Project Completion Review - Top Sheet

This Top Sheet captures the headlines on the programmes performance over the course of its lifetime. Teams should attach summary sheets from each annual review over the life of the programme.

Review Date:	**23rd August 2016**

Title: Competition Reform for Enhanced Welfare (CREW)		
Programme Code: 203299	**Start Date: 19/3/13**	**End Date: 31/5/16**
If programme was closed >1 month early please describe in a few words why.		

Summary of Programme Performance

Year	**2014**	**2015**					
Programme Score	**A**	**B**					
Risk Rating	**Moderate**	**Severe**					

Financial Position

Original Programme Value	£915,000
Extensions/ amendments	2 no-cost extensions
Log-frame revisions (with dates) Dates of revisions:	25/6/13 26/2/14 9/6/15 19/7/16 (to adjust final dates)
Total expected programme spend	£902,921.45

Follow up actions required following closure

Annual audited accounts to be checked when released in October'16 and October '17.

A. Introduction and Context (1 page)

DevTracker Link to Business Case:	http://iati.dfid.gov.uk/iati_documents/3956593.odt
DevTracker Link to Log frame:	http://iati.dfid.gov.uk/iati_documents/5014656.xlsx

Outline of programme and what it has achieved
Competition issues are as important in developing countries as in developed ones. A 2002 study[1] found that an additional telecoms operator entering the market increased mobile subscriptions by 57 percent in more than 40 African countries. But whilst many developing countries have competition legislation, and even competition bodies, strong vested interests and limited awareness of the costs of weak competition and regulation mean that rules are rarely enforced. CREW has attempted to address this problem by improving the politics of competition policy – devising a methodology for assessing the impact of competition issues and using the results in advocacy work that highlighted the costs of inaction and stimulated discussion of options for reform. CREW piloted the experimental approach in 4 countries, with the objective of producing a methodology that could be replicated by other developing countries. The definition of 'competition' used was deliberately broad, including other government policies and regulations that affected how firms competed with each other, not just laws around monopolies and cartels. In each pilot country the programme studied 2 sectors - staple food and bus transport. These were ambitious sectors to choose, both typically being heavily regulated and sometimes facing state involvement. But they are 2 sectors where poor people spend a large amount of their income, so they are important for outcomes for the poor.

The programme has produced Diagnostic Country Reports (DCRs) assessing the impact of competition issues in the 2 sectors for each of the 4 countries, a substantial synthesis of the 4 DCRs, and a number of products supporting a Framework for Competition Reforms (FCR) – a guidebook for reformers in other countries to help them replicate the methodology. The process for producing these documents was intended to be as important as the products themselves. The work was led by the Indian NGO CUTS and carried out by local partner organisations in each country. It was guided by National Reference Groups made up of key stakeholders, including government and the private sector; and culminated in an advocacy phase aiming to generate a public debate, including in the media. As set out in Section B, the programme did find it difficult to produce the DCRs to the standard originally envisaged, and there are questions of sustainability once the programme ends, but CREW has raised awareness of the issues amongst the stakeholders and brought them together in public debate over these difficult questions, and developed the methodology set out in the FCR to help other countries address these issues.

CREW was in line with the then-current 2011-16 Operational Plan for the Growth and Resilience Department; clearly contributing to the objective of improving investment climates in developing countries, and also contributing to addressing inequality given the focus on sectors where the poor spend their money. More recently, it is also clearly in line with our new GRD Business Plan with its focus on Strategic Objective 3 of the new UK Aid Strategy - contributing to promoting global prosperity. The programme is also in line with our cross-cutting objective of focusing on the political economy of reform.

