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Mid-term Independent Project Evaluation of the

Global Programme segment

Asia-Pacific Joint Action Towards a Global Regime against Corruption (2016-2020)

GLOZ99 (Component funded by DFAT)
South and Southeast Asia

February 2019



This independent evaluation report was prepared by an evaluation team consisting of Mr. Pierre Robert (Lead evaluator) and Ms. Abigail Hansen (expert). The Independent Evaluation Section (IES) of the United Nations Office on Drugs and Crime (UNODC) provides normative tools, guidelines and templates to be used in the evaluation process of projects. Please find the respective tools on the **IES** web site: http://www.unodc.org/unodc/en/evaluation/evaluation.html

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ABBREVIATIONS AND ACRONYMS

Abbreviation	Full name	Abbreviatio	AbbreviationFull name	
ACC	Anti-Corruption Commission	OECD	Organisation for Economic Cooperation and Development	
ADB	Asian Development Bank	OHCHR	Office of the High Commissioner on Human Rights	
ASEAN	Association of Southeast Asian Nations	тос	Theory of Change	
APEC	Asia-Pacific Economic Forum	TOR	Terms of Reference	
CEB	Corruption and Economic Crimes Bureau	UNCAC	United Nations Convention against Corruption	
CIABOC	Commission to Investigate Allegations of Bribery and Corruption	UN-PRAC	UNDP-UNODC Pacific Regional Anti-Corruption Project	
CPI	Corruption Perception Index			
CPIA	Country Policy and Institutional Assessment			
DAC	Development Assistance Committee			
DFAT	Department of Foreign Affairs and Trade			
EU	European Union			
GAIN	Global Anti-Corruption Initiative			
IES	Independent Evaluation Section			
IGO	Inter-governmental Organisation			
IRM	Implementation Review Meeting			
KPK	Corruption Eradication Commission			
LDC	Least Developed Country			
MTE	Mid-Term Evaluation			
NGO	Non-Governmental Organisation			

MANAGEMENT RESPONSE

Recommendation		Management Response (accepted/partially accepted/rejected)
1.	Continued support to the fight against corruption. As respondents consulted during the evaluation process generally gave positive feedback, the project team should continue providing input and technical advice to the target institutions, prioritising areas where UNODC has unique expertise and skills, or where long-term UNODC input is appropriate. Consideration should be given, in this or in a potential third project phase, to increasing the project team staffing level, if feasible, to be more commensurate to the tasks and needs of national stakeholders.	Accepted.
2.	Prioritisation of sub-regional activities. The project team should consider, whenever possible, implementing more activities that bring together stakeholders at sub-regional level (e.g. groups of countries within South or Southeast Asia), where this can facilitate exchanges of experience and other synergies (for example if based on common legal systems).	Partially accepted. The project already implements some sub-regional activities. In the future those will be continued, but different factors (commonalities, capacity needs, financial flows etc.) might suggest tailored compositions of countries or a combination of the two sub-regions. Furthermore, additional national level support is often required and needs to be balanced against (sub-)regional support.
3.	Consideration should be given to further emphasising and making explicit the rights-based approaches used in the project and activities . This can include: legal advice; needs assessments and stakeholder consultations; legislative and policy drafting; codes of conduct; workshops, conference and other events; training tools and curricula; technical assistance; awareness raising; identification of stakeholders.	Accepted.
4.	Consider reviewing the mandate and structures of the anti- corruption institutions. The project team should consider the extent to which it could support target countries in reinforcing the anti-corruption institutions' ability to carry out their functions effectively and without undue influence.	Partially accepted. The project already focuses on support to anti-corruption authorities, particularly in relation to capacity development. The mandate and structures of anti-corruption institutions are considered under the Implementation Review Mechanism,

and advice or support may be provided upon request.

Consider broader inclusion of judicial institutions. The Accepted, within the resource project team should consider reviewing the relationship between specialist anti-corruption agencies and the broader justice sector, and consider ways in which the broader judiciary could benefit from the project's activities.

constraints of the project.

The project team is encouraged to further strengthen monitoring of the longer- and mid-term project results.

Accepted.

Gender issues should be monitored more closely relative to outputs and outcomes, and more strongly integrated in substantive outputs (see entry points at Recommendation 9, and also in line with the UNODC Strategy for Gender Equality and the Empowerment of Women (2018-2021).

Accepted.

Remarks on a potential third phase

- Needs assessments in a potential third phase should take account | Accepted. of the donor and economic context in which the anti-corruption institutions are operating, with a view in particular to encourage the institutions to seek additional bilateral funding to support their capacity development needs, whenever this is possible.
- Add advice on surveys to the "knowledge" pillar of the project. Countries should be encouraged to use diagnosis techniques to better understand the extent and impact of corruption. The recently issued UNODC Manual on Corruption Surveys is a good basis for additional advice to countries on this aspect.

Partially accepted.

The importance of diagnosis of the extent and impact of corruption is acknowledged. Within the frame of this project, the advice should focus primarily on the effectiveness of concrete anti-corruption efforts assisting ACAs and other stakeholders to improve their capacities to gather and analyse data and make data accessible.

10. Non-state actors: the project team is encouraged to make further efforts in directly consulting or involving the private sector and civil society, especially in relation to assessing the extent and impact of corruption and in prevention activities.

Accepted.

11. Needs exist in areas that the project does not cover, or covers only partially. Given the scale of the project, the scope for adding further areas of support may be limited The project team should consider providing additional support in specific areas as part of the design of a potential third phase. This could include some of the following: (a) Further supporting the development of standard operating procedures; (b) Mentorship schemes; (c) Technical assistance on asset recovery, beneficial ownership and foreign bribery; (d) Corruption prevention; (e) Impact of decentralization on governance.

Accepted.

EXECUTIVE SUMMARY

Background

This is the report of the mid-term Independent Project Evaluation (MTE) of a sub-project focused on South and Southeast Asia of the GLOZ99 global programme entitled "Global Programme to prevent and combat corruption through effective implementation of United Nations Convention against Corruption [UNCAC] in support of Sustainable Development Goal 16", implemented by the Corruption and Economic Crime Branch (CEB) of UNODC. The component that is the focus of this mid-term evaluation is entitled "Asia-Pacific Joint Action towards a Global Regime against Corruption" and is part of the Global Programme GLOZ99. The implementation of this component (hereafter referred to as "the project") began in October 2016 and is due to end in September 2020. The project is fully funded by the Australian Department of Foreign Affairs and Trade (DFAT) and has an overall budget of AUD7.47m (about US\$5.63m). The project covers 15 countries in South and Southeast Asia. A related project, entitled UNDP-UNODC Pacific Regional Anti-Corruption (UN-PRAC, XSPZ91), addresses the specific anticorruption challenges faced by Pacific Island countries.

The predecessor project or phase 1 of the project was entitled GLOX69 and included activities in multiple regions. For phase 2 a focus on South and Southeast Asia was agreed as well as the integration into UNODC's new Global Programme GLOZ99.

The overall goal of the project is to contribute to the goal of the GLOZ99 Global Programme by addressing three specific objectives: 1) to build the capacity of the States parties in the Asia-Pacific region to effectively implement UNCAC; 2) to provide support to States parties in the Asia-Pacific region, as well as to other stakeholders such as the private sector, to effectively coordinate their anti-corruption policies and efforts and to exchange experiences and best practices in fighting corruption; and 3) to develop knowledge tools to support the efforts of policy-makers, anti-corruption practitioners and other stakeholders to prevent and combat corruption. The outcomes are as follows:

- 1: Corruption is prevented and combated through effective implementation of UNCAC, with a particular focus on the Asia-Pacific region;
- 2: Coordination of anti-corruption programmes, initiatives and projects at all levels (national, regional, global) and with a wide range of stakeholders is promoted; and,
- 3: Knowledge on preventing and combating corruption is made available to policy-makers, practitioners and other stakeholders.

Purpose, scope and methodology of the evaluation

A team of two independent external consultants conducted the evaluation under the guidance of the UNODC Independent Evaluation Section (IES). According to the TOR, the scope of the MTE covers project activities in South and Southeast Asia from the start of the project in 09/2016 till the end of the field missions in August/September 2018. The evaluation is formative in nature – as such it is required to review and provide recommendations on the project's design and theory of change. The TOR require the MTE to assess successes, including inter alia, measures for replication, up-scaling, or prioritization, as well as areas for improvement, including concrete proposals for consideration in the

subsequent implementation of the project; it generates recommendations for immediate action to be carried out during the second half of the project period, as well as more holistic, visionary and forward-looking longer-term recommendations that could be taken into account in further programming, including for a potential third phase of the global programme.

Main findings

Design

The project design is sound in that it is clearly based on an intervention logic addressing the partner countries' commitments under UNCAC. In view of the number of countries targeted, a focus on commonalities is unavoidable. The project design appropriately tends to focus more on capacity-building of anti-corruption institutions than on legal reviews and advice to partner countries on institutional development. A further consideration in project design of the scope for awareness-raising targeting the private sector and civil society is suggested, though it is recognized that this may not be possible in the remaining project period – but may be addressed in a potential next phase. The logframe is an appropriate programme management tool. Future project designs should make clear how each project outcome and output is connected to the theory of change, and review the formulation of outputs and indicators for clarity.

Relevance

The project was generally very relevant to the needs and demands expressed by representatives of anticorruption institutions in target countries. The project responds well to the problems as analysed in the project document. The project also has a clear relevance to SDG 16, which addresses inclusiveness, justice and institutional accountability. However, its relevance could be enhanced by supporting the development in each partner country of further research on the extent and impact of corruption, particularly in relation to the sectors identified in the project document. There is also a case for considering ways in which support to key countries could be tailored to specific needs or institutional issues, particularly in countries that already have effective and independent anti-corruption institutions.

Efficiency

The project is efficient, in that it represents good value for money and helps provide assistance in a timely and effective manner to partner countries. Its added value also resides in highlighting UNODC's expertise and advisory capacity in the various aspects of the fight against corruption. The project benefits from the commitment and dedication of the team, which is performing its liaison and coordination tasks effectively and to the satisfaction of national counterparts. The team should continue to act as an "entry point" for national institutions to avail themselves of UNODC support; its staffing should ideally be reinforced to help ensure more continuity in support and advice to national partners.

Partnerships and cooperation

The project maintains appropriate partnership with UNDP and coordinates with UN-PRAC. Nevertheless, there is scope for enhancing the partnership between UNDP and UNODC in countries covered by the present project, for example if joint activities could be developed to engage civil society and the private sector in anti-corruption activities at the national, sub-regional or regional level. Cooperation between the project team and national institution is very effective. There again, the main constraint has been with human and financial resources — which means that national institutions are not always able to avail themselves of all the support that UNODC can provide in relation to the fight against corruption. It will also be important in future to ensure that UN Resident Coordinators are

better able to advocate for the advancement of an anti-corruption agenda, when dealing with senior government officials, on the basis of the achievement of the project.

Effectiveness

The project is generally effective: activities have been implemented under each of the three planned outcomes, which are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective. The project has been implemented as planned and has not encountered any substantive obstacles. Several factors have contributed to the effectiveness of the project, largely due to its relevance and the quality of inputs, but some room remains for this to be leveraged during the remainder of the project and for any future projects.

Impact

While it is premature to be definitive at this point, there are suggestions that impact is likely to be achieved in terms of enhanced interaction of anti-corruption agencies with their regional counterparts and the UN system, and in terms of the legitimacy of the anti-corruption agenda at domestic level within each country.

Sustainability

It is too early at the mid-term stage to develop a full assessment of sustainability. Sustainability was embedded in project design, and is implicit in the intended long-term impacts of the project. Specific elements of sustainability include developing the capacities of the beneficiary institutions and supporting implementation of UNCAC (in particular at the legislative and policy level).

Human Rights, Gender Equality and leaving no one behind

Human rights and gender equality are embedded in project design, and gender mainstreaming is implemented to some extent, however these could be considerably strengthened through greater integration in key project activities. "Leaving no-one behind" is not addressed by the project, but there is considerable relevance in integrating these elements, even at this stage of the project; this could be feasibly integrated into activities along with human rights and gender issues.

Main conclusions

The project design is sound in that it is clearly based on an intervention logic addressing the partner countries' commitments under UNCAC. The project appropriately focuses on common needs and demands identified through a participative needs assessment process.

The project design tends to focus more on capacity-building than on legal reviews and advice to partner countries on institutional development. The project is in line with UNODC strategies and the commitments of the target countries under UNCAC. Although there is no explicit process of prioritization among the 15 countries targeted, the project's activities in practice focus on about ten of the 15 target countries.

The project is relevant in that it is based on a sound analysis of the needs of each target country. The project's approach is appropriate to addressing identified needs, based on three outcomes. Nevertheless, the analysis and planned activities fail to sufficiently incorporate activities that target the private sector or non-government organisations. There is also an on-going need in many countries to address judicial bottlenecks that limit the effectiveness of the fight against corruption.

The project logframe is appropriately designed and provides a good reflection of the problem analysis. However, its description of some outputs and indicator lacks precision. This hampers somewhat its usefulness as a project progress monitoring tool.

The project has been generally effective: activities have been implemented under each of the three planned outcomes, which are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective. The project has been implemented as planned and has not encountered any substantive obstacles or delays.

The project's effectiveness is benefiting greatly from the skills and commitment of the project team members; the project management arrangement (team members based in a Regional Office, with management and administrative functions implemented from Headquarters) is a key factor in the effectiveness and efficiency of the project.

Factors contributing to the effectiveness of the project include its relevance and the quality of inputs and analysis, but there are constraints related to the lack of political will in some countries to address the fight against corruption. Advocacy on behalf of an anti-corruption agenda should be included in workplans during the remainder of the project and in any future projects.

Human rights and gender equality are embedded in project design, and gender mainstreaming is implemented to some extent, however these could be considerably strengthened through greater integration in key project activities.

"Leaving no-one behind" is not addressed by the project, but there is considerable relevance in integrating these elements, even at this stage of the project; this could be feasibly integrated into activities along with human rights and gender issues.

Main recommendations

Eleven recommendations are set out in the Summary Matrix and in the main body of the report. They are summarized below. Seven of those are the main recommendations for the om-going project. Four additional recommendations are made for a potential third phase. As respondents consulted during the evaluation process generally gave positive feedback, the recommendations below aim at strengthening the project further.

- 1. **Continued support to the fight against corruption.** Consideration should be given, in this or in a potential third project phase, to increasing the project team staffing level, if feasible, to be more commensurate to the tasks and needs of national stakeholders.
- 2. **Prioritisation of sub-regional activities.** The project team should consider, whenever possible, implementing more activities that bring together stakeholders at sub-regional level.
- 3. Consideration should be given to further emphasising and making explicit the **rights-based** approaches used in the project and activities.
- 4. **Consider reviewing the mandate and structures of the anti-corruption institutions.** The project team should consider the extent to which it could support target countries in reinforcing the anti-corruption institutions.
- Consider broader inclusion of judicial institutions. The project team should consider reviewing the relationship between specialist anti-corruption agencies and the broader justice sector.

- 6. The project team is encouraged to further strengthen **monitoring** of the longer- and mid-term project results.
- 7. **Gender issues should be monitored more closely** relative to outputs and outcomes, and more strongly integrated in substantive outputs.

Recommendations on a potential third phase

- 8. Needs assessments in a potential third phase should take account of the donor and economic context in which the anti-corruption institutions are operating.
- 9. Add advice on surveys to the "knowledge" pillar of the project. Countries should be encouraged to use diagnosis techniques to better understand the extent and impact of corruption.
- 10. **Non-state actors**: the project team is encouraged to make further efforts in directly consulting or involving the private sector and civil society.
- 11. The project team should consider providing **additional support in specific areas** as part of the design of a potential third phase, including further supporting the development of standard operating procedures; mentorship schemes; technical assistance on asset recovery, beneficial ownership and foreign bribery; corruption prevention; and impact of decentralization on governance.

Lessons learned and best practices

All lessons learned and included in the main body of the report. The main lessons learned are summarized here. One important reason for the good quality of project management – beyond the commitment and expertise of the project team – is the fact that the team is positioned in two appropriate locations, where their skills and functions are complementary. It is therefore advisable to ensure that the Vienna/Bangkok management arrangement be maintained in a future project phase. Another valuable lesson from the project to date is the apparent usefulness of "sub-regional" meetings: these meetings bring together countries that face similar corruption challenges. The project team should therefore consider making more use of this meeting format.

SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS

Findings ¹	Evidence	Recommendations to the project
	(sources that substantiate	team, CEB, UNODC ²
	findings)	
	Main recommend	
1. The project design was sound in that it was clearly based on an intervention logic addressing the partner countries' commitments under UNCAC. In view of the number of countries targeted, a focus on commonalities is unavoidable. The project design tends to focus more on capacity-building than on legal reviews and advice to partner countries on institutional development. The project was in line with UNODC strategies and the commitments of the target countries under UNCAC.	Project proposal, grant agreement Project documentation (annual reports, etc.) Interviews with stakeholders UNODC country and regional programmes	 Continued support to the fight against corruption. As respondents consulted during the evaluation process generally gave positive feedback, the project team should continue providing input and technical advice to the target institutions, prioritising areas where UNODC has unique expertise and skills, or where long-term UNODC input is appropriate. Consideration should be given, in this or in a potential third project phase, to increasing the project team staffing level, if feasible, to be more commensurate to the tasks and needs of national stakeholders. Prioritisation of sub-regional activities. The project team should consider, whenever possible, implementing more activities that bring together stakeholders at sub-regional level (e.g. groups of countries within South or Southeast Asia), where this can facilitate exchanges of experience and other synergies (for example if based on common legal systems).

¹ A finding uses evidence from data collection to allow for a factual statement. In certain cases, also conclusions may be included in this column instead of findings.

² Recommendations are proposals aimed at enhancing the effectiveness, quality, or efficiency of a project/programme; at redesigning the objectives; and/or at the reallocation of resources. For accuracy and credibility, recommendations should be the logical implications of the findings and conclusions.

The project was relevant in that it was based on a sound analysis of the needs of each target country.

The project's approach was appropriate to addressing identified needs, based on three outcomes.

Human rights and gender equality are embedded in project design, and gender mainstreaming is implemented to some extent, however these could be considerably strengthened through greater integration in key project activities.

"Leaving no-one behind" is not addressed by the project, but there is considerable relevance in integrating these elements, even at this stage of the project; this could be feasibly integrated into activities along with human rights and gender issues.

Project proposal, grant agreement

Project documentation (annual reports, etc.)

UNODC country and regional programmes

Consideration should be given to further emphasising and making explicit the rights-based approaches used in the project and activities. This can include: legal advice; needs assessments and stakeholder consultations; legislative and policy codes of conduct: drafting: workshops, conference and other events; training tools and curricula; assistance; technical awareness raising; identification of stakeholders.

