ANNUAL REPORT
ENDING

65-C NATIONAL HIGHWAY
PHASE II DEFENCE HOUSING AUTHORITY
KARACHI
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## THE ORGANIZATION

**Name**  
Transparency International – Pakistan

**Address:**  
65-C National Highway,  
Defense Housing Authority, Phase II  
Karachi - Pakistan

**Telephone:**  
0092-21-4552438 and 5803518

**Facsimile:**  
0092-21-4559152

**e-mail**  
ti-pak@khi.paknet.com.pk  
omari@transparency.org.pk

**Web site:**  
www.transparency.org.pk

**Status:**  
Registered as a TRUST. – Transparency International – Pakistan.

**Function:**  
A Non-Profit, Non-Political, Non-Partisan, Non-Investigative and Non-Confrontational Civil Society Organization established to combat corruption through systemic reforms.
The following Code of Ethics were decided upon by TI-Pakistan

**THE VISION:**
“To make Pakistan a better country to live in.”

**THE MISSION:**
To mobilize the individual, the Organization, the Society and the Nation, the young and the old, the poor and the rich and of all religions, and to bring together on one platform all those in whose hearts is a fire to improve our society and combat corruption within our country.

To seek out and form a coalition of all those individuals and organizations who prefer justice and abhor dishonesty and corruption, and those in whose hearts is a fear of God and the Day of Judgment.

Transparency International –Pakistan will try to raise public awareness of the evil influences and effects of Bribery and Corruption. It will assist the Civil Society to play a meaningful role in countering institutional corruption. It will advise Government departments and Civic Agencies on how to take effective steps to prevent and combat corruption. It will try to spell out the standards of ethical conduct expected of officials both in the Private and Public sectors. Above all we shall try **to make Pakistan a better country to live in.**

**THE CORE VALUES:**
Transparency, Accountability, Justice, Consultation, Honesty, Equal Participation, and Courage.

**THE GUIDING PRINCIPLES:**
Transparency International – Pakistan, supports the Guiding Principles laid down by Transparency International in its meeting at the 9th. International Conference on Anti-corruption held in Ottawa Canada in September 2000.

The Transparency International guidelines state: That we are a Civil Society organization committed to respecting the following principles:

1. As coalition builders we will work cooperatively with all individuals and groups, with profit and not for profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.

2. We undertake, to be open, honest and accountable in our relationship with everyone we work with and with each other.

3. We will be democrat, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified, although we ourselves do not seek to expose individual cases of corruption.

5. The position we take shall be based on sound, objective and professional analysis and high standards of research.

6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.

7. We will report accurate and timely reports of our activities to our stakeholders.

8. We will respect and encourage respect for fundamental rights and freedoms.

9. We are committed to building, working with and working through national chapters worldwide.

10. We will strive for balanced and diverse representation on our governing bodies.
ACTIVE PROGRAMS IN 2004

In June 2004, TI-Pakistan signed a contract with the Swiss Agency for development and cooperation (SDC) to carry out a comprehensive “Anti Corruption Awareness” The programs and activities of TI-Pakistan described herein do not include the programs under the SDC “Anti Corruption Awareness Program”

1. IMPLEMENTATION OF THE “INTEGRITY PACT” AND THE OPEN SYSTEM IN GULSHAN-E-IQBAL TOWN TO ESTABLISH A CLEAN AND TRANSPARENT GOVERNMENT

On August 14th, 2001, the process of Devolution was initiated by the present Government of Pakistan. The elected members of City District Governments, Town and Village Councils took over the reigns of government. The people were being given back what was rightfully theirs. In his inaugural speech, Mr.Naimatullah Khan - Nazim City Government –Karachi made a promise to the Citizens of Karachi - to provide Transparency in all the dealings of the newly formed government.

Transparency International – Pakistan in response to this commitment by the City Nazim (Mayor) made a presentation to the City Government, introducing the “Integrity Pact” and the OPEN system of Government with a view to support him and his newly elected government in their promise of establishing for the Citizens of Karachi a Clean and Transparent Government..

On December 21, 2001 with the blessings of the City Nazim, the Nazim Gulshan-e-Iqbal Town Mr. Abdul Wahab signed a Memorandum of Understanding (MOU) with Transparency International – Pakistan (given below) to go ahead with the implementation of the “Integrity Pact” and the OPEN systems in Gulshan-e-Iqbal Town, one of the major towns within the City Government of Karachi. The successful implementation of the two systems within Gulshan-e-Iqbal Town would then be replicated in the other towns within Karachi City Government.

In a Seminar organized by transparency International – Pakistan in February 2002, the representative from the National Reconstruction Bureau – Dr Gulfaraz Ahmed supported the program and confirmed in his speech that the NRB were ready to take up this program if successful in Gulshan-e-Iqbal to be replicated in other towns of Pakistan under the devolution Plan.

The Memorandum of Understanding.

- A Memorandum of Understanding was signed between Transparency International – Pakistan and the Gulshan-e-Iqbal with the approval of the 13-Union Council Members, in which both parties agreed to perform in accordance with Transparency, Accountability and good governance in the Administration, Finance and procurement Departments of the Town and councils.

It is also agreed that Gulshan-e-Iqbal Town Council will continue the Integrity Pact even after the completion of this project, and will provide any information whenever Transparency International Pakistan requires for the purpose of replication of this Project.

Highlights of the program

The Organizers: Transparency International – Pakistan
Aims of the Program: To establish the “Integrity Pact” and OPEN system within the Gulshan-e-Iqbal Town to set up a Clean and transparent Government – To develop the Town into “An Island of Integrity”

The Objectives: The implementation of the “Integrity Pact” and the OPEN System also intends to achieve practical changes, not only in the Management of the Town, but also visible changes in the improvement in the Utilities and Amenities to be provided to the citizens. The need to implement the two systems does not therefore limit itself to providing Transparency in the running of Government but offers a practical approach, where the two systems will help in developing Gulshan-e-Iqbal into a an “Island of Integrity” achieving the following 10-point objectives.

- To keep all Roads and Streets clean
- To facilitate removal of Encroachments
- To develop its Parks & Gardens
- To systematically improve its Roads & Streets
- To provide an equitable distribution of Water
- To improve its Sewerage System
- To provide adequate Street Lighting
- To help increase in collection of taxes
- To establish a citizen friendly administration and
- To reduce corruption in the administration

The program as envisaged by TI-Pakistan. In Implementing the “Integrity Pact” and the OPEN systems within the Gulshan-e-Iqbal Town we intend to not only satisfy the need for providing Transparency in Gulshan-e-Iqbal Town’s Administrative, Financial and Procurement Procedures, but also establish our GOAL providing the necessary Checks and balances to establish a Clean Government and make the Town a “Better place to live in” for its nearly 650,000 citizens.

