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**Mid-term review of
IMPACT - 'Improving
accountability
through
fighting corruption
and increased access
to justice'**

Final Report

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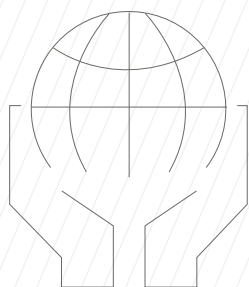
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This report was written by Abigail Hansen and Pierre Robert, with input from Clarence Kipobota (National Expert, Tanzania).

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The authors remain responsible for any errors and omissions.

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Abbreviations

BSAAT	Building Sustainable Anti-Corruption Action in Tanzania
CA	Contracting Authority
CSO	Civil Society Organisation
DANIDA	Danish International Development Agency
EU	European Union
Evaluation	The Evaluation of the IMPACT Programme
EUD	European Union Delegation
FCDO	British Foreign Commonwealth and Development Office
FYDP II	Tanzania Five Year Development Plan II (2016/17-2020/21)
GoT	Government of Tanzania
IMPACT	Improving Accountability through Fighting Corruption and Increased Access to Justice Programme
KE2	Key Expert 2
KPI	Key Performance Indicator
LSF	Legal Services Facility
MoCLA	Ministry of Constitutional and Legal Affairs
MS	Member States of the European Union
NACSAP I	National Anti-Corruption Strategy and Action Plan I (1999-2007)
NACSAP II	National Anti-Corruption Strategy and Action Plan II (2008-2011)
NACSAP III	National Anti-Corruption Strategy and Action Plan III (2017-2022)
PCCB	Prevention and Combating of Corruption Bureau of Tanzania
PD	Project Director (for Specific Contract)
PE	Programme Estimate for IMPACT
PM	Project Manager
Programme	The IMPACT Programme
QA	Quality Assurance
QAM	Quality Assurance Manager
SDG	United Nations Sustainable Development Goals
SOC	Serious Organised Crime
TL	Team Leader
ToRs	Terms of Reference
UK	United Kingdom
UN	United Nations

1 Background

1.1 Context

Tanzania is a low middle-income country, with high GDP growth at 7% on average, which enjoys relative peace and stability. The poverty rate has steadily improved from 34 % in 2007 to 26 % in 2018¹. Accountability has also improved, through the development of accountability institutions, an active civil society, and pluralistic media.

However, Tanzania currently finds itself at an historical inflexion point after the sudden death of President John Magufuli in March 2021, shortly after commencing his second term, and the increasingly clear impact of the Covid-19 pandemic. President Magufuli left however a legacy of building a resilient economy and human capital development.

The Sixth Government under President Samia Suluhu Hassan has pledged to continue with the efforts of strengthening the institutional governance framework, and maintaining democracy, human rights, and peace and security. She has indicated her commitment to enhancing freedom of speech, freedom of expression, the right to information, and upholding the rule of law. This underlines the government's citizen-centric approach, wherein the fight against grand corruption is central in ensuring equality through the provision of social services and the promotion of economic and cultural rights. She has also opened doors to partnership and support from development partners and the international community.

1.1.1 Anti-corruption

Tanzania's Five-Year Development Plan II (2016/17-2020/21) (FYDP II), which focusses on economic growth and industrialisation, aims to move the country to upper- middle-income country status. Corruption was identified as a key challenge, hindering the quality of public service delivery, weakening governance systems and constraining the business environment. At the time of the FYDP II, Tanzania ranked 116th in the Transparency International Corruption Perceptions Index (CPI), with a score of 32.2.

The first National Anti-Corruption Strategy and Action Plans (NACSAP I and NACSAP II) developed a stronger legal and institutional framework, including the 2007 *Prevention and Combating of Corruption Act*² and the Prevention and Combating of Corruption Bureau (PCCB)³. In addition, in 2015 President Magufuli launched an anti-corruption campaign, focussing on key areas of corruption. In 2016 a Special Division of the High Court for anti-corruption and serious crime cases was established. NACSAP III (2017-2022) builds on the lessons and achievements of the previous plans, targeting corruption in public procurement, revenue collection, utilisation of natural resources, and the administration of justice, and adopting a multi-stakeholder and multi-level approach. The political economy analysis (PEA) underpinning the BSAAT component takes into consideration the successive NACSAP documents.

Fighting corruption remains a key priority for the government. Tanzania has improved its anti-corruption indicators (2020 CPI score of 38/100 and ranked 94/180), supported by legislative progress on beneficial ownership, regulation of public official assets, and institutional oversight by the national audit office. Importantly, the National Five-Year Development Plan (2021/22 to 2025/26), published after President Hassan took office, referred to PCCB statistics showing a steady increase in cases of alleged corruption brought before the courts and in the amount of assets recovered as a result of court decisions (see table on next page). The Plan also incorporates targets such as addressing conflicts of interest, improving governance systems and coordination of government action, as well as public awareness-raising programmes and corruption cases investigations, which are explicitly linked to the implementation of BSAAT. This can be taken as a further indication of the degree to which BSAAT is aligned with government priorities for the coming planning period.

¹ <https://www.nbs.go.tz/nbs/takwimu/hbs/TanzaniaMainlandPovertyAssessmentReport.pdf>

² <https://www.fiu.go.tz/pcca.pdf>

³ <https://www.pccb.go.tz/index.php/en/> (in Kiswahili)

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Category	Allegations received	Investigation Files Completed	Ongoing Files under Investigations	Investigation Files Closed	File sent to DPP	New Cases filed into courts	Ongoing cases into courts	Conviction cases recorded	Acquitted cases recorded	Total Cases ruled	Assets/funds recovered (billion)
2015/2016	7,303	788	3,525	34	336	443	578	249	275	524	53.9
2016/2017	7,452	956	2,818	103	575	435	602	159	234	393	14.68
2017/2018	8,724	906	723	78	467	495	624	178	118	296	70.3
2018/2019	8,234	894	1,160	15	388	497	672	206	135	341	82.8
2019/2020	13,313	1,079	1,380	72	443	586	633	267	114	381	96.02

Source: PCCB Annual Reports and Website

PCCB Corruption Cases Statistics, 2015/16 to 2019/20, as set out in National Five-Year Development Plan, July 2021.

Tanzania signed the United Nations Convention against Corruption in December 2003, and ratified it in 2005. In accordance with the Convention, a review of Tanzania's implementation of the Convention was carried out in 2018. This followed reviews in 2007 and 2014. The successive reviews identified technical assistance needs in relation to capacity building for Tanzanian anti-corruption institutions, many of which are addressed by the present programme.

1.1.2 Access to Justice

Key challenges in Tanzania are judicial reform, through increased efficiency, transparency and accountability, and increased access to legal services. Access to the formal justice is limited, particularly for women, due to costs, insufficient lawyers, limited knowledge and awareness of rights, and weaknesses in the justice system, in particular as a result of institutional and legal challenges embedded in the criminal justice sector. Women are highly vulnerable to deprivation of property rights, with the second Five-Year development Plan (FYDP II) having identified legal aid's role in the transformation of women's empowerment in society by facilitating access to inherited land, and the ownership of capital.

Despite these challenges, the judiciary is reforming rapidly, with a number of initiatives in the last three years that have increased efficiency. This has included setting timelines for disposal of cases; monitoring the quality of judgments; the establishment of a complaints handling mechanism as well as integrated justice systems.

Furthermore, the 2017 Legal Aid Act coordinates legal aid services and providers, including paralegals, and represented a major improvement in terms of access to justice for vulnerable persons. The government actively engaged non-state actors and the donor community on the operationalisation of this legislation. This has included the development of policy documents, aimed at ensuring the training and registration of paralegals and other legal aid providers, which has increased access to justice in the criminal justice sector. Legal aid service provision has supported legal education and empowerment. Coordination of regional legal aid services has been introduced through the Legal Aid Inter-Sectoral Committee, which has helped to strengthen linkages between the formal and informal legal sectors. Establishment of the National Legal Aid Advisory Board has also increased oversight of legal aid service provision, and strengthened collaboration between state and non-state actors.

It is therefore essential to address sector challenges, through for example improving the accessibility of courts by vulnerable groups, without prejudice to these, and ongoing, reforms.

1.2 The IMPACT Programme

The current evaluation examines the EU-supported action *Improving Accountability through Fighting Corruption and Increased access to justice* (IMPACT), which is comprised of two components, encompassing three contracts:

Anti-Corruption Component

- Building Sustainable Anti-Corruption Action in Tanzania (BSAAT)

Access to Justice Component

- Legal Services Facility (LSF);
- Programme Estimate (PE) for IMPACT.

The overall budget of the action is EUR 15 mill (BSAAT EUR 7.1 mill., LSF EUR 5.1 mill., PE EUR 2.1 mill.), commencing 30 August 2018 and concluding 29 August 2023, and was primarily designed to contribute to the achievement of SDG 16⁴.

As part of EU development policy engagement with the GoT, the EU Delegation (EUD) and Member States (MS) embarked on a coordinated effort to promote an inclusive political system, improve accountability, and sustain peace and stability. The action aimed to improve accountability, through:

- Improving the effectiveness of Tanzanian anti-corruption institutions; and
- Increasing access to justice for all, in particular for women.

IMPACT's anti-corruption intervention is implemented through a contribution agreement with FCDO (formerly DFID), whereas the access to justice component is implemented through a contribution agreement with DANIDA in support of the LSF, which is complemented by a programme estimate with the Ministry of Constitutional and Legal Affairs (MoCLA).

1.2.1 Anti-Corruption Contract (BSAAT)

BSAAT aims to reduce the role of corruption as a barrier to poverty reduction, by improving the capacity and coordination of the criminal justice system in grand corruption cases, achieved through an end-to-end approach to criminal justice for corruption and organised crime offences. The action includes components that support government/judicial anti-corruption institutions, tackle serious and organised crime (SOC), and improve the fiduciary risk environment.

BSAAT has an anti-corruption component and a SOC component, each governed through different mechanisms. The governance of the SOC component was being finalised during the review period. The governance of the anti-corruption component is implemented under the strategic lead of the Programme Steering Committee chaired by the Permanent Secretary, State House, and day-to-day management is carried out by the Programme Delivery Team, in coordination with the programme's nine Beneficiary Institutions (BIs).⁵ The implementation modalities of the BSAAT anti-corruption component have recently been revised, with the original Financial Aid approach being replaced by a Technical Cooperation approach, in keeping with a change in UK policy on financial aid (since the EU directs its support through the UK, its contribution is also bound by the UK policy change).⁶ The new implementation modality, known as the Alternative Delivery Model (ADM), was approved in July 2021 and its implementation commenced in August.

1.2.2 Access to Justice Component (LSF and PE)

The MoCLA programme estimate (PE) aims to reinforce the Ministry's capacity, and implement its policy on legal aid, notably of the Legal Aid Act. This is to be achieved *inter alia* through supporting the activities of the Legal Aid Advisory Board; enhancing the operationalisation of the office of Assistant Registrars; provision of legal aid through support to local government authorities (LGAs); facilitating pro bono services; training paralegals working in the criminal justice sector; supporting community empowerment; raising legal and human rights awareness; facilitating

⁴ Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

⁵ The nine BIs are: Prevention and Combating of Corruption Bureau; Ethics Secretariat; Department of Public Prosecution; National Audit Office; Good Governance and Reform Unit; Judiciary; Business Regulation and Licensing Authority; MoCLA; and Financial Intelligence Unit.

⁶ See: Proposal – BSAAT Alternative Delivery Model, British High Commission, June 2021.

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coordination and dialogue between institutions; sensitising traditional and religious leaders; capacity development of selected legal aid providers (LAP); and expanding and managing monitoring and data collection.

