



2025:12

Sida Decentralised Evaluation

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Midterm Performance Evaluation of the Program Participatory Action against Corruption: Towards Transparency and Accountability

Final Report

Midterm Performance Evaluation of the Program Participatory Action against Corruption: Towards Transparency and Accountability

**Final Report
October 2025**

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Sida Decentralised Evaluation 2025:12

Commissioned by Sida, Embassy of Sweden in Dhaka, Bangladesh

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Date of final report: 2025-10-21

Art. no. Sida62822en

urn:nbn:se:sida-62822en

This publication can be downloaded from: www.sida.se/en/publications

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Abbreviations and Acronyms

ACC	Anti-Corruption Commission
ACGs	Active Citizen Groups
BDT	Bangladeshi Taka Bangladesh the official currency of country)
CAG	Comptroller and Auditor General
CCCs	Committees of Concerned Citizens
CSR	corporate social responsibility
CSO	Civil Society Organisation
ESP	Education Sector Plan (ESP)
FCDO	Foreign, Commonwealth & Development Office (UK)
FGD	Focus-group discussion
GDPR	General Data Protection Regulation
GESI	Gender Equality and Social Inclusion
HRBA	Human Rights-Based Approach
IACA	International Anti-Corruption Academy
KYC	Know Your Candidate
LGI	Local Government Institutions
M&E	Monitoring and Evaluation
MEL	Monitoring, Evaluation and Learning
MIS	Management Information System.
MoU	Memorandum of Understanding
MTE	Mid-Term Evaluation
NHRC	National Human Rights Commission of Bangladesh
ODA	Official Development Assistance
OECD DAC	Organisation for Economic Co-operation and Development – Development Assistance Committee.
PACTA	The Participatory Action Against Corruption: Towards Transparency and Accountability

ABBREVIATIONS AND ACRONYMS

PWD	Person with Disabilities
SDC	Swiss Agency for Development and Cooperation
SDG	Sustainable Development Goal
Sida	Swedish International Development Cooperation Agency
SMART	Specific, Measurable, Achievable, Relevant, and Time-bound
SWOT	Strengths, Weaknesses, Opportunities, and Threats
ToC	Theory of Change
TIB	Transparency International Bangladesh
UNDP	United Nations Development Programme
UNCAC	United Nations Convention Against Corruption
UNEG	United Nations Evaluation Group
USAID	United States Agency for International Development
USD	United States Dollar
YES	Youth Engagement and Support groups

Preface

This report presents the findings of the independent evaluation of the project “*Promoting Accountability and Civic Transparency through Anti-Corruption Initiatives*” (PACTA), implemented by Transparency International Bangladesh (TIB) and funded by Swedish International Development Cooperation Agency (Sida), Swiss Agency for Development and Cooperation (SDC), Foreign, Commonwealth & Development Office (FCDO) and the Netherlands.

The evaluation was conducted between June to September 2025 and responds both to accountability requirements and to a growing need for evidence-informed decision-making in a constrained funding environment. The evaluation was conducted by:

- Ms. Bunafsha Gulakova, Team leader; and
- Mr. Khaled Ehsan, Senior National Expert

Mr. Graham Haylor provided quality assurance advice. Ms. Castro Neiderstam, First Secretary – Human Rights, Democracy and Gender Equality, managed the evaluation at the Embassy of Sweden in Dhaka.

The authors would like to acknowledge and thank all of those who gave their valuable time to contribute to the evaluation.

The evaluation was designed not only to **assess the performance of PACTA** using the OECD-DAC criteria of relevance, effectiveness, efficiency, and sustainability, but also to support strategic planning related to the **downsizing and repositioning** of the programme. Given the anticipated resource shortfalls and institutional uncertainty, a key objective of the assignment was to help TIB examine viable models for scaling down while preserving core programme functions and values. This forward-looking component required the evaluation to go beyond conventional performance assessment and engage in scenario analysis, strategic foresight, and cost-benefit analysis to inform organisational decision-making.

The evaluation took place during a politically sensitive period in Bangladesh, marked by shifting civic space, leadership transitions in key oversight bodies, and ongoing budgetary constraints. These contextual factors affected both the implementation of PACTA and the conduct of the evaluation. Nonetheless, the team was able to consult a wide range of stakeholders, including TIB staff, civic groups, volunteers, development partners, and selected government interlocutors. Mixed methods were used, combining theory-based and realist-informed approaches with participatory inquiry, strategic consultation and a SWOT exercise.

A total of 132 individuals participated in interviews conducted as part of this evaluation. Of these, 43 were women and 89 were men. By stakeholder category, the distribution of interviewees was as follows:

- Government Institutions: AC Land, UH&FPO, SACMO at Maduhupur and Deputy Commissioner at Nilphamari. 8 individuals
- Board of Trustees, Transparency International Bangladesh: 5 individuals
- Transparency International Bangladesh (Head of Office staff): 48 individuals
- Community-based Stakeholders (CCCs, ACGs, YES) and government officials (AC Land, UH&FPO, SACMO at Maduhupur and Deputy Commissioner at Nilphamari) groups across Cumilla, Madhupur, Rangpur, and Nilphamari): 60 individuals
- Journalists and Media Stakeholders (including TIB Investigative Journalism award winners and judges): 10 individuals
- Donors, Development Partners, and External Consultants: 6 individuals

1,222 responses from volunteers across Active Citizen Groups (ACG), Committees of Concerned Citizens (CCC), and Youth Engagement and Support groups (YES) groups, representing an unexpectedly high response rate of 98 percent were collected and informed the present report. Women made up approximately 47.3 percent of the respondents, and men 52.7 percent.

This report is intended for Sida, Swiss Agency for Development and Cooperation (SDC), Foreign, Commonwealth & Development Office (FCDO), the Netherlands and TIB, and other stakeholders involved in governance, accountability, and anti-corruption work in Bangladesh. It aims to inform decisions on the future of PACTA, offer practical guidance on how to manage downsizing without undermining programme impact or legitimacy, and contribute to broader reflections on sustainability and civic engagement under tightening resource conditions.

The evaluation team acknowledges the valuable insights shared by all participants and expresses gratitude to the TIB Secretariat and field teams for their cooperation and transparency throughout the process.

Executive Summary

Purpose and Intended Audience

This mid-term evaluation of the Promoting Accountability and Transparency in Local Governance (PACTA) programme was commissioned to assess its progress, effectiveness, and strategic relevance in Bangladesh's evolving governance context. The purpose was to generate evidence-based insights for Sida and Transparency International Bangladesh (TIB) to inform decisions on future programming, especially in view of financial constraints and the need for potential downsizing. The intended audience includes Swedish International Development Cooperation Agency (Sida), Swiss Agency for Development and Cooperation (SDC), Foreign, Commonwealth & Development Office (FCDO) and the Netherlands. TIB management, civil society actors, and other stakeholders engaged in governance reform and anti-corruption efforts in Bangladesh.

Objectives and Description of the Intervention

PACTA aims to strengthen citizen-led accountability in service delivery and local governance through grassroots mobilisation, policy advocacy, and digital innovation. The programme operates through community structures such as Committees of Concerned Citizens (CCCs), Active Citizens' Groups (ACGs), Youth Engagement and Support (YES) groups, and digital platforms such as PACTApp. It supports civic oversight and aims to enhance responsiveness and integrity across a number of sectors that include health, education, land management, environmental governance and construction. The last two sectors are relatively new areas of work for TIB and are generally considered as “cross-cutting”. As rationalized in the Inception Report, the evaluation addressed four OECD-DAC criteria—relevance, effectiveness, efficiency, and sustainability—and also explored strategic options for downsizing the programme to adapt to anticipated funding reductions.

Methodology

The evaluation applied a mixed-methods approach grounded in theory-based and utilisation-focused evaluation principles. Methods included desk review of programme documentation, structured interviews and focus groups, case studies, and a national level survey with 1222 responses. The team used realist-informed inquiry to assess the contribution of various interventions across different contexts and applied scenario analysis to assess feasible pathways for programme restructuring. Cross-cutting issues such as gender equality, digital inclusion, civic space, and human rights-based approaches were integrated throughout.

Main Conclusions

Within the timeframe covered by the evaluation, TIB played a visible and active role in shaping policy debates in Bangladesh. Many of its criticisms and recommendations influenced revisions (or at least public scrutiny) of key bills/laws. Drawing on citizen-generated data and

targeted policy research, TIB influenced over eight national policy changes and at least fifteen documented shifts in institutional practice. These included reforms in procurement, land services, NGO oversight, education, and environmental governance.

These efforts helped to ensure that issues like privacy, freedom of speech, judicial oversight, and protection of civil liberties stayed on the policy agenda. Some tangible policy outcomes occurred (name changes, circulars in education, re-evaluation of rules etc.), though many demands remained unfulfilled.

PACTA has made important contributions to local accountability mechanisms in Bangladesh. Its grassroots model has generated thousands of complaints and advocacy actions that, in many cases, led to concrete administrative responses. Advocacy was bolstered by data from platforms such as PACTApp and Know Your Citizen (KYC), which helped frame issues for media, civil society, and public authorities. Notable examples include the adoption of procurement reforms following research on e-GP market concentration and the Ministry of Education's use of grievance data to inform service delivery adjustments.

The programme is well aligned with national frameworks, including the National Integrity system, SDG and the ACC Strategic Plan, which enhances its relevance and legitimacy.

PACTA's strength lies in its community-based approach, inclusive civic engagement, and integration of digital tools. It enabled public monitoring and grievance redress, particularly for women, youth and marginalised groups. Human rights-based principles were reflected throughout programme design and implementation.

However, the evaluation identified several structural limitations. The monitoring system remained focused on outputs and was not sufficiently equipped to assess outcome-level changes such as institutional responsiveness or reductions in corruption. Learning from field-level results was not systematically used to inform strategic decisions, and the MEL function lacked dedicated resources and integration.

The programme has been severely affected by financial shortfalls. A funding gap of approximately USD 1.3 million led to the suspension of outreach and research activities, and forced reliance on internal staff resources. While cost-control measures allowed operational continuity, they reduced flexibility and innovation. Moreover, PACTA's dependency on donor funding and the absence of strong institutional partnerships with the state pose risks to long-term sustainability.

The project delivered strong and interlinked results across all three components, effectively mobilising Active Citizen Groups to monitor and report corruption at the grassroots level, generating evidence-based advocacy through app-enabled sectoral research, and reinforcing national reform efforts by strengthening TIB's institutional role as a catalyst for anti-corruption and good governance.

The evaluation confirmed that downsizing is both necessary and feasible. Among the three strategic options analysed, staff reduction, programme redesign, and systemic change—programme redesign presents the most balanced approach. It would allow the retention of core

functions while introducing cost-efficiency. Staff reduction alone would undermine impact, while systemic change requires greater resources but could enhance sustainability in the long term.

Recommendations

1. Strengthen the MEL system to monitor outcome-level changes and institutional responses, and to generate evidence for strategic decisions through a needs assessment exercise. This can help to identify gaps in the current M&E practices and define requirements for the new M&E system that should include engaging with key stakeholders to assess institutional and human resource capacity needs, including for M&E education and training. However, given the relational and participatory nature of civic mobilisation, these models should retain space for periodic in-person engagement to sustain trust, mobilisation momentum, and community responsiveness.
2. Prioritise core functions such as community engagement, advocacy, and evidence-based research, and reduce or phase out non-essential components.
3. Adopt leaner delivery models including regional hubs, hybrid digital approaches, and volunteer-led implementation to reduce costs.
4. Redesign the programme structure to align with available resources, preserving its institutional credibility and public legitimacy.
5. Diversify funding by exploring CSR, domestic partnerships, and alternative financing models to reduce dependence on external donors.
6. Institutionalise successful tools and practices within local governance systems to support sustainability and scale beyond the project cycle.
7. Use downsizing as an opportunity to consolidate gains, strengthen internal systems, and
8. Prepare for a more resilient operational model.

Lessons Learned

- **Programme credibility is built on local legitimacy.** PACTA's acceptance and influence stemmed from its strong presence at the grassroots level, which enabled sustained engagement with communities and service users. However, this legitimacy must be matched by flexible programme design and adaptive learning to respond to emerging governance challenges.
- **Digital tools require meaningful institutional links.** While PACTApp provided a user-friendly grievance mechanism, its long-term effectiveness depends on the responsiveness of institutions. The lack of systematic follow-up and data use by service providers currently still limits the tool's transformative potential.
- **Monitoring systems must go beyond activity tracking.** The absence of a robust outcome-oriented MEL framework constrained the programme's ability to demonstrate systemic

change, measure behavioural shifts among duty bearers, and support adaptive management.

- **Financial vulnerability undermines innovation and scale.** Resource constraints had a direct impact on the programme's outreach, learning functions, and long-term planning. A narrow funding base limits not only operational capacity but also strategic foresight. In addition to resource constraints, TIB had to contend with internal capacity issues, unpredictable and inconsistent government policies and regulations, continuous political interference and donor priorities and agendas that limited its ability to focus on long-term strategic goals like replication and scaling up.
- **Downsizing** is not simply about cost-cutting. It requires careful prioritisation, transparency with stakeholders, and a forward-looking strategy to preserve core functions while managing institutional risks.
- **Social mobilization is a dynamic, community-driven process that goes beyond fixed project timelines and goals.** It requires flexibility, allowing communities to develop their own strategies, adapt to evolving needs, and sustain momentum independently. This evolution necessitates moving beyond the structured parameters of a single project like PACTA to build intrinsic community capacity and ownership.

Best Practices

- Community-embedded structures (CCCs, ACGs, YES groups) proved effective in mobilising civic action, collecting evidence of malpractice, and facilitating dialogue between citizens and authorities. Their sustained presence enabled local ownership and accountability.
- Integration of digital grievance tools (PACTApp) expanded access to complaints mechanisms, especially in remote or underserved areas. When combined with advocacy and follow-up, the tool enabled service corrections and administrative responses. The first-hand evidence for the evaluation team included the Madhupur FGD with the three categories of volunteers who strongly represented the indigenous minority communities. However, the perception of "remoteness" in Bangladesh is complex; while the Madhupur region is located just 80 km from Dhaka, the tribal communities experience a different kind of isolation due to factors like lost land rights, limited market access, and historical government policies, which have created significant socio-economic and cultural challenges for them. The evaluation team was also given access to the PACTApp to review volunteer feedback coming from different parts of the countries, which included certain remote coastal areas of Bangladesh, alongside other regions, identifying governance challenges – like deforestation and environmental protection issues impacting people's livelihoods, and seeking changes.
- Multi-level stakeholder engagement, including civil society platforms such as the Human Rights Forum and Right to Information Forum, ensured a broader evidence base and strengthened linkages between local grievances and national policy dialogue.

EXECUTIVE SUMMARY

- Human rights-based approaches, especially attention to participation, non-discrimination, and accountability, were consistently applied across components and contributed to increased visibility for women, ethnic minorities, and youth in governance processes.
- Scenario analysis for restructuring enabled evidence-based decision-making on future strategic options. The process clarified trade-offs and helped identify a viable path forward amid fiscal constraints.

1 Introduction

The mid-term evaluation of the "Promoting Accountability and Transparency in Local Governance" (PACTA) project was commissioned to assess the project's performance against its intended results, focusing on relevance, effectiveness, efficiency, sustainability, and coherence, while integrating cross-cutting themes such as gender equality, human rights, disability inclusion, and the principle of leaving no one behind. The evaluation was conducted at a critical juncture in the project cycle, in light of funding constraints and the need to explore viable options for future programming.

Implemented by Transparency International Bangladesh (TIB), the PACTA project operates in a complex and evolving governance landscape, characterised by decentralisation, persistent corruption risks, and rising public demand for transparency and accountability. The project engages with a diverse range of actors, including Committees of Concerned Citizens (CCCs), Active Citizens' Groups (ACGs), Youth Engagement and Support (YES) groups, and public institutions across selected districts. Its tools and approaches, such as citizen monitoring, public hearings, the PACTApp digital grievance platform, and local advocacy aim to empower citizens, enhance institutional responsiveness, and strengthen community-based accountability mechanisms in sectors such as education, health, land management, environment and construction.

PACTA is aligned with key national frameworks, including the National Integrity system, the Anti-Corruption Commission's Strategic Plan, and relevant sectoral policies. It also contributes to Bangladesh's commitments under the Sustainable Development Goals (SDGs), particularly SDG 16 on peace, justice, and strong institutions.

1.1 PURPOSE AND SCOPE

The purpose of this evaluation is two-fold: first, to assess the programme's performance between 2022 and mid-2025 in terms of progress, challenges, and emerging results; and second, to provide strategic recommendations to inform decision-making on the programme's potential downsizing, restructuring, or continuation beyond 2026. This independent Midterm Performance Evaluation of PACTA, commissioned by the Sida via the Embassy of Sweden, Dhaka, Bangladesh, is timely in the sense that the country is now at a critical juncture, facing both political and economic challenges while also navigating opportunities for growth. As the country is emerging from a year of significant political upheaval, with a new interim government in place, there is now a sincere, consistent focus on how best to restructure the major institutions of governance that are inherently corrupt.

These include the constitution, the public administration, the judiciary, the police, the ACC and the Election Commission as well as the Health Sector Reform Commission, Local Government

Reform Commission, Media Reform Commission, Women's Affairs Reform Commission, and Labour Rights Reform Commission. For this purpose, it has formed a number of commissions to recommend the required reforms. While it is not conceivable that a government riding the wave of a popular upsurge would be able to fix all national institutions overnight, what is important is that there is now renewed hope, especially among the young people who represent the majority of the country's population, on the need to tackle the root causes of corruption highlighted earlier.

The purpose of the evaluation is to assess the implementation of PACTA since its inception in 2022 until 2026. It is intended to inform Sida's future approach to its programming through an evaluative analysis that can support planning and decision-making, including through a set of proposed actionable recommendations for consideration by the organisation.

The evaluation is also expected to draw evidence and learning to help reflect on broader trends in the ODA environment in Bangladesh, and what they specifically mean for Sida, TIB and other relevant agencies that are likely facing funding cuts in the short term and may need to adapt to a more limited funding environment.

In essence, while the country is moving away from donor dependency, it's a gradual and complex process with ongoing needs for both foreign aid and domestic resources. The focus is on building a more resilient and self-reliant economy while still leveraging aid effectively for specific development priorities. Foreign aid as a percentage of GDP has significantly decreased, dropping to around 2%. This indicates a shift away from a heavily aid-dependent economy in the past towards greater self-reliance. Bangladesh is also trying to increase domestic resource mobilization, including through taxation, to fund development initiatives, and there is now a growing emphasis on attracting private sector investment in social development and climate-related initiatives, with the government providing policy incentives to encourage this. External donors have also shifted their focus in sync with these developments.¹ With this context in mind, this evaluation has three specific objectives:

Assess the effectiveness, relevance, efficiency, and sustainability of PACTA's interventions, which aim to identify governance challenges in local level service delivery institutions by engaging citizen groups, thus promote transparency, accountability, and anti-corruption measures under the PACTapp monitoring.

Provide concrete options for operational/organisational structure and process for downsizing the PACTA program as a result of wider budget cuts, reflecting costs and benefits of different approaches. These options should think through how to sustainably transition the

¹ 2025 Monitoring Report Bangladesh, Committee for Development Policy, UN February 2025; also see the UN Sustainable Development Cooperation Framework (UNSDCF) 2022-2026 for Bangladesh.

PACTA programme and the work of TIB to a smaller scale, and consider how to achieve impact, prioritise, and maintain quality outputs.

Provide actionable recommendations for PACTA programming in the coming two years and beyond, taking into consideration the changing funding and donor landscape.

The evaluation will also incorporate PACTA's Theory of Change logic around the three interlinked dimensions, namely, Sphere of Control, Sphere of Influence and Sphere of Concern, using an inclusive, participatory approach with due consideration to gender and communities' composition in the programme's target areas.

1.2 THE SCOPE AND USER OF THE EVALUATION

The scope of the evaluation will include assessing how PACTA outputs have contributed to the three intended outcomes, as well as their linkages with the current national priorities on governance reforms. Hence, the timing is strategic to identify results and use the evidence to define lessons learnt that can assist TIB, with actionable recommendations, to adapt itself organisationally and programmatically to the changing funding environment, including downsizing, as well as identify emerging capacity needs. Throughout the evaluation, we will work in close partnership with TIB and the consortium to ensure the process is both useful and constructive supporting a sustainable transition of the PACTA programme and TIB's broader work to a smaller scale, while taking into account the mission, core strengths, and added value, and laying the groundwork for continued relevance and influence in a changing context.

The primary users of this evaluation are: The Swedish Embassy in Dhaka; Transparency International Bangladesh (TIB); The consortium members: FCDO, Sida, the Netherlands, SDC, OSF and TIB. **Other important stakeholders** of the evaluation include: All relevant partners in Bangladesh working in the field of Anti-corruption.

1.3 APPROACH AND METHODOLOGY

1.3.1 Evaluation Design and Approach

The Evaluation Team implemented a three-pronged methodological framework:

- Theory-based evaluation was used to test PACTA's Theory of Change (ToC) by tracing causal pathways between interventions, intermediate outcomes, and systemic change. The team assessed the plausibility and coherence of the ToC within the specific governance context of Bangladesh, examined the logic and temporal sequencing of if-then linkages, and identified potential breakdowns in assumptions or pathways. This helped assess the programme's capacity to support change across its three defined outcomes and its alignment with the MEL framework, indicators, and data systems.
- Realist-informed inquiry was applied to understand what worked, for whom, under what conditions, and why, particularly across diverse governance settings in Bangladesh: health, education, medical sectors.

INTRODUCTION

- Scenario analysis and strategic foresight were used to generate forward-looking recommendations and explore feasible options for programme recalibration, institutional continuity, and sustainable scale-down.

The evaluation was grounded in the OECD-DAC criteria: relevance, effectiveness, efficiency, and sustainability, while also responding to the operational imperatives of downsizing and strategic repositioning of PACTA in a constrained funding environment.

A mixed-methods approach was adopted to ensure comprehensive data triangulation and stakeholder representation. The evaluation team employed a combination of qualitative and quantitative tools, including:

- Document review, covering programme reports, strategic plans, MEL data, and policy frameworks relevant to anti-corruption, governance, and decentralisation in Bangladesh.
- Key Informant Interviews with TIB staff, national and local government officials, CCC, ACG and YES members, journalists, and members of the TIB Board of Trustees.
- Field visits to four PACTA implementation areas (Cumilla, Madhupur, Rangpur, and Nilphamari), which included direct consultations and community-level observations.
- Case studies documenting success stories and challenges related to complaint mechanisms and advocacy outcomes.
- Survey data generated from youth and civic actors participating in YES groups and community structures.
- Digital platform analysis, particularly the use of PACTApp, to assess community engagement, complaint trends, and institutional responsiveness.

The choice of tools reflected both the diversity of stakeholder groups and the practical constraints posed by the political transition, access limitations, and security considerations. For example, remote interviews were prioritised for national-level actors and where logistical or digital access barriers existed.

Qualitative data were analysed using thematic pattern analysis, drawing on coding and clustering techniques to identify recurrent issues, enabling and hindering factors, and outcome-level reflections. Quantitative survey results were used to complement findings with descriptive analysis, identifying trends and triangulating perceptions with documented outputs and field-level observations.