- Both these systems are tried and tested tools to provide Transparency in Government Procedures, be it for a department, Town, City or Government.. In this particular instance with respect to the Gulshan-e-Iqbal Town.

The Integrity Pact
It is a Pact which the Gulshan-e-Iqbal Town has promised to establish and implement. It is a tool in Transparency International’s fight against corruption. The ‘Integrity Pact’ is a system which ensures that all activities and decisions of public offices are transparent

The OPEN system of Governance.
The OPEN System is an ONLINE system to enhance Transparency in the process of Administrative service to prevent unnecessary delays or unjust handling of civil affairs by public officials.

The OPEN System allows for
- Easy Access- to monitoring procedures through the internet
- Transparency- and Access to real time information on the details of handling civil applications.
- Increasing Credibility- for Access to information to all citizens thereby removing public distrust.

TI-Pakistan with the help of Gulshan-e-Iqbal Town will place on the Internet details of its Organizational Structure and all other information on its Public Officials with respect to their duties and responsibilities and their availability to the public. Their Address, Telephone and fax numbers will be placed on the Internet.
The OPEN system will also incorporate computerization of all information with regards to the facilities and utilities available with the Town. It will place on the Internet all data with regards to Roads, Street Lighting, Parks and Gardens even the number of trees. It will give information on the Schools, colleges, hospitals and clinics. It will inform the community on the Contracts to be awarded and the procedures for bidding. It will give detailed information on the project itself whether for Engineering Design, Construction or Materials.

**Transparency & Good Governance**
The successful implementation of the “Integrity pact” and the OPEN System will hope to establish a clean and transparent government by providing the necessary checks and balance for good governance.

**THE STAKEHOLDERS**
- The City District Government – Karachi
- The Gulshan-e-Iqbal Town,
- The 13 – Union Councils
- The TI-Pakistan Secretariat.

**THE BENEFICIARIES OF THE PROGRAM**
One can write a lengthy treatise as to who and why they will benefit from this program, but what is important is, who will directly and indirectly benefit from this program. They include:

- The Children
- The Women
- The Citizens
- The Community
- The Elected Members and the Town Government
- The Government of Pakistan

**Present status.**
Since December 2001, following the Signing of the Memorandum of Understanding, Transparency International – Pakistan with the complete support of the Nazim, the Naib Nazim and the Coordinating Committee has been collecting and collating data and other relevant information to be placed on the Web Site in support of Transparency through the OPEN system of Government. A Web Site for the Gulshan Town was developed by TI-Pakistan and inaugurated on October 31, 2002. The Domain name is registered as: [www.gulshantownkarachi.gov.pk](http://www.gulshantownkarachi.gov.pk)

TI-Pakistan has prepared Transparent Procedures for Procurement as part of the “Integrity Pact” in addition has established a State of the Art e-Complaint center to Redress Grievance for improving the Service delivery to the Citizens of Gulshan Town. This was inaugurated by the City District Mayor of Karachi in December in which great praise was given to TI-Pakistan for our help in establishing this E-complaint Center. This Complaint center was set up with funding from Department for International Development (DfID) UK under a 4-country program which included India, Croatia, and Nigeria. The Managers of this Program were ONE WORLD SOUTH ASIA based in Delhi – India. This program is detailed below.
2. THE INTEGRITY PACT (E-PROCUREMENT) AND THE CITY DISTRICT GOVERNMENT – KARACHI

In consequence of our success in implementing the Integrity Pact with the Karachi Water & Sewerage Board’s K-III Karachi Water Supply Scheme, we were approached by the City District Government in 2003 to implement the IP in a number of Projects.

The City Mayor (Nazim) of the City District Government – Karachi (CDGK) seeking to establish a Clean and Transparent Government including developing Transparent Procedures in its Major contracts has requested Transparency International – Pakistan to implement the “Integrity Pact” in a number of major Engineering Design and Construction Projects in Karachi. In 2003 we worked with the CDGK on preparing Contracting Procedures for two projects. These included:

- The selection of Consultants and Contractors for an Overhead Bridge in Karachi.
- The selection of Consultants and Contractors for the Improvement of a Major Road.

In consequence of our help to the CDGK, the City Mayor agreed to sign a Memorandum of Understanding with TI-Pakistan for working to prepare a Procurement Manual so as to provide Transparency in Procurement in the Works and Services Department. This MOU was signed in April 2003.

In collaboration with a special Coordination Committee established by the Mayor, we prepared a comprehensive Procurement Manual by September 2003. Unfortunately it took us a few months to get this Manual vetted by all the relevant Authorities before the Procurement manual could be implemented.

Finally in March 2004, the Procurement manual was approved by the Relevant Authorities and instructions were given by the City Mayor for its implementation in the Works and services department. This Procurement Manual include guidelines and bidding documents for Engineering Services, Construction and procurement of Materials and Equipment based on the Recommendations, Guidelines and Bidding Documents of the Pakistan Engineering Council, Planning Commission, and the National Anti corruption Steering Committee recommendations approved by the President of Pakistan and the Cabinet of Ministers.

This implementation proved quite successful, whereby the department saved Hundreds of Millions of Rupees. In consequence of this success, the City Mayor in November 2004 directed all 18-departments of the CDGK to implement this Procurement Manual. A Training Workshop was carried out by TI-Pakistan in December instructing more than 50 Officials of the CDGK on procedures for the implementation of the Manual.

I would like to mention here that in a Seminar organized by the National Accountability Bureau in June 2004, in support of the implementation of the UN Convention held in Islamabad, the City Mayor of Karachi who was asked to speak on the occasion confirmed in front of all major stakeholders of Pakistan including the Auditor General etc the adoption by the CDGK of the Procurement Manual and the success due to it.

The Procurement Manual included the Integrity Pact as part of the requirements to be signed by Vendors.

**Present Status**

The procurement manual is being implemented to a great extent in most of the departments of the CDGK. The Procurement Manual is now available on their websaite www.karachicity.gov.pk

A coalition against corruption.
3. THE “INTEGRITY PACT FOR ENSURING TRANSPARENCY” WITHIN THE LICENSING AND VEHICLE FITNESS DEPARTMENTS OF THE KARACHI CITY TRAFFIC POLICE.

