2012:2

Joint Evaluation

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Joint Evaluation of Support to Anti-Corruption Efforts
Bangladesh Country Report

Sida

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The views and interpretations expressed in this report are the authors' and do not necessarily reflect those of the Norwegian Agency for Development Cooperation – NORAD, the United Kingdom Department for International Development – DFID, the Asian Development Bank – ADB, the Swedish Agency for Development Evaluation – Sadev, the Swedish International Development Cooperation Agency – Sida and the Ministry of Foreign Affairs of Denmark – Danida .

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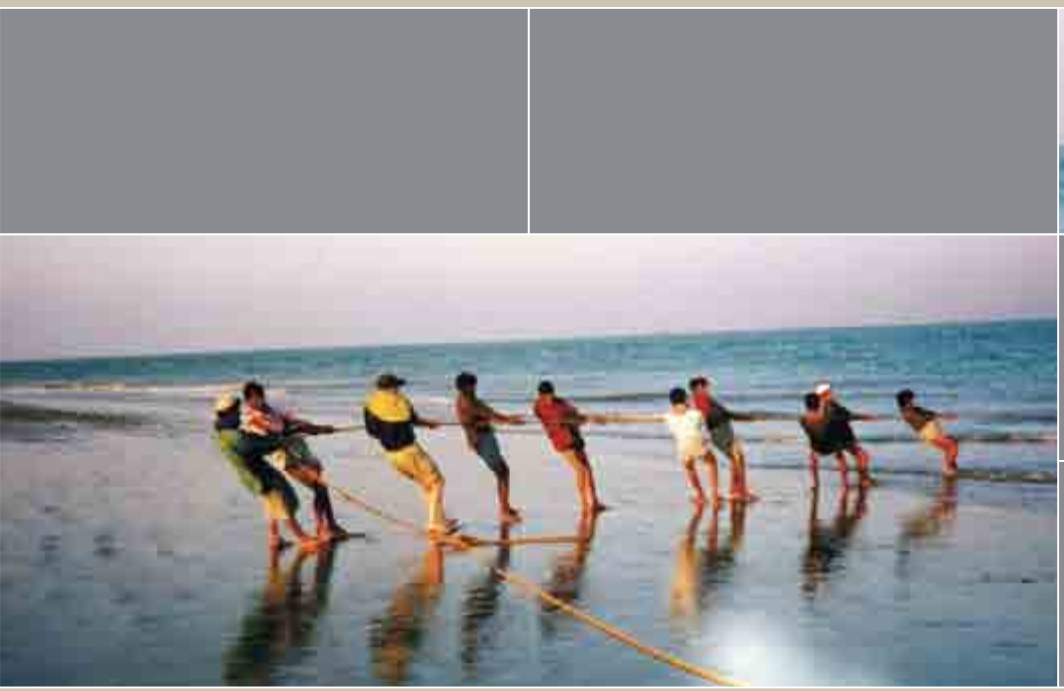

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Joint Evaluation of Support to Anti-Corruption Efforts

Bangladesh Country Report

June 2011

Submitted by
ITAD
in association with
LDP

Responsibility for the contents and presentation of findings and recommendations rest with the evaluation team.
The views and opinions expressed in the report do not necessarily correspond with those of Norad.

Preface

Donor agencies have increasingly included the fight against corruption in their overall governance agenda. In preparation for this evaluation, a literature review[1] was undertaken which showed that our support for anti-corruption work has sometimes had disappointing results.

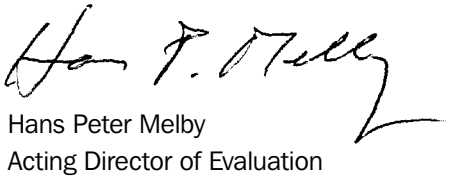
Has the donors' approach to anti-corruption work been adapted to circumstances in the countries? What are the results of support for combating different types of corruption, including forms that affect poor people and women in particular? These were some of the overarching questions that this evaluation sought to answer.

The evaluation provides insights for the debate, drawing on recent evidence from five countries. The main conclusions and recommendations are presented in the synthesis report. In addition, separate reports have been prepared for each of the case countries Bangladesh, Nicaragua, Tanzania, Viet Nam and Zambia.

The evaluation was managed by the Evaluation Department of the Norwegian Agency for Development Cooperation (Norad) and commissioned by this agency together with the Asian Development Bank (ADB), the Danish International Development Assistance (Danida), the Swedish Agency for Development Evaluation (SADEV), the Swedish International Development Co-operation Agency (Sida) and the UK Department for International Development (DFID).

The evaluation was carried out by consultants lead by the consultancy company ITAD. This company is responsible for the content of the reports, including the findings, conclusions and recommendations.

September, 2011



Hans Peter Melby
Acting Director of Evaluation

1 Anti-Corruption Approaches. A Literature Review. Study 2/2008. www.norad.no/evaluering

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The evaluation team would like to thank the many people who contributed their time and insights to this evaluation. They include headquarters and country office staff of the five commissioning donors present in Bangladesh, government officials, representatives of donor agencies and civil society organisations. Special thanks are due to the Country Director and staff of the ADB Bangladesh Resident Mission for assisting with the arrangements for the evaluation visit. The evaluation represents the combined effort of a team including consultants who participated in the country visits and support staff at ITAD.

Full responsibility for the text of this report rests with the authors. We have attempted to record and interpret the information from various sources up to our best capacity and without any bias within the constraints arising from the arrangements for the country visits. The views contained in this report do not necessarily represent those of the commissioning donors or of the people consulted.

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List of abbreviations and acronyms

AC	Anti-Corruption
ACC	Anti-Corruption Commission
ADB	Asian Development Bank
BLAST	Bangladesh Legal Aid Services Trust
C&AG	Comptroller and Auditor General
CCC	Committee of Concerned Citizens
CPI	Corruption Perceptions Index
CSO	Civil Society Organisation
Danida	Danish International Development Assistance
DFID	Department for International Development
EC	European Commission
FAPAD	Foreign Aided Project Audit Directorate
FMRP	Financial Management Reform Programme
GGP	Good Governance Programme
GoB	Government of Bangladesh
GTZ	Deutsche Gesellschaft für Technische Zusammenarbeit
IGS	Institute of Governance Studies
JARM	Joint Annual Review Mission
LCG	Local Consultative Group
M&E	Monitoring and Evaluation
MaTT	Managing at The Top
MOPME	Ministry of Primary and Mass Education
NGO	Non-Governmental Organisation
Norad	Norwegian Agency for Development Cooperation
NIS	National Integrity System
NSAPR	National Strategy for Accelerated Poverty Reduction
PAC	Public Accounts Committee
PARC	Public Administration Reform Commission
PEDP	Primary Education Development Program
PERP	Preparation of Electoral Roll with Photographs
PFM	Public Financial Management
PFMRP	Public Financial Management Reform Programme
PSC	Public Service Commission
RIRA	Reforms in Revenue Administration
RISE	Regulatory and Investment Systems for Enterprise
SADEV	Swedish Agency for Development Evaluation
TA	Technical Assistance
TI	Transparency International

TIB	Transparency International Bangladesh
UK	United Kingdom
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
WBI	World Bank Institute

Executive Summary

Executive summary

Introduction

S1 This evaluation is concerned with support to anti-corruption (AC)-related programmes over the period 2002-10 by the Asian Development Bank (ADB), Denmark, Norway, Sweden and the United Kingdom (UK). It was produced on the basis of documentation review, interviews with stakeholders at the headquarters of the donors and in Dhaka, and a field visit to Sirajganj district. The visit to Bangladesh took place in November 2009.

The context in Bangladesh

S2 Bangladesh was ranked by Transparency International (TI) as among the most corrupt countries in the world in the first half of the evaluation period. The World Bank Institute's Control of Corruption Indicator also confirms that Bangladesh is positioned among the most corrupt countries in the world, with sharp increases in corruption between 1996 and 2004. The country's standing has since improved, mostly as a result of the caretaker government's pledge to fight corruption in 2007-08. During this period, the Anti-Corruption Commission (ACC) was revitalised, the United Nations Convention against Corruption (UNCAC) was ratified and legislative reforms were pursued.

S3 Progress in the fight against corruption has slowed down under the incumbent elected government and donors have questioned its commitment to reforms. Strong vested interests in maintaining the status quo largely explain the lack of progress. The politicisation of public administration – combined with low salaries, low morale, and the absence of appropriate, credible and/or effective rules and regulations – has served to institutionalise corruption in public services further.

S4 Corruption in Bangladesh is endemic and systemic. It affects all aspects of daily life and has become a feature of 'how things are done' for many private businesses, politicians, government officials and non-governmental organisations (NGOs). Furthermore, it has permeated many institutions that have a role to play in the fight against corruption, including the police and judiciary. On a more positive note, the issues of corruption are now discussed more openly in the country than in previous decades, with the media raising cases of corruption almost on a daily basis.

S5 Importantly, macroeconomic stability, private sector-led growth, new technologies and the contribution of NGOs to basic service delivery seem to have offset failures in governance, including corruption, with Bangladesh recording a continuous

decline in income poverty and improvement in social indicators over the evaluation period.

Relevance of donor programmes

S6 Donors have all closely aligned their strategy of engagement to national strategies and have responded to the government of Bangladesh (GoB) plans for reforms to structure their governance and poverty reduction programmes. Even though donors anticipated the possibility of a slow-down in political commitment to AC after the 2008 election, all responded positively to the caretaker government's AC pledge.

S7 Donor approaches to AC encompass: helping the government set up institutions that deal directly with corruption; supporting essential governance reforms from public financial management (PFM) to the justice sector; mainstreaming the fight against corruption to support social sectors; and ensuring that donors' own money is not misused. Significant levels of support have been given across policy areas covered by the seven UNCAC articles dealing with the prevention of corruption.

S8 Over twenty projects were reviewed, revealing significant differences in the level and scope of donor interventions, with the largest single programme being the ADB Good Governance Programme (GGP), 2007-12. Significant support has been given to demand-side activities. By contrast, only Denmark and the ADB supported the ACC whereas the UK Department for International Development (DFID) has a long-term engagement in PFM and has, in more recent years, provided support to civil service reforms and the police. The strong AC commitment of the interim caretaker government created a valuable opportunity for donors to support political processes.

S9 The links between specific donor programmes and how they contribute to the fight against corruption are not always explicit. Although donor analysis is often strong, little is said about gender and poverty issues in relation to AC activities. Background analysis is not always reflected in their programmes' content and only a few donor programmes, including notably GGP and support to the police, make reducing corruption a specific objective. Special emphasis on the gender issue was noted in donor support to ACC, Transparency International Bangladesh (TIB) and the police.

Donor ways of working

S10 Arrangements for monitoring and evaluation (M&E) show that whilst measures of improving governance are extensive, dedicated indicators of change in corruption are few. The nearest most donors come to measuring change is by the proxy of looking at GoB policy actions.

S11 As well as monitoring results, donors have established formal procedures for routine programmatic and financial reporting. These procedures have been largely followed and in some occasions allowed donors to detect and respond to specific cases of corruption during programme implementation – with funds being stopped

in the past for both state and non-state actors. Donors, however, recognise that these safeguard measures are not always sufficient.

S12 The 2008 Survey for Monitoring the Paris Declaration confirms both a moderate donor alignment to country systems in Bangladesh and important differences in the way donors work – both in their level of support to government and in their alignment to the country's PFM and procurement systems.

S13 Coordination between the donors in governance and AC areas has been patchy, though not non-existent. The lack of an effective platform is explained by the contrasting scale and modality of donor engagement; weak government ownership and leadership; the lack of a national AC policy and vision; and lack of joint programming. The generally unstable political situation has also had an impact on donors' ability to pursue a high-level dialogue with the government.

Effectiveness of selected programmes

S14 The **ACC**, formed in 2004, lacked capacity until increased attention during the period of the caretaker government encouraged optimism that the ACC would be an effective instrument. A loss of pace under the current government and concerns about the robustness of some of the prosecutions started under the caretaker government have since set back progress. One area of high potential was the development of local level committees (Duprak) which offered scope to tackle corruption affecting the poorest and most vulnerable people. These too have stalled.

S15 Since independence, progress in **civil service reforms** has been slow. Numerous reform committees and commissions have been established under successive governments. Donor support to the Public Service Commission (PSC) recruitment system has allowed small positive steps to take place but overall, very little has been achieved. DFID's ambitious training programme to promote changes within the Bangladesh civil service has failed to meet its objectives because of slow progress in human resource management reforms, which are also a component of the programme.

S16 The **justice system** has suffered from political and executive interference, corruption, low capacity and quality, and lack of oversight. Although the constitution explicitly provides for an impartial and independent judiciary,[2] separation of the judiciary from the executive has only recently begun. ADB support has suffered from a lack of sustained political commitment, but donor support for the civil society organisation (CSO) programme and the Bangladesh Legal Aid Services Trust (BLAST) has shown some results.

S17 The **Bangladesh police** is under-resourced, lacks capacity and is still based on a pre-independence public-order model. The Police Reform Programme is achieving its planned outputs to some extent, but without government commitment to supporting legislation and regulations, the planned purpose to develop a safer

2 *The Constitution of the People's Republic of Bangladesh*. 1972. This provides for the separation of the judiciary from the executive. Chapter 1 establishes a judicial system in which the subordinate courts are accountable to the Supreme Court and not to the executive.

and more secure environment based on respect for human rights and equitable access to justice through policing will not be achieved. The impact of the programme on reducing corruption in Bangladesh is difficult to judge.

S18 There has been support for **election** monitoring since the mid-1990s. The period of the caretaker government enabled a lengthier and more substantive engagement that strengthened the election commission and created a viable and modern voter role. Reports document effective performance and their acceptance by contending parties plus the benefits of the inclusion of women, the poor, physically disabled and ethnic minorities.

S19 CSOs have been supported to mobilise the **public** to demand greater transparency, accountability and effective service delivery. TIB has a clear agenda, sector prioritisation and grasp of the results chain. Work is grounded at local level. It has helped build awareness and motivated actions to reduce corruption. Institutionalised research and use of tools such as report cards, complaints systems, 'face the people' and open budgets, have strengthened the evidence base. The innovative use of media and opening parliament to scrutiny has helped change peoples' awareness.

Tackling corruption in the primary education sector

S20 The evaluation looked at experience with **primary education** as an example of a sector programme not specifically directed towards AC. Corruption affects the funding of school programmes, investments in schools and access to education. Overall, there is good evidence of progress being made. Donors have exhibited persistence, solidarity and coordinated, resolute action. Change has come about through a combination of factors:

- comprehensive analysis that enabled a well-informed dialogue
- decentralisation of decision-making to lower levels of government, the involvement of parents in school management and transparency of decision-making
- strong arrangements for independent audit and a united response by donors to early problems
- donor supervision of the project being organised through a joint annual review mechanism (JARM) in a single forum.

Conclusion

S21 The main conclusion of this evaluation is that there no proven ways to promote AC efforts in a country like Bangladesh. Notwithstanding a long-term engagement and responsive approach to opportunities, donors have had mixed success in demonstrating tangible results in their support to AC.

S22 The evaluation has found a high degree of relevance in the donor-supported programmes. They are generally well founded on analysis of political economy and corruption, athough analysis of how AC activities will support poverty reduction and attention to gender dimensions is less consistent.

S23 All donors have been highly responsive in their discourse to changing government strategy and political will to fight corruption. ADB's GGP is the most relevant

and coherent AC programme. UNCAC ratification helped shape the programme whereas other projects have scope to create stronger links to UNCAC articles in their design, goals and objectives.

S24 The main areas of success have included supporting improvements to the legal framework and in helping to build key institutions that have a role to play in the fight against corruption.

S25 There are also ample examples of CSOs achieving some success through their work at the grass root level in reducing poverty and exposure to corrupt practices.

S26 This evaluation shows that donors can only go so far in their support to institutions and processes. It confirms that lasting achievements do not happen without strong political support, which in turn raises real issues of impact and sustainability. Furthermore, a generally unstable political situation has meant that some donor programmes have often not been given time to take root and have been slow to effect change. At the same time, donors could still do more to support the fight against corruption. Their lack of a coordinated and tailored approach to AC activities in the country, weak project design, and poor mainstreaming of corruption indicators are all factors that have contributed to reducing the effectiveness of their interventions.

Lessons

S27 Chapter 9 draws together some lessons developed by the evaluators and summarises from the limited evidence available what approaches appear to have had some success.

S28 Understanding of the political economy is important to appreciate underlying factors affecting corruption. In the case of Bangladesh, the scope for change is greatest where it does not affect the patronage system. Progress has been made for example, with people's participation, including direct efforts to assess public services and indirect efforts in working to increase the participation of parents in school management. In contrast, support for civil service reform has seen less success, with clear resistance to change by the Ministry of Establishments.

S29 There are limitations to change that can be leveraged from a technical intervention, such as improving the quality of audit. There is scope for progress as patronage is not directly affected. But the findings from audit reports can give rise to information that can be used to challenge patronage. Donors need to consider if and how they can help create an environment in which the benefits from improving technical performance are not lost.

S30 The experience of the period of caretaker government highlights the risk to donors of responding too enthusiastically to a conducive political environment.

S31 The use of a Development Policy Loan as the aid modality for the ADB GGP clearly has the potential to bring efficiencies in the flow and management of funds. But it may not be the best mechanism for a complex governance programme.

S32 The good work that has been done with donor support is often not recognised because interventions lack a clear logic with measurable objectives and insufficent investment is given to establishing baseline parameters and indicators.

What works and why?

S33 Clear benefits can be seen to have arisen from support to people's participation, both through direct action to increase public demand for accountability through TIB and in the context of managing resources at primary schools.

S34 Support to PFM through audit reforms shows that performance can be improved in technical standards. But for better auditing to change government practice requires audit reports to be acted upon and here success was mixed.

S35 Electoral support illustrates the importance of long-term commitment and the ability to seize an opportunity. The success of support shows that strong leadership and coordinated donor support at a time of consistent government policy can be effective in pushing through important reforms.

S36 Reforms that affect the operational practice of the police have demonstrated that change can be managed and effective. Donors have been less effective at influencing government to improve modernisation of laws and regulations.

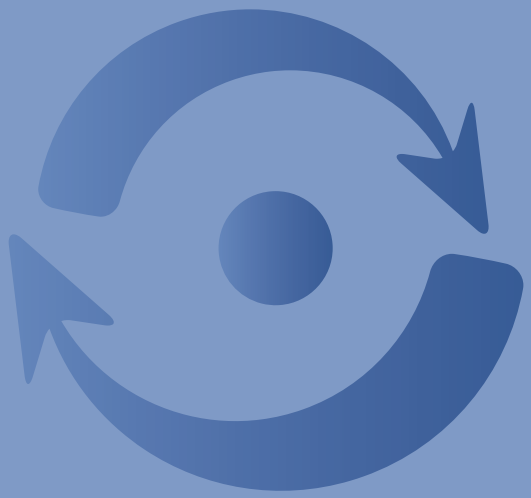
Recommendations

S37 A small number of recommendations are presented in Chapter 10. Broader recommendations will be made as part of the synthesis report after the evaluations are completed in all five counties (Bangladesh, Nicaragua, Tanzania, Viet Nam and Zambia).

S38 Overall, donors should aim to:

- Make sure that fiduciary risks are managed and that their money is well spent. This sets a strong example and should remain as a donor main priority.
- Explicitly state AC objectives in project designs accompanied by corruption indicators.
- Mitigate the risk of political interference within key AC institutions by working with agents of change concerned about accountability, from civil society to parliament.
- Prioritise project components that aim at building institutional linkages between key institutions.
- Follow a tough, yet non-confrontational stance on governance reforms.
- Balance an opportunistic approach with agreement on a joint long-term strategy to support governments' actions against corruption to guide it.
- Speak with a unified voice and provide a consistent message.
- Target gender issues and the needs of poorer people more explicitly.
- Make stronger use of, and focus on, public opinion.

Main Report



1. Introduction

Background

1.1. Corruption undermines democratic values and institutions, weakens efforts to promote gender equality, and hampers economic and social development. In recent years, donor agencies have increasingly made the fight against corruption part of their larger governance agenda.

1.2. Five development partners: the Asian Development Bank, the Danish International Development Assistance (Danida), the Swedish International Development Cooperation Agency (Sida), the UK Department for International Development (DFID), and the Norwegian Agency for Development Cooperation (Norad, lead agency), together with the Swedish Agency for Development Evaluation (SADEV) have commissioned a joint evaluation of anti-corruption (AC) efforts over the period 2002-09.

1.3. The evaluation took place during 2009 and 2010, with case study fieldwork in Bangladesh, Nicaragua, Tanzania, Viet Nam and Zambia.

1.4. The commissioning donors claim to have paid considerable attention to AC in their development cooperation in recent years. Given that levels of corruption remain high in many countries, they wish to find out how support in this area can become more effective. They are the primary audience for the evaluation. Secondary audiences include interested parties in the case countries (national authorities, civil society and others), other countries and donor organisations. The purpose and objectives of the evaluation (as defined in the terms of reference) are presented in Box 1.1.

Box 1.1 Purpose and objectives of the evaluation

Purpose
The purpose is to obtain knowledge regarding the relevance and effectiveness of support to reduce corruption, both through specific AC efforts and in other programmes – in order to identify lessons learned regarding what kind of donor support may work (for poor people and women in particular), what is less likely to work and what may harm national efforts against corruption.

Objectives
The objectives are to obtain descriptive and analytic information related to actual results of the support provided by the five commissioning donors, both overall and for each of them individually in each of the selected countries, regarding:

- corruption diagnostic work (highlighting, where relevant, information disaggregated by gender)
- underlying theory, AC strategy and expected results of their support to reduce corruption
- the implementation of support to specific AC interventions and achieved results
- other donor interventions or behaviour relevant for corruption and AC efforts, and achieved results in terms of corruption
- the extent of coherence of AC practice between specific AC activities and other programmes, for individual donors
- the extent of coherence of AC practice within the donor group
- the extent that gender and other forms of social exclusion have been taken into account in donor interventions.

The report

1.5. This evaluation is concerned with support to anti-corruption (AC)-related programmes over the period 2002-10 by the Asian Development Bank (ADB), Denmark, Norway, Sweden and the United Kingdom (UK). It was produced on the basis of documentation review, interviews with stakeholders at the headquarters of the donors and in Dhaka, and a field visit to Sirajganj district. The visit to Bangladesh took place in November 2009. The mission consisted of Derek Poate, Charlotte Vaillant, Deborah Mansfield, Mozammel Hoque and Zarina Rahman Khan. Imran Ahmad joined the team from 15 November 2009.

1.6. **Methodology** Full details of the methodology for the evaluation are contained in an Inception Report. Information about this and further details about methodology can be found in the Synthesis Report for this evaluation.[3] The Asian Development Bank facilitated arrangements for the country visit. Details specific to the Bangladesh visit are set out in Chapter 2, with supporting material in annexes. The country evaluation is neither a primary evaluation in which original data are collected, nor a 'meta-evaluation' (in which findings from primary evaluation studies are synthesised). The approach was based on a review of available secondary data including evaluation reports and extensive interviews with a range of stakeholders, including donor country staff (past and present), government officials, non-governmental organisations (NGOs) and consultants. A list of persons consulted is given in Annex 3 and of documents in Annex 4.

3 ITAD Ltd in association with LDP. 2011. *Joint External Evaluation of Anti-Corruption, Synthesis Report.*

1.7. **Limitations** This visit was the first of the five countries and as such was subject to some testing of data collection approaches, described in Chapter 2. Few preparations at country level were completed before the consultant's team arrived which resulted in some delays while documents were assembled and appointments organised with senior officials, though the team did manage to meet most of the stakeholders they wished to. A visit was made to government and NGO programmes in one district outside Dhaka and the findings have been used to inform the evaluation but are not reported separately.

1.8. **Report Structure** The report is structured as follows: Chapter 2 describes the methodology used. Chapter 3 then looks at the country context for Bangladesh over the period. This leads to a review of the relevance of donor AC programmes in Chapter 4, where the programmes are examined against the United Nations Convention against Corruption (UNCAC), together with national needs and donor policies. In so far as documented evidence is available or the views of informants can be triangulated, the contribution of these different interventions to broader strategy objectives and key policy themes are also addressed. Chapter 5 looks at how donors have managed their programmes with specific reference to M&E, coordination and alignment with national strategies. In Chapter 6, evidence about the results of the programmes is reviewed with more detailed attention to a number of specific themes. Chapter 7 examines ways in which donors have tackled problems of corruption in the primary education sector and lessons are drawn from that experience. That leads into Chapter 8 where conclusions are identified, followed by broader lessons in Chapter 9 and some recommendations to the commissioning donors in Chapter 10.

2. Methodology and analytical framework

Methodology

2.1. The approach to the evaluation is characterised by: use of an evaluation framework to set out the questions to be answered; mapping of projects against the categories used by UNCAC; analysis of projects to understand their intervention logic and evidence of effectiveness; and data collection tools for document review and interviews with key informants. The details are summarised here.

2.2. The definition of corruption used in the evaluation is *"the abuse of entrusted authority for illicit gain".* The questions in the terms of reference have been rationalised and simplified into an evaluation framework that is reproduced in Annex 1. This provides a working structure for all analysis of documents and interviews with key respondents. In accordance with the requirements of the terms of reference, the framework deals only with the evaluation criteria of relevance and effectiveness.

2.3. In order to structure the diverse range of projects supported by the five donors, we use the categories in UNCAC as an organising framework. This has enabled the evaluators to understand the scope of coverage of the projects and identify any significant gaps in efforts to tackle corruption.

2.4. Individual donor projects and programmes are the units of study under the evaluation.[4] In order to investigate their relevance and effectiveness we have examined the intervention logic of each project and reviewed the statements of objectives and indicators.

2.5. Understanding the intervention logic is essential if stakeholders are to agree on the purpose and measurement of performance within a programme. We have investigated the intervention logic in two ways: as part of the document review; and in discussion with informants.

2.6. We have described the way in which we have selected and reviewed projects as a 'table-top approach'. This means we have made a broad but 'thin' or 'light' evaluation of all donor programmes in all five countries (the 'table top'), and then chosen major programmes or sectors to examine at greater depth (the 'table legs'). In practice, owing to the 'clustering' of projects around common themes, few projects were left on the table top.

4 For simplicity, the words 'project' and 'programme' are used interchangeably, with 'project' being the default term for donor-supported interventions.

2.7. Progress was made towards the table top prior to the country visit with 1) a comprehensive overview of the contextual and situational analysis in each country, and 2) a review of all donor programmes in each country. These were updated and extended during the visit itself as more details became available to the team.

2.8. In addition to evaluating some major programmes, in accordance with the terms of reference, one other sector not dealing specifically with AC was included for analysis. After discussion with the commissioning donors, the primary education sector was chosen for Bangladesh.

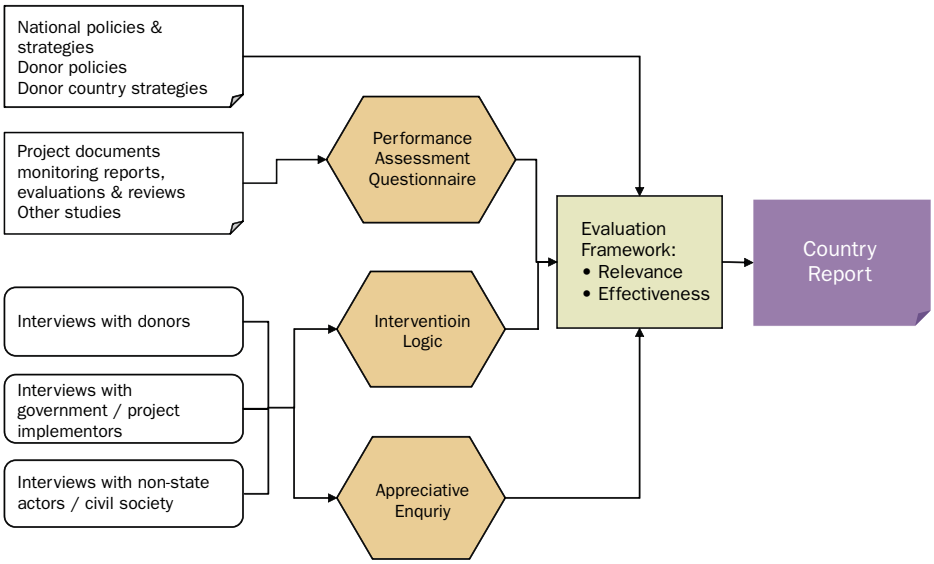
Data collection tools

2.9. A number of conventional data collection tools were adapted for the specific requirements of this evaluation. First is the programme **performance assessment questionnaire**. This is a document review questionnaire that examines the logic and consistency of the project design, the nature of indicators and monitoring and evaluation (M&E). Results are cross-checked during interviews before the findings are finalised. An example of a completed form is in Annex 1.

2.10. Next are **interview topic lists**. These are used to ensure that interviews with respondents follow the issues as set out in the evaluation framework and are structured consistently by all members of the evaluation team (Annex 1).

2.11. In addition, two participatory exercises were developed for use in group meetings: a card-sorting approach to stimulate discussion about how **interventions** are intended (in the understanding of stakeholders) to bring about change and the nature of that change; and the qualitative discussion tool of 'Appreciative Enquiry' to learn from positive experience and develop lessons about what kind of donor support may work and what is less likely to work. Examples of their use are in Annex 7. Figure 2.1 illustrates how these tools combine to support the country report.

Figure 2.1: Joint external evaluation of anti-corruption – data collection flowchart



Application of the approach in Bangladesh

Donor mapping against UN Convention against Corruption

2.12. Annex 5 contains a full presentation of project mapping. The projects were identified from three sources:

- scrutiny of donor websites and published lists of projects
- review of donor country strategy documents and, where available, progress reports against those strategies
- cross-checking with donor staff in Bangladesh.

2.13. In reviewing the projects we found that a significant number of projects are supported by more than one donor; many projects are follow-on support for which titles and specific objectives may change from phase to phase but the central features are unchanged; and that many projects contribute to more than one of the UNCAC categories, especially under the broad area of prevention.

2.14. Table 2.1 lists the final selection of projects for each of our 'table legs', which were predefined as follows: support to the Anti-Corruption Commission (ACC); civil service reforms; justice and police; elections; and participation of society. In addition, because of the centrality of the issue and success in securing interviews with key informants, including notably Comptroller and Auditor General (C&AG) and their Foreign Aided Project Audit Directorate (FAPAD), public financial management (PFM) became an additional table leg or theme in our report.

Table 2.1: Selection of projects for in-depth study

Table legs/UNCAC	Projects
Support to ACC/ UNCAC Articles 5 and 6	**ADB and Denmark** Good Governance Programme (GGP)-ACC and National Integrity System (NIS)
Civil service reforms/ UNCAC Article 7	**ADB** GGP-Public Service Commission (PSC) **UK** Managing at the Top (MaTT)
Elections/ UNCAC Article 8	**Norway** The Asia Foundation Election Working Group **Norway and UK** Preparation of Electoral Roll with Photographs (PERP) **Sweden and Denmark** Photo Voter ID **Sweden** Upazila and Zia Election Observation
PFM/UNCAC Article 9	**UK** Financial Management Reform Programme (FMRP) **UK** Reforms in Revenue Administration (RIRA)
Justice and police/ UNCAC Article 11 + Criminalisation	**ADB** GGP – Judiciary reform **UK** Police Reform Programme **Norway, Denmark and UK** Bangladesh Legal Aid Services Trust (BLAST)
Participation of society/ UNCAC Article 13	**UK** SAMATA **Sweden, Norway and UK** Making Waves, Transparency International Bangladesh (TIB) **Norway and UK** Manusher Jono Foundation **Norway** Ain o Salish Kendra
Non-AC sector: Primary education	Primary Education Development Program Phase II (PEDPII) (**ADB** and ten other donors)

2.15. Allocation was based on review of the documentation and discussion with donor staff in country. All major projects in the selected 'legs' were reviewed. Some smaller ones, or ones with little documentation available, or the 'older phases' in multi-phase projects, or where the project was supplementary to a larger project were generally not reviewed in detail. For jointly funded or jointly supported organisations, such as TIB, documentation from only one of the donors was used.

Conduct of the country visit

2.16. The structure of meetings during the country visit and a list of people who were consulted appears in Annex 3. Part of the visit included a field trip in which meetings were held with a TIB Committee of Concerned Citizens (CCC), and district, Upazila and Union Parishad level government officers and members of the judiciary and magistracy. A visit was also made to a primary school and a meeting held with the school management committee. The observations during the field visit were a valuable means of validating many issues that had emerged during interviews in Dhaka. Because the visit was to a few isolated locations with no possibility of random selection for representativeness, the information from the visit was used only to inform the interpretation of the evaluators and is not reported separately.

2.17. One afternoon in Dhaka was devoted to group discussion with representatives of the civil service and judiciary. During that meeting a participatory exercise to

examine the intervention logic in civil service reform and judicial reform was carried out. The appreciative enquiry tool was not used in that meeting owing to shortage of time.

2.18. Overall the team found that the approach worked fairly well. Delays in obtaining some documentation held back interviews and left the team having to review documents much later in the visit than originally planned. Interviews with some key respondents were also delayed until late in the visit, in part owing to absence with travel. A feedback session was held on 22 November and the presentation from that meeting is in Annex 9.

3. Country context

Summary of key points about country context

- The perception of corruption remains high in Bangladesh despite gradual improvement in recent years.
- The period of the caretaker government 2007-08, saw rapid progress in a number of areas such as the ACC and some aspects of civil service and justice sector reform. But momentum has not been maintained and future political commitment is still uncertain.
- Vested interests and other political economy factors explain slow progress in governance and AC reforms.
- Corruption costs fall disproportionally on the poor as well as curtail growth prospects.
- NGOs in Bangladesh have helped to compensate for poor governance in the government sector, and with it, weak public service delivery.

3.1. Bangladesh remains one of the most corrupt countries in the world. After being placed at the very top of the list of the most corrupt countries for five consecutive years (2001-05) Bangladesh's score in the Transparency International (TI) Corruption Perceptions Index (CPI) has nonetheless slowly improved over the years and in 2009, jumped to 2.4 from 2.1 in 2008 (0-10 with 10 being *free of corruption*), reflecting "*a perception of progress as a result of the then government's nationwide crackdown on corruption in 2007-08, which was accompanied by important institutional and legal reforms*". Such perception of progress appeared short-lived, however, and by the time of the country visit for this evaluation, most commentators noted a lower momentum for reforms under the new elected government.

3.2. The period covered by this evaluation is unusual as it spans three government regimes. After the Bangladesh Nationalist Party, in power since 2001, a prolonged caretaker government was installed in 2006, amidst continuous political unrest. In December 2008, the Awami League-led Grand Alliance won the parliamentary elections.

3.3. Government priorities around good governance and corruption are articulated in the National Strategy for Accelerated Poverty Reduction (NSAPR) Phases I (2005-08) and II (2009-11). Key to tackling corruption is also a planned NIS, developed as a concept by the caretaker government with support from the ADB.

3.4. Strengthening the AC strategy became central to NSAPR Phase I, although many actions, such as the creation of the ACC (2004) and a revised Procurement Act (2003) predated its publication. Little else was achieved in the following years until the caretaker government was installed in 2007. This military-backed government gave high priority to fighting corruption and, with the support of donors, initiated a number of crucial reforms. Most notably, UNCAC was approved; the ACC was revitalised, leading to a number of high-ranking politicians, government officials and businessmen being investigated and charged with corruption; reforms were initiated – and new Chairmen appointed – for key institutions, including the Election Commission and PSC;[5] and partial separation of the Judiciary from the Executive was achieved in line with Article 22 of the Constitution.

3.5. Although legislative reforms under the caretaker government were far-reaching, the elected parliament had yet to ratify many of its Ordinances after a year in office. Some Acts of significance, including the Right to Information Act, were passed; others not.[6] The government of Bangladesh (GoB) has also started showing signs of backtracking on some amendments, notably with regard to the ACC and Procurement, a matter of concern for donors and civil society alike. At the same time, the international community acknowledged that it was still early in the elected government's term and the government's priorities were not yet clear.

3.6. Strong vested interests in retaining the *status quo* largely explain the slow pace of progress in the fight against corruption in Bangladesh (see Box 3.1). Politics is frequently cited as the key driver of corruption in the country; following the restoration of multi-party electoral politics in 1991, the country's political system has become increasingly confrontational and centralised, reinforcing a winner-takes-all culture, where partisan politics dominate all aspects of public life from Upazila[7] (local) to central government level. Business and politics are tightly intertwined and the two clans representing the former ruling Bangladesh Nationalist Party and incumbent Awami league have continued to dominate – and vie for – private sector and bureaucratic interests in the country. International businesses are not exempt from corruption scandals either.[8]

5 A constitutional body, the PSC's role is to recruit civil servants through competitive examinations and provide advice on recruitment rules, promotions, transfers and other public service matters.

6 Notable among the Acts passed during the first parliamentary session were the Money Laundering Prevention Act 2009, Right to Information Act 2009 and the Code of Criminal Procedure (Amendment) Act 2009. Acts that were not passed by parliament included the Anti-Corruption Commission (Second Amendment) Ordinance 2007, National Human Rights Commission Ordinance 2007, Public Procurement Act (Amendment) 2007, Government Attorney Service Ordinance 2008 and Supreme Judicial Commission (Amendment) Ordinance 2008.

7 Upazila is an administrative unit of local government (in rural areas) between Union and District (Zila) level. It is administered by civil servants. There are about 508 Upazilas in Bangladesh.

8 During our country visit, the ACC pressed money laundering charges against Bangladesh Nationalist Party Chairperson Khadela Zia's younger son, Arafat Rahman Koko, accused of accepting bribes from, amongst others, Siemens.

Box 3.1: Political economy and corruption

The absence of drivers of change in Bangladesh – which explains the slow pace of governance and AC reforms – has been the subject of many research and diagnosis studies.

In recent years, the political economy discourse has evolved beyond that of simply noting the lack of political will to look more deeply into the main incentives, rules and constraints that characterise key institutions in Bangladesh – from bureaucracy to law enforcement agencies. Recent studies include a political economy assessment of financial management reform.[8]

There is a general consensus amongst Bangladeshi and international stakeholders that the international community needs to take into account the following political economy dimensions when supporting governance reforms in Bangladesh:

The GoB is only responsive where demands for change do not threaten the patronage system; little real action is taken elsewhere.[9] This explains success in promoting macroeconomic stabilisation but failure in pushing ahead with the fight against corruption and civil service reforms. *"The lack of political will and commitment to ending patronage and politicisation within the Bangladesh civil service prevents any radical reform of the public service in Bangladesh"*.[10] The politicisation of administration has left the Bangladesh civil service divided, has broken its chain of command and hierarchy and weakened its internal and external accountability mechanisms.[11] Certain aspects of politicisation – such as transfers to 'officers on special duty' – are intensely disliked by the bureaucracy, which remain for the majority apolitical. At the same time, the country is often said to be run by a handful of bureaucrats that enjoy power and prestige for being allied to the party in power.