Additional substantive areas and/or additional partners

- 3. The project has been generally effective: activities have been implemented under each of the three planned outcomes, which are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective. The project has been implemented as planned, and has not encountered any substantive obstacles. Several factors have contributed to the effectiveness of the project, largely due to its relevance and the quality of inputs, but some room remains for this to be leveraged during
- Project progress reports, reports from training activities Interviews with project team Interviews with stakeholders' representatives
- 3. Consider reviewing the mandate and structures of the anti-corruption institutions. The project team should consider the extent to which it could support target countries in reinforcing the anti-corruption institutions' ability to carry out their functions effectively and without undue influence.
- 4. Consider broader inclusion of judicial institutions. The project team should consider reviewing the relationship between specialist anticorruption agencies and the broader justice sector, and consider ways in which the broader judiciary could benefit from the project's activities.

the remainder of the project and			
for any future projects.			
	Project monito	ring	,
The project is generally effective: activities have been implemented under each of the three planned outcomes, which are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective. Several indicators are formulated in ways that are ambiguous or unclear.			The project team is encouraged to further strengthen monitoring of the longer- and mid-term project results. Gender issues should be monitored more closely relative to outputs and outcomes, and more strongly integrated in substantive outputs (see entry points at Recommendation 9 and also in line with the UNODO Strategy for Gender Equality and the Empowerment of Women (2018-2021).
On the basis of the above for recommendations related to a pote	_		are also formulating the following project:
A potential third phase will be based on lessons learned from this phase and on further analysis of the situation in each country.	Project proposal, grant agreement	7.	Needs assessments in a potential third phase should take account of the donor and economic context in which the anti-corruption institutions are operating, with a view in particular to encourage the institutions to seel additional bilateral funding to support their capacity development needs whenever this is possible.
There is a relative dearth of objective, impartial research on the impact of corruption in the target countries, based on solid methodologies. This is an area where UNODC's expertise may be brought to bear.	Project documentation (annual reports, etc.) Interviews with stakeholders UNODC country and regional	8.	Add advice on surveys to the "knowledge" pillar of the project Countries should be encouraged to use diagnosis techniques to better understand the extent and impact of corruption. The recently issued UNODC Manual on Corruption Surveys is a good basis for additional advice to countries on this aspect.
While the project team and national counterparts are aware of the need to engage the private sector and civil society, they are also aware of the need to prioritise the capacity development of national institutions. This need is being	and regional programmes	9.	Non-state actors: the project team is encouraged to make further efforts in directly consulting or involving the private sector and civil society especially in relation to assessing the extent and impact of corruption and in prevention activities.

met in the present phase, though	
it is recognized that capacity	
builing is a long-term process.	
National institutions	10. Needs exist in areas that the project
representatives and the project	does not cover, or covers only
team have highlighted the need	partially. Given the scale of the
for a third project phase to pursue	project, the scope for adding further
the current efforts and to address	areas of support may be limited The
new challenges.	project team should consider
	providing additional support in
	specific areas as part of the design of
	a potential third phase. This could
	include some of the following: (a)
	Further supporting the development
	of standard operating procedures; (b)
	Mentorship schemes; (c) Technical
	assistance on asset recovery, beneficial
	ownership and foreign bribery; (d)
	Corruption prevention; (e) Impact of
	decentralization on governance.

I. INTRODUCTION

Background and context

This is the report of the mid-term Independent Project Evaluation (MTE) of a sub-project focused on South and Southeast Asia of the GLOZ99 global programme entitled "Global Programme to prevent and combat corruption through effective implementation of United Nations Convention against Corruption [UNCAC] in support of Sustainable Development Goal 16", implemented by the Corruption and Economic Crime Branch (CEB) of UNODC. The component that is the focus of this mid-term evaluation is entitled "Asia-Pacific Joint Action towards a Global Regime against Corruption" and is part of Phase 2 of the GLOZ99 Global Programme.3 The implementation of this component (hereafter referred to as "the project") began in October 2016 and is due to end in September 2020. The project is fully funded by the Australian Department of Foreign Affairs and Trade (DFAT) and has an overall budget of AUD7.47m (about US\$5.63m).

According to the project document, the overall goal of the project is to contribute to the goal of the GLOZ99 global programme by addressing three specific objectives: 1) to build the capacity of the States parties in the Asia-Pacific region to effectively implement UNCAC; 2) to provide support to States parties in the Asia-Pacific region, as well as to other stakeholders such as the private sector, to effectively coordinate their anti-corruption policies and efforts and to exchange experiences and best practices in fighting corruption; and 3) to develop knowledge tools to support the efforts of policy-makers, anti-corruption practitioners and other stakeholders to prevent and combat corruption. The project document connects each specific objective to an outcome, as follows:

- Outcome 1: Corruption is prevented and combated through effective implementation of UNCAC, with a particular focus on the Asia-Pacific region. This is to be achieved through the provision of specialised anti-corruption expertise to States parties including legislative, policy and technical advice required to ensure effective follow-up to the findings of the UNCAC implementation review.
- Outcome 2: Coordination of anti-corruption programmes, initiatives and projects at all levels (national, regional, global) and with a wide range of stakeholders is promoted. This is to be achieved by seeking to improve the coordination and cooperation in addressing corruption among both States parties and technical assistance providers. The project also seeks to create opportunities for public-private dialogue and to help the private sector strengthen its involvement in anti-corruption activities.
- Outcome 3: Knowledge on preventing and combating corruption is made available to policymakers, practitioners and other stakeholders. This is to be achieved by identifying and filling
 knowledge gaps in preventing and combating corruption. Under the project, UNODC will

The first phase of the project was entitled "Joint Action towards a Global Regime against Corruption" (GLOX69). It was implemented over 48 months from September 2012, funded mainly by Australia. The budget of the first phase was just over US\$8.86m.

develop handbooks, practical guides, compendiums of best practices, training curricula, online tools and other information communication technology such as smartphone applications, that would be used as instruments to promote anti-corruption reforms.

Following the predecessor project GLOX69 mentioned above, the present project covers 15 countries in South and Southeast Asia; regionwide activities are also conducted with the Association of Southeast Asian Nations (ASEAN) and the Asia-Pacific Economic Cooperation (APEC) forum. A related project, entitled UNDP-UNODC Pacific Regional Anti-Corruption (UN-PRAC, XSPZ91), addresses the specific anti-corruption challenges faced by Pacific Island countries.

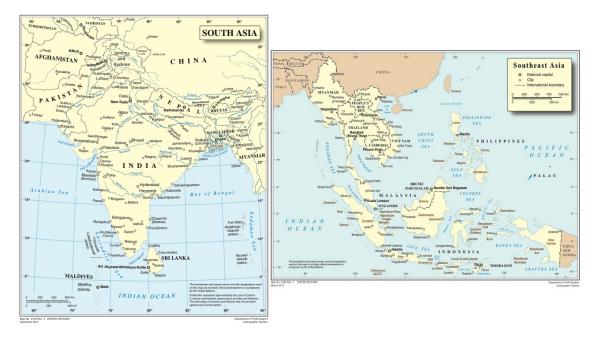
The project takes place in a wide range of national contexts, in which some countries have highly developed anti-corruption institutions and a lively public debate on the issue while other countries' institutions and public policies are giving the fight against corruption less prominence. Nevertheless, the countries have in common the commitment to implementing the provisions of UNCAC. In each sub-region (South and Southeast Asia) countries also have in common elements of their legal tradition, and in some cases a record of cross-border cooperation on law enforcement matters.

Purpose and scope of the evaluation

According to the TOR, the scope of the MTE covers project activities in South and Southeast Asia from the start of the project in 09/2016 till the end of the field missions in August/September 2018. The main users of the MTE will be the CEB Management and the project team, as well as DFAT. The evaluation is formative in nature – as such it is required to review and provide recommendations on the project's design and theory of change. The TOR require the MTE to assess successes, including inter alia, measures for replication, up-scaling, or prioritization, as well as areas for improvement, including concrete proposals for consideration in the subsequent implementation of the project; it generates recommendations for immediate action to be carried out during the second half of the project period, as well as more holistic, visionary and forward-looking longer-term recommendations that could be taken into account in further programming, including for a potential third phase of the global programme.

The following DAC criteria are assessed in the evaluation: relevance, efficiency, effectiveness, (expected) impact and sustainability. In addition, design, established partnerships and cooperation as well as aspects of human rights and gender mainstreaming are assessed. The evaluation specifically assesses how gender aspects are mainstreamed into the project. Furthermore, lessons learned and best practices are identified and recommendations are based on the findings formulated.

A team of two independent external consultants conducted the evaluation under the guidance of the UNODC Independent Evaluation Section (IES). The team comprised Abigail Hansen, lawyer and justice sector capacity building expert, and Pierre Robert (team leader), human rights and evaluation expert.



Above: outline maps of South and Southeast Asia (©UN). NB: not all countries on the maps are involved in the project.

Evaluation methodology

This mid-term evaluation follows a mixed-methods and gender-responsive and inclusive evaluation approach in line with UNEG and UNODC evaluation norms and standards as well as requirements. This involves contacts with beneficiaries and with informants who are not beneficiaries or targets of the project, but have relevant expertise. The data analysis includes secondary data assessed as part of the desk review as well as primary data collected during the field missions in form of semi-structured interviews and focus group discussions. Triangulation of sources, methods and theories ensures an objective as well as thorough analysis of all collected data, which forms the basis for formulating findings and drawing conclusion. Recommendations and lessons learned as well as best practices are derived from these analyses.

The evaluation team used the following information gathering tools:4

- Desk review and analysis this involved studying all documentation received from the
 project team; compiling other relevant documentation from public sources such as
 governments, NGOs, IGOs, academic institutions, etc. (including the evaluation reports of
 the predecessor projects and other projects against corruption); and using those to:
 - Formulate preliminary hypotheses that can be tested in the course of interviews;
 - o Triangulate against other sources of information such as interviews.

⁴ The timing and duration of the field visits were such that there was no time to observe project activities.

Although the evaluators met with people who had participated in project activities such as training sessions, these meetings fell in the category of semi-structured interviews and did not constitute focus group discussions because these individuals were met as part of broader groups.

• Semi-structured interviews with a range of stakeholders, including beneficiaries of programme activities – this involved discussing the project, on the basis of the evaluation matrix, and taking into account each stakeholder's particular area of work, level of knowledge or experience of the project, and other specificities. The evaluators also held meetings with independent experts and civil society representatives. These interviews followed the interview guide appended to this report. However, the guide being comprehensive, it was not expected that all individual interviewees address all the issues raised. The evaluators also made sure that interviewees were given opportunities to raise issues of their choice, even if they are not covered in the interview guide. Interviewees were also given time to address future needs, identify good practice that they would like to see reproduce, and raise any concern they had.

Key data sources for this evaluation

The evaluators received detailed information from UNODC. This covers the design of the project, reports about activities, outputs and outcomes achieved, as well as information on the management and reporting systems. In addition, the evaluators sought more information about each of the partner countries involved and researched relevant anti-corruption legislation and regulations, as well as other publications, in countries visited (see below). This body of information included UN documents (UNDAFs, reports published as part of countries' Universal Periodic Review process), reports by civil society organisations working on corruption, World Bank statistics, etc.

In addition to meeting stakeholders in each country visited, the team also conducted phone/Skype interviews with the individuals listed as implementation and strategic partners in the list in Annex III. In total, the evaluators met or interviewed 99 (80 M/19 F) individuals. Of these, the overwhelming majority were officials from anti-corruption institutions involved in the project and a minority were from civil society organisations and UN agencies. About four-fifths of those interviewed were men.

Selection of countries for visits

On the basis of their review of project documentation, and following an exchange with the project team, the field component of the mid-term evaluation has been organised so as to include the following components (see detailed calendar in annex):

- Visit to UNODC Headquarters in Vienna. This was an opportunity to meet the project team and other relevant Headquarters staff, including IES. As the visit took place during the week of the Implementation Review Group (IRG) and the Working Group on Corruption Prevention, it was also an opportunity for the evaluators to meet project stakeholders based in countries not visited. The visit took place from 3 to 5 September 2018.
- Visits to Bangkok Regional Office. The project is implemented in part with the support
 and involvement of staff at UNODC Regional Office in Bangkok. The field visit travel was
 organised to enable the team leader to visit the Bangkok Regional Office to meet staff and
 representatives of Thai project stakeholders. The visit to Bangkok took place 22-23 August.
- Country visits. A decision together with the project team has been made to visit the following five countries. The selection was made to reflect to the greatest possible extent the variety of national contexts in which the project is operating, the activities implemented to date and the availability of stakeholders. The selected countries were:

• South Asia:

- O Bangladesh. This is a country with substantial political and economic challenges, a cash-based economy, high poverty levels and vulnerability to money-laundering schemes. The Anti-corruption Commission (ACC) has initiated substantial activities and the project team reports that it has welcomed UNODC assistance in the area of investigation planning and management, special investigative techniques, financial investigations, as well as asset disclosures, conflict of interest and whistle blower protection. All of these issues are either already addressed within the project or are part of on-going plans. According to the project team the level of commitment to the project by Bangladesh high and the ACC seeks to significantly build their capacity and enhance cooperation with UNODC. As a least-developed country (LDC), UNODC also supports the participation of Bangladesh officials at regional and international events. The visit took place in the week of 23 July.
- Nepal. Nepal ratified UNCAC in 2011. The first UNCAC review took place in 2014/2015 and the second review cycle in 2017. Nepal has an extensive legal framework and institutional arrangement for combating corruption and had made significant progress towards complying with UNCAC requirements in many of the prevention and investigation aspects. However, the enforcement of legislation has remained a challenge, due to the lack of human and financial resources and capacity. The national counterparts recognize the need to strengthen the anti-corruption capacity and have stressed the need for a dynamic sharing of expertise, knowledge and good practice examples, in both investigative and preventive measures. Also, assistance has been sought from UNODC given that the new government, formed in February 2018 after elections in November 2017, is committed to a zero tolerance policy towards corruption, has started drafting a National Integrity Plan to address challenges in the private and public sectors. The visit took place in the week of 23 July.
- O Sri Lanka. The country's political and economic situation is relatively stables; the anti-corruption authorities face capacity challenges, according to assessments by UNODC, notably with regard to illicit cash inflows, complex corruption investigations and tracing of criminal assets. Sri Lanka is also a heavily cash-based economy. According to the project team, the management of the Commission to Investigate allegations of Bribery and Corruption (CIABOC) are committed to provide adequate training for their staff, to increase staff knowledge and skills base, and to support greater involvement and access to modern and international anti-corruption methodologies, expertise and practices. In Sri Lanka, the project seeks both to enhance institutional capacity and to encourage systematic analyses of the country's existing knowledge, positions and strategic and training needs. In a context in which other donors and institutions (EU, ADB, etc.) address governance and judiciary reform programmes, the project stakeholders in Sri Lanka have expressed interest in enhancing cooperation with UNODC. The project team reports that the

⁵ A constitutional crisis started to unfold in October 2018, after the country visit and drafting of this report. These developments might have an impact on the implementation of activities in Sri Lanka, but are outside of the scope of his MTE.

CIABOC is responsive to UNODC assistance, expertise and knowledge sharing. The visit took place in the week of 16 July.

• Southeast Asia:

- O Indonesia. The largest country in Southeast Asia, Indonesia is also a middle-income country with rapid economic development but persisting challenges in terms of poverty and inefficiency of the public administration, especially in certain provinces. UNODC has implemented various activities there thanks also to the presence of the country office and to a good relationship with the Corruption Eradication Commission (KPK). Indonesia, as one of the most technically advanced countries in relation to the fight against corruption, has a major role to play in the region-wide anti-corruption capacity building process. The present project effectively complements the national anti-corruption project evaluated in 2017.6 The visit took place in the week of 23 July.
- O Cambodia: Also a LDC, Cambodia presents development challenges. Anticorruption institutions lack resources and the ban of the opposition party for the elections July 2018 raised concerns among the international community. According to project documents, the Cambodian Anti-Corruption Unit as well as other agencies such as the Financial Intelligence Unit have been among the main recipients of assistance under the project. Legal development work has also been conducted in the country with support to the drafting of laws on witness and whistleblower protection and, and a law on access to information. The visit was timed to take place in late August, several weeks after the elections are complete. The visit took place in the week of 27 August.

The country visits were shared between the evaluators as follows: Abigail Hansen visited Sri Lanka and Indonesia and Pierre Robert visited Bangladesh, Nepal and Cambodia (as well as the Regional Office). Both consultants were present in Vienna during the first week of September. Sharing the country visits between the evaluators reinforced the efficiency and effectiveness of the evaluation by ensuring that a greater sample of stakeholders was met face-to-face, while keeping travel and other costs to a reasonable level.

The fact that the evaluators worked separately during the country visits did not hamper the effectiveness of the evaluation. The evaluators had worked together in the preparation of the inception report. The interview guide was a common tool for all interviews by both evaluators. The evaluators also visited Vienna together in September, where they were able to discuss the findings of field visits with the project team. They also liaised regularly during the field visits to share insights about evidence-gathering.

https://www.unodc.org/documents/evaluation/Independent Project Evaluations/2018/INDA03 Final Independent_Project_Evaluation_Report_April_2018.pdf

⁶ See:

Constraints and limitations

There were few material constraints affecting the evaluation. The evaluators were able to meet virtually all the project stakeholders they wished to meet in the various countries visited. The key limitation was that some national representatives were not met. Nevertheless, through country visits and meetings with stakeholders in Vienna, the evaluators met representatives from ten of the 15 countries covered by the project, which – combined with the written documentation – was sufficient to ensure a well-rounded overview of the achievements and challenges related to the project. These constraints did not have a material impact on the evaluation findings and recommendations.

II. EVALUATION FINDINGS

Design

Evaluation questions:

- To what extent has the log-frame been a useful programme management tool and to what extent is the intervention logic, including performance indicators, developed to enable measuring this projects' potential contribution to outcomes and impact?
- ➤ Is there a need for more prioritization or focus on specific areas considering the aim to coordinate the implementation with activities of other projects and optimal use of limited resources?
- ➤ To what extent has this project been designed to support the overall objective of GLOZ99 and to what extent have recommendations of previous related evaluations been considered during the design phase?

Intervention logic and theory of change

The project document refers to the theory of change (TOC) developed by CEB to guide its work on the global programme, of which the present project is a regional component. The global programme is organised around four "streams", each of which has its own sub-TOC (see illustration in Figure 1 on the next page). The four streams are: 1) Legal and institutional frameworks; 2) Human and organisational capacity; 3) Knowledge products; and 4) Political will to support UNCAC implementation.⁷

The figure on the next page illustrates the way the four streams support the achievement of the overall programme. In broad terms, each stream is connected to a project sub-objective. Thus, the Frameworks stream corresponds with the first sub-objective (effective UNCAC implementation); the Capacity stream fits with the second sub-objective (coordination to implement anti-corruption policies); and the Knowledge stream corresponds with sub-objective 3. The fourth stream, Political will to implement UNCAC, is in effect a cross-cutting element of the intervention logic, since political will is necessary to achieve each of the three planned outcomes.

