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Independent In-depth evaluation of  
**The Global Programme against Money Laundering,  
Proceeds of Crime and the Financing of Terrorism**

2011-2017

GLOU40  
Global

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# CONTENTS

	<i>Page</i>
GLOSSARY OF TERMS USED .....	iv
EXECUTIVE SUMMARY .....	vi
SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS .....	ix
I.INTRODUCTION.....	1
Background and context .....	1
Limitations .....	9
II. EVALUATION FINDINGS .....	11
Design and relevance .....	11
Effectiveness .....	16
Efficiency .....	33
Impacts .....	36
Partnerships and cooperation .....	41
Sustainability.....	45
Human Rights and Gender .....	47
III.CONCLUSIONS.....	49
IV.RECOMMENDATIONS .....	51
V.INNOVATIONS AND LESSONS LEARNED.....	53
ANNEX I. TERMS OF REFERENCE OF THE EVALUATION .....	54
ANNEX II. REVISED RESULTS FRAMEWORK/ EVALUATION MATRIX .....	76
ANNEX III. DATA COLLECTION STRATEGY .....	84
ANNEX IV. DESK REVIEW LIST .....	86
ANNEX V. STAKEHOLDERS CONSULTED FOR THE EVALUATION .....	88
ANNEX VI. EVALUATION TOOLS: INTERVIEW & SURVEY PROTOCOLS .....	89
A. Questions for country counterparts and beneficiaries.....	89
B. Questions for mentors and advisors .....	90
C. Questions for representatives of partner organizations .....	91
D. Survey questionnaires. ....	92
ANNEX VII.SUPPLEMENTARY EVIDENCE ON RESULTS .....	93
ANNEX VIII: Summary recommendations of the 2011 midterm evaluation .....	97

## GLOSSARY OF TERMS USED

<b>AML</b>	Anti–Money Laundering
<b>AMLID</b>	Anti–Money Laundering International Database
<b>APG</b>	Asia/Pacific Group on Money Laundering
<b>ARIN-AP</b>	Asset Recovery Interagency Network - Asia Pacific
<b>ARINSA</b>	Asset Recovery Interagency Network for Southern Africa
<b>ARINWA</b>	Asset Recovery Interagency Network for West Africa
<b>ARS</b>	Alternative Remittance Systems
<b>CBT</b>	Computer-Based Training
<b>CCP</b>	Global Container Control Programme
<b>CCPCJ</b>	Commission on Crime Prevention and Criminal Justice
<b>CFT</b>	Countering the Financing of Terrorism
<b>CGAP</b>	Consultative Group to Assist the Poor
<b>CITO</b>	Chief Information Technology Officer
<b>CND</b>	Commission on Narcotic Drugs
<b>CRS</b>	Congressional Research Service
<b>CTED</b>	Counter-Terrorism Committee Executive Directorate
<b>CTITF</b>	Counter-Terrorism Implementation Task Force
<b>DIAN</b>	Colombian National Tax and Customs Office (as per acronym in Spanish)
<b>DNFPBs</b>	Designated Non-Financial Businesses and Professions
<b>ESAAMLG</b>	Eastern and Southern Africa Anti-Money Laundering Group
<b>FATF</b>	Financial Action Task Force
<b>FBI</b>	The United States Federal Bureau of Investigation
<b>FIU</b>	Financial Intelligence Unit
<b>FSRB</b>	FATF-Style Regional Body
<b>GABAC</b>	Central Africa Anti-Money Laundering Group
<b>GDP</b>	Gross Domestic Product
<b>GLOB79</b>	UNODC Project/Global Programme B79 (GPML 1997-2009)
<b>GLOU40</b>	UNODC Project/Global Programme U40 (GPML 2008-2012)
<b>GOPAC</b>	Global Organization of Parliamentarians against Corruption
<b>GPML</b>	Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism
<b>HRG</b>	Human Rights and Gender
<b>IADB</b>	Inter-America Development Bank

<b>ICRG</b>	International Country Risk Guide
<b>IEU</b>	Independent Evaluation Unit
<b>IFF</b>	Illicit Financial Flows
<b>IMF</b>	International Monetary Fund
<b>IMoLIN</b>	International Money Laundering Information Network (GPML website)
<b>INL</b>	The United States Bureau of International Narcotics and Law Enforcement Affairs
<b>INTERPOL</b>	International Criminal Police Organization
<b>IT</b>	Information Technology
<b>ITS</b>	UNODC's Information Technology Service
<b>ITTO</b>	The International Tropical Timber Organization
<b>MONEYVAL</b>	Council of Europe - Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
<b>NCSR</b>	International Narcotics Control Strategy Report
<b>NPO</b>	Non-Profit Organization
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>OECD/DAC</b>	OECD Development Assistance Committee
<b>PPP</b>	Public-Private-Partnership
<b>PROFI Bi</b>	Programme and Financial Information Management System (pre-UMOJA)
<b>SGDs</b>	UN's Sustainable Development Goals
<b>SWOT</b>	Strengths, Weaknesses, Opportunities, and Threats
<b>TA</b>	Technical Assistance
<b>TBML</b>	Trade-Based Money Laundering
<b>ToT</b>	Training-of-Trainers
<b>TPB</b>	Terrorism Prevention Branch
<b>TREIN</b>	FATF's Training and Research Institute
<b>UN</b>	United Nations
<b>UNEG</b>	United Nations Evaluation Group
<b>UNGASS</b>	United Nations General Assembly Special Session
<b>UNODC</b>	United Nations Office on Drugs and Crime
<b>UNOPS</b>	United Nations Office for Project Services
<b>UNOV</b>	United Nations Office at Vienna
<b>UN-SWAP</b>	UN System-wide Action Plan on Gender Equality and the Empowerment of Women
<b>US</b>	United States
<b>WB</b>	World Bank
<b>WCO</b>	World Customs Organization
<b>WG</b>	Working Group

## EXECUTIVE SUMMARY

The Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GLOU40 or GMPL), initiated as GLOB79 in 1997, is the UNODC’s primary technical assistance programme on anti-money laundering (AML) and financing of terrorism (CFT). It is the only programme with a global mandate to work with Member States to promote regulatory and legal environments that are informed by the cross-cutting aspects of money laundering and the financing of terrorism, and contributing to the strengthening of governance and anti-corruption policies. By offering specialized tools to prevent and suppress illicit financial flows (IFF), the Programme helps UNODC achieve its mandates on countering crime and drugs-related offences. GPML also contributes to the development of sound economic and financial environments in the Member States by adding to financial integrity and transparency, which is a prerequisite for generating long-term sustainable development and investment. An in-depth midterm evaluation of the GPML was conducted in 2010-11, which found the GPML to have been successful in influencing the adoption of national legislation and the establishment of law enforcement institutions and procedures through its mentoring, training and information support systems. Building on this study, the current evaluation examined the outcomes and impacts of the GPML for the period of 2011 to April 2017. In addition to assessing the achievements of the current design of the global programme, the main objective of this independent evaluation was to generate and facilitate learning for future programming in the field of GPML. The evaluation employed a mixed-methods approach involving desk document review, surveys, interviews and focus group discussions with stakeholders, training feedback, and field missions to arrive at the following findings, conclusions, recommendations and lessons learned.

### *Evaluation Findings*

**Relevance and design:** The evaluation finds that the project objectives are consistent with the UNODC’s mandates and global priorities in the area of AML/CFT and that they match the needs of beneficiaries. GPML is small but important part of the global AML/CFT regime. GPML has worked on developing national programmes that support a risk-based approach to prevention and detection, and help improve prosecution outcomes in the areas of AML/CFT. Further, within the limits of its own mandates and resources, the project has been reasonably flexible in responding to evolving needs and new threats. The evaluation also finds that the programme is highly relevant in relation to the UN’s Sustainable Development Goals (SDGs), especially SDG 16.4, which calls for significant reduction in “illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime” by 2030, and SDG 16.5 for substantial reduction in “corruption and bribery in all their forms”. As crime and corruption are major obstacles to development, GPML is relevant not just to achieving SDGs 16.4 and 16.5, but also to contributing to the SDG agenda in general. However, GPML needs to incorporate human rights and gender issues more explicitly in its design to better meet UNODC guidelines on these issues.

**Effectiveness:** The evaluation finds that GPML has been effective in achieving the intended outcomes and shows significant promise in reaching its intended objectives through its training, mentoring and other technical assistance activities, as well as its integration in the broader AML/CFT regime. Specifically, GPML has made significant contributions towards ensuring that relevant stakeholders in supported countries are aware of the negative economic and social impact of money laundering and the financing of terrorism. GPML has also been an important actor in disseminating the knowledge and expertise necessary to deal with AML/CFT. Finally, GPML has played a part in strengthening AML/CFT coordination and cooperation among Member States, International Organizations and AML/CFT regional bodies. There are some areas that require greater attention of the management for them to be even more effective. To that end, the organizational structure of GPML may also need to be modified to achieve greater effectiveness.

**Efficiency:** The efficiency questions pertain to cost-effectiveness in converting inputs into outputs. The evaluation finds that GPML's activities were carried out on time. It had a total budget of US \$25,986,725 over a six-year period from 2011 to 2016. The annual expenditure on GPML activities has generally been increasing from \$2.2 million in 2005 to \$2.7 million in 2011 to \$4.8 million in 2016. GPML has especially witnessed a major expansion and associated increase in expenditure over last two years. It has utilized a Training-of-Trainers (ToT) approach in some projects, which is cost-effective. On the other hand, GPML's flagship mentorship programme is expensive, as is the case with capacity building activities in general. While granular data to determine its cost-effectiveness was not available, it appears that the GPML is using its resources efficiently, although, opportunities for further improvement exist, especially in the use of eLearning modules.

**Impact:** Impact refers to the achievement of the GPML's objectives pertaining to long-term benefits to targeted beneficiaries, including institutional, regime and social transformations. The evaluation finds that GPML has made a significant positive impact on AML/CFT to stakeholders and that its role is important for beneficiaries for whom GPML is the main source for access to technical assistance on AML/CFT. Beneficiaries have modified their legislation to comply with FATF recommendations, and the policy environment in most countries has improved. Further, the evaluation found evidence of long-term effects of training and technical assistance, including in relation to mutual evaluations. The evidence is not systematic, but beneficiaries credit GPML with helping change both ideas and practices on tackling AML/CFT issues. GPML also has substantial potential opportunities to explore, going forward. There are several money laundering and terrorist financing hotspots in the world in which GPML is yet to become operational. GPML has started providing assistance on cryptocurrencies, but is yet to focus on other emerging challenges such as trade-based money laundering.

**Partnerships:** GPML has established working partnerships within UNODC and multiple stakeholders including international and regional bodies, and national actors. The partnership arrangements currently in place have helped GPML achieve its results. More partnership opportunities exist and should be explored. A key obstacle in this area is fund-raising and occasional competition for funds between different UNODC divisions as well as different organizations providing AML/CFT capacity building.

**Sustainability:** The global institutionalization of AML/CFT policies, regulation and legislation entails a need for sustainable AML/CFT provisions. The programme is an important contributor to sustainability, although effectiveness depends on capacity development, which needs continued support. GPML, through its mentorship programme, networks such as ARINSA, Training-of-Trainers activities, and work with FIUs is actively contributing to national ownership of AML/CFT frameworks. GPML itself cannot be sustained without continued support, especially as it does not benefit from regular budget contributions. While that is true of UNODC as a whole, GPML in particular is extremely vulnerable to changes in donor priorities, especially the anticipated decrease by the Programme's biggest donor.

**Human and gender rights:** There is a large body of UN resolutions and other commitments binding UNODC and Member States to mainstreaming human and gender rights in its programmes and projects. While GPML’s work contributes to UNODC achieving these mandates, it does not provide explicit information on these commitments and frameworks in its programme documents and reports. This is perhaps due to the fact that AML/CFT issues are mostly considered HRG-blind. The evaluation notes the need for the programme to provide more clarity on these issues (e.g. on data protection and information exchange).

### ***Conclusions:***

GPML is one of the flagship programmes of the UNODC, and it has made a significant contribution to tackling the challenge of AML/CFT around the world. Its efforts have contributed to changes in legislation and policies as well as built capacity of officials to effectively implement these policies in countries receiving its technical assistance. As a result of its mentoring, network development, training and other capacity development work, many countries exhibit better awareness and enforcement on money-laundering and financing of terrorism. While significant progress has been achieved, it would be naïve to get complacent. Money laundering and financing of terrorism continue to be a significant challenge around the world. Further, as old loopholes are plugged, new ones emerge. As a result of stricter financial sector regulations, trade-based money laundering, cryptocurrencies and internet gambling appear to be the most prominent emergent challenges. GPML needs to continue its efforts to make its work more self-sustaining, while deserving resources and support — along with more cost-effective strategies — to keep itself sustainable.

### ***Recommendations:***

GPML management needs to adopt a more strategic approach to identifying and targeting critical AML/CFT hotspots. It also needs to be alert to emergent challenges such as Trade-Based Money Laundering (TBML), internet gambling and cryptocurrencies. GPML should continue investing its efforts in promoting regional networks. It should also seek to broaden these networks by including local academic and research institutions for increased self-sustainability. It should continue exploring strategies to make mentoring as cost-effective as possible. Mentoring efforts should be complemented with Training-of-Trainers, eLearning and other means to promote cost effectiveness. To benefit from eLearning, GPML should mandate its use for as many activities as possible. UNODC management should also periodically undertake strategic assessments for ensuring that its product-market fit remains valid. These assessments are necessary for repositioning and rebranding its programmes. GPML should undertake a gender analysis of the focus and priorities of GPML with a view to ensuring its explicit consideration to the impact of activities and results on men and women.

### ***Lessons learned:***

GPML made a very effective use of mentoring to build capacity of member states, especially that of law enforcement agencies and FIUs, on AML/CFT effectiveness. However, mentoring is an expensive capacity development strategy. Given the tradeoff between effectiveness and efficiency, as well as resource limitations, GPML has deployed some cost-effective methods such as eLearning, Training-of-Trainers, and development of regional networks (e.g., ARINWA and ARIN-AP). This is a best practice that GPML should continue expanding, and that other programmes within the UNODC may do well to imitate.

The summary matrix on the next page provides more specific information on findings, supporting evidence and recommendations made by the evaluation.



## SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS

Findings	Evidence (sources that substantiate findings)	Recommendations
<b>Key recommendations</b>		
<p>1. GPML has made a significant contribution to tackling the challenge of AML/CFT. Its efforts have contributed to changes in legislation and policy in most countries, and have built the capacity of officials to effectively implement these in countries receiving its technical assistance. As a result of its efforts, many countries exhibit better awareness and enforcement on money laundering and the financing of terrorism. That said, GPML has limited or no presence in many prominent AML/CFT hotspots around the world.</p>	<p>Project documents, archival data, stakeholder consultations and survey responses.</p>	<p>GPML management needs to adopt a more strategic approach to identifying AML/CFT hotspots. GPML management should make better use of national risk assessments to plan its strategy and activities (including location of mentors).</p>
<p>2. Money laundering and financing of terrorism continue to be a significant challenge around the world. As old loopholes are plugged, new ones are created. There is, thus, a strong need to continue improving the AML/CFT regime, while also building capacity of a wide variety of law enforcement and associated agencies. For example, as a result of stricter AML/CFT regime (e.g., financial sector regulations), trade-based money laundering (TBML), cryptocurrencies and internet gambling appear to be the most prominent emergent challenges.</p>	<p>Project documents, archival data, stakeholder consultations and survey responses.</p>	<p>GPML management needs to undertake detailed studies on how to tackle TBML and other emerging challenges. Based on the results of this study, GPML may need to revise its strategies and programme design.</p>
<p>3. Regional networks like ARINSA, ARIN-AP and ARINWA promoted by the GPML have helped build a critical mass of awareness and capacity among member states, and hence should prove to be an</p>	<p>Project documents, archival data, stakeholder consultations and survey responses.</p>	<p>GPML management should continue investing its efforts in promoting regional networks. It should also seek to broaden these networks by including local academic and research institutions for increased self-sustainability.</p>

important asset in making the work of GPML self-sustainable.		
4. GPML's Mentoring programme is widely recognized as an effective mechanism for building trust and relationships necessary towards changes in AML/CFT regimes. However, it is relatively an expensive mode of capacity development that needs to be supplemented with other strategies to be truly cost-effective.	Project documents and stakeholder consultations.	GPML management should explore the possibility of relocating mentors every few years to countries that require greater assistance to make the best use of its resources. Moreover, their efforts should continue to be complemented with other means to promote cost effectiveness (see also in conjunction with the next recommendation).
5. Given resource constraints and the limited reach of GPML, use of cost effective strategies such as eLearning is critical. However, to make eLearning itself cost effective, its use needs to be promoted to a far greater user base for basic, preparatory and refresher purposes. eLearning course material can also be used for some advanced purposes if the right material and techniques are utilized.	Stakeholder consultations and survey responses.	GPML management needs to promote eLearning more aggressively, including by insisting that its mentors and trainers make greater use of available training modules.
6. GPML is considered to be good at long term impact in countries that have already understood the importance of AML/CFT work (e.g., Kazakhstan). In other countries, where AML/CFT has not been prioritized, there is need for greater awareness creation.	Project documents, stakeholder consultations and survey responses.	GPML management should use tools for wider dissemination and feedback collection. It should also use web counters to keep track of resources that are being used (accessed, downloaded, etc.) to understand beneficiaries' needs better.
7. GPML has been very successful in developing and leveraging partnerships and collaboration with some organizations (e.g., FATF), including promoting new regional networks (e.g., ARINSA), but resource constraints have weakened other ties (e.g., World Bank) to some extent.	Project documents and stakeholder consultations.	GPML management needs to be more careful in tending to the weakening ties, including by exploring new areas and resources for collaboration.
8. Given the perceived success of international efforts, anti-money laundering is in danger of becoming a lower priority for some prominent donors, however countering the financing of terrorism will likely become even more significant issue.	Project documents and stakeholder consultations.	UNODC management, with the support of GPML, should periodically undertake strategic assessments for ensuring that its product-market fit remains valid. These assessments are necessary for repositioning and rebranding its programmes. In the present context, it may be necessary for the GPML management to explore the possible development of new products and services, or adapting existing ones, in order to help partner organizations and Member States to specifically address the CFT dimension of AML/CFT.

<p>9. While the project does a very good job of reporting its activities and outputs, there is a need to improve results-orientation in all aspects of monitoring, evaluation and reporting. Moreover, the quality of the data needs to be more detailed/ granular to not just generate reports that clearly lay out expenditures on various major activities (e.g., cost effectiveness of various components and interventions), but also link these to planned and obtained outcomes specified in the results-matrix. This information is needed for more effective decision-making.</p>	<p>Project documents, archival data, stakeholder consultations and survey responses.</p>	<p>GPML management should undertake steps to improve its results-based monitoring and evaluation system. Its efforts to use the Kirkpatrick model are a step in the right direction, but the management should go beyond training outcomes data to collect outcomes information on other aspects of technical assistance. These efforts could include assigning specific M&amp;E roles and responsibilities to staff and partners.</p>
<p>10. While AML/CFT issues are often perceived as gender neutral, that is not the case. There is a need for increased awareness on human rights and gender (HRG) issues among all stakeholders.</p>	<p>Project documents and stakeholder consultations.</p>	<p>GPML should undertake steps to increase focus on gender mainstreaming in project planning, implementation and reporting. It should ensure that all activities and intended results of the programme give consideration to differential impact on men and women. It should also explore undertaking research on the connections between HRG and AML/CFT, and seek to establish UNODC &amp; GPML as a leader in this field.</p>
<p>11. Some stakeholders suggest that GPML operates at an operational level and may need to increase its strategic focus, especially when compared to its counterparts such as IMF &amp; WB.</p>	<p>Project documents and stakeholder consultations.</p>	<p>For increased effectiveness, GPML needs to improve its engagement with higher level policy makers. This is especially important in order for the programme to make a meaningful contribution to the SDGs. GPML should also explore pathways for strengthening the links between GPML and the development agenda (e.g. through asset recovery), particularly in low income countries.</p>
<p><b>Important recommendations</b></p>		
<p>12. GPML's programme management arrangements (with several P4 officers, but no P5, for example) are less than ideal, and need to be looked into. In bureaucratic settings (for dealing with governments, for example), GPML needs a higher profile to deal with partners and national counterparts.</p>	<p>Project documents, stakeholder consultations.</p>	<p>GPML needs increased visibility, and UNODC senior management should consider either elevating the programme officer, or provide at least one regular budget position in the next biennial cycle, or exploring other options outlined in the recommendations section.</p>



# I. INTRODUCTION

## ***Background and context***

The Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GLOU40 or GMPL, henceforth), initiated as GLOB79 in 1997, encourages policy development on anti-money-laundering (AML) and countering the financing of terrorism (CFT), raises public awareness about the cross-cutting aspects of money laundering and the financing of terrorism, contributes to the strengthening of governance measures and anti-corruption policies, and acts as a centre of expertise on AML and CFT. The Programme is pivotal to UNODC's mandate to prevent drug offences and other crimes in that it offers specialized services and tools to help Governments deal with an important component of action against crime with a view to removing the profits of such crime and providing a disincentive for committing them. Through the Global Programme, technical assistance has been provided to Member States in Asia, the Pacific, Eastern Europe, the Middle East, North Africa, West Africa, Central Africa, sub-Saharan Africa, Latin America and Caribbean. GPML, a repository of best practices, is the only source of technical cooperation with a global mandate to deal with all aspects of the fight against money-laundering and the financing of terrorism. It adds to financial integrity and transparency with a view to contributing to the development of sound economic and financial environments in UN Member States, a prerequisite for generating long-term sustainable development and investment.

GPML's activities are carried out under the UNODC Theme of Rule of Law, and the programme contributes to the result area 1.2 on International cooperation in criminal justice matters. Specifically, it addresses the following:

Result 1.2.2 - Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering and the financing of terrorism in accordance with relevant General Assembly (GA) resolutions.

Result 1.2.3 - Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering related to organized crime, drug trafficking and corruption.

GPML also contributes to Sustainable Development Goal 16.4, which calls for significant reduction in "illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime" by 2030.

The overall objective of the project is to "Assist Member States to prevent and suppress illicit financial flows (IFF) from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT)". The project seeks to deliver several outputs towards achieving outcomes reproduced below. Note that, for the purposes of this evaluation, the results matrix of the programme (also known as the logframe or logical framework) has been

revised ([Annex II](#)) to more fully confirm with the OECD/DAC guidelines, as well as to make it more evaluation-friendly.

**Chart 1: GLOU 40 / GPML at a glance**

**A. Training workshops in Moldova & Vietnam**



**B. Launch of Asset Recovery Network in West Africa (ARINWA), Ghana**



**Source: UNODC Project documents.**

An in-depth midterm evaluation of the GPML was conducted in 2010, which found the GPML to have been successful in influencing the adoption of national legislation and the establishment of law enforcement institutions and procedures through its mentoring, training and information support systems. Model legislation developed by the programme had been used in national legislation and Financial Intelligence Units (FIUs) had been established in several countries. Some of the supported countries had progressed to the extent that they were providing training services

to their neighboring countries. The mentoring system has been acknowledged to be successful in assisting countries in establishing AML legal regimes and improved law enforcement. Building on this study, the current evaluation will examine the outcomes and impacts of the GPML for the period of 2011 to April 2017.

## GLOU40 Project Objectives and outcomes

The overall objective of the project is to “Assist Member States to prevent and suppress illicit financial flows (IFF) from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT)”. To achieve this objective, the project includes 3 main outcomes as reproduced below in Chart 2.

Chart 2. Project objectives and outcomes as per project documents	
<b>Project objective:</b> “Assist Member States to prevent and suppress illicit financial flows (IFF) from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT)”	
<p><b>Output 1.1:</b> Legislative bodies, criminal justice officials, financial supervisory and regulatory authorities, law enforcement officials and FIU personnel have increased awareness of money laundering and terrorism financing issues and methods to combat them.</p> <p><b>Output 1.2:</b> GPML has researched, drafted and disseminated reports, briefing notes, speeches, publications, and studies related to IFF and AML/CFT.</p> <p><b>Output 1.3:</b> The International Money Laundering Information Network (IMoLIN), including the Anti Money Laundering International Database (AMLID) is promoted, used and updated.</p> <p><b>Output 1.4:</b> GPML’s contribution to Regional and Country Programmes and Strategies.</p> <p><b>Output 1.5:</b> Reporting to the Commission on Narcotic Drugs (CND) and the Commission on Crime Prevention and Criminal Justice (CCPCJ) is provided.</p>	<p><b>Outcome 1:</b> Member States have available improved knowledge on illicit financial flows, money-laundering and the financing of terrorism.</p>
<p><b>Output 2.1:</b> Reviewed and enhanced AML/CFT laws, regulations, and policies to align with relevant UN Conventions and international standards.</p> <p><b>Output 2.2:</b> Assisted Member States have mandated and trained national regulatory and financial supervisory officials, judiciary and law enforcement officials, including Financial Intelligence Units personnel, to deal with AML/CFT.</p>	<p><b>Outcome 2:</b> Member States have effective and updated AML/CFT legal frameworks, regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards.</p>
<p><b>Output 3.1:</b> Creation of formal and informal networks among AML/CFT professionals.</p> <p><b>Output 3.2:</b> Expert technical advice and inputs are provided to inter-regional and international stakeholders dealing with AML/CFT matters.</p> <p><b>Output 3.3:</b> Assisted Member States have enhanced mechanisms and tools for bilateral and multilateral cooperation on AML/CFT.</p> <p><b>Output 3.4:</b> Assisted Member States have informal, regional networks for the confiscation and forfeiture of criminal proceeds.</p>	<p><b>Outcome 3:</b> Enhanced national-level coordination and regional/international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters.</p>

As stated before, after reviewing all the project documents, the evaluation team modified this results framework<sup>1</sup> to better comply with UNODC and OECD-DAC terminology.

## Funding and disbursement history

<sup>1</sup> Please also see Annex II as well as Chart 10.

Chart 3 shows the GPML budget for the period of 2011-16. As per documents reviewed by the evaluation team, the original budget and donor pledges for the programme were almost twenty-six million dollars (Fifty-six million dollars since the inception of the project in 2004). The United States Bureau of International Narcotics and Law Enforcement Affairs (INL) was the largest contributor to the project. 54% of the pledged funding was contributed by the INL, followed by UK (12%), Switzerland (6%), Colombia (6%), Japan (5%), and Canada (5%).

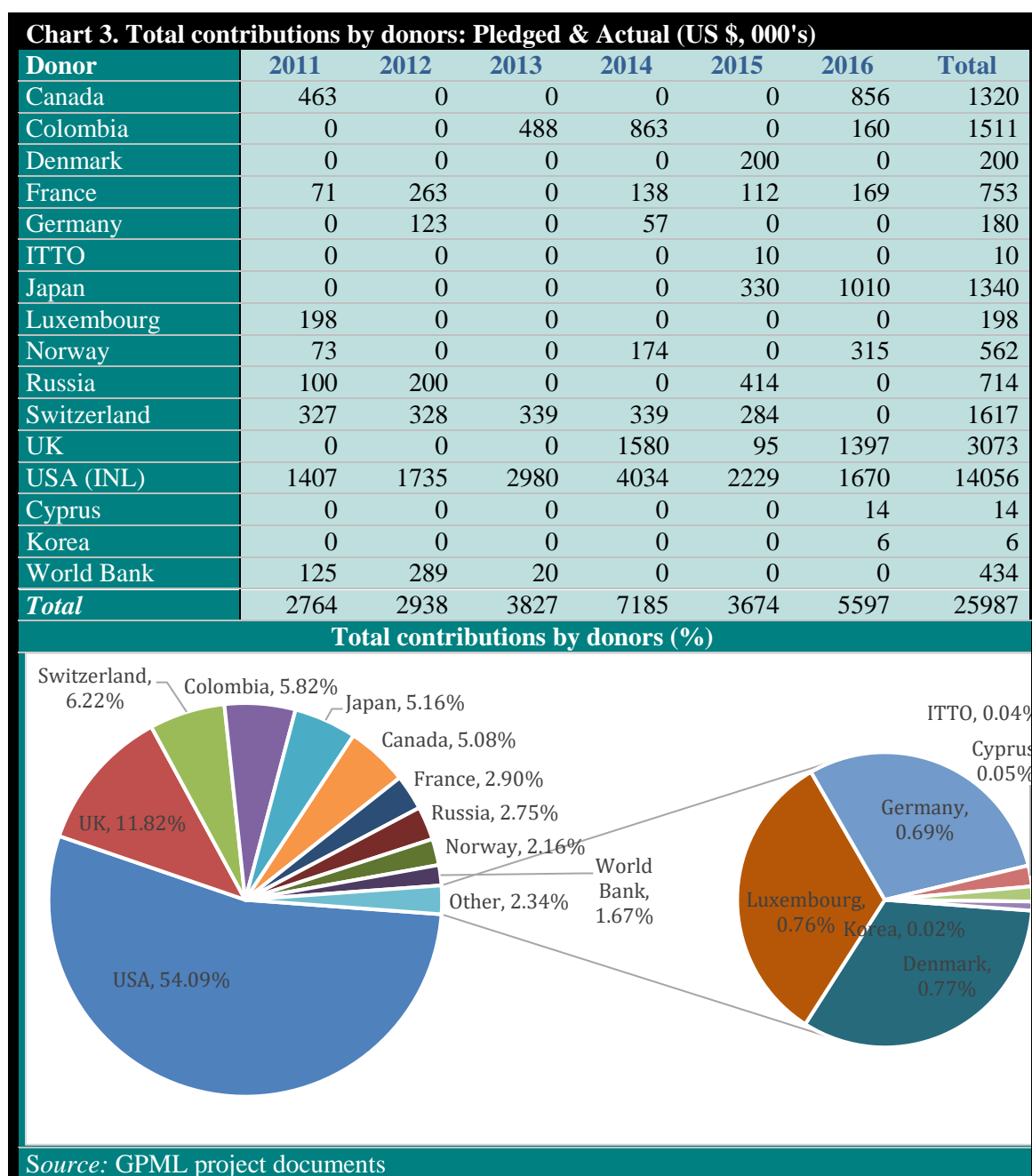
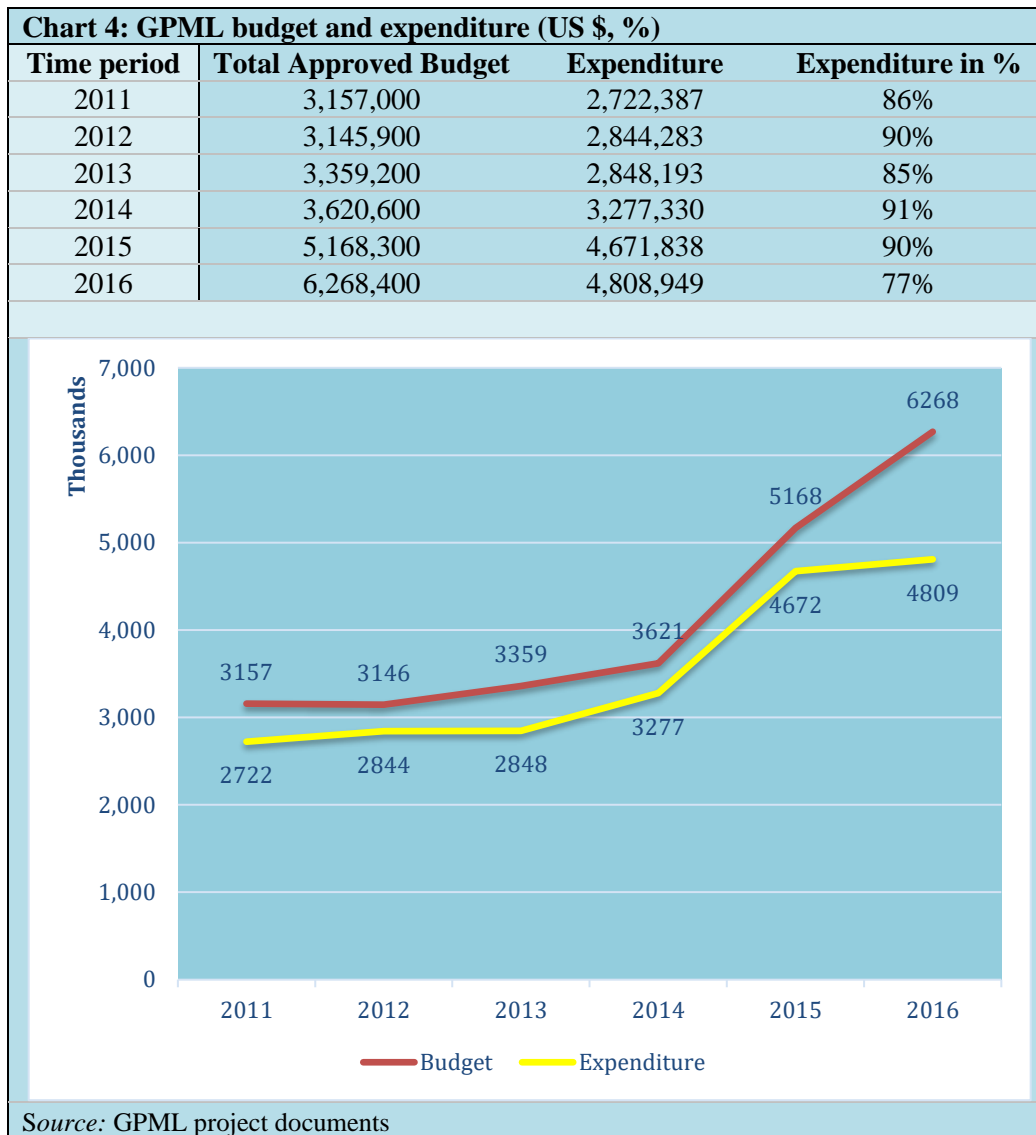




