November 2024

Transparency International

"Enhancing a Corruption Resilient Governance System in Georgia and Moldova by Strengthening Institutions and Empowering Civil Society as Actors of Change"

2024-2027

Abbreviations

CEC	Central Election Commission
CRRC	Caucasus Research Resource Centre
CSO	Civil Society Organisation
DANEP	Danish Neighbourhood Programme
DKK	Danish Krone
EU	European Union
EUN	Department of European Neighbourhood
HRBA	Human Rights Based Approach
IACC	International Anti-Corruption Conference
LNOB	Leave No One Behind
MEAL	Monitoring, Evaluation, Accountability and Learning
MFA	Ministry of Foreign Affairs of Denmark
NDI	National Democratic Institute
OECD	Organisation for Economic Co-operation and Development
ANC	Anti-Corruption Network
GRECO	The Group of States against Corruption
SEAH	Sexual Exploitation, Abuse and Harassment
SIDA	Swedish International Development Cooperation Agency
TI Georgia	Transparency International, Georgia
TI Moldova	Transparency International, Moldova
TI Secretariat	Transparency International Secretariat

1. Introduction

The present project document outlines the background, rationale and justification, objectives and management arrangements for development cooperation concerning the project "Enhancing a Corruption Resilient Governance System in Georgia and Moldova by Strengthening Institutions and Empowering Civil Society as Actors of Change" 2024 as agreed between the parties: Transparency International Secretariat (TI Secretariat), Transparency International Georgia (TI Georgia) and Transparency International Moldova (TI Moldova) and The Department of European Neighbourhood (EUN) of the Danish Ministry of Foreign Affairs (DMFA). The project document is an annex to the legal bilateral agreement between the TI Secretariat and DMFA and constitutes an integral part hereof together with the documentation specified below.

The project is planned for four years (2024 – 2027). An agreement is for one year (2025-2026) – subject to the approval of the Danish Parliament.

The project supports the activities of TI Georgia's Strategy (2021-2025) 'Reversing Georgia's institutional setbacks and stagnation' (the Strategic Plan). TI Georgia's main aim is to support building and empowering state institutions, develop good governance and the rule of law, ensure the transparency and direct accountability of the state institutions, support fair and democratic elections (including election observations), and protect universally recognized human rights. The project will also support pilot activities for TI Moldova to promote transparency, integrity and accountability in Moldova. The TI Secretariat's will provide project management and technical support to both chapters alongside its regional support to chapters in the European Neighbourhood region more broadly.

The project document outlines the background, rationale, justification, objectives, and management arrangements for the development cooperation, as agreed between the parties.

2. Context, strategic considerations, and justification

2.1 Country Context

Georgia

Once a country regarded to be the leader of the region in Western orientation, anti-corruption reforms and famously dabbed by a US president as a beacon of democracy, has undergone a vivid democratic backsliding and embraced the worst forms of state capture almost over a decade plunged into a kleptocratic and authoritarian rule by a narrow clique of people around the oligarch Bidzina Ivanishvili. High-level corruption, an opaque governance system, and the influence of informal networks on both state and non-state actors have been the main mechanisms of the rule but also an illustration of the true nature of challenges faced by the democratic system, which has been well-documented to be seen on the central as well as the local government level. The 2024, October 26 elections, and the manipulations conducted by the ruling party through the state powers and corrupt practices, once again have proven that the state is captured and the line between the state and the party is blurred.

Ironically, the process of backsliding was accelerated and exacerbated in the aftermath of December 2023 when the EU Commission and the Council granted the EU candidate country status to Georgia and invited the Government of Georgia to implement comprehensive reforms in 9 different directions of domestic and foreign policies and the institutional arrangement. The Government responded with the further worsening of Georgia's legislative framework and enhancement of anti-Western and anti-democratic rhetoric which after the start of Russia's invasion of Ukraine in February 2022 had become already quite noticeable.

In the spring of 2024, the political context further deteriorated with the initiation and adoption of the so-called Transparency of Foreign Influence Law, commonly dubbed the Foreign Agents' Law or the Russian Law, which was met by unprecedented protests in Georgia and huge outcry from the international community. In June 2024 the EU Council declared Georgia's EU integration process being de facto on hold. The US State Department proclaimed the two waves of the US visa restriction policy against dozens of Georgian officials and their families and reviewed all US-Georgia cooperation. There are already multiple cases of the US Department of Treasury designations of high-level officials on the basis of their involvement in serious human rights abuses and significant corruption.

In addition to the increasing reports of corruption and human rights abuses, the situation is complicated due to the lack of a proper checks and balances system. Especially problematic is the oversight function of the parliament, which, despite certain improved legislations, is not implemented effectively. At the same time, the role of the opposition and their powers are limited, weakening the overall influence of the parliament.

The situation on the local government level is concerning as well. The problems described above in relation to corruption and lack of checks and balances are especially acute on the local government level. The latest Decentralisation Reform has resulted in weak subnational public administrations that are unable to act independently from the central government, do not respond to citizens' needs and are prone to corruption.

The justice system in Georgia grapples with issues of inefficiency, to some extent a lack of independence politicisation, creating significant challenges. The absence of political will to fortify and depoliticize the justice system has hindered essential changes. Reforms to address shortcomings in the judiciary, law enforcement, and the prosecutor's office have been delayed for years. As a result, justice institutions are not functioning effectively to strengthen the rule of law and protect the rights of Georgians. Allegations of politically motivated investigations and high-profile criminal cases, along with claims of corruption within the judiciary, heighten the situation. The U.S. Department of State's public designations of Georgian judges in April 2023, citing significant corruption, serve as evidence of the problem. The European Commission, in its Communication on EU Enlargement Policy, which eventually led to the granting of the candidate status to Georgia, highlighted the need for comprehensive justice reform, including the introduction of a vetting system with international elements.

The Government's and the judiciary's reaction to the recommended reforms, especially the proposed vetting system, was openly disobedient. The formal and informal leaders of the judiciary, commonly referred to as the "judicial clan", launched an aggressive campaign against this proposal, citing infringement upon judicial independence and even an attack on national sovereignty. Such reactions clearly demonstrated the judiciary's and the political government's open refusal to implement any reforms of the justice system.