[1] Gebreab, Frew Amare (2002), "Getting Connected: Competition and Diffusion in African Mobile Telecommunications Markets", Policy Research Working Paper 2863, June

B: PERFORMANCE AND CONCLUSIONS (1-2 pages)

Overall Outcome Assessment

The expected outcome for CREW was 'Competition reforms or enforcement actions are directly and positively influenced by the better knowledge and tools for competition reform impact produced by the programme'. The outcome indicators were that (1) In at least 5 out of the 8 pilot sectors, a government official or minister acknowledges the need for competition-related reform in line with the CREW findings, and publicly commits to making such a reform, (2) CSOs or competition authorities in 3 additional countries/states show interest in replicating the evidence-based advocacy methodology, and (3) A study based on the CREW methodology (or some evidence-based advocacy work inspired by CREW) is initiated in at least 1 other market.

Indicator 1 has mostly been met. Government officials or ministers have made public statements in all 4 countries expressing a strong interest in and agreement with CREW's findings. In some cases there is an implication government will seek to implement the recommendations, though inevitably such statements are somewhat vague. It is notable that that government officials in Zambia, Ghana, and the Philippines wrote letters expressing their thanks to CREW for its work and expressing interest in its findings. Indicator 2 has clearly been met – Governments Agencies in Malawi, Botswana, Namibia and Mauritius and NGOs in Pakistan and Kenya have expressed an interest in replicating the methodology (6 countries versus a target of 3). And Indicator 3 has also been met - the competition agencies in Malawi, Botswana and Namibia have begun drawing up ToRs (and in Nambia's case wrote a letter committing funding) – 3 examples versus a target of 1.

More broadly, it is difficult to tell at this point whether CREW will lead to actual reforms in the 4 pilot countries or be replicated elsewhere. This is partly because of timing - the programme fell behind schedule and in any case building a coalition for reform and then seeing implementation of that reform through takes time. Also, attribution of reforms to a programme like CREW will always be difficult. Realistically, a programme such as CREW cannot push a government to implement reforms it has no interest in. It will need to operate by identifying reforms which are desirable and politically achievable, making the case for reforms that are in that sweetspot, and helping build a coalition of support. It can therefore take reforms that might have happened anyway and make them happen faster, better, or more sustainably; but it can't drive reform single handed. There is some evidence that CREW may be doing this, but it is difficult to tell. And it has been held back by problems that the project encountered in delivering the DCRs to schedule and to the standard envisioned, and questions over the breadth of engagement and ownership of reform proposals. A key objective of the programme was that it develop a methodology that could and would be replicated in other countries. The methodology has been produced, and as noted above there are signs that the authorities in some of the pilot countries are considering a similar process in other sectors, and that other countries are considering using the approach. It is hard to tell at this point whether reforms will be sustained or interest from other organisations and countries will be converted into actual initiatives, but this was not expected to be clear by the end of the project given the time lags involved.

Output Score and Description

The CREW project set itself an ambitious task, selecting 2 sectors in which the poor spend a lot of their money (staple foods and bus transport), but which are complicated, and subject to heavy regulation and intervention by government (especially staple foods). The initial research in each country was carried out by local research organisations given their understanding of the politics and ability to generate local buy-in for the project, but technically difficult quantitative analyses of the impact of anti-competitive practices were planned. In practice this level of technical work proved difficult to manage and deliver (with the exception of the Philippines), but by the time this became apparent the project was 11 months behind schedule, and the initial research studies (DCRs) were not of the robustness originally envisaged. This had knock-on effects for the rest of the project – the advocacy stage in which the research results were used to build a coalition for reform was somewhat hampered by a compressed timetable (despite 2 no-cost extensions), and a less solid analytical base. The programme has delivered useful outputs – the synthesis study of the DCRs is a helpful summary of findings and the Framework for Competition Reforms (FCR) – a guide for reformers in other countries to replicate the process - is a useful and practical tool. It may even have benefited from not relying on technically difficult quantitative analysis as this makes it easier to replicate. The independent review of CREW found that respondents thought the

FCR a useful document, and that the advocacy work had brought together stakeholders to discuss difficult issues when this would not have happened without the programme. It did also find that awareness of CREW's findings amongst stakeholders was limited, suggesting that ownership may not have been very broad, but subsequent public statements from public officials suggest that this has probably improved. There are questions about the sustainability of the momentum generated now that the programme is ended, though the lead implementers CUTS are planning to continue working on at least some of these topics, and CREW has produced various plans and proposals for the authorities suggesting ways to implement specific reforms in addition to the core project outputs. The project made limited progress on including gender, though this was at least partly because donors only introduced a gender focus part way through the programme.