Chart 4 below provides information on total budget and expenditure for the period under evaluation. As shown in the chart, the project has shown steady growth over this period: Total approved budget has doubled from just over three million dollars in 2011 to over six million US dollars in 2016, and project expenditure has increased from \$2.7 million in 2011 to over \$4.8 million in 2016.

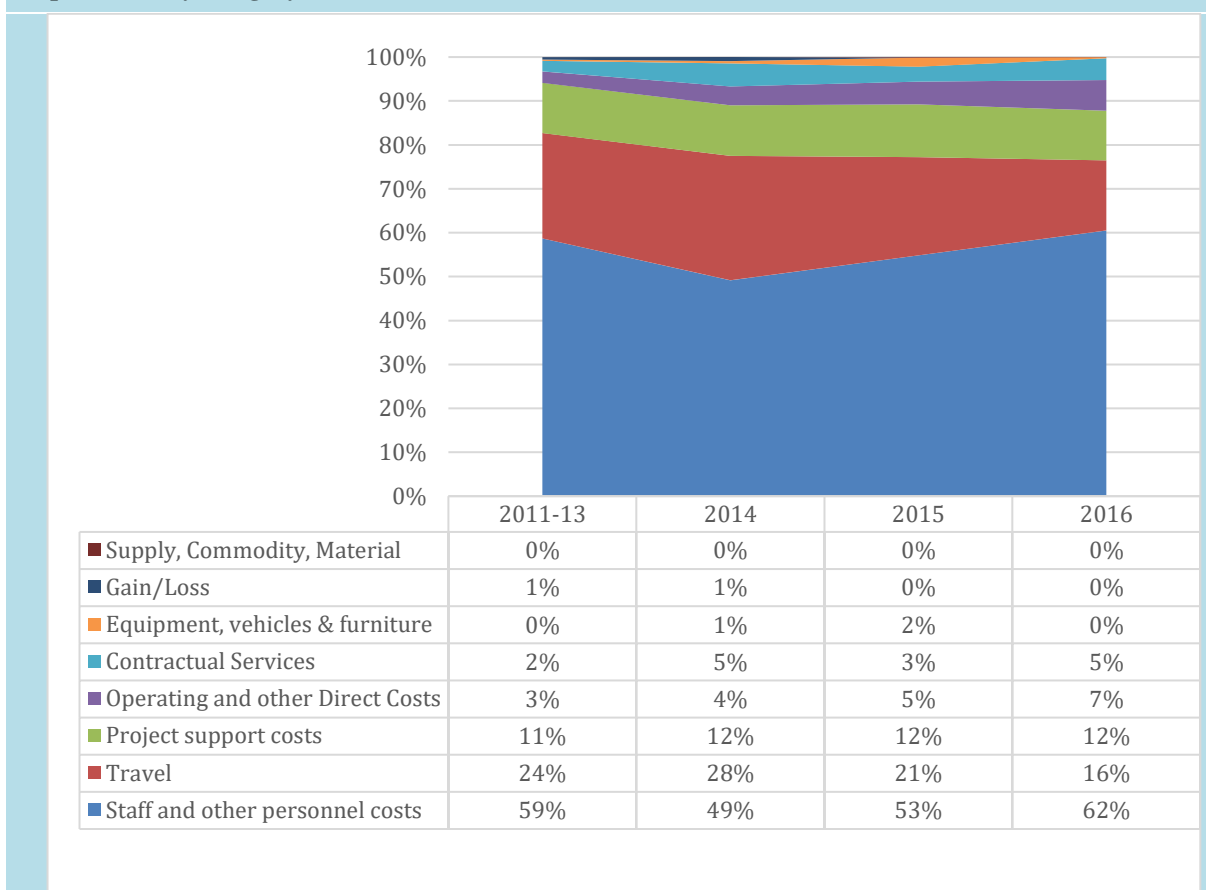


As per the latest audited statements summarized in Chart 5 below, GPML had a total expenditure of over 28 million US dollars (as of December 31, 2016). In line with expectations for a capacity building programme of this nature, a majority of the expenditure was on staff (57%), which was followed by travel (23%), project support costs to UNODC (11%), operating costs (4%), contractual services (3%), and other (2%). As can also be observed from the area plot in Chart 5, these expenditure categories are generally stable across time (in terms of proportion), although travel expenditure has gone down, staff expenditure has slightly increased over last 2-3 years.

<b>Chart 5. Total expenditure by category (US \$, 000's)</b>					
	<b>2008-13</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Total</b>
Staff and other personnel costs	8991	1626	2501	2959	16078
Contractual Services	367	173	154	241	935
Operating and Other Direct Costs	394	143	238	344	1118
Supply, Commodity, Material	2	1	7	1	11
Equipment, Vehicles and Furniture	48	18	93	12	172
Grant Out			198	-82	116
Travel	3676	936	1019	781	6412
Project support costs	1752	380	547	553	3233
Gain/Loss	85	30			115
<b>Project Total</b>	<b>15315</b>	<b>3307</b>	<b>4758</b>	<b>4809</b>	<b>28189</b>

**Note:** As ProFi BI (reporting tool pre-Umoja) has gone offline, GPML could not provide breakdown of annual expenses from 2008-13.

**Expenditure by category:**



## Evaluation backdrop, purpose, and specific objectives

This mandatory in-depth, mid-term evaluation was undertaken as agreed with the donors and as planned and budgeted in the approved project document. The evaluation used a mixed-method approach, and aimed to examine the programmatic progress (and challenges) primarily at the outcome level, with supporting substantiation at the output level. The evaluation covered the entire programme, with the exception of activities carried out in the Mekong region which were the object of a separate Independent Project Evaluation, over the six-year period from March 2011 to April 2017.

As per terms of reference (ToR) in [Annex I](#), the main objective of this independent evaluation is to generate and facilitate learning for future programming in the field of GPML, in addition to assessing the achievements of the current design of the global programme as regards its relevance, design, efficiency, effectiveness, impact, partnerships and sustainability. A special attention was paid to assessing the human rights and gender mainstreaming aspects during all phases of the programme. This meant examining a) identified HRG issues and relations that are (or could be) important to the GPML; b) the extent to which the programme has integrated a HRG in design, implementation and monitoring; and, c) the way in which the programme is responding to and affecting the rights, needs and interests of different stakeholders, including women and men<sup>2</sup>.

Lastly, the evaluation also sought to assess progress in implementation of the recommendations of the previous in-depth evaluations. The evaluation findings will be shared among relevant stakeholder and used to inform and better direct GPML programme strategy and activities in thematic areas, as well as helping to effect change in the money laundering, proceeds of crime and financing of terrorism sectors.

The evaluation was conducted by a team consisting of Punit Arora (team leader), Eleni Tsingou (AML expert), Eva Otero (Gender expert), and Carlos Asenjo-Ruiz (IEU).

### Evaluation Methodology

To meet the evaluation objectives outlined above (see also [Annex I](#)), the evaluation team reviewed and revised the logical framework ([Annex II](#)) and evaluation questions specified in the terms of reference ([Annex III](#)) to be more in line with the OECD-DAC guidelines on results-based management. Following UNEG guidelines<sup>3</sup>, the evaluation team conducted a preliminary Human Rights and Gender (HRG) evaluability assessment during this inception phase. The team devised a multi-pronged data collection methodology consisting of five data collection processes, some of which ran concurrently. [Annex III](#) also provides data collection strategy for each question mentioned in the terms of reference.

The first process in this methodology consisted of an analysis of existing documents, including project reports, progress reports, review and evaluation reports and various technical notes and operating procedures developed by the GPML team. Key documents were revised from a HRG

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<sup>2</sup> “Gender responsive evaluations in the work of UNODC: Guiding document” (2017)

<sup>3</sup> “Integrating Human Rights and Gender Equality in Evaluations” (2014).

approach. All relevant documents supplied by the project team were reviewed (See [Annex IV](#) for details).

The second process involved attending meetings of coordination bodies. The evaluation team participated as observer at the FATF private sector forum in March in Vienna, Austria and the ESMALAAG meeting in April in Arusha, Tanzania. During these meetings, in addition to observing the proceedings, key stakeholders were interviewed. The team also used these meetings to distribute qualitative questionnaires to participants so as to gather information and insights about their relation to, and satisfaction with, the programme.

The third process involved field missions to four countries — Cyprus, Colombia, Panama, and South Africa — that have received assistance from the GPML. These field missions were undertaken in April 2017. UNODC and GPML stakeholders were interviewed on a mission to Vienna. All of these missions were undertaken in April 2017. In addition, the team interviewed officials from partner organizations such as the World Bank, IMF and IADB, donors such as the US INL at State Department in Washington, DC and other partners such as the goAML user group.

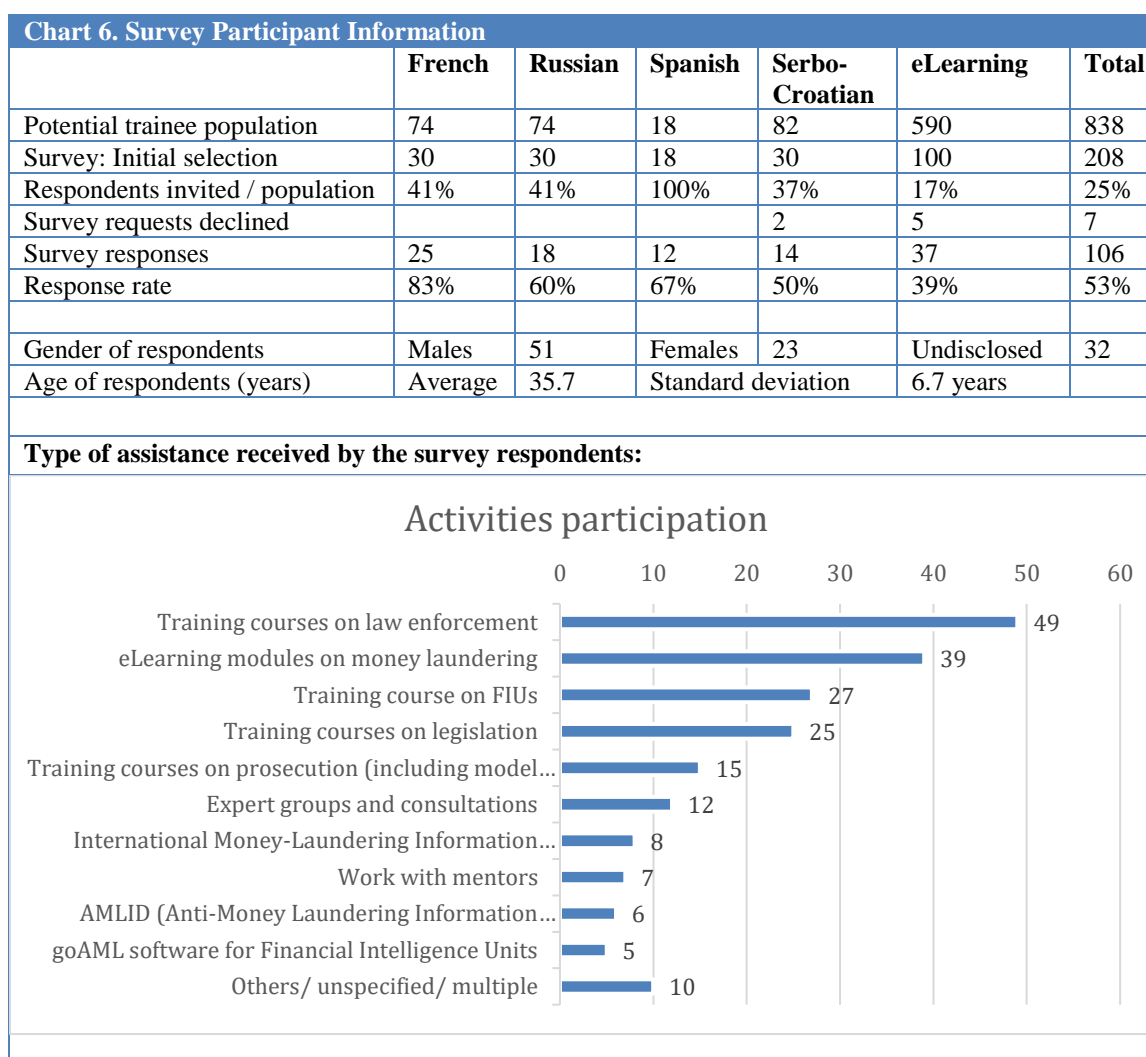
The fourth process involved interviewing 78 core learning partners ([Annex V](#)) and other stakeholders, including beneficiaries from across the region over telephone and web. GPML staff not present in Vienna during the April site visit were also interviewed remotely. The interviews, in person or over phone, were generally based on the semi-structured protocols intersecting with informants' backgrounds and including questions addressing HRG aspects (shown in [Annex VI](#)). The evaluation team also followed up with specific questions to elicit relevant information during interviews. These interviews helped provide context and/or further elucidate on the work performed and results obtained in the region.

