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Evaluation of Norway's Anti-Corruption Efforts as part of its Development Policy and Assistance



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Foreword

The year 2030 is just a decade away and getting results in the fight against corruption will be critical for achieving the Sustainable Development Goals (SDGs). Norway spends a large share of its development assistance in “high need, high risk” countries: poor countries with challenging socio-economic environments, often combined with security concerns and high risk of corruption.

Norway's anti-corruption efforts range from upholding the principle of zero tolerance against corruption in the management of Norwegian development assistance and providing direct assistance to programmes, projects and partners to addressing anti-corruption as a cross-cutting concern and strengthening international norms and standards against corruption.

This evaluation assesses Norway's anti-corruption efforts from 2010 to 2019. Norway has contributed to important results from its efforts to strengthen international norms and standards against corruption, while there remains a potential for further gains in other areas. The evaluation provides a timely reminder that, while the current anti-corruption effort is expressed in a number of different documents, there is no comprehensive planning and reporting framework for the

effort. The evaluation calls for a formal documentation of a strategy to promote effective coordination across interventions and stakeholders with varying expertise and experience, and for working with agencies with different organisational mandates, cultures and priorities.

Norway leads and supports many anti-corruption initiatives of varying size and duration. There is a justified rationale for engaging in nearly all the initiatives examined in this evaluation. Norway has often made relevant contributions, but impacts may fall short because of insufficient attention, resources, and links across the initiatives. We hope this evaluation provides useful information for strengthening the Norwegian effort to fight corruption and to achieve the SDGs, to which Norway remains committed in the coming years.

Oslo, September 2020



Siv J. Lillestøl

Acting Director, Evaluation Department



Executive Summary

This synthesis report is the final deliverable of the evaluation of Norway's anti-corruption (AC) efforts as part of its development policy and assistance covering the period 2010-2019. It provides an overview of findings, conclusions and recommendations, drawing its main evidence from a desk-based study, a staff survey, and five case studies (Zero-Tolerance Policy (ZTP), Somalia, the global health sector, the climate and environment sector and global advocacy). In total, the evaluation team consulted more than 200 documents and interviewed 250 stakeholders, at headquarters and during country visits in Kenya/Somalia and Indonesia. In addition, 195 Embassy and Oslo-based staff from the Ministry of Foreign Affairs (MFA)/Norad responded to a staff survey, corresponding to a 66 per cent response rate.

MAIN CONCLUSIONS

Norway's AC efforts as part of its development policy and assistance consist of:

- Upholding the principle of zero tolerance against corruption in Norwegian development assistance;
- Addressing AC as a cross-cutting concern;

- Promoting AC as a distinct component of Norway's development assistance through programmes, projects and partner dialogue; and
- Strengthening international norms and standards against corruption.

The Norwegian MFA does not have a single AC strategy document that covers all the above categories. Instead, various public documents have been used as main references. The evaluation team finds, however, that these public documents do not provide a comprehensive overview of Norway's AC efforts, with some AC elements remaining implicit and poorly-articulated. In addition, the links across the four categories have not been sufficiently explored.

Zero-Tolerance Policy

ZTP is mostly understood by external actors as dealing with suspected irregularities in the use of Norwegian development assistance. In contrast, internally, the MFA considers that ZTP covers all stages of the project cycle from having adequate preventive measures

against irregularities to launching investigation and sanctions.

The evaluation finds that ZTP is not yet uniformly applied across all delivery channels and partners, despite recent efforts by the MFA/Norad to harmonise ZTP requirements with multilaterals. The information on specific corruption cases handled by multilaterals and involving Norwegian development assistance in particular remains partial. This is despite multilateral aid amounting to 56 per cent of Norway's development assistance (2018).

The investigation cases analysed in the ZTP case study show that suspected irregularities can be traced back to weaknesses at all stages of the project cycle, from partner assessment and selection to financial management and reporting. Operationalising ZTP is also particularly challenging and costly in fragile states, where corruption is systemic. There is nonetheless good evidence to show that Non-Governmental Organisations (NGOs) have strengthened their risk and grant management practices significantly over the years in response to ZTP



requirements from Norway and other donors. Multilaterals have also invested in their risk management and oversight systems, albeit to varying degrees.

In Somalia, under the so-called Special Financing Facility (SFF) in 2013-2014, Norway introduced for the first time complementary safeguard mechanisms to provide support to the federal government. This has both helped mitigate against the risk of aid misuse and promoted reforms, although the case study cautions that the fiduciary risks may still outweigh any long-term benefits.

Because of ZTP sanctions, some partner organisations have on occasion had to cease their operations due to reports of corruption, which in turn negatively impacted on their beneficiaries. Norwegian NGOs are contractually required to repay expenditure that their partners cannot document to the required standard. While they have welcomed the relaxing of Norway's repayment rule since 2018, this has in practice had limited impact, as in most cases they still don't qualify for the less strict repayment option. The evaluation finds that the ZTP part dealing with investigations and sanctions one-sidedly focuses on punitive measures. This is not an optimal strategy to support the capacity of weaker southern partners to strengthening their capacities for financial management and preventing corruption.

Anti-Corruption as a cross-cutting issue

The MFA is publicly committed to addressing AC as a cross-cutting issue, alongside gender, human rights, and climate and environment. Since 2017, operationalising AC as a cross-cutting issue has focused on using a risk-based, do no harm, approach. This approach consists of minimising the external risk that programmes and projects generate unintended effects in the form of creating or perpetuating corruption in partner countries. This do no harm approach has not worked well in practice. In contrast, the evaluation finds some positive examples of programmes and projects incorporating AC elements in their design (also referred to as doing good). These doing good requirements were dropped from the Norwegian MFA's Grant Management Assistant from 2017.

More generally, the evaluation finds that Norway MFA has not paid the same level of attention to AC as a cross-cutting issue across priority sectors: For example, while the MFA/Norad have mainstreamed AC in the climate and forestry sector (under Norway's International Climate and Forest Initiative (NICFI)), this is not the case for global health, despite evidence of corruption in the health sector, too.

Anti-Corruption as a distinct component

In the absence of MFA/Norad definition, AC as a distinct component is defined by this evaluation as programmes and projects that support the fight against corruption head-on and/or promote accountability, transparency and integrity. This is in line with Norway's commitment to Sustainable Development Goal (SDG) 16. A total of 569 annual grants, totalling NOK 1.18 billion over the period 2010-2018, were found to have a distinct AC component, in Norway's aid database. These were found not just in governance but also in some priority sectors (notably environment).

The sampled interventions – namely, MFA/Norad's support for global AC initiatives; support to Public Finance Management (PFM) reforms in Somalia, and AC efforts in forestry in Indonesia – were found to be highly relevant to partner countries' needs and priorities. They have also been effective, in recovering stolen assets, strengthening individual AC institutions and promoting local participation. These interventions, however, may not lead to sustainable results. In addition, there is insufficient evidence to show that the Embassies have held a regular dialogue with key stakeholders on AC-related issues in partner countries.



Global advocacy

Over the evaluation period, and despite fierce opposition from some UN member states, Norway has made a positive contribution to strengthening international norms and standards on AC, in two main areas of relevance to partner countries: (i) the United Nations Convention against Corruption (UNCAC) with a particular focus on grand corruption/vast quantities of assets; and (ii) Illicit Financial Flows (IFF)/tax evasion. This success demonstrates Norway's comparative advantage as a small and neutral country. More specifically, Norway's advocacy has been key in getting Resolution 7/2 on Vast Quantities of Assets adopted in 2017.

The evaluation finds that the MFA/Norad have been effective in working behind the scenes, and forming effective strategic partnerships with a range of key institutions and actors, from the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD DAC) to civil society organisations. The evaluation, however, finds that the role of the private sector as a potential ally has been overlooked. In addition, global commitments to AC will require continuous advocacy and development work from Norway to be fully secured.

RECOMMENDATIONS

At the time of finalising this evaluation, the MFA was undertaking in-depth institutional reforms that redefine the roles and responsibilities between the MFA and Norad. This has been reflected in the report's recommendations, which are as follows:

[Recommendation 1 \(overall\): Formulate and adopt a comprehensive AC strategy and dedicate more resources to operationalising AC efforts as part of Norway's development policy and assistance across all four categories.](#)

- The Norwegian MFA should adopt an AC strategy, which fully articulates Norway's AC efforts and, with them, its strategic goals, as part of Norway's development policy and assistance.
- New guidelines should be developed for MFA/Norad staff and their delivery partners to ensure a shared understanding of Norway's AC approach and support a more consistent operationalisation of Norway's AC efforts across all grants, sectors and countries (including fragile states) and all four categories.
- The Norwegian MFA and Norad departments at HQ should invest more resources in building AC expertise

in their respective sectors and regions, with fragile states receiving special emphasis. Recommended actions include: to establish dedicated AC expertise and/or focal points, to organise more regular training (including through U4) and consultations (including with multilaterals); and to promote learning, including through the use of shared knowledge management platforms.

- Norad and the MFA should develop a more coordinated and systematic approach to learning what works and does not work in relation to AC, notably by introducing a knowledge management platform covering all four AC categories.
- Ministries other than the MFA that have also developed AC competences as part of Norway's development assistance and policy, most notably the Ministry of Climate and Environment (KLD), should be fully associated to future steps taken by the MFA to formulate and adopt an AC strategy and associated guidelines.

[Recommendation 2 \(Zero-Tolerance Policy\): Continue to strengthen the operationalisation of Norway's ZTP, making it more uniform and transparent across all aid delivery channels.](#)

- The MFA/Norad should make the part of ZTP dealing with investigations and sanctions more flexible, proportional and system-strengthening focused. When working with NGOs, the MFA should notably consider introducing new ZTP elements to support more differentiation in the response to financial irregularities of different scale and types, which complements punitive measures with incentives for supporting southern partners to strengthen their capacities for financial management and control.
- The Norwegian aid administration needs to put in place an internal mechanism for a more systematic monitoring of cases of aid misuse that are handled by multilateral partners and involve Norwegian money. More than half of Norwegian aid is currently handled by multilaterals, yet Norway MFA, including Embassies, have little visibility on ongoing investigations involving Norway aid money in their partner countries. Akin to cases handled by NGOs, this information should be made public once the investigations are closed.
- The MFA and Norad should continue to invest in in-depth assessments, when working with new partners in partner countries, in particular fragile states, where corruption is often systemic and the risk of aid misuse particularly high.

Recommendation 3 (Anti-Corruption as a cross-cutting issue):w Adopt a more holistic and strategic approach to AC as a cross-cutting issue, and step up efforts towards its operationalisation at grant, sector and country level.

- The MFA's dual approach of combining "do no harm" and integrating positive AC elements in all programmes and projects should be reintroduced using a broader definition of AC (incl. transparency, accountability and integrity) and a stronger focus on reporting results (see recommendation 4).
- Requirements for addressing AC as a cross-cutting issue should be broadened to include not just individual programmes and projects but also all priority sectors and partner countries. This should include setting up measurable AC objectives, based on relevant evidence (including through consultations).
- Norad should work with expert organisations¹ to help the Norwegian MFA and Norad strengthen the operationalisation of their do no harm approach, with fragile states receiving special emphasis.

¹ see for example the work conducted by ALNAP and Collaborative Learning Projects (CDA).

Recommendation 4 (Anti-Corruption as a distinct component): Promote AC efforts in partner countries, by combining support to local and global initiatives and adopting a result-based approach.

- Norway's support to global initiatives should be complemented by in-country support in partner countries. This could involve innovative, low-cost, fast-disbursing initiatives to support local AC initiatives.
- The MFA should continue to work closely with NGOs on fighting corruption head-on and promoting accountability, transparency and integrity in all sectors and countries, with fragile states receiving special emphasis.
- The MFA, in partnership with other donors, should also work more systematically and visibly on promoting public finance accountability, transparency and integrity, not only through support to Public Finance Management but also as part of their dialogue with governments.
- Norway's AC efforts (as the primary as well as secondary objective) should come with an increased commitment to measuring results at grant, sector and embassy levels.



- The MFA also needs to start looking at more innovative approaches, such as those promoting multi-stakeholder action (involving notably the private sector).

Recommendation 5 (global advocacy, dialogue): Continue to push for a more ambitious global AC advocacy agenda and promote more regular dialogue with partner countries.

- The global advocacy agenda should continue to remain ambitious, not just to focus on IFF and grand corruption, but also on the issue of tax havens. Strategic partnership should also be broadened to include the private sector.
- Embassies should report against their AC efforts more regularly and comprehensively by capturing both processes (such as dialogue, consultations, diagnosis, and external communication) and results (see previous recommendation).
- The link with the global AC agenda should also be made explicit in the Embassies' AC efforts. More specifically, International norms and standards should feature more explicitly in political dialogue between Norway and governments/non-state actors at the national level than is currently the case.



Introduction

This report is the final deliverable of an evaluation of Norway's anti-corruption (AC) efforts as part of its development policy and assistance in the period 2010-2019.

1.1 Objectives of the Evaluation

The purpose of this evaluation is to contribute to strengthening Norway's AC efforts as part of its development policy and assistance, and to enhance learning about such efforts for other actors seeking to strengthen their AC efforts.

More specifically, the evaluation:

- Maps Norway's AC initiatives as part of its overall development policy and assistance;

- Assesses the relevance, effectiveness and sustainability of Norway's AC efforts;
- Presents key findings and conclusions based on the available evidence; and
- Recommends improvements to Norway's AC efforts.

1.2 Scope

As described in the Terms of Reference (ToR), Norway's AC efforts encompass the following four categories:

- Upholding the principle of zero tolerance for corruption in Norwegian development assistance;
- AC as a cross-cutting issue, seeking to avoid corruption resulting from Norwegian development assistance;
- AC as a distinct component of Norway's development assistance, both through programmes/projects and through partner dialogue; and

- Strengthening international norms and standards against corruption, including prevention of Illicit Financial Flows (IFF) and money laundering.

In addition to three of the evaluation criteria established by the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD DAC) – relevance, effectiveness and sustainability – this evaluation introduces two new criteria, flexibility and learning, drawn from the Problem-Driven Iterative Adaptation (PDIA) model.²

² For a definition of the PDIA, please refer to Andrews (2016) <https://www.oecd.org/dac/accountable-effective-institutions/Governance%20Notebook%202.3%20Andrews%20et%20al.pdf>



Evaluation Approach and Methodology

2.1 Analytical Framework

As part of the inception phase, and based on available documentation and interviews with key stakeholders in Oslo, a Theory of Change (ToC) was developed to capture all four Anti-Corruption (AC) categories and identify key assumptions and causal links underpinning Norway's AC efforts. The results from this exercise, which are presented in Annex 3, have informed the conclusions and recommendations of the synthesis report.

2.2 Inception Phase and Choice of Case Studies

This synthesis report provides a summary of findings from a desk-based study conducted during the inception phase, four thematic case studies, one country case study, and a staff survey. The four case studies were selected and designed to cover the four AC categories, based on preliminary findings from the inception desk-based study (see Box 1). Each case study is available as a stand-alone document and includes more detailed findings, conclusions and recommendations on their respective topics (See Annex 5).

BOX 1: OVERVIEW OF THE CASE STUDIES AND OTHER SOURCES OF THE SYNTHESIS REPORT

Desk-based study: Supplemented by interviews with key staff in Oslo, the desk-based study involved a number of elements, including a review of all relevant policy documents from the Norwegian Ministry of Foreign Affairs (MFA) and Norad; in the inception phase of the evaluation a mapping of AC efforts across all sectors of Norway's development cooperation, as reported in Norad aid statistics for the period 2010-2018; a preliminary analysis of the MFA's Foreign Service Control Unit (FSCU), reports; and a qualitative review of 28 (AC and non-AC specific) programmes and projects randomly selected to cover all main sectors and the span of the review period – from 2010, 2014 and 2018, respectively.

Country case study: Somalia was selected for a number of reasons: it is a fragile state and one of the largest recipients of Norwegian development assistance. According to Transparency International, it is also the most corrupt country in the world. This country case study looks at Norway's AC efforts from an Embassy perspective.

Sector case studies: Two of Norway's five priority sectors were analysed: the Health Sector (with emphasis on major multilateral health organisations) and the Climate & Forestry Sector (with focus on preventing deforestation in Indonesia).

Zero-Tolerance Policy case study: The study of Norway's zero-tolerance policy (ZTP) assesses how the principle of zero tolerance has been operationalised through all stages of the project cycle – from preventive to corrective actions.

Global advocacy case study: The study assesses the links between Norway's global advocacy and the development agenda, with special emphasis on MFA support to the fight against Illicit Financial Flows (IFF) and MFA participation in UN processes.

Staff survey: The views of Embassy and Oslo-based staff in a survey combining closed and open questions on Norway's AC efforts across all four categories. A total of 195 staff responded, corresponding to 66 % of those invited.



2.3 Data Collection

A separate data collection methodology was developed for each case study to ensure that each would draw on the most relevant data sources and data collection methods. The main sources of data were as follows:

DOCUMENTATION:

- Internal documentation from the MFA, including policy documents; aid and investigation statistics; project documentation; partner assessments, risk analyses and context analyses; and relevant evaluation reports as available publicly or extracted from the MFA/Norad database.
- Internal documentation from the Norwegian Ministry of Climate and Environment (KLD), including policy documents; project documentation; partner assessments, risk analyses and context analyses.
- External documentation on selected countries, sectors and projects from donors, think-tanks, non-governmental organisations (NGOs) and the media.
- Academic research and studies, including from U4.

Two country visits to *Somalia* and *Indonesia* were

organised for the *Somalia* and *Climate & Forestry* case studies. In the two sampled countries, all relevant actors, including the Norwegian MFA, delivery partners, key government officials, other bilateral and multilateral donors, NGOs and local media were interviewed.

The evaluation team also travelled to Oslo, Bergen, and Geneva to meet with the following *stakeholders*:

- MFA/Norad and KLD public officials as well as Norwegian NGOs based in Oslo (these views were also captured in the staff survey, see Box 1).
- Other donors, experts and NGO staff at headquarters (HQ), including U4 and UN organisations (UN Development Programme, World Health Organisation, United Nations Office on Drugs and Crime (UNODC))

A list of people met is available in Annex 4 and a bibliography in References.

