

IWTR11S2\1015

Building a global network to prevent biodiversity-related corruption.

In Bolivia, Madagascar, and Malawi, corruption facilitates wildlife trafficking. We will select anti-IWT and conservation efforts with relevance for poverty reduction and inclusivity and which are at high risk of being undermined by corruption. We will then a) build a multi-faceted support system to help our government partners mitigate these corruption risks through our customised risk assessment methodology, b) draw on lessons from a best practices database, and c) facilitate South-South support through the first-ever global Wildlife Corruption Prevention Support Network.

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Section 1 - Contact Details

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GMS ORGANISATION

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Section 2 - Title, Themes and Summary

Please confirm which fund you are applying to:

Main

Q3. Title:

Building a global network to prevent biodiversity-related corruption.

Please upload a cover letter as a PDF document.

-
- Cover Letter Global prevention DEFRA 30Mar25
 - 1
 - 30/03/2025
 - 21:33:19
 - pdf 148.08 KB

What was your Stage 1 reference number? e.g. IWTEXR11S1\1001

IWTR11S1\1114

Q4. Response to Stage 1 feedback

You must explicitly set out how and where you have addressed all the comments/feedback in the application form: briefly restating the feedback point, then clearly setting out how you have responded to it in the application.

["Q" refers to a corresponding question in the form. "RQ" refers to References, organized by proposal form question number]

Consequences if both proposals aren't funded?

The Malawi proposal covers prevention and enforcement efforts, while the present proposal is a global prevention-oriented one (References 1, Map). The only overlap is the in-Malawi prevention work. Should both proposals be funded, we scale prevention operations in Malawi. Should only the present proposal win, we will have a robust three-country prevention engagement. Should only the Malawi proposal be funded, it will become a single country activity that will benefit from our global advisors (Q20).

Did you consider applying for Extra grant and why did you not?

We did consider it, but opted not to for two reasons: combining in-country corruption prevention advisory efforts to increase the effectiveness of conservation efforts with a global peer network is an innovation we would like to test before proposing scaling (Q20, Q25) and the rare Extra grants make the cost-benefit effort not commensurate to the odds of winning.

Value of adding Upper Middle Income Countries (UMICs) unclear.

Engaging Peru and Indonesia is valuable because their experience with environmental corruption prevention efforts is more advanced than that of Bolivia, Madagascar and Malawi. Experience from the UMICs addresses a key challenge (Q16) we have discovered: most existing anti-corruption tools are from contexts too advanced to be practical in LDCs and LMICs. The UMIC experience helps bridge that gap. To allocate sufficient project resources for LDCs and LMICs, we removed the UMICs as partners (Q10) and will be able to draw on their expertise without financial support (Q20).

Long-term working group sustainability.

The Wildlife Corruption Prevention Working Group (WCPWG) creation draws on the experience of creating, hosting and managing the Follow-the-Money Working Group under IWT128. We have learned a tremendous amount about bringing together experts from many jurisdictions, their interests, their motivations, and the constraints on their engagement (Q16). Both working groups will be part of the Countering Environmental Corruption Practitioner's Forum, which we created three years ago together with WWF, TRAFFIC and Transparency International (Q20). All four institutions remain committed to driving this Forum forward in the years to come. It is enshrined in our next Green Corruption strategy (Q14.9). We jointly raise funds for the Forum.

How will the group operate and who will lead it?

We will initiate and facilitate the WCPWG, given the limited expertise of our partners in managing such complex settings (Q17). Sessions will take place online, with regional physical get-togethers arranged where supplemental funding allows (ISF in Latam). Our experience shows that the utility of such a group depends directly on being able to help with specific challenges its members face, which we anticipate to be requests to review draft mitigation measures, such as codes of ethics or whistleblowing systems, to identify weaknesses at the implementation stage and to ensure they meet international standards. Connecting partners who are in the drafting stage with those who have already implemented similar measures will be exceptionally valuable. We are therefore explicitly adding an output and indicators to track our ability to make this collaboration happen. It will be key to the WCPWG's continued engagement and long-term sustainability (Q20, Q25).

Database location, maintenance, access, security

The database will be hosted on our secure server in Switzerland and contain a publicly accessible section for less sensitive and password-protected section for more sensitive materials. It will be maintained by our IT staff who have experience hosting data on case-sensitive corruption and money laundering evidence, as well as the United for Wildlife database. We don't anticipate populating the DB with highly confidential data as the primary content will be processed lessons learned, templates, and how-to-guides (Q26).

How to facilitate greater GESI relevance

We have completely overhauled the selection criteria for corruption risks that are applied at the outset and determine what the entire programme will work on. We have now explicitly included selection criteria that prioritize GESI and poverty reduction impact, alongside existing criteria. In a nutshell, corruption risks that undermine GESI and poverty reduction objectives at our partners will now be prioritized over those which don't, hard-coding a GESI and poverty reduction focus into the rest of the programme. (Q22,RQ4.1)

How does tackling corruption directly address IWT or enhance conservation policies?

This question lies at the heart of our proposal's logic and we have made adjustments throughout to reflect this (Q20, Q24, logframe).

In all three countries, corruption deeply undermines the efficiency and efficacy of counter-IWT and conservation measures. Numerous global policy and DEFRA documents refer to this linkage (Q14). In Bolivia, unmitigated personal conflicts of interests by a senior official led to the destruction of protected forests for mining purposes. In Malawi, a major wildlife trafficking kingpin used bribery to leave prison whenever he wanted and run his trafficking business from behind bars, eroding anti-IWT criminal deterrents. In Madagascar, corruption facilitates rosewood smuggling. The conviction of the President's Chief of Staff for corruption related to environmental crime proves the seriousness of the issue.

Since corruption undermines anti-IWT efforts and conservation policies, reducing such corruption would in turn enhance their efficacy. As our theory of change highlights, we will - together with our partners - identify the most high-priority ways in which corruption undermines anti-IWT and conservation efforts (RQ4.1). Based on preliminary conversations, we anticipate that this will include license and permit-issuing processes (which undermine the sustainable utilisation of natural resources and conservation efforts), inspection and guard assignments (which undermine enforcement efforts), and revenue generation efforts (which distort incentives and therefore undermine conservation policies (Q20).

Proposed timeframe realistic in terms of introduction and implementation of new policies and/or legislation? We have adjusted the timeframe to provide more policy-development time, while also prioritising mitigation measures that can be adopted at partner level and do not require legislation/parliamentary approval. Our experience shows that a significant range of mitigation measures falls into this category (workplan).

SMARTen indicators, baselines and progress measuring.

Please see the significantly overhauled logframe (Logframe).

Q5. Which of the four key IWT Challenge Fund themes will your project address?

Please tick all that apply.

- Ensuring effective legal frameworks and deterrents

Q6. Key Ecosystems, Approaches and Threats

Select up to 3 conservation actions that characterise your approach, and up to 3 threats to biodiversity you intend to address, from dropdown lists.

Conservation Action 1

Law & policy (legislation, regulations, standards, codes, enforcement)

Conservation Action 2

External Capacity Building (institutional, partnerships and finance)

Conservation Action 3

Education & awareness (incl. training)

Threats 1

Biological resource use (hunting, gathering, logging, fishing)

Threats 2

Other threats

Threats 3

Energy production & mining (incl. renewables)

Q7. Contribution towards Climate Change Adaption or Mitigation

The IWT Challenge Fund is partly funded through International Climate Finance (ICF). This requires the fund to evidence how it is contributing towards climate change adaption and mitigation.

Please describe how your project may contribute to climate change adaption or mitigation. You should refer to the 'Illegal Wildlife Trade and Climate Change' document, attached to your feedback letter, for further information on some of the ways in which IWT interventions intersect with climate change.

Our programme is governance-focused, and seeks to build the capacity of partners to prevent corruption from undermining their objectives. Our partners typically have responsibilities for both biodiversity and climate change.

Recognising this convergence, our institutional Green Corruption Strategy 2025-28 adds a focus on climate change-related corruption risks, building more robust governance systems in the public and private sectors (RQ16.17).

In our assessment, climate change-related programming has underinvested in corruption risk mitigation measures, including renewables projects (permitting and licensing, land), critical minerals (political interference, strategic corruption, ownership opacity) and carbon credits (lack of control measures and conflicts of interest).

Many of these are the same corruption risks we will address during this project as we engage with conservation

and environmental partners. For example, addressing corruption in forestry-related licensing and permitting will also generate a positive impact on the integrity of climate change adaptation and mitigation efforts.

Q8. Species project is focusing on

Please include both the common name and scientific name.

Rosewood (Dalbergia Spp, Dyospiros Spp) and other tree species	Radiated tortoise (Astrochelys radiata) and ploughshare tortoise (Astrochelys yniphora)
Sea cucumber (holothuria fuscogilva, holothuria nobilis) and other trafficked marine species including black coral (Antipatharia spp)	Succulents including dwarf baobab (Pachypodium)

Do you require more fields?

Yes

Parrots, macaws, finches (e.g. Sicalis flaveola)	Rhinoceros (Rhinocerotidae) and Elephants (loxodonta africana)
Large and small wild cats (e.g. Panthera onca and leopardus colocolo)	Cedar (Cedrela odorata, Cedrela fissilis) and Tajibo (Tabebuia impegtiginosa)

Q9. Summary of project

Please provide a brief non-technical summary of your project: the problem/need it is trying to address, its aims, and the key activities you plan on undertaking.

In Bolivia, Madagascar, and Malawi, corruption facilitates wildlife trafficking. We will select anti-IWT and conservation efforts with relevance for poverty reduction and inclusivity and which are at high risk of being undermined by corruption. We will then a) build a multi-faceted support system to help our government partners mitigate these corruption risks through our customised risk assessment methodology, b) draw on lessons from a best practices database, and c) facilitate South-South support through the first-ever global Wildlife Corruption Prevention Support Network.

Section 3 - Countries, Dates & Budget Summary

Q10. Country(ies)

Which eligible host country(ies) will your project be working in?

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

Do you require more fields?

Yes
 No

If you are proposing to work in an Upper Middle Income Country (see Table 4 in the Round 11 Guidance for Applicants), please demonstrate your case for support with reference to one or more of the criteria in Section 3.4.

Upper Middle Income countries are not included as target countries for technical support. With matched funding from other sources, UMICs (Peru, Indonesia, and to a lesser degree Ukraine) will participate in the Working Group to share their experiences in tackling wildlife-related corruption and provide peer support, but not receive funding under this grant.