In a presentation made to the Lord Mayor of Karachi in November 2001, with the possibility of putting in place an “Integrity Pact” with the CITY DISTRICT GOVERNMENT – KARACHI which was later approved for GULSHAN TOWN having a population of 650,000, the Commander Army Monitoring Cell City District Government Brig. Mohammad Ayaz invited the Deputy Inspector General Traffic Police Mr. SAUD AHMED and Col. Azam to witness a similar presentation. The DIG Traffic Police was very impressed by this presentation and the work being carried out by. The Deputy Inspector General Traffic Police then invited TI-Pakistan for discussions and the possibility of implementing Transparent Procedures within his departments. These meetings resulted in the Traffic Police requesting TI-Pakistan to look to signing an “Integrity Pact” and for TI-Pakistan to provide recommendations for “Ensuring Transparency” in the workings of its departments.

After a few meetings with the DIG Traffic Police and his senior Staff it was decided that TI-Pakistan would in its initial phase take up two of its departments. The MEMORANDUM OF UNDERSTANDING was then signed between the two parties in July of 2002. This MOU is attached along with.

This very important program has benefited the Citizens of Karachi with a population of 14 Million. The final recommendation of the two departments were submitted to the Inspector General Police in July and October 2003.

It is expected that the Project “Ensuring Transparency” within the Karachi City Traffic Police will result in benefit not only to the Citizens of Karachi, who normally have to pay “Speed Money” for obtaining Licenses but will help the Truck, Bus and Oil Tanker Transporters to get their “Fitness Certificates without also having to pay “Speed Money”

The Recommendations to the “Driving License Department” envisages the Use of “Smart Cards” in place of normal easy to forge Driving Licenses and “Test Driving Simulators” in place of present methods being followed which very easily allows for “Speed Money” being paid to the “Touts” thronging the premises of the Driving License Issuance Department.

The Recommendations in the “Vehicle Fitness: department” envisages the need to encourage Private Enterprises by setting up “Vehicle Testing Stations” thus eliminating the Direct Contact between the Police and the Owners of Vehicles.

At the same time, TI-Pakistan recommended procedures and other formats whereby the Police personnel themselves will also benefit from Fund Raising Schemes. These schemes would be basically to monetarily compensate the Traffic Police and the Police Personnel at the Driving Licensing Authority and provide them a legitimate additional income

Present Position
It must be admitted that of the two recommendations made for Ensuring Transparency, the Driving License department has implemented many of our recommendations and has improved its efficiency and transparency in issuing Driving Licenses. The second department is still the same and we are not sure if there is any progress in adopting our recommendations.

But we would like to point out that the recommendations made to the two departments can be replicated in any third world country by our national Chapters.
4. THE NATIONAL INTEGRITY SYSTEM [NIS] AND THE COUNTRY STUDIES
In July 2002, we were approached by Alan Doig and Stephanie McIvor of the Country Studies Research Coordinator (CSRC) with a proposition for the involvement of TI in a Commonwealth study funded by DFID of UK which basically involved a report which would study the possibility of Promoting Good Governance in Commonwealth countries. Following a study of the TOR and discussion within TI-Pakistan we gave them our approval of participation in this study The program, CV’s and Work Plan was finally approved by Alan Doig at the end of August and hoped to commence our Program by the 10th of September.

What is the NIS?
The NIS is a set of components (objectives), and elements (actions to be taken), to be delivered by or through key institutions, sectors or specific activities (the ‘pillars); collectively the NIS is proposed as a system which, when in existence and functioning, is concerned with combating corruption as part of the larger struggle against official abuse, malfeasance, and misappropriation in all its forms, was in turn has an overall goal to create more effective, fair, and efficient government; in short the NIS is about promoting good governance:

'...the aim is not complete rectitude or a one-time cure or remedy, but an increase in the honesty or integrity of government as a whole...'1

The concepts, components and pillars of the NIS are developed in The TI Source Book (1997) and summarized in the TI Briefing Report (The National Integrity System: The Concept - which is available on request from the CSRC). The latest version - The Source Book (2000: http://www.transparency.org/publications) - takes forward and develops the themes in the 1997 publication.2 In particular it clearly defines the pillars of the NIS:

Legislature, Executive, Judiciary, Auditor-General, Ombudsman, Watchdog agencies, Public services, Media, Civil society, Private sector, International actors

What the country study intended to deliver – Purpose.
The purpose of each Country Study was to assess the National Integrity System (NIS) and its components: for example, which components have been more successful and why, and are they mutually supportive; what factors support or inhibit their effectiveness; where should the emphasis be placed for the future; what factors are further required to support the development of a NIS; and, what activities or areas could benefit from further in-depth research or donor support. As the country studies are to form an international overview, it is essential that each be prepared in the same manner and, as far as possible, carry the same information. Thus each report should seek to provide research findings on their country’s context, on the workings of the NIS and its components, on the key issues concerning the NIS in the past and present, as well as developmental and corruption trends observed in the countries studied, the government’s anti-corruption reforms over the last ten years, and anti-corruption initiatives involving donors.

The composition of each country study
Upon completion of the research, the in-country Lead Researcher was required to submit a Country Study consisting of a narrative section in the form of a Report and a completed Questionnaire (provided in Section 7). These were both subject to the guidance within these Terms of Reference and the agreement of the Lead Consultant before being accepted for the TI website.
The contents of each country study
The Report and the Questionnaire were intended to assess the NIS and its components. Two separate themes that ran through the Country Study – a formal ‘legal’ position and what actually happens in practice. The first being answered by desk research. The second requiring desk research and field research, including a series of focus groups/interviews with those ‘in the know’ - either on or off the record - (e.g. Auditor General, Inspector General of Government, lawyers, entrepreneurs, journalists etc), and the convening of a small ‘focus group’ of knowledgeable individuals (e.g. civil society representatives such as journalists, entrepreneurs, donor representatives, lawyers etc).

THE PRESENT POSITION
Transparency International – Pakistan submitted its Draft report in July 2003, for approval and resubmitted the Final Draft on December 25, 2003. This was approved in March 2004.