Efforts were made to ensure that the evaluation team heard a wide variety of voices, in occasions going beyond the strict boundaries of the programme's influence, trying to reach out for example to HRG experts. The evaluation team also documented our list of interviewees in a sex-disaggregated manner.

Last but not the least, a central output of the programme consists of the training workshops conducted. In order to measure its effectiveness, a stratified random selection of 208 trainees was drawn in order to measure the use of the training and other technical assistance received. The survey was conducted via the surveying website [www.surveymonkey.com](http://www.surveymonkey.com).

It was administered in 4 languages: French, Russian, Spanish and English. The participants in Serbo-Croatian and eLearning courses were administered surveys in English, and others in the languages used for their trainings. The survey questionnaires were developed on the basis of the desk review, and are included in [Annex VIII](#). More information on sample and respondents is provided in Chart 6.

The evaluation team sought to ensure geographical breadth across the above-mentioned steps. It should be noted, however, that the evaluation does not cover the Mekong region, which was the object of a separate evaluation earlier in the year (The findings from that evaluation were separately taken into account during the desk review).



Overall, the evaluation team followed a mixed-methods approach with adequate triangulation and counterfactuals to arrive at credible, reliable and unbiased findings to the extent possible.

## **Limitations**

The evaluation team must specifically note the following possible limitations:

1. The evaluation team had undertaken primary data collection on a very tight timeframe, and hence confronted the trade-off between inclusiveness and timely completion. This hindered a robust HRG approach to some extent. The field missions planned for Moldova and Montenegro had to be cancelled for logistical reasons. These stakeholders were, instead, interviewed over phone. Similarly, while concerted attempts were made to interview all core-learning partners, in some cases their unavailability during the data collection period necessitated for the evaluation team to take a call on their participation. In some cases, the evaluation team

determined that the information was available from alternative sources and their participation was not necessary.

2. Adequate data on some of the outcomes and impacts has not been collected and the evaluation team struggled to triangulate information on some indicators. The evaluation team tried to overcome this limitation by collecting as much indicative evidence as possible (including in some cases by systematically collecting anecdotal evidence). The team also highlights limitations and suggests the need for improvement, where applicable.
3. The lack of HRG expertise within the GPML limited the evaluation capacity, particularly at the inception stage, to identify relevant bellwethers, gaps in research and/or potential key substantive issues relating gender/HR with CFT/AML that we could have focused on. To overcome this, the evaluation team resorted to external sources such as relevant evaluation fora and expert organizations in HRG.

## II. EVALUATION FINDINGS

This section details the primary findings from this mid-term in-depth evaluation of the Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GLOU40 or GMPL). The findings are discussed and grouped by the following OECD DAC criteria: design and relevance, efficiency, effectiveness, impact and sustainability of the project's activities and outcomes. Additionally, partnerships, human rights and gender mainstreaming as called for by the terms of reference for this evaluation were assessed. For each of these criteria, findings are then organized by the research questions driving the evaluation. While covering all the questions specified in the terms of reference, the focus is on those issues or topics that are identified as salient from the triangulated data. This section includes a table summarizing expected and actual outcomes (See Chart 10) and concludes with a SWOT analysis that provides a bird's eye view of programme's strengths, weaknesses, opportunities and threats.

### ***Design and relevance***

1. To what extent is the programme relevant to international efforts in combatting money laundering and terrorism financing at country, regional and global level? Did the implementation of the recommendations of various mid-term evaluations, at global and regional levels, lead to improved design and/or implementation of the programme?
  - The agenda of the GPML is in line with UNODC mandates as well as its global priorities and commitments. It is also aligned with the priorities and strategies of most Member-States.

Design and relevance questions broadly pertain to the strategic fit achieved by the project in helping UNODC deliver on its mandates, especially in the context of the larger AML institutional landscape. The larger the fit between strategy and environment, the greater is the continued relevance of the programmes and policies to the UNODC and its key stakeholders, including member-states.

In this context, it is important to highlight that the UNODC estimates<sup>4</sup> “the amount of money laundered globally in a year is 2 - 5% of global GDP, or \$800 billion - \$2 trillion in current US dollars”, which “underlines the seriousness of the problem governments have pledged to address.” Similarly, one of the rare reports<sup>5</sup>, compiled information mostly from FATF and other sources, and highlighted that money laundering continued to be a major world-wide problem. While developing countries are especially vulnerable to money laundering, even the developed countries are not immune to it. According to 1993 FBI estimates, money “derived from criminal enterprises and

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<sup>4</sup> <https://www.unodc.org/unodc/en/money-laundering/globalization.html>

<sup>5</sup> The United States Department of State, Bureau for International Narcotics and Law Enforcement Affairs, 2017 International Narcotics Control Strategy Report, <https://www.state.gov/documents/organization/268024.pdf>

then laundered in the United States” alone was approximately \$300 billion annually.<sup>6</sup> It is to meet this challenge that the global programme against money laundering was launched in 1997.

Anti-money laundering is also an integral component to reducing crime, corruption and terrorism of all kinds by dis-incentivizing monetary returns. It is in this backdrop that the GPML has received several mandates from the international community. While Chart 7 details these mandates, it is important to highlight four major international conventions. Three of these conventions are directly linked to money laundering (the Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, the Convention Against Transnational Organized Crime and the Convention against Corruption), and the fourth (the International Convention for the Suppression of the Financing of Terrorism) forms the basis for GPML’s mandate to fight terrorism. Thus, *prima facie*, GPML’s work is highly relevant to UNODC’s mandates.

#### **Chart 7. UNODC: Recent Mandates and resolutions on Anti-Money Laundering and Financing of Terrorism**

- GPML was established in 1997 in response to the 1988 UN Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances.
- GPML mandate was strengthened in 1998 by the United Nations General Assembly Special Session (UNGASS) Political Declaration and Action Plan against Money Laundering which broadened its remit beyond drug offences to all serious crime.
- Three further Conventions adopted provisions for AML/CFT related crimes: International Convention for the Suppression of the Financing of Terrorism (1999), UN Convention against Transnational Organized Crime (2000), and UN Convention against Corruption (2003)
- UN Security Council Resolutions 1267(1999), 1373(2001), 1540(2004), 1566(2004) and 1624(2005) call on UN Member States to combat terrorism, including financing of terrorism.
- Resolution 1617 (2005) of the UN Security Council “Strongly urges all Member States to implement the comprehensive, international standards embodied in the Financial Action Task Force’s (FATF) Forty Recommendations on Money Laundering and the FATF Nine Special Recommendations on Terrorist Financing”
- The United Nations Global Counter-Terrorism Strategy adopted by the UN General Assembly on in 2006, in the form of a Resolution (A/RES/60/288) and a Plan of Action, is a unique global instrument aimed at enhancing national, regional and international efforts to counter terrorism.

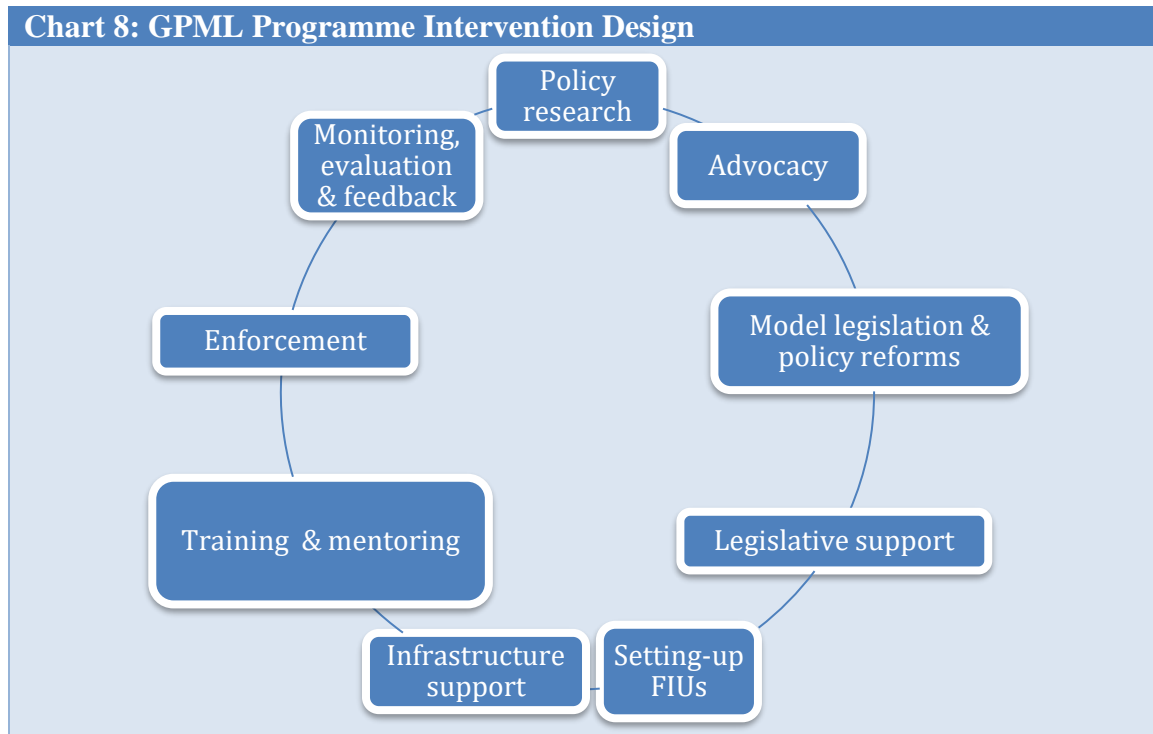
All interviewed stakeholders affirmed GPML’s relevance to their, and the global, campaign to curb money laundering and terrorist financing. As anti-money laundering measures are only as strong as the weakest link in the chain, it is essential to ensure that all countries that lag behind in implementing these measures are encouraged, advised and supported in becoming fully compliant with the global standards.

For a programme like GPML to be effective in achieving its results, it needs to accomplish a series of outcomes, i.e., building blocks of progress (Chart 8). GPML needs to work towards a comprehensive intervention ranging from researching effective interventions and advocating norms and standards, to providing support to policy-making and building capacity of various governmental agencies. Once interventions have been piloted and tested, they need to be adopted

<sup>6</sup> <https://link.springer.com/article/10.1007/BF02901594>



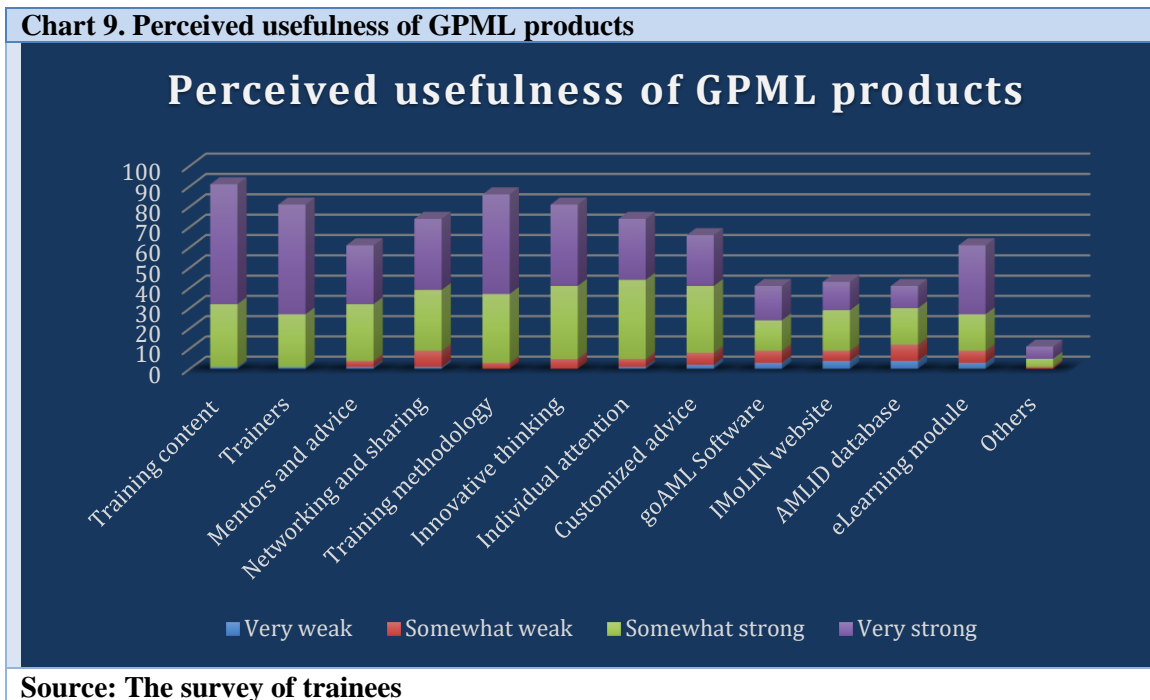
and used extensively. The experience from these interventions, then, feeds into the next round of policy research.



GPML’s work focuses on all of these outcomes. Various stakeholders, interviewed and surveyed, highlighted different aspects of support they received from the programme. Even survey respondents, who are primarily trainees of various capacity-building programmes including eLearning, confirmed GPML’s contributions to various outcomes (Chart 9).

These trainees rated GPML products to be highly relevant and useful to their needs. While all GPML products received “very strong” or “somewhat strong” ratings, training, trainers, and mentoring were especially highlighted as the core strengths of the programme in the fight against money laundering and the financing of terrorism.

Stakeholders, interviewed and surveyed, also recognized GPML’s core competitive advantages in certain aspects of AML/CFT work, especially as it pertains to law enforcement issues. GPML’s mentoring programme and knowledge and competence in enforcement issues were widely recognized as the mechanisms that made substantial contributions to improving AML regimes worldwide. Most of these stakeholders believed that while global financial institutions such as the World Bank and IMF had a competitive advantage in working with central banks on regulatory issues, GPML had a distinct advantage in working with law enforcement agencies and Financial Intelligence Units (FIUs) on actual implementation and effectiveness issues. UNODC’s wide ranging work and relationships also featured prominently in the GPML’s ability to assist Member States.



Further, most of these stakeholders indicated an ongoing need in their countries for technical and practical AML/CFT support. They mentioned that while AML/CFT legislation is in place in most countries, though sometimes more in theory than in practice, they needed the necessary infrastructure (e.g. trained financial investigators, IT systems, etc.) to enhance the effectiveness of implementation and compliance mechanisms. They suggested the need for more capacity-building support from UNODC/GPML. Such capacity-building, according to the beneficiaries, should cover training for financial investigators but also for prosecutors in order to enable a judiciary system that can lead to convictions.

Lastly, review of project documents and stakeholder consultations revealed that the GPML has been very responsive in implementation of the recommendations of various mid-term evaluations, at global and regional levels, and these have led to improved design and implementation of the programme.

Hence, the evaluation notes that the project objectives continue to be consistent with beneficiaries' requirements and country needs, as well as with UNODC's mandates and global priorities in the area of AML/CFT. It has been closely associated with key developments in national programming that support risk-based approach to prevention, detection and prosecution of money laundering and financing of terrorism. Further, the project has also been reasonably flexible, within the limits of its own mandates, in responding to the changing environment (e.g., providing training on the risk of money laundering from cryptocurrency).

2. To what extent are the outputs, outcomes and objectives of this project relevant to implementing the Sustainable Development Goals?
  - Multiple sources reveal a strong relevance of the outputs, outcomes and objectives of this project to implementing the Sustainable Development Goals.