2.4 Limitations

This evaluation comes with a number of limitations:

- The selection of specific sectors, countries and

initiatives was done using a purposeful sampling approach. While this selection has provided a sufficiently broad evidence base, Norway's AC efforts in other sectors, countries and initiatives are only partly captured as part of the desk-based study.

- As well as being very context and sector specific, corruption is hard to measure. Contextual factors and the presence of other donors also contribute to Norway's AC efforts .
- The documentary evidence produced by MFA/Norad (which the evaluation team had access to through their database) is not complete and does not include result-based monitoring reports, as also confirmed in a recent evaluation on results-based management in Norwegian development assistance.³

2.5 Structure of the Report

Section 3 of the report presents the context of the AC agenda, globally as well as in Norway's partner countries, over the review period. Section 4 starts with a

³ <https://norad.no/contentassets/8d8b2cbc48dd4a29872580a4845ed3d1/4.18-evaluation-of-the-norwegian-aid-administrations-practice-of-rbm.pdf>



mapping of Norway's AC strategies, interventions and initiatives, before presenting the main evaluation findings along the four AC categories with explicit reference to the corresponding evaluation questions in footnotes. Section 4 ends with a brief assessment of organisational issues. Section 5 provides the conclusions, lessons and recommendations from the evaluation.



Context

3.1 The Global Anti-Corruption Landscape

The anti-corruption (AC) landscape has evolved significantly since Norway's AC efforts were last evaluated as part of the Joint Evaluation of Support to Anti-corruption Efforts 2002-2009 (Norad, 2011).⁴

The global AC agenda has gained in importance and momentum. Corruption scandals, such as LuxLeaks, the Panama Papers and the Paradise Papers, have revealed the complex web of individuals and private entities and the loopholes in the financial system that have not only facilitated continued corruption, but also had global ramifications, including in partner countries.

The donor community has strengthened its commitment to fighting corruption as part of its support to the Sustainable Development Goals (SDGs). Since 2015, the fight against corruption has gained new momentum, reflected in the adoption by the international community

of the Agenda 2030 for Sustainable Development, and in particular SDG 16. This goal of peaceful, just and inclusive societies and its targets on reducing bribery, strengthening institutions and accessing information are not only valuable aspirations in their own right, they are also vital conditions for the achievement of all of the 17 goals.

Aid modalities have continued to evolve, with multilaterals playing an increasingly important role as main channels and delivery partners. In 2018, 56 % of Norway's aid was channelled through multilateral organisations, compared to 48 % in 2010.⁵ Norway has contributed to an increasingly significant number of global and multi-donor trust funds over the years. Multilaterals, starting with the World Bank, have stepped up their engagement in the international AC forums and become key supporters of regional and global AC initiatives.⁶

The academic discourse on what works and what does

not when fighting corruption in developing countries has evolved and has come to challenge donors' traditional approaches. Donors have traditionally combined technical support to AC policies, laws, institutions and government ministries with demand-side support to civil society advocacy and awareness raising. With corruption being endemic and systemic in partner countries, there is a recognition that putting pressure on the duty-bearers, i.e. the government and the private sector, may not be sufficient, and that systemic corruption persists because of a so-called collective action problem, where individuals gain little from abstaining from or resisting corruption if they cannot trust that others will do the same.⁷ In such contexts, fighting corruption requires coordinated AC efforts, involving all stakeholders concerned.⁸

The link between global corruption and the financing of terrorists has also received increased attention. This

4 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/213935/evaluation-anti-corruption-efforts2002-2009.pdf

5 <https://norad.no/en/front/toolspublications/norwegian-aid-statistics>

6 <https://www.worldbank.org/en/topic/governance/brief/anti-corruption>

7 See for example Rothstein, B. (2011). Anti-corruption: the indirect 'big bang' approach. *Review of International Political Economy*, 18 (2), 228-250.

8 Corruption and Collective Action, Heather Marquette and Caryn Peiffer, January 2015, <https://www.u4.no/publications/corruption-and-collective-action.pdf>



is a matter of particular relevance to Norway's development assistance: in 2018, the top ten largest recipients of Norwegian development assistance included five fragile states (Syria, Afghanistan, Palestine, South Sudan and Somalia).

3.2 Corruption and Anti-Corruption in Norway's Priority Countries

Over the review period, Norway has spent an increasingly large share of its aid in fragile states, where security and corruption issues are complex and intertwined. As shown in Table 1, seven of the ten countries that received the highest amount of Norwegian development assistance in 2018 are considered as fragile. While all ten countries score red (below 39) in the 2019 Transparency International Corruption Perception Index (CPI), there is wide variation among them. The list includes Somalia, Syria and South Sudan, the three countries perceived as the most corrupt in the world.⁹

Table 1: Corruption Perception Index for Norway's top Beneficiary Countries

	NOKm 2018	CPI 2019 Score	Rank
Syria	1,002,56	13	178
Afghanistan	794,97	16	173
Brazil	685,56	35	106
Palestine	636,79	n.a.	n.a.
South Sudan	616,37	12	179
Somalia	543,12	9	180
Lebanon	524,12	28	137
Ethiopia	520,37	37	96
Malawi	475,27	31	123
Colombia	411,11	37	96

In highly corrupt countries, corruption – and the ensuing misuse of public funds – is intrinsically driven by a complex (and in fragile states, ever-changing) web of local, national and global contextual and political economy factors. Sector corruption tends to be pervasive and systemic, with corruption risks found at all stages of the value chain from policy formulation to service delivery.

On the AC front, all of Norway's priority countries except for Somalia have ratified the United Nations Convention against Corruption (UNCAC), but implementation has remained slow. Fighting corruption in these countries is key to achieving development goals. As further discussed in the thematic sector case studies, corruption in the health sector costs thousands of lives every year, just as corruption was found to be one of the main causes of deforestation in Indonesia.

In Somalia and other fragile states, corruption is one of the main drivers of conflict and a key hindrance to the achievement of these countries' statebuilding and peacebuilding goals. Country experts in Somalia consider that the risk of corruption is likely to increase as the country makes further progress with its oil exploration.

⁹ Somalia (180), South Sudan (179) and Syria (178), followed by Afghanistan (173).

Findings

4.1 Mapping Norway's Anti-Corruption Efforts

This section, which mostly draws on the desk-based review and interviews conducted during the inception phase, provides a brief overview of Norway's anti-corruption (AC) efforts as captured in strategic documents, interviews with Oslo staff and aid statistics.

NORWAY'S ANTI-CORRUPTION STRATEGIES¹⁰

There is no single strategy articulating Norway's approach to AC in partner countries. The only existing guidelines are concerned with the Zero-Tolerance Policy (ZTP)¹¹ and AC as a cross-cutting issue as part of the grant management manual (subsequently referred to as the Grant Management Assistant (GMA)).¹² In the absence of a unifying document, the Theory of Change

¹⁰ This sub-section responds to evaluation question Q1, "What have been Norway's explicit and implicit strategies for preventing and fighting corruption?".

¹¹ MFA (2019). "Guidelines for dealing with suspected financial irregularities in the Foreign Service," updated 11 December 2018. https://www.regjeringen.no/en/dep/ud/about_mfa/dealing_irregularities/id2638099/

¹² Grant Management Manual. V04 Guide to assessment of results and risk management, including cross-cutting issues. Final version 06.06.17; and revised 2019 version.

(ToC) underpinning Norway's AC efforts remains largely implicit.

AC strategies for countries and sectors are also poorly documented, as shown in the Somalia and Climate & Forestry case studies. This lack of explicit AC strategies at global, sector and country levels has reduced the opportunities for the Ministry of Foreign Affairs (MFA) to monitor its AC efforts, build on new evidence and support learning. There is currently no shared understanding of AC as a cross-cutting issue¹³, nor even a shared definition of AC as a distinct component. The link between Norway's AC efforts and the choice and range of aid delivery mechanisms (such as the use of country systems in Somalia and the results-based financing approach used by Norway's International Climate and Forest Initiative (NICFI) in Indonesia and elsewhere) is also missing.

THE ZERO-TOLERANCE POLICY

The MFA committed to a ZTP in 2007.¹⁴ The ZTP is mostly understood by external actors as dealing with suspected

¹³ Staff survey; OECD DAC Peer Review (2019); stakeholder interviews.

¹⁴ MFA, Proposition No1 (2006-2007) of the Storting.

irregularities in the use of Norwegian development assistance. A broader definition of the ZTP – as discussed with the MFA during the evaluation – covers all stages of the project cycle from preventive measures to investigation and sanctions. The operationalisation of the ZTP is discussed in section 4.2.

ANTI-CORRUPTION AS A CROSS-CUTTING ISSUE

In Norway's public discourse, AC is heralded as a cross-cutting priority, along with human rights, women's rights and gender equality, and climate and environment. Norway's grant management guidelines include a requirement to mainstream AC as a cross-cutting issue in all programmes and projects.

Until 2017, Norway's delivery partners were required to:

- Consider the potential negative effects of their projects using a do no harm approach, consisting of "minimising the risk of projects having unintended negative effects on the cross-cutting issues".¹⁵

¹⁵ Grant Management Manual. V04 Guide to assessment of results and risk management, including cross-cutting issues. Final version 06.06.17; Section 3.1.1, p 25.



- “Identify and seek to reinforce positive effects with regards to AC and other cross-cutting issues” and possibly “include them as separate components” (subsequently referred to as “doing good”).

The MFA/Norad subsequently decided to drop the doing good requirements and focusing only on do no harm, after an internal review was conducted in 2015¹⁶.

The operationalisation of AC as a cross-cutting issue over the review period is discussed in section 4.3.

ANTI-CORRUPTION AS A DISTINCT COMPONENT¹⁷

In the absence of an agreed definition, AC as a distinct component is defined by this evaluation as programmes and projects that support the fight against corruption and, more implicitly, seek to strengthen accountability, transparency and integrity. This definition is in line with Norway's global commitments to Sustainable Development Goal (SDG) 16. A list of all relevant grants has

¹⁶ «Tverrgående hensyn i norsk bistand,» (Crosscutting issues in Norwegian development cooperation), Section for Grant Management, 28.08.2015.

¹⁷ This sub-section responds to the evaluation question Q2, “What channels, programmes and institutions, partners and countries have been priorities to drive Norway's AC efforts as part of its overall development policy and assistance?”

been extracted from Norway's aid database, showing the following:¹⁸

- Norway is doing more to support AC efforts globally and in partner countries than indicated in previous estimates: according to the database, a total of 569 annual grants, totalling NOK 1.18 billion, were disbursed for interventions with a distinct AC component during the period 2010-2018. This is double the estimate in the background note to the Terms of Reference (ToR) for 2010-2017.
- AC interventions can be found in all Norway's priority sectors, not just governance. While 55% of AC interventions was found in the governance sector, other AC interventions come with a sector focus, with 30 % of all grants found in the environment sector.

¹⁸ <https://norad.no/en/front/toolspublications/norwegian-aid-statistics/?tab=geo>. The final list of interventions (available in excel sheet) is made of all grants in the OECD DAC governance sector sub-code “AC” (115-13) and all grants in other OECD DAC coded sectors with the following key words in their description of agreement: transparency, accountability, integrity and corruption.

- Norway has mostly worked with Non-Governmental Organisations (NGOs) as delivery partners, but also increasingly with multilaterals: 67.4 % of all grant disbursements related to AC-specific programmes and projects were allocated to NGOs in the period 2010-2018. While multilaterals only received an average of 13.6 % of all disbursements during the same period, their share peaked at 50 % in 2018, when a number of AC interventions managed by Norad started (see page overleaf).
- The MFA and Norad have managed an average of, respectively, 37 % and 62 % of all grants, although the allocation has varied significantly from year to year. Although still marginal in the aid database, the Ministry of Climate and Environment (KLD) has also provided grants for AC interventions since 2017.

Since 2018, AC as a distinct component has included Norad's new support to (i) the UN Office against Drugs and Crime (UNODC) to accelerate United Nations Convention against Corruption (UNCAC) implementation globally; (ii) the International Centre for Asset Recovery (ICAR) to support global cooperation on asset recovery; and (iii) the UNCAC NGO Coalition to make the UNODC UNCAC peer review process more inclusive. Throughout the review period, Norad has also provided continuous



support to its AC flagship, the Corruption Hunter Network (CHN), which it helped set up in 2005.¹⁹

The relevance, effectiveness and sustainability of programmes and projects with a distinct AC component are discussed in section 4.4.

Concerning the *dialogue with partner countries*, very little was found in the policy documents and guidelines. The main reference was found in the 2010 Good Governance and AC action plan, which predates the evaluation period. This action plan reflects the previous commitment that corruption will be discussed “*at least once per year in meetings with government in all Norway's priority partner countries*”. Norad/MFA staff, notably the AC unit but also Embassies²⁰, have continued to see regular dialogue on AC issues as required.

INTERNATIONAL INITIATIVES²¹

Several initiatives underscore Norway's commitment to

¹⁹ In 2019, Norad also signed an agreement with OECD to support its anti-corruption and good governance work, worth NOK13 million for 2019-21. This relatively new support is not covered in this evaluation.

²⁰ Staff survey

²¹ This sub-section responds to evaluation question Q3, “What have been the most important international initiatives driving Norway's AC efforts as part of its development cooperation and diplomacy?”.

strengthening international AC norms and standards. Norway has worked actively through the UN since signing the UNCAC convention in 2003. Apart from UNCAC and the UN Conference of the States Parties (CoSP), Norway has also supported other relevant UN-led initiatives, starting with the 2030 Agenda (including SDGs 16 and 17) and the Addis Ababa Action Agenda (2015) on Financing for Development.²² At the time of finalising this report, Norway (in the capacity of President for the UN Economic and Social Council) and Nigeria (in the capacity of President of the UN General Assembly) had just initiated the establishment of a high-level panel on financial accountability, transparency and integrity.

While not directly involved in the G7 and EU-led AC efforts, Norway has actively participated in the G20 AC agenda and has also worked in close partnership with the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD DAC) by participating in its relevant fora, task forces and working groups, notably the working group on bribery, the annual AC and integrity forum and its task force on tax and

²² According to the OECD DAC Peer Review (2019), Norway was an effective co-facilitator of preparatory processes for the Third International Conference on Financing for Development and played a constructive role in the launch of the Addis Tax Initiative (2015).

development.²³ Furthermore, Norway has been an active member of the Financial Action Task Force initially set up by the G7 and of the Council of Europe Group of States against Corruption. Finally, Norway has also supported transparency initiatives such as the Extractive Industry Transparency Initiative and the Open Government Partnership, both as a signatory member and as a donor.

Over the evaluation period, Norway's advocacy efforts have mostly been focused on strengthening international norms and standards in two main areas: (i) the UNCAC with a particular focus on grand corruption/vast quantities of assets; and (ii) Illicit Financial Flows (IFF)/tax evasion. This is discussed in section 4.5.

4.2 The Zero-Tolerance Policy²⁴

OPERATIONALISING THE ZERO-TOLERANCE POLICY

At HQ, the MFA and Norad have parallel systems for

²³ Norway is also an active member of the OECD/DAC Governance Network and the Anti-Corruption Task team (ACTT).

²⁴ This section responds to the following evaluation questions in successive order: Q5 “How has Norway operationalised its zero-tolerance policy?; Has it reduced the risk of aid misuse?”. Q6, “How has the ZTP positively or negatively affected Norway and its delivery partners' risk tolerance and risk management processes?”; Q11, “Has Norway's approach to zero tolerance led to results (unexpected and expected) in fighting corruption in partner countries?”.

implementing the ZTP, with the MFA's Foreign Service Control Unit (FSCU) and Norad Fraud and Integrity Unit (FIU) sharing responsibility for receiving warnings, investigating and enforcing the ZTP in relation to MFA funds. According to FSCU reports, there was a steady increase in the total number of reported cases from 2010 to 2015, from just over 60 a year to more than 140.²⁵ In the last four years, the number has dropped below 100. The total sums repaid to the MFA and Norad annually have remained relatively small, peaking at just over NOK 30 million and NOK 20 million in 2013 and 2019 respectively, according to FSCU statistics.

Findings from the ZTP, global health and Somalia case studies show that the ZTP is currently not uniformly applied across all delivery channels and partners. This is mostly visible when looking at contractual arrangements and data from the FSCU annual reports:

The MFA has started mainstreaming ZTP requirements in its contractual arrangements with multilateral organisations since 2015, with some negotiations still ongoing at the time of writing this report. For ten Norwegian NGOs, Norad has also requested that their anti-corruption

²⁵ The statistics include cases concerning MFA, Norad, Norec, and until 2017, Norfund.

Table 2. Financial Irregularity Leading to Sanction by MFA and Norad by Type of Partner

Category	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total	%
Norwegian NGO	14	14	27	30	33	35	40	28	51	44	316	65%
International NGO	1	1	7	2	4	4	4	8	4	5	40	8%
Local NGO	1	1	11	6	9	5	7	0	4	3	47	10%
Embassy	0	3	4	2	3	6	1	2	1	0	22	5%
Multilateral	1	0	7	5	4	3	1	0	1	2	24	5%
Bilateral	3	3	3	8	4	2	4	6	1	5	39	8%
Total	17	22	59	53	57	55	57	44	62	59	485	

efforts be made public. In Somalia, there are some differences in ZTP requirements in the contractual arrangements, depending on the types of partners, dates of negotiation, and contracting authorities (the MFA or Norad).

As shown in Table 2, a total of 65 % of all cases reported to the MFA and Norad are related to grant agreements with Norwegian NGOs. Contracts implemented by local NGOs make up 10 % of the cases, while international NGOs account for another 8 %. This means that a total of 83 % of all corruption cases dealt with by the MFA and Norad relate to contracts with NGOs.

These statistics do not tally with the distribution of Norwegian development assistance among different types of partners: in 2010-18, Norwegian NGOs and multilateral organisations accounted for average 14 % and 48 % of Norwegian development assistance, respectively, against 65 % and 5 % of reported cases.