International Workshop on National Integrity Systems December 17-20, 2005
TI Secretariat in collaboration TI-Pakistan organized a 3-day International Workshop on the National Integrity Systems where nearly 40 delegates from South Asia Chapters (Bangladesh, India, Nepal and Sri Lanka including Pakistan) attended. Other stakeholders who attended were Ms. Kaneez Fatima and Mr. Sohail from SDC, Mr. Saad Paracha from USAID and two representatives Mr. Umar Zafar and Brig Amjad Jawaid from NAB.

The workshop was convened and chaired by Mr. Peter Rooke Programme Director Asia Pacific – Transparency International Secretariat.

Lt. Gen Moinuddin Haider, former Governor Sindh and Minister of Interior, along with Mr. Maqbool Rahimtoola former Minister Sindh and Chairman M/s. DADEX. Both advisors to TI-Pakistan also attended.

Mr. Naimatullah Khan City Mayor also came in for a few minutes to meet the delegates who were then invited to an official farewell dinner hosted by him on December 20, 2004.

The workshop was very successful and resulted in joint declaration at the end of the Workshop followed by a Farewell dinner hosted by the City Mayor of Karachi.

5. COOPERATION WITH THE NATIONAL ACCOUNTABILITY BUREAU IN ITS NATIONAL ANTI CORRUPTION STRATEGY IN ENSURING TRANSPARENCY IN PUBLIC PROCUREMENT
In August 2001, TI-Pakistan was asked by KPMG and other International Consultants to participate in partnership on a Project funded by DFID on the request of the National Accountability Bureau on a National Anti-corruption Strategy (NACS to develop in three Phases a strategy to combat corruption.

The NACS project has been led and undertaken by the National Accountability Bureau - Government of Pakistan to develop solutions which will prove effective in Pakistan’s social, economic and political context. Advice has been provided by KPMG Consulting, contracted by the UK’s Department for International Development. The project aimed to:

- analyse the causes, nature, extent and impact of corruption from a broad perspective;
- develop a broad based, high level and integrated strategic framework for tackling corruption, focusing on prevention as well as monitoring and combating corruption, ensuring consistency with the good governance reforms;
- Create an action plan for the implementation of the strategic framework to tackle public sector corruption.
In March of 2002, TI-Pakistan was invited by NAB to participate in a Focus group. Primarily for our assessment and understanding of the present climate of Corruption and suggesting the possibility of cooperation between the National Anticorruption Strategy Team set up especially for this program and TI-Pakistan.

The Focus group was very successful, in that it brought us on a one to one basis with the entire NACS team.

In May 2002, we were invited by KPMG the consultants appointed by the Donors / NAB to look into a Draft Report of the recommendations made by the NACS. It was at this point that we made a number of recommendations with regard to Transparency in Public Procurement. To their credit the recommendations made by TI-Pakistan were adopted by them in its entirety.

In June 2002 we were invited by NAB to present a Paper on “ENSURING TRANSPARENCY IN PUBLIC PARTICIPATION AND PROCUREMENT” at a Stakeholders Workshop being organized by NAB at the Jinnah Convention Hall in Islamabad in July 2002... Our presentation was a great success. The Workshop ending with a resolution unanimously approved by all the stakeholders. The resolution recommended that the proposals put forward by TI-Pakistan for Transparency in Public Procurement should be adopted by the NAB and to be a part of the National Anticorruption Strategy.

The NACS (report) which included our recommendations on Procurement were then submitted by NAB to the President and the Cabinet> The NACS was approved in October 2002.

It must be made clear that the recommendations were only those that were approved by The stakeholders at the NACS Workshop. There are about 25 other recommendations made by TI-Pakistan on Procurement Procedures and the OECD convention which has also been made a part of the NACS Report and approved by the President and his cabinet.

Present position.
Following the approval by the President, things had come to a standstill due to General Elections for the national and Provincial Assemblies. A step taken by the Military Government to revive Democracy within the country.

In 2004, after nearly 18-months of reduced inactivity by the NAB with regards to the NACS, due mainly to political resistance by the opposition parties to sit down to its business of governing the country, the NACS was revived. It was fortunate that prior to the National Elections of 2002, the Public Procurement Regulatory Authority (PPRA) Ordinance was promulgated which was a recommendation of the NACS.

Following some form of stability we were singularly concentrating in implementing the recommendations of the NACS with regards to Transparency in Procurement. With many a ups and downs we managed to pressure the PPRA in that the PPRA announced its PPRA Rules for guidance in Procurement in June 2004. This document was a culmination of all our efforts and actually resulted in various Government agencies including the Pakistan Telecommunications Company Limited (PTCL) and the Pakistan Steel Mills the two largest Corporations in Pakistan to approach us to prepare Transparent Procedures for its procurement. The projects will be separately detailed below.
6. IMPROVING ACCESS TO INFORMATION AND THE QUALITY OF GOVERNMENT SERVICES AND E-SERVICES FOR THE POOR USING ICTS

The Department for International Development (DFID) UK announced a Request for Proposal (RFP) for the above project. Transparency International – Berlin responded with the request to include the following countries within this program. The countries included Pakistan, Croatia, Bangladesh, and Nigeria. The program was to promote greater quality and transparency in the delivery of government services/e-services to the poor.

It is a known fact that the poor and disadvantaged in developing countries suffer a double bind in relation to delivery of public services. First, they lack access to those services due to physical, financial, informational, political and other barriers. Second, they lack effective mechanisms for feeding back their complaints, views, requests in relation to those services. As a result, public services to the poor lack transparency, accountability and quality.

The proposed project focuses largely on access to information and the inadequate state of grievance, redress and feedback mechanisms on services to poor women and men; and the opportunities for ICTs to strengthen those mechanisms.

Certain applications of ICTs may be relevant to particular local circumstances. However, the common core of this project will be to combine ICTs with the report card methodology and with other participatory techniques. Recent action research has shown the effectiveness of report card techniques – simple adaptations of market survey methods that gather views from the poor about various public services. Results of such surveys are communicated to appropriate government authorities and also publicized, thus providing a powerful tool for empowerment of the poor, and for improved quality of public services for the poor. TI has been using these techniques to lobby for better public services to citizens.

This project intends to use ICTs to disseminate information to service providers and users and provide an appropriate means by which the poor can provide feedback to governments on the service provided. The project would use ICTs in a number of ways, such as: a) to solicit a broader range of views on services from civil society and other relevant intermediary organizations; b) to disseminate these views to government departments; c) to monitor government’s response to grievances; d) for broader dissemination of report card feedback; e) to enable some iteration within report carding, from simple "feedback on the feedback" up to Delphi-type techniques in order to produce richer feedback to government that more accurately reflects the views of the poor.