Parliament remains dysfunctional and there is little democratic practice within the major parties, which are controlled from the top.

Donors conclude that working solely with state agencies is unlikely to be very effective unless other actions are taken elsewhere. This includes amplifying demand, supporting competition and improving political processes.[12] This is not to say that there are no reformers within state agencies, notably in the civil service, judiciary, police and armed forces. But the problem is that many individuals and organisations that offer potential for promoting change are often fragmented, isolated and insufficiently influential to bring it about.[13]

Actual or potential agents of change in Bangladesh include civil society, the media, the private sector, professional associations. However, while often vibrant and powerful, civil society and media in Bangladesh are not always independent and can be themselves prone to corruption.

Other lessons can be derived from political economy assessment in relation to the level of ownership, choice of partners and scale and type of donor interventions.

9 Foot, S. and Mubin, A.K. 2007. *Political Economy Assessment for Review of Financial Management Reform Programme*. DFID Bangladesh.
10 DFID. 2008. DFID internal documentation.
11 DFID. 2005. Managing at the Top Project Memorandum.
12 IGS. 2008. op. cit.
13 Moore, M. 2003. *Politics and the Drivers of Pro-Poor Change in Bangladesh.*
14 Duncan, A. et al. 2002 *Supporting the Drivers of Change.*

3.7. The politicisation of public administration – combined with low salaries, low morale, and the absence of appropriate, credible and/or effective rules and regulations – has further served to institutionalise corruption in public services. Stakeholders interviewed during the country visit characterise this by saying that corruption at the top is driven down through the public administration, leading to inefficient and ineffective mid-level administration, and widespread corruption at the lower levels of civil society and service delivery.

3.8. Corruption is endemic and systemic. According to the TIB 2007 National Household Survey on Corruption,[15] 66.7% of households experienced some forms of corruption in their transactions for public services and 42.1% had to pay a bribe for receiving services from different sectors, the most corrupt sectors being law enforcement agencies, local government and land administration. As well as speed payment to access public services, other main forms of institutionalised corruption include collusion between officials and contractors in the procurement of goods and services, and the purchase of public positions. In addition, corrupt behaviour has also permeated key institutions that have a role to play in the fight against corruption, with various reports[16] pointing, amongst others, to corruption within the police and judiciary, the National Board for Revenue and the PSC.

3.9. On a more positive note, the issues of corruption are discussed more openly in the country than in the previous decades, with the media raising cases of corruption almost on a daily basis.

3.10. In conclusion, corruption in Bangladesh affects all aspects of daily life and has become a feature of 'how things are done' for many private businesses, politicians, government officials and NGOs. Furthermore, according to the TIB 2007 survey, the incidence of corruption is indifferent to location and gender. This indiscriminate depth and breadth of the problem puts proportionally higher drain on poor household income.

3.11. At the same time, income poverty in Bangladesh has continued to fall and social indicators – such as life expectancy, fertility control, child mortality, literacy and enrolment rates – have improved. To some extent, macroeconomic stability, private sector-led growth, new technologies and the contribution of NGOs to basic service delivery have offset poor governance, including corruption. The World Bank nonetheless indicates that if Bangladesh had reduced corruption in the 1990s to the levels seen in Poland, annual growth would have increased by around 2%, and this would have helped to accelerate poverty reduction.[17]

15 The sample size was 5,000; the households were selected for interview through a multi-stage cluster sampling design.
16 See for example: Institute of Governance Studies. 2008. *State of Governance in Bangladesh 2007*. Dhaka: Bangladesh; Institute of Governance Studies. 2009. *State of Governance in Bangladesh 2008*. IGS Institutions of Accountability series. Dhaka: Bangladesh; as well as TIB. 2007. *Bangladesh Public Service Commission – a Diagnostic Study*. Dhaka: Bangladesh.
17 Information from interview

3.12. Relevance of the donor programmes

Summary of key points about relevance

- Donor-supported programmes are generally well founded on analysis of political economy and corruption. Analysis of how AC activities will support poverty reduction and attention to gender dimensions are treated less consistently.
- All donors have been highly responsive in their discourse to changing government strategy and political will to fight corruption. Only a few, however, have chosen to provide financial support to AC-specific interventions, notably support to the ACC.
- Donor assistance in Bangladesh is project-based, non-state agents being the largest beneficiaries.
- Not all projects with links to UNCAC articles mainstream corruption adequately in their design, goals and objectives.
- ADB's GGP remains the most relevant and coherent AC programme. UNCAC ratification helped shape the programme.

Scope and evolution of donor programmes

Donor stance against corruption

3.13. Donors have all closely aligned their strategy of engagement to national strategies and have responded to opportunities from the GoB's own plans for reforms to prioritise their governance and poverty reduction programmes in Bangladesh. Consequently, their programme documents make ample reference to NSAPR I and II. The period of the evaluation is at the same time characterised as stop-go on the part of the donors as they have tried to configure strategies and projects to match political realities under three successive governments. Their public stance against corruption, in particular, has evolved over the evaluation period, depending on how conducive the policy environment was at the time.

3.14. Even though donors anticipated the possibility of a slow-down in political commitment to AC after the 2008 election,[18] all responded positively to the caretaker government's AC pledge. At the beginning of the evaluation period, for example, DFID categorised the environment as 'discouraging' for taking initiatives in the area of corruption.[19] Consequently, the DFID Country Assistance Plan (2003-06) focuses rather broadly on 'participatory governance', and only mentions the word corruption six times. After the caretaker government was installed, DFID became more vocal and its interim Country Assistance Plan (July 2007-March 2009) goes as far as singling out "corruption and messy politics" as the main causes of poverty and inequality, mentioning corruption no less than 17 times.

3.15. By contrast – perhaps because of its client relationship with the government – the ADB maintained a greater consistency of purpose over the evaluation period. The thrust of the first Technical Assistance (TA)[20] already had a strong AC focus,[21]

18 DFID internal documentation. 2008.
19 DFID project memorandum on support to TIB for the project Making Waves Phase II 2003-07.
20 TA-4140 – TA to Bangladesh for supporting Good Governance Initiatives; TA-4743 TA to Bangladesh for supporting Good Governance Initiatives II; TA-4744 – Preparing the Good Governance Project; TAR-BAN 36197 – TA To The People's Republic Of Bangladesh For Preparing The Financial Markets Governance Programme.
21 This was divided between: a) supporting institutional AC initiatives in the secured financing sector of private credit markets; b) initiatives to establish an independent ACC, support a National Committee on Corruption Prevention and to carry out capacity building in those organisations and training of trainers for line ministries; and (added at later stage during implementation) c) dealing with the legal sector.

and as final preparation and start-up of the GGP coincided with the caretaker government, ADB changed the programme in specific detail to respond to the changing political climate and evolving priorities.[22]

3.16. After more than a year into the new administration, donors are still awaiting clear signs of commitment from the current government, and have started raising concerns about a possible reversal in AC. Retrospectively, both DFID's openly opportunistic approach and ADB's longer-term approach to AC come with limitations:

- Under the ADB approach, TA programmes on various AC issues ended up being largely ineffective, with the implementation of various TAs taking 3 years instead of 5 months, because of the weak political support at the time.
- DFID's approach raised high expectations and showed a lack of coherent, long-term vision: DFID's vision in the interim Country Assistance Plan was that *"by 2012, government will have continued the work begun by the caretaker government in 2007 and will be actively fighting corruption, and accounting better for the money it spends".* Yet this vision was put aside by the time the Country Plan (2009-14) was drafted, indicating a less open and intentional approach by DFID to fighting corruption in the country. This reflects donor difficulties in working in an environment where high level political commitment to AC fluctuates.

Main areas of interventions

3.17. Donor main areas of interventions of relevance to AC in Bangladesh have been four-fold:

- helping the government set up institutions that deal directly with corruption (most notably the ACC)
- supporting essential governance reforms, from PFM to support in the justice sector
- mainstreaming the fight against corruption in their support to social sectors;
- ensuring that their own money is not misused.

3.18. Annex 5, which maps the donor programmes against UNCAC, identifies 20 donor projects (irrespective of their sizes) as being of direct or potential relevance to tackling corruption in Bangladesh.

3.19. The composition of projects reveals significant differences in the level and scope of donor interventions. The largest single programme is the ADB-supported GGP (2007-12) which uses a development policy loan as the aid modality. The value is US$150 million plus an additional US$2.8 million for TA. The GGP, which was preceded and supported by a number of smaller TA, supports activities in three UNCAC categories dealing with preventive policies and practices (Articles 5 and 6), civil service reform (Article 7) and legal sector reform (Article 11 and Criminalisation). DFID's total portfolio over the evaluation period is the largest, totalling about US$200 million. The selected projects cover six UNCAC categories. Denmark's portfolio amounts to about US$45 million across five of the six themes, Norway's is US$35 million and Sweden US$3 million.

22 For example, the idea of a National Committee on Corruption Prevention was not pursued. Instead the concept of an NIS was developed, as Bangladesh ratified UNCAC.

3.20. The caretaker government and period leading to the 2008 elections created a valuable opportunity for donors to begin interventions in support of AC efforts and transparent political processes. Nevertheless, while all donors supported the electoral process, through the UN Development Programme (UNDP), only a few threw their financial assistance behind the ACC or UNCAC domestication, others (such as Sweden) preferring to join in by maintaining AC high on the agenda through dialogue with government.

3.21. Of the five donors, only ADB, Denmark and the UK have supported governance programmes dealing with AC policy and/or public sector reforms in Bangladesh. Denmark was in fact the only bilateral donor to answer ADB's call for support to ACC. Through its Good Governance and Human Rights Programme[23] Denmark has also supported legal reforms, TIB and the UNDP Advocacy Campaign Against Corruption. The links between donor interventions (ADB and Denmark) and UNCAC ratification are further discussed in 4.1.

23 Phase II was in preparation at the time of the country visit.

Box 4.1: Use of the UN Convention against Corruption as a legal and political commitment

Because UNCAC was formulated in 2003 and ratified by Bangladesh in 2007, its influence is only seen directly in the later part of the evaluation period. However, the donors were mindful of its provisions throughout the period and were quick to support the implications of ratification.

Reference to UNCAC was built into the activities of the ADB-supported GGP. ADB GGP promotes a holistic approach to AC, all three outputs being linked to UNCAC articles:

- Output 1: Vision, Strategy, and Procedures – GGP supports the development of a NIS as the overarching framework for AC efforts at the country level. NIS aimed at articulating the goals, targets, and approach of the UNCAC. The other strand of this output is TA and financial assistance to ACC and other AC work. Output 1 clearly fits within Article 5 and 6 of UNCAC.
- Output 2: Enforcement and Sanction Mechanisms – This focuses on UNCAC Article 11 and Criminalisation, with actions related to independent and transparent judiciary; and improved prosecution services.
- Output 3: Prevention Mechanism – This output entails support to strengthen accountability mechanisms within line ministries, namely actions related to public sector integrity, including support to the PSC and the revival of the Ombudsman Office. The main link with UNCAC is Article 7. Unlike the DFID MaTT2, the ADB GGP aims explicitly at supporting 'improved governance and lower incidence of corruption in the public sector in Bangladesh'.

Denmark supported the UNDP Advocacy Campaign Against Corruption (2006-08). The aim was to familiarise the Bangladeshi government and citizens with the significance and importance of ratifying UNCAC. Interventions were through the mass media, joint rallies with the ACC and training for senior government officials through the Bangladesh Civil Service Academy.

The Swedish Embassy in Bangladesh reports that it has made use of Bangladesh's obligations under UNCAC in dialogue at a political level behind closed doors.

In 2007, a comprehensive analysis of Bangladesh laws, institutions and procedures was carried out, with GTZ funding, leading to the publication of the Bangladesh Compliance and Gap Analysis in January 2008. A detailed action plan for compliance was subsequently drafted and published by GoB Ministry of Law, Justice and Parliamentary Affairs in November 2009.

3.22. In an internal note, DFID summarises its range of AC projects as follows:

- funding to NGOs working on human rights, labour rights, AC, access to social services, and access to justice
- technical support for elections, PFM, tax administration and police reform.

3.23. DFID is also involved in private sector development, with the aim to *'work with government and others to make investors feel more confident about doing business in Bangladesh'* (2009-14 Country Plan), and since 2006, provides extensive support in the area of civil service reforms under its programme Managing at the Top (MaTT2).

3.24. By contrast, support from Sweden and Norway is concentrated on two themes: political processes and participation of society. Although corruption has been consistently high on Sweden's political agenda in Bangladesh over the period, Sweden is not directly involved with governance projects, Norway underwent significant changes over the evaluation period, with a transition from development cooperation to institutional cooperation and a reduction of staff from eight to three. Consequently, a lot of projects were closed down, including their support to TIB, their main AC intervention.

3.25. The composition of projects also reveals the following trends:

- Donors have been able to maintain a consistent approach to their partnership with non-state actors, as demonstrated by their long-standing support to TIB.
- Some governance themes, such as PFM and revenue admininstration, have benefited from long-term bilateral engagement.
- Most initiatives receive separate support from bilateral and multilateral donors; some – such as support to the 2008 election and police reforms (both with UNDP) – were joint donor efforts.
- Global initiatives include Norway's Corruption Hunters Network, and during the caretaker government years, DFID-funded World Bank and UN Office on Drugs and Crime (UNODC) Stolen Asset Recovery initiative.[24]
- There are also some apparent gaps. Although the DFID Regulatory and Investment Systems for Enterprise (RISE) programme deals with corruption facing the private sector; this remains in essence a public sector reform programme, which does not seek to fight the demand for corruption coming from the private sector although other donors, principally the US, are active here.

3.26. Looking more broadly, service delivery has continued to dominate donor funding in Bangladesh: for example, ensuring primary level services in education and health has remained at the core of Sweden's development assistance in the country. In addition, because of the lack of opportunity for general budget support and other programme-based development assistance, all donors in Bangladesh have continued to disburse their aid through a balanced portfolio of projects in support of government initiatives and civil society organisations (CSOs).

Assessment against the UN Convention against Corruption Articles

3.27. The UNCAC Articles provide an organising framework against which the relevance and level of support from the donors can be described:

- Articles 5 and 6, Preventive policies, practices and bodies: addressed by the GGP. This is highly relevant for its scope and clarity of objectives, but comprises only moderate levels of support.
- Article 7, the Public Sector: addressed by the GGP and DFID MaTT2 project. Both are relevant and with their small scale of intervention comprise low levels of support.
- Article 8, Codes of conduct for public officials: addressed in part by work under Article 7, but more specifically by support to the election process. This latter ele-

24 This global initiative facilitates the establishment of an inter-agency task force on asset recovery, building international links and cooperation between law enforcement agencies in those countries where the stolen assets are held or are suspected to be held. The initiative has since stalled under the new government.

ment was relevant and the level of support, although not of great financial value, was high in terms of the timing and scale of the electoral process.

- Article 9, Public procurement and management of public finances: addressed by support to PFM and revenue administration. This was relevant and at a moderate to high level of support.
- Article 11, Judiciary and prosecution service: addressed directly through the GGP plus other support to legal aid. Both were highly relevant as is support to the police, which is partly covered under Article 8. The level of support has been low.
- Article 13, Participation of society: addressed generally through support for empowerment, with notable focus on issues of gender and poverty; and more specifically on demand-side issues concerning citizen awareness and corruption in service delivery. Relevance is high and the level of contribution moderate to high.

Quality of donor analysis and project design

Donor analysis

3.28. Good background analysis has been reflected in the donors' overall strategies. Most country strategies take into account a wide range analysis from independent think-tanks and non-state actors, including TIB analysis and surveys. As stated by Duncan et al. (2003), "there is widespread agreement on the nature of the problems in Bangladesh, and even on what needs to be done. There is little agreement, however, on how to go about it".[25]

3.29. DFID's country strategies are firmly grounded in extensive diagnosis governance studies.[26] DFID did not produce any specific analysis on the state of corruption in Bangladesh until 2009,[27] when an assessment of corruption risk was included in their overall Fiduciary Risk Assessment.[28] DFID rates the overall risk of corruption as high and describes corruption as endemic and systematic in both the private and public sectors.[29]

3.30. The ADB GGP makes extensive reference to an ADB Country Governance Assessment completed in 2004 and there are also diverse references to work undertaken by research entities and NGOs in Bangladesh. In this report and associated project documents, ADB adequately reports as well as assesses the extent of corruption in Bangladesh, by looking at 'Corruption as a key Governance Problem' as well the 'Issues and Opportunities' required to tackle the problem, especially in term of the ACC.[30] The assessment also establishes some key principles in dialogue with member countries and in project documents, including the need to facilitate greater accountability and transparency in public administration and increased citizen voice in public decision-making.

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25 op. cit.
26 This includes:
- Kochanek, S. March 2003. *The Informal Political Process in Bangladesh*.
- Moore, M. February 2003. *Politics and the Drivers of Pro-Poor Change in Bangladesh*.
- Hobley, M. February 2003 *Power, Voice and Creating Space: analysis of local level power relations.*
- Duncan, A. et al. 2002. *Supporting the Drivers of Change.*
- DFID. 2006. *Political Economy Assessment*.
- and other internal documentation.

27 It appears that an analysis of systemic corruption was commissioned in 2007. This document was used as a reference and quoted in the 2009 *Fiduciary Risk Assessment*, yet was not known to DFID advisors at the time of the country visit.
28 DFID. 2009. *Managing Fiduciary Risk when Providing Financial Aid*. How to Note. DFID: London.
29 DFID. 2009. Internal documentation.
30 ADB. *Proposed Program Loan and Technical Assistance Grant*. GGP.

Mainstreaming of corruption in specific programmes

3.31. Donor analysis has not always been taken up in the programme design. The links between specific donor programmes and how they contribute to the fight against corruption are not often explicit, and not all selected projects listed in Annex 5 have mainstreamed corruption adequately in their design, goals and objectives.

3.32. The ADB GGP aims directly at fighting corruption, its goal being improved governance and lower incidence of corruption in the public sector in Bangladesh. Therefore, this programme is found to be highly-relevant to AC (see Box 4.1). TIB's mandate also specifically deals with AC.

3.33. Outside ADB GGP and jointly donor-funded TIB, only three donor programmes make the fight against corruption (or a particular form of corruption) their goal or purpose:

- The DFID's RIRA project has among its aims strengthening the capacity of the National Board of Revenue in investigating and prosecuting tax evasion. The issue of corruption within the National Board of Revenue is also fully acknowledged.
- The Police Reform Project aims to *"to develop a safer and more secure environment based on respect for human rights and equitable access to justice through police reform, which is more responsive to the needs of poor and vulnerable people including women".*[31] Of the seven components of the police reform programme, three aim to reinforce police capacity in dealing with crime prevention, investigation and prosecution (though with no specific reference to corruption) and three aim at strengthening police behaviour through human resource management, oversight strategy, and communication. As much of police behaviour is related to corruption issues, this makes the programme highly relevant to AC.
- The DFID's RISE programme's goal is poverty reduction through sustained pro-poor growth, with a purpose of creating an improved investment climate making Bangladesh a better place to do business. The approach is to undertake regulatory reform to ease the current high levels of red tape, corruption and outdated laws. More specifically, *"RISE aims to reduce the regulatory costs of doing business by 25 , and a 50 reduction in informal payments/corruption to GoB agencies".*[32]

3.34. To a lesser extent, a detailed review of the causes of corruption in elections was also made in the PERP project. Problems encountered in the elections were identified as: flaws in the electoral process, controversy and violence arising over the election results, and uncertainty over the aspirations of the population in the franchise.

3.35. The links between other governance programmes and how they contribute to the fight against corruption are not always explicit. For example, MaTT2 focuses on behaviour change and the PFM reform programme (PFMRP) focuses on system strengthening; MaTT2 is based on a driver of change theory, whereas PFMRP indirectly aims at reducing opportunities for corrupt malpractice in the form of leakages.

31 DFID-UNDP. *Police Reform Programme Revised Project Document Phase 1.* (p. 9).
32 DFID RISE Project Memorandum.

Gender and poor people

3.36. Donors were found not to have paid sufficient attention to the forms of corruption affecting poor people and women the most in their governance and AC programmes. There has generally been a dearth of analysis of how promoting good governance and fighting corruption will benefit poorer people and a lack of attention to the gender dimension. It is generally assumed that the benefits of promoting good governance and fighting corruption will trickle down to all sections of the population. Mainstreaming poverty and gender issues in governance programmes is often harder than in social sectors but this material is not always incorporated into the programme design. This is particularly the case for prevention mechanisms.

3.37. There are nonetheless some positive exceptions in some programmes reviewed:

- Efforts were made over the evaluation period to mainstream all forms of corruption, including those affecting poor people and women, in the design and implementation of ACC support. For example, one area of high relevance was the development of local level committees (Duprak) which offered scope to tackle corruption affecting the poorest and most vulnerable people.
- In the case of the DFID/UNDP Police Reform Programme, gender and poverty dynamics in relation to corruption were taken into account. For example, it is noted that "*Inequality in Bangladesh is determined by land and other resource concentration, weak public services and administrative corruption which are severe barriers to access for the extreme poor …. All these inequalities are exacerbated in the case of women, for whom social and religious norms undermine their status and human rights*"[33].
- Participation of society projects also show that an analysis of the state of corruption was done with specific reference to poor people and women. For example, in the Project Memorandum for supporting TIB's project Making Waves Phase II, DFID has analysed the country's corruption scenario in detail as well as explaining that government machinery for addressing and preventing cases of corruption was not in place. The initial chapters of the Memorandum show how and why the poor suffer the most in Bangladesh. Similarly, Ain o Shalish Kendra, Manusher Jonno Foundation, and BLAST also explore the links between gender, poverty, justice and human rights.

3.38. Finally, in non-AC and governance sectors, donors in Bangladesh have increasingly sought to maintain a strong focus on improving governance within social sectors (see Chapter 7). In the interim DFID Country Assistance Plan, "measurable reduction in corruption improves services for the poor in publicly-funded services (health, education, water and sanitation)" is chosen as a long-term outcome. The work of TIB in social sectors also fits well within this approach.

33 SAMATA Project Memorandum, 16 August 2001. (p. 8).

4. Donor ways of working

Summary of key points on donor ways of working

- Few indicators to measure changes in corruption are used, most deal with broader governance reforms or changes in government policy. There is little articulated intervention logic linking up projects with AC.
- Donors' attitude to the risk of corruption is reflected in their choice of aid delivery mechanisms and safeguard measures (including the use of a managing agent). Both funding to state and non-state agents was frozen where fraud was detected.
- Donors have introduced increasing financial and governance requirements on programme partners over the period and these are viewed generally as a positive step by partner CSOs and government.
- The donor project-based approach, coupled with weak government leadership, the lack of a national AC policy, and different ways of working between ADB and bilateral donors, explain low donor coordination in governance and AC areas.
- Dialogue with the GoB was good during the caretaker government, less so now. Donor engagement with national stakeholders remains for the large part fragmented.

Monitoring and evaluation: focus on results

4.1. Table A1 in Annex 1 presents an illustrative summary of indicators at goal and purpose level for seven of the UNCAC categories. There is a clear need to distinguish between policy-based programmes, such as GGP and PFMRP, which use policy benchmarks as a way to measure progress against their goal purposes and capacity building programmes, which use more traditional outputs, outcomes and impact indicators.

4.2. The latter show that at goal level the only specific AC indicator is reference to the TI ranking on corruption. There have also been some attempts to introduce perception indicators to measure people's confidence in governance institutions, including the justice sector and police. According to ADB, perception surveys for data at the level of impact are planned for the third and fourth quarters in 2010 for GGP, with a focus on UNCAC, NIS and ACC. At purpose level there are indicators linked to the work of the ACC, processing of corruption cases through the courts and level of trust in the police; but most project indicators relate to specific measures, from the level of training achieved (MaTT) to computerisation (RIRA).

4.3. Overall, whilst many projects have comprehensive statements of output and outcome indicators structured according to logframe results chain principles, the

quality of indicators is often poor and the underlying results chain poorly specified[34] and there is a heavy preponderance of narrowly project-specific indicators, even at higher levels. In addition, many projects experienced revisions to indicators during implementation, often to tackle these deficiencies, but resulting in a loss of continuity in reporting. And when introduced, perception surveys have been characterised by low frequency and/or low quality.

4.4. Looking at policy-based lending, the ADB GGP is designed around a structure of annual progress reports plus monitoring of development policy triggers for tranche release. The policy triggers for disbursement under the programme provide the main source of monitoring. The design of the programme was deliberately structured for fast disbursement with a first tranche at start-up, a second after 12 months and a later tranche after 24 months, so that there was incentive for rapid progress following the caretaker government and then a longer period for consolidation leading up to the third tranche. Whereas some indicators focus on establishing policy, legal and institutional reforms[35] within a realistic timeframe, others – such as those requesting the government to make public announcement or issue circulars to all public servants – were found too 'soft' to provide effective proxy indicators of progress.

4.5. All tranche triggers consist of implementation actions; and none relate to implementation performance or are derived from the perceptions or evidence of non-state actors or other participants in reform.[36] It is nonetheless worth noting that the GGP also comes with a result framework with an ambitious set of output and outcome indicators. Yet, as presented in the project document, although they are comprehensive for the activities supported by the GGP, they are specified without target quantification and time frames. The lack of clear time dimensions led to the 2008 Progress Report noting that 13 of the 26 output indicators were '*to be reported at a later stage*' or '*towards the end of the programme*'.[37]

4.6. Elsewhere, donors have relied on the NSAPR M&E framework to monitor progress of their governance programmes. Yet none of the indicators has a poverty dimension nor are any disaggregated by gender.

4.7. Clearly, the design and specification of project objectives and indicators do not fully reflect the link between many donor governance projects and the fight against corruption. These appear as either implicit in the design or by-products of broader governance reform.

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34 In the performance assessment questionnaire documentary review, only four projects (less than 30%) had a clear expression of a results chain that was being monitored.

35 Including for example: 1) reconstitution of the ACC in line with the UNCAC provisions, 2) separation of the Judiciary, 3) approval of an NIS, 4) annual declaration of assets by civil servants and judges, 5) legislation to prescribe qualifications for recruitment of Supreme Court judges, 6) creation of an independent prosecution service, 7) establishment of the Office of the Ombudsman, 8) legislation of the Right to Information Act, 9) introduction of Citizen Report Card, and 10) legislation of a Whistleblower Protection Act.

36 Specification of policy conditions for policy loans needs to bring an appropriate balance between simple output measures which can easily be accomplished, and the development change resulting from those outputs. The Implementation Completion Report for the first World Bank Development Support Credit to Bangladesh in 2004 noted that "*in development policy operations, conditionality should stress effective implementation of laws and/or measures rather than their adoption by the Government or submission to parliament*."

37 The indicators also suffer from three weaknesses: 1) they are not responsive to short term change and therefore are of little use to managers; 2) they do not convey information about progress along the results chain towards outcomes, so have little strategic merit; 3) they lack a comprehensive or balanced structure, so do not bring together information about implementation progress, perceptions of citizens or users of services and hard data from administrative or legal procedures. However, in the view of the ADB they are "*clear for what we want at the output level*".

4.8. Two contributory weaknesses are, first the absence of a national AC strategy with objectives and indicators that projects can contribute to. Second is the absence of a well-articulated intervention logic that would help project designers identify the expected nature of change that could be measured. In addition, corruption indicators are often lacking (see Box 4.2).

4.9. In some areas, opportunities exist to make greater use of quantifiable indicators, such as findings from audit reports, results from expenditure tracking surveys, and prosecutions for corruption. Bangladesh, however, faces the additional challenge of not using common frameworks such as the Public Expenditure and Accountability for assessing the quality of PFM systems in the context of financial management reforms.

Box 4.2: Availability of corruption indicators in Bangladesh

This evaluation shows that very few projects supported by donors generate corruption indicators. According to the World Bank, *"in many areas of governance, there are few alternatives to relying on perceptions data. This is most particularly so for the case of corruption, which almost by definition leaves no paper trail that can be captured by purely objective measures".*[37] This may explain why donors principally rely on TI CPI to monitor corruption levels in partner countries. Yet the impartiality, quality and methodology of TI CPI – as well as other international datasets – have been questioned, because they are mostly based on the perception of selected international actors.

There are nonetheless possible ways forward.

- Firstly, other national perception surveys by TIB, the Institute of Governance Studies (IGS) and the Asia Foundation can be used to challenge and complement TI CPI results.
- Secondly, some forms of corruption can be measured with more accuracy. For example, the incidence of bribe payment as reported by sample households should be seen as depicting more a reality than a perception. Disaggregated gender data exists.
- Thirdly, findings from audit reports and results from expenditure tracking surveys can also usefully point towards financial irregularities – the main limitation being that it is not possible to verify whether these irregularities are the outcome of corruption or the products of weak systems and/or poorly-enforced rules and regulations. Although corruption leaves no paper trail behind – improved auditing processes that look at performance can play a useful role (see Chapter 6 on PFM).
- Finally, progress in the fight against corruption can be more readily measured, through keeping records of corruption investigation, prosecution cases, and the number of audit observations acted upon by the government.

Managing risks in donor programmes

4.10. As well as monitoring results, donors have established formal procedures for routine programmatic and financial reporting. These procedures have been largely followed and in some instances have allowed donors to detect and respond to specific cases of corruption during programme implementation. Donors, however, recognise that these safeguard measures are not always sufficient. For example, a

38 Kaufmann, D., Kraay, A. and Mastruzzi, M. 2009 *Governance Matters VIII. Aggregate and Individual Governance Indicators 1996-2008*. Washington DC: The World Bank.

weakness of donor safeguards against corruption is that most financial irregularities are detected through auditing, which comes during the mid-term or end-term of the project. It has been much more difficult to identify irregularities through monitoring.

4.11. In some cases, donors have agreed to use common financial and programmatic reporting procedures, when providing core funding to CSOs, such as support to TIB. But further efforts are needed towards harmonisation: some studies have found that NGOs are under-resourced to meet the reporting burdens imposed by donors and that increased and uncoordinated reporting and monitoring requirements distract the NGOs from their core objectives.[39]

4.12. The use of managing agents has provided an additional safeguard mechanism for donors. Donors have acknowledged corruption within the institutions that they support. For example, in its project document, ADB recognises that the PSC itself is "*politicised and has been accused of corruption and a lack of transparency*".[40]

4.13. In response, DFID has set up project management units within the institutions that it supports (including RIRA and the Planning Commission), to help ringfence its own funds and in so doing, protect them against the risk of corruption.

4.14. All donors follow HQ AC policies. Danida has a 'zero-tolerance policy' of not accepting corruption within Danida itself, in programmes supported by Danida, or within external partners administrating Danida funds. Danida's Action Plan to fight Corruption 2003-08[41] centres on the prevention of corruption to reduce poverty. The Action Plan covers the bilateral, multilateral and civil society partnerships of Danish development cooperation and streamlines AC considerations/activities into Danida programmes and aid management guidelines. While its first two components focus on protecting Danish development against corruption, *"each and everybody belonging to the Danish aid delivery system must adhere to the highest possible standards of integrity in all situations",*[42] the third component focuses on the development of programmes that directly support AC in recipient countries, which, in the case of Bangladesh, falls under the Good Governance and Human Rights Programme umbrella.

4.15. Financial management and monitoring of the use of Danish funds has tightened in Bangladesh both in response to the Action Plan and in response to the level of corruption in the country. The Danish Embassy in Bangladesh has recently introduced a corruption hotline, promoted through its website, to encourage the reporting of the misuse of Danish funds in Bangladesh.[43]

4.16. Norway has also a zero-tolerance to corruption. Norway uses a Memorandum of Understanding to explain their stance against corruption and shape their relation-

39 Stapleton, A., Moran, G and Hossain, S. 2007. *Joint Assessment of Prospects for Harmonisation within the Justice Sector in Bangladesh*. Commissioned by the Justice and Human Rights Working Group of the Local Consultative Group of the Development Partners in Bangladesh. Funded by CIDA, DFID-World Bank Trust Fund, Danida and GTZ.

40 ADB. 2007. *Report and Recommendation of the President to the Board of Directors*. Proposed Loan and Technical Assistance Grant. People's Republic of Bangladesh: GGP. Project number: 37017.

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ship with the host government. A significant share of their support to NGOs is designed to improve governance within the organisations themselves. The same can be said with sector support, where donors negotiate with line ministries a number of requirements, such as the distribution of governance manuals, regular follow-ups and local training, as a way to mitigate the risk against misuse of their money.

4.17. Looking at the government sector, DFID, alongside bilateral donors, decided against providing General Budget Support to the GoB. Consequently, only 35% of DFID money goes to the government in recognition of the high fiduciary risk and the important role that non-state actors play both in terms of service delivery and advocacy. No donors use the national procurement systems.

4.18. The 2008 Survey of Monitoring the Paris Declaration confirms both a moderate donor alignment to country systems in Bangladesh and important differences in the way donors work. As shown in Table 4.1, for example, donor alignment to the country's PFM systems (consisting of budget execution, financial reporting and auditing) ranges from 15% (UK) to 100% (ADB).

Table 4.1: Paris Declaration indicators

	Aid to government sector (US$ million)	Use of PFM systems		Use of procurement systems	
		2005	2008	2005	2008
ADB	427	100%	100%	62%	76%
Denmark	26	0%	0%	0%	0%
Norway	2	67%	42%	100%	42%
Sweden	0	n.a	n.a	n.a	n.a
UK	66	100%	15%	100%	17%

Source: 2008 Monitoring Survey of the Paris Declaration (OECD-DAC).

4.19. Finally, donors were found to have frozen their assistance where fraud was detected:

- National stakeholders have raised concerns that because of their pressure to meet their spending targets, donors were more lenient in the way their money was being spent or used to support government programmes. There are nonetheless some instances when donors stopped their support to line ministries. This includes the GoB's Roads and Highway Department, which DFID supported in the first half of the evaluation period, and in 2002 the Danish Ambassador publicly accused the Minister of Shipping and Water Transport of corruption and Danish funding was cut.[44]
- SAMATA is the most cited example of donors withdrawing support from CSOs. A significant share of donor support to CSOs is designed to improve the governance systems of the organisations themselves, and NGOs welcome the concomitant rise in their reputation as reliable and honest organisations.

44 *Denmark withholds Bangladesh Aid*. Retrieved 3 May 2011 from http://news.bbc.co.uk/2/hi/south_asia/1929370.stm

Donor coordination and dialogue with government

4.20. Coordination between the donors in governance and AC areas has been patchy, though not non-existent. In the absence of the Bangladesh Development Forum during the period (the previous one took place in 2005 and did not meet again until 2010), coordination has been dependent on the functioning of the Local Consultative Group (LCG), under which there is one working group on governance. In the view of donors, the LCG has been ineffective since 2005, failing to provide a means for development partners to develop common positions. A number of issues explain this.

4.21. Firstly, the contrasting scale and modality of engagement makes coordinated actions more difficult. Donor propensity to spend money in the government sector has remained limited. Although ADB (and the World Bank) provides general budget support to the country, bilateral donors do not.[45] The donor project-based approach is even more pronounced in the area of governance and AC, where multi-donor interventions, outside support to core funding for CSOs, and UNDP basket funding,[46] do not exist. For example, a large number of donors support different interventions at different entry points in the justice sector.[47] Similarly, engagement in public sector reforms is largely fragmentary, with many small-scale and often uncoordinated initiatives. This lack of joint donor funding mechanisms has prevented donor coordination in governance and AC in Bangladesh.

4.22. Secondly, weak government ownership and leadership, coupled with competition amongst various departments and agencies, have rendered donor coordination difficult. For example, the Ministry of Establishment (which reports to the Prime Minister) has failed to link up with other key ministries and agencies, notably the PSC and the Public Administration Training Centre. Similarly, the long and slow progress towards separation of the judiciary and the executive has created divisions between the Supreme Court and the Ministry of Law, Justice and Parliamentary Affairs, again making it difficult for donors to adopt a harmonised approach in the justice sector.[48]

4.23. Thirdly, the lack of a national AC vision around which development partners can align has not helped. Donors have pointed to the need for a national accountability framework to facilitate communication with government, identify entry points and coordinate support. It was hoped that the NIS would fulfil that role and it was included as a policy trigger in the ADB GGP. But the draft has now been awaiting government approval for over a year and momentum will have to be regained after cabinet approval is received.

45 DFID had plans to begin budget support during the caretaker government but this came to a halt, after the fiduciary risk was deemed too high. A Project Memorandum entitled *Unlocking the Potential: Supporting Government's Service Delivery and Anti-corruption Initiatives* was drafted in 2006 to support governance reforms in key sectors (education and water). The programme intended to provide GBP 150 million over 6 years. This included 5 years of Sector Budget Support totalling GBP 135 million that would pass through the Ministry of Finance and the budget process, and GBP 15 million on Technical Cooperation. It was intended that the achievement of ambitious but realistic targets for governance reform, used to roll out improved service provision, would trigger performance-based sector budget support.

46 The Justice Sector Strategic Fund, driven by DFID, was planned to launch in mid-2010. It aims to create a forum for reflections on past lessons and to support increased inter-agency cooperation in the justice sector. UNDP will initially manage the fund and provide the secretariat. Other donors, including the World Bank and Danida, were considering their involvement.

47 Authors' interviews with commissioning donors, November 2009.

48 Interview with UNDP Bangladesh, November 2009.

4.24. Fourthly, the ADB – which has by far the most explicit and coherent AC programme in the country – has failed to win support of bilateral donors for participation in the GGP. This mostly indicates different ways of working between ADB as a lending multilateral agency and bilateral agencies.[49]

4.25. This non-conducive environment has curtailed donor momentum to change their ways of working in order to share information and coordinate their response. There have been several instances of attempts at a joint approach from some of the donors over the period. For example, a Joint Strategy Framework was established in 2006 between the World Bank, DFID, Japan and ADB, but this has not worked effectively. With so many fragmented initiatives in AC and governance, there have been no formal arrangements for joint review of performance and no scope to develop an *ad hoc* arrangement through the dysfunctional LCG.

4.26. The generally unstable political situation has also had an impact on donors' ability to pursue high-level dialogue with the government; whereas dialogue with caretaker government was good and effective, donors have adopted a wait and see approach with the newly elected government. In the absence of the Bangladesh Development Forum, there has been no regular platform for high-level policy dialogue and most discussions between donor and the GoB focus on lower-level technical issues.

4.27. Even then, the level of engagement and consultation with government has not always matched up to the close alignment to national strategies. ADB ensures a close consultation with government counterparts both during the design and implementation of its TAs and the GGP – which in the case of GGP, are the Cabinet, Ministry of Establishment and Ministry of Justice. Bilateral projects define donor engagement with government counterparts, such as Ministry of Finance, Ministry of Establishment and National Board of Revenue, as implementing agencies.

