

Applicant: **Fenner, Gretta**
Organisation: **Basel Institute on Governance**
Funding Sought: **£520,097.67**

IWTR8S2\1026

Empowering Malawi's government agencies to control wildlife crime related corruption

The Basel Institute/Lilongwe Wildlife Trust (LWT) project tackles environmental crime in Malawi by combining Basel's anti-corruption and LWT's wildlife and forestry crime expertise. Where corruption has already been committed, the project supports the Anti-Corruption Bureau to sanction it through investigations and prosecutions that target the traffickers' finances and assets. To stem the onslaught of more corruption, the project strengthens the resilience of internal risk management systems of the Departments of National Parks and Wildlife, Forestry and Police.

PRIMARY APPLICANT DETAILS

Name Gretta
Surname Fenner
Organisation Basel Institute on Governance
Website (Work) [REDACTED]
Tel (Work) [REDACTED]
Email (Work) [REDACTED]
Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CONTACT DETAILS

Title Mr
Name Juhani
Surname Grossmann
Organisation Basel Institute on Governance
Tel (Work) [REDACTED]
Email (Work) [REDACTED]
Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Section 1 - Contact Details

PRIMARY APPLICANT DETAILS

Name Gretta
Surname Fenner
Organisation Basel Institute on Governance
Website (Work) [REDACTED]
Tel (Work) [REDACTED]
Email (Work) [REDACTED]
Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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Tel (Work) [REDACTED]
Email (Work) [REDACTED]
Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

GMS ORGANISATION

Type	Organisation
Name	Basel Institute on Governance
Phone	[REDACTED]
Email	[REDACTED]
Website	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Section 2 - Objectives, Species & Summary

Q3. Title:

Empowering Malawi's government agencies to control wildlife crime related corruption

What was your Stage 1 reference number? e.g. IWTR8S1\1001

IWTR8S1\1116

Q4. Which of the four key IWT Challenge Fund objectives will your project address?

Please tick all that apply. Note that projects supporting more than one will not achieve a higher score.

- Ensuring effective legal frameworks and deterrents
- Strengthening law enforcement

Q5. Species project is focusing on

Where there are more than four species that will benefit from the project's work, please add more boxes using the selection option below.

Elephant	Rhinoceros
Pangolin	Timber

Do you require more fields?

- No

Q6. Summary

Please provide a brief summary of your project, its aims, and the key activities you plan on undertaking. Please note that if you are successful, this wording may be used by Defra in communications e.g. as a short description of the project on the website.

Please write this summary for a non-technical audience.

The Basel Institute/Lilongwe Wildlife Trust (LWT) project tackles environmental crime in Malawi by combining Basel's anti-corruption and LWT's wildlife and forestry crime expertise. Where corruption has already been committed, the project supports the Anti-Corruption Bureau to sanction it through investigations and prosecutions that target the traffickers' finances and assets. To stem the onslaught of more corruption, the project strengthens the resilience of internal risk management systems of the Departments of National Parks and Wildlife, Forestry and Police.

Section 3 - Title, Dates & Budget Summary

Q7. Country(ies)

Which eligible host country(ies) will your project be working in? Where there are more than four countries that your project will be working in, please add more boxes using the selection option below.

Country 1 Malawi	Country 2 No Response
Country 3 No Response	Country 4 No Response

Do you require more fields?

- No

Q8. Project dates

Start date:

01 July 2022

End date:

30 June 2024

Duration (e.g. 2 years, 3 months):

2 years

Q9. Budget summary

Year:	2022/23	2023/24	2024/25	2025/26	Total request
Amount:	£181,556.20	£279,411.16	£59,130.31	£0.00	£ 520,097.67

Q10. Proportion of IWT Challenge Fund budget expected to be expended in eligible countries: %

Q11a. Do you have matched funding arrangements?

Yes

What matched funding arrangements are proposed?

We will be leveraging existing in-country funding from both partners, including (for Basel): Project funds from FCDO's TSOC and USAID, and IWT core funding from the Principality of Liechtenstein, and (for LWT): funding from the Wildcat Foundation and the Paul Allen Family Foundation for proactive enforcement against wildlife trafficking, and US INL for programming.

Content-wise, this will include: leveraging the wildlife-related Corruption Risk Assessments and the internal control unit evaluations funded by USAID; the investigative journalism and corruption prevention system work and the Political Economy Analyses conducted by the FCDO funded TSOC program; oversight and management capacity funded by Liechtenstein; and the media training and tracking and the Wildlife Crime Information System database funded by US INL.

Q11b. Total confirmed & unconfirmed matched funding (£)

Q11c. If you have a significant amount of unconfirmed matched funding, please clarify how you fund the project if you don't manage to secure this?

For years 2023-24 and 2024-25, we have listed the annual core donation from the Principality of Liechtenstein as "unconfirmed," as these funds are allocated on an annual basis. We are confident that the allocations will continue through the remaining project years, but should they not, we will be able to provide matched funding from relevant project sources, such as our FCDO-funded TSOC Malawi programme.

Section 4 - Problem statement & Gap in existing approaches

Q12. Project stage

With reference to the application guidance, please select the relevant project stage.

Main

Q13. Problem the project is trying to address

Please describe the problem your project is trying to address in terms of illegal wildlife trade and its relationship with poverty. Please describe the level of threat to the species concerned. Please also explain which communities are affected by this issue, and how this aspect of the illegal trade in wildlife relates to poverty or efforts of people and/or states to reduce poverty.

Please cite the evidence you are using to support your assessment of the problem (references can be listed in your additional attached PDF document).

In 2016, Malawi was identified by CITES as a country of “primary concern” for ivory trafficking. This has triggered positive change, including the passing of the National Parks and Wildlife (Amended) Act in 2017, which provides for prison sentences of up to 30 years.

The law is being used: From 2017 to 2020, LWT recorded a total of 357 IWT sentences, 255 of which for offences related to Listed Species, with a custodial sentence rate of 91% and an average sentence of 4.8 years. In 2021, Lin Yun Hua, a Chinese national and kingpin of a criminal syndicate which had been operating in Malawi, received a 14 year sentence for possession, 14 years for dealing in rhino horn, and six years for money laundering.

This was a landmark case. While it showcases that Malawi continues to suffer from significant wildlife trafficking, the money laundering sentence, so far a heavily overlooked offence in IWT prosecutions in Malawi, holds significant potential. Corruption levels in Malawi continue to be high, and money laundering prevention continues to be too weak. This helps IWT thrive.

Corruption allows criminals to evade justice at every stage of the enforcement chain. And so they can carry on with their illegal business without significant risks. Internal corruption in wildlife agencies is challenging on many levels: pay disparities and discretionary allowances, and the exposure of certain positions (e.g. at border posts) to highly lucrative criminal opportunities carry inherent corruption risks. A third corruption risk arises from the fact that the agencies frequently operate a quasi-regulatory function over the utilisation of natural resources.