Given the above, Output 1, which covered the initial research part of the project was scored as a B – 'Outputs moderately did not meet expectation'. Output 2, which included the outreach and advocacy element of the programme was more successful, but was also scored as a 'B', albeit at the top end. Therefore, <u>the output score for the programme as a whole is a B</u>.

Lessons and how these have been shared
Lessons have been learned in 2 areas – the technicalities of doing competition policy advocacy, and programme management for a programme such as this.

<u>Competition policy advocacy</u>

- Rigorous analysis of the impact of anti-competitive practices is technically demanding, it is important to be realistic from the beginning about what is viable.
- A broad view of competition must be taken to understand the key issues facing sectors. Many of the factors limiting competition and market access in the staple food sectors were caused by government intervention – subisdies, price controls, interventions in marketing systems etc. Many countries intervene in these markets and there can be good reasons for doing so given equity and market failure concerns. But such interventions can also limit competition.
- In the bus transport sector the project did not find much evidence of collusion or price setting. In fact markets were so competitive that margins had been compressed to the point where vehicles were often poorly maintained, over-crowded, and unsafe. The problem was actually one of regulation – setting minimum standards to benefit consumers without generating excessive barriers to entry, and agreeing optimal processes for setting routes.
- The process developed in CREW does require funding to carry out the research and outreach. Whilst some MICs such as Namibia may be able to commit the necessary funds themselves (as they have stated they intend to do), LICs may find it hard to implement without external funding.

<u>Programme management</u>

- The DFID lead for CREW changed a number of times during the programme, contributing to delays as the new lead got up to speed and inevitably had different views on how to proceed.
- Adding gender objectives part way through a programme once objectives had been agreed with multiple partners had limited impact, it would have been better to have properly integrated it from the start.
- To provide CUTS with working capital they were provided with an up-front payment of a 'float', with subsequent payments made in arrears. This complicated project finances when exchange rates moved, and it would probably have been better to have simply paid funds in advance, as is commonly the case with accountable grants to developing country NGOs.
- Pressure on costs and multiple layers used to manage the country programmes meant that the contractors carrying out the initial research received low levels of fees, limiting the work they could/would do, and contributing to delays and problems with the standards of the DCRs.
- Managing programmes of this type requires a heavy investment of DFID staff time, which needs to be factored in to design and BC decisions processes.
- The programme was placed on Improvement Measures when it became apparent that it was heading for its first B in an Annual Review, without waiting for the 2 Bs or a C set out in the Smart Rules. This triggered some frank discussions to agree what the challenges facing the programme were and what should be done whilst there was still time to address them.

These lessons are set out in more detail in the independent review of the programme which will be published on the PEAKS website, and in this PCR, which will be published on DFID’s Dev Tracker external website. The project’s findings about competition policy in these sectors were also disseminated at National Orientation Workshops in each of the 4 pilot countries, and a well-attended end-of-project conference in Nairobi.

C: DETAILED OUTPUT SCORING (1 page per output)

Output Title	*Replicable tools developed to measure and highlight the impact of competition*		
Output number per LF	1	**Output Score**	**B**
Risk:	Major	Impact weighting (%):	60%
Risk revised since last AR?	Y – was Medium under old system	Impact weighting % revised since last AR?	N