Q11. Project dates

Start date:	End date:	Duration (e.g. 2 years, 3 months):
01 October 2025	30 June 2028	2 years, 9 months

Q12. Budget summary

Year:	2025/26	2026/27	2027/28	2028/29	2029/30	Total funding
Amount:	£77,920.00	£210,148.00	£210,148.00	£60,449.00	No Response	558,665.00

Q13. Do you have matched funding arrangements?

Yes

Please ensure you clearly outline your matched funding arrangement in the budget.

Q14. If you have a significant amount of unconfirmed matched funding, please clarify how you will deliver the project if you don't manage to secure this?

We have matched funding from Liechtenstein, ISF funding (Peru, Bolivia), potential DEFRA funding (Malawi), Ukraine SDC funding, NORAD NICFI funding (Indonesia).

We do have unconfirmed funding, but the modular structure of the programme means matched funding acts to scale and is not mission critical. For example, securing the Malawi DEFRA proposal would mean our in-country efforts are more robust. Should we be successful in the NORAD NICFI (forestry crime) proposal, we would be able to increase best practices in the database, the scale of the Working Group and range of technical expertise. Without it, we are still capable of implementing.

Q15. Have you received, applied for or plan to apply for any other UK Government funding for the proposed project or similar?

Yes

Please provide details. If you have received, applied for or plan to apply with similar projects, explain how your activities are distinct and complementary. Note that you cannot apply to OCEAN or any of the Biodiversity Challenge Funds (BCFs) with the same project.

ISF funding covers some corruption prevention in Bolivia until the end of Fiscal Year 2025/26. We have arranged the start date for engagements in Bolivia under this DEFRA proposal to commence after ISF ends to avoid duplication.

Section 4 - Problem statement & Gap in existing approaches

Q16. 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. What is the need, challenge or opportunity? Please describe the level of threat to the species concerned. You should 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.

Corruption is widely recognised as a threat to both conservation and counter-IWT efforts (RQ16.1,2,3,4,5). Corruption reduces the deterrent effects of law enforcement operations targeting elephant tusk traffickers in Malawi and undermines the regulatory and licensing efforts to curb the movement of protected bird species from Bolivia to Peru (RQ16.6).

More broadly, both corruption and wildlife trafficking disproportionately affect poor and marginalised populations and exacerbate poverty. Economic deprivation makes the economically disadvantaged more likely to be drawn into wildlife trafficking (RQ16.7). Wildlife trafficking takes a disproportionate toll on the security and livelihoods of rural, indigenous, and poor people living near wildlife (RQ16.8). Corruption facilitates these harms from wildlife trafficking. It contributes to inequality and undermines poverty reduction efforts, while widespread bribery has a disproportionate impact on the economically disadvantaged (RQ16.9). Countries with higher levels of corruption have lower quality public services (RQ16.10), diversity and inclusion (RQ16.11), public health (RQ16.12), and greater levels of biodiversity loss (RQ16.13).

There is insufficient research to determine which anti-corruption interventions have the greatest impact on IWT and poverty.

To address this knowledge gap, we have modified our programme methodology (RQ4.1), by adding and prioritising poverty and GESI correlation as selection criteria in the selection of conservation-focused public services.

Two approaches to tackling corruption exist: Deterrent/enforcement and prevention. Extensive enforcement programming (RQ16.15) shows solid initial results (IWT088,092,117,128).

However, anti-crime literature (16) notes that enforcement must work in parallel with prevention to achieve transformative change in conditions that perpetuate poverty. This is the focus of this proposal.

Our project seeks to prevent corruption affecting anti-IWT and conservation efforts by helping our partners establish system-wide internal controls (Output 1). Preventing corruption does not have a single, simple solution, but requires a deliberate and diverse portfolio of reforms including corruption risk assessments, codes of ethics, conflict of interest regulations, due diligence systems, and complaint and whistleblower hotlines. These are often administrative orphans, starved of leadership support, finances, internal capacity, and external support (RQ16.1). Nonetheless, we have seen the tremendous potential of such measures, when professionally implemented (RQ16.18).

For three years, we have developed conservation-related corruption mitigation measures, specialising in strengthening existing but weak administrative mechanisms. Where our partners are transforming these from a paper-based exercise to having realistic poverty reduction and conservation benefits (RQ16.19), we will distill their lessons into a database that will facilitate broad access to tools that work (Output 2).

Furthermore, our experience shows that corruption prevention efforts - unlike the traffickers - are stuck in national silos: there is no exchange between countries' conservation agencies about corruption mitigation measures. This means that our partners are investing scarce resources into building very similar risk mitigation systems, without the benefit of their international peers' experiences. By learning from each other, our partners will be able to save resources and better anticipate criminals' next steps.

Learning from challenges in facilitating collaboration, under IWT128 we have developed a deliberate Output 3 focused on facilitating the collaboration of our partners on specific mitigation measures.

Q17. Gap in existing approaches

What gap does your project fill in existing approaches? How will you ensure activities are aligned and do not duplicate ongoing work in the region?

At the global level, there are several endeavours that address environmental corruption from a prevention perspective. The UNCAC Coalition (RQ17.1) focuses on civil society advocacy efforts, not government capacity building. Our Countering Environmental Corruption Practitioner's Forum does not (yet) have a programming stream on corruption prevention. Nature Crime Alliance's (RQ17.1) focus is on private companies, not governments. Our Output 3 activities on facilitating collaboration between government entities is therefore not covered by anyone.

Our Output 1, building the capacity of environmental authorities to mitigate corruption risks, builds on our own (Malawi, Bolivia) and WWF's (Madagascar) past experience seeking to address environmental corruption. In Malawi, Lilongwe Wildlife Trust provides capacity building support but does not focus on administrative corruption. In Madagascar, the USAID-funded WWF programme has ceased, leaving much unmet need. In Bolivia, our modest ISF funding will end in March 2026, which is when we anticipate phasing in support under the present proposal.

Our Output 2, the database on best practices and sample environmental corruption mitigation measures, has some resemblance in UNODC's global environmental corruption programme, which contains analytical tools, which, unlike ours, are not country-specific and do not include materials on the actual design and implementation of mitigation measures.

Section 5 - Objectives & Commitments

Q18. 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.

UN General Assembly Resolution A/75/L.116 (2021) notes "...with concern the role that corruption can play in facilitating illicit trafficking in wildlife and wildlife products..." and calls on UN member states "...to prohibit, prevent and counter any form of corruption that facilitates illicit trafficking in wildlife and wildlife products, including by assessing and mitigating corruption risks in their technical assistance and capacity." (RQ18.1)

Malawi's National Anti-Corruption Strategy (2019-2024): seeks to "diminish the space for corrupt transactions by cutting red tape, enforcement of applicable laws and use of information technologies" (RQ18.3). Its Parliamentary Conservation Caucus (RQ18.2), highlights the importance of strengthening corruption prevention mitigation measures, such as Whistleblowing.

Madagascar's National Anti-Corruption Strategy 2025-2030 (SNLCC_2025-2030) highlights wildlife as one of seven pillars and assigns MEDD a key role in the fight against corruption related to the environment and natural resources. Through the establishment of the Anti-Corruption Directorate (DULCC), the MEDD actively participates in education on this topic, as well as in the prevention of corruption that facilitates environmental offences. This action plan is included in the Internal Anti-Corruption Policy (PILCC). (RQ18.4)

In Bolivia, ABT developed the "Corruption Risk Management Plan for the Biodiversity Sector," aligned with the national and institutional objectives for the prevention of corruption, as outlined in the Plurinational Anti-Corruption Policy (RQ18.5) and in the Law on Transparency and Anti-Corruption Units (RQ18.6). These regulations guide actions to strengthen transparency, institutional integrity, and reduce the risks of corruption in the forestry and land sectors.

Please note Q19 is for Extra applicants only, the next question for those applying to the Main scheme will be Q20. Methodology.

Section 6 - Method, Change Expected, GESI & Post Project Sustainability

Q20. Methodology

Describe the methods and approach you will use to achieve your intended Outcome and contribute towards your Impact. Provide information on:

- How you have reflected on and incorporated **evidence and lessons learnt** from past and present activities and projects in the design of this project.
- **The specific approach you are using, supported by evidence that it will be effective and justifying why you expect it will be successful** in this context.
- How you will undertake the work (activities, materials and methods).
- What the **main activities** will be and where will these take place.
- How you will **manage the work** (governance, roles and responsibilities, project management tools, risks etc.).
- Please explain how you have engaged with partners or communities involved to design the project; if this has not been done please explain why.

We propose a programme that seeks to increase the effectiveness of biodiversity conservation efforts in Bolivia, Malaw and Madagascar by helping our partner conservation and wildlife agencies reduce the corruption risks in their operations (Outcome). We combine capacity building and support to analyse and mitigate IWT-related corruption risks (Output 1) building on lessons learned on how to make these mitigation measures yield results (Output 2) and facilitate peer support in the development of new corruption prevention tools (Output 3). In the programme design, we draw on our experience and a survey of 60 individuals (RQ20.3) at partner agencies, custom-designed to inform this proposal.

To achieve this, we envision the following programming steps:

Output 1:

1) Assess context: We will assess the constraints our mitigation measures will face, using a pared-down version of our Political Economy Analysis methodology (RQ20.1), mapping supporters and detractors and learning how they influence the risks we seek to address.

We will also draw on our experience: In Bolivia, work with ABT taught us that consultations with indigenous communities are a vital prerequisite for difficult decisions, such as budget cuts, to ensure that the most severe corruption risks remain covered.

2) Validate risk selection methodologies: these have been extensively modified (References 2) to prioritise corruption risks that disproportionately impact not only conservation, but also poverty alleviation, and GESI, with partners and stakeholders.

3) Identify and prioritise risks: Based on our methodology (RQ20.4), a three-day Corruption Risk Assessment workshop with each partner will jointly map, analyse, and assess corruption risks in specific IWT-related institutional functions (example RQ20.5). Partners will rank risks to ensure scarce resources are efficiently used.

4) Design mitigation measures: Together with our in-country and international advisors, our partners will develop detailed risk mitigation measures for the top 2-3 identified risks per country. (1-4: Output 1)
Our survey shows that self-confidence in risk diagnosis is higher than in risk mitigation capability, allowing us to prioritize capacity building and measure progress (RQ20.3)

We will draw on our own experience as well as those in UMICs who have an increasingly solid track record, using matched funding (RQ20.6): in Peru, SERFOR (forestry authority) and two provinces have accumulated expertise digitising timber permits and operating high-risk area checkpoints using autonomous digital inspection tools. Indonesia's forestry state enterprise Perhutani has tackled timber sale conflict of interest risks to generate more state revenue.