Corruption that enables wildlife crime affects the weakest segments of the population most severely: It allows ringleaders to evade sanctions while those lower down the food chain bear the brunt of enforcement actions. It distorts donor programs that are designed to reduce poverty around the parks. The leakage of state funds diverts resources away from conservation, speeding up environmental degradation and thereby reducing economic opportunities and increasing hardship for the poor. Corruption in the forestry sector, enabled by weak policing, allows rapid deforestation in pursuit of cooking charcoal production, used by 97% of Malawian households.

The challenge presented by corruption which is enabling wildlife crime can, and needs to be turned into an opportunity, and this is increasingly recognised in Malawi as the Lin case illustrates. Addressing financial crime as a critical enabler of IWT syndicates holds great potential to hit the syndicates at the heart of their operations, namely their profits.

To address corruption within agencies, internal controls and a culture of openness to addressing misconduct must be introduced. These lead to a change in attitude and will produce tangible intelligence for corruption investigations. These investigations, especially by ACB and MPS, must go beyond traditional wildlife and forestry crime investigation and include, indeed prioritise, financial intelligence and asset tracing. That way they can replicate the recent Lin case that reached the core rather than the syndicate’s periphery.

Q14. Gap in existing approaches

What gap does your project fill in existing approaches? Evidence projects should describe how the improved evidence base will be used to design an intervention and the gap the intervention will fill. Extra projects should also provide evidence of the intervention’s success at a smaller scale.

The successful prosecution of the Lin network has been called “perhaps the most significant case that there’s been in Africa.” (NYT). Malawi’s authorities are fiercely trying to bring down other, non-IWT criminal networks in other cases against top-level government officials.

Yet, so far we see little if any crossover cases: no corruption charges have been levied against even the biggest traffickers

or colluding public officials; IWT enforcement remains largely concerned with possession and dealing despite indication of widespread corruption. Sentences are too short and confiscations too small to have a serious deterrent effect. This missed opportunity to catch the ringleaders, remove public officials from positions of influence, and deprive all of illicit profits, has challenges in two main areas:

Enforcement–ACB is committed to prioritising IWT/corruption investigations. But it currently lacks technical expertise to investigate such cases. In addition, the case pipeline is almost empty because a culture of impunity in concerned agencies hinders reports and internal complaints of wrongdoing.

Prevention–Our recent Corruption Risk Assessment (CRA) found wildlife agencies unable to prevent internal corruption. The National Anti-Corruption Strategy-II requires agency-specific corruption prevention workplans, but these are yet to be formulated and Integrity Committees do not yet play a significant role.

Section 5 - Objectives & Commitments

Q15. Which national and international objectives and commitments does this project contribute towards?

Consider national plans such as NBSAPs and commitments such as London Conference Declarations and the Kasane and Hanoi Statements. Please provide the number(s) of the relevant commitments and some brief information on how your project will contribute to them. There is no need to include the text from the relevant commitment.

London Declaration (2014)

- Action B-X and XII: project supports LE by analysing information and evidence via financial investigations that target the organisers of IWT and supports zero tolerance policies that target IWT-associated corruption.
- Action C–XIII, XV, and XVI: project supports wildlife enforcement bodies by upgrading financial network analysis skills, building prosecutorial skills and strengthening institutional resilience against corruption.

Kasane Statement

- Action A–5: The project supports law enforcement by analysing evidence and building capacity to effectively prosecute financial crimes associated with IWT.

London Declaration (2018)

- Items 10, 12, and 14: project involves financial investigation, strengthening anti-corruption activities associated with IWT.

Malawi Constitution: "...accord full recognition to the rights of future generations by means of environmental protection..."

Malawi's National Wildlife Policy (2018) envisions developing, reviewing and implementing 'a strategy for anti-corrupt practices and proper conduct'. This is not yet the case, but we will help DNPW achieve this.

National Parks and Wildlife (Amendment) Act 2017 provides for charges on e.g. possession and trade of a government trophy, but also for recovery of assets associated with these crimes, which this project will help enforce.

Malawi Law Enforcement Coordination Strategy: 6.1.2 on parallel financial investigations in criminal cases. 6.7. importance of asset forfeiture

Malawi National Anti-Corruption Strategy II (NACS II): 1.2: Reduce discretionary space, 4.1.7 require each agency to spend 1% of budget on preventing corruption. 2.: decreasing corruption in internal systems through systemic reviews, mainstreaming prevention, promoting ethics and whistleblowing, modify SOPs to reduce corruption.

Section 6 - Method, Change Expected, Gender & Exit Strategy

Q16. Methodology

Describe the methods and approach you will use to achieve your intended Outcome and contribute towards your

Impact. Provide information on:

- How have you reflected on and incorporated evidence and lessons learnt from past and present activities and projects in the design of this project?
- The need for this work and a justification of your proposed approach.
- How you will undertake the work (materials and methods).
- How you will manage the work (roles and responsibilities, project management tools, risks etc.).

The Basel Institute is implementing IWT088 and IWT092 on financial investigations and asset recovery in IWT. LWT delivers a comprehensive 'Wildlife Justice Project', supported by IWT064/IWT094. We will build on lessons from these and from IWT022/043/096, which focus on capacity building of LEAs. We combine these lessons learned into the following success factors:

a) Robust political will: Malawian Presidential commitment and support of Directors of key agencies to combating IWT and corruption is unique for the region.

b) Strong trust-based relationships between partners and beneficiaries: Basel (through FCDO-funded TSOC program) and LWT (15 years partnering with Malawi LEAs) bring substantial networks and relations as well as corruption/financial crime, IWT and local knowledge; the project will 'hit the ground running'.

c) Parallel approach of enforcement and prevention: Building on the recommendations from our recent research on corruption in IWT in Malawi, we are combining financial crime/corruption live case work with a strong corruption prevention component to increase sustainability.

d) Build on Malawi's case law and legislation: The notorious 2021 Lin-Zhang case will be a focus for transferring key success factors to other financial crime cases. In addition, the project will mobilise the use of Malawi's provisions on illicit enrichment charges, which are highly appropriate for IWT cases and provide for a very direct route for asset confiscation, but are unused as yet in IWT corruption.

e) Scaling: the entire program has the scaling-up perspective hard-wired. Our team leader, trained in the Scaling Up Methodology, will ensure that activities are structured toward scaling up, subject to additional funding, in two ways: a) apply the same approach to more cases in Malawi, b) export the model to other countries in the region.

1. Financial crime and corruption case work

Theory of Change: Analysis of Lin-Zhang syndicate network cases and support for financial and corruption investigations on live cases => review cases to augment them in line with ACB requirements => promote uptake of cases at ACB (with TSOC help) => money laundering and corruption cases are more robust and successfully prosecuted, three cases are significantly progressed.