The TOC of the overall programme is complemented for the purpose of the present project by a results-based framework, which spells out indicators for the achievement of each outcome. The outcomes are further broken down into outputs – also associated with quantitative indicators of achievement – and connected to activities. There are five planned outputs under Outcome 1, three under Outcome 2, and just one under Outcome 3. This to some extent can be explained by the nature

⁷ See: Global Programme to prevent and combat corruption through effective implementation of UNCAC in support of SDG 16, Annex VI of Programme Document.

of the outcomes: to the extent it covers the development of handbooks and guidance tools, Outcome 3 logically may apply to a range of countries on the basis of a single output. The project design also clearly took into account the recommendations of the 2015 mid-term evaluation of the first phase – particularly in relation to the use of measurable indicators, prioritisation and cooperation with UNDP.8

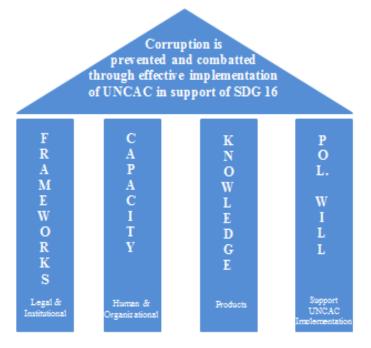


Figure 1: illustration of the four streams supporting the achievement of the global programme. Source: Global Programme Document, Annex VI.

The project covers two vast regions of Asia. As such the project document provides analytical data on the situation of corruption in multiple countries. Within these countries, the project document identifies specific target groups, including in particular: policy-makers; national anti-corruption agencies; law enforcement agencies; and the justice sector. Private sector entities, civil society organisations, the media and academic institutions are also mentioned, though the document makes clear that they are not direct project targets. The document does not provide detailed analyses of the situation of the fight against corruption in each country because of the regionwide project approach. However the document does provide a synthetic overview of elements that many UNCAC implementation reviews have in common across the target countries. These common elements concern matters of legislation, institutional development and capacity and other matters that are appropriately reflected in the formulation of the three project outcomes and nine outputs. As a result, the logical framework is a faithful reflection of the outcome of the analysis provided in the project document, and in that sense it is an appropriate project management tool.

⁸ See: Mid-term In-depth Evaluation of the Global Programme "Joint Action towards a Global Regime against Corruption" (GLOX69), October 2015, p.37.

⁹ These are: Bangladesh; Bhutan; Cambodia; India; Indonesia; Lao PDR; Malaysia; Maldives; Mauritius; Myanmar; Nepal; Philippines; Seychelles; Sri Lanka; Thailand; Timor-Leste and Vietnam. The countries in italic were covered under the first phase of the project which included Small Islands. They are not part of the target countries for this project, but it was agreed that they could potentially be involved in regional conferences or similar events. The project document also includes limited amounts of data about Brunei Darussalam, China, Mongolia and Singapore but these countries are not covered by project activities. 15 countries are thus the key target countries, 6 in South Asia and 9 in Southeast Asia.

The project document also devotes attention to the issue of synergies with UNDP. This is important because UNDP (unlike UNODC) has offices in each of the countries covered by the project, and because the project is designed to complement UNDP's Global Anti-Corruption Initiative (GAIN). The document summarises the similarities and differences in approach between the two organisations with regard to the fight against corruption. In short, according to the document, the UNDP approach focuses:

"on corruption as an *impediment to development*"; "capacity-building of agencies with particular focus on their preventive functions"; "linking anti-corruption work with the national development agenda"; and "advocacy and promotion of knowledge to change the attitude of population towards corruption" (italics added).

The document states¹⁰ that this approach complements that of UNODC, which:

"focuses on strategic implementation of anti-corruption reforms in line with the UNCAC, covering prevention, enforcement, international cooperation and asset recovery, including through addressing the findings of the implementation reviews; on coordination between partners and South-South exchanges to promote effective local practices in anti-corruption; and on developing practical tools and knowledge products to be used by policy-makers, anti-corruption practitioners and other stakeholders in the process of UNCAC implementation".

In this context, could the project design and logframe be improved? The following points emerge from document review and interviews:

The commonalities identified in the project document among the target countries formed a relevant basis to develop the outcomes and outputs of the project. On the other hand, this approach inevitably tends to de-emphasise issues that apply to some countries only – but which may impact the project in those countries. For example, as noted in the project document, implementation reviews have identified a number of recommendations to strengthen anti-corruption institutions in many countries. However the specific recommendations they made on this point have varied from country to country in ways that are not fully captured in the logframe. As a consequence, it would seem useful in future to make more explicit the links between review recommendations and project activities. However, doing so presents specific challenges. The evaluation shows that recent UNCAC review reports are not necessarily available at the time project documents are drafted. This may be the case for example if a new project document is drafted to implement a new phase of the present project: no more than half of the countries covered will have completed their reviews in time to be taken into account in a project document. This is why it is important to ensure that the project team maintains on-going consultations with stakeholders in target countries, with a view to understanding their needs and address them during project implementation. To make this possible, the programming approach proposed in project documents must be sufficiently flexible.

The project design has largely focused on building the capacities of the anti-corruption institutions of the target countries. However, UNCAC and the project document also refer to other aspects of the fight against corruption, such as the roles of the private sector and civil society. Although the project document clearly and appropriately prioritises support to anti-corruption institutions, the project's design would benefit from more explicit consideration of ways in which private sector companies could contribute to the fulfilment of UNCAC objectives. Similarly, the design of the project could give some additional space for the involvement of civil society. (The project team is considering supporting

¹⁰ See GLOZ99 project document, paragraphs 64 and 65.

¹¹ In suggesting this, the evaluators are *not* calling for adding new components to the project, as this would be difficult to achieve in view of resources constraints. Rather, they suggest that the project team should

enhanced engagement with the private sector and with civil society as part of a possible third project phase, which would incorporate (in addition to consolidating the achievements of the current phase in relation to investigation and prosecution capacity) a focus on prevention and could include activities implemented in cooperation with UNDP.)

An additional concern is that the TOC and its four "pillars" are not neatly aligned with the three outcomes and nine outputs of the project design. The table below attempts to link each output (summarised from the wording found in the project logframe) with one of the four "pillars" of the TOC:

Project outputs (summary wording)	TOC "pillar"
1.1 Legal framework strengthened	
1.2 Anti-corruption policies	(LEGAL & INSTITUTIONAL)
1.4 Justice sector integrity	FRAMEWORKS
1.3 Capacity to prevent corruption	
1.5 Investigation and prosecution	
2.2 Cooperation and exchanges	CAPACITY
3.1 Technical tools, knowledge products	KNOWLEDGE
(Underpinning capacity building	
activities)	
2.1 Coordination and cooperation	POLITICAL WILL
2.3 Anti-corruption and development	

The table could certainly be drawn up somewhat differently in the sense that some outputs may concern two or more "pillars". Nevertheless, it does provide relevant insights concerning the project design. Because the project outcomes (and therefore the outputs) are not explicitly linked to the TOC "pillars", it is difficult to assess the extent to which the TOC is actually being implemented through the design. It is, for example, not clear what output may be suited to supporting the strengthening of political will (we took the view that output 2.3 did so in that it was of a strategic nature). Also, the formulation of some outputs is vague: 2.1 and 2.2, for example, do not seem to differ sufficiently (according to the project team, 2.1 focuses on multilateral or bilateral technical assistance, whereas 2.2 primarily concerns bilateral exchanges amongst target countries – a fair distinction, but one that is not fully explicit in the project documentation).

Logframe as a programme management tool

In the evaluators' experience, based on interviews with many project management teams, a logframe needs to fulfil two conditions to be an appropriate programme (or project, as in this case) management tool:

• It should represent a fair and objective distillation of the project into outcomes, outputs and activities, with appropriate related indicators. This means that the formulation of outcomes and outputs in particular should be explicitly linked to the problem analysis, intervention logic and theory of change.

consider, if and when conditions allow, adding a small number of one-off activities to help raise awareness of private sector companies and civil society organisations about the ways they may contribute to the fight against corruption. Suggestions to that effect are made under the "Effectiveness" and "Partnerships and Cooperation" sections of the present chapter.

- O In this case the logframe is an appropriate reflection of the intervention logic, the problem analysis is clearly referred to in the formulation of the outcomes. In turn, most outputs are appropriately linked to outcomes. The two relative weaknesses in this regard are:
 - The relative similarity in the formulation of outputs 2.1 and 2.2. The activities referred to under each of these outputs suggest that 2.1 has an "international" dimension whereas 2.2 is meant to be regional or sub-regional, but it is not entirely clear how these two levels are distinguished (see also above).
 - It is not entirely clear why output 2.3, related to the UN Development Assistance Frameworks (UNDAFs) is necessary at all in the project, except perhaps as a way of linking it to the global programme, where the number of UNDAFs integrating anti-corruption elements is listed as an indicator. However, the global programme project document does not otherwise refer to UNDAFs in the problem formulation or intervention logic. It might be appropriate in future project design to review the formulation of this output, to link it explicitly to SDG 16. The project has a clear relevance to SDG 16, which addresses inclusiveness, justice and institutional accountability. However, the project's connection to the SDGs was not systematically made explicit to stakeholders, including in relation to aspects such as human rights and gender equality.
- The second condition for the logframe to be an appropriate management tool is that it should be conducive to relevant reporting, based on the objectively verifiable indicators and conducive to clear narrative reporting that addresses the strategic/intervention logic level of the project document.
 - In this case the logframe is conducive to such reporting. The project team has clearly devoted energy to document the extent of its implementation, despite sometimes vague indicators (see Effectiveness section). There are ambiguities in the formulation of some outputs and indicators (it can be questioned for example whether an international conference is a "service" improving coordination, as suggested under Output 2.1) but reporting by the project team amounts to a fair representation of the progress achieved by the project because the narrative aspects of the successive progress reports help understand the context in which the project is being implemented. It will be appropriate, when drafting the final report, to revisit the original intervention logic and theory of change, and assess the extent to which they were appropriate in practice.

Summary - Design

The project design was sound in that it was clearly based on an intervention logic addressing the partner countries' commitments under UNCAC. In view of the number of countries targeted, a focus on commonalities is appropriate and relevant.

The project design appropriately tends to focus more on capacity-building of anti-corruption institutions than on legal reviews and advice to partner countries on institutional development. A further consideration in project design of the scope for awareness-raising targeting the private sector and civil society is however suggested.

The logframe was an appropriate programme management tool. Future project designs should however make clear how each project outcome and output is connected to the theory of change, and review the formulation of outputs and indicators for clarity.

Relevance

Evaluation questions:

- To what extent are the outputs, outcomes and objectives of the project relevant to the anti-corruption needs and priorities of the governments in South and Southeast Asia, including from a broader socio-political and economic perspective?
- To what extent should the project generate additional corruption related knowledge products to ensure meeting the needs of recipients?

The project is clearly in line with the global programme of which it is a segment, as illustrated by the coherence between the project design and the global theory of change. The project is also consistent with the regional approaches developed by UNODC. For example, the overviews and data from the UNCAC Implementation Reviews for South and Southeast Asia¹² highlight common challenges faced by many of the countries in terms of law enforcement and international cooperation, as well as needs for technical assistance in relation to the implementation of UNCAC articles on such topics as money laundering (Art. 23); obstruction of justice (Art. 25); prosecution (Art. 30); specialised authorities (Art. 36); etc. All these issues are able to be addressed under the project as designed. The project objectives are also in line with UNODC's regional strategies.¹³

The project is also relevant against the UNODC strategic framework 2016-2017, whose subprogramme 3 ("Countering corruption") provides for UNODC to support Member States with technical assistance, encourage UNCAC ratification/accession, and improve Member States' capacity to fight corruption. These elements are all reflected in the present project, as are the main elements of the strategy outlined in the sub-programme (promotion of preventive measures and international cooperation, development of toolkits, etc.).¹⁴

Government needs and priorities

As UNCAC signatories, the target governments have undertaken to fight corruption in its various aspects. They are all countries that perform relatively poorly under international measures of corruption. 15 All the governments concerned affirm the importance of fighting corruption in the public

¹² See Overview and Data from the UNCAC Implementation Reviews for South and Southeast Asia (dated May 2018), section II.

¹³ See for example: http://www.unodc.org/southeastasiaandpacific/en/what-we-do/anti-corruption/overview.html and the Regional Programme for South Asia (2018-2021), section 5.2.3, where expected outcomes are set out in terms very similar to those used in the project document.

¹⁴ See: Proposed strategic framework 2016-2017 for UNODC, January 2014 (E/CN7?2014/CRP4), p. 10-11. The Thematic Programme "Action against Corruption, Economic Fraud and Identity-Related Crime (2012-2015) also contains similar strategic provisions. It also encourages (p. 24) partnerships with other UN agencies, international and regional organisations, along lines similar to those adopted in the project.

Index (CPI) developed by the NGO Transparency International, or the World Bank's Country Policy and Institutional Assessment (CPIA) are highly aggregated and therefore do not easily reflect specific reforms when these take place. The SDG indicator on target 16.5 is mentioned by the project team as a potentially useful tool to measure longer-term change. The recently issued UNODC Manual on Corruption Surveys provides guidance on survey-based assessments that, if and when implemented, are likely to offer more specific information about the incidence of corruption and the impact of reforms.

http://www.unodc.org/documents/data-and-analysis/Crime-statistics/CorruptionManual_2018_web.pdf

and private sectors. However, there are wide differences in capacity, knowledge and political will to address corruption among the 15 target countries. By its very nature, this project addresses anti-corruption issues that are common to all or most target countries, primarily on the basis of the Implementation Review Mechanism (IRM), which is central to the TOC.

In socio-political and economic terms, the project document refers to a number of specific impacts of corruption, using these to highlight the relevance of the project. It notes in particular that corruption impairs economic development, democratic governance and the administration of justice. It singles out the environment, health and education as sectors that may be particularly impacted by corrupt practices — with a cost that is made higher in developing country by the fact that they are often priority sectors for state spending.

It should be noted that despite this contextual analysis, the project does not specifically provide for the conduct of research into the precise extent (or impact) of corruption in the above sectors in the target countries. The logframe output concerning the "knowledge" pillar of the TOC refers only to handbooks, manuals and tools (such as a corruption risk assessment guide), but says nothing about diagnosis techniques about the extent and impact of corruption in the sectors identified in the project document. This is a relative weakness, which in this respect constraints somewhat the relevance of the project — though it is clear that the manuals and tools, whose development is supported, are also relevant elements.

It may be appropriate to consider the feasibility of undertaking some pilot research on one of the topics identified in the project document – for example on the impact of corruption in the education sector in two of the countries, one per sub-region. Doing so might bring valuable information on an aspect of "petty" corruption that, anecdotal evidence suggests, is extremely widespread. However, undertaking this type of research may require substantial financial and human resources and may not be possible – even on a pilot basis – in the remaining project period. However, a pilot project of this nature could possibly be considered in a subsequent project period.

To assess institutional and legal needs, the project team conducted needs assessment visits to most target countries, in which they assessed the institutional capacities of the main anti-corruption institutions, identified constraints and limitations and sought national partners' views. Stakeholders in countries visited were appreciative of these visits. The range of planned project activities was very relevant to begin addressing the needs thus identified: this included assessing legislation and policies in terms of their compliance with UNCAC, as well as capacity building for the staff of key anti-corruption agencies.

Though these steps were arguably basic, they were in line with countries' needs and with their national anti-corruption strategies, where these existed. The project thus helped lend a degree of "international" legitimacy and credibility to these existing strategies or capacity building plans (such as those developed in Bangladesh, Sri Lanka, or Nepal, according to project progress reports and interviews).

The needs assessments were a good tool to identify key needs and seek the views of target institutions' representatives. However, they did not explicitly address the concern that anti-corruption institutions do not always have the capacity or mandate to investigate the actions of all government officials, and that they have been reported in some countries to have suffered from political interference in the selection of individuals and organisations targeted for investigation. In some countries, the key weakness of the partner institution is that it is staffed by civil servants that rotate to other parts of

¹⁶ Interviews and civil society reports in countries including Bangladesh and Cambodia suggest that the problem is widespread in at least these two countries.

¹⁷ Commenting on an earlier draft of this report, the project team noted that work towards SGD16 indicators might facilitate such pilots, which could also be done in collaboration or coordination with UNDP. It should be noted also that UNODC has produced methodological guidance (see footnote 15 above), which can be used for such research.

government every few years, harming institutional memory and requiring training to be repeated regularly.

The evaluators carried out a comprehensive country-by-country review of project activities, based on progress reports. They recorded each country reference to assess whether some countries were the focus of more sustained activities than others. A result is that about 80% of all activities were focused on ten of the 15 target countries. The countries with substantially fewer mentions than others were India (which in practice is no longer considered a target country), the Maldives, the Philippines, Timor-Leste and Vietnam. This suggests that there may have been a degree of de facto prioritisation of some countries over others. Nevertheless this prioritisation, if deliberate, was in fact limited. Countries whose institutions were pro-active in seeking participation in project activities, or in raising concerns with the project team, received support irrespective of their "priority" level.

It might be advisable, to enhance the relevance of the project, to consider developing a two-tier approach in a future phase, in which some countries would receive basic support and others would be the objects of a more tailored form of support. Doing so, even if theoretically possible, would require an expansion of the project team.

Summary - Relevance

The project was generally very relevant to the needs and demands expressed by representatives of anti-corruption institutions in target countries. The project responded well to the problems as analysed in the project document. However, its relevance could be enhanced by developing more knowledge products, particularly in relation to the sectors identified in the project document, in which corruption has a major impact in the target countries.

There is also a case for considering ways in which support to key countries could be tailored to specific needs or institutional issues, particularly in countries that already have effective and independent anti-corruption institutions.

Efficiency

Evaluation questions:

- To what extent have the financial and human resources (inputs) been converted to outputs in a timely and cost-effective manner (in particular considering country-, regional- and global approaches for assessments and assistance)?
- To what extent has the project been catalytic towards the implementation of other projects or initiatives?

The project's efficiency may be assessed from two different angles:

• In terms of value for money: whether activities, outputs and eventual outcomes are consistent with the financial and human resources available to the project;

• In terms of project management: whether mechanisms and procedures are in place and in use to ensure timely implementation, quick reaction to changing circumstances, internal accountability within UNODC and external accountability to the donor and other stakeholders.

Use of resources

The documentation received so far includes a broad schedule of planned expenses. The TOR indicate that, as of end-March 2018 – 18 months into the 48-month project – about US\$1.55m had been spent and by mid-November 2018 about US\$2.58m. Had the project funds been spent at a constant rate since 1 October 2016, total spending would have been about US\$2.05m by the end of March and US\$2.97 by mid-November, which suggests that the project has currently underspent about US\$390,000 or 7%. This is no cause for concern. The relative underspending is mostly linked to staff costs and a reflection of the fact that it necessarily took some time for staff to be recruited into the project team and start operations. UNODC accounting rules also tend to cause planned budgets to be overestimated because they assume the highest possible cost for each staff position in terms of pay grade/level and allowances. It is also frequently the case that projects gather momentum in the course of implementation, resulting in more intense activities, and therefore a greater rate of expenditure, in the second half of a project's lifetime.¹⁸

As is to be expected in any project of this nature, major areas of spending – outside administrative expenses – include:

- Staffing of the project team in Vienna and Bangkok, and some management costs;
- International experts (consultants, trainers) hired for short missions;
- Logistical costs: conferences, accommodation, allowances, etc.