The survey received a total of 1,222 responses from volunteers across ACG, CCC, and YES groups, representing an unexpectedly high response rate of 98 percent. Given that TIB has slightly over 10,000 volunteers, the response rate reflects the views of approximately 10 percent of the total volunteer base, which provides a statistically meaningful sample for evaluation purposes.

Table 1 Respondents

	ACG	CCC	YES	Total
Female	409	49	120	578
Male	466	71	107	644
Total	875	120	227	1222

The unexpectedly high volume of responses extended the time required for data cleaning and correlation. The survey was conducted through both online and manual formats. While the initial plan was to administer it via a shared link, a considerable number of responses—especially from the ACG group—were submitted manually. Specifically, 45 CCC participants responded in hard copy, and only about 20 percent of ACG members used the online link. This created additional challenges in consolidating and standardising the data.

The survey consisted of 11 questions: 10 closed-ended and one open-ended question inviting suggestions and advice. While online responses were easily compiled through SurveyMonkey, manual submissions required additional effort in data entry and analysis. To avoid duplication, similar comments were consolidated during the qualitative data review.

1.3.2 Sampling Strategy

The evaluation applied a purposive sampling strategy designed to reflect the programme's geographic diversity, institutional structure, and thematic priorities. Four districts: Cumilla, Madhupur, Rangpur, and Nilphamari were selected in consultation with TIB to represent different governance and implementation contexts. Within these locations, stakeholder groups were selected based on their level of engagement with PACTA activities, thematic relevance (e.g. health, education, land), and potential to provide insights on programme outcomes.

Respondents included government duty-bearers at the upazila and union levels, members of community-based structures (CCC, ACG, YES), media professionals, national civil society leaders, and a wide range of TIB staff across departments. Gender balance and representation of marginalised voices, including women and ethnic minorities, were prioritised in the stakeholder mix.

The sample size was not statistically representative but aimed to capture diversity of experience and perspective, particularly with regard to community engagement, complaint resolution, and the use of digital tools.

The choice of tools reflected both the diversity of stakeholder groups and the practical constraints posed by the political transition, access limitations, and security considerations. For example, remote interviews were prioritised for national-level actors and where logistical or digital access barriers existed.

Qualitative data were analysed using thematic pattern analysis, drawing on coding and clustering techniques to identify recurrent issues, enabling and hindering factors, and outcome-level reflections. Quantitative survey results were used to complement findings with descriptive analysis, identifying trends and triangulating perceptions with documented outputs and field-level observations.

1.3.3 Cross-Cutting Issues and Gender Responsiveness

The evaluation design incorporated cross-cutting issues such as equity, decentralisation, and citizen voice. The methodology engaged directly with TIB's inclusion-focused programming by integrating voices from youth, women, ethnic minorities, and economically disadvantaged groups. However, while gender inclusion was evident in stakeholder representation, the evaluation could have benefited from more explicit application of gender-responsive evaluation tools. Sex-disaggregated data were reviewed where available, but gender-specific indicators and structured analysis were limited.

Throughout the evaluation, the team mainstreamed several cross-cutting dimensions:

- **Gender Equality and Social Inclusion (GESI):** Tools were designed to capture differentiated experiences and outcomes for women, youth, ethnic minorities, and persons with disabilities.
- **Digital Governance:** Particular attention was paid to the role, uptake, and limitations of the PACTApp platform in promoting accountability and strengthening citizen-state engagement.
- **Human Rights-Based Approach (HRBA):** The evaluation assessed the extent to which the programme operationalised principles of participation, non-discrimination, transparency, and accountability.
- **Civic Space:** In light of the post-2024 political context, the team examined the enabling environment for civil society and its implications for TIB's role.

The evaluation also incorporated Sida's five development objectives—poverty perspective, human rights, conflict sensitivity, gender equality and social inclusion, and climate and environment—throughout all stages of the process, adapting tools and analysis to the Bangladeshi context.

1.3.4 Analytical Methodology for Objective 2: Exploring Options for Downsizing

The second part of the assignment did not constitute a conventional evaluation. Rather, it was a forward-oriented, consultative exercise intended to support TIB in navigating an anticipated budget contraction. The analysis focused on identifying viable, structured, and sustainable options for downsizing the PACTA programme.

Recognising that downsizing is a highly contextual and complex process, the evaluation linked this analysis directly to performance data and aimed to explore both the intended and unintended consequences of scale reduction from financial, organisational, and human resource

perspectives. Due to the limited timeframe and scope, this component did not address staff morale, but instead focused on productivity, institutional performance, and long-term implications for programme credibility and sustainability.

The analysis assessed impacts across the following levels:

- Programme structure
- Programme processes
- Individuals (staff, volunteers, youth, and vulnerable groups)

Using available data and findings, the team conducted a cost-benefit analysis to evaluate potential downsizing strategies. This required a cost-optimisation approach to ensure that PACTA could continue to perform effectively with reduced resources. The data analysis followed three stages: data reduction, data display, and drawing conclusions/verification.

1.3.5 Framework for Organisational Analysis: SWOT

A SWOT analysis was used to support decision-making on downsizing options, structured around six key steps:

1. Identifying Internal Strengths
This included core competencies, skilled personnel, and TIB/PACTA's strong public reputation, all of which were considered critical for retention and future programming.
2. Identifying Internal Weaknesses
These included redundant processes, underperforming teams, and limitations of the PACTApp. The evaluation identified areas where streamlining or re-design would yield cost savings.
3. Identifying External Opportunities
These included building on youth mobilisation efforts (YES, CCC, YPAC), leveraging innovation and partnerships, and responding to changing regulatory frameworks.
4. Identifying External Threats
Risks included reduced international donor funding, reputational competition from other actors, and shifting citizen expectations—particularly regarding digital tools like PACTApp.
5. Developing Strategic Initiatives
The team helped prioritise actions such as staff reductions, departmental consolidation, improved resource allocation, and enhanced internal and external communication.
6. Monitoring and Evaluation of the Downsizing Process
Key metrics were proposed to track the impact of any future restructuring on partnerships, funding pipelines, programme assets, and institutional learning.

The methodology under Objective 2 led to the development of three practical downsizing models, each offering different pathways to recalibrate the programme while safeguarding its core mandate, public legitimacy, and operational effectiveness. These models were developed in consultation with TIB leadership, informed by functional mapping, and supported by comparative assessments of financial implications, risks, and trade-offs.

1.3.6 Downsizing Approach

The process began with a detailed review of how PACTA was structured and delivered nationwide, covering thematic areas (health, education, land, construction, environment), delivery mechanisms (ACGs, CCCs, YES, PACTApp), and resource needs. A functional mapping exercise identified which components were essential, optional, or potentially scalable.

This was followed by semi-structured consultations with TIB leadership, senior and mid-level programme staff, MEL officers, and coordinators. Discussions explored institutional priorities, flexibility for change, and ideas under internal consideration (e.g. digital expansion, consolidation of field operations, delegated delivery through partners).

Based on these insights, the evaluation team developed three operationally realistic downsizing models. Each included:

- A proposed geographic footprint
- Priority thematic areas
- Delivery and staffing models
- Degree of digital engagement
- Financial implications
- Transition steps and risk analysis

These models were presented to TIB management for review, feedback, and refinement. The process aimed to support internal alignment and strategic decision-making.

1.4 LIMITATION AND MITIGATION MEASURES

The evaluation team recognised several methodological limitations and contextual challenges that had implications for the design and execution of the evaluation. These challenges were addressed through targeted mitigation strategies to ensure the robustness and credibility of the findings.

The **country's transitional political and institutional context** created a degree of uncertainty, institutional constraints also affected data collection. Due to leadership vacancies at the National Human Rights Commission (NHRC) and budgetary limitations in several state institutions, some key stakeholders identified during the inception phase were not available for participation. As a result, the evaluation's institutional coverage was partially limited. To address this, the evaluation team relied on evidence from non-state actors and decentralised civic platforms such as Committees of Concerned Citizens (CCCs), alongside development

partners. Additional stakeholders, including the Human Rights Forum Bangladesh, Right to Information Forum (coordinated by Manusher Jonno Foundation), and the SDG Platform were included to broaden the evidence base.

One of the key limitations was the **absence of a gender question in the survey tool**. To obtain gender-disaggregated data, the evaluation team followed up with group coordinators and volunteers, who verified the gender distribution separately for ACG, CCC, and YES participants.

Time zone differences and scheduling constraints posed further logistical challenges. The evaluation team mitigated this by planning interviews well in advance, using asynchronous methods such as recorded responses and email correspondence when necessary.

Finally, virtual interviews limited the team's ability to observe non-verbal cues, which can be essential for interpreting emotions and stakeholder sentiments. To overcome this, the team used supplementary methods such as follow-up written responses, additional interviews, and reviews of recorded sessions to deepen its analysis.

2 The Evaluated Intervention

2.1 THE PARTICIPATORY ACTION AGAINST CORRUPTION – TOWARDS TRANSPARENCY AND ACCOUNTABILITY (PACTA) PROGRAMME

PACTA is implemented by Transparency International Bangladesh (TIB) AND was launched on 1 January 2022 for a five-year period with co-funding from the UK's Foreign, Commonwealth & Development Office (FCDO), Swedish International Development Cooperation Agency (Sida), the Swiss Agency for Development and Cooperation (SDC), the Netherlands and subsequently USAID. PACTA aims to reduce corruption and increase transparency in Bangladesh through empowering citizens. The strategic objectives are aimed at:

- (a) identifying governance challenges in local level service delivery institutions by engaging citizen' groups for effective change through the Youth Engagement and Support (YES) groups, the Committees of Concerned Citizens (CCC) and the Active Citizen Groups (ACGs),
- (b) reforming laws, policies, processes, practices, and accountability mechanisms in targeted institutions through research and advocacy, and
- (c) creating a feedback loop for monitoring, evaluating and addressing governance challenges by drawing on evidence generated from the national data platforms.

The intervention is designed to facilitate the participation of citizens, especially the youth, to demand better services and foster greater social accountability using an innovative digital tool for community-level monitoring. This is done through a digital tool called the “PACTApp” used to gather feedback from community level monitoring and collect evidence on corruption **from selected sectors (health, education, land, environment and construction**. Based on the evidence collected on corruption incidents, the programme is trying to reinforce policy advocacy and engagement at different levels.

The three main outcomes define the overall structure and focus of the intervention, with each having sub-components to effectively address corruption and governance challenges.

Citizen empowerment emphasises the mobilisation and capacity building of Active Citizen Groups (ACGs), CCC, YES, and especially marginalised populations, to demand corruption-free services that involve ACG formation, training, and the implementation of community monitoring using the PACTApp.

Institutional and policy reforms, the second outcome, centres on targeting the reduction of corruption in key sectors - education, health, land, environment, and construction - through advocacy and operationalising app-based monitoring tools. Sub-components include the

generation of sectoral reports, influencing national policies, and implementing evidence-based advocacy campaigns.

Strengthening the anti-corruption movement, the third outcome aims to enhance TIB's role as a national catalyst. This involves fostering institutional collaborations and networks, building organisational capacity, and developing sustainable financial resources. Together, these outcomes and their components are expected to help integrate citizen action, institutional accountability, and policy advocacy to achieve systemic change in the country. As such, they have the potential to contribute to the achievement of the Sustainable Development Goals (SDGs) in general and SDG 16 on peace, justice, and strong institutions in particular.

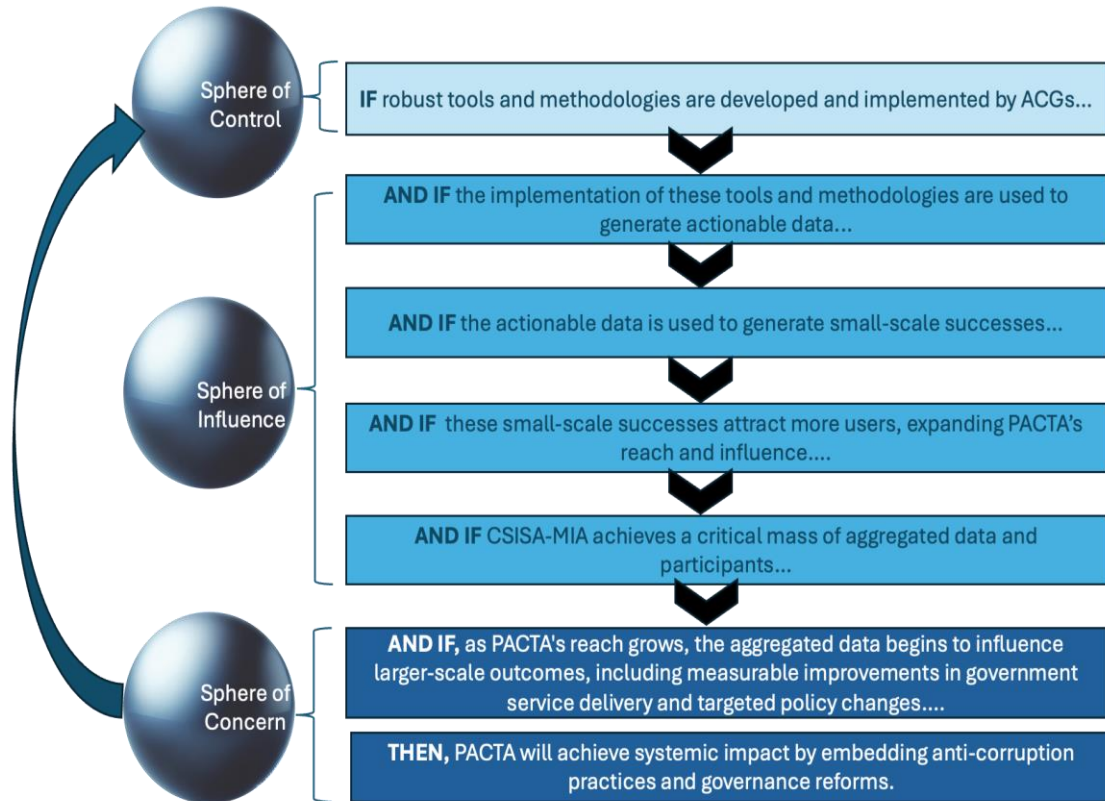
2.2 PACTA'S THEORY OF CHANGE (TOC)

PACTA's Theory of Change (ToC) is based on three interlinked spheres:

1. *Sphere of Control*: Refers to foundational tools and methodologies, such as the PACTApp, to enable systematic data collection and problem identification by Active tizen Groups (ACGs). These tools are designed to gather actionable insights from the community level, with a focus on the key sectors highlighted above.
2. *Sphere of Influence*: Using the data and insights generated, core actors (CCC, YES and ACGs) engage with local authorities and service providers to address identified governance gaps. This process of community-driven advocacy and problem-solving creates measurable improvements in service delivery and governance practices, encouraging greater participation from both citizens and institutions.
3. *Sphere of Concern*: As the number of participants and institutions involved increases, the aggregated data and successful interventions become a basis for broader advocacy efforts at the national level. These efforts aim to influence policy reforms, institutional practices, and the overall governance landscape in Bangladesh.

The ToC includes a continuous feedback loop where the results achieved at each stage inform and enhance the tools, methodologies, and strategies employed in subsequent stages, allowing PACTA to remain adaptive and effective in addressing emerging governance challenges.

Table 2 Pacta's Theory of Change



PACTA operates across 45 Committees of Concerned Citizens (CCCs) strategically distributed throughout 43 districts of Bangladesh, covering a diverse range of geographic, socio-economic, and governance contexts, i.e. urban, peri-urban, and rural areas across eight divisions, including Dhaka, Chattogram, Sylhet, Khulna, Rangpur, Mymensingh, Barishal, and Rajshahi. These locations reflect a mix of metropolitan hubs, such as Dhaka and Chattogram, where governance challenges are influenced by rapid urbanisation, and more rural and marginalised areas like Dinajpur and Rangpur, where service delivery and citizen engagement issues are often exacerbated by limited infrastructure and resources.

The project also targets regions with distinct socio-economic profiles, such as Sylhet, known for its remittance-driven economy, and Khulna, characterised by its proximity to coastal zones and climate-related governance challenges. The programme has empowered at least 18,283 citizens from these areas to help them raise their voice and take action.² In addition, at least a million poor women and men are expected to directly benefit through civic engagement in specific regions, sectors and institutions. Indirectly, it is expected to benefit the wider

² TIB Annual Report 2023-2024, p.32.

population of Bangladesh, as the systems strengthening intervention is likely to have a nationwide impact.

The programme appears to have taken a pragmatic approach to changing circumstances that followed from the August 2024 Revolution in Bangladesh and redirected some resources to new opportunities that arose with changed political circumstances. Such flexibility enabled the programme to grasp opportunities to build relevant policy formulation capacities as the context changed. However, the significant funding cut currently envisaged means that TIB has no other option but to downsize its operations, which is a complex issue with far-reaching consequences for both PACTA and the populations it serves. Addressing the impending funding cuts also necessitates a collaborative effort involving the organization, government, civil society, and other stakeholders to identify and pursue new funding opportunities. This approach requires exploring various avenues, including diversifying funding sources, leveraging partnerships, and advocating for increased support from the state as well as international organisations, such as the UN.

2.3 THE OPERATING CONTEXT OF PACTA

Corruption and its overall impact on Bangladesh's ability to promote human development, is now considered a critical factor impeding development. It has impacted economic growth by limiting foreign investment. It has limited the distribution of wealth and resources, the impact of which is especially seen on marginalised groups across the country. At the level of the state, weak public institutions have eroded public confidence in government and put various barriers in the way of good governance. An Anti-Corruption Commission (ACC) was set up in 2004 that investigates and prosecutes corruption cases. Soon after acceding to the UNCAC in 2007 the government had made some progress towards implementing the convention, including adopting the Anti-Corruption Rules in 2007, the Right to Information Act in 2009 and the National Integrity Strategy in 2012.

Over the last decade, the government had espoused a zero-tolerance policy towards corruption, focusing on i) strengthening the ACC as it plays a crucial role in investigating and prosecuting corruption cases, ii) Judicial Reform, iii) strengthening the Comptroller and Auditor General (CAG), media, and the private sector since they also play a vital role in monitoring and reporting on corruption, iv) public management and policy reform, i.e. improving public financial management, procurement processes, and other administrative procedures to curb corruption, v) public access to information (RTI Act-2009) to promote transparency and accountability, vi) digitalisation of government services to streamline the services and reduce bureaucratic delays, and vii) engaging citizens and promoting accountability through various corruption prevention committees at local levels. In addition to these initiatives, investigative journalism made some contribution in exposing corruption in the country. All these efforts have no doubt helped to create greater public awareness about the breath and scope of corruption and the importance of accountability in fostering a culture of integrity. However, the implementation and enforcement of these initiatives are extremely weak and the structural

barriers to significantly reduce corruption remain strong. The government has not been successful in addressing the underlying factors that contribute to corruption, such as:

- Weak governance, lack of transparency, and inadequate accountability mechanisms in most state institutions;
- Reducing illicit financial flows, holding high-profile political actors embroiled in various corruption and embezzlement scandals accountable and strengthening the recovery and return of stolen assets, and;
- Promoting Inclusive Development in a real sense, where anti-corruption policies are mainstreamed for sustainable and equitable progress.

Addressing these root causes is crucial for long-term success. PACTA's pre-emptive strategic approach, which emphasises transparency, accountability and ethical behaviour, is particularly suited to address the root causes of corruption before it surfaces. This shift in the process of combating corruption underscores the need for a comprehensive strategy that tackles this vice at multiple levels: macro, organisational, and individual. Although not always smooth-sailing, PACTA's comprehensive approach provides good practice examples of how government and civil society can effectively work together to significantly reduce corruption.

“Prioritising public interest will help realisation in the government that they do not always have all the answers and need to engage with and listen to the people. It would necessitate unhindered scope of people to raise voice for accountability. Space must be enhanced, not curtailed, for civil society and media to exercise their rights and responsibilities as enshrined in the Constitution, so that power is consistently held to account. Failure to do so will further perpetuate corruption and social exclusion and render the development aspirations meaningless for the common people.”³

It is a given that PACTA's external funding will decline in the coming years. Bangladesh's graduation to “developing country” status⁴ from “least developed country” towards the end of 2026 means that it will not be eligible for certain types of development aid and grants from most bilateral donors, some of which have supported TIB for decades.⁴ Furthermore, a significant level of USAID funding to Bangladesh, which is also a key donor for TIB, was reduced by President Trump's executive order in early 2025 to reevaluate and realign US foreign aid globally. These developments have huge financial implications for TIB.

This anticipated decline will affect programme implementation and operations, making it difficult for PACTA to meet its obligations and achieve its goals. This calls for substantive downsizing of the intervention without compromising on quality. In this context downsizing requires looking at alternative options for promoting rights-based or social mobilisation initiatives, strengthening the internal governance of PACTA, including its financial

³ Iftekharuzzaman is Executive Director, TIB. The Daily Star, February 13, 2022.

⁴ <https://www.un.org/ldcportal/content/bangladesh-graduation-status>

management, decision-making processes, and reporting systems and to assess what would be best and/or feasible for the organization. It also needs to ensure operational efficiency and greater alignment and coordination with other government and non-governmental anti-corruption measures being implemented in its target areas and elsewhere because effective anti-corruption efforts require a comprehensive approach and cannot be achieved in isolation.

Corruption is a systemic issue with deep roots in various sectors and requires a multifaceted response. Actions need to involve collaboration between different actors, including government agencies, civil society, the private sector, and the public. TIB has continued to raise concerns about the potential dangers of politicizing anti-corruption efforts in Bangladesh. TIB's analysis indicates that while the previous government had publicly declared a zero-tolerance policy towards corruption, there was a lack of genuine implementation and an environment where corruption was widely tolerated through systemic issues like legal loopholes, unchecked authority, and the exploitation of public resources for personal and political gains.⁵

Last, but not least, TIB needs to explore diverse funding sources beyond government and foreign donors by leveraging social enterprises to create sustainable models and generate its own revenue.

2.4 STAKEHOLDERS ANALYSES

The stakeholder environment of the PACTA programme is defined by a wide constellation of actors operating at national and subnational levels with varying degrees of influence, interest, and alignment with anti-corruption objectives. At the core of implementation are the 45 CCCs, YES, ACG and Area Coordinators. Their role is central to civic engagement, community-level monitoring, stakeholder management, report writing, the transmission of governance concerns to higher levels and capturing results. As decentralised structures with high contextual awareness, CCCs are positioned as key interlocutors for data collection and stakeholder validation and Area Coordinators playing a facilitating role.

National institutions with formal mandates in the areas of transparency, accountability, and rights protection, including the Anti-Corruption Commission, Information Commission, and National Human Rights Commission⁶, are considered primary institutional stakeholders. However, at the time of this evaluation, the last two mentioned institutions are not operational.

Their interest in the programme is policy-driven and linked to PACTA's objectives of institutional reform and public sector accountability. Selected officials from these institutions

⁵ "Anti-corruption efforts will fail without change in political, bureaucratic culture: Iftekharuzzaman" – Prothom Alo English, 8 December 2024. <https://en.prothomalo.com/bangladesh/5gnouspdbp>

⁶ The members of Bangladesh's National Human Rights Commission, including Chairman Kamal Uddin Ahmed and the five full-time members, resigned on 7 November 2024, and as of mid-2025 no new leadership has been appointed, leaving the commission vacant

are identified as active champions of the initiative, particularly in the health, education, land, construction, and environmental sectors. These sectoral institutions are both implementing counterparts and direct targets of civic monitoring efforts, and their cooperation is essential for assessing programme effectiveness and responsiveness.