Georgia's media faces challenges, with instances of the ruling elites silencing journalists covering corruption. Despite Euro-Atlantic aspirations, pro-government outlets exhibit anti-Western patterns, aggravating political polarisation. The media, divided into pro-Western and critical versus anti-Western and government-aligned groups, plays a crucial role in shaping public opinion, especially during elections. Anti-Western sentiments, resembling Russian propaganda, raise concerns for the 2024 elections. Critical and pro-Western outlets face financial constraints, attacks, and smear campaigns, compromising media freedom and professional standards. Instances of SLAPP cases, violent attacks, and governmental interference warrant international attention, emphasising the precarious state of Georgia's media landscape.

Of particular concern is the fact that for many years, Georgia has faced difficulties in conducting high-quality democratic elections. In recent years, elections in Georgia have been characterised by issues such as vote buying, abuse of administrative resources, and a lack of trust in the Central Election Commission (CEC). However, the results of and the way how the parliamentary elections of October 2024 were held have raised serious questions about the legitimacy of the whole elections. We believe that elections were a perfect illustration of the state capture in action, where the ruling party used state institutions to provide targeted benefits to the voters, or if required use them for pressure and intimidation. The machinery of electoral manipulations that has subsequently been unveiled by investigative journalist groups based on the leaks of numerous whistleblowers, is largely based on the foundation of the scheme described by TI Georgia and ISFED in a joint study published in July 2022. This research presented a picture of well-organised efforts aimed at collecting massive volumes of personal information (including political preferences) of hundreds of thousands of voters, with the aim to identify their needs and vulnerabilities, months before the elections, with the aim to be utilised through targeted vote-buying and/or intimidation efforts closer to the election day. In these efforts, all state institutions and primarily law-enforcements have been found to be involved. So, the 2024 election day has proven for an 'upgraded' version of this system to be in place, where technologies (ruling party controlled cameras on the precincts, internal software to record the voter participation and call-centres to collect the information from the precincts), illegal money-flows, organised crime groups have been used along with the law-enforcement representatives for the purpose of influencing the will of voters, but also to be able to conduct electoral violations like voter carrousels and voting on others' behalf.

OSCE/ODIHR and other international election observation missions, as well as All credible local observer missions - TI Georgia, the My Vote Coalition and , ISFED and other local observation missions having reported multiple these and other serious irregularities in extremely high numbers, coupling with the heavily unfair pre-election environment, concluded that the election results failed to represent the will of the people of Georgia in the run-up to the election and before and on the eElection dDay. OSCE/ODIHR and other international election observation missions, though have not used the same harsh wording, enumerated many serious violations, but have not acknowledged the elections to be free and fair. The US Government and the EU have both refrained from acknowledging the elections to be free and fair (without claiming the opposite), and requested impartial investigation of all the allegations of serious violations drawn attention to the fact that the international observation missions have never said that the elections were free and fair and called on thorough investigation of all reported violations. The four opposition parties that have won seats in Parliament have stated that they will not take those seats and will not legitimise the rigged elections.

At the moment of writing this document the situation is still very much in development and it is clear that a comprehensive and sustained intervention is needed to try to reverse democratic backsliding, consolidate civil efforts to hold those responsible for mass electoral fraud accountable to the people of Georgia. Whatever the way the processes continue in Georgia - whether new elections are called, and conducted, and the country has a more pro-democracy and pro-European government, or the same government remains cementing their grip on power and further restricting civic an democratic space, the need for objective, non-partisan and professional watchdog activities will definitely remain and even further be required, therefore the substantiation for continuing the project activities is clearly and definitely present. However, the operating environment might be dramatically different based on the outcome of the process of challenging what we regard to be massively rigged and flawed election results and in the circumstances of negative scenario development the project aims and ongoing activities could require certain amendments.

This project recognises that no single organisation can tackle these complex issues in isolation and that a collaborative approach involving a wide array of democratic stakeholders is essential. In the absence of continued meaningful long-term intervention and watchdog monitoring efforts from civil society, the country will plunge further into political instability, isolation from the civilised world, economic decline, poverty and social injustice.

Moldova

The 2024 presidential elections and concurrent constitutional referendum in the Republic of Moldova revealed several instances of corruption, particularly at the level of local public administration. Reports from international observers highlighted significant concerns over the misuse of administrative resources. There were allegations of local officials using their positions to support certain candidates, undermining the fairness of the electoral process. Additionally, many cases of vote-buying were reported, with investigations pointing to government employees involved in such activities[1].

During 2023-2024, the Republic of Moldova made significant strides in justice sector reforms, focusing on enhancing judicial independence, combating corruption, and aligning with European standards. These reforms are critical for Moldova's path toward EU integration and address long-standing issues of judicial inefficiency and corruption. Legislative changes have been introduced to bolster the independence of the judiciary and prosecutorial bodies. This includes restructuring the Superior Council of Magistracy (CSM) and the Superior Council of Prosecutors (CSP). The new framework ensures these bodies are composed of a mix of career judges and civil society representatives, minimizing political influence and conflicts of interest. Notably, ex officio members, such as the Minister of Justice and Prosecutor General, were excluded from these councils to promote impartiality.

Despite these advancements, the reforms are still a work in progress. Delays in secondary legislation and resistance from within the system have slowed the implementation of some measures. Monitoring reports indicated that while a portion of the planned actions were completed successfully, others faced significant deficiencies or were still in progress. If, at the central level, major reforms are being made or underway in the field of anti-corruption prevention, at the local level, things change slowly in some areas, such as education, local public administration, and health.

Corruption in education, such as bribery for grades or admissions, perpetuates inequality. Students from wealthier families may have unfair advantages, while those from poorer backgrounds are marginalized. When teachers or administrators engage in corrupt practices, it compromises the quality of education. For example, if school funds are misappropriated, it can result in inadequate learning materials, poorly maintained facilities, and underpaid staff. One of the crucial bodies in the fight against corruption in the education sector is the Ministry of Education and Research. The Ministry launched a national program to combat and prevent corruption in 2024, and through this project, TI-Moldova will carry out activities aligned with the goals of the national program and contribute towards the promotion of integrity in the education sector.

