

Response to the International Development
Committee's request for information regarding
beneficiary evidence for its inquiry into
DFID's use of contractors

9th January 2016

Adam Smith International

Acronyms and Abbreviations

ASI	Adam Smith International
BPE	Bureau of Public Enterprises
CEO	Chief Executive Officer
DFID	Department for International Development
FRA	Forensic Risk Alliance
HMG	Her Majesty's Government
IDC	International Development Committee
MoS	Mail on Sunday
MoV	Means of Verification

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1. Executive Summary

On 4th December 2016 the Mail on Sunday made serious allegations regarding the conduct of Adam Smith International (ASI, “the Company”) in connection with testimonials received by the International Development Committee’s (IDC’s) inquiry into the Department for International Development’s (DFID’s) use of contractors. The IDC subsequently provided a list of 24 submissions to its inquiry into DFID’s use of contractors which had been rejected as suspicious, and commenced an investigation into the conduct of ASI.

This Response addresses the requests for information and answers the questions posed by the IDC in their letter of 12th December 2016, to which answers were required by 9th January 2017. Significantly, the Response provides strong evidence to demonstrate that all 24 of these submissions rejected as suspicious were genuine.

1.1. Methodology

Upon receipt of the letter from the IDC of 12th December 2016 the Company commenced an internal investigation process so that the answers to the questions posed by the Committee could be answered as thoroughly as possible in the time available. The Company retained specialist investigation expertise to advise on the appropriate process to put in place and the methodology that should be used. Key features of the investigation include:

1. A team was formed to lead the investigation that comprised of individuals who were not involved in the process of soliciting testimonials;
2. Data from the email accounts of the staff involved was quarantined by third-party experts using specialist software in order to guarantee its veracity;
3. Data was queried using search terms advised by third-party experts;
4. Data was analysed by the investigation team; and
5. Staff were asked clarifying questions where the quarantined data did not clearly provide the answers required by the IDC.

We believe the process established to conduct this investigation followed best practice guidance taking into account the deadline of the 9th January 2017.

1.2. Answers to the IDC’s questions

The following table sets out the key data that was determined by the investigation:

Table 1: Summary Table of Key Information

Question: How many submissions...	Answer
...were “faked” by ASI?	Nil
...were submitted without the approval of the beneficiary?	Nil
...were DFID involved in soliciting or preparing?	Nil

Question: How many submissions...	Answer
...were written by the beneficiary? ¹	13
...did ASI draft before being finalised by the beneficiary?	11
...were produced after the beneficiary had been briefed in writing or verbally by ASI that it was for an IDC inquiry?	24
...were submitted through the online portal by ASI staff?	18

This Response shows that:

1. DFID requested that ASI should support the IDC inquiry both with its own submission and that ASI should also solicit testimonials from beneficiaries: we understood that it was appropriate for DFID to be in contact with its implementing partners in order that the Committee would have a wide and balanced range of evidence-based information on which to base its analysis of UK aid and in particular the results of contracted interventions.
2. ASI agreed to DFID's request to solicit testimonials. ASI identified potential beneficiaries, alerted them to the IDC inquiry and supported a number of those beneficiaries in the submission of their testimonials. The process undertaken is outlined in *Section 3: Events and timeframe for submission of testimonials*. Given the short deadline, the busy schedules of beneficiaries, and logistical challenges, the task was not easy but ASI attempted to put in place as rigorous a process as possible given the deadline.
3. The answers to the questions that the IDC asked Adam Smith International are as follows:

Question 1 – What was the extent of ASI's involvement in the preparation of each item of written evidence?