The media holds a structurally important role, both as a dissemination partner and as a generator of investigative content that complements TIB's local-level evidence. Engagement with journalists at local and national levels is critical for understanding of programme visibility and capacity to trigger institutional responses.

Development partners, who are leading donors, occupy a dual position of strategic oversight and financial support. Their expectations are aligned with the broader governance and anti-corruption agenda and will inform the evaluation's analysis of coherence, relevance, and value for money.

Youth-based structures such as YES and ACGs, while lacking institutional power, are deeply embedded in civic mobilisation. Their engagement is relevant for assessing community ownership, behavioural change, and inclusivity. These groups, together with other civil society actors and beneficiaries, provide critical perspectives on service delivery, barriers to accountability, and the perceived credibility of TIB's interventions.

By contrast, elected representatives, political actors, and sections of the business community are identified as actors with high influence but low alignment with anti-corruption objectives.

In Bangladesh, local political leaders often view the youth as a crucial voting bloc for upcoming elections. Because of their large numbers, energy, and potential to influence political outcomes, leaders tend to pay closer attention to young people's demands and opinions compared to other demographic groups. This engagement is often motivated by the desire to secure long-term political support and shape future voter bases, making youth issues—such as education, employment, and social development—central to political discourse. But it is common sense that young volunteers – given their exposure to global social media can help to bridge community efforts, foster participation, and enhance the effectiveness of local initiatives through their influence. Their role in the evaluation is less as informants and more as contextual variables that may shape or constrain programme results.

This **stakeholder mapping** provides the **basis for purposive sampling, triangulation**, and analysis of both **formal and informal accountability** dynamics across the governance spectrum. Based on this mapping, a final list of key stakeholders will be developed that may be further divided as *primary* and *secondary* stakeholders.

The primary stakeholders are involved in PACTA's implementation and/or are expected to play an important role in using the evaluation findings:

Programme participants/beneficiaries: Those who directly benefit from the programme's services or activities, including first generation voters in the country and young people in general.

Programme staff: Those who are involved in the day-to-day operations and implementation of the programme.

Programme managers: Those responsible for overseeing the programme including strategic planning, designing, providing necessary support and guidance and ensuring its objectives are met.

The secondary stakeholders are individuals or groups who are less directly involved but still have an interest in the programme and this evaluation. These include:

Funders: Those who provide financial resources for the programme.

Partners: Organizations or individuals who collaborated with the programme.

Policymakers: Those who make decisions that could be influenced by the evaluation findings.

Community members: Individuals or groups who are affected by the programme's broader impact.

Figure 1 Map of stakeholders

Stakeholders and their role in the evaluation		
Stakeholder Group	Role in Evaluation	Engagement Purpose
Transparency International Bangladesh (TIB) (Board of Trustees, Executive Management Team, MEL Unit, Programme Leads),	Programme designers and implementers.	Articulate strategic direction, MEL use, internal learning, experience with adaptive management and digital transition.
Field Coordinators / CCC Facilitators	Local coordinators of ACG activities and digital monitoring tools.	Provide operational insights on citizen engagement, PACTApp utilisation, institutional responsiveness.
Active Citizen Groups (ACGs) CCC and YES	Primary beneficiaries and agents of change.	Share experiences in mobilising communities, monitoring services, using digital platforms, and influencing change.
Service Users (health, education, land, environment, construction)	Ultimate recipients of improved services.	Assess perceived changes in access, transparency, and responsiveness of services.
Senior National Level Government Officials / Local Government Representatives	Interlocutors of ACGs and implementers of service reforms, including senior level national policymakers.	Reflect on behavioural changes, digital tool integration, and institutional uptake of ACG inputs, and national level perspectives about efficacy of TIB's advocacy, policy and research initiatives at institutional levels

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PACTA Donors (Sida, Netherlands, UK, Switzerland) and .	Funders and strategic stakeholders.	Provide insight into expectations, value-for-money considerations, and scenarios for transition and continued support.
Human Rights Forum Bangladesh, an umbrella network of around 30 NGOs covering a wide spectrum of human rights issues. Right to Information Forum. SDG Platform	Peer organisations in the civic space.	Assess complementarity, civic space dynamics post-2024, and sustainability of anti-corruption coalitions.
Media: investigative journalists, bureau chiefs, editors, correspondents, and freelance reporters. They work across different media formats including print, television, online, and international broadcasting.	This range of professional roles, coverage areas, and topics will support a well-rounded understanding of media dynamics relevant to the evaluation.	Thematically, their work covers investigative journalism on governance, corruption, human rights, elections, and civic engagement. Several of them are involved in specialised reporting units or help desks, focusing on accountability and transparency. Others represent editorial leadership, with experience in shaping content strategy, managing newsroom priorities, and engaging with media regulation.

3 Findings

3.1 RELEVANCE

EQ1. To what extent are PACTA’s strategies and interventions responsive to the governance context, stakeholder needs, and national priorities?

EQ1. 2. How well is PACTA aligned with Bangladesh’s current anti-corruption, governance, and decentralisation priorities?

1. Social Movement and Civic Engagement:

PACTA demonstrates strong alignment with Bangladesh’s anti-corruption and governance reform agenda, as set out in key national policy instruments. These include the **National Integrity Strategy** (2012, revised 2021), the **Anti-Corruption Commission’s Strategic Plan** (2021–2025), the **Right to Information Act** (2009), the **Local Government (Union Parishad) Act** (2009), and sectoral frameworks such as the **Education Sector Plan (ESP)** 2021–2025 and the 4th Health, Population and Nutrition Sector Programme (HPNSP) 2017–2022 and [the State Acquisition and Tenancy Act \(1950\)](#), regulating tenancy rights, rent and provisions for land acquisition by the state.

In the **land administration sector**, PACTA-supported CCC advocacy in Madhupur (28 November 2024) led to the formal identification of 16 service-related deficiencies and the submission of eight concrete reform proposals. In direct response, the Assistant Commissioner (Land) issued an instruction on 9 February 2025 mandating all union land offices to implement measures aligned with the **National Integrity Strategy’s provisions** on eliminating discretionary decision-making and promoting access to digital services. A subsequent Land Fair held on 25–27 May 2025 provided further outreach and awareness, consistent with the national Digital Land Services expansion under the Smart Bangladesh Vision 2041.

In discussions with TIB on land administration in Bangladesh, the evaluation team was informed that many rural people “lack awareness of their land rights” due to factors like complex customary and statutory laws, weak legal systems, and patriarchal norms that disadvantage marginalized groups like women. This lack of knowledge makes them vulnerable to displacement, conflict, and economic hardship, as they are less able to protect their land from powerful interests. To date PACTA’s support to land management issues have mostly focused on formal land registration, raising awareness through community engagement, and implementing inclusive land policies that recognize both customary and statutory rights as well

as the negative impacts from ‘different approaches’ being applied by the land and environment ministries respectively.

PACTA has not directly engaged with political leaders even at the local level in view of the fact that the volunteers are “closely identified” with TIB, who fear that they will be “targeted” by local political actors, who may even resort to violence. This has been a “red line” that TIB seems reluctant to cross, although many local volunteers that the evaluation team spoke to indicated that they are willing to directly advocate with local political leaders. This evaluation simply did not have the resources or time to assess the wider challenges being faced by the local land administration agencies, such as the lack of skilled manpower in land administration offices, inadequate internal monitoring systems and lack of transparency, inefficient manual processes that can be prone to corruption, the need for better coordination among different government offices, and most importantly, the slow pace of digitization of land services, such as e-registration, that can significantly curb corruption in this sector.

In the **education sector**, CCC advocacy at Edilpur High School under Madhupur sub-district in November 2024 prompted the Upazila Secondary Education Officer to issue a directive to 36 schools to introduce governance measures such as complaint boxes, updated notice boards, and restrictions on private tuition. This action reflects **PACTA’s contribution to decentralised oversight** and improved school governance, as prioritised in the Education Sector Plan (ESP) for Bangladesh Fiscal years 2020/21 – 2024/25 (10 December 2020, **Result Area 4.1**

In the health sector, the application of citizen feedback and public hearings—such as the event held on 26 September 2024 at Kalirbazar Health and Family Planning Centre in Cumilla—has operationalised the RTI Act and supported the HPNSP’s objectives on service responsiveness and community participation.

TIB through its PACTA initiative has played a critically relevant role by conducting research, monitoring governance, raising public awareness, and advocating for institutional reforms to combat widespread corruption in Bangladesh, despite not directly investigating individual cases.

PACTA’s strategies and interventions are well-suited to Bangladesh’s evolving governance landscape, which is characterised by decentralised service delivery, rising demand for transparency, and persistent challenges related to informal practices and marginalisation. PACTA’s implementation approach is rooted in grassroots civic mobilisation, structured engagement with public institutions, and evidence-based local advocacy has allowed it to adapt effectively to these contextual dynamics. For example, the project’s design is built around Committees of Concerned Citizens (CCCs), Active Citizens’ Groups (ACGs), and Youth Engagement and Support (YES) groups has enabled citizen-led monitoring and institutional dialogue at local levels across health, education, land, and more recently, construction and environment.

PACTA's entry points at the local level have created space for citizen feedback and contributed to both vertical and horizontal accountability in targeted sectors, including health, education, and land administration. This responsiveness is consistent with the 8th Five Year Plan (2021–2025) emphasis on local governance, people-centric service delivery, and inclusive development.

Advocacy for Good Governance and Anti-Corruption:

TIB engaged with policymakers, government agencies, and civil society to highlight corruption risks in key sectors such as health, education, climate finance, and public procurement. It managed to publish “highly credible” policy briefs and research reports that revealed governance gaps and offered recommendations for reforms.

Legal and Institutional Reforms:

TIB has consistently pushed for stronger enforcement of the Right to Information (RTI) Act and advocated for amendments to the Whistleblower Protection Act of 2011 to safeguard citizens who expose corruption. It has repeatedly called for electoral reforms to ensure transparency, accountability, and fairness in political finance and election management. For instance, through its research and advocacy, TIB has pressed for depoliticization of key state institutions (e.g. ACC, law enforcement) to reduce corruption and strengthen accountability. (Source: New Age 30 January 2024 & TIB Website)

Parliamentary and Policy Engagement:

TIB has worked very closely with parliamentary committees to promote accountability in legislative processes. Over the last five years, it has provided evidence-based recommendations on the national budget to enhance transparency in resource allocation and expenditure.

Promoting International Alignment:

TIB is widely recognized as one of the key organisations helping to link Bangladesh's anti-corruption agenda to global commitments such as the UN Convention against Corruption (UNCAC) and Sustainable Development Goals (SDGs), pressing the government to align reforms accordingly. TIB's second-cycle review of Bangladesh's UNCAC commitments revealed key insights in a press conference on 5 October 2023.⁷

⁷ See: Battling Corruption in Bangladesh: Insights from TIB's UNCAC Review.

EQ1.3 To what extent is the intervention responsive to the needs and expectations of local key stakeholders, including marginalised groups?

PACTA has demonstrated high responsiveness to volunteers-led monitoring and advocacy to identify governance deficiencies and promote transparency and accountability in the delivery of basic services, especially among marginalised and underserved populations. Key examples include community monitoring of local health centres to address misgovernance, the use of open school data and community monitoring to empower parents in primary schools, and advocating for improved laws and policies within the land administration sector.

In multiple locations, ACGs and CCCs successfully surfaced previously neglected issues and facilitated redress through formal and informal channels. For example, from the early design phase, the Civic Engagement Division built inclusivity into ACG and CCC formation, reporting that 40% of members are women and 15% come from ethnic or disadvantaged backgrounds, who are essentially regarded as the “rural poor” in Bangladesh⁸.

In Hāroa, Nilphamari (6 August 2025), the ACG initiated a dialogue on the landlessness of 40 Harijan families residing in Ashrayan housing but lacking ownership rights. This advocacy reframed the issue within the constitutional guarantees of equality⁹ and contributed to a new round of engagement with district authorities. The intervention reflects the project’s responsiveness to intersectional discrimination and the structural exclusion of Harijan communities from land entitlement processes¹⁰.

Gender-responsive action was observed in Shahabajpur High School, Rangpur, where an ACG-led meeting on 11 May 2023 identified the absence of female-friendly facilities. Within three months, a common room for female students was established (August 2023), demonstrating PACTA’s capacity to respond promptly to adolescent girls’ specific needs.

At Gorgram Union Sub-Health Centre in Nilphamari (18 May 2023), a woman denied access to health services due to staff absence was supported by ACG and YES group members to file a formal complaint. The Upazila Health and Family Planning Officer took immediate

⁸ CE Division meeting, 14 August 2025.

⁹ The Constitution of Bangladesh guarantees human rights and equality, particularly through Articles 27-44 on Fundamental Rights, which mandate equality before the law, protection against discrimination based on religion, race, caste, sex, or birth, and equal opportunities in public employment. Despite these legal safeguards, persistent challenges like gender-based harassment, wage gaps, and socioeconomic inequalities highlight a gap between constitutional ideals and lived realities.

¹⁰ For a comprehensive understanding on their social and economic status see: ‘Harijans of Bangladesh’ by Zillur Rahman and Sabrina Miti Gain, SEHD 2019, <https://brattyajan.org/wp-content/uploads/2022/08/Harijans-of-Bangladesh.pdf>

disciplinary action, indicating that the project's support mechanisms empower local actors, including women, to assert accountability.

The survey responses indicate broad agreement that local-level community members, including the very poor and marginalised groups, have benefited from the PACTA programme. Among the 1,222 respondents, 373 from ACG, 49 from CCC, and 90 from YES strongly agreed, while 450 ACG, 63 CCC, and 116 YES respondents agreed. Only 33 participants were undecided, and 12 expressed disagreements. Two YES respondents strongly disagreed.

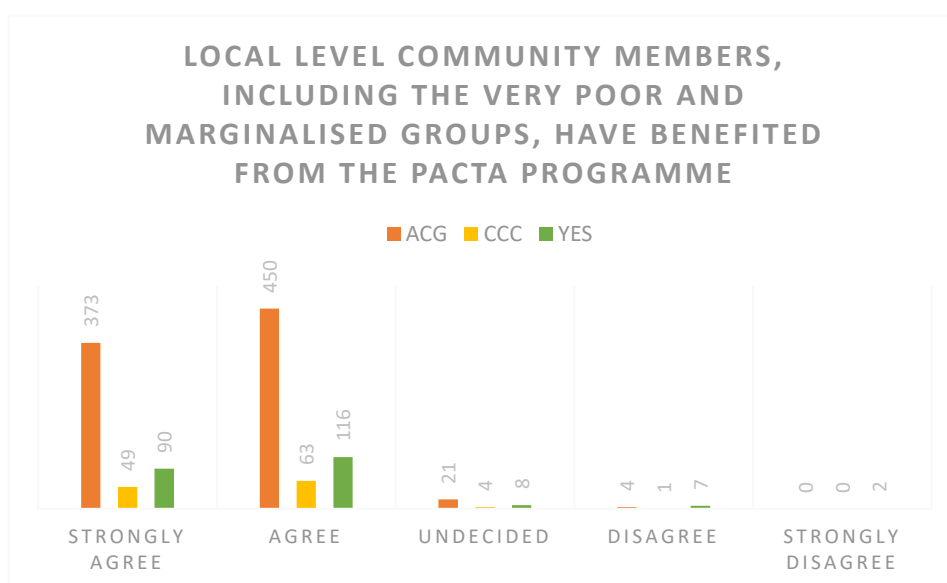


Figure 2 Community Views on the Inclusiveness and Reach of the PACTA Programme

These findings suggest that the programme's reach has extended meaningfully to vulnerable groups, with high levels of affirmation across all three constituencies. The results highlight the perceived inclusiveness and relevance of PACTA's interventions at the grassroots level.

EQ1.4 How relevant are PACTA's thematic areas, tools (e.g. PACTApp), and methods (e.g. citizen monitoring, advocacy) in addressing systemic corruption and promoting accountability?

PACTA's core thematic areas: anti-corruption, participatory governance, and rights-based service monitoring are highly relevant in Bangladesh's governance context. The tools and methods applied under the programme are well-suited to identifying and addressing systemic integrity gaps at the local level. For example, the overwhelming 93.1 percent positive response indicates that users perceive the PACTApp as a relevant and helpful tool for addressing corruption at the local level. This suggests strong user-level validation of the tool's relevance, especially within community contexts.

Thus, data from Q3: "The PACTApp has helped people address corruption issues at the local level" provided strong evidence of the PACTApp's relevance as a tool. The same feedback was received from the most of the interviewed informants in this evaluation.

The PACTApp, launched at Cumilla Medical College Hospital in 2023, enabled real-time tracking of complaints and service irregularities. It complemented other positive changes such as the removal of informal brokers, improved staff attitudes, and increased public awareness of entitlements. The introduction of clear codes of conduct, consequences for misconduct, and systems for reporting violations influenced these individuals to engage in more ethical behaviours and avoid unethical ones. These changes directly contribute to the National Integrity Strategy’s healthcare-specific goals and demonstrate how digital feedback systems can disrupt informal fee-taking and enhance transparency.

Community Action Meetings and Public Hearings, as applied in Darshana Union under Rangpur district (6 June 2024) and Kalirbazar in Cumilla district (26 September 2024), have proven to be low-cost but high-impact methods for ensuring dialogue between service users and providers. These forums provided immediate feedback loops and enabled the deployment of medical officers, provision of equipment, and restoration of service schedules—demonstrating how participatory mechanisms can address structural service failures.

In the education sector, tools such as complaint boxes, parent-teacher dialogues, and school management committee activation have improved local oversight and created replicable governance models, particularly in Ramkrishnobar (2024–2025) and Edilpur under Madhupur sub-district (follow-up confirmed July 2025).

Across all sites, PACTA’s structured, iterative approach to citizen monitoring and evidence-based advocacy has proven relevant to national efforts to institutionalise transparency, reduce corruption, and promote social accountability in frontline service delivery. PACTA’s tools and thematic focus are not only relevant but also complementary to formal state accountability structures. Its focus on health, education, land, and environment aligns with the sectors most affected by citizen-reported corruption, as evidenced by TIB’s own National Household Survey on Corruption.

Respondents across all sampled groups strongly affirmed that the experience from the PACTA programme is important for reducing corruption and increasing accountability across Bangladesh. Out of 1,200 respondents, 462 ACG, 69 CCC, and 124 YES members strongly agreed with the statement, while an additional 383 ACG, 49 CCC, and 97 YES respondents agreed. Only 12 participants were undecided, and a total of 6 expressed disagreement, including 2 who strongly disagreed.

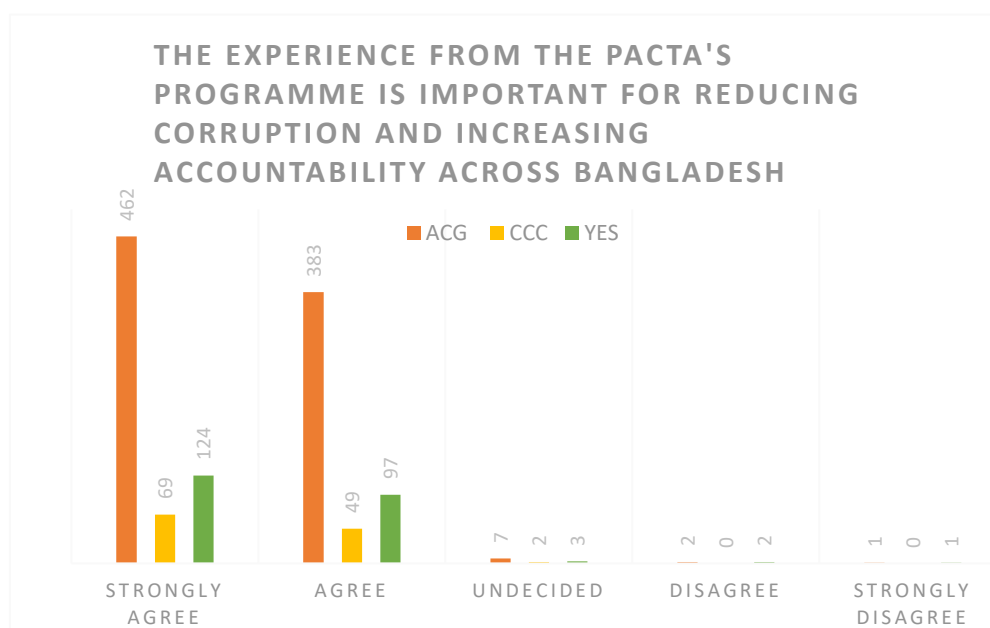


Figure 3. Stakeholder Views on the Broader Importance of PACTA Experience for Bangladesh

The high levels of agreement: over 95 percent across all groups, highlight the perceived relevance and broader value of the PACTA programme beyond its immediate local interventions. These findings suggest strong stakeholder support for scaling or adapting PACTA's approaches in other regions of the country.

Advocacy & Other Tools: During the period under review, TIB produced policy briefs, working papers, and comparative analyses to influence legislative and regulatory processes. It engaged stakeholders including parliamentary committees, relevant ministries, and public stakeholders in debates. For example, TIB's influence became evident when the government began re-evaluating the Cyber Protection Rules in response to TIB's observations (Source: TIB Website). In education sector, a circular for recruitment of entry-level teachers in private institutions was issued in January 2024 by the Education Division, aligning with TIB research study recommendations. In terms of wider advocacy for good governance, TIB raised concerns about civil liberties, freedom of expression, media freedom, particularly vis-à-vis restrictive or draconian laws introduced by the erstwhile Awami League Government. It also highlighted corruption in service sectors, via its national household surveys, showing bribery incidence across many public services.

3.2 EFFECTIVENESS

EQ2. To what extent has PACTA achieved or is likely to achieve its intended results and contributed to changes in anti-corruption practices and citizen empowerment?

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Social Movement and Civic Engagement: According to the vast majority of the volunteers consulted by the evaluation team PACTA has **contributed to a measurable shift in anti-corruption** behaviour and civic empowerment **across its three core sectors** such as Education, Health, and Land, and increasingly in the Environment. **Tangible results include reduction of absenteeism among public officials, increased access to information, improved grievance redress systems, and concrete service delivery improvements.**

PACTA has helped generate administrative responses in these mentioned public sectors, and land, while also embedding participatory monitoring structures that enhance citizen voice and responsiveness. The platform's digital complaint mechanism (PACTApp) and offline engagement tools have been used to escalate over **23,000 grievances**, with TIB data as of mid-2025 indicating **20,251 (87.6 percent) have been resolved**. This outcome, triangulated with CCC, ACG, and YES group observations, illustrates a consistent link between community voice and duty-bearer action.

Survey respondents overwhelmingly affirmed that the PACTApp has helped people address corruption issues at the local level. Of the 1,179 respondents, 378 from ACG, 48 from CCC, and 84 from YES strongly agreed, while 439 ACG, 63 CCC, and 125 YES respondents agreed. A small number remained undecided (34 in total), and only 11 respondents disagreed, including one who strongly disagreed.