The main reason for these contrasting figures is that the contractual arrangements with the multilaterals almost always stipulate that it is the responsibility of the multilaterals to deal with any reports of suspected corruption or other grievances. The new framework agreements, notably with UNDP and UNICEF, in principle commit the

two UN agencies to share any investigations into financial irregularities with Norway. In practice, however, no such information has been shared or stored, and was therefore not reported by FCSU.²⁶

The shift in Norwegian funding to multilaterals has taken place together with efforts to address ZTP in contractual agreements and in the strengthening of processes, such as using influence on boards to ensure that external and internal audits are made public. However, the new contractual provisions (see above) have not led to any changes in practice and there have been very few repayments of Norwegian funds, despite contracts stating that this should be considered.

In addition, the ZTP case study finds that while there is donor collaboration on individual cases, and despite efforts to mainstream ZTP requirements in UN framework agreements, there has been no explicit attempt to define how Norway's ZTP is to be coordinated with other donors, including through assigning responsibilities for follow-up.

²⁶ At present, all multilaterals share their corporate reports to Norway MFA / Norad. These reports only provide aggregate data, however, with no disaggregated data per country and donor.

In practice, the MFA/Norad uses four entry points to operationalise the ZTP, the first three being about preventive measures:

- Partner assessment and selection to ensure that delivery partners have the right capacity and systems in place and, if needed, to identify remedial actions;
- Contractual arrangements to lay out the requirements with which delivery partners need to comply in relation to the ZTP;
- Financial management and reporting, drawing from – and on occasion complementing or reinforcing – the delivery partners' financial and audit reporting mechanisms; and
- Investigation and enforcement to respond promptly and effectively to cases of suspected irregularities.

The investigation cases analysed in the ZTP case study illustrate how corruption cases can be linked back to weaknesses across all four entry points.

THE IMPACT OF THE ZERO-TOLERANCE POLICY ON RISK MANAGEMENT AND TOLERANCE

The ZTP case study and the Somalia case study both show that Norwegian as well as international NGOs

have strengthened their risk and grant management practices significantly over the years in response to ZTP requirements not just from Norway but also from other donors.

In the staff survey, half of the respondents consider multilaterals and NGOs to have effective grant management procedures in place to prevent aid misuse. Diagnosis tools, including the Multilateral Organisation Performance Assessment Network, are now well established. In its support to the Embassies, Norad's AC unit has nonetheless continued to push for more in-depth partnership assessments, especially for new partners.

The health sector case study indicates that multilateral agencies within this sector have also strengthened their financial management and ZTP practices over the years, often in response to corruption scandals. This has allowed multilateral agencies, such as Gavi and the Global Fund, to continue to operate at scale in very difficult corruption and conflict-prone environments like most fragile states. There has been some variation in practice, however, as highlighted in Box 2.



BOX 2: ZERO-TOLERANCE POLICY IN PRACTICE – FOCUS ON MULTILATERALS

According to the *global health case study*, strong risk management mechanisms that Gavi and Global Fund have put in place are evidence that multilaterals have responded actively to donors, putting in place extensive safeguarding mechanisms in the last five years, often in response to major corruption scandals.²⁷ The benefits of a strong adoption of this approach in strengthening controls and in limiting aid misuse are commented on elsewhere. The fact that health assistance is being delivered at scale in very difficult, conflict affected countries such as The Democratic Republic of the Congo (DRC) without being overwhelmed by corruption is an astonishing achievement of the international health community. The Global Fund, in particular, has an audit and financial committee that meets on a quarterly basis and which the global health

case study characterises as substantive and well attended by the Executive team.

On the other hand, the evaluation team finds that WHO provides much less assurance. The oversight committee, Independent Expert Oversight and Advisory Committee (IEOAC), has only an advisory role; the audit and investigation teams are very small; audits are not published; World Health Organisation (WHO) country offices do not report frauds or concerns, nor investigate them, unless they choose to; The evaluation team was unable to identify anyone in the upper echelons of WHO holding overall responsibility for AC, nor anyone with a similar role for risk management.

On the plus side, the desire to change this situation has recently been expressed by WHO top leadership. The existence of the Compliance, Risk and Ethics department (CRE), and the strengthening of IOS are signs in the right direction, as is the fact that Norway is clearly pushing on this agenda.

The *ZTP case study*, which looks at the UNDP, makes the following findings:

- *The systems and routines of UNDP incorporate provisions for implementing a ZTP*
- *UNDP scores well on international ratings such as The Multilateral Organisation Performance Assessment Network (MOPAN) regarding anti-corruption measures*
- *UNDP's Office of Audit and Investigations (OAI) combines the functions of internal control and investigation. Also, investigations may produce management letters, which extends the investigation function beyond the narrower sanctioning focus of the Norwegian system.*
- *The MFA has worked to ensure that ZTP is incorporated in its agreements with UNDP, but our findings indicate little impact of UNDP's commitment to sharing information on investigations*
- *Findings from Somalia indicate that the risk of aid misuse has also affected UNDP's operations*

²⁷ In 2010, Germany, Ireland and Sweden suspended payments to the Global Fund over the corrupt use of grants by African countries <https://www.theguardian.com/society/sarah-boseley-global-health/2011/jan/28/aids-infectiousdiseases>

The lack of reporting remains a concern. In the survey, half of the respondents lack confidence that Norway's partners routinely report all alleged cases of misuse to the relevant Embassy or Oslo. This sentiment was shared by the international community in Somalia, where only one case of suspected financial irregularities (see the ZTP case study) was reported to the MFA during the review period, notwithstanding the very high risk of aid misuse in this country. Although stronger risk and grant management practices may have helped detect aid misuse at an early stage (before any payments were made), the ZTP and Somalia case studies both conclude that this is more likely a question of under-reporting.

While acknowledging the need for a ZTP, representatives of Norwegian NGOs find the MFA's approach – as it is implemented – to be unduly punitive. Furthermore, it does not appear to be well calibrated for either the type of high-risk context in which the NGOs operate, or for the administrative weakness of many of their local partners. Norwegian NGOs have particularly criticised the ZTP's repayment rule, which, until 2018, required the grant manager to refund all lost funds to the MFA, while ensuring that all project activities be implemented as planned. This rule was relaxed under the new guidelines, partly in response to the NGOs' concern, with the grantee no longer being required to repay the money to the Norwegian government

if certain conditions are met. Statistics from the first year after the new rule came into force, however, show that only a very small share of the cases have met these conditions.

The Norwegian NGOs have continued to lobby the MFA to make the ZTP requirements more proportional and in tune with the "leaving no one behind" agenda (see Box 3).

BOX 3: OVERVIEW OF NORWEGIAN NGOS' CONCERNS IN RELATION TO THE ZERO-TOLERANCE POLICY REQUIREMENTS

In November 2019, the civil society AC working group submitted a letter of concern to the MFA regarding the implementation of the ZTP. They list seven concerns:

- The practice works against the "leave no one behind" agenda, as it provides disincentives to partner with weak organisations in vulnerable areas.
- The practice does not sufficiently consider the interest of vulnerable target groups. Funding freezes and claims for repayment can have severely negative impacts.
- The ZTP does not provide a fair share of the risk of operating in high-risk areas.

- The response is lacking proportionality. There is little or no differentiation according to the scale and severity of the irregularity (for example, is it fair to claim repayment of funds that have been stolen by external actors?).
- The implementation of the ZTP is skewed as the majority of cases opened concerns NGOs, which only manage a relatively small share of the aid budget.
- The practice provides few incentives for whistleblowers, who risk losing their jobs and salaries as reactions tend to be very punitive.
- The practice drains resources, not only for compensation, but for administering and investigating cases.



These views were shared by NGOs in Somalia. While humanitarian NGOs considered security issues to be the main obstacle to working in vulnerable areas, they also had to invest significant efforts into building local capacity and developing the right systems. The Health, Climate & Forestry and Somalia case studies all provide examples of capacity building support provided by the MFA (directly or indirectly through international NGOs) to local organisations, allowing them to expand and become Norway's partners in their own right.

Finally, the Somalia case study illustrates how working in vulnerable areas requires additional safeguards, which comes at an extra cost. Norway was the first donor in this country to provide support to the Federal Government through a so-called Special Financing Facility (SFF) in 2013-2014. The SFF, which, according to Norway aid statistics, led to NOK 75 million in transfers to government in 2013-2014, had an extensive governance and operational apparatus, which cost an estimated NOK 27.6 million in consultancy fees – a significant amount, albeit less than reported in the press.²⁸

²⁸ Aid statistics available on <https://norad.no/en/front/toolspublications/norwegian-aid-statistics/?tab=geo> indicate that Norway's initial pledge for the SFF, which amounted to USD 28 million (equivalent to NOK 250 million), was not achieved.

UNEXPECTED RESULTS

Because of ZTP sanctions, partner organisations have chosen to cease operations, which has in turn led to negative impacts on beneficiaries. In Somalia, for example, the Norwegian People's Aid chose to cease its operation in the country when Norwegian funding was discontinued from 2016. Conversely, the Somalia case

study shows that an ineffective ZTP and continuous aid misuse can cause harm as well by creating or perpetuating corrupt practices in the country (see section 4.3).

The link between the ZTP, AC as a distinct component and AC as a cross-cutting issue is discussed in Box 4.

BOX 4: LINKS BETWEEN THE ZERO-TOLERANCE POLICY, ANTI-CORRUPTION AS A DISTINCT COMPONENT AND ANTI-CORRUPTION AS A CROSS-CUTTING ISSUE

According to Norad's FIU, protecting Norwegian funds against misuse also aims to reduce corruption in partner countries. In Somalia, Norway – along with the World Bank and the European Union in particular – have argued that when combined with complementary safeguard mechanisms, the use of country systems not only helps to mitigate against the risk of aid misuse, but also promotes public financial management (PFM) reforms, which

in turn contribute to AC. However, the Somalia case study cautions against relying on the weak evidence that currently exists to show that the potential long-term benefits of using country systems outweigh the more immediate fiduciary, reputational and operational risks.

There is also a link between the ZTP and “do no harm”. As explained in an internal Norad document, “the first line of defence to do no harm is to apply good aid management and, in doing so, not provide opportunities for aid misuse that could fuel and entrench corruption in the country”.



CONCLUSIONS

Based on the findings above, the main conclusions drawn from the ZTP, Somalia and health sector case studies, are as follows:

Norway MFA's partners – including the multilaterals – share the same commitment to ZTP. The evaluation, however, concurs with NGOs' views that ZTP does not provide a fair share of the risk of operating in high-risk areas. This is in large part because there is no differentiation in the response to financial irregularities depending on the scale and type and in part because multilaterals, in contrast with NGOs, which are often the front line delivery partners, are not compelled to report against individual cases of aid misuse.

In addition, a country like Somalia, where corruption is systemic, the focus of the ZTP on individual grants does not allow for more systematic forms of corruption to be tackled. In Somalia, this includes well-known alleged practices, such as paying bribes to win contracts, access public services, and/or facilitate access to territories controlled by Al-Shabaab. In addition, delivery partners in a country like Somalia need to remain vigilant and constantly adopt new approaches to secure their funds, as corrupt networks find new ways of capturing donor resources.

Finally, in practice, the ZTP is increasingly challenged by the complex web of UN and other international and national delivery partners working through multilaterals in some sectors, starting with global health. This aid architecture makes it difficult for individual donors (including Norway) to have a complete overview of the risk of corruption specifically involving their aid money. This was recently confirmed by the OECD (OECD 2019, FT): “There is no evidence that the upward trend in multilateral financing has resulted in any efficiencies in corruption risk management. In some instances, it has rendered Norway ill-placed to effectively track corruption risk management responses”²⁹ (see the ZTP and health case studies).

²⁹ OECD Development Cooperation Peer Review: Norway 2019 <https://www.oecd.org/dac/oecd-development-co-operation-peer-reviews-norway-2019-75084277-en.htm>

4.3 Anti-Corruption as a Cross-Cutting Issue³⁰

OPERATIONALISING “DO NO HARM”

While 71 % of respondents in the staff survey confirmed that they found Norway's “do no harm” approach to be relevant, it has not been well operationalised. For example, there is widespread recognition within the international community in Somalia that humanitarian assistance has contributed to creating or perpetuating corrupt practices in the country through aid diversion.³¹ In governance, support to AC institutions that may lack transparency and integrity also potentially risks causing harm.

According to the GMA, the “do no harm” approach is intended to be operationalised as part of risk management, covering risk identification, analysis and mitigation. However, only a few examples of this risk-based practice being followed were identified in the desk-

³⁰ This section responds to evaluation questions Q7, “How has Norway's approach to AC as a cross-cutting issue been operationalised?” and Q11, “Has Norway's approach to AC as a cross-cutting issue led to - unexpected or expected - results in fighting corruption in Norway's partner countries?”.

³¹ The Somalia case study gives the example of “designer Internally displaced people, whereby the local population, including farmers, disguise themselves as IDPs to gain better access to food and services.



based study, the staff survey, and the Somalia and Health case studies.

In Indonesia, NICFI is the exception. According to the case study on Climate & Forestry, the “do no harm” approach has become a substantive and explicit part of its risk assessment since 2018, and partners are asked to demonstrate how the design of their programmes will avoid causing any harm.

Elsewhere, the risk-based approach to “do no harm” has not worked well due to low staff capacity, lack of guidance and an overall limited understanding of how to implement it in practice. As put by one respondent in the staff survey: “AC as a cross-cutting issue is not easily understood and severely under-communicated in training and guidance documents for staff as well as partners and applicants”. 62 % of respondents could not think of good examples of projects that followed a “do no harm” approach.

The Somalia and Climate & Forestry case studies also confirm that partners first and foremost consider corruption to be an external risk that they have little control over, and which may have a negative effect on results.

OPERATIONALISING “DOING GOOD”

In the staff survey, 68 % of respondents consider that their projects, while not having AC as their primary objective, do include some relevant AC elements³². The desk-based review and Somalia case study confirm the presence of “doing good” elements in the governance sector (PFM in particular) and in sectors covered by the knowledge bank (Oil for Development, fisheries and forestry). Examples are given in Box 5.

³² These findings uses a broad definition of AC to include efforts made to promote accountability, transparency and integrity. As a result, its main conclusions differ from the MFA internal assesment carried in 2015, which could not find successful examples of projects with doing good AC (stricto sensu) elements.



BOX 5: ILLUSTRATIVE EXAMPLES OF “DOING GOOD” ELEMENTS IN NORWEGIAN DEVELOPMENT COOPERATION³³

- Within PFM, Norway has supported relevant checks-and-balances institutions. In Somalia, for example, Phase 2 (2016-2018) included an integrity component, which sought to strengthen key integrity pillars to hold the government accountable for the use of public funds, namely the Office of the Auditor General (OAG) and the Public Account Committee.
- Also in Somalia, Norwegian support under the UN Multi-Partner Trust Fund, the Joint Programme for Local Governance (phase 1 and 2) – under Outcome 2: Local governments have the capacity to deliver equitable and

³³ Other examples reported in the survey would require the team further access to Norad's database, as only reported using contract/decision numbers.

sustainable services, promote economic development and peace – aims to promote local government accountability and transparency, notably through strengthening community consultation and their engagement in planning and budgeting processes.

- In Oil for Development, the third main objective is to enhance transparency and accountability.
- Within the forestry sector in Indonesia and elsewhere, some NICFI interventions included specific components on the promotion of transparency, accountability and integrity, while focusing more broadly on sustainable land management and environmental protection.³⁴

³⁴ These interventions were listed as: Accelerating Low Emissions Development in Indonesia through Sustainable Land Use Management and Improved Forest Governance, Strengthening Indonesian Forest Monitoring for Climate Actions, BRG-Result Enabling Facilities, East Indonesia Forest Facilities, Enhancement of Human Right and environmental protection in training and policy in the judicial process in Indonesia (source: survey).

Other examples were given for natural resource management and fisheries in Myanmar.

- Within the health sector, a project originating from the World Health Organisation (WHO), the Global Fund and UNDP, among others, has recently been initiated to establish a Global Network of those engaged in Anti-Corruption, Transparency and Accountability across the health sector. WHO building blocks – which are used to support health in most priority countries – include relevant entry points to AC, such as support for better access to data, transparent public finance and procurement systems, and citizens' engagement and community monitoring.



These examples show that AC has been mainstreamed as a cross-cutting issue in many of Norway's programmes and projects. The level of ambition, however, has varied greatly from one project to another, from activities to (sometimes measured) outcomes.

CONCLUSIONS

Based on the findings above, the main conclusions drawn from the desk-based review, the survey and the Somalia and Climate & Forestry case studies are as follows:

Norway has failed to operationalise the "do no harm" approach to AC, as it is currently defined in the GMA. NGOs and donors alike have long committed to following the principle of "do no harm" when dealing with humanitarian assistance and/or operating in fragile states; yet, it is widely acknowledged by leading organisations that "do no harm" remains poorly defined, both in theory and in practice.³⁵

The Somalia case study, however, confirms the importance of following a "do no harm" approach in order to reduce the risk of aid fuelling corrupt practices in the country.

Norway's mainstreaming efforts – specifically consisting

³⁵ <https://www.alnap.org/help-library/incorporating-the-principle-of-%E2%80%9Cdo-no-harm%E2%80%9D-how-to-take-action-without-causing-harm>

of introducing positive AC element in all programmes and projects – have been stopped from 2017, despite good evidence of ongoing practices integrating efforts to promote accountability, transparency and integrity. By contrast, Norway's treatment of gender is guided by the Norwegian Government's Action Plan for Women's Rights and Gender Equality, which focusses on five thematic priority areas.³⁶ As concluded in the Climate & Forestry and Somalia case studies, AC as a cross-cutting issue can be dealt with in a more integrated and holistic manner: for example, The NICFI team in Indonesia has thoroughly integrated thinking about corruption issues and AC mechanisms into its strategy and portfolio of programmes for preventing deforestation.

4.4 Anti-Corruption as a Distinct Component

The Relevance, Effectiveness and Sustainability of Anti-Corruption-specific interventions³⁷

³⁶ <https://norad.no/en/front/thematic-areas/democracy-and-good-governance/gender-for-development/>

³⁷ This sub-section responds to the evaluation question Q9, "How relevant, effective and sustainable have Norway's AC specific programmes and projects (including those related to the global agenda) been in fighting corruption levels in Norway's partner countries?". The relevance and effectiveness of Norway's global advocacy efforts is discussed under 4.5.