- In all (24/24) cases, the support by ASI to the beneficiary to assist in the preparation of their testimonial was provided in good faith with the intent of obtaining professional and appropriate submissions. This support varied according to the need of the beneficiary submitting the testimonial: in one case, a hand-written testimonial was typed up and submitted on the beneficiary's behalf; in 11 cases ASI assisted in the preparation of the testimonial, in 6 cases ASI provided comments on the beneficiary's draft, and in 7 cases no ASI support was required in drafting the submission.
- In all (24/24) cases the beneficiary approved the final testimonial either verbally or in written form and this is supported by written contemporaneous documentation in 23/24 cases. For the one case where documentation was not identified, the beneficiary has since written directly to the IDC to confirm that he approved the submission.
- At least 10 testimonials were not submitted as approval had not been received from the beneficiary prior to the deadline on 23rd May 2016.

Question 2 – To what extent was it made clear to those writing or signing off submissions that the purpose of these submissions was as written evidence to an inquiry by the UK House of Commons International Development Committee?

¹We note that 13 of the 24 submissions were drafted by the beneficiary and in 6 of those cases ASI provided comments on their draft

- In all (24/24) cases the beneficiaries were advised in writing or verbally that the testimonials were written evidence to an inquiry by the IDC.

Question 3 – What involvement, if any, did DFID have in the solicitation and preparation of these submissions?

- DFID was not involved in the solicitation or preparation of any of the submissions (0/24).

Question 4 – How many of the submissions were submitted through the online portal by ASI staff?

- In 18/24 cases ASI submitted the testimonial on behalf of the beneficiary through the online portal so as to eliminate this administrative burden on them.

Question 5 – Why was authorship data altered or removed from the Word document submissions?

- The Company sent an email to staff providing standard Microsoft guidance on how to adjust metadata on Word documents. The intent of this email was to protect staff privacy and avoid misunderstanding over the ownership of the testimonials being submitted and made publicly available online.

1.3. Lessons learned by ASI

The investigation team believes that there are a number of important lessons learnt by ASI from this experience which we set out below:

1. In retrospect, it would have been better to have declined DFID's request to solicit testimonials. The task proved more onerous than expected, largely due to the tight deadlines (18 days to complete the entire assignment). Moreover, even though we conducted a process that ensured all evidence was either submitted by the beneficiary directly or by ASI with their approval, the Company's involvement has led to an incorrect perception that the testimonials were "suspicious". The Company regrets this perception which was due to over-enthusiasm in its desire to demonstrate the importance and effectiveness of UK development assistance.
2. The company was over-enthusiastic in its desire to demonstrate the importance and effectiveness of UK overseas assistance to help counter the bias against UK development assistance that has characterised/been prevalent in much of the UK domestic debate on the issue.
3. Whilst the company put in place a process that ensured all 24 submissions were authentic, it had to be adapted to the reality of a large number of beneficiaries accepting the request. The Company underestimated the size of the positive response and the communication and logistical challenge of following through with collecting the resulting testimonials given that a large number of beneficiaries were in remote and conflict affected locations. Given the challenges it became difficult to ensure that the structured process was applied in every case. While every beneficiary received either a written or a verbal briefing on the purpose of the submission, in some instances it appears that the briefing could have been more thorough. For example, three beneficiaries addressed their written evidence to DFID or to ASI rather than to the IDC.
4. The Company should have discussed DFID's request to solicit testimonials with Committee staff before undertaking it so that the intent was understood. We incorrectly relied on an assumption that DFID had been in communication with IDC staff. Similarly, to prevent misunderstanding, it would have been preferable to draw to the IDC's attention

the company instruction to its staff to remove metadata so as to protect their privacy and avert misunderstanding about authorship.

2. Methodology

The Committee, in a letter of 12th December 2016, asked ASI to provide specific information, namely:

- a. Copies of all of the emails referred to in the Mail on Sunday's article;
- b. The correspondence with beneficiaries relating to the preparation of written evidence to the Committee's inquiry;
- c. In order to verify ASI's claim that all of these submissions were signed off by each beneficiary, the Committee will also need to see the contemporaneous written approval from each beneficiary for each submission, as well as any contextual correspondence which made clear to each beneficiary the purpose of the submission as being to a parliamentary inquiry; and
- d. If this is not possible or does not exist, the Committee will require independent verification from each beneficiary that they approved the submission coming from them, and were aware of its purpose.