The consistently high levels of agreement across all three groups underscore the perceived practical utility of the PACTApp as a tool for citizen engagement and local-level accountability. The data suggests that the digital platform has effectively supported community members in identifying and addressing corruption-related concerns in their immediate environments.

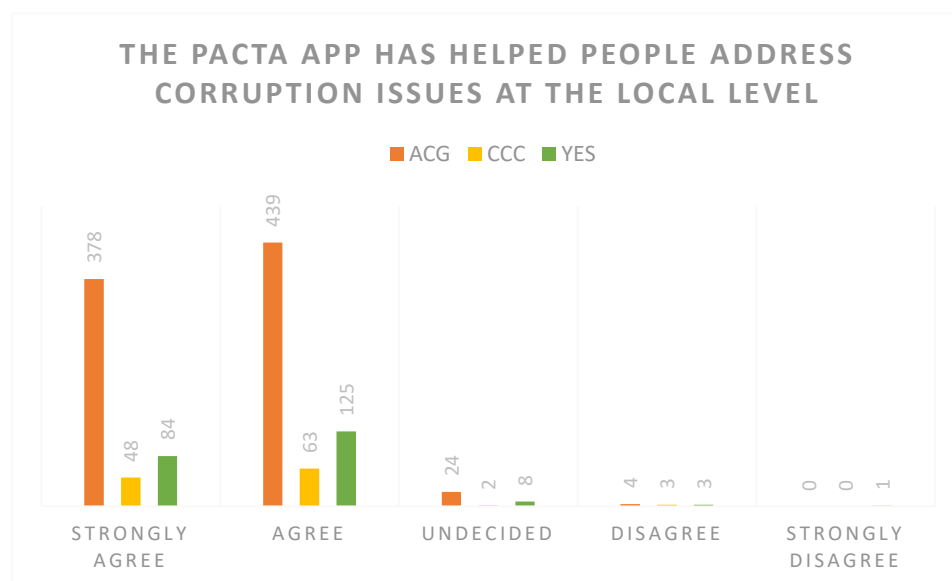


Figure 4. Perceived Effectiveness of the PACTApp in Addressing Local Corruption Issues.

EQ2.1 What observable results have been achieved at the institutional, service delivery, and community levels, and what factors have enabled or constrained these results?

At the institutional level, Upazila Secondary Education Officer in Madhupur issued a circular in November 2024 directing 36 schools in the area to establish complaint boxes, notice boards, and functional School Management Committees. Implementation was confirmed in multiple schools by July 2025.

At the service delivery level, the Darshana Union Sub Health Centre under Rangpur district adopted key changes following a community action meeting on 6 June 2024, including the placement of a complaint box, procurement of medical equipment (e.g., BP machine), and the deployment of a medical officer, confirmed in January 2025. At Cumilla Medical College Hospital, after CCC and ACG engagement throughout 2023, informal brokers were removed, hidden payment practices declined, and patient-facing information desks and a complaints register were established by March 2025. It is important to note that in Bangladesh, informal brokers in hospital services, known as “dalals”, act as morally ambiguous intermediaries, connecting patients from public facilities to private hospitals, often bypassing formal channels. They emerge due to systemic barriers in formal care, such as long wait times, overcrowding, and corruption. While technically prohibited, these brokers are a fixture in the health landscape, especially in maternal healthcare, and their prevalence highlights the complex interplay between formal and informal healthcare markets.

In Land administration area, the Assistant Commissioner of Madhupur issued a formal directive on 9 February 2025 following CCC advocacy on 28 November 2024, instructing five union land offices to enforce eight transparency standards, including citizen charters, digital records, and complaint mechanisms. A follow-up Land Fair was organised by the Deputy Commissioner's Office in Khulna from 25 to 27 May 2025 to showcase how the government is trying to digitize land administration in the district as well as across the whole country to “ensure transparency, accountability and faster public service delivery”¹¹.

At the community level, parental trust and enrolment increased at Ramkrishnobar Government Primary School in Madhupur sub-district following CCC engagement with the Upazila Education Officer throughout 2024, with student numbers reaching 130 by early 2025 (as opposed to 40 students throughout 2024) and regular school meetings reinstated. In Shahabajpur High School under Rangpur district, after an ACG-led initiative on 11 May 2023, a common room for girls was established within three months, addressing gender-based barriers to attendance. In Nilphamari, on 6 August 2025, an ACG formally advocated for land rights for 40 Harijan families previously excluded from government schemes.

Enabling factors include structured ACG/CCC monitoring, institutional openness to dialogue, and PACTApp’s two-way feedback mechanism. Constraints included uneven smartphone

¹¹ <https://www.bssnews.net/district/276566>

access, which required ACGs to nominate 4 device-equipped members; the six-month funding delays by the NGO Affairs Bureau, which approves, regulates fund disbursement and coordinates NGOs that receive foreign funding, delaying programme implementation by six months; the real prospect of project downsizing beyond December 2026; and limited policy traction in law enforcement institutions.

Advocacy, Policy Reviews & Research for Wider Reforms:

In Bangladesh, freedom of expression has long been under attack, especially during Sheikh Hasina’s authoritarian regime that introduced the Digital Security Act and Cyber Security Act to systematically silence journalists, activists, and dissenting voices, creating fear and self-censorship. TIB extensively reviewed such laws and policies, identifying problematic provisions and suggesting reforms to the government. The key ones include:

Digital Security Act (DSA): Implemented as a tool of repression, it mainly targeted media and activists. TIB reviewed the law, labeling it a “weapon of oppression,” and provided expert analysis that fueled public discourse on digital rights.

Draft Cyber Security Act (CSA) 2023: comparing it with the Digital Security Act 2018 and urging removal of restrictive provisions that risk suppressing free speech. TIB’s comparative analysis revealed that it blurred lines between cybercrime prevention and censorship, still threatening free speech, enabling police overreach, and lacking technical sophistication. TIB described it as “repackaging repression.”

Data Protection Act: submitted a 41-point recommendation on the draft document pushing for clear definitions, judicial oversight, an independent supervisory body, and ensuring the law protects citizens rather than enabling surveillance.

Public Audit Bill 2023: offered comments particularly in relation to preserving powers of the Office of the Comptroller and Auditor General (OCAG).

TIB also raised concerns about the draft Data Protection Bill for being restrictive or vague. After the regime’s fall in August 2024, TIB’s advocacy led to the repeal of the CSA. However, a new *Cyber Protection Ordinance (2025)* was introduced that mirrored much of the old flaws. Through sustained evidence-based advocacy, TIB engaged with the interim government and secured major reforms in the final law, including removing controversial provisions and limiting unnecessary arrests.

As part of its “Open data-driven advocacy”, TIB launched the *Know Your Candidate (KYC)* initiative in December 2023, analyzing over 6,000 candidate affidavits from four national elections. The data showed sharp increases in politicians’ wealth, highlighting a trend of prioritizing personal financial gain as opposed to public service. This open-data analysis uncovered undeclared overseas companies and UK property investments worth BDT 2,312 crore by then-Land Minister Saifuzzaman Chowdhury, who did not disclose his assets in his 12th election affidavit. He was subsequently ousted from the new cabinet. The KYC research not only highlights a significant increase in the wealth of politicians in Bangladesh, but also

shows how open data can expose corruption and trigger both domestic and international accountability measures.

TIB's national household surveys (e.g. "Corruption in Service Sectors: National Household Survey 2023") quantified bribe payments and corrupt practices in key services (passports, land services, judicial services, education, health, etc.), providing evidence to build public pressure and push for reforms. (Source: Bartakonho, 4 December 2024). Between 2022 and 2025, TIB undertook various other research initiatives covering climate finance and environmental governance, election integrity and political finance, local government transparency, COVID-19 response and accountability (2022 focus) and digital governance and public procurement.

As part of TIB's broader mission for governance reform, these efforts played a pivotal role in exposing corruption at the highest level and resisting and reshaping repressive laws in the country. As recognized by TIB itself, while many reforms have been initiated, there are persistent challenges in terms of the following:

- Influence of political or bureaucratic interests on accountability institutions (e.g. ACC, judicial bodies) remains strong¹².
- Many reforms are still in draft form or awaiting implementation¹³.
- Service delivery corruption (bribes etc.) remains widespread despite awareness and measurement. (Source: Bartakonho, 4 December 2024).
- Public perception of corruption remains poor, as seen in Bangladesh's worsening ranking on the Corruption Perceptions Index¹⁴.

EQ2.2 How effective are PACTA's strategies for engaging citizens, media, civil society, and public institutions in accountability efforts, including digital tools like PACTApp?

PACTA has demonstrated a high degree of effectiveness in engaging a broad range of actors—citizens, journalists, civil society organisations, and public institutions—through participatory structures and integrated accountability tools. The one-to-one interviews with government officials, the FGDs with the national media representatives, volunteers and civil society groups indicate PACTA's genuine contribution to strengthen democratic process and social responsibility aspect of the press, including exposing corruption in local and national levels, irregularities and unlawful activities and corruption in service providing sectors.

Its core strategies, including the formation of CCC, YES, and ACG, have enabled continuous citizen oversight and collective action in sectors vulnerable to corruption. The model is further

¹² Source: New Age, 30 January 2024 & TIB Website.

¹³ Source: TIB Website, Press Release 4 August 2025.

¹⁴ Source: bdnews24.com, 11 Feb 2025 & TIB Website.

reinforced by PACTA's digital platform, PACTApp, which serves as a central mechanism for complaint registration, issue tracking, and redress monitoring.

Collaboration between the Committees of Concerned Citizens (CCC), Youth Engagement & Support (YES) Groups, Active Citizens' Groups (ACG), and the media is widely perceived to have increased public awareness of corruption within communities. Survey findings show a strong consensus across all groups, with 642 respondents strongly agreeing and 524 agreeing out of a total of 1,176. Only seven were undecided and three expressed disagreements. Levels of agreement were consistently high across all groups, with 99 percent of ACG and CCC members and 98 percent of YES respondents affirming the value of these collaborative efforts. These results indicate that the programme's multi-stakeholder and community-based approach has been effective in enhancing local understanding and engagement on anti-corruption issues.

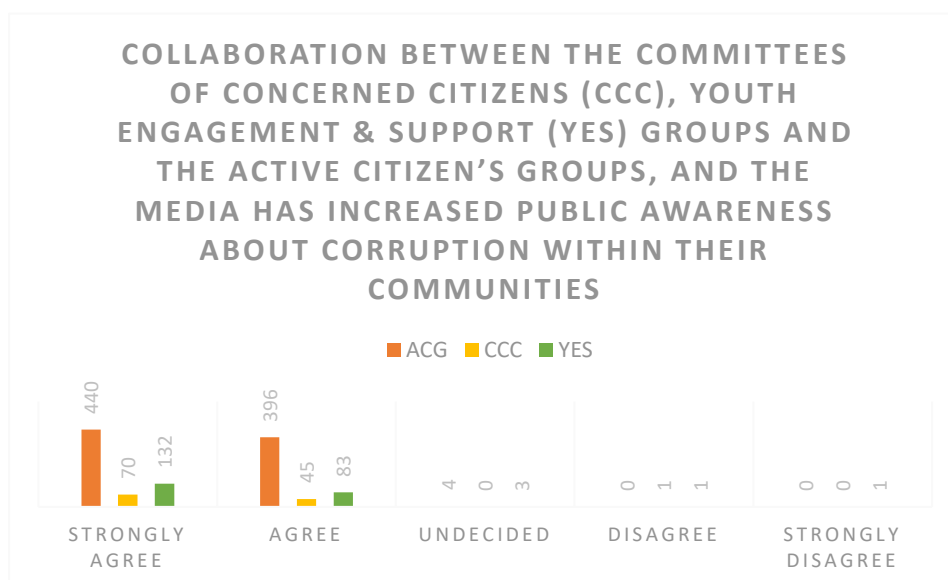


Figure 5 Perceived Impact of Community and Media Collaboration on Public Awareness of Corruption

In practice, **PACTApp is being widely adopted at the community level** in the 45 areas across the country where the programme is currently operational. This is evident from the type and volume of data being sent by the ACGs to the CCCs on a monthly basis. Such data typically reflects reports and follow-up actions on irregularities in the health, education, and land sectors. In Cumilla, Rangpur, and Madhupur, CCC and YES members reported that the app increased the visibility of grievances and generated a sense of urgency among service providers. According to CCC members in Cumilla¹⁵, the digital system not only allowed them to track resolution timelines but also served as an advocacy tool during meetings with institutional stakeholders. However, several users also highlighted usability constraints, including the limited categorisation of complaint types and the absence of an “Other” option, which restricts the scope of issue reporting in complex or overlapping service failures.

¹⁵ FGD 1, 18 August 2025

Beyond digital engagement, **PACTA’s strategies have enabled robust collaboration with the media, which has played a catalytic role in amplifying public accountability.** During the Focus Group Discussion with national journalists on 24 August 2025, media representatives credited PACTA for enhancing both the quality and legitimacy of their reporting on corruption and service failures. Journalists emphasised that access to citizen-generated data, structured complaint records, and institutional responses, often collected through PACTApp or public hearing, enabled them to report with increased factual accuracy and reduced risk. One journalist noted that “PACTA gave us facts and documents. We don’t have to depend on unverified claims anymore,” highlighting the strategic value of structured community reporting in contexts where political sensitivities can deter media coverage.

PACTA events, particularly public hearings and information fairs, have created multi-actor accountability spaces where service providers, citizens, civil society, and the press interact directly. Journalists observed that these forums allowed them to access both institutional perspectives and community grievances in the same setting, enhancing transparency and mutual trust. The active role of youth groups, women representatives, and marginalised voices in these engagements also reflected the project's inclusive design, further strengthening the narrative legitimacy of media outputs. For instance, the YES groups have played a catalytic role in mobilizing people against corruption by instilling ethical values, raising youth awareness, training young leaders, and spearheading community-level anti-corruption activities like information fairs and public monitoring. These groups have empowered young people to become agents of change, using creative methods and volunteerism to foster a future generation committed to honesty, integrity, and good governance - thus expanding the movement for a corruption-free Bangladesh.

The journalists noted that public institutions were **more willing to engage with the media** when civil society actors were already in dialogue with them, creating a safer environment for investigative reporting. On their own, they are much more likely to face physical threats and intimidation for exposing unethical practices of powerful entities. PACTA events and information fairs were particularly helpful in bringing officials, community members, and reporters into the same space, thereby fostering mutual accountability.

Despite these achievements, journalists also flagged limitations in media reach and the potential vulnerability of youth and women accountability actors when confronting politically powerful figures. Their feedback was specifically focused on the need for extending PACTA’s digital grievance tools to include offline modalities and more flexible reporting formats so as to accommodate the diversity of public service failures, which entails more financial investments.

“When I publish a report now, I can say it was discussed in the public hearing or flagged in the PACTApp. That makes it more legitimate.”

Overall, PACTA’s engagement strategies have been effective in operationalising participatory accountability across multiple layers of governance. The integration of digital tools with grassroots oversight structures, combined with

deliberate outreach to media and public institutions, has created an enabling environment for transparent dialogue and evidence-informed action. The media’s testimonial confirms that **PACTA has not only informed public debate but also reshaped the way corruption and service delivery failures are reported, making it a relevant and credible actor in Bangladesh’s accountability landscape.**

EQ2.3 In what ways has PACTA’s collaboration with state institutions (e.g. ACC, Information Commission) influenced policy or practice?

PACTA’s collaboration with state institutions has primarily focused on collaborating on “forensic approaches” for the banking sector that combine advanced technology, forensic accounting, and strong internal controls to detect and prevent fraud, money laundering, and bribery. Key methods include digital forensics, data analytics to find anomalies, risk-oriented auditing, whistleblower management, and the integration of anti-corruption programmes within a risk management framework.

These efforts are contributing to institutional learning and joint prevention. Under the MoU, TIB delivered Know Your Candidate (KYC) training to ACC investigators in December 2023. During a 14 August 2025 meeting, the ACC was described TIB as “the only alternative” to monitor corruption and expressed willingness to institutionalise joint approaches.

TIB regularly shares PACTA findings with the ACC, which has used these in internal prevention efforts. However, structural limits within ACC, including staffing constraints and limited prosecutorial authority, remain a barrier to scaling these results.

In Nilphamari, the administration noted in August 2025 that “we need a watchdog as TIB, to fight against corruption. Their activity is most appreciated,” acknowledging the role of PACTA in raising awareness and linking citizens to government accountability processes. In Madhupur, the land administration reported that TIB’s initiatives, such as information fairs, enabled citizens to raise settlement-related concerns and confirmed that “people got a good awareness about questioning the AC Land and they know that we are ready to face their questions.”

In education, the local authority confirmed that school management committees had improved oversight and that irregularities were now addressed more promptly because schools were “aware of TIB.”

While PACTA has not yet translated into systemic reforms in national institutions such as the ACC or Information Commission, its collaboration has clearly influenced practice by making local institutions more transparent and responsive to citizen concerns.

EQ2.4 To what extent has PACTA implemented its Gender Equality and Social Inclusion strategy, and how has it influenced the participation, empowerment, or protection of women and disadvantaged groups?

EQ2.5 To what extent has PACTA applied human rights-based principles (e.g. participation, non-discrimination, transparency, accountability) in its design and implementation?

PACTA has effectively implemented its GESI strategy, ensuring the participation and empowerment of women and marginalised groups. CCC and ACG membership is composed of approximately 40 percent women and 15 percent members from disadvantaged backgrounds. These commitments have resulted in concrete outcomes. The Board of Trustees overseeing the PACTA intervention has a member who is visually impaired. PACTA's work empowered women and marginalised communities not just to raise their voices but to hold service providers accountable and challenge corrupt practices that directly affect their lives. The following examples show how community action exposed neglect, exclusion, and informal payments, leading to changes that promoted fairness and transparency.

The survey findings across the three respondent groups ACG, CCC, and YES show a strong and consistent perception that the PACTA programme has meaningfully promoted the participation of women and disadvantaged groups in anti-corruption efforts. Out of 1222 total responses, 507 respondents (48 percent) strongly agreed and 534 (50 percent) agreed that PACTA encouraged inclusive participation. Only 17 respondents were undecided and 6 expressed disagreements, with no respondents strongly disagreeing. This pattern is remarkably consistent across all groups, including youth and community-based actors, suggesting that PACTA's efforts to mainstream inclusion were both visible and credible across diverse constituencies.

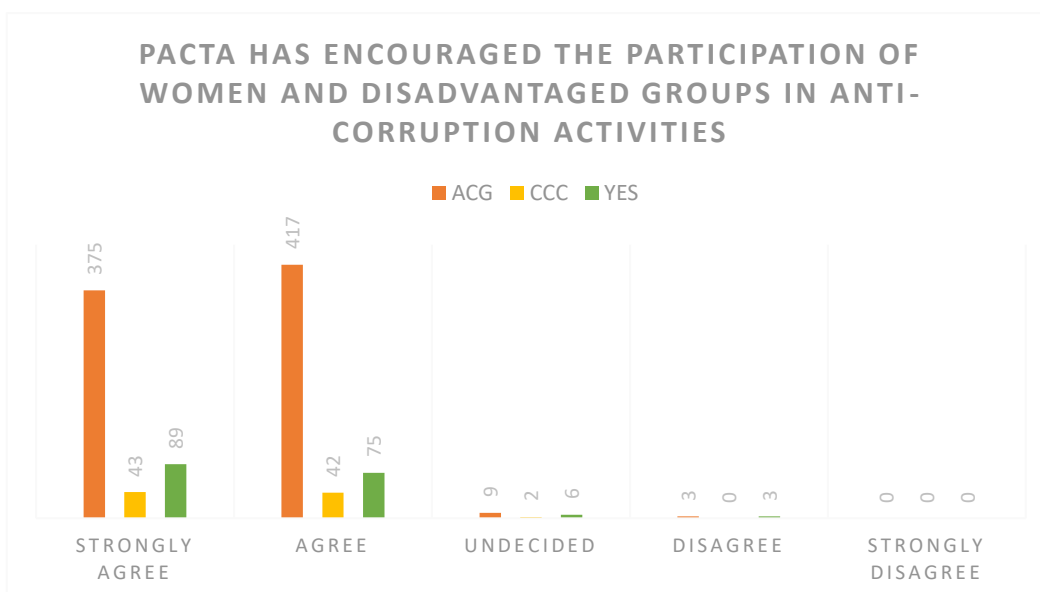


Figure 6 Perceptions of Inclusive Participation under PACTA across the stakeholders.

The data indicates that gender and social inclusion were not treated as peripheral or symbolic but rather embedded in the programme's outreach and implementation modalities. The high level of agreement implies that respondents recognised concrete opportunities created by PACTA for women and marginalised groups to engage in anti-corruption actions — whether through awareness raising, community monitoring, local dialogues, or digital participation platforms. This reflects positively on the programme's responsiveness to inclusion commitments and its ability to operationalise them at grassroots level.

PACTA has applied HRBA principles systematically. Participation is ensured through monthly ACG meetings, public hearings (e.g., Kalirbazar, 26 September 2024), and structured complaint mechanisms. Non-discrimination is evident in interventions supporting Harijan communities and gender-responsive school environments as provided in the specific examples above. Transparency and accountability are embedded via citizen charters, functional notice boards, digital land portals, and open feedback mechanisms via PACTApp.

Participation is ensured through CCC, ACG, and YES groups that convene monthly meetings and organise public hearings. For example, during a public hearing in Kalirbazar in Cumilla on 26 September 2024, citizens raised grievances on absenteeism and unofficial fees directly to health officials, prompting immediate commitments. Transparency measures such as citizen charters, published staff lists, and complaint boxes have been systematically introduced.

The Kuragacha Union Family Welfare Centre in Madhupur, confirmed that “previously we hadn’t any objection box in this complex, but TIB made sure to add one. Also, the list of the names who are currently working on this complex are now published publicly.” Accountability is reinforced through complaint mechanisms such as PACTApp, which communities now use to track resolutions.

Non-discrimination has been prioritised by ensuring women’s representation and by extending services to vulnerable groups. In Nilphamari, CCC members reported ensuring breastfeeding corners and women’s toilets in health centres, while in Rangpur ACG members noted that “the health centre is near to our reach. So, a woman or girl doesn’t have to suffer,” reflecting improved access for women. These examples demonstrate that HRBA principles are not only embedded in project design but also actively shaping service delivery outcomes.

EQ2.6 How effective have PACTA’s research, advocacy, and communication strategies been in influencing public debate or institutional reform?

PACTA’s integrated strategy of research, advocacy, and communication implemented through Transparency International Bangladesh (TIB), has demonstrated tangible influence on institutional practices, policy reform, and public discourse between 2022 and 2025. The programme generated a substantial body of diagnostic studies, corruption surveys, and policy briefs that served as credible evidence for reform dialogue and national accountability efforts

Policy and Institutional Outcomes

Between 2022 and 2025, TIB research under PACTA informed over **eight national policy changes** and at least **fifteen shifts in institutional practices and processes**, spanning sectors including procurement, environment, health, land, NGO regulation, education, and mobile financial services¹⁶. The 2023–2025 policy studies on public procurement revealed extreme market concentration, leading the Interim Government to amend procurement rules to mandate

¹⁶ TIB, Research Outcome 2025 Up to June 2025 (June 2025) 2–4.

disclosure of beneficial ownership, expand mandatory e-GP use, and initiate legal changes to curb collusion.