THE GLOBAL FIGHT AGAINST CORRUPTION

The Norwegian MFA's decision to align its development cooperation with the global fight against corruption in recent years is in line with the increasing recognition by the international community that fighting corruption requires stronger international cooperation and standards as well as additional support to developing countries. The sampled AC-specific interventions currently supported by Norad also form a relevant and coherent whole that reflects the Norwegian government's commitment to UNCAC, broader participation of civil society organisations (CSOs) and inter-agency cooperation on prosecution and asset recovery.

The combined choice of UNODC (and indirectly the World Bank), the UNCAC Coalition, the Basel Institute and the CHN as delivery partners is also sound, given their global reach and mandate. Like UNODC, the Stolen Asset Recovery Initiative (StAR) and ICAR serve the dual purpose of strengthening country compliance with international norms and standards and providing technical assistance to countries in need. Through its informal network of top-level investigators and prosecutors, the CHN provides a useful alternative to mutual legal assistance, which is often constrained by mistrust between law enforcement institutions. However, recent evaluations have noted some potential gaps, notably the lack



of focus on tax havens by StAR³⁸ and the need for more comprehensive needs assessments by ICAR.³⁹

It is too early to specifically assess the effectiveness of Norwegian support to these initiatives, but the organisations are generally found to perform well in terms of fulfilling their mandates. Good results have notably been achieved in supporting inter-agency investigation, prosecution and asset recovery. The CHN was said to have contributed to improved investigation and prosecution of some of the grandest corruption cases from the last 10 years.⁴⁰ According to a recent external review, StAR's engagement with partner countries has facilitated asset recovery through knowledge building, policy dialogue and mediation. In Somalia, before the Norwegian support resumed, StAR had helped the Central Bank recover USD 1.3 million worth of assets held overseas (a relatively small sum) and assisted in drafting an asset recovery strategy. ICAR has also been able to influence cases to the point where assets located

in foreign jurisdictions have been confiscated and are ready to be repatriated.⁴¹

While it is also too early to assess the effectiveness of Norwegian support to UNODC, a recent impact review⁴² concludes that the UNCAC Review Mechanism has been effective in identifying the main gaps and weaknesses in partner countries' legal, institutional and policy framework(s), and in encouraging countries to implement reforms and build institutions that meet UNCAC requirements. A recent evaluation of the UNODC's Global Regime Against Corruption programme, which is part of Norway's support, confirms the programme's contribution to reinforcing the legitimacy of the AC agenda in partner countries. With the support of the UNCAC Coalition, CSOs were only able to participate in a few UNCAC peer-to-peer reviews; more is needed for CSOs to monitor and influence the UNCAC review mechanism.

The evaluation concludes that despite good performance overall, more needs to be done on all fronts to

ensure visible and sustainable results. The country-level support provided by StAR, for example, is ad hoc and not usually aimed at supporting the entire value chain of accountability institutions. The UNODC does follow a holistic approach, but the funds provided by HQ may be too limited to institute long-term sustainable change. Finally, the CHN cannot be sustained without Norad acting as a secretariat and convener.

PREVENTING DEFORESTATION IN INDONESIA

Norway has improved its contribution to reducing deforestation in Indonesia by selective and sustained investment in relevant AC-specific projects. This support has been relevant in tackling some of the key corruption issues characterizing the forestry sector. It has also been relatively comprehensive, including both preventive and punitive actions, from promoting public participation and transparency to strengthening law enforcement. Furthermore, the use of results-based financing and partnership agreements – as highlighted in the Letter of Intent between the two countries in 2010 – has also been key in ensuring strong country ownership and ultimately sustainability.

The key achievements have been as follows:

- Norway supported the Ministry of Environment and Forests' law enforcement unit, which is headed by

38 External review of StAR, August 2019.

39 SAFE "External Review of ICAR" Draft Final Report January 22, 2020.

40 This includes the OPL 245 case currently before the court in Italy; the ongoing Petrobras case in Brazil; the Alstrom case in Brazil; the Zuma case in South Africa; and the Siemens case.

41 SAFE "External Review of ICAR" Draft Final January 22.

42 Review of the implementation of the United Nations Convention against Corruption "Good practices and experiences of, and relevant measures taken by, States parties after the completion of the country reviews, including information related to technical assistance" Eighth session Abu Dhabi, 16-20 December 2019.



a top-level civil servant. With Norway's support, the unit has carried out 1,180 field operations to date, leading to 1,098 administrative sanctions, 26 civil cases and 748 criminal cases, and assisted 181 police operations.

- Norway also supported the UNODC to provide training on law enforcement, investigations and prosecution to Indonesian officers. Centred on the four provinces with the most remaining forest cover, the programme has a specific focus on AC, including assessments of corruption, the way license operations are conducted, and the way supervision of the license proceeds. However, the Climate & Forestry case study considers that the project remains too small to have a substantive effect.
- Norway also supports a wide range of NGOs working on issues relevant for AC – such as clarifying data and boundaries, which is key to reduce corruption, and supporting the rights and participation of indigenous populations through coalition building – and other NGOs such as AURIGA and WALHI that are supplementing the very modest capability of official law enforcement by taking civil society action to expose illegal deforestation.

Reflecting NICFI's success, the major drop in forest loss in 2017 led Norway to announce its first payment to Indonesia under the results-based financing in 2019, though the payment has not yet been made at the time of finalising this report.

SUPPORTING PUBLIC FINANCE MANAGEMENT REFORMS IN SOMALIA

Norway sees its support to Public Finance Management (PFM) reforms in Somalia as its main entry point to the fight against corruption in the country. In recent years, Norway's support – through the World Bank Multi-Partner Fund and support to the OAG – has increasingly focused on promoting public finance transparency and accountability, which is regarded as central not only to fighting corruption but also to strengthening government legitimacy.

Norway's support has been closely aligned to Somalia's government priorities. Its main (direct and indirect) contribution has been to the OAG, which reached a milestone in 2019 when it published its first audits of the financial statements of the federal government of Somalia.⁴³ These audits also received extensive press coverage.

⁴³ <https://oag.gov.so/audit-reports/>

Over the review period, PFM in federal Somalia has been strengthened, albeit from a low point of departure; however, the pace of PFM reforms has remained slow overall. It took more than five years for the OAG to publish its first audit report of federal government finances. The Somalia case study concludes that sustained and concerted efforts will be needed from authorities as well as donors to make lasting positive changes in relation to the PFM and AC agenda.

DIALOGUE AS A DISTINCT ANTI-CORRUPTION COMPONENT⁴⁴

Access to government typically varies from one country to another. Political dialogue (involving ambassadors) remains relatively ad hoc and poorly documented, while policy dialogue (involving development councillors) appears to be more frequent, in particular at the technical level, where issues related to grant management and/or elements of development cooperation dealing with AC, accountability or transparency are discussed.

In Somalia, Norway has direct access to several top government officials, including the Prime Minister. Its

⁴⁴ This section responds to the evaluation question Q4, "How has Norway effectively used dialogue to support AC in partner countries?". It also looks at donor coordination – a question of relevance to all themes.



dialogue with the government has been regular and high-level, through both bilateral and multilateral channels. Instances of genuine dialogue between the government and the development community on corruption issues have remained limited, however, with most related discussions taking place at a technical level and focusing on indirect AC actions (such as support to PFM).

In Indonesia, Norway regularly discusses AC-related issues as part of its bilateral partnership agreement on deforestation. Norway has also used multilateral agencies to help with the dialogue, currently UNODC and the UN Office for Project Services. The Climate & Forestry case study also noted the joint efforts to include Indonesian civil society into this dialogue from the original Letter of Intent: both countries agreed to give all relevant stakeholders, including indigenous people, local communities and civil society, the opportunity to participate fully and effectively, and to be fully transparent regarding financing, actions and results.

In the health sector, Norway was perceived by some as “punching below its weight” on AC matters, despite good access to Gavi, WHO and the Global Fund. As a result, AC was found to be a marginal topic in comparison with Norway's priorities for health assistance, with no common approach by Norad and the MFA.

CONCLUSIONS

In conclusion, the Somalia, Climate & Forestry and global case studies show that Norway has overall been at the forefront of supporting AC efforts, not just directly on the global front, but also in selected sectors. While selected interventions have been assessed to be highly relevant and broadly effective, the case studies share concerns over the limited scale of the interventions and whether the support (including through joint donor mechanisms) is leading to lasting results. Finally, the three case studies all highlight the importance of promoting public participation as part of AC efforts. In many countries, corruption remains a sensitive subject to discuss directly with the government, but Norway has been able to promote a more inclusive dialogue involving CSOs, which is a relevant and important entry point to AC.

4.5 Strengthening International Norms and Standards Against Corruption⁴⁵

Norway has played an active role in promoting international norms on Illicit Financial Flows (IFF) and grand corruption – two issues of high relevance to developing countries.⁴⁶

Norway's work on fighting IFF has been part of its development assistance since the launch of its White Paper on climate, conflict and capital in 2009.⁴⁷ After some years of reduced engagement under the centre-right government, Norway resumed its advocacy on IFF in 2016, when it partnered with Nigeria to ask that IFF

45 This section responds to the evaluation question Q10, “How relevant, effective and sustainable has Norway's contribution to strengthening international norms and standards against corruption been in the context of the development cooperation agenda?”.

46 Recent estimates indicate that IFFs likely accounted for between about 14.1 percent and 24.0 percent of total developing country trade over the period between 2005 and 2014 https://www.gfintegrity.org/wp-content/uploads/2017/05/GFI-IFF-Report-2017_final.pdf

47 In 2008, a public inquiry, ‘The Commission on Capital Flight from Developing Countries’, was appointed by the Norwegian Government to investigate the functioning of secrecy jurisdictions in relation to capital flight from developing countries.



be discussed at the UN General Assembly.⁴⁸ In spite of hard opposition, they succeeded in getting a short resolution adopted by consensus. The content was mainly a compilation of already agreed measures, but it meant that IFF had a place on the agenda of the General Assembly. In 2017, Norway and the G77 group headed by Nigeria managed to get a much more substantial resolution adopted that, for the first time in a General Assembly resolution, highlighted not only tax evasion but also tax avoidance.⁴⁹ Since then, Norway has continued to promote the IFF agenda, including through the Nordic Baltic Constituency⁵⁰, notably by calling the World Bank to integrate the fight against IFF more fully in its support to partner countries.⁵¹

48 The assessment is based on Interviews with MFA, Norad, UN staff and NGOs.

49 The definition of IFF is contested. The discussion among [other issues] evolves around whether tax avoidance should be included in the definition or whether one should stick to tax evasion only. Tax evasion is illegal, whereas tax avoidance is the process of avoiding tax by taking advantage of loopholes to reduce or avoid tax obligations and is therefore not [necessarily] illegal.

50 Interviews with Norad, MFA staff, Nordic Baltic Constituency Office.

51 See non-paper on Domestic Resource Mobilization and Illicit Financial Flows within the IDA-19 Governance Special Theme.

BOX 6: NORWAY'S SUPPORT TO CIVIL SOCIETY ORGANISATIONS ADVOCACY ON ILLICIT FINANCIAL FLOWS AND GRAND CORRUPTION

Norway has actively promoted the participation of CSOs in UNCAC, despite opposition from less democratic regimes. Norway already fought hard for their participation during the negotiation of the Marrakech resolution in 2009. To support Resolution 7/2, Norway took the initiative to bring CSOs and governments together to discuss issues related to grand corruption, treating CSOs as equal partners. On IFF, the Norwegian Government's long-term and continuous support to CSOs has helped to build both broad coalitions (involving partners from the global south) and a much-needed body of evidence. Importantly, its partnership with CSOs allowed Norway to continue its work on IFF, even though it was discontinued as a government priority in 2013-2016. Norad is also providing support to the UNCAC Coalition, as already discussed under 4.3.

Norway has been instrumental in elevating the issue of grand corruption onto the UN international agenda. At the 7th UNCAC Conference of States Parties (CoSP) in 2017, Norway, Peru and Chile pushed for a resolution on preventing and combatting grand corruption, ten years after it was first tabled by Peru. The resolution first received strong opposition from a group of countries headed by Russia, China, Egypt, Iran, Brazil and the US. The resolution was finally passed, after the reference to grand corruption was replaced by "corruption involving vast quantities of assets" as defined in the preamble of UNCAC, and Norway co-opted more countries. Through its support to the UNODC project, Norway followed up on the agenda by facilitating three expert group meetings in Peru in 2018 and in Prague and Oslo in 2019.⁵² Resolution 7/2 on Vast Quantities of Assets has since become a reference at the 8th and 9th UNCAC CoSPs.⁵³

52 <https://www.unodc.org/unodc/en/corruption/meetings/oslo-egm-2019.html>
<https://www.unodc.org/unodc/en/corruption/meetings/Lima-egm-2018.html>
<https://www.unodc.org/unodc/en/corruption/meetings/prague-egm-2019.html>

53 UNODC "Prevention and combatting corruption involving vast quantities of assets" 2019



In both cases, the global case study explains that behind-the-scene diplomacy played an important role in fighting opposition and co-opting allies. Norway also made good use of the OECD DAC technical working groups, its CHN network and the U4 steering group to kick-start the discussion well before the plenaries. CSOs were also actively involved behind the scenes (see Box 6). Finally, Norway also owes its success to the dedicated work of small teams in the MFA and Norad as well as the diplomatic skills and team efforts displayed by the Norwegian Embassy in Vienna (where the UNODC is based).

CONCLUSIONS

In conclusion, Norway's efforts to promote international norms and standards on IFF and grand corruption have led to some important victories, despite strong opposition. Norway was able to draw from its development cooperation to support its efforts (see 4.5). This success demonstrates Norway's comparative advantage as a small and neutral country in negotiating between opposing parties.

Pushing the agenda forward – and expecting real actions beyond the passing of resolutions – will remain a challenge. IFF and grand corruption are difficult topics that are likely to continue to face strong resistance from both developed and developing countries at the UN assemblies. As such, the Norwegian efforts are only likely to be

sustained if they are continuously followed up through advocacy and development work.

The evaluation notes that the role of the private sector – as a potential ally to AC rather than a perpetrator of corruption – may have been overlooked. This was already mentioned in the evaluation of Norway's support to advocacy from 2016.⁵⁴ Currently, the MFA national platform for AC coordination does not include any representatives from the private sector, and there are no AC interventions that involve the private sector.

4.6 Flexibility, Learning and Other Organisational Issues⁵⁵

Over the review period, MFA and Norad staff have had good access to tailored training and knowledge through U4 and the Norad AC unit.⁵⁶ Nonetheless, the evaluation

⁵⁴ Norad "Evaluation of Norway's support for advocacy in the development policy arena" 2016.

⁵⁵ This section answers the evaluation question Q8, "Has Norway's approach to AC benefited from sufficient resources, been flexible and conducive to learning?". It also looks at the issue of coordination between the Norwegian MFA and Norad.

⁵⁶ The Norwegian MFA/Norad has on occasion turned to U4 to develop practical guidelines for staff or to hold training workshops at Embassies. Norad's AC unit has produced a number of thematic reviews aimed at learning at Embassies.

found little evidence of more systematic, organisational learning on AC issues overall, with the exception of mandatory training on grant management and the ZTP.⁵⁷ The lack of results-based management and a shared knowledge management platform between Norad and the MFA⁵⁸ has further reduced opportunities for learning on AC. As a result, despite some limited attempts, learning on AC has mostly been left to individuals, with U4 often being cited as a useful source to draw from.⁵⁹

In terms of staffing, the evaluation was impressed by the high level of competency of many individuals working both in Oslo and at the Embassies, who understood the complexity of dealing with AC, drawing from their field experience. However, the importance given to AC seems to vary greatly from one sector to another, and the lack of dedicated AC expertise in the MFA/Norad (outside the ZTP and Norad's AC policy unit, one person in the MFA) was noted as a concern by the evaluation.

⁵⁷ While 60 % of Oslo staff also considered that they had received sufficient training (mostly citing ZTP), this percentage fell to 40% when asked to Embassy staff.

⁵⁸ The last years Norad has no longer had access to the MFA intranet nor has MFA or embassies access to Norad's intranet, which makes the sharing of information more challenging.

⁵⁹ 40-45 % of respondents (Oslo and Embassies) also considered that Norway's approach to AC had benefited from knowledge generation and lessons learnt across MFA over the years, although 30% responded they did not know.



Finally, the organisational setting – and notably the division of roles and responsibility between the MFA and Norad – has perhaps made it more difficult, if not onerous, to maintain a consistent approach across all four AC categories. This does not mean that the MFA and Norad teams involved in AC have not worked well together. For example, on ZTP, FIU and FSCU consider that their collaboration has been in line with their respective lines of responsibilities, and as such, has been constructive and cost-effective. Good inter-personal relationships have also allowed good coordination between and within the MFA and Norad on pushing the global advocacy agenda.

CONCLUSIONS

The main conclusion is that the absence of explicit AC strategies at sector, country and global levels – which would draw from in-depth and regular analysis of corruption and ensuing political economy issues – has reduced Norway's capacity to learn, innovate and adapt its AC efforts. At the same time, the evaluation finds some good examples of Norway working flexibly to reflect the context and match changing country circumstances, as shown in Indonesia (see Box 7).

BOX 7: THE PROBLEM-DRIVEN ITERATIVE ADAPTATION IN INDONESIA

Problem-Driven Iterative Adaptation (PDIA) –

Norway in Indonesia: The NICFI team has adapted its portfolio in response to problems that arise and opportunities that present themselves. This applies as much to AC-related activities as to forest and peatland management activities:

Breaking down and sharing the problems: Norway periodically brings groups of their Indonesian partners into a single meeting and asks that they share their challenges so that the best partner may be used for the task, regardless of the formal arrangements. The NICFI Indonesia team also have close links to and strong support from the NICFI leadership team in KLD in Oslo. It was clear from the interviews that Oslo and Jakarta were operating as “one team”.