Drawing on this experience, we will not be tackling grand corruption at the top political level, but the everyday corruption that disproportionately affects economically, politically or socially disaffected citizens. Through this focus on administrative corruption, we will strengthen the systemic controls in the procedures designed to reduce IWT, thereby reducing the likelihood they will be undermined through corruption.

5) Document: The partners will contribute their lessons learned to a database of mitigation measures tackling wildlife corruption risks to close the gap of each country currently starting from scratch. Being able to draw on the global experience will significantly shorten the development cycle and costs (Output 2).

6) Refine: Partners will present planned mitigation measures for peer review at the Wildlife Corruption Prevention Working Group (WCPWG). Draft documents will then be refined ahead of their implementation with the benefit of global experience, increasing the likelihood that measures deliver results (Output 3).

We learned how to facilitate international networks as co-founders of the Countering Environmental Corruption Practitioner's Forum under IWT128 and will model the WCPWG on the Forum's Follow-the-Money WG. It will bring together professionals with whom we have a direct relationship as result of efforts under Output 1. Due to the less confidential nature of these conversations in contrast to law enforcement, it will be easier to establish rapport and identify relevant similarities. We envision at least 12 working group meetings.

According to our Survey, all partners expressed a keen interest in learning from their peers, a crucial basis for Outputs 2 and 3 (RQ20.3).

7) Implement: With the support of our advisors, partners will implement mitigation measures. This is by far the most challenging phase of the programme and often requires the careful navigation of entrenched obstacles, lack of political will, and conflicting priorities. We will maintain a close relationship with partner agency leadership to navigate obstacles.

8) Evaluate and Adjust: Every six months, we will measure residual risks to assess effectiveness and adjust implementation. To measure the outcome of our programme, we will also conduct repeat survey measurements

of the Green Corruption Risk Management Confidence Index among our partners and collect qualitative change stories (Q29)

Q21. Capability and Capacity

How will the project support the strengthening of capability and capacity of identified local and national partners, and stakeholders during its lifetime organisational or individual levels?

Capacity building is at the very core of our global programming. This goes beyond awareness-raising and focuses on skill-building and hands-on support for learning through supported implementation. In this particular project, it will manifest through the following approaches:

Formalised training: in each country, we will conduct our three-day participatory corruption risk assessment workshop, which seeks to establish a common understanding of the corruption risk mitigation process by jointly analysing key administrative processes for corruption risks, scoring the likelihood and impact should these risks materialise, including the impact on conservation, poverty reduction, and GESI.

Risks are then prioritised in accordance with the finite available resources to address them. Mitigation measures are then creatively brainstormed to address these top-priority corruption risks. This time-consuming stage of the workshop concludes with identification of the mitigation measures which will be the focus of the programme.

Informal coaching and mentoring: through regular check-ins, we seek to augment the efforts especially of the anti-corruption officers at our partners during the implementation of mitigation measures. This process typically takes over a year and features weekly mentoring meetings with a core reform individual or team to share our expert's experience in a hands-on way.

Access to lessons learned: to ensure our partners continue to be able to draw on capacity building efforts, we will jointly distill the experience in the database of mitigation measures, which will persist even after our in-country mentors end their engagements at the conclusion of the project.

Finally, the peer learning process has been added as an innovation based on the theory that our partners' engagement and learning will be enhanced through international exchange to grapple with corruption prevention challenges and approaches outside their narrow domestic focus. Therefore, engaging partners in peer reviews of each other's mitigation measures ensure higher-quality mitigation measures and sustainability.

Q22. Gender Equality & Social Inclusion (GESI)

All applicants must consider how their project will contribute to promoting equality between persons of different gender and social characteristics. Please include reference to the GESI context in which your project seeks to work in.

The Countering Environmental Corruption Practitioner's Forum has consistently sought to investigate the combined negative impact of environmental crime and corruption on GESI. It has concluded (RQ22.1) that "women and men experience, participate in, profit and lose from corruption differently." Women and girls tend to be most affected by environmental corruption, as in many parts of the world they are the main users of natural resources, while at the same time face limited access to decision-making processes.

Our partners tend to be quite conservative in outlook, making even a diverse participation at events challenging. To address this, we will mainstream GESI throughout the project. A first project step is the selection and prioritization of corruption risks according to their likelihood and impact. We have included a GESI factor in the impact scoring (along with legal, reputational, financial, conservation and poverty reduction), meaning that risks that have a greater adverse impact on GESI, all other factors being equal, will score higher and be prioritized for targeting throughout the remainder of the project (RQ4.1).

As an illustration: risks related to non-transparent and inaccessible public services include permits, tickets or license issuing. Those on the “in” know how the systems work, but those socially excluded or disenfranchised can face an excessive burden to access these public services due to a lack of public information, unpredictable decision-making, and unconstrained discretion. They may be forced to engage in bribery to resolve this uncertainty and access even the public services they have full rights to access.

As part of the revised corruption impact scoring system that now includes GESI factors, such processes will receive higher priority for follow-on support than others with less GESI relevance. By prioritizing corruption risks which have a greater adverse impact on GESI over those which do not, we hope to address some of the inequalities that accompany greater corruption (RQ4.1).

We will measure progress against the targeted corruption mitigation measures through annual measurements of “residual risk,” which will determine what our efforts have achieved in regards to the “GESI Impact” measurement score (RQ4.1).

Programme approaches will learn from the experience of GESI-advanced partners. In Bolivia, for example, where 60% of forest land is owned by indigenous communities, our partner ABT incorporates these at the core of its operations, not as an add-on consideration. Heads of ABT have frequently had an indigenous background. With SERFOR in Peru, we have developed a statistics tool that for the first time started collecting GESI participant data, quickly highlighting the need for deliberate inclusion efforts. As part of the Working Group, we will ask these partners to share this experience.

Finally, there is a chance of unintentionally contributing to an increase in inequality or exclusion through our policy and procedure changes. To prevent this, the mitigation plans and measures developed will be presented for consultation with key community stakeholders to solicit feedback for improvement.

Q23. 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) and the potential to scale the approach.

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.

We contribute to the effectiveness of biodiversity conservation and poverty reduction efforts by reducing corruption risks. We do so by strengthening our wildlife agency partners’ ability to implement corruption risk mitigation measures since corruption negatively affects both anti-poverty efforts (RQ16.7) and conservation objectives (RQ16.9). To ensure that our modified risk selection methodology remains relevant for poverty reduction programmes, we have secured the engagement the Institute’s Poverty Reduction Advisor.

Our focus on tackling corruption vulnerabilities aims to enhance the efficacy of conservation policies and their implementation, and curtail leakages that undermine both service delivery and revenue generation. In times of ODA reduction, raising our partner’s capacity for revenue generation through a reduction in corruption-related leakage is a crucial prerequisite to maintain progress with poverty reduction. Revenue generation is a core element of our partners’ mandate: in Bolivia, for example, ABT has last year raised 150 mln Bolivares in licensing fees, on a budget of 50mln and amidst significant staff cuts. ABT’s ability to generate revenue is highly dependent on improving administrative processes, including the ones we will assist with.

Indirectly, our efforts help support poverty reduction by promoting more equitable access to policies, procedures, and their associated benefits - shifting away from the status quo of closed informal networks among

politically influential individuals to a more open, just, and democratic system from which many vulnerable populations, including women, indigenous communities, and other historically marginalised groups, have been excluded.

In the short term, we expect this work to a) improve wildlife agencies' awareness, understanding, and ability to reduce corruption vulnerabilities that undermine their anti-IWT efforts, and b) contribute to a growing body of practice in IWT-related corruption prevention for the benefit of other agencies connected through a global network. In the long term, the database of IWT-related corruption risk mitigation measures will pave the path to scalability (i.e. tackling more risks, new partners in the same countries, or new countries).

We will primarily focus on 5 integrity officers per country, a total of 15. Their purview includes their administrative entities' personnel, totaling 4'503 individuals (see QR23). Beyond these, we anticipate reaching all the individuals who utilise, benefit from, or are impacted by the services of these public institutions.

Q24. Pathway to change

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

The intended change of the project is improved effectiveness of biodiversity conservation and poverty reduction efforts in Malawi, Madagascar and Bolivia, by way of supporting partner wildlife agencies to reduce corruption which has long undermined their ability to achieve their objectives (outcome).

The project aims to achieve this intended outcome by equipping partner agencies with skills needed to develop innovative mitigation measures to reduce administrative corruption (Output 1).

We seek to foster the effectiveness, sustainability and scalability of these mitigation efforts by establishing collaborative knowledge sharing mechanisms and South-South peer learning among our three partners as well as UMICs with recent reform experience. This economy of scale will generate significant resource savings as individual countries will no longer have to develop their own mitigation measures from the ground up but can benefit from peer learning, advice, and support. (Output 2)

Finally, we will ensure that these innovations actually yield results by reviewing and scrutinising planned interventions through a peer review mechanism that acts as an incubation chamber prior to deploying them.

This will ensure that mitigation measures have the benefit of both positive and negative experiences prior to their application, creating a higher likelihood of achieving their goals (Output 3).

Q25. Sustainable benefits and scaling potential

Q25a. How will the project reach a point where benefits can be sustained post-funding? How will the required knowledge and skills remain available to sustain the benefits? How will you ensure your data and evidence will be accessible to others?

We align the programme with our partner's existing institutional priorities to increase the likelihood that measures will continue. By creating a global Working Group for frequent technical exchanges as well as a senior-level Steering Committee that will include representatives from our partners in Bolivia, Madagascar and Malawi, our quarterly check-ins will continue to generate maximum institutional support.

While we see our engagement in partner countries as long term, this does not mean that partners will remain statically dependent. Rather, we seek to create policies, guidelines, and systems, which, accompanied with significant upfront support, can gradually pick up the slack as we reduce our support and shift from providing full-time single-agency advisors to roaming advisors. This will be possible since our advisors are local and thus

remain accessible to our partners. We continuously produce lessons learned and share them internally through monthly team meetings and externally on the newly created database.

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

- [Rd11St2 Global Prevention References FINAL](#)
- 31/03/2025
- 10:14:48
- pdf 816.25 KB

Section 7 - Risk Management

Q26. Risk Management

Please outline the 7 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, two Safeguarding, and one Delivery Chain Risk.