The LSF works to strengthen democracy, good governance, rule of law and respect for human rights. In each of the 28 regions of Tanzania, the LSF provides grants to regional mentor organisations (RMOs), which sub-grant, oversee, develop capacity, coach and mentor paralegal units (registered NGOs). RMOs themselves were not necessarily legal aid providers; some were matured paralegal organisations, while others were gender, women's rights and/or women's empowerment organisations.

The specific objectives of the action are to increase accessibility to basic legal aid services, in particular for women; increased protection of women's rights to land, property, safety and security; active and effective promotion of legal aid and human rights, including women's rights, by formal and informal institutions; and provision of accountable and professional quality legal aid by legal aid providers including paralegals. Its focus is therefore on expanding urban legal aid, legal literacy and legal empowerment, with an emphasis on increased protection of women's rights to safety, security, land and property.

1.3 Evaluation objectives and scope

The current evaluation represents a mid-term review of the IMPACT Financing Agreement, that is encompassing the three contracts that form the totality of the IMPACT programme, and for the period from 30 August 2018 to date.

The Terms of Reference (ToR) state that the main objectives of the evaluation are to provide the relevant services of the European Union and interested stakeholders with:

- An overall independent assessment of the past performance of the IMPACT programme, paying particular attention to its intermediate results measured against its expected objectives; and the reasons underpinning such results;
- Key lessons learned, conclusions and related recommendations, in order to improve current and future Interventions.

In particular, the evaluation will serve to understand the performance of the IMPACT financing agreement, notably *"its enabling factors and those hampering a proper delivery of results in order to adjust its design or implementing modalities"*.

For the BSAAT component, the evaluation is intended to contribute to understanding how far it has delivered results expected in 2018; how far the changes to BSAAT's vision and theory of change have been justified; and whether the EU sees merit in aligning with the UK decision, made in June 2021, to extend BSAAT to March 2025.

For the legal aid component, that is, both the PE and LSF contracts, this evaluation is intended to help assess the success of access to justice programming in Tanzania, and assist in better communicating such success, thereby boosting morale, public relations, and attracting support from funders. The ToR also state that would be useful to assess the efficacy of traditional legal aid provision in the face of a pandemic.

1.4 Evaluation Methodology

The evaluation process was carried out in four distinct phases, as follows:

- Inception and Desk Phase:
- Field Phase
- Synthesis Phase
- Dissemination Phase

The Inception and Desk Phase aimed at structuring the evaluation and clarifying the key issues to be addressed and was conducted from 15 July to 29 July 2021. It comprised initial data collection, background and stakeholder analyses, interviews. The Inception report also contained a reconstruction of the Programme's Intervention Logic and Theory of Change, the full Evaluation methodology, and the Evaluation Matrix containing the Evaluation Questions.

The Field Phase aimed at validating or adjusting the preliminary answers formulated during the Inception and Desk phase, and further completing information through primary data collection. It was conducted from 15 July to mid-September 2021,

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through remote means, and through the engagement of a Tanzanian Expert, thus avoiding the need for overseas travel, and providing contextualisation of the information obtained. The evaluation utilised various information-gathering tools, including ongoing desk analysis, semi-structured interviews, and focus group discussions.

This Synthesis Phase encompassed the analysis of information obtained in the preceding phases, and the preparation of the Draft Final Report and Executive Summary, submitted on 22 October 2021.

The Final Report and Executive Summary were then disseminated, together with an Infographic (in English and Kiswahili) shared through social media, and one-page briefs for each action summarising the key findings and recommendations.

1.5 Evaluation Matrix

The evaluation has assessed the Programme using the six standard DAC evaluation criteria, namely: relevance, coherence, effectiveness, efficiency, sustainability and early signs of impact, which are incorporated in the Evaluation Matrix provided at *Annex 1* below.

1.6 Evaluation Approach

The inception and desk phase was conducted jointly by Ms Abigail HANSEN, the Team Leader (TL) and Mr Pierre ROBERT, the Second Key Expert (KE2). The field research phase was conducted with a hybrid approach, combining remote interviews and in-person meetings. To that end, a senior Tanzanian expert, Mr Clarence KIPOBOTA, conducted interviews and facilitated focus group discussions. Remote interviews were conducted successfully through video link and mobile phone.

The Evaluation has taken into account not only the Programme results, but also the complex relationships between beneficiary institutions and other stakeholders, with a focus on the qualitative nature of the relationships that have been forged. It has also taken into account the overall complexity of the Tanzanian context, particularly in the light of the recent change of political leadership, and the impact of the COVID-19 pandemic.

The evaluation team consulted with a broad range of institutional and civil society stakeholders. The evaluation team consulted with line ministries directly implicated in the design and implementation of the actions; key partner institutions; court personnel; lawyers, paralegals and other legal aid providers; and civil society representatives concerned with anti-corruption efforts and access to justice. A list of persons consulted is provided at *Annex 2* below.

The evaluation has addressed a number of cross-cutting issues, including human rights and gender, with these being a major consideration in both components of the IMPACT Programme.

2 Intervention Logic and Theory of Change

The rationale underlying the IMPACT programme was that:

- Reduced corruption would make more resources available for the implementation of the national agenda set out in the FYDP II; and that
- Successful implementation of FYDP II hinged on the degree citizens and communities can defend and claim their rights.

The programme was therefore originally conceived to ensure greater equity between citizens, and increased public trust in institutions, using an approach intended to combine both demand- and supply-side initiatives: citizen-based advancement of rights and behaviour change to dis-incentivise corruption, in combination with support to the institutional development of Tanzania's anti-corruption bodies and Government's capacity to provide and facilitate legal aid to vulnerable persons, in particular women.

However, there was no express intervention logic or theory of change developed for the IMPACT programme as a whole. The evaluation team has therefore developed an implied theory of change, and associated intervention logic, based on the those initially developed for the two components.

Below is an outline of the original and revised intervention logic and theory of change for each programme component. *Annexe 3* provides diagrams of these, incorporating and highlighting elements of both actions, in particular changes to the intended outputs, and the implications of these on the underlying logic.

2.1 Original Intervention Logic & Theory of Change

Below is a summary of the intervention logic and theory of change as they were developed in the original programme documents; these are represented visually in *Annexe 3*. Certain elements of the original Theory of Change and Intervention Logic were not expressly defined, and were inferred from a variety of programme documents, and are highlighted in these diagrams.

2.1.1 Anti-corruption component

BSAAT's original **intervention logic** was based on the premise that capacity building towards better prosecutions for corruption is necessary, but has not been sufficient given widespread failures of previous one-dimensional strategies.

The hypothesis was that prioritised enforcement of anti-corruption rules, improved corporate governance, and greater accountability of public finances would reduce the perception and incidence of corruption. This in turn would have a positive development impact, increasing business competitiveness and thereby the money available for public services. The programme therefore intended to engage with the social context of anti-corruption work.

BSAAT's proposed **theory of change** (ToC) was that that if appropriate resourcing, expertise, management and learning occur, then outputs will contribute to criminal justice effectiveness, private sector integrity, social norms, and learning.

If these outputs are achieved, then prosecutions will symbolise strong action against corruption, asset recovery will have a deterrent effect, private sector standards of ethics and integrity will improve, and shared national expectations concerning corruption will emerge.

If these intermediate outcomes are achieved, then incentives for corruption will reduce and if incentives are changed, then corruption will play a reduced role as a barrier to poverty reduction in Tanzania (long term outcome).

2.1.2 Access to justice component

The theory of change governing MoCLA's legal aid programmes is that a sound and working legal aid policy and legal framework will enhance access to justice by vulnerable groups, thereby promoting a peaceful and inclusive society for sustainable development. The intervention logic and theory of change of the PE and LSF were effectively merged in programming documents, with the intervention logic firstly based on the assumption that persons who are aware of rights and laws will be in a better position to realise those rights, which contributes to empowerment; and secondly that effective formal and informal justice mechanisms and institutions are part of an enabling environment for development, including economic growth.

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Effective rule of law institutions and legal aid providers educate citizens and communities in legal and human rights, and assist them in claiming these rights. This results in increased protection of women’s rights to land, property, safety and security, and contributes to legal empowerment.

Legal aid facilitates culturally sensitive dispute resolution in order to prevent litigation and promote community harmony; and capacity development and local resource mobilisation contribute to the sustainability of legal aid.

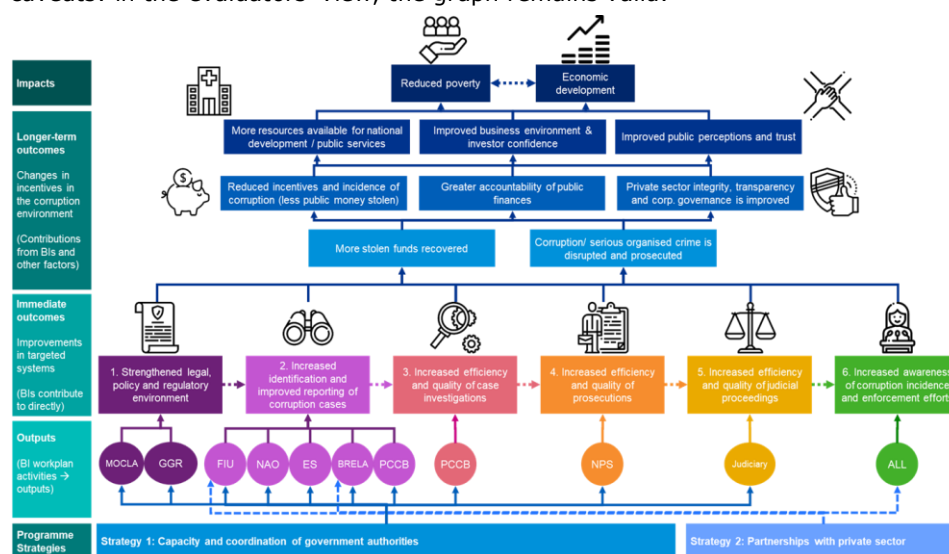
The intervention logic assumes that a capacity development approach targeted at different justice mechanisms, along with support to national supervisory and regulatory mechanisms to oversee the delivery of justice, will lead to a more conducive environment for the provision of legal assistance.

2.2 Revised Intervention Logic & Theory of Change

Below is a summary of the changes that occurred as the programme progressed, and which have had impacts on the underlying logic and theory of change. The evaluators have developed an initial revision of these that are explained in narrative form below, and which are represented visually in *Annex 3*.

2.2.1 BSAAT

Since the original design of the programme, the BSAAT component has adapted to Tanzania’s changing context. The action now has less emphasis on certain components (social norms and private sector), and more on others (criminal justice system and serious organised crime (SOC)). BSAAT also experienced challenges in procuring an implementing partner for the private sector activities, which led to deprioritising of this aspect. BSAAT’s July 2020 logical framework consequently removed the private sector component, and established a focus on SOC. The graph below, extracted from the February 2021 FCDO Annual Review of the BSAAT component, illustrates the current BSAAT theory of change, with some minor caveats: in the evaluators’ view, the graph remains valid.



It will be appropriate, however, to further refine the theory of change, including in preparation for a potential next BSAAT phase. The FCDO Annual Review noted the need to ensure full alignment of the anti-corruption and SOC components; review the validity of the *collective action theory* argument in the context of BSAAT/Tanzania; and understand the value for money implications of suspending the private sector and financial aid work. In the view of the evaluators, these points should be addressed by revising the Political Economy Analysis (PEA) that formed the basis for the original BSAAT ToC: this revision could take account of the current political landscape in Tanzania resulting from the presidential succession, and of the impact of the pandemic on Tanzania’s economic circumstances.⁷

⁷ In comments on an earlier draft of this report, the FCDO noted that a PEA, commissioned in October 2021, was due to present preliminary findings in early November.

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2.2.2 Access to Justice component (PE and LSF)

No significant changes were observed in the context or in the implementation of the access to justice component which warranted a substantial revision of the underlying logic and theory of change of this component.