Identifying and following opportunities: Norway's increased emphasis on strengthening law enforcement to find, investigate and prosecute forest

crimes is a notable example of this, following the appointment of a highly active Director General of Law Enforcement.

Politically astute adaptation: The NICFI team meets with their partners every few weeks, not about project tracking or management, but for a discussion of current social trends and politics. This way, they have their own rolling political economy analysis.

Humility: Many interviewees commended Norway for being humble and energetic, but also aligned with Indonesian sensibilities; routinely asking for the input of their partners and offering the assistance that the partner felt they needed.



Conclusions and Recommendations

5.1 Conclusions⁶⁰

The set of policies and measures characterising Norway's anti-corruption (AC) efforts as part of its development assistance and policy has shown both strengths and weaknesses.

On one hand, Norway has shown a strong commitment to AC globally and in partner countries. It has supported a broad range of programmes and projects with distinct AC components in selected sectors.⁶¹ It has maintained a strong partnership with research and advocacy Civil Society Organisations (CSOs), both at home and overseas. Already known and appreciated for its Corruption Hunter Network (CHN) initiative, it has recently increased its aid support to leading global AC initiatives, including on asset recovery. It has also actively and successfully pushed for strengthened commitment to

international norms and standards on Illicit Financial Flows (IFF) and grand corruption. Finally, it has shown strong commitment to maintaining the Zero-Tolerance Policy (ZTP) on aid misuse, notably by renegotiating its contractual arrangements with multilaterals and agreeing to slightly relax its repayment rule with NGOs. ZTP requirements have been visibly effective in strengthening Non-Governmental Organisations (NGOs) partners' grant management systems over the years.

On the other hand, Norway has not been convincing in its approach to AC as a cross-cutting issue. Despite support from dedicated AC teams in Oslo, the Embassies have not succeeded in articulating their approach to AC in country strategies and have missed opportunities for synergy. Programmes and projects have lacked an evidence-based, results-oriented approach to demonstrate real transformational results, and in some instances the support may have been too sparse or fragmented to become sustainable. Policy and political dialogue on AC-related issues with partner countries has not been well-documented. While largely successful,

global advocacy has been affected by changing political priorities in Norway and will require sustained efforts from the Ministry of Foreign Affairs (MFA), working through multiple UN agencies and international organisations, working groups and events, to secure lasting government commitments.

Finally, the changing aid landscape has made the ZTP's reporting and compliance mechanisms less transparent and comprehensive, as more aid money has been channelled through multilaterals and multi-donor joint funding mechanisms. In addition, more aid money has also been spent in fragile states, where systemic corruption has elevated the risk of aid misuse beyond that of individual grants.

5.2 Recommendations

At the time of finalising this evaluation, the MFA was undertaking in-depth institutional reforms that redefine the roles and responsibilities between the MFA and Norad, leading to a new organisational structure for Norad. It

⁶⁰ This section responds to the conclusion question Q12, "To which extent has Norway's multi-pronged approach to corruption been coherent and more than the sum of its parts?".

⁶¹ This includes measures to promote accountability, transparency and integrity.



is in this context, and based on the main findings and conclusions, that the evaluation provides one overall recommendation and four specific recommendations, with each recommendation making specific reference to *sector* and *fragile states*, when relevant. More detailed recommended actions are available in the five case studies.

[Recommendation 1 \(overall\): Formulate and adopt a comprehensive AC strategy and dedicate more resources to operationalising AC efforts as part of Norway's development policy and assistance across all four categories.](#)

- Norway MFA should adopt an AC strategy, which fully articulates Norway's AC efforts and, with them, its strategic goals, as part of Norway's development policy and assistance.
- New guidelines should be developed for MFA/Norad staff and their delivery partners to ensure a shared understanding of Norway's AC approach and support a more consistent operationalisation of Norway's AC efforts across all grants, sectors and countries (including fragile states) and all four categories.

- The Norwegian MFA and Norad departments at HQ should invest more resources in building AC expertise in their respective sectors and regions, with fragile states receiving special emphasis. Recommended actions include: to establish dedicated AC expertise and/or focal points, to organise more regular training (including through U4) and consultations (including with multilaterals); and to promote learning, including through the use of shared knowledge management platforms.
- Norad and the MFA should develop a more coordinated and systematic approach to learning what works and does not work in relation to AC, notably by introducing a knowledge management platform covering all four AC categories.
- Ministries other than the MFA that have also developed AC competences as part of Norway's development assistance and policy, most notably the Ministry of Climate and Environment (KLD), should be fully associated to future steps taken by the MFA to formulate and adopt an AC strategy and associated guidelines.

In addition to the overall recommendation above, the MFA/Norad should consider the following actions:

[Recommendation 2 \(Zero-Tolerance Policy\): Continue to strengthen the operationalisation of ZTP, making it more uniform and transparent across all aid delivery channels.](#)

- The MFA/Norad should make the part of ZTP dealing with investigations and sanctions more flexible, proportional and system-strengthening focused. When working with NGOs, the MFA should notably consider introducing new ZTP elements to support more differentiation in the response to financial irregularities of different scale and types, which complements punitive measures with incentives for supporting southern partners to strengthen their capacities for financial management and control.
- The Norwegian aid administration needs to put in place an internal mechanism for a more systematic monitoring of cases of aid misuse that are handled by multilateral partners and involve Norwegian money. More than half of Norwegian aid is currently handled by multilaterals, yet Norway MFA, including Embassies, have little visibility on ongoing investigations involving Norway aid money in their partner countries. Akin to cases handled by NGOs, this information should be made public once the investigations are closed.



- The MFA and Norad should continue to invest in in-depth assessments, when working with new partners in partner countries, in particular fragile states, where corruption is often systemic and the risk of aid misuse particularly high.

Recommendation 3 (anti-corruption as a cross-cutting issue): Adopt a more holistic and strategic approach to AC as a cross-cutting issue, and step up efforts towards its operationalisation at grant, sector and country level.

- The MFA's dual approach of combining "do no harm" and integrating positive AC elements in all programmes and projects should be reintroduced using a broader definition of AC (incl. transparency, accountability and integrity) and a stronger focus on reporting results (see recommendation 4).
- Requirements for addressing AC as a cross-cutting issue should be broadened to include not just individual programmes and projects but also all priority sectors and partner countries. This should include setting up measurable AC objectives, based on relevant evidence (including through consultations).

- Norad should work with expert organisations⁶² to help the Norwegian MFA and Norad strengthen the operationalisation of their do no harm approach, with fragile states receiving special emphasis.

Recommendation 4 (anti-corruption as a distinct component): Promote AC efforts in partner countries, by combining support to local and global initiatives and adopting a result-based approach.

- Norway's support to global initiatives should be complemented by in-country support in partner countries. This could involve innovative, low-cost, fast-disbursing, initiatives to support local AC initiatives.
- The MFA should continue to work closely with NGOs on fighting corruption head-on and promoting accountability, transparency and integrity in all sectors and countries, with fragile states receiving special emphasis.
- The MFA, in partnership with other donors, should also work more systematically and visibly

on promoting public finance accountability, transparency and integrity, not only through support to Public Finance Management (PFM) but also as part of their dialogue with governments.

- Norway's AC efforts (as the primary as well as secondary objective) should come with an increased commitment to measuring results at grant, sector and embassy levels.
- The MFA also needs to start looking at more innovative approaches, such as those promoting multi-stakeholder action (involving notably the private sector).

Recommendation 5 (global advocacy, dialogue): Continue to push for a more ambitious global AC advocacy agenda and promote more regular dialogue with partner countries.

- The global advocacy agenda should continue to remain ambitious, not just to focus on IFF and grand corruption, but also on the issue of tax havens. Strategic partnership should also be broadened to include the private sector.
- Embassies should report against their AC efforts

⁶² see for example the work conducted by ALNAP and Collaborative Learning Projects (CDA).



more regularly and comprehensively by capturing both processes (such as dialogue, consultations, diagnosis, and external communication) and results (see previous recommendation).

- The link with the global AC agenda should also be made explicit in the Embassies' AC efforts. More specifically, International norms and standards should feature more explicitly in political dialogue between Norway and governments/non-state actors at the national level than is currently the case.



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Annex 1: Terms of Reference

BACKGROUND AND RATIONALE⁶³

Tackling corruption⁶⁴ has been stated as an important concern for Norway.⁶⁵ In particular, anti-corruption has been explicitly stated as a priority within Norway's overall development policy and assistance.⁶⁶

63 An elaboration of the background and rationale for an evaluation of Norway's anti-corruption efforts has been included in Annex 1, together with an overview of Norway's anti-corruption policy, existing findings from evaluations and other studies about Norway's anti-corruption work, and an overview of funding to these efforts.

64 Corruption is often defined as «abuse of public office for private gain». See e.g. Transparency International, which defines corruption as “misuse of entrusted power for private gain” or the World Bank. Types of corruption include (but are not limited to): Bribery, embezzlement, theft, graft, extortion and patronage.

65 See, for instance, Prime Minister Erna Solberg's opening statement to the OECD Anti-corruption and Integrity Forum in March 2018: <https://www.regjeringen.no/en/aktuelt/planet-integrity-building-a-fairer-society/id2596116/>.

66 See, for instance, Prop. 1 S (2018-2019) p. 16. https://www.regjeringen.no/contentassets/c910991af9c0483db9edc50fca4b9049/no/pdfs/prp201820190001_udddpdfs.pdf. See also «Nulltoleranse for korrupsjon. Utdyping av innholdet i politikken»: https://www.regjeringen.no/globalassets/upload/UD/Vedlegg/nulltoleranse_misligheter.pdf and Meld. St. 17 (2017-2018) Partnerland i utviklingspolitikken: <https://www.regjeringen.no/contentassets/27904d78906b440797c39e032bb69566/no/pdfs/stm201720180017000dddpdfs.pdf>.

Norway's anti-corruption efforts may be subdivided into *four categories*:

(1) upholding *the principle of zero tolerance for corruption in Norwegian development assistance*, compliance to which is subject to control by, among others, the Central Control Unit in the Ministry of Foreign Affairs (MFA) and Norad's Fraud and Integrity Unit;

(2) anti-corruption as a *cross-cutting concern*, seeking to avoid corruption resulting from Norwegian development assistance. The emphasis here is on *risk analysis and risk management*.

(3) anti-corruption as a *distinct component of Norway's development assistance*, both through programmes/projects and through partner dialogue;

(4) *strengthening international norms and standards*⁶⁷ against corruption, including prevention of illicit financial flows and money-laundering.

67 Notably including the UN Convention Against Corruption (UNCAC), UN resolution 7/2 on the prevention and abolition of corruption involving large quantities of assets, and other relevant documents.

Annex 1b Background note to the Terms of Reference shows a table of Norway's financial allocations to governance and anti-corruption as part of its development policy and assistance. However, it is difficult to identify how much of this support goes towards preventing and reducing corruption, and how much of it is allocated to other (governance) issues that are not primarily about corruption. It is therefore hard to unequivocally determine the extent of Norway's anti-corruption efforts based on its financial allocations.⁶⁸

PURPOSE OF THE EVALUATION

The purpose of this evaluation is to contribute to strengthening Norway's anti-corruption efforts as part of its development policy and assistance. The evaluation shall also contribute to enhanced learning about such efforts for other actors seeking to strengthen their anti-corruption efforts.

TARGET GROUP

The main target group for the evaluation includes personnel in the Ministry of Foreign Affairs (MFA) and

68 For instance, post 151-11 Public finance management, while clearly relevant to anti-corruption, is also important in other respects. Similarly, post 151-12 Decentralisation and support to subnational government is both important to anti-corruption efforts and relevant to broader questions about governance (See table in Annex I p. 6).



Norad responsible for Norway's development-related anti-corruption work, including the MFA's Department for Economic Relations and Development, Norad's Department for Economic Development, Gender and Governance, embassy personnel with specific responsibilities related to anti-corruption, and personnel at the U4 Anti-corruption Resource Centre.⁶⁹ The report should also be of interest to other actors in Norway and abroad that work to strengthen anti-corruption as part of the broader development agenda.

OBJECTIVES OF THE EVALUATION

The objectives of the evaluation are to:

- a. Map Norway's anti-corruption initiatives as part of Norway's development policy and assistance.
- b. Assess the *relevance, effectiveness and sustainability* of Norway's anti-corruption efforts as part of its development policy and assistance.
- c. Present *key findings and lessons* based on the available evidence.
- d. Recommend improvements to Norway's an-

⁶⁹ The evaluation shall not consider funds allocated to Norfund or Norec (formerly Fredskorpset).

ti-corruption efforts as part of its development policy and assistance.

KEY EVALUATION QUESTIONS:

1. What have been the most important initiatives driving Norway's anti-corruption efforts as part of its overall development policy and assistance? What have been Norway's explicit and implicit strategies for reaching stated policy goals on anti-corruption? Which channels, programmes, institutions and partners have been prioritised as part of this work, financially and otherwise?⁷⁰
2. What have been the effects of the zero-tolerance for corruption approach in terms of Norway's development policy and assistance?
 - a. How has the zero-tolerance approach towards corruption been operationalised as part of Norway's development policy and assistance? To what extent has this approach been co-ordinated with that of other donors and development actors?

⁷⁰ Possible objects of study may include UNODC; UNODC and the World Bank's Stolen Assets Recovery (StAR) initiative; the International Centre for Asset Recovery (ICAR); the UNCAC Coalition; Council of Europe's Group of States against Corruption (GRECO); the Financial Action Task Force (FATF); the U4 Anti-corruption Centre; the Corruption Hunters' Network; and others.

- b. How has this operationalisation of the zero-tolerance policy affected Norway's risk tolerance, risk assessment and risk management in its collaboration with partner countries, both in terms of anti-corruption as a cross-cutting concern and in specific anti-corruption initiatives?
- c. To what extent has Norway's anti-corruption approach prioritised prevention of as well as response to corruption?

3. How relevant, effective and sustainable have Norway's efforts been in terms of preventing corruption resulting from Norway's thematic and sectoral interventions, i.e., using risk analysis and risk management to ensure anti-corruption as a cross-cutting concern?
4. How relevant, effective and sustainable has Norway's anti-corruption and governance support been in terms of reducing corruption levels in Norway's partner countries, both through programmes/projects and dialogue with governments and other relevant entities?
5. How relevant, effective and sustainable have Norway's efforts been in terms of their contribu-



tion towards strengthening international norms and standards against corruption, including prevention of illicit financial flows and money laundering?⁷¹

6. What, if any, have been the unintended consequences of Norway's policy and practice in this field, positive or negative, direct or indirect? How have these consequences been sought capitalised on, mitigated or resolved?
7. What are the main lessons and areas for improvement concerning Norway's future work on anti-corruption?

SCOPE

The evaluation shall look at Norway's overall anti-corruption policy and practice. In the Inception Report, the team shall consider the need to include broader governance measures as well as specific institutions, entities and instruments of relevance to anti-corruption.

The evaluation shall encompass the *four categories of*

Norway's anti-corruption efforts mentioned in section 1 of these Terms of Reference, i.e.: (1) the principle and operationalisation of the zero-tolerance principle in Norway's development policy and assistance; (2) anti-corruption as a cross-cutting concern, i.e., Norway's use of risk analysis and risk management as tools to ensure Norwegian development assistance does not lead to corruption (Do No Harm); (3) anti-corruption as a distinct component of Norway's development policy and assistance through programmes/projects and through partner dialogue; (4) Norway's contribution towards strengthening international norms and standards against corruption, including prevention of illicit financial flows and money-laundering.

Period of study: 2010 to 2019. The evaluation may draw on older documents where relevant.

METHODOLOGY

The evaluation shall be in accordance with the prevailing OECD DAC Evaluation Quality Standards⁷² and criteria⁷³, as well as relevant guidelines from the Evalu-

ation Department⁷⁴. The evaluation team shall outline a well-formed research strategy and methodology to ensure a transparent and objective assessment of the relevant issues addressed in this evaluation based on the general approach outlined below. A mixed method (qualitative and quantitative) approach is envisaged for this evaluation.

The evaluation team shall make use of primary and secondary data that will be analysed using suitably defined qualitative and quantitative indicators. Primary data shall be collected using document reviews, stakeholder interviews and/or focus groups and may include an online survey to a select number of relevant actors.

A selection of grant recipients (multilaterals, INGOs, country-level partners) will be interviewed about their perception of the relevance, effectiveness and sustainability of Norway's anti-corruption efforts as part of its overall development policy and assistance.

Desk study of Norway's anti-corruption initiatives

As part of their work on the Inception Report, the evaluation team shall undertake a *desk study supplemented by*

71 In line with the UN Convention Against Corruption, and specifically Resolution 7/2 of the Conference of the States Parties to UNCAC regarding corruption involving vast quantities of assets.

72 <https://www.oecd.org/development/evaluation/qualitystandards.pdf>.

73 <http://www.oecd.org/dac/evaluation/dacriteriaforevaluatingdevelopmentassistance.htm>.

74 <https://norad.no/globalassets/filer-2017/evaluating/guidelines-for-the-evaluation-process-and-reports.pdf>.



stakeholder interviews to map Norway's anti-corruption initiatives as part of Norway's development policy and assistance during the specified period. The desk study shall mainly rely on documents in the public domain and those available at the MFA, embassies and Norad archives, as needed, in addition to key international documents of relevance to Norway's anti-corruption efforts. This may encompass various policy documents, strategies and other documents as well as different channels, partners, instruments, programmes and projects.

Also in the Inception Report, and on the basis of the desk study and the interviews, the team shall provide arguments and present suggestions for the selection of three case studies (see below), including specifications for how the team plans to conduct these case studies, and how they are foreseen to contribute to fulfilling the purpose and objectives of this assignment.

Case Studies

Based on the team's findings during the desk study, the team will select and plan for the conduct of three case studies for in-depth study. The type and selection of case studies shall build on the findings during the desk study, and may be in the form of country studies and/or focussing on specific mechanisms, institutions, entities or processes relevant to Norway's anti-corruption

efforts. Together with the desk study and interviews, the case studies shall help the team respond to the purpose of this assignment.