Risk Description	Impact	Prob.	Inherent Risk	Mitigation	Residual Risk
Fiduciary Fraud or theft of project resources, timesheet fraud	Major	Unlikely	Major	The main reason that we dont transfer funds to government partners is to mitigate fiduciary risk. Accordingly, we are able to keep financial risks low in our projects. By minimising procurement, sub- contracting and handling of cash, standard controls are deemed sufficient. Timesheet fraud risks will be mitigated through supervisor reviews.	Minor
Safeguarding (SEAH) 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 will mainstream safeguarding to stakeholders during risk assessments.	Moderate

Safeguarding (HSS)	Key HSS risk relates to car and other road-related incidents.	Major	Possible	Major	Where public transport is unavailable, we require only reputable taxis be utilised.	Moderate
Delivery Chain	Lack of political buy-in does not create a sufficiently strong supporting environment for uptake of CRA methodologies.	Major	Likely	Major	This programme's network is designed to address this challenge: sharing coping mechanisms for CRA Experts is a key tool to mitigate this risk. Nonetheless, top political buy-in to address corruption risks might ebb. Formal agreements exist with Bolivia, Malawi and Madagascar and will be referenced when support wanes.	Moderate
Risk 5	Key Staff risks	Moderate	Possible	Moderate	Corruption Prevention Specialist positions will be sensitive to fill, requiring technical skills, cultural sensitivity, but also partner and stakeholder trust allowing access to sensitive materials. Should there be a staffing disruption, Basel will engage its in-house advisors specialising in preventing environmental corruption until a replacement is found.	minor
Risk 6	Security risks for advisors	Major	Unlikely	Moderate	Environmental syndicates and corrupt officials can be dangerous. Basel advisors are experienced in physical risk mitigation and enhancing standard protocols for this project with: a very low profile/no public visibility, constant stakeholder communications, strict cyber security and avoiding discussions about cases of corruption, as opposed to the more theoretical "cases"	minor

Risk 7	Partners are not willing to share their experiences or open up on challenges, undermining peer review efforts.	Possible	Moderate	Moderate	Work with individual partners to increase comfort levels. Suggest abstract, neutralized sharing through Basel Institute, remove country/agency identifiers. determines source of concern. add new security protocols. Consider double blind reviews.	Minor
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Please upload your Risk Register, with Delivery Chain Risk Map, here.

No Response

Section 8 - Project Sensitivities and Workplan

Q27. Project sensitivities

Please indicate whether there are sensitivities associated with this project that need to be considered if details are published (detailed species location data that would increase threats, political sensitivities, prosecutions for illegal activities, security of staff etc.).

Yes

Please provide brief details.

[Redacted content]

Q28. Workplan

Provide a project workplan that shows the key milestones in project activities.

- [Global Prevention workplan](#)
- 30/03/2025
- 22:23:59
- pdf 152.71 KB

Section 9 - Monitoring and Evaluation

Q29. 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).

At the start of the project, all team members and in-country partners will gather in a workshop to discuss the logframe including indicator targets and the activities to ensure buy-in, ensure that all team members and partners will work towards the same objectives, and mitigate challenges that may arise in the future. Where adjustments are needed, we will propose these through change requests. During the project implementation, weekly country calls led by Project Leader with in-country embedded advisors will monitor: 1) progress against output and outcome indicators, 2) planned activities and 3) relevant development that may affect the project operations and achievement.

Challenges and solutions will be identified in these calls, allowing the project to continue to run. Monthly calls with project partners will monitor the same topics and address challenges together. These in-country monitoring activities will be done especially for indicators related to Output 1 covering mitigation measure design and capacity building which requires frequent in-country coordination. Additionally, we will undertake monthly meetings with all of the field teams from the project countries. This Project Leader-chaired meeting will discuss status of mitigation measure implementation, successes and challenges in relation to achieving target indicators and look to allocate advisory resources across countries and workstreams to be aligned with absorption capacity.

On a quarterly basis, the Programme Manager (PM) will check achievement against indicators and coordinate evidence collection and quality control. In line with the quarterly financial reporting cycle at the Institute, budget monitoring will also be done by the PM and Project Leader to assess spending trends and whether resources that have been spent are good value for money. This will inform the project management team to decide whether reallocation of resources may be needed and programme activities need to be shifted. The result of this monitoring will be communicated in the regular meetings mentioned above to ensure that the program team is well aware of actions that need to be taken. On a six-monthly basis and in conjunction with semester reporting, Global Steering Committee meetings featuring the entire project team and representatives from all three project partner countries will review achievements, identify what worked and did not work, identify the reasons, and develop a strategy to improve the assistance. Impact evaluation surveys will be done for formalised capacity building events, measured six months after the training and analysed by the PM.

Finally, Outcome targets will be measured through a mixture of qualitative (“change stories” based on interviews and research) and quantitative (a repeat of the recently-conducted survey of partner countries to determine progress in the confidence of mitigating corruption risks Green Corruption Risk Mitigation Confidence Index (GCRMCI).

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

██████

Section 10 - Logical Framework & Standard Indicators

Q30a. Logical Framework (logframe)

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.

- [GlobalNetworkLogFrame_FINAL](#)
- 31/03/2025
- 20:15:27
- pdf 77.76 KB

Impact:

The effectiveness of biodiversity conservation efforts in Bolivia, Malawi, and Madagascar is increased as a result of reduced corruption risks.

Outcome:

Partner wildlife and forestry agencies in Bolivia, Malawi, and Madagascar reduce the internal corruption risks that undermine conservation policy effectiveness.

Project Outputs

Output 1:

Partners are equipped to map, analyse, evaluate, prioritise and mitigate IWT-related corruption risk.

Output 2:

Partners establish collaborative knowledge sharing, peer-to-peer learning and global best practice database

Output 3:

Partner agencies incorporate lessons learned into their internal controls.

Output 4:

No Response

Output 5:

No Response

Do you require more Output fields?

- Yes
- 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 Modify existing corruption risk assessment methodology to prioritize risks that have a disproportionate undermining impact on a) conservation policies, b) poverty reduction efforts and c) GESI.

1.2. With new methodology, conduct Corruption Risk Assessments of key business processes in Malawi, Bolivia and Madagascar, identifying those risks that are most likely to affect conservation efforts.

1.3. As part of the Steering Committee, jointly select business processes that are both important and have realistic paths to be reduced.

1.4. Workshops in each country on risk mitigation development.

1.5. Jointly develop mitigation measures to address the selected corruption vulnerabilities with each partner agency (such as codes of ethics, procurement guidelines, internal investigation policies, whistleblower systems, etc.)

1.6. Once designed, support partner agencies in overcoming resistance to mitigation measure implementation

through top-level engagement, coaching and administrative support (engage Ukraine, Indonesia and Peru as advisors).

1.7. Bilaterally and in Global Steering Committee, conduct regular review of mitigation measure implementation, identify technical, administrative and political obstacles, and commit resources to address them or, where unrealistic, pivot to backup mitigation measures.

1.8. Develop a qualitative study (“Change Stories”) on each of the mitigation measures to determine how effective they have been at boosting the impact of the conservation policies that corruption has historically undermined.

1.9. Conduct a re-run of the 2024 survey of partner entities in early 2026 and early 2028 to determine progress in improving scores in the Green Corruption Risk Mitigation Confidence Index (GCRMCI).

2.1. Draft Terms of Reference for Best Practices and Sample Mitigation Measure Database

2.2. Work with Global Steering Committee to fine-tune design of the database.

2.3. Implement the technical design of the database.

2.4. Collect experiences, best practices, and templates for inclusion in the database from our partner agencies and network.

2.5. Prepare the test version of the database and collect partner and external feedback

2.6. Improve the design and finalize.

2.7. Develop a communications plan to promote the existence and use of the database

2.8. Implement communications and promotions plan.

2.9. Design sustainability plan for database, including hosting, continued financing and management.

3.1. Design Terms of Reference for Corruption Prevention Working Group under Countering Environmental Corruption Practitioner’s Forum.

3.2. Draw up a list of potential members for the Working Group beyond current membership. Also invite relevant DEFRA grantees.

3.3. Finalize TOR and conduct regular (every other month) meetings of working group.

3.4. As part of Working groups, design feedback mechanisms on proposed mitigation measures for peer review by partners.

3.5. Encourage partners to present their innovations and challenges in the working group to foster the sharing of good practices.

3.6. Track innovations and experience in the database as part of Output 2.

3.7. Where relevant, facilitate direct partner collaboration between relevant technical expertise matches in partner countries.

3.8. Conduct evaluation of the utility of the Working Group on a regular basis (after every meeting) to ensure it remains partner-relevant.

Governance

Setting up of the Steering Committee with decision-maker level official participation

Conduct semi-annual Steering Committee meetings, aligned with reporting cycles

Circulate meeting notes

Adjust programming based on Steering Committee feedback

Reporting

Semi-Annual Report Preparation

Annual Report Preparation

Final report drafting

M&E Review

Q30b. Standard Indicators

Standard Indicator Ref & Wording	Project Output or Outcome this links to	Target number by project end	Provide disaggregated targets here
e.g. IWTCF-A01: Number of people reporting they are applying new capabilities (skills and knowledge) 6 (or more) months after training	e.g. Output indicator 3.4 / Output 3	e.g. 60	e.g. Kenya, 30 non-indigenous women; 30 non-indigenous men
IWTCF-B16: No of policies & frameworks developed o formally contributed and being implemented	Output 1	20	3 countries, 4 agencies, 7 Types
IWTCF-D01: No of people from eligible countries who have received structured and relevant training	Output 1	80	3 countries, 4 agencies, 50 men, 30 women
IWTCF-D04: Number of local or national organisations with enhanced capability and capacity	Output 1, Output 3	4	3 countries, 4 agencies
IWTCF-B15: Number of amendments to national laws and regulations in project country(ies)	Output 1, 2, 3	3	<i>No Response</i>
IWTCF-D02: No of people reporting they are applying new capabilities 6 or more months after training	Output 1	30	12 women, 18 men.
IWTCF-D10: Number of records added to accessible databases	Output 2	20	<i>No Response</i>
IWTCF-D16: Number of best practice guides and knowledge products published and endorsed	Output 2	10	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<i>No Response</i>	<i>No Response</i>	<i>No Response</i>
<i>No Response</i>	<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

Section 11 - Budget and Funding

Q31. 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.

- Budget - IWTCF Global Prevention FINAL
- 31/03/2025
- 09:49:25
- xlsx 100.62 KB

Q32. Alignment with other funding and activities

This question aims to help us understand how familiar you are with other work in the geographic/thematic area, and how this proposed project will build on or align with this to avoid any risks of duplicating or conflicting activities.