The distribution of costs is in line with the planned project outcomes. The project does not include capital expenses. In view of the documentation and interviews, the project was efficient in terms of the relationship between mobilised human and financial resources and the amount and quality of outputs produced and results achieved. The project's outputs were of a high standard, as was the level of expertise and technical advice provided by project team members and other experts. The stakeholders interviewed were appreciative of the quality of the experts present at conferences and seminars. The main concern expressed by some national stakeholders was the limitation in the number of participants from any one country in international meetings – an understandable remark from their point of view, but the limitation is justified by obvious budgetary constraints.¹⁹

The project did not suffer particular delays in the implementation of activities, and its administration appears to be running smoothly. As is the case with other UNODC projects, the administrative processes – specifically the Umoja, the UN Secretariat-wide financial management system – has given rise to some criticism. The system is relatively inflexible, for example when it comes to organising international conferences, because it requires administrators to provide detailed information about participants weeks in advance of events. This causes difficulties when participants cancel at short notice and need to be replaced. This concern, however, is not unique to this project and the team in Bangkok and Vienna has clearly been able to minimise any negative impact on national stakeholders – at the cost of increased workload for themselves.

¹⁸ Exchange rate gains related to the value of the US dollar in the 2016-2018 period may also account for some of the apparent underspending.

¹⁹ It is to be noted that national focal points are tasked with identifying participants from their country in international meetings. Some stakeholders interviewed felt that invitations to international meetings were not always circulated at national level among all the relevant stakeholders. It is difficult for the project team to monitor the dissemination of information about the project at national level. The team has no say about the way invitations to conferences and seminars are handled by national counterparts and the way participants are selected at national level.

Project management

The project is managed by a team split between UNODC's Vienna Headquarters and its Regional Office for Southeast Asia and the Pacific (ROSEAP) in Bangkok. Two full-time staff members in Bangkok – each leading the support to a sub-region, but closely working together and supporting activities according to expertise – perform the bulk of the country liaison and project coordination functions, while day-to-day project management, oversight and donor reporting are performed from Vienna. This project management structure helps ensure that national stakeholders have access to the project team within their own time zones, while the Vienna-based part of the team can ensure linkages with the broader anti-corruption programme, lead the development of global knowledge products and information exchange and fulfil reporting requirements. This apparently complex management arrangement is proving effective and efficient, in that it has so far helped ensure that project management was pro-active, acted in a timely manner to implement activities and manage financial aspects. The project has, largely as a result of this arrangement, been able to be implemented without major delay.

The effectiveness and efficiency of the project owe a lot to the dedication and commitment of the project team, which has pro-actively developed and maintained good working relationships with the partner countries. Interviews in countries visited showed that the project focal points in participating countries are appreciative of the support they receive from the project team. The team members' expertise on anti-corruption activities, and their ability to draw on broader UNODC expertise when necessary, contribute to the satisfaction of the national partners. For example, stakeholders in Bangladesh, Sri Lanka and Cambodia noted that the team in Bangkok had been responsive to requests for legal and policy advice, and helped ensure that the agenda of international meetings met their needs. The effectiveness of the project team in Vienna and Bangkok clearly contributed to the added value of the project, as it helped highlight to counterparts the legitimacy of UNODC's role as custodian of UNCAC.

Against this positive background, the efficiency of the project risks being hampered over time by workload issues. The project coordination tasks and liaison with national counterparts in over a dozen countries, mainly performed by the staff in Bangkok, are time-consuming and leave little time for additional research and field visits that would be necessary to better respond to needs and demands. Project team members spend substantial amounts of time on the road visiting partner countries and running international meetings, their ability to respond to requests inevitably diminishes during that time away from the office. The addition of a professional-level staff capacity in Bangkok would help provide more continuity in the liaison and coordination tasks, and would help the team respond better to partner countries' requests for technical advice.

It should be noted also that representatives of anti-corruption institutions in the beneficiary countries perceive the project team – in both its Vienna and Bangkok components – as their entry point to UNODC beyond the specific requirements of the project. As a result, the team performs liaison duties that go beyond the scope of the project and include for example the provision of information to national counterparts about the range of advisory functions available from UNODC. The needs of national counterparts often go beyond the support that is available through the project, and the team's function as an "entry point" for national institutions into UNODC is important to help address these needs, especially since UNODC does not generally have country offices in the region (the few country-based UNODC staff in the region do not always deal with anti-corruption issues).²⁰

²⁰ For example, it emerged during field visits that anti-corruption officials were often unaware that UNODC has experts who can offer advice on the design of surveys of the incidence of corruption, or that the

Summary - Efficiency

The project represents good value for money and helps provide assistance in a timely and effective manner to partner countries. Its added value also resides in highlighting UNODC's expertise and advisory capacity in the various aspects of the fight against corruption. The project benefits from the commitment and dedication of the team, which is performing its liaison and coordination tasks effectively and to the satisfaction of national counterparts.

The team should continue to act as an "entry point" for national institutions to avail themselves of UNODC support; its staffing should ideally be reinforced to help ensure more continuity in support and advice to national partners.

Partnerships and cooperation

Evaluation questions:

To what extent is the project/programme cooperating with other potential partners (including UN agencies, CSOs, academia, etc.) to achieve its objective and the achievement of the SDGs?

Interviews and reports show that the project team is effective in maintaining partnerships that contribute to the project's implementation. The project involves partnerships and cooperation at different levels:

Partnership with UNDP. This is central to the project because the project document requires "close cooperation and coordination" with the UNDP Global Anti-Corruption Initiative (GAIN) and because UNDP is also co-managing with UNODC the anti-corruption project focused on the South Pacific island states, UN-PRAC, which like the present project is also funded by DFAT. The project document describes UNDP's and UNODC's approach to anti-corruption as being complementary. It also refers to the 2008 Memorandum of Understanding (MoU) between the two organisations, outlining cooperation modalities on anti-corruption. The project document suggests that the MoU was reviewed ahead of the present project phase. In 2015, the mid-term evaluation of the previous global programme phase21 noted that, while UNDP-UNODC cooperation was generally good, some challenges arose including:

• Lack of operating procedures for engaging with governments, for example in countries where UNODC does not have a local presence. This concern has largely been alleviated thanks to the efforts of the project team and its pro-active engagement with national counterparts. The lack of UNODC country-level presence remains a disadvantage in comparison to other UN agencies. A discussion of the pros and cons of stationing UNODC representatives in partner countries is beyond the scope of this report – suffice it to say that, due to the range of highly specialised areas of public policy addressed by UNODC and the level of expertise required for

organisation had designed specialised software that may be of use to anti-corruption investigation agencies. ²¹ See: Mid-term In-depth Evaluation of the Global Programme "Joint Action towards a Global Regime against Corruption" (GLOX69), October 2015, p. 20.

meaningful support to national agencies, the presence of UNODC anti-corruption experts at the Regional Office level appears to be a realistic approach. It remains, however, that there is scope for more cooperation between UNODC and UNDP to jointly support the fight against corruption at national level in each country covered by the present project. In particular, UNDP and UNODC could develop joint activities to engage civil society and the private sector in anti-corruption activities.

• Unrealistic expectations on the part of some governments as to UNODC's ability to respond to requests for financial support. This concern remains to some extent, despite the explanations given by team members as part of their interactions with national institutions. As mentioned in the Efficiency section above, national counterparts often lack a full understanding of the range of services and advisory support that are available from UNODC. A related concern is that national counterparts often lack the funding necessary to obtain UNODC support beyond the scope of the current project. There may be scope for cooperation between UNDP and UNODC to help national institutions identify potential sources of funding for additional anti-corruption support.

There is also, potentially, and especially in the context of the reform of the UN system of country representatives, a need to reinforce cooperation between the project and the UN Country Team in each country, with a view to ensuring that Resident Coordinators are better able to support the project when dealing with senior government officials. While this issue goes beyond the remit of the present mid-term evaluation, it should be addressed by the project team during the remaining project period and a potential third phase, which will coincide with the implementation of the UN country representation system. (see below).

Partnerships with national anti-corruption agencies and other institutions. The project document notes (section 2.1) that the project should be responsive to the needs of target governments as they arise, "underpinned by strong partnerships and based upon impartiality, openness and mutual respect" (§80). It also notes that the project should foster partnerships amongst anti-corruption actors, including between government and private sector stakeholders (§85). On this basis, the project document defines criteria for prioritising requests for technical assistance (§86).

In practice, the partnerships with national institutions is very effective – indeed it is very much at the core of the project's impact. The key limitation to the development of partnerships and cooperation was the constraint on human resources. The team's energy being primarily devoted to liaison with the numerous institutional counterparts, it was difficult for them to also liaise with academia, civil society, the media and other relevant target groups that could help enhance the visibility and relevance of the work done in the region to fight corruption. Similarly, resources were not sufficient to meaningfully engage civil society and the private sector at the regional or sub-regional level. This resource constraint is unlikely to be alleviated in the remaining months of the project. However, it should be taken into consideration when planning the potential next phase, by adding a team member (full- or part-time), or by reallocating staff or country priorities.

Another limitation to this aspect of cooperation is that UNODC does not have a representative in each country who could advocate on behalf of the project at senior political levels. The project team members are recognised experts who can legitimately interact with working level counterparts in each partner institution, but this still leaves an unfulfilled need for high-level advocacy. This is why it would be important, in the context of the reform of the UN country representation system, to ensure that the project team has access to UN Country Coordinators to advocate on behalf of the project.

Summary – Partnerships and cooperation

The project maintains appropriate partnership with UNDP and coordinates with UN-PRAC. Nevertheless, there is scope for enhancing the partnership between UNDP and UNODC, for example if joint projects could be developed to engage civil society and the private sector in anti-corruption activities at the national or regional level.

Cooperation between the project team and national institution is very effective. There again, the main constraint has been with human and financial resources – which means that national institutions are not always able to avail themselves of all the support that UNODC can provide in relation to the fight against corruption. It will also be important in future to ensure that UN Resident Coordinators are better able to advocate for the advancement of an anti-corruption agenda, when dealing with senior government officials, on the basis of the achievement of the project.

Effectiveness

Evaluation questions:

- What are the main achievements of the project so far and to what extent are planned outputs and in particular outcomes achieved/on the way of being achieved?
- Which good practices could be identified for replication (e.g. in other projects or on other topics), up-scaling, intensification or prioritization to ensure to achieve outcomes and objectives in the most effective way?

On the basis of project progress reports analysis and of feedback received from interviewees and participants in training sessions, the evaluators found that the project has been generally effective in that activities have been implemented under each of the three planned outcomes, which together are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective.

Within each outcome area, the outputs have to date been achieved as planned, and in some respects beyond expectations. It is significant to note, for example, that capacity building plans have already been developed in six countries to improve detection, investigation and prosecution of corruption cases, whereas only three such plans are required to be completed by project's end. A number of other activity-level quantitative indicators have also been achieved or almost achieved at the current midpoint of the project, suggesting that they are likely to be over-achieved by 2020.

Against this generally positive background, at this mid-point in the project it is however not possible to attribute substantial objective achievements to the project, since many activities are still in progress. Nevertheless, the project is clearly contributing to strengthening implementation of UNCAC in the region, as demonstrated by the results achieved at the Output/ Outcome level as described below.

Challenges to effectiveness

The project has been implemented as planned, and has not encountered any substantive obstacles, whether practical or political. It did however have a slightly slower starting period due to on-boarding of staff, including the recruitment and placement of the Adviser (Anti-Corruption) and a Regional Anti-Corruption Adviser in May 2017. However, the team has more than caught up any lost time, and has since made good progress, capitalising on strong networks of counterparts in both regions.

Effectiveness at output/outcome level

The project's overall objective ("Corruption is prevented and combatted through effective implementation of UNCAC in support of SDG 16") mirrored the outcome level of the project. To establish a concrete link between the global programme and implementation of relevant targets under SDG 16, in the 2030 Agenda, a composite indicator and corresponding means of verification was developed in close consultation with the research branch and other key stakeholders. Outputs and outcomes are closely tracked, through regular progress and activity reports provided by each of the project managers, which are then consolidated by UNODC Headquarters in a single overview document.

Outcome 1: Corruption is prevented and combated through effective implementation of UNCAC, with a particular focus on the Asia-Pacific region.

According to current activity and other reports, confirmed through interviews during field visits, Outcome 1 is clearly furthest along in terms of effectiveness and also the biggest in terms of numbers/volume. The October 2018 overview of achievements lists the overwhelming majority of activity-level indicators as either already achieved, or well on the way to being achieved over the project period. Some notable outcomes include:

- Provision of advice by CEB on legal provisions to Cambodia, Vietnam, Thailand and Sri Lanka (4/4);
- Provision of advice by CEB on whistle-blower protection to Lao PDR and Cambodia (2/2);
- CEB support to assessments in Bhutan, Nepal, Bangladesh, Cambodia, Viet Nam, and Lao PDR) (6/3); and
- Very encouraging workshop evaluation results (83%, 87% and 93% indicating that knowledge had been increased under differing sub-indicators).

These results may however be qualified to some degree:

- Quantitative indicators may have been drawn up in an overly conservative manner, although a closer examination of sub-indicators demonstrate that these were both reasonable and feasible;
- The indicators do not fully encompass the quality of the activities' achievement. The team does measure knowledge increase and asks training participants whether acquired skills were used. While it should be recognized that it is difficult to do more in a regional project covering so many countries, it might be useful for the team to also ask stakeholders to report about other changes in their countries, even if those cannot be described as direct consequences of the project such as for example legal changes, major new prosecutions, new safeguards against corruption, whistleblowing mechanisms, etc.
- Related to the above, a number of indicators are expressed in relatively vague terms ("increased knowledge", "provided advice", "apply in practice") and give no indication as to how these are to be assessed;

• There is a degree of overlap between needs assessments (activity 1.1) and capacity assessments (activity 1.5), hence leading to a potential "double attribution" of outcomes.

Outcome 2: Coordination of anti-corruption programmes, initiatives and projects at all levels (national, regional, global) and with a wide range of stakeholders is promoted.

The degree of effectiveness of Outcome 2 has been more difficult to ascertain, since this focuses on relatively long-term developments such as international cooperation against corruption and the practical use of skills acquired through training. In addition, the design of some of the activities under this outcome requires lengthy consultation, which is itself an on-going process. It is also important to note that some activities under this outcome are closely linked to the regional agenda (APEC meeting, ADB and OECD events, etc.). It is therefore premature at this point to fully assess the effectiveness of this outcome's achievement. Similar to Outcome 1 above, however, some indicators are also expressed in vague terms ("improved coordination", "provided advice", "apply knowledge"), which will render their final assessment more difficult.

Nevertheless, implementation appears to be progressing at a pace in line with the project's work-plan, with a number of key outputs having already been completed, and notably:

- Facilitation of a regional conference to create a regional Platform on "Fast-tracking Implementation of UNCAC [...]" (jointly funded with another project); and
- Provision of services to improve coordination and cooperation, relative to the TF expert meeting (October 2016), ADB/OECD regional conference (November 2017), IACD (December 2017), and G20 Anti-Corruption Working Group meetings in 2016 and 2017 (5/5).

Outcome 3: Knowledge on preventing and combating corruption is made available to policy-makers, practitioners and other stakeholders.

Outcome 3 focuses on the development of knowledge and know-how about anti-corruption, through the development of manuals and other technical tools. At the time of writing, the activities under this outcome are yet to be implemented, and hence it is premature to assess their effectiveness. Similar to Outcome 1 above, some indicators are also expressed in vague terms ("satisfied with quality", "use manuals", "use knowledge to inform policy"). Attribution of certain outcomes will also be ultimately difficult to ascertain, notably relative to the outputs aimed at informing national policy efforts, particularly in contexts that are planning or already undergoing extensive nationally-generated and/or donor-supported reform processes.

General factors contributing to effectiveness

The following provides an indication of the factors that have contributed significantly to effectiveness to date:

- Stakeholders underlined the links between anti-corruption efforts and flow-on effects relative to organised crime, anti-money laundering, anti-terrorism, people and drug trafficking and illegal flows of immigration (which form a part or consequence of corruption), and hence the importance of including institutions working on these issues in activities and consultations. They reported that the project has helped enhance cooperation between such bodies.
- The project's needs assessments and reviews have raised many elements of potential leverage and areas of potential cross-pollination.
- The degree of implication of institutional and overall political will across the region is highly variable, which in turn has a clear impact on effectiveness. In this respect, stakeholders

- described the national presence of UNODC as a positive factor in effectiveness not only in terms of technical competence, but also by providing on-the-ground engagement at the political and institutional level.
- Stakeholders consistently state that the quality of UNODC analysis is very high, and that exchanges are particularly fruitful.
- Many anti-corruption and related agencies do not have international divisions, which is cited as a significant constraint in the implementation of activities, and hence their effectiveness; nevertheless, overall absorption capacity has not been raised as a difficulty.
- Ownership of the outputs and outcomes is very high, with one interlocutor for example stating that "the content is ours".

Elements that may contribute to greater effectiveness

The following provides an indication of the factors that could contribute to greater effectiveness in the future (recognizing that resource constraints may hamper the implementation of these suggestions in the remaining project period, and that not all of these may be implemented in a potential third phase):

- Considerable scope appears to exist to utilise more transnational/ bilateral/ multilateral approaches, including (but not necessarily limited to) linkages between countries of varying levels of competence. This has already been evident, for example when KPK Indonesia provided training to Timor Leste counterparts and hosted other countries (e.g. Afghanistan and Bangladesh)— but KPK would itself like to benefit from expertise from Singapore and Malaysia, which are generally seen as centres of excellence in the region.22
- Some countries (e.g. Sri Lanka), while highly involved in and committed to the project, are also recipients of considerable attention and resources from international donors and organisations, and investment partners, which has created a feeling that institutions and governments are "running after opportunities, without being strategic". Crowded international "markets" therefore may ironically represent a risk to effectiveness in certain contexts. Whilst this has not been problematic to date, beneficiary institutions may therefore need more guidance in this respect, and needs assessments must take into account the full donor and economic context.
- Effectiveness is often hampered by legislative schedules, which has impacts on the sequencing of project outcomes (for example in Sri Lanka relative to an asset disclosure law in relation to which UNODC provided technical assistance, but which is yet to be adopted). The need to more directly engage/involve civil society and the private sector was consistently raised by stakeholders. Feedback received suggests that the most effective way to engage the private sector is to address companies, trade associations, chambers of commerce, etc., with focus on a particular economic sector or type of contractual relationship such as the forestry sector or the public procurement process.
- Several interlocutors indicated that significant bottlenecks occur at the judicial side, and also that the judiciary often lacks the specific skills to adjudicate complex cases. While the judiciary is indeed targeted by some project activities, this suggests that thought could be given to broadening their involvement.
- Some concern was raised about the extent to which UNODC assistance reaches rural communities, particular in large, highly geographically, economically and socially fragmented,

²² In October 2018, the project partnered with the Singapore CPIB to deliver a joint training to countries across South and Southeast Asia, including Indonesia. This is the sort of event that interviewees suggested are among the most useful to them.