4.28. This project approach has been at the expense of wider consultation and coordination. For example, the need for a greater focus on linkages with broader governance reforms is emphasised in the second annual review of RISE that identifies a need for 'stronger coordination and cooperation with other projects (other than those in RISE), including good governance initiatives. A particular weakness in the fight against corruption is that, notwithstanding more than a decade of technical and financial support, donors have not been successful in engaging members of parliament on the policy agenda.

4.29. Support to the elections (see Chapter 6) is perhaps where donors have shown a more balanced approach to consultation with a broad range of stake-holders. Both PERP and the Asian Foundation Election Working Group projects were indeed designed fully in keeping with the national strategies, with the GoB and NGOs being at the centre of the project design and implementation process.

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49 For example, a series of '*Vulnerability to Corruption Assessments*' are being prepared under the ADB-supported GGP. One concerns the education sector and was in draft at the time of this evaluation. But despite that sector being of interest to ADB and at least ten other development partners under PEDPII, none interviewed by this evaluation were aware of the draft or had been consulted during its preparation (including the Programme Liaison Unit for PEDPII). The education draft was not made available to the evaluators. Others in the series include the Chittagong Port Authority (completed), Bangladesh Railway, health and power sectors.

5. Effectiveness of selected programmes

Summary of key points on effectiveness of selected programmes

- ACC activities expanded over-ambitiously under the caretaker government, given capacity building issues and lack of oversight mechanisms.
- Despite the overall good performance of donor interventions, impact assessments show little results in strengthening PFM and revenue.
- ADB support to the PSC has allowed small positive steps to take place. Overall, however, very little has been achieved in civil service reforms.
- DFID's approach of combining training with advisory support to the Ministry of Establishment was sound yet ineffective in the absence of high-level political commitment.
- Actions in support of an independent judiciary have been helpful. Pressure needs to be maintained to complete the separation of the judiciary from the executive.
- DFID support to the Police Reform Programme has been effective in increasing transparency but its progress in reducing corruption is difficult to gauge at present.
- The period of the caretaker government enabled a lengthier and more substantive period of support that strengthened the election commission and created a viable and modern voters roll.
- Donor support for demand side work has been relatively successful. TIB's clear agenda and work on the ground have helped build awareness and motivate actions to reduce corruption.

Anti-Corruption Commission

5.1. The ACC has been functioning for a relatively short time in its current incarnation. In 2004, the ACC replaced the Bureau of Anti-Corruption, which was set up in 1957 and reported directly to the office of the Prime Minister. The Bureau had become almost completely redundant and was seen as an inefficient, inoperative government department.

5.2. To a large extent responding to donor pressure, the government drafted a reform bill to create the ACC in 2004. Under-staffed, the ACC was unable to make much progress until 2007 when, with the arrival of the caretaker government, an ex Chief of the Army, General Hasan Mashud Chowdhury, was appointed as Chairman. A flurry of activities followed; the caretaker GoB published the ACC Rules of 2007 to strengthen the Commission, which was fully revamped in terms of staffing[50] and given new investigative powers to speed up processes.[51] As a result, the ACC was able to recruit its own staff and operate independently from the Executive. This

50 The Chairman was a former Chief of Staff of the army and former advisor to the first caretaker government and the other two Commissioners comprised a former judge and former Commissioner in the customs department.

51 A corruption offence is non-bailable, and the AC could freeze property and order a 30 days detention without sanctions from the courts. Other investigative powers were added, e.g. a review of one's wealth and a lifestyle statement.

encouraged optimism that the ACC would be an effective instrument, capable of tackling corruption at all levels including the highest strata of public life.

5.3. With the enormous task at hand, General Chowdhury said when interviewed during the evaluation: "*I had two options; to work like a goldsmith with a delicate hammer slowly moving forward to complete this task or to work like a blacksmith with a heavy hammer smashing ahead to begin this necessary task of eliminating corruption. I chose to be the blacksmith.*"

5.4. In addition to this strong 'blacksmith' approach of the new commission – involving investigation of high-level corruption cases – the ACC started promoting public participation in prevention of corruption. After consultations with the IGS and TIB, the ACC set up so-called Duprak committees of Citizens Against Corruption, based on the CCC concept of TIB.[52] The ACC also developed partnerships with CSOs to raise awareness against corruption. These activities enhanced the credibility of the ACC as an institution,[53] but required intense travelling to the field.[54]

5.5. A loss of momentum under the current government and concerns about the robustness of some high-level prosecutions have since set back progress. After the elections in 2008, General Chowdhury resigned and a new Chairman was appointed. The evaluation mission were told during interviews, and observed during the field visit, that the Upazila committees were also now fairly dormant.[55]

5.6. An area of concern for the survival of the ACC during the evaluation country visit was the set of amendments to the ACC Act that the elected government recommended before a Cabinet Division committee of senior civil servants. The recommendations included some that would have seriously compromised the independence of the ACC. This shows that any AC progress made under a non-elected, military-backed government faces a strong risk of not being sustained.

5.7. Judging how effective an ACC should be after a working experience of only just over two and half years remains difficult. As for the outreach and preventive challenge, ACC's response was more than adequate and the donors as well as the wider public were quick to recognise and support the effort. But the ACC also showed a serious lack of capacity in its execution of the challenge to investigate and to prosecute.

5.8. A number of specific capacity building issues were highlighted during the country visit:

- The expansion of activities was over-ambitious because it remained unsupported by the necessary capacity to channel the work with complete competence.
- There was a lack of focus on accountability and reporting mechanisms and a lack of oversight within the establishment and from supporting donors.

52 Each district and Upazila had a committee of seven to eight people, totalling almost 500-550 committees around the country (data supplied by ACC).
53 IGS BRAC. 2008. *The State of Governance in Bangladesh.* (p. 81).
54 At that time, 15 days in the office and 15 days in the field was the philosophy of the senior ACC staff, including its chairman. However the sustainability of this model of functioning required successive chairpersons to be physically able to keep up this routine.
55 Interview during field trip to Gazipur as well as further interviews with ACC staff and civil society.

- Past and present TA support was criticised for not being sufficiently grounded in the Bangladesh context and instead drew too extensively on models elsewhere (such as Singapore and Hong Kong).

5.9. A main lesson emerging from Bangladesh is that donors, alongside the caretaker government, moved too fast in revitalising a moribund ACC, when concomitant support to investigation and prosecution by police and judiciary was needed. That approach was partly implicit in the support through the ADB GGP (See Box 4.1) – but in the case of Bangladesh there is still much discord between the various parties, and the efforts of the ACC are regularly frustrated by the lack of support.

5.10. Given the existence of a revitalised ACC, more attention should have been paid to its interactions and linkages with other key institutions. The ACC Act as well as follow up policy documents and other reports have all recognised that supporting agencies (the Judiciary as well as the Police) have to play a strong role in the success of the ACC, yet the relationship between these agencies is still a matter of concern.

5.11. The emerging view that some of the ACC actions under the caretaker government may have been politically motivated has also weakened the ACC. This, combined with fluctuating government support for the ACC over the evaluation period, shows that in practice the ACC still lacks political clout and independence from the executive.[56]

5.12. The politicisation of ACC as a public institution and the uncertainty that come with it was the main reason given by donors (including DFID) for not supporting its AC work. This has left the ADB vulnerable to criticism as the sole donor of support in a politically-sensitive context. As explained in previous Chapters, although all donors applauded the caretaker government's commitment to AC, only Denmark and ADB came forward to support the ACC – with Denmark support being narrowly targeted TA. Furthermore, Danida TA support had not yet begun by the end of 2009, despite Danida funds having been transferred to ADB.

Public finance reforms

5.13. The main donor support in the area of PFM entailed support to the Public Accounts Committee (PAC) and the C&AG on one hand and support to strengthen tax collection on the other.

5.14. Danida and DFID provided support to parliamentary committees (including the PAC) through the UNDP-led programme, Strengthening Parliamentary Democracy. In 2005, DFID decided to withdraw its support because of the project's disappointing performance. According to DFID, the timeframe was too short for the ambitious level of change envisaged and the project was vulnerable to the lack of existing political incentives to allow parliament to function. An independent evaluation of the project concludes that, "*actual progress towards the development objective of strengthening parliamentary democracy has been limited due to the project's nar-*

56 The ACC is under the Prime Minister's Office. Recruitment responsibility lies with the Ministry of Establishment and selection with PSC. Financially the ACC is dependent on the Ministry of Finance.

row definition of its role and the adverse affects of the polarised environment".[57] An area of success was nonetheless the introduction of a parliamentary rule requiring the timely establishment of committees after election of a new parliament – this new rule ensured that parliamentary standing committees (including PAC) were formed immediately after the parliament was installed in 2009. The independent evaluation also noted that the project assistance had helped to reduce the backlog of C&AG reports in the PAC and increased its active role in recommending corrective actions to ministries based on these C&AG reports.[58]

5.15. DFID supports C&AG as part of its FMRP, launched in 2002, and predecessor projects. This support is captured in the FMRP component purpose: "*C&AG publishes improved timely and focused commentary on integrity of fiscal information, and propriety and effectiveness of public expenditure by June 2009"*. Evidence over the 1992-2006 period shows that the content, relevance and timeliness of audit reporting have improved. The auditing process has also been streamlined. Yet, the coverage of auditing (which was not targeted in FMRP) has not improved and less than half of total expenditure is audited every year. The FMRP impact assessment[59] concludes that the auditing and reporting process followed by the C&AG remains "*largely symbolic rather than fulfilling an effective constitutional role in holding the government to account*". The absence of parliamentary scrutiny of external audit reports was identified as a major drawback and the independence of C&AG was questioned.

5.16. There were positive results with RIRA: this project was successful in achieving its objective of establishing fully operational Large Taxpayer Units, as well as strengthening the performance of the Central Intelligence Cell (partly driven by caretaker government's focus on AC). For example, the Cell collected an average of around GBP 11 million from pursuing tax evasion cases between 2004/05 and 2006/07, plus an additional GBP 3.8 million in 2007/08 by the stage the project completion report was written.[60] However, an impact assessment also commissioned by DFID concludes that the reform programme was by nature too small for it to have an impact on the revenue/Gross Domestic Product yield (the project goal). The Bangladesh tax administration system is described as lacking transparency and poorly managed, in part because of "*antiquated, convoluted and opaque*" tax laws.[61] This again indicates the need to twin specific institutional support with support, or demand, for policy reforms.

Civil service reform

5.17. Since independence, progress in civil service reforms has been extremely slow in Bangladesh. Numerous reform committees and commissions, including the Public Administration Reform Commission (PARC) in 2001, were established under successive governments to advise on civil service reforms. Although the momentum

57 Nelson, S. 2006. *Final Evaluation Report, Strengthening Parliamentary Democracy*. Thailand: UN.
58 The report notes further that PAC under the 8th Parliament (2001-08), met 46 times and produced three reports. This allowed it to handle 149 audit objections on 15 ministries, and ordered the collection of TK 13,154 million. Only 5% of this was collected, illustrating the lack of enforcement capacity as a continuing constraint to effective parliamentary oversight. (p. 11).
59 GoB and DFID. 2007. *Assessment of the Impact of Financial Management Reforms in Bangladesh 1992-2006*. Dhaka.
60 RIRA Project Completion report, March 2008.
61 NBR and DFID. 2007. *Reforms in Revenue Administration Project*. Impact Assessment. Dhaka.

for reforms increased temporarily in the years of the caretaker government, PARC's recommendations are still used as the main reference for government action today.

5.18. ADB and DFID support civil service reforms in very different ways and with different entry points. Both programmes are relatively recent, and none of the five commissioning donors provided support to civil service reforms between 2002 and 2006.[62]

5.19. ADB can claim some success in pushing for relevant reforms during the period of caretaker government. One of the objectives of the ADB GGP was to promote a transparent exam entry system to the Bangladesh civil service working with the PSC. The subsequent reconstitution of the PSC and the revision of the exam system, coupled with computerisation, was said to have helped to improve transparency in the civil service exam entry system and with it, reduced opportunities for cheating.

5.20. There were two main issues that ADB and the World Bank had yet to address in their support to the PSC at the end of 2009. Firstly, that the PSC is not fully independent and relies on the Ministry of Establishment for staff recruitment.[63] Secondly, that the Ministry of Establishment has shown little signs of wanting to review the existing quota system for entry into the civil service, which gives preference to freedom fighters. This was identified as a risk by the ADB. At the same time, according to the Ministry of Establishment, the ADB TA package has helped them undertake many initiatives, including drafting the new Action Plan (see paragraph 6.27).

5.21. Progress under MaTT2 has been uneven. Training has progressed well and, at the time of the country visit, more than 30 out of 52 Permanent Secretaries had become MaTT alumni who *"now understand how to carry out reforms";*[64] and a total of 87 Performance Improvement Projects[65] (some dealing with corruption issues) had been completed, with 22 in progress.

5.22. Because of its reach and focus, MaTT2 has potentially an enormous influence on civil servants' behaviour and mindset.[66] A study commissioned in 2008 also argues that if mechanisms were in place to pursue, sustain and replicate some of the Performance Improvement Projects, this could make a significant contribution to the GoB's pro-poor agenda.

5.23. Nonetheless, the lack of progress in human resource management reforms – a main component of the programme that seeks to promote merit-based and trans-

62 The then caretaker government requested ADB's support for governance reforms, to which ADB responded with a programme loan for good governance, and there was a four year gap between MaTT1 and MaTT2.
63 System analysts at the PSC have been accused of tampering with the exam system for political purposes (including leaking questions before the exams take place).
64 DFID. 2009. *MaTT2 Output-to-Purpose Review*.
65 MaTT2 uses innovative experiential training, through which small teams of participants design and develop Performance Improvement Projects. These are small, but significant, assignments that demonstrate that with the right skills, experience, and confidence, government officials can promote changes in key areas, including governance, corruption, poverty, education and health. This method of learning has been well received by participants.
66 DFID interview.

parent promotion and transfers within the Bangladesh civil service – led DFID to downgrade MaTT2's performance scoring significantly in 2009.[67]

5.24. The low level of commitment to reforms from the Ministry of Education itself indicates that MaTT2 administrative cadres are only likely to become reform-minded in areas that do not threaten their own vested interests and, or when, they are given a strong mandate from the Prime Minister's Office. Donor-funded training programmes – however extensive and innovative they may be – can only facilitate rather than trigger a change in mindset within civil servants. A 2009 World Bank independent evaluation[68] also concludes that even in the longer-term, donor support for public sector reforms has remained unsatisfactory, noting the lack of impact beyond training interventions and citing resistance to change within bureaucracy and insufficient pressure from government as the main reasons.

5.25. Vested interests explain resistance to human resource management reforms. As confirmed by Foot et al. (2007),[69] *"the power to control the appointment of senior civil servants in the administrative cadre is jealously guarded by the Ministry of Establishment [...]. There are excellent reasons for this jealousy. Mainly this is because certain jobs bring with them the promise of extra-curricular resources"*. In addition, frequent transfers of personnel by the Ministry of Establishment have made continuity of commitment difficult to achieve.

5.26. Furthermore, access to MaTT2 training programmes may have also fuelled patronage systems, because training workshops at home and abroad come with significant 'perks'.[70] A flaw in MaTT2, as recognised after two years of operation, was that only administrative cadres qualified for training. Administrative cadres are the most powerful civil service group.[71] DFID expected them to be best placed to promote reforms in the public sector. Yet this has proved divisive as well ineffective. According to the January 2009 Output-to-Purpose Review, *"There is a critical view that the basis of selection is essentially divisive, by implying that those selected are a privileged elite."*[72] In addition, rivalry between administrative and non-administrative cadres means that the former do not receive sufficient backing from the latter when attempting to push reforms.

5.27. There is also an increasing recognition that unless the GoB is prepared to implement 'now or never' civil service reforms, donor programmes will remain largely ineffective. Although ADB GGP addresses some highly relevant areas of policy reforms,[73] the corresponding policy triggers are relatively soft and largely consist of circulating information and issuing guidelines and circulars. Yet, donors seem to achieve better results when taking a harder stance: during our country visit, donors, including DFID, insisted that it was time for the GoB to take action. In response, the

67 MaTT2's output-to-purpose scoring reduced from 2 *(likely to be largely achieved)* in 2008, to 4 (*unlikely to be achieved*) in 2009.
68 Verulam Associates Ltd. January 2009. *Governance Assessment Bangladesh Country Assistance Evaluation*. Independent Evaluation Group, World Bank.
69 op.cit.
70 Interview with Helm, MaTT2 implementing agency, notes that a significant proportion of MaTT2 budget was spent on overseas training.
71 MaTT2 is now planning to widen training to other civil service positions such as Director Generals and senior staff of agencies and directorates.
72 DFID. 2009. *MaTT2 Output-to-Purpose Review*.
73 Including strengthening internal audits in Medium Term Budgetary Framework ministries, setting up grievance handling mechanisms and implementing the submission of declaration of assets and wealth statements.

Ministry of Establishment produced a working paper in late 2009, highlighting a future action plan over 6 to 12 months.[74]

5.28. An evaluation for the World Bank concludes:

- *DFIDs long term support [...] has tried to shift from a training based approach to a broader human resource development model but has not been effective. Meanwhile support for more traditional training based models has been provided by others. This experience confirms the self-evident conclusion that the civil service will not reform itself but again the failure to link these technical incentive based models to policy level change has weakened both approaches.*
- *Donor interventions have been insufficient to achieve change or have relied naively on the political will of an outgoing regime and a progressive but temporary and aptly named Caretaker Government. Given the nature of the problems, their scale and complexity, a 'quick fix' remains as elusive as it was in the early 1990s.*[75]

Justice and police

Justice

5.29. The justice sector has been at a low point in terms of authority, independence, corruption, oversight and capacity, and *"stands out as one sector where the signs of deterioration outweigh any improvements".*[76] Although the Constitution explicitly provides for an impartial and independent judiciary,[77] the process of separating the judiciary from the executive effectively started with the caretaker government. The caretaker government amended rules relating to the appointment, posting, discipline and removal of the judiciary; properly constituted the Judicial Service Commission;[78] set up a Judicial Service Pay Commission; and amended the Code of Criminal Procedure to give effect to the separation in the subordinate courts. The current government has since reversed some of this progress, giving back some judicial powers to executive magistrates.[79] The GoB's Strategy for Legal and Judicial Reforms (2000), which was designed as a 10-15 year road map for capacity building and reform, appears to have been abandoned.

5.30. Support for justice sector reforms from the five commissioning donors is found in the ADB GGP (Output 2) and the Danida Human Rights and Good Governance Programme, Component I: Access to Justice.

5.31. One of the objectives of the ADB GGP was to "*support judicial reforms with a focus on the performance, transparency, and accountability of the judiciary, particularly on its role in the anti-corruption agenda*." The purpose therefore specifically

74 This included the formulation of a Civil Service Act; the finalisation of policies related to promotion, transfer and placement; improving personnel database management system; developing performance-based evaluation system, reforming field administration; renaming and re-defining the role of the ministry; and clustering ministries.
75 Verulam Associates Ltd. January 2009. *Governance Assessment Bangladesh Country Assistance Evaluation.* Independent Evaluation Group, World Bank.
76 Institute of Governance Studies. 2006. *State of Governance Report 2006.*
77 *The Constitution of the People's Republic of Bangladesh*. 1972. This provides for the separation of the judiciary from the executive. Chapter 1 establishes a judicial system in which the subordinate courts are accountable to the Supreme Court and not to the executive.
78 The Judicial Service Commission had been created in 2004 but not constituted in accordance with the Masder Hossain judgement/
79 Although the caretaker government ordinance all but abolished executive magistrates, restricting their jurisdiction to administrative public order duties, the current government has amended rather than ratified this ordinance, giving back some judicial powers to executive magistrates. There are claims that these powers are open to abuse by the executive and are often poorly executed resulting in miscarriages of justice. The matter is currently in the High Court on an application by Human Rights and Peace for Bangladesh. *Judicial Power of Executive Magistrates Questioned*. Retrieved 3 May 2011 from www.bdnews24.com/details.php?cid=2&id=147032

addressed the prosecution of corruption in addition to the integrity of the judiciary. More specifically, Output 2 sought to support the independence, professionalism, transparency and resourcing of the judiciary through changes to the legal and policy framework, incentives, physical and human resources, support to the Judicial Service Commission in recruitment and more thorough implementation of the Judicial Code of Ethics. The output also sought to support the government in establishing an independent prosecution service.

5.32. The ADB GGP has been effective in establishing the beginnings of a culture of greater openness in the judiciary. Yet lasting results are unlikely without sustained government actions, some of which are missing from the ADB GGP loan conditions. Two examples are given here.

5.33. On promoting transparency within the justice sector, the ADB GGP loan condition in respect of annual public reporting on the inspection of the courts has been only partially effective. The publication of the 2007 Supreme Court Annual Report was achieved on time and contained full reporting on the performance of the subordinate judiciary and the Supreme Court. This event was sufficient to fulfil the ADB loan condition and contribute towards triggering the release of the second tranche of the loan. The 2008 Supreme Court Annual Report, however, contained no reporting on the performance of the subordinate judiciary.

5.34. The Supreme Court Directive requiring strict implementation of the rule on submission of declaration of assets and wealth statements was a condition of the ADB loan, and submission of wealth declarations has been required from the subordinate courts since 2007. Compliance rates have been high (98% in 2007 and around 90% in 2008).[80] The reports are scrutinised and investigated if necessary by a committee chaired by the Chief Justice. The system has the potential to set a good example in the national fight against corruption and to improve public confidence in judiciary. Further actions are required, however, to ensure that the scrutiny of reports and subsequent disciplinary actions, where needed, are transparent and predictable.

5.35. These two examples show that promoting transparency and accountability within the judiciary has not received sufficient government attention. Furthermore, despite being widespread at all levels of the justice sector, there have been no prosecutions of justice sector officers by the ACC (in part because its preliminary focus has been on political figures) and very few judges have been dismissed for corruption.[81]

5.36. In the ADB Country Assistance Programme Evaluation,[82] ADB support was judged to have made modest gains in separating the judiciary from the executive branch. Looking at risk, the new (post-caretaker) government failed to ratify the Supreme Judicial Council Ordinance (passed by the caretaker government to sup-

80 2009 declarations were due to be submitted in December 2009.
81 Stapleton, A, Moran, G and Hossain, S. 2007. *Joint Assessment of Prospects for Harmonisation within the Justice Sector in Bangladesh*. Commissioned by the Justice and Human Rights Working Group of the Local Consultative Group of the Development Partners in Bangladesh. Funded by CIDA, DFID-World Bank Trust Fund, Danida and GTZ.
82 ADB. 2009. (paragraph 205).

port a neutral, transparent body that would be responsible for nominating judges to the Supreme Court). This has been identified as one of two potential setbacks to reform.

5.37. To fight corruption effectively, the judiciary must be independent, impartial and effective.[83] ADB attempts to support judicial independence contribute to the first two conditions, as do its support to an independent budgetary allocation for the judiciary but, as its support was focused primarily on governance, little improvement in the effectiveness of the judiciary can be seen (see paragraph 6.38 for notes on the Danida TA). Case backlogs are still a serious issue for example. Efforts to support an independent prosecution service, required in support of the judiciary's effectiveness, have foundered with the current government declining to ratify the Permanent Prosecution Service Ordinance passed by the caretaker government.

5.38. Support from Danida has been in the form of TA to the ADB GGP in the Supreme Court Registry and in support to the Judicial Administration Training Institute. Progress towards one of the long term goals – namely, *the formal justice system is efficient in terms of case management and ensures fair treatment for all peoples* – was not possible to evaluate: "*The number of trained judges has been in line with the pre-established yearly target, but it is not possible at this stage to evaluate the national level impact of this training in relation to the objective."* (Annual Progress Report 2008-09). This objective has been noted as ambitious given the scope of the programme.[84] Elsewhere, the programme has supported the establishment of "*practical and realistic monitoring and reporting protocols*" in the Supreme Court. The Supreme Court however, requires further support to strengthen its ability to collate and effectively use data.

5.39. The support by Norway, Denmark and DFID to BLAST has also seen some effectiveness in strengthening the monitoring role of the justice system and increasing the demand for accountability:

> *BLAST has also successfully challenged arbitrary action by state actors, and has brought in places more effective scrutiny and monitoring by the judicial process of the actions such bodies, and has required officials to comply with their constitutional obligations, for example in exercising their power of arrests and remand, or consumer protection, or provision of adequate housing to the poor.*[85]

Police

5.40. "*Reform and renewal of the Bangladesh Police will take time. It is under-resourced, lacks capacity and is still based on a colonial, public order model*."[86] DFID (with UNDP) is investing that time with Phase I (2005-08) and Phase II (2009-15) of the Police Reform Programme. The programme has demonstrated progress in all outputs albeit to varying extents.[87] Independent evaluations indicate that the programme is effective and achieving results but point out that without government

83 This of course does not apply only to the hearing of corruption cases.
84 Danida. September 2009. *Human Rights and Good Governance Programme Phase II, Annual Progress Report 2008-09.*
85 Final Project Report, October 2009. (p. iv).
86 Police Reform Programme, Revised Project Support Document, May 2004.
87 2008. *Output-to-Purpose Review*. (p. 2).

commitment to "*modern legislation and regulations which will flow from it, it is unlikely that the project purpose can be fully achieved*".[88]

5.41. The impact of the programme on reducing corruption in the police in Bangladesh is difficult to judge. The follow up Public Attitudes Survey carried out in 2008 showed a dramatic reduction in citizens' perception of corruption in the police compared to baseline survey results. This included a reduction in the incidence of offered or paid illegal incentives to police. It is not clear, however, how much of this success is due to the impact of the programme and how much is due to the conducive environment under the caretaker government.

5.42. The programme has also been effective at increasing the quantity and quality of public reporting in the Bangladesh police force. The programme set up a reporting structure of annual reports, work plans and progress reports that are publicly available on the Police Reform Programme website[89] as is the first ever Strategic Plan (2008-10). Performance data collected is also reported publicly.

Support for elections

5.43. Since the end of the authoritarian rule in 1990, four parliamentary elections have taken place – in 1991, 1996, 2001 and 2008 – with a military-backed interim caretaker government for two years in 2007 and 2008. Interest in electoral reform dates back to 1996, when a few indigenous NGOs, with donor support, led by The Asia Foundation emerged with attempts to facilitate transparency in the electoral process.

5.44. During the period 1996-2001 when a lack of transparency in the electoral process appeared to be ingrained, UNDP, other development partners and many indigenous NGOs stepped up their initiatives to ensure voters' awareness and transparency in acceptance of election candidatures and voting processes. Working since 2001, the The Asia Foundation Election Working Group programme has been successful in introducing a systemic methodology of transparent monitoring of electoral corruption by way of participation of the government, civil society and the development partners.

5.45. The success of support for the 2008 elections shows that strong leadership (the USA in this case) and coordinated donor support at a time of consistent government policy can be effective in pushing through important reforms.

5.46. In the run-up to the 2008 election, the 36 month project PERP was initiated with support from Denmark, DFID, Norway and Sweden. It was scheduled to be completed by June 2010. Reports document effective performance, especially in delivering a comprehensive electoral database. The *Annual Report 2008* reveals that the monitoring mechanism adopted in the project to help prevent corruption worked well and has the potential for future continued success. The reports on

88 Purpose: *To develop a safer and more secure environment based on respect for human rights and equitable access to justice through policing, which is more responsive to the needs of poor and vulnerable people.* Police Reform Programme DFID Summary Review. June 2008.

89 Police Reform Programme. Retrieved 3 May 2011 from www.prp.org.bd

elections held using the new electoral roll and their acceptance by contending parties is an indicator of a partial move towards acceptance of free and fair elections.

5.47. The same report details specific benefits of inclusion regarding the participation of women, eligible voter children, the poor, people with physical disabilities and ethnic minorities, and significantly demonstrates that the project has dealt with certain forms of election-related corruption affecting poor people and women.

5.48. In the case of the PERP, NGOs were directly involved in ensuring that a comprehensive registration of all eligible voters was made. Consultations were also held with religious leaders who participated in the project aimed at encouraging Muslim female voters wearing *Hijabs* to participate freely in the experimental voting to test the acceptance and validity of the newly-designed voter list.

5.49. In December 2008, the Awami League-led coalition won the general election by an overwhelming majority. The incoming cabinet contained five women including the prime minister, home and foreign ministers. Parliament convened on 25 January 2010 and, despite criticisms, the opposition joined parliament and actively participated. On 22 January, elections were held in 481 Upazila's (sub-districts) in rural areas where councils were elected for the first time. At national and local levels, the elections were contested in an open way and given the development partner support in registration and photo-identity voting cards. The general perception was of a more free and fair process than before.

Peoples' participation

5.50. The leading CSO working specifically on corruption is TIB (supported by the UK, Norway and Sweden). Their Making Waves programme has, after a slow start, begun to show positive outcomes with a growing network of CCCs challenging corruption at a local level in government administration and service delivery. Its higher profile national work helped break the media's reluctance to openly report and discuss.

5.51. The TIB Making Waves project, through the CCCs, has created a mechanism through which the people at the grassroots in Bangladesh can channel their opposition to corruption.[90] The TIB project has a strong focus on the involvement of the community in AC activities. The goal is more accountable government at all levels and the purpose is to increase demands by men and women for transparency in public, non-profit and private sector transactions. This was achieved through local CCC AC campaigns in service sectors of education, health and local government. Young community members form Youth Engagement and Support groups also participated in the campaigns and demands for action to improve public services.

5.52. The TIB project has also facilitated dialogue between the public and government officials to enable grievances to be aired and remedies to be sought. Advice and Information Centres operating at the CCC level provide relevant information on the services enabling service recipients to raise issues with the relevant authorities

90 Knox and Yasmin. 2007. *TIB Impact Assessment Report*.

at the point of service. By empowering people with information and knowledge on the issues in service delivery at the local level the project aims to build capacity to demand and access public services.

5.53. Importantly, the project collects citizens' assessments of public services through the use of score cards. The project has used these findings combined with national level research to successfully advocate for policy and institutional reforms to reduce corruption.

5.54. In conclusion, the project impact assessment clearly indicates achievements in mobilising people to demand action against corruption. The overall impact can be seen through evidence of positive changes in, for example, service delivery in educational institutions and in local health complexes. There is increased attentiveness of service providers to the newly acquired critical oversight of the service receivers, evidenced by their active presence at their place of work during office hours.

5.55. The continuity of donor support to TIB coupled with their support to other CSOs engaged in strengthening participation of society in improving accountability and transparency in Bangladesh was essential.

5.56. Another effective project is DFID's support to SAMATA. This project does not address AC specifically but entails community empowerment through participation and monitoring. An independent impact assessment carried out in 2007 points to the programme being effective and achieving results, leading to substantial reductions in extreme poverty in its programme area. Results were also documented in two key areas:

- increased public reporting of plans, budgets and progress reports by the 55 Union Parishads directly supported[91]
- a reduction in the incidence of payment of bribes by the poor (including poor women) to access basic services such as education, health and family planning in the target groups.[92]

91 SAMATA Project Completion Report. 2008.
92 Project Completion Report. 2008. (pp. 3 and 6).

6. Tackling corruption in the primary education sector

Summary of key points about the education sector

- Comprehensive analysis available from diverse sources informed programme design to tackle corruption in the sector.
- Notwithstanding a programme-based approach to donor support, corruption issues are not yet addressed in a cohesive manner.
- Openness of dialogue with government about specific financial and governance issues has improved, following the set-up of a governance review committee.
- Strong arrangements for independent audit and a united response by donors to early problems have led to improving and positive financial management.
- There are signs of progress in some areas – notably teacher recruitment and school governance.

6.1. Improved performance in education is a high priority of the GoB, through its commitment to Education for All and the poverty reduction agenda in the Millennium Development Goals. This chapter deals with how donor support[93] to primary education through PEDPII has sought to address corruption in the sector.

Corruption in the sector

6.2. Good results have been achieved post–independence, with the primary education net enrolment rate rising from 72% in 1980 to 91.1% in 2007. Yet, despite these positive achievements, the education sector in Bangladesh has also suffered from endemic corruption, with direct detrimental effects on the poor.

6.3. Corrupt practices in education are increasingly well documented, in part due to donor support. Analysis of media reports by TIB in 1997 and 2000 showed education to be the third most frequently reported sector for corruption. Embezzlement and extortion accounted for 49% of reported cases; misuses of power for 22%; negligence of duty for 11%; bribe taking for 9%; and misuse of resources for 7%. According to the same study, some 35.5% of education service recipients report being forced to pay a bribe for admission; 32.5% to be enlisted for a stipend in primary school; and 54.1% for actual disbursement of the stipend.

6.4. A number of studies produced in subsequent years showed mixed success in fighting the main forms of corruption in the education sector.

93 A total of 11 development partners finance PEDPII.

6.5. In 2002/05, the C&AG found continuing evidence of weak payroll controls in the Ministry of Primary and Mass Education (MOPME) and systemic weaknesses over procurement, where the ministry was not properly applying the Public Procurement Regulations 2003. Issues with stipends were also raised as observations in audit reports for the period 2002-5, but since 2006, the situation improved. Two rounds of Social Sector Performance Surveys in 2004 and 2005 also confirmed a mixed picture:

- Government expenditure records appear overall consistent, which suggests that the public and donors can often rely on government accounts for a reasonably accurate view of the distribution of resources.
- Specific areas for concern were the stipend programme (17% and 34% of students that received stipends in Classes 7 and 8 respectively were reported ineligible) but this was an improvement on earlier findings.
- Distribution of textbooks to primary schools was effective.
- Speed payments were widely reported by education offices in order to receive travel allowance and other processes including appointments and promotion.
- Over 20% of primary school parents made an informal payment at some point during the student's education (for textbooks, admission, etc.) totalling between 2% and 8% of household spending on education (Oxford Policy Management, 2008).

6.6. Although there was a delay before the GoB would acknowledge the findings and approve publication, these two social sector performance surveys were a significant factor in raising the debate and benchmarking the challenge being faced.

6.7. Notwithstanding continued weaknesses, donors agree that recent years have witnessed some evidence of progress in dealing with certain forms of corruption within the education sector. A long-running independent panel study in nine villages across rural, peri-urban and urban locations supported by Sida[94] reported in 2009 that:

- Stipends were better organised than the previous year, but the criteria for award are regarded as least achievable by the poor.[95]
- School textbooks were supplied in time and in planned quantities in 2009.
- School Level Improvement Plan operations varied but local decision-making and the inclusion in committees were appreciated.

6.8. Furthermore, a survey by the IGS in 2007 indicated that 70% of the general public had seen an improvement in the state of public education, with this sector being perceived as the least corrupt public service (including health).

6.9. There is at the same time ample evidence that corruption persists in this sector. For example, a separate independent study undertaken by TIB in 2008 confirmed many of the conclusions of the social sector performance surveys, with corruption in the education sector often relating to the distribution of stipends, the collection of fees/subscriptions from students, buying of teaching-learning materials,

94 Sida. 2009.
95 The issues of stipends were raised as observations in audit reports for the period 2002-5, but the situation has been improved since 2006.

and corruption in the recruiting and training of teachers. Corrupt practices and irregularities were reported to take place at school level and administrative level (i.e. Upazila Education Office).[96] A review of Education for All by the World Bank undertaken in the same year also reported continued irregularities in textbook production and distribution in Bangladesh. The report further highlighted that corruption in procurement had resulted in the poor quality of school construction.

Impact on poor people

6.10. The poor are most directly affected by corrupt practices in the education sector – in Bangladesh, access to essential services such as education, in common with health, justice and individual safety, has become a function of the capacity to make unauthorised payments. Poor education sector governance and its subsequent impact on education inequality is driven by two main factors in Bangladesh: capture and bias (Goetz and Jenkins, 2005, reported in Al-Samarrai, 2008).[97] Goetz and Jenkins identify three main areas where capture has a greater impact on the poor and may lead to widening inequality:

- Where corrupt practices lead to the diversion of resources, the poor are less likely to be in a position to substitute their own resources for misappropriated government resources. For example, non-poor households are more likely to be able to afford private tuition to substitute for unauthorised teacher absence compared to poor households.[98] Poor households also have fewer exit options from the government supported education system and will therefore be more affected by declines in access and quality associated with corruption.
- The poor are in a weaker position in society as a whole compared to wealthier households and this makes it less likely that they will resist and expose corruption in the education sector, especially if they have to act individually. This lack of power also means they are more likely to face informal payments to access education services.
- Capture strengthens the position of local elites because they are often the direct beneficiaries. This tends to further reinforce the wide differences in education and livelihood opportunities of the poor compared to the non-poor.

Project objectives and links with anti-corruption

6.11. The original PEDP programme document (ADB, 2003) does not have an explicit analysis of corruption. The programme document nonetheless notes that *"the possibility of corruption has also been addressed. PEDPII includes measures to ensure better governance and efficiency in system performance, and transparency in financial and procurement management*." (Ibid. paragraph 73).

6.12. PEDPII has a total of four components:

1. quality improvement through organisational development and capacity building, with emphasis on increasing authority and accountability, including good gov-

96 TIB. July 2008. *Administration and Management of Primary Education: Problems and the Way Out*.
97 Capture is closely related to corruption but includes pressure faced by public officials to act illegally even if they do not directly benefit. Bias relates to anti-poor decision-making that leads to the exclusion or disadvantage of the poor and other marginalised groups.
98 In Bangladesh, primary school students from the wealthiest households are between two and four times more likely to pay for extra tuition compared to the poorest students (FMRP, 2006).

ernance and the need to address fiscal and supervisory irregularities in the sub-sector

2. quality improvement in schools and classrooms

3. quality improvement through infrastructure development

4. improving and supporting equitable access to quality schooling.

6.13. Two strands of arrangements can be identified. First of all, PEDPII adopted a strong approach over strengthening procurement and financial management from the outset. A key feature in the process of quality improvement in primary education is the principle of decentralising and devolving authority and responsibility to middle and local levels of the education system. The implementation of local procurement through local competitive bidding, designed to support decentralised financial management under PEDPII, was planned to follow the (then) new Public Procurement Regulations 2003. In addition, the approved policy and institutional reform framework included measures to enhance transparency in financial management, including the use of public expenditure tracking surveys. Unusually, the programme elected to appoint external auditors as well as using the government services.

6.14. Secondly, there is a less explicit but nonetheless relevant set of arrangements, dealing with school management. To enhance the participation of parents and the community during implementation, emphasis was to be on capacity building and active involvement of the Parent Teacher Association and the School Management Committee in school management and planning. PEDPII put particular emphasis in their role to increase the accountability of teachers, and thereby "*to improve attendance and lower the dropout rate*".[99] In addition, the role of local government (Union Parishad) in the local-level education system was to be strengthened by forming an education committee at the Union Parishad level.

6.15. The design and implementation arrangements of PEDPII were found to be deficient in two areas of concern regarding corruption. First, textbooks remained the financial concern of only one donor, the World Bank, and remained the responsibility of an autonomous body, not under the direct control of MOPME. Similarly, the Stipend Program for Primary Education is not managed under PEDPII but handled by a different Project Liaison Unit that does not participate in coordination meetings with PEDPII.