The flagship platform “New Bangladesh”: Corruption, Democracy and Good Governance” proposed 55 actionable reforms across nine thematic areas. Several of these were incorporated into draft laws, including the mandatory annual asset declaration for public officials and their families, and amendments to the Cyber Protection and Public Audit Ordinances. TIB’s Executive Director’s appointment as Chair of the ACC Reformation Commission further institutionalised its role. The Commission produced a 47-point reform package, gaining cross-party consensus on most recommendations and signalling high-level political traction for structural anti-corruption reforms.

Transnational Impact and Global Recognition

Beyond Bangladesh, PACTA-supported research influenced international governance agendas. In 2024, Transparency International Bangladesh (TIB), under the PACTA programme, published a landmark study titled “Accessing Green Climate Fund (GCF) for Vulnerable Countries like Bangladesh: Governance Challenges and Way Forward.”¹⁷ The study identified key barriers to effective GCF access, including weaknesses in fiduciary oversight, accreditation delays, and lack of transparency in fund allocation. Based on the study’s findings, TIB formally engaged with the GCF Secretariat, which publicly acknowledged the recommendations. The Secretariat subsequently committed to strengthening transparency, reforming accreditation procedures, and enhancing country ownership in line with the study’s suggestions. The study “Accessing Green Climate Fund (GCF) for Vulnerable Countries like Bangladesh: Governance Challenges and Way Forward” led to direct engagement with the GCF Secretariat, which formally acknowledged the study’s recommendations¹⁸. TIB reports that the GCF Board has committed to reforms in accreditation processes, monitoring and accountability standards, and legal frameworks to strengthen transparency and country ownership, as evident in the suite of decisions under B.42.

Public Discourse and Civic Resonance

PACTA’s communication and civic engagement strategies amplified the reach and legitimacy of its research outputs. The 2023 National Household Survey on Corruption and the Know Your Citizen (KYC) platform informed national debate, with journalists citing TIB’s data as a basis for investigative coverage. At the local level, citizen-backed accountability dialogues—such as in Madhupur—resulted in formal commitments by land authorities to publish service standards. Digital outreach under PACTA was extensive: TIB’s 2024–2025

¹⁷ Transparency International Bangladesh, *Impact Story: PACTApp Based Data Driven Policy Advocacy* (2025), available at: <https://www.ti-bangladesh.org/articles/story/6985> (accessed 17 October 2025).

¹⁸ Transparency International Bangladesh, ‘Green Climate Fund (GCF) biased and unfair towards developing countries like Bangladesh’ (14 May 2024) <https://www.ti-bangladesh.org/articles/story/6985> accessed 17 October 2025

reform proposals reached 11.1 million users online, while broader social-media engagement exceeded 3 million interactions. Youth-focused campaigns, notably the Anti-Corruption Cartoon Competition, evolved into a symbolic form of civic resistance during periods of restricted expression

Challenges Affecting Sustainability and Scale

Despite these achievements, PACTA's broader influence has been constrained by both external and internal factors. Externally, Bangladesh's continued low ranking on the Corruption Perceptions Index (CPI) illustrates the persistent systemic barriers to reform.

Internally, staff shortages within TIB's Research and Policy Division, funding delays, and the absence of a dedicated MEL function limited systematic evidence tracking and follow-up on reform uptake. These constraints reduced the programme's capacity to sustain advocacy momentum and to measure cumulative institutional impact.

PACTA's evidence-based advocacy has produced verifiable results at this mid-term, shaping national laws, strengthening institutional accountability mechanisms, and fostering civic mobilisation. Its combination of empirical research, credible policy engagement, and wide-scale communication positioned TIB as a key catalyst for anti-corruption and governance reform in Bangladesh, with influence extending into global policy debates. The final evaluation is best placed to harvest the impact-level results of these achievements.

Despite these achievements, **several internal challenges constrained the broader impact of PACTA's research and communication strategies.** Staff shortages within the Research and Policy Division limited the programme's capacity to produce high-quality and timely outputs. Delays in the disbursement of funds further disrupted planned activities, particularly those requiring external coordination and communication campaigns. Additionally, the absence of a dedicated Monitoring, Evaluation, and Learning (MEL) function within PACTA hindered systematic follow-up on evidence uptake and restricted the ability to document learning or measure policy influence effectively.

3.3 EFFICIENCY

EQ3 To what extent have PACTA's management and monitoring systems supported timely, cost-effective, and adaptive implementation?

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Despite a highly constrained financial and political context, PACTA demonstrated commendable levels of institutional resilience and adaptive efficiency. The programme experienced a severe funding shortfall during 2023–2024, which required swift adjustments to operations, staffing, and spending priorities. Following the withdrawal of USAID funding effective January 2025 and a reduced funding commitment from FCDO, PACTA is experiencing a funding shortfall of approximately 35% (USD 11.04 million) against its original

commitment of USD 31.4 million. USAID has withdrawn USD 6.43 million, representing 64% of its pledged contribution. Also, FCDO has reduced its commitment by GBP 4.475 million (equivalent to USD 6.04 million) upto March 2026, representing 60% of its original pledge. FCDO's next commitment yet to confirm. On a positive note, Sida has provided an additional USD 1 million grant, and PACTA has also secured USD 425,000 in funding from OSF.

To mitigate the funding gap, PACTA has developed an interim plan that includes borrowing from the staff provident and gratuity funds, freezing new recruitment, and reducing the total team from 178 to 93 staff members. Expenditures in innovation, ICT development, and outreach programming were scaled back. Activities that could not be maintained under existing cost ceilings were deferred or cancelled altogether, including several research and public awareness initiatives¹⁹.

As of early 2025, the programme had spent roughly 65 percent of this allocation. The largest expenditure categories were personnel costs, operational support for sub-national partners, and communication activities. Notably, investments in digital platforms such as PACTApp and HRMS reached BDT 3.9 million (USD 36,500) in 2025 alone²⁰. However, there was no dedicated budget line specifically for Monitoring, Evaluation, and Learning (MEL), limiting the programme's capacity to adapt strategically or generate robust performance data.

EQ3.1 How effective and efficient is the management and coordination structure, including the roles of the supervisory and steering mechanisms?

PACTA's management structure relied heavily on Dhaka-based coordination by TIB, supported by regional teams and local civil society actors. While this model ensured strategic oversight and compliance with donor frameworks, it created bottlenecks in decision-making. Key informant interviews confirmed that routine operational matters required multiple sign-offs from headquarters, delaying local implementation and raising concerns about cost-effectiveness. It was noted in consultations that the project remained "administratively heavy," and adoption of a more decentralised and agile operational model was expected but not materialised. The same group of informants indicated that the role of project Steering Committee remained formal and episodic, with limited influence over day-to-day adaptive management. The steering mechanisms functioned with limited disruption, and senior leadership absorbed some coordination responsibilities to mitigate staffing gaps. However, interviews conducted in 2025 highlighted instances where communication between implementation levels was delayed due to over-centralised decision-making during the crisis period.

¹⁹ Transparency International Bangladesh, PACTA Funding Scenario (2022–2026) (internal document, 2025)

²⁰ PACTApp Maintenance and Hosting Cost for 2025

EQ3.2 How well does the programme's results framework, performance indicators, and baseline data support monitoring and accountability?

The PACTA programme is guided by a detailed results framework comprising three outcomes and seven outputs, as outlined in the Monitoring, Evaluation, and Learning (MEL) Plan. Each output is paired with defined performance indicators, aiming to measure both quantitative and qualitative progress. In total, **the framework includes 23 indicators, with 18 at the output level and 5 at the outcome level**, spanning across activities, citizen engagement, policy responsiveness, and institutional accountability²¹.

However, the evaluation found that the majority of indicators remain focused on counting activities and immediate outputs rather than capturing transformative outcomes. **Indicators such as the number of YES group meetings, ACG engagements with service providers, and PACTApp submissions are valuable for tracking implementation but are insufficient for assessing the actual impact on corruption practices or institutional responsiveness**²².

Furthermore, while the 2022 National Household Survey on Corruption is used as a reference for citizen perceptions and serves as a proxy baseline for some areas, the MEL Plan acknowledges that it does not serve as a full baseline across results areas. Most outcome-level indicators still lack corresponding baselines, benchmarks, or clear strategies for measurement²³.

The MEL Plan also highlights the potential role of PACTApp data in informing the results framework. Although citizen reports submitted via the app are used to generate sector briefs and inform advocacy work, these data are not systematically linked to the indicator tracking framework. This limits the programme's ability to triangulate feedback from communities with institutional performance and decision-making²⁴.

For instance, the PACTApp generates rich problem-specific data that documents recurring and location-specific issues such as absenteeism of teachers, infrastructure decay in schools, and illegal payments for school-related documents in the education sector²⁵. In the health sector, PACTApp data has captured patterns such as referral of patients to private clinics by public doctors, unavailability of free medicines, poor diagnostic services, and harassment by hospital brokers²⁶. However, the programme's results framework fails to incorporate this level of specificity. It does not disaggregate or reflect these granular, citizen-reported problems in its outcome or output indicators. As a result, while CCCs and ACGs are acting on real and

²¹ PACTA Monitoring, Evaluation and Learning (MEL) Plan (Updated 04 June 2025)

²² Ibid at p.6-8

²³ Ibid p.9

²⁴ Ibid 27–28 (Annex C: Use of PACTApp Data).

²⁵ Problem lists for education and health themes (evaluation documents, 2025), TIB.

²⁶ Ibid.

verifiable complaints, the central performance monitoring system does not track whether such problems are being resolved, repeated, or escalated.

Another example, in Ramkrisnobarī Government Primary School in Madhupur, local complaints captured through the CCC mechanism revealed infrastructure deficiencies, teacher absenteeism, and lack of minimum conditions for quality learning. Yet, no indicator in the programme's results framework explicitly tracks service quality improvements in schools or reduction in such complaints over time. Similarly, in the Cumilla Medical College Hospital, citizen reports led to direct institutional responses such as the posting of an anaesthesiologist and increased supervision. However, the results framework does not include any mechanism for capturing such improvements as measurable institutional outcomes.

This disconnect between granular citizen feedback and the programme's high-level monitoring indicators creates a missed opportunity to use community-generated evidence for real-time accountability and learning. It limits the potential of the MEL system to serve as a feedback loop between community-level experience and programme-level decision-making.

Internal reporting mechanisms are in place, including monthly and quarterly submissions from CCCs and project units. However, the reporting system remains largely manual, relying on Word and Excel templates rather than integrated dashboards. The absence of real-time analytics or disaggregated data (e.g. by gender, region, or service sector) has weakened the ability of the MEL system to inform adaptive management or strategic learning²⁷.

Although a basic performance tracking tool was introduced in 2024, and data aggregation responsibilities were distributed across the MEL team, there is still no centralised digital monitoring system that supports real-time accountability, especially in terms of how ACG actions influence service-level reforms²⁸.

In summary, while the results framework provides a necessary foundation, its current configuration is overly output-driven, inadequately linked to outcome-level progress, and not yet underpinned by a fully operational MEL system capable of informing strategic decisions or high-quality reporting.

The programme's results framework captured high-level outcomes and included sector-specific output indicators, particularly in education, health, and land administration. However, baseline data were not consistently collected across sites or sectors, and gender or geographic disaggregation was missing in several outcome areas. Interviews with sectoral stakeholders, including the Upazila Education Officer in Cumilla and the Head of the Upazila Health Complex in Madhupur, revealed that while some performance data were collected locally, they were not systematically integrated into programme-level learning. The revision of progress

²⁷ Ibid p.11-12

²⁸ Ibid p12-13

reports provide that the accountability reporting remained focused on activity completion, rather than on tracking change or outcomes.

EQ3.3 How has the Monitoring, Evaluation, and Learning (MEL) system contributed to adaptive management, strategic learning, and decision-making?

The Monitoring, Evaluation, and Learning (MEL) system under PACTA has made foundational progress since its establishment in 2022, but its contribution to adaptive management and strategic decision-making remains constrained due to institutional, structural, and financial limitations. The MEL Division operates across three main functions—planning, system development, and results analysis. It developed and manages a computer-based Monitoring Information System (MIS), which aggregates data from PACTA’s activities and helps track budget adherence, performance, and results.

The system provides visualisations and periodic reports intended to inform management-level decision-making. However, in practice, its impact on high-level adaptation and strategic shifts has been limited, partly because MEL staff are not formally included in management structures or decision-making fora. The limited inclusion of the MEL team in management-level discussions and key meetings significantly hinders the incorporation of MEL findings into broader programme decision-making and adjustments.

While some internal evaluations have been conducted, such as the review of the Civic Engagement Division, the MEL team noted that their findings are only shared with the Senior Adviser and not systematically elevated to management for reflection and response. Moreover, the staff lack clarity on how these evaluations are used.

Challenges are compounded by staffing and budget shortfalls. The MEL unit currently lacks a dedicated director and highlighted that only one or two field visits per month are possible due to manpower limitations. To function meaningfully, the team has called for at least 3 percent of the total annual programme budget to be earmarked for MEL, along with enhanced leadership and clearer operational authority.

While all divisions, including Research and Policy and Outreach and Communication, contribute to the MIS and donor reporting, the evaluation team was informed of persistent coordination challenges across units. These reports suggest that beyond routine information sharing, there is limited strategic integration, which hampers triangulation of findings, constrains cross-programme learning, and reduces the potential for evidence-based adaptation. The issue appears to stem less from technical gaps and more from siloed practices and insufficient internal dialogue.

Despite these limitations, the MEL unit has demonstrated initiative in designing tools and conducting data reviews, particularly through the MIS and limited field-level engagements. The team acknowledged that it is still too early to observe significant impact or behavioural shifts resulting from MEL-driven adaptation. As one member summarised, “So far, we are not getting any impact out of it yet. We need more time, at least 3-5 years, to get the minimum impact-level results from PACTA. This reflects a recognition that the current stage of

implementation is insufficient to meaningfully assess behavioural or systemic changes, rather than a conclusion about the ineffectiveness of MEL efforts.

TIB management appears aware of these institutional constraints. In discussions with the management team, funding and structural exclusion were both raised as major barriers to adaptive learning. Management acknowledged the need for greater engagement with communities and technological refinement of tools such as PACTApp, but admitted that resource scarcity and lack of formal MEL integration are holding back progress.

The evaluation assessed that the level of MEL budget and capacity may have limited PACTA's ability to institutionalise learning. Although PACTApp collected over 4,500 complaints by 2025, these data were not triangulated with service delivery indicators or feedback from ACGs and CCCs. Staff constraints and the absence of a structured learning framework meant that lessons remained fragmented, often captured informally at the field level. This may have limited the programme's responsiveness to contextual shifts, such as changes in local governance priorities or emerging corruption risks.

This under-investment in MEL stands in contrast to the budgetary commitment made to ICT infrastructure, with nearly USD 36,500 spent on system maintenance in 2025 alone²⁹. Donor consultations raised concerns that this imbalance undermined the programme's strategic learning capacity and reduced its ability to demonstrate results-based management. Two key stakeholders stated that without strengthening the MEL system, "there is no way to know if the programme is achieving its objectives, let alone whether it is doing so efficiently". To this end, the weight of external and governance-level feedback underscores the urgent need to bolster MEL as a core enabling pillar of adaptive and accountable programming."

3.4 SUSTAINABILITY

EQ 4. To what extent are PACTA's results and practices likely to be sustained, replicated, or scaled?

EQ4.1: What early signs exist that anti-corruption tools, approaches, or partnerships are being institutionalised within local government structures?

PACTA's long-term sustainability remains contingent on a mix of institutional, financial, and political factors. While there are promising signs of ownership, policy responsiveness, and local adaptation, the programme's future hinges on donor continuity, state cooperation, and internal strategic positioning of its tools and networks within governance ecosystems.

PACTA's long-term sustainability requires the enhanced quality of community participation, that is crucial and complementary to social mobilization; the scale and scope of community

²⁹ PACTApp Maintenance document and PACTA Project Document

involvement are important as drivers of development. **It is, therefore, necessary that communities be socially mobilized and encouraged to form associations for anticorruption initiatives, as much as possible, beyond the PACTA project.** As a social mobilization initiative, a critical issue is whether what PACTA and its volunteer partners do is inspiring individuals, groups or societies to do more than expected, and in a sustained manner. There are signs that this is taking place among many individuals who have benefitted from PACTA's support and facilitation. If this is translated to institutions, including educational establishment that permanently work with youth, the effects of PACTA's contributions could, in theory, be replicated and scaled up.

The survey responses indicate a high level of confidence among stakeholders in the long-term sustainability of PACTA's anti-corruption tools and practices. Out of a total of 689 respondents across ACG, CCC, and YES groups, 561 participants (approximately 81 percent) either agreed or strongly agreed that these tools will continue to promote communication, encourage participation, and support communities in pursuing their anti-corruption goals even after the project ends.

A small proportion remained undecided (80 respondents, 12 percent), while only 5 percent expressed disagreement or strong disagreement (32 respondents in total). This distribution reinforces qualitative evaluation findings that sustainability prospects are supported not only by donor commitment but also by local adoption, behavioural change, and ownership. As noted in the evaluation, sustained results depend on whether communities are encouraged and empowered to continue mobilising and applying PACTA's methodologies, tools, and networks.

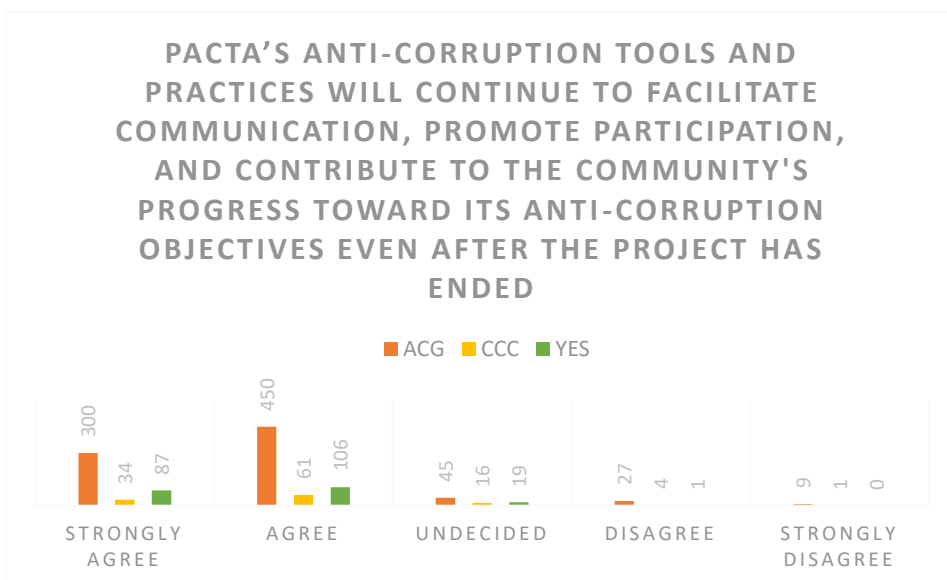


Figure 7 Community Perceptions of the Long-Term Usefulness of PACTA Tools and Practices

These results confirm the programme's success in embedding accountability practices at community level. Evidence from focus groups and institutional assessments supports this view: CCCs, ACGs, and YES groups are increasingly recognised as drivers of sustained monitoring,

local advocacy, and social accountability. Local authorities have begun to respond to citizen submissions made through PACTApp and to integrate recommendations from community groups into service delivery plans.

At the same time, sustainability is not guaranteed. The evaluation highlights that PACTA's long-term viability still hinges on donor continuity, state cooperation, and effective institutionalisation of participatory tools. A small share of undecided respondents (3–5 percent) reflects ongoing challenges in digital access and uneven institutional uptake.

These results suggest that PACTA's sustainability rests not only on donor support, but increasingly on community-level structures and volunteer engagement. By embedding accountability practices through CCCs, ACGs, and YES groups, the programme has fostered a durable sense of responsibility among citizens and local institutions. However, a small share of undecided responses (3–5 percent) indicates that sustaining momentum will require continued reinforcement, especially in areas where digital tools or institutional partnerships are weaker.

There is **documented evidence of PACTA's institutionalisation through both formal partnerships and informal uptake of tools and practices**. Several local authorities and sectoral institutions have formally responded to citizen submissions made through PACTApp and ACG platforms. For example, in Madhupur, public hearings co-facilitated by ACGs and CCCs led to documented commitments by **Land Office staff** to improve transparency and service standards, which were subsequently monitored with community feedback mechanisms³⁰.

Furthermore, **School Management Committees, Upazila Health Offices, and Local Education Officers** have incorporated ACG or YES-recommended actions into their plans, such as repairing sanitation infrastructure, ensuring equitable access for female students, or improving teacher presence³¹. These reflect the **early uptake of participatory monitoring norms**, although they remain localised and fragile.

However, institutionalisation remains **highly dependent on personalities and champions**, availability of technical expertise and funds to maintain the digital solutions, including a formal MOUs at the Upazila or District level **to systematise PACTA tools within government monitoring processes**.

At the national level, while the Anti-Corruption Commission (ACC) and the Information Commission have engaged in dialogue, **the evaluation found no policy or regulatory changes explicitly adopting PACTA's civic engagement/social mobilisation mechanisms**³².

³⁰ Interview with the stakeholders.

³¹ PACTA evaluation Case 3, Ramkrishnobar Primary School (2024); PACTA evaluation Case 7, Shahabajpur High School (2024).

³² FGD 5(March 2025).

However, TIB and the ACC have signed a five-year Memorandum of Understanding (MoU) on September 24, 2025, to strengthen their collaborative efforts in combating corruption. This agreement, which runs from October 1, 2025, to September 30, 2030, will focus on joint initiatives like public awareness campaigns, ethics promotion, research, and policy dialogue to foster transparency and accountability in national institutions. It offers new entry points for the two organisations to develop and strengthen the skills and resources of both organisations through training, resource sharing, and collaborative projects. This partnership has the potential to establish a framework for cooperation to achieve shared goals, such as enhancing expertise in a specific sector, promoting continuous professional development, or improving public sector efficiency.

EQ4.2: How has PACTA fostered local ownership, peer learning, and institutional commitment to sustain positive outcomes?

PACTA's sustainability prospects are partly driven by **the deep embedding of CCCs, ACGs, and YES groups at the grassroots level**. The model of joint action planning between CCCs and service providers has become more structured in regions like Nilphamari and Rangpur, where **monthly coordination meetings** are now held autonomously by local administrations with support from the CCCs.

Moreover, **peer learning has been supported through exposure visits, training exchanges, and south-south learning platforms** organised by TIB between CCCs across districts. This has allowed local champions to share innovations (e.g. digital tracking boards, grievance registers) and contextualise best practices. Participants in FGDs confirmed that CCC volunteers see their work as a form of civic duty, and several ACG members expressed intent to continue advocacy even beyond the PACTA lifecycle³³.

Institutional commitment is also growing in some cases, as evidenced by CCCs being invited to participate in school management and health oversight bodies. However, **these relationships remain ad hoc and undocumented**, raising concerns about whether such arrangements can be sustained after donor support ends³⁴.

Survey findings show strong agreement among respondents that PACTA has contributed to building local ownership, learning, and sustained commitment to reducing corruption and increasing accountability in key sectors such as health, education, environment, land management, and construction. Out of 1,188 respondents, 318 from ACG, 35 from CCC, and 82 from YES strongly agreed with this statement, while 480 ACG, 74 CCC, and 116 YES respondents agreed.