Is this new work or does it build on existing/past activities (delivered by anyone and funded through any source)?

- Yes

Please give details.

Globally, we are building on the knowledge acquired through USAID's Targeting Natural Resources Corruption programme, which we co-implemented and which allowed us to adapt our corruption prevention toolkit to the environmental space. We are also learning how to manage multinational working groups through IWT128.

In Madagascar, we build on the experience of the USAID-funded Consortium "Countering Corruption and Wildlife Trafficking" by WWF, TRAFFIC, Transparency International, and Alliance Voahary Gasy (AVG)

In Malawi, we learn from our own work (IWT117), as well as the FCDO-funded Targeting Serious Organized Corruption programme, which helps us understand the context and build relationships. We are also learning from LWT's IWTCF and other programming, as well as the USAID/FCDO Modern Cooking programme, which targets deforestation.

In Bolivia, there is limited programming in place due to the challenging political environment. Our own, INL and ISF funded engagements have given us a better understanding of the situation, built relationships and piloted first tools.

Q32b. Are you aware of any current or future plans for work in the geographic/thematic area 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.

At the global level, we are not aware of overlapping plans on environmental corruption prevention. The Nature Crime Alliance or the UNCAC Coalition do have programming on environmental corruption, but it focuses on the private sector's and civil society's role. We coordinate with both as our efforts are complementary.

At the national level, there is also limited overlap.

UNODC conducts corruption prevention programming in Malawi, Bolivia and Madagascar, and we collaborate closely to avoid duplication. When activities are similar, we join forces, as we have done with previous corruption risk assessment workshops.

In Madagascar, the USAID programme would have been similar, but it has been cancelled. A tangentially similar GIZ programme has also ended.

In Bolivia, we are not aware of any similar programming.

Q33. Balance of budget spend

Defra are keen to see as much IWT Challenge Fund funding as possible directly benefiting communities and economies. While it is appreciated that this is not always possible every effort should be made for funds to remain in-country.

Explain the thinking behind your budget in terms of where IWT Challenge Fund funds will be spent. What benefits will the country/ies see from your budget? What level of the award do you expect will be spent locally? Please explain the decisions behind any IWT Challenge Fund funding that will not be spent locally and how those costs are important for the project.

Of note, our partners are government entities, and we do not, as a core principle, transfer funds to them. For over 20 years, our work has focused on providing in-kind technical expertise, and we eschew programming where we would be expected to provide assets or cash, as it would undermine the professional, technical and trust-based relationship that we have carefully built and that is the basis of our work. Furthermore, we know that the agencies we work with have issues with integrity - that is precisely the reason we work with them! - and that is why we opt to provide our contribution to the partners (amounting to 43% of BCF funding) in-kind through technical expertise and events and travel, when programming warrants.

As we have proven through IWT128, which had a similar budget, we are able to operate at significant levels of granularity in multiple countries through this arrangement, while maintaining solid programmatic, financial and quality controls.

In the present budget, 64% will be spent in eligible countries. As the grant is part of a global network, we will be able to leverage significant matched funding, adding another 46% in value on top of the BCF funding.

Q34. Value for Money

Please demonstrate why your project is good value for money in terms of impact and cost-effectiveness of each pound spend (economy, efficiency, effectiveness and equity). Why is it the best feasible project for the amount of money to be spent?

In our project, we will build VfM into every stage of the project lifecycle. Costs and inputs are driven by value-based decision-making from the start, informed by evidence-based understanding of what key design and delivery decisions are driving project costs. These approaches are applied in the 4Es below, which we will use to develop a VfM framework indicators that will be monitored on quarterly basis:

Economy-in ensuring the inputs (staff and non-staff expenses) are the appropriate quality at the right price, rates are benchmarked against similar role and using clearly documented rates for existing staff, and applying our

procurement policy for goods/service purchase.

Efficiency-the biggest input of this project (staff) will be using our tested model to respond to partner's needs, utilising our global experience while cognisant of political economy realities. This will be achieved through combining in-country advisory/mentoring with HQ-expert support (Q33). Lessons from our Follow-the-Money network will be reflected in this project.

Effectiveness-the intended outcomes of this project is reduced corruption risks that undermine conservation, measured by the number of anti-corruption policies/frameworks and GCMRC index, as well as qualitative assessment through Change Stories which capture key outcomes.

Equity-Corruption in natural resources and conservation can further marginalise women and other groups already facing power inequity and who rely on environmental resources for their livelihood (Q16.9). By reducing corruption opportunities, we anticipate that these vulnerable communities will also benefit. Governments can use funds saved for public services, and improve gender equality and social inclusion.

Q35. Capital items

If you plan to purchase capital items with IWT Challenge Fund 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.

Only capital items are laptops, which we continue to use if they are functional, offsetting costs in other projects.

Q36. Safeguarding

Q37. Ethics

Outline your approach to meeting the key principles of good ethical practice, as outlined in the guidance. The Institute's Code of Ethics guides all work carried out by the Basel Institute and is publicly accessible on our website. All staff, consultant and service providers are obliged to abide by this Code. It forms an integral part of their employment/service contractual arrangement with the Basel Institute.

Our principles involve, in criminal casework, the ethical sourcing of 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 that are tested for unintended consequences. No corruption prevention measure is one-size-fits all and mitigation measures need to be driven by local engagement to be effective and sustainable.

We have restricted visibility of the programme to adhere to our ethical obligation to safeguard our staff and partners and to give greater ownership of achievements to our partners. 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.

Our research activities adhere to Prior Informed Consent rules enshrined in our Ethical Guidelines for Research. All our ethical guidelines are periodically updated.

Section 13 - FCDO Notifications

Q38. British embassy or high commission engagement

It is important for UK Government representatives to understand if UK funding might be spent in the project country/ies. Please indicate if you have contacted the relevant British 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.

- UK Embassy support letters
31/03/2025
- 15:41:51
- pdf 414.26 KB

Section 14 - Project Staff

Q39. 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	20	Checked
Amanda Cabrejo le Roux	Senior Specialist and Deputy Director, Green Corruption	10	Checked
Taradhinta Suryandari	Programme Manager	20	Checked
Dafv Faramalala Andriambaranv	Madagascar Specialist, Green Corruption Prevention,	100	Checked

Do you require more fields?

Yes

Name (First name, Surname)	Role	% time on project	1 page CV or job description attached?
Twapa Tupalishe Ghambi	Specialist Green Corruption Prevention, Malawi	100	Checked
Orfan Saldana	Specialist Green Corruption Prevention, Bolivia	70	Checked

Aldo Bautista Echazu	Senior Specialist, Green Corruption Prevention	30	Checked
Claudia Baez Camargo	Poverty Reduction Advisor and Director, Prevention, Research and Innovation	3	Checked
Isis Gaeta Falcone	Specialist, Finance	5	Checked
Teresa Paonessa	[REDACTED]	2	Checked
No Response	No Response	No Response	Unchecked
No Response	No Response	No Response	Unchecked

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

- CV_global_prevention
- 02/04/2025
- 13:36:59
- pdf 3.98 MB

Have you attached all project staff CVs?

- Yes

Section 15 - Project Partners

Q40. Project Partners

Please list all the Project Partners (including the Lead Partner who will administer the grant and coordinate the delivery of the project), clearly setting out their roles and responsibilities in the project including the extent of their engagement so far.

This section should demonstrate the capability and capacity of the Project Partners to successfully deliver the project, ideally evidencing meaningful and early engagement in the co-design of your project.

Lead partner name: Basel Institute on Governance


Website address: www.baselgovernance.org

The Basel Institute's Green Corruption programme is the leading centre of excellence in addressing environmental corruption, with significant in-house expertise in corruption prevention in the eight countries it operates in. It has an in-house pool of over 10 full time environmental corruption prevention experts it draws on to implement its programmes.

Why is this organisation the Lead Organisation, and what value to they bring to the project? (including roles, responsibilities and capabilities and capacity):

From a management perspective, the Basel Institute has managed four grants with DEFRA funding, as well as dozens from other donors, all with positive audits. The Institute is the only partner with significant experience managing donor funds and the systems that allow compliance with DEFRA and FCDO regulations.

Finally, the Institute's Green Corruption programme has build a deep trust-based relationship with partners in all three countries as well as dozens others, which is a crucial element in this sensitive topic, where partners will have to be comfortable sharing their vulnerabilities.

International/ In-country Partner	International
Allocated budget (proportion or value):	
Representation on the Project Board (or other management structure):	<input type="checkbox"/> Yes
Have you included a Letter of Support from this organisation?	<input type="checkbox"/> Yes

Do you have partners involved in the Project?

Yes

1. Partner Name: Authority for Supervision and Social Control of Forests and Land - ABT

Website address: <https://abt.gob.bo/> <https://www.facebook.com/share/18tXnEY4q9/>

ABT is the institution responsible for enforcing laws and technical standards for the conservation of forests and land in Bolivia. It regulates, controls, and supervises the use of forest resources. Its mission is to contribute to sustainable rural development through the management of forests, democratising access, guaranteeing benefits for forest and land users, contributing to the economic growth of the sector and the Plurinational State (Bolivia).

What value does this Partner bring to the project? (including roles, responsibilities and capabilities and capacity):

The Amazon basin in Bolivia covers an area of more than 714 thousand km², which represents the 65% of the entire country. This basin has 5 biomes of which the Amazon Biome is the most large represented 67% of all Amazon basin and 43% of the entire national territory

Its functions of issuing regulations, granting rights, control and supervision over the management of forest resources are fundamental for the conservation and sustainable development of Bolivia's forests. However, the aforementioned competencies also represent contexts of high risk of corruption, which the programme plans to assisting in mitigating.

We have consulted ABT extensively during recent joint events in Bolivia. The strengthening of capacities and the positive results of technical assistance in the implementation of risk management under current programming has generated significant commitment in corruption prevention activities by ABT managers and technical staff.

Explain how you have involved this partner within the development of the project and their expected role during its implementation.

Currently, the ABT has a corruption risk prevention plan in the wood value chain formulated with the assistance of our advisors, which is also being implemented with our assistance.

ABT confirms its commitment to the continued analysis of a range of operational risks, with special emphasis on those present in relation to indigenous and economically disadvantaged groups, considering that approximately 60% of the areas under management plans Forestry (PGMF) in Bolivia are within the lands of indigenous peoples and communities.

Likewise, its functions at the national level generate possibilities to strengthen corruption prevention at a strategic level.