2.2. Strategic Considerations and Justification

The project document is fully aligned with, and informed, by Denmark's revised Strategic Framework for the Eastern Neighbourhood region; Danish Eastern Neighbourhood Programme 2022-2026, which sets out the overall vision and strategic objectives for Denmark's engagement in the region. Specifically the project responds to the strategic objective on " Support reforms and

[1] https://www.osce.org/odihr/elections/moldova/578815

strengthening of the countries' democratic institutions and processes so that they can meet the EU admission criteria - including respect for human rights, an effective division of state power and strong independent control bodies, where a politically engaged population, an organised and independent civil society and free media can hold the authorities to account - and ensure inclusive societies with equality and recognition of diversity. Furthering the development of democracy and human rights; the development and consolidation of democratic societies with respect for human rights, effective tripartite separation of state power and strong independent control bodies, where a politically engaged population, an organised and independent civil society and free media can hold the authorities accountable – and ensure inclusive societies with gender equality and recognition of diversity.[2]

More specifically, the action falls under the specific objective with regard to Georgia on "fight against corruption and support to democratic institutions, and support to development of a sustainable civil society with particular focus on youth and a democratic culture [3], as defined in the Revised Strategic Framework: Denmark's partnership with the Eastern Neighbourhood Countries 2022-2026.

The proposed project is also highly relevant against the background of the aspiration for the European integration of Georgia and fulfilling the requirements set by The European Union (EU) for granting a candidate status to Georgia. Since its independence, Georgia has clearly expressed its European and Euro-Atlantic aspirations. The European ambition is included in the Georgian Constitution and is supported by the people of Georgia (75% of Georgians approve joining the EU[4]) and across the political spectrum. This has been a driver for several key reforms founded on European values and standards since the independence of the country.

On March 3, 2022, Georgia presented its application for membership to the EU in the context of Russia's war of aggression against Ukraine. On June 23, 2022, a decision by the Council of the European Union leaders endorsed the European Commission's recommendation to extend EU candidate status to Ukraine and Moldova. However, to Georgia, while recognizing its European Perspective, they set conditions to qualify for the same status in the future. To get the candidate status, Georgia would have to fulfil a number of conditions established by the European Commission including reducing political polarisation, implementing reforms to strengthen the independence of the judicial system, and bolstering anti-corruption efforts[5]. The Commission monitors Georgia's progress to address these priorities. On November 8, 2023, the European Commission recommended granting the status of a candidate state for EU membership to Georgia[6]. However, the European Commission took this decision with nine conditions remaining to be fulfilled.

The proposed intervention areas for this current project document works in support of the strategic objective of Denmark's Strategic Framework for the Eastern Neighbourhood region and will also serve support and complement the spirit of the EU candidacy conditions to advance

[2] Revised Strategic Framework: Denmark's partnership with the Eastern Neighbourhood Countries 2022-2026, October 2023 p 23.

[3] Revised Strategic Framework: Denmark's partnership with the Eastern Neighbourhood Countries 2022-2026, October 2023 p 46.

[4] National Democratic Institute (NDI) and Caucasus Research Resource Centre (CRRC) survey" Taking Georgians' pulse - Findings from August 2022 face to face survey", September 2022. https://www.ndi.org/sites/default/files/Poll%20Results%20%28English%29_0.pdf , https://www.ndi.org/publications/ndi-poll-eu-remains-destination-choice-vast-majority-georgians-disenchantment

[5] Commission Opinion on Georgia's application for membership of the European Union, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL AND THE COUNCIL, Brussels, 17.6.2022
COM (2022) 405 final. https://neighbourhood-enlargement.ec.europa.eu/opinion-georgias-application-membership-european-union_en

[6] https://neighbourhood-enlargement.ec.europa.eu/news/commission-adopts-2023-enlargement-package-recommends-open-negotiations-ukraine-and-moldova-grant-2023-11-08_en

Georgia's democratic and rule of law agenda through meaningful and targeted political, judicial, and anti-corruption reforms.

3. Project Objective

The overarching goal of this project is to enhance Georgia and Moldova's resilience against corruption, strengthen democracy, promote separation of powers and good governance throughout the country by empowering civil society, youth and media to act as change agents, promoting European integration, and advocating for crucial reforms, with a special emphasis on the local government level.

The development objective of the development cooperation among the parties is to bolster state institutions that empower the people, foster good governance, and uphold the rule of law. To achieve this, TI Georgia aims to ensure the transparency and accountability of state institutions through a sufficient level of decentralisation, checks and balances, support for fair and democratic elections, promotion of actors from the media, civil society organisations (CSOs), and non-governmental organisations (NGOs), and safeguarding universally recognized human rights. Specifically, the main objective of the project is: *"Reducing opportunities for corruption through transparency, accountability and integrity in key institutions".*

TI-Moldova will continue the activities started in 2024 and will train school managers in the country, through the district education departments, about elements of corruption including the use of administrative resources, conflict of interest and bribery in schools.

This project will help to prevent corruption and increase integrity in education at the local level. The experience from 2024, when TI-Moldova trained over 700 managers of educational institutions in schools, showed us that by cultivating a culture of integrity, enhancing public trust, and mitigating the risks of electoral corruption, such an initiative would not only strengthen Moldova's democratic processes but also support its long-term socio-economic development and European integration aspirations in the long term. Schools play a pivotal role in civic education, informing students and their families about the electoral process, their rights as voters, and the importance of participating in free and fair elections.

3.1 Cross cutting priorities

Reflecting Danish Policy Priorities, policies, as well as the concrete challenges to be addressed by the project, TI Georgia will mainstream a number of priorities to shape the design and implementation[7]:

Youth: For political systems to be inclusive and diverse, they must include all parts of society, including young people. Young people in Georgia have traditionally constituted a large group of society that is disillusioned with political leadership and marginalised from mainstream politics. Young people's low public trust and engagement in politics means that their interests and voices are mostly left at the side lines. TI Georgia will work to ensure that young people can become catalysts for positive change, contribute to building a culture resilient to corruption and be at the forefront of securing democratic spaces. To this end, the project will integrate youth components in all possible activities during the planning and implementation phases.