Effectiveness in implementing anti-corruption efforts

6.16. Measures introduced to ensure transparency in the programme's financial management worked to the satisfaction of both the donors and government: when the audit report for 2003/04 found evidence of collusive activity at local levels, the donors took a firm stance and after investigation, insisted on return of their funds,

99 Gender was taken into account through plans to reserve places for two mothers out of five representatives from the parents plus one female representative from the union council/municipality in the School Management Committee. The Parent Teach Association was to include 3 mothers out of 5 representatives from parents. So-called courtyard meetings of mothers and school visits by mothers were to be strengthened under the social mobilization activities of the PEDPII.

reportedly around US$900,000. The GoB also blacklisted the concerned company for 3 years.

6.17. Whilst the Project Liaison Unit provided an effective platform for dialogue over implementation management, donors initially shied away from discussing broader governance issues in the education sector with the MOPME/Department of Primary Education. Part of the problem was that the GoB was reluctant to engage in discussions about governance in the sector at the start of the project and managing that process proved difficult for the donors: a governance study in 2003 looking at how to manage financial and governance risks was reportedly never adopted by government.[100]

6.18. Some donors expected more engagement in the areas of policy and governance, which the Project Liaison Unit did not bring. The subsequent creation of a fifth working group dealing with governance is regarded by some respondents as an effective response to shortcomings in the unit. The 3rd Joint Annual Review Mission (JARM) Aide Memoire, indeed, noted that MOPME/Department of Primary Education had taken important steps to improve governance by combating corruption, financial irregularities and rent-seeking in the primary education sector.

> *As follow-up to the decisions made at the JARM 2006, it is agreed that Department of Primary Education's Governance Review Committee and the development partners' Governance Working Group will continue to work jointly to further address governance issues. Identified themes are (i) teacher recruitment and deployment, (ii) managing innovation grants, (iii) streamlining procurement, (iv) implementing School Level Improvement Plans, and (v) information dissemination. External validation of the achievements is important in this respect, and results can be used for external communication.*

6.19. Donors reported continued satisfaction over governance issues in subsequent years. In 2007, the Mid-Term Review Aide Memoire, noted:

> *Department of Primary Education has made important achievements in governance actions, identified key challenges being faced and realistic ways forward to establish good governance in the sub-sector. A draft Governance Report will be finalized and approved by MOPME as soon as possible.*

6.20. In 2009, the JARM further reported the following improvements and positive developments:

> *a) selection and recruitment procedures of teachers have become more transparent; b) more reliable basic data are available, enhancing more effective risk mitigation strategies and tools; c) well documented cases of corruption and collusive practices were extensively discussed as part of the policy dialogue between GoB and DPs, resulting in more serious sanctions; d) the number of audit observations has decreased.*

100 Wood, J., Abdul Hye, H., Shrivastava, A. 2003. *Developing a Risk Reduction Strategy on Financial Management and Governance in PEDPII.*

6.21. The above statements confirmed that whilst the direct language of corruption has remained muted, there is a significant change in detail and plain-speaking. Donors report that processes are getting more transparent, but still not necessarily dealing with issues head-on. These statements also confirmed that despite continued weaknesses, change has occurred, albeit slowly. Sufficient progress has been made for the 5th JARM in 2009 to highlight four key areas of achievements that have longer-term implications:

6.22. **Recruitment of teachers:** Government has made good progress in recruiting teachers in government primary schools through an improved and transparent recruitment process, which has resulted in more female teachers (from 50.2% in 2005 to 58.2% in 2008, with a target of 60%) and more teachers with higher qualifications.

6.23. **Monitoring and evaluation:** A results-based management system is being institutionalised at the Department of Primary Education/MoPME to strengthen systematic data collection, analysis and reporting with a focus on the results of PEDPII. This comprehensive reporting tool has a balanced set of 13 indicators at purpose and goal level with a baseline in 2005 and several years of data. It is a big contribution to fostering internal M&E but at the present time does not include any indicators about governance or the effects of corruption.

6.24. **School management:** Donors also note a definite improvement in management at school level. Importantly, school-level improvement plans have started to take off from the financial year 2008-09, with a coverage of around 39% (23,773 schools) of the total schools administered by the Department of Primary Education/MoPME by June 2009. This mechanism provides an opportunity to address quality and equity at the school level through the active involvement of Parent Teacher Associations and School Management Committees to support schools, monitor progress and ensure the transparency of fund utilisation. This will help foster a culture of openness and transparency.

6.25. **Audit observations:** An analysis produced by FAPAD in September 2009 confirmed a relatively low level of observations, though a downward trend is not clearly evident (PEDPII Project Liaison Unit 2009). Elsewhere, the strict approach to looking at school level construction through the Local Government Engineering Department, which took time to train engineers, seems to have started to pay off with reduced collusion at tendering, although concerns about the quality of construction still remain.[101]

Lessons and issues

6.26. The 2009 ADB country evaluation rated support to basic education as having substantial impact and overall as successful, though in the narrative noted that the "…*program will likely be effective at delivering the intended outputs and outcomes, especially those related to equitable access to education. The program, however, is less likely to significantly raise the quality of education and strengthen institutions*".[102]

101 On the basis of interviews with donor education advisors.
102 ADB. 2009. *Country Assistance Program Evaluation, Bangladesh*.

Donor persistence, solidarity and resolute action

6.27. The 2002 Drivers of Change analysis[103] sponsored by DFID argued that three features of donor approaches exacerbate the situation regarding poor governance: lack of persistence, lack of firm solidarity among donors and lack of a collective donor willingness to suspend aid when faced with government backtracking on major governance reform commitments. (Duncan et al. 2002, p. 18) The arrangements for PEDPII directly tackle those criticisms.

6.28. Firstly, because the focus of the project has been educational performance rather than corruption, governance has been seen as a means to a long-term end that is mutually shared by development partners and the GoB. Bringing the issue of corruption to the fore was seen as a positive move: donor views and reactions can be used by bureaucrats as a defence against other pressures to do the wrong thing.

6.29. Secondly, the joint review mechanism and single implementation office have helped create donor solidarity. At the start of the programme, all development partners signed a code of conduct which among other things, specified one monitoring system, one reporting system, and an obligation to share information about other projects.[104] This has worked well, even though interviews with donors reveal that some partners appear to be more dedicated to commitments under the Paris Declaration than others.

6.30. Thirdly, at an early stage in the project, the donors took a firm stand over corrupt practices. PEDPII represents a transition from projects to programme. Multiple projects are too hard to track – and moving to one operation has made monitoring easier and stimulated a desire by government to sort fiduciary matters. At the same time, the view by the GoB is that donors still pressurise to achieve speed of spending and as a result are inclined to overlook things.

The sector still lacks a common vision of improved governance

6.31. Although there has been sufficient agreement around education objectives there is no common vision over governance in the sector. This is reflected in the separate arrangements for managing stipends and text books, which were kept out of PEDPII, yet are critical factors in the success of the programme. Respondents in the Department of Primary Education/MOPME also felt that closer control, such as over procurement, was acceptable for better performance. One task for the 2010 Joint Review Mission was to follow up the governance report and create a process to set a vision. As noted, there are no governance indicators in the logframe or the results-based management system, and this must be a key objective for the next phase of support for the sector.

103 Duncan, A. et al. 2002 *Supporting the Drivers of Change.*

104 Despite a joint approach, analysis of performance can differ widely. For example, DFID Bangladesh report that in 2006, they rated PEDPII a 4 (*Purpose likely to be achieved to a very limited extent*) in their annual Output-to-Purpose Review, at the same time as ADB was referring to the project as a good practice example.

7. Conclusions

7.1. This evaluation has found a high degree of relevance in the donor-supported programmes. They are generally well founded on analysis of political economy and corruption, athough analysis of how AC activities will support poverty reduction and attention to gender dimensions is less consistent.

7.2. All donors have been highly responsive in their discourse to changing government strategy and political will to fight corruption. Only a few, however, have chosen to provide financial support to AC-specific interventions, notably support to the ACC. Donor assistance in Bangladesh is primarily project-based, non-state agents being the largest beneficiaries. ADB's GGP is the most relevant and coherent AC programme. UNCAC ratification helped shape the programme, whereas other projects have scope to create stronger links to UNCAC articles in their design, goals and objectives.

7.3. Table 7.1 summarises donor strengths, weaknesses, opportunities and threats in response to the main terms of reference questions.

Table 7.1: Conclusions of the evaluation

Key terms of reference questions	Conclusions of the evaluation
How effective have donor interventions been in fostering institutional M&E mechanisms to fight corruption? (parliament, civil society, etc.)?	The main donor attempts to foster institutionalised M&E mechanisms to fight corruption in Bangladesh entail support to parliament, support to the C&AG and support to CSOs monitoring government, the latter ranging from monitoring service delivery at grassroot level, to conducting public expenditure tracking studies. The main strength of Denmark, Norway, Sweden and the UK support in this area has been their continued support to TIB and other CSOs dealing with advocacy, community participation and monitoring. This report shows that civil society actors and their selected entry points have indeed achieved some interesting outcomes in terms of advocacy, popular pressure to reduce corruption and wider cultural change. The main weakness of donor support has been their failure to link up – and encourage partnerships – between the key check and balance institutions that they support. For example, DFID (alongside the World Bank and other donors) has provided support to the Ministry of Finance, C&AG and (through UNDP) parliament, yet programmes have failed to show tangible results in strengthening financial accountability overall.[105] Similarly, one of the major factors that led to the failure of ACC is the lack of support they face from the legislature, law enforcement agencies and bureaucracy – in large part because these arms of government are often the primary targets for any AC drive in a country.

105 The forthcoming multi-donor Strengthening Public Expenditure Management should provide the right opportunity for donors to adopt a more comprehensive approach to financial accountability in Bangladesh.

Key terms of reference questions	Conclusions of the evaluation
How effective have donor interventions been in fostering a culture of openness and supporting progress in the area of transparency, ethics and public reporting?	Donor support for stronger ethics, transparency and public reporting in Bangladesh has entailed working with the media and research institutions on one hand and on promoting staff integrity within the key government institutions supported on the other. Donor work with the media has remained limited. Support included DFID's 'Sanglap' programme and funding to the IGS. In addition, donors are frequently perceived as lacking transparency in the way they operate. They have not shown any inclination to use the media to come forward with more information on the programmes that they support and are not seen as actively pushing for a strong government commitment to public reporting. Donors' strong stance on improved CSO governance and increased CSO staff integrity is generally welcomed by all stakeholders, as setting a good example of ethics and transparency and strengthening their reputation with the public and donors. Donors have also made some good, albeit still limited, attempts to deal with AC within the Bangladesh civil service and law enforcement agencies. Donor efforts to promote integrity within these key public institutions have taken various forms, from training, to support for internal auditing systems. This includes, as discussed in Chapter 6, DFID's work with the police and MaTT2. In addition, DFID has tried to work with RIRA on reinforcing stronger internal audit mechanisms, but this has largely failed and this component of the project has been dropped. There was a general concern voiced by interviewees that donors' own internal pressure to spend may play against their zero-tolerance to corruption, and with it, lead to lower demands on promoting AC prevention measures within public service.
How effective have donor interventions been in dealing with the forms of corruption affecting poor people and women in particular?	In Bangladesh, donor attempts to deal with the forms of corruption affecting poor people and women are primarily found in their support to ACC and TIB and within social sectors (such as education). This has shown that, with the right monitoring and advocacy tools and adequate access to information, community empowerment can succeed. Despite being identified as highly relevant, ACC Duprak have nonetheless remained dormant.

Key terms of reference questions	Conclusions of the evaluation
How effective have donor interventions been in using dialogue as a tool for coordinated donor response in monitoring and fighting corruption?	Political instability has reduced the scope for genuine dialogue with the GoB on high-level corruption. The lack of an effective platform for dialogue was cited as one of the reasons for the lack of broad donor support for the ACC. The reputational risk for donors is higher here than elsewhere, as ACC reforms are often perceived as being closely associated with narrow political interests. Prior to the 2010 Bangladesh Development Forum, donors faced the challenge of coordinating their approach to governance and AC. The lack of donor coordinated support in civil service reforms has meant that dialogue with government has been weak; similarly, there is a lack of joined-up thinking about the justice sector from government and donors. The dominance of a single donor in support of the ACC has also restricted opportunities for dialogue, while also leaving the ADB exposed. In addition, the evaluation finds that donors have not been successful enough in engaging Members of Parliament. This is an important omission from several perspectives. Effective reform requires high level champions to provide political leadership and donors need to be aligned. But also the politicisation of corruption, noted elsewhere, creates potential conflicts of interest as members of parliament seek to influence procurement decisions at all levels, and therefore are themselves potential targets for reform.[106]

7.4. The main conclusion of this evaluation is that, as yet, there are no proven ways to promote AC efforts in a country like Bangladesh. Notwithstanding a long-term engagement and responsive approach to opportunities, donors have had mixed success in demonstrating tangible results in their support to AC in the country.

7.5. The main areas of success have included supporting improvements to the legal framework and in helping to build key institutions that have a role to play in the fight against corruption. This includes changes in practice within the PSC; political processes supported through elections; and setting up revitalised institutions, starting with the ACC. The DFID RISE programme has also been commended for its effectiveness in supporting and increasing transparency and accountability in the institutions it supports.[107] There are also ample examples of CSOs achieving some success through their work at the grass root levels in reducing poverty and, with it, exposure to corrupt practices.

7.6. Corruption in Bangladesh nonetheless remains endemic and systemic. This evaluation shows that donors can only go so far in their support to institutions and processes. It confirms that lasting achievements do not happen without sustained political commitment that transcends a single administration, which in turn raises

106 For the ADB, it could be due to the fact that it is mandated to deal with only non-political parts of the governance.
107 Second Annual Review, June 2009. (p. 8).

issues of impact and sustainability. Furthermore, a generally unstable political situation has meant that some donor programmes have often not been given time to take root and have been slow to effect change. At the same time, donors could still do more to support the fight against corruption in Bangladesh. Their lack of a coordinated and tailored approach to AC in the country, weak project design and mainstreaming of corruption indicators, are all factors that have contributed to reducing the effectiveness of their interventions.

7.7. Chapters 9 and 10 summarise key lessons and prioritise recommendations for donors.

8. Lessons

8.1. This Chapter sets out lessons that have emerged from this evaluation. Some additional lessons identified by different stakeholders are listed in Annex 1.

8.2. Understanding of the political economy is important to appreciate underlying factors affecting corruption. Studies suggest that, in the case of Bangladesh, the scope for change is greatest where it does not affect the patronage system. This can be seen in both positive and negative examples in this evaluation. Progress has been made for example, with people's participation in various ways, including direct efforts to assess public services and indirect in working to increase the participation of parents in school management. In contrast, support for civil service reform has seen less success, with clear resistance to change by the Ministry of Establishments.

8.3. What is interesting for donors is the limitations to the extent of change that can be leveraged from a technical intervention, such as improving the quality of audit. Here, there is scope for progress because patronage is not directly affected at first and a combination of TA and equipment or training can lead to significant improvement in capacity and performance. But the outcomes from improved systems can give rise to information that can be used to challenge patronage, such as findings from audit reports. Donors need to consider if and how they can interact with a wider group of stakeholders, including politicians, to help create an environment in which the benefits from improving technical performance are not lost.

8.4. The experience of the period of caretaker government highlights the risk to donors of responding too enthusiastically to a conducive political environment. Donors, alongside the caretaker government, moved too fast in revitalising a moribund ACC. For the ACC to become more effective, it was necessary to provide complementary support to key partner agencies – the police and judiciary. That approach was partly implicit in the design of the GGP. Yet their requirements were more complex and less suited to rapid expansion. There is still much discord between the various parties and the efforts of the ACC are regularly frustrated by the lack of support. The ACC quickly became less effective after the caretaker government ended.

8.5. The use of a Development Policy Loan as the aid modality for the ADB GGP clearly has the potential to bring efficiencies in the flow and management of funds. But it may not be the best mechanism for a complex governance programme. Development outcomes hinge on changing policies and behaviour to reduce oppor-

tunities for corruption. Given that it is ADB policy for loan tranche release indicators to be set at the level of output delivery rather than outcomes, there is a danger that planned reforms are implemented only to a minimalistic level to secure tranche release without any requirements for progress towards outcomes.

8.6. The good work that has been done with donor support is often not recognised because interventions lack a clear logic with measurable objectives, and insufficent investment is given to establishing baseline parameters and indicators. Mainstreaming AC in wider governance programmes includes having explicit objectives and indicators.

What works and why?

8.7. In the absence of any hard data about project outcomes, no definitive judgements can be reached about the success of interventions in reducing corruption. But some lessons do emerge that can guide donor practice.

People's participation

8.8. Clear benefits have arisen from support to people's participation, both through direct action to increase public demand for accountability through TIB and in the context of managing resources at primary schools. Both approaches were helped by the Bangladeshi practice of empowerment and development of civil society and disadvantaged groups through NGOs. The same approaches might be much less successful in settings where civil society is less used to rights-based action and making demands on public services. An important factor is also that much of the fight against corruption is expressed in a positive approach to improving the quality of public services – which provides a rallying point that can cut across political factionalism and local patronage.

Public financial management

8.9. Support to PFM through audit reforms shows that performance can be improved in technical competence. Audit is an area where international standards and good practice can provide a valuable leverage, possibly though twinning with supreme audit bodies in donor countries. But for better auditing to change government practice, this requires audit reports to be acted upon. Use of audit reports by parliament is important. Some success was achieved in Bangladesh in creating an improved mechanism to establish and run the Parliamentary Accounts Committee, but that has not yet translated into positive action. The use of a combination of government and independent audit in the primary education sector was an effective mechanism for tracking procurement and was used by donors to influence their funding of the project.

Support for elections

8.10. Electoral support illustrates the importance of long-term commitment and the ability to seize an opportunity. Support has been given to raise awareness about voting and the election process since 1996, with a mixed array of UNDP, bilateral donors and national and international NGOs, all of whom shared a common goal. This helped stimulate broad public concern and support for reform. The 2008 election provided a unique opportunity that donors could support with an improved

voter register and other monitoring practices to reduce corruption. The success of support shows that strong leadership (from the USA in this case) and coordinated support at a time of consistent government policy can be effective in pushing through important reforms.

Police

8.11. Reforms that affect the operational practice of the police have demonstrated that change can be managed and can be effective. Donors have been less effective at influencing the GoB to improve the modernisation of laws and regulations. These are necessary to achieve lasting benefits and outcomes in reducing corruption. Technical reforms need to be implemented in parallel with changing policy and legislation.

9. Recommendations for donors

9.1. Programming for AC reforms is very hard and the opportunity for high-level dialogue between the GoB and donors over the evaluation period has been limited. This report identifies the following steps that the international community can make to strengthen their interventions or dialogue with government.

9.2. Making sure fiduciary risks are managed and their money is well spent should remain donors' upmost priority. This sets a visible high standard as an example to other parties and will ensure that donor state and non-state partners are under scrutiny to maintain good governance systems and fight corruption within their own institutions.

9.3. AC objectives need to be stated explicitly in project designs and accompanied by corruption indicators. Too many projects have subsumed corruption objectives into broader governance reforms. The quality of indicators is poor, with insufficient use made of direct measures of corruption. Getting the objectives and indicators right is important during project design as it creates a platform for dialogue with the government when reviewing performance.

9.4. For a policy-based lender like the ADB, the following M&E recommendations are made:

- Plan the policy matrix for the follow-on phase of the GGP (currently being planned) in order to combine evidence of uptake and improved performance from reforms with output measures of policy implementation.
- Revisit the logical framework and develop indicators that reflect changes in corruption with a mixture of objective data about system performance and perceptions from wider society, specific users of government services and civil servants themselves.
- Review the design of the project to ensure that understandings about the effects of corruption on poor people and vulnerable groups, including women, are incorporated into the implementation mechanisms of the programme.

9.5. Donors should prioritise governance, and particularly AC reforms through social sector programmes and develop much clearer expectations, including more specific indicators and explicit discussion during reviews.

9.6. Donors can mitigate the risk of political interference within key AC institutions by working with agents of change further along the accountability chains, from civil society to parliament.

9.7. Donors should prioritise project components that aim at building institutional linkages between key institutions, e.g. from C&AG to parliament and from ACC to justice and police. A sector approach, such as the forthcoming Strengthening Public Expenditure Management Programmes (with funding from DFID, EC, Canada, Denmark and the Netherlands), will not be sufficient in itself to strengthen domestic accountability processes.

9.8. Donors should adopt a tough, yet non-confrontational stance on governance and AC reforms with the GoB. Donors should ensure the government or judiciary commit to 'now or never' reforms, before pledging more support. In the governance sector, there is a risk that donors are spread too thinly, trying to cover everything in piecemeal fashion. This is reinforced by a soft stance on targets or policy conditions.

9.9. Donors need not only to continue support but also be perceived as being interested in the outcome of the work of independent agencies, in countries where political interference could jeopardise their existence. Continuous interaction with agencies such as the ACC boosts morale of the organisation and also sends a message to the concerned government that there is perpetual monitoring of the outcome of a donors commitment.

9.10. Donors' opportunistic/wait-and-see attitude is appropriate tactically, but there needs to be agreement on a joint long-term strategy to support government actions against corruption to guide it.

9.11. A unified voice and consistent message is urgently needed. As the lead donor in AC, ADB should seek to develop a more collegiate way of working to foster stronger donor coordination in support for AC across all sectors, but especially in the civil service.

9.12. Donors could make stronger use of, and focus on, public opinion, even though the link with politics is not quite there yet. Tackling corruption upfront is not always useful and radical actions are not always fully supported by the population. This calls for a more balanced approach between seizing opportunities (such as those presented by the caretaker government) and showing persistence and consistency.

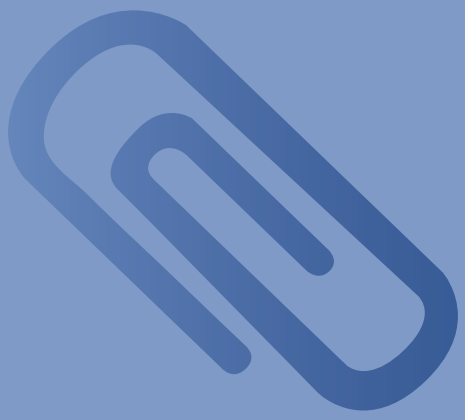
9.13. A focus on changing public attitude and behaviour towards corruption could be more actively encouraged through CSO work (e.g. social accountability, report card mechanisms through the CCCs), local outreach (Duprak committees). Innovative use of media and opening parliament to scrutiny can also help change people's awareness.

9.14. There is scope for more explicit targeting of gender issues and poorer people. As demonstrated by the work of TIB, a demand-led sectoral approach to AC enables a more targeted approach, focusing on gender and poor people. This could be further encouraged in all (economic and social) sectors where donors intervene.

9.15. Donors should build into their loans and programmes arrangements to influence the government towards greater public reporting and transparency.

9.16. Donors should seek to take into account, and if possible develop, the skills and capacity of local or informal institutions in Bangladesh. For example, in addition to strengthening the formal justice system, a focus on community legal services is essential.

Annexes



ANNEX 1:
Definitions, data & survey instruments

Definitions

Working definitions used in this evaluation:

- **Corruption** – "the abuse of entrusted authority for illicit gain".
- Our understanding of corruption versus governance is that an act of corruption is intrinsically linked to a specific transaction between two (or more) parties.
- By contrast, **governance** can be defined as "The traditions and institutions by which authority in a country is exercised".
- It is recognized that donors are increasingly working on a programme basis, but for simplicity Project and Programme are used interchangeably with Project being the default term to describe donor-funded activities.

a) Relevance: Are the approaches employed by the five donors to address corruption (including its negative effects on poor people and women in particular) appropriate to country circumstances, and how could they be made more relevant?					
	Revised questions	**ToR questions**	**Evidence/ indicators**	**Sources of data**	**Data collection tools**
1.	Are approaches responsive to country circumstances?				
	a) Was a state of corruption and political economy mapping and analysis done prior to AC interventions, and if so, what was the quality of this work? Were entry points and major obstacles clearly identified? Were gender and poverty taken into account?	2	Clear references to analysis in programme design documents	Donor programme and project documents	Performance assessment questions 1.2; 1.3
	b) How far did donors use national strategies as well as analytical work carried out by non-state actors to support their choice of AC specific interventions? Were their AC-specific interventions designed in discussion with the government and non-state actors?	3	Clear references to analysis in programme design documents	Donor programme and project documents	Performance assessment questions 1.4; 1.5
	c) Did donor approach to address corruption in the country change over the evaluation period? And did this match changes in the country context?	1	Changes in approach identified from timeline analysis	Donor policy documents Interviews with donor policy-makers and planners	Country context and donor policy timelines
	d) Was the UN Convention Against Corruption used and promoted as a binding legal and political international commitment to further good governance?	5	Reference to UNCAC and structuring of interventions in line with UNCAC articles	Donor policy documents Interviews with donor policy-makers and planners	Donor interview questions
2.	How coherent are donor approaches?				
	a) Have donors been coherent and complementary in their choice of AC interventions? Are there any gaps in terms of funding? Was sufficient attention given to platforms for donor coordination and dialogue with government and non-state actors?	4	Gaps/ overlaps between context analysis and areas of donor support	Donor programme and project documents Interviews with donor planners Interviews with state and non-state actors	Donor mapping Interview questions

	b) How far do donors assess the risk of misuse of donor money across their entire programme? How far did they follow a zero-tolerance policy to corruption?	2	Document-ed analysis	Donor programme and project documents Interviews with donor policy-makers and planners	Performance assessment question 1.8
3.	Are approaches responsive to implementation experience?				
	a) To what extent did donors monitor and evaluate the performance in their AC interventions? What was the quality of the indicators used? Were they in line with national indicators? Were gender and poverty taken into account?	7	Existence of review, monitoring and evaluation documents with appropriate indicator quality and coverage	Donor programme and project documents Interviews with donor policy-makers and planners	Performance assessment questions 2.1-2.5
	b) Have there been changes in the donors' AC agenda, implementation, and result monitoring as a result of observed problems (or success) in the implementation of existing activities?	8	Changes to donor programme composition and content	Donor programme and project documents Interviews with donor policy-makers and planners	Performance assessment question 2.6 Donor interview questions

b) Effectiveness: How effective have donor interventions been in addressing different types of corruption, including forms of corruption affecting poor people and women in particular?

	Revised questions	**ToR questions**	**Evidence/ indicators**	**Sources of data**	**Data collection tools**
4.	How effective have donor interventions been?				
	a) … in fostering institutional monitoring and evaluation mechanisms to fight corruption? (parliament, civil society, etc)?	11	Demonstra-bly function-ing institu-tional systems that are being utilised	Donor programme and project monitoring and evaluation documents Interviews with donor advisors Interviews with state and non-state actors	Performance assessment questions 3.1-3.7 Interview questions Focus group discussions Intervention logic analysis
	b) … in fostering a culture of openness and supporting progress in the area of transparency, ethics, and public reporting?	9, 10	Examples of increasing open, transparent processes and informa-tion	Donor programme and project monitoring and evaluation documents Interviews with donor advisors Interviews with state and non-state actors	Performance assessment questions 3.1-3.7 Interview questions Focus group discussions Intervention logic analysis

	c) … in dealing with the forms of corruption affecting poor people and women in particular?	-	Findings from evaluations Perceptions of stake-holders	Donor programme and project monitoring and evaluation documents Interviews with donor advisors Interviews with state and non-state actors	Performance assessment questions 3.1-3.7 Interview questions Focus group discussions
5.	Within donor organizations, how extensive and effective are preventive measures, such as financial management and control of programmes? What is the burden on country systems?	13	Internal audit findings Perceptions of state actors	Donor audit reports Interviews with state actors	Document review Interview questions Focus group discussions
6.	How effective is dialogue as a tool for coordinated donor response in monitoring and fighting corruption? Have stated intentions with regard to anti-corruption been matched by follow through on implementation, and have intended results achieved?	9, 14, 15	Findings from evaluations Perceptions of stake-holders	Donor programme and project monitoring and evaluation documents Interviews with donor advisors Interviews with state and non-state actors	Interview questions
7.	To what extent are donor actions in line with the current international agreements with regard to harmonisation of aid and the OECD/ DAC Principles for donor action on anti-corruption?	17	Degree of alignment	Donor programme documents	Document review
	Lessons Learned				
8	What do the donors see as the main lessons learned after years of anti-corruption support?	Lessons Learned 1		Interviews with donors	Interview questionnaire
9	What do the national authorities see as the main lessons learned after years of receiving donor support to reduce corruption?	Lessons Learned 2		Interviews with national authorities	Interview questionnaire
10	What do non-state actors including groups representing the poor and women, consider as main lessons for future work to address corruption?	Lessons Learned 3		Interviews with non-state actors	Interview questionnaire
11	What are the main lessons for future work in corruption?	Lessons Learned 4-7		Analysis by evaluation team	Focus group discussions
12	What are the main areas of, and reasons for, success?	Lessons Learned 4-7		Analysis by evaluation team	Focus group discussions Appreciative enquiry
13	What are the main areas of, and reasons for, failure?	Lessons Learned 4-7		Analysis by evaluation team	Focus group discussions Appreciative enquiry

Interview Topic Lists

Donor	Implementor	Non-state actor
1d. Was the UN Convention Against Corruption used and promoted as a binding legal and political international commitment to further good governance?		
2a. Have donors been coherent and complementary in their choice of AC interventions? Are there any gaps in terms of funding? Was sufficient attention given to platforms for donor coordination and dialogue with government and non-state actors?		2a. Have donors been coherent and complementary in their choice of AC interventions? Are there any gaps in terms of funding? Was sufficient attention given to platforms for donor coordination and dialogue with government and non-state actors?
3a. To what extent did donors monitor and evaluate the performance in their AC interventions? What was the quality of the indicators used? Were they in line with national indicators? Were gender and poverty taken into account?		
Does the donor promote systematic studies (such as drivers of change, power analyses), information collection, dissemination, discussion on corruption issues?		
3b. Have there been changes in the donors' AC agenda, implementation, and result monitoring as a result of observed problems (or success) in the implementation of existing activities?	3b. Have there been changes in the donors' AC agenda, implementation, and result monitoring as a result of observed problems (or success) in the implementation of existing activities?	
4. How effective have donor interventions been?	4. How effective have donor interventions been?	4. How effective have donor interventions been?
… in fostering institutional monitoring and evaluation mechanisms to fight corruption? (parliament, civil society, etc)?	… in fostering institutional monitoring and evaluation mechanisms to fight corruption? (parliament, civil society, etc)?	… in fostering institutional monitoring and evaluation mechanisms to fight corruption? (parliament, civil society, etc)?
… in fostering a culture of openness and supporting progress in the area of transparency, ethics, and public reporting?	… in fostering a culture of openness and supporting progress in the area of transparency, ethics, and public reporting?	… in fostering a culture of openness and supporting progress in the area of transparency, ethics, and public reporting?

Donor	Implementor	Non-state actor
… in dealing with the forms of corruption affecting poor people and women in particular?	… in dealing with the forms of corruption affecting poor people and women in particular?	… in dealing with the forms of corruption affecting poor people and women in particular?
5. Within donor organizations, how extensive and effective are preventive measures, such as financial management and control of programmes? What is the burden on country systems?	5. Within donor organizations, how extensive and effective are preventive measures, such as financial management and control of programmes? What is the burden on country systems?	
6. How effective is dialogue as a tool for coordinated donor response in monitoring and fighting corruption? Have stated intentions with regard to anti-corruption been matched by follow through on implementation, and have intended results achieved?		6. How effective is dialogue as a tool for coordinated donor response in monitoring and fighting corruption? Have stated intentions with regard to anti-corruption been matched by follow through on implementation, and have intended results achieved?
8. What do the donors see as the main lessons learned after years of anti-corruption support?	9. What do the national authorities see as the main lessons learned after years of receiving donor support to reduce corruption?	10. What do non-state actors including groups representing the poor and women, consider as main lessons for future work to address corruption?

1 Programme Performance Assessment (PAQ)[1]

The purpose of this document review form is to analyse the programmes (or major projects) of the commissioning donors in such a way that will enable comparison between donors and across countries.

This approach responds specifically to questions 1, 2, 3 and 7 as set out in the Objectives in the TOR and is linked to the Evaluation Framework matrix:

Objectives
The objectives are to obtain descriptive and analytic information related to actual results of the support provided by the five commissioning donors, both overall and for each of them in each of the selected countries, regarding:
1. corruption diagnostic work (highlighting, where relevant, information disaggregated by gender)
2. underlying theory, AC strategy and expected results of their support to reduce
corruption
3. implementation of support to specific AC interventions and achieved results
4. other donor interventions or behaviour relevant for corruption and AC efforts, and achieved results in terms of corruption
5. extent of coherence of AC practice between specific AC activities and other programs,
for individual donors
6. extent of coherence of AC practice within the donor group
7. the extent that gender and other forms of social exclusion have been taken into
account in donor interventions

Programme purpose & design

1.1: Is the programme purpose clear and realistic for the resources available?	Yes	No

Statement of evidence and document reference to support the finding:
The programme has three components, each with a development objective that is clear if a little vague and describes improved performance (1 and 2) and behaviour change (3);
1 Access to Justice: "People have improved access to formal and informal institutions entrusted with the delivery of justice"
2 Transparency and Accountability: "Citizens live in an environment of improved democratic practices and better performing public institutions."
3 Promotion of Human Rights: "Duty bearers respond to the demand for respect, protection and fulfilment of Human Rights"

1 Example of the report for the Danida Good Governance & Human Rights Programme

1.2: Does the programme address a specific and existing problem developed from situational analysis?	Yes	No
1.3 Does the situational analysis take adequate account of gender and poverty dynamics related to corruption?	Yes	No
1.4 Were national strategies taken into account in the analysis?	Yes	No
1.5 Was analysis by and interaction with non-state actors taken into account?	Yes	No

Statement of evidence and document reference to support the findings:

1.3 The programme rationale contains an extensive consideration of the impact of lack of access to justice on the poor, on women and on disadvantaged groups. In relation to corruption it states "The consequences for individuals seeking justice are no less negative. The unofficial costs of entry into and consideration by the justice system inevitably out-prices the poor in general, as well as groups disadvantaged by social and legal discrimination, such as women, indigenous peoples and children."

1.4 The PRSP is extensively relied on in the programme rationale eg. "The PRSP has identified the promotion of ADR as a key policy priority" "The PRSP has highlighted the consolidation of jail reform, community policing and the development of a comprehensive police reform agenda as important policy priorities related to the improvement of criminal justice." "The PRSP has also called for a multi-sectoral approach for the elimination of gender disparity and to children's rights. "

1.5 project partners were consulted in the preparation of the concept paper and the design but no consultation with non state actors outside the programme or analysis by non state actors is referred to.

1.6: Which UNCAC headings (and sub-headings) does the programme seek to address?	*Tick*
Prevention	
a. Preventive AC policies and practices	√
b. Preventive AC body or bodies	√
c. Public sector	√
d. Code of conduct for public officials	
e. Public procurement and PFM	
f. Public reporting	√
g. Measures relating to the judiciary and prosecution services	√
h. Private sector	
i. Participation of society	√
Measures to prevent money-laundering	
Criminalisation and law enforcement	√

1.7: Does the programme clearly identify links with broader governance reforms and whole-of-government approach (i.e supply side of governance)?	Yes	No
Statement of evidence and document reference to support the finding: The Programme Document contains extensive analysis of current governance reforms, coordination and fit of the Human Rights and Good Governance Programme within the context of those reforms. (Programme Document pp17 20)		

1.8: Does the programme identify the risk of misuse of donor money across the value-chain? (If 'Yes' What preventive measures – internal and complementary programmes – are identified)	Yes'	No
Statement of evidence and document reference to support the finding: Although the programme document contains a section on accounting and internal control (pp 57-58), the misuse of donor funds is not identified as a risk and a full risk analysis across the value chain has not been conducted		

Monitoring and management

2.1: Does the programme have a limited number of specific long-term performance indicators that focus on outcomes and reflect the purpose of the programme?	Yes	No
Statement of evidence and document reference to support the finding: What the programme document calls Immediate Objectives are long term measures of performance that focus on outcomes and reflect PRSP measures eg. Under component 1 the immediate objectives are; (i)The formal justice system is efficient in terms of case management and ensures fair treatment for all peoples, (ii) The informal justice system (Alternative Dispute Resolution – ADR) is strengthened and expanded and ensures fair treatment for all peoples. (iii) Disadvantaged people, especially women, adivasi/ethnic min ority groups and children have adequate assistance to utilize the justice system and claim redress.		

2.2: Does the programme have a limited number of specific shorter (annual) performance indicators that can demonstrate progress toward achieving the programme's long-term goals?	Yes	No
Statement of evidence and document reference to support the finding: Yes, eg. "Number of cases efficiently disposed of by lower judiciary per year increased by 8 % per year." (Component 1 log frame, Programme Document). This is clearly linked to the long term goal "People have improved access to formal and informal institutions entrusted with the delivery of justice" through the sub objective "The formal justice system is efficient in terms of case management and contributes to fair treatment for all peoples."		