- and highly centralised contexts such as Indonesia. This underscores the need to integrate issues relative to vulnerable groups discussed below.
- Civil society involvement (including human rights and gender equality activists) could usefully include religious and moral leaders, who have considerable social leverage at every level.
- Monitoring of the longer- and mid-term project results, and their operationalization needs to be further strengthened: while it is clear what had been "done", it is uncertain "what happened next", particularly at the national level, and the extent to which UNODC has contributed to observed changes. In addition, and related to this, additional support could be provided to developing (and subsequently following) national implementation plans and road-maps.
- Specific areas where additional support would be appreciated by stakeholders met during field visits included;
 - o Development of standard operating procedures;
 - o Development of mentorship schemes;
 - o Integrating the outcomes of the recent Colombo meeting (development of indicators, etc.);
 - O Technical assistance and capacity building relative to asset recovery, beneficial ownership, and foreign bribery;
 - o Greater emphasis on prevention issues; and
 - o Support relative to decentralisation (police, local and municipal authorities).

Summary – Effectiveness

The project is generally effective: activities have been implemented under each of the three planned outcomes, which are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective. The degree of effectiveness of Outcome 2 has been more difficult to ascertain, since this focuses on relatively long-term developments such as international cooperation against corruption and the practical use of skills acquired through training.

The project has been implemented as planned and has not encountered any substantive obstacles.

Several factors have contributed to the effectiveness of the project, largely due to its relevance and the quality of inputs, but some room however remains for this to be leveraged during the remainder of the project and for any future projects. It is important also, to maintain the effectiveness of the project and contribute to its sustainability, to reinforce the monitoring of results achievement in the medium to long term.

Expected impact

Evaluation questions:

- To what extent has the project successfully promoted peer-learning and knowledge exchange and how could this contribute to expected impact?
- Were any secondary benefits or unexpected impacts achieved beyond those included in the logical framework? If so, what were those?
- ➤ To what extent is the project contributing/likely to contribute to supporting the implementation of the SDGs and to counter corruption in the recipient governments?

It is clearly too early at mid-term stage to assess impact as such, for obvious reasons of timing. It is also important to bear in mind that in several – not all – target countries the present project is only one of a range of anti-corruption activities implemented with the support of bilateral or multilateral donors. This makes attribution of impact more difficult in these countries than in others, where few other anti-corruption activities take place. Despite these caveats, it is possible to discern through interviews, and to a lesser extent through document analysis, a number of elements of likely impact that may be confirmed over time. These are all of a qualitative nature, subjective to some extent, and cannot yet be described at institutional or mainstream trends – however there is scope for them to become so.

One notable element of likely impact that emerges from interviews is a change brought about by the very fact that this project brings together national stakeholders with their counterparts in other countries and with UN mechanisms. Some interviewees have noted that the project was their first opportunity to exchange experience with counterparts in the region, and with the broader "community" of anti-corruption officials working on UNCAC implementation. Some countries have already taken advantage of interactions to conduct study visits or host foreign delegations, and more such actions are likely to be taken in the remaining project period. These interactions can help national institutions engage in a kind of informal benchmarking, comparing their performance or work methods to those of counterparts in other countries. Similarly, as happened for example through joint meetings of the institutions from Mekong Basin countries, the project is helping institutions identify commonalities in the challenges they face, and may be fostering an understanding that joint action in certain fields is in their shared interest.²³ To this extent, the project is likely to contribute to more support among target institutions for exchanges with regional counterparts.

Another element of likely impact is related to the increased familiarity of the target institutions with UNODC, through their participation in international meetings and – more importantly in terms of day-to-day activities – through interaction with the project team members in Bangkok and Vienna, and with other UNODC experts. This element is likely to matter most to institutions that are not as experienced as those in Singapore or Indonesia because they need more input in basic matters such as standard operating procedures and have less access to domestic expertise in such fields as investigation, financial intelligence, money-laundering, etc.

A third area of likely impact may concern the visibility of the anti-corruption agenda itself, in the domestic political/policy debate, in some of the target countries. The project helps anti-corruption agencies demonstrate that they are contributing to the fulfilment of an international agenda, which may be perceived as more legitimate and as ultimately beneficial to the overall development of the countries. The connection between the project and the fulfilment of the SDGs is a good entry point to reinforce the legitimacy of the fight against corruption.

To maximise the likely impact of the project, it will be important to continue fostering region- and subregionwide exchanges and to further disseminate information to the target institutions about the forms of support that they can receive from UNODC Headquarters beyond legal support and expertise (including advice on research and surveys, IT advice, etc.). It will also be important to complement the project team's interactions with institutions with advocacy at Country Representative level.

²³ In the long term, joint cross-border anti-corruption action will likely become increasingly relevant, especially in view of the rapid economic integration of the regions. Smugglers and other corrupt actors who may use legal loopholes (or political protection) in their country of origin may be more vulnerable to investigation and eventual punishment in other countries with which they trade.

Summary - Expected impact

While it is premature to be definitive at this point, there are suggestions that impact is likely to be achieved in terms of enhanced interaction of anti-corruption agencies with their regional counterparts and the UN system, and in terms of the legitimacy of the anti-corruption agenda at domestic level within each country. Efforts are needed in the remaining project period to reinforce these likely elements of impact, including in terms of high-level advocacy.

Sustainability

Evaluation questions:

- Does the project create the possibility, including systems and structures, for the project results to continue after the end of the project? And to what extent can the project contribute to sustainability of anti-corruption efforts in the recipient governments?
- Considering the regional design of the project (in contrast to country-level projects), in which way could the project further strengthen sustainability of its results?

It is too early at the mid-term stage to develop a full assessment of sustainability. It is noted however from project documents that sustainability is a function of UNODC's own commitment and capacity to continue its engagement with participating countries over the long term. One element of sustainability is therefore related to UNODC's (and UNDP's) post-2020 programming. It should also be borne in mind that sustainability varies substantially from one country to another in the two regions; this in turn may influence UNODC's engagement beyond the present project period.

Sustainability was embedded in project design, with one assumption (§166 Project Document) being that South-South exchanges and mutual learning encourage sustainability. The Project Document also underscored (§80 and §87) the importance of responding flexibly, rapidly and effectively to the needs of target countries, while prioritizing technical assistance delivery focusing on long-term and sustainable solutions instead of one-time events, in particular those relates institutional structures and processes, coordination mechanisms and train-the-trainer programmes. Policy guidance and technical assistance delivery in turn provides a logical link between the project events (seminars, working groups etc.) and activities on the ground.

Specific elements of sustainability that are implicit in the intended long-term impacts of the project include increased membership to UNCAC, improved participation in the Implementation Review Mechanism and improved follow-up to the findings and recommendations of implementation review (enhanced accessibility, coordination, coherence and consistency of technical assistance, resulting in a strengthened implementation of UNCAC). It is also considered that strengthening the capacities of specialised anti-corruption bodies and national criminal justice systems will foster broader and more qualitative implementation of the Convention. Furthermore, supporting the creation of wider alliances (encompassing non-State actors, including the private sector and civil society) will help ensure full and sustainable implementation of UNCAC, with broad international cooperation ensuring continuity of anti-corruption efforts and the international community's involvement.

At the broader level, it is considered supporting partner countries' implementation of UNCAC will help improve the impact and sustainability of national efforts to advance political, economic and social development, and enhance international and regional stability and security, as recognized in Goal 16 of the SDGs.

At the outcome level, the training, training tools and other capacity-building elements of the project demonstrate strong elements of sustainability, since acquired skills and expertise remain with those who participated in these activities, and as a result enhance the overall capacity of the institutions to which the participants belong. The effectiveness of the training sessions and technical assistance, combined with their high quality, is broadly recognised by stakeholders, and representatives of beneficiary institutions repeatedly emphasised the benefits of capacity-building activities to their staff and institutions.

The sustainability of capacity building activities is however seriously limited by difficulties related to staff turnover in most beneficiary institutions in all countries visited. This was however considered by stakeholders to be offset considerably by the highly-specialised nature of the roles and skills of the individuals concerned (and hence of the support received), which renders rotation within or between institutions or ministries far less likely, and thus minimises dispersal of the project's contributions.

It is uncertain however the extent to which countries are genuinely committed to the utilisation of the curricula and other tools developed by the project in their own future organisational development programmes. Whilst stakeholders indicate that such tools and practices are being and will continue to be integrated, realistically sustained uptake may be uneven across the sub-regions, linked to institutional and political will and resources.

While project effects relating to legislation, regulation, codes of conduct, standards and tools, and national anti-corruption policy and practices are not yet visible, several initiatives where project inputs are likely to be applied are clearly underway in nearly all countries; these also demonstrate a very high likelihood of sustainability. While such results cannot be unequivocally attributed to the project, they do reinforce the overall capacity of beneficiary countries to fight corruption, thus contributing to sustainability.

The field phase provided ample evidence that stakeholders are genuinely committed to sustaining the regional exchanges, partnerships, and cooperation mechanisms – and fuelled by strong personal relationships – that have all been developed by the project activities.

Summary – Sustainability

It is too early at the mid-term stage to develop a full assessment of sustainability. Sustainability was embedded in project design, and is implicit in the intended long-term impacts of the project.

Specific elements of sustainability include developing the capacities of the beneficiary institutions, supporting implementation of UNCAC (in particular at the legislative and policy level), and the provision of training and other tools.

Human Rights, Gender Equality and leaving no one behind

Evaluation questions:

- ➤ To what extent are human rights considerations sufficiently included in the project design and implementation?
- ➤ To what extent could gender equality considerations and related approaches (e.g. also drawing from previous pilot initiatives, etc.) be further included in the project design and implementation, in particular in the trainings and workshops carried out under this project?
- > To what extent were under-represented and vulnerable groups included in the project design and implementation?

Human Rights

A clear link exists between the exercise of human rights and the fight against corruption. The Human Rights Council recognised in Resolution 7/11 of 2008²⁴ that effective anti-corruption measures and the protection of human rights are mutually reinforcing. The Council's Resolution 29/11 of 2015 ("The negative impact of corruption on the enjoyment of human rights")²⁵ affirmed State parties' concerns about the negative impact of corruption on the enjoyment of human rights, and stressed that "...preventive measures are one of the most effective means of countering corruption and of avoiding its negative impact on the enjoyment of human rights" (para. 4); this invited the UN OHCHR and UNODC, to exchange views on deepen the understanding of the nexus between corruption and human rights²⁶.

UNODC, like all UN institutions, is committed to the promotion and protection of all human rights, including in terms of human rights-based programming and programme implementation. the 2012 Position Paper "UNODC and the Promotion and Protection of Human Rights" clearly sets out UNODC's responsibilities in this regard.

The link between the fight against corruption and human rights is however highly complex. Far from being a "crime without victim", corruption hampers the exercise of fundamental human rights, and may directly or indirectly lead to outright human rights violations such as torture, illegal detention or extra-judicial execution. Corruption has a deleterious impact on economic, social and cultural rights, and may worsen the situation of members of vulnerable groups (see below). Human rights defenders that attempt to counter corrupt interests or practices may be expressly targeted. At the same time, anti-corruption efforts must balance these considerations with the need to respect inter alia fair trial and due process rights.

The project was designed to support the implementation of UNCAC, which as a UN convention is consistent with international human rights standards but is not "rights-based" in the way its provisions are framed, however the 2012 Position Paper does indeed underline the importance of taking a rights-based approach to anti-corruption. The project itself clearly intended to contribute to promoting

²⁴ http://ap.ohchr.org/documents/e/hrc/resolutions/a hrc res 7 11.pdf

²⁵ https://documents-dds-ny.un.org/doc/UNDOC/LTD/G15/137/18/PDF/G1513718.pdf?OpenElement

²⁶ A/HRC/RES/29/11, para. 7

²⁷ https://www.unodc.org/documents/justice-and-prisonreform/UNODC Human rights position paper 2012.pdf

human rights "in line with the 2005 World Summit Outcome concerning the mainstreaming of human rights throughout the United Nations System, the resolutions of the Human Rights Council, and in full respect with the UNODC internal policies" (§70), noting that "effective anti-corruption measures and the protection of human rights are mutually reinforcing" (§75). At the level of impact, the project documents underlined that UNODC seeks to "strengthen the integrity and accountability of domestic institutions and improve the transparency and citizens' participation in government decision-making processes [to] advance the rights of individuals and groups" (§77).

The project aims to enhance integrity, accountability and transparency in the criminal justice system, promote fair trial rights and due process, and contribute to the prevention of torture (§78). Indeed, a basic tenet of the project design is to reinforce due process in all aspects of the prevention and prosecution of corruption in the target countries. This includes, for example, ensuring that anti-corruption laws, policy and practices are free from discrimination, and support transparency, accountability and other principles of the rule of law, themselves essential for the protection of human rights. Project documents also emphasise that "knowledge products will incorporate human rights issues to deepen the understanding between the nexus of human rights and anti-corruption, and will support and complement capacity-building activities" (§78). The inclusion of the judiciary and of civil society representatives among project partner institutions is an essential component of the project's likely contribution to human rights protection and the rule of law.

It is noted however that while human rights and a rights-based approach are referred to in project documents, in reality the project did not explicitly use this approach in framing its outcomes and outputs, nor are they highlighted in any progress and activity reports. It is considered that this is an element that requires some reflection and adjustment, even at this mid-point in project implementation, since rights-based approaches can be formulated and implemented at any stage of the project cycle. It would therefore be appropriate to make the rights-based dimension of the project strategy more explicit, in remaining project progress reports and in the formulation of a possible third phase.

Project outputs/ activities that are of most direct relevance to the exercise of human rights in the fight against corruption, and where consideration could be given to integrating or intensifying rights-based approaches include:

- Legal advice provision relative to UNCAC implementation;
- Needs assessments and stakeholder consultations in particular to ensure the inclusion civil society representatives;
- Legislative and policy drafting, and review and analysis of drafts; Development, review, and amendment of codes of conduct;
- Regional and national workshops, conference and other events;
- Development of training tools and curricula, and other capacity-building activities;
- Technical assistance relative to whistle-blower protection, access to information, and the integrity and accountability in the judiciary and prosecution;
- Awareness raising activities implicating the private sector;
- Identification of stakeholders for South-South cooperation.

Gender Equality

The project documents underscore the strong correlation between countries that have open societies and greater empowerment of women, and lower levels of corruption, stating "corruption has well known differential impacts on social groups and may have a disproportionately detrimental impact on women" (§70). As an organization, UNODC has identified gender as an issue cutting across all aspects of its programmes and activities both at headquarters and in the field. A guidance note for UNODC

staff entitled "Gender mainstreaming in the work of UNODC"²⁸ was developed and devotes special attention to anti-corruption programming. The guidance note recognizes the disproportionate impact of corruption on women in some societies and the role of corruption as a barrier to accessing public services and it requires from UNODC staff to address the gender considerations in anti-corruption interventions.

The project is accordingly explicitly committed to gender equality and "aims to integrate gender mainstreaming [...] into its activities" (§70), and aims to collect gender-disaggregated data on gender ratio during conferences and capacity-building activities, and implement awareness raising activities. Project documents intended to encourage the participation of women in activities through specific measures, including inter alia requesting lists of potential candidates for training events in the early planning stages, and ensuring gender is a criteria of participant selection processes. The project document also calls for developing training materials that include a "specific gender focus" (§73).

Some specific strategies for inclusion and awareness-raising were highlighted, such as selecting case examples that allow for a specific gender focus. The project also aimed to work on promoting and reinforcing regional gender-related norms and standards, such as the Asian and Pacific Ministerial Declaration on Advancing Gender Equality and Women's Empowerment^{29,} and also promote the effective participation of women in the implementation review process, building from a successful UNODC pilot with women's civil society groups.

It is accepted by the evaluators that it can be difficult to ensure a gender-neutral composition of participants in certain contexts, where there may exist an over-representation of one gender in upper civil service ranks, and in certain sectors, and while there have indeed been concerted efforts to collect data relative to gender, this does not appear to be assiduously tracked in terms of outputs/outcomes nor analysed in activity and other reports. Indeed, similar to human rights above, there exists a number of entry points for gender inclusion that could be strengthened at the substantive, and not just project-implementation, level – the categories where gender mainstreaming could be strengthened, and actively contribute to legislation, policy and practices in the target regions, mirror those provided at "human rights" above. The evaluators highlight in this respect the provisions of the UNODC Strategy for Gender Equality and the Empowerment of Women (2018-2021)³⁰ of March 2018, which, while developed after the project was designed, incorporates relevant performance areas on issues such as gender-related results reporting, including gender-sensitive indicators.

Leaving no one behind

Disadvantaged groups, vulnerable persons and under-represented persons suffer disproportionately from corruption. They are often more reliant on public services and public goods and have limited or no means to look for alternative private services. Disadvantaged sectors of society typically have fewer opportunities to participate meaningfully in the design and implementation of public policies and programmes. They often lack the resources and knowledge to seek redress and remedies. They may be victims of specific and multiple rights violations through corrupt practices. Vulnerable groups that may be particularly by corruption, and particularly in the target regions, include minorities (including victims

²⁸ http://www.un.org/womenwatch/directory/docs/UNODC-GuidanceNote-GenderMainstreaming.pdf

²⁹ https://www.unescap.org/sites/default/files/publications/B20%20Gender%20Equality%20Report%20v10-3-E.pdf

³⁰https://www.unodc.org/documents/Gender/UNOV-

UNODC_Strategy_for_Gender_Equality_and_the_Empowerment_of_Women_2018-2021_FINAL.pdf

of caste discrimination), migrants and displaced persons, children and youth, indigenous persons, indigent persons, rural populations, the disabled, detained persons, and victims of trafficking.

The project design did not refer to vulnerable or under-represented groups, nor include considerations on vulnerability in its design. It is considered that this is also an area where these considerations may be integrated in project implementation, and in future project design, again following the suggestions relative to human rights above.

Summary - Human Rights, Gender Equality and leaving no one behind

Human rights and gender equality are embedded in project design, and gender mainstreaming is implemented to some extent, however these could be considerably strengthened through greater integration in key project activities.

"Leaving no-one behind" is not addressed by the project, but there is considerable relevance in integrating these elements, even at this stage of the project; this could be feasibly integrated into activities along with human rights and gender issues.

III. CONCLUSIONS

The project design is sound in that it is clearly based on an intervention logic addressing the partner countries' commitments under UNCAC. The project appropriately focuses on common needs and demands identified through a participative needs assessment process. Nevertheless, the needs assessments have not always considered the need for reviewing the structure and manadate of anti-corruption institutions in the light of UNCAC.