[7] TI Moldova will decide during the pilot phase how to and to what extent to address the listed cross-cutting priorities.

Gender: TI Georgia will aim to incorporate a gender dimension into all of its activities. Research and monitoring actions will aim, among other things, to identify any negative trends in the relevant areas with regard to gender, while the resulting advocacy interventions will be designed to rectify the situation. Meanwhile, TI Georgia's training and capacity-building actions will incorporate a gender component during the planning and implementation phases.

Environment: There is a growing awareness of and concern over environmental problems throughout Georgian society. Corruption in public administration (especially in management of natural resources through licences and privatisation) is a major factor that has had a negative impact on the environment. TI Georgia will aim to facilitate positive changes in this area by identifying and publicising any relevant cases of misconduct and proposing recommendations for greater transparency, accountability, and integrity in the process of adoption of decisions with environmental consequences.

Marginalisation: Corruption tends to have the most significant negative effect on vulnerable groups (including people living below the poverty line) as it diverts resources away from social programs or results in mismanagement of the resources already allocated for those programs. TI Georgia's efforts to reduce corruption in public administration and to increase government accountability will therefore contribute to more effective policies toward reducing poverty and focus on LNOB. Additionally, low-income population groups are among the primary beneficiaries of TI Georgia's free legal aid programme again with a LNOB lens, as well as of the organisation's efforts to aid the process of land registration in rural areas. Media-driven Anti-Western narratives contribute to the heightened stigmatisation of vulnerable groups, especially minorities.

Human Rights Based Approach: TI Georgia will integrate human rights both as a lens for its overall objectives and outcomes, as well as in its implementation through a focus on participation, accountability, non-discrimination, and transparency in the management, partner, and stakeholder relations of the project.

4. Theory of change and key assumptions

TI Georgia

TI Georgia's overall strategy works towards Georgia as a country that is free of corruption in all areas of public life. Corruption is seen to arise primarily from the lack of transparency and accountability in government and therefore promotion of transparency and accountability is considered the most fundamental element of anti-corruption efforts. Central to the programme is the understanding that corruption cannot be defeated through narrowly focused law enforcement work. It is necessary to reduce the opportunities for corruption through well-designed preventive measures. TI Georgia's approach and associated ToC are based on Transparency International's theoretical framework of the National Integrity System which is defined as a set of institutions (both state and non-state) that all play an essential role in enhancing a country's resilience against corruption. According to this framework, successful fight against corruption is impossible unless institutions such as the executive branch, the legislature, the judiciary, the media, the civil society, the private sector, and others are characterised by high levels of independence, transparency, accountability, and integrity.

Reflecting this, the project's ***Theory of Change*** is that ***IF*** *legislative framework, institutional capacities and civic awareness for meaningful anti-corruption efforts are strengthened,* ***AND IF*** *the capacity of citizens living in regions to engage in citizen-responsive local governance is empowered and supported,* ***AND IF*** *parliamentary effectiveness for oversight is strengthened,* ***AND IF*** *the justice system strengthens its independence and transparency,* ***AND IF*** *the pluralistic, competitive and fair elections held,* ***AND IF*** *the capacity of media to watchdog the cases of corruption is empowered and supported,* ***AND IF*** *foreign malign influence and disinformation are identified and*

countered, ***THEN*** *there will be higher awareness of corruption instances and thus opportunities for corruption will be reduced, democracy will be strengthened, and citizen participation will be increased.*

The objectives and actions proposed under this project are based on the assumptions that a monopoly of decision-making power, formation of informal collusive networks influencing main decisions taken by the Government, lack of judicial independence, extreme politicisation of state institutions and the lack of government accountability are the main obstacles to Georgia achieving further progress in anti-corruption and public administration reforms. These major shortcomings of the political system (rather than specific flaws of anti-corruption policy) can be considered as the primary cause of persistence of complex forms of corruption (and other types of abuse of power).

Several steps outlined in the 9 recommendations issued by the European Commission on November 8, 2023 are directly addressed by this project, which include addressing political polarisation, ensuring the fairness of elections, particularly in the context of the upcoming 2024 parliamentary elections, enhancing institutional independence and impartiality within the country, improving parliamentary oversight, implementing judicial reform, combating corruption, promoting de-oligarchization, safeguarding human rights, minority rights, media, and civil activists, and actively countering disinformation, foreign information manipulation, and interference related to the EU and its values.

Reflecting the ToC the project will support interventions towards the following outcomes:

Outcome 1: Reduced opportunities for corruption (including high-level corruption) in the executive branch;

Outcome 2: A more transparent, accountable, and citizen-responsive local governance;

Outcome 3: Increased transparency, accountability, and integrity in Parliament, its effectiveness as an oversight institution and a branch of power counter-balancing the Executive;

Outcome 4: More pluralistic political system through greater transparency and accountability in political parties and more competitive and fair elections;

Outcome 5: Empowered rule of law, judicial independence and access to justice of underrepresented communities;

Outcome 6: Increased independence, professionalism, and investigative activities of journalists to empower media as an anti-corruption watchdog;

Outcome 7: Raised awareness on matters regarding a reform agenda which will reduce opportunities for corruption and strengthen democracy and citizen participation.

In realising these outcomes, the project will support interventions such as:

<u>Outcome 1:</u>

- Conducting evidence-based comprehensive research and monitoring of the anti-corruption governance system to identify shortcomings and areas for improvement in compliance with the international commitments/requirements;
- Advocating for necessary legal and institutional reforms supported by evidence-based studies to strengthen anti-corruption measures through utilising anti-corruption reforms support platforms like OGP, OECD/ACN, GRECO, EU 12 Priorities, National Anti-Corruption Strategy, and PAR among others;

- Developing/improving tools (companyinfo.ge; tendermonitor.ge; politicaldonations.ge) for identifying, reporting, and tracking corruption within the public sector;
- Raising public awareness about the detrimental impact of corruption on society, with a particular focus on young people, underrepresented and marginalised groups;
- Enhancing the capacity of civil society organisations with a special focus on municipal level actors, including media, NGOs, and youth activists, enabling them to identify and report on corruption effectively.