2.3 Do the indictors include citizens' perceptions of changing corruption?	Yes	No
2.4 Are the performance indicators in line with national indicators	Yes	No
2.5: Do the indicators take gender and poverty adequately into account	Yes	No

Statement of evidence and document reference to support the findings:
2.3 One of the long term indicators for Component 2 is "Sustained improvement of scores in Corruption Index of Transparency International."
2.4 The programme document contains a PRSP Indicator and Policy Matrix at Annex 2 to illustrate the alignment of indicators
2.5 There is stratification of some indicators on gender eg. "Number of female representatives trained in gender and human rights." And "Number of initiatives taken by female representatives" (log frame component 2) "Number of people (disadvantaged, women and men and media professionals subjected to persecution and harassment) receiving legal assistance increased from 30% to 60%." (log frame component 1). The intention to analyse poverty dimensions is clear from the indicators although no precise stratification is proposed eg. "Improved service delivery especially for the poor and vulnerable. (Increased attendance of doctors at UP/Upazila level healthcare centres, of teachers at primary school, increased visit by agro-based government employers.)" (Log frame component 2);

2.6: Does the donor regularly collect timely and credible performance information, including information from key programme partners, and use it to manage the programme and improve performance?	Yes	No

Statement of evidence and document reference to support the finding:
Comprehensive annual progress reports are submitted by the PSU. Action appears to have been taken on the basis of a previous programme review "A plan for follow up actions based on the recommendations of the programme review held in May 2008, was developed, and several initiatives have been carried out during this reporting period. Among these, the interchange and lessons learned seminar among 4 partners working with local governance, and another workshop among indigenous peoples partner organizations and legal aid providers, deserves to be mentioned. Besides, a concept note as well as a brain-storming seminar with NGO partners regarding improved institutional governance has been made. The recommended updating and improvements of the monitoring system and the initiation of Tracer Studies has initiated and one impact study has been carried out and the final report is under preparation." (p5 Annual Progress Report 2008-09)

Results & accountability

3.1: Is there a results-chain that is being monitored?	Yes	No

Statement of evidence and document reference to support the finding:
Eg Component 1 includes assistance to the formal justice system;

Output is The ability of the lower judiciary to handle cases effectively increased
Output indicators for this output are; Number of cases efficiently disposed of by lower judiciary per year increased by 8 % per year and The average duration of cases disposed reduced by x hours per year.
Related outcome indicator is Backlog of cases reduced from x to y
(Programme Document. Log frame p80)

3.2: Has the programme demonstrated progress in achieving its long-term performance goals?	Yes	No

Statement of evidence and document reference to support the finding:
It hasn't been possible to evaluate progress towards at least one of the long term goals; (i)The formal justice system is efficient in terms of case management and ensures fair treatment for all peoples,
"The number of trained judges has been in line with the pre-established yearly target, but it is not possible at this stage to evaluate the national level impact of this training in relation to the objective. (Annual Progress Report 2008-09)"

Have donor interventions been effective?		
3.3 … in fostering institutional monitoring and evaluation mechanisms to fight corruption? (parliament, civil society, etc)?	Yes	No
3.4 … in fostering a culture of openness and supporting progress in the area of transparency, ethics, and public reporting?	Yes	No
3.5 … in dealing with the forms of corruption affecting poor people and women in particular?	Yes	No

Statement of evidence and document reference to support the finding:
3.3 and 3.4 The following extract from the Annual Progress Report 2008-09 is one example;
"Under the framework of the Good Governance Program implemented by the GoB with technical and financial support from ADB, which include TA funded by Danida, the following achievements from this reporting period deserves to be mentioned as they clearly contribute to the fulfilment of the objectives of the component:
- TA-funded consultants are currently supporting the Cabinet Division and office of the registrar (Supreme Court) to enable better management of good governance projects throughout the public sector.
- Amendments to Code of Criminal Procedure to make judiciary independent has been made, and all judicial sector appointments and personnel matters have been unbundled from the Public Service Commission.
- Financial accountability mechanisms and audit requirements in place in all departments,
- Practical and realistic monitoring and reporting protocols at the Supreme Court Basic monitoring protocols in place
- A separate prosecution service has been established with adequate budget.
- Strategic plan for reforms of Chittagong Port Authority has been made
- Complaint-handling mechanisms established in the central line ministries.
- Transparent and merit-based examination and quota system"

3.5 Under Component 2, the programme is supporting the Local Government Support Programme. One of the activities is to audit local governments and provide block grants to those that receive a clear bill of health. This encourages transparency and reduced corruption in local government the main provider of services for poor people and women. "The LGRD has with support from LGSP audited 2257 UPs in 2008, and those receiving clean audits will get nearly $50 million expanded block grants. Within the next three years, it is expected that LGSP will cover all the 4498 UP" (Annual Progress Report 2008-09)

3.6: Do independent evaluations indicate that the programme is effective and achieving results?	Yes	No
Statement of evidence and document reference to support the finding: No independent evaluation made available		

3.7: What have been the results on the level or trends of corruption?
Statement of evidence and document reference to support the finding: Danida funds TA to the ADB Good Governance Programme under its Human Rights and Good Governance Programme. The impact of the ACC on corruption is therefore partly attributable to this programme. Eg "ACC filed 262 corruption cases against politicians and businessmen during 2007, among which 74 cases have been disposed during the period and 188 cases are pending. At least 46 ex-ministers, members of parliament, politicians and their family members have been sentenced to different terms of rigorous imprisonment and fine. ACC initiated investigation against 197 listed corrupt ministers and politicians among which only 80 were arrested during the drive. Some of the listed people managed to leave the country and some were not arrested. 50 % of the arrested politicians have been convicted by now.[2]" (p12 Annual Progress Report 2007-2008)

2

2 Source: Official web site of Anti- Corruption Commission www. Acc.org.bd/verdicts and information collected from Legal and Prosecution wings of ACC.

Summary of questions scores from Programme Assessment Questionnaires

	Yes	No	Don't Know[3]	Total	Yes% of Yes+No
Project/ programme purpose & design					
1.1: Is the project/programme purpose clear and realistic for the resources available?	13	2	0	15	87%
1.2: Does the programme address a specific and existing problem developed from situational analysis?	12	2	1	15	86%
1.3 Does the situational analysis take adequate account of gender and poverty dynamics related to corruption?	9	5	1	15	64%
1.4 Were national strategies taken into account in the analysis?	13	1	1	15	93%
1.5 Was analysis by and interaction with non-state actors taken into account?	10	5	0	15	67%
1.6: Which UNCAC headings (and sub-headings) does the programme seek to address?					
1.7: Does the programme clearly identify links with broader governance reforms and whole-of-government approach (i.e supply side of governance)?	11	3	1	15	79%
1.8: Does the programme identify the risk of misuse of donor money? (If 'Yes' What preventive measures are identified)	5	9	1	15	36%
Monitoring and management					
2.1: Does the programme have a limited number of specific performance indicators that focus on outcomes and reflect the purpose of the programme?	11	4	0	15	73%
2.2: Does the programme have a limited number of specific shorter (annual) performance indicators that can demonstrate progress toward achieving the programme's long-term goals?	11	4	0	15	73%
2.3 Do the indictors include citizens' perceptions of changing corruption?	9	6	0	15	60%
2.4 Are the performance indicators in line with national indicators	6	9	0	15	40%
2.5: Do the indicators take gender and poverty adequately into account	8	7	0	15	53%

3 Recorded when no information available or when it is too early in the life of the project for an assessment.

	Yes	No	Don't Know[3]	Total	Yes% of Yes+No
2.6: Does the donor regularly collect timely and credible performance information, including information from key programme partners, and use it to manage the programme and improve performance?	11	4	0	15	73%

Results & accountability					
3.1: Is there a results-chain that is being monitored?	4	10	1	15	29%
3.2: Has the programme demonstrated progress in achieving its outcomes?	9	5	1	15	64%
3.3 … in fostering institutional monitoring and evaluation mechanisms to fight corruption? (parliament, civil society, etc)?	7	7	1	15	50%
3.4 … in fostering a culture of openness and supporting progress in the area of transparency, ethics, and public reporting?	12	1	2	15	92%
3.5 … in dealing with the forms of corruption affecting poor people and women in particular?	8	5	2	15	62%
3.6: Do independent evaluations indicate that the programme is effective and achieving results?	10	4	1	15	71%
3.7: What have been the results on the level or trends of corruption?					

Table 1: Listing of Goal and Purpose indicators

UNCAC	Donor programmes	Goal indicators	Purpose indicators
Preventive measures			
5. Preventive AC policies and practices *…..implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability.*	ADB Good Governance programme	Measures of satisfaction of public access to services show yearly increase. Contribution to economic growth by sectors most vulnerable to corruption shows yearly increases. Public perception of good governance in relevant sectors of operations improves in all surveys. Improved Transparency International ranking on corruption (from current CPI score of 2.0 to 2.5 by 2011).	Demonstrated Government commitment to implementation of the NIS and UNCAC provisions through increased budgetary allocations. Cabinet Division and office of the registrar (Supreme Court) better able to manage good governance projects throughout the public sector NIS is adopted by departments resulting in better management of grievance processes and use of resources, as verified by auditor general's report. Anticorruption Commission Act of 2004 amended to give Anticorruption Commission clearer powers and greater independence. Yearly increase in corruption cases investigated and prosecuted by Anticorruption Commission. All judicial sector appointments and personnel matters unbundled from the PSC. Yearly reduction in time taken to resolve corruption cases. Code of conduct adhered to, and monitored, at the Supreme Court and in district courts. All departments have fully operational accountability mechanisms or units. A functional office of ombudsman handles maladministration and handles cases of petty corruption.
6. Preventive AC body or bodies (a) Implementing the policies referred to in article 5 of this Convention and, where appropriate, overseeing and coordinating the implementation of those policies; (b) Increasing and disseminating knowledge about the prevention of corruption.	ADB and Danida support for ACC		Anticorruption Commission Act of 2004 amended to give Anticorruption Commission clearer powers and greater independence. Yearly increase in corruption cases investigated and prosecuted by Anticorruption Commission.

UNCAC	Donor programmes	Goal indicators	Purpose indicators
7. Public sector *… to adopt, maintain and strengthen systems for the recruitment, hiring, retention, promotion and retirement of civil servants and, where appropriate, other non-elected public officials:* *(a) That are based on principles of efficiency, transparency and objective criteria such as merit, equity and aptitude; etc.*	DFID Managing at the Top (MaTT)	GoB policies & programmes are citizen focused and more effective in meeting needs of the poor and women Indicators of bureaucratic effectiveness	60% of senior management pool received MATT training by end of Year 7 Evidence of reform proposals being initiated by 20% of MATT 2 participants by end of Year 3 Perception in the civil service and amongst public that MATT participants are making a difference by end of Year 3 Secretaries report that at least 50% MATT participants perform more effectively than previously by end of Year 3 Citizen-focused PIP processes in place by end of Year 1
8. Code of conduct for public officials *… promote, inter alia, integrity, honesty and responsibility among its public officials,….. establishing measures and systems to facilitate the reporting by public officials of acts of corruption to appropriate authorities*			

UNCAC	Donor programmes	Goal indicators	Purpose indicators
9. Public procurement and PFM *… establish appropriate systems of procurement, based on transparency, competition and objective criteria in decision-making, that are effective, inter alia, in preventing corruption…..* *….take appropriate measures to promote transparency and accountability in the management of public finances.*	FMRP RIRA SISP	Progressive annual increase in allocation of resource towards economic growth and poverty alleviation Progressive improvement in the efficiency and effectiveness of social spending Improved equity in service delivery to venerable groups (e.g. defined by region and/or gender) Direct tax and VAT collections increased in real terms by end of project. 1. Resource allocation increasingly targeted to poverty alleviation activities in next 5 years 2. Efficiency of throughput of projects increases 25% over next 5 years	Financial Management capacity further strengthened in FD and in line Ministries by June 2009. Financial Management reporting capacity strengthened in Line Ministries and CGA by June 2009. Line Ministries develop improved approaches to resource financial management and utilisation focused on strategic priorities including poverty alleviation by June 2009. Finance Division progressively establishes clear administrative framework for fiscal management and reporting by June 2009. Aggregate resource envelopes underpinned by more effective analysis by June 2009 FD develops capacities to monitor analyse and forecast Fiscal Policy Objectives/ Issues and develop initial resources by June 2009. C&AG publishes improved timely and focused commentary on integrity of fiscal information, and propriety and effectiveness of public expenditure by June 2009. Training of appropriate GoB Officers in Financial/ Resource/ Performance Management institutionalised within FIMA by June 2009 1. Tax administration within LTUs reformed and units reorganised and working along functional lines by end-June 2007. 2. CIC (Central Intelligence Cell) is strengthened with well defined operating procedures and processes for both criminal and civil investigations by end-June 2007 3. By end-June 2007 direct tax and VAT revenues attributable to LTU activity have increased their share of total tax revenue from 34% and 62 % respectively in FY 05/06. 1. Computerised production of ADP in Sector Divisions as well as in the Programming Division improves quality of information 2. Planning decisions based on reasonably accurate detailed data, analysis and forecasts 3. Improvement on the interface established between ADP and Development Budget 4. Throughput of projects increases

UNCAC	Donor programmes	Goal indicators	Purpose indicators
10. Public reporting *to enhance transparency in its public administration, including with regard to its organization, functioning and decision-making processes, where appropriate.*	Strengthening Parliamentary Democracy	n/a	n/a
11. Measures relating to the judiciary and prosecution services *Bearing in mind the independence of the judiciary and its crucial role in combating corruption, each State Party shall, in accordance with the fundamental principles of its legal system and without prejudice to judicial independence, take measures to strengthen integrity and to prevent opportunities for corruption among members of the judiciary.*	ADB Good Governance Denmark Access to Justice	1.1. Percentage of people, particularly by the disadvantaged people, who have confidence in the formal and informal justice system, increases.	All judicial sector appointments and personnel matters unbundled from the PSC. Yearly reduction in time taken to resolve corruption cases. Code of conduct adhered to, and monitored, at the Supreme Court and in district courts. 1.1. Backlog of cases reduced from x to y. 1.2. Judiciary and law enforcement equipped with tools and techniques to practice thorough investigation and fair trial. 2.1. Number of cases solved through ADR increased from x to y. 2.2. Number of referral cases from the informal system to the formal judiciary reduces. 3.1. One-stop crisis centres are sustainable service delivery points with appropriate treatment, examinations and facilities, referral methods and legal services. 3.2 Number of applications for GoB legal aid funds increased x to y %. 3.3. Number of provisions of legal assistance from NGO/GO increased x to y %.
12. Private sector *to prevent corruption involving the private sector, enhance accounting and auditing standards in the private sector and, where appropriate, provide effective, proportionate and dissuasive civil, administrative or criminal penalties for failure to comply with such measures.*		n/a	n/a

UNCAC	Donor programmes	Goal indicators	Purpose indicators
13. Participation of society *to promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and the fight against corruption and to raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption.*	Transparency International SAMATA	Increased transparency in public, non-profit and private sector transactions Effectiveness (as evidenced by pro-poor orientation in policies and practices including budgetary allocations, monitoring of compliance regarding entitlements of the poor, greater accountability to the poor) of both individual and combined efforts of rights –based people's organisations and networks	Increased accountability through the application of alternative information sharing mechanism in public, non-profit and private sector transactions Legal instruments have been enforced for ensuring good governance Changes in the of fulfillment of citizens' entitlements including the poor and marginalized in catchment's areas[4] in selected service delivery sectors like health, education, local government institutions, as identified by CCCs. Acceptance of practices against corruption increased within selected organizations (Public/Private/Nonprofit) Changes in the capacity to enhance level of human security by providing issue-based advice and information and advice including referral service. • Contribution to MDG income poverty indicator- 175,000[6] households (HH) (approx. 910,000 people) living on at least $1/pers/day • Contribution to MDG gender & education indicator-girl/boy equal access to education indicator-no groups reporting full primary school attendance target, min 80%[7] attendance • Increase in asset accumulation (housing stock, savings, sanitation, food stock) of poor • Perceived increase in status, dignity and respect of poor compared with 2005. Perceived increase in social mobility compared with 2005. Women's rights issues taken up by men's groups as well as by women's groups and significant change in status and respect given to women (e.g. joint HH decision making, resource management) • Evidence of independent action (agency) taken by landless poor to claim and secure rights and entitlements

4 By catchment areas we mean coverage by key selected service delivery institutions in the CCC areas.
5 By human security we mean, increased access to basic entitlements such as health, education and justice.
6 Samata data shows with acquisition of khas (permanent or temporary lease of land or water bodies), incomes exceed this, therefore target based on expected HH khas acquisition.
7 Low figure reflects non availability of schools in some remote areas e.g. chars.

UNCAC	Donor programmes	Goal indicators	Purpose indicators
14. Measures to prevent money-laundering *1. (a) Institute a comprehensive domestic regulatory and supervisory regime for banks and non-bank financial institutions …* *(b) … ensure that administrative, regulatory, law enforcement and other authorities … have the ability to cooperate and exchange information at the national and international levels*			
Criminalisation			
Articles 15 to 42	DFID/UNDP Police		Yearly reduction in time taken to resolve corruption cases. % Change of people who feel safer and trust the police as a symbol of safety Access to justice and personal safety improved through better policing for poor and vulnerable people, especially women and children
International Cooperation			
Articles 43 to 50	STAR Hunters Network		n/a

Lessons reported from different stakeholders

Lessons from donors

1. **Political instability and the lack of political will have been identified as the main hindrance to progress.** Main areas of achievements took place during a military-backed caretaker government. There is now a risk that progress may not be sustained because of the new government in place.

2. **Government ownership of reforms is important for success.** In addition to political will, government ownership is required for essential reforms to be pushed through successfully.

3. Government ownership in Bangladesh has been jeopardised by lack of or change in political commitment; lack of linkages in government between vision at the national level and implementation at the ministry level; and quick and untimely transfers of focal points in the bureaucracy, which makes it difficult for the bureaucrats to use their relevant skills and expertise in the interest of the projects they were handling.

4. Although donors have increasingly resorted to political economy analysis to inform their programmes, this has yet to change the way they identify their partners or design their projects in the government sector.

5. **Changing behaviour requires external pressure.** Public institutions do not reform themselves. This was already identified as a lesson in the ADB Country Governance Analysis (2004).[8] Similarly, Foot (2007) concludes that generating internal demand for change is not enough, and that as well as working with the public sector, there is a *"need to work with other groups of society who want to see a change in the way public money is managed".*

6. **Long-term interventions in the governance sector have shown few benefits in the absence of political will.** Working within the institutional environment and promoting an incremental approach to reforms has been the approach promoted by DFID in PFM reforms in Bangladesh. The rationale was that changes will not take place if they go against vested interests in public administration. For changes to happen, they need to be bureaucrat-friendly and incremental. As said by DFID advisers, *'A lot of small steps need to be taken before working at policy level'.* Associated with this thinking is donor recognition that civil service and other administrative reforms are difficult, take time and demand a long-term engagement. Not surprisingly this same incremental approach is also favoured by senior civil servants. *'You can't push a mountain, but you can remove stones'.* Recent impact assessments have since shown that their impact was minimal, however long-term and extensive they were.

8 *'Experience attests that public institutions, left to their own devices, do not reform themselves. Reform initiatives are invariably driven by a combination of internal and external forces and incentives of various kinds. These precipitating forces may include: "champions of reform" within government agencies; conditionality requirements that have added a time-bound rigor to reform efforts in some areas; events in one sector that serve as catalysts for unforeseen spillover benefits in others; or demands raised by private sector or civil society stakeholders.'*

7. **Donor coordination and dialogue is essential to in uence government policy. Donors must combine their development assistance with political pressure**. A coordinated approach can put adequate pressure on the GoB to accelerate reforms. The challenge for donors is then to find the right balance between pushing for reform and compromising. *'A lot of wrestling takes place under the table'.* The threat of donors withdrawing their support was cited as an option of what donors can do. This approach is more likely to be effective in sectors, like education, where GoB needs donor money for service delivery.

8. Adding rule and regulations may equally help to reduce opportunities for corruption as it creates new ones, as more signatures and stamps are required. Streamlining processes hence remains essential.

Lessons from civil society

9. **More evidence of corruption can, perversely, be an indication of success:** systems working better detect more of it.

10. **Projects must be prepared to respond swiftly and repeatedly to opportunities as they arise.** This principle is successfully utilised by TIB in their work to reduce corruption in public service institutions, such as hospitals and schools. Community watchdogs monitor the institutions after a TIB intervention. If improvements are not sustained, TIB will intervene repeatedly until the reforms are sustained. Entry points for intervention need to be chosen carefully.

11. **Development partners need to focus on prevention of corruption by continuing their support to civil society:** to strengthen, meet and make visible the population's desire to end corruption. The desire for change needs to come from citizens. civil society is a significant driver of change in Bangladesh.

12. **Experience with TIB also shows the importance of pressure from civil society.** Pressure from civil society can curb government action or force the government's arm. For example pressure from civil society forced the government's arm in setting up the Human Rights Commission and entrenching the powers of the Comission more firmly than those of the ACC under the ACC Act.

13. **The lack of results in governance reforms can be blamed on both sides.** The lack of continuity, coupled with the lack of high quality technical advisory support, means that donor-funded projects in public sector reforms do not get enough buy-in. At the same time, GoB knows how to manipulate donors and play one against one another. They know donors' own dynamics, namely that they have to spend a certain amount of money to meet their annual spending targets.

14. **Check and balance institutions will be as effective as the GoB wants them to be.** As donors continued to support institutions, GoB has shown strong resistance to revising essential laws, including in tax, police and parliament. In addition, successive governments have tampered Acts regulating the mandate of key institutions and with it, continue to interfere and curtail their independence.

15. **Mainstreaming AC in sector programming is extremely important.** Encouraging participation of end-users is identified as best practice to address corruption within sectors. In so far as local organised groups are not yet politicised the common interest is more powerful than politics. Specific AC work by donors is mostly difficult to link to reduced corruption for the poor and women; but may be easier in service delivery sectors such as health and education.

Lessons from government

16. **Donors are not good at taking stock of where they are:** explained by pressure to spend (although some respondents claim this is really changing), frequent changes in staffing, and difficulty in showing impact in the governance area. Short duration of postings/high turnover of donor staff leave offices with little sense of historical perspective and process.

17. **More discussion is needed between donors and GoB in the design phase.** Donors tend to be prescriptive and ignore the culture of non-compliance within public administration. Ensuring buy-in from GoB and understanding vision is essential to ensure anti-corruption initiatives are worthwhile (for example, the comparative experience with the ACC vs Human Rights Commission).

18. **The caretaker government went too fast in throwing it support behind ACC.** A more cautious approach was needed, by first assessing the level of competence within the organisation; then strengthening the capacity that already exists, while slowly moving ahead with developing further capacity as the situation requires.

ANNEX 2:
Terms of reference

Joint External Anti-Corruption Evaluation

1. Background

Corruption undermines democratic values and institutions, weakens efforts to promote gender equality, and hampers economic and social development. In recent years, donor agencies have increasingly made the fight against corruption part of their larger governance agenda.

The Asian Development Bank (ADB), the Danish International Development Assistance (Danida), the Swedish Agency for Development Evaluation (SADEV), the Swedish International Development Co-operation Agency (SIDA), the UK Department for International Development (DFID), and the Norwegian Agency for Development Co-operation (Norad) will undertake a joint evaluation of anti-corruption (AC) efforts. Norad, on behalf of the six agencies, seeks consultants to undertake the evaluation.

The evaluation will take place in 2009 and 2010, with case study fieldwork expected to take place in Vietnam, Bangladesh, Tanzania, Zambia, and Nicaragua.

In preparation for the evaluation, a pre-study was undertaken in 2008. It included a literature review[1] an outline of a possible analytical framework for the evaluation (the evaluation team is not restricted to use this approach), and a partial mapping of donor support[2].

The donor mapping survey showed that each of the five[3] commissioning donor agencies supports efforts to improve overarching anti-corruption frameworks, including laws and specialised anti-corruption bodies. Agencies also provide considerable resources for public finance accountability, in particular general public financial management systems and ministries of finance, often in conjunction with budget or large-scale financial support. The survey showed less support for financial accountability at lower levels of government, while state accountability bodies like supreme audit institutions and in some cases also parliamentary oversight bodies receive some capacity development assistance.

1 A published version, Anti-Corruption Approaches. A Literature Review, can be downloaded from www.norad.no/evaluering
2 The pre-study can be obtained from Norad.
3 SADEV is not a donor

The pre-study reveals that while much of the corruption takes place in connection with service delivery, there seem to be only limited donor support at this level. There is little documented evidence of work to specifically address gender dimensions. The donors had different priorities when it comes to supporting non-state actors, though in the aggregate there was considerable aid to civil society actors and the media, but little to the private sector or political parties.

2. Rationale and Audience

Rationale

The commissioning donors have paid considerable attention to anti-corruption in their development cooperation in recent years. Levels of corruption remain high in many countries, however, and there is a wish to find out how support in this area can become more effective.

Audience

The primary audience for the evaluation is the agencies commissioning the work. Secondary audiences include interested parties in the case countries (national authorities, civil society, others), other countries and donor organisations.

3. Purpose, Objectives and Scope

Purpose of the evaluation

The purpose is to obtain knowledge regarding the relevance and effectiveness of support to reduce corruption, both through specific anti-corruption efforts and in other programs – in order to identify lessons learned regarding what kind of donor support may work (for poor people and women in particular), what is less likely to work and what may harm national efforts against corruption.

Objectives

The objectives are to obtain descriptive and analytic information related to actual results of the support provided by the five commissioning donors, both overall and for each of them in each of the selected countries, regarding:

1. corruption diagnostic work (highlighting, where relevant, information disaggregated by gender)

2. underlying theory, AC strategy and expected results of their support to reduce corruption

3. mplementation of support to specific AC interventions and achieved results

4. other donor interventions or behaviour relevant for corruption and AC efforts, and achieved results in terms of corruption

5. extent of coherence of AC practice between specific AC activities and other programs, for individual donors

6. extent of coherence of AC practice within the donor group

7. the extent that gender and other forms of social exclusion have been taken into account in donor interventions

Scope

The evaluation shall cover all major specific AC activities of the five donors in the selected countries, as well as a selection of other programs of the five donors of relevance to the reduction of corruption.

The other, not-AC specific programs should preferably be found within one single area or sector in a given country. If necessary to study substantial programs of all of the commissioning donors present in the country, programs may be drawn from different areas. Preferably, the overall selection in the five case countries should comprise different areas (e.g. infrastructure, extractive industries, social sectors and budget support).

The evaluation shall include the issues of gender, poverty and social exclusion when possible and relevant, both as to whether these issues are dealt with by the donor interventions and the results achieved.

The initial mapping of donor work should build on and extend the information made available by the pre-study mapping, producing a comprehensive overview of the five donors' AC engagement and other major programs in the selected countries. The main emphasis shall be on the period from 2002 to the present, but the previous period shall be included whenever necessary to answer the evaluation questions or understand later engagement.

The evaluators are not supposed to prepare an extensive analysis in terms of the political economy and corruption context of the case countries. The evaluation should, however, be made against the background of a thorough understanding of this context, and this should be evident in the reports.

4. Evaluation Criteria and Questions. Lessons Learned

The evaluation shall concentrate on the evaluation criteria of relevance[4] and effectiveness[5].

Due to the complexity and learning purpose of the exercise, it has been deemed less relevant to focus on efficiency, concentrating in stead on effectiveness, related to results at output and outcome level. An assessment of impact would require a substantial increase of time and resources and is also not included.

4 Definition of relevance: "The extent to which the objectives of a development intervention are consistent with beneficiaries' requirements, country needs, global priorities and partners' and donors' policies" (Glossary of Key Terms in Evaluation and Results Based Management, OECD/DAC).

5 Definition of effectiveness: "…an aggregate measure of (or judgement about) the merit or worth of an activity, i.e. the extent to which an intervention has attained, or is expected to attain, its major relevant objectives " (ibid.).

Although efficiency, impact and sustainability are not specifically addressed, the evaluators are expected to include limited assessments of these and other aspects that may emerge from the analyses of relevance and effectiveness or otherwise be deemed important.

Relevance

The questions should be answered descriptively and analytically for each donor in each case country. The extent of important commonalities and differences between the donors should be addressed.

General question:

Are the approaches employed by the five donors to address corruption (including its negative effects on poor people and women in particular) appropriate to country circumstances, and how could they be made more relevant?

Specific questions:

1. When did any increase in emphasis on anti-corruption efforts take place, and what were the reasons given for this change?

2. Was a state of corruption and political context mapping and analysis done prior to AC interventions, and, if so, what was the quality of this work? Were entry points and major obstacles clearly identified? Did the analysis consider possible corruptive effects of donor interventions? Were gender and poverty taken into account?

3. Did there exist venues for communication and discussion with government and non-state actors before defining the AC support programs?

4. What mechanisms have been in place for coordinating AC interventions among donors, with national authorities, and with non-state actors – at national and local levels?

5. Was the UN Convention Against Corruption, as a binding legal and political international commitment to further good governance, used and promoted?

6. What are the donor supported activities and interventions explicitly addressing corruption? Are these and other programs in agreement with prior analytic work and the priorities of national AC reforms?

7. To what extent have the donors evaluated the development of their AC approach? Has there been sufficient understanding of the nature and impact of corruption on different groups in society?

8. Have there been changes in the donors' AC agenda, implementation and results monitoring as a result of observed problems in the implementation of existing activities? Are previous analyses and approaches relevant against the current understanding of the country's corruption situation?

Effectiveness

The questions should be answered descriptively and analytically, for each donor in each case country. The extent of important commonalities and differences between the donors should be addressed.

General question:

How effective have donor interventions been in addressing different types of corruption, including forms of corruption affecting poor people and women in particular?

Specific questions:

1. To what extent and how do donors promote open and transparent dialogue between governments, themselves, parliament and non-state actors to assess progress concerning anti-corruption measures?

2. To what extent and how do donors contribute to increasing the knowledge and understanding of corrupt practices, their forms, manifestations and dynamics, (including in service delivery), and are the findings widely disseminated to ensure public access to them?

3. To what extent and how do donors invest in fostering effective internal and non-state monitoring and evaluations of anti-corruption policies, e.g. from parliaments, universities and women's and civil society organisations? Does monitoring enable gendered forms of corruption to be captured and understood?

4. Do donor efforts contribute to strengthen the links between anti-corruption and governance reforms and the integration of specific anti-corruption components into core reforms?

5. Within donor organisations: what measures are taken (including risk identification and management) and what practices of financial management and control of programs are implemented to prevent corruption? To what extent have donors assessed the administrative burden for the recipient in this regard?

6. Have stated intentions with regards to anti-corruption been matched by follow-through on implementation, and have intended results been achieved?

7. What is the nature of diagnostic tools and donor reactions, individually and collectively, when partner governments do not live up to mutual agreements? What are the commonalities and differences between the donors in this regard?.

8. Do donors portray a contradiction between non-tolerance towards corruption and support to achieve development goals, or do they pursue a pragmatic middle ground?

9. Are the donor actions in line with the current international agreements with regard to harmonisation of aid and the OECD/DAC principles for donor action in anti-corruption?

Lessons learned

The evaluators should identify major lessons learned about increasing the relevance and effectiveness of donor support to anti-corruption efforts, including for improving the lives of poor people and women. Where applicable they should relate these to individual or collective donor programs and partner countries. The following specific questions should be addressed:

1. What do the donors see as the main lessons learned after years of anti-corruption support?

2. What do the national authorities see as the main lessons learned after years of receiving donor support to reduce corruption?

3. What do non-state actors including groups representing the poor and women, consider as main lessons for future work to address corruption?

4. What does the evaluation team see as the reasons behind successful interventions?

5. What does the evaluation team see as the reasons for major disappointments?

6. Did disappointments happen after deliberately taking risks, because of poor planning and understanding, or because of changes in circumstances?

7. What can be learned from the positive and negative cases?

5. Methodology

It will be part of the assignment to develop a methodological and conceptual framework to ensure objective, transparent, gender sensitive, evidence-based and impartial assessments as well as ensuring learning during the course of the evaluation. The following methods should, as a minimum, be considered:

1. Document analyses

2. Interviews of key stakeholders

3. Field visits to the five selected countries to complement and correct information, reaching out to public officials, non-state actors, donor representatives and others. The field-based evaluations may be done as one joint exercise between an international and a national team, or be divided into phases.

Some guiding principles:

1. Triangulate and validate information

2. Assess data quality (strengths and weaknesses of information sources).

3. Highlight data gaps.

4. Base assessments on factual findings and reliable and credible data and observations.

6. Organisation and requirements

Evaluation Team

The evaluation team is expected to consist of an international team plus national teams for each of the study countries.

The international team will consist of a minimum of four persons, and will report to Norad through the team leader. The team leader will be responsible for the contact with key national stakeholders and ensure that they are allowed to contribute and comment as appropriate. The team leader should meet these requirements:

- Substantial experience in the area of development cooperation.
- Proven successful team leading; preferably with multi-country teams in complex tasks on sensitive issues
- Advanced knowledge and experience in evaluation principles and standards in the context of international development.
- Experience in reviewing principles and standards related to work against corruption

The international team as a whole should have competence, expertise and experience in relation to the following areas:

- donor policies, modalities and aid delivery systems;
- public financial management
- survey and data analysis
- political economy, governance, work against corruption, anthropology, gender
- relevant regions, countries and cultural contexts.
- Languages: English. In addition, since part of the documentation will be in Danish, Norwegian or Swedish, at least one team member should be able to read Scandinavian languages.

Gender balance will be regarded as an asset of the team.

National Teams

Each team should consist of not less than two persons, one of whom should be a senior person with experience and solid knowledge in the study subject. The joint team in each country (national and international) should be gender balanced.

The national teams are expected to contribute with compilation of an inventory of relevant studies, surveys and disaggregated data (if possible), participate in the field work and contribute, as agreed with the international team, to the analysis and drafting of reports.

Data collection

Each evaluation team will be responsible for data-collection. Access to archives will be facilitated by the commissioning donors.

The evaluation team may consider using research assistants in data collection. Where relevant, gender specific data shall be collected and accounted for in the findings and analysis of the report.

Organisation

The evaluation will be managed by a management group of the commissioning agencies, lead by Norad's Evaluation Department (Norad). An independent team of researchers or consultants will be assigned the evaluation according to the standard procurement procedures of Norad (including open international call for tenders). The team leader shall report to Norad on the team's progress, including any problems that may jeopardize the assignment. The team is entitled to consult widely with stakeholders pertinent to the assignment. All decisions concerning these ToR, the inception report, draft report and other reports are subject to approval by Norad on behalf of the management group.

The evaluation team shall take note of the comments from stakeholders. Where there are significantly diverging views between the evaluation team and stakeholders, this should be reflected in the report.

Budget

The tender shall present a total budget with stipulated expenses for fees, travel, field work and other expenses. The evaluation is budgeted with a maximum of 150 consultant person weeks for the international team plus a maximum of 75 person weeks to be distributed between the national teams, excluding possible national research assistants. The team is supposed to travel to the five case countries as well as to the five donor headquarters. Additionally, two team members are expected to participate in the following four meetings in Oslo: A contract-signing meeting, a meeting to present the inception report, and two meetings for presenting draft and final reports. The consultants may be requested to make additional presentations, but the cost of these will be covered outside the tender budget.

The budget and work plan should allow sufficient time for presentations of preliminary findings and conclusions, including preliminary findings to relevant stakeholders in the countries visited and for receiving comments to draft reports.

7. Reporting and Outputs

The Consultant shall undertake the following:

1. Prepare an inception report providing an interpretation of the assignment. This includes a preliminary description of the country context, a description of the methodological design to be applied and suggested selection of donor supported programs in the five case countries. The inception report should be of no more than 10 000 words excluding necessary annexes.

2. At the end of each country visit, present preliminary findings, conclusions and recommendations in a meeting to relevant stakeholders, allowing for comments and discussion.

3. Prepare draft country reports not exceeding 20 000 words plus necessary annexes, comprising an overview of the donors' AC support, key findings, con-

clusions, possible recommendations, lessons learned and an executive summary (of not more than 2000 words).

4. After receiving comments, prepare final country reports.

5. Prepare a work progress report not exceeding 2000 words, informing about the progress of the evaluation and possible obstacles encountered by the team.

6. Prepare a draft synthesis report not exceeding 30 000 words plus necessary annexes, based i. a. on the country reports and presenting the preliminary findings, conclusions, possible recommendations and lessons learned across countries and donors. The report should contain an executive summary of not more than 2500 words).

7. After receiving comments, prepare a final synthesis report.

8. Upon further confirmation, prepare a series of up to 6 short (4-6 pages) briefing papers summarising key findings and policy messages in an accessible format, to ensure dissemination of the most important findings of the evaluation to particular groups. The specific structure, content and audience of each paper will be agreed with the management group on completion of the synthesis report. Costs related to the preparation of these reports should appear separately in the tender budget and payment is subject to later confirmation.

All reports shall be written in English. The Consultant is responsible for editing and quality control of language. The country reports and final synthesis report should be presented in a way that directly enables publication. Report requirements are further described in Annex 3 Guidelines for Reports.

The evaluation team is expected to adhere to the DAC Evaluation Quality Standards as well as Norad's Evaluation Guidelines[6]. Any modification to these terms of reference is subject to approval by Norad. All reports shall be submitted to Norad's Evaluation Department for approval.

6 See. http://www.norad.no/items/4620/38/6553540983/Evalueringspolitikk_fram_til_2010.pdf

ANNEX 3:
Itinerary and list of people consulted

Itinerary

Date	Day	Itinerary
November		
1	Sun	
2	Mon	Pre-visit preparation
3	Tue	Travel
4	Wed	Team arrives Afternoon team meeting
5	Thu	10.30 ADB briefing 12.30 ADB Education 14.30 Joint meeting all donors
6	Fri	
7	Sat	Team review meeting
8	Sun	08.30 DFID 14.00 Denmark 13.00 Ministry of Finance, Joint Secretary Budget 14.30 Ministry of Local Government
9	Mon	0930 Ch Eng LGED 11.30 DG FAPAD 13.30 Norwegian Embassy 15.00 PSC
10	Tue	10.30 Registrar of the Supreme Court 12.00 Judicial Services Commission 14.30 Swedish Embassy 15.00 DG Primary Education
11	Wed	10.00 Transparency International (Bangladesh) 15.00 Additional Secretary, Cabinet Division
12	Thu	08.45 ADB (Good Governance Program) 11.30 DFID 16.00 CPD
13	Fri	
14	Sat	Team review meeting
15	Sun	11.30 Comptroller & Auditor General 15.00 Min of Law 19.00 Bar Assoc

Date	Day	Itinerary
16	Mon	08.15 USAID 09.00 Program Manager GGP 11.30 ACC 13.00 BLAST 15.00 DFID 18.00 TIB
17	Tue	11.00 PEDP2 PLU 11.00 Danida 14.00 Workshop
18	Wed	Field visit Gazipur (TIB, Committee of Concerned Citizens) and Sirajganj (Local Government, Primary Education, Judiciary) Belkuchi Upazila Education Officer, Belkuchi Upazila HQ, Sirajganj District Additional Deputy Commissioner, Sirajganj District HQ
19	Thu	Field visit Sirajganj SMC (School Managing Committee) of the Chandidashgaati Primary and High School, Chandidashgaati village, Belkuchi union, Belkuchi upazila Belkuchi Union Parishad Office Bearers, Belkuchi Union Parishad Office Upazila Nirbahi Officer, Belkuchi upazila HQ Belkuchi Women's Development Forum, Belkuchi upazila HQ Deputy Commissioner, Sirajganj district
		Dhaka 12.00 Dutch Embassy, Doris Voorbraak, Deputy Ambassador, Theo Oltheten, Education and Health, Pieter Terpstra, Water Management 14.00 Institute for Governance Studies, Manzoor Hasan, Director 18.00 GTZ, Monika Krengel, Monitoring and Evaluation Unit, Health and Family Welfare 19.00 Gopakumar Thampi, COO, ANSA-South Asia and Global, BRAC University
20	Fri	09.00 pro VC BRAC University, Dr Salehuddin Ahmed
21	Sat	12.00 DG ACC, Col Hanif Iqbal 16.00 Ex Chairman ACC, Gen Hasan Mashud Chowdhury Team review meeting
22	Sun	08.30 Swedish Embassy (Education) 10.00 Police Headquarters 12.00 World Bank 14.30 Feed-back meeting ADB
23	Mon	08.30 UNDP 11.00 DFID Senior Governance Adviser 12.00 DFID Senior Education Adviser 12.30 DFID Bo Sundstrom
24	Tue	10.00 Dutch Embassy, Henny de Vries, Governance and Gender Team departs
25	Wed	Team departs

List of people contacted

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ANNEX 4:
List of documents consulted

This list only includes publicly available documents. The team also consulted all internal documents, including project memorandums, annual reports and final reviews.