The project design tends to focus more on capacity-building than on legal reviews and advice to partner countries on institutional development. The project is in line with UNODC strategies and the commitments of the target countries under UNCAC. The project is in practice prioritising activities in about ten of the 15 target countries

The project is relevant in that it is based on a sound analysis of the needs of each target country. The project also has a clear relevance to SDG 16, which addresses inclusiveness, justice and institutional accountability. The project's approach is appropriate to addressing identified needs, based on three outcomes. Nevertheless, the analysis and planned activities fail to sufficiently incorporate activities that target the private sector or non-government organisations. There is also an on-going need in many countries to address judicial bottlenecks that limit the effectiveness of the fight against corruption.

The project logframe is appropriately designed and provides a good reflection of the problem analysis. However its description of some outputs and indicator lacks precision. This hampers somewhat its usefulness as a project progress monitoring tool.

The project has been generally effective: activities have been implemented under each of the three planned outcomes, which are likely to contribute to the achievement of outcome-level indicators by the end of the project period, and in turn to the project's overall objective. The project has been implemented as planned, and has not encountered any substantive obstacles or delays.

The project's effectiveness is benefiting greatly from the skills and commitment of the project team members; the project management arrangement (team members based in a Regional Office, with management and administrative functions implemented from Headquarters) is a key factor in the effectiveness and efficiency of the project.

Factors contributing to the effectiveness of the project include its relevance and the quality of inputs and analysis, but there are constraints related to the lack of political will in some countries to address the fight against corruption. Advocacy on behalf of an anti-corruption agenda should be included in workplans during the remainder of the project and in any future projects.

Human rights and gender equality are embedded in project design, and gender mainstreaming is implemented to some extent, however these could be considerably strengthened through greater integration in key project activities.

"Leaving no-one behind" is not addressed by the project, but there is considerable relevance in integrating these elements, even at this stage of the project; this could be feasibly integrated into activities along with human rights and gender issues.

IV. RECOMMENDATIONS

As respondents consulted during the evaluation process generally gave positive feedback, the recommendations below aim at strengthening the project further. The following recommendations stem from the findings and conclusions; these recommendations are all addressed to the **project team, CEB, UNODC**:

Main recommendations

General on implementation

- 12. **Continued support to the fight against corruption.** As respondents consulted during the evaluation process generally gave positive feedback, the project team should continue providing input and technical advice to the target institutions, prioritising areas where UNODC has unique expertise and skills, or where long-term UNODC input is appropriate. Consideration should be given, in this or in a potential third project phase, to increasing the project team staffing level, if feasible, to be more commensurate to the tasks and needs of national stakeholders.
- 13. **Prioritisation of sub-regional activities.** The project team should consider, whenever possible, implementing more activities that bring together stakeholders at sub-regional level (e.g. groups of countries within South or Southeast Asia), where this can facilitate exchanges of experience and other synergies (for example if based on common legal systems).
- 14. Consideration should be given to further emphasising and making explicit the **rights-based approaches used in the project and activities**. This can include: legal advice; needs assessments and stakeholder consultations; legislative and policy drafting; codes of conduct; workshops, conference and other events; training tools and curricula; technical assistance; awareness raising; identification of stakeholders.

Mandate and structure of anti-corruption institutions

- 15. Consider reviewing the mandate and structures of the anti-corruption institutions. The project team should consider the extent to which it could support target countries in reinforcing the anti-corruption institutions' ability to carry out their functions effectively and without undue influence.
- 16. **Consider broader inclusion of judicial institutions.** The project team should consider reviewing the relationship between specialist anti-corruption agencies and the broader justice sector, and consider ways in which the broader judiciary could benefit from the project's activities.

Results monitoring

17. The project team is encouraged to further strengthen **monitoring** of the longer- and mid-term project results.

18. Gender issues should be monitored more closely relative to outputs and outcomes, and more strongly integrated in substantive outputs (see entry points at Recommendation 9, and also in line with the UNODC Strategy for Gender Equality and the Empowerment of Women (2018-2021).

Recommendations on a potential third phase

- 19. Needs assessments in a potential third phase should take account of the donor and economic context in which the anti-corruption institutions are operating, with a view in particular to encourage the institutions to seek additional bilateral funding to support their capacity development needs, whenever this is possible.
- 20. Add advice on surveys to the "knowledge" pillar of the project. Countries should be encouraged to use diagnosis techniques to better understand the extent and impact of corruption. The recently issued UNODC Manual on Corruption Surveys is a good basis for additional advice to countries on this aspect.
- 21. **Non-state actors**: the project team is encouraged to make further efforts in directly consulting or involving the private sector and civil society, especially in relation to assessing the extent and impact of corruption and in prevention activities.
- 22. Needs exist in areas that the project does not cover, or covers only partially. Given the scale of the project, the scope for adding further areas of support may be limited The project team should consider providing **additional support in specific areas** as part of the design of a potential third phase. This could include some of the following:
 - a. Further supporting the development of standard operating procedures;
 - b. Mentorship schemes;
 - c. Technical assistance on asset recovery, beneficial ownership and foreign bribery;
 - d. Corruption prevention;
 - e. Impact of decentralization on governance.

V. LESSONS LEARNED AND BEST PRACTICES

Evaluation questions:

- > To what extent did the project implement recommendations of relevant previous evaluation(s)?
- What are the main lessons learned and best practices from this first phase that should be replicated or scaled up in a potential next phase?

The project team was clearly aware of the recommendations of the evaluation of the previous phase, and recommendations from that process were explicitly guiding aspects of the development of the current phase, for example in relation to the formulation of the logframe indicators.

Project management

One key lesson to date concerns the quality of project management. This project is being very effectively managed – it is being implemented in accordance with the planned schedule and it also roughly on schedule in relation to spending:

- The only notable delays in implementation occurred early in the project because of the time needed to recruit staff and related administrative issues. This initial delay did not have a material impact on the implementation of the project beyond its very first months.
- Spending is reported to remain lower than originally planned, but this appears to be mainly
 related to conservative initial budgeting and exchange rate variations, not to activities being
 delayed or cancelled. There is no concern at this point that the project's planned activities will
 need reviewing because of budget constraint.

One important reason for the good quality of project management – beyond the commitment and expertise of the project team – is the fact that the team is positioned in two appropriate locations, where their skills and functions are complementary. The two staff members based at the Regional Office for Southeast Asia and the Pacific in Bangkok are in a good position to liaise with the institutions in the target countries, which they can do with minimal delay, being located in the correct time zone. The management, monitoring and reporting functions based at Headquarters in Vienna help ensure that the project is effectively plugged into the international agenda, that Vienna-based expertise is mobilised in a timely manner and that senior management is kept informed of developments in a timely manner. The team's easy access to administrative departments in Vienna also helps smooth out bureaucratic problems, thus avoiding unnecessary delays in matters such as payments, constraints related to the Umoja accounting system, etc. Past experience has shown that project teams that lack a Headquarter-based component are at greater risk of facing delays and other implementation or

reporting difficulties, as well as having less easy access to in-house expertise. It is therefore advisable to ensure that the Vienna/Bangkok management arrangement be maintained in a future project phase.

Sub-regional cooperation

Another valuable lesson from the project to date is the apparent usefulness of "sub-regional" meetings: participants in meetings of Mekong Basin countries on the one hand, from some South Asian countries on the other, have been appreciative of the usefulness to them of meetings in such format. This is understandable in that these meetings bring together representatives of agencies from countries that face (partly) similar corruption challenges and have largely similar legal frameworks and political systems. The meetings may also be relevant because some of the corrupt activities addressed by the participating countries have a similar sub-regional scope. The project team should therefore consider making more use of this format of meetings.

ANNEX I. TERMS OF REFERENCE OF THE EVALUATION

I. BACKGROUND AND CONTEXT

Project number:	GLOZ99
	The IPE is focused on a project funded by the Australian Department of Foreign Affairs and Trade (DFAT) under the overall umbrella of the Global Programme GLOZ99
Project title:	DFAT project: Asia-Pacific Joint Action Towards a Global Regime Against Corruption
Duration	DFAT project: 01/10/2016 – 30/09/2020 (4 years) GLOZ 99 01/10/2016 - 31/12/2020 (4 years, 3 months)
Location:	South and Southeast Asia
Linkages to Country, Regional and	Regional Programme for South Asia
Thematic Programmes:	Regional Programme for Southeast Asia
	Thematic Programme on Action against
	Corruption, Economic Fraud and Identity-Related Crime
	UNODC Strategic Framework Sub-programme 3 "Countering Corruption"
To which UNDAF ³¹ is the	N/A
project/programme linked to (if any)	
Executing Agency:	UNODC
Partner Organizations:	United Nations Development Programme (UNDP), Australian Department of Foreign Affairs and Trade (DFAT), the Indian Ocean Commission, the Association of South East Asian Nations (ASEAN), the Asia-Pacific Economic Cooperation (APEC), the ADB/OECD Anti-Corruption Initiative for Asia and the Pacific, the South Asia Association for Regional Cooperation (SAARC), South-East Asian Parties

³¹ United Nations Development Assistance Framework

	Against Corruption (SEA-PAC), American Bar Association (ABA).
Total Approved Budget:	DFAT project: AUD 7,470,000 (USD 5,636,372)
	(GLOZ99 Proposed Overall Budget USD 40,955,149)
Total Overall Budget	AUD 7,470,000
	(GLOZ99 Proposed Overall Budget USD 40,955,149)
Donors:	Australia
	(Other GLOZ 99 donors are Austria, Belgium, Brazil, Canada, China, EBRD, France, Germany, Great Britain, International Olympic Committee, Italy, Japan, Liechtenstein, Luxembourg, Mexico, Morocco, Norway, Panama, Qatar, Russian Federation, Saudi Arabia, Sweden, Switzerland, Turkey, UNDP, United States of America and World Bank)
Project Manager/ Coordinator:	Sebastian Baumeister (GLOZ99 Overall) and Constanze von Soehnen (DFAT Project Coordinator)
Type and time frame of evaluation:	Mid-term Independent Project Evaluation (IPE)
Time frame of the project covered by the evaluation:	01/10/2016 – 30/09/2018 (end of evaluation field missions)
Geographical coverage of the evaluation:	South and Southeast Asia. Approx. 5 countries to be visited during the IPE.
Budget for this evaluation in USD:	USD 65,000
Number of independent evaluators planned for this evaluation ³² :	2
Type and year of past evaluations (if any):	N/A (only during the first phase of the project/GLOX69)
Core Learning Partners ³³ (entities):	Corruption and Economic Crime Branch (CEB); Australian Department of Foreign Affairs and Trade DFAT; United Nations Development Programme (UNDP).

³² Please note that the minimum for any UNODC evaluation is two independent evaluators, i.e. one lead evaluator and one team member.

³³ The CLPs are the main stakeholders, i.e. a limited number of those deemed as particularly relevant to be involved throughout the evaluation process, i.e. in reviewing and commenting on the TOR and the evaluation questions, reviewing and commenting on the draft evaluation report, as well as facilitating the dissemination and application of the results and other follow-up action. Stakeholders include all those to be invited to participate in the interviews and surveys, including the CLPs.

Project overview and historical context

The mid-term Independent Project Evaluation (IPE or evaluation) will focus on the project "Asia-Pacific Joint Action Towards a Global Regime Against Corruption", which commenced in October 2016 and is funded by the Government of Australia, represented by the Department of Foreign Affairs and Trade (DFAT).

From 2012-2016 (phase 1), DFAT had funded the project "Joint Action towards a Global Regime against Corruption", which operated on a global level. The current project (phase 2) still supports and draws upon global-level knowledge products and exchange of experiences, but is geographically focused on South and Southeast Asia in terms of in-depth support. In addition, DFAT funds the joint UNDP-UNODC Pacific Regional Anti-Corruption (UN-PRAC) Project, which is aimed at addressing the specific challenges faced by Pacific Island countries and taps into synergies with the South and Southeast Asia project.

Both projects are implemented under the overall umbrella of the "Global Programme to prevent and combat corruption through effective implementation of United Nations Convention against Corruption in support of Sustainable Development Goal 16" (GLOZ99) of the Corruption and Economic Crime Branch (CEB) of UNODC.

The overall goal of the Asia-Pacific Joint Action Towards a Global Regime Against Corruption (subsequently "the project") is to contribute to preventing and combating corruption through effective implementation of the United Nations Convention against Corruption (UNCAC), in support of Sustainable Development Goal (SDG) 16, with a particular focus on the Asia-Pacific region.

Against this background, the project has **three specific objectives**: 1) to build the capacity of the States parties in the Asia-Pacific region to effectively implement UNCAC, 2) to provide support to States parties in the Asia-Pacific region, as well as to other stakeholders such as the private sector, to effectively coordinate their anti-corruption policies and efforts and to exchange experiences and best practices in fighting corruption, and 3) to develop knowledge tools to support the efforts of policy-makers, anti-corruption practitioners and other stakeholders to prevent and combat corruption.

The project seeks to achieve the following outcomes:

Outcome 1: Corruption is prevented and combated through effective implementation of UNCAC, with a particular focus on the Asia-Pacific region.

Outcome 2: Coordination of anti-corruption programmes, initiatives and projects at all levels (national, regional, global) and with a wide range of stakeholders is promoted.

Outcome 3: Knowledge on preventing and combating corruption is made available to policy-makers, practitioners and other stakeholders.

UNODC continues to seek opportunities to focus on gender issues during its work (e.g. when training investigators on questioning female witnesses or suspects) and co-organised a symposium on women fighting corruption in South and Southeast Asia. The event highlighted the need and appetite to further activities on gender and corruption, which will be followed up in late 2018 with a global event to collect ideas for programming. Human rights aspects are mainstreamed into the projects initiatives, for instance by consistently highlighting and discussing freedom of information as part of whistleblower protection training, due process and the rights of the accused as parts of investigative training (disciplinary and criminal) and relevant international human rights jurisprudence as guidance material.

Main challenges during implementation

The project is currently running as planned, but had a slightly slower starting period due to on-boarding of staff, including the recruitment and placement of the global anti-corruption adviser in January 2017 and the regional adviser for South Asia in May 2017. Since then the team was able to make good progress, capitalizing on strong networks of counterparts in both regions.

On the aspect of gender and corruption, the project will organise a global event in late 2018 to gather and discuss ideas for improved programming and mainstreaming of gender aspects into this and similar projects or activities focusing on the detection and investigation of corruption as well as on the prevention of corruption by increasing integrity, transparency, accountability and oversight.

Project documents and revisions of the original project document

	Year	Please provide general information regarding the original project document.	
Project document	2016	The project (sub-project of GLOZ99) was approved and signed by UNODC on 19 April 2016 and by DFAT on 20 April 2016. No project revisions took place since then.	

The overall GLOZ99 has been approved on 11 October 2016 and has had three revisions so far. The first, approved on 26 January 2017, related to budget, the second, approved on 8 May 2017, and the third, approved on 28 February 2018, related to staff positions.

Main objectives and outcomes

Objective of the project/programme (as per project document/revision):

Objectives:	1. Build the capacity of the States parties in the Asia-Pacific region to effectively implement UNCAC
	2. To provide support to States parties in the Asia-Pacific region, as well as to other stakeholders such as the private sector, to effectively coordinate their anti-corruption policies and efforts and to exchange experiences and best practices in fighting corruption
	3. Develop knowledge tools to support the efforts of policy-makers, anti- corruption practitioners and other stakeholders to prevent and combat corruption
Performance indicators:	No separate indicator at this level.

Outcomes of the project/programme (as per project document/revision)34

³⁴ Please delete or add rows below as needed for the different outcomes.

Outcome 1:	Corruption is prevented and combated through effective implementation of UNCAC, with a particular focus on the Asia-Pacific region.
Performance indicators:	 No. of legal provisions and policies in line with UNCAC on which CEB provided formal or informal written or verbal advice. (Baseline: 0 / Target 8) No. of institutions strengthened with CEB support in line with UNCAC and existing recognized best practices. (Baseline: 0 / Target 3) No. of adopted standards and tools that strengthen judicial integrity, accountability and transparency (Baseline: 0 / Target: 4) % of practitioners and other stakeholders, participating in UNODC capacity-building, who effectively apply in practice the capacities they acquired as a result of UNODC technical assistance (data collected will be disaggregated and analysed with regard to gender and persons with disabilities) (Baseline: 66% / Target: 66%)
Outcome 2:	Coordination of anti-corruption programmes, initiatives and projects at all levels (national, regional, global) and with a wide range of stakeholders is promoted.
Performance indicators:	- % of practitioners and other stakeholders, participating in UNODC capacity-building, who effectively apply in practice the capacities they acquired as a result of UNODC technical assistance (data collected will be disaggregated and analysed with regard to gender and persons with disabilities). (Baseline: 66% / Target: 66%)
	- No. of countries and key actors improving coordination at the national, regional and global level with CEB support. (Baseline: 0 / Target: 2)
Outcome 3:	Knowledge on preventing and combating corruption is made available to policy-makers, practitioners and other stakeholders.
Performance indicators:	 % of policy-makers, practitioners and other stakeholders who use the manuals and tools (data collected will be disaggregated and analysed with regard to gender and persons with disabilities). (Baseline: 0 / Target: 66%) No. of countries that have used the knowledge products to inform national policy development, capacity-building and anti-corruption reforms. (Baseline: 0 / Target: 40%)

In the first months of the project, baselines were established for the project outcomes and outputs. Numbers focus on services provided by CEB and actions taken by beneficiaries. Percentages draw on experiences from past projects and aim at keeping or further improving the quality and use of services, products and capacity building events. The target is to achieve positive feedback and a knowledge increase of 8 in 10 beneficiaries/participants (output level) and the application in practice of acquired skills and knowledge by 6-7 in 10 beneficiaries/participants (outcome level).

The objective of GLOZ 99 is "Corruption is prevented and combatted through effective implementation of UNCAC in support of SDG 16", which mirrors the outcome level of the project. To establish a concrete link between the global programme and implementation of relevant targets under SDG 16, in the 2030 Agenda, a composite indicator and corresponding means of verification will be developed for GLOZ99 in close consultation with the research branch and other key stakeholders. It should be noted that if the assessment of indicator requires a special data collection mechanism, funds will have to be sought separately for this exercise.

Contribution to UNODC's country, regional or thematic programme Contribution to the following UNODC country and regional programmes:

The project pursues a regional and global approach with some country level assistance. Consequently, the project ties in with the Regional Programmes that have been developed in both, Southeast Asia and South Asia. The regional programmes focus on regional, targeted and tailored support to States parties to prevent and combat crime, such as transnational organized crime, corruption and drug use and to support criminal justice reform. This is envisaged through a broad range of technical assistance measures with the objective of enhancing rule of law, peace, security, justice and health and of contributing to the achievement of SDG 16 and the 2030 Agenda.