Only 40 respondents were undecided, and 12 expressed disagreements. No respondents selected "strongly disagree." These results suggest that PACTA has effectively fostered long-

³³ FGD 4 (March 2025).

³⁴ Interview with stakeholders (April 2025).

term engagement and local capacity for anti-corruption work across thematic areas, with high levels of ownership reported across all community groups.

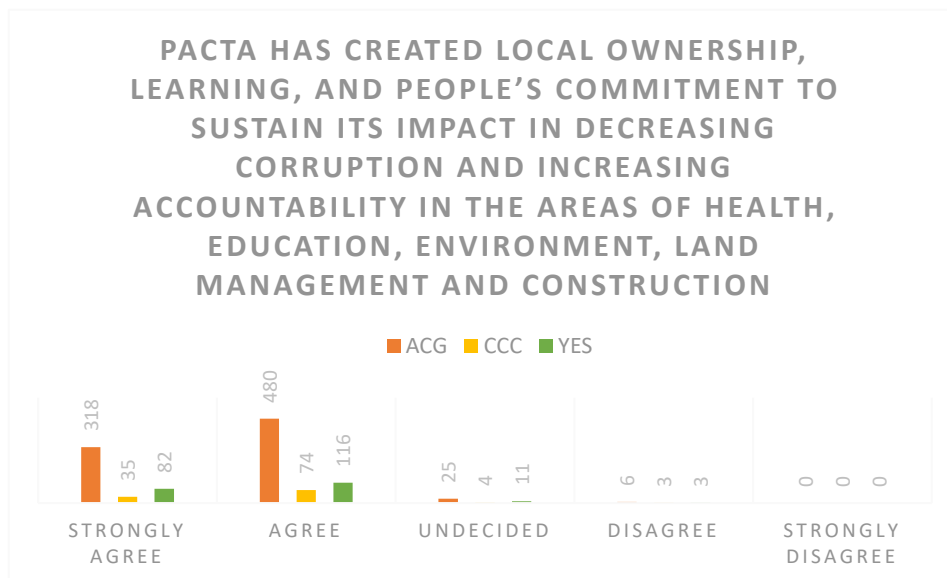


Figure 8 Community Perceptions of PACTA's Contribution to Sustained Local Ownership and Accountability

EQ4.3: What risks exist to the financial, institutional, or political sustainability of results, and how are these being mitigated?

The primary financial risk to PACTA's results sustainability relates to the **high dependency on external donor funding**, with Sida providing over 80 percent of PACTA's budget between 2022 and 2025³⁵. As of March 2025, PACTA had spent 65 percent of its allocated budget (USD 490,564 out of 750,000), raising concerns about the programme's capacity to maintain activities through 2026 without additional co-financing³⁶.

To manage shortfalls, TIB implemented austerity measures in 2024–2025, including **borrowing from staff provident and gratuity funds, reducing staffing from 178 to 93, and freezing recruitment and innovation lines**³⁷ borrowing from staff provident and gratuity funds, reducing staffing from 178 to 93 and freezing recruitment and innovation lines. These actions may help to avert programme suspension but may also limit future adaptability and impact.

On the institutional side, the lack of formalised partnerships with ministries or LGIs poses a risk to scaling. While there is national-level appreciation of TIB's advocacy (including Ministry-level uptake of education policy briefs), **the absence of formal handover strategies or policy commitments** constrains systemic uptake³⁷.

³⁵ PACTA Funding Scenario (2022–2026) (TIB 2025) 3.

³⁶ Revised PACTA Budget (23 May 2025).

³⁷ PACTA Research and Policy Briefs (TIB 2024).

Politically, TIB and its affiliate programmes like PACTA continue to face reputational challenges. Some stakeholders perceive TIB's work as politically motivated, a view that was flagged in interviews and media analysis. While the evaluation found no evidence to substantiate these claims, **perceived bias remains a reputational risk** that could hinder government buy-in³⁸.

Mitigation efforts include **public communication strategies, careful positioning of CCCs as non-partisan spaces**, and efforts to align messaging with national development priorities, such as the 8th Five-Year Plan and the National Integrity Strategy. Nonetheless, the shrinking civic space and donor fatigue in the anti-corruption field pose systemic threats to long-term sustainability.

³⁸ Interview with stakeholders (April 2025);

Objective 2: To provide options for restructuring and downsizing the PACTA programme given funding constraints

Organisational and Strategic Options for Downsizing

EQ5. What are feasible, cost-effective options for downsizing PACTA while maintaining its core strategic focus and delivery capacity?

General Issues Emerging from the SWOT Analysis

In view of the current funding predicament beyond December 2026, TIB/PACTA has no recourse but to significantly downsize its operations under the auspices of an “interim” strategy or a “bridging phase” (it could even be envisaged as “PACTA Phase II” but with certain operational modifications). An interim/bridging strategy (2027–2029) gives TIB the space to maintain continuity, refine and embed the PACTA intervention, adapt to changing contexts, strengthen partnerships and funding base, and prepare a more evidence-based and impactful long-term strategy for 2030 onward.

Downsizing would obviously involve substantive reduction of staff and project activities and introducing systemic change options where the main focus would be on keeping core activities alive using alternative approaches, maintaining flagship initiatives at a bare minimum so as not to lose TIB’s substantive reputation built up over decades, strengthening internal capacity, ensuring better resource allocation and, most importantly, diversifying funding sources, while reflecting on the best possible ways to re-engaging communities to build trust and support for future operations.

This downsizing strategy requires a clear assessment of the current situation that might even entail a revised mission and vision reflecting the new reality, setting realistic goals, and developing an adaptable action plan that prioritizes sustainable impact and improved governance. It is to this end that a two-day (27-28 August) SWOT exercise was undertaken with TIB staff, representing management, the programmatic divisions, including field level staff, in order to identify internal Strengths and Weaknesses (e.g., passionate volunteers vs. limited funding) and external Opportunities and Threats (e.g., potential partnerships vs. shifting donor trends), and use such insights - along with the emerging evaluation data from interviews, focused group discussions, case studies and survey - to develop a clear interim strategy that could leverage strengths and opportunities while mitigating weaknesses and threats to ensure TIB’s/PACTA’s long-term viability and mission effectiveness. See Annex x for the SWOT analysis and presentations on downsizing.

EQ5.1 What are feasible, cost-effective options for downsizing PACTA while maintaining its core strategic focus and delivery capacity?

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

A general Cost-Benefit Analysis based on the evaluation findings and the SWOT feedback, suggest that downsizing will help to significantly reduce administrative, organisational and programmatic costs and improve TIB's sustainability beyond December 2026. However, a key challenge is determining to what extent. The potential benefits include streamlining TIB operations towards more efficient resource allocation and improving financial accountability with a clear focus on core activities. More specifically, discussions around feasible, cost-effective options for downsizing PACTA revolved around:

Staff Reduction for Streamlined Operations: Significant staff reduction, reduction of infrastructure costs and shifting from full-time to part-time/consultant roles, especially in non-core functions;

Programme redesign: Exploring ways of improving PACTA's effectiveness, relevance, and efficiency by updating its structure, content, and delivery methods to better align with new goals, new technologies, and stakeholders' needs. This has to be an iterative process focusing on gathering data, defining clear revised outcomes, collaborating with stakeholders, and ensuring PACTA remains impactful and meets emerging challenges. For instance, "a more community led approach will be adopted" where the current 45 CCCs will help to identify and uphold citizens' demand with the support of 45 "Field Mobilizers" recruited from the respective CCC areas.

Cost-Effective Delivery Mechanisms: Limited physical operational hubs have been proposed ("12-15") for the effective field coordination by the Area/Cluster Coordinators. This will be accompanied with more effective use of digital tools to increase use of online platforms for training, advocacy, and monitoring, reducing travel and venue costs; the idea is to regularly use hybrid forms of engagement, combining smaller in-person events with virtual components and fully exploiting open-source resources - i.e. use freely available digital tools for data collection, analysis, and communication. Also, rely more on the volunteer networks (ACG, CCC & YES) and local partners to reduce overhead.

Partnerships and Leverage: Engage with traditional and non-traditional donors for continuous fundraising activities, forge new partnerships with the private sector and strengthen partnerships government entities - like the Anti-corruption Commission; engage with academic/research institutions so as to use interns/researchers to support evidence generation at low cost.

Monitoring and Adaptation: Introduce more effective, targeted M&E by focusing on a few key impact indicators rather than broad monitoring; apply the principle of "Pilot-then-scale": Test smaller interventions before wider roll-out, and ensure continuously adjust efforts based on cost-benefit evidence.

More shared services: Pool administrative, finance, and IT support across the programme and operational divisions.

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

These options would allow TIB to concentrate on its most effective flagship programmes, potentially help to streamline operations and improve impact without compromising its mandate and strategic focus.

EQ5.1.1 What are the comparative costs and benefits of the downsizing options under consideration?

TIB's downsizing was framed in terms of three interrelated options for downsizing that were analysed through a SWOT lens: (1) staff reduction, (2) programme redesign, and (3) systemic change. Each presents distinct cost-benefit profiles, implementation risks, and strategic implications for PACTA's future.

1. Staff Reduction

This is the most immediate and operationally straightforward downsizing pathway, aimed at rapidly reducing costs.

- **Costs:** This approach entails the immediate loss of institutional capacity, skills, and institutional memory. It may lead to demoralisation of remaining staff, higher turnover risk, and potential severance or legal liabilities. These were not fully examined in available documentation.
- **Benefits:** The primary benefit lies in short-term cost savings, particularly in salaries and operational overhead. For example, reducing the number of CCCs from 45 to 8 and scaling back the Dhaka office would cut expenditures significantly. It also allows for quick stabilisation of core costs.
- **Strategic considerations:** This scenario involves narrowing the scope of TIB's programme to focus on signature interventions, implemented with greater efficiency through digital tools, evidence-based adaptations, and community volunteer ownership. Complementary strategies include collaboration with external actors, in-kind resource mobilisation, and community trust-building.

3.5 PROGRAMME REDESIGN

This component proposes realigning PACTA's interventions to improve effectiveness and efficiency while maintaining operational continuity.

- **Costs:** It requires dedicated planning time, transitional funding, and may cause temporary disruption to ongoing operations, with potential reputational or stakeholder satisfaction impacts.
- **Benefits:** It improves alignment with evolving national priorities and programme realities, supports targeting of inefficiencies, and offers moderate cost savings over time. It preserves PACTA's visibility and relevance while enabling structural simplification.

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

- **Strategic considerations:** The redesign approach retains core interventions but adapts them based on research, digital innovations, and partnership models. It emphasises qualitative outcomes, community engagement, and sustainability through shared ownership and demand-driven planning.

3.6 SYSTEMIC CHANGE

This component reflects a longer-term transformational restructuring of both the programme and the organisation.

- **Costs:** It involves the highest complexity and cost, requiring organisational restructuring, leadership commitment, and a cultural shift. Upfront investments are needed in training, systems, and strategic fundraising capacities.
- **Benefits:** Systemic change addresses root causes of inefficiency and positions PACTA for long-term sustainability and adaptability. It enables deeper organisational resilience, diversified funding, and stronger programmatic coherence.
- **Strategic considerations:** The approach includes reassessment of TIB's mission, vision, and staffing model, the design of a reduced but restructured PACTA 2, and the development of two parallel workstreams (programme and organisational sustainability). It promotes diversification of funding into core and project-specific streams, integration of digital solutions, and outsourcing of specialised tasks.

Comparative Summary

- **Staff reduction** offers immediate savings but with high human and reputational costs, and limited strategic upside.
- **Programme redesign** provides a balanced approach with moderate cost savings and improved effectiveness if managed well, although under the present circumstances, bearing in mind fund deficits, programme redesign will also entail staff reduction.
- **Systemic change** is the most ambitious and resource-intensive, but also offers the strongest potential for long-term sustainability, institutional resilience, and strategic repositioning of both PACTA and TIB.

Table 3 Summary Comparison of Cost, Disruption, Strategic Value, and Sustainability across Downsizing Options

Option	Cost Efficiency		Organisational Disruption	Strategic Depth	Sustainability Potential
Staff Reduction	High	(short term)	High	Low	Low

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

Programme Redesign	Moderate	Moderate	Moderate	Moderate
Systemic Change	Low (short term)	High	High	High

Each interlinked component involves trade-offs between short-term savings and long-term impact, and the choice depends on the organisation's appetite for risk, available transition resources, and commitment to sustaining anti-corruption programming under constrained conditions.

EQ5.2 Which geographic areas or constituencies should be prioritised based on performance, demand, or strategic value?

When it comes to geographic areas or specific group of people, there was general consensus between the TIB team that the organisation should balance **urban strategic hubs** (Dhaka, Chattogram, Gazipur, Narayanganj) for national-level visibility, with **vulnerable peripheries** (Hill Tracts, coastal belts, “chars”) to ensure inclusiveness, while continuing in **high-performing districts** (Rajshahi, Khulna) to consolidate credibility. This could be done through mobilizing volunteers through at least 8 regional hubs in line with the eight administrative divisions in the country, namely Barishal, Chattogram, Dhaka, Khulna, Rajshahi, Rangpur, Mymensingh, and Sylhet. These divisions serve as the first-order administrative units, with each division being further subdivided into a total of 64 districts or “Zilas” in the country.

Performance-based Prioritisation. High-impact regions like Khulna where TIB has demonstrated results: Districts where previous anti-corruption or civic engagement programs produced measurable outcomes (e.g., increased accountability in service delivery). Examples include Rajshahi Division: Rajshahi, - effective local engagement in education and health monitoring and Khulna Division: Khulna, Satkhira – where CCCs have actively monitored local governance and climate-related fund use.

Strong local networks: Areas with active Committees of Concerned Citizens (CCCs) or youth engagement platforms that can be scaled further.

Demand-driven Prioritisation. High citizen demand for accountability: Urban and peri-urban centers with rapid service expansion (health, education, land administration and general municipal services) where people express strong grievances. These are sectors with frequent corruption complaints where constituencies report recurring issues in public service delivery, land administration, or law enforcement -- areas important due to economic weight, large infrastructure projects, or governance risks. The districts with persistent corruption complaints, especially in public services include **Dhaka Division:** Dhaka (urban service delivery, land administration, health), Gazipur, Narayanganj (industrial hubs with high governance demand); **Sylhet Division:** Sylhet, Moulvibazar – remittance-dependent areas where land and service delivery disputes are frequent; and **Chattogram Division:** Chattogram city (port, customs, municipal governance).

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

Strategic Value-based Prioritisation. National influence hubs: Dhaka, Chattogram, and divisional headquarters where advocacy gains greater visibility and policy impact. Emerging “growth corridors”, I.e. areas tied to large infrastructure, industrial zones, or economic hubs, where risks of corruption are exponentially rising.

Marginalized or vulnerable regions: such as coastal belts, chars, and indigenous communities where governance gaps are severe and external oversight is minimal, such as Khulna Division: Mongla, Bagerhat (industrial zones, Sundarbans conservation); Barishal Division: Patuakhali, Bhola (coastal climate-vulnerable districts with governance gaps); and Rangpur Division: Kurigram, Gaibandha (high poverty-prone areas, governance neglect).

EQ5.3 Which thematic areas are essential, optional, or redundant under reduced funding?

In the context of reduced financial resources, a clear thematic prioritisation is necessary to preserve the core identity and strategic relevance of TIB and its PACTA programme. The evaluation identified three tiers of thematic importance based on alignment with TIB’s mandate, cost-efficiency, stakeholder expectations, and potential for impact.

I. Essential Thematic Areas (Non-Negotiable). These areas are foundational to TIB’s institutional credibility, strategic relevance, and long-term impact. They are considered indispensable and must be safeguarded even under fiscal constraints.

- **Anti-Corruption Advocacy and Policy Reform**
Central to TIB’s mission and public legitimacy, this thematic area anchors its role as a national watchdog and policy influencer.
- **Good Governance and Accountability in Public Institutions**
A critical area for systemic change and institutional integrity, this work supports long-term reform in governance structures.
- **Citizen Engagement and Awareness**
Ensures grassroots support and civic pressure for transparency. It also legitimises TIB’s interventions by fostering demand-driven change.
- **Research and Evidence-Based Monitoring**
Including tools such as the Corruption Perceptions Index and sectoral studies, this underpins all advocacy and reform efforts. It also builds trust with donors, media, and policy actors.

II. Optional Thematic Areas (Retain in Scaled-Down Form). These areas remain relevant but can be selectively reduced, consolidated, or adapted to lower-cost models without fundamentally undermining the integrity of the programme.

- **Sector-Specific Programmes**
Work in sectors such as health, education, and land administration is important but can be focused on the most corruption-prone sectors. Strategic trimming would allow concentration of effort and resources where impact is most likely.

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

- **Youth and Volunteer Networks (ACGs and YES groups)**

These networks contribute to outreach and leadership development but can operate under a leaner model. Leadership structures may be retained while shifting towards more self-organised, volunteer-driven initiatives.

- **Local-Level Advocacy Chapters (CCCs)**

While valuable for decentralised advocacy, the current number of local chapters can be significantly reduced. Consolidation around strategic geographic hubs would ensure continued presence without overextending capacity.

III. Redundant Thematic Areas or those that might be streamlined (Under Severe Constraints).

These areas, mostly identified through FGDs conducted with TIB's three key divisions, appear to either duplicate efforts or consume disproportionate resources relative to their strategic value and could be discontinued, merged, or digitised under tighter budgets.

- **Large-Scale Campaigns and Public Events**

Although symbolically important, these are resource-intensive. Digital advocacy can serve as a more cost-effective alternative with comparable reach.

- **Extensive Capacity-Building Workshops and Trainings**

These can be integrated into core programming, offered online, or incorporated into ongoing advocacy efforts at a lower cost.

- **Overlapping Thematic Areas**

Multiple thematic streams related to governance, transparency, and anti-corruption are currently fragmented. It might be possible to convert these into smaller number of broader, multi-functional initiatives to avoid duplication and enhance coherence.

Q5.4 What operational and staffing models (e.g. regional hubs, online platforms, lean teams) are viable for scaled-down implementation?

Under constrained budgets, several operational and staffing models were identified by TIB's three working groups under the SWOT exercise as viable for scaled-down implementation of PACTA. These models are designed to optimise cost-efficiency, maintain visibility and outreach, and preserve core functions while minimising fixed overheads. Five potential models were identified in detail, each with distinct features, advantages, and risks.

1. Operational Hub Model

- **Structure:** Establishes a limited number of strategically located regional hubs, replacing a broader nationwide presence.
- **Staffing:** Small core teams based in hubs (e.g., programme manager, advocacy officer, M&E support) working with local volunteers or CSO partners.
- **Advantages:** Maintains regional visibility and localised programming at reduced cost; enables quicker responses to context-specific issues.

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

- **Risks:** Geographic coverage remains limited and highly dependent on the quality and capacity of local actors.

2. Lean Central Team with Partnerships

- **Structure:** A consolidated Dhaka-based team responsible for strategic leadership, research, and national advocacy, while implementation is delegated to local partners (NGOs, academic institutions, community groups).
- **Staffing:** Focuses on programme design, MEL, and knowledge management, with minimal involvement in direct implementation.
- **Advantages:** Highly cost-efficient and scalable; leverages partner networks and reduces operational burden.
- **Risks:** Requires strong coordination and quality assurance systems to mitigate variability in partner performance.

3. Digital/Online Platform Model

- **Structure:** Shifts a significant portion of public engagement, reporting, and awareness-raising to digital platforms (web portals, social media, mobile apps).
- **Staffing:** A lean team with IT specialists, content creators, and community managers.
- **Advantages:** Offers wide outreach with low operational costs; effective for youth and urban audiences.
- **Risks:** Limited utility in rural areas with low internet penetration and among digitally excluded populations.

4. Hybrid Hub–Digital Model

- **Structure:** Combines a small HQ in Dhaka with 2–3 regional hubs and a robust digital presence.
- **Staffing:** Balanced team including policy/advocacy staff at HQ, lean field teams in hubs, and a digital engagement unit.
- **Advantages:** Provides multi-level presence, flexible adaptation to donor cycles, and resilience to external shocks (e.g. pandemic disruptions).
- **Risks:** Coordination across multiple modalities can be complex; requires well-defined processes and strong communication systems.

5. Volunteer-Driven or Community Network Model

- **Structure:** Relies on a decentralised network of trained volunteers, civic groups, and alumni of TIB programmes, with minimal permanent staff.

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

- **Staffing:** Small central team focused on volunteer mobilisation, training, and support.
- **Advantages:** Extremely low-cost model fosters strong local ownership and sustainability.
- **Risks:** High volunteer turnover, uneven commitment, and a constant need for support and supervision.

6. Cross-Cutting Operational Principles

Across all models, certain enabling features were identified as critical for successful scaled-down implementation:

- **Lean and agile teams** that focus on process optimisation and waste reduction.
- **Digital infrastructure** to support remote or hybrid work models, enabling access to national and global talent pools.
- **Integrated planning and cross-functional collaboration**, particularly between central and field-based teams.
- **Trust and shared purpose**, especially when relying on mixed teams of staff, partners, and volunteers.

No single model can be universally applied. It is important for TIB to further assess its financial status by mid-2026 in order to pin down the option that would serve the organization best. The viability of each option depends on contextual factors including funding levels (e.g. getting additional funding from local private sources by the end of 2026), geographic focus, strategic priorities, and institutional capacity. A phased hybrid model combining lean central leadership, limited regional presence, and expanded digital infrastructure appears most promising for PACTA. However, its effectiveness will ultimately depend on TIB's ability to foster collaboration, streamline workflows, and manage distributed teams with a clear focus on value creation under constraint.

EQ5.5 What aspects of PACTA's work could be sustained without donor funding, and which are fully dependent on external support?

Based on the evaluative evidence and SWOT analyses it would be fair to say that PACTA could sustain its core activities, such as research, advocacy, and community outreach, through local partnerships and innovative fundraising like corporate social responsibility (CSR) and community crowdfunding but requires significant external donor support for its advanced big data-based interventions and large-scale implementation. While TIB maintains operational independence, the strategic application of big data, capacity building, and extensive communication campaigns necessitate external funding to achieve significant and quantifiable impacts against corruption.

OBJECTIVE 2: TO PROVIDE OPTIONS FOR RESTRUCTURING AND DOWNSIZING THE PACTA PROGRAMME GIVEN FUNDING CONSTRAINTS

Aspects Potentially Sustainable .Without Donor FundingPACTA’s grassroots and low-cost social mobilisation components demonstrate a level of sustainability that does not necessarily depend on external financing. These activities can be maintained through community ownership, voluntary contributions, and innovative local fundraising.

Community Engagement and Local Advocacy. TIB’s youth-led networks—YES groups and Active Citizens Groups (ACGs)—have shown strong community anchoring. Their work in awareness-raising, monitoring, and civic mobilisation could continue with limited operational support, relying on volunteers and low-cost coordination mechanisms.

PACTApp for Community Monitoring. If the infrastructure is already in place, the PACTApp can be sustained at a basic operational level using local technical expertise. Its continued use for local-level evidence collection and monitoring may require only minimal maintenance and periodic updates.

Collaboration with Local Institutions. Relationships built with local government officials, civil society organisations, and service providers could be sustained based on mutual interest and shared governance goals. These partnerships may not require direct donor funding once embedded into institutional practices.