The direct beneficiaries will be those poor women and men who do or could make use of services/e-services in those cases selected for the action research component of the project. The ultimate overall intended beneficiaries of the project are those poor women and men who are, or require to be, recipients of public services, including e-services.

The target institutions for the project are two-fold. First, public service providers: all those institutions in the chain of delivery to the poor from central ministry to local office level. Providers will benefit from a better understanding of the views (both positive and negative) of the poor about the services/e-services that are being provided.

Second, those civil society organizations that seek to represent the needs and views of the poor. These organizations will benefit through use/demonstration/knowledge of improved feedback/grievance redress systems.

In terms of methodology, this is an action research project. It combines a direct action component to build pro-poor public service feedback systems, with a reflective/analytic component to build knowledge about such systems. In addition to its value in delivering concrete project outputs, action research has also been selected for its value to knowledge-
building, and to the mutual development of understanding between stakeholders through activity-driven knowledge-sharing.

Knowledge-sharing will be facilitated by a cascaded series of workshops involving the core TI and IDPM researchers centrally; TI National Chapters and relevant public/civil society agencies nationally; and local TI researchers and representatives of the poor and of service providers for each individual action research project.

The project will make particular use of the Report Card method. This participatory approach uses market research techniques to study the perception of users of various public services/e-services through surveys, focus groups and mini case studies (Paul 1992). Quantitative service data is also incorporated that reflects users’ first hand experiences. Results are recorded on a report card, sent to relevant authorities and publicized via press conferences, and thereby becoming a powerful agent for change.

As noted above, this standard method will be strengthened through the use of ICTs in three main capacities: increasing the scope and interaction of organizations from whom feedback can be captured; increasing the richness of data through iterative feedback processes; increasing the reach of feedback dissemination. The project will also investigate the potential for automated feedback data capture at the point of service for public e-services.

To measure achievement of purpose, the project will also include subjective/objective survey data on service change over time involving both provider and user stakeholders.

The ICT Project was approved by DfID in July 2003. The project commenced from January 2004.

The first workshop on this project was held in Zagreb – Croatia in February 2004 which was to outline and determine the program and direction that each of the four countries were to take.

In June 2004, the second workshop was held in Karachi – Pakistan. This was attended by all the countries. TI-Pakistan organized various programs including a visit to the e-complaint center then under construction by the Gulshan Town Authorities. It also arranged a trip to a Katchi Abadi i.e. a slum development.

One of the benefits of this e-complaint center which has now been established is that it can be replicated anywhere in Pakistan and / or other countries and can be a TI product to be offered to any of our national Chapters. The e-complaint center and the Gulshan Town Website are now functioning efficiently.

Present position.
The Project has reached a stage in that the e-complaint center to “ensure the Quality and transparency in the service delivery” has been established and is now on line since December 2004. We will have to wait and see its performance and the success we hope that it achieves. The Tool Kit etc is being prepared and we hope will be available in the next few months which can be then be replicated be other National Chapters and Third World Countries.

7. INSTITUTIONAL STRENGTHENING OF TI-PAKISTAN
In April 2003 Transparency International – Pakistan approached the Swiss Agency for Development and Cooperation (SDC) for core funding to strengthen its activities. Following a presentation made to them in April of 2003, a tentative but conditional agreement was given to TI-Pakistan for their support, whereby TI-Pakistan was to approach other Donor Agencies
with a similar request to participate jointly with SDC in supporting Pakistan in either with funds or in organizational support.

TI-Pakistan then approached the USAID and the European Commission for support. Presentations were made to them individually at Karachi and Islamabad respectively. Unfortunately the European Commission response was negative but the USAID approved such a support. In a final meeting in November the two donor agencies have in principle agreed to fund TI-Pakistan for a period of three years commencing from January 2004.

In June 2004, a contract was signed between TI-Pakistan and the SDC to support a Comprehensive “Anti Corruption Awareness Program. Simultaneously in October another agreement was signed between the two parties with regards to Institutional Strengthening. The USAID contract has yet to be signed though in principle they too have approved their support.

8. UN ANTI CORRUPTION DAY DECEMBER 09, 2004
In accordance with the recommendation of TI-Secretariat we organized a National Seminar to celebrate the UN Anti Corruption Day on December 09, 2004. This was successfully attended and the speakers included the Governor of Sindh, the Chief Secretary Sindh, the City Nazim City District Government Karachi, the resident representative UNDP, Private sector and Civil Society. Unfortunately Mrs. Kaethy Schnietter who was also requested to speak on the occasion could not attend due to other commitments.

At the end of this programme a resolution was drafted and signed by all the stakeholders present, which appealed to the Prime Ministewr of Pakistan to expedite the implementation and ratification of the UN Convention against corruption signed by more than 126 countries in Mexico on December 09, 2003.

It is unfortunate that both the Prime Minister and the Chairman NAB could not make it to the Seminar. It was a last minute cancellation, but the Chairman NAB was represented By Director General NAB Sindh Gen. Sikandar Pasha. LOI and the Programme are given below:
TRANSPARENCY INTERNATIONAL - PAKISTAN
Strives to make Pakistan a better country to live in

SEMINAR ON
Commemorating the 1st Anniversary on the
Signining of the UN convention Against Corruption by Pakistan - Mexico December 09, 2003.

TENTATIVE PROGRAM

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<td>Seating of Guests</td>
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<td><strong>09-55 Arrival of the Governor</strong></td>
<td>Transparency International Pakistan Mr. Shaukat Omari</td>
<td>Opening Address - Transparency Not an Impossibility</td>
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<td>10-00</td>
<td>Tilawat-e-Quran-e-Pak</td>
<td>Bureaucracy Speaks on curbing corruption.</td>
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<td>10-05</td>
<td>Mr. Shaukat Omari</td>
<td>Media support in Anti Corruption</td>
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<td>11-00</td>
<td>Transparency International Pakistan Mr. Mohammad Aslam Sanjrani</td>
<td>Private Enterprise and Consumer Protection.</td>
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<td>10-15</td>
<td>Chief Secretary Sindh Mr. Mohammad Aslam Sanjrani</td>
<td>Action Plan for Transparency &amp; Good Governance in Sindh</td>
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<td>Media - Editor Business recorder Mr. Arshad Zuberi</td>
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<td>Helpline Trust Mr. Hamid A. Maker</td>
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<td>Governor Sindh Dr. Ishrat-ul-Ibad</td>
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<td><strong>Tea Break</strong></td>
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<td>BASF - The Chemical Company Mr. Qazi Sajid Ali</td>
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<td>FPCCI - President Mr. Riaz Ahmed Tata</td>
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<td>Nazim CDGK Mr. Niamatullah Khan</td>
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**LUNCH** 13-00 TO 13-40 HOURS
### Session # 3.