Outcome 2:

- Expanding the Council of Concerned Citizens to enhance youth participation and coverage in marginalised and minority areas, ensuring a more inclusive representation in the decentralisation process;
- Conducting evidence-based assessments of Municipal Councils' performance and oversight functions, provide recommendations and advocate for improvement;
- Monitoring the spending and distribution of municipal budget resources, advocating for good governance practices, including program budgeting;
- Monitoring municipal-level anti-corruption systems, identifying and reporting instances of corruption and conflicts of interest in local government activities, and advocating for tailored anti-corruption reforms at the municipal level.

Outcome 3:

- Conducting an evidence-based assessment of the Parliament's performance, particularly regarding its anti-corruption oversight role, and advocate for improvements, performance of the various councils of The Parliament (E.g. Gender Equality Council, Ethics Council, Council of open Parliament, etc.);
- Advocating for the openness and accountability of the Parliament and facilitating citizen/stakeholder engagement with the parliament and the legislative process;
- Monitoring the legislative process and producing analytical publications on important draft legislation.

Outcome 4:

- Monitoring and reporting on elections at both national and local levels, covering irregularities in the pre-election period as well as on and after election day. This includes focusing on issues such as black money in politics, abuse of administrative resources, intimidation, vote-buying, confiscation of ID cards from voters to enable third persons to vote instead of the owners of ID cards, election administration's intentional or negligent failure to perform their duties enabling thereby large-scale electoral fraud;
- Developing and publishing interim and final reports on elections, inclusive of overall description of electoral proceedings and in-depth analysis/assessment of the elections based on the international standards of free and fair elections. Publishing and bringing the reports to the attentions of domestic and international stakeholders and general public by means of the organisation's website and social media platforms, as well as broadcasting, print and online media and direct communications;
- Following up electoral irregularities in election administration and courts, reporting on the outcomes of election disputes;
- Advocating for relevant electoral reforms based on monitoring results;
- Raising voter awareness about the electoral process throughout the country.

Outcome 5:

- Monitoring of justice system institutions to identify shortcomings, exposing undue influences and advocate for changes through specific recommendations;
- Exposing corruption risks, legal loopholes, and systemic weaknesses through regular risk assessments and reporting;
- Providing free legal aid and awareness raising activities, with a special emphasis on underrepresented communities in regions, ensuring access to justice for those with limited resources and in need, including NGOs;
- Building legal precedents through strategic lawsuits in Common Courts, Constitutional Court, and European Court of Human Rights.

Outcome 6:

- Monitoring and reporting on the state of the Georgian media environment and advocating for legislative improvements;
- Promote journalists' and their sources' rights: Provide free legal assistance to safeguard the rights of journalists' and their sources (whistle-blowers included) rights, protect them from the undue interference and uphold freedom of expression;
- Support investigative journalists by coordinating anti-corruption activities and equipping media professionals with advanced tools and methodologies to enhance their investigative practices in researching and exposing corruption.

Outcome 7:

- Serving as a knowledge base for international partner organisations and institutions, facilitating their support for a democratic reform agenda – which might also be supported by Georgia's Euro-Atlantic integration;
- Providing citizens with information about necessary reform efforts;
- Advocating for measures to raise public and institutional awareness about the importance of media literacy and the threat posed by mis- and disinformation.

TI Moldova

To effectively promote transparency, integrity, and accountability at the local level and within the education system, TI-Moldova will conduct activities as part of a long-term project aimed at preventing corruption. This initiative will continue the mission from the year 2024 to strengthen anti-corruption measures and build a culture of ethical governance.

This project will help to prevent corruption and increase integrity in the education sector at the local level. TI-Moldova will monitor the National Anti-Corruption Plan in the field of education to ensure that the strategies outlined in the plan are implemented correctly, holding educational authorities accountable for their actions. Activities started in 2024 will continue to support and promote sustainable anti-corruption policies in the educational system and create systemic public demand for independent, effective, and efficient anti-corruption in educational public integrity institutions. The Program has two main objectives:
Objective 1: To contribute to improved transparency, efficacy, and efficiency of the operation of anticorruption in the education field, both among institution managers and among pupils.
Objective 2: To empower Moldovan civil society and local media to promote increased civic activism and to monitor and report on public integrity, corruption, and institutional abuses in schools.

Project Activities:
Activity 1: TeacherIntegrityEDU workshop (20 persons involved)

In 2025, parliamentary elections will be held in the Republic of Moldova. From the experience of the presidential elections in the fall of 2024, several managers of educational institutions have used administrative resources in an electoral context. In this context, TI-Moldova proposes that in the summer of 2025, before the parliamentary elections, to train 20 heads of district education departments, a workshop at which they will be informed about the integrity of the educational system during an election year. Participants will be selected according to the size of the districts. In turn, these participants, according to the trainer of trainers scheme, will organize such workshops in districts for managers of schools. This training helps maintain the neutrality and professionalism of the education system, which is crucial for a fair and democratic electoral process.

Activity 2: Pupil Integrity (EDU)action – SummerCamp- integrity literacy activity in 15 localities
TI-Moldova aims to reach 15 camps across the country, which will be attended by about 650 students. The workshop will be facilitated by a young person trained in the field of anti-corruption, a student at the Faculty of Law. The trainer will be guided by a TI-Moldova expert. These activities serve as an effective way to educate young people about the values of integrity, transparency, and accountability, which are essential for fostering a culture of ethics in less formal environment where anti-corruption education can be presented in a fun, engaging, and memorable way. This includes activities like team challenges, quizzes, and interactive workshops that make the learning process enjoyable.