ADB 2003 *Report And Recommendation of The President to the Board Of Directors* on a Proposed Loan to the People's Republic Of Bangladesh for the Second Primary Education Development Program

ADB 2007 *Report and Recommendation of the President to the Board of Directors*. Proposed Loan and Technical Assistance Grant. People's Republic of Bangladesh: Good Governance Program. Project number: 37017

ADB 2008 Loan 2362-BAN: *Good Governance Program Progress Report*: Release of Second Tranche

ADB 2008 *Sector Assistance Program Evaluation* Education Sector in Bangladesh: What Worked Well and Why under the Sector-Wide Approach? Reference Number: SAP: BAN 2008-82

ADB 2009 *Country Assistance Program Evaluation* CAP:BAN 2009-37

Business Anti Corruption Portal, Bangladesh Country Profile: http://www.business-anti-corruption.com/country-profiles/south-asia/bangladesh/snapshot/

Centre for Governance Studies, The State of Governance in Bangladesh 2006, BRAC University, Dhaka, 2006.

Centre for Governance Studies, The State of Governance in Bangladesh 2007, BRAC University, Dhaka, 2007.

Centre for Governance Studies, The State of Governance in Bangladesh 2008, BRAC University, Dhaka, 2008.

Commonwealth Education Fund (2008) PEDP-II *(in)Coherence between Micro Realities and Macro Plan*

Corruption in Distribution and Marketing of Natural Gas in Chittagong Region: A Case Study on Bakhrabad Gas System Limited, August 2008.

Danida Corruption Action Plan

DFID (2009) How to Note "Managing fiduciary risk when providing Financial Aid", DFID: London

DFID Bangladesh 2009 *Fiduciary Risk Assessment 2008*, Dhaka,

DFID Bangladesh 2008 *Bangladesh Governance Analysis*, Dhaka

DFID Bangladesh 2008 Bangladesh Governance Analysis, Dhaka, November 2008

DFID Bangladesh 2009, Fiduciary Risk Assessment 2008, Dhaka, 2008.

Doig and Williams in Public Administration and Development Volume 27 Issue 3, Pages 251 - 259

Duncan, Alex., Iffath Sharif, Pierre Landell-Mills, David Hulme, Jayanta Roy 2002 *Bangladesh. Supporting the drivers of pro-poor change*

Ferdous Jahan, From rule of law to legal empowerment of the poor in Bangladesh: Towards an agenda for change.

FMRP, Governance, Management and Performance in Health and Education Facilities in Bangladesh: Findings from the Social Sector Performance Qualitative Study, Dhaka, January 2007.

Foot S and AK Mubin (2007), Political Economy Assessment for Review of Financial Management Reform Programme, DFID Bangladesh.

Global Integrity Index, Global Integrity Scorecard Bangladesh, 2008.

Global Integrity Initiative, Global Integrity Scorecard Bangladesh, 2008,

Government of Bangladesh (2005) *Unlocking the Potential, National Strategy for Accelerated Poverty Reduction*, Planning Commission

Government of Bangladesh and DFID, Assessment of the Impact of Financial Management Reforms in Bangladesh1992 to 2006, Dhaka, 2007.

Human Rights Watch, Ignoring Execution and Torture, May 2009.

IEG, World Bank, *Governance Assessment Bangladesh Country Assistance Evaluation*, Prepared by Verulam Associates Ltd. for the Independent Evaluation Group, World Bank January 2009

International Crisis Group, Bangladesh: Elections and Beyond, Asia Briefing N°84, 11 December 2008.

ITAD in Association with LDP (2009) Joint External Anti-Corruption Evaluation, *Final Inception Report*

Jones, Steve. Yasmin, Tahera. Gauchan, Devendra. Chowdhury, Alamgir. 2007. *Impact Assessment of Social Mobilisation for Economic Empowerment*. Dhaka.

Kaufmann D., A. Kraay, and M. Mastruzzi 2009: *Governance Matters VIII: Governance Indicators for 1996-2008*

Khan, M.M. and H.M. Zafarullah. «The 1979 Parliamentary Elections in Bangladesh», Asian Survey, Vol.19, No.10: 1023-1036, 1979.

Khan, M.M., «The Electoral Process in Bangladesh», Regional Studies, Vol.7, No.3: 95-111, 1989.

Knox, Colin., and TaheraYasmin 2007, *TIB Impact Assessment Report*

Kochanek, S.A., Patron-Client Politics and Business in Bangladesh. Dhaka: UPL, 1983. Franda, M.. Bangladesh: The First Decade. New Delhi: South Asian, 1982.

Law and Development Partnership 2006, *DFID Safety, Security and Access to Justice Programmes: Practical Lessons from Experience*

Lindahl, Bengt and Fazlur Rahman (2007) *Bangladesh Second Primary Education Development Program, PEDP-II Textbook Review Consultancy*

Moor (2003), Politics and the Drivers of Pro-Poor Change in Bangladesh, DFID: Bangladesh

National Democratic Institute for International Affairs, Money in Politics: A study of Party Financing Practices in 22 countries, 2005.

Oxford Policy Management (2008) *OPM Briefing Notes 2008-04* Tracking public resources and measuring informal payments in Bangladesh

PBS, Bangladesh: Following the Siemens Bribery Trail, by David Montero, 1 April 2009: http://www.pbs.org/frontlineworld/stories/bribe/2009/04/bangladesh-following-the-siemens-bribery-trail.html

PEDPII 2009 Second Primary Education Development Program. *FIFTH Joint Annual Review Mission* (JARM) 14 May-1 JUNE 2009 (Main Mission: 17-21 May 2009) Revised Final Aide Memoire – 3 August 2009

PEDPII PLU2009 *Trend Analysis and Status of FAPAD Audit Observations*

Privatisation Commission, Privatization in Bangladesh: Opportunities and Potentials, July 2007.

Representation of the People Order 1972 and Conduct of Election Rules 1972.

Samer Al-Samarrai (2008) *Governance and education inequality in Bangladesh*. Paper commissioned for the EFA Global Monitoring Report 2009, Overcoming Inequality: why governance matters

Second Primary Education Development Program 2008 *Governance Report 2008*. Directorate of Primary Education, Ministry of Primary and Mass Education, Government of the People's Republic of Bangladesh

Sida (2009) *Reality Check Bangladesh 2008*. Listening to Poor Peoples' realities about Primary Healthcare and Primary Education. Stockholm

Stapleton, A, Moran, G and Hossain, S. Joint Assessment of Prospects for Harmonisation within the Justice Sector in Bangladesh 2007. commissioned by the Justice and Human Rights Working Group of the Local Consultative Group of the Development Partners in Bangladesh. Funded by the CIDA, DFID-WB Trust Fund, DANIDA and the GTZ.

TIB (2008) Administration and Management of Primary Education: Problems and the Way Out

TIB 2008, *Administration and Management of Primary Education: Problems and the Way Out*, July

TIB, Bangladesh Election Commission: A Diagnostic Study, November 2006.

TIB, Bangladesh Public Service Commission: A Diagnostic Study, March 2007.

TIB, Biman Bangladesh Airlines: A Diagnostic Study.

TIB, Bureau of Anti Corruption, Fact Finding Mission, 2001. IGS, Institutions of Accountability: Anti-Corruption Commission, 2007.

TIB, Corruption Database Report 2005, July 2006.

TIB, Household Survey 2007.

TIB, Parliament Watch 2009: Report on Observation of the First Session of the Ninth Parliament, 2009.

TIB, Performance of the Power Sector of Bangladesh: Governance Failures and Remedial Measures.

TIB, Problems of Governance in the NGO Sector: The Way Out.

TIB, Tracking the Election Process: An Analysis of the Violations of Electoral Code of Conduct by the Candidates of the Postponed Ninth Parliamentary Election, February 2007.

Wood, John., Hasnat Abdul Hye, Amit Shrivastava (2003) *Developing a risk reduction strategy on financial management and governance in PEDP2*

World Bank (2008) Education For All In Bangladesh. Where Does Bangladesh Stand in Achieving the EFA Goals by 2015? *Bangladesh Development Series Paper No. 24* Human Development Unit South Asia Region

World Bank, Bangladesh Community-Based Local Governance Support Project, Project Information Document, Washington D.C., 2006.

World Bank, Country Assistance Strategy 2006-2009.

ANNEX 5:
Donor mapping against United Nations Convention against Corruption categories

UNCAC Article & Headings	Donor Programmes
Preventive measures	
5. Preventive AC policies and practices *…..implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability.*	**ADB** Good Governance Programme (2007-12) US$ 150m
	Denmark Voter Cards with Photographs, (2007-10) US$ 918,679
	Norway The Asia Foundation (TAF) election Working Group (2006-07) US$ 83,000 **Norway** Making Waves, Transparency International Bangladesh (2003-06) US$ 1.4m **Norway** Preparation of Electoral Roll with Photographs (2007-2010) US$ 1,024,170
	Sweden Photo Voter ID (2007-10) US$ 1,035,886 **Sweden** Upazilla & Zia Election Observation (2003/4) US$ 210,000
	UK Fair Election Day Monitoring (2001/2) US$ 83,000 **UK** TAF Pre-Election (2001-2) US$ 158,000 **UK** Preparation of Electoral Roll with Photographs (2007-10) US$ 25,572,961.91 **UK** Access to information for greater participation and government accountability (2007-10) US$ 575,490
6. Preventive AC body or bodies *(a) Implementing the policies referred to in article 5 of this Convention and, where appropriate, overseeing and coordinating the implementation of those policies;* *(b) Increasing and disseminating knowledge about the prevention of corruption.*	**ADB** Good Governance Programme (2007-12) US$ 150m
	Denmark Human rights and Good Governance Programme Phase 2, Component 2 Transparency & Accountability (2006-12) US$ 6,0 m **Denmark** Human rights and Good Governance Programme Phase 2- Component 3: Human Rights (2006-11) US$ 17m **Denmark** Voter Cards with Photographs, (2007-10) US$ 918,679
	Norway The Asia Foundation election Working Group (2006-07) US$ 83,000 **Norway** Preparation of Electoral Roll with Photographs (2007-2010) US$ 1,024,170
	Sweden Photo Voter ID (2007-10) US$ 1,035,886 **Sweden** Upazilla & Zila Election Observation (2003/4) US$ 210,000
	UK Fair Election Day Monitoring (2001/2) US$ 83,000 **UK** TAF Pre-Election (2001-2) US$ 158,000 **UK** Strengthening Parliamentary Committees (2001-05) US$ 3.4m **UK** Workings of Government (2000) US$ 19,800 **UK** Preparation of Electoral Roll with Photographs (2007-10) US$ 25,572,961.91

UNCAC Article & Headings	Donor Programmes
7. Public sector *… to adopt, maintain and strengthen systems for the recruitment, hiring, retention, promotion and retirement of civil servants and, where appropriate, other non-elected public officials:* *(a) That are based on principles of efficiency, transparency and objective criteria such as merit, equity and aptitude; etc.*	**ADB** Good Governance Programme (2007-12) US$ 150m
	Denmark Human rights and Good Governance Programme Phase 2, Component 2 Transparency & Accountability (2006-12) US$ 6,0 m
	Sweden Bangladesh National Women Lawyers Association (BNWLA) (2003/5) US$ 0.56 m
	UK Strengthening Institutional Systems for Planning (SISP) (2002-3) US$ 2.1 m **UK** (joint with EU and UNDP) Police Reform Programme (2004-07) Phase I **UK** (joint with EU and UNDP) Police Reform Phase II ongoing US$ 9.1m **UK** Public Service Building Programme (2005-6) US$ 25.2 m **UK** Better Services through Stronger Institutions (2005) US$ 0.165 **UK** Public Service Capacity Building Programme (2004-13) US$ 32,487 **UK** Managing at The Top 2
8. Code of conduct for public officials *… promote, inter alia, integrity, honesty and responsibility among its public officials,….. establishing measures and systems to facilitate the reporting by public officials of acts of corruption to appropriate authorities*	**ADB** Good Governance Programme (2007-12) US$ 150m
	Denmark Human rights and Good Governance Programme Phase 2 Component 1: Access to Justice (2006-11) US$ 8.9m **Denmark** Human rights and Good Governance Programme Phase 2, Component 2 Transparency & Accountability (2006-12) US$ 6,0 m **Denmark** Human rights and Good Governance Programme Phase 2- Component 3: Human Rights (2006-11) US$ 17m
	UK Public Service Building Programme (2005-6) US$ 25.2 m **UK** Public Service Capacity Building Programme (2004-13) US$ 32,487 **UK** Access to information for greater participation and government accountability (2007-10) US$ 575,490 **UK** Better Services through Stronger Institutions (2005) US$ 0.165
9. Public procurement and PFM *… establish appropriate systems of procurement, based on transparency, competition and objective criteria in decision-making, that are effective, inter alia, in preventing corruption…..* *….take appropriate measures to promote transparency and accountability in the management of public finances.*	
	Denmark Human rights and Good Governance Programme Phase 2, Component 2 Transparency & Accountability (2006-12) US$ 6,0 m **Denmark** Financial Management Reforms Project (FMRP) (2002-08) US$ 13.1m
	UK Reforms in Revenue Administration (2002-07) US$ 3.6m **UK** Financial Management Reform Programme (2002-07) 39,743,000 US$ **UK** Public Financial Management Reform (2007-2012) US$ 300,180 **UK** Strengthening Institutional Systems for Planning (SISP) (2002-3) US$ 2.1 m **UK** Strengthening Public Expenditure Management (2009-14) US$ 46m- *Forthcoming* **UK** Tax administration compliance and taxpayer services (TACTS) 2010-15 – Forthcoming

UNCAC Article & Headings	Donor Programmes
10. Public reporting *to enhance transparency in its public administration, including with regard to its organization, functioning and decision-making processes, where appropriate.*	**UK** Strengthening Parliamentary Committees (2001-05) US$ 3.
	Denmark Human rights and Good Governance Programme Phase 2, Component 2 Transparency & Accountability (2006-12) US$ 6,0 m
11. Measures relating to the judiciary and prosecution services *Bearing in mind the independence of the judiciary and its crucial role in combating corruption, each State Party shall, in accordance with the fundamental principles of its legal system and without prejudice to judicial independence, take measures to strengthen integrity and to prevent opportunities for corruption among members of the judiciary.*	**ADB** Good Governance Programme (2007-12) US$ 150m
	Denmark Human rights and Good Governance Programme Phase 2 Component 1: Access to Justice (2006-11) US$ 8.9m **Denmark** Human rights and Good Governance Programme Phase 2- Component 3: Human Rights (2006-11) US$ 17m
	Norway Legal Aid and Advocacy BLAST (2003-07) US$ 193,000 **Norway** Legal Aid and Human Rights (2004-06) MLAA (2003-04) US$ 53,000
	Sweden Bangladesh National Women Lawyers Association (BNWLA) (2003/5) US$ 0.56 m
	UK (joint with EU and UNDP) Police Reform Programme (2004-07) Phase I **UK (**joint with EU and UNDP) Police Reform Phase II ongoing US$ 9.1m
12. Private sector *to prevent corruption involving the private sector, enhance accounting and auditing standards in the private sector and, where appropriate, provide effective, proportionate and dissuasive civil, administrative or criminal penalties for failure to comply with such measures.*	**ADB** Improvement of Capital Market and Insurance Governance TA Loan (2007-10) US$ 3,0 m
	UK State Owned Enterprises Programme (2003-04) US$ 40m **UK** Regulatory and investment systems for enterprise (2007-15) US$ 58m

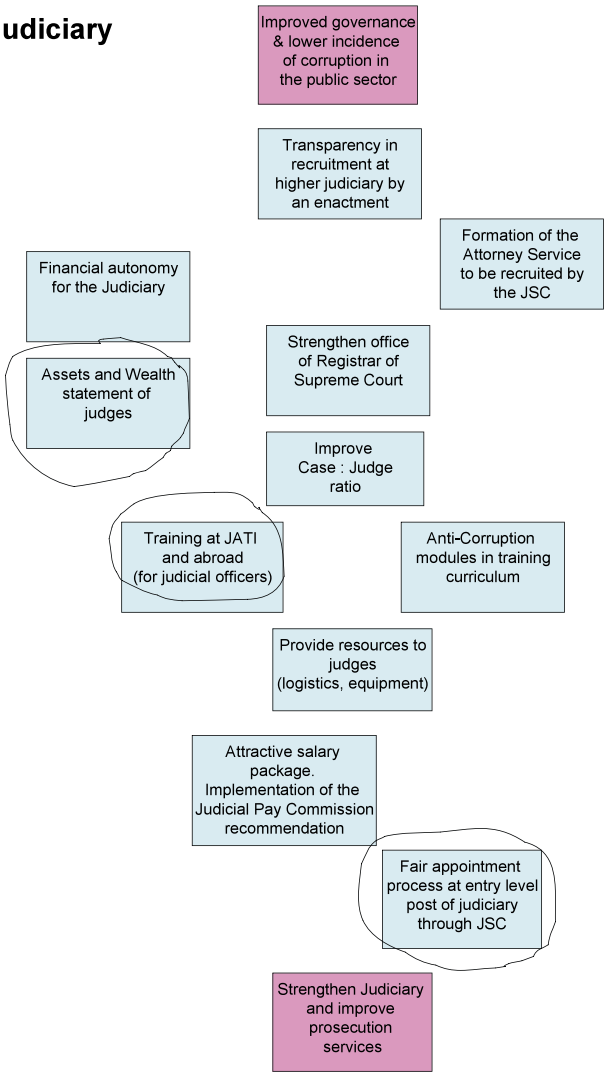
UNCAC Article & Headings	Donor Programmes
13. Participation of society *to promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and the fight against corruption and to raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption.*	**Denmark** Human rights and Good Governance Programme Phase 2, Component 2 Transparency & Accountability (2006-12) US$ 6,0 m **Denmark** Human rights and Good Governance Programme Phase 2- Component 3: Human Rights (2006-11) US$ 17m **Denmark** Strengthening Civil Society (2004- ongoing) US$ 29,644 **Denmark** Voter Cards with Photographs, (2007-10) US$ 918,679
	Norway Transparency International Bangladesh: Bridging Support (2001-05) US$ 48,737 **Norway** Making Waves, Transparency International Bangladesh (2003-06) US$ 1.4m **Norway** Promoting Gender Equity, Human Rights and Democracy (Good Governance) (2007-11), US$ 1,706,951 **Norway** Civil Rights Watch Programme, New Network (2002-05) US$ 330,000 **Norway** Legal Aid and Advocacy BLAST 92003-07) US$ 193,000 **Norway** Legal Aid and Human Rights (2004-06) MLAA (2003-04) US$ 53,000 **Norway** Gender and Human Rights (2003-06) **Norway** Samata (US$2.1) Co-funding with UK **Norway** Manusher Jono (HUGO fund) (2002-07) US$ 27m **Norway** Women's Rights (2007-09) US$ 112 577
	Sweden Bangladesh Centre for Development Journalism & Communication (BCDJ) (2003-05) US$ 0.556 m **Sweden** Centre for Policy Dialog (2004-05) US$ 374 353 **Sweden** Support to Centre for Policy Development (2003/5) US$ 0.28m **Sweden** Support to TI Bangladesh (2003/4) US$ 1.4 m **Sweden** The National Democratic Institute for International Affairs (NDI) (2003/4) US$ 0.14m **Sweden** Upazilla & Zia Election Observation (2003/4) US$ 210,000 **Sweden** Centre for Policy Dialog (2004-05) US$ 374 353
	UK Samata –2001-2008, US$ 9,300,000 **UK** Social Mobilisation Voice and Democracy,2001-2008, US$ 11,798,000 **UK** Economic Development Policy and Planning (Civil Society and Democracy) 2004- ongoing US$ 47,330 **UK** Access to information for greater participation and government accountability (2007-10) US$ 575,490 **UK** Fair Election Day Monitoring (2001/2) US$ 83,000 **UK** Asia Foundation Election Monitoring (2001-02) US$ 83,000 **UK** TAF Pre-Election (2001-2) US$ 158,000 **UK** National Integrity Programme Phase II: Support to TI Bangaldesh (2003-07) US$ 7m

UNCAC Article & Headings	Donor Programmes
14. Measures to prevent money-laundering *1. (a) Institute a comprehensive domestic regulatory and supervisory regime for banks and non-bank financial institutions …* *(b) … ensure that administrative, regulatory, law enforcement and other authorities … have the ability to cooperate and exchange information at the national and international levels*	
Criminalisation and law enforcement *Articles 15 to 42*	**ADB** Good Governance Programme (2007-12) US$ 150m
	Denmark Human rights and Good Governance Programme Phase 2 Component 1: Access to Justice (2006-11) US$ 8.9m
	Norway Legal Aid and Human Rights (2004-06) MLAA (2003-04) US$ 53,000
	Sweden Bangladesh National Women Lawyers Association (BNWLA) (2003/5) US$ 0.56 m
	UK (joint with EU and UNDP) Police Reform Programme (2004-07) Phase I **UK (joint with EU and UNDP)** Police Reform Phase II ongoing US$ 9.1m **UK** Public Access to Justice Project (2000-2005) US$ 8.3m **UK** Legal Aid and Services Trust (BLAST) (2003-2008) US$ 4.9m **UK** Accessible Justice Coordinator (2000-2004) US$ 0.4m
International cooperation *Articles 43 to 50*	
Asset recovery *Articles 51 to 59*	

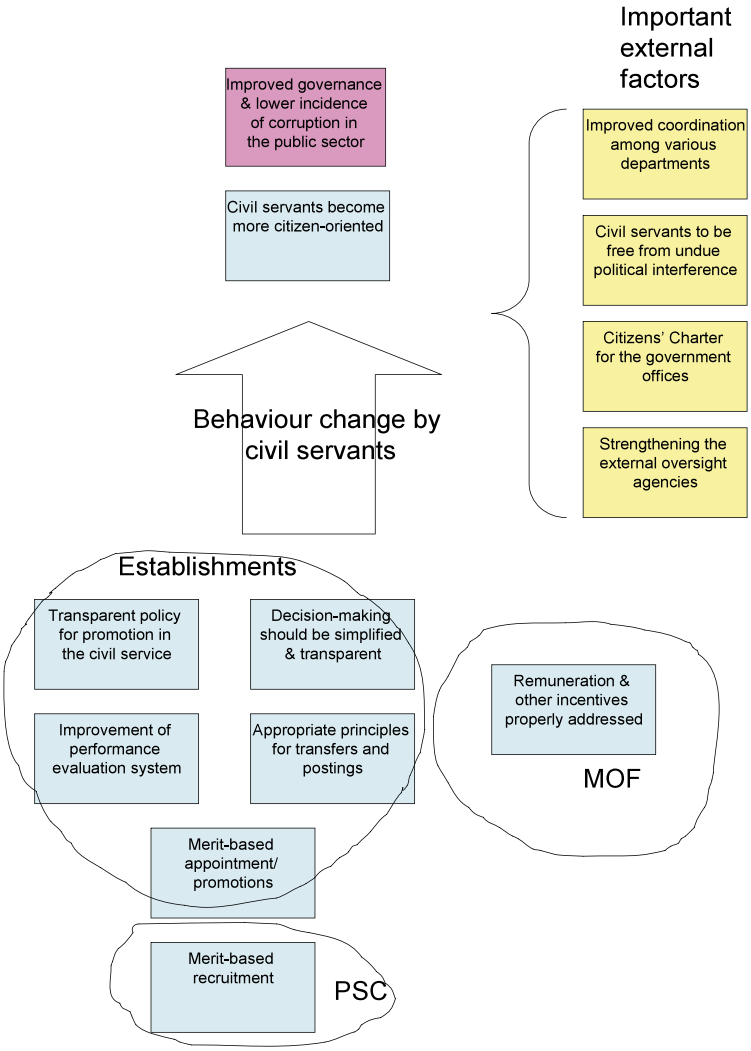
ANNEX 6:
Results from group exercise

The group exercise was used to brainstorm the understanding of participants about how interventions in the broad areas of civil service reform and justice sector reform would lead to declared programme goals. The diagrams reproduced below both reveal that participants have a good grasp of 'necessary' interventions, which includes understanding the need for complementary actions across government departments. It is also clear in the case of civil service reform that to generate the necessary behaviour change that will lead to desired outcomes, a range of 'environmental' issues will have to be dealt with such as strengthening external oversight agencies.

Judiciary



Civil Service Reform



ANNEX 7:
Country context Bangladesh

1 The state of corruption: perceptions, causes and cost

Overall picture

Bangladesh has recorded many impressive achievements in economic and social development over the last decade. It has attained steady economic growth of 4% to 5% annually, relatively low inflation and a stable domestic debt. More remarkable, have been the achievements in reducing income poverty and improving social indicators such as life expectancy, fertility control, child mortality, literacy and enrolment rates, which in many cases exceed other countries in the region and outside. This has happened in spite of natural disasters and weak governance, including corruption. The progress in social and economic development is in part due to effective management of the macro-economy, private sector-led growth, the use of new technologies (e.g. immunisation) and the contribution of NGOs to basic service delivery (i.e. education, health, water and sanitation). These gains have ameliorated failures in governance, particularly unstable politics, low public sector capacity, weak civil service and poor infrastructure.[1]

There is little doubt that concerns about governance, in particular corruption, continue to feature prominently in Bangladesh, both domestically and internationally. Corruption has affected all aspects of daily life and has become a feature of 'how things are done' for many private businesses, politicians, government officials and NGOs.[2] Grand and petty corruption is rife at all levels of society. This view is supported by internal donor documentation from 2006 and 2007.

While corruption and bribery are difficult, if not impossible, phenomena to measure empirically, there are a number of indicators that provide a general impression of the extent of corruption in Bangladesh.

Perceptions of corruption

International governance indicators such as the Transparency International (TI) Corruption Perceptions Index (CPI) and the World Bank Institute (WBI) Control of Corruption Indicator (COCI) support the view of a consistently high level of corruption in Bangladesh, showing some recent improvement. As Table A7.1.1 highlights, Bangladesh has managed to reduce somewhat the perceptions of systemic corruption and improved its CPI score from 0.4 in 2001 to 2.1 in 2008, on a scale of 0-10. While ranking at the bottom of the CPI list of countries for five consecutive years between 2001 and 2005, Bangladesh CPI ranks now 10th from the bottom in 2008 (with 30

1 DFID Bangladesh. November 2008. Internal documentation.
2 Duncan, A. et al. 2002 *Supporting the Drivers of Change.*

countries below compared with only four below in 2006). In the same position with the same score are three other countries – Kenya, Russia and Syria. With a score below 3, Bangladesh remains, however, a country highly challenged by corruption.

Table A7.1.1: TI CPI, Bangladesh, 2001-08

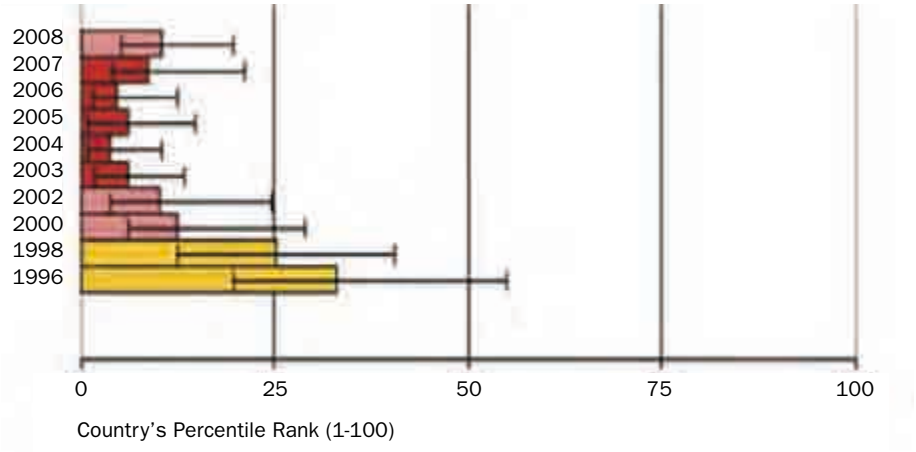
	2001	2002	2003	2004	2005	2006	2007	2008
Score	0,4	1,2	1,3	1,5	1,7	2	2	2,1
Bangladesh rank from below	1	1	1	1	1	3	7	10
Rank (absolute)	91	102	133	145	158	156	162	147
Total number of countries included in CPI	91	102	133	145	158	163	180	180

Note: Scale 1-10, the lower the score the higher the perceptions of corruption. Scores below 3 indicate countries with rampant corruption.

Source: Transparency International Bangladesh, 2008.[3]

The WBI COCI also confirms that Bangladesh is positioned among the most corrupt countries in the world, with sharp increases in corruption between 1996 and 2004 and some improvements since then. Today, Bangladesh's COCI is -1.10, on a scale of -2.50 (*high corruption*) to +2.50 (*low corruption*). Only 10.6% of countries world-wide have lower COCI scores and Bangladesh is the second most corrupt country in South Asia, just after Afghanistan (see Figure A7.1.1).

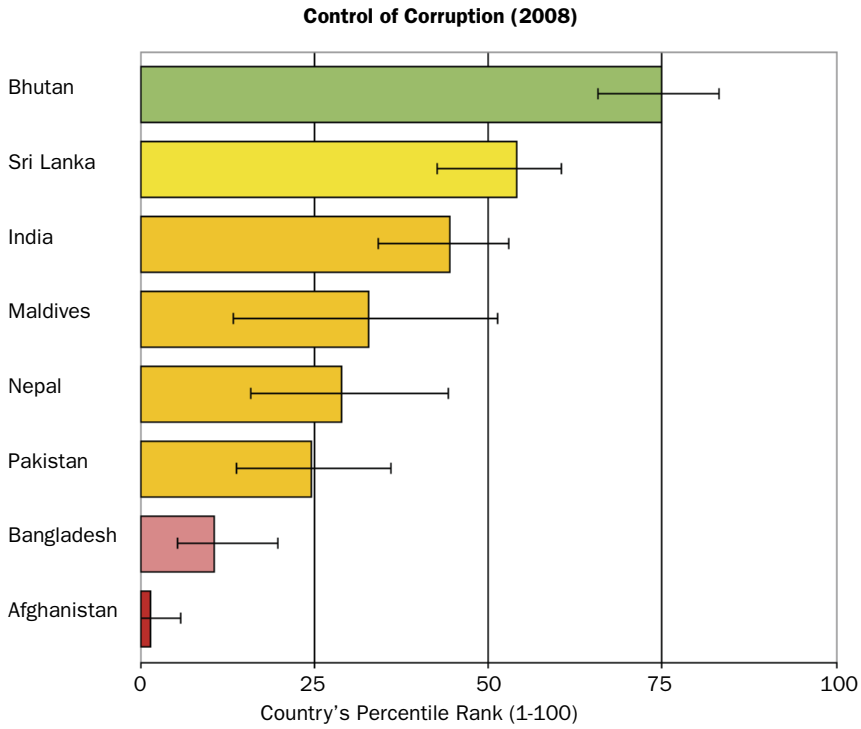
Figure A7.1.1: WBI Governance Indicators: COCI, Bangladesh, 1996-2008



Source: Kaufmann, et al. 2009.[4]

3 Based on the outcomes of the TIB CPI for the years 2001 until 2008.
4 Kaufmann, D., Kraay, A. and Mastruzzi, M. 2009 *Governance Matters VIII. Aggregate and Individual Governance Indicators 1996-2008*. Washington DC: The World Bank.

Figure A7.1.2: WBI Governance Indicators: COCI, Bangladesh compared to other South Asia countries, 2008



Source: Kaufman D., A. Kraay, and M. Mastruzzi 2009: Governance Matters VIII: Governance Indicators for 1996-2008
Note: The governance indicators presented here aggregate the views on the quality of governance provided by a large number of enterprise, citizen and expert survey respondents in industrial and developing countries. These data are gathered from a number of survey institutions, think thanks, non-governmental organizations, and international organizations. The WGI do not reflect the official views of the World Bank, its Executive Directors, or the countries they represent. The WGI are not used by the World Bank Group to allocate resources.

Source: Kaufmann, et al. 2009.[5]

While the results of TI and the WBI cannot be ignored, consideration should be given to the fact that both indicators are (partly) based on perceptions of enterprises, citizen and other expert survey respondents. Bangladeshi citizens are traditionally outspoken and there is a free press and active civil society.[6] Hence, perceptions of corruption may be higher in Bangladesh because people feel free to talk about it compared to other, less open, countries.

Causes of corruption

Key drivers of corruption in Bangladesh are plural and highly intertwined. A winner-takes-all political system has emerged in Bangladesh, where politics have become confrontational and centralised, tending to be more driven by wealth and personality than by issues. This has challenged the checks and balances of the political process. The bureaucracy and politics are highly intertwined where public institutions have become partisan throughout their operations and structures. Inadequate controls over the use of public resources, absence of appropriate rules and regula-

5 Ibid.
6 This is only a relatively recent phenomenon, emerging through the growth of numerous privately-owned satellite TV channels, among other things, to the electronic media. Some private TV channels are owned by owners of the large business entities that have wide access to the country's power structure and membership with political parties. As a reversal to the advantage of voicing peoples' thoughts and preferences over the media, in some instances it is reported that these channels broadcast news and other programmes based on doubtful credibility.

tions, weak professionalisation in recruitment and training and low salaries all have contributed to providing incentives for public sector corruption. The institutional capacity and independence of formal oversight functions (e.g. C&AG, ACC, Election Commission, PSC) have been systematically diluted. Although Bangladesh has a free press and active civil society, there is an overall lack of citizen empowerment to hold the government to account. Corruption is notable in sectors such as land, police, education, health, the judiciary and financial services. As a result, the social contract between the State and the wider public and the quality of public service delivery have been undermined.[7] A more detailed picture of the role of these actors (state and non-state) in the process of tackling corruption is provided in Section 2.

Costs of corruption

There is a direct link between the 'cost' of corruption and the incidence of extreme poverty. Corruption reduces economic growth and slows the pace of poverty reduction. The poor tend to be disproportionately affected by corruption e.g. by limiting their access to services. The World Bank indicates that, if Bangladesh had reduced corruption in the 1990s to the levels seen in Poland, annual growth could have increased by around 2%. Bangladesh's Vision 2020, in turn, estimated that an extra 2% to 3% increase in annual economic growth could cut the incidence of extreme poverty from 36% to about 11% by the year 2020.[8]

The Business Anti-Corruption portal reports that the biggest constraint to investment in Bangladesh is corruption, with 85% of businesses expecting to pay bribes in order to 'get things done' (the example of Siemens is highlighted shortly). Small to medium enterprises suffer most from corruption, as they devote proportionately more resources and time to dealing with it than do larger companies.[9]

Political corruption

Since Bangladesh's independence, there is evidence that the majority of political rulers and business elites have been accused of either direct or indirect involvement in large-scale corruption, in particular granting political and financial benefits to close relatives and associates, extortion and bribery.[10] A study undertaken by TIB in 2005 showed that high-level public officials were more likely to be involved in corrupt practices than subordinate staff.[11] During the recent military-backed Caretaker Government period (2006-08), issues of widespread corruption were brought to the surface. Former government leaders (Zia and Hasina) together with other high-ranking politicians were charged with large-scale corruption and murder and exiled. They have since returned to the country.

A few high-level officials have been tried and found guilty on charges of corruption. For example, the State Minister for Labour and Employment in the previous administration of Zia, Amanullah Ama, was found guilty on charges of extortion, illegal

7 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC; Institute of Governance Studies. 2008. *The State of Governance in Bangladesh 2007: Expectations, Commitments, Challenges*. Dhaka: BRAC.

8 DFID Bangladesh. 2007. Internal documentation.

9 Business Anti-Corruption portal, Bangladesh Country Profile. Retrieved 3 May 2011 from www.business-anti-corruption.com/country-profiles/south-asia/bangladesh/snapshot/

10 Khan, M.M. 1989. The Electoral Process in Bangladesh. *Regional Studies*, 7(3), 95-111; Khan, M.M. and Zafarullah, H.M. 1979. The 1979 Parliamentary Elections in Bangladesh, *Asian Survey*, *19*(10), 1023-1036; Kochanek, S.A. 1983. *Patron-Client Politics and Business in Bangladesh*. Dhaka: UPL; Franda, M. 1982. *Bangladesh: The First Decade*. New Delhi: South Asian.

11 TIB. July 2006. *Corruption Database Report 2005*.

land acquisition and assisting businessmen to receive large government contracts. Abdul Kader Mollah, a sales assistant for the largest state-owned gas company Titas Gas Distribution Company, was caught having used his position to skim off US$145 million.[12] Arafat 'Koko' Rahman, the son of former Prime Minister Khaleda Zia and a prominent businessman, was formally charged with laundering nearly US$2 million in kickbacks, including US$180,000 from the Siemens Corporation. Arafat and his brother Tarique, although allegedly at the centre of many corrupt deals in Bangladesh, were considered untouchable between 2001 and 2006 when their mother held office. Both brothers were arrested in 2007 under the Caretaker Government and are currently on bail as more charges are framed against them. Since the parliamentary elections in December 2008, it remained to be seen whether action was taken against them.[13]

Public sector corruption

There is a vibrant and stable multiparty system. Although there are a large number of political parties, electoral politics is dominated by two parties (Awami League and the Bangladesh Nationalist Party). A winner-takes-all political system has emerged in Bangladesh, where politics have become highly centralised and personalised with a limited role for the opposition.

Politicisation of the executive and corruption

The politicisation of the bureaucracy

Public institutions whose rules or mandates forbid party affiliation have become partisan. There is evidence that recruitment, promotion, transfer and retirement policies and processes are all influenced by political decisions rather than based on merit and civil service rules and regulations. This process has particularly accelerated since the 1990s with the demise of the role of the military.

Corruption in public service delivery

Political considerations influence the functioning of all government sectors and hence of service delivery. A particular risk area is corruption in the awarding of public and private tenders. Collusion between political leaders and bureaucrats in public contracting is an ever present risk.

A study undertaken by TIB in 1997 and 2000 reviewed the number of reported cases of corruption in the media as a proxy for the extent of corruption in various sectors (see Tables A7.1.2 and A7.1.3)

12 Global Integrity Initiative, Global Integrity Scorecard Bangladesh, 2008.
13 Montero, D. 1 April 2009. *Bangladesh: Following the Siemens Bribery Trail.* PBS. Retrieved 3 May 2011 from www.pbs.org/frontlineworld/stories/bribe/2009/04/bangladesh-following-the-siemens-bribery-trail.html

Table A7.1.2: Distribution of reported cases of corruption in the media, 1997 and 2000

	1997 (January-March	2000 (January-June)
Police, BDR, Ansar, etc.	46%	30%
Local government	13%	17%
Education	10%	16%
Health	5%	11%
Taxation (income, customs, VAT, etc.)	6%	6%
Financial institutions (banks, non-formal micro-credit)	7%	6%
Forestry	4%	6%
Water (including Water Board)	4%	5%
Transport (including Water Transport)	4%	2%
Sub-total	390 (100%)	927 (100%)
Others	(188)	(418)
Total (N)	578	1345

Source: Transparency International Bangladesh.