International/ In-country Partner

In-country

Allocated budget (proportion or value):



Representation on the Project Board (or other management structure):

Yes

Have you included a Letter of Support from this organisation?

Yes

2. Partner Name: Ministry of the Environment and Sustainable Development (Ministère de l'Environnement et du Développement Durable-MEDD)

Website address: <https://www.environnement.mg/>

What value does this Partner bring to the project? (including roles, responsibilities and capabilities and capacity):

The MEDD has a central role as its mandate is to develop and update policy, strategic and legal frameworks to strengthen environmental and forest governance. It represents the government at national and international level on environmental, climate and development issues, while ensuring that the environmental dimension is integrated into all sectoral and local policies. Finally, it ensures the sustainable management of protected areas, implements reforestation strategies and promotes sustainable development projects in rural and urban areas.

Madagascar has 123 protected areas, including 101 terrestrial and 22 marine protected areas, with a total surface area of 7,612,346 ha covering terrestrial, aquatic and marine ecosystems. They are managed by the Department of Protected Areas, Renewable Natural Resources and Ecosystems of the MEDD.

The MEDD also has a dedicated anti-corruption unit: the Direction de Lutte Contre la Corruption (DULCC) that has the mandate to conduct awareness initiatives, preventive actions and investigations across the Ministry.

Explain how you have involved this partner within the development of the project and their expected role during its implementation.

The MEDD is an active partner of our current - enforcement-focused - project IWT128 and we had various consultation on project design for this proposal with the Director of the Ministry's anti-corruption unit DULCC. The Minister himself had expressed great interest when we proposed this new collaboration that would expand our collaboration from enforcement to also include corruption prevention and he himself signed the letter of support.

The active role of the MEDD will be central, we'll collaborate closely with DULCC to build capacity of its staff and support them in assessing corruption risks and designing mitigation measures. They will also be involved in peer-learning across partner countries.

International/ In-country Partner In-country

Allocated budget (proportion or value): ██████████

Representation on the Project Board (or other management structure): Yes

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

3. Partner Name: Malawi Department of National Parks and Wildlife

Website address: *No Response*

What value does this Partner bring to the project? (including roles, responsibilities and capabilities and capacity):

The Department of National Parks and Wildlife (DNPW) is responsible for the management and conservation of wildlife resources in Malawi. Its mission is to conserve and manage protected areas and wildlife for present and future Malawians through enforcement of wildlife legislation, adaptive management, effective monitoring and governance.

To fight IWT, DNPW has enforcement powers. For this project we will collaborate with prevention actors to jointly design prevention mitigations with the Internal Integrity Committee (IIC) and train IIC members to be able to build on developments jointly designed under IWT117.

Explain how you have involved this partner within the development of the project and their expected role during its implementation.

We provide ongoing technical support to DNPW on cases and we consulted DNPW leadership and technical staff in various instances, including during the recent Steering Committee for IWT128.

Active participation is expected with IIC members receiving mentoring and/or training from the project.

The leadership of DNPW will serve on the Steering Committee of the project.

International/ In-country Partner In-country

Allocated budget (proportion or value): ██████████

Representation on the Project Board (or other management structure): Yes

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

4. Partner Name: Department of Forestry, Malawi

Website address: <https://www.facebook.com/p/Department-of-Forestry-100067197665608/>

What value does this Partner bring to the project? (including roles, responsibilities and capabilities and capacity):

The Department of Forestry is one of the departments under the Ministry of Natural Resources, Energy and Mining and is responsible for the management and conservation of forests in Malawi.

To fight the illicit trade in forest products, the DoF engages in both enforcement and prevention efforts. The DoF will contribute via the involvement of its Institutional Integrity Committee (IIC).

Explain how you have involved this partner within the development of the project and their expected role during its implementation.

We provide ongoing technical support to DoF on cases and we consulted DoF leadership and technical staff in various instances, including during the recent Steering Committee of IWT128.

Active participation is expected with IIC members receiving mentoring and/or training from the project.

The leadership of DoF will serve on the Steering Committee of the project.

International/ In-country Partner In-country

Allocated budget (proportion or value): ██████████

Representation on the Project Board (or other management structure): Yes

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

5. Partner Name: *No Response*

Website address: *No Response*

What value does this Partner bring to the project? (including roles, responsibilities and capabilities and capacity): *No Response*

Explain how you have involved this partner within the development of the project and their expected role during its implementation. *No Response*

International/ In-country Partner *No Response*

Allocated budget (proportion or value): *No Response*

Representation on the Project Board (or other management structure): Yes
 No

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

6. Partner Name: *No Response*

Website address: *No Response*

What value does this Partner bring to the project? (including roles, responsibilities and capabilities and capacity): *No Response*

Explain how you have involved this partner within the development of the project and their expected role during its implementation. *No Response*

International/ In-country Partner *No Response*

Allocated budget (proportion or value): *No Response*

Representation on the Project Board (or other management structure): 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 combined PDF of all letters of support in the order they are presented in the table.

- BCF 11-2 Global Prevention Support Letters Mer
ged
- 31/03/2025
- 08:06:36
- pdf 6.77 MB

Section 16 - Lead Org Capability and Capacity

Q41. Lead Organisation Capability and Capacity

Has your organisation been awarded Biodiversity Challenge Funds (Darwin Initiative, Darwin Plus or Illegal Wildlife Trade 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
128	Amanda Cabrejo le Roux	Building a follow-the-money network to target environmental crime syndicates
117	Juhani Grossmann	Empowering Malawi's government agencies to control wildlife crime related corruption
092	Juhani Grossmann	Disrupting the financing of Andean IWT networks through asset recovery
088	Juhani Grossmann	Holding Uganda-based transnational wildlife criminals accountable by empowering financial investigations
No Response	No Response	No Response
No Response	No Response	No Response

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

Yes

Section 17 - Certification

Certification

On behalf of the

Company

of

Basel Institute on Governance

I apply for a grant of

£558,665.00

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 key project personnel, a cover letter, letters of support, a budget, logframe, Safeguarding and associated policies, and project workplan (uploaded at appropriate points in the application).

- Our last two sets of signed audited/independently verified accounts and annual report (covering three years) are also enclosed.

Checked

Name	Juhani Grossmann
Position in the organisation	Director, Green Corruption
Signature (please upload e-signature)	<input type="checkbox"/> <u>Juhani signature high res (1)</u> <input type="checkbox"/> 31/03/2025 <input type="checkbox"/> 08:12:48 <input type="checkbox"/> png 408.25 KB
Date	31 March 2025

Please attach the requested signed audited/independently examined accounts.

- | | |
|--|--|
| <input type="checkbox"/> <u>BIOG - Audit report 2023-sig</u> <input type="checkbox"/>
31/03/2025
<input type="checkbox"/> 08:10:51
<input type="checkbox"/> pdf 2.48 MB | <input type="checkbox"/> <u>BIOG - Audit report 2022-sig</u> <input type="checkbox"/>
31/03/2025
<input type="checkbox"/> 08:10:51
<input type="checkbox"/> pdf 2.31 MB |
|--|--|

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

- | | |
|--|---|
| <input type="checkbox"/> <u>Security Policy and Guidelines</u> <input type="checkbox"/>
31/03/2025
<input type="checkbox"/> 08:11:00
<input type="checkbox"/> pdf 369.23 KB | <input type="checkbox"/> <u>Whistleblowing (WB) Policy</u> <input type="checkbox"/>
31/03/2025
<input type="checkbox"/> 08:11:00
<input type="checkbox"/> pdf 229.7 KB |
| <input type="checkbox"/> <u>Code of Ethics</u> <input type="checkbox"/>
31/03/2025
<input type="checkbox"/> 08:11:00
<input type="checkbox"/> pdf 241.62 KB | <input type="checkbox"/> <u>Safeguarding Policy</u> <input type="checkbox"/>
31/03/2025
<input type="checkbox"/> 08:11:00
<input type="checkbox"/> pdf 233.59 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", "Standard Indicator Guidance", "Risk Guidance", "Theory of Change Guidance" and "Finance Guidance".	Checked
I have read, and can meet, the current Terms and Conditions for this fund.	Checked
I have provided <u>actual start and end dates for the project.</u>	Checked
I have provided my <u>budget based on UK government financial years i.e. 1 April – 31 March and in GBP.</u>	Checked

I have checked that our <u>budget is complete, correctly adds up and I have included the correct final total at the start of the application.</u>	Checked
The application been <u>signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).</u>	Checked
I have attached the below documents to my application:	
• <u>a cover letter from the Lead Organisation</u>	Checked
• <u>my risk register, including delivery chain risk map, as an Excel file using the template provided (Extra only).</u>	Checked
• <u>my completed logframe as a PDF using the template provided and using “Monitoring Evaluation and Learning Guidance” and “Standard Indicator Guidance”.</u>	Checked
• <u>my 1 page Theory of Change as a PDF which includes the key elements listed in the guidance (Extra only)</u>	Checked
• <u>my budget (which meets the requirements above) using the template provided.</u>	Checked
• <u>a signed copy of the last 2 annual report and accounts (covering three years) for the Lead Organisation, or provided an explanation if not.</u>	Checked
• <u>my completed workplan as a PDF using the template provided.</u>	Checked
• <u>a copy of the Lead Organisation’s Safeguarding Policy, Whistleblowing Policy and Code of Conduct (Question 35).</u>	Checked
• <u>1 page CV or job description for all the Project Staff identified at Question 38, including the Project Leader, or provided an explanation of why not, combined into a single PDF.</u>	Checked
• <u>a letter of support from the Lead Organisation and partner(s) identified at Question 39, or an explanation of why not, as a single PDF.</u>	Checked
I have <u>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.</u>	Checked
My additional supporting evidence is in line with the requested evidence, amounts to a maximum of 5 sides of A4, and is combined as a single PDF.	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 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 IWT Challenge Fund and our sister grant scheme, the Darwin

Initiative. 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.

Checked

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 IWT Challenge Fund including project details (usually title, lead organisation, project leader, location, and total grant value).

Project Title: Building a global network to prevent biodiversity-related corruption.