2.2.3 Revised IL/ ToC

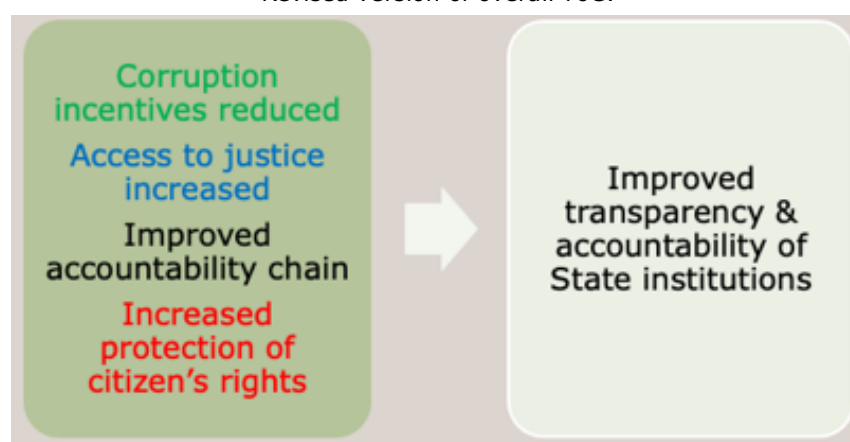
Despite the change of focus of the BSAAT component, the revised overall Theory of Change does not fundamentally alter.

Certain logical inconsistencies were apparent in the original versions – notably a somewhat redundant level of outcomes, which in the revised version has been merged as follows:

Original version of overall ToC:



Revised version of overall ToC:



The increased emphasis on the criminal justice system and serious organised crime does not, in the initial view of the evaluators, substantially alter the underlying programme logic. The BSAAT component targets rule of law institutions in order to tackle corruption. Similarly, the links between corruption and serious organised crime are well established, and enshrined for example in Article 8 of the Organised Crime Convention.

BSAAT clearly adopted the multi-stakeholder approach encouraged by the Tanzanian government, since this is rightly considered to be most likely to create systemic change, through *inter alia* addressing blockages within the system which undermine state capability to process a corruption allegation or case. The removal of the private sector component is not considered to have significant impact on the programme's overarching logic and theory of change. This can be observed by examining the revised ToC and intervention logic, where only minor changes were required, with no impact on the mid- to long-term outcomes, and overall impact. However, the removal of the private sector component risks making the programme less holistic.

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3 Mid-Term Review Findings

The findings present the responses to the Evaluation Questions and Sub-Questions developed during the Inception Phase.

3.1 Relevance

- *To what extent did IMPACT's design respond to Tanzania's needs, policies and priorities, including the achievement of the SDGs?*
- *Is it likely to continue to do so if circumstances change?*

3.1.1 Alignment with national priorities

The programme responds strongly to challenges relative to the fight against corruption and access to justice, which have long been identified as national priorities, but to which institutions have struggled to respond.

The Programme is directly aligned with major national policies, notably the Development Vision 2025⁸, which in Section 3.2 states *inter alia* that "it is desired that the Tanzanian society should be characterized by [...] Strong adherence to and respect for the rule of law [and] absence of corruption". Section 4 outlines the 'driving forces' that must be engaged for the realization of these objectives, underlining at 4.3 that appropriate institutional frameworks are needed to support the rule of law, including engagement with the private sector, and achieving balance between the State and other institutions.

The Programme is also strongly aligned with the National Five-Year Development Plans (FYDP I⁹, FYDP II¹⁰, and FYDP III¹¹), with FYDP III recognising the paramount importance of rule of law, respect for human rights and the fight against corruption as prerequisites for sustainable and inclusive socio-economic development in line with the Sustainable Development goals (SDGs).

Indeed, the Tanzanian government has demonstrated a strong commitment to the implementation, monitoring, tracking and reporting of the Sustainable Development Goals (SDGs), with priority given to strengthening legal institutions and law enforcement, promoting the rule of law, and reducing corruption. Key interventions identified in the FYDP for the achievement of these goals comprise *inter alia* the promotion of effective and efficient justice delivery systems, including strengthening guidelines and procedures for the provision of legal aid; and strengthening accountability.

The programme is therefore aligned with government initiatives aimed at achieving the national strategic plans, including the 2017 Legal Aid Act¹² which regulates, coordinates and systemises the provision of legal aid services to indigent persons, including the recognition of paralegals. It is also aligned with the provisions of the third National Anti-Corruption Strategy and Action Plan (NACSAP III)¹³.

Importantly, the Programme remains relevant to political priorities, even as this has undergone considerable upheaval during the implementation period. It has also remained aligned with institutional priorities, for example the recently adopted five-year Strategic Plan of the LSF.

The Programme also built directly on previous and ongoing rule of law initiatives supported by cooperation partners. For example, Danida has supported the legal sector, access to justice and the LSF, in several iterations, for over 13 years, with a strong emphasis on women's access to justice, the role of civil society organisations in addressing systemic gaps, and the harmonisation of paralegal support within the existing legal aid framework, with the EU's current support conceived as an 'add-on' to this already active cooperation. Similarly, the current BSAAT component builds on a previous version supported solely by the UK.

⁸ <https://mof.go.tz/mofdocs/overarch/vision2025.htm>

⁹ https://mof.go.tz/mofdocs/msemaji/Five%202016_17_2020_21.pdf

¹⁰ https://mof.go.tz/mofdocs/msemaji/Five%202016_17_2020_21.pdf

¹¹ <https://mof.go.tz/docs/news/FYDP%20III%20English.pdf>

¹² https://www.tanzania.go.tz/egov_uploads/documents/LEGAL_AID_ACT_2017_sw.pdf

¹³ https://www.pccb.go.tz/images/stories/joomlart/MACHAPISHO/Mkakati/NACSAP_III_SWA-HILI.pdf? x tr sl=auto& x tr tl=en& x tr hl=en-GB& x tr pto=nui

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Further, the Programme builds strategically on existing partnerships, for example relative to the access to justice component, with one interlocutor noting *'when the EU expressed an interest, we [...] wanted to do this in partnership with MoCLA, because we were already working with them from the outset'*.

Stakeholders confirmed that the access to justice component corresponds strongly with government efforts to increase the physical accessibility of legal aid and judicial services, notably through the establishment of High Court Registries ('branches') in all 25 regions of Mainland Tanzania; ongoing discussions to allow practicing Advocates (lawyers) to represent clients in Primary Courts, which is currently not allowed; and the institutionalisation of paralegal services. Similarly, stakeholders consider that the BSAAT component *'pillared into relevant legal and policy frameworks on access to justice and anti-corruption'*.

Stakeholders also consider that there is strong relevance, coherence and synergy in the two components being conjoined in a single programme, with anti-corruption and access to justice both linked to broader questions of access to services, and accountability.

3.1.2 Alignment with needs

The programme is clearly consistent with Tanzania's needs relative to access to justice and the fight against corruption, as highlighted in the policy documents referenced above, and confirmed by independent data and analyses.

Further, it has capitalised upon an encouraging trend of institutions opening to reform, and management systems being put in place to analyse the rule of law environment more accurately, and thereby adapt to shifting needs.

For example, BSAAT is contributing to an identified need to strengthen the institutional capacities of law enforcement agencies, with stakeholders referring to the particular relevance of digitalisation and other forms of file management; procurement of working tools for investigation, forensic auditing, etc; and the construction of facilities. Support to the latter has included new premises of the Intelligence Directorate of the Prevention and Combating of Corruption Bureau (PCCB); and the National Audit Office (NAO) forensic laboratory.

Similarly, the access to justice component had a strong sense of the opportunities that were available, with LSF stating that *"we came into the project with a vision of where it should go. Our aim was the coordination of the legal aid service, and also to recognise and support paralegals across the country who are accredited, registered, certified, well-trained and able to deliver services"*.

The Programme also responds to the need to enhance inter-agency working relationships, for example between the NAO and PCCB on matters requiring special investigation. Stakeholders highlighted however the ongoing need to complement this with Standard Operating Procedures (SOPs) to systemise and guide inter-agency working relationships at all levels. The Programme has also built on previous efforts by the Business Registrations and Licensing Agency (BRELA) to transpose its registration processes to an online system, through support in the purchase of software.

Government stakeholders also underscored the Programme's relevance to ongoing criminal and civil justice reform, and that it has served to highlight several additional areas requiring improvement, and which have subsequently been the subject of discussion. An example of emerging reform issues is the need to establish 'legal aid desks' within the court system, and in detention facilities and other places where access to justice is challenging. It is also observed that, as implementation of the Legal Aid Act has advanced, the access to justice component has responded to shifting needs on the ground.

Government and institutional officials also indicated that the BSAAT component supports the updating of the mandates and plans of law enforcement agents, stating that this has contributed not only to its relevance, but also its sustainability. Stakeholders consider BSAAT to be an important implementing tool of NACSAP III, with one stating that *'the project has particularly contributed to the aspect of prevention relating to conflicts of interest, which we had been figuring out how to address'*. The Financial Intelligence Unit (FIU) indicated that BSAAT responds to capacity-building needs regarding understanding of international legal frameworks and standards on financial intelligence.

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Key stakeholders of both components also referred to the Programme's contribution to their longstanding need for enhanced institutional visibility, in particular through media engagement.

Some stakeholders felt however that the Programme's response to needs could be strengthened through greater inclusiveness of relevant stakeholders, in particular the national bar association (Tanganyika Law Society (TLS)); the penitentiary system; police services; gender rights initiatives such as committees established under the National Plan of Action to End Violence Against Women and Children (NPA WAWC); local government authorities (LGAs) through their Ministry; the Commission for Human Rights and Good Governance (CHRAGG); the private sector (relative to the fight against corruption, and private law firms for the provision of pro bono legal services); UN agencies, including UNICEF, UN Women and UNDP, who have been working on related areas.

Further, the FIU operates through numerous actors, including financial institutions, insurance companies, and mobile phone operators, referred to as 'reporting persons.' These are all public (government or State) agencies. Stakeholders told the evaluators that BSAAT's scope does not include non-public actors such as insurance companies, banks, etc. In addition, the FIU has operations in both Mainland Tanzania and in Zanzibar; interviewees in Beneficiary Institutions suggested that BSAAT's scope should therefore be widened to encompass Zanzibar, and also to specifically include its partner organisation, the Zanzibar Anti-Corruption and Economic Crimes Authority (ZAECA). BSAAT comprises an anti-corruption component on the mainland and SOC components on the mainland and in Zanzibar. Extending the anti-corruption component to Zanzibar would be challenging, according to BSAAT managers, because some institutions have federal mandates while others have devolved mandates.

Some interviewees also note that the BSAAT component focuses predominantly on the 'supply' side (law enforcement, PCCB, judiciary etc), rather than on 'demand' (public, civil society, etc.), despite the need for multidimensional approaches to combat corruption. This is in fact in line with the revised Theory of Change, which is focused on addressing high-level corruption because this is the type of crime that has the greatest impact on (mis-) governance, and because the Beneficiary Institutions are better placed to address such corruption (because of its links to Serious and Organised Crime) than to address petty corruption.

BSAAT managers fully admit that "petty" corruption is a major social concern, in that it is widely experienced in Tanzania and may be a source of fatalism and disbelief in the justice system. However, this does not detract from the intervention logic's focus on "grand" corruption.¹⁴

The evaluators noted that support for recent changes of BSAAT's performance indicators and results areas was somewhat mixed, although minds appeared to be changing. Certain national stakeholders took the view that the shift of focus from the institutional to the national level had strengthened BSAAT's alignment with NACSAP III, and other anti-corruption initiatives. Some however considered that the shift reduced the relevance and implication of certain beneficiaries, in particular the Ethics Secretariat, the FIU and the National Prosecution Office (NPS). Some interviewees stated that this decision was reached without adequate consultation of beneficiaries and that it required them to re-shape institutional plans in order to align with the new framework, rather than focusing on plans that had already been endorsed. Some stakeholders indicated that they have great difficulty aligning the new results areas with their overarching mandates.