Table A7.1.3: Manifestation of corruption by types and sector (2000)

	Misuse of Power	Bribe Taking	Embezzlement and Extortion	Misuse of Resources	Negligence of Duty
Police, BDR, Ansar, etc.	48%	20%	12%	1%	18%
Local government	18%	5%	58%	8%	8%
Education	22%	9%	49%	7%	11%
Health	20%	6%	42%	5%	26%
Taxation	34%	30%	30%	-	6%
Financial institutions	26%	4%	67%	-	4%
Transport	37%	12%	27%	10%	14%
Water	17%	5%	52%	25%	-
Post, telegraph, telephone, telecom	28%	23%	25%	10%	13%
Land administration	22%	38%	31%	3%	6%
Forestry and the environment	24%	20%	39%	12%	5%

Source: Transparency International Bangladesh.

The study concluded that the most corrupt sectors were the police and armed forces followed by local government, education and health. The most applied corrupt practices were thought to be embezzlement and extortion, misuse of power and taking bribes.

This picture had somewhat changed by 2007. The IGS gathered data on citizens' perceptions of corruption in the various public institutions on a scale of 1 (being *least corrupt*) and 5 (being *highly corrupt*). The survey found that all public sectors are perceived to be corrupt. Respondents identified electricity, police and customs as the top three corrupt sectors, followed by income tax and roads and highways departments. Education, banking and the judicial system were identified as less corrupt compared to other sectors. It is also notable that the perception of professionals of the extent of corruption is higher than that of the general public. There are no significant differences between the urban and rural areas. Men's perception of corruption is generally higher than that of women except when dealing with the private sector (see Table A7.1.4).

Table A7.1.4: Mean score on the level of corruption in various public services and institutions

		General public				
Sectors	**Professionals**	**Total**	**Urban**	**Rural**	**Male**	**Female**
Electricity	4.3	4.0	3.9	4.1	4.1	3.9
Police	4.1	3.9	4.0	3.8	4.0	3.8
Customs	4.2	3.7	3.7	3.7	3.9	3.6
Income tax	4.1	3.7	3.7	3.8	3.9	3.5
Roads and highways	4.0	3.6	3.6	3.7	3.8	3.5
Local government	3.6	3.3	3.4	3.3	3.4	3.2
Health services	3.7	3.2	3.3	3.3	3.4	3.1
Judicial system	3.5	3.2	3.3	3.2	3.3	3.1
Private sector	2.8	2.8	2.9	2.8	2.8	2.9
Banking	2.9	2.8	2.7	2.8	2.8	2.7
Public education	2.8	2.3	2.4	2.3	2.4	2.3

Note: using a scale from 1-5 (1 being least corrupt and 5 being highly corrupt)
Source: The Institute of Governance Studies Survey: Perception on corruption.

The Social Sector Performance Surveys in health and education of 2006 provide some further insights into the nature of corruption in the social sectors. Their overall conclusions were that "*while there were problems, including of corruption or leakage and poor quality services, the provision of health and education services was found to be reasonably effective within their given goals and resource constraints*".[14]

14 FMRP. January 2007. *Governance, Management and Performance in Health and Education Facilities in Bangladesh: Findings from the Social Sector Performance Qualitative Study.* Dhaka.

The studies identified several ingrained practices that amount to corruption:

- the demand by officials, particularly in accounts offices, for 'speed' money (unofficial bribes) to process routine transactions
- payments by teachers to facilitate recruitment and promotion
- losses of drugs at facility level (through comparing official records with patient feedback)
- falsification of records to attract payments under the primary and secondary education stipends programme
- teachers and, more especially doctors, carrying out private work in public time.

Another study undertaken by TIB in 2008 confirms many of the conclusions of the Social Sector Performance Surveys and adds that corruption in the education sector also often relates to the distribution of stipends, the collection of fees/subscriptions from students, buying of teaching-learning materials, corruption in recruiting and training of teachers. Corrupt practices and irregularities are reported to take place at school level and administrative level (i.e. Upazila Education Office).[15]

A number of other studies have been undertaken by civil society and donors to identify in more detail the trends, causes and costs of corruption in specific sectors. To menton a few, these studies included (most are only available in Bangla):

- *Good Governance in the Water Resources Sector: Need Transparency and Accountability.* March, 2009: TIB.
- *Role of BRTA and Other Stakeholders in Road Transport System in Bangladesh: Challenges and Remedies.* March, 2009: TIB.
- *Forest Conservation and Management.* August 2008: TIB.
- *Study on Chittagong Customs.* June, 2008: TIB.
- *Independent Audit of Roads and Highways Department of the Ministry of Communications.* DFID.

Local government, politics and corruption

A study undertaken by TIB in 2005 highlighted that, among the elected public representatives, the Union Parishad chairmen were directly involved in 43.5% of reports of incidents of corruption. Besides, the Union Parishad members (27.1%), municipal chairman (11.8%), members of parliament (8.2%), ministers (4.7%), ward commissioners (1.8%) and mayors (1.2%) were directly involved in the reported stories of corruption.[16]

Politicisation of the judiciary and corruption

International and national agencies such as Human Rights Watch and Ain O Shalish Kendra have reported on systematic political influence exercised on the enforcement of law and politically motivated uses of lower judiciary (false prosecution and selective bail) for the purpose of intimidating political activists. A report by Human Rights Watch from May 2009 reports that the involvement of soldiers, paramilitary officers and police in so-called 'crossfire

15 TIB. July 2008. *Administration and Management of Primary Education: Problems and the Way Out*.
16 TIB. July 2006. *Corruption Database Report 2005*.

killings' and other custodial killings, torture, disappearances and arbitrary arrests is systematically not prosecuted.[17]

High Court judges have been increasingly recruited on the basis of political allegiance. The IGS *State of Governance Report* provides a vivid example:

According to the law, based on the 13 amendment of the Constitution, the immediate past Chief Justice will be the head of the interim Caretaker Government. This has created strong incentives for the Government to nominate judges to the Appellate Division who were perceived to be loyal to the government, since Chief Justices are selected from among Appellate Division judges.[18]

The Business Anti-Corruption portal highlights that business-to-business corruption is not illegal, that lawsuits and commercial disputes are often delayed and parties are subsequently encouraged to pay 'speed money' in order to obtain a ruling. Companies involved in legal disputes generally try to avoid the lower courts due to the high frequency of corruption at this judicial level.[19]

Corruption in the police force is widespread. In their most recent household survey, TIB found that the majority of households had to pay bribes when lodging first information reports at police stations, when registering general diaries and when requesting clearance certificates.[20] In the absence of any strong accountability mechanisms, incentives are strong for police officers to continue with corrupt practices.

Corporate corruption

Business and politics have increasingly become intertwined in Bangladesh. The last two decades saw the growing presence of a business elite in the major political parties and in parliament. Political parties actively seek out wealthy businessmen for party nominations. Eventually some of them become leaders of different chambers and other government bodies, thereby cementing a close link between politics and business. The reasons for this close nexus between politics and business are quite straightforward:[21]

- Successful entrepreneurs have the financial resources required to finance electoral competition.
- The entry of business into politics becomes a business investment. It assures access to state resources, gives a competitive edge over business rivals and establishes influence over the policy process. Businessmen involved in big infrastructure contracts may also choose to affiliate with an incoming ruling party to protect against the fallout from involvement in corrupt deals with the past regime. The treatment of politics as a business investment has been discussed openly during the ongoing civil society campaign led by the Centre for Policy Dialogue to 'cleanse' the electoral process.

17 Human Rights Watch. May 2009. *Ignoring Execution and Torture*.
18 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC.
19 Business Anti-Corruption portal, Bangladesh Country Profile. Retrieved 3 May 2011 from www.business-anti-corruption.com/country-profiles/south-asia/bangladesh/snapshot/
20 TIB. 2007. *Household Survey*.
21 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC.

- Politicians have the advantage in succeeding in business due to preferential licenses and other advantages that accrue to members of a ruling party.

Corruption in state-owned enterprises is particularly grave. Studies undertaken by TIB in the natural gas, airline and power sectors indicate that the prevalence of corruption is high. Accountability mechanisms are weak or absent, where company board members are often government officials and inadequate administrative and financial autonomy exists. For example, in the gas sector there is corruption in providing gas connections to customers, in meter reading, meter by-passing, the illegal establishment of connections and in road cutting permission.[22] In the airline sector, there is corruption in the purchase and leasing of aircraft, store and purchase of spare parts, in the tender process and in ticketing and reconfirmation.[23] The procurement process of equipment is the key area of corruption in the power sector. This manifests itself in extortion in the bidding process, ex-aggregate valuation of bid value, improper technical and commercial evaluation, inserting clauses favourable to a specific company, approval of local public works without any tender in collusion, etc.[24]

Corruption in NGOs

NGOs have historically played a very important role in Bangladesh and their rapid expansion reflects the success they have had in delivering services to the poor. In recent years, however, the NGO sector itself has come under increasing attack for weak governance.

A major challenge facing NGOs is the lack of strong governance structures and procedures. The IGS *Corruption Perception Survey* of 2007 shows that nepotism is also quite common in NGOs. 20% of NGO respondents reported that their organisations have board members from the same family.[25] Also a recent TIB study confirmed that there was corruption in recruitment and promotion in some NGOs.[26]

Another major challenge faced by NGOs is the interference in the internal affairs of NGOs – particularly in recruitment and programme administration – by influential people and local government officials. As the IGS study confirmed, transactions with the government often involve demands for bribes or 'illegal' taxes, payment of which can lead to opacity in financial reporting. The TIB study on governance in the NGO sector highlighted also that many NGO high officials avoid income tax.[27]

2 National AC mechanisms

The National Integrity System: main actors and mechanisms

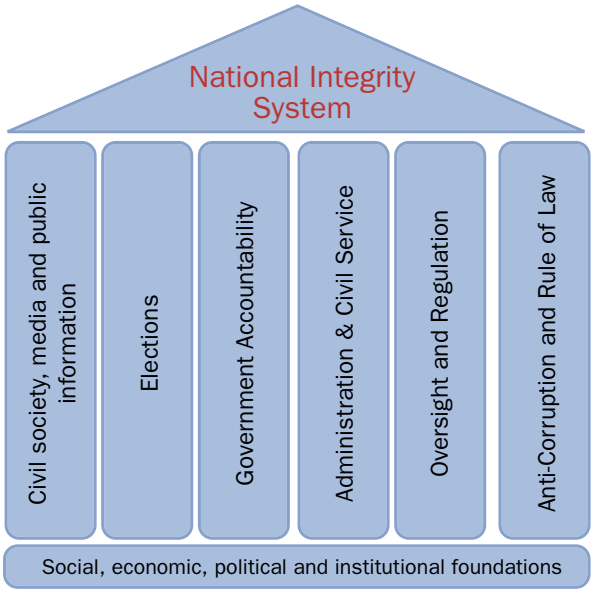
Key to tackling corruption is a proposed NIS that provides effective safeguards against the abuse of power, malfeasance and misappropriations. In the absence of appropriate regulations, transparency and accountability mechanisms, corruption is

22 TIB. August 2008. *Corruption in Distribution and Marketing of Natural Gas in Chittagong Region: A Case Study on Bakhrabad Gas System Limited*.
23 TIB. August 2007. *Biman Bangladesh Airlines: A Diagnostic Study*.
24 TIB. n.d. *Performance of the Power Sector of Bangladesh: Governance Failures and Remedial Measures*.
25 Institute of Governance Studies. 2008. *The State of Governance in Bangladesh 2007: Expectations, Commitments, Challenges*. Dhaka: BRAC.
26 TIB. 2007. *Problems of Governance in the NGO Sector: The Way Out*.
27 Ibid.

likely to thrive with negative effects for society at large and for equitable growth, sustainable development and social cohesion. Strengthening an NIS promotes better governance across all aspects of society.

To depict the main actors and institutions in Bangladesh's NIS, we use the framework underlying the Global Reporting Index (GII) (see Figure A7.2.1).

Figure 7.2.1: Main pillars of Bangladesh's proposed National Integrity System



Source: Global Integrity Index reporting.

The GII judged the quality of Bangladesh's Global Integrity System as *weak* in 2007 and 2008. Other countries in the region, such as India and Pakistan, have an NIS with more *moderate* capacity to tackle corruption (see Table A7.2.1).

Table A7.2.1: Global Integrity Report Indicators for Bangladesh, India and Pakistan, 2007 and 2008

	2007			2008		
	Bangladesh	**India**	**Pakistan**	**Bangladesh**	**India**	**Pakistan**
Legal framework	79	88	92	84	n.a.	94
Actual implementation	46	64	50	52	n.a.	52
Implementation gap	32 (*very large*)	24 (*large*)	42 (*huge*)	31 (*very large*)	n.a	42 (*huge*)
Overall GI rating	64 (*weak*)	75 (*moderate*)	70 (*weak*)	68 (*weak*)	n.a.	72 (*moderate*)

Notes: Integrity indicators assess the legal framework of national-level AC safeguards, then determine how well that framework is working, and whether all citizens can actually use it. The scale for all scores is from 0 (bad) to 100 (good).

Overall GI Rating: The higher the overall GI rating, the stronger the national integrity system.

Source: Global Integrity Index reporting.

Evolution of government commitment

Government commitment to tackle systematic corruption in Bangladesh has been mixed since independence, regardless which of the two main parties (Bangladesh Nationalist Party or Awami League) was in power. Since 2005, the GoB has articulated priorities around good governance and corruption in the National Strategy to Accelerate Poverty Reduction (NSAPR), both NSAPR I (2005-08) and NSAPR II (2009-11) (see Table A7.2.2). Notably, the good governance agenda has been widened in NSAPR II putting a greater focus on the role of parliament, reforming public service and law enforcement agencies, ensuring human rights, and promoting e-governance. The strategic priorities on AC have stayed more or less the same.

Table A7.2.2: Good governance and AC priorities according to NSAPR I and NSAPR II

	NSAPR I (2005-08)	NSAPR II (2009-11)
Pillar	***Supporting Strategy 2: Promoting good governance***	***Supporting Strategy 2: Promoting good governance***
Strategic good governance priorities	• promoting local governance • strengthening the AC Strategy • reforming criminal justice and enhancing access to justice for the poor • improving implementation capacity • improving sectoral governance	• making parliamentary process effective • reforming and strengthening the public service system • reforming the legal and judicial system to ensure judicial help for the poor and women • changing roles of law enforcing agencies • strengthening of local government • promoting e-governance • combating corruption • ensuring human rights • accessing information • improving project implementation capacity • improving sectoral governance
Specific strategic AC priorities	• three pronged approach: deterrence, system improvements and value-creation • fast-tracking operationalisation of the ACC • continuing reforms in financial management • strengthening oversight functions both at apex levels, such as parliamentary standing committees, Auditor General, and proposed offices of ombudsmen, as well as within routine administration • strengthening and enforcing codes of conduct within the electoral process • targeted transformation of recruitment and human resources institutions to ensure a higher level of administrative quality • strengthening information flows, leading to 'right to information' legislation	• short-term: enforcement and sanctions against corruption • medium-term: strengthen core institutions of governance, including the ACC, Judiciary, Election Commission and PSC • long-term: public awareness and education in preventive measures; compliance with UNCAC • other: improving transparency of public spending; citizen right to information

Source: NSAPR I and NSAPR II.

The GoB's progress in implementing the strategic AC priorities and reforming the NIS has been slow with main initiatives being driven by donor support and donor priorities. This seemed to change for a while during the two-year term of the military-backed Caretaker Government between 2007 and 2008. During that time, the Caretaker Government introduced a number of reforms within Bangladesh NIS and a general sense of having developed broken with the past. The Caretaker Govern-

ment demonstrated a strong AC drive. It did not have a comprehensive strategy to tackle corruption but did initiate a number of crucial reforms in Bangladesh's NIS. These are summarised in Box A7.2.1. More details on the achievements and challenges in Bangladesh NIS are presented in the next section.

Box A7.2.1: Main highlights of the recent Caretaker Government AC interventions

- signing of the UNCAC in February 2007
- reconstitution and strengthening of ACC; giving it additional investigative powers
- setting up of special tribunals to try cases of corruption, money laundering and terrorism
- reforms initiated in important institutions like the Election Commission and PSC and the police with attempts to free them afrom political influence and promoting effective independence
- formation of Financial Intelligence Unit by Bangladesh Bank, with sophisticated software and techniques to identify financial crime
- decision taken on the formation of National Human Rights Commission
- increasing transparency and accountability in the budget and procurement processes, government auditing and customs and tax administration (PFM reforms are ongoing)

Source: NSAPR II, *Moving Ahead, 2009-2011.*

Many of these Caretaker Government reforms, however, still need to be ratified by the new parliament. Parliamentary elections took place in December 2008 and it is currently too early to say which stand the new administration will take and whether the momentum generated during the Caretaker Government term will continue. The new administration expressed its good intentions early on, however. After the oath-taking ceremony in Parliament, Prime Minister Sheikh Hasina called upon Parliament and the new administration to learn lessons from past mistakes and to work together with honesty and integrity. She declared that due action will be taken against anyone found to be guilty of corruption, but that no one should be treated unjustly. She stressed that no one shall be above the law, not even ministers. She also promised to keep the administration free from politicisation.[28]

Notable among the Acts passed during the first parliamentary session were the following: the Citizenship (Amendment) Act 2009, Money-laundering Prevention Act 2009, Anti-terrorism Act 2009, Right to Information Act 2009, Consumer Protection Act 2009 and the Code of Criminal Procedure (Amendment) Act 2009. However, a number of ordinances that could play a vital role in ensuring transparency, good governance and human rights are still pending, which included the ACC (Second Amendment) Ordinance 2007, National Human Rights Commission Ordinance 2007, Micro-credit Regulatory Authority Ordinance, Public Procurement Act (Amendment) 2007, Government Attorney Service Ordinance 2008, Supreme Judicial Commission (Amendment) Ordinance 2008, and the Mobile Court Ordinance 2007. A more detailed look at the role of these legislations was during the country visits.[29]

28 TIB. Parliament Watch 2009. *Report on Observation of the First Session of the Ninth Parliament, 2009*.
29 Ibid.

Major achievements and challenges

Civil service reform

Since independence, progress in civil service reforms has been extremely slow in Bangladesh. Numerous reform committees and commissions have been established under successive governments to advise on civil service reforms. According to the Report of the Public Administration Reform Commission (2001), "*due to various constraints, the recommendations of those commissions and committees were either partially implemented or ignored totally. Consequently, the administrative structure has remained almost the same as it was during the colonial period*". Although the momentum for reforms increased temporarily in the years during the Caretaker Government, 8 years later, the PARC Report is still used as the main reference for government action.

Recruitment: Following a long period of criticism, the PSC[30] was reconstituted in 2007 and the 27th Bangladesh civil service examination cancelled, in response to widespread allegations of fraud. Under the new chairmanship, exam procedures have been made more robust and transparent.[31] These changes have helped to increase public confidence in the Bangladesh civil society recruitment system.[32] Yet more substantial reforms – such as abolishing and/or revising the quota system and revising the recruitment policy of PSC's in-house employees – have yet to take place. The ADB concludes in its November 2008 tranche release report that "*proposals to review the recruitment quota system have been studied although it will require substantial political commitment to get this reform through*".

Transfer and promotion: The main advancements noted over the evaluation period, outside that of containing the overall size of civil service, was the establishment of a Career Planning and Training Wing career prospects. A Human Resources Management Committee was installed under the Ministry of Establishment in August 2007. This committee met regularly until late 2008, producing a number of recommendations, including establishing transparent promotion rules; replacing the Annual Confidential Report with a performance-based evaluation system; and linking up core course training with promotion. This committee is no longer active and the new government has failed to take up any of its recommendations. Business has continued as usual: promotion policy within the cadre system remains confidential and the Ministry of Establishment has continued the practice of frequent staff transfers.

Ethics: Asset declaration and grievance procedures are two mechanisms by which public sector integrity can be enhanced. As part of the ADB-supported GGP, the Cabinet Division has issued a circular to all public servants on asset declaration requirements; the procedures for handling complaints have been revived and

30 A major actor in ensuring integrity is the PSC. According to the Constitution, Articles 137-141, the PSC is assigned the role of selecting the most competent persons for the public service through competitive examinations and tests in a fair and transparent manner and of providing advice on recruitment rules, promotions, transfers and other public service matters. However, in practice, the PSC has been highly criticised for a lack of independency and capacity and a high degree of politicisation undermining its credibility as a watchdog. As a 2007 TIB study highlights, although legally the PSC is independent, the secretariat is under the control of the executive and the Ministry of Establishment influences internal procedures for recruitment, disciplinary and administrative issues. The criteria for appointment of the Chairman are not clearly defined and appointments of the Chairman and other members of the PSC have been criticised on partisan grounds. There are no accountability mechanisms between chairmen and members and limited meaningful reporting on the PSC activities. In addition, the PSC is faced with serious capacity issues including a lack of qualified staff and incentives for merit-based promotion. TIB emphasises that the examination system is archaic and outdated, lacking the scope for proper assessment of the competency of candidates. Because of a lack of transparent assessment criteria for examinations, there is scope for irregularities and corruption in the recruitment process. There have been blatant examples of partisan recruitment in important cadres like the administration and the police.

31 Changes included: replacing oral examination with written examinations; giving candidates the right to know their scores; more robust use and screening applications forms.

32 Workshop.

strengthened in at least 50% of line ministries; and the GoB has publicly announced its decision to establish a national Office of the Ombudsman, as provided for by the Constitution. However, the lack of whistleblower protection mechanisms remains an important gap in Bangladesh's legal framework and is seen as a threat for civil servants and NGOs alike.

Wage bill: With regard to pay policy, the current government pay scale was based on recommendations of the 6th National Pay Commission Report in 2005. Since then, ad hoc increments of salaries have taken place, with a significant discrepancy between the private and public sector. There is still no single, overall database of all civil servants in Bangladesh on the government payroll.

Civil service reform in Bangladesh has not been addressed comprehensively. Political commitment to push through essential reforms is lacking. Donors have recently hardened their stance, insisting that it was time for the GoB to take action. In response, the Ministry of Establishment produced a working paper in late 2009, highlighting the current thrust for civil service reforms; existing and planned reform initiatives; and, existing donor programmes. Future action planned over 6-12 months included the formulation of a Civil Service Act; the finalisation of policies related to promotion, transfer and placement; improving the personnel database management system; developing a performance-based evaluation system, reforming field administration; renaming and re-defining the role of the Ministry; and clustering ministries.

Civil service reforms are not only required to promote integrity in public life and provide a citizen-oriented public administration but also to address what has been identified as a main barrier to reform. For example, as noted in FMRP impact assessment:

> *Financial management reforms are taking place in isolation from much needed complementary reform programmes, such as improving the efficiency and effectiveness of the civil service. Several aspects of performance improvement, essential for the financial reforms to progress, remain absent. For example, the weak human resource management function, the frequent transfers of staff and the operation of the cadre system persist as barriers to reform. [...] Unless these constraints and challenges start to be addressed, financial management reform in Bangladesh is unlikely to progress beyond incremental, technical enhancement to business procedure.*

Public financial management: Important gains in PFM have been made over the last decade. These are:

- the introduction and roll out of Medium Term Budget Frameworks
- modernisation of the accounting process through the introduction of the iBAS system
- strengthening of the external audit function of C&AG.

Various studies have been commissioned to assess progress against the main stages of the PFM cycle. In the absence of a Public Expenditure and Financial Accountability (PEFA), proxy indicators were used to assess the credibility of the

budget, comprehensiveness and transparency, and the budget cycle (policy-based budgeting; predictability and control in budget execution; accounting, recording and reporting; and external scrutiny and audit). These studies show that the impact of these advancements have been offset by continuing deficiencies in key areas. Budget formulation and accounting processes have improved. Yet account reconciliation remains weak.

Budget execution is weak because of low tax enforcement, weak payroll control, and non-compliance to procurement rules and regulations.

Civil society, media and public information

The *Global Integrity Index 2008* (see Table A7.2.3) shows that Bangladesh scores *very weak* on the role of civil society and public access to information. The main factors underlying this low scoring include the fact that CSOs are not free to report on AC issues without frequently being harassed and their personnel even killed. By the end of 2008, citizens did not have the right to information, although this has now changed since 2009, at least officially. The media can operate freely and independently to a moderate extent but regulatory barriers exist. More information is detailed in the following section.

Table A7.2.3: Civil society, media and public information GII Bangladesh scorecard 2008

Indicator	Dimension	Score	
I-1	Civil society organisations	57	*very weak*
I-2	Media	72	*moderate*
I-3	Public access to information	32	*very weak*

Source: Global Integrity Index 2008, Global Integrity Scorecard: Bangladesh.

Scale: (< 60) *very weak*, (60+) *weak*, (70+) *moderate*, (80+) *strong*, (90+) *very strong*

Civil society organisations

The role of CSOs is well recognised in the struggle to promote better governance and fight corruption. They can contribute to creating transparency, promote demand for accountability and provide a platform for marginal voices and the poor. Thereby they can become important watchdogs in society.

NGOs and other CSOs have traditionally played a crucial role in the fight against poverty in Bangladesh and aid financing to NGOs, as a share of total aid, has grown steadily from 14% in the 1990s to about 25% in 2006.[33] The focus of their activities has evolved from social mobilisation in the 1970s towards service delivery since the 1980s, complemented by an increased emphasis on promoting advocacy activities by the 1990s. Since then, NGOs have matured and gained the confidence to tackle a wide range of governance issues including transparency, electoral reform and human rights.

33 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC.

Local governance has featured high on the agenda of CSOs and society activism on governance has exploded over the past decade. CSOs increasingly use research and policy analysis as advocacy tools and to influence policymakers. The Centre for Policy Dialogue and the IGS provide valuable contributions to the public discourse on the annual situation in Bangladesh. TIB managed, since the mid-1990s, to dramatically raise awareness about the endemic state of corruption in Bangladesh and, as a result of their activities (*Making Waves*, regular corruption surveys and the publishing of the CPI), the GoB has found TBI increasingly challenging. Overall, CSO activity in the area of governance has led to increased awareness about governance concerns and, in the absence of meaningful space for political opposition, such organisations and the media have facilitated public scrutiny.

There are clearly a number of problems relevant to the role NGOs can play in the fight against corruption. Firstly, many NGOs are increasingly financially dependent on government and that causes tensions in how far they can fully exercise their watchdog role. Secondly, NGOs that are vocal and critical of government activity are increasingly being harassed by government. With the splitting of the once strong NGO apex body (the Association of Development Agencies of Bangladesh) into two organisations (a smaller Association of Development Agencies of Bangladesh and the Federation of NGOS in Bangladesh) their collective voice has weakened. Third, NGOs struggle with their own governance problems, as was explained in Section 1.[34]

Media and public access to information

Bangladesh is said to have a quite free, outspoken and independent media landscape and the media's capacity to deal with pertinent issues of relatively high quality has risen, especially since the return to democracy in the 1990s. The media has the potential to play an important role in curtailing corruption by increasing the risk of exposure. But this very much depends on a number of enabling factors, such as that the media is independent and free from over-regulation or undue pressure from state and commercial interest, able to produce sufficiently high quality news and information and is capable of reaching large sections of the population.[35] The situation in Bangladesh looks as follows:

- **A free media?** While there is a constitutional guarantee of freedom of the press, there are a number of restrictions in place, though until now not regularly exercised, that can be used to stifle the media. For example, a significant curb on the media in recent years is the ability of the government to revoke licenses. Until recently, the Official Secrets Act regulated Bangladeshis' right to information and public servants faced strong official sanctions if they disclosed information. Notably, during the first parliamentary session of the new government, the Right to Information Act 2009 has been approved by Parliament in line with Bangladesh's commitment to UNCAC. It remains to be seen, though, what this will mean in practice.
- **Independence of the media?** The independence of the media is compromised to some extent by the fact that it is itself politicised. Members of the political

34 World Bank. 2006. *Bangladesh Community-Based Local Governance Support Project*. Project Information Document. Washington DC: the World Bank.
35 World Bank. 2002. *"Media"-World Development Report: Building Institutions for Markets*. Washington DC: the World Bank.

and business elite own print and broadcast media in Bangladesh. Self-regulation of the media is often weak.

- **Capacity of the media (quality and coverage)?** It is said that the quality of media outlets has improved significantly over the past decade, though print media seems more prone to partisan influences, and electronic media tend to cover news more superficially. The most important Bangla print media are Prothom Alo tops, Jugantor, Ittefaq, Amar Desh and Naya Diganta. English language papers have also emerged with the Daily Star and the Bangladesh Observer undoubtedly being the biggest. Some figures suggest that there are about 65,000 readers of English language papers.[36] There are now many private television stations including ten satellite TV channels, of which two are foreign owned.[37]

Elections

When it comes to the integrity of the election process and extent to which citizens can participate in the election process, Bangladesh scores relatively well. Citizen engagement and voter participation were expected to be high in the 2008 parliamentary elections, yet the limited effectiveness of the Election Commission detracted from the legitimacy of the national election process. The regulatory framework governing the financing of political parties is rated *very weak* due to no limitations on donations to political parties, no requirements to disclose and audit party expenditures and no public access to this information. Table A7.2.4 presents the results of the *Global Integrity Index 2008* and more detailed information is found in the subsequent sections.

Table A7.2.4: Elections GII, Bangladesh scorecard 2008

Indicator	Dimension	Score	
II-1	Voting and citizen participation	83	*strong*
II-2	Election integrity	86	*strong*
II-3	Political financing	20	*very weak*

Source: Global Integrity Index 2008, Global Integrity Scorecard: Bangladesh.

Scale: (< 60) *very weak*, (60+) *weak*, (70+) *moderate*, (80+) *strong*, (90+) *very strong*

Voting and citizen participation, integrity of the election process

Bangladesh's Constitution regulates the right to vote and for elections to take place at regular intervals (The Constitution, Articles 11, 27, 122 and 123). Bangladesh elections are considered relatively free and fair, as were the parliamentary elections in December 2008 that enjoyed high voter participation. In the run up to last year's elections, the Election Commission took steps to enhance poll credibility by introducing voter ID cards and cleaned up the voters roll, now standing at 80 million voters.[38]

36 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC.
37 Figures from Ministry of Information, 2006.
38 International Crisis Group, Bangladesh. 11 December 2008. *Elections and Beyond*. Asia Briefing N°84.

Various studies however, point to concerns as regards the integrity of the election campaign process and the capacity of the Election Commission. A study undertaken by TIB in 2008[39] highlighted that a significant number of candidates started their campaign prior to the declaration of the election schedule and candidates tended to spend much more than the legal maximum of Tk 5 lakh per candidate. For example, up to the last date of withdrawal of nomination (3 January 2007), the 122 candidates spent a total amount of Tk 18 crore 55 lakh 45 thousand 350. Accordingly each candidate spent more than Tk 15 lakh 20 thousand on average.

The Bangladesh Election Commission is constitutionally responsible for the conduct of elections in a free and fair manner. The Constitution of Bangladesh (Article 118) provides for setting up an Election Commission for the superintendence, direction and control of the preparation of electoral rolls for election to the office of the president and to the parliament, and for the conduct of such elections in accordance with the Constitution. According to the Constitution, the Election Commission is independent in the exercise of its functions and subject only to the Constitution and applicable laws. The Election Commission has so far conducted a number of elections including eight parliamentary elections, three presidential elections – with direct voting from the common people, three referendums and several other local body elections. Among these, 13 were held under military (five local, three referendums, two presidential and three parliamentary) government, and the remainder under civilian government. Three parliamentary elections were held under non-party caretaker governments in 1991, 1996 and 2001.

However, the capacity of the Election Commission in ensuring transparent and independent elections is weak, with many studies highlighting the following problems:[40]

- There is no legal framework to guarantee full independence. The Election Commission still lacks legal provisions in respect of an enabling law for its establishment and structures similar to those of other constitutional bodies, an independent Secretariat, hiring and firing authority, financial independence, monitoring authority over political parties and a proper mechanism for dealing with election disputes. The Election Commission is officially under the Office of the President. Recruitment responsibility lies with the Ministry of Establishment and selection with the PSC with no clear rules in place for the appointment of the Election Commissioner. The expenditure of the Election Commission is charged to the consolidated fund, but for budgetary allocations, it is financially dependent on the Ministry of Finance which has occasionally delayed funding.
- There are several allegations of governance irregularities with problems involving the updating of the voter list, irregular demarcation of constituencies in line with the latest population survey of 2001, and resolving very few election petitions.
- Lack of trust in the Election Commission and the ruling party government created the scope for non-party caretaker governments in 1991, 1996, 2001 and 2008 for conducting the parliamentary general election.

39 TIB. February 2007. *Tracking the Election Process: An Analysis of the Violations of Electoral Code of Conduct by the Candidates of the Postponed Ninth Parliamentary Election*.
40 TIB. November 2006. *Bangladesh Election Commission: A Diagnostic Study*.

The Election Commission has very weak capacity to enforce the registration of political parties and candidates and transparency and accountability as regards party financing.

Political Financing

The Bangladeshi Constitution makes no reference to political parties, other than mentioning parties in the context of parliamentary functions. However, in the section on fundamental rights, the Constitution guarantees the freedom to form associations, freedom of assembly and freedom of expression. Election regulations[41] require candidates and parties to file reports on their expenditure during the campaign period. Candidates cannot spend more than Tk 500,000 during the 90-day campaign period. The election law prohibits the use of government resources and assets for political campaigns, but this requirement is ignored in practice. There is no state funding, and no restrictions on donations to either parties or individual candidates.

A study by the National Democratic Institute of International Affairs in 2005 showed that:

> *Systemic corruption, weak legislative frameworks, and unrealistic spending limits all contribute to poor accountability in Bangladesh's party finances. The lack of internal party checks and balances also stymies financial transparency: party leaderships are not held responsible for finances by the memberships. The system skews politics toward the rich, since only the wealthy can afford to run for office; they are not necessarily the most qualified, or the least corruptible.*[42]

Corruption in the election process in Bangladesh relates primarily to vote buying. Many of the issues raised in the previous quote are rooted in the fact that candidates in Bangladesh tend to violate the maximum legal spending limits and financial reports usually reveal only a fraction of what is really spent. Because candidates are expected to pay for their own campaigns, they tend to heavily rely on their personal and business wealth. Article 70 of the Constitution prohibits members of parliament from voting against their party in parliament, and is seen as a major obstacle to reforming political party finance.[43]

Government accountability

A major bottleneck in the Bangladesh NIS, is the very weak accountability of all arms of government, including the executive, legislative and judiciary. This is confirmed by the low scores on the Global Integrity Index 2008 (see Table A7.2.5).

41 Representation of the People Order 1972 and Conduct of Election Rules 1972.
42 National Democratic Institute for International Affairs. 2005. *Money in Politics: A study of Party Financing Practices in 22 countries*; TIB. 2007. *Tracking the Election Process: An Analysis of the Violations of Electoral Code of Conduct bry the Candidates of the Postponed Ninth Parliamentary Election*.; TIB. November 2006. *Bangladesh Election Commission: A Diagnostic Study*.
43 National Democratic Institute for International Affairs. 2006 *Money in Politics: A study of Party Financing Practices in 22 countries*.

Table A7.2.5: Government accountability GII, Bangladesh scorecard 2008

Indicator	Dimension	Score	
III-1	Executive accountability	45	*very weak*
III-2	Legislative accountability	56	*very weak*
III-3	Judicial accountability	51	*very weak*
III-4	Budget process	63	*weak*

Source: Global Integrity Index 2008, Global Integrity Scorecard: Bangladesh.

Scale: (< 60) *very weak*, (60+) *weak*, (70+) *moderate*, (80+) *strong*, (90+) *very strong*

Executive accountability

Generally, there is very high politicisation of the bureaucracy and government functions are regularly influenced by party politics. There is no regulation that allows for prosecution of the Head of State for crimes, although ministerial-level officials can be prosecuted. There is no regulation dealing with asset disclosure and citizens cannot access asset disclosure records of the government officials. Legally, the High Court has the right to review the actions of the executive (judicial review) and citizens can take legal action against any law or action violating the Constitution. However, in practice this hardly ever takes place.[44] Holding the executive accountable also very much relates to mechanisms of accountability built into the budget process (e.g. internal controls, internal and external audit and parliamentary scrutiny). This is highlighted in the following sections.

Judiciary and police reform

The justice sector has been at a low point in terms of authority, independence, corruption and capacity. "*The justice sector stands out as one sector where the signs of deterioration outweigh any improvements*." (IGS, *State of Governance Report 2006*).

Although the Constitution explicitly provides for an impartial and independent judiciary[45] separation of the judiciary from the executive has only recently begun. The justice system has suffered from political and executive interference, corruption, low capacity and quality, and lack of oversight.

The PRSP[46] points to *"weaknesses in procedural law, prevalence of vested groups, poor training and physical facilities, lack of inspection and supervision [and] intrusion of political considerations"* as contributing factors to the decline of the justice system.

The government's Strategy for Legal and Judicial Reforms (2000) focused on improved civil justice and was designed as a roadmap for 10-15 years of capacity building and reform. It was designed with assistance from the World Bank and was followed by assistance from the World Bank and other partners in the form of the

44 Global Integrity Index, Global Integrity Scorecard Bangladesh, 2008.
45 *The Constitution of the People's Republic of Bangladesh*. 1972. This provides for the separation of the judiciary from the executive. Chapter 1 establishes a judicial system in which the subordinate courts are accountable to the Supreme Court and not to the executive.
46 Government of the People's Republic of Bangladesh. April 2007.*Unlocking the Potential: National Strategy for Accelerated Poverty Reduction*.

Legal and Judicial Capacity Building Project, The Strategy appears to have been abandoned, however.

Corruption is reported to be widespread at all levels. A household survey by TIB found that over 60% of the people who used the lower courts in 2004, paid a bribe, averaging at 25% of the average annual income.[47] Funding of the courts for both resources and salaries is low compared to middle and high income countries in Asia, a factor which, according to TI, 'invites' corruption.[48]

The level of corruption is unclear. There have been no prosecutions of justice sector officers by the ACC as its preliminary focus has been on political figures and very few judges have been dismissed for corruption.[49]

Political and executive interference have created a crisis in the justice system. The judiciary gained independence from the executive only towards the end of the period under review despite a decision on appeal by the Supreme Court in 1999[50] directing that the separation mandated by the Constitution should take effect. Accordingly, executive control over the justice sector and the dual role of magistrates during the period created a risk of interference by the executive and the government in decisions and functioning of the justice sector.[51]

There is no independent prosecution service. The current government has not ratified an ordinance passed by the Caretaker Government creating one. Currently, the police and the public attorney service, that is highly politicised, carry out prosecution.