	Activity	No. of months	Year 1 (25/26)		Year 2 (26/27)				Year 3 (27/28)				Year 4 (28/29)	
			Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
Output 1: Partners are equipped to map, analyse, evaluate, prioritise and mitigate IWT-related corruption risk.														
1.1	Verify new corruption risk assessment methodology to prioritize risks that have a disproportionate undermining impact on a) conservation policies, b) poverty reduction efforts and c) GESI.	2												
1.2	With new methodology, conduct Corruption Risk Assessments of key business processes in Malawi, Bolivia and Madagascar, identifying those risks that are most likely to affect conservation efforts.													
	Malawi	1												
	Madagascar	1												
	Bolivia	1												
1.3	As part of the Steering Committee, jointly select business processes that are both important and have realistic paths to be reduced.	1												
1.4	Workshops in each country on risk mitigation development.													
	Malawi	1												
	Madagascar	1												
	Bolivia	1												
1.5	Jointly develop mitigation measures to address the selected corruption vulnerabilities with each partner agency (such as codes of ethics procurement guidelines, internal investigation policies, whistleblower systems, etc.)													
	Malawi	1												
	Madagascar	1												
	Bolivia	1												

Project Title: Building a global network to prevent biodiversity-related corruption.

	Activity	No. of months	Year 1 (25/26)		Year 2 (26/27)				Year 3 (27/28)				Year 4 (28/29)		
			Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	
1.6	Once designed, support partner agencies in overcoming resistance to mitigation measure implementation through top-level engagement, coaching and administrative support (engage Ukraine, Indonesia and Peru as advisors through matched funding).														
	Malawi	27				■	■	■	■	■	■	■	■	■	■
	Madagascar	24					■	■	■	■	■	■	■	■	■
	Bolivia	21						■	■	■	■	■	■	■	■
1.7	Bilaterally and in Global Steering Committee, conduct regular review of mitigation measure implementation, identify technical, administrative and political obstacles, and commit resources to address them or, where unrealistic, pivot to backup mitigation measures.	5			■		■		■		■		■		
1.8	Develop a qualitative study (“Change Stories”) on each of the mitigation measures to determine how effective they have been at boosting the impact of the conservation policies that corruption has historically undermined.	3				■				■				■	
1.9	Conduct a re-run of the 2024 survey of partner entities in early 2026 and early 2028 to determine progress in improving scores in the Green Corruption Risk Mitigation Confidence Index (GCRMCI).					■				■				■	
Output 2: Partners establish collaborative knowledge sharing, peer-to-peer learning and global best practice database															
2.1	Draft Terms of Reference for Best Practices and Sample Mitigation Measure Database	2	■												
2.2	Work with Global Steering Committee to fine-tune design of the database.	2		■											
2.3	Implement the technical design of the database.	3			■	■									
2.4	Collect experiences, best practices, and templates for inclusion in the database from our partner agencies and network.	27				■	■	■	■	■	■	■	■	■	■
2.5	Prepare the test version of the database and collect partner and external feedback	4			■	■									

Project Title: Building a global network to prevent biodiversity-related corruption.

	Activity	No. of months	Year 1 (25/26)		Year 2 (26/27)				Year 3 (27/28)				Year 4 (28/29)		
			Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	C1	Q2	
2.6	Improve the design and finalize.	1				■									
2.7	Develop a communications plan to promote the existence and use of the database	2				■	■								
2.8	Implement communications and promotions plan.	16					■	■	■	■	■	■	■		
2.9	Design sustainability plan for database, including hosting, continued financing and management.	3	■										■	■	
Output 3: Partner agencies incorporate lessons learned into their internal controls.															
3.1	Design Terms of Reference for Corruption Prevention Working Group under Countering Environmental Corruption Practitioner’s Forum.		■												
3.2	Draw up a list of potential members for the Working Group beyond current membership. Also invite relevant DEFRA grantees.		■	■											
3.3	Finalize TOR and conduct regular (every other month) meetings of working group.	12			■	■	■	■	■	■	■	■	■	■	■
3.4	As part of Working groups, design feedback mechanisms on proposed mitigation measures for peer review by partners.	1			■										
3.5	Encourage partners to present their innovations and challenges in the working group to foster the sharing of good practices.	27			■	■	■	■	■	■	■	■	■	■	■
3.6	Track innovations and experience in the database as part of Output 2.	24				■	■	■	■	■	■	■	■	■	■
3.7	Facilitate direct partner collaboration between relevant technical expertise matches in partner countries.	27			■	■	■	■	■	■	■	■	■	■	■
3.8	Conduct evaluation of the utility of the Working Group on a regular basis (after every meeting) to ensure it remains partner-relevant.	12													
Governance															

Project Title: Building a global network to prevent biodiversity-related corruption.

	Activity	No. of months	Year 1 (25/26)		Year 2 (26/27)				Year 3 (27/28)				Year 4 (28/29)	
			Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
	Setting up of the Global Steering Committees with decision-maker level official participation	1	■											
	Conduct semi-annual Steering Committee meetings, aligned with reporting cycles	5			■		■		■		■		■	
	Circulate meeting notes	5			■		■		■		■		■	
	Adjust programming based on Steering Committee feedback	15				■		■		■		■		■
Reporting and M&E														
	Semi-Annual Report Preparation	3					■				■			
	Annual Report Preparation (will request merger with final annual report and final report based on previous experience)	3			■				■					
	Final report drafting	1											■	■
	M&E Review	9		■		■		■		■		■		■

Project Title: Building a global network to prevent biodiversity-related corruption

Project Summary	SMART Indicators (including disaggregated targets)	Means of Verification	Important Assumptions
<p>Impact: The effectiveness of biodiversity conservation efforts in Bolivia, Malawi, and Madagascar is increased as a result of reduced corruption risks.</p>			
<p>Outcome:</p> <p>Partner wildlife, and forestry agencies in Bolivia, Malawi, and Madagascar reduce the internal corruption risks that undermine conservation policy effectiveness.</p>	<p>0.1 Partner agencies implement anti-corruption policies</p> <p><u>Target:</u> 3 agencies implement a total of 5 new mitigation measures</p> <p><u>Baseline:</u> While all countries have national anti-corruption frameworks, we will, during project start-up assess the number of actually implemented anti-corruption measures in partner agencies.</p> <p>Y1: 1 agency implements 1 new measure Y2: 2 agencies implement 3 new measures Y3: 3 agencies implement 5 new measures</p> <p><u>Disaggregation:</u> Country; Policy change (New; Amended); Area of policy (codes of ethics, conflict of interest</p>	<p>0.1 Risk Assessment and prioritisation, Copies of policy documents. Annual reports referencing monitoring and implementation of policies.</p> <p>Additionally for each measure, a special qualitative assessment (“Change Stories”) will take place, reviewing internal documentation and statistics, where available and conducting interviews with partners and external/independent users of the policies to follow the decision chain and determine whether anti-corruption policies, guidelines or regulations are actually being enforced, adhered to, applied or otherwise used. Specific attention will be paid to determining those policies' impact on biodiversity conservation and poverty</p>	<p>0.1 - N.B. Reflection of previous experience and DEFRA report reviews indicates the development, proposal, and even adoption of corruption risk mitigation measures can be relatively quick, while actual implementation can take years. As such, we are measuring the production of such measures under Indicator 1.1, while we are measuring the outcome of implementation here through the Change Stories. These policies and frameworks could either be anti-corruption clauses in IWT-related regulations or self-standing anti-corruption regulations, such as codes of ethics, gifts and gratuities policies, internal investigation guidelines, whistleblowing and reporting systems, conflict of interest regulations, procurement rules, etc.)</p> <p>0.1 To be included, a policy or framework will have to demonstrate actual conservation and/or poverty reduction results. Depending on the policy, this could be resources saved, an increase in revenue collection, speeding up of public services, or other improvements in quality or increases in quantity. Where possible, we will utilize our partner’s own measurement systems.</p>

Project Title: Building a global network to prevent biodiversity-related corruption

	<p>policy, procurement guidelines, risk assessment methodologies, whistleblower regulations, international investigation policies, strengthening internal controls, other)</p> <p>0.2. Increase in Green Corruption Risk Mitigation Confidence Index (GCRMCI) scores by end of program</p> <p><u>Baselines (Oct. 2024):</u> <u>Africa, Diagnose: 3.64</u> <u>Africa, Mitigate: 3.42</u> <u>Latin America, Diagnose: 3.4</u> <u>Latin America, Mitigate: 3.42</u></p> <p><u>Targets for Year 1:</u> <u>Africa, Diagnose: 3.7</u> <u>Africa, Mitigate: 3.5</u> <u>Latin America, Diagnose: 3.5</u> <u>Latin America, Mitigate: 3.5</u></p> <p><u>Targets for Year 2:</u> <u>Africa, Diagnose: 3.9</u> <u>Africa, Mitigate: 3.7</u> <u>Latin America, Diagnose: 3.7</u> <u>Latin America, Mitigate: 3.7</u></p> <p><u>Targets for Y3:</u> <u>Africa, Diagnose: 4.04</u> <u>Africa, Mitigate: 3.82</u> <u>Latin America, Diagnose: 3.8</u></p>	<p>reduction. Collection will be ongoing basis, reported on semi-annual basis.</p> <p>0.2 Annual survey data among relevant partner agency staff on their agency’s capacity to diagnose and mitigate corruption risks will be collected by the program and reported annually, as per the established reporting schedule.</p>	<p>0.1 Mitigation measures are allocated sufficient resources (time, budget, political support) to be fully implemented</p> <p>0.2 We began collecting survey data from partner agency personnel regarding the perceived institutional capacity to diagnose and mitigate corruption risks (Green Corruption Risk Mitigation Confidence Index). Respondents are asked to rate their institution’s capacity to diagnose corruption risks and the effectiveness of mitigation measures, each on a scale of 1 (low) to 5 (high). Responses are averaged per region and will be collected on an annual basis. (See Reference file for more details.)</p> <p>0.2. Staffing remains relatively stable: all efforts will be made to contact the same individuals every year. Where staffing changes occur, some difference in opinion might influence the Index scores</p> <p>0.2. Confidence is a subjective measure, but we are building in an assumption that the degree of subjectivity remains relatively constant over time.</p> <p>0.2. We don't anticipate that the progression will be fully linear, so we have made the best assumptions about intermediate targets.</p> <p>0.2 Agency personnel respond to voluntary survey</p>
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Project Title: Building a global network to prevent biodiversity-related corruption