Despite these statements, it should be noted that the Permanent Secretary commented at a Steering Committee meeting in Jan 2021 that institution-based KPIs were delivering limited impact; that systemwide impact can only be measured if systemwide KPIs are adopted; and that asking more of the BIs was bound to encounter some resistance. It is also to be noted that, in recent months, more BIs have been supportive of the system-wide approach. Nevertheless, it is clear that BIs

¹⁴ The two forms of corruption, "petty" and "grand", should not be seen as exclusive of one another. "Petty" corruption (e.g. payments demanded by low-level officials) is often a sign of greater corruption at senior level, which is where BSAAT's capacity-building focus is located.

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need continued support to help each BI account for its BSAAT activities in terms of KPIs.

3.2 Coherence

- *To what extent are IMPACT's actions internally coherent; specifically, with each other and within each action's Theory of Change?*
- *To what extent are IMPACT's actions coherent with EU, UK and Danish cooperation objectives, and with other interventions carried out by DPs and/or GoT?*

The programme is very coherent; each component is based on a clear intervention logic and activities, outputs and expected outcomes are intertwined in a logical manner. While the evaluators do not foresee concerns about internal programme coherence in the future, they note the following issues:

- With regard to the LSF/MoCLA component, it is important to maintain close coordination with other actors in the field, particularly those working with vulnerable groups, whose activities inevitably include a legal assistance dimension. In particular, it will be important going forward to liaise closely with UN Women, UNICEF and potential new actors addressing the exercise of their rights by women, victims of child trafficking, etc. This dimension is also important in that it provides a further opportunity to link the LSF/MoCLA and the BSAAT components of the programme.
- The BSAAT review process that was engaged in as part of the development of the Alternative Delivery Model was, in effect, an opportunity to review the coherence of the programme, particularly in terms of the financial and human resources needed to deliver results, and of the management mechanisms to be implemented. The review has strengthened the programme's coherence – at least on paper. It will be important, as the ADM is being implemented, to prevent administrative bottlenecks from forming, for example in relation to the timely delivery of funds – because extended delays in this regard may risk hampering the overall coherence of the programme.

The evaluators did not identify concerns relating to coherence with regard to the activities and plans of other development partners. It should be noted in this regard that the IMPACT programme as a whole is (by far) the largest of the current development cooperation programmes addressing justice/governance issues in Tanzania. As such, its relevance and coherence both benefit from its "critical mass", which strengthens the likelihood that it will achieve planned outcomes.

3.3 Effectiveness

- *To what extent are IMPACT's actions effective, or likely to be effective, in achieving its objectives & expected results?*
- *How well has IMPACT responded to change?*
- *What modifications should each action be taking to improve effectiveness?*

The Programme is generally being implemented in line with its objectives, results areas and indicators, however it is unrealistic to expect the full delivery of results and outcomes at a mid-term evaluation. Nevertheless, implementing partners indicate that they have been able to deliver 90% of planned activities relative to disbursed funds, and there is evidence of significant emerging results from all Programme components.

3.3.1 Responsiveness

An important preliminary factor to consider relative to effectiveness is the Programme's responses to the exceptional challenges that have emerged during the implementation period, and continuing to some extent. These have included the restrictions imposed by the COVID-19 pandemic, the dramatic change of leadership in early 2021, as described above, leadership changes within key institutions, and several implementation issues. The Programme generally showed great flexibility and resilience in its handling of these constraints and uncertainties, and has resumed and redoubled its activities.

The COVID-19 pandemic clearly had the most direct and significant impacts on programme implementation, and hence overall effectiveness. While Tanzania did not have travel and other restrictions in 2020 to the same extent as many other countries, it nevertheless dramatically impeded work-flow for a number of months.

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For example, BSAAT's activities were affected for a four-month period in 2020, notably relative to the provision of international expertise to Tanzanian counterparts, particularly judicial expertise, but also on the depth and breadth of relationships the programme was able to build. However, the impact of the pandemic was mitigated by the financial aid relationship with the government, through which government partners continued to operate.

The immediate effect of the pandemic on the LSF/PE components was the scaling down of legal aid services for part of 2020 in line with COVID prevention guidelines and standard operating procedures. This slowed significantly impeded overall access to justice, and aggravated gender-based violence¹⁵. Furthermore, many legal aid activities supported by the project required travelling and gathering information; such activities were restricted at the start of the pandemic, and concerns prevented certain stakeholders from participating.

The PE also experienced delays related to the pandemic, however MoCLA has resumed implementation of the amended annual work plan, including recruitment and training of paralegals, public information, etc. A key challenge, however, in the coming year will be adhering to this work plan, which is ambitious, and requires greater resources to catch up from this disruption.

The LSF was also impacted by the pandemic, in particular in 2020, and stated that *"we had to regroup, re-examine for ourselves, LSF and all our partners, and think about how to continue. We didn't want to stop, since communities are still in need of legal aid services. We ensured that we found new innovative ways of working, so technology became very important. We also had to find a way, physically, because paralegals' work is educating and supporting communities."* LSF's partners and grantees also found innovative ways of working, having produced several YouTube videos, and conducted virtual meetings and training.

The death of President Magufuli in March 2021 created a period of considerable uncertainty surrounding the rule of law reform agenda; however, this does not appear to have ultimately had any significant impact on the strategic foundations of the Programme, nor on its implementation. Indeed, incoming President Samia Suluhu Hassan has continued with anti-corruption efforts, with high-profile arrests, new constitutional appointments, and strong messaging. This provided considerable strategic opportunities for the reform agenda, and BSAAT in particular.

An additional challenge for the Programme arose in early 2021, when the UK decided to cease 'financial aid' to Tanzania, as a consequence of irregularities observed in the October 2020 elections. As EU support to BSAAT is routed through the UK, this also impacted the EU's contribution. The EU, UK and GoT consequently developed an *Alternative Delivery Model*, focussed on providing continuity to the relationships and structures already developed; preserving GoT leadership of BSAAT's vision; and improving the effectiveness and efficiency of delivery. The implementation of the *Alternative Delivery Model* commenced in September 2021.

There are however some lingering concerns that the *Alternative Delivery Model* risks damaging the government's own financial credibility, since it conveys the impression that it is incapable of managing programme funds. There is also concern regarding potential security risks of handling sensitive data, for example in the procurement of sensitive material such as ICT equipment for the PCCB, police and other law enforcement agencies.

Finally, the GoT introduced a new information management system for direct funds to the Programme, which aimed to ensure effective tracking of donor funded projects, however its roll-out experienced faced a number of challenges, including user compliance. This caused a delay in the submission of reports and the release of funds for the subsequent year. The online system has since been improved, with technical staff having received training on the system, and modalities developed to prevent future difficulties, by employing more informal ways of communicating information and documents, while the system channels formal reports.

Several stakeholders consider that the Programme funding framework does not offer sufficient flexibility to address emerging issues, particularly serious constraints such as those already experienced. In this regard, the development of a rapid response

¹⁵ <https://www.humanrights.or.tz/reports/tanzania-human-rights-report-2020>

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fund has been suggested, and to which donors and GoT could give some consideration.

3.3.2 Delivery and outcomes

3.3.2.1 General

The Programme clearly benefits from its substantial financial size, which has enabled it to achieve a critical mass of activities, and has also capitalised upon ongoing political will to address shortcomings in the fight against corruption and access to justice. It is also noted that changes have been observed relative to the degree to which partner institutions are collaborating together; it is hypothesised that results in this regard will help support not only effectiveness and sustainability, but also the programme's overall relevance.

3.3.2.2 LSF/ MoCLA

Overall, the access to justice component of IMPACT has delivered above and beyond its targets, in terms of its reach, and number of cases and referrals. LSF conducted a mid-term review in 2019, which found that LSF enables more citizens to access justice, in particular women; increases citizen empowerment to claim their rights; and contributes to attaining SDG 5 (gender) and 16 (peace and justice). The evaluation recommended that existing systems and approaches be maintained in order to realise the intended results, which has been done in the intervening period.

An important legacy of the project has been its stimulation of vigorous discussion regarding reform on a number of important issues, as indicated above, for example the need to address sustainability of the paralegal system within the legal framework, in particular relative to reliable and adequate budget lines.

The project has also highlighted the need for greater investment in the capacity and competence of paralegals, to ensure the quality of the legal aid services provided, with external observers having expressed some concerns in this regard.

An important achievement has also been ensuring the establishment and consolidation of paralegal desks at police stations, prisons and within the court system, with at least 150 paralegals to be trained and deployed to such desks in 2021, encompassing both civil and criminal matters.

However, there is clearly a need to establish further, more specialised paralegal desks within other services, for example immigration, with corresponding training manuals. Moreover, there is clearly need to increase the existing pool of paralegals, to address demand. Such extensions of services should be in line with CHRAGG standards, given that its human rights mandate, and broad investigatory, monitoring and prosecution powers including on matters involving places of detention and detainees, and other vulnerable groups.

Further, the project has highlighted the need for alignment between the mandate of the Office of Registrar of NGOs and that of the Registrar of Legal Aid Providers (MoCLA), in order to avoid a duplication of efforts, and to relieve paralegals from double accountability, such as the payment of fees and preparation of annual reports. The planned creation of a unifying accountability model for paralegals would be an initiative to which the project could contribute its expertise and inputs.

An important result of the project has also been its contribution to the operationalisation of the newly-established National Legal Aid Advisory Board under the Legal Aid Act, which aims *inter alia* to identify any areas requiring reform. Again, the project will continue to have an important role in supporting the Board out into the future.

The project has ensured that its activities have reached beyond Dar es Salaam and Dodoma, and also beyond regional cities, in particular relative to vulnerable persons. In particular, it has made significant contributions to the establishment and operationalisation of 16 regional legal aid coordinating committees, however further support will be necessary relative to the amendment of the law in order to give formal legal status to these committees. Training of local government authorities and traditional leaders has also demonstrated the project's broad geographic scope,

However, the project is also characterised by the density of its activities, which has served to highlight more acutely areas of ongoing need, with stakeholders at the local level showing great interest in follow-up interventions. It is uncertain however whether the project has the capacity to respond to the increased demand that it

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generates, with one interlocutor noting that “[the project] is wide but not very deep”.

Stakeholders have perceived substantial improvement in the adjudication of land cases, in particular at the ward level of governance, arising from the training of members of the ward land tribunals in the Tanga and Simiyu regions. This amply demonstrates the importance of building the capacities of such tribunals, which have the potential to provide timely, effective, and specialised justice.

The access to justice component has been highly effective in establishing and consolidating qualitative relationships and partnerships, including with the TLS, The Law School, and other institutions and stakeholders. Key informants have also observed significantly improved coordination of the implementation of the Legal Aid Act between MoCLA and the LSF, as well as with other non-state actors and paralegals.

An important planned project initiative will be the training of 220 women in Kondo (Dodoma) from existing women and community groups as qualified paralegals, with a view to replicating this in other regions. This will contribute significantly to women’s access to justice at the national level.

While the project has made strong contributions to the national law reform agenda, by highlighting areas of concern as described above, this is not specifically indicated in the project design, and limits its scope to work more directly on law reform issues. Stakeholders have suggested that in order to address this gap, the Law Reform Commission of Tanzania (LRCT) could be incorporated as a partner.

Stakeholders also highlighted MoCLA’s limited capacity to monitor compliance of the law at the national level, in particular relative to the quality of legal aid services, coupled with an inadequate monitoring and evaluation framework in this regard. Notably, a review of the first four years of the Legal Aid Act’s implementation is yet to be established; this is an area to which the project should give its attention as a matter of priority in the coming months.