LWT will utilise its Wildlife Justice Project (court monitoring/co-prosecution) and extensive project database to provide information across the justice chain on potential financial and corruption cases. Basel's financial advisor will cooperate with LEAs to progress these cases, building on a solid understanding of the Lin network prosecution. We will also draw on the expertise that TSOC has generated by "ringfencing" a specialist team representing the ACB, FIA, MPS, and DoF to pursue corruption and money laundering cases.

2. Corruption prevention programme

Theory of Change: Building better understanding of IWT corruption mechanisms within beneficiary agencies --> designing and implementing systems to decrease IWT corruption opportunities --> mitigation measures make IWT corruption more challenging --> IWT corruption costs increase --> economic utility to engage in IWT corruption and therefore IWT decreases.

Our approach is based on Basel's USAID-funded Political Economy Analysis, Corruption Risk Assessment, and Internal Controls Assessment for Malawi, with a specific focus on wildlife crime (2022). Encouragingly, both the Department of Forestry and DNPW have shown great interest in participating in the corruption risk assessment work.

The project will be led by Basel's Green Corruption programme Team Leader, who is experienced with IWTCF through IWT088 and IWT092. Field-based advisors will report to him and liaise with Basel and LWT's in-country teams. They will be supported by the Programme Officer and draw on additional HQ and field technical expertise from both partners.

Project delivery will be done by two full-time technical advisors:

a) Financial Investigations and Corruption Advisor, a financial investigator with legal strategy expertise, likely recruited from the region or internationally (but with regional experience). S/he will work and partner with LWT's and stakeholder investigators and prosecutors to augment big IWT cases with financial crime and corruption charges (bribery, illicit enrichment, money laundering, embezzlement, tax crimes, etc).

b) The Corruption Prevention Advisor will work with beneficiary agencies to strengthen the internal resilience and minimise opportunities for corruption. S/he will be from Malawi, with a solid understanding of government mechanisms and corruption risk mitigation.

Enforcement Activities:

- 1.1 Deliver case-based training for LE agencies to detect and investigate financial crime and corruption in IWT.
- 1.2 Review historical cases for corruption indicators, potential to re-open cases.
- 1.3 Active major financial and corruption cases supported.

Prevention Activities:

2. Develop Corruption Prevention Action Plans
3. Implement strengthened internal controls systems in beneficiary agencies.
4. Establish a Corruption Prevention Task Force within the Inter-Agency Committee on Combatting Wildlife Crime (IACCWC)

Q17. Capability and Capacity

How will you support the strengthening of capability and capacity in the project countries at organisational or individual levels, please provide details of what form this will take and the post-project value to the country.

Our capacity building concept combines three approaches - personal mentoring, structured training and systems building - that have proven to be highly effective in jointly leading to maximum sustainability:

On enforcement, mentoring will take place throughout the program and follows a practice built for almost two decades, including with DFID/FCDO funding: a "learn while doing" approach to build financial investigation capacity of LEA personnel. Embedded advisors develop cases jointly with partner agency staff, thereby simultaneously building successful asset recovery cases (e.g Malawi in the Mchakulu case, Peru recoveries of over USD 50 million from Fujimori regime) and developing long-term in-house capacity.

Formalised training will take place at the outset of the program and include in-person training of investigators in financial, asset recovery, money laundering, and corruption investigations. These trainings would be fully customised to Malawi and built on training modules delivered previously by this project's partner agencies and other organisations such as RUSI.

Finally, mentoring and training provide unique insight into systemic weaknesses, as they are understood from the practitioner's perspective rather than through academic analysis only. Likewise, introducing systemic changes, in practice, policy or even law, are most effective if their effectiveness can be showcased in practice. Looking out for such gaps and anchoring solutions thereto through mentoring will thus be an inherent component of the project.

On the prevention side, we will deliver formal training on Corruption Risk Assessments and risk mitigation. Our Advisor will then work with responsible partner agency staff to develop corruption assessments jointly and, based on these, develop procedures and regulations that are less vulnerable to corruption. To ensure buy-in and effective implementation the process will also involve working closely with partner agencies' leadership and responsible units, including internal audit, HR, finance, etc.

Q18. Gender equality

All applicants must consider whether and how their project will contribute to reducing inequality between persons of different gender. Explain how your understanding of gender equality within the context your project, and how is it reflected in your plans.

Research shows that men benefit primarily from IWT, while male-dominated criminal networks that exploit natural resources also reproduce negative masculinities and exploit women. Malawi's court cases confirm a male-dominated IWT sector. Between 2017-2020, when considering binary gender norms, defendants were predominately male. Of the 506

defendants recorded, only 15 were female - 12 were involved in Listed Species related cases and 5 of the 12 were foreign nationals. In 2020, of 52 cases of alleged offences under the Forestry Act, 27% of defendants were female.

Corruption is well-documented to affect women and girls disproportionately as they are under-represented in the power structure that leverages its position for corrupt ends. This decreases the likelihood that a gender-sensitive perspective will be part of policy-making. Malawi's National Gender Policy (2015) commits to mainstream gender issues in natural resources and environmental management to ensure sustainable use. However, women's lower degree of access to corrupt networks means that they suffer the full negative effects of corruption undermining public services, while receiving few of the benefits of informality, patronage, and illicit flows of resources.

By making enforcement action more effective to expose and disrupt male-dominated corrupt IWT networks, the project expects to contribute to reducing further exploitation of vulnerable women and girls. Women remain severely under-represented in law enforcement, so we are committed to seeking a gender-balanced team of mentors in the expectation that a female advisor can not only break through masculinities inherently present in current law enforcement practice but also serve as a role model for other aspiring female law enforcement officers. While challenging, given the significant predominance of male applicants for positions, this balanced approach has proven valuable in our other two IWT CF programs.

To remain on track, the Logframe features gender-disaggregated indicators on training and mentoring for law enforcement officers.

Q19. Change expected

Detail the expected changes to both illegal wildlife trade and poverty reduction this work will deliver. You should identify what will change and who will benefit, considering both people and species of focus a) in the short-term (i.e. during the life of the project) and b) in the long-term (after the project has ended).

When talking about how people will benefit, please remember to give details of who will benefit, differences in benefits by gender or other layers of diversity within stakeholders, and the number of beneficiaries expected. The number of communities is insufficient detail – number of households should be the largest unit used. Demand reduction projects should demonstrate their indirect links to poverty reduction.

In the short/medium term, supporting partner agencies to investigate and prosecute wildlife and forestry traffickers and public officials for corruption, as well as wildlife/forestry crime and money laundering, will disrupt the criminal networks and their enablers for lengthy periods of time, through commensurate custodial sentences and asset confiscation that result from multiple charges and closer inter-agency co-operation. In the longer term, it will send a strong deterrent signal to existing criminal networks and public officials that both combating IWT and corruption are top priorities for the Government of Malawi thereby altering the cost-benefit calculations for those considering engaging in IWT.