Indicator(s)	**Milestones**	**Progress**
2 studies carried out in each of 4 pilot countries highlighting impact of competition reforms, or lack of competition.	Final Synthesis study (May '15) 4x Final Country Notes (Apr '15) All to be of high quality and incorporating comments from PAC. Final reports and synthesis study highlight gender aspects of competition issues.	Synthesis study drafted by June'15 and launched in July'15. Country DCRs produced by January'15, but mostly not to the level of rigour originally envisaged. There is a 10 page section on gender in the synthesis study focusing on 2 case studies, little mention in the DRCs themselves. <u>Largely not met.</u>
Guidance produced on replicable methodology for use in other markets or countries for measuring impact of competition.	Guidance note produced (including on gender-specific issues), and methodology is replicable in other markets and countries. Outputs: Finalised FCR Practitioner Guidebook (May '15) FCR Guidance Note (Mar '15)	Guidance Note developed in Feb '15, Practitioner Guidebook launched in Oct'15. Guidance note replicable in other countries, though high level. No mention of gender. <u>Mostly met.</u>
Studies stimulate interest and discussion in pilot countries, as measured by references to findings in local media and other 'multipliers'.	15 references to research in local press (cumulative, print or electronic) in each pilot country	64 references in the 4 countries (17 in Ghana, 11 in Zambia, 14 in India, and 22 in the Philippines). <u>Mostly met.</u>

Key Points

The DCRs and synthesis study were produced broadly on deadline for the revised timetable - the synthesis study was a couple of months late, the DCRs were finalised a few months ahead of the revised schedule – but this was almost a year after the original deadline. The synthesis study included a 10 page section on gender, mostly based on 2 case studies (bus safety for women in India, and maize market queens in Ghana), but the country DCRs made almost no mention of gender beyond some discussion of market queens in the Ghana study. Overall, the levels of ambition for the academic rigour of the DCRs was substantially scaled down over the course of the project. The project struggled to deliver the quantitative econometric analysis envisioned during inception (except in the Philippines), partly because of the lack of data, and the final reports were largely qualitative and descriptive, with some user surveys. The FCR Guidance Note was produced a month early, but the Practioner Guidebook was 5 months late. The Guidance Note was fairly high level (8 pages long), but the Guidebook is more substantial (100 pages), and whilst it is limited by being based on the mostly qualitative DCRs, it contains useful guidance and has received positive comments from stakeholders, including that it was easier for developing countries to use than some existing guidance e.g. from the OECD. In aggregate the project has achieved the targeted number of media references, though it was below target in two countries. Whilst the FCR Guidebook has been well received, the delays in producing the DCRs and their largely qualitative nature (with the exception of the Philippines) <u>lead us to give this Output a score of 'B' – Outputs moderately did not meet expectations.</u>

Summary of responses to issues raised in previous annual reviews (where relevant)

The programme was placed on Improvement Measures, as recommended.

Recommendations for future programmes

In retrospect the original plans for technical quantitative analysis were too ambitious given the deliberate decision to build capacity and engagement through using country partners and the complicated sectors chosen. Less technical proposals would have been more achievable and not caused such long delays, as would easier sectors. Highly technical methods would also have been less replicable in other developing countries. There is clearly a trade-off here however between practicality and rigour (for technical methods) and impact (for easier, less important sectors).

Output Title	*Evidence-based communications tools developed to help effective outreach and advocacy for benefits of competition reforms*		
Output number per LF	2	**Output Score**	**B**
Risk:	Major	Impact weighting (%):	40%
Risk revised since last AR?	Y – was Medium under old system	Impact weighting % revised since last AR?	N

Indicator(s)	**Milestones**	**Progress**
National Advocacy Plans successfully communicate need for competition reform and benefits thereof.	Outcome and output expectations as set out in the National Advocacy Plans achieved, as appropriate.	Progress made on engagement with governments and other stakeholders, and good media coverage. Discussion stimulated, though only some signs of attriubutable reform at this point. <u>Partly met.</u>
National dialogue held on NAPs and potential benefits of reform.	Discussions of findings held with stakeholders (including impact on women), Parliamentarians, and at business/government fora in all 4 countries by end Nov-2015. 1 improvement made to each reform proposal on the basis of stakeholder comments, to be achieved by Jul-15	National Orientation Workshops were held in all countries by Oct'15 to discuss the NAPs. Broad attendance with government officials and some private sector, though little evidence of Parliamentarians. <u>Mostly met.</u>
Guidance produced on replicable approach to inform reform efforst in other sectors and countries/states.	2x Sectoral FCRs (February '16) submitted to high quality with input from PAC. Replicable guidance note on preparing FCRs and advocating for competition reforms (including gender specific issues) produced by Nov'15. 9 references to competition policy recommendations in local press (print or electronic) in each country.	The 2 sectoral FCRs were completed by February '16 of reasonable standard. The Guidance note for preparing FCRs was produced by Oct'15. 19 references to recommendations in total (4 in Ghana, 2 in Zambia, 3 in India, 10 in the Philippines). <u>Partly met.</u>

