatory body, MCT will still have key roles to play.

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