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<td>Pakistan Steel Mills</td>
<td>Mr. Marshuk A. Shah</td>
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<td>Chairman National Accountability Bureau</td>
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<td>The Prime Minister.</td>
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**16-00**

**QUESTION – ANSWER SESSION**  
(Questions to be submitted prior to the speech of the Prime Minister)

**16-30**

**SIGNING OF PLEDGE / DECLARATION BY PRIME MINISTER**

**16-40**

**VOTE OF THANKS**

**TEA**

Facilitation

Coordinating Partner

Sponsor

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Transparency International Pakistan

Helpline Trust

M/s. BASF – The Chemical Company
9 (i). TRANSPARENCY IN PROCUREMENT - IN THE PTCL
TI-Pakistan has been very successful in supporting the Public Procurement Regulatory Authority (PPRA) and the National Accountability Bureau (NAB) in implementing the PPRA Rules and Transparency in Procurement in a number of organizations and institutions.

A memorandum of Understanding was signed with the Pakistan Telecommunications Company Limited in May 2004. to prepare in collaboration with the PTCL a Manual for transparency in Procurement. This was prepared and submitted in June 2004.

9(ii). TRANSPARENCY IN PROCUREMENT – PSM.
On the request of the Pakistan Steel Mills a Memorandum of Understanding (MOU) was signed with them June 2004.

The MOU with the PSM was not only for Procurement but included reforms in the Administrative and financial Departments. To date we have carried out and finalized the Manual for transparent Procurement and it has been given for publication. The manual is also available on their website. www.paksteel.com.pk

9(iii). TRANSPARENCY IN PROCUREMENT - CDGK
Transparency International Pakistan signed a MOU with the City District Government Karachi for preparing a Manual for transparency in Procurement. This MOU was specifically with the Works and services department. This MOU was signed in 2003.

The Manual was jointly prepared with the CDGK and submitted to the authorities for approval. This was finally approved in March 2004. Where instructions were given to the Works department for its implementation in September 2004.

In December 2004 a meeting was convened by the City Nazim (Mayor) of the heads of all the departments (18) within the CDGK and instructions were given that the Procurement manual was to be implemented by all departments within the CDGK.

TI-Pakistan organized a Procurement Training Workshop in December in the CDGK where more than 50 – Executive District Officers (EDO’s), District Officers (DO) and Deputy District Officers (DDO) attended.

10. THE OECD CONVENTION AGAINST BRIBERY OF FOREIGN PUBLIC OFFICIALS
On may 18, 2004, Transparency International Pakistan on the request of the BASF – the Chemical Company a Multinational operating in Pakistan signe a Memorandum of Understanding to support and stand by the OECD Convention against Bribery of Foreign Public Officials.

A Press Conference was called and the MOU was signed between the two parties. The MOU was witnessed by the Consul General of Germany Ms. Verena Graefin Von Roedern based in Karachi.

In addition to BASF signing the MOU, they have promised to support our Anti Corruption Awareness Program and of mobilizing the Business community in an effort to pledge compliance with the OECD Convention.
11. **ZERO TOLERANCE TO CORRUPTION.**
In March 2004 TI-Pakistan initiated a program with the Provincial Governor to look at the possibility of working in one ministry towards Zero Tolerance to Corruption.

Again in May 2004, we wrote to the Governor, in response to a follow up by a member of the national Assembly / Senate. Dr. Farooq sattar.

On October 18, 2004 I was invited on a one-to-one to meet with the Governor to discuss the potential for this program. In this meeting we discussed the practical Implications of Transparency and of Good Governance. In this meeting the Governor requested that we make an official presentation to the Government on:

- Transparency in Procurement.
- Zero Tolerance to corruption and what it means.

Following this meeting we were formally requested to make a presentation to the Provincial Government of the Sindh Province.. This presentation was made in December 2004. In this meeting we recommended that a Public = Private partnership should be established in the form of a Procurement Committee based in the Premises of the Governor’s House to vet all large procurement tenders within the Province before tendering.

The presentation was relatively successful in that it was decided that we go ahead with the formalities of Transparency in Procurement and that we look at one of the following Ministries for Zero Tolerance and included the Home, Education or Health Ministry.

12. **WORKSHOPS AND SEMINARS / PRESENTATIONS.**
Transparency International Representatives attended / organized the following Workshops and Seminars in 2004.

- Presentation made to resident Country Director GTZ in January at Islamabad.
- Round Table organized by NAB in April in Karachi.
- International Seminar / Workshop on the UN Convention organized by the NAB in June at Islamabad.
- International Conference / Workshop on the NACS organized by NAB in October at Lahore.
- International Workshop on Improving Service delivery through ICT's organized by TI-Pakistan in June at Karachi.
- Workshop on Human Rights and gender equality organized by SDC in August at Islamabad.
- Workshop on Good Governance organized by UNDP / in November at Karachi.
- National Seminar on the UNCAC organized by TI-Pakistan in December at Karachi.
- International Workshop on the National Integrity Systems report organized by TI-Secretariat in December at Karachi.

13. **PARTICIPATION AT AGM / ANTI CORRUPTION CONFERENCES.**
Transparency International representatives attended the 12th AMM organized by TI in October at Nairobi – Kenya.

**NOTE:** In addition to the above programs carried out independently by TI-Pakistan, we have been working on a Comprehensive Anti Corruption Awareness program under a Contract signed with the Swiss Agency for Development and Cooperation (SDC). This is detailed separately below.
CONTENTS

STATUS
Anti Corruption & Awareness
Programs with SDC

1. GOOD GOVERNANCE.
1.1 Develop Computerised programme
1.2 Develop ICT models – “Youth in Governance”
1.3 Introduce Report Card systems – A Pro-poor programmed.
1.4 Replicate Integrity Pact
1.5 Assess Management system of institutions

2. AWARENESS ABOUT EVILS OF BRIBERY AND CORRUPTION.
2.1 Produce information material (flyers, documentaries, TV spots, banners, books.
2.2 Work with school teachers and students
2.3 Establish youth clubs
2.4 Organise Workshops, Seminars, Talks and Conferences
2.4.a. National Conference.
2.4.b. Workshops.
2.4.c. Talks.
2.5 Organise walks, musical shows, exhibitions.
2.6 Organise dramas, stage shows.