The Committee also asked ASI, in Annex B to its letter of 12th December 2016, to answer the following questions:

Question 1 – What was the extent of ASI's involvement in the preparation of each item of written evidence?

Question 2 – To what extent was it made clear to those writing or signing off submissions that the purpose of these submissions was as written evidence to an inquiry by the UK House of Commons International Development Committee?

Question 3 – What involvement, if any, did DFID have in the solicitation and preparation of these submissions?

Question 4 – How many of the submissions were submitted through the online portal by ASI staff?

Question 5 – Why was authorship data altered or removed from the Word document submissions?

The Committee, in Annex A to its letter of 12th December 2016, provided a list of 24 submissions that had been rejected and of which it indicated it is suspicious.

In order to answer these questions and to provide the information the requested by the IDC, an investigation team was appointed to:

- Gather the appropriate data;
- Analyse this data with the intention of responding to the questions asked by the IDC;
- Interview staff to obtain information where electronic data could not provide it;
- Establish whether a written request should be made to any beneficiary to clarify the nature in which their testimonial was written, approved and submitted;
- Answer the question as to why authorship data was altered in the process of submitting testimonials; and
- Write a response that provides the IDC with all the data that they requested as well as providing a documented narrative relating the facts concluded from the analysis of the data.

Individuals that were selected to carry out these tasks were chosen on the basis that they had no involvement in the exercise of providing evidence to the IDC inquiry into the use of contractors. They were:

- Dr Layth Bunni, Chief Executive Officer
- Jonathan Pell, Managing Director, New Markets
- Paul Davies, Practice Director, Government Reform

- Anna Rogers, Head of EU Team

In order to guarantee the veracity and purity of the data and to demonstrate that it could not have been changed, it was decided to 'quarantine' the data contained in all the email accounts of those ASI staff that had been involved in the solicitation of submissions from beneficiaries. After receiving professional advice from Forensic Risk Alliance (FRA) pertaining to the process of identifying and analysing the data, we commissioned an investigations specialist firm to provide us with access to specialist software that is commonly used in investigations of this nature. This was used both to quarantine the data and to conduct searches for relevant emails.

The software used, "Relativity 9", is electronic discovery (e-discovery) forensic software used in litigation and investigations where information is sought in an electronic format. Electronic documents uploaded onto Relativity 9 are accompanied by/contain metadata which paper documents do not contain. This plays a crucial part in investigations and evidence collection as it ensures/proves that the evidence (electronic documents) have not been tampered with in any way.

To support the response to the IDC, ASI used Relativity 9 to ensure all electronic information collected for this report and provided to the IDC, is quarantined and checked by the electronic software to safeguard data integrity and provide assurance that no tampering of data occurred.

ASI used the following methodology when compiling data to support responses to the 24 submissions under review:

1. Identification: 38 email accounts relevant to the IDC inquiry from 3rd May to 18th June 2016 were identified by the IT department to be submitted to FRA, a company who provided ASI with the Relativity 9 software.
2. Preservation: The above email accounts were put in a legal hold. This ensures no data can be destroyed.
3. Collection: All preserved email accounts were transferred to FRA.
4. Processing: FRA processed all files using Key Words provided by ASI following receipt of legal advice and those emails that were requested by the IDC. FRA checked that all files were genuine using various data culling techniques such as deduplication and de-NISTing. This process also included the extraction of text and metadata from the native files. Once all the checks were completed, FRA uploaded all processed data onto document review platform Relativity 9.
5. Review: Documents were reviewed for responsiveness to discovery requests. Four people at ASI were assigned access to Relativity 9: Layth Bunni, Jonathan Pell, Paul Davies and Anna Rogers. The Relativity search was performed by Jonathan Pell and Anna Rogers.
6. Production: Focused on the preparation of this response, that includes data extracted from the Relativity 9 software.