Key Points

Country Impact Reports have been prepared for the National Action Plans in the 4 countries. These show a good level of discussion and raised awareness by stakeholders, and reasonable levels of government involvement (e.g. publishing stories on the GoGhana website). NAP outputs and outcomes were somewhat high level, so assessing if they were achieved is difficult, though it is important to be opportunistic and adaptive in such circumstances. The independent review found limited evidence of awareness and engagement amongst stakeholders, though the advocacy work has carried on since then and there is evidence of increasing engagement. There is limited evidence of having driven reform or policy change at this point, though there are indications of some (e.g. maize floor prices in Zambia, bus regulations in India, and quantitative restrictions on rice imports in the Philippines). Attribution is difficult given that these are reforms that others were also calling for, but that is inevitable in advocacy work, and in any case it was expected to take longer than the life of the programme for actual reforms to be delivered. National Orientation Workshops were held in all 4 countries to disseminate the NAP findings and generate public debate by October'15. Where evidence is available attendance has been good, though inevitably not all target groups attended all sessions. The Sectoral FCRs were produced by February '16, and have been published, after feedback at the Nairobi end-of-project conference. They are of a reasonable standard, clearly setting out a practical process that could be followed to replicate CREW, though details on the technical quantitative processes were somewhat high level. The independent review found that whilst only some stakeholders were aware of the FCR, those that were commented positively that they were practical and easy to use.

The target on references to policy recommendations was missed by some margin (19 in total, against an aggregate target of 36). More generally, there was considerable media coverage of the advocacy phase, and of engagement with stakeholders from October onwards, though the independent review found low levels of awareness amongst stakeholders in interviews in January'16. The FCR documentation has been of a reasonable standard, and been well received, though as noted above there has been limited evidence of actual reform to date.

The advocacy work and tools to help others replicate CREWs approach have been the strongest part of the programme, and public debates have been convened that would not otherwise have happened, but the uncertainty over whether attributable policy change will be delivered given the compressed timetable and the questions over sustainability and broader buy-in mean that we have also scored this output as a 'B' – 'Outputs moderately did not meet expectation', albeit at the top end.

Summary of responses to issues raised in previous annual reviews (where relevant)
There is a strong political economy focus in the FCR guidance, including a 4 page annex on approaches, but no mention of gender.

Recommendations for future programmes
A key issue here has been timing. The delays in the early stages of the programme meant that the final stages were somewhat compressed. This made it more difficult to generate the momentum necessary to deliver such complex and contentious reforms in the time available, and in particular meant it wasn't practical for actual reforms or policy changes to have been implemented by the end of the programme. The independent review also made some useful recommendations around contingency planning for interlocutors changing in election years, ensuring that all relevant government bodies were involved, and engaging early with relevant industry bodies to ensure their viewpoints were understood, even if they are unlikely to be supportive of reforms that may not benefit their interests.

D: VALUE FOR MONEY & FINANCIAL PERFORMANCE (1 page)

Key cost drivers and performance

The key cost driver in the programme was staff time for CUTS in managing and implementing the programme. Costs were increased part way through the programme when it became necessary to contract Nathan Associates to provide technical advice on carrying out the DCR research papers. Also, £30,000 was removed from the original £915,000 budget to pay for an independent review of the programme. However, the project was funded in sterling (and euros, having received a EURO 300,000 contribution from Germany’s BMZ through their technical agency GIZ) but many of the costs were in rupees. Exchange rates moved in the project’s favour, and the programme received more rupees than originally expected, enabling a 7% increase in the rupee programme budget part way through. Spending on international travel was also greater than originally envisaged and was increased, whilst the budget for a planned conference were correspondingly reduced.