Community-Based Fundraising. Smaller-scale initiatives, particularly in sectors such as health, education, and ICT, could potentially attract local philanthropic support, corporate social responsibility (CSR) contributions, or be financed through community crowdfunding and charity events.

Aspects Fully Dependent on Donor Funding

Other aspects of PACTA’s programming require substantial financial, technical, or logistical support that is not currently feasible to sustain locally without external funding. These include the following:

Big Data-Based Interventions. The integration of big data platforms and digital social accountability tools—key features of PACTA’s evolving strategy—necessitate significant investment in technology, data infrastructure, and analytical capacity, all of which remain beyond the reach of local funding mechanisms.

Large-Scale Advocacy and Policy Reform Efforts. National-level campaigns aimed at legislative or institutional reform, particularly those involving coordination across ministries and sectors, require sustained donor support for research, engagement, and policy dialogue at scale.

Extensive Capacity-Building Programmes. Training initiatives for public officials, civil society actors, and community monitors—particularly in technical or emerging areas such as climate governance or digital accountability—demand external financing for training design, materials, facilitation, and follow-up support.

Advanced Communications and Outreach. National media campaigns, public awareness events, and multi-channel communications strategies require substantial resources to achieve visibility and influence. These are difficult to fund locally and often depend on donor-funded communications budgets.

Specialised Expertise and Technology. High-end research, digital development, or monitoring tools that involve external consultants, international benchmarks, or cross-country comparisons remain dependent on donor financing to ensure technical quality and comparative value.

While TIB, through PACTA, has developed a strong foundation for locally rooted anti-corruption advocacy, the scope and ambition of its work—particularly in technology-driven monitoring, national reform advocacy, and capacity building—continue to require external donor support. A dual strategy is needed: safeguarding core locally-sustainable elements through community partnerships and alternative funding, while strategically mobilising donor resources for high-impact, high-cost interventions

Objective 3: Actionable recommendations for the next two years of PACTA

Forward-looking Recommendations and Implementation

EQ6. What strategic and operational adjustments should TIB adopt to ensure the continued relevance, impact, and sustainability of PACTA?

EQ6.1. Strategic Focus: Alignment with Donor Priorities and National Governance Trends

The evaluation recommends a strategic recalibration of both PACTA's programme design and operational model to safeguard its core functions while adapting to a reduced funding environment. TIB must consolidate its identity as a trusted civic actor while adjusting its delivery systems, funding strategy, and monitoring capacity. This requires a shift from broad-based implementation to more focused, data-driven, and partnership-enabled approaches that preserve impact and visibility. To ensure continued relevance, PACTA must more clearly align its objectives and narrative with evolving donor and national governance priorities. Donor expectations are increasingly focused on digital transformation, locally led development, climate-related integrity, inclusive governance and better business environment. TIB should strengthen the framing of PACTA's work around these themes, while continuing to anchor it in Bangladesh's own national policy frameworks, including the 8th Five Year Plan, the National Integrity Strategy, and Smart Bangladesh Vision 2041. PACTA's emphasis on rights-based service delivery, participatory monitoring, and youth engagement already speaks to these priorities but must be communicated more strategically. TIB should further strengthen its position as a watchdog intermediary facilitating state–citizen dialogue on governance reform, particularly in sectors such as health, education, land, and climate finance.

Recommended Adjustments:

- Reframe PACTA's strategic narrative to explicitly align with the *8th Five Year Plan*, *National Integrity Strategy*, and *Smart Bangladesh Vision 2041*.
- Highlight measurable contributions to SDG 16 (Peace, Justice and Strong Institutions) and SDG 13 (Climate Action), especially through digital grievance redress, community monitoring, and environmental governance initiatives.
- Emphasise civic tech, youth engagement, gender inclusion, and community-based oversight as pathways to innovation and resilience.

- Position TIB as a credible intermediary in local-national governance dialogues, particularly in high-risk sectors (education, land, health, climate financing).

EQ6.2 Operationalising Downsizing: Prioritisation, Sequencing, and Resource Reallocation

The programme redesign scenario presents the most viable pathway for downsizing, as it balances cost-efficiency with programmatic continuity. Downsizing should occur in a phased manner. In the short term, TIB should reduce the number of active CCCs to align with the country's eight administrative divisions, retaining the most effective volunteer leaders and replacing full-time field coordination with part-time or digital field mobilisers. Non-essential staffing should be further reduced or shifted to consultant-based arrangements. Resources saved through these measures should be redirected toward digital engagement, research, and monitoring systems. In the medium term, TIB should establish two to three regional micro-hubs supported by a lean central team in Dhaka, while expanding the use of remote tools to support local-level implementation. By streamlining fixed costs and outsourcing highly specialised tasks, the organisation can maintain presence and influence without overstretching resources.

Recommended Adjustments:

Phase I (Short-Term, 2025–2026):

- Reduce the number of CCCs from 45 to 8 (aligned with the eight Divisions).
- Retain core volunteer leaders and shift to part-time or consultant roles for non-core staff.
- Introduce digital field mobilisers to replace full-time area coordinators.
- Defer or eliminate high-cost events and campaigns.

Phase II (2026–2029):

- Establish 8 regional micro-hubs and maintain a lean central team in Dhaka.
- Strengthen digital engagement and remote implementation capacity.
- Outsource specialised tasks (e.g., research, tech upgrades, comms) where in-house capacity is not cost-effective.
- Pilot a community-led model in 2–3 divisions before scaling.

Budgetary Adjustments:

- Prioritise expenditure on digital tools, knowledge generation, and MEL.
- Reduce fixed administrative costs by pooling services across programme units.

EQ6.3 Adapting MEL Systems to the New Model

The evaluation found that PACTA's current MEL system lacks the strategic reach necessary to inform adaptation or demonstrate impact. To address this, TIB should introduce a dedicated

MEL budget line and refocus its monitoring framework on fewer but more meaningful outcome indicators, such as changes in service responsiveness, institutional engagement, and citizen empowerment. PACTApp data should be fully integrated into the monitoring system, allowing real-time tracking of grievances, geographic trends, and institutional responses. MEL staff should be embedded in programme decision-making to ensure that evidence informs strategy. Feedback loops between the community-level actions and central planning should be formalised, and periodic MEL reviews should be institutionalised to support learning and course correction. These changes will enable MEL to function not only as a compliance mechanism but as a critical driver of programme quality, learning, and accountability.

Recommended Adjustments:

- Establish a **dedicated MEL budget line**, targeting at least 3 percent of the annual programme budget.
- Prioritise **fewer but more meaningful indicators** that focus on outcome-level changes, such as citizen empowerment, service responsiveness, and institutional adaptation.
- Digitally integrate MEL and PACTApp data for real-time tracking and geographic disaggregation.
- Embed MEL staff into management discussions to ensure learning feeds into programme decisions.
- Develop a light-touch **feedback-to-action loop** at local level to track issue resolution and citizen satisfaction.
- Initiate a mid-term MEL systems review in 2026 to refine tools and processes.

EQ6.4 Strategic Partnerships and Investments for Transition

To protect institutional credibility and programme effectiveness during the transition period, TIB must expand and diversify its partnerships. In the short term, the organisation should formalise collaborations with key government entities at both national and sub-national levels, particularly those where PACTA tools have already demonstrated value. These partnerships can help institutionalise participatory monitoring practices and ensure that local authorities assume greater ownership. At the same time, TIB should begin mobilising non-traditional sources of support, including corporate social responsibility contributions and local philanthropic funds, particularly for community-based or digital initiatives. In the medium term, new partnerships with academic institutions, civic tech platforms, and regional accountability networks can help sustain the programme's intellectual capital and visibility. Regional peer learning platforms may also serve to reposition TIB within South Asia's civic governance space, creating new funding and influence opportunities.

Recommended Adjustments:**Short-term (2025–2026):**

- Formalise collaborations with ACC, local authorities, and education/health departments through MoUs to institutionalise PACTA tools.
- Secure co-financing for digital platforms and sectoral research from CSR actors and local philanthropic sources.
- Leverage academic partnerships for low-cost research support and intern-based staffing.

Medium-term (2026–2029):

- Develop multi-donor funding proposals aligned with EU GAP III, Sida's new anti-corruption agenda, and UNDP local governance portfolios.
- Position TIB within national civic tech and social accountability ecosystems to attract innovation funding.
- Explore regional peer-learning partnerships (South-South) to increase visibility and co-learning.

EQ6.5 Implementation Roadmap and Risk Mitigation Measures

The evaluation supports the development of a structured roadmap for a 2025–2029 transition period, referred to in internal planning as a bridging or interim strategy. This strategy should begin with internal restructuring and the finalisation of PACTA's redesign by late 2025. Implementation of digital field mobilisation, downsizing of CCCs, and deployment of hybrid programme models should commence in early 2026. By mid-2026, the establishment of regional hubs, the rollout of revised MEL tools, and the formalisation of institutional partnerships should be underway. From 2027 onwards, scaled-up implementation can proceed based on the performance of early pilots and the availability of new funding streams.

Table 4 Proposed Roadmap.

Timeline	Key Milestones
Q4 2025	Finalise PACTA redesign, internal restructuring plan, MoUs with local authorities
Q1 2026	Launch 8 digital field mobilisation pilots and reduce CCC footprint
Q2 2026	Establish 2–3 regional hubs and test hybrid engagement models

OBJECTIVE 3: ACTIONABLE RECOMMENDATIONS FOR THE NEXT TWO YEARS OF PACTA

Q3–Q4 2026	Initiate donor dialogue, launch revised MEL framework
2027–2029	Scale redesigned model based on pilot results and funding availability

Several risks must be mitigated in parallel. Financial risks must be addressed through diversification of funding and more deliberate resource pooling across units. Institutional risks can be reduced by embedding PACTA practices within government systems through MoUs and co-owned accountability platforms. Political risks, including reputational concerns and resistance from local elites, must be managed through clear communication, continued neutrality, and alignment with government reform priorities. Operational risks, especially those related to coordination and technology, can be addressed by simplifying procedures, investing in staff capacity, and adopting modular implementation plans that allow flexibility. Finally, reputational risks should be countered by increasing transparency, amplifying community-level results, and reinforcing the programme’s integrity through evidence-based communications.

4 Evaluative Conclusions

4.1 PACTA STRENGTHENED CITIZEN-LED ACCOUNTABILITY AND ALIGNED WITH NATIONAL GOVERNANCE FRAMEWORKS.

The PACTA programme has made important contributions to strengthening citizen-led accountability in Bangladesh's governance landscape. Its strategic alignment with national anti-corruption, governance, and decentralisation frameworks—such as the National Integrity Strategy (NIS), the ACC Strategic Plan, and sectoral policies in health and education—provided a solid basis for relevance and local legitimacy. Notably, PACTA's grassroots structures (CCCs, ACGs, YES) have facilitated thousands of complaints and advocacy actions, many of which prompted administrative responses, such as improved infrastructure, complaint mechanisms, and disciplinary action against staff. Between 2022 and 2025, PACTA made measurable contributions to public discourse and policy reforms in Bangladesh. Its research informed over eight national policy changes and at least fifteen shifts in institutional practice, notably in procurement, land, education, NGO regulation, and environmental governance. Evidence was drawn from citizen feedback via platforms like PACTApp and KYC, which enhanced the credibility of advocacy efforts. TIB's reform proposals, such as those under the New Bangladesh platform, gained visibility and traction, with several taken up in draft laws or government directives. Some research also influenced global governance debates, including at the Green Climate Fund.

4.2 COMMUNITY-ROOTED MODELS AND DIGITAL TOOLS ENABLED INCLUSIVE CIVIC ENGAGEMENT AND INSTITUTIONAL COLLABORATION.

The project's success lies in its community-rooted model, the scale and diversity of civic engagement it mobilised, and the practical integration of digital tools like PACTApp. These enabled both systemic monitoring and direct redress. PACTA also fostered meaningful collaboration with public institutions, particularly at the local level, and elevated marginalised voices into formal governance dialogue—especially women, ethnic minorities, and economically disadvantaged groups. Its emphasis on participation, non-discrimination, transparency, and accountability was evident across both design and implementation, reflecting a strong application of human rights-based approaches.

4.3 WEAKNESSES IN MEL LIMITED THE ABILITY TO CAPTURE SYSTEMIC OUTCOMES AND INFORM DECISION-MAKING.

Several structural and strategic weaknesses limit the programme's long-term impact and sustainability. The monitoring system remained heavily output-oriented and insufficiently equipped to capture outcome-level change, particularly in terms of institutional responsiveness and corruption reduction. Although over 4,500 complaints were recorded via the PACTApp, the results framework lacked the granularity to link these to systemic improvements, and citizen-reported issues such as referral to private clinics, informal payments in schools, or discrimination in service access were not explicitly monitored. A disconnect between field-level learning and programme-level decision-making was evident, compounded by the absence of a fully resourced and integrated MEL function.

4.4 SEVERE FINANCIAL CONSTRAINTS LED TO DOWNSIZING, REDUCED ACTIVITIES, AND INCREASED DEPENDENCE ON EXTERNAL FUNDING.

Financially, PACTA experienced acute constraints. A shortfall of approximately USD 1.3 million by end-2024 led to significant downsizing, halting of outreach and research activities, and reliance on core funds. Although cost-control measures enabled operational continuity, these compromised innovation and adaptive flexibility. At the same time, PACTA's reliance on external funding, reputational pressures, and limited formal partnerships with state structures place its achievements at risk, especially beyond the current project cycle.

4.5 PACTA'S MODEL IS CREDIBLE AND IMPACTFUL BUT REQUIRES STRONGER MEL, SUSTAINABLE FINANCING, AND INSTITUTIONALISATION.

PACTA's model is credible, contextually relevant, and community-driven. It has achieved tangible service delivery and institutional results, particularly where civic action was persistent and well-supported. However, to maximise the long-term value of these gains, future programming should address its structural MEL gaps, develop sustainable resourcing strategies, and support greater self-reliance through empowering the volunteers and communities to address their own needs and development. In other words, institutionalise its tools and methods within governance systems to ensure continuity and scale. Collaborating with educational institutions is essential in empowering youth as agents of change by equipping them with TIB skills in anti-corruption awareness and investigative journalism, and encouraging the production of academic articles, among other initiatives.

4.6 DOWNSIZING IS NECESSARY AND FEASIBLE BUT REQUIRES PRIORITISATION AND FLEXIBLE OPERATIONAL MODELS.

The evaluation confirms that downsizing, while a difficult and complex process, is both necessary and feasible for sustaining the core functions of the PACTA programme in a constrained funding environment. However, the success of any downsizing strategy will depend on careful prioritisation, flexible operational models, and a clear distinction between core and non-essential activities.

4.7 PROGRAMME REDESIGN OFFERS THE MOST BALANCED OPTION, WHILE SYSTEMIC CHANGE PROVIDES LONG-TERM SUSTAINABILITY.

Among the three strategic options considered: staff reduction, programme redesign, and systemic change, programme redesign offers the most balanced path, allowing for cost-efficiency without compromising TIB's institutional identity. Systemic change, while resource-intensive, presents the most sustainable option in the long term, as it enables TIB to reconfigure its operating model, diversify funding, and build greater organisational resilience. Staff reduction alone, though offering immediate savings, risks undermining programmatic continuity and stakeholder trust if not accompanied by strategic reorientation.

4.8 ESSENTIAL THEMATIC AREAS MUST BE PRESERVED, WHILE OPTIONAL OR REDUNDANT ELEMENTS CAN BE SCALED BACK.

Clear distinctions must be made between essential thematic areas (such as anti-corruption advocacy, governance reform, evidence-based research, and community engagement) which must be preserved, and optional or redundant elements (such as overlapping thematic projects, large-scale campaigns, and extensive capacity-building efforts) which may be scaled back or discontinued.

4.9 LEANER, ADAPTIVE DELIVERY MODELS BASED ON REGIONAL HUBS, DIGITAL TOOLS, AND COMMUNITY OWNERSHIP ARE VIABLE.

Operationally, leaner and more adaptive models such as regional hubs, hybrid digital approaches, and stronger use of community-based structures emerge as viable frameworks for continued implementation. A small, centralised team supported by local partnerships and digital platforms can deliver essential functions while reducing fixed costs. Volunteer-driven models and community ownership can further enhance sustainability, particularly at the local level.

4.10 LOCAL PARTNERSHIPS CAN SUSTAIN SOME COMPONENTS, BUT CORE FUNCTIONS REMAIN DONOR-DEPENDENT.

Finally, while some aspects of PACTA's work (e.g., local advocacy, community monitoring, digital tools) show potential for continuation through local partnerships and alternative funding (such as CSR or crowdfunding), core components like big data analytics, national-level advocacy, and large-scale capacity development remain fully dependent on donor support. Persistent internal constraints: staffing gaps, funding delays, and lack of MEL - limited the ability to track and scale results. Overall, PACTA's strategy was effective where data was used strategically and engagement sustained, though systemic change remains hindered by broader structural and political barriers.

4.11 DOWNSIZING SHOULD BE SEEN AS STRATEGIC CONSOLIDATION TO SAFEGUARD IMPACT AND STRENGTHEN RESILIENCE.

Downsizing must be approached not as a reduction of ambition, but as an opportunity for strategic consolidation, institutional strengthening, and smarter use of limited resources. TIB's ability to navigate this transition will depend on its capacity to preserve core impact areas, innovate operationally, and align its programme delivery with a more diversified and resilient funding model. Transitioning to a more flexible funding model could help TIB diversify its income sources while maintaining its strategic focus. For instance, programme areas like technology and large-scale research could be positioned to attract donor contributions, whereas local-level advocacy and small-scale research could be sustained with more predictable or core funding. Such an approach would strengthen TIB's capacity to remain responsive and effective in an increasingly constrained funding environment.

5 Lessons Learned and Good Practices

5.1 LESSONS LEARNED

- The experience of PACTA confirms that maintaining wide-scale geographic coverage and a broad thematic focus is not sustainable under resource constraints. Programme relevance and impact can be preserved only by prioritising quality over coverage, focusing on sectors and locations with proven traction and community demand.
- A phased, evidence-informed approach to downsizing is more effective than reactive cost-cutting. While staff reduction offers immediate savings, its impact can be destabilising unless accompanied by programme redesign, stakeholder engagement, and careful sequencing.
- Digital transformation is a viable pathway to sustain engagement and monitoring, but it must be accompanied by parallel investments in digital inclusion. PACTApp and other tools demonstrated potential, but rural and digitally excluded populations remain at risk of marginalisation if digital-only models are pursued.
- Community ownership and decentralised structures (e.g., CCCs, ACGs, YES groups) can operate at low cost and deliver tangible outcomes. However, they require ongoing technical support, recognition by local authorities, and integration into formal accountability systems to remain effective and resilient.
- External donor funding is essential for innovations such as big data analytics, capacity-building, and high-impact national advocacy. However, basic community engagement, volunteer mobilisation, and local-level monitoring may be sustained through diversified and localised resource mobilisation strategies.
- The absence of outcome-level data in the MEL framework weakened strategic decision-making and limited TIB's ability to demonstrate systemic change. This underscores the need to invest early in adaptive MEL systems that can inform programme adjustments and donor engagement.
- Social mobilization is a dynamic, community-driven process that goes beyond fixed project timelines and goals to foster long-term self-reliance and sustainability. Project frameworks often impose external, time-bound objectives, but effective social mobilization requires flexibility, allowing communities to develop their own strategies, adapt to evolving needs, and sustain momentum independently. This evolution necessitates moving beyond the structured parameters of a single project like PACTA to build intrinsic community capacity and ownership.
- Finally, institutional credibility and programme resilience depend on the ability to adapt to external shocks, such as funding cuts or changing civic space. PACTA's experience

illustrates the importance of flexibility, internal learning, and a culture of continuous improvement.

5.2 GOOD PRACTICES

1. E-Governance to Reduce Discretion and Improve Transparency

Digitisation of public services has shown measurable reductions in petty corruption and discretion, particularly in land administration and citizen service delivery. In Bangladesh, digital land records and one-stop citizen service centres reduced opportunities for rent-seeking and increased satisfaction with service delivery.³⁹

Relevance for PACTA: PACTApp and other civic tech solutions can be expanded to monitor service delivery bottlenecks, automate citizen reporting, and enhance accountability through real-time dashboards.

2. Embedding Social Accountability Tools in Local Governance

Citizen report cards, open budget hearings, public grievance redress mechanisms, and participatory planning are proven tools in both South Asia and East Africa. When institutionalised within local government processes, they improve public trust and responsiveness.⁴⁰

Relevance for PACTA: CCCs, ACGs, and YES groups can use structured tools for citizen feedback and engage with Union Parishad committees or sector-specific standing committees.

3. Lean Organisational Models with Agile Programming

Lean management principles, when applied to NGOs and public bodies, improve internal efficiency and reduce costs. Key elements include streamlining workflows, minimising duplication, and using adaptive cycles for decision-making.⁴¹

Relevance for PACTA: Downsizing efforts should focus on simplifying reporting, reducing transaction layers, and using lean coordination units at divisional level.

4. Anchoring Anti-Corruption Work in National Legal Frameworks

International good practice affirms that advocacy gains more traction when aligned with existing state commitments. Bangladesh's Right to Information Act, Anti-Corruption

³⁹ Transparency International Bangladesh (2020). Digital Innovations in Land Services: Challenges and Opportunities in Reducing Corruption. TIB Policy Brief 09/2020

⁴⁰ Transparency International & U4 Anti-Corruption Resource Centre (2021). Best practices in devolution and decentralisation programmes that may reduce corruption.

⁴¹ McKinsey & Co. (2012). Transforming government performance through lean management. <https://www.mckinsey.com>

Commission Act, and National Integrity Strategy offer strategic entry points for local monitoring and national reform⁴².

Relevance for PACTA: Advocacy can be framed as supporting compliance with existing state policies, which improves institutional buy-in and reduces political sensitivity.

5. **Using Big Data and AI for Monitoring Service Delivery and Public Procurement**

Globally, big data approaches are being piloted to detect corruption risks, predict inefficiencies, and flag anomalies in procurement or service delivery. In contexts like Colombia and Ukraine, civic tech platforms have uncovered price inflations and contractor collusion⁴³.

Relevance for PACTA: With donor support, TIB could build analytics capacity around health and education service delivery, especially where data is already available (e.g., school inspections, drug inventories).

6. **Multi-Stakeholder Partnerships and Co-Implementation**

Collaborative models involving civil society, academia, sub-national government, and local media improve sustainability and reduce duplication. Joint programming and cost-sharing arrangements also make interventions more resilient⁴⁴.

Relevance for PACTA: Transitioning from fully TIB-led models to co-implementation with regional NGOs, universities, and government actors can ensure continuity and deepen ownership.

7. **Low-Cost Citizen Outreach Through Digital and Hybrid Channels**

High-impact outreach does not always require mass campaigns. In resource-constrained environments, community radio, mobile video units, WhatsApp groups, and animated explainers have proven effective in increasing anti-corruption awareness⁴⁵.

Relevance for PACTA: Digital storytelling, infographics, and online civic education can substitute expensive in-person campaigns while maintaining youth engagement.

⁴² Government of Bangladesh (2012). National Integrity Strategy of Bangladesh: An Initiative of the Government to Fight Corruption and Promote Integrity. Cabinet Division, GoB

⁴³ UNDP (2022). How innovations in anti-corruption can build sustainable development.