Stakeholder interviews, survey responses, focus group discussions and project documents all confirmed that the work being undertaken by the GPML project was highly relevant to achieving Sustainable Development Goals (SDGs). SDGs adopted by the United Nations General Assembly in September 2015 provide a plan of action for people, planet and prosperity to be implemented over the next 15 years. SDG 16.4 calls for significant reduction in “illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime” by 2030, and SDG 16.5 for substantially reduction in “corruption and bribery in all their forms” over the same timeframe.

Despite the fact that SDGs were adopted towards the end of the period under evaluation, it was readily apparent from review of documents as well as interviews and discussions with the stakeholders that GPML’s agenda, strategy and results framework (that specifies project’s outputs, outcomes, objectives and indicators) are in alignment with the SDGs mentioned above. Even on those components of SDGs 16.4 and 16.5 that GPML does not directly address (e.g., stolen asset recovery or corruption), it provides a major mechanism to combat them by preventing and reducing illicit gains from crime and corruption.

As crime and corruption are major obstacles to development, GPML is relevant not just to achieving SDGs 16.4 and 16.5, but also to achieving the SDGs agenda in general. Hence, the evaluation finds the GPML to be in robust alignment with the SDGs.<sup>7</sup>

3. To what extent have gender and human rights principles been integrated into the design and implementation of GPML? To what extent have these principles for inclusion of men, women and marginalized groups into programme activities been mainstreamed?
  - While GPML is critical to promoting gender and human rights (e.g., combatting human trafficking and exploitation), its project design does not explicitly integrate gender and human rights principles and targets.

Project documents and stakeholder consultations indicated that the GPML did not explicitly take into account any gender or human rights consideration at the design stage. This is consistent with what other evaluations have found. For example, the Final Independent Project Evaluation of the Activities Conducted in the Mekong Region under the GPML 2011-2016 noted that “the GPML programme does not have a focus on HRG in Project design, implementation or reporting, beyond ensuring, to the extent possible, a balance in participation in training initiatives.”

**This was corroborated at three different levels:**

The **institutional/cultural contexts** in project design were not fully alert to gender or human rights mainstreaming as many of the key stakeholders thought of the programme as gender-neutral. From this perspective, a main constraint faced by GPML in considering gender and HR issues is the technical focus of its work which means that it is difficult for stakeholders to take account of the human dimensions of money laundering. Further, the distinction between predicate offences and connected money flows seems to be blurry, but is used by some stakeholders to explain why a HRG

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<sup>7</sup> Note, however, that this does not mean that GPML is necessarily considering the SDG framework as a whole when designing and implementing projects. SDG 16.4 and 16.5 are of programme’s primary concern.

analysis may not be relevant in this context. Other stakeholders indicated that AML/CFT is already complex enough and incorporating HRG dimensions would add an avoidable, extra layer of complexity. Some also point out to a lack of research unpacking the connections between AML/CFT and HRG issues that could serve as guide to mainstreaming these issues at the design stage.

In contrast, other interviewees challenged the view that Illicit Financial Flows (IFF) can be disconnected from the predicate offences, and they called for a deeper reflection to make human face of the AML/CFT more visible. They felt that AML/CFT is far from being gender neutral, and that IFF affect men and women differently (e.g., human trafficking).

**Participation of stakeholders in design:** Desk review did not suggest that the design of the programme followed an inclusive and participatory approach. The project could have, for example, benefited by including human rights and gender experts, who could have helped ensuring that HRG issues were adequately considered. For example, issues such as how corruption is experienced and propagated by different genders, and about the importance of those differences could have been better explored.

The programme similarly does not promote coordination and knowledge sharing with scholars, academia or civil society organizations with an interest in exploring the substantive links between money laundering and gender/human rights issues. Even those of its components that encourage the creation of networks do not include efforts to partner with HRG organizations (e.g., Institutional Mechanism for the Advancement of Women), Human Rights Departments, or specialized UN agencies or programmes such as UN Women.

The **intervention theory of the GPML, including progress and results reports**, does not address HRG issues beyond (as already mentioned) minimal sex disaggregation in some of the trainings. Further sex disaggregation could have shed a more substantive light into the connections between AML and HRG. For example, as mentioned in Table 10, GPML training and mentorship has led to increases in processing suspicious transaction reports (STRs) and prosecutions. However, in the absence of gender disaggregated data on people involved in these prosecutions, it is difficult to establish how power structures impact individuals' (women and men) ability to gain positions that give them the opportunity to engage in corrupt transactions, and how that might be relevant to fighting such corrupt transactions.

Overall, the evaluation notes that while the achievement of objectives and outcomes by the GPML directly feed into the success of UNODC's agenda on promoting gender and human rights, the programme could do a much better at addressing these issues by conducting and/or incorporating research in project design that specifically addresses these issues.

## ***Effectiveness***

4. To what extent has the GPML achieved or is likely to achieve its objectives and expected outcomes? How well do the organizational and communication structure employed by the GPML contribute to fulfil the mandate of the GPML?
  - GPML has largely been successful in achieving its stated outcomes. While it is hard to quantify the extent to which the project has contributed to the achievement of objectives (i.e., impacts), given the multiplicity of players in the field, it is fair to say that the project made a substantial contribution.

As mentioned in the methodology section, the evaluation team revised the project’s results framework ([Annex III](#)) to be more evaluable in terms of outcomes. Chart 10 provides a summary of (major) expected and actual outcomes. It also mentions the outputs that contributed to achievement of these outcomes. Note that the 2011 mid-term evaluation is used as a baseline for comparison of progress.

**Chart 10. Expected and actual outcomes**

Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
<b>Overall Project Objective: Assisted States build effective legal, regulatory and law enforcement capacity in compliance with anti-money laundering/ countering the financing of terrorism (AML/CFT) worldwide-accepted standards</b>			
<b>Specific Objective 1: Legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector aware of the negative economic and social impact of money-laundering and the financing of terrorism.</b>			
AML/CFT policies and institutional frameworks, and possible links with existing anti-corruption, good governance and anti-terrorism policies reviewed and developed.	AML/CFT regulatory and supervisory frameworks developed and implemented by financial and supervisory authorities and the private sector using UNODC-provided information or services of mentors.	According to the Global Money Laundering and Terrorist Financing Threat Assessment Report (FATF, 2010), more than 180 jurisdictions are members of the FATF or FSRBs. These countries either already have or are in the process of adopting laws that take into account the model laws. While FATF is the primary driver on legislations and policy frameworks, GPML (and other international organizations such as IMF and World Bank) contribute by providing technical assistance).	According to the 2016 FATF annual report, most of the 194 countries surveyed by it have adopted legislation against money laundering and criminalized “terrorist financing and implement targeted financing sanctions in accordance with the FATF Standards <sup>8</sup> ” Further, a review by the US Bureau for International Narcotics and Law Enforcement Affairs ( <a href="#">Annex VII</a> ) confirms this. According to the project documents, GPML has provided legal, policy, institutional and operational assistance to over 85 countries in Africa, Asia, Latin America and the Pacific regions. In 2016 alone, 75 member states, including some of the most fragile states, received

<sup>8</sup> <http://www.fatf-gafi.org/media/fatf/documents/reports/FATF-annual-report-2015-2016.pdf>

Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
			assistance on review and development of AML/CFT legislation and implementation of the operational practices. By the end of 2015, 88 Member States had adopted AML/CFT policies in line with GPML's recommendations.
Reports to the Commission on Narcotic Drugs (CND) on the progress made by Member States to comply with the requirements of the UN Plan of Action to counter money laundering provided.	CND adopts resolutions taking into account reports.	CND dealt with AML at all of its sessions between 2005-2010, with the exception of 2006. In most years there was a Secretary-General's report on money laundering, and there was clear evidence that when a report was presented, it was taken into account. The clearest case was the Report of the meeting of the open-ended intergovernmental expert working group on countering money-laundering and promoting judicial cooperation, held in Vienna from 30 June to 1 July 2008 (UNODC/CND/2008/WG.2/3). The working group was given a Secretariat note (UNODC/CND/2008/WG.2/2), drafted by GPML, that made recommendations. A comparison of the recommendations proposed and those adopted by the working group shows that of 35 recommendations adopted, 20 were the same or similar to those proposed by the Secretariat. Only four of the Secretariat recommendations were not included in those adopted.	In 2015, with technical assistance from GPML, CND adopted Resolution 58/6 on "strengthening international cooperation in preventing and combating illicit financial flows linked to drug trafficking, from the anti-money-laundering perspective."  UN General Assembly adopted resolution 66/177 in 2011 on "strengthening international cooperation in combating the harmful effects of illicit financial flows resulting from criminal activities, in which the Assembly noted with interest the work undertaken in countering money-laundering within the framework of relevant specialized regional and international bodies."
Basic information on money laundering provided and the proceeds of crime through the dissemination of the computer-based	Increase in the number of persons using the CBT/eLearning.	Note: CBT moved over to the new eLearning platform in 2014/15.  In 2009, 46 CBT centers served unknown number of users. However, most of the surveyed beneficiaries were either not aware	According to the latest reports, 13 AML modules on the eLearning platform had 774 registered users from 44 countries. These users had

Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
training (CBT) or eLearning programme identified.		of CBT (55%), had not used it (27%) or had not found it helpful (5%). Only 14% percent found it useful.	collectively taken the test and passed 1052 modules. Note: All 13 modules are available in English alone.
Studies on the vulnerability of informal economies to money laundering and the financing of terrorism carried out.	Studies are used by targeted users.	GPML documents were used by the World Bank, International Monetary Fund, the Security Council Counter-Terrorism Committee and FATF. The World Bank publication, Politically Exposed Persons: Preventive Measures for the Banking Sector (2010) included the then head of the GPML as one of the authors. GPML staff also contributed to the CTITF Working Group Report, Tackling the Financing of Terrorism, issued as a joint product of the World Bank, the IMF and UNODC.	GPML does not collect specific data on the use of its studies, although interviews and the survey confirmed that beneficiaries found GPML publications useful.
<b>Specific Objective 2: Knowledge and expertise to combat money-laundering and the financing of terrorism effectively applied by legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector</b>			
Training on AML/CFT legislation.	AML/CFT Legislation developed by trained legislators and legislative personnel.	Both the interviews and survey results from the 2011 Evaluation suggested that the beneficiaries learned and applied a wide variety of skills.	As training is a core component of GPML, it is covered in detail below.
Training courses, expert groups, mentoring.	Target groups participating in the projects activities have a higher level of awareness on germane aspects of money laundering and the financing of terrorism.	The interviewees from the 2011 Evaluation stated that the GPML activities had significantly raised awareness on money laundering issues in their countries. In some cases, they acknowledged that prior to GPML they had no awareness at all on the issue. With significant contributions from mentors' efforts, these countries had not only increased awareness, but also had built a national consensus significant	As above.

Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
		enough to pass new legislation, set up FIUs, and begin pursuing money laundering cases.	
AML/CFT model legislation prepared; Tailored-made advisory services and other technical inputs relevant to the implementation of international AML/CFT standards; Number of review of national AML/CFT national legislation; Number of legal advisory and needs assessment activities and legislative reviews successfully carried out.	Model AML/CFT legislation adopted by legislative bodies in member states.	In 2004, about 160 countries (83% of the world) <sup>9</sup> had adopted national legislation. By 2009, this number had increased to about 180 (93%), <sup>10</sup> and many of the remainder countries were in the process of adopting AML/CFT legislation.	According to the FATF and US reports mentioned earlier, most countries now have legislation in place. The issues and discussions now are centered on their execution and effectiveness.
Expert group meetings on specialized and complex aspects of AML/CFT issues conducted.	AML/CFT strategies and policies developed by criminal justice officials who participated in or read the reports of the expert group meetings and integrated into relevant strategies and policies.	In 2010, various law enforcement agencies were just beginning to implement new AML laws. In most cases, there was very limited evidence on the implementation of any special AML strategies and policies on country level, with some notable exceptions where country counterparts had formulated a strategy for implementing recently passed AML laws and making their FIU more operational.	According to the FATF and US reports mentioned earlier, most countries now have AML/CFT strategies and policies in place. The issues and discussions now are centered on their execution and effectiveness.
Advice and information/guidelines on establishing an FIU, conducting investigations, and prosecuting AML/CFT cases; Training programmes for judges, prosecutors, law enforcement and	FIU established, financial investigations conducted and AML/CFT cases prosecuted with international standards applied by	The Egmont group had 101 FIUs as its members in 2005, which increased to 124 by June 2010. While it is difficult to claim causality, GPML contributed to establishing FIUs and getting them operational. In some cases, GPML mentors helped FIUs to obtain membership of the Egmont group. A number of countries with GPML assistance had advanced to the point	Currently, the Egmont group has 154 FIUs as its members. <sup>11</sup> While actual investigation and prosecution of AML/CFT continues to be an issue in many jurisdictions, some progress on this front is visible. According to the 2015-16 annual

<sup>9</sup> The World Drug Problem, Fifth report of the Executive Director, Addendum, Countering Money Laundering, (E/CN.7/2008/2/Add.6), 17 December 2007.

<sup>10</sup> [http://www.fatf-gafi.org/document/51/0,3343,en\\_32250379\\_32237202\\_45724403\\_1\\_1\\_1\\_1.00.html](http://www.fatf-gafi.org/document/51/0,3343,en_32250379_32237202_45724403_1_1_1_1.00.html)

<sup>11</sup> <https://www.egmontgroup.org/en/content/about>



Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
<p>FIU officials trained on effective prevention, detection and criminalization of money laundering and the financing of terrorism; Content of specialized services and technical assistance programmes to ensure that they adequately meet the specific needs of the recipient States reviewed on an ongoing basis.</p>	<p>criminal justice officials.</p>	<p>of investigation and prosecution of AML/CFT cases, though actual statistics on number of cases investigated and prosecuted were not available. Overall, while most countries had already set up FIUs that meet international standards, a vast majority of them are yet to develop fully functional AML/CFT regimes. In general, the number of cases identified by FIUs in the countries where GPML operated remained very low, sometimes without any AML/CFT cases prosecuted at the time.</p>	<p>report<sup>12</sup> of the Egmont group, the number of requests exchanged among its members increased from about 15000 in 2011 to 25000 in 2015, and the number of suspicious transactions reported increased from about 6 million to more than 9 million over the same period. Similarly, GPML documents showed that 355 cases for money laundering were brought to light in Southern Africa in 2016 alone. Of these, 237 cases led to seizures, 94 cases in which assets worth \$23 million were forfeited.</p>
<p>Advice and information/guidelines on preventive measures for regulatory and supervisory authorities and private sector firms.</p>	<p>AML/CFT preventive measures applied by regulatory and supervisory authorities and the private sector.</p>	<p>There were few instances where GPML assistance led to the application of AML/CFT preventive measures in the private sector, though GPML had initiated involvement with the private sector (financial institutions). In one example, GPML worked with business associations to raise awareness. In another instance, private sector and regulatory institutions were involved in discussions on new AML/CFT law. However, overall GPML's focus during the period under review was on supporting the drafting of effective AML/CFT legislation and on the creation of functional FIUs.</p>	<p>The interviewees, especially at the FATF Private Sector Forum in Vienna in March 2017, acknowledged that GPML could play a significant role in providing technical assistance to banks, financial institutions and other private sector firms, but also suggested that it had not yet done so in a significant manner. An exception being the Programme on Responsible and Secure Business developed by the office in Colombia, which did not appear to have substantive links with GPML HQ (see also the chapter on lessons learned). Several interviewees also noted that this was</p>