Partial separation of the Judiciary from the executive has been achieved. Article 22 of the Constitution provides that *"The State shall ensure the separation of the judiciary from executive organs of the State"*. The legal and administrative framework to achieve this was only put in place in 2007. Successive governments in waiting pledged in their manifestos to effect the separation but once in government, did nothing. The catalyst of the recent move towards independence from the executive was a case brought by over 400 judicial officers in 1995 requesting a ruling on the question of separation of the judiciary from the executive.[52] The High Court heard the case in 1997 and gave what is now a historic judgment comprising 12 directives relating to separation of the judiciary. In 1999, the appellate division of the Supreme Court heard the GoB's appeal against the High Court decision and directed the government to implement the 12 directives. The pace of change was 'glacial',[53] however, until the Caretaker Government in 2007 amended rules made under the Constitution relating to the appointment, posting, discipline and removal of the judiciary; properly constituted the Judicial Service Commission;[54] set up a

47 Transparency International. 2007. *Global Corruption Report*.
48 Ibid.
49 Stapleton, A, Moran, G and Hossain, S. 2007. *Joint Assessment of Prospects for Harmonisation within the Justice Sector in Bangladesh*. Commissioned by the Justice and Human Rights Working Group of the Local Consultative Group of the Development Partners in Bangladesh. Funded by CIDA, DFID-World Bank Trust Fund, Danida and GTZ.
50 The Masder Hossain Case Civil Appeal no. 79/1999.
51 Magistrates – until the very recent changes in the law – performed both executive and judicial functions. Executive functions would include for example, issuance of an arrest warrant, or an order for proscribing public gatherings. Judicial powers include for example those to grant bail, police remand, or to take evidence.
52 Known as the Masder Hossain case.
53 Stapleton, A, et al., op. cit.
54 The Judicial Service Commission had been created in 2004 but not constituted in accordance with the Masder Hossain judgement.

Judicial Service Pay Commission; and amended the Code of Criminal Procedure to give effect to the separation in the subordinate courts.

But continued commitment needs to be shown. The judiciary is not fully separated from the executive. Although the Caretaker Government ordinance all but abolished executive magistrates, restricting their jurisdiction to administrative public order duties, all ordinances made by a Caretaker Government require ratification by an elected government. The current government amended rather than ratified this ordinance, giving back some judicial powers to executive magistrates. There are claims that these powers are open to abuse by the executive and are often poorly executed resulting in miscarriages of justice and frequent appeals to the District Judge for reversal or setting aside of the decisions of executive magistrates. The matter was in the High Court after a writ was brought by NGOs.[55]

Quality and efficiency is low. Judicial quality, particularly in the subordinate courts, has declined over the period partly due to poor salaries and benefits that are unable to compete with the private sector for the most able candidates.[56] Judicial training has also been inadequate although attempts have been made to address this through improved access to training courses at the Judicial Administrative Training Institute.

The courts have been wrestling with a large backlog of cases caused by inefficiencies in the justice system, a shortage of courts and poor quality judicial staff.[57] In 2005, the case backlog in district and magistrates' courts was estimated at around 500,000 in both civil and criminal matters.[58] The Supreme Court reports a rising trend.[59] Efforts to address this have focused on increasing the efficiency of court administration, improving judicial education and diverting cases from the formal justice system through encouraging the use of alternative dispute resolution.[60]

Oversight and accountability are improving. The Supreme Court has oversight over the performance of the judiciary of the subordinate courts. It has the power to investigate allegations against judges, to require regular inspection of the subordinate court and to enforce the judicial code of conduct. Exercise of these powers has suffered from executive interference, however, and[61] oversight has not been rigorous. The Bar Association and the media have played an important watchdog role.

The use of oversight mechanisms has recently shown some improvement with the introduction of a requirement for submission of wealth declarations by the subordinate judiciary, public reporting on the results of inspections of the subordinate courts and an indication of an increased willingness for the Supreme Judicial Council to deal with allegations of misconduct or corruption against judges.

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55 On an application by Human Rights and Peace for Bangladesh. Judicial Power of Executive Magistrates Questioned. Retrieved 3 May 2011 from www.bdnews24.com/details.php?cid=2&id=147032
56 Institute of Governance Studies. 2008. *The State of Governance in Bangladesh 2007: Expectations, Challenges, Commitments*. Dhaka: BRAC.
57 Danida. 2005. *Human Rights and Good Governance Programme Document*.
58 Stapleton, A, et al., op. cit.
59 Supreme Court of Bangladesh Annual Reports 2007 and 2008.
60 Legal and Judicial Capacity Building Project 2001-08, World Bank, Danida, and CIDA.
61 Stapleton, A, et al., op. cit.

These reforms are not fully implemented, however. Although compliance with the requirement for wealth declarations has been high amongst the subordinate judiciary, a database and monitoring systems are not yet in place. Declarations are not required of the higher judiciary despite the Chief Justice having the power since 2001 to require them. There is a suspicion that there is insufficient political will to extend the reforms from the subordinate judiciary to the higher judiciary. A full *Annual Report on the State of the Judiciary* was published in 2007 (for the first time). The following year, the Annual Report covered only the Supreme Court and did not contain inspection information on the subordinate courts.

Public confidence in the justice system has diminished. In 2004, the Supreme Court was viewed as still having a reputation to defend but public perception studies indicated that citizens believe that the subordinate courts (particularly magistrates' courts) are prone to corruption.[62] TIB conducted sample perception surveys that showed that the judiciary was perceived as the second (after the police) most corrupt public institution. Politicisation of the lower judiciary led to a 'crisis of confidence'.[63]

Confidence in even the Supreme Court had declined by 2008:

> *While there remain a number of judges on the High Court and Appellate Divisions of the Supreme Court of competence and integrity, trust in the superior courts and in the quality of the justice they dispense has fallen considerably, a trend which showed few signs of reversal during the Caretaker Government's tenure.*[64]

As a consequence, members of the public and the private sector have avoided using the formal justice system where they can, using informal dispute resolution mechanisms and arbitration where available.

Legislative accountability

Officially, the judiciary can review laws passed by the legislature. Members of parliament are subject to criminal proceedings and are required to file an asset disclosure form. There is, however, no requirement for an independent audit of asset disclosure forms and citizen have difficulties freely accessing this information. The records are not preserved by the EC and are usually destroyed after a year. Members of parliament often have ties with the private sector and there are no restrictions on that.[65] In 2001, 60% of members of parliament were businessmen compared to only 27% in 1970.[66]

Judicial accountability

The Constitution provides for the transparent appointment of judges and, by law, the judiciary and the Supreme Court of Bangladesh are protected from political interference. In practice, however, this is not guaranteed. Under the auspices of the

62 ADB. *Country Governance Assessment 2004.*
63 Stapleton, A, et al., op. cit.
64 Institute of Governance Studies. 2008. *The State of Governance in Bangladesh 2007: Expectations, Commitments, Challenges*. Dhaka: BRAC.
65 Global Integrity Index, Global Integrity Scorecard Bangladesh, 2008.
66 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC.

Caretaker Government, a Supreme Judicial Commission was recently formed to make the appointment of judges more transparent and less prone to politicisation. The Supreme Court of Bangladesh can legally hold the members of the judiciary accountable for their actions, but there are no regulations on asset disclosure.[67]

Budget process

Good PFM can help to promote wider governance principles like transparency, accountability, legitimacy and integrity. Thus, PFM reform is part and parcel of a wider governance agenda and the fight against corruption.

Bangladesh has benefited from over a decade of support to PFM reform. In an effort to record the achievements and challenges of this process, DFID, in cooperation with the Ministry of Finance, undertook an impact assessment of PFM reform in 2007.[68] Part of this analysis was carried out by applying the PEFA methodology. The PEFA scores highlight an important conclusion. Whereas clear improvements in technical capacity have been achieved in some areas (e.g. multi-annual and financial reporting), major bottlenecks persist in transparency and accountability. Progress in tax reform, internal and external audit as well as parliamentary scrutiny has been very limited, with hardly any improvements in the PEFA scores between 1992 and 2006. Also the budget process is political in nature, and further progress in capacity building is constrained by a number of political economy and institutional factors. Weak domestic accountability has led to a lack of challenge through the PFM reform process to vested interests. Major stumbling blocks are that the constituency for change has been limited to the Ministry of Finance, the fact that the audit and accounts cadres are not separated, and the practice of the Ministry of Establishment to rotate staff very frequently across the entire administration, often based on party lines.

The Comptroller & Auditor General (C&AG) and the various parliamentary committees, in particular the Public Accounts Committee (PAC), play an important role in ensuring the scrutiny and integrity of the budget process. The C&AG will be dealt with. There are wide ranges of issues that undermine the parliamentary committee's capacity to hold the executive accountable. Broadly speaking, sectoral standing committees were, until 1997, headed by the Minister. This led to a conflict of interest. According to a recent TIB study, standing committees do not meet regularly and there is an unsatisfactory level of attendance by its members. There is a significant backlog in reviewing the annual C&AG reports and the PAC lacks the technical and financial capacity to scrutinise and to monitor follow up to PAC requests and recommendations by the executive. There is little evidence of response by the executive despite higher quality reports. Many charges have been brought, says the PAC, but none has resulted in a conviction. In the absence of a clear procedure by which ministries, departments and agencies have to respond to PAC reports, this situation is unlikely to change.

67 Global Integrity Index, Global Integrity Scorecard Bangladesh, 2008.
68 Government of Bangladesh and DFID. 2007. *Assessment of the Impact of Financial Management Reforms in Bangladesh 1992 to 2006*. Dhaka.

Administration and civil service

According to the Global Integrity Index, Bangladesh ranks *strong to very strong* in the area of privatisation, procurement and whistleblowing measures, and *very weak* as regards civil service regulations (see Table A7.2.6).

Table A7.2.6: Administration and civil service GII, Bangladesh scorecard 2008

Indicator	Dimension	Score	
IV-1	Civil service regulations	53	*very weak*
IV-2	Whistleblowing measures	81	*strong*
IV-3	Procurement	86	*strong*
IV-4	Privatisation	96	*very strong*

Source: Global Integrity Index 2008, Global Integrity Scorecard: Bangladesh.

Scale: (< 60) *very weak*, (60+) *weak*, (70+) *moderate*, (80+) *strong*, (90+) *very strong*

Civil service regulations

Chapter 1 highlighted the fact that the process of recruitment, promotion and retirement in the civil service is highly politicised in Bangladesh and prone to corruption. A major actor in ensuring integrity is the PSC. According to the Constitution Articles 137-141, the PSC is assigned the role of selecting the most competent persons for the public service through competitive examinations and tests in a fair and transparent manner and of providing advice on recruitment rules, promotions, transfers and other public service matters. However, in practice, the PSC has been highly criticised for a lack of independency and capacity and a high degree of politicisation, undermining its credibility as a watchdog.

As a 2007 TIB study[69] highlights, although legally, the PSC is independent, the secretariat is under the control of the executive and the Ministry of Establishment influences internal procedures for recruitment, disciplinary and administrative issues. The criteria for appointment of the chairman are not clearly defined, and appointments of the chairman and other members of the PSC have been criticised on partisan grounds. There are no accountability mechanisms between chairmen and members and limited meaningful reporting on the activities of the PSC. In addition, the PSC is faced with serious capacity issues, including a lack of qualified staff and incentives for merit-based promotion. TIB emphasises that the examination system is archaic and outdated, lacking the scope for proper assessment of the competency of candidates. Because of a lack of transparent assessment criteria for examinations, there is scope for irregularities and corruption in the recruitment process. There have been blatant examples of partisan recruitment in important cadres like the administration and the police.

Whistleblowing measures, procurement and privatisation

There is no legislation that protects whistleblowers. Public sector whistleblowers are sometimes able to come forward, but there is no robust mechanism to protect

69 TIB. 2007. *Bangladesh Public Service Commission: A Diagnostic Study*.

them and hence whistleblowers are often punished either through official or unofficial means.

Bangladesh's new procurement policy framework is laid down in the Public Procurement Act 2007 and is regarded as state of the art within the Asia region. But implementation of new procurement regulations remains a major challenge as identified by the CPAR 2002, which stated: *"inefficiencies in procurement in Bangladesh are the single most significant issue affecting public sector performance with enormous wastage of money"*. DFID internal documentation from 2007 also states that the level of compliance by line ministry staff varies, with less progress in improving tangible outcomes on the ground. Contractors do not comply with some of the procedural requirements and these do not seem to be enforced.[70]

Privatisation has gained gradual momentum since the 1970s and the government developed a liberal Industrial Policy in 1991, when 42 enterprises were identified for privatisation. Later on, the number of enterprises was increased to 62 adding 20 textile mills under the ADB-sponsored Industrial Sector Programme. The main body responsible for guiding the privatisation process is the Privatisation Board established in 1993, and which later in 2000 became a commission, delegating more administrative and financial authority to intensify the privatisation programme drive.[71] By 2007, 74 state-owned enterprises were privatised relating to textiles, jute, manufacturing, chemicals, food, leather and the banking sector. Overall, limited information was available during inception on the role of the Privatisation Commission within the NIS.

Oversight and regulation

Oversight and regulation in Bangladesh show a varied picture based on the Global Integrity Index (see Table A7.2.7), with particular concerns about the National Ombudsman.

Table A7.2.7: Oversight and regulation GII, Bangladesh scorecard 2008

Indicator	Dimension	Score	
V-1	National Ombudsman	61	*weak*
V-2	Supreme Audit Institution	78	*moderate*
V-3	Taxes and customs	83	*strong*
V-4	State-owned enterprises	75	*moderate*
V-5	Business licensing and regulation	79	*moderate*

Source: Global Integrity Index 2008, Global Integrity Scorecard: Bangladesh.

Scale: (< 60) *very weak*, (60+) *weak*, (70+) *moderate*, (80+) *strong*, (90+) *very strong*

The following sections will pay primary attention to the role of the National Ombudsman and the C&AG in Bangladesh.

70 World Bank. *Country Assistance Strategy 2006-2009*.
71 Privatisation Commission. July 2007. *Privatization in Bangladesh: Opportunities and Potentials*.

National Ombudsman

Article 77 of the Constitution and the Ombudsman Act 1980 provide for the establishment of the office of an ombudsman. In reality, Bangladesh has only a Tax Ombudsman established in 2006, as regulated in the Tax Ombudsman Act 2005. This office is dependent on the government, both operationally and financially. In 2007, 47 complaints were considered for investigation and 72 complaints were not considered for investigation due to insufficient merit. Among the considered 47 complaints, 36 were investigated and disposed of with recommendations to the National Board of Revenue. The National Board of Revenue and its subordinate offices have implemented 11 of these recommendations. The remaining 25 are under the process of implementation. To date, the Tax Ombudsman office does not make any public report. It is unclear what the GoB's plans are with regard to strengthening the national ombudsman.[72]

The Comptroller & Auditor General

Whereas the C&AG is constitutionally independent, the C&AG's office is severely constrained by the operation of the Rules of Business of the Government under which the C&AG is subject to the direction and control of the Finance Ministry. The recruitment for the filling of posts at the C&AG's office is subject to the direction and control of both the Finance Secretary and the Establishment Secretary. Officers attached to the office of the C&AG can be removed under the Government Servants' Conduct Rules. Broadly speaking, C&AG capacity constraints remain severe. While undertaking primarily financial and compliance audits, some progress has been achieved towards more systems-based/entity wide auditing in the first four medium-term budget framework line ministries and clearing audit backlog, but the independence of the C&AG remains a major bottleneck. The C&AG has a code of ethics and complies with the International Organization of Supreme Audit Institutions (INTOSAI) standards. There is a severe lack of qualified staff. The Foreign Aid Projects Audit Directorate was established in 1982 upon the request of donors and tends to have received relatively more capacity building by donors compared to the other audit directorates due to donors' specific audit requirements.

AC and rule of law

The GII rated the quality of Bangladesh AC Law as *very strong* in 2008 and the AC Agency, rule of law and law enforcement as *moderate* (see Table A7.2.8).

Table A7.2.8: AC and rule of law GII, Bangladesh scorecard 2008

Indicator	Dimension	Score	
VI-1	AC Law	100	*very strong*
VI-2	AC Agency	77	*moderate*
VI-3	Rule of law	79	*moderate*
VI-4	Law enforcement	71	*moderate*

Source: Global Integrity Index 2008, Global Integrity Scorecard: Bangladesh.

Scale: (< 60) *very weak*, (60+) *weak*, (70+) *moderate*, (80+) *strong*, (90+) *very strong*

72 Global Integrity Index, Global Integrity Scorecard Bangladesh, 2008.

AC law and AC agency

The AC Bureau, as it was previously called, was established in 1947 under British rule and was a highly ineffective organisation with a poor track record of prosecution of corruption cases. In November 2004, the ACC was established largely at the behest of the donor community. The ADB provided technical assistance to operationalise the ACC but, by the end of 2006, not much had changed and the ACC had accumulated a backlog of several thousand complaints.

Since 2004, Bangladesh has had an AC Act that defines corruption, receiving and offering a bribe, extortion, conspiracy to commit a crime, money laundering and using official state information for private gain as illegal.

Between the beginning of 2007 and the end of 2008, amid demands from the public and civil society, the ACC became the focal point of the Caretaker Government's fight against corruption. As a result, a number of high-ranking political and public administration officials and businessmen were charged with corruption. The Caretaker Government published the ACC Rules of 2007 to strengthen the ACC. The ACC was fully revamped in terms of staffing[73] and given new investigative powers to speed up processes.[74] The ACC is now theoretically able to recruit its own staff, become independent from the executive and the position of commissioner was upgraded to Cabinet level.

Major challenges remain for the ACC. Although Article 3(2) of the ACC Act 2004 states that *"the Commission shall be independent and impartial"*, in practice the ACC is not. The ACC is under the Prime Minister's office, recruitment responsibility lies with the Ministry of Establishment and selection with PSC. Financially, the ACC is dependent on the Ministry of Finance. Although the ACC is protected from political interference by law, past political governments have heavily influenced it, where key ACC staff have been political appointees. Moreover, the ACC does not have a sufficient number of full-time qualified staff to exercise its duties and undertake its operations effectively.[75]

Rule of law

Rule of law and law enforcement are key AC mechanisms on the supply side. Key elements of rule of law include: (1) a government bound by law and subject to restraints of power, (2) equality before the law, (3) maintenance of public order and enforcement of norms embodied in law, (4) predictable, effective and efficient rulings, (5) protection of human rights and dignity of the individual.

Bangladesh has a fully structured formal justice system that is supplemented by informal systems. According to the WBI, the quality of the rule of law improved somewhat in Bangladesh from -0.92 in 2004 to -0.65 in 2008.[76] Yet problems of efficiency, accountability, and the politicisation and corruption in the justice sector

73 The Chairman was a former Chief of Staff of the Army and former advisor to the first caretaker government and the other two Commissioners comprised a former judge and former Commissioner in the customs department.
74 A corruption offence is non-bailable, and the ACC could freeze property and order a 30 days detention without sanctions from the courts. Other investigative powers were added e.g. reviewing one's wealth and lifestyle statement.
75 TIB. 2001. *Fact Finding Mission.* AC Bureau; IGS. 2007. *Institutions of Accountability: ACC.*
76 On a scale of -2.5 (*weak rule of law*) and +2.5 (*good rule of law*).

regularly surface. Impeding access to justice for the poor and making it difficult to hold corrupt practices to account. The judiciary suffers from a lack of operational independence as the appointment, posting, and promotion to the higher courts remains under the control of the executive. Whereas the Ministry of Law, Justice and Parliamentary Affairs appoints lower judiciary staff and assistants to district judges, the Ministry of Establishment directly appoints magistrates. The recruitment of judges is highly politicised, both in lower and higher courts. Formal accountability mechanisms in the judicial system itself are weak or non-existent. The administration of justice is under-funded, painfully slow and characterised by excessive delays. There are concerns about the quality, the level of qualifications and the training of staff.[77] Upon the initiative of the Caretaker Government, the lower courts have become independent from the executive. The Ministry of Establishment now no longer appoints court officials. A Supreme Judicial council has been established to investigate corrupt judges.

Law enforcement

The main law enforcement agency is the police under the Ministry of Home Affairs with 539 police regions or 'thanas' across the country. The Police Act of 1861 governs policy administration with operational aspects guided by the Policy Regulation of Bengal 1943. Other enforcement agencies include the Chaukidars and Dafadars (village police), Ansars and Village Defence Party, Bangladesh Rifles (paramilitary force charged with border protection and prevention of smuggling) and the Rapid Action Battalion (charged with crime control, confiscation of illegal arms, trafficking, money laundering, etc.). Both TIB surveys and a BBC Survey in 2005 confirmed that Bangladeshis have very little trust in the police. The major problems for the police include the role that politics plays in the transfer and posting of police officers. Working conditions are quite poor, and training and career opportunities reserved for senior level officers police do not attract sufficiently skilled and motivated staff. There is no support system for police and their families, housing and medical facilities for lower ranks are poor and welfare benefits in the case of accidents or death are not distributed in a timely manner. Other concerns relate to operational issues, e.g. the excessive workload and lack of operating budget for police stations.[78]

77 Ferdous J., *From Rule of Law to Legal Empowerment of the Poor in Bangladesh: Towards an Agenda for Change*.
78 Centre for Governance Studies. 2006. *The State of Governance in Bangladesh 2006: Knowledge, Perceptions, Reality*. Dhaka: Centre for Governance Studies, BRAC.

EVALUATION REPORTS

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1.02 Evaluation of the Norwegian Resource Bank for Democracyand Human Rights (NORDEM)
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3.02 Evaluation of ACOPAMAn ILO program for "Cooperative and Organizational Support to Grassroots Initiatives" in Western Africa 1978 – 1999
3A.02 Évaluation du programme ACOPAMUn programme du BIT sur l'« Appui associatif et coopératif auxInitiatives de Développement à la Base » en Afrique del'Ouest de 1978 à 1999
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15.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Guyana
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17.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Tanzania
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Joint Evaluations

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Steering Committee of the Joint Evaluation of Emergency Assistance to Rwanda,1996.

1997:1 **Searching for Impact and Methods: NGO Evaluation Synthesis Study.**

Stein-Erik Kruse, Timo Kyllönen, Satu Ojanperä, Roger C. Riddell, Jean-Louis Vielajus

Min of Foreign Affairs Finland, OECD-DAC, Sida, 1997.

1997:2 **Measuring and Managing Results: Lessons for Development Cooperation: Performance Management**

Derek Poate

UNDP/OESP Sida, 1997.

2003:1 **Local Solutions to Global Challenges: Towards Effective Partnership in Basic Education. Final Report. Joint Evaluation of External Support to Basic Education in Developing Countries.**

Ted Freeman, Sheila Dohoo Faure

Netherlands Ministry of Foreign Affairs, CIDA, DFID, Department for Foreign Affairs Ireland, EU, BMZ, JICA, Ministry of Basic Education and Literacy Burkina Faso, Danida, Norad, Sida, UNESCO, UNICEF, World Bank. 2003.

2003:2 **Toward Country-led Development : a Multi-Partner Evaluation of the Comprehensive Development Framework : Synthesis report**

Carol Lancaster, Alison Scott, Laura Kullenberg, Paul Collier, Charles Soludo, Mirafe Marcos, John Eriksson, Alison Scott; Ibrahim Elbadawi; John Randa,

World Bank, OED, CIDA, Danida, Norad, ODI, JICA, Sida, 2003.

2005:1 **Support to Internally Displaced Persons: Learning from Evaluation. Synthesis Report of a Joint Evaluation Programme.**

John Borton, Margie Buchanan Smith, Ralf Otto

Sida, 2005.

2005:2 **Support to Internally Displaced Persons: Learning from Evaluation. Synthesis Report of a Joint Evaluation Programme: Summary Version**

John Borton, Margie Buchanan Smith, Ralf Otto

Sida, 2005.

2005:3 **Humanitarian and Reconstruction Assistance to Afghanistan 2001- 2005: From Denmark, Ireland, the Netherlands, Sweden and the United Kingdom; A Joint Evaluation. Main report**

Danida, Sida, Chr. Michelsen Institute, Copenhagen, DFID, Development Cooperation Ireland, BMZ, 2005.

2005:4 **Humanitarian and Reconstruction Assistance to Afghanistan 2001–2005: From Denmark, Ireland, the Netherlands, Sweden and the United Kingdom; A Joint Evaluation. Summary**

Danida, Sida, Chr. Michelsen Institute, Copenhagen, DFID, Development Cooperation Ireland, BMZ, 2005.

2005:5 **An Independent External Evaluation of the International Fund or Agricultural Development**

Derek Poate, team leader, Charles Parker, Margaret Slettevold …

IFAD, Sida, CIDA, 2005.

2006:1 **Joint Evaluation of the International response to the Indian Ocean tsunami: Synthesis Report**

John Telford, John Cosgrave, contribution Rachel Houghton

Tsunami Evaluation Coalition (TEC) Action aid, AusAID, BMZ CIDA, Cordaid, Danida, Dara, Irish Aid, DFID, FAO, IFRD, Federal Min for Economic Cooperation and Development Germany, JICA, Min des Affaires Étrangères France, Min des Affaires Étrangères Luxembourg, Norad, NZAID, DEZA, Sida, UN, UNDP, UNFPA, Unicef, Usaid, WFP, WHO, World Vision, 2006.

2006:2 Impact of the tsunami response on local and national capacities

Elisabeth Scheper, Arjuna Parakrama, Smruti Patel, contribution Tony Vaux

Tsunami Evaluation Coalition (TEC) Actionaid, AusAID, BMZ, CIDA, Cordaid, Danida, Dara, Irish Aid, DFID, FAO, IFRD, Federal Min for Economic Cooperation and Development Germany, JICA, Min des Affaires Étrangères France, Min des Affaires Étrangères Luxembourg, Norad, NZAID, DEZA, Sida, UN, UNDP, UNFPA, Unicef, Usaid, WFP, WHO, World Vision, 2006.

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Jon Bennett, William Bertrand, Clare Harkin, Stanley Samarasinghe, Hemantha Wickramatillake

Tsunami Evaluation Coalition (TEC) Actionaid, AusAID, BMZ, CIDA, Cordaid, Danida, Dara, Irish Aid, DFID, FAO, IFRD, Federal Min for Economic Cooperation and Development Germany, JICA, Min des Affaires Étrangères France, Min des Affaires Étrangères Luxembourg, Norad, NZAID, DEZA, Sida, UN, UNDP, UNFPA, Unicef, Usaid, WFP, WHO, World Vision, 2006.

2006:4 Funding the Tsunami Response: A synthesis of findings

Michael Flint, Hugh Goyder

Tsunami Evaluation Coalition (TEC) Actionaid, AusAID, BMZm CIDA, Cordaid, Danida, Dara, Irish Aid, DFID, FAO, IFRD, Federal Min for Economic Cooperation and Development Germany, JICA, Min des Affaires Étrangères France, Min des Affaires Étrangères Luxembourg, Norad, NZAID, DEZA, Sida, UN, UNDP, UNFPA, Unicef, Usaid, WFP, WHO, World Vision, 2006.

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Ian Christoplos

Tsunami Evaluation Coalition (TEC) Actionaid, AusAID, BMZm CIDA, Cordaid, Danida, Dara, Irish Aid, DFID, FAO, IFRD, Federal Min for Economic Cooperation and Development Germany, JICA, Min des Affaires Étrangères France, Min des Affaires Étrangères Luxembourg, Norad, NZAID, DEZA, Sida, UN, UNDP, UNFPA, Unicef, Usaid, WFP, WHO, World Vision, 2006.

2006:6 The role of needs assessment in the Tsunami response – Executive summary

Claude de Ville de Goyet, Lezlie C Morinière

Tsunami Evaluation Coalition (TEC) Actionaid, AusAID, BMZm CIDA, Cordaid, Danida, Dara, Irish Aid, DFID, FAO, IFRD, Federal Min for Economic Cooperation and Development Germany, JICA, Min des Affaires Étrangères France, Min des Affaires Étrangères

Luxembourg, Norad, NZAID, DEZA, Sida, UN, UNDP, UNFPA, Unicef, Usaid, WFP, WHO, World Vision, 2006.

2006:7 Evaluation of Coordination and Complementarity of European Assistance to Local Development: with Reference to the 3C Principles of the Maastricht Treaty

Robert N. LeBlanc and Paul Beaulieu

Sida, Ministry for Foreign Affairs, Austria, Ministry for Foreign Affairs, Department for International Development Cooperation. Belgium, Min. des Affairs étrangères/Direction General de la Cooperation International, France, Department of Foreign Affairs Development Co-operation Division, Ireland and Ministry of Foreign Affairs/Directorate-General for International Cooperation, the Netherlands, 2006.

2007:1 Evaluation of General Budget Support – Note on Approach and Methods. Joint Evaluation of General Budget Support 1994–2004

AFD, DFID, MOFA, NZAID, USAID, AusAID, BMZ, JBIC, NORAD, Danida, SECO, CIDA, JICA, Min of Foreign Affairs Spain, Portuguese Development Cooperation, Sida, 2007.

2007:2 Evaluating Co-ordination, Complementarity and Coherence in EU development policy: a synthesis

Evaluation Services of the European Union, Sida, Ministry for Foreign Affairs, Austria,

Ministry for Foreign Affairs, Department for International Development Cooperation. Belgium, Min. des Affairs étrangères/Direction General de la Cooperation International, France, Department of Foreign Affairs Development Co-operation Division, Ireland and Ministry of Foreign Affairs/Directorate-General for International Cooperation, Netherlands, 2007.

2007:3 Evaluating Democracy Support: Methods and Experiences.

Sida, Department for Evaluation and Internal Audit and International Institute for Democracy and Electoral Assistance (IDEA), 2007.

2007:4 Peer Review Evaluation Function at the World Food

Programme (WFP). Peer Panel Members: Jock Baker, Stefan Dahlgren, Susanne Frueh, Ted Kliest, Zenda Ofir.Advisors to the Panel: Ian Christoplos, Peta Sandison Sida, BMZ, UNEG, WFP, 2007.

2008:1 Managing Aid Exit and Transformation: Lessons from Botswana, Eritrea, India, Malawi and South Africa: Synthesis Report

Anneke Slob, Alf Morten Jerve

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

2008:1:1 Managing Aid Exit and Transformation: Summary of a Joint Donor Evaluation

Jesper Heldgaar

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

2008:1:2 Managing Aid Exit and Transformation: India Country Case Study

Albert de Groot, CK Ramachandran, Anneke Slob, Anja Willemsen, Alf Morten Jerve

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

2008:1:3 Managing Aid Exit and Transformation: South Africa Country Case Study

Elling N Tjønneland, Pundy Pillay, Anneke Slob, Anje Willemsen, Alf Morten Jerve

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

2008:1:4 Managing Aid Exit and Transformation: Eritrea Country Case Study

Teferi Michael, Rudy Ooijen, Anneke Slob, Alf Morten Jerve

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

2008:1:5 Managing Aid Exit and Transformation: Malawi Country Case Study

Esther van der Meer, Arne Tostensen, Anneke Slob, Alf Morten Jerve

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

2008:1:6 Managing Aid Exit and Transformation: Botswana Country Case Study

Sida, Netherland's Ministry of Foreign Affairs, Danida and Norad, 2008.

Charity Kerapeletswe, Jan Isaksen, Anneke Slob, Alf Morten Jerve

2008:2 Evaluation of the Implementation of the Paris Declaration: Phase One Synthesis Report

Bernard Wood, Dorte Kabell, Nansozi Muwanda, Francisco Sagasti

International Reference Group comprising members of the DAC Network on Development Evaluation, 2008.

2008:3 Joint Evaluation of Citizen's Voice and Accountability: Synthesis Report

Alina Rocha Menocal, Bhavna Sharma

Commissioned by Directorate-General for Development Cooperation (Belgium) – DGCD, Danish International Development Assistance – Danida, Federal Ministry for Economic Cooperation and Developmen (Germany) – BMZ, Norwegian Agency for Development Cooperation – Norad, Swedish International Development Cooperation Agency – Sida, Swiss Agency for Development and Cooperation – SDC, Department for International Development – DFID, 2008.

2009:1 Anti-Corruption Approaches: A Literature Review

Arne Disch, Endre Vigeland, Geir Sundet

Commissioned by Asian Development Bank - ADB, Danish International Development Assistance – Danida, Department for International Development - DFID, Norwegian Agency for Development Cooperation – Norad, Swedish Agency for Development Evaluation-SADEV, Swedish International Development Cooperation Agency – Sida, 2009.

2009:2 Public Financial Management Reform Literature Review

Carole Pretorius, Nico Pretorius
(Evaluation Report EV698)

Commissioned by Department for International Development – DFID, Dutch Ministry of Foreign Affairs, Swedish International Development Cooperation Agency – Sida, Canadian International Development Agency – CIDA, African Development Bank – AfDB, 2009.

2009:3 A ripple in development? Long term perspectives on the response to the Indian Ocean Tsunami: A joint follow-up evaluation of the links between relief, rehabilitation and development (LRRD)

Emery Brusset (team leader), Mihir Bhatt, Karen Bjornestad, John Cosgrave, Anne Davies, Adrian Ferf, Yashwant Deshmukh, Joohi Haleem, Silvia Hidalgo, Yulia Immajati, Ramani Jayasundere, Annina Mattsson, Naushan Muhaimin, Adam Pain, Riccardo Polastro, Treena Wu.

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Ministry for Plan Implementation, Sri Lanka, Ministry for National Building, Sri Lanka; ISDR, Bangkok; IFRC, Bangkok; CARE International;OCHA; UNICEF, 2009.

2009:3:1 A ripple in development? Document review: Annotated bibliography prepared for the joint follow-up evaluation of the links between relief, rehabilitation and development (LRRD) in responses to the Indian Ocean tsunami

John Cosgrave, with the assistance of: Emery Brusset, Mihir Bhatt, Yashwant Deshmukh, Lucia Fernandez, Yulia Immajati, Ramani Jayasundere, Annina Mattsson, Naushan Muhaimin, Riccardo Polastro

Commissioned by LRRD2 Joint Steering Committee, Sida; Norad; Danida; the Netherlands Ministry for Foreign Affairs; CIDA; BAPPENAS, Indonesia; BRR, Indonesia; Ministry for Plan Implementation, Sri Lanka; Ministry for National Building, Sri Lanka; ISDR, Bangkok; IFRC, Bangkok; CARE International; OCHA; UNICEF, 2009.

2009:3:2 A ripple in development? Long term perspectives on the response to the Indian Ocean Tsunami: A joint follow-up evaluation of the links between relief, rehabilitation and development (LRRD) – Summary Report

Emery Brusset (team leader), Mihir Bhatt, Karen Bjornestad, John Cosgrave, Anne Davies, Adrian Ferf, Yashwant Deshmukh, Joohi Haleem, Silvia Hidalgo, Yulia Immajati, Ramani Jayasundere, Annina Mattsson, Naushan Muhaimin, Adam Pain, Riccardo Polastro, Treena Wu.

Commissioned by LRRD2 Joint Steering Committee, Sida; Norad; Danida; the Netherlands Ministry for Foreign Affairs; CIDA; BAPPENAS, Indonesia; BRR, Indonesia; Ministry for Plan Implementation, Sri Lanka; Ministry for National Building, Sri Lanka; ISDR, Bangkok; IFRC, Bangkok; CARE International;OCHA; UNICEF, 2009.

2010:1 Evaluation of the Joint Assistance Strategy for Zambia (JASZ) 2007–2010.

Anne Thomson, Dennis Chiwele, Oliver Saasa, Sam Gibson

Commissioned by Ministry of Foreign Affairs of Denmark – Danida, Swedish International Development Cooperation Agency – Sida, Irish Aid, 2010.

2011:1 Supporting Child Rights – Synthesis of Lessons Learned in Four Countries: Final Report

Arne Tostesen, Hugo Stokke, Sven Trygged, Kate Halvorsen

Commisioned by Swedish International Development Agency – Sida and Norwegian Agency for Development Cooperation – Norad, 2011.

2011:2 Aiding the Peace. A Multi-Donor Evaluation of Support to Conflict Prevention and Peacebuilding in Southern Sudan 2005–2010. Final Report

Jon Bennett, Emery Brusset, Chris Barnett, Sara Pantuliano, Wendy Fenton, Anthony Vaux

Commissioned by the Evaluation Departments of Norwegian Agency for Development Cooperation – NORAD, United Kingdom Department for International Development – DFID, Asian Development Bank – ADB, Swedish Agency for Development Evaluation – Sadev, Swedish International Development Cooperation Agency – Sida and the Ministry of Foreign Affairs of Denmark – Danida, 2011.

2012:1 Joint Evaluation of Support to Anti-Corruption Efforts Synthesis 2002–2009

Derek Poate, Charlotte Vaillant

Commissioned by the Evaluation Departments of Norwegian Agency for Development Cooperation – NORAD, United Kingdom Department for International Development – DFID, Asian Development Bank – ADB, Swedish Agency for Development Evaluation – Sadev, Swedish International Development Cooperation Agency – Sida and the Ministry of Foreign Affairs of Denmark – Danida, 2012.

2012:2 Joint Evaluation of Support to Anti-Corruption Efforts Bangladesh Country Report

Derek Poate, Charlotte Vaillant , Imran Ahmed, Deborah Mansfield, Mozammel Hoque, Zarina Rahman Khan

Commissioned by the Evaluation Departments of Norwegian Agency for Development Cooperation – NORAD, United Kingdom Department for International Development – DFID, Asian Development Bank – ADB, Swedish Agency for Development Evaluation – Sadev, Swedish International Development Cooperation Agency – Sida and the Ministry of Foreign Affairs of Denmark – Danida, 2012.

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2012:5 Joint Evaluation of Support to Anti-Corruption Efforts Vietnam Country Report

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2012:6 Joint Evaluation of Support to Anti-Corruption Efforts Zambia Country Report

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Commissioned by the Evaluation Departments of Norwegian Agency for Development Cooperation – NORAD, United Kingdom Department for International Development – DFID, Asian Development Bank – ADB, Swedish Agency for Development Evaluation – Sadev, Swedish International Development Cooperation Agency – Sida and the Ministry of Foreign Affairs of Denmark – Danida, 2012.

Joint Evaluation of Support to Anti-Corruption Efforts Bangladesh Country Report.

This evaluation is concerned with support to anti-corruption (AC)-related programmes over the period 2002-10 by the Asian Development Bank (ADB), Denmark, Norway, Sweden and the United Kingdom (UK). It was produced on the basis of documentation review, interviews with stakeholders at the headquarters of the donors and in Dhaka, and a field visit to Sirajganj district. The visit to Bangladesh took place in November 2009.

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