Emails from one member of staff's email account were reviewed without using Relativity as the individual was the member of a project that had its own email server that was hosted locally. In this instance a copy of the individual's mailbox was taken locally and transferred securely to ASI's IT team in London.

As indicated above, the IDC asked to be provided with "the contemporaneous written approval from each beneficiary for each submission." Noting that ASI was not responsible for drafting and uploading all the submissions, the investigation team made the assumption that contemporaneous written approval had been provided if the beneficiary had:

- Produced the entire submission;
- Submitted the testimonial to the IDC themselves;
- Produced the submission on their organisation's official letterhead;
- Physically signed the submission; and

- Produced the submission in hard copy.

In cases of insufficient contemporaneous documentary evidence or where clarification was required, with the IDC's prior approval we sought verification from each beneficiary that they approved the submission coming from them, and were aware of its purpose. An example letter sent to beneficiaries is included in *Annex C*. This verification was sent directly to the IDC from the beneficiaries, copying the ASI CEO.

This IDC response was then drafted by the team and submitted to the IDC.

3. Events and timeframe for submission of testimonials

In this section we present an account of the key events regarding the submission of testimonials to the IDC in order to provide important contextual information. We also address DFID's involvement in the overall exercise and explain why staff were advised to remove electronic metadata.

On 20th April 2016, Adam Smith International was informed by IDC staff of an oral evidence session on DFID's Use of Contractors and was asked to provide an oral witness at the hearing on 6th June 2016. The Company was later informed of a deadline to submit written evidence by 23rd May 2016. ASI started preparing its own written evidence and also sent suggestions to the Committee staff of another possible witness. This was not the first time the Company has been involved in providing evidence to the IDC. The company has long been a willing and enthusiastic supporter of the IDC and have a long history of making submissions that goes beyond that of most actors in the sector.

On 4th May 2016, ASI Director Peter Young received a phone call from a senior official in DFID requesting help to prepare for the upcoming IDC inquiry. In this phone call DFID sought assistance with both the provision of information for its own submission and in the solicitation of other submissions from beneficiaries by 23rd May 2016. ASI was asked in this phone call to convey these requests to other contractors.

The Company noted the tight deadline, especially given the communication difficulties involved in contacting a range of Ministers and officials in developing countries, some situated in dangerous, conflict-affected areas. However, given the importance of the inquiry and the need for the Committee to have access to a wide range of information on which to base its analysis, the Company agreed to DFID's request. We recognised that it was unlikely, in the extreme, that beneficiaries would have been independently aware of the IDC inquiry.

Thus, the Company decided to solicit beneficiaries of assistance – primarily developing country Ministers and officials – to submit testimonials to the Committee since they are uniquely placed to testify to its impact and value for money. The views of beneficiaries have been sought – for the same reason many times in the past, to support for example annual reviews, independent evaluations, letters to the UK Government, reports and press releases. We were aware of the nature of the views of the beneficiaries with whom we worked.

Therefore, as requested, Peter Young sent out an email to other contractors detailing the Company's understanding of DFID's request. He said that DFID would like, inter alia: a) For beneficiaries to be encouraged to submit written evidence; and b) for testimonials from beneficiaries to be given to DFID so that they could be inserted into DFID evidence.

The company decided that the work would be best done by ASI Project Managers and Team Members in the field, who work closely with the beneficiaries. The following steps were taken:

- On the evening of 4th May 2016 Peter Young wrote to ASI Project Managers asking them for their views on which beneficiaries might be prepared to submit evidence to the Committee and also asking for existing testimonials that could be used for our written evidence and that of DFID.
- On 5th May 2016 a follow-up email was sent to provide more detailed guidance, attaching the terms of reference of the inquiry.
- On 6th May 2016 a variety of existing testimonials were sent to DFID for use in their evidence to the Committee and a number of project managers suggested beneficiaries who might be prepared to submit evidence.