<sup>12</sup> <https://egmontgroup.org/en/document-library/10>

Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
			not part of its perceived mandate.
<p>Training materials and courses based on assessment of need and sustainability; Sustainable training programmes on detection, prevention and criminalization of money-laundering and the financing of terrorism developed; Mentors /advisors posted in the field providing continuous policy advice, on-the-job training, and other technical support to target groups.</p>	<p>Member states are self-reliant in training their regulatory, supervisory, criminal justice, and private sector professionals.</p>	<p>Some countries had not just become self-reliant in training their professionals, but had also started training their neighboring countries. However, overall, a need for more advanced training with a greater focus on enforcement issues and based on the train-the-trainers model was widely acknowledged. Interviews also suggested that while countries working together in regional groups such as the FSRBs or ARINSA benefitted from joint training, such training needed to be more demand-driven, rather than supply-driven.</p>	<p>There are some indications on some countries becoming self-reliant in training their officials though no systematic data. Based on the interviews, the evaluation notes that in West Africa, 80 practitioners in financial investigation are now considered local trainers and these experts have in turn trained 900 national officers. Furthermore, training capacity is now significant in Kazakhstan, with the country now self-reliant as well as a regional training hub. At the regional level, networks like ARINSA and ARIN-AP are taking on a larger role in capacity development activities.</p>
<p><b>Specific Objective 3: AML/CFT coordination and cooperation <i>increased</i> among Member States, International Organizations and AML/CFT regional bodies.</b></p>			
<p>Organizing technical assistance coordination meetings at different levels.</p>	<p>Increased number of technical assistance coordination meetings, and results thereof.</p>	<p>GPML mentors participated in technical coordination meetings organized by FSRBs like the APG, at the invitation of those bodies. Partner organizations and other providers of technical assistance confirmed that mentors put a focus on sharing information on their activities in a country and region, to enable cooperation (e.g. through newsletters, bilateral meetings), and several partners stated that they consider this information when designing their own activities and selecting focus countries. GPML also organized annual meetings in Vienna, where mentors and GPML staff met to coordinate</p>	<p>Networks such as ARINSA, ARINWA and ARIN-AP promoted by GPML have strongly emerged as a best practice for sustainability. These networks bring together practitioners for exchanging valuable information with the aim of promoting collaboration towards assets forfeiture. ARINSA also has an on-line platform fully functional for</p>

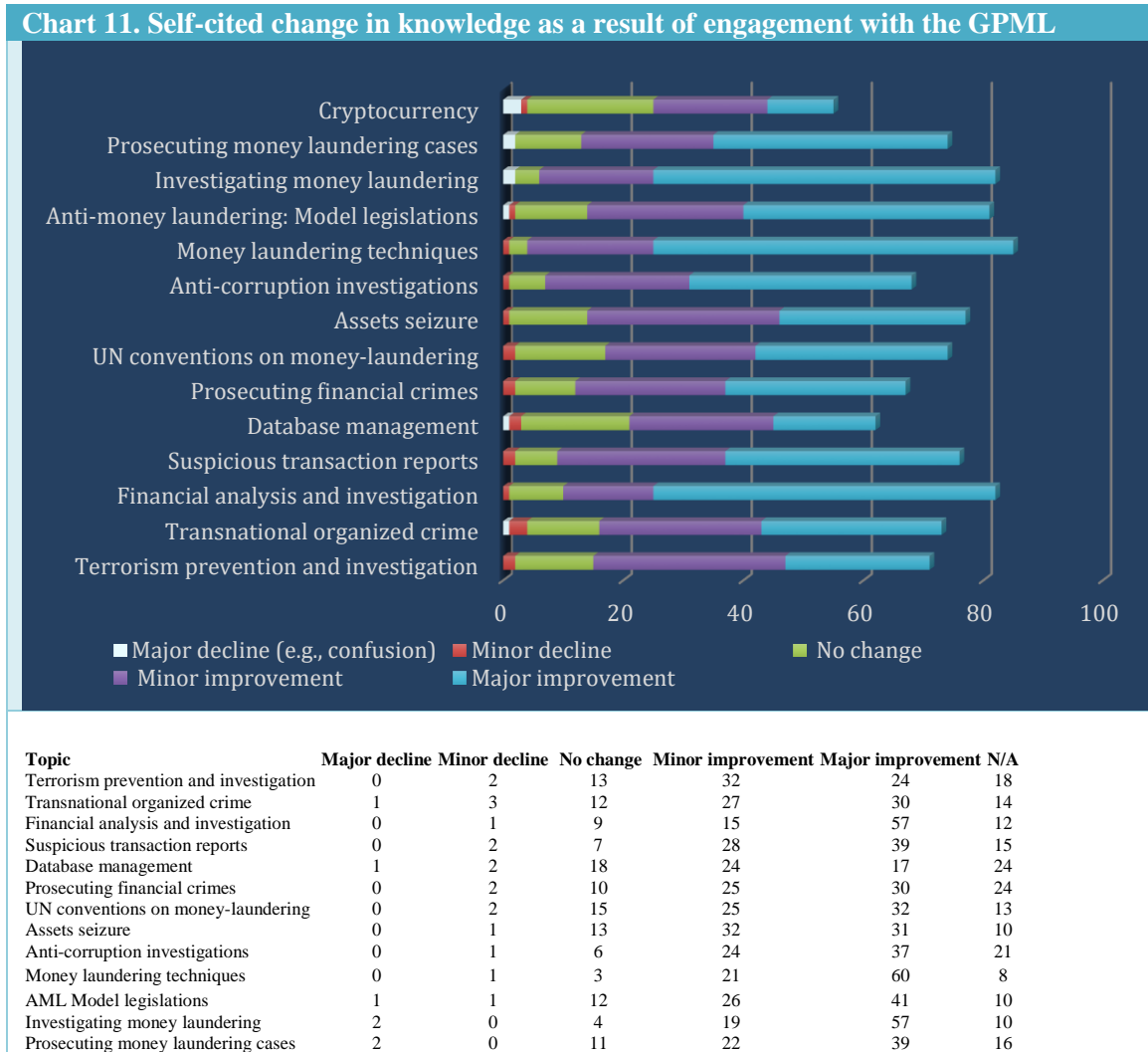
Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
		technical assistance internally. Most coordination was informal rather than through formal meetings. There was also a perceived lack of sufficient coordination between the activities of GPML and the World Bank and IMF, as well as of other donors working on individual technical assistance activities in the field of AML/CFT.	exchanging information.
UNODC tools and services on international cooperation, mutual legal assistance, law enforcement, anti-organized crime, good governance and counterterrorism promoted and disseminated.	Exchange of information and AML/CFT coordination among international organizations improved.	There was some evidence of coordination between GPML and the World Bank in particular, because of the two joint mentors, who were paid by and report to both organizations. However, cooperation between GPML and the World Bank was mostly activity-based and rather informal. Cooperation with the IMF was even more informal. With regard to the Egmont Group, GPML participated in or provided input to several working groups. GPML was also an observer to all FSRBs and to FATF. In connection with Interpol and CTITF, GPML participated in the working group on proceeds of crime.	Due to funding constraints at the World Bank and IMF, the number of joint activities seem to have gone down further, while GPML continues to engage with the FATF, FSRBs & the Egmont group as before.
Input to proposed joint projects.	Increased number of joint projects and initiatives with the FATF and other standard setters.	Some joint trainings were conducted with partner organizations, including IMF, World Bank, the Organization for Security and Cooperation in Europe (OSCE), the Egmont Group, Interpol and the United States INL between 2004 and 2010. There was some evidence that GPML work had affected how the FATF developed and modified its recommendations.	GPML is providing input to FATF's Training and Research Institute (TREIN) in Busan, South Korea. TREIN was inaugurated in September 2016.
Inputs to the development of new international cooperation mechanisms provided.	New mechanisms developed for facilitating international cooperation that use project outputs.	The GPML team was involved in the development of at least three new mechanisms: ARINSA in Southern Africa, its equivalent in South America and a new financial investigations course. goAML, developed by UNODC ITS, provided an information technology (IT) solution for FIUs. Although limited to FIUs with sufficient resources for maintenance, the costs are considerably lower than of comparable commercial software solutions and since 2004 goAML	ARINSA has a more structured existence, including a secretariat with deep involvement of GPML staff, which bodes well for its long-term sustainability. goAML has two versions now. Its high-end enterprise version comes with premium features, but at a higher price tag. However, goAML is now run independently of

Outputs	Expected outcomes	Baseline information (2011 Evaluation)	Actual accomplishments
		had been installed in eight countries in various regions.	GPML, and as of the end of the evaluation period, is no longer jointly promoted by GPML.
Collaboration with the Financial Action Task Force (FATF) and other standard setters and technical assistance (TA) providers increased.	Increased number of inputs to FATF and other standard setters' AML/CFT papers, reports and studies that are used by the FATF and other Standard setters.	FSRBs recommended the use of documents produced by the GPML team and that these were also downloaded from the GPML website. However, it was not clear who was downloading these documents and for what use.	FATF notes that it reaches out to GPML for input to its Policy Development Group on two topics: information exchange and financial inclusion. Further, GPML is an observer organization to the FATF, and attends and provides substantive input at most of the FATF Working Group meetings, including at Global Network Coordination Group (GNCG); Risks, Trends and Methods Group (RTMG); International Cooperation Review Group (ICRG); and Policy Development Group (PDG).
Input to the FSRBs.	The FATF-Style Regional Bodies (FSRBs) as the platforms for technical assistance coordination utilized.	Adequate information on this was not available in 2011.	There is evidence of input to the FSRBs through the mentors. For example, the Central Africa mentor is active in GABAC and the Pacific mentor has been active in APG.
Substantive inputs to the work and reporting requirements of the working group on "Tackling the Financing of Terrorism" provided.	Working group on "Tackling the Financing of Terrorism" uses inputs.	GPML was called upon to be one of the authors of the CTITF Working Group report on Tackling the Financing of Terrorism issued in 2009. Whenever the working group met, it expected GPML staff to participate.	No change (over baseline).
Substantive inputs to the work and reporting requirements of the CTITF" provided.	Increased use by CTITF of inputs provided	The formal representation of UNODC on the CTITF is provided by the Terrorism Prevention Branch. GPML had participated whenever the issue of terrorist financing had been taken up.	No change (over baseline).

As is evident from the comparative chart above, GPML has made substantial progress on all of its stated outcomes. While the programme did not have specific targets for each outcome, a clear progress over baseline information from 2011 evaluation is evident. Training and capacity building form the backbone of the work carried out by the GPML. Given its criticality to achievement of the project’s objectives and outcomes, the evaluation conducted an online survey of trainees in four languages (English, French, Spanish and Russian). The results from this survey were triangulated against data collected from other sources, which included analysis of feedback forms submitted at the training sessions, stakeholder interviews over the phone and in person, and focus group discussions.

A vast majority of the stakeholders consulted found the training to be very helpful to their work. The evaluation team randomly reviewed the feedback forms and tests administered at recent trainings organized by the GPML, and this review also indicated that trainees found the training to be useful. For example, 96% of the participants at the Zanzibar workshop reported learning about new ways in which drug trafficking networks launder their funds, and 95% identified new vulnerabilities in their jurisdiction’s ability to detect, investigate and disrupt money. Similarly, self-reported improvement in participants’ knowledge at the Jamaica workshop was 77% (2.68 to 4.72 pre- and post-test scores).

**Chart 11. Self-cited change in knowledge as a result of engagement with the GPML**



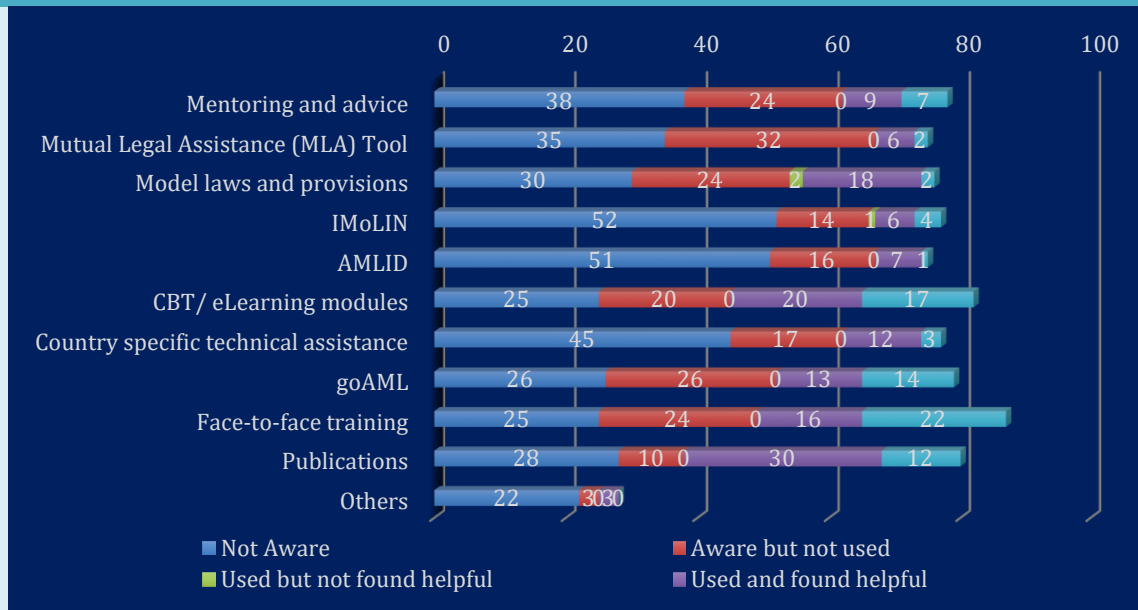
Cryptocurrency	3	1	21	19	11	31
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**Source: The survey of trainees**

This was independently verified by the evaluation team via interviews, focused group discussions and the survey. Chart 11 captures responses from the survey. As can be noted from Chart 11, survey respondents reported significant change in their knowledge on a wide variety of topics ranging from money laundering detection and UN Conventions to cryptocurrency and terrorism prevention. The interviewees were especially satisfied with training on the regular “bread and butter” topics like investigation of AML cases.

Unlike in the 2011 Evaluation survey, respondents indicated low awareness of the GPML’s flagship mentoring programme (it should be noted, however, that most interviewees had far better awareness on mentors and significance of their work). This finding partially indicated that the trainees were now more geographically spread out, which was especially true of eLearning users. GPML also organized several training events in countries such as Moldova and Cyprus that do not have mentors. To the extent that it is true, it reflects a success for the programme in that the programme has a broader reach now than in 2010. While it does not appear to be a concern at the moment (for the reasons outlined before), GPML may need to be on the lookout for any potential dilution in awareness on mentoring as a result of reduction in activity in the regions served by the mentors. GPML may, however, need to be a little concerned about low awareness and use of its website IMoLIN.