3. COST OF CORRUPTION MADE VISIBLE
3.1 Carry out studies
3.2 Analyse and share with the public.
3.3 Make recommendations.

4. MANAGEMENT PROVIDED
4.1 Develop finance and administration system
4.2 Develop Monitoring System.
1.0 GOOD GOVERNANCE.

1.1 Develop Computerised programme
At the end of July 2004, TI-Pakistan along with M/s. Connect2web made a Multi-Media presentation to the Lord Mayor of the City District Government Karachi (CDGK) on the overview of a State-of-the-Art Computerized e-Complaint Centre for Transparency in the workings of the CDGK Administration and a program to redress grievances and improve the quality and transparency in the Delivery of Services to the Citizens of Karachi.

On August 04, 2004, we received a letter from the DCO Karachi that the Lord Mayor was pleased with the idea and has asked us to go ahead with the program for establishing a Computerised Complaint Centre.

Dr. Saifur Rahman was assigned on behalf of the CDGK to coordinate with us and the IT department of the CDGK led by Mr. Khawaja Shafiq EDO – IT. We consequently have had several meetings so far. The Programme has been completed by M/s. Connect2web the programme developers and has been uploaded onto their website on a Test run Basis. In December, the CDGK requested for some additions to the programme to suit the present setup in their administration. These changes have been made. The Executive District Officer (EDO-CDGK) now Mr. Mushtaq who has now taken over charge as EDO from Mr. Shafiq has proceeded for performing the Hajj and on his return we hope to have a soft opening by the department.

1.2 Develop ICT Models (Website).
We have been successful in obtaining the cooperation of Prof Dr. Ataur Rahman Chairman Higher Education Commission and the Provincial Ministry for Women’s development, this we hope will help us make a success of the programme.

This program is taken in conjunction with the “Youth in Governance Program which comprises the following:

- Establishment of Youth Clubs.
- Development of ICT website.
- Organizing Workshops in the five Major cities of Pakistan
- Organizing a National Anti Corruption Convention “Youth in Governance”

In September 2004, we had finalized a Memorandum of Understanding with the School of Leadership – Karachi to assist us in the total program “Youth in Governance” Unfortunately in the meantime we have had to dissociate ourselves from this agreement, as we found that they were too expensive and we would have greatly exceeded the budget allocated for our programme.

We have finalized the contents of the Website with Cionnect2web and how the website should function within the 60 Educational Institutions which have now come on board in the five major provincial Cities. The programme has been delayed by more than 2 -months but we hope to catch up in 2005.

1.3 Introduce Report Card systems – A Pro-poor program
There is no further progress in this project even though we have discussed this study and how and to what extent it should be carried out with the following:

- The Lord Mayor of Karachi.
- Transparency International secretariat,
- Public Affairs center – Bangalore.
- Marketing and Research Consultants who will help us prepare the questionnaire and carry out the survey.

A coalition against corruption.
1.4 Replicate Integrity Pact.
You are aware of the Memorandum of Understanding signed with the Chairman Pakistan Steel Mills (MOU attached) to establish transparency in the Administrative, Financial and Procurement Departments of the PSM.

We have had meetings with all the stakeholders involved in the PSM which included:
- The Chairman and the Board of Directors of the PSM.
- Senior Personnel of the Procurement department.
- Senior Personnel of the Administrative department.
- Senior personnel of the Finance Department.
- Senior personnel of the Human resources.
- Major Vendors to the PSM including Contractors and Suppliers.

A Press Conference was organized in July, where not only the media was called but all stakeholders and senior personnel of PSM were invited to attend. This was publicized widely in the Print and Electronic media. Since then we have had a number of meetings with the relevant departments in order to prepare a suitable Procurement manual which fulfills the requirements of the various departments of PSM.

We have now prepared a Draft Procurement Manual which we submitted to them on August 30, 2004, for their review. We have continued to have a number of meetings with various members of the PSM to finalize the contents of the Manual. The Procurement Manual has now gone for printing. This should be ready by the end of January 2005. We then hope to carry out a continuous monitoring of this project for at least 12-months to implement the Manual.

1.5 Assess Management system of institutions
In relation to this project we had contacted Dr. Ishratul Abad Khan– Governor Sindh, who has referred us back to the Lord Mayor of Karachi to look into the possibility of such a program which is in keeping with the program of the Governor to fight Corruption at all levels.

Due to further contacts with the Governor, he then requested to meet with us. This was in October 2004, to understand and look into the possibility of transparency and how it will work within the provincial government.

In November we were requested by the Governor to make two presentations i) To ensure transparency in one Ministry. The Option was either of the Home / the Health / or the Education Ministries. ii) Total Transparency in Procurement in the Province of Sindh.

In this meeting held on November 13, 2004, Senior Advisors, Ministers, Secretaries, Inspector General Police from the Province of Sindh and the City Mayor of Karachi were also present.

The Presentations were successful. Our proposal to set up a “Procurement Monitoring Cell”: in the Governor's Secretariat on the lines of the Citizens Police Liaison Committee (CPLC) was well received and we have been requested to follow up on this project with various possibilities and approaches.

The second presentation with regards to establishing Transparency in any one Ministry on a trial basis was also discussed and is presently under consideration by the Governor.
2.0 AWARENESS ABOUT EVILS OF BRIBERY AND CORRUPTION

2.1 PRODUCE INFORMATION MATERIAL (FLYERS, DOCUMENTARIES, TV SPOTS, BANNERS, BOOKS)

Printing Flyers, Brochures, Stickers, Calendars etc.
We have discussed this with a number of Media Consultants, including the Millenniums Media organizers who are preparing a basic brochure for TI-Pakistan in addition to stickers, Leaflets, Banners, Posters and other information material for distribution...

The School of leadership (SOL) prepared a brochure specifically for the “Youth in Governance programme” including some basic letter heads which incorporated the SDC – TI-Pakistan and HEC.

Community Radio Spots
Though this is not part of the Anti Corruption Awareness Programme but will definitely help our programme, we have had two meeting with Mr. Javed Jabber – former minister of Information as to how do we develop this Anti Corruption Awareness program and how do we seek the support of the radio.