- From 11th May 2016, a number of responses were provided by Project Managers confirming that beneficiaries had agreed to provide submissions. Some stated that while the beneficiary in question was keen to help, he/she had asked ASI for help with drafting. Key managers at ASI therefore supported these beneficiaries.
- Some Project Managers asked ASI HQ to help with drafts, with one asking for an “ideal submission”. This was declined by ASI HQ as inappropriate and the importance of consulting each beneficiary to establish their views was emphasised.
- On 16th May 2016 Peter Young wrote to Project Managers explaining that where beneficiaries had requested assistance in the drafting of the testimonial, the Project Manager should discuss the issues with the beneficiary and take notes before producing a draft for review by the beneficiary. Various points to enquire with the beneficiary were suggested such as what has been achieved and whether it would have been achieved without the assistance. Staff were therefore clearly instructed that if assistance was requested that that assistance should be provided through a process involving the beneficiary so that their views were clearly reflected and stated in any draft prepared.
- On 20th May 2016 Project Managers were advised to remove electronic “metadata” detailing authorship so as to protect their privacy and avoid confusion over document ownership. Note: This is a normal practice when electronic information is published (There was no intent by ASI to mislead anyone through this action; indeed, it is arguably the case that leaving the metadata in place would have been misleading).
- On 23rd May 2016 at least 10 testimonials were NOT submitted as approval had not been received from the beneficiary prior to the deadline.

The nature of the support provided to beneficiaries varied depending on the needs of the individual, and is detailed for each submission in *Annex A*. The support provided by ASI was not unusual and reflects:

- The short time available for the document to be produced;
- The relationship of trust with the individual in question;
- The seniority and schedule of the individuals providing the testimony;
- The lack of well-organised office back-up support in many developing country institutions; and
- Limited written English language skills in some cases.

4. Summary analysis of testimonials submitted

This section of the response provides summary analysis of each testimonial submitted so as to establish clearly the answers to questions 1 to 4 asked by the IDC as well as confirm whether the testimonial was “faked” or not and if any testimonial was submitted without the approval of the beneficiary. The key questions therefore asked for each submission are:

1. Was it authentic?
2. Was it submitted without the approval of the beneficiary?
3. Was it written by the beneficiary?
4. Was it drafted by ASI before sending to the beneficiary for finalising?
5. Was it produced without the beneficiary understanding it was for the IDC’s inquiry?
6. Was it uploaded to the online portal by ASI?
7. Was it prepared with the involvement of DFID?

In *Table 2* below we provide for each of the 24 submission the answers to the questions 1 to 7 set out above.

Detailed analysis and supporting email evidence has been provided where it exists in *Annex A*. For submissions where we were not able to obtain email evidence, we conducted interviews with the relevant staff which were in the form of face-to-face meetings, telephone conversations and the completion of a questionnaire. The purpose was to answer a structured set of clarifying “sub-questions” that are also provided in *Annex A*. The means of verification (MoV) – email or interview – for the answer to each sub-question is identified in that Annex.

In 13 cases we concluded that the contemporaneous documentary evidence of beneficiary approval and the answers to the investigation’s team clarifying questions were insufficient to answer all the questions. With the IDC’s prior approval we therefore sought verification from each beneficiary of the following:

- That he/she approved the submission;
- That he/she either submitted the submission himself, or asked a member of ASI to do this on his behalf once the submission had been approved by himself; and
- That he/she was aware that the submission was to be submitted to a UK parliamentary inquiry (namely the IDC).

As agreed with the IDC, ASI’s CEO Layth Bunni wrote to those 13 beneficiaries on 29th December 2016 to request that they write directly to the IDC with their response. Each letter used the same template and language, an example of which is provided in *Annex C*.