	<p><u>Latin America, Mitigate: 3.82</u></p> <p><u>Disaggregation: Region; Element (diagnose, mitigate)</u></p> <p>(see reference file section 12 for more details)</p>		
<p>Output 1. Partners are equipped to map, analyse, evaluate, prioritise and mitigate IWT-related corruption risk.</p>	<p>1.1 Number of partner agency staff who engage in assessment, analysis and planning activities</p> <p><u>Targets:</u> 50 staff from 3 agencies 40 % women</p> <p><u>Baseline:</u> 0</p> <p>Y1: 30 staff from 2 agencies Y2: 40 staff from 3 agencies Y3: 50 staff from 3 agencies</p>	<p>1.1 Basel report on engagement with partner institutions, risk assessment reports from partner institutions, mitigation proposals</p>	<p>1.1 - N.B. The approaches and tools captured here will stem from the conduct of the CRA training and resulting mitigation action plans and will be developed with program support. Specific mitigation measures could either be anti-corruption clauses in IWT-related regulations or self-standing anti-corruption regulations, such as codes of ethics, gifts and gratuities policies, internal investigation guidelines, whistleblowing and reporting systems, conflict of interest regulations, procurement rules, etc.)</p> <p><u>Assumptions:</u></p> <p>1.1.1 Partner institutions engage in constructive discussions on risk assessment 1.1.2 Partner institutions provide necessary data 1.1.3 Political will to adopt corruption mitigation measures 1.1.4 Political will by agency leaders to improve procedures 1.1.5 Partner institutions have authority to introduce mitigation measures</p>
	<p>1.2 Number of people from eligible countries who have received structured and relevant training (IWCT -D02)</p>	<p>1.2 Training and mentoring report(s), disaggregated by gender and indigenous status; agenda/course programme, documentation of participants'</p>	<p><u>Assumptions:</u></p> <p>1.2.1 Partner institutions assign personnel and allocate time for their training</p>

Project Title: Building a global network to prevent biodiversity-related corruption

<p>Baseline: 0</p> <p><u>Target:</u> 60 representatives (40% women) report 'improved' or 'significantly improved' skill,</p> <p>Year 1: 40 representatives Year 2: 60 representatives</p> <p><u>Disaggregation:</u> Country; Gender (men, women, other);</p> <p>1.3 Partner representatives apply new capabilities (skills and knowledge) 6 (or more) months after training (IWCTF - D02)</p> <p>Baseline: 0</p> <p><u>Targets:</u> 36 representatives report that they have used new skills and knowledge</p> <p>Y1: 20 representatives Y2: 36 representatives Y3: 36 representatives.</p> <p><u>Disaggregation:</u> Country; Gender (men; women; other); IPLC Status (IPLC; other); Focus area</p>	<p>achievement of course learning objectives; and photographic evidence reflecting course completion, post-training and mentoring surveys and questionnaires. Reported annually, as per the established DEFRA reporting schedule.</p> <p>1.3 Results of online surveys conducted by the Basel Institute of training and mentoring participants will be collected and reported six months after respective event completion, as per the established reporting schedule.</p>	<p>1.3.1 Partner institution management or human resources decisions do not prevent trained staff from using their skills in this way and staff is retained</p> <p>1.3.2 Training alumni respond to post-training online survey</p>
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Project Title: Building a global network to prevent biodiversity-related corruption

	(livelihoods; legal frameworks; enforcement; demand reduction)		
<p>Output 2: Partners establish collaborative knowledge sharing, peer-to-peer learning and global best practice database</p>	<p>2.1 Database of model mitigation measures, best practice guides and knowledge products on corruption risk mitigation used by partner agencies</p> <p><u>Targets: 20 resources authored by Institute or partners uploaded to database and 500 downloads by partners and stakeholders</u></p> <p><u>Y1: 5 resources uploaded, 50 downloads</u> <u>Y2:15 resources uploaded, 250 downloads</u> <u>Y3: 20 resources uploaded, 500 downloads</u></p> <p><u>Disaggregation:</u> Country; Type (model mitigation measures); Language</p>	<p>2.1 Knowledge products will be both actual measures (codes of conduct etc) and lessons learned from the implementation of IWT-related corruption risk mitigation measures. They will be collected by project staff for incorporation into the database and reported annually, as per the established reporting schedule.</p> <p>N.B. All model mitigation measures under indicator 1.1 will be produced in the originating country’s official language and will be translated into English. To avoid double-counting, we have only included English language products in our targets.</p>	<p><u>Assumptions:</u> 2.1 Interventions will reach sufficient maturity to generate evidence to support claims as “best practice”.</p> <p>2.1 Partner institutions willing to endorse products</p> <p>2.1 Partner institutions willing to publish and share mitigation measures</p> <p>2.1 Basel undertakes to host and manage the database for at least five years after project completion.</p>

Project Title: Building a global network to prevent biodiversity-related corruption

	<p>2.2. Model mitigation measures are utilized in whole or in part in the development of partner mitigation measures</p> <p>Baseline: 0,</p> <p>Target: 10 mitigation measures reflect lessons learned from partner resources.</p> <p>Y1: 3 Y2: 5 Y3: 10</p> <p><u>Disaggregation:</u> Country, type, year.</p>	<p>2.2. Narrative report on utilization of specific text or concepts from database in partner mitigation measure development. Where relevant, copies of texts, visuals, etc, will be included.</p> <p>NB mitigation measures do not have to be fully implemented yet to qualify for inclusion in this indicator, but rather progress towards full implementation made e.g. proposals made for legislative/regulatory changes, pilot schemes implemented etc..</p>	<p>2.2. Database contains sufficient model measures</p> <p>2.2. Language issues are resolved in reasonable fashion.</p> <p>2.3 model measures are sufficiently adaptable to all jurisdictions</p>
<p>Output 3: Partner agencies incorporate lessons learned into their internal controls.</p>	<p>3.1. Partner agencies participate in peer review activities</p> <p><u>Baseline:</u> 0</p> <p><u>Targets:</u> 10 draft mitigation measures from 3 agencies presented for peer review</p> <p>Y1: 3 mitigation measures from 2 agencies discussed/reviewed Y2: 7 mitigation measures from 3 agencies discussed/reviewed</p>	<p>3.1. Online working group recording/notes, presentation materials, attendance lists (disaggregated by gender and indigenous status), and event feedback forms will be collected by project staff and reported annually.</p> <p>3.1 As per IWTCF indicator guidance, 3.1 utilises targets for unique individuals to avoid double-counting among the multiple webinars we intend to host.</p> <p>3.2. Copies of peer review materials (where necessary,</p>	<p>N.B. Due to its global nature, the Working Group will utilise virtual webinars for its meetings. As such, attendance will be measured through Indicator 3.1, which tracks continued engagement of partners at the cross-country level.</p> <p><u>Assumptions:</u></p> <p>3.1.1 Government partners willing to adopt the guiding documents, join the network, be in the same forum and share experiences.</p> <p>3.1.2 Participants will have stable, reliable access to high-speed internet connections needed to participate in online sessions.</p> <p>3.2.1 Participants are willing and able to devote time to providing constructive feedback on members' mitigation measures</p>

Project Title: Building a global network to prevent biodiversity-related corruption

	<p>Y3: 10 mitigation measures from 3 agencies discussed/reviewed</p> <p><u>Disaggregation:</u> Country; topic of case study</p> <p>3.2 Partner’s adopt lessons learned.</p> <p>Baseline: 0</p> <p><u>Targets:</u> 15 Partners’ mitigation measures reflect lessons learned from peer review</p> <p>Y1: 2 Y2: 8, Y3:15</p>	<p>anonymized). Where peer reviews are provided online or in person, a short summary of inputs and recommendations</p>	
<p>1.1 Modify existing corruption risk assessment methodology to prioritize risks that have a disproportionate undermining impact on a) conservation policies, b) poverty reduction efforts and c) GESI.</p> <p>1.2. With new methodology, conduct Corruption Risk Assessments of key business processes in Malawi, Bolivia and Madagascar, identifying those risks that are most likely to affect conservation efforts.</p> <p>1.3. As part of the Steering Committee, jointly select business processes that are both important and have realistic paths to be reduced.</p> <p>1.4. Workshops in each country on risk mitigation development.</p> <p>1.5. Jointly develop mitigation measures to address the selected corruption vulnerabilities with each partner agency (such as codes of ethics, procurement guidelines, internal investigation policies, whistleblower systems, etc.)</p> <p>1.6. Once designed, support partner agencies in overcoming resistance to mitigation measure implementation through top-level engagement, coaching and administrative support (engage Ukraine, Indonesia and Peru as advisors).</p> <p>1.7. Bilaterally and in Global Steering Committee, conduct regular review of mitigation measure implementation, identify technical, administrative and political obstacles, and commit resources to address them or, where unrealistic, pivot to backup mitigation measures.</p>			

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- 1.8. Develop a qualitative study (“Change Stories”) on each of the mitigation measures to determine how effective they have been at boosting the impact of the conservation policies that corruption has historically undermined.
- 1.9. Conduct a re-run of the 2024 survey of partner entities in early 2026 and early 2028 to determine progress in improving scores in the Green Corruption Risk Mitigation Confidence Index (GCRMCI).

- 2.1. Draft Terms of Reference for Best Practices and Sample Mitigation Measure Database
- 2.2. Work with Global Steering Committee to fine-tune design of the database.
- 2.3. Implement the technical design of the database.
- 2.4. Collect experiences, best practices, and templates for inclusion in the database from our partner agencies and network.
- 2.5. Prepare the test version of the database and collect partner and external feedback
- 2.6. Improve the design and finalize.
- 2.7. Develop a communications plan to promote the existence and use of the database
- 2.8. Implement communications and promotions plan.
- 2.9. Design sustainability plan for database, including hosting, continued financing and management.

- 3.1. Design Terms of Reference for Corruption Prevention Working Group under Countering Environmental Corruption Practitioner’s Forum.
- 3.2. Draw up a list of potential members for the Working Group beyond current membership. Also invite relevant DEFRA grantees.
- 3.3. Finalize TOR and conduct regular (every other month) meetings of working group.
- 3.4. As part of Working groups, design feedback mechanisms on proposed mitigation measures for peer review by partners.
- 3.5. Encourage partners to present their innovations and challenges in the working group to foster the sharing of good practices.
- 3.6. Track innovations and experience in the database as part of Output 2.
- 3.7. Where relevant, facilitate direct partner collaboration between relevant technical expertise matches in partner countries.
- 3.8. Conduct evaluation of the utility of the Working Group on a regular basis (after every meeting) to ensure it remains partner-relevant.

Governance

- Setting up of the Steering Committee with decision-maker level official participation
- Conduct semi-annual Steering Committee meetings, aligned with reporting cycles
- Circulate meeting notes
- Adjust programming based on Steering Committee feedback

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Reporting

Semi-Annual Report Preparation

Annual Report Preparation

Final report drafting

M&E Review