Activity 3: Teacher Integrity trainings – in 20 localities
In addition to the 12 districts (600 school managers) that were covered during 2024, TI-Moldova aims to cover the remaining 20 districts in 2025, so that all school managers in villages and cities know how to prevent acts of corruption in the education system. With this activity, about 800 school managers from across the country will be trained.

Activity 4: Grants for local NGO – 2 grants
TI-Moldova will provide two grants to local non-governmental and media organizations, which will monitor anti-corruption policies at the local level.

Activity 5: Monitoring the Sectoral Anti-Corruption Plan in the field of education for 2024
The Sectoral Anti-Corruption Plan[8] in the field of education for 2024 in Moldova is part of Moldova's broader strategy to combat corruption across various sectors, and the education sector is particularly vulnerable due to its direct impact on the youth and future of the country. The Sectoral Anti-Corruption Plan includes specific actions, policies, and reforms aimed at reducing corruption in the education sector. However, from the experience of other similar documents approved in Moldova, the implementation of such policies is not always effective. Monitoring will help identify gaps between policy and practice, ensuring transparency in the use of educational resources and it will also allow for timely interventions and adjustments to the plan, increasing its effectiveness. After monitoring, a report will be published and available for public use. TI Moldova will also present it to the Ministry of Education and Research with recommendations that will contribute to broader anti-corruption efforts across the country.

TI Secretariat
TI Secretariat will provide overall project management and oversight for this grant, alongside technical support to TI Georgia and TI Moldova more specifically, but also chapters in the European Neighbourhood more broadly. Through regional advisory support, the TI Secretariat will provide technical support and advice to chapters on advocacy priorities and approaches related

[8] https://mec.gov.md/sites/default/files/plan_sectorial_anticoruptie_0.pdf

to how to further countries' resilience against corruption, strengthen democracy, and promote separation of powers and good governance, which will also support EU Enlargement and other developments in the region. The TI Secretariat will provide civic space and security support, both through publications and statements, as well as security needs assessments and trainings, including digital security, as requested by chapters in the region. The TI Secretariat will also participate with chapters in relevant regional and global anti-corruption meetings to advance TI's regional and global advocacy priorities and partnerships as well as internal events such as the annual Europe and Central Asia regional meeting and Political Integrity Bootcamp to further exchange knowledge and amplify and coordinate programme of work more effectively among chapters in the region.

5. Summary of the results framework

For results-based management, learning and reporting purposes Denmark will base the actual support on progress attained in the implementation of the project as described in the documentation. Progress will be measured through TI Georgia's monitoring framework focusing on a limited number of key outcomes and corresponding outputs and their associated indicators.

A summary of the results framework for "Enhancing a Corruption Resilient System in Georgia by Strengthening Institutions and Empowering Civil Society as Actors of Change" is presented below:

Project	Enhancing a Corruption Resilient Governance System in Georgia by Strengthening Institutions and Empowering Civil Society as Actors of Change.
Project Objective	Reducing opportunities for corruption through transparency, accountability, and integrity in key institutions.
Impact Indicator	Reduced opportunities for corruption in the public sector based on a number of recommendations advocated by civil society reflected in governmental action plans and alleged corruption cases exposed by TI Georgia.

Outcome 1		Reduced opportunities for corruption (including high-level corruption) in the executive branch	
Outcome indicator		Number of alleged high level corruption cases identified, and submissions made to relevant investigative bodies	
Baseline	Year	2021-2022-2023	- 150 alleged cases of high-level corruption have been identified and referred to relevant investigative bodies
Target	Year	2024-2027	- At least 150 new high level corruption cases identified and referred to investigative bodies
Outputs		1.1 Key anti-corruption policy shortcomings identified and all stakeholders and the public informed about them 1.2 Investigations into corruption-related violations by public officials conducted 1.3 Existing anti-corruption investigative online tools maintained and updated 1.4 Compliance of Georgian Government with international commitments monitored 1.5 Citizen awareness about corruption, its various forms and consequences improved	
Output indicators		*- Number of policy analysis papers published* *Baseline: 1 in 2023 Target: at least 1 in 2025*	

		- Number of monitoring/investigation activities on violations related to areas such as public procurement, privatisation of state-owned property, extractive licences, construction permits, subsidies and other government programs, as well as violations related to integrity, asset declarations and conflict of interest of public officials *Baseline: 10 in 2023 Target: at least 10 in 2025* *- Number of existing anti-corruption tools maintained and updated* *Baseline: 3 in 2023 Target: 3 in 2025* *- Number of consultations with international partners* *Baseline: 1 in 2023 Target: at least 1 in 2025* *- Number of corruption related social media posts and media outreach activities* *Baseline: 10 in 2023 Target: at least 10 in 2025*	
Outcome 2		A more transparent, accountable, and citizen-responsive local governance	
Outcome indicator		Communities informed and empowered on integrity, transparency and accountability of local governance	
Baseline	Year	2022-2023	- 9 publications
Target	Year	2024-2027	- 10 publications
Outputs		2.1 Investigations into corruption and conflict of interest related violations by local government public officials identified 2.2 Local Councils' capacities to monitor and provide oversight of the municipal executive government, and decentralisation process increased 2.3 Strengthening and enabling citizen participation in local governance affairs through the Councils of Concerned Citizens (CCC), including for minority and marginalised communities	
Output indicators		*- Number of blogs on significant possible corruption and conflict of interest related violations* *Baseline: 5 in 2023 Target: at least 6 in 2025* *- Number of reports on performance of local councils and decentralisation process* *Baseline: 4 in 2023 Target: at least 4 in 2025* *- Number of members of the Councils of Concerned Citizens retained* *Baseline: 50 in 2023 Target: 50*	
Outcome 3		Increased transparency, accountability, and integrity in Parliament, its effectiveness as an oversight institution and a branch of power counter-balancing the Executive	
Outcome indicator		Number of parliamentary performance tracked and publicly reported Number of instances of potential corruption/conflict of interest identified and reported Effectiveness of parliamentary mechanisms in oversight tracked and publicly reported	
Baseline	Year	2021-2022-2023	- 3 reports - 1 reports - 3 reports
Target	Year	2024-2027	- 4 reports - 1 reports - 3 reports
Outputs		3.1 Assessment and recommendations on improvement of important draft laws are provided and advocated to the Parliament 3.2 Information on parliamentary performance is tracked	