Prevention: In the short/medium term, assessing and evaluating the internal corruption risks in the DNPW, DoF and MPS will facilitate the prioritisation of scarce resources to address the highest risk processes. With the project's support, these agencies will develop cost-effective solutions to mitigate these risks, thereby decreasing opportunities for corruption to undermine successful wildlife/forestry enforcement and conservation efforts by the government. Depriving wildlife criminals of the opportunity to unfairly influence government processes removes a crucial tool from their arsenal. In the longer term, this will increasingly level the playing field: criminal networks will struggle to evade capture, to move their illicit goods, to safeguard their ill-gotten gains and to influence government policy to their advantage. This process will take some time, however, within this project we expect to see significant procedural changes which will decrease corruption risks.

In terms of species, the most immediate impact will be on those most commonly trafficked: Elephants, Rhinoceros and Pangolin - both within Malawi and across the region as most wildlife crimes in Malawi include animals/products illegally imported. There are encouraging signs that although still high, the elephant ivory trade has declined in Malawi; there was a 44% decrease in ivory court cases 2017-2020. However, over the same period, there was a 12-fold increase in the number of defendants in pangolin-related court cases. Between April 2020 and January 2022, Malawi recorded 301 IWT-related arrests, 153 related to pangolins and seized 112 pangolins. In 2020, pangolin cases far exceeded elephant cases and IWT remains the most significant threat to elephants, pangolins and rhinos in the country.

In the long-term, it is our hope that a bolstered and comprehensive improvement of the wildlife and forestry governance systems, and the deterrent effect of the prosecution of financial crime and corruption cases, will enable the government of Malawi to effectively and sustainably allocate its limited resources towards the control of IWT and the wider protection of biodiversity.

Q20. Pathway to change

Please outline your project's expected pathway to change. This should be an overview of the overall project logic and outline how you expect your Outputs to contribute towards your overall Outcome and, longer term, your expected Impact.

We take a two-tiered pathway to change to address wildlife/forestry-related corruption by making it 1) more risky and 2) less lucrative. Together, this makes the crime less attractive.

Increased risk as a result of enforcement support: when the likelihood of detection, prosecution and asset forfeiture increases, IWT becomes less attractive. Running a business from jail is inefficient; confiscated assets are hard to replace; managing a legal defence is expensive; developing new detection avoidance techniques is challenging.

Logic chain: case support through expert mentoring and training --> Capacity of Malawi to detect, investigate and prosecute IWT financial crime increases --> more convictions for IWT financial crime, greater sanctions and asset recoveries --> risks to engage in IWT increase --> incentives for IWT decrease.

Increased costs can be achieved through prevention-oriented activities. The project will help reduce corruption opportunities in relevant agencies through improved governance and control. Thereby corruption loopholes will be fewer, and squeezing through them will become more expensive.

Logic chain: Building better understanding of corruption risks (in relevant agencies) --> designing and implementing systems to decrease these risks --> obstacles make IWT corruption more challenging --> IWT corruption costs increase --> economic utility to engage in IWT corruption decreases.

Q21. Exit Strategy

How the project will reach a sustainable point and continue to deliver benefits post-funding? Will the activities require funding and support from other sources, or will they be mainstreamed in to "business as usual"? How will the required knowledge and skills remain available to sustain the benefits? How will your approach, if proven, be scaled?

This project deals with a topic that is highly complex and still not well understood, even in considerably more advanced jurisdictions. Realistically therefore, capacity gaps will remain and more need for technical assistance will be required at the end of a two-year project. We expect, however, that the project will substantially increase in-country expertise and mechanisms which can operate with a greater degree of independence. We plan to achieve this by:

Learning by doing / Mentoring: With almost two decades of experience, we can rely on experience and evidence that this approach leads to increased independence. After similar FCDO funded interventions in Kenya, we are now able to significantly scale down our programme of work as the agency has achieved a level of maturity which requires minimal support.





Through a multi-agency approach, we hedge risks, minimise over-reliance on any agency and promote collaboration which is key to any anti-corruption response. Adaptive programming allows us to allocate investigative resources between agencies depending on case progression and partner agencies' buy-in, level of resource investment, and willingness to build sustainable systems.

On the prevention side, we will a) improve existing policies and processes to make them less corruption-prone and b) work hard to understand the current culture around integrity and reporting mechanisms at our stakeholder agencies. We will support agencies to develop culturally and agency appropriate mechanisms so that complaints are easier to make and seen by institutions as opportunities to strengthen resilience.

Most importantly, our long-term presence in Malawi and our close partnership with the country's eminent, locally-based conservation NGO, Lilongwe Wildlife Trust, will ensure institutional encouragement to keep building on the current grant remains. We see this grant as an opportunity to foster the institutional relationship between the Basel Institute and LWT,

which will endure far beyond the grant's period.

If necessary, please provide supporting documentation e.g. maps, diagrams, references etc., as a PDF using the File Upload below:

 [references Rnd8St2](#)
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Section 7 - Risk Management

Q22. Risk Management

Please outline the 6 key risks to achievement of your Project Outcome and how these risks will be managed and mitigated, referring to the [Risk Guidance](#). This should include at least one Fiduciary, one Safeguarding Risk, and one Delivery Chain Risk.

Projects should also draft their initial risk register, using the [Risk Assessment template](#), and be prepared to submit this when requested if you are recommended for funding. Do not attach this to your application.

Risk Description	Impact	Prob.	Gross Risk	Mitigation	Residual Risk
Fiduciary Fraud or theft of project resources, timesheet fraud	Moderate	Unlikely	Moderate	Financial risks are low, as the majority of our projects. By minimising procurement and sub-contracting to third parties and handling of cash, standard controls are deemed sufficient. Timesheet fraud risks will be mitigated by detailed supervisor review and in-country checkins. Basel and LWT have excellent audit reports on similar grants.	Minor
Safeguarding Staff are harassed by stakeholder representatives.	Major	Possible	Major	Staff safeguarding is the top priority. Enforcement environments, with their power imbalances, have weak safeguards. To mitigate, we will avoid 1-on-1 meetings. If wrongdoing occurs, staff will be courteous, firm and extricate themselves. Management will report and manage institutional fallout. Basel/LWT will mainstream safeguarding to stakeholders during risk assessments.	Moderate

Delivery Chain Lack of political buy-in	Major	Possible	Major	High-profile political buy-in to tackle IWT Corruption might ebb. Mitigation measures: diverse relationships at top, mid and ground level across stakeholders, assuming buy-in will differ depending on profile. Our strong relationships with all project stakeholder will be crucial should a more advocacy-focused approach be necessary to encourage government cooperation.	Minor
Risk 4 Lack of cases	Major	Possible	Major	Our review found IWT cases with corruption indications, but few of them might be viable. This will be mitigated by expanding "live" cases; considering re-opening old cases; taking a creative case approach (eg pursuing tax charges rather than money laundering); and engaging lower burden of proof civil cases.	Moderate
Risk 5 Key Staff risks	Major	Possible	Major	The Financial Investigation and Corruption Specialist position will be sensitive to fill, requiring technical skills, cultural sensitivity, but also partner and stakeholder trust allowing access to classified materials. Should there be a staffing disruption, Basel will engage its in-house advisors specializing in environmental corruption until a replacement is found.	Minor
Risk 6 Security risks for advisors	Severe	Unlikely	Major	IWT syndicates and corrupt officials are dangerous. Basel and LWT are experienced in physical risk mitigation and enhancing standard protocols for this project with: a very low profile/no media visibility, constant stakeholder communications, strict cyber security and shortening the time during which evidence is held exclusively by our investigators.	Minor

Section 8 - Implementation Timetable


Q23. Provide a project implementation timetable that shows the key milestones in project activities

Provide a project implementation timetable that shows the key milestones in project activities. Complete the Word


template as appropriate to describe the intended workplan for your project.