**Chart 12. GPML Products: Perceived usefulness**



	Not Aware	Aware but not used	Used but not found helpful	Used and found helpful	Used and found very helpful
Mentoring and advice	38	24	0	9	7
Mutual Legal Assistance Tool	35	32	0	6	2
Model laws and provisions	30	24	2	18	2
IMoLIN	52	14	1	6	4
AMLID	51	16	0	7	1
CBT/ eLearning modules	25	20	0	20	17
Country specific assistance	45	17	0	12	3

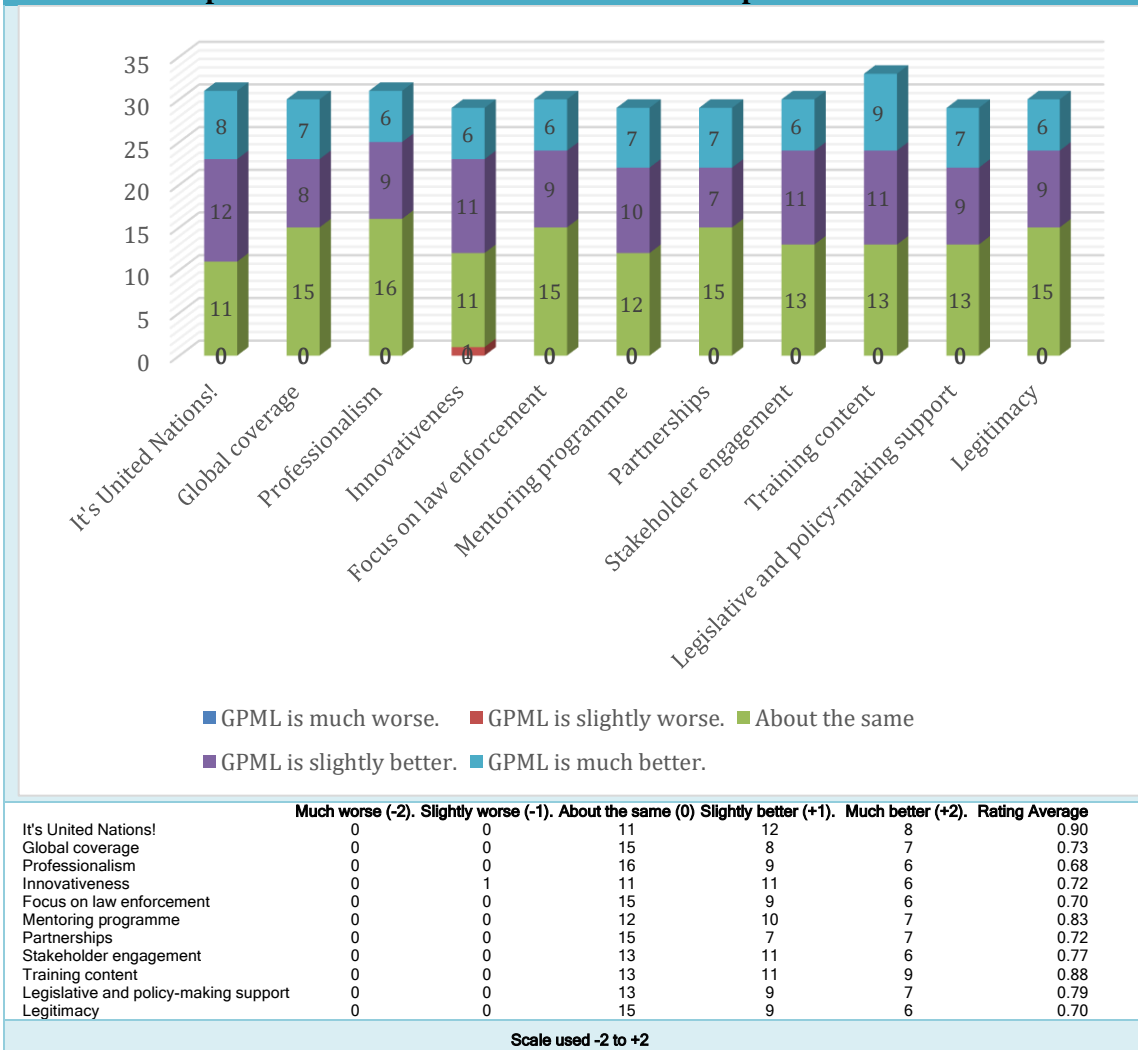
goAML	26	26	0	13	14
Face-to-face training	25	24	0	16	22
Publications	28	10	0	30	12
Others	22	3	0	3	0

**Source: The survey of trainees**

Chart 12 above captures the perception on usefulness of various products that surveyed trainees had used. It is clear from their responses that while low awareness on some products could potentially be an issue, but satisfaction with products used was not in question at all. In fact, their responses indicated a high degree of satisfaction with all the products that the trainees were familiar with.

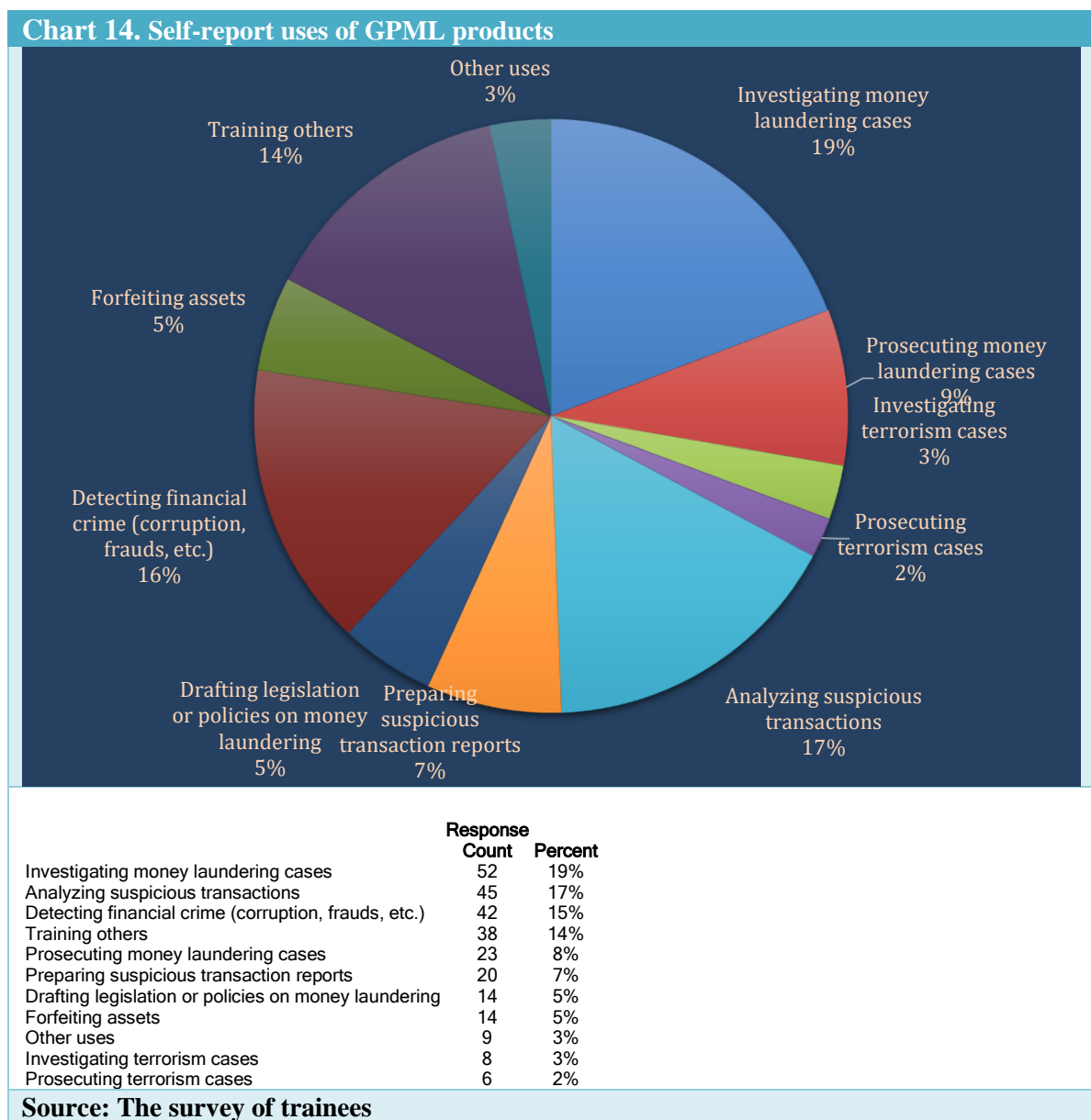
The survey respondents were asked to rate GPML in comparison with other providers of technical assistance on anti-money laundering (e.g., FATF, Egmont group, IMF, United States INL, etc.). Chart 13 above summarizes their opinions. As can be easily discerned from the chart, respondents did not rate GPML unfavorably on any of the dimensions used. In fact, on a scale of -2 to +2, the average rating on most dimensions is close to 1; this indicates that respondents perceived GPML to be slightly better than other TA providers on dimensions ranging from training content and innovativeness to stakeholder engagement and mentoring.

**Chart 13. Comparison with the other technical assistance providers**



**Source: The survey of trainees**

For a training to make a difference and contribute to larger impacts, however, it should be used on a regular basis. Therefore, the survey asked the trainees if and how they had used their newly acquired knowledge. Respondents, on an average, listed 2.55 ways that they had used their training. Chart 14 depicts major ways in which the training had been put to use. Investigating money laundering cases (19%), analyzing suspicious transaction reports (17%), detecting financial crime (16%), and training others (14%) were listed as the top uses.







Stakeholder consultations in interviews and focus group discussions broadly confirmed the above feedback provided by the survey respondents on the value of technical assistance received. The evaluation also noted that the interviews revealed the innovative character of some of the trainings. Important innovations go beyond covering new topics (such as cryptocurrencies) to include more integrated trainings better informed by recent developments in law enforcement. For example, GPML runs ‘financial disruption’ workshops, which seek to inculcate the need to understand that success is about more than confiscations and convictions. By focusing on the points of vulnerability, instead, it enables disruption planning. Approximate ten such workshops have been organized since 2016. In addition, the evaluation notes two linked workshops on wildlife trafficking (one in East Asia and one in the Mekong region) which used an integrated approach to the problems.

Similarly, in Colombia the trainings had three aspects that increased their effectiveness (as well as efficiency). First, trainings follow an incremental logic with learning cycles that built on each other. A quote from one prosecutor illustrates this well “It is clear there is a coordinated strategy about the theme tackled (in the training). It is an integrated process that follows planned cycles. Trainings are well planned and analytical”. Second, evidence suggests that trainings are reaching a critical mass of the targeted audience. For example, the Training-of-Trainers programme design for the National Tax and Customs Office (DIAN as per acronym in Spanish) is planned to reach 1700 civil servants in the organisation. This includes all 1,200 *oficiales de fiscalización* (those in charge of AML). Lastly, to ensure that the training is useful and effective, the programme is piloting the Kirkpatrick model for over a year now with the basic-intermediate training courses on AML. They intend to consult a critical mass of participants 6 months after the training to find out about changes in behaviours and institutional transformations related to the trainings.

In addition to technical assistance for legislation and capacity development, GPML also provides a number of other important tools and products on AML/CFT. Charts 17 provides information on GPML’s IMoLIN website. The website started in 1998 had a total of 22 downloads in 2005, which had grown to 149 in 2011, and 1469 in 2016 (Chart 17). These numbers suggest that awareness and use of website and GPML documents continues to be low, which is an area of somewhat concern. Similarly, eLearning currently has around 900 users, also needs to receive greater attention from the programme managers (More on that in the next section on efficiency).

Chart 17. IMoLIN website: Visitors and downloads			
IMoLIN:	2005	2011	2016
Number of unique visitors		27238	136923
Number of visits		43111	212342
Number of downloads	22	149	1469
<b>Downloads by category:</b>			
UN conventions and the international standards on AML		32.60%	
AML/CFT: UN's response		4.50%	
FATF 40 Recommendations		1.10%	
Model Laws		7.50%	
Newsletters		6.60%	
Specific laws		47.70%	

While stakeholders were generally very satisfied about the technical assistance received by them, some of them in Africa suggested that GPML may have too much of a focus on operational matters to the detriment of a more strategic approach.

The evaluation also found that a more strategic approach was also potentially hampered by organizational matters within GPML and its place within UNODC. The evaluation identified five areas of potential issues in that respect. First, the team is small and includes several P4s but no P5-positions; stakeholders within and outside the UNODC noted that this issue in the hierarchy can lead to confusion. In addition, there is no official within GPML who commands a high enough position to match those of counterparties in other organizations in the AML/CFT regime. This can affect GPML's potential collaborations. Further, the GPML team in Vienna has a regional and linguistic expertise associated mostly (though not exclusively) with Eastern Europe, Central Asia and Sub-Saharan Africa; it is possible that activities and practices developed elsewhere fail to be at the forefront of planning in Vienna. Second, GPML appears to make extensive use of consultants. This is not surprising in light of its budgetary status but does raise some question among stakeholders who are unclear as to whether these consultants are representing the UNODC through their activities or a particular project. GPML could provide more clarity as to the status of different professionals associated with its work. Third, GPML does not receive funds from the regular budget (to an even more acute degree than many other parts of UNODC, which itself receives a low level of the regular budget) which means that staff positions only ever have guaranteed funding in the short term; this is an issue for long term strategic planning. Fourth, there is no standardized or regular system in place to coordinate between the mentors and the Vienna office or among the mentors. Considering this is a flagship and acclaimed programme for GPML, this shows the high calibre of the mentors of the programme but there are opportunities to do better in terms of sharing know-how and serving beneficiaries across regions by taking advantage of the different areas of the specialized expertise of the various mentors. Fifth, there is no standard system of collaborating with the regional offices more generally, and the way in which the programme is integrated with other UNODC activities varies significantly from country to country. The evaluation notes a good working system in Colombia but synergies appear to be missed elsewhere. More coordination in fund-raising among the Vienna team and the regional offices would be useful in that respect, though the evaluation notes that this is not unique to GPML within UNODC.

Taking all of the above information into account, the evaluation finds that GPML has made significant strides in achieving the intended outcomes and shows a significant promise of achieving its intended objectives (to be discussed in the impact section). There are some areas that require greater attention of the management for them to be truly effective. Similarly, there is also significant scope for improving the monitoring system by establishing an ongoing system of data collection on outcomes and impacts, which should be done in partnership with national counterparts to better demonstrate its results to various stakeholders.

Overall, GPML is making an effective contribution to capacity building in targeted countries, and has the potential to deliver at and even higher level.

5. What measures have been taken during planning and implementation to ensure that human rights and gender (HRG) aspects were mainstreamed? How has the organizational and governance structure of GPML facilitated HRG parity?
  - The GPML appears to have made concerted efforts to ensure that there was a balanced gender participation in its trainings and other capacity building activities. Beyond this, the programme does not have any specific focus on HRG during planning or implementation.

The evaluation noticed a relatively high proportion of women in almost all of the training for which data was available. Only in one case was the female representation in these trainings low (below 10%). While it is not clear to what extent this is attributable to conscious decisions by the GPML or merely representative of trainee population in countries these trainings were arranged, this is significant progress that GPML would do well to continue striving for in its future capacity development activities.

Beyond counting the number of men and women beneficiaries in some of its capacity development workshops, GPML does not appear to have a specific focus on gender or human rights in any of its activities and strategies implemented. The backbone of the GPML, with some exceptions, focuses on getting the countries aligned with FATF requirements. While some FATF recommendations explicitly mention how countries should consider human rights while implementing AML/CFT measures (recommendations 6, 7 and 8), in practice, these recommendations are considered peripheral to the work on AML/CFT. For example, protection of privacy and data are important human right considerations. Although GPML has some capacity building activities (e.g., in Mekong) that discuss the right to privacy and the principle of proportionality, neither FIUs nor the GPML have paid adequate attention to implementing global standards on this issue. Similarly, on the issue of cross-border collaboration, the emphasis of GPML strategies is almost always on efficient flow of information, but not so much on the necessary steps for data protection. These activities, in general, did not seem to be adequately aware of human rights consequences associated with weakening data protection and privacy.