		3.3 Possible instances of corruption/conflict of interests in MPs' business interests and asset declarations are monitored and reported 3.4 Recommendations/legislative proposal on the improvement of anti-corruption mechanisms and parliamentary oversight	
Output indicators		*- Number of blogs on assessment of draft laws* *Baseline: 5 in 2023 Target: 4 in 2025* *- Number of annual reports on Parliamentary performance* *Baseline: 1 in 2023 Target: 1 in 2025* *- Number of publications/blog posts on alleged instances of corruption/conflict of interest among MPs* *Baseline: 0 in 2023 Target: 1 in 2025* *- Number of recommendations / legislative proposals related to Parliamentary control, improvement of legislation, related to the anti-corruption mechanism* *Baseline: 2 in 2023 Target: 1 in 2025*	
Outcome 4		More pluralistic political system through greater transparency and accountability in political parties and more competitive and fair elections	
Outcome indicator		Number of election precincts monitored Number of pre-election violations identified and acted upon	
Baseline	Year	2023	- N/A [no elections were held in 2023] - N/A [no elections were held in 2023]
Target	Year	2024-2027	- As many election precincts are monitored as may be feasible - Pre-election violations identified and reported
Outputs		4.1 Pre- and post-election processes are monitored and findings reported to the public 4.2 Election day developments are monitored and violations revealed by static and mobile observers, violations are litigated in relevant election commissions and courts 4.3 Raised voter awareness about the electoral process throughout the country	
Output indicators		*- # of reports on pre and post-electoral processes* *Baseline: N/A* [no elections were held in 2023] *Target: 1 in 2025* *- # of reports on election day developments* *Baseline: N/A [no elections were held in 2023] Target: 1 in 2025* *- # of voters educational campaigns held (E.g. awareness raising, social media posts, video clips filmed and disseminated to inform citizens about their rights and existing electoral problems, etc.)* *Baseline: 0 Target: at least 1 in 2025*	
Outcome 5		Empower the rule of law, judicial independence and access to justice of underrepresented communities	
Outcome indicator		The number of national media coverage on findings and recommendations issued by TI Georgia following the monitoring process. The number of references to TI Georgia's reports/findings on challenges in national courts, prosecution service and other justice sector agencies referenced in Georgian media and social media platforms, reports of other CSOs and researchers, as well as the reports of international monitoring bodies or organisations (OECD, US State Department Report, Monitoring bodies of the Council of Europe and the European Union)	
Baseline	Year	2021-2022-2023	- 4 media sources

			- Authoritative reports of international organisations and partner states 4
Target	Year	2024-2027	- At least 4 media sources - Reference in at least 4 authoritative reports
Outputs		5.1 Systemic shortcomings and/or corruption risks are exposed at the justice system institutions and relevant assessments and recommendations provided 5.2 Strategic litigation cases are identified and lodged annually at the Supreme Court and, when necessary, with the ECtHR 5.3 Citizens and NGOs provided with free legal consultations	
Output indicators		*- Number of reports/blogs on assessing systemic challenges and/or corruption risks at justice system institutions* *Baseline 2023: 0 Target: at least 1 in 2025* *- Number of cases lodged at the courts* *Baseline 2023: 125 active cases Target: at least 20 in 2025* *- Number of strategic cases launched at the Supreme Court and ECtHR* *Baseline 2023: 5 Target: at least 1 in 2025* *- Number of free legal consultation sessions to citizens and NGOs* *Baseline 2023: At least 200 Target: at least 200 consultations in 2025*	
Outcome 6		Increased independence, professionalism, and investigative activities of journalists to empower media as an anti-corruption watchdog	
Outcome indicator		Number of media outlets or journalists adopting TI Georgia's investigative tools or methodologies	
Baseline	Year	2021-2023	- At least 5
Target	Year	2024-2027	- At least 5
Outputs		6.1 Violations of journalist rights are identified and protected through advocacy and litigation 6.2 Investigative journalists supported, anti-corruption activities of journalists in the regions coordinated 6.3 Media reports/statements/blogs are published and studies disseminated	
Output indicators		*- Number of cases on journalists' rights identified, protected and litigated* *Baseline: 60 in 2023; Target: at least 5 in 2025* *- Number of investigative journalists supported through consultations/trainings/workshops, information / data sharing* *Baseline: 5 in 2023 Target: at least 5 in 2025* *- Number of reports/blogs/statements prepared and published* *Baseline: 20 in 2023; Target: at least 20 in 2025*	
Outcome 7		Raised awareness on matters regarding a reform agenda which will reduce opportunities for corruption and strengthen democracy and citizen participation	
Outcome indicator		Awareness raising activities/campaigns with active public and civic engagement fostering good governance and democratic reforms	
Baseline	Year	2021-2022-2023	- At least 10 awareness raising campaigns/activities
Target	Year	2024-2027	- At least 10 awareness raising campaigns/activities
Outputs		7.1 Georgian citizens receive accurate information and actively engage in the country's democratic process and democratic reform agenda	

Output indicators	*- Number of awareness raising or informational campaigns/activities on violations of corruption, democratic reforms, good governance, citizens' participation and threat posed by mis- and disinformation, promotion of the democratic values* *Baseline 2023: 2 Target: 10 in 2025*

6. Risks management

The risk matrix covers the project support to TI Georgia only, as the risk matrix specifically for Moldova will follow the pilot phase.