Table 2: Summary analysis of each submission

IDC Ref.	Country	Was the submission...						
		authentic?	submitted without the approval of the beneficiary?	written by the beneficiary ?	drafted by ASI before being finalised by the beneficiary?	produced without the beneficiary understanding it was for the IDC's inquiry?	uploaded to the online portal by ASI?	prepared with DFID involvement ?
CON0001	Kenya	Yes	No	Yes	No	No	No	No
CON0002	Afghanistan	Yes	No	Yes	No	No	No	No
CON0004	Nigeria	Yes	No	No	Yes	No	No	No
CON0008	Somalia	Yes	No	Yes*	No	No	Yes	No
CON0009	Somalia	Yes	No	Yes*	No	Not yet confirmed	Yes	No
CON0010	Somalia	Yes	No	No	Yes	Not yet confirmed	Yes	No
CON0011	Afghanistan	Yes	No	No	Yes	No	No	No
CON0012	Sierra Leone	Yes	No	Yes*	No	No	Yes	No

IDC Ref.	Country	Was the submission...						
		authentic?	submitted without the approval of the beneficiary?	written by the beneficiary ?	drafted by ASI before being finalised by the beneficiary?	produced without the beneficiary understanding it was for the IDC's inquiry?	uploaded to the online portal by ASI?	prepared with DFID involvement ?
CON0013	Kenya	Yes	No	Yes	No	No	Yes	No
CON0014	Kenya	Yes	No	Yes	No	No	Yes	No
CON0015	Kenya	Yes	No	Yes	No	No	Yes	No
CON0018	Afghanistan	Yes	No	No	Yes	No	Yes	No
CON0019	Somalia	Yes	No	No	Yes	No	Yes	No
CON0020	Afghan	Yes	No	No	Yes	No	Yes	No
CON0022	Afghan	Yes	No	Yes*	No	No	No	No
CON0024	Sierra Leone	Yes	No	No	Yes	No	Yes	No
CON0025	Nigeria	Yes	No	No	Yes	No	Yes	No

IDC Ref.	Country	Was the submission...						
		authentic?	submitted without the approval of the beneficiary?	written by the beneficiary ?	drafted by ASI before being finalised by the beneficiary?	produced without the beneficiary understanding it was for the IDC's inquiry?	uploaded to the online portal by ASI?	prepared with DFID involvement ?
CON0027	Nigeria	Yes	No	No	Yes	Yes	Yes	No
CON0028	Nigeria	Yes	No	No	Yes	No	No	No
CON0034	Kenya	Yes	No	Yes*	No	Not yet confirmed	Yes	No
CON0035	Kenya	Yes	No	Yes	No	No	Yes	No
CON0036	Kenya	Yes	No	Yes*	No	No	Yes	No
CON0037	Kenya	Yes	No	Yes	No	No	Yes	No
CON0038	Yemen	Yes	No	No	Yes	No	Yes	No
		24/24	0/24	13/24	11/24	1/24 3 not yet confirmed	18/24	0/24

*denotes that ASI provided comments on the beneficiary's draft submission.

5. Conclusions and lessons learned

5.1. Key conclusions

After as thorough an investigation and analysis of the facts as possible in the short time available, including of the detailed correspondence between the Company and beneficiaries, the investigation team concludes that:

1. DFID requested that ASI should support the IDC inquiry both with its own submission and that ASI should also solicit testimonials from beneficiaries. We understood that it was appropriate for DFID to be in contact with its implementing partners in order that the Committee would have a wide range of evidence-based information on which to base its analysis of UK aid and in particular the results of DFID-funded programmes.
2. DFID was not involved in the communications with beneficiaries and/or soliciting or any of the testimonials.
3. ASI agreed to DFID's request to solicit testimonials. ASI identified potential beneficiaries, alerted them to the IDC inquiry and supported a number of those beneficiaries in the submission of their testimonials. The process that was undertaken is outlined in *Section 3: Events and timeframe for submission of testimonials*. Given the short deadline, the work and travel schedules of beneficiaries, and logistical challenges, the task was not easy. However, despite this, it should be noted that:
 - a. In all (24/24) cases, the support by ASI to the beneficiary to assist in the preparation of their testimonial was provided in good faith with the intent to obtain professional and appropriate submissions. This support varied according to the need of the beneficiary submitting the testimonial: in one case, a hand-written testimonial was typed up and submitted on the beneficiary's behalf; in 11 cases ASI assisted in drafting the testimonial, in 6 cases ASI provided comments on the beneficiary's draft, and in 7 cases no ASI support was required in drafting the submission.
 - b. In all (24/24) cases the beneficiary approved the final testimonial either verbally or in written form. In all (24/24) cases the beneficiary approved the final testimonial either verbally or in written form and this is supported by written contemporaneous documentation in 23/24 cases. For the one case where documentation was not identified, the beneficiary has since written directly to the IDC to confirm that he approved the submission.
 - c. In all (24/24) cases, the beneficiaries were advised that the testimonials were written evidence to an inquiry by the IDC.
 - d. In 18/24 cases ASI submitted the testimonial on their behalf on the IDC's online portal so as to eliminate this administrative burden on them.
4. Adam Smith International acted in good faith at the request of DFID to encourage beneficiaries of DFID contracted aid programmes to send in their own views on DFID's use of contractors direct to the International Development Committee. The Company did not "fake" submissions or seek to "con" MPs.

5. Whilst the information provided by the Company was clear about the intent of the testimonials as submissions to the IDC from beneficiaries in a few cases this instruction was misunderstood with beneficiaries writing testimonials for DFID and/or HMG.
6. There was one case cited in the Mail on Sunday article in which the beneficiary was contacted by the Mail on Sunday and quoted as saying he had not been told that the submission was for a parliamentary inquiry. Documentary evidence shows that this individual was informed that the submission was for a parliamentary inquiry and understood this point.
7. The Company sent an email to staff providing standard Microsoft guidance on how to adjust metadata on Word documents. The intent of this email was to avoid protect staff privacy and avoid misunderstanding over the ownership of the testimonials being submitted.
8. The Company was scrupulous in ensuring that each submission, where not fully written by the beneficiary concerned, was fully approved and signed off by the beneficiary. In the many cases where the beneficiary was not able to provide that approval, no submission was made.

5.2. Key lessons learned

The effort to encourage beneficiaries to submit evidence was conducted in a great hurry in a very short period. The investigation team believes that there are a number of lessons to be learned from this experience and we set them out below.

- In retrospect, it would have been better to have declined DFID's request to solicit testimonials. The task proved more onerous than expected, largely due to the tight deadlines. And despite conducting a process that ensured all 24 submissions were authentic, ASI involvement has led to an incorrect perception that the testimonials were "suspicious". The Company is, we believe, only found wanting in being over-enthusiastic in its desire to demonstrate the importance and effectiveness of UK overseas assistance. The enthusiasm that ASI displayed when seen against the relative lack of effort from other actors in the sector drew further attention to our attempts to encourage the submission of testimonials by beneficiaries. The Company needs to reflect on these points with care.
- The Company was over-ambitious in encouraging a large number of beneficiaries to submit evidence in the short period available. When a significant number indicated agreement but requested drafts, this put the company in a difficult situation which was not easy to manage, given communication problems, particularly in those cases where beneficiaries decided to help at the last minute.
- While it was not unreasonable for beneficiaries to request help from ASI in drafting submissions, and while ASI centrally did propose a structured process to draw out beneficiaries own views, it was difficult to ensure that this was applied in every case, given the time available, and particularly in respect of remote locations.
- We should have discussed the initiative with Committee staff before undertaking it. We did not do so because we had been asked by DFID to help and thought that they might have spoken to the Committee, but we should have done so nevertheless.
- Our request to ASI staff involved in helping with drafts to ensure that Word metadata did not identify them was made entirely in good faith and for good reasons, but again in retrospect it would have been preferable to draw this specific point to the attention of Committee staff, so no suggestion could be made of inappropriate behaviour.

- The effort we made to encourage beneficiaries to provide evidence to the Committee did succeed in valuable and informative information being provided direct to the Committee, all agreed by the respective beneficiaries involved. However, it was too ambitious in the circumstances.