VfM performance compared to the original VfM proposition in the business case

The VfM proposition in the BC focused on economy measures, such as international travel costs (5.7% of the total cost), and core HQ staff costs (23% of total costs). HQ staff costs were high, but in line with the original budget in the Business Case, and not surprising for a project of this kind requiring considerable international coordination, management, and monitoring. And working with a developing country NGO and local country partners kept costs down. The cost of the Project Coordinator was only £1,120 per month [2], much cheaper than if an international consultancy had been commissioned to do the work. Indeed, as noted in earlier sections, too much economy may have been achieved when contracting the consultants who delivered the research for the DCRs – their funding for delivering the DCRs was probably not sufficient. It should also be noted that the project benefited that the presence CUTS already has in Ghana, India and Zambia, and its existing contacts and profile in the competition sector.

Assessment of whether the programme represented value for money

This is very difficult to assess since the benefits of the programme are really hard to quantify - the CBA in the original BC was qualitative for this reason. The potential gains from reducing anti-competitive behaviour in our partner countries are huge, and CREW has produced a methodology that can be used in other countries to raise issues in a more evidence-based manner and produce locally-owned reform proposals. Indeed there are signs that it may be used in other countries in the future (and other sectors in the pilot countries), and it has succeeded in generating debate in the pilots sectors and countries. There are limitations to the technical robustness of the analysis in most of the pilot countries, but the counterfactual is probably that debate would have been less evidence-based, not based on more rigorous evidence, and the process and evidence was locally owned. Therefore, given the economy, relatively modest costs, and large potential benefits it seems reasonable to assess that CREW does represent VfM, but it is difficult to be more precise than this.

Quality of financial management during programme

The budget was broadly adhered to through the programme, apart from an increase in the international travel budget and some other relatively small changes, and the increase in the rupee value of the budget by 7% because of favourable movements in exchange rates. Financial information has been provided when requests for payment were submitted, typically quarterly. Audited annual accounts for CUTS were provided and they were unqualified, though they typically had to be requested. Whilst documents were submitted on time their structure was somewhat difficult to understand, particularly since (with the exception of the requests for funds) they were in rupees. This combined with the significant exchange rate movements over the programme complicated assessments of the financial position of the programme. The next audited annual accounts for CUTS will be produced in October 2016 to cover the period April ’15 to March ’16, which CUTS will provide, along with the 16-17 audit accounts in October 2017, since these will cover the last 2 months of the programme.

Date of last narrative financial report	Received 15/7/16 for the period April-May 2016
Date of last audited annual statement	April ’14 – March ’15, received November 2015

[2] Using exchange rates on 4/8/16 from www.oanda.com

E: RISK (½ page)

Quality of risk management over the life of the programme
Programme risks were managed closely over the period. Once it became apparent early on that the programme was falling behind schedule and struggling to produce quality DCRs then DFID supervision of the programme was increased, and in early 2015 the programme was put on Improvement Measures, with quarterly indicators to be met before payments were disbursed for the rest of the programme. This did appear to have an effect in encouraging adherence to timelines, improving communications, and clarifying expectations on both sides. After this the programme broadly stuck to its revised timeframe, though issues over the rigour of the DCRs could not by that point be corrected. The programme was put on Improvement Measures well before DFID rules say that this is required. Smart Rules say that a programme should be put on Improvement Measures once it receives 2 Bs in a row (or one C) in Annual Reviews, but here they were begun when it became apparent that the programme was heading for its first B to get agreement on what the problems facing the project were, and what should be done whilst there was still time to address the issues involved.