Further, it was highlighted that access to justice is not linked to economic empowerment initiatives, with project design predominantly focusing on ‘control’ efforts and not necessarily ‘prevention’ measures, such as the correlation between income and access to justice. Stakeholders have suggested that the project’s framework be re-aligned to encompass multi-sectorial issues surrounding access to justice, as well as corruption.

There is also a concern that the project does not provide adequate attention to institutional strengthening of the lower courts and tribunals, in particular the primary courts and ward tribunals, which experience significant technical and institutional challenges, including judicial capacity and technology.

Increasing the capacity of paralegals has also been highlighted as requiring further support, and in particular:

- *Professionalism and reinforced skills*: There is a need for ongoing capacity building of paralegals, which could be strategically and feasibly linked to learning institutions, such as the Institute of Adult Education, and the Law School of Tanzania, and possibly through exchange programs with private lawyers. This would further reinforce the project’s approach of including non-state actors.
- *Incentivisation*: Stakeholders consider that the Legal Aid Act and other relevant laws could provide greater motivation of paralegals working on a voluntary basis. Stakeholders suggest that this could be through increased formalisation and recognition of paralegal courses, which would in turn increase trust, acceptance and demand for their services.
- *Regional Mentorship Organisations*: RMOs were LSF sub-grantees mandated to contract paralegals, provide oversight, and technical support through mentorship, coaching and capacity building. The 2020LSF midterm evaluation of LSF found that, while this system worked well, there was a concern that an inequitable level of funding was disbursed at this level, rather than on direct service delivery by the paralegals themselves. Whilst the efficiency argument is not in dispute, stakeholders are concerned that the decision to discontinue RMOs has left paralegals struggling to build their institutional and operational capacities, which in turn impacts on their effectiveness and credibility. Consideration could be perhaps given to the re-establishment of a more cost-

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effective mentorship facility in future LSF activities.

An important achievement of the access to justice component has been its regional reach and influence, with LSF the current Chair of the East Africa Paralegal Network. This has allowed them to share their experiences in the implementation of the Legal Aid Act to a much broader audience, in countries that are beginning their own path towards reliable legal aid structures and legislation.

3.3.2.3 BSAAT

Interviewees highlighted that an important achievement of the BSAAT component has been the development of the Operation Management Manual (OMM) and a result-based work plan for all BSAAT's beneficiaries. This has helped ensure, as confirmed in reports, that participating institutions have clear targets and that results achieved are clearly mapped. Interviewees also noted that, thanks to their increased visibility, the beneficiary institutions have achieved a higher public profile and have been approached by other stakeholders for partnership in addressing corruption.

The PCCB, as a major beneficiary of BSAAT activities, has been able to improve its use of technology and procure equipment for investigation which was previously missing or inadequate. It has also been able to develop public awareness campaigns, especially through school clubs; to conduct national governance anti-corruption surveys, and notable to implement a corruption reporting app, which members of the public are able to use to report allegation of corruption. As mentioned above in this report, financial investigation and asset tracing has contributed to the recovery of some public funds, which interviewees also largely attribute to the capacity-building activities of BSAAT.

Interviewees also took the view that BSAAT helped indirectly to hasten a number of reforms including the enactment of laws and regulations on plea-bargaining; compounding of offences; use of alternative dispute resolutions (ADR) in criminal cases; enactment of the Arbitration Act of 2020; formulation of regulations on the consent of director of public prosecution (DPP) on corruption cases. All these reforms are intended to, among other benefits, streamline the judicial process. Interviewees also noted that the project led to an amendment of the NPS law in 2019, providing for the delegation of DPP's prosecutorial powers to the regional levels. A small number of court clerks have been trained on judicial ethics and management of judicial proceedings generally. According to officials interviewed, those who participated in these training sessions have demonstrated improved skills. However, only about 2.5% of all clerks have so far been trained.

Among the most important factors of BSAAT's effectiveness have been:

- Extensive research, training and mentoring work in relation to addressing SOC. Resulting in part from the freeing of some resources after the deprivatisation of private sector-related activities, the SOC activities have been highlighted as initial successes by interviewees (plans for UNDP to contribute to SOC activities were being developed at the time of the review).
- Training for judges conducted by the Slynn Foundation was also a major contributor to effectiveness. The Slynn Foundation's access to very senior British judges with highly relevant experience helps ensure buy-in from their Tanzanian counterparts. The Foundation's approach, seeking to ensure that training gets mainstream in professional development curricula, also contributes to the programme's sustainability.
- Coordination among beneficiary institutions. The government of Tanzania has entrusted most aspects of the fight against corruption to the nine institutions that are targeted by BSAAT.¹⁶ The division of labour amongst the nine institutions inevitably carries the risk that each would act in a "silo", possibly disregarding the approaches taken by others and failing to learn from them. By placing consultations and coordination at the core of the BSAAT approach, with support from State House, the programme has been able to enhance institutional coordination, and is likely to maintain its emphasis on this aspect in future.

Against this positive background, two factors limiting effectiveness may be noted:

¹⁶ Other institutions of course also play a role in this regard, including Parliament. Civil society and the media are also important actors in their own right.

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- Delays in implementation of activities attributed to the delay of disbursement of funds. Some interviewees noted that funding stalled for almost half a year in 2020 due to the election and the pandemic. This slowed down activities such as the development by NPS of the Standard Operating Procedure for the delegation of DDP's powers of consent in corruption cases. These delays, however, do not appear to be systemic because they were largely attributable to the pandemic. However, some interviewees expressed concern that the changeover to the ADM may also cause administrative delays.
- The switch to cross-system Key Performance Indicators may in some cases interfere with earlier planning by beneficiary institutions. In some cases, previously planned activities may not directly address KPIs and may need to be revisited or replaced with others.

3.4 Efficiency

- *To what extent are IMPACT's costs proportionate to the benefits it has generated to date?*
- *What factors are influencing any discrepancies?*
- *To what extent have the actions achieved results efficiently?*

The programme is generally efficient, in the two main acceptations of this notion:

- The programme represents appropriate value for money, in the sense that it is operating to date within budget and in accordance with planned allocations. Overall the IMPACT budget devotes most resources to human expertise (training and mentoring of officials and members of the judiciary, support for lawyers), while further funding is provided to support logistics, institutional coordination, etc. These costs are aligned with plans and expected results.
- Equally important in the assessment of the programme's efficiency is the quality of programme management. In this respect, the programme is performing very well. Reports and interviews have shown that the staff managing the programme – Tanzanian officials as well as representatives of the donors – have responded to changing circumstances (including the presidential transition and the pandemic) in a timely and effective manner, as demonstrated *inter alia* by the progress made in relation to ADM for BSAAT. The evaluators also noted that the programme manager themselves are accountable, both to their own institutions and to the Steering Committee.

As is the case in all justice and institutional capacity-building programmes, a key challenge to address to further enhance efficiency resides in the internal management and reporting mechanisms implemented by the beneficiary institutions, where results-based monitoring ultimately resides. Some interviewees have noted that substantial progress has been made in this respect. For example, MoCLA has implemented online systems for registration and performance monitoring. In BSAAT, substantial efforts have been made to ensure that PCCB and the other institutions also record and analyse data on results achieved – though it appears that not all relevant data are shared amongst institutions on a regular basis, or made publicly available.

It will be important for the project going forward to strengthen the monitoring capacity of the beneficiary institutions and to ensure that sustainable systems are maintained for data to be compiled, analysed and shared in a timely manner. Relevant data should be publicly available, as long as this does not hamper prosecutions.

3.5 Sustainability

- *To what extent are IMPACT's benefits, including structures, likely to continue/remain after the end of the programme?*
- *What key factors require attention in order to improve the prospect of sustainability of outcomes and the potential for replication/scale-up in Tanzania or elsewhere?*

While it is somewhat premature to fully assess the sustainability of Programme results, there is preliminary evidence of the likelihood that this will be achieved in

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terms of capacities built, institutional mechanisms established and professional relationships built and nurtured.

Stakeholders observe that a significant advantage of the PE compared to ordinary project funding is that the PE is fully part of the MoCLA Strategic Plan, and is well co-financed with the Tanzanian national budget. As a consequence, personnel working on this aspect of the programme are permanent MDA employees. This will ensure that, subject to future national plans, policies and budgeting, the activities funded by the PE should continue even after the completion of the PE.

Related to this, the Programme framework has been directly linked to existing governmental structures and operations (relative to both the access to justice and anti-corruption components), such as legal aid desks, Legal Aid Week, and law enforcement mandates and operations.

The relevance of the Programme to the national and sector strategic framework, including the FYDP III and NACSAP III, is also a strong factor in support of the results' sustainability. Furthermore, there are strong indications that the forthcoming National Anti-Corruption Strategy (NACSAP IV) will mainstream and institutionalise many of IMPACT's components.

The 2021-2026 Judiciary of Tanzania's Strategic Plan has reflected some components of BSAAT, for example relative to anti-corruption matters, and capacity building and ethics awareness-raising of judicial officers.

The NAO and PCCB have also embedded a number of IMPACT Programme components into their operational plans, for example with training of trainers reflected in their institutional plans, and with accompanying budget lines. The judiciary and the FIU have also allocated funds to areas where IMPACT has been unable to meet needs, for example the purchasing of scanners, laptops, and other equipment and their maintenance, and upgraded software and server.

Concerns are raised however relative to the sustainability of certain interventions, for example the provision of pro-bono services, which lack continuity and coverage. There are also insufficient formal linkages to existing legal aid services, including those provided by the bar association (TLS), gender rights committees, and local government mechanisms.

Active consideration is being given to the establishment of appropriate exit strategies, to ensure that the support of the EU, Danida and the FCDO is phased out responsibly. For example, Danida for its part is working with the LSF on programming for the upcoming three-year period, general sustainability of the results, and sourcing support from other cooperation partners.

3.6 Impact

- *To what extent are the intended and unintended outputs/outcomes being delivered by IMPACT's actions being translated into the desired impact?*

Impact is framed in this section in terms of the likelihood of achieving impact over the entire programme period, and beyond. In this regard, early evidence of impact relative to the access to justice component can be seen in the operationalisation of the Legal Aid Officer and Office of the Registrar, and of the National Legal Aid Advisory Board. In addition, other support to the implementation of the Legal Aid Act has had the effect of institutionalising approaches, structures, and professionalisation mechanisms, which will have significant ongoing impacts on the provision of legal services throughout Tanzania.

Furthermore, implementing ministries and institutions have indicated that their improved relationships have also become institutionalised, such as the LSF's ongoing partnership and coordination with MoCLA, and in some cases formalised.

The access to justice component's overarching objective will also likely be achieved, through the expansion, consolidation and professionalisation of the paralegal system in the country, and significant changes in mindsets and approaches of multiple stakeholders already being observed, and example of which is the significantly changed perceptions of the legal profession concerning the role of paralegals in the provision of access to justice.

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3.7 Added value

- *What has been the added value of the EU's contribution to anti-corruption and access to justice in Tanzania?*
- *How can the EU's added value be leveraged to support these issues in future?*

The financial scope of the programme is *ipso facto* an element of added value: few donors can match the size of the EU contribution in the rule of law sector in Tanzania. It is also observed that this aspect is significantly increased through the combined force of EU support with that of other donors, specifically with the UK relative to BSAAT, and Denmark relative to the LSF.

In addition to its capacity to support relatively large-scale programmes, the EU also benefits from having clear, public policy positions on support for the rule of law, the fight against corruption, security sector reform and other relevant domains. This, and the experience acquired in other countries, helps contribute to building trust with beneficiary institutions and other partners.

In relation to the contribution of technical expertise, the EU, the UK and Danida have been able to identify highly skilled advisors, whose credibility and expertise contributed to buy-in by beneficiary institutions (one example being the peer-to-peer support to the judiciary provided by the Slynn Foundation).