We have also met Mrs. Mahtab Rashdi – Presently the Secretary of Information – Province of Sindh to help us in this matter. She said that when we come up with some concrete programmes she will extend to us all needed support.

Television Spots
Though this is also not part of the Anti Corruption Awareness programme, but we feel that the collaboration of the electronic media especially the TV will help towards success of our programme. We therefore met with Mr. Ghazi Salahuddin of the GEO Television who has said that he will help us in our Anti Corruption Awareness Program and that we should come up with some concrete proposals, which are presently under study.

2.2 WORKING WITH SCHOOL TEACHERS AND STUDENTS

Child’s View on Corruption and Bribery
In this we have prepared a comprehensive program as per our Terms of reference sent to you and for which we have contacted the following for its implementation.

- The Lord Mayor of Karachi under whom there are more than 4000 Primary and secondary schools in Karachi.
- The Executive District Officer (EDO) Education – Karachi.
- The Sindh Education Foundation.
- The BASF Chemical Company.

A presentation was made to the City Mayor Mr. Niamatullah Khan and the EDO – Education Mr. Ejaz Khan Soomro. This was well received. 400 Public Schools (two hundred each from Female and male schools) have been short listed by the Education department of the CDGK. Facilitators selected from these schools have also been informed of the program. We hope to inaugurate this program after the Eidul Azha vacations after the schools reopen ending January 2005.

2.3 ESTABLISH YOUTH CLUBS.
We have two meetings one each in Karachi and Lahore with the Coordinators from the various short listed educational institutions in both cities. We explained the total “Youth in
Governance" program to them through a PP Presentation. The presentation was followed by a Question / Answer session. These meetings were held in November 2004.

We were not surprised at the enthusiasm and cooperation extended by the coordinators. The meeting of the coordinators held in Karachi in November included the coordinator from Quetta.

The programme has been delayed but we hope to meet the coordinators from Peshawar and Islamabad in February 2005.

The Chairman Higher Education Commission has cooperated with us by sending a covering letter to all the educational institutional. The total letters sent were to 105 Institutions registered and recognized by the HEC. We have received acceptance by more than 60 institutions. We had hoped to limit the number to 50, but at this time feel that it would not be correct to discourage any particular institution.

The Provincial Ministry of Women’s development has committed themselves to this program and we have given top priority to equal participation of girls in this program. The names of the nominated coordinators and students (4 females + 4 males) from each institution has been received by us.

ICT (Website - See 1.2)

2.4 ORGANIZE WORKSHOPS, SEMINARS, TALKS AND CONFERENCES

Workshops
This program is well in hand. We have had two meetings with the Institutional coordinators from Karachi, Quetta and Lahore to set up the format of the workshops. We hope to carry out these workshops in all the five cities in March / April 2005.

The list of the educational institutions and the participants have been finalized. We are presently looking for sponsors to support this programme.

The Chief Secretary Sindh – Mr. Aslam Sanjrani has promised to help us organize the workshop in Karachi. The Institution of Business Administration (IBA) Karachi and the Center for Business Management (CBM) have also extended their logistical support and we hope to hold the workshop in the premises of the IBA. We have also been extended cooperation by many institutions in Quetta, Peshawar, Lahore and Islamabad in organizing the workshops in their respective cities.

National Anti Corruption Convention.
Unfortunately we have had to postpone the National Anti Corruption Conference “Youth in Governance” as we had to organize a National Seminar on the UN Anti corruption Day on December 09, 21004 and an International Workshop on the National Integrity Systems which included TI National Chapters from South Asia. December 17-20, 2004. We hope to have this National Youth Convention in April / May 2005.

2.5 ORGANIZE WALKS, MUSICAL SHOWS, EXHIBITIONS

This is a very comprehensive programme and we have contacted various stakeholders to support this program. The stakeholders whom we have contacted include:

- The City District Government Karachi
• Multinational Companies.
• Media Organizers.
• Leading Educational Institutions.
• NGO’s such as the Rotary, Lions Club etc.
• Indus Valley School of Art and Architecture.
• The Pak American Culture.
• Event Organizers.
• The Art of Living Society.

The programme is well in hand and it is expected that we will have the first Walk-a-Cause and Musical show within the first months of 2005.

The event organizers are preparing various proposals and budget estimates and should submit the same to us before the end of February 2005.

Films and Documentaries
We have contacted three Organizations with experience in preparing Documentaries who are preparing proposals and budgets to be submitted to us, we hope by the end of this year.

Unfortunately tentative budgets submitted by the vendors show that the funds required for this project far exceeds our own estimates.

In the meantime we have contacted Mrs. Huma Bokhari who previously worked with INDUS TV in a programme related to exposing corruption. We may be having her support in preparing this documentary at a far lesser budget.

The GEO Television has also promised to look to the possibility of supporting us in this programme.

2.6 ORGANIZE DRAMAS, STAGE AND PUPPET SHOWS

We are now associating with the following to help us arrange Dramas and Puppet shows.

• The Pak American Culture Center. (PACC) Here we are coordinating with the Cultural Director Mrs. Asma Ahmed who has promised to support the programme completely.
• The Indus valley School of Art and Architecture on this programme and
• The City District Government Karachi – Primary and secondary Education Departments.

3. COST OF CORRUPTION MADE VISIBLE.
This Programme is not in the YPO for June to December 2004.

3.1 CARRY OUT STUDIES
This is not part of the programme for June to December 2004. See YPO

3.2 ANALYZE AND SHARE WITH THE PUBLIC
This is not part of the programme between June and December 2004. See YPO

3.3 MAKE RECOMMENDATIONS
This is not part of the programme between June and December 2004... See YPO
4. MANAGEMENT PROVIDED

4.1 Develop finance and administration system
This is basically an in-house institutional strengthening and capacity building procedure in which Transparency International Pakistan will be supported by SDC to improve the management of the office functions. We hope to call upon the SDC for this support in the month of February / March 2005.

4.3 Develop Monitoring System.
This is also an in-house institutional strengthening and capacity building procedure in which Transparency International Pakistan will be supported by SDC to improve the monitoring functions of the programs under progress. We hope to call upon the SDC for this support during the month of February / March 2005.

DETAILED INFORMATION ON THE ABOVE PROGRAMS CAN BE PROVIDED ON REQUEST.