Implementation Timetable Template

Please add/remove columns to reflect the length of your project. For each activity (add/remove rows as appropriate) indicate the number of months it will last, and fill/shade only the quarters in which an activity will be carried out. The workplan can span multiple pages if necessary.

 [IWT-R8 Basel Malawi Timetable FINAL](#)

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Section 9 - Monitoring and Evaluation

Q24. Monitoring and evaluation (M&E)

Describe how the progress of the project will be monitored and evaluated, making reference to who is responsible for the project's M&E.

IWT Challenge Fund projects are expected to be adaptive and you should detail how the monitoring and evaluation will feed into the delivery of the project including its management. M&E is expected to be built into the project and not an 'add' on. It is as important to measure for negative impacts as it is for positive impact. Additionally, please indicate an approximate budget and level of effort (person days) to be spent on M&E (see [Finance Guidance](#)).

Basel/TSOC and LWT have both developed rigorous M&E systems that will also flow down into this project:

- The Team Leader visited Lilongwe to design the proposal jointly with the LWT. Each of the stakeholders provided detailed inputs to synchronise it with their own institutional programmes.
- At the start of the new program, an all-team workshop will review the logframe and metrics, ensuring buy-in into the M&E system.
- Financial investigations are rarely straightforward. There are always complications, inaccessible data, administrative blocks, political factors, jurisdictional or capacity issues, etc. This requires the entire team's diverse backgrounds and engagement (accounting, audit, investigations, open-source and IWT intelligence, resource management, etc).
- To avoid silos, fortnightly Basel/LWT calls will highlight progress and address challenges. Weekly updates across all projects at the Institute will also allow us to learn from similar projects implemented in other countries and initiate collaboration where possible.
- Based on our experience handling complex corruption cases, on a monthly basis, an in-depth case status meeting will determine progress on cases and jointly allocate investigative resources for the following month. Bottlenecks such as case file access will thus be identified early and elevated to the Institute's leadership for resolution.
- These feedback loops will support an adaptive management approach, where team members feel comfortable experimenting with novel approaches (such as illicit enrichment charges), which are then evaluated for success/failure; successful approaches can be scaled up quickly.
- In regards to case progress, the team will adopt the Basel Institute's case monitoring tool, designed to transparently and systematically track step-by-step progress in cases of financial crime and asset recovery. The tool is being continuously improved in line with the specifications of the Institute's core donors, including the UK FCDO, and enables us to measure case progress both quantitatively and qualitatively.
- While the entire team will be aware and engaged in M&E, the program officer will coordinate the monitoring of progress

towards agreed indicators (including evidence collection) on a regular basis. She specialises in M&E for environmental crime, including two IWT CF programs, making it easier for us to quickly identify and address failings or negative impacts as well as opportunities for improvement.

One important element of adaptive management will be addressing the continued challenges of COVID-19. While it is clear that in-person mentoring is the better option where possible, we are confident that we can implement the project even if movement restrictions are once again imposed:

- Once trust and secure data-sharing systems are established, collaborative case work is possible through online communications channels, interspersed with socially distanced meetings when feasible.

- In-person training is preferable, but we moved our highly interactive trainings online due to the pandemic, both live and self-paced, such as the highly successful Open-Source Intelligence Course.

- The in-country presence of two advisors minimises the need for international travel. Oversight, M&E and communications have already moved completely online and operate successfully.

- Analytical support from Basel-based analysts is being provided through secure online data-sharing systems.

Total project budget for M&E in GBP (this may include Staff, Travel and Subsistence costs)

██████████

Percentage of total project budget set aside for M&E (%)

█

Number of days planned for M&E

243

Section 10 - Logical Framework

Q25. Logical Framework

IWT Challenge Fund projects will be required to monitor and report against their progress towards their Outputs and Outcome. This section sets out the expected Outputs and Outcome of your project, how you expect to measure progress against these and how we can verify this.

- [Stage 2 Logframe Template](#)

Please complete your full logframe in the separate Word template and upload as a PDF using the file upload below – **please do not edit the template structure other than adding additional Outputs if needed as a logframe submitted in a different format may make your application ineligible**. Copy your Impact, Outcome and Output statements and your activities below - these should be the same as in your uploaded logframe.

Please upload your logframe as a PDF document.

 [IWT R8 St2 Logical Framework Basel FINAL](#)

 22/03/2022

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 pdf 199.23 KB

Impact:

Reduce the ability of criminal groups to carry out and profit from poaching and trafficking of protected flora and fauna originating from or transiting Malawi

Outcome:

Strengthened anti-corruption enforcement and prevention efforts within IWT-relevant agencies

Project Outputs

Output 1:

Anti-corruption agencies gain the capacity to investigate and prosecute wildlife crime-related corruption offenses.

Output 2:

Wildlife agencies' integrity risks are mapped, analyzed, evaluated, and mitigation plans have been developed.

Output 3:

Wildlife agencies' internal control units are empowered to manage integrity risks.

Output 4:

New Anti-Corruption Task Force at inter-agency committee on combating wildlife crime (IACCWC) reduces institutional silos in anti-corruption efforts

Output 5:

No Response

Do you require more Output fields?

It is advised to have fewer than 6 Outputs since this level of detail can be provided at the Activity level.

No

Activities

Each activity is numbered according to the Output that it will contribute towards, for example, 1.1, 1.2, 1.3 are contributing to Output 1.

1.1.

- Deploy Financial Investigations and Corruption Advisor
- Conduct training needs assessment
- Deliver case-based training for LE agencies to detect and investigate corruption in IWT and Forestry crime.