The key challenges that faced the programme were identified as risks in the original Business Case, including the production of high quality DCRs, getting ownership from government and other stakeholders, data, sustainability, timelines, and currency fluctuations (though the programme benefited from this).

A range of lessons have been learned from this, as set out in Section B.

F: COMMERCIAL CONSIDERATIONS (½ page)

Delivery against planned timeframe
As set out in other sections, CREW rapidly fell 11 months behind schedule in the early period of the project as it struggled to produce the DCR research reports. The programme was ultimately given 2 no-cost extensions totalling 7 months to enable it to carry out the second phase of the programme. This could be done within the original budget - partly because the intial 5 month extension was done early in the programme, and partly because the rupee budget increased by 7% because of exchange rate fluctuations, but it did cause problems by compressing the second phase.

Performance of partnership (s)
The partnership with the lead implementing partner CUTS worked reasonably well through the project. Whilst the programme did face challenges these were discussed frankly to enable identification and resolution, and CUTS clearly strongly owned the programme and were very dedicated to its effective delivery. The other funder GIZ stayed closely involved in the programme, attending the monthly calls and the annual conferences, despite all their funds being disbursed in a single payment at the very beginning of the programme.

Asset disposal and value obtained by DFID
There were no assets purchased by the programme.

G: CONDITIONALITY (½ page)

Partnership principles assessment

N/A

H: MONITORING & EVALUATION (½ page)

Evidence and evaluation
No evaluation was planned for this programme, though an independent review was commissioned through the PEAKS framework near the end of the programme.

The evidence base underpinning the programme hasn't really changed, though it has expanded to further underscore the importance of competition for partner countries. A new WB/Africa Competition Forum report 'Breaking Down Barriers: Unlocking Africa's Potential through Vigorous Competition Policy' has highlighted the costs of anti-competitive markets in Africa. For example, it found that one supplier holds more than half the cement market in 18 African countries, and that cement prices in Africa are, on average, 183% higher than world prices. More competitive markets could save African consumers from overpaying for cement by $2.5 billion per each year.

This programme adds to the evidence base on implementing competition policy. Most of the current evidence base is technical studies on the costs of anti-competitive behaviour, and the DCRs have presented evidence on this in an accessible way. But its biggest contribution has been its focus on outreach and improving the politics around reform and addressing competition issues, and in setting out how this can be done in practical guidance that can be followed in other developing countries.

Monitoring progress throughout the programme
This PCR is based on an independent end-of-project review carried out by a consultant, data provided by CUTS, and ongoing conversations with CUTS and the GIZ. The independent review included extensive interviews with the implementing partners in the pilot countries, and government and industry sector representatives. The consultant visited Zambia to carry out the interviews there in person (thus receiving direct in-person feedback from stakeholders), and spoke to some others when attending the end of programme conference in Nairobi. The rest of the interviews were conducted by phone. CREW was monitored through monthly calls with CUTS and GIZ, with payments being conditional on progress against quarterly OVIs for the final year. DFID advisors attended 3 CREW annual meetings (attended by CUTS, the advisory panel, and the implementing partners), and also visited the CUTS office and implementing partner in Zambia when in the country on other business. CUTS's internal M&E team also prepared a Mid-Term Review of the CREW programme that was thorough and objective with recommendations that agreed with those we made in our 2015 Annual Review of the programme.

Smart Guide

The Programme Completion Review is the opportunity to reflect on the entire programme, its performance, achievements, lessons and how learning will be shared to inform future programming.

The Programme Completion Report assesses and rates outputs using the following rating scale. The Aid Management Platform (AMP) and the separate programme scoring calculation sheet will calculate the overall output score taking account of the weightings and individual outputs scores

Description	Scale
Outputs substantially exceeded expectation	A++
Outputs moderately exceeded expectation	A+
Outputs met expectation	A
Outputs moderately did not meet expectation	B
Outputs substantially did not meet expectation	C

Teams should refer to the considerations below as a guide to completing the annual review template.