EVALUATION TEAM

The tenderer and the evaluation team shall be assessed based on the competency requirements elaborated under Award criteria in the tender document.

Team members/experts that are to conduct the case studies shall be identified in consultation with the Evaluation department once the final selection of case studies has been made.

ORGANISATION

- a. The Evaluation Department will manage the evaluation. The evaluation team shall report to the Evaluation Department through the team leader. The team leader shall oversee all deliveries and will report regularly to Norad on the team's progress, including any issues that may jeopardise the assignment as well as proposals on how to deal with such issues.
- b. All decisions concerning these Terms of Reference, and all deliverables are subject to the approval of the Evaluation Department.

c. The team is entitled to consult widely with stakeholders pertinent to the assignment. Data collection is the responsibility of the evaluation team. Access to archives will be facilitated by Norad and the stakeholders.

d. The institution delivering the services shall provide quality assurance prior to submission of all deliverables, including ensuring high quality language throughout.

BUDGET AND DELIVERABLES

Budget:

The project is budgeted with a maximum input of 40 consultant weeks (1600 consultant hours). The budget estimate includes the time allocated to any local team members and the time to be used during field visits, debriefings and seminars, including compensation for travel time used in intercontinental travel.

Deliverables:

- Inception Report not exceeding 52 500 signs including spaces (ca. 7 500 words, ca. 15 pages) excluding annexes, to be commented on by stakeholders before final approval by the Evaluation Department



- One work-in-progress seminar in Oslo to report on and receive comments from stakeholders to the preliminary findings of the desk study and to the planned case studies
- Draft Final Report not exceeding 87 500 signs including spaces (ca. 12 500 words, ca. 25 pages) excluding annexes, for preliminary approval by the Evaluation Department before circulation to the stakeholders. The stakeholders shall provide feedback including comments on the report's structure, facts, findings, conclusions and recommendations
- Final Evaluation Report of the same length as the Draft Final Report
- Policy brief not exceeding 7000 signs including spaces (max 2 pages)
- Seminar for dissemination of the final report. Direct travel costs related to dissemination in international fora; if any, these costs will be covered separately based on need, and are not to be included in the budget proposal.

dance with the Evaluation Department's Guidelines) are to be submitted in electronic form in accordance with the deadlines set in the progress plan specified in the tender document.

All data, presentations, reports (to be prepared in accor-



Annex 1 a: Background note to the Terms of Reference

- Background and rationale
- Norwegian anti-corruption policies
- Existing knowledge about Norway's anti-corruption work
- Limited funding of anti-corruption efforts

BACKGROUND AND RATIONALE

Corruption⁷⁵ is a global problem with grand proportions, and a major obstacle to reducing poverty. In his foreword to the United Nations Convention Against Corruption, former United Nations Secretary-General Kofi Annan noted that corruption “is a key element in economic underperformance and a major obstacle to poverty alleviation and development.”⁷⁶

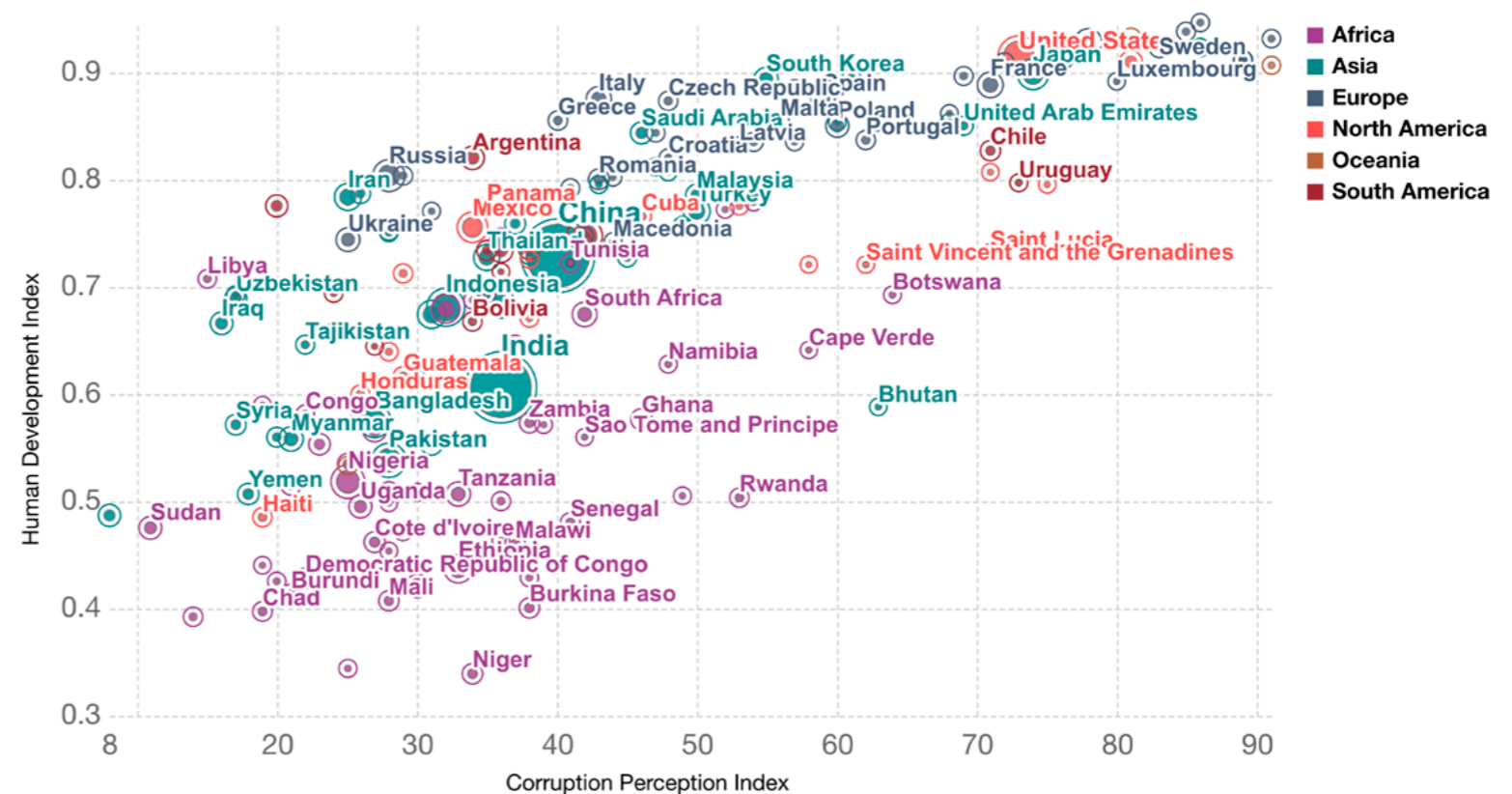
75 Corruption is often defined as «abuse of public office for private gain». See e.g. Transparency International, which defines corruption as “misuse of entrusted power for private gain” or the World Bank. Types of corruption include (but are not limited to): Bribery, embezzlement, theft, graft, extortion and patronage.

76 UNODC: United Nations Convention Against Corruption (UNCAC), 2004: https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf, p. iii.

Figure 1 illustrates the correlation between corruption and human development.

Human Development Index vs. Corruption Perception Index, 2013

The vertical axis shows scores in the UN Human Development Index (lower values reflect lower development). The horizontal axis shows scores in Transparency International's Corruption Perception Index (lower values reflect higher perceived corruption).



Source: UNDP (2018), Transparency International (2018), Population by country, 1800 to 2100 (Gapminder & UN) OurWorldInData.org/corruption/ • CC BY

According to UN Secretary-General Antonio Guterres, the global cost of corruption amounts to USD 2.6 trillion annually, equal to five per cent of global GDP, or 19 times the global Official Development Assistance (ODA) of USD 134.8 billion in 2013. Bribes alone amounted to more than USD 1.0 trillion annually.⁷⁷ Corruption is also a driver of conflict and is linked to such forms of instability as trafficking of arms, guns and people as well as terrorism and violent extremism. The UN General Assembly considered corruption such a large challenge to global development that it made reduction of corruption and bribes one of the targets for the 16th Sustainable Development Goal⁷⁸.

The international community has developed several initiatives to address corruption, including strengthening international and national law⁷⁹ to limit the legal scope for corrupt practices; assisting in building anti-corruption bureaus; enhancing transparency; and improving governance in developing countries. Beyond public

77 <https://www.un.org/press/en/2018/sc13493.doc.htm>.

78 Sustainable Development Goal 16: "promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels".

79 The most comprehensive international convention is the United Nations Convention against Corruption (UNCAC); several regional conventions are also important.

sector actors, a broad anti-corruption strategy typically includes civil society, the media, and the private sector.

ANTI-CORRUPTION APPROACHES IN INTERNATIONAL DEVELOPMENT ASSISTANCE

Corruption poses a serious problem for development assistance. Generally, donors may choose one or several approaches to tackling corruption: First, they seek to safeguard their own money from corruption and other forms of financial mismanagement – i.e., *reducing fiduciary risk*. Second, they want to ensure that the resources they transfer *do not exacerbate corruption* in recipient countries ("Do No Harm"). Third, they may prefer to utilise some part of their financial resources to *help developing countries reduce corruption levels in their societies*. Fourth, they may work to *strengthen international norms against corruption*, including prevention of illicit financial flows and money-laundering. The relative emphasis of each approach varies between countries and over time.

With the realisation that a large and increasing proportion of the poor will live in *fragile contexts* by 2030, anti-corruption work in such contexts has received an increased focus. Fragility exacerbates vulnerability to instability and limits the capacity for reform⁸⁰. States

80 See Jesper Johnsen (2016) "Anti-Corruption Strategies in Fragile States" for a

with high levels of fragility receive a significant part – about 25 percent in 2015 - of total ODA provided by DAC countries⁸¹. OECD DAC's *Principles for engagement in fragile states* are also relevant for anti-corruption strategies and programmes.⁸²

NORWEGIAN ANTI-CORRUPTION POLICIES

The international approach to fighting corruption and the accompanying legal reforms have influenced Norway's thinking on and method for dealing with corruption challenges both in general and in Norway's development assistance.

Policy documents such as [Norad's Good Governance and Anti-Corruption Action Plan 2000-2001](#) and [the national budget for 2007 \(Stortingsproposisjon no 1 2006-2007\)](#) emphasise efforts at reducing corruption in partner countries.⁸³

discussion of the theory and practice.

81 OECD DAC data. See <http://stats.oecd.org/qwids/>.

82 <https://www.alnap.org/help-library/principles-for-good-international-engagement-in-fragile-states-and-situations>

83 "Norge vil med bakgrunn i egne erfaringer med utviklingen av velferdsstaten bidra til å utvikle velfungerende stater og samfunn mindre preget av korrupsjon», Prop. 1 s (2006-2007), p. 12.



Other relevant documents include [St. meld. nr. 35 \(2003-2004\) Felles kamp mot fattigdom](#), [St. meld. nr. 13 \(2008-2009\) Klima, konflikt og kapital](#), [St. meld. nr. 25 \(2012-2013\) Dele for å skape](#), [Meld. st. 10 \(2014-2015\) Muligheter for alle – menneskerettighetene som mål og middel i utenriks- og utviklingspolitikken](#), and [Prop. 1 S \(2018-2019\)](#).

The documents share several themes. They generally place the fight against corruption high on the development agenda, including an ambition to combat grand corruption and money laundering. *Improving governance* is viewed as a central measure, alongside *specific anti-corruption measures* globally and at country level. There is an emphasis on efforts to combat illicit financial flows out of developing countries and the related problem of money laundering, and to identify and return funds formerly illegally transferred out of developing countries.

Oversight institutions such as auditor-generals, parliaments, ombudsman offices and free speech and media are important instruments against corruption, as is a functioning and independent justice system including the police. Other factors include an open administrative system and decent salaries; division of power; a free political opposition; and the quality of the public administrative system.

Establishing and upholding key *norms and standards* constitute an important part of the struggle against corruption. These include the UN Convention Against Corruption (UNCAC) (ratified in 2004)⁸⁴ and conventions under the OECD, the African Union (AU) and the European Union (UN). A more recent, norm-setting document includes *UN Resolution 7/2 on preventing and combating corruption involving “vast quantities of assets”* (otherwise known as grand corruption).⁸⁵

Several *organisations, alliances and partnerships* work to ensure the implementation of the provisions of these and other anti-corruption documents. They are important partners for Norway's anti-corruption work, and include the civil society-based UNCAC Coalition⁸⁶; the Financial Action Task Force on Money Laundering (FATF)⁸⁷; the UN Office against Drugs and Crime (UNODC)⁸⁸; the International Centre for Asset Recovery (ICAR)⁸⁹; the

84 https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.

85 <http://www.unodc.org/unodc/en/corruption/COSP/session7-resolutions.html>.

86 https://uncaccoalition.org/en_US/.

87 <http://www.fatf-gafi.org/>.

88 <http://www.unodc.org/>.

89 <https://www.baselgovernance.org/theme/icar>.

International Organisation of Supreme Audit Institutions (INTOSAI)⁹⁰; and the Extractive Industries Transparency Initiative (EITI)⁹¹. OECD, Interpol, and the Global Financial Integrity (GFI)⁹² are other important partners.

Prop. 1 S (2018-2019) – the Norwegian Government's most recent budget proposal – underlines corruption as one of several risks to the achievement of results in development assistance, not least in countries and regions with high levels of fragility.⁹³ It highlights that the MFA tries to reduce corruption risk through thorough risk assessment procedures, and through systematic follow-up and control of the grants. It emphasises, however, that zero-tolerance for financial irregularities⁹⁴ does not translate into zero-tolerance for risk. It recognises that corruption risk is often higher where the needs are the greatest, such as in fragile states, which

90 <http://www.intosai.org/>.

91 <https://eiti.org/>.

92 <https://www.gfintegrity.org/>.

93 Prop. 1 S (2018-2019) p. 19. https://www.regjeringen.no/contentassets/c910991af9c0483db9edc50fca4b9049/no/pdfs/prp201820190001_udddpdfs.pdf.

94 See «Nulltoleranse for korrupsjon. Utdyping av innholdet i politikken» (see also notes 22-25, below): https://www.regjeringen.no/globalassets/upload/UD/Vedlegg/nulltoleranse_misligheter.pdf.



have been receiving increased funding from Norway in recent years. Indeed, 12 of 16 partner countries for Norwegian development assistance are now considered either vulnerable or extremely vulnerable according to the OECD criteria for vulnerability; five of these are considered extremely vulnerable.⁹⁵

NORWAY'S ZERO-TOLERANCE POLICY

As early as in 2000, Norad established a so-called "zero-tolerance" principle concerning corruption related to Norwegian development assistance, stating that "[Norad's] guiding principle is "zero tolerance" for corruption."⁹⁶ Ten years later, this was reinforced in the MFA's Zero Tolerance document on corruption,⁹⁷ where the Government declares: "The Government has a zero-tolerance policy on corruption in all our own [and our partners'] programmes and projects. Our partner countries must be supported in their efforts to combat corruption. We will also support the anti-corruption

95 See Meld. St. 17 (2017-2018) Partnerland i utviklingspolitikken: <https://www.regjeringen.no/contentassets/27904d78906b440797c39e032bb69566/no/pdfs/stm201720180017000dddpdfs.pdf>.

96 NORAD's Good Governance and Anti-Corruption Action Plan 2000-2001.

97 "The Ministry of Foreign Affairs' zero-tolerance policy on corruption. How can it best be put into practice?", 9 June 2010.

efforts of international organisations."⁹⁸ Thus the main emphasis is on preventing, mitigating and punishing corrupt use of the government's own funds or of partner organisations channeling Norwegian funds to developing countries. The Guidelines on corruption (2011) build on the zero-tolerance document and reinforce this focus.⁹⁹ The Revised Guidelines (2019), as well as detailed instructions on how to interpret and practice them¹⁰⁰, also underline the need to safeguard the Norwegian Government's own development funds.¹⁰¹

98 «Nulltoleranse for korrupsjon. Utdyping av innholdet i politikken», 1 Nov. 2010.

99 Retningslinjer for håndtering av mistanke om økonomiske misligheter, MFA, 18 March 2011. https://www.regjeringen.no/globalassets/upload/ud/vedlegg/varsling_1210.pdf.

100 «Retningslinjer for utenriktjenestens håndtering av mistanke om økonomiske misligheter» 11 December 2018; «Praktisering av nulltoleranse for økonomiske misligheter», 11 December 2018.

101 Following the formulation of the zero-tolerance policy in 2010, the MFA has expanded and refined its Grant Management Manual and supporting documentation, extended its financial and reporting requirements towards recipients of Norwegian development assistance, and established several new units to improve the control function and compliance with financial regulations and policies. Legal agreement templates have been expanded and revised to clarify financial requirements and provide an improved legal basis for handling cases of corruption.

What we know: evaluations and reviews/studies of Norway's anti-corruption work:

A few evaluations and studies exist on Norway's efforts to combat corruption. One study, based on interventions in Nepal and Tanzania, found *too weak incorporation of corruption assessments* in Norway's development assistance. While six of seven projects studied *included corruption risk* as part of their risk assessment, only two included concrete measures to *manage this risk* in their planning documents.¹⁰²

One major evaluation from 2011 identified several challenges concerning the relevance and effectiveness of Norway's work on anti-corruption, including a finding that "*intermediate results [had] not translated into reduced levels of corruption at national levels.*" The authors recommended that Norway in its anti-corruption efforts: (1) Make donor approaches to anti-corruption more explicit, coherent, and evidence-based; (2) invest in evidence-gathering and public dissemination; (3) make good governance and specific anti-corruption interventions more joined-up and risk-aware; (4) take a sectoral approach to anti-corruption, with an emphasis on poverty and gender; (5) stop

102 https://evalueringsportalen.no/evaluering/riksrevisjonens-undersokelse-av-resultatorienteringen-i-norsk-bistand-2/Dokumentbase_3_4_2010_2011.pdf/@@inline.



working with institutions in isolation and start promoting inter-agency partnerships; (6) co-ordinate anti-corruption efforts; (7) use short-term, reaction-driven inputs to reinforce long-term, preventive interventions; and (8) adopt a “do no harm”-approach to aid, acknowledging that aid can perpetuate corrupt practices.¹⁰³

Another study from 2015, looking at overall management as well as selected projects in Afghanistan, Bosnia-Herzegovina, Uganda and Zambia during the 2004-2014 period, criticised Norway's support to good governance and anti-corruption for: its *lack of a separate strategy*, leading to a lack of strategic focus; *weak goal achievement and sustainability; unsatisfactory planning* – including weak context analysis; *weak quality assurance and little or no risk assessment; limited follow-up* of projects and programmes; and a *weak system for evaluating goal achievement*, resulting in reduced learning.¹⁰⁴

¹⁰³ Joint Evaluation of Support to Anti-corruption Efforts 2002-2009 (Norad, 2011) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/213935/evaluation-anti-corruption-efforts2002-2009.pdf.