1.2

- Review of historical cases in LWT's Wildlife Crime Information Database for corruption indications
- Develop red flags list for future case analysis
- Joint identification of top cases worth pursuing (with stakeholders)
- Financial Investigations and Corruption Advisor mentors investigators to develop cases.
- Monthly case review meetings
- Quarterly prioritization meetings

1.3 Drafting of analysis and supporting documentation.

2.1 Workshops to present findings from recent Corruption Risk Assessments

2.2. Work with investigation/standards units within the DNPW (Wildlife Crime Investigation Unit), MPS (Department of Professional Standards, Criminal Intelligence Unit) and DoF (investigations Unit) to develop Corruption Prevention Action Plans for each agency

2.3. Conduct additional assessments for risks on topics not previously covered in the USAID-funded CRAs

2.4. Develop mitigation plans for new risks, jointly with government.

2.5. Refine individual mitigation measures

2.6. Adoption of mitigation measures by stakeholders

2.7. Implement mitigation measures

3.1 With each agency's integrity committee (IC), review the internal controls assessment previously conducted with stakeholders.

3.2. Work with agency heads to agree on strengthening ICs.

3.3. Develop joint measures to increase IC a) independence and b) professionalism.

3.4. Work with respective stakeholders, ACB and Vice President's office to promote adoption of changes in authority.

4.1 Coordinate with agencies to promote idea of AC Task Force

- 4.2. Draft terms of reference for task force
- 4.3. Support adoption of terms of reference
- 4.4. Host regular Task Force meetings
- 4.5. Implement joint projects to reduce common corruption risks.

Section 11 - Budget and Funding

Q26. Budget

Please complete the appropriate Excel spreadsheet, which provides the Budget for this application. Some of the questions earlier and below refer to the information in this spreadsheet.





Note that there are different templates for projects requesting under £100,000 and over £100,000. Please refer to the [Finance Guidance](#) for more information.

- [Budget form for projects under £100k](#)
- [Budget form for projects over £100k](#)

Please ensure you include any co-financing figures in the Budget spreadsheet to clarify the full budget required to deliver this project.

N.B.: Please state all costs by financial year (1 April to 31 March) and in GBP. The IWT Challenge Fund cannot agree any increase in grants once awarded.

Please upload your completed IWT Challenge Fund Budget Form Excel spreadsheet using the field below.

 [Budget Basel institute IWTCF RD8St2 FINAL JG](#)
 22/03/2022
 20:21:44
 xlsx 41.16 KB

Q27. Funding

Q27a. Is this a new initiative or does it build on existing work (delivered by anyone and funded through any source)?

- Development of existing work

Please provide details:

It builds on the FCDO-Funded Targeting Serious and Organized Corruption project, which provides technical assistance to Malawi's anti-corruption agencies, including intelligence, investigations and prosecutions.

The prevention work will utilize the recommendations from USAID/TNRC-funded research in Malawi: Political Economy Analysis, Corruption Risk Assessments and internal controls assessments.

Builds on court monitoring, co-prosecution and law enforcement training programmes implemented by LWT through funding from USINL, and major private donors (e.g. Wildcat and Paul Allen Foundation).

Builds on IWTCF 088 and 093 (Basel): development of better stakeholder engagement, training materials, advice on case development from other programs, asset recovery expertise.

Cooperates with the USAID/FCDO project on Modern Cooking for Healthy Forests in Malawi project, which focuses on forestry governance and law enforcement to create industries of scale.

Builds on RUSI and EIA's IWTCF projects - significant know-how and training on financial investigations in Malawi, providing upskilled stakeholders.

Follows up on recommendations in the Malawi Parliamentary Conservation Caucus report 'The Role of Corruption in Enabling Wildlife and Forest Crime in Malawi (2021)'

Q27b. Are you aware of any current or future plans for similar work to the proposed project?

Yes

Please give details explaining similarities and differences, and explaining how your work will be additional and what attempts have been/will be made to co-operate with and learn lessons from such work for mutual benefits.

IWT096: This project supports Malawi, Namibia, Zambia and Uganda in conducting multi-agency IWT closed-case reviews to generate new financial intelligence and improve investigative capacity. Activities will involve financial analysis of cases, delivery of 'train-the-trainer' workshops, best practice and operational support.

Our engagement would be quite different. a) While it also utilises financial investigations as a method, and will benefit from existing know-how and capacity built during IWT096, our programme focuses on corruption-related convictions, which requires rather different case strategies and tactics. b) Our embedded advisor methodology also differs significantly from existing IWTCF programs and could serve as a conduit to apply the numerous lessons learned. c) we will focus on ongoing, live, cases, rather a historical analysis of past cases. d) our corruption prevention component is entirely new to the IWTCF portfolio.

Q28. Capital items

If you plan to purchase capital items with IWT funding, please indicate what you anticipate will happen to the items following project end. If you are requesting more than 10% capital costs, please provide your justification here.

Two laptops in total and peripherals will be purchased for the financial investigations and corruption advisor and the corruption prevention advisor. These will be given to LWT after the completion of the project.

Q29. Value for Money

Please describe why you consider your application to be good value for money including justification of why the measures you will adopt will secure value for money.

Economy:

- The programme will be implemented by a team consisting of an international and a Malawian expert
- We will incur only minimal office rental costs. Experts will spend most of their time at partner and stakeholders locations.
- Other grants and core funding of both partners will provide extensive cost share.
- Both HQ and consultant salaries have been reviewed by external advisers and were found to be in line with peer organisations.
- The pandemic-necessitated shift of many management and monitoring functions online decreases international travel.

Efficiency:

- Build on other IWTCF programs, including customising existing training materials.
- Lead partners' existing Malawi programming provides country expertise and relationships, compressing start-up period and costs.
- Basel-based financial investigators, IWT, intelligence, and asset recovery experts are on call from day one (largely through matched funding).

Effectiveness:

- Partnership with LWT, a Malawian organisation, and the strong involvement of multiple Malawian agencies ensures long-lasting impacts.
- Adaptive management approach: We'll initially engage on many cases with different agencies, evaluate progress and

re-allocate resources towards those cases that are effectively progressing in accordance with our logframe.

Equity:

- By focusing exclusively on the higher end of the IWT value chain (mid-senior level criminals), we will target those making substantial profits from IWT, and engaging in financial crime and corrupt practices, rather than subsistence level poachers or low-ranking traders.

- Reducing corruption risks will also reduce the unequal access to public services, corruption's inevitable consequence.

Section 12 - Safeguarding and Ethics

Q30. Safeguarding

Projects funded through the IWT Challenge Fund must fully protect vulnerable people all of the time, wherever they work. In order to provide assurance of this, projects are required to have appropriate safeguarding policies in place.

Please confirm the Lead Partner has the following policies in place and that these can be available on request:

Please upload the lead partner's Safeguarding Policy as a PDF on the certification page.

We have a safeguarding policy, which includes a statement of our commitment to safeguarding and a zero tolerance statement on bullying, harassment and sexual exploitation and abuse	Checked
We have attached a copy of our safeguarding policy to this application (file upload on certification page)	Checked
We keep a detailed register of safeguarding issues raised and how they were dealt with	Checked
We have clear investigation and disciplinary procedures to use when allegations and complaints are made, and have clear processes in place for when a disclosure is made	Checked
We share our safeguarding policy with downstream partners	Checked
We have a whistle-blowing policy which protects whistle blowers from reprisals and includes clear processes for dealing with concerns raised	Checked
We have a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours - inside and outside the work place - and make clear what will happen in the event of non-compliance or breach of these standards	Checked

Please outline how you will implement your safeguarding policies in practice and ensure that downstream partners apply the same standards as the Lead Partner.