- -Regional Programme for Southeast Asia35: This programme has been extended for two years and is currently still running (2014-2019).36
- -Regional Programme for South Asia: This programme, which had initially been planned for 2013-2015 was extended for 2 years (2013-2017). The new Regional Programme for South Asia (2018-2021) is in the last stages of being finalized. Operationalization will start during the second quarter of 2018.

Both regional programmes highlight that corruption is widely recognized as one of the main governance challenges in those regions and remains a significant obstacle to development in several countries. As all countries in South and Southeast Asia have ratified UNCAC and have started some legal and institutional reforms, the programmes point to the need to enhance capacity and skills and to address challenges in laws, regulations and procedures that would allow for more effective response mechanisms. In addition, regional and global exchange and the involvement of different actors is hoped to sustain or create political will to prevent and fight corruption.

Contribution to the following thematic programme(s):

The project also contributes to the UNODC Thematic Programme "Action against Corruption, Economic Fraud and Identity-Related Crimes".

Linkage to UNODC strategic framework, UNDAFs and to Sustainable Development Goals

With the 2030 Agenda for Sustainable Development, and its Goal SDG 16, rule of law, justice for all, strong institutions, and reducing corruption have become indispensable components of the collective agenda for sustainable and economic development.

The overall goal of the project is to contribute to preventing and combating corruption through the effective implementation of the United Nations Convention against Corruption (UNCAC), in support of Sustainable Development Goal 16, with a particular focus on the Asia-Pacific region.

³⁵ https://www.unodc.org/southeastasiaandpacific/en/what-we-do/index.html; https://www.unodc.org/documents/southeastasiaandpacific/Publications/2013/SEA_RP_masterversion_6_11_13.pdf

³⁶ https://www.unodc.org/southeastasiaandpacific/en/2017/07/regional-programme-extension/story.html

The Project contributes to the following Sustainable Development Goals, Targets and Performance Indicators:

Relevant UN Sustainable Development Goals ³⁷	Target(s)	Indicator(s)38
SDG 16: Promote Peaceful and Inclusive Societies for Sustainable Development, Provide Access to Justice for All and Build Effective, Accountable and Inclusive Institutions at All Levels.	16.5	16.5.1 16.5.2

Due to its regional design, the project does not focus on a targeted contribution to a particular UNDAF. However, under phase 1 of the project a joint UNODC-UNDP-UNSSC Training on the Integration of Anti-Corruption into UN Programming Processes (UNDAF) was developed. Under this project, UNODC still supports UN Country Teams upon request with capacity building events or comments on draft UNDAF documents and actively engages in dialogue with States parties and technical assistance providers. Further, the project team engages with relevant UN country teams to foster coordination and complementarity of assistance.

II. DISBURSEMENT HISTORY

Time periods throughout the <u>life</u> time of the project (10/2016-09/2020)	Total Approved Budget	Expenditure	Expenditure in %
10/2016 - 3/2018	7,470,000 AUD (5,636,371.54 USD)	1,588,208 USD	28.2 %
10/2016 - 12/2017	7,470,000 AUD (5,636,371.54 USD)	1,383,657 USD	24.5%

III. PURPOSE OF THE EVALUATION

At the request of the donor, and in line with the UNODC basic principles of project management, the Project Document provides for a mid-term and a final independent evaluation. For the delivery of the mid-term evaluation, the project document foresees the 31 October 2018 as date of delivery. Given

³⁷ All SDGs and targets can be found here: http://www.un.org/sustainabledevelopment/sustainabledevelopment-goals/

https://unstats.un.org/sdgs/indicators/Global%20Indicator%20Framework_A.RES.71.313%20Annex.pdf

the summer holiday period, it was discussed with DFAT that some interviews might be difficult to schedule during July and August and that therefore a shift of one month would be required.

The evaluation will be formative in nature and focus on the following aspects: an assessment of successes, including inter alia, measures for replication, up-scaling, or prioritization, as well as areas for improvement, including concrete proposals for consideration in the subsequent implementation of the project. This assessment should generate recommendations for immediate action that could be used for the second half of the project. Additionally, more holistic, visionary and forward-looking recommendations that could be used for the more long-term planning and programming processes (e.g. potential third phase) should be generated. Furthermore, in line with the formative nature, the evaluation will focus on reviewing and providing recommendations on the design and theory of change.

The mid-term evaluation of the overall Global Programme GLOZ 99 is scheduled a bit later, starting in fall with an estimated date of completion in April 2019. This date would be too late for the DFAT funded component. CEB will assure that the overall GLOZ99 evaluation will draw and build upon this evaluation and its recommendations.

The main users of the evaluation will be the CEB Management and the project team, as well as DFAT, the project donor.

The following DAC criteria will be assessed during the evaluation: relevance, efficiency, effectiveness, (expected) impact and sustainability. In addition, design, established partnerships and cooperation as well as aspects of human rights and gender mainstreaming will be assessed. The evaluation will specifically assess how gender aspects have been mainstreamed into the project. Furthermore, lessons learned and best practices will be identified and recommendations based on the findings formulated.

IV. SCOPE OF THE EVALUATION

Unit of analysis	The evaluation will focus exclusively on the DFAT Project and its activities. (project under the umbrella of the Global programme GLOZ99)	
Time period of the project covered by the evaluation	The time period to be covered will be from the start of the Project 09/2016 until the end of the field missions in 09/2018.	
Geographical coverage of the evaluation	South and Southeast Asia. Approx. 2 countries per sub-region should be visited.	

V. KEY EVALUATION QUESTIONS

Evaluation Criteria

The evaluation will be conducted based on the following DAC criteria: relevance, efficiency, effectiveness, impact and sustainability, as well as design, partnerships and cooperation, human rights, gender equality and leaving no one behind as well as lesson learned and best practices. The questions will be further refined by the Evaluation Team.

Docian
Design

The Design of a project or programme measures the extent to which the logical framework approach was adopted.

- 1. To what extent has the log-frame been a useful programme management tool and to what extent is the intervention logic, including performance indicators, developed to enable measuring this projects' potential contribution to outcomes and impact?
- 2. Is there a need for more prioritization or focus on specific areas considering the aim to coordinate the implementation with activities of other projects and optimal use of limited resources?
- 3. To what extent has this project been designed to support the overall objective of GLOZ99 and to what extent have recommendations of previous related evaluations been considered during the design phase?

Relevance

Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient and donor.

- 4. To what extent are the outputs, outcomes and objectives of the project relevant to the anti-corruption needs and priorities of the governments in South and Southeast Asia, including from a broader socio-political and economic perspective?
- 5. To what extent should the project generate additional corruption related knowledge products to ensure meeting the needs of recipients?

Efficiency

Efficiency measures the outputs - qualitative and quantitative - in relation to the inputs.

- 6. To what extent have the financial and human resources (inputs) been converted to outputs in a timely and cost-effective manner (in particular considering country-, regional-and global approaches for assessments and assistance)?
- 7. To what extent has the project been catalytic towards the implementation of other projects or initiatives?

Effectiveness

Effectiveness is a measure of the extent to which an aid activity attains its objectives.

- 8. What are the main achievements of the project so far and to what extent are planned outputs and in particular outcomes achieved/on the way of being achieved?
- 9. Which good practices could be identified for replication (e.g. in other projects or on other topics), up-scaling, intensification or prioritization to ensure to achieve outcomes and objectives in the most effective way?

Expected Impact

Impact is the positive and negative changes produced by a development intervention, directly or indirectly, intended or unintended.

- 10. To what extent has the project successfully promoted peer-learning and knowledge exchange and how could this contribute to expected impact?
- 11. Were any secondary benefits or unexpected impacts achieved beyond those included in the logical framework? If so, what were those?
- 12. To what extent is the project contributing/likely to contribute to supporting the implementation of the SDGs and to counter corruption in the recipient governments?

Sustainability

Sustainability is concerned with measuring whether the benefits of an activity are likely to continue after donor funding has been withdrawn.

- 13. Does the project create the possibility, including systems and structures, for the project results to continue after the end of the project? And to what extent can the project contribute to sustainability of anti-corruption efforts in the recipient governments?
- 14. Considering the regional design of the project (in contrast to country-level projects), in which way could the project further strengthen sustainability of its results?

Partnerships and cooperation

The evaluation assesses the partnerships and cooperation established during the project/ programme as well as their functioning and value.

15. To what extent is the project/programme cooperating with other potential partners (including UN agencies, CSOs, academia, etc.) to achieve its objective and the achievement of the SDGs?

Human rights, gender equality, and leaving no one behind

The evaluation needs to assess the mainstreaming throughout the project/programme of human rights, gender equality, and the dignity of individuals, i.e. vulnerable groups.

Human Rights

16. To what extent are human rights considerations sufficiently included in the project design and implementation?

Gender Equality

17. To what extent could gender equality considerations and related approaches (e.g. also drawing from previous pilot initiatives, etc.) be further included in the project design and implementation, in particular in the trainings and workshops carried out under this project?

Leaving no one behind (optional)

18. To what extent were under-represented and vulnerable groups included in the project design and implementation?

Lessons learned and best practices

Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.

- 19. To what extent did the project implement recommendations of relevant previous evaluation(s)?
- 20. What are the main lessons learned and best practices from this first phase that should be replicated or scaled up in a potential next phase?

VI. EVALUATION METHODOLOGY

The methods used to collect and analyse data

This evaluation will use methodologies and techniques as determined by the specific needs for information, the questions set out in the TOR and the availability of stakeholders. In all cases, the evaluation team is expected to analyse all relevant information sources, such as annual project reports, other programme documents and files, the two regional programmes (South and Southeast Asia) and thematic programme, financial reports and any other documents that may provide further evidence for triangulation, on which their conclusions will be based.

The evaluation team is also expected to use interviews, surveys or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation. While maintaining independence, the evaluation will be carried out based on a participatory approach, which seeks the views and assessments of all parties identified as the key stakeholders of the project, the Core Learning Partners (CLP).

The project focuses on six countries in South Asia39 and nine countries in Southeast Asia.40 The evaluation should conduct field missions for data collection (including interviews and/or focus group

³⁹ Bangladesh, Bhutan, India, Maldives, Nepal and Sri Lanka

⁴⁰ Cambodia, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Philippines, Thailand, Timor-Leste and Vietnam. Other countries in the region which are not covered as main beneficiaries of this project are Brunei Darussalam, China, Mauritius, Mongolia and Seychelles.

discussions) in four countries in South and Southeast Asia. Further countries and partners can be contacted during the mission to Vienna, which will be scheduled in the same week as the resumed session of the Implementation Review Group and the Working Group on Prevention. Moreover, other means of communication can be used a, depending on the evaluation methodology (e.g. questionnaires, skype interviews). Whilst the final selection of countries will be discussed and agreed upon with the evaluation team, the project team would like to submit the following proposal, as basis for discussion and consideration: For South Asia, two of the following - Sri Lanka, Bangladesh or Bhutan – for Southeast Asia, two of the following - Cambodia, Indonesia or Vietnam.

The present ToR provide basic information as regards to the methodology, which should not be understood as exhaustive. It is rather meant to guide the evaluation team in elaborating an effective, efficient, and appropriate evaluation methodology that should be proposed, explained and justified in the Inception Report.

In addition, the evaluation team will be asked to present a summarized methodology (including an evaluation matrix) in the Inception Report outlining the evaluation criteria, indicators, sources of information and methods of data collection. The evaluation methodology must conform to the United Nations Evaluation Group (UNEG) Norms and Standards as well as the UNODC Evaluation Policy, Norms and Standards.

While the evaluation team shall fine-tune the methodology for the evaluation in an Inception Report, a mixed-methods approach of qualitative and quantitative methods is mandatory due to its appropriateness to ensure a gender-sensitive, inclusive methodology. Special attention shall be paid to an unbiased and objective approach and the triangulation of sources, methods, data, and theories. Indeed, information stemming from secondary sources will be cross-checked and triangulated through data retrieved from primary research methods. Primary data collection methods need to be gender-sensitive as well as inclusive.

The credibility of the data collection and analysis are key to the evaluation. Rival theories and competing explanations must be tested once plausible patterns emerge from triangulating data.

The limitations to the evaluation need to be identified and discussed by the evaluation team in the Inception Report, e.g. data constraints (such as missing baseline and monitoring data). Potential limitations as well as the chosen mitigating measures should be discussed.

When designing the evaluation data collection tools and instruments, the evaluation team needs to consider the analysis of certain relevant or innovative topics in the form of short case studies, analyses, etc. that would benefit the evaluation results.

The main elements of the evaluation process are the following:

- Preliminary desk review of all relevant project documentation, (Annex II of the evaluation ToR), as provided by the Project Coordinator and as further requested by the evaluation team, as well as relevant external documents (e.g. UNDAFs; SDGs; UN and global/regional strategies; etc.);
- Preparation and submission of an Inception Report (containing preliminary findings of the
 desk review, refined evaluation questions, data collection instruments, sampling strategy,
 limitations to the evaluation, and timetable) to IES for review and clearance before any field
 mission may take place;
- Initial meetings and interviews with the Project Coordinator, the Global Anti-Corruption Advisor, the Chief of the CEB Implementation Support Section and other UNODC staff as well as stakeholders during the field mission;

- Interviews (face-to-face or by telephone/skype), with key project stakeholders and beneficiaries, both individually and (as appropriate) in small groups/focus groups, as well as using surveys, questionnaires or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation;
- Analysis of all available information;
- Preparation of the draft evaluation report (based on Guidelines for Evaluation Report and Template Report to be found on the IEU website http://www.unodc.org/unodc/en/evaluation/index.html). The lead evaluator submits the draft report to the Project Manager for the review of factual errors (copying IEU) and the Project Manager shares with IEU for review, comments and clearance. Subsequently the Project Coordinator shares the revised draft report with all CLPs for comments.
- Preparation of the final evaluation report and an Evaluation Brief (2-pager). The evaluation team incorporates the necessary and requested changes and finalizes the evaluation report in accordance with the feedback received from IEU, the Project Coordinator and CLPs. It further includes a PowerPoint presentation on final evaluation findings and recommendations;
- Presentation of final evaluation report with its findings and recommendations to the target audience, stakeholders etc. (in person or if necessary through Skype).
- In conducting the evaluation, the UNODC and the UNEG Evaluation Norms and Standards are to be taken into account. All tools, norms and templates to be mandatorily used in the evaluation process can be found on the IEU website: http://www.unodc.org/unodc/en/evaluation/index.html.

The sources of data

The evaluation will utilize a mixture of primary and secondary sources of data. The primary sources include, among others, interviews with key stakeholders (face-to-face or by telephone), the use of surveys and questionnaires, field missions for case studies, focus group interviews, observation and other participatory techniques. Secondary data sources will include project documents and their revisions, progress and monitoring reports, external reports and strategies (e.g. UNDAFs; SDGs; country/regional/global strategies; etc.) and all other relevant documents, including visual information (e.g. eLearning, pictures, videos, etc.).

Desk Review

The evaluation team will perform a desk review of all existing documentation (please see the preliminary list of documents to be consulted in Annex II of the evaluation ToR). This list is however not to be regarded as exhaustive as additional documentation may be requested by the evaluation team. The evaluation team needs to ensure that sufficient external documentation is used for the desk review.

Phone interviews / face-to-face consultations

The evaluation team will conduct phone interviews / face-to-face consultations with identified individuals from the following groups of stakeholders:

- Member States (including recipients and donors);
- relevant international and regional organizations;
- Non-governmental organizations working with UNODC;
- UNODC management and staff at HQ and in the field;
- Etc.

Questionnaire

A questionnaire (on-line) is to be developed and used in order to help collect the views of additional stakeholders (e.g. trainees, counterparts, partners, etc.), if deemed appropriate.

VII. TIMEFRAME AND DELIVERABLES

Duties	Time frame	Location	Deliverables
Desk review and drafting of Inception Report	04/06/2018 – 19/06/2018 (11 working days for lead evaluator and 9 for team member)	Home base	Draft Inception report in line with UNODC evaluation norms and standards ⁴¹
Review of draft Inception Report by IEU	20/06/2018 – 27/06/2018 (1 week for IEU review)		Comments on the draft Inception Report to the evaluation team
Incorporation of comments from IEU (can entail various rounds of comments from IEU)	28/06/2018 – 09/07/2018 (3 w/d for lead evaluator and 2 for team member) (+1 week for IEU review)	Home base	Revised draft Inception Report
Deliverable A: Final Inception Report in line with UNODC evaluation norms, standards, guidelines and templates	By 10/07/2018 (overall 14 w/d for lead evaluator and 11 for team member)		Final Inception report to be cleared by IEU at least one week before the field mission can get started
Evaluation mission: briefing, interviews with staff at UNODC HQ/FO (including by phone/skype); observation; focus groups; presentation of preliminary observations (if applicable)	4 missions in total to countries in SA and SEA are planned in the belowmentioned time and a mission to Vienna. The evaluators will conduct at least one mission per region jointly. 17/07/2018 – 11/09/2018 (14 w/d for lead evaluator and 14	Countries/Citie s (tbd.) UNODC/HQ 03/09/2018-06/09/2018	Interviews and data collection

⁴¹ https://www.unodc.org/unodc/en/evaluation/normative-tools.html#Inception_Report

	/1 C		I
	w/d for team		
Drafting of the draft evaluation report; submission to Project Management and IEU; Deliverable B: First draft Evaluation Report in line with UNODC evaluation	w/d for team member) August — 20/09/2018 (12 w/d for lead evaluator and 10 for team member) Drafting would start during the weeks scheduled for the missions. By 20/09/2018 (overall 26 w/d for lead	Home base	Draft evaluation report
norms, standards, guidelines and templates	evaluator and 24 for team member)		
Review of IEU for quality assurance and Project Coordinator for factual errors	21/09/2018 – 05/10/2018 (2 weeks for review)		Comments on the draft evaluation report to the evaluation team
Consideration of comments from the project coordinator and incorporation of comments from IEU (can entail various rounds of comments from IEU)	08/10/2018 – 22/10/2018 (6 w/d for lead evaluator and 4 for team member) (+ 1 week for IEU review)	Home base	Revised draft evaluation report
Deliverable C: Revised Draft Evaluation Report	By 23/10/2018 (overall 6 w/d for lead evaluator and 4 for team member)		Revised draft evaluation report, to be cleared by IEU
IEU to share draft evaluation report with Core Learning Partners for comments	24/10/2018 – 07/11/2018 (2 weeks)		Comments of CLPs on the draft report
Consideration of comments from Core Learning Partners and preparation of draft Evaluation Brief	08/11/2018 – 12/11/2018 (3 w/d for lead evaluator and 1 for team member)	Home base	Revised draft evaluation report

Final review by IEU; incorporation of comments and finalization of report and Evaluation Brief (can entail various rounds of comments from IEU)	13/11/2018 – 23/11/2018 (3 w/d for lead evaluator and 2 for team member) (+ 1 week for IEU review)	Home base	Revised draft evaluation report; draft Evaluation Brief
Presentation of evaluation results (to be reviewed and cleared by IEU)	Tentative: 28/11/2018 (1 w/d for lead evaluator)		Presentation of evaluation results
Deliverable D: Final evaluation report; presentation of evaluation results; Evaluation Brief (2-pager)	By 28/11/2018 (overall 7 w/d for lead evaluator and 3 for team member)		Final evaluation report; Evaluation Brief and presentation of evaluation results, both to be cleared by IEU
Project Management: Finalise Evaluation Follow- up Plan in ProFi	By 11/01/2019		Final Evaluation Follow-up Plan to be cleared by IEU
Project Management: Disseminate final evaluation report	By 30/11/2018		Final evaluation report disseminated to internal and external stakeholders
IEU: facilitate the external Evaluation Quality Assessment of the Final Report	1st quarter 2019		

The UNODC Independent Evaluation Unit may change the evaluation process, timeline, approach, etc. as necessary at any point throughout the evaluation-process.