Risk Factor	**Likelihood**	**Impact**	**Risk response**
The geopolitical situation in Georgia could escalate, impacting civil society operations, donor relationships, and public sentiment toward Western-aligned projects.	Medium	High	Develop contingency plan for operational adjustments and operate from the Transparency International Georgia registered in Estonia.
Do not have media or civil society cooperation.	Low	Medium	Work within existing civil society coalitions to ensure support for the work TI Georgia is implementing, build on relationships with media forged through other projects to ensure media involvement and reporting on organisation's work.
Low interest from the government and Parliament to reflect and participate in the discussions of the project's activities.	High	Medium	Continued dialogue with government officials and parliament; leverage on the TI Georgia representation in parliament.
Impacts are not reinforced and therefore not sustained.	Medium	High	Collaborate with other organisations working to improve governance to reinforce the findings and changes implemented as a result of TI Georgia's work. Work closely with government partners to encourage sustainable solutions to identified issues.
Public campaigns, oversight and monitoring is insufficient to influence government actions.	Medium	Medium	Focus where there are opportunities for change, and where the government itself is interested in change. Where issues that do not have government buy-in, identify allies inside and outside of government to encourage an appetite for change.
Large-scale election fraud may discourage voters and turn them more apathetic.	High	High	Enhancement of public awareness raising efforts, discovery of more rigging tools and mechanisms and holding those responsible for the election fraud accountable to the voters will encourage the voters to mobilise themselves for greater civil activism to defend democracy.
Programmes currently being implemented by other parties/donors are unsuccessful in judicial reform (transparency and depoliticisation).	High	High	If the judicial branch is not capable of supporting accountability and transparency, then work to improve the other branches of government will be significantly weakened. Continue working together with other partner NGOs and CSOs as well as independent media to disclose more politically motivated rulings of the courts as well as corruption and nepotism in the judicial sector.
Programmes currently being implemented by other parties/donors are unsuccessful in improving impact evaluation and policy development.	Low	Medium	On-going monitoring of the environment and other programmes to identify weaknesses and react to them.

Enactment of the Foreign Agents' Law and forcing TI Georgia to dissolve itself because of heavy monetary penalties imposed on it	High	High	TI Georgia has established a back up NGO with the same name in Estonia. If TI Georgia Tbilisi has to dissolve, TI Georgia in Estonia will take over and continue its operations.
Political capture of media outlets.	Medium	Medium	The growing plurality in media is unlikely to be entirely reversed. This risk will continue to be monitored and if it becomes a greater concern, a mitigation strategy will be developed.
Fatigue of volunteers and community members, reducing their engagement in monitoring, advocacy, or governance activities.	Medium	High	Increasing awareness activities through various means of communication.
Low trust of citizens towards CSOs and low interest to participate in CSO activities	Medium	High	The project activities on promoting constituent accountability will help CSOs to establish close relations with their constituents.
Insufficient TI Georgia staff capacity to conduct research, advocacy, and capacity development	Low	High	Improved HR systems to manage staff and capacity appropriately. Hire appropriate new staff when needed and develop current staff capacity where necessary. Seek for additional non-project funding to increase the sustainability of the organisation in the short to medium term.
Limited possibility of conducting trainings and in-person meetings.	High	High	Project activities will focus on utilising online tools where feasible, with the option to reschedule or postpone activities when necessary.

7. Budget

The Danish grant is to be spent solely on activities leading to the expected outcomes as agreed between the parties. TI is responsible for ensuring that the funds are spent in compliance with the agreement and with due consideration to economy, efficiency and effectiveness in achieving the results intended. The budget for 2026-2027 will be agreed on in Q3 2025.

Organisation	**Danish MFA Contribution for project activities**				**Total**
	2024 (DKK)	2025 (DKK)	2026 (DKK)	2027 (DKK)	DKK
TI Georgia (project funding)	3,950,000	3,950,000	tbc	tbc	tbc
TI Moldova (pilot activities)	375,000	375,000	tbc	tbc	tbc
TI Secretariat (technical advice)	347,898	347,898	tbc	tbc	tbc
Overhead (7%)	327,102	327,102	tbc	tbc	tbc
Total	**5,000,000**	**5,000,000**	tbc	tbc	tbc

As for the 2025 overall budget indicated above, TI Georgia submitted an outcome-based project budget to EUN for approval, specifying the distribution of funds between outcomes under the seven outcome areas.

8. Grant Management and Reporting Arrangement

This grant will be centrally managed by the TI Secretariat, responsible for liaising between the parties, managing overall risks to progress and assuring consistent quality - including the common implementation of best practice standards and organisational compliance with defined Danish/donor 'red line' policies e.g., anti-corruption measures, safeguards against child labour and sexual exploitation, abuse, and harassment (SEAH). The TI Secretariat would also lead on identifying and implementing opportunities for peer dialogue and learning, monitoring overall progress and co-ordinating and synthesising consistent and high-quality reporting across all parties. For reporting purposes, TI Secretariat would be the main point of contact with the donor.

The TI secretariat will forward narrative and financial reporting according to the grant agreement. This will consist of an aggregate executive summary report synthesising the high-level achievements of each partner, alongside the annual report and financial report for TI Georgia (indicating distribution on use of Danish funds on outputs under the seven overall outcomes) and high-level summary report for TI Moldova and TI Secretariat on its activities.

The TI Secretariat will organise a coordination meeting with the donor and parties once a year, to review progress and direction, identify areas for learning and share insights and opportunities, and explore the value of any reviews that may take place during the period of the grant. The TI Secretariat would be responsible for organising these meetings and ensuring that agreed changes are documented and followed-up with the relevant parties. In addition, TI Georgia will invite the DFMA to attend its bilateral annual meeting with representatives from the Swedish International Development Cooperation Agency (Sida) to engage in a detailed discussion concerning project results and achievements.

The Ministry of Foreign Affairs of Denmark shall have the right to carry out any technical or financial supervision mission that is considered necessary to monitor the implementation of the project. After the termination of the project/programme support, the Ministry reserves the right to carry out evaluations in accordance with this article. Any mission or evaluation requested by the Ministry of Foreign Affairs of Denmark will be coordinated with the TI-S Grant Manager in line with TI-S MEL policies and quality control procedures.

TI Georgia will initiate a meeting with the TI Secretariat at the end of Q1 2025 to discuss the post-election period and how the situation in Georgia is impacting or other considerations for the work to continue into the second half of the year. Based on that discussion, project activities and budget will be revised, and priorities for the next six months will be adjusted as necessary.