If your project involves data collection and/or analysis which identifies individuals (e.g. biometric data, intelligence data), please explain the measures which are in place and/or will be taken to ensure the proper control and use of the data. Please explain the experience of the organisations involved in managing this information in your project

Our safeguarding principle and practice is included and informed by our Code of Ethics. (Standards paragraph titled Safeguarding, fairness, diversity and respect). We have a separate official guidance note/information sheet on Safeguarding at the Basel Institute, which reiterates what safeguarding means and how concerns should be raised. Both these official documents are shared with a new staff member and form an integral part of employment contracts. During the induction, HR again alerts new staff to Safeguarding practices.

During staff retreats, the agenda includes a refresher awareness and information sharing session on the Institute's Code of Ethics, including Safeguarding.

Safeguarding measures always flow down in any consultancy service contract, individual or organisational.

Personal information is collected as part of case-focused work. GDPR, Swiss law and Malawi law all allow data sharing as part of criminal law processes. Data will be stored securely on LWT's and the Basel Institute's limited access servers and operated by staff at both agencies with law enforcement experience and adhering to data sharing guidelines of both organisations. In all cases, we will pass the data to government through well developed secure systems as soon as possible.

Q31. Ethics

Outline your approach to meeting the key ethical principles, as outlined in the guidance.

Both partners are committed to ethical principles in the implementation of their work.

This involves, in criminal case work, the ethical sourcing of intelligence and information, especially personal identifiers, and their careful distribution in ways that minimizes harm. On the prevention side, the do-no-harm principles focus on new regulations and standard operating procedures that are tested for unintended consequences. No corruption prevention measure is one-size-fits all and mitigation measures need to be driven by Malawians to be effective and sustainable.

We have restricted the visibility of the programme in order to adhere to our ethical obligation to safeguard our staff and partners and to give greater ownership of achievements to our Malawian government stakeholders. While we will strive to publish best practices, this will be done cautiously and in an anonymized way.

While we focus on the well-being of flora and fauna, we are not ready to compromise that of human beings. A challenging balance when prevailing cultural norms encourage the unsustainable exploitation of natural resources for short-term economic benefit.

Our research activities adhere to Prior Informed Consent rules enshrined in our Ethical Guidelines for Research. All our ethical guidelines are periodically reviewed and approved by senior leadership.

Section 13 - FCDO Notifications

Q32. FCDO Notifications

Please state whether there are sensitivities that the Foreign Commonwealth and Development Office will need to be aware of should they want to publicise the project's success in the Darwin Initiative in any country.

Yes


Please outline and provide reasoning for any sensitivities that the Foreign and Commonwealth Office need to be aware of.

Based on our experience, tackling corruption and wildlife crime comes with serious security risks for our staff. Combining the two, by its very definition, means we will be coming up against politically connected criminals with wide leverage to fight back. Announcing to these criminals that we are coming through project publications is an unnecessary operational risk. Therefore, we request that the project remain off the radar for its enforcement element. Some of the prevention work can be publicised, subject to careful reviews to prevent stakeholder ownership from being undermined.


Please indicate whether you have contacted FCDO Embassy or High Commission to discuss the project and attach details of any advice you have received from them.

Yes

Please attach evidence of request or advice if received.

 [Contact with BHC Lilongwe 12Mar22](#)

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Section 14 - Project Staff

Q33. Project staff

Please identify the core staff (identified in the budget), their role and what % of their time they will be working on the project.

Please provide 1-page CVs or job description, further information on who is considered core staff can be found in the [Finance Guidance](#).

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Juhani Grossmann	Project Leader	9	Checked
Taradhinta Suryandari	Programme Officer	13	Checked
Amanda Cabrejo Le Roux	Natural Crime Resource Specialist	16	Checked
Stephen Ratcliffe	Senior Investigation Specialist	10	Checked





Do you require more fields?

Yes

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
TBD	Financial Investigation and Corruption Advisor	57	Checked
TBD	Corruption Prevention Advisor	62	Checked
Matt Husher	Technical Advisor - IWT cases	10	Checked
Donnamarie O'Connell	LWT Lead	15	Checked
Jonny Vaughan	CEO	5	Checked
No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked
No Response	No Response	0	Unchecked

Please provide 1 page CVs (or job description if yet to be recruited) for the project staff listed above as a combined PDF.

Ensure the file is named clearly, consistent with the named individual and role above.

 [Collated CVs](#)
 22/03/2022
 20:58:40
 pdf 1.02 MB

Have you attached all project staff CVs?


Yes

Section 15 - Project Partners

Q34. Project partners

Please list all the Project Partners (including the Lead Partner), clearly setting out their roles and responsibilities in the project including the extent of their engagement so far and planned.

This section should demonstrate the capability and capacity of the Project Partners to successfully deliver the project. Please provide Letters of Support for all project partners or explain why this has not been included.

Lead partner name:	Basel Institute on Governance
Website address:	www.baselgovernance.org
Details (including roles and responsibilities and capabilities and capacity):	<p>The Basel Institute will lead this project and provide its core staff.</p> <p>a) Financial Investigations and Corruption Advisor, a financial investigator with legal strategy expertise, likely recruited from abroad, with regional experience. S/he will partner with LWT's and stakeholder investigators and prosecutors to augment big IWT cases with financial crime and corruption charges (bribery, illicit enrichment, money laundering, embezzlement, tax crimes, etc).</p> <p>b) The Corruption Prevention Advisor will work with beneficiary agencies to strengthen the internal resilience and minimise opportunities for corruption. S/he will be from Malawi, with a solid understanding of government mechanisms and corruption risk mitigation.</p> <p>The Team Leader will ensure alignment with the priorities of Malawian authorities and synergies with the efforts of other IWT and financial crime projects at the Basel Institute and its partner organisations. A Project Officer will be responsible for monitoring and evaluation.</p> <p>Additional technical support on natural resource crime, anti-corruption, financial investigations, behavioural insights, asset recovery etc. will come from the 40+ in-house technical experts at the Basel Institute.</p>
Allocated budget (proportion or value):	

Represented on the Project Board Yes

Have you included a Letter of Support from this organisation? Yes

Have you provided a cover letter to address your Stage 1 feedback? Yes

Do you have partners involved in the Project?

Yes

1. Partner Name: Lilongwe Wildlife Trust

Website address: www.lilongwewildlife.org

Details (including roles and responsibilities and capabilities and capacity):

LWT is Malawi's leading nature conservation NGO. LWT is registered in Malawi as a local NGO and not-for-profit Trust. Under its Wildlife Justice Project, LWT employs three private courtroom monitors and three private prosecutors who are mandated to prosecute wildlife crime on behalf of the Directorate of Public Prosecutions.