VIII. EVALUATION TEAM COMPOSITION

The evaluation team will report exclusively to the Chief or Deputy Chief of the UNODC Independent Evaluation Unit.

Role	Number of consultants/	Specific expertise required43	
	evaluators42		
	(national/international)		
Team leader	1 (international consultant)	Evaluation methodology. Expertise is	
		Gender Equality and Human Rights.	
		Additional expertise in the area of	
		prevention and fighting corruption or	
		similar area, is considered an asset.	
Team	1 (international consultant)	Anti-Corruption expert.	
member		Expertise in Gender Equality and	
		Human Rights, is considered an asset.	

The evaluators will not act as representatives of any party and must remain independent and impartial. The qualifications and responsibilities for each evaluator are specified in the respective job descriptions attached to these Terms of Reference (Annex 1). The evaluation team will report exclusively to the chief or deputy chief of the UNODC Independent Evaluation Unit, who are the exclusive clearing entity for all evaluation deliverables and products.

Absence of Conflict of Interest

According to UNODC rules, the evaluators must not have been involved in the design and/or implementation, supervision and coordination of and/or have benefited from the programme/project or theme under evaluation.

Furthermore, the evaluators shall respect and follow the UNEG Ethical Guidelines for conducting evaluations in a sensitive and ethical manner.

IX. MANAGEMENT OF THE EVALUATION PROCESS

Roles and responsibilities of the Project Coordinator

The Project Coordinator is responsible for:

- Managing the evaluation process (administrative and financial processes),
- drafting and finalizing the ToR,
- selecting Core Learning Partners, in consultation with the regional advisors (representing a balance of men, women and other marginalised groups) and informing them of their role,
- recruiting the evaluation team following clearance by IEU, ensuring issued contracts ahead of
 the start of the evaluation process in line with the cleared ToR. In case of any delay, IEU and
 the evaluation team are to be immediately notified,
- providing desk review materials (including data and information on men, women and other marginalised groups) to the evaluation team including the full TOR,
- liaising with the Core Learning Partners,
- reviewing the draft report for factual errors only,

⁴² Please note that an evaluation team needs to consist of at least 2 independent evaluators – at least one team leader and one team member.

⁴³ Please add the specific technical expertise needed (e.g. expertise in anti-corruption; counter terrorism; etc.) – please note that at least one evaluation team member needs to have expertise in human rights and gender equality.

- developing a follow-up plan for the usage of the evaluation results and recording of the implementation of the evaluation recommendations (to be updated once per year),
- disseminate the final evaluation report and communicate evaluation results to relevant stakeholders as well as facilitate the presentation of evaluation results;
- ensure that all payments related to the evaluation are fulfilled within 5 working days after IEU's request - non-compliance by Project/Programme Management may results in the decision to discontinue the evaluation by IEU.

The Project Coordinator, in coordination and with support of the regional advisors for South and Southeast Asia for their respective region, will be in charge of **providing logistical support** to the evaluation team including arranging the field missions of the evaluation team, including but not limited to:

- All logistical arrangements for the travel (including travel details; DSA-payments; transportation; etc.)
- All logistical arrangement for the meetings/interviews/focus groups/etc., ensuring interview
 partners adequately represent men, women and other marginalised groups (including
 independent translator/interpreter if needed); set-up of interview schedules; arrangement of
 ad-hoc meetings as requested by the evaluation team; transportation from/to the interview
 venues; scheduling sufficient time for the interviews (around 45 minutes); ensuring that
 members of the evaluation team and the respective interviewees are present during the
 interviews; etc.)
- All logistical arrangements for the presentation of the evaluation results;
- Ensure timely payment of all fees/DSA/etc. (payments for the evaluation team must be released within 5 working days after the respective deliverable is cleared by IEU).

Roles and responsibilities of the evaluation stakeholders

Members of the Core Learning Partnership (CLP) are identified by the project managers/coordinators. The CLPs are the main stakeholders, i.e. a limited number of those deemed as particularly relevant to be involved throughout the evaluation process, i.e. in reviewing and commenting on the TOR and the evaluation questions, reviewing and commenting on the draft evaluation report, as well as facilitating the dissemination and application of the results and other follow-up action. Stakeholders include all those to be invited to participate in the interviews and surveys, including the CLPs.

Roles and responsibilities of the Independent Evaluation Unit

The Independent Evaluation Unit (IEU) provides mandatory normative tools, guidelines and templates to be used in the evaluation process. Please find the respective tools on the IEU web site http://www.unodc.org/unodc/en/evaluation/evaluation.html.

Furthermore, IEU provides guidance, quality assurance and evaluation expertise, as well as interacts with the project manager and the evaluation team throughout the evaluation process. IEU may change the evaluation process, timeline, approach, etc. as necessary at any point throughout the evaluation-process.

IEU reviews, comments on and clears all steps and deliverables during the evaluation process: Terms of Reference; Selection of the evaluation team, Inception Report; Draft Evaluation Report; Final Evaluation Report and an Evaluation Brief; Evaluation Follow-up Plan. IEU further publishes the final evaluation report and the Evaluation Brief on the UNODC website, as well as sends the final evaluation report to an external evaluation quality assurance provider. Moreover, IEU may decide, in consultation with Project Management, to upgrade any Independent Project Evaluation to an In-Depth Evaluation considering e.g. an unforeseen higher involvement of IEU staff in the evaluation process.

X. PAYMENT MODALITIES

The evaluation team will be issued consultancy contracts and paid in accordance with UNODC rules and regulations. The contracts are legally binding documents in which the evaluation team agrees to complete the deliverables by the set deadlines. Payment is correlated to deliverables and three instalments are typically foreseen:

- 1. The first payment upon clearance of the Inception Report (in line with UNODC evaluation norms, standards, guidelines and templates) by IEU;
- 2. The second payment upon clearance of the Draft Evaluation Report (in line with UNODC norms, standards, evaluation guidelines and templates) by IEU;
- 3. The third and final payment (i.e. the remainder of the fee) only after completion of the respective tasks, receipt of the final report, Evaluation Brief (in line with UNODC evaluation norms, standards, guidelines and templates) and clearance by IEU, as well as presentation of final evaluation findings and recommendations.

75 percent of the daily subsistence allowance and terminals is paid in advance before travelling. The balance is paid after the travel has taken place, upon presentation of boarding passes and the completed travel claim forms.

IEU is the sole entity to request payments to be released in relation to evaluation. Project/Programme Management must fulfil any such request within 5 working days to ensure the independence of this evaluation-process. Non-compliance by Project/Programme Management may result in the decision to discontinue the evaluation by IEU.

ANNEX II. EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES

Interview guide

The table below summarises the questions that will be raised by the evaluators in the context of semistructured interviews. The questions will be formulated so as to help address each of the judgement criteria listed in the Evaluation Matrix. In essence, the following groups of people will be targeted for interview using this guide:

- Personnel of institutions targeted by the project;
- Staff of UNODC and other UN agencies (UNDP especially) who have worked or contributed to the project;
- Experts who contributed to project activities (e.g. trainers, consultants involved in the development of training materials, etc.);
- Representatives of other partner organisations (donors, IGOs, diplomats) with knowledge of the project, or who work in a similar area;
- Independent observers (NGO members, academics, journalists, etc.) who may not know the
 project but may be able to talk about the situation of the fight against corruption more
 generally, or the situation of the anti-corruption institutions in their country.

No single informant is expected to be able to respond to all the questions in the present guide. The evaluators will adapt the questions to the specific circumstances of individual informants.

The questions in the table below are designed on the assumption that most of the stakeholders interviewed will be senior officials at institutions targeted by the project (such as anti-corruption commissions, ministries of justice, courts, prosecutors' offices, etc.). A limited number of questions, marked with an asterisk (*) are aimed at UNODC staff and others (such as consultants and other outside experts) who were involved in the design of the project, or who are aware of its management processes.

Introduction		

In line with UNODC Evaluation Policy and Norms and Standards, the external independent evaluation team (introduce each evaluator) has been hired to conduct a mid-term evaluation of the Global Programme segment Asia-Pacific Joint Action Towards a Global Regime against Corruption (2016-2010) GLOZ99.

Evaluator summarise the objectives of the mid-term evaluation, noting that he TOR require the MTE to assess successes, including inter alia, measures for replication, up-scaling, or prioritization, as well as areas for improvement, including concrete proposals for consideration in the subsequent implementation of the project; it should generate recommendations for immediate action to be carried out during the second half of the project period, as well as more holistic, visionary and forward-looking longer-term recommendations that could be taken into account in further programming, including for a potential third phase of the global programme.

The evaluator further states that the interviewee's comments will be kept confidential. Only summaries and non-attributable assessments will be presented in the evaluation report

Design

Were you (was your organisation) involved in discussion of the project prior to design being finalised in 2015/2016?

Did the project design take into account your country's anti-corruption policies at the time of its design?

Was the project designed to help upgrade the skills and knowledge of the institutions involved in the fight against corruption?

* Were the project strategy and design consistent with UNODC priorities at national and regional levels?

Relevance

In your understanding of the project, was its strategy based on a sound analysis of the political and socio-economic strengths and weaknesses of the target countries?

* Did the project strategy take into account the institutional development, mandate and capacities of the beneficiary institutions, as well as their needs in terms of capacity building, organisational development and mandate?

Effectiveness

Does the project help strengthen anti-corruption investigation and prosecution? If so, could you please give an example?

Does the project help enhance institutional and operational capacity of the beneficiary institutions, and improve inter-agency cooperation? Example?

Are the organisation and implementation of project activities such that they amounted to tangible support to the target country's governments in anti-corruption response? Example?

Is there evidence of enhanced inter-agency coordination, improved research capacity, and strengthened legal drafting among partner organisations? Example?

Is there evidence of improved institutional development strategies, enhanced response capabilities, law enforcement and intelligence/investigation capabilities, among partner organisations? Example?

Does the project, as implemented, help beneficiaries to address their needs in relation to the fight against corruption? Example?

Is the project's effectiveness enhanced by sound intervention logic, underpinned by appropriate performance indicators? Example?

* Is the project's effectiveness underpinned by a sound political economy analysis and by an appropriate analysis of risks and mitigation strategies? Example?

Efficiency

- * Does the project make good use of the expertise available to UNODC, particularly with regard to research and training, and does it take into account lessons learned and good practices developed by other UNODC projects in similar domains?
- * Is the project team able to manage the project in such a way as to ensure the timely delivery of planned outputs and activities?

Do institutional arrangements help ensure that project management mechanisms put in place by UNODC are appropriate to deliver management that is timely, flexible and accountable?

- * Is the budget designed and implemented in a way that enabled it to meet its objectives?
- * Is there was a reasonable relationship between project inputs and outputs?
- * Do institutional arrangements promote effective project management and accountability, including through appropriate monitoring and evaluation processes?

Impact

Do the project activities and outputs improve policy-making and practices in relation to anti-corruption efforts?

Do the project activities and outputs enhance coordination among institutions at working/expert level?

Does the project contribute to changes in the approach that the Government and other stakeholders take to the fight against corruption?

Does the project contribute to changed attitudes on the fight against terrorism on the part of officials, particularly in relation to human rights and gender equality?

Sustainability

* Does the project design include an exit strategy that identifies processes and approaches to foster a continued impetus towards continuing the fight against corruption?

Are the stakeholders in the project willing and able to follow up on project activities, where applicable?

Are the policies, methodologies and political approaches developed during the project period likely to be continued beyond the end of the project?

Do the training and other capacity building activities help ensure that the beneficiary institutions maintain and develop their activities and continue to enhance coordination and cooperation with each other?

Human Rights and Gender Equality

Are principles such as transparency, accountability, and equality before the law, non-discrimination and participation taken into account in training activities and advice?

Does the project contribute to mitigating the gender impact of corruption?

Does the project encourage the partners to adopt more gender-responsive approaches in their respective field of work?

UNODC added value/partnerships

* To what extent is UNODC able to take advantage of its unique position and comparative advantage to achieve results that could not be achieved with support from other donors?

Is UNODC able to achieve results that alternative implementers would find more difficult to achieve?

* Does the project design make good use of UNODC's status as an international, impartial actor?

ANNEX III. DESK REVIEW LIST

Overall number of documents reviewed:

General UNODC and other UN documents

1	Terms of Reference of the Independent Project Evaluation
2	UN Strategic Framework / Biennial Programme plan and priorities for the period 2018-2019 – Programme 13, Sub-Programme 3 "Countering Corruption";
3	Regional Programme for Southeast Asia (2014-2019);
4	Regional Programme for South Asia (2013-2017) and (2018-2021);
5	UNODC website: UNODC and the Sustainable Development Goals44
6	UNODC Position Paper on Human Rights (2011)45
7	Guidance Note on Gender Mainstreaming in UNODC (2013)46
8	UNEG: Integrating human rights and gender equality in evaluation47
9	UNODC Independent Evaluation Unit: Meta-Analysis 2015-201648
10	UNODC Independent Evaluation Unit: Evaluation-based analysis of good practices in UNODC's approach to capacity building49
11	UNODC brochure: Better Data to monitor violence, trafficking, corruption and access to Justice (2017)50
12	UNODC evaluation guidelines, templates, handbook, policy51
13	UNODC Inception Report Guidelines and Template52

reform/UNODC_Human_rights_position_paper_2012.pdf

statistics/Brochure goal16 2017 web.pdf

⁴⁴ https://www.unodc.org/unodc/en/about-unodc/sustainable-development-goals/sdgs-index.html

⁴⁵ http://www.unodc.org/documents/justice-and-prison-

⁴⁶ http://www.un.org/womenwatch/directory/docs/UNODC-GuidanceNote-GenderMainstreaming.pdf

⁴⁷ http://www.uneval.rgdetail/980

^{48 &}lt;a href="http://www.unodc.org/documents/evaluation/Meta-Analysis/UNODC">http://www.unodc.org/documents/evaluation/Meta-Analysis/UNODC IEU Evaluation Meta-Analysis 2015-2016.pdf

^{49 &}lt;a href="http://www.unodc.org/documents/evaluation/Knowledge-Products/UNODC_IEU_Evaluation-based_Capacity_Building_Analysis_final_October_2017.pdf">http://www.unodc.org/documents/evaluation/Knowledge-Products/UNODC_IEU_Evaluation-based_Capacity_Building_Analysis_final_October_2017.pdf

⁵⁰ http://www.unodc.org/documents/data-and-analysis/Crime-

⁵¹ http://www.unodc.org/unodc/en/evaluation/normative-tools.html

⁵² https://www.unodc.org/unodc/en/evaluation/normative-tools.html#Inception Report

14	UNODC Evaluation Report Guidelines and Template53
15	UNODC Evaluation Quality Assessment54
16	UNEG Norms and Standards for Evaluation (2016) ⁵⁵
17	UNEG Ethical Guidelines for Evaluation ⁵⁶
18	United Nations Development Assistance Framework Guidance (2017)57

Project related documents

1	GLOZ99 Global Programme Document (October 2016), including Log Frame
2	UNODC/CEB Theory of Change
3	Project document of the DFAT Sub-component for South and Southeast Asia, including project logframe and internal monitoring database/sheets
4	Annual Progress reports (Oct-Dec 2016; Jan-Dec 2017) including annexes e.g. beneficiaries count
5	Project evaluation of the first phase of the project: GLOX69 Mid-term Evaluation Report and Follow-up Review
6	Project Workplan 2018
7	Examples of mission reports (Nepal AC Assessment; Viet Nam Investigation Training, Report and Evaluation)
8	Examples of tools and publications: Publication from last phase "Resource Guide on Good Practices in the Protection of Reporting Persons"
9	UNODC Anti-Corruption Regional Newsletter for Southeast Asia
10	Project Support Tools e.g. Monitoring Matrix on technical assistants needs and good practices identified in the Implementation Review Process

⁵³ https://www.unodc.org/unodc/en/evaluation/normative-tools.html#Eval_Report

⁵⁴ http://www.unodc.org/unodc/en/evaluation/Evaluation-based-knowledge-products.html#EQAs

⁵⁵ www.unevaluation.org/document/download/2601

⁵⁶ www.uneval.org/document/download/548

⁵⁷ https://undg.org/document/2017-undaf-guidance/

ANNEX IV. LIST OF PERSONS CONTACED DURING THE EVALUATION

Number of interviewees	Organisation	Type of stakeholder58Sex disaggregated data		Country	
8	UNODC	UNODC Staff	Male: 4 Female: 4	Austria (UNODC HQ)	
3	UNODC	UNODC Staff	Male: 2 Female: 1	Bangkok (UNODC ROSEAP office)	
1	UNDP	UNDP Staff	Male: 1 Female: 0	Singapore	
1	DFAT	DFAT Staff	Male: 1 Female: 0	Australia	
1	Anti-Corruption Commission of Myanmar	Government Recipient	Male: 1 Female: 0	Myanmar	
1	State Inspection and Anti- Corruption Authority	Government Recipient	Male: 1 Female: 0	Lao PDR	
2	Anti-Corruption Commission of Bhutan	Government Recipient	Male: 1 Female: 1	Bhutan	
26	Anti-Corruption Commission of Bangladesh	Government Recipient	Male: 24 Female: 2	Bangladesh	
6	Commission for the Investigation of Abuse of Authority	Government Recipient	Male: 6 Female: 0	Nepal	
3	Office of the Prime Minister	Government Recipient	Male: 3 Female: 0	Nepal	
20	CIABOC	Government Recipient	Male: 16 Female: 4	Sri Lanka	
20	KPK	Government Recipient	Male: 16 Female: 4	Indonesia	
2	Anti-Corruption Unit of Cambodia	Government Recipient	Male: 0 Female: 2	Cambodia	

⁵⁸ This could be e.g. Civil Society Organisation; Project/Programme implementer; Government recipient; Donor; Academia/Research institute; etc.

2	Financial Intelligence Unit	Government Recipient	Male: 1 Female: 1	Cambodia
1	TI Cambodia	Civil society	Male: 1 Female: 0	Cambodia
2	National Anti- Corruption Commission	Government Recipient	Male: 2 Female: 0	Thailand
Total: 99			Male: 80 Female: 19	