¹⁰⁴ Study on Norway's support to good governance and anti-corruption in selected partner countries, Norwegian Office of the Auditor General (2015) <https://www.riksrevisjonen.no/globalassets/rapporter/no-2014-2015/bistandtilgodtstyresetogantikorrupsjonitvalgtesamarbeidsland.pdf>.

The Auditor General recommended that the MFA: *consider formulating a strategy* based on key goals for its work on good governance and anti-corruption; *strengthen the knowledge base* for this work in key partner countries, including through political-economic analyses; *improve goal structure, indicators and reporting*; and *create an improved basis for learning* through a structured, systematic and documented assessment of the goal achievement in each project.

In 2016, Norad's Evaluation Department issued an Evaluation into Norway's Engagement in the Fight against Illicit Financial Flows and Tax Havens, including an *Annex on commercial tax evasion*.¹⁰⁵ Internal challenges included *limited resource availability and staying power* (“capacity to make longer-term commitments). External challenges included *weak local ownership*, which limited the ability to build institutional capacity and implement programmes. Also, *complex governance structures* of multilateral agencies and *adverse corporate lobbying*, in addition to the *sheer scale* of the problem, limited the ability to put a brake on illicit financial flows.

¹⁰⁵ <https://evalueringsportalen.no/evaluering/evaluation-of-norway-s-support-for-advocacy-in-the-development-policy-arena/annex-6-case-study-on-norways-engagement-in-the-fight-against-illicit-financial-flows-and-tax-havens-commercial-tax-evasion.pdf/@inline>.

Limited funding of anti-corruption efforts

Generally, funds to fight corruption in Norwegian development assistance have been limited, especially when compared to the overall size of Norway's development assistance.

The below figure shows Norway's funding to anti-corruption measures (including governance) during the 2010-2017 period. Roughly two-thirds of the NOK 31.9 billion provided for governance – NOK 21.8 billion, was provided for OECD DAC sector 115 Government and civil society, general. The overall level of governance funding was about the same at the end of the period as in 2010, having peaked in 2013-2015. Specific support for anti-corruption organisations and institutions constituted NOK 563.9 million, or 1.7 per cent of total governance funding during the period. However, it is difficult to identify how much of Norway's governance support goes towards preventing and reducing corruption, and how much of it is allocated to other (governance) issues that are not primarily about corruption. It is therefore hard to unequivocally determine the extent of Norway's anti-corruption efforts based on its financial allocations.¹⁰⁶

¹⁰⁶ For instance, post 151-11 Public finance management (see table), while clearly relevant to anti-corruption, is also important in other respects. Similarly, post 151-12 Decentralisation and support to subnational government is both



DAC Main sector (code+name)	DAC Sub sector (code+name)	2010	2011	2012	2013	2014	2015	2016	2017	Grand Total	
151 - Government and civil society, general	10 - Public sector policy and administrative management	309 104	200 750	235 664	509 707	143 877	163 053	127 847	141 700	1 831 702	
	11 - Public finance management	140 932	152 685	92 593	183 672	217 646	130 500	121 027	79 121	1 118 177	
	12 - Decentralisation and support to subnational government	44 110	48 629	36 217	46 276	33 730	24 626	44 544	73 763	351 896	
	13 - Anti-corruption organisations and institutions	79 591	82 729	67 678	76 438	83 296	77 340	61 801	35 033	563 906	
	14 - Domestic Revenue Mobilisation	5 000	26 192	48 790	68 327	77 397	131 813	54 664	66 762	478 945	
	30 - Legal and judicial development	279 165	367 963	212 507	222 187	233 251	320 055	240 985	240 058	2 116 172	
	40 - Government administration				-2 372						-2 372
	50 - Democratic participation and civil society	644 850	613 564	643 707	611 314	712 374	687 218	752 614	728 819	5 394 460	
	51 - Elections	65 152	29 320	57 375	147 704	99 276	83 541	29 140	27 072	538 579	
	52 - Legislatures and political parties	32 286	98 729	22 391	42 224	24 222	15 328	8 937	66 832	310 949	
53 - Media and free flow of information	62 474	64 357	94 432	101 675	96 018	98 044	56 682	69 827	643 507		
60 - Human rights	525 978	547 538	612 780	665 045	701 338	643 329	523 251	513 690	4 732 949		
70 - Women's equality organisations and institutions	392 896	439 777	471 449	440 535	462 052	435 225	325 716	336 493	3 304 145		
80 - Ending violence against women and girls			1 500	23 500	33 075	61 892	139 765	170 065	429 797		
151 - Government and civil society, general Total		2 581 539	2 672 232	2 597 084	3 136 232	2 917 552	2 871 966	2 486 974	2 549 234	21 812 812	
152 - Conflict prevention and resolution, peace and security	10 - Security system management and reform	55 223	48 810	66 751	66 247	35 701	51 824	19 394	24 768	368 717	
	20 - Civilian peace-building, conflict prevention and resolution	790 068	768 135	828 897	864 779	828 293	922 030	769 726	876 715	6 648 643	
	30 - Participation in international peacekeeping operations	101 857	111 754	74 732	107 394	169 305	84 882	61 873	57 555	769 352	
	40 - Reintegration and SALW control	78 026	15 724	18 400	13 192	29 794	11 708	4 463	1 775	173 081	
	50 - Removal of land mines and explosive remnants of war	254 806	323 590	282 663	241 320	232 162	172 468	250 866	311 849	2 069 724	
	61 - Child soldiers (Prevention and demobilisation)	12 022	17 969	21 869	7 491	4 676	6 500	157	-457	70 228	
152 - Conflict prevention and resolution, peace and security Total		1 292 003	1 285 982	1 293 312	1 300 423	1 299 930	1 249 412	1 106 479	1 272 205	10 099 745	
Grand Total		3 873 541	3 958 215	3 890 396	4 436 655	4 217 482	4 121 378	3 593 452	3 821 439	31 912 558	

Source: Norad 2018, amounts in 1000 NOK

The MFA's allocation letters to Norad concerning corruption most often refer to the zero-tolerance policy, civil society, and cross-cutting issues including human rights, women's rights and gender equality, climate and the environment and anti-corruption. Specific allocations for anti-corruption measures are rare, at least in terms of the general development policy.

However, in 2019, the MFA transferred NOK 19 million to Norad in support of the anti-corruption agenda¹⁰⁷: helping to ensure global implementation of the UN Convention Against Corruption (UNCAC)¹⁰⁸ and to support implementation of UN Resolution 7/2 on "vast quantities of assets" (otherwise called "grand corruption")¹⁰⁹. Relevant channels and partners for this support included the *United Nations Office on Drugs and Crime (UN-*

ODC), the Stolen Asset Recovery Initiative (StAR)¹¹⁰, the International Centre for Asset Recovery (ICAR)¹¹¹ and "possibly the UNCAC Coalition"¹¹², mainly through a limited number of (preferably) multi-year agreements. These entities have supported Norway's anti-corruption policies for several years, underlining the relevance of studying their rationale, functioning, problems and achievements over time. Ultimately, studying the support to these specific institutions and instruments would be crucial to understanding Norway's support to anti-corruption efforts globally

important to anti-corruption efforts and relevant to broader questions about governance. Similar issues arise for other budget lines.

107 This amount was unused in 2017 (sector not specified) and transferred to 2018. "Norad. Tildelingsbrev nr. 2-2018", p. 5-6.

108 UNODC: United Nations Convention Against Corruption (UNCAC), 2004: https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf

109 Res. 7/2: Preventing and combatting corruption in all its forms more effectively, including, among others, when it involves vast quantities of assets, based on a comprehensive and multidisciplinary approach, in accordance with [UNCAC]. <http://www.unodc.org/documents/treaties/UNCAC/COSP/session7/V1800228e.pdf>

110 <https://star.worldbank.org/>

111 <https://www.baselgovernance.org/theme/icar>

112 https://uncaccoalition.org/en_US/



Annex 2: Final List of Evaluation Questions

The list of evaluation questions covered by this evaluation is provided in Table 1.

Table 1: Final list of evaluation questions

Mapping Norway's AC Efforts	OECD DAC / PDIA Criteria
Q1 What have been Norway's explicit and implicit strategies for preventing and fighting corruption?	Mapping
Q2 What channels, programmes, institutions, partners and countries have been prioritised to drive Norway's AC efforts as part of its overall development policy and assistance?	Mapping
Q3 What have been the most important international initiatives driving Norway's AC efforts as part of its development cooperation and diplomacy?	Mapping
Norway's Ways of Working	
Q4 How has Norway effectively used dialogue to support AC in partner countries?	Relevance, efficiency, effectiveness + flexibility
Q5 How has Norway operationalised its zero-tolerance policy? Has it reduced the risk of aid misuse?	Relevance, efficiency, effectiveness + flexibility
Q6 How has the zero-tolerance policy positively or negatively affected Norway and its delivery partners' risk tolerance and risk management processes?	Relevance, efficiency, effectiveness + flexibility
Q7 How has Norway's approach to AC as a cross-cutting issue been operationalised?	Relevance, efficiency, effectiveness Flexibility
Q8 Has Norway's approach to AC benefited from sufficient resources, been flexible and conducive to learning?	Efficiency + flexibility Learning
Programming and Results	
Q9 How relevant, effective and sustainable have Norway's AC-specific programmes/projects (including those related to the global agenda) been in fighting corruption in partner countries?	Relevance, effectiveness, sustainability
Q10 How relevant, effective and sustainable has Norway's contribution to strengthening international norms and standards against corruption been in the context of the development cooperation agenda?	Relevance, effectiveness, sustainability
Q11 Has Norway's approach to zero tolerance and AC as a cross-cutting issue led to results (unexpected or expected) in fighting corruption in Norway's partner countries?	Effectiveness
Conclusions, Lessons and Recommendations	
Q12 To which extent has Norway's multi-pronged approach to corruption been coherent and more than the sum of its parts?	Conclusions
Q13 What are the main areas for improvement concerning Norway's future work on AC?	Lessons and Recommendations



Annex 3: Theory of Change

The Theory of Change (ToC) reconstructed by the team during the inception shows that Norway's AC strategy comes with a number of (implicit and explicit) assump-

tions and causal links as shown in Figure 1. The ToC articulates Norway's AC efforts around two main objectives: preventing misuse of Norwegian development assistance, and preventing and combating corruption in

partner countries. The Sustainable Development Goals (SDGs) are added as a reference (since their adoption in 2015).

BOX 8: NORWAY'S ANTI-CORRUPTION STRATEGY – THEORY OF CHANGE: CAUSAL LINKS AND ASSUMPTIONS

The Zero-Tolerance Policy:

(Causal link) Stronger grant management leads to reduced risk of aid misuse and allows cases of financial irregularities to be detected, prevented or investigated.

(Causal link) Improved investigation and enforcement lead to corrective actions and, in turn, to stronger grant management systems.

Anti-corruption as a cross-cutting issue:

(Causal link) Through their risk-management approach, delivery partners can identify how their interventions may cause harm and, in so doing, take effective remedial actions.

(Causal link) Stronger grant management will lead to less aid diversion and, in so doing, reduce the risk that delivery

partners may “perpetuate corrupt practices in communities, regions or countries” (“do no harm”).

(Causal link) (until 2017) Introducing some “doing good” elements can have positive effects on AC.

Anti-corruption as a distinct component¹¹³ and global advocacy:

(Assumption) Political will to fight corruption exists globally and in partner countries.

(Causal link) Adopting international norms and standards, strengthening AC policies and institutions, and promoting transparency and participation will lead to more effective, accountable and transparent public institutions (globally

¹¹³ Elements of this ToC can also be found in Norway's relevant sectors and initiatives. These include, for example, the ToC for Oil for Development and that for UNODC Global Anti-Corruption Program - Accelerating UNCAC implementation globally.

and in partner countries), strengthen the rule of law, and increase the success in fighting cases of corruption.

(Assumption) A good governance framework is necessary, but insufficient, for the fight against corruption, which requires complementary actions.¹¹⁴

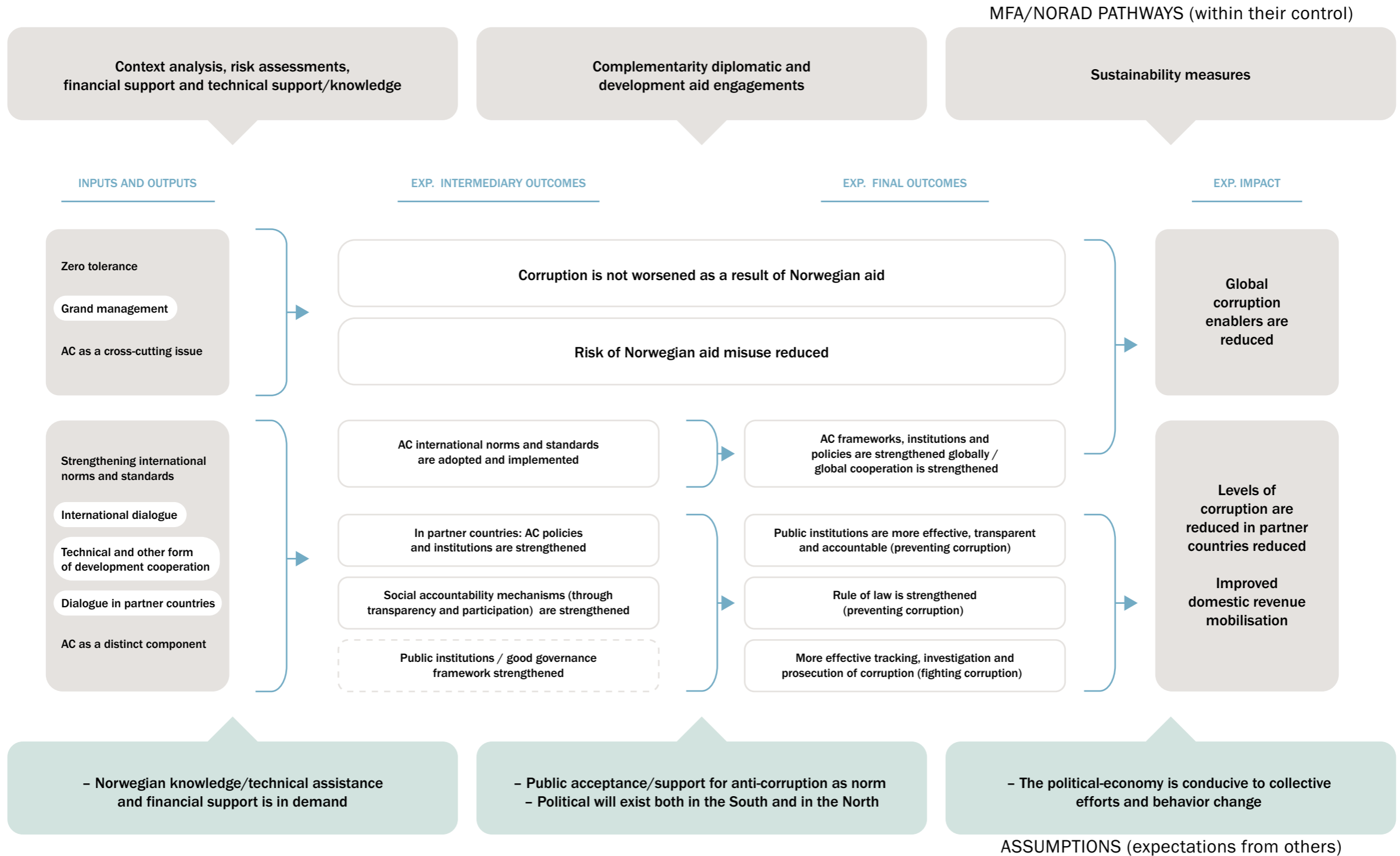
(Causal link) Global advocacy on AC norms and standards will trickle down and improve prevention, investigation and prosecution of corruption at the national level.

(Ways of working) Norway's ways of working ensure that corruption is not worsened as a result of Norwegian development assistance; the risk of Norwegian development assistance misuse will remain reduced; and the choice of partners and complementary diplomatic and development aid engagements will contribute to results.

¹¹⁴ Good governance action plan.

These causal links and assumptions have been reviewed to generate relevant conclusions across the four AC categories.

Figure 1: Norway's Anti-Corruption efforts – overall Theory of Change



Annex 4: List of People Interviewed

List of People Met – General

Ane Broch Graver, Enviro/Climate Ministry

Arvinn Eikeland Gadgil, Policy Director, MFA

Astri Toril Bente Herstad, Policy Director, Norad Head
of Department for Climate, Energy and Environments;
Section for Climate, Forest and Green Economy

Beate Bull, Senior Advisor, Knowledge Bank, Norad

Berit Fladby, Policy Director, MFA

Betzy Marie Ellingsen Tunold, Policy Director (SDG 16,
incl. Anti-corruption), Section for Development Policy,
MFA.