3.8 Cross-cutting issues

- *In what ways do each action's outputs and outcomes contribute to human rights, gender equality and social inclusion?*

Human rights, gender equality and social inclusion issues have not been addressed to the same degree by all three components of the programme – for example the LSF has a highly specific gender focus. The PE's and BSAAT's contributions to human rights and gender equality are more indirect, in the sense that these components focus on institutional capacity building and not (like LSF) on support for individual complainants. Despite this, the programme as a whole is explicitly mindful of each of these issues.

The programme's support for access to justice by definition contributes to the achievement of human rights, in the sense that it contributes to citizens – including vulnerable people – being better able to exercise their rights and/or seek redress for abuses and violations of their rights, in ways that would not be open to them without such a programme. The LSF component, by supporting training for paralegals, is also contributing to spreading human rights awareness among communities. BSAAT also contributes, if more indirectly, to the safeguarding human rights:

- Training for investigators, prosecutors and members of the judiciary helps ensure that these stakeholders are aware of, and implement, approaches that protect the rights of citizens, including defendants, whistle-blowers and witnesses. In that sense, it is important that all training and capacity building activities, including in relation to SOC, should continue to highlight the impact of large-scale corruption on vulnerable groups.
- Ultimately, by supporting the fight against SOC and large-scale corruption, the programme contributes to public safety and an end to impunity for perpetrators of major crimes, which is also a contribution to promoting and safeguarding human rights.

4 Conclusions

Relevance

The programme responds strongly to national, sector and institutional priorities and needs relative to the fight against corruption and access to justice, and is directly aligned with national policies and action plans in this regard, and related government initiatives. There is also strong relevance, coherence and synergy in the two components being conjoined in a single programme.

The Programme's response to needs could be strengthened by greater inclusiveness of certain relevant stakeholders, including the private sector, increased geographical scope to include Zanzibar, and a more explicit balancing of the institutional capacity to address corruption (the "supply side") with the needs and capacities of the private sector and civil society (the "demand side") in relation to anti-corruption efforts.

The alignment of the BSAAT component with government plans and approaches, especially in relation to Key Performance Indicators to be assessed across government department, could further enhance the relevance of the programme. However, it is important for the programme to avoid developing over-ambitious targets, which may not be achieved in the current implementation period. It will also be important going forward – possibly in the context of the planning of a future phase – to consider the continued relevance of working with nine institutional beneficiaries, as this carries the risk of engaging in activities not directly covered by performance indicators.

Coherence

The programme is very coherent; each component is based on a clear intervention logic and activities, outputs and expected outcomes are intertwined in a logical manner. It is important for LSF/MoCLA to maintain close coordination with other actors in the field, particularly those working with vulnerable groups. The BSAAT review has strengthened the programme's coherence. It will be important to prevent administrative bottlenecks.

Effectiveness

The Programme has been implemented in line with its objectives, results areas and indicators, with evidence of significant emerging results from both components.

The Programme has shown great flexibility and resilience in its handling of various constraints and uncertainties, including the Covid-19 pandemic, and has resumed and redoubled its activities. The development of a rapid response fund could be considered to increase Programme responsiveness.

The access to justice component has delivered results beyond its original targets, and with national scope, having stimulated ongoing discussion regarding reform, established paralegal desks, trained paralegals, and contributed to the operationalisation of key Legal Aid institutions. It has also demonstrated considerable reach and influence at the East African regional level. It has also been highly effective in establishing and consolidating qualitative relationships and partnerships, and contributed to improved coordination between MoCLA and the LSF, and other stakeholders.

Greater alignment between the mandate of the Office of Registrar of NGOs and that of the Registrar of Paralegal Services (MoCLA) would also increase effectiveness. Increasing the existing pool of paralegals, and creating specialised paralegal desks with corresponding training would further help address demand. Further support will also be required to ensure that regional legal aid coordinating committees acquire formal legal status

MoCLA does not have an adequate framework to monitor and evaluate implementation of the Legal Aid Act, in particular regarding the quality of legal aid services; this is an area requiring immediate attention.

The capacity of paralegals requires increased support, in particular relative to professionalism and reinforced skills, incentivisation through increased formalisation and recognition of paralegal courses, and reconsideration of the decision to discontinue Regional Mentorship Organisations, with the establishment of an alternative mentorship facility.

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Like its LSF/MoCLA counterpart, the BSAAT component is generally highly effective. While the pandemic caused delays in some activities, it did not derail the programme, and neither did the recent change in delivery modality – on the contrary, this change appears to have provided an opportunity to further streamline the programme and bring it more explicitly into line with government policies and implementation monitoring processes.

It is too early to say whether BSAAT will lead to a sustained increase in the identification of high-level corruption and other crimes as a result of improved investigation and prosecution capacity. However, early signs are encouraging and interviewees were of the view that each beneficiary organisation has improved its ability to discharge its duties. It remains that the results-based approach encouraged by the programme requires further changes in work methods, including digitalization of records, which are not yet implemented nationwide.

Efficiency

The programme is efficient in terms of the allocation of resources. It is also efficient in terms of programme management and accountability.

Further challenges concern the continued development of monitoring systems and the maintenance of coordination processes amongst beneficiary institutions.

Sustainability

There is a strong likelihood that sustainability will be achieved in terms of capacities built, institutional mechanisms established and professional relationships built and nurtured.

The Programme is linked to existing governmental structures and operations, such as legal aid desks, Legal Aid Week, and law enforcement mandates and operations.

A significant advantage of the PE is that it is embedded within the MoCLA Strategic Plan, and is co-financed through the Tanzanian national budget, with permanent employees.

The relevance of the Programme to the national and sector strategic framework is also a strong factor in support of the results' sustainability.

The sustainability of certain interventions is questionable, for example relative to pro-bono services. Further, there are inadequate formal linkages between existing legal aid services.

Active consideration is being given to the establishment of appropriate exit strategies.

Impact

Early evidence of impact relative to the access to justice component is observed, for example through the operationalisation of the Legal Aid Officer and Office of the Registrar, and of the National Legal Aid Advisory Board, and implementation of the Legal Aid Act, which has institutionalised approaches, structures, and professionalisation mechanisms. Improved relationships and coordination have also become institutionalised.

The access to justice component's overarching objective will likely be achieved, through the operationalisation of the paralegal system, and significant changes in mindsets and approaches.

Added value

The programme benefits from its substantial financial scope and from the combined force of EU support with that of other donors. In addition, the EU also benefits from having clear, public policy positions on support for the rule of law, the fight against corruption, security sector reform and other relevant domains.

Cross-cutting issues

Human rights, gender equality and social inclusion issues are explicitly addressed by the programme. Its support for access to justice contributes to strengthening citizens' ability exercise their rights. The BSAAT and SOC component contribute more indirectly to safeguarding human rights and gender equality, through institutional capacity building.

5 Lessons learnt

The Programme has highlighted a number of elements that provide and will continue to provide opportunities for learning for the EU, implementing parties, national partners and other stakeholders; these include the following:

- Since programmes such as LSF/MoCLA help strengthen access to justice, with a focus on vulnerable people, they also help to empower members of vulnerable groups and therefore help strengthen the rule of law and the legitimacy of government as a whole. In that sense, legal aid programmes can achieve impact beyond support to individual complainants.
- Capacity-building for paralegals, such as that undertaken by the LSF/MoCLA programme, should be an integral part of all legal aid programmes. Paralegals help channel legal awareness among local communities and play a major role in raising awareness of human rights among vulnerable people and groups. In that sense, paralegals can effectively become grassroots-level human rights defenders.
- The Programme Estimate constitutes an appropriate way to both help build the capacity of the government in the delivery of legal aid, and to enhance buy-in on its part. This is because the PE modality - in contrast for example to an external project management unit - is located within the government structure, strengthening the overall sustainability of the programme.
- It is essential to the relevance and effectiveness of an anti-corruption programme that it should be aligned with government priorities and supported at the highest level of government. This is the case in Tanzania: President Magufuli had made anti-corruption one of the key themes of election (and re-election) campaigns, and President Hassan has continued to emphasise this issue. The fact that the programme is coordinated from State House is a further indication of high-level support.
- It is essential to the effectiveness and sustainability of anti-corruption programmes that they should take a holistic approach, tackling all aspects of the fight against corruption - data collection, investigation, prosecution, trial, asset recovery, etc. The fact that the project encompasses the nine agencies dealing with high-level anti-corruption work in Tanzania is important in that regard, in that the programme fosters coordination and seeks to limit "silo" thinking in each institution. The risks to be managed in this respect are the dispersion of resources and the challenge of accountability in terms of cross-system KPIs. This risk can, to some extent, be mitigated by fostering common goals and work methods.
- While projects such as BSAAT are focusing on enhancing the "supply" side of the fight against corruption (i.e. institutional capacity to tackle major corruption, especially in relation to SOC and broad concerns such as human trafficking, transnational terrorism, etc.) it is important to build bridges to the "demand" side, including citizens' demand or expectation that their experience of "petty" corruption be addressed. One way to do this is to liaise with civil society organisations, the media and other opinion leaders to make clear that, by fighting high-level corruption, BSAAT and similar programmes may also contribute to fighting crime in general, thus strengthening public order and security.

6 Recommendations

General recommendations

- **Increased inclusiveness.** The Programme's response to needs should be strengthened by greater inclusiveness of certain relevant stakeholders, including the private sector, increased geographical scope to include Zanzibar, and the "supply side" of anti-corruption efforts.
- **Response mechanism.** The development of a 'rapid response fund' should be considered in order to increase Programme responsiveness in the event of crisis or serious constraints.

Recommendations concerning LSF/MoCLA

- **Institutional alignment.** The access to justice component should support efforts towards greater alignment between the Office of Registrar of NGOs and the Registrar of Paralegal Services. Further support is also required to ensure that regional legal aid coordinating committees acquire formal legal status.
- **Increased paralegal capacity and specialisation.** Paralegals should receive increased support to their capacities, in particular relative to professionalism and reinforced skills, incentivisation, and the establishment of an new mentorship and capacity-building facility. The access to justice component should also develop specialised paralegal desks with corresponding training, in order to address increased demand.
- **Stronger monitoring of reform progress.** MoCLA should develop a stronger monitoring and evaluating framework to follow the implementation of the Legal Aid Act, in particular regarding the quality of legal aid services.
- **Sustainability.** The sustainability of certain interventions should be reviewed and addressed, notably relative to the provision of pro-bono services, and formal linkages between legal aid services.

Recommendations concerning BSAAT

- **BSAAT Political Economy Analysis.** BSAAT was developed on the basis of a Political Economy Analysis dating back to 2015. In view of the changes in the political environment and of the crisis caused by the COVID-19 pandemic, it is recommended that the PEA be revised and updated to take account of progress to date in the fight against corruption, with a view in particular to further identifying avenues for government coordination and for involvement of the private sector in addressing corruption challenges. One element to consider further is BSAAT's contribution to the anti-poverty agenda.
- **Further involvement of the private sector.** BSAAT's original proposition included a business-facing component, dropped following two failed procurement rounds to appoint an implementing partner, leading to formal amendment in the Contribution Agreement in June 2021. The review team observes that, without a component explicitly addressing the private sector, BSAAT's current structure may be overly oriented towards institutional capacity building (the "supply side" of the fight against corruption) and recommends that BSAAT should consider incorporating a business-facing component (as representative of the "demand side").
- **Implications of the development of Key Performance Indicators.** BSAAT's pivot to re-focus on cross-system KPIs, coming at the request of senior leaders within State House, has the effect of increasing the ambition of the programme. This adjustment – which some beneficiary institutions have found to be disruptive – should continue to be pursued, in order for BSAAT to deliver meaningful results in line with government plans. In particular, the contribution of each of the nine beneficiary institutions to the delivery of KPIs should be reviewed, with a view to ensuring that BSAAT focuses on their delivery. BSAAT's recent re-focus on cross-system KPIs will require beneficiary institutions to collect and share data in the full spirit of openness and transparency. The review team recommends that the programme team adjust its ambition for data-led anti-corruption policy-making in view of this reality.