Summary Sheet

Complete the summary sheet with headline information on the programme and any follow up actions

Early closure is likely to be summed up by issues such as 'poor performance by partners' and/or 'major changes in operating environment'

A: Introduction and Context

Briefly outline the programme, results achieved and contribution to the overall Operational Plan and DFID's international development objectives. Where the context supporting the intervention has changed from that outlined in the original programme documents explain what this will mean for UK support

B: Performance and conclusions

Outcome Assessment

Brief assessment of whether the programme achieved the Outcome

Overall Output Score and Description

Progress against the milestones and results achieved that were expected as at the time of this review.

Lessons

Any key lessons you and your partners have learned from this programme

Have assumptions changed since design? Would you do differently if re-designing this programme?

How will you and your partners share the lessons learned more widely in your team, across DFID and externally

C: Detailed Output Scoring

Output

Set out the Output, Output Score

Output Score

Enter a rating using the rating scale A++ to C.

Impact Weighting (%)

Enter the %age number which cannot be less than 10%.

The figure here should match the Impact Weight currently shown on the logframe (and which will need to be entered on AMPas part of loading the Annual Review for approval).

Revised since last Annual Review (Y/N).

Risk Rating

Risk Rating: Minor/Moderate/Major/Severe

Enter: Minor, Moderate, Major or Severe

The Risk Rating here should match the Risk currently shown on the logframe (and which will need to be entered on AMP as part of loading the Annual Review for approval).

Where the Risk for this Output has been revised since the last review (or since inception, if this is the first review) or if the review identifies that it needs revision explain why, referring to section E Risk

Key points

Summary of response to issues raised in previous annual reviews (where relevant)

Recommendations for future programmes

Repeat above for each Output.

D: Value for Money and Financial Performance

Key cost drivers and performance
Consider the specific costs and cost drivers identified in the Business Case
Have there been changes from those identified in previous reviews or at programme approval. If so, why?

VfM performance compared to the original VfM proposition in the business case. Performance against vfm measures and any trigger points that were identified to track through the programme
If programme was closed >1 month early please describe in a few words why, what savings were made, as well as what money was spent.

Assessment of whether the programme represented value for money?
Overall view on whether the programme was good value for money

Quality of Financial Management during programme
Consider our best estimate of future costs against the current approved budget and forecasting profile
Have narrative and financial reporting requirements been adhered to. Include details of last report
Have auditing requirements been met. Include details of last report

E: Risk

Quality of risk management over the life of the programme.

How were risks managed, the degree to which they were realised and/or mitigated?

Did any risks materialised throught the duration of the programme which were not forseen? What where they and how was this managed?

What lessons have been learned?

F: Commercial Considerations

Delivery against planned timeframe. Y/N

Compare actual progress against the approved timescales in the Business Case. If timescales are off track provide an explanation including what this means for the cost of the programme and any remedial action.

Performance of partnership
How well are formal partnerships/ contracts working
Are we learning and applying lessons from partner experience
Could DFID be a more effective partner

Asset disposal and value obtained by DFID

How were assets managed throughout the programme? How have they been (or will they be) disposed to get maximum value?

G: Conditionality

Partnership principles assessment

For programmes where we have decided to use the PPs for management and monitoring, PCRs should generally include an assessment of commitment to the PPs, including any concerns that have occurred over the year, the partner government's response, and details of any response by us. Teams should refer to the DFID guidance on reviewing projects.

H: Monitoring and Evaluation

Evidence and evaluation
Changes in evidence and implications for the programme
Where an evaluation is planned what progress has been made
How is the Theory of Change and the assumptions used in the programme design working out in practice in this programme? Are modifications to the programme design required?
Is there any new evidence available which challenges the programme design or rationale? How does the evidence from the implementation of this programme contribute to the wider evidence base? How is evidence disaggregated by sex and age, and by other variables?

Where an evaluation is planned set out what progress has been made.

Monitoring process throughout the programme
Direct feedback you have had from stakeholders, including beneficiaries
Monitoring activities throughout review period (field visits, reviews, engagement etc)
The Annual Review and PCR process