⁴⁴ World Bank (2020). Enhancing Government Effectiveness and Transparency: The Fight Against Corruption. Chapter on "Leveraging partnerships for collective action".

⁴⁵ OECD (2018). Behavioural Insights for Public Integrity.

6 Recommendations

6.1 REPOSITION PACTA TO ALIGN WITH DONOR SHIFTS TOWARDS DIGITAL GOVERNANCE, LOCALISATION, AND CLIMATE INTEGRITY

Based on findings that PACTA's core objectives remain aligned with Bangladesh's National Integrity Strategy and the 8th Five Year Plan (Relevance), that coherence with donor trends requires sharper alignment with themes such as digital governance, civic tech, and locally led development (Coherence), and that positioning PACTA as a strategic intermediary—rather than a purely grassroots watchdog—will enhance its long-term visibility and financial sustainability (Sustainability) and exercise.

6.2 DOWNSIZE FROM 45 TO 8 DIVISIONAL CCCS AND TRANSITION FIELD COORDINATION TO REMOTE OR PART-TIME ROLES

Based on findings that maintaining a nationwide CCC structure is no longer viable under current funding (Relevance), that a division-level footprint with focused leadership would ensure more coherent delivery (Coherence), and that a leaner, regionally anchored structure using digital field mobilisers would enable cost-effective operations and future scale-up (Sustainability) and (SWOT Reference) Staff reduction is the fastest but most disruptive downsizing option; however, when paired with a leaner programme strategy and community-driven delivery, it becomes a pragmatic solution to resource constraints while safeguarding core functions.

6.3 FOCUS ON THREE HIGH-YIELD THEMATIC SECTORS AND CONSOLIDATE EFFORTS IN DISTRICTS DEMONSTRATING PROVEN DEMAND AND RESULTS

Based on findings that health, education, and land are the corruption-prone sectors and community uptake (Relevance), that overlapping thematic areas (e.g., integrity, accountability, transparency) currently create fragmentation (Coherence), and that thematic and geographic consolidation will allow better quality control and measurable outcomes under reduced staffing and funding (Sustainability).

6.4 REDESIGN MEL SYSTEM TO PRIORITISE OUTCOME INDICATORS, STREAMLINE REPORTING, AND INTEGRATE PACTAPPDATA

Based on findings that MEL currently lacks outcome tracking, undermining evidence-based decision-making (Relevance), that fragmented reporting systems limit the coherence between

field results and national advocacy (Coherence), and that improving MEL is essential to maintain donor confidence and institutional learning (Sustainability).

6.5 ADOPT A HYBRID IMPLEMENTATION MODEL WITH A SMALL DHAKA HQ, TWO TO THREE REGIONAL HUBS, AND EXPANDED DIGITAL PLATFORMS

Based on findings that fully decentralised or fully centralised models are unsustainable (Relevance), that hybrid models allow coherence between national advocacy and regional implementation (Coherence), and that a combined approach supports programme resilience, reduced costs, continued presence (Sustainability).

6.6 ESTABLISH A RESOURCE MOBILISATION UNIT AND DEVELOP LOCAL FUNDRAISING STRATEGIES INCLUDING CSR, IN-KIND SUPPORT, AND KNOWLEDGE-BASED SERVICES

Based on findings that TIB is over-reliant on a single donor (Relevance), that there is untapped potential in partnerships with private sector, academic institutions, and local philanthropies (Coherence), and that diversification of both core and non-core funding is critical to long-term institutional viability (Sustainability).

6.7 FORMALISE LOCAL OWNERSHIP BY INTEGRATING CCC, ACG, AND YES STRUCTURES INTO GOVERNMENT ACCOUNTABILITY MECHANISMS

Based on findings that CCCs and ACGs enjoy community trust and local legitimacy (Relevance), that their functions often overlap with official social accountability forums like Union Standing Committees (Coherence), and that institutionalisation through MoUs or local policy inclusion would enable sustained impact without continuous donor funding (Sustainability).

Annex 1 Terms of Reference

Reference no.:

13287

Date

2025-05-05

Terms of Reference - Designation of the assignment

1 Background

1.1 Project description

This Terms of Reference outlines the approach and methodology for the Midterm Performance Evaluation of the program Participatory Action Against Corruption: Towards Transparency and Accountability (PACTA) activity. PACTA is a multi-donor funded programme including Swedish, NL, UK, Swiss and formerly USAID funding. Reflecting broader trends in the ODA environment, is likely facing funding cuts in the short term from USAID and UK and may need to adapt to a more limited funding environment. With this context in mind, this evaluation has three objectives:

- To assess the effectiveness, relevance, efficiency, and sustainability of PACTA's interventions, which aim to promote transparency, accountability, and anti-corruption measures within local governance structures in Bangladesh.
- To provide options for operational/ organizational structure and process for downsizing the PACTA program as a result of wider budget cuts, reflecting costs and benefits of different approaches. These options should think through how to sustainably transition the PACTA programme and the work of TIB to a smaller scale, and consider how to achieve impact, prioritise, and maintain quality outputs.
- Provide actionable recommendations for PACTA programming in the coming two years and beyond, taking into consideration the changing funding and donor landscape.

Corruption poses a significant challenge to the effective functioning of local governments in Bangladesh, undermining public trust and limiting access to essential services. PACTA seeks to address these challenges by empowering citizens to actively participate in governance, equipping local government officials with the tools and knowledge to reduce corruption, and utilizing digital platforms to enhance public oversight and service delivery transparency.

Key successes of PACTA to date include the development and adoption of digital tools like PACTApp to improve public access to information and streamline government processes, as well as the establishment of Active Citizen Groups (ACGs) to strengthen community

monitoring. These achievements have contributed to measurable reductions in corruption-related activities and greater accountability in local governance.

However, several challenges persist. Resistance to digital innovations, entrenched corrupt practices, and the need for sustained behavioral changes among both citizens and government officials remain significant barriers to achieving the program's long-term objectives. Additionally, the evolving political landscape presents new opportunities and risks for anti-corruption efforts, necessitating continuous adaptation of PACTA's strategies and interventions.

Goal and Objective of PACTA

The Participatory Action Against Corruption: Towards Transparency and Accountability (PACTA) project is a five-year initiative (2022–2026) implemented by Transparency International Bangladesh (TIB) to strengthen anti-corruption measures and promote governance reforms in Bangladesh. Its overarching goal is to reduce corruption and enhance the integrity of service delivery, contributing to the achievement of the Sustainable Development Goals (SDGs), particularly SDG 16 on peace, justice, and strong institutions.

PACTA's objectives are framed around three core outcomes:

1. **Citizen Empowerment:** This outcome focuses on mobilizing citizens, including marginalized groups such as women, ethnic minorities, and persons with disabilities, to collectively demand and access corruption-free services. Key outputs include the formation and capacity building of Active Citizen Groups (ACGs) to engage in systematic community monitoring using the PACTApp, a digital tool designed to identify and resolve service delivery issues.
2. **Institutional and Policy Reforms:** PACTA aims to reduce corruption within targeted institutions and sectors by influencing reforms in laws, policies, and practices. This involves data-driven advocacy and the development of sector-specific monitoring tools to enhance transparency and accountability in areas such as education, health, land, environment, and construction.
3. **Strengthening the Anti-Corruption Movement:** Through organizational evolution, PACTA seeks to position TIB as a catalyst for national anti-corruption efforts. This includes fostering collaborations with stakeholders, enhancing organizational capacity, and expanding financial resources to sustain and amplify its impact.

By integrating innovative tools like the PACTApp and leveraging a robust Monitoring, Evaluation, and Learning (MEL) system, PACTA provides evidence-based insights to inform governance reforms, engage citizens, and strengthen institutional accountability. These efforts aim to create a virtuous cycle of transparency, responsiveness, and integrity in public service delivery.

PACTA's Structure

The Participatory Action Against Corruption: Towards Transparency and Accountability (PACTA) project is organized into three interconnected components, each with specific sub-components to address corruption and governance challenges effectively.

The **first component** focuses on **citizen empowerment**, emphasizing the mobilization and capacity building of Active Citizen Groups (ACGs), particularly marginalized populations, to demand corruption-free services. This includes sub-components such as ACG formation, training, and the implementation of community monitoring using the PACTApp.

The **second component** centers on **institutional and policy reforms**, targeting the reduction of corruption in key sectors—education, health, land, environment, and construction—through advocacy and operationalizing app-based monitoring tools. Sub-components include the generation of sectoral reports, influencing national policies, and implementing evidence-based advocacy campaigns.

The **third component** aims at **strengthening the anti-corruption movement** by enhancing Transparency International Bangladesh's (TIB) role as a national catalyst. Sub-components here include fostering institutional collaborations and networks, building organizational capacity, and developing sustainable financial resources. Together, these components and their sub-components form a cohesive structure that integrates citizen action, institutional accountability, and policy advocacy to achieve systemic change.

PACTA's Theory of Change

The Participatory Action Against Corruption: Towards Transparency and Accountability (PACTA) project operates on a dynamic, iterative Theory of Change (ToC) designed to create a virtuous cycle of transparency, accountability, and improved service delivery. This ToC integrates community empowerment, systematic data collection, and policy advocacy to drive sustainable anti-corruption outcomes at both grassroots and institutional levels.

At its core, PACTA's ToC is built around three interlinked spheres:

1. **Sphere of Control:** PACTA begins by establishing foundational tools and methodologies, such as the PACTApp, to enable systematic data collection and problem identification by Active Citizen Groups (ACGs). These tools are designed to gather actionable insights from the community level, with a focus on sectors like education, health, land, environment, and construction.
2. **Sphere of Influence:** Using the data and insights generated, ACGs engage with local authorities and service providers to address identified issues. This process of community-driven advocacy and problem-solving creates measurable improvements in service delivery and governance practices, encouraging greater participation from both citizens and institutions.

3. **Sphere of Concern:** As the number of participants and institutions involved increases, the aggregated data and successful interventions become a basis for broader advocacy efforts at the national level. These efforts aim to influence policy reforms, institutional practices, and the overall governance landscape in Bangladesh.

The ToC envisions a continuous feedback loop where the outcomes achieved at each stage inform and enhance the tools, methodologies, and strategies employed in subsequent iterations. This iterative process ensures that PACTA remains adaptive and effective in addressing emerging governance challenges.

By empowering citizens, fostering institutional accountability, and leveraging technology for real-time data collection and monitoring, PACTA's ToC drives systemic change. The ultimate goal is to create a sustainable ecosystem where corruption is minimized, integrity in service delivery is strengthened, and the principles of good governance are embedded across Bangladesh.

The TOC may be framed as follows:

IF PACTA develops robust tools and methodologies (e.g., data collection techniques, survey questionnaires, and the PACTApp), AND IF these are effectively implemented by Active Citizen Groups (ACGs) to identify and resolve governance issues, then small-scale successes will generate actionable data and demonstrate the benefits of participation.

IF this data and demonstrated success attract more users and administrations, expanding PACTA's reach and influence, THEN the program will achieve a critical mass of aggregated data and participants.

IF this critical mass enables systemic improvements in government services and targeted policy changes, THEN the program will achieve broader governance reforms and reduced corruption.

Finally, IF these outcomes are reintegrated into the program's methodologies, THEN PACTA will enhance its tools and approaches, creating a virtuous loop of continuous improvement, increasing participation, and greater institutional support.

Figure 1 PACTA'S Theory of Change

1.2 Current situation in the relevant sector

- Bangladesh experienced a student movement resulting in the departure of the previous government and the installation of an Interim government in August 2024. This government has focussed on reforms and TIB has played a key role in the anti-

corruption reform commission. Civic space has opened⁴⁶ up as a result of the Interim Government context and there has been more space for TIB to comment and vocalise concerns.

- The donor landscape has also transitioned in 2024. There is an expectation that USAID funding to TIB will be cut, and funding cuts globally to other donors in the consortium have also been announced, including by the UK, NL and Switzerland. This means that TIB faces an uncertain funding environment in the future.

2 Scope of assignment

2.1 General information

Evaluation Objectives and LEARNING questions

Evaluation Objective

The PACTA Midterm Evaluation three objectives

- To assess the effectiveness, relevance, efficiency, and sustainability of PACTA's interventions, which aim to promote transparency, accountability, and anti-corruption measures within local governance structures in Bangladesh.
- To provide options for operational/ organizational structure and process for downsizing the PACTA program as a result of wider budget cuts, reflecting costs and benefits of different approaches. These options should think through how to sustainably transition the PACTA programme and the work of TIB to a smaller scale, and consider how to achieve impact, prioritise, and maintain quality outputs.
- Provide actionable recommendations for PACTA programming in the coming two years and beyond, taking into consideration the changing funding and donor landscape.

2.2 Scope of work

Objective 1 To assess the effectiveness, relevance, efficiency, and sustainability of PACTA's interventions, which aim to promote transparency, accountability, and anti-corruption measures within local governance structures in Bangladesh.

Sub-questions

Effectiveness

⁴⁶ Though limits remain and there is a risk that civic space closes up again post elections.

- 1.1 To what extent and how has PACTA triggered change processes and behavioral shifts at institutional, service delivery, and community levels?
- 1.2 How effective are PACTA's approaches to engage stakeholders, including the use of tools like PACTApp, to support community monitoring?
- 1.3 How effective is PACTA's engagement with state institutions, such as the Anti-Corruption Commission and Information Commission, in achieving its objectives?
- 1.4 How effectively is PACTA implementing its gender strategy and fostering the participation and voice of women and disadvantaged groups?
- 1.5 How well does PACTA align with a human rights-based approach?
- 1.6 How effective are PACTA's external communication, research, advocacy, and policy engagement strategies?

Relevance:

- 2.1 How relevant is the work TIB has been doing to the current context?

Effectiveness of Management Structure and Monitoring Systems:

- 3.1 How well is the activity's management structure functioning, and to what extent do the supervisory and steering mechanisms effectively support implementation, oversight, and adaptation?
- 3.2 How well do the activity's logical framework, performance indicators, baseline data, and monitoring systems support performance monitoring and enable evidence-based adjustments to the implementation strategy?
- 3.3 To what extent, and in what ways, has the MEL system contributed to effective activity implementation, decision-making, and learning?

Sustainability:

- 4.1 How effectively have the anti-corruption outcomes of PACTA been institutionalized within local governance systems?
- 4.2 What has the project learned from efforts to sustain positive change, including strategies for replication, scaling, and local ownership?
 - **Objective 2:** To provide options for operational/ organizational structure and process for downsizing the PACTA program as a result of wider budget cuts, reflecting costs and benefits of different approaches. These options should think through how to sustainably transition the PACTA programme and the work of TIB to a smaller scale, and consider how to achieve impact, prioritise, and maintain quality outputs.

Provide three options for how to scale down work of TIB based on discussions with TIB leadership team. These options should consider

- **Costs and benefits of each approach**

- **Geographic scope of work**
- **Thematic scope of work**
- **Methods of working (e.g. transitioning online, usage of physical work spaces)**
- **Areas of work that have most impact and lesser impact**
- **Areas of work that may continue without donor support and those areas that would not be able to continue without donor support**

Objective 3: Provide actionable recommendations for PACTA programming in the coming two years and beyond, taking into consideration the changing funding and donor landscape

Based on the options outlined under objective two provide actional steps to implement recommendations.

Geographic Coverage

The geographic coverage of the PACTA Midterm Evaluation encompasses areas where the activity has been actively implemented, focusing on regions with significant anti-corruption activities and local governance interventions. The evaluation will include districts and administrative units where Active Citizen Groups (ACGs) are operational and have utilized tools such as the PACTApp to identify and resolve governance issues.

PACTA operates across 45 Citizen Charter Committees (CCCs) strategically distributed throughout Bangladesh, covering a diverse range of geographic, socio-economic, and governance contexts. These CCCs are situated in urban, peri-urban, and rural areas across eight divisions, including Dhaka, Chattogram, Sylhet, Khulna, Rangpur, Mymensingh and Barishal, and Rajshah. The locations reflect a mix of metropolitan hubs, such as Dhaka and Chattogram, where governance challenges are influenced by rapid urbanization, and more rural and marginalized areas like Dinajpur and Rangpur, where service delivery and citizen engagement issues are often exacerbated by limited infrastructure and resources. The project also targets regions with distinct socio-economic profiles, such as Sylhet, known for its remittance-driven economy, and Khulna, characterized by its proximity to coastal zones and climate-related governance challenges. This extensive geographic coverage ensures that PACTA addresses governance and corruption issues across a broad spectrum of local contexts, engaging citizens in diverse settings to strengthen accountability and transparency in service delivery.

The sampling strategy for the PACTA evaluation is designed to achieve a representative and comprehensive understanding of the project's impact while accounting for logistical and resource constraints. The strategy prioritizes geographic diversity and stakeholder representation across the 45 CCC locations, ensuring inclusion of urban, peri-urban, and rural areas. To maximize efficiency and coverage, data collection focuses on a selected number of districts and upazilas, chosen based on criteria such as the presence of active CCCs, variation in governance contexts, and the inclusion of marginalized groups. State clearly all the details that are required of the tenderer. Where possible, indicate the specific goals for each interim

assignment, e.g. key activities for achieving the goals and the anticipated result for each assignment. Specify clearly if the assignment forms part of a larger project.

2.3 Budget

This is a ranked call-off, therefore the maximum budget value is 500 000 SEK. The Supplier shall submit a call-off response, including a ceiling budget broken down into fees and reimbursable expenses.

2.4 Schedule

June 1 - July 15, 2025

The MTE is expected to be completed, including recruiting, development of the Inception Report, field work, data processing and analysis, and preparation of the draft and final report, between June 1 and July 31, 2025.

[3 Conditions and risks - if applicable]

3.1. General conditions

Field work in-country requires language proficiency in Bangla.

Annex 2 List of Consulted and Interviewed Stakeholders

Government Institutions

The individuals from key government institutions were consulted to provide insight and expertise relevant to the project:

1. Justice, and Parliamentary Affairs
2. Anti-Corruption Commission
3. Commissioner for Land, Madhupur
4. SACMO-Kuragacha Union Family Welfare Center
5. Upazila Primary Education Officer
6. Monogram Government Primary School
7. Upazila Health and Family Planning Officer

Board of Trustees, Transparency International Bangladesh

Valuable guidance was received from the Board of Trustees of Transparency International Bangladesh, which includes experienced professionals and human rights advocates

Transparency International Bangladesh (TIB)

Consultations were held with the executive management team and key personnel of Transparency International Bangladesh, representing a range of expertise in finance, administration, civic engagement, outreach, communication, research, and policy

ACG, CCC, YES – Cumilla

Stakeholders from the Anti-Corruption Groups (ACG), Committees of Concerned Citizens (CCC), and Youth Engagement and Support (YES) in Cumilla contributed their perspectives.

ACG, CCC, YES – Madhupur

Engagement also included stakeholders from the Madhupur chapters of ACG, CCC, and YES.

ACG, CCC, YES – Rangpur

Representatives from Rangpur's ACG, CCC, and YES contributed to the consultations

ACG, CCC, YES – Nilphamari

National Journalists

National-level journalists recognized for their investigative work and contributions to anti-corruption efforts were also consulted

Donors, external consultants and Development partners

Evaluation Manager, Sida

Swiss Development Cooperation

First Secretary Political Affairs, Embassy of the Kingdom of the Netherlands

FCDO

International expert

Annex 3 Documents Consulted

Country reports and studies:

Asian Development Bank. (2013). *Cost-benefit analysis for development: A practical guide*. Asian Development Bank. <https://www.adb.org/documents/cost-benefit-analysis-development-practical-guide>

Datta, D. K., Basuil, D. A., & Radeva, E. A. (2014). Employee downsizing and organizational performance. In C. L. Cooper, A. Pandey, & J. C. Quick (Eds.), *Downsizing: Is less still more?* (pp. 199–227). Cambridge University Press. <https://doi.org/10.1017/CBO9780511791574.012>

Datta, D. K., Guthrie, J. P., Basuil, D., & Pandey, A. (2010). Causes and effects of employee downsizing: A review and synthesis. *Journal of Management*, 36(1), 281–348. <https://doi.org/10.1177/0149206309346735>

Harvard Business School. (2019). *What is cost-benefit analysis? 4-step process*. Harvard Business School Online. <https://online.hbs.edu/blog/post/cost-benefit-analysis>

Ifeoma, A. R., & Patience, N. C. (2021). Downsizing: Causes, effect, and strategies: A conceptual approach. *International Journal of Social Science and Social Research*, 4(7), 1799–1804. <https://doi.org/10.47191/ijsshr/v4-i7-32>

Johansson, P.-O., & Kriström, B. (2016). *Cost-benefit analysis for project appraisal*. Cambridge University Press. <https://doi.org/10.1017/CBO9781107548220>

Sulaiman, M., & Misha, F. (2016). *Comparative cost-benefit analysis of programs for the ultra-poor in Bangladesh*. Copenhagen Consensus Center. https://copenhagenconsensus.com/sites/default/files/sulaiman_misha_ultrapoor.pdf

United Nations Sustainable Development Group. (2016). Common premises cost-benefit analysis user manual. UNSDG. <https://unsdg.un.org/resources/common-premises-cost-benefit-analysis-user-manualhttps://unsdg.un.org/resources/common-premises-cost-benefit-analysis-user-manual>

Project documents:

1. PACTA Project Proposal
2. MTR Report BIBEC
3. Annual Report 2023-2024. TIB.

4. Monitoring, Evaluation and Learning (MEL) Plan
5. Governance Manual
6. Gender Policy
7. Safeguarding Policy
8. Data Protection Policy
9. Fundraising Policy and Guidelines
10. Gender Analysis
11. Core Actors manual and operational guidelines
12. Code of Ethics
13. Policy on Human Rights-Based Approach (HRBA)
14. Policy on Sexual Harassment Complaint & Redress
15. Case Study 1: Impact of the Policy Brief on ‘New Bangladesh’: TIB’s Recommendations on Anti-Corruption, Democracy and Good Governance
16. Case Study 2: TIB's Continuous Research and Advocacy for Banking Sector Reforms in Bangladesh
17. Case Study 3: Impact of Study on “Accessing Green Climate Fund (GCF) for Vulnerable Countries like Bangladesh: Governance Challenges and Way Forward”.



Midterm Performance Evaluation of the Program Participatory Action against Corruption: Towards Transparency and Accountability

Purpose and use

This mid-term evaluation of the PACTA programme implemented by Transparency International Bangladesh assesses relevance, effectiveness, efficiency, sustainability, and explores options for downsizing/repositioning under funding constraints. It is intended for Sida, SDC, FCDO, the Netherlands, TIB and partners to inform decisions on future programming and a viable, cost-effective model.

Conclusion

PACTA strengthened citizen-led accountability via CCC, ACG and YES structures and digital tools, aligning with national frameworks and prompting administrative responses. However,

MEL remains output-focused and financial shortfalls require consolidation. Of the options analysed, programme redesign is the most balanced; systemic change offers longer-term sustainability but needs greater resources.

Recommendation

Prioritise core functions and key sectors (health, education, land); adopt a hybrid model with a small Dhaka HQ, 2–3 regional hubs, and expanded digital tools; reduce CCCs to divisional hubs; strengthen MEL with outcome indicators and full PACTApp integration; diversify funding via a mobilisation unit, CSR, and local partners; and formalise local ownership through MoUs.

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