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- **Further steps to address vulnerable groups.** BSAAT's Serious Organised Crime component – with its substantive focus on child sexual exploitation and abuse, and child trafficking – should seek to enlist the expertise of relevant experts and civil society actors working with victims and survivors of such abuse, so as to incorporate a “demand side” element to its delivery.

Annexes

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Annex 1: Evaluation Matrix

Evaluation Questions	Judgement Criteria	Indicators	Sources
EQ 1: Relevance			
EQ 1.1: To what extent did IMPACT's design respond to Tanzania's needs, policies and priorities, including the achievement of the SDGs?	<p>JC 1.1.1: The two components were discussed with relevant stakeholders and authorities prior to finalisation.</p> <p>JC 1.1.2: The design and prioritisation of activities is consistent with the identified or expressed needs and constraints of relevant actors.</p>	<ul style="list-style-type: none"> - Programme design was objectively aligned with national strategic/ legislative frameworks, and the problems and needs of target groups. - Key stakeholders consider that programme design was aligned with such frameworks, problems and needs. - Number of stakeholders consulted - Evidence of consultations (meetings, etc.) - Evidence of stakeholder needs assessments - Evidence of integration of stakeholders' inputs in programme design. 	<ul style="list-style-type: none"> - Key Informant Interviews - Small Focal Group Discussions - Grant agreement/ contracts - Programme documentation (progress reports, workplans, etc.) - National strategy documents - National legislation - Internal and external reports/ analyses
EQ 1.2 Is it likely to continue to do so if circumstances change?	<p>JC 1.2.1: Programme design explicitly or implicitly allows for flexibility of activities and approaches.</p> <p>JC 1.2.2: Relevant actors demonstrate willingness to adjust programme activities where necessary.</p>	<ul style="list-style-type: none"> - Evidence of elements of flexibility in programme documents. - Stakeholders consider that the programme was sufficiently flexible in its design - Evidence of actors' willingness to adjust activities/ approaches. 	
EQ 2: Coherence			
EQ 2.1 To what extent are IMPACT's actions internally coherent; specifically, with each other & within each action's ToC?	JC 2.1.1: The two components reinforce and complement each other, in their internal logic, practical design, and implementation.	<ul style="list-style-type: none"> - The design of each component was objectively complementary and/or synergistic with the other, and shared common objectives. - Evidence of linkages between the components in the implementation of the actions. 	<ul style="list-style-type: none"> - Grant agreement/ contracts - Programme documentation

EQ 2.2: To what extent are IMPACT's actions coherent with EU, UK and Danish cooperation objectives, and with other interventions carried out by DPs and/or GoT?	<p>JC 2.2.1: The actions are aligned with EU, UK and Danish cooperation objectives, nationally, regionally and/or globally.</p> <p>JC 2.2.2: The actions are aligned with, reinforce and complement other interventions relative to anti-corruption and access to justice.</p>	<ul style="list-style-type: none"> - The programme's design and implementation are objectively complementary and/or synergistic with EU, UK and Danish cooperation objectives, and other relevant initiatives in the sectors. - Key stakeholders consider that programme design and implementation are complementary and/or synergistic with donor objectives, and with other initiatives. 	<ul style="list-style-type: none"> - Key Informant Interviews - Small Focal Group Discussions - Grant agreement/ contracts - Programme documentation - EU, UK, Danish country and regional strategy documents - Development partner strategies and programme documentation - Internal and external reports/ analyses
EQ 3: Effectiveness			
EQ 3.1; To what extent are IMPACT's actions effective, or likely to be effective, in achieving its objectives & expected results?	JC 3.1.1: The actions have, or are likely to have, contributed to the achievement of the programme's objectives and results, as expressed in the results frameworks (as adjusted), and reconstructed ToC.	<ul style="list-style-type: none"> - The programme outputs are being achieved in line with the programme indicators. - The programme objectives are being achieved in line with the original/adjusted indicators, and in the allocated timeframe. - Key stakeholders consider that programme outputs are being achieved, and likely to contribute to the objectives. 	<ul style="list-style-type: none"> - Key Informant Interviews - Small Focal Group Discussions - Programme documentation (progress reports, work-plans, etc.) - Internal and external reports/ analyses
EQ 3.2 How well has IMPACT responded to change?	<p>JC 3.2.1: Relevant actors adjusted programme activities and approaches in line with changes occurring within the general or sectorial context.</p> <p>JC 3.2.2: Such changes were consistent with the achievement of the programme's objectives and results.</p>	<ul style="list-style-type: none"> - The programme was adjusted in response to internal and external changes. - Key stakeholders consider that the changes were necessary, and will contribute to the achievement of the programmes objectives/ results. 	
EQ 3.3: What modifications should each action be taking to improve effectiveness?	N/A: Assessment of modifications of the actions that are likely to contribute to the Programme's outcomes.	- N/A	- N/A
EQ 4: Efficiency			
EQ 4.1: To what extent are IMPACT's costs proportionate to the benefits it has generated to date?	JC 4.1.1: Programme expenditure is in line with the original and/or adjusted workplans and budgets.	- The programme is controlling its resources according to the planned budget.	- Key Informant Interviews

	JC 4.1.2: Programme expenditure was appropriate relative to the outputs and outcomes achieved.	<ul style="list-style-type: none"> - The programme costs are objectively appropriate and proportionate to the anticipated outcomes. - Key stakeholders consider that programme costs are appropriate and proportionate. 	- Programme documentation (progress reports, workplans, budgets, etc.)
EQ 4.2: What factors are influencing any discrepancies?	N/A: Assessment of institutional, contextual and other elements that have impacted on Programme expenditure and efficiencies.	- N/A	
EQ 4.3: To what extent have the actions achieved results efficiently?	JC 4.3.1: The Programme outcomes have been maximised in line with the available resources.	<ul style="list-style-type: none"> - The overall costs of the programme are reasonable in proportion to the cost of outputs. - The programme was designed on the basis of internal or external benchmarks in order to achieve its benefits in a cost-effective manner - The activities are being objectively implemented in a cost-effective and efficient manner. - Key stakeholders consider that the programme costs are reasonable and the actions are being implemented in an efficient manner. 	
EQ 5: Sustainability			
EQ 5.1: To what extent are IMPACT's benefits, including structures, likely to continue/remain after the end of the programme?	<p>JC 5.1.1: Programme outcomes are likely to be sustained and developed in the medium to long term by partners.</p> <p>JC 5.1.2: Approaches, methods and/or concepts developed by the Programme are likely to be anchored/ institutionalised in partner institutions.</p> <p>JC 5.1.3: Resources and capacities are likely to be available to ensure the continuation of the outcomes achieved.</p>	<ul style="list-style-type: none"> - The programme directly incorporated sustainability in its design. - The programme results are objectively likely to be durable, stable and resilient in the long-term. - The programme is utilising tools and methods that promote sustainability (training of trainers, production of tools...) - The programme is facilitating an 'enabling environment' relative to the uptake and continuation of the programme results. - The programme is taking concrete steps to ensure that outcomes are 	<ul style="list-style-type: none"> - Key Informant Interviews - Small Focal Group Discussions - Grant agreement/ contracts - Programme documentation (progress reports, workplans, etc.)

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		<p>likely to be sustainable in the medium to long term.</p> <ul style="list-style-type: none"> - Programme approaches, methods and concepts are being anchored or institutionalised in partner systems. - Benefits are being used or developed by target groups and/or partners. - Adequate resources and capacities will be made available to ensure the continuation of the results achieved. 	
EQ 5.2: What key factors require attention in order to improve the prospect of sustainability of outcomes and the potential for replication/scale-up in Tanzania or elsewhere?	N/A: Assessment of institutional, contextual and other elements that are likely to contribute to Programme sustainability.	- N/A	
EQ 6: Early Signs of Impact			
EQ 6.1: To what extent are the intended and unintended outputs/outcomes being delivered by IMPACT's actions being translated into the desired impact?	JC 6.1.1: The Programme outcomes demonstrate evidence of contribution to changes in the target sectors, in line with the anticipated overarching impact.	<ul style="list-style-type: none"> - The intended impacts are realistic, given the context and resources at the time of programme design. - Key stakeholders consider that the intended impacts are realistic. - The programme activities, outputs and outcomes are objectively likely to contribute to the anticipated overarching impact. - Key stakeholders consider that the programme activities, outputs and outcomes are likely to contribute to the anticipated overarching impact. 	<ul style="list-style-type: none"> - Key Informant Interviews - Small Focal Group Discussions - Programme documentation (progress reports, workplans, etc.) - Internal and external reports/analyses
EQ 7: EU Added Value			
EQ 7.1: What has been the added value of the EU's contribution to anti-corruption and access to justice in Tanzania?	JC 7.1.1: The EU's contribution to anti-corruption and access to justice in Tanzania is in addition to the value that would have resulted from other interventions.	<ul style="list-style-type: none"> - Programme design ensured complementarity with other interventions, and actively avoided duplication. - Evidence exists of EU strategic, financial, technical and other contributions that are not provided by other interventions. 	<ul style="list-style-type: none"> - Key Informant Interviews - Small Focal Group Discussions - Grant agreement/ contracts - Programme documentation (progress reports, workplans, etc.)

EQ 7.2: How can the EU's added value be leveraged to support these issues in future?	N/A: Assessment and development of strategies/ recommendations relative to the maximisation of EU's added value.	- N/A	- Internal and external reports/ analyses
EQ 8: Cross-cutting Issues			
EQ 8.1: In what ways do each action's outputs and outcomes contribute to human rights, gender equality and social inclusion?	<p>JC 8.1.1: Cross-cutting issues were embedded in Programme design.</p> <p>JC 8.1.2: Cross-cutting issues are integrated/ mainstreamed into the actions' activities.</p>	<ul style="list-style-type: none"> - Cross-cutting issues are specifically incorporated into programme design and activities. - Rights based and gender sensitive approaches are being actively applied. - Key stakeholders consider that the programme design and implementation are adequately incorporating cross-cutting issues. - The programme is objectively contributing to results or impacts relative to cross-cutting issues. - Key stakeholders consider that the programme is contributing to results or impacts relative to cross-cutting issues. 	-

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Annex 2: Persons Interviewed

The following table provides a list of stakeholders that were interviewed during the evaluation.