LWT will be an implementing partner and will facilitate coordination with all beneficiary agencies. LWT staff will work closely with the financial investigations advisor to advise on financial and corruption cases to be actioned by ACB and other agencies. LWT will also support the project through access to its Wildlife Crime Information System database, which holds records of all wildlife crime cases monitored under its Wildlife Justice Project. LWT will support the work of the corruption prevention specialist through providing guidance on known risks and challenges. LWT will contribute to all M&E components. LWT has successfully run multiple IWT law enforcement programmes in Malawi for over the past 7 years including through the IWT CF.

Allocated budget: XXXXXXXXXX

Represented on the Project Board Yes

Have you included a Letter of Support from this organisation? Yes

2. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capabilities and capacity): *No Response*

Allocated budget: £0.00

Represented on the Project Board Yes
 No

Have you included a Letter of Support from this organisation? Yes
 No

3. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capabilities and capacity): *No Response*

Allocated budget: £0.00

Represented on the Project Board Yes
 No

Have you included a Letter of Support from this organisation? Yes
 No

4. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capabilities and capacity): *No Response*

Allocated budget: £0.00

Represented on the Project Board Yes
 No

Have you included a Letter of Support from this organisation? Yes
 No

5. Partner Name: *No Response*

Website address: *No Response*

Details (including roles and responsibilities and capabilities and capacity): *No Response*

Allocated budget: £0.00

Represented on the Project Board Yes
 No

Have you included a Letter of Support from this organisation? Yes
 No

6. Partner Name: *No Response*

Website address: *No Response*

Details *No Response*
(including roles and responsibilities and capabilities and capacity):

Allocated budget: £0.00


Represented on the Project Board Yes
 No


Have you included a Letter of Support from this organisation? Yes
 No

If you require more space to enter details regarding Partners involved in the project, please use the text field below.

No Response

Please provide a cover letter responding to feedback received at Stage 1 if applicable and a combined PDF of all letters of support.

 [Collated support letters](#)


 22/03/2022

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 pdf 4.36 MB

 [Basel Institute cover letter IWT CF Malawi R8St2 FINAL](#)

 21/03/2022

 11:16:11

 pdf 149.17 KB

Section 16 - Lead Partner Capability and Capacity

Q35. Lead Partner Capability and Capacity

Has your organisation been awarded IWT Challenge Fund funding before (for the purposes of this question, being a partner does not count)?

Yes

If yes, please provide details of the most recent awards (up to 6 examples).

Reference No	Project Leader	Title
IWT 092	Juhani Grossmann	Disrupting the financing of Andean IWT networks through asset recovery
IWT 088	Juhani Grossmann	Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>

No Response No Response No Response

No Response No Response No Response

No Response No Response No Response

Have you provided the requested signed audited/independently examined accounts?

If yes, please upload these on the certification page. Note that this is not required from Government Agencies.

Yes

Section 17 - Certification

Q36. Certification

On behalf of the

Trustees

of

Basel Institute on Governance

I apply for a grant of

[REDACTED]

I certify that, to the best of our knowledge and belief, the statements made by us in this application are true and the information provided is correct. I am aware that this application form will form the basis of the project schedule should this application be successful.

(This form should be signed by an individual authorised by the applicant institution to submit applications and sign contracts on their behalf.)

- I have enclosed CVs for project key project personnel, letters of support, budget, logframe, safeguarding policy and project implementation timetable (uploaded at appropriate points in application).
- Our last two sets of signed audited/independently verified accounts and annual report (or other financial evidence – see [Financial Guidance](#)) are also enclosed.

Checked





Name Gretta Fenner





Position in the organisation Managing Director

Signature (please upload e-signature)
 [Signature GF](#)
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Date 22 March 2022





Please attach the requested signed audited/independently examined accounts.

 [BIOG - RSTB 2020-conv-sig BW](#)
 21/03/2022
 20:03:42
 pdf 4.57 MB

 [BIOG - RSTB 2019-conv-sig BW](#)
 21/03/2022
 10:53:12
 pdf 3.12 MB

Please upload the Lead Partner's Safeguarding Policy as a PDF

 [191016-Code of Ethics rev FINAL](#)
 21/03/2022
 11:02:50
 pdf 242.71 KB

 [2019 Safeguarding at Basel Institute](#)
 21/03/2022
 10:53:22
 pdf 44.14 KB

Section 18 - Submission Checklist

Checklist for submission

	Check
I have read the Guidance, including the "IWT Challenge Fund Guidance", "Monitoring Evaluation and Learning Guidance", "Risk Guidance" and "Financial Guidance".	Checked
I have read, and can meet, the current Terms and Conditions for this fund.	Checked
I have provided actual start and end dates for the project.	Checked
I have provided my budget based on UK government financial years i.e. 1 April - 31 March and in GBP.	Checked
I have checked that our budget is complete, correctly adds up and I have included the correct final total at the start of the application.	Checked
The application been signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).	Checked
I have attached my completed logframe as a PDF using the template provided	Checked
(If copying and pasting into Flexi-Grant) I have checked that all my responses have been successfully copied into the online application form.	Checked
I have included a 1 page CV or job description for all the Project Staff identified at Question 33, including the Project Leader, or provided an explanation of why not.	Checked
I have included a letter of support from the Lead Partner and partner(s) identified at Question 34, or an explanation of why not.	Checked
I have included a cover letter from the Lead Partner, outlining how any feedback received at Stage 1 has been addressed where relevant.	Checked
I have included a copy of the Lead Partner's safeguarding policy, which covers the criteria listed in Question 30.	Checked
I have been in contact with the FCDO in the project country/ies and have included any evidence of this. If not, I have provided an explanation of why not.	Checked

I have included a signed copy of the last 2 annual report and accounts for the Lead Partner, or other evidence of financial capacity as set out in the Financial Guidance, or provided an explanation if not. Checked

I have checked the IWT Challenge Fund website immediately prior to submission to ensure there are no late updates. Checked

I have read and understood the Privacy Notice on the IWT Challenge Fund website. Checked

We would like to keep in touch!

Please check this box if you would be happy for the lead applicant (Flexi-Grant Account Holder) and project leader (if different) to be added to our mailing list. Through our mailing list we share updates on upcoming and current application rounds under the Darwin Initiative and our sister grant scheme, the IWT Challenge Fund. We also provide occasional updates on other UK Government activities related to biodiversity conservation and share our quarterly project newsletter. You are free to unsubscribe at any time.

Unchecked

Data protection and use of personal data

Information supplied in the application form, including personal data, will be used by Defra as set out in the **Privacy Notice**, available from the [Forms and Guidance Portal](#).

This **Privacy Notice must be provided to all individuals** whose personal data is supplied in the application form. Some information may be used when publicising the Darwin Initiative including project details (usually title, lead partner, project leader, location, and total grant value).