Dag Nenningsland, Senior Advisor, Fraud and Integrity
Unit, Norad

Danielle Naranjilla, Head of Partnerships, World Food
Programme

David Robinson, Anti-corruption advisor, UNODC Kenya

DG Mohammed, Somali Federal Ministry of Justice and
Judiciary Affairs

DG Souleymane, Financial Governance Committee
(FGC), Somalia Ministry of Finance

Esben Kyhring, Senior Public Prosecutor, ØKOKRIM/
Financial Intelligence Unit

Faisal Ahmed, Financial Governance Committee (FCG),
Somali Ministry of Finance

Fredrikke Storaker Kilander, Section Head, Section for
Civil Society, Education, Health and Coordination of
Comprehensive Agreements, Civil Society Department,
Norad

Gro Lindvik Robstad, acting CFO, Strømme Foundation,
and co-chair NGO anti-corruption working group

Gro Skaaren-Fystro, Special Advisor, Transparency
International Norway

Harald Mathisen, Senior Adviser, Norad

Hamza, Somalia Central Bank

Henrik Lunden, Senior Advisor, Section for Grant
Management, MFA

Jan-Petter Holtedahl, Senior Advisor, Evaluation
Department, Norad

Jama Yassin, Nordic International Support Foundation

Katrine Andrea Heggedal, Assistant Director, Statistics
Section

Kjersti Lindøe, Oil for Development

Kjell-Kristian Dørum, Ethics Council/Norwegian Pension
Fund

Knut Nyfløt, Assistant Director, Section for Civil Society,
Human Rights and Democracy

Kåre Eriksen, Senior Advisor, Digni (an umbrella
organisation for religious organisations doing
international development) and Chair of NGO anti-
corruption working group

Lars Andreas Lunde, Policy Director, Norad Head of
Department for Climate, Energy and Environment;
Section for Climate, Forest and Green Economy



Lene Jeanette Lothe, Policy Director, Norad Department for Education and Global Health, Global Health section

Liban Obsiye, The Policy Coordinator at the Office of the Finance Minister in Somalia, Financial Governance Committee (FCG), Somalia Ministry of Finance

Lise Stensrud, Policy Director, Section for Knowledge Programmes, Knowledge Bank, Norad

Louis Oliver, Head of Governance Team, EU Delegation

Marianne Loe, MFA

Marit Marie Strand, Senior Adviser, Department for Economic Development, Gender and Governance; Section for Development Strategy and Economic Governance, Norad

Marte Briseid, Senior Advisor, Knowledge Bank

Martin Larnemark, Assistant Director, Department for Quality Assurance, Results Management Section

Merete Fjeld Brattested, Director General, Department for UN and Humanitarian Affairs; Section for UN policy

Matija Kovač, UNOCHA, Mogadishu Mr.

Mohamed, Auditor General in Somalia

Nils Haugstveit, former Inspector General (Kontrolldirektør), Foreign Service Control Unit, MFA

Raqiya Ahmed Ga'al, Nordic International Support Foundation

Rotwitt, Narve Nub Kveseth, Civil Society division, Norad

Signe Marie Brevik, Norad research section - health research

Svend Thorleif Skjønberg, Senior adviser, head of Fraud and Integrity Unit (Varslingsenheten), Norad

Tale Kvalvaag, Department Director, Knowledge Bank, Norad

Torgeir Fyhri, Assistant Director, Section for Grant Management, MFA

Thea Ottmann, Inspector General (Kontrolldirektør), Foreign Service Control Unit

Torfinn Rislåa Arntsen, Senior Adviser, Foreign Service Control Unit

Vigdis Halvorsen, Assistant Director, Section for Development Assistance Administration

CLIMATE & ENVIRONMENT SECTOR CASE STUDY INTERVIEWEES

Abimanji Sasonko Aji, Kemitraan

Collie F. Brown, Country Manager, UNODC

Matthew Burton, Director, Environment office, USAID Indonesia

Kenney Cetera, Forest legality Junior analyst, WRI Indonesia

Drew Engel, Adviser, Forestry crime prosecution, UNODC

Fredrik Eriksson, formerly NORAD and U4

Mohammed Fadli (Aday), Sustainable landscape officer, GGGI

Rannveig Formo, NICFI, Norwegian Ministry of Climate and Environment



Adam Gerrard, Forest Officer, UN-REDD, FAO

Nurul Ghufron, Commissioner, Corruption Eradication
Commission (KPK)

Amanda Glassman, Vice President, Centre for Global
Development (CGD), USA

Ane Broch Graver, Policy Director, NICFI, Norwegian
Ministry of Climate and Environment

Nadia Hadad, Strategic Development Director, Madani

Noor Hidayati (Yahya), Executive Director, WALHI

Insa Imarifa, Environment management specialist

Zil Irvan, Office of strategic planning, Corruption
Eradication Commission (KPK)

Timothy Jessop, Peatland Development adviser, GGGI

Marianne Johanssen, NICFI, Norwegian Embassy,
Jakarta

Jolanda Jonkhart, Fund and country manager, UNOPS
Indonesia

Vegard Kaale, Ambassador, Norwegian Embassy,
Jakarta

Janeen Madan Keller, Centre for Global Development
(CGD), USA

Susilo Ady Kuncoro, Forestry and climate change
adviser, Norwegian Embassy, Jakarta

Syafira Pyri Larasati, Cooperation specialist, Corruption
Eradication Commission (KPK)

Mads Lie, Policy Director, NICFI, Norwegian Ministry of
Climate and Environment

Lars Lunde, Head of civil society section Environment,
NORAD

Alexander Marwata, Commissioner, Corruption
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Mayang Meilantina, Senior officer, GGGI

Len Milch, Senior engineering adviser, UNOPS

Henry Muryanto, Deputy Chair, Commissioner,
Corruption Eradication Commission (KPK)

Palula Nainggolan, Corruption Eradication Commission
(KPK)

Dian Novianthi, Head of Anti-Corruption Education,
Corruption Eradication Commission (KPK)

Dian Patria, System assessment specialist, Corruption
Eradication Commission (KPK)

Agus Prabowo, Forestry crime project, UNDP Indonesia

Anggalia (Anggi) Putri, Knowledge Management
Manager, Madani

Ahmad Qisa'i, Head of Programmes, Kemitraan

Stephen Rudgard, Country Representative in Indonesia
and Timor Leste, FAO

Rasio Ridho Sani (Pak Roy), Director General for Law
Enforcement, Ministry of Env't & Forestry

Sujsnarko, Head, PJKAKI, Corruption Eradication
Commission (KPK)

Dewi Suralaga, Country representative, CLUA



Laode Syarif, Executive Director, Kemitraan

Jason Seuc, Deputy Director, Environment office, USAID
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Lili P Siregar: Commissioner, Corruption Eradication
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Abdul Situmorang, Forestry crime project, UNDP
Indonesia

Latifa Sitadevi, Forest and land use associate, GGGI

Farah Sofa, DFID partnership adviser, DFID Indonesia

Siska Susanti, Programme Officer Anti-Corruption,
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Yonata (Joey) Syarief, Operations Manager, GGGI

Lisetta Trebbi, NICFI, Norwegian Embassy, Jakarta

Dewi Tresya, Legal specialist, WRI Indonesia

Benjamin Tular, Team leader sustainable landscapes,
GGGI

Arief Wijaya, Forest and Climate Change senior adviser,
WRI Indonesia

Aled Williams, Forestry lead, U4 Norway

Maria Wowro, Procurement manager, UNOPS Indonesia

HEALTH SECTOR CASE STUDY INTERVIEWEES

Philip Armstrong, Head of Governance, Gavi

Jacob van der Blij, Head of Risk, Gavi

Signe Marie Brevik, Section Head Research, NORAD

Paul Catchick, Head of Investigations, Gavi

David Clarke, Public Health adviser, Health Systems
Strengthening, WHO

Mark Edington, Head of Grant Management and
Country programmes, Global Fund

Ida-Eline Engh, Senior Adviser, NORAD

Paul Fife, Head of Health and Education, NORAD

Fatou Fall, Section Head, Compliance Risk and Ethics,
WHO

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Monica Kirya, Senior health adviser, U4

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Øystein Lyngroth, MFA

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WHO

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Heidi Nipe, Senior Adviser, MFA

David Powell, Head of Finance, Gavi

Lise Stensrud, Policy Director, Section for Knowledge
Programmes, Knowledge Bank, NORAD

Arne Strand, Head, U4

Betzy Marie Ellingsen Tunold, Policy Director, Section for
Development Policy, MFA.

Rahul Singhal, Chief Risk officer, Global Fund

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Global Fund

David Webb, Head of the Office of Internal Oversight
Services, WHO

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Andres Augustin Vargas, MFA Chile

Arne Strand, Director U4

Arvinn Eikeland Gadgil, Policy Director, MFA

Berit Fladby, Policy Director, MFA

Betzy Marie Ellingsen Tunold, Policy Director (SDG 16,
incl. Anti-corruption), Section for Development Policy,
MFA

Billy Downer, Senior Counsel, Deputy Director of Public
Prosecutions, National Prosecuting Authority, South
Africa

Bolaji Owusanoye, State Prosecutor, Nigeria

Cecilie Wathne, Advisor, U4

Elsa Gopala Krishnan, Director StAR

Esben Kyhring, Senior Public Prosecutor, ØKOKRIM/
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¹¹⁵ Other examples reported in the survey would require the team further access to Norad's database, as only reported using contract/decision numbers.



Acronyms and Abbreviations

AC	Anti-corruption
CHN	Corruption Hunter Network
CoSP	Conference of States Parties
CPI	Corruption Perception Index
CSO	Civil society organisation
FSCU	Foreign Service Control Unit
FIU	Fraud and Integrity Unit
GMA	Grant Management Assistant
HQ	Headquarters
ICAR	International Centre for Asset Recovery
IFF	Illicit Financial Flows
KLD	Ministry of Climate and Environment
MFA	Ministry of Foreign Affairs
NGO	Non-governmental organisation
NICFI	Norway's International Climate and Forest Initiative
OAG	Office of the Auditor General
OECD DAC	Organisation for Economic Co-operation and Development's Development Assistance Committee
PDIA	Problem-Driven Iterative Adaptation
PFM	Public Financial Management
SDG	Sustainable Development Goal
SFF	Special Financing Facility
StAR	Stolen Asset Recovery Initiative
ToC	Theory of Change

ToR	Terms of Reference
UNCAC	United Nations Convention against Corruption
UNODC	United Nations Office on Drugs and Crime
WHO	World Health Organisation
ZTP	Zero-Tolerance Policy



Former Reports from the Evaluation Department

2020	2018	
4.20 Evaluation of Norway's Aid Concentration	13.18 The Norway-India Partnership Initiative Phase II: Impact Evaluation of Five Interventions	7.18 International tax agreements and domestic resource mobilisation: Norway's treaty network with low-income countries in Africa
3.20 Blind Sides and Soft Spots: An Evaluation of Norway's Aid Engagement in South Sudan	12.18 Evaluation of Organisational Aspects of Norwegian Aid Administration	6.18 Country Evaluation Brief: Mali
2.20 Evaluation of the Norwegian Aid Administration's Approach to Portfolio Management: Norwegian Agency for Development Cooperation	11.18 UNGP, Human Rights and Norwegian Development Cooperation Involving Business	5.18 Country Evaluation Brief: Tanzania
1.20 Norwegian Development Assistance to Private Sector Development and Job Creation	10.18 A Trusted Facilitator: An Evaluation of Norwegian Engagement in the Peace Process between the Colombian Government and the FARC, 2010–2016	4.18 Evaluation of the Norwegian Aid Administration's Practice of Results-Based Management
2019		3.18 Country Evaluation Brief: Haiti
1.19 Evaluation of Norway's Multilateral Partnerships Portfolio The World Bank and UN Inter-Agency Trust Funds	9.18 Civil society under pressure: Synthesis study of evaluations of Civil Society Organisations' democratisation and human rights work in Southern and Eastern Africa	2.18 Country Evaluation Brief: Ethiopia
Making Evaluation Work for the achievement of SDG 4.5 Equality and inclusion in education	8.18 Evaluation of Norwegian Efforts to Ensure Policy Coherence for Development	1.18 From Donors to Partners? Evaluation of Norwegian Support to Strengthen Civil Society in Developing Countries through Norwegian Civil Society Organisations



2017

11.17 Country Evaluation Brief: Myanmar

10.17 Country Evaluation Brief: Nepal

9.17 Realising Potential: Evaluation of Norway's Support to Education in Conflict and Crisis through Civil Society Organisations

8.17 Norway's International Climate and Forest Initiative: Lessons learned and recommendations

7.17 Real-time evaluation of Norway's International Climate and Forest Initiative. An evaluation of empowerment of indigenous peoples and forest dependent local communities through support to civil society organisations

6.17 Monolog eller dialog? Evaluering av informasjons- og kommunikasjonsvirksomhet i norsk bistands- og utviklingspolitikk

5.17 Country Evaluation Brief: Palestine

4.17 Country Evaluation Brief: Malawi

3.17 Country Evaluation Brief: Somalia

2.17 How to engage in long-term humanitarian crises – a desk review

1.17 The Quality of Reviews and Decentralised Evaluations in Norwegian Development Cooperation

2016

8.16 Country Evaluation Brief: Mozambique

7.16 Country Evaluation Brief: Afghanistan

6.16 Country Evaluation Brief: South Sudan

5.16 Evaluation of Norway's support for advocacy in the development policy arena

4.16 Striking the Balance: Evaluation of the Planning, Organisation and Management of Norwegian Assistance related to the Syria Regional Crisis

3.16 Real-Time Evaluation of Norway's International Climate and Forest Initiative. Literature review and programme theory

2.16 More than just talk? A Literature Review on Promoting Human Rights through Political Dialogue

1.16 Chasing civil society? Evaluation of Fredskorpset

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10.15 Evaluation of Norwegian Support to capacity development

9.15 Evaluation series of NORHED: Evaluability study

8.15 Work in Progress: How the Norwegian Ministry of Foreign Affairs and its Partners See and Do Engagement with Crisis-Affected Populations

7.15 Evaluation of Norwegian Multilateral Support to Basic Education

6.15 Evaluation Series of NORHED Higher Education and Research for Development. Evaluation of the Award Mechanism

5.15 Basis for Decisions to use Results-Based Payments in Norwegian Development Aid



- 4.15 Experiences with Results-Based Payments in Norwegian Development Aid
- 3.15 A Baseline Study of Norwegian Development Cooperation within the areas of Environment and Natural Resources Management in Myanmar
- 2.15 Evaluation of Norway's support to women's rights and gender equality in development cooperation
- 1.15 Evaluation of the Norwegian Investment Fund for Developing Countries (Norfund)

2014

- 8.14 Evaluation of Norway's Support to Haiti after the 2010 Earthquake
- 7.14 Baseline. Impact Evaluation of the Norway India Partnership Initiative Phase II for Maternal and Child Health
- 6.14 Building Blocks for Peace. An Evaluation of the Training for Peace in Africa Programme

- 5.14 Evaluation of Norwegian support through and to umbrella and network organisations in civil society
- 4.14 Evaluation Series of NORHED Higher Education and Research for Development. Theory of Change and Evaluation Methods
- 3.14 Real-Time Evaluation of Norway's International Climate and Forest Initiative: Synthesising Report 2007-2013

- 2.14 Unintended Effects in Evaluations of Norwegian Aid

- 1.14 Can We Demonstrate the Difference that Norwegian Aid Makes? Evaluation of results measurement and how this can be improved

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- 5.13 Real-Time Evaluation of Norway's International Climate and Forest Initiative: Measurement, Reporting and Verification

- 4.13 Evaluation of Five Humanitarian Programmes of the Norwegian Refugee Council and of the Standby Roster NORCAP

- 3.13 Evaluation of the Norway India Partnership Initiative for Maternal and Child Health

- 2.13 Local Perception, Participation and Accountability in Malawi's Health Sector

- 1.13 A Framework for Analysing Participation in Development

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- 9.12 Evaluation of Norway's Bilateral Agricultural Support to Food Security

- 8.12 Use of Evaluations in the Norwegian Development Cooperation System

- 7.12 A Study of Monitoring and Evaluation in Six Norwegian Civil Society Organisations

- 6.12 Facing the Resource Curse: Norway's Oil for Development Program



5.12 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Lessons Learned from Support to Civil Society Organisations

4.12 Evaluation of the Health Results Innovation Trust Fund

3.12 Evaluation of Norwegian Development Cooperation with Afghanistan 2001–2011

2.12 Hunting for Per Diem. The Uses and Abuses of Travel Compensation in Three Developing Countries

1.12 Mainstreaming disability in the new development paradigm

2011

10.11 Evaluation of Norwegian Health Sector Support to Botswana

9.11 Activity-Based Financial Flows in UN System: A study of Select UN Organisations

8.11 Norway's Trade Related Assistance through Multilateral Organizations: A Synthesis Study

7.11 Evaluation: Evaluation of Norwegian Development Cooperation to Promote Human Rights

6.11 Joint Evaluation of Support to Anti-Corruption Efforts, 2002–2009

5.11 Pawns of Peace. Evaluation of Norwegian peace efforts in Sri Lanka, 1997–2009

4.11 Study: Contextual Choices in Fighting Corruption: Lessons Learned

3.11 Evaluation: Evaluation of the Strategy for Norway's Culture and Sports Cooperation with Countries in the South

2.11 Evaluation: Evaluation of Research on Norwegian Development Assistance

1.11 Evaluation: Results of Development Cooperation through Norwegian NGO's in East Africa

2010

18.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative

17.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Tanzania

16.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Indonesia

15.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Guyana

14.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Democratic Republic of Congo

13.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Brasil

12.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative (NICFI)



- 11.10 Evaluation: Evaluation of the International Organization for Migration and its Efforts to Combat Human Trafficking
- 10.10 Evaluation: Democracy Support through the United Nations
- 9.10 Study: Evaluability Study of Partnership Initiatives
- 8.10 Evaluation: Evaluation of Transparency International
- 7.10 Evaluation: Evaluation of Norwegian Development Cooperation with the Western Balkans
- 6.10 Study: Evaluation of Norwegian Business-related Assistance Uganda Case Study
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- 4.10 Study: Evaluation of Norwegian Business-related Assistance South Africa Case Study
- 3.10 Synthesis Main Report: Evaluation of Norwegian Business-related Assistance
- 2.10 Synthesis Study: Support to Legislatures
- 1.10 Evaluation: Evaluation of the Norwegian Centre for Democracy Support 2002–2009



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