Name	Function	Institution
	Serious Organised Crime Coordinator	British High Commission
	Consultant (Designing BSAAT SOC project)	UNDP
	BSAAT Coordinator	Programme Delivery Team, State House
	Programme Specialist – Access to Justice for Women	UN Women
	Consultant-Assessment of Paralegals	Lawyer
	Team Leader, Security and Justice	FCDO
	Focus Group Discussion (FGD)	Paralegal
	Technical Advisor	UNDP
	Monitoring and Evaluation Officer	Reaching Unreachable Tanzanians (RUT)
	Executive Director	Slynn Foundation
	Programme Manager	EUD Tanzania
	Executive Director	Tanganyika Law Society
	Director General	Zanzibar Anti-Corruption and Economic Crimes Authority (ZAECA), Zanzibar
	Accountant	FIU
	Criminal Justice Adviser	British High Commission
	Programme Director	DANIDA
	Focus Group Discussion (FGD)	Paralegal
	Focus Group Discussion (FGD)	Paralegal
	Program Officer	Ethics Secretariat
	Member, NLAAB	President's Office – Regional Administration and Local Government (PO-RALG)
	Umbrella organisation for LAPs	Civil society organisation
	Acting CEO	BRELA
	Senior Prison Officer	Tanzania Prison Services
	Justice, Court of Appeals (and Director of the Institute of Judicial Administration)	Judiciary of Tanzania
	IMPREST Administrator	Ministry of Constitutional & Legal Affairs
	BSAAT focal person	Financial Intelligence Unit (FIU)
	Retired Judge	Slynn Foundation
	Member (NLAAB)	MHOLA
	Programme Officer for Office of the National Authorising Officer (ONAO)	Ministry of Finance and Planning
	Officer	BRELA
	Accountant	BRELA

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Name	Function	Institution
[REDACTED]	Registrar of NGOs	Ministry of Health, Community Development, Gender, Elderly and Children
	PS to Chairperson	Ethics Secretariat
	BSAAT focal person	MoCLA
	Beneficiary of training	Legal Aid beneficiary
	Lawyer	UNICEF
[REDACTED]	Fraud and Money Laundering	National Prosecutions Service (NPS)
	National Coordinator , Tanzania Paralegal Network (TAPANET)	Paralegal/ Legal Aid Provider
	PE Project Officer	Ministry of Constitutional & Legal Affairs
	Deputy permanent secretary	Ministry of Constitutional & Legal Affairs
	Executive Director	Reaching Unreachable Tanzanians (RUT)
	Programme Coordinator	FCDO
	Legal Aid Registrar & Project coordinator	Ministry of Constitutional & Legal Affairs
	Accountant	BRELA
	Chairperson, Commission for Human Rights and Good Governance (CHRAGG)	National Human Rights Institution
	Senior State Attorney	National Prosecutions Service (NPS)
	Executive Director	Tanzania Women Lawyers Association
	Officer	Tanzania Police Force
	Lady Justice/ Judge of the High Court	Judiciary
	Chief Executive Officer	Legal Services Facility
	Director	Ministry of Constitutional & Legal Affairs
	CEO	Business Registration and Licensing Agency (BRELA)
	Legal Officer	Ministry of Home Affairs
	Senior Lecturer	Academia (University of Dar es Salaam)/ Commissioner National Electoral Commission (NEC)
	Director	National Prosecutions Service (NPS)
	Senior Manager	KPMG
	Officer	PCCB
	Director of Planning, Monitoring and Evaluation	PCCB
	Senior Planner & Investigator	
	Legal Officer	National Audit Office (NAO)
	Chairperson	Ethics Secretariat
	Consultant-Pro Bono work	Lawyer
	Focus Group Discussion (FGD)	Paralegal

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Name	Function	Institution
	Advocate (and BSAAT consultant)	KPMG Consultant
	Director	Good Governance Coordination Unit
	Director	Wajibu Institute
	Assistant Registrar & Secretary of the legal aid committee	Dar es Salaam
	Assistant Registrar & Secretary of the Legal aid Committee	Mwanza
	Chairman -Legal aid coordination committee	Mwanza
	Director Criminal Investigations	Tanzania Police Force
	Focus Group Discussion (FGD)	Paralegal
	Officer	BRELA

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Annex 3: Diagrams – Theory of Change & Intervention Logic

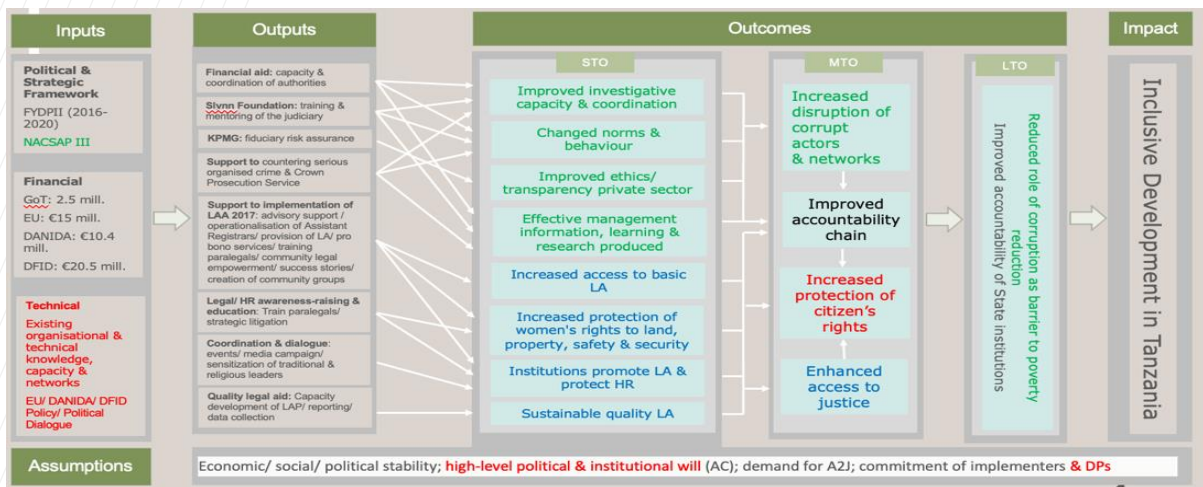
Legend:

- Green: Anti-Corruption Component
- Blue: Access to Justice Component
- Red: Inferred by evaluators from supporting documents

Original Theory of Change

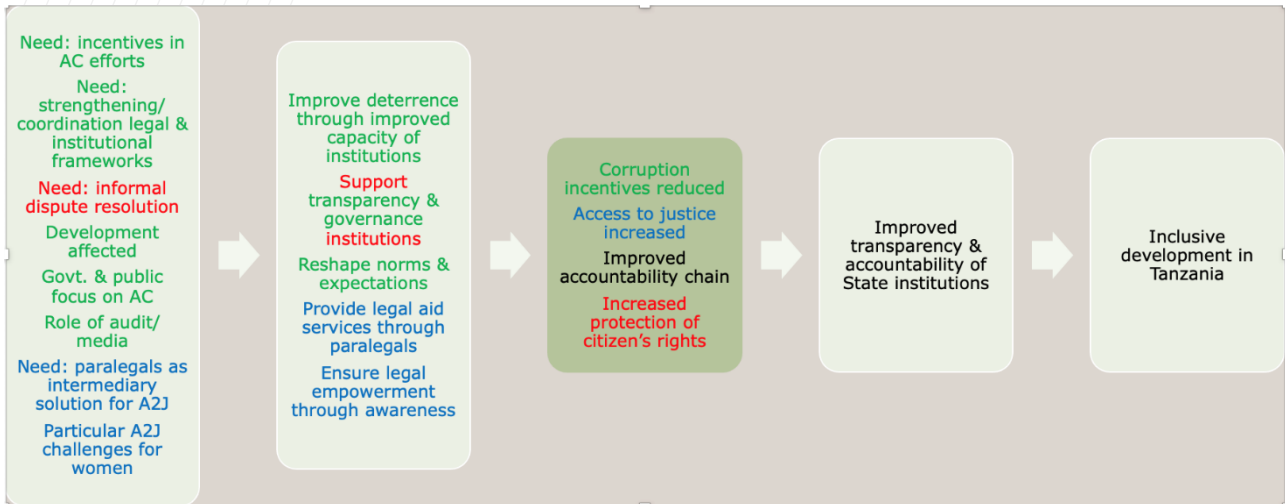


Original Intervention Logic

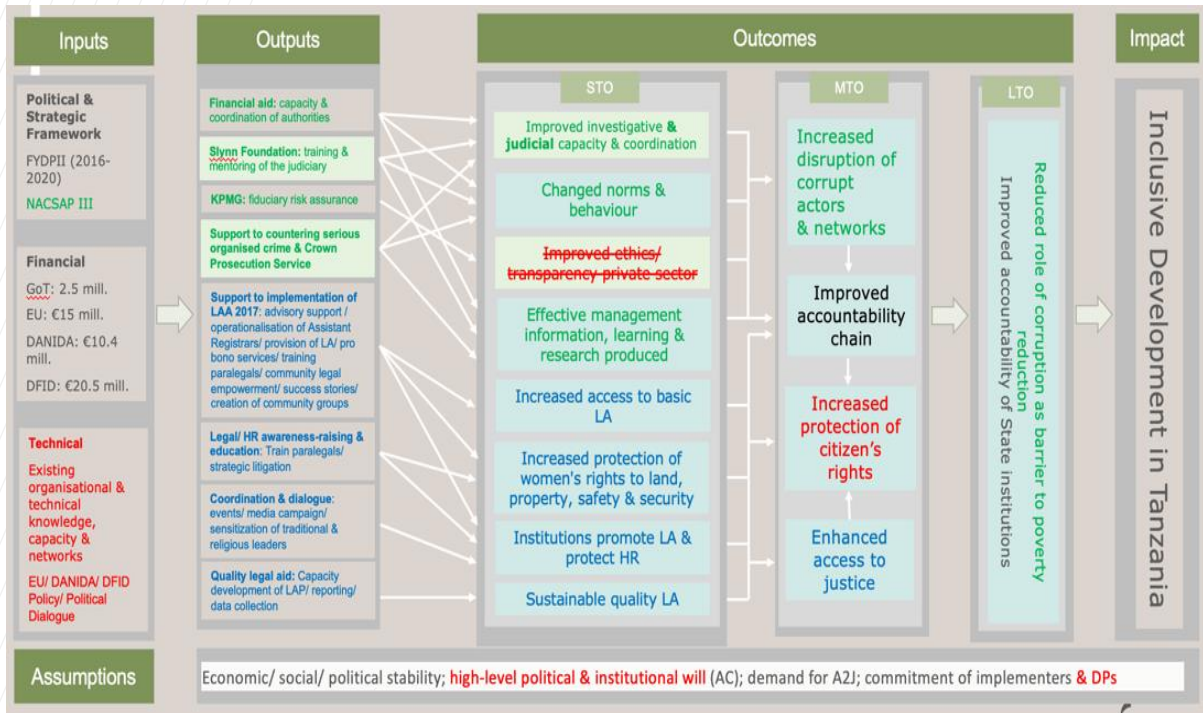


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Revised Theory of Change



Revised Intervention Logic



Annex 4: Documents Consulted

IMPACT Programme

- Action Document
- Financing Agreement
- Five Year Development Plan II
- Legal Aid Act 2017
- Legal Aid Regulations
- NACSAP I, II, III
- IMPACT LogFrame
- Logical Framework – Data Collection
- PE LogFrame
- Legal Aid Baseline – Zanzibar

BSAAT

- BSAAT Contract & Annexes
- Annual Workplans
- Annual Budgets
- BSAAT Logical Framework
- Annual Reviews
- Alternative Delivery Model, Proposal
- Approval Note
- Project Document
- MoU with Government
- Business Case – Summary Sheet
- Consolidated Results Framework
- DFID – CPS MoU and Programme Document
- FCDO – UNDP MoU
- Accountable Grant Arrangement Slynn Foundation

LSF

- LSF Contract & Annexes
- LSF Annual Reports 2016 - 2020
- Steering Committee Minutes
- Steering Committee Terms of Reference
- BISTO – Final Report
- Shivyawata Evaluation Report
- Shivyawata Final Narrative Report
- TLB Evaluation Report
- TLB Final Narrative Report
- Baseline Summary
- CHRAGG Assessment Report
- Draft Final Evaluation FGM Project
- Final Report of the Mid-Term Evaluation
- LSF Data Quality Report
- LSF Outcome Survey Report
- LSF Success Story Booklet
- Partner Evaluations (Kilimanjaro, Mbeya, Morogoro, Rukwa, Ruvuma, Tapanet, Unguja)
- Urban Legal Empowerment Evaluation
- Approval Note
- Audited Financial Report
- LSF Annual Narrative Report 2020
- LSF Annual Report 2019
- LSF Final Evaluation 2016
- Our Heroes 2019/ 2020

PE

- PE Contract & Annexes
- NLAAB Matrix
- Annexes
- Approval Note
- IMPACT Implementation Progress Report 2021
- Implementation Report 2019 – 2020
- Report on Capacity Assessment
- Expenditure Verification Report