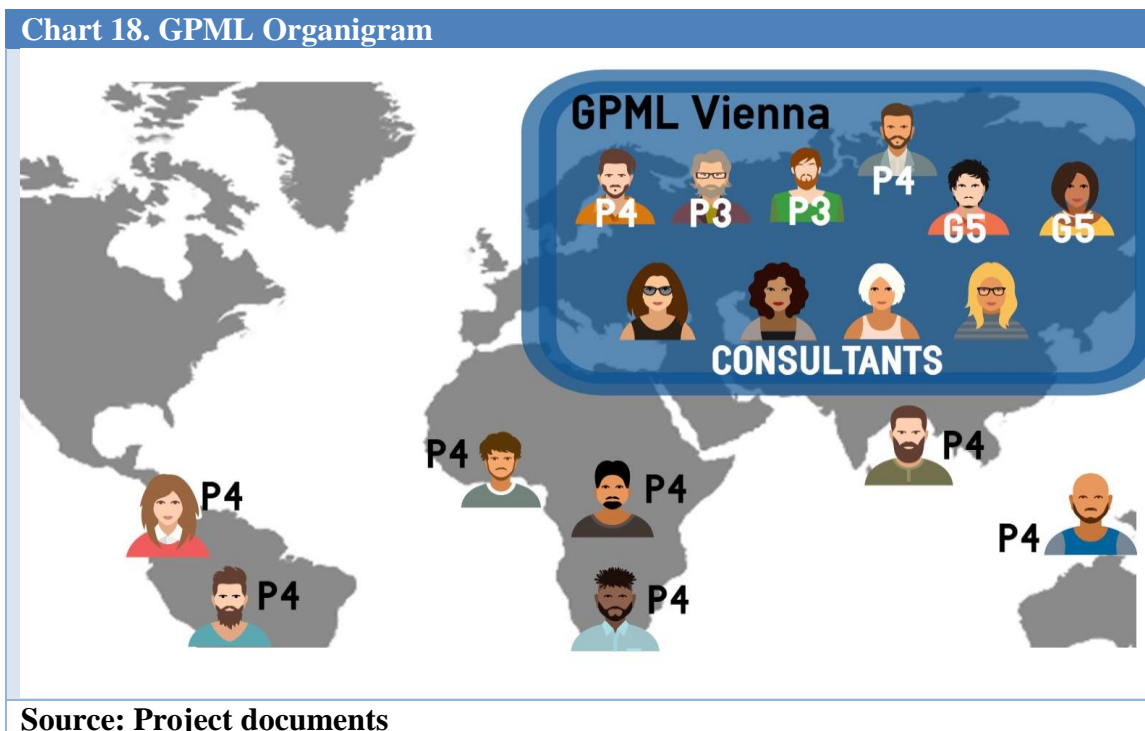
There are no gender considerations explicitly mentioned under the FATF recommendations. However, key stakeholders consider that the risk-based approach promoted in the framework could factor in gender, as from a criminology perspective, women generally pose a lower risk. As the custodian of global criminal statistics, UNODC through GPML, can make specific contributions in developing a risk-based model that account for these differences. A HRG focal point within the GPML may be necessary to enable higher success in identifying gaps in research and/or potential key substantive issues relating to HRG within the AML/CFT field.

In fact, GPML could also benefit from greater gender parity within its own ranks. While the programme employs several female consultants, only one of its nine P4 staff members is a woman (Chart 18). This is far from the institutional commitment of ensuring parity at the P4 levels and above as indicated in the UNSWAP and different General Assemblies resolutions.<sup>13</sup> Although, in all fairness, it must be added that the GPML in the past has had greater gender parity (including female programme manager at the time of evaluation in 2010), and has been good faith efforts at recruiting more female members.

Overall, the evaluation notes a mixed record of GPML in dealing with HRG issues. While GPML has made substantial progress since previous evaluation in addressing these issues, there are significant opportunities to do even more.

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<sup>13</sup> General Assembly resolutions (65/191, 64/141) have called for urgent action to meet the goal of 50/50 gender balance in the UN system, especially at senior and policymaking levels



## Efficiency

6. What measures have been taken during the planning and implementation of the GPML to ensure that resources are used in an efficient, transparent and accountable manner? How have UNODC systems such as Umoja affected the efficiency of the programme? Would introduction of the Full Cost Recovery considered to affect the efficiency of the programme?
- From the limited information available, it appears that the project has utilized its resources efficiently.

Efficiency, the most basic economic measure of success, concerns ratio of outputs to inputs. It involves conducting comparative cost-benefit analysis of various strategic options for delivering programme outputs and outcomes. The evaluation considered criteria relating to timely delivery of outputs and achievement of objectives, as well as alternative (i.e., counterfactual) scenarios, to determine the efficiency with which resources and inputs were converted into outputs. Further, analysis of project documents was triangulated against opinions of stakeholders consulted.

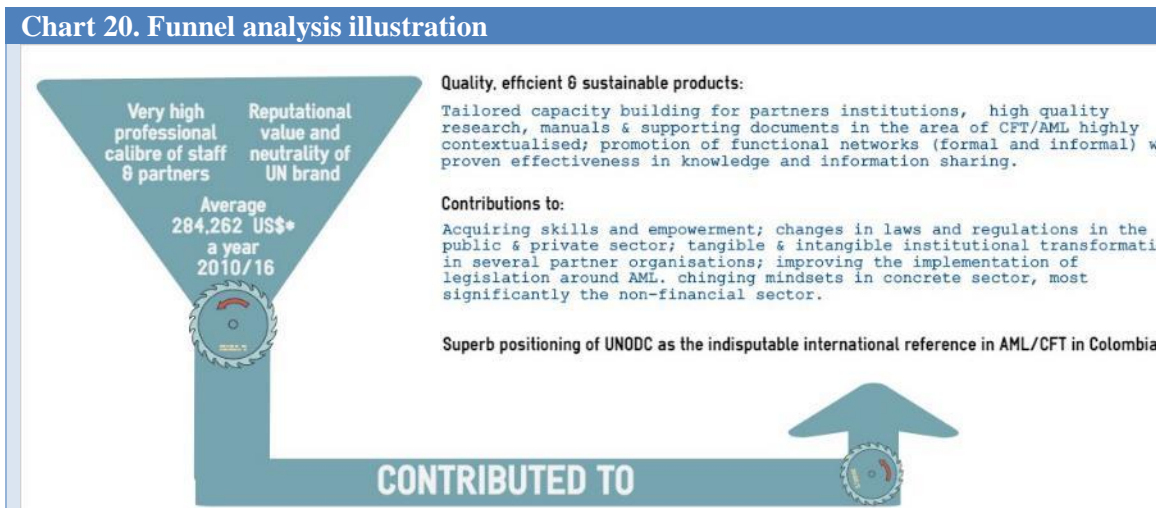
All of the project's activities appear to have been carried out on time. None of the stakeholders reported any delays in implementation. The project had a total budget and pledged contributions of US \$ 25,986,725 over a six-year period from 2011 to 2016. As Chart 19 below shows that annual expenditure on GPML activities has generally been increasing from \$2.2 million in 2005 to \$2.7 million in 2011 to \$4.8 million in 2016. GPML has especially witnessed a major increase in expenditure over last two years.

**Chart 19. Annual expenditure (2005-2016) in USD (000s)**

While the average annual expenditure for a ten-year period is around \$3.1 million, if this period is divided into two halves, the average annual expenditure for the first six years (2005-10) is \$2.6 million and for the latter six years (2011-2016) it is \$3.6 million. The increase becomes even more apparent if divided into four periods. The average annual expenditures were \$2.4 million, \$2.8 million, and \$4.3 million for 2005-07, 2008-13, and 2014-16 respectively. Thus, it is evident that the project has been successful at raising resources over last few years. While GPML has been increasingly successful at fund-raising, uncertainty over funding has been a bigger issue for the programme. As the programme is almost entirely funded from extra-budgetary resources, GPML needs to be at least as concerned about raising funds for current operations as for effective long-term planning.

Measuring efficiency in situations where much of the programme work is intangible is not an easy task. This is especially true for GPML's activities such as mentoring, building trust and relationships, and capacity development that are intangible in nature.

To exemplify how GPML's inputs translated into outputs, we developed a graphic contribution analysis applied to the programme in Colombia, where we found that the GPML has been particularly efficient. This *funnel* analysis (Chart 20) illustrates how in the case of Colombia concrete financial resources (an average of 284,262 US\$ a year), the high professional calibre of GPML staff and partners, and the reputational value of the UN brand contributed over the last six years to important outputs and outcomes. The first paragraph refers to concrete quality products. The second paragraph refers to transformations, either at the personal level (like new knowledge), at the institutional level in partner organisations, at the legislative level, or at the societal level. The third paragraph brings up a more intangible but important aspect, the positioning of UNODC in the playfield of AML in Colombia.



Elsewhere, the evaluation noticed several steps that GPML had undertaken to increase its efficiency. These included partnering with local institutions in beneficiary countries for in-kind contributions towards training arrangements (e.g., Mekong), arranging experts from countries in the region (e.g., Austrian FIU staff for training in Cyprus), embedding trainees in more advanced countries in the region (e.g., Prosecutor Placement Programme for Namibian prosecutors in South Africa), using Training-of-Trainers approach, and promoting regional networks for collaboration and capacity development (e.g., ARINSA and ARIN-AP). Additionally, GPML has taken big strides towards using eLearning for training purposes, and already has 13 modules on UNODC's eLearning platform.

It is evident from the desk review, stakeholder consultations and survey that the project utilized a Training-of-Trainers (ToT) approach at least to some degree. GPML trainings in the Mekong region, for example, as in Colombia, are structured in an incremental manner at three levels: Basic, advanced and ToT programmes. The candidates for each higher level are chosen competitively i.e. only a certain number of the best performers in basic training get to participate in the advanced trainings and only a handful of performers from the advanced training are invited to participate in train-the-trainers programme.

While GPML is known best for its mentors and mentoring, it is yet to capitalize on the opportunity to make far greater use of eLearning, especially for basic, refreshers and preparatory training in advance of more in-depth in-person workshops.

Mentoring is an effective, but relatively expensive mode of delivering capacity development and requires long-term funding commitment and careful planning so as not to overwhelm the regular work-flow of those being mentored. It needs to be complemented with other modes of delivery to the extent possible to increase its cost effectiveness, and eLearning (besides the ToT approach) is the most useful way to do so. Whenever eLearning modules are available, mentors and other GPML trainers should mandate their use before the actual in-person training. This will allow mentors/trainers to focus on more advanced concepts and avoid wasting time on basic concepts, which is important for both effectiveness and efficiency.

At its current usage level, eLearning is essentially breaking even with in-person workshops. Assuming for the sake of simplicity that each AML/CFT module on the eLearning platform cost

about \$25,000 (which is about the average price charged by the Global eLearning programme charges), and factoring in expenses for maintenance and updates, GPML's 13 modules cost about \$400,000 (ignoring overheads and cost of maintaining eLearning platform). At its current usage, this works out to roughly \$500/ user. An in-person workshop, using consultants, can be arranged for around \$15000 for 30 trainees, which works out to be about the same cost as an eLearning module per user. However, in-person workshops can be more effective at responding to trainees' specific needs and cover more advanced topics. Hence, GPML needs to take a more aggressive approach to exploiting the true potential of eLearning, which is premised on the promise of extensive use by a wide base of users.

While GPML management has used an online platform to lower the cost and time of in-house module production, this is not the most appropriate strategy available. This is also not appropriate for UNODC to attain economies of scale with respect to its in-house platform. Instead, GPML is better off engaging with the Global eLearning Programme towards attaining lower costs.

Another example of a missed opportunity for efficiency comes from creation of an online training course that have been developed specifically for the country. Stakeholders indicated this course to be of good quality and useful. It also seemed to be reaching out a significant audience. For example, it was reported by the FIU that banks and other Financial institutions have made it compulsory for their new staff in relevant positions to take this online training. However, it is not clear why this was not developed as a part of the Global eLearning Programme's p(GEP) platform or at a minimum why it has not subsequently been made available to other Spanish speaking countries (especially since GPML courses are not yet available in that language). While noting that GEP needs to continue raising its efficiency in terms of time and cost of module production to be competitive with external options, it is (1) important for GPML (and other UNODC programmes) to use in-house platforms to reap the benefits of economies of scale to the extent possible, and (2) wherever modules are designed, irrespective of the platforms used, these should be utilized to the maximum possible level.

Lastly, while UNODC systems such as Umoja have been reported to affect the efficiency of various programmes, this was not raised in stakeholder consultations to a great extent. Various internal stakeholders appeared resigned to "live with it" and external stakeholders were generally not aware of specific issues originating from implementation of this new enterprise management system. Some stakeholders did mention that it had become harder to get reimbursed or rectify errors in the system. The evaluation did not find enough evidence to address issues pertaining to the effect of Full Cost Recovery on programme's efficiency. The evaluation, however, noticed that the GPML has not made any specific resources allocation for mainstreaming HRG in its activities.

Overall, the evaluation finds that the GPML appears to be using its resources efficiently, but opportunities for further improvement exist.

## ***Impacts***

7. To what extent has the project contributed to long-term intended or unintended impact for its targeted beneficiaries? What can be done to enhance the impact of the project?
  - Although due to complexity of interventions and multiplicity of players involved, quantifying the impact is beyond the scope of this evaluation, the project appears to be making a significant contribution to the improved AML/CFT situation.



Chart 21 below depicts the results chain used by the OECD/ DAC evaluation guide. It is easier to visualize that the GPML project has been delivering on its intended outputs. It is also evident that these outputs are influencing intended outcomes such as on improved policy environment, use of training to build capacity and improved AML/CFT regime and enforcement. Here, the evaluation considers impacts, the final step in the results chain.



‘Impact’ refers to the achievement of the GPML’s objectives pertaining to long-term benefits to targeted beneficiaries, including institutional, regime and social transformations. This information is either difficult to obtain or difficult to identify as relating explicitly to the impact of GPML. Furthermore, GPML documents do not generally provide information on its impact in the prevention and/or reduction in money laundering and financing of terrorism. Further, given the complex dynamics related to money laundering and financing of terrorism as well as multiplicity of players, it is hard to attribute impacts to specific actors without an impact evaluation. Design of interventions and limited scale of implementation make it even more difficult to quantify the change attributable to the current project.

That said, stakeholder consultation and progress reports provide some indications on impacts made. All partner countries have modified their legislation to comply with FATF recommendations, and the policy environment in most countries has undoubtedly improved (See Chart 10 and [Annex VII](#)). Further, the evaluation found evidence of long-term effects of training and technical assistance. The evidence is not systematic,<sup>14</sup> but the beneficiaries, interviewed and surveyed, credited GPML with helping change both ideas and practices on tackling AML/CFT issues. This was the case for beneficiaries at all levels of existing capacity from low to high.

These beneficiaries pointed out that training can change the culture inside a FIU by introducing standardized practices, and by operationalizing the organization of tasks. Backed by training, FIU staff can also be better equipped to implement changes. Trainees also reported a better understanding of the issues as well as ability to communicate the importance of AML/CFT to their peers. In this vein, the ToT approach is praised for its long-term potential. For example, following training in West Africa for financial investigators, 80 practitioners are now considered local trainers. Similarly, the mentor in Mekong has been using this approach for last several years. Stakeholders in Colombia reported that as a result of GPML’s capacity building efforts, a vast

<sup>14</sup> GPML has recently adopted a practice of surveying trainees 6 to 12 months after training (e.g., use of Kirkpatrick model in Colombia), which is likely to provide more useful inputs in this regard in future. Under the new practice, trainees are also asked to reflect on how training affected their work and in turn, how changes in their work made a difference to the national AML/CFT situation.

majority of prosecutors in charge of crimes related to drugs are now better prepared and more inclined to look into illicit financial flows behind predicate crimes.

GPML's technical assistance and training have also assisted in strengthening the legal system on AML/CFT and influencing specific pieces of legislation and/or regulation. For example, beneficiaries in West Africa reported useful assistance in the drafting of legislation. Similarly, Colombia has adopted explicit measures on AML/CFT in the official code of conduct of the real estate sector. It also has taken steps to institute harmonization of legislation relating to the non-financial sector, as well as contributed to improved investigations in the Ministry of Justice. These efforts have led to significant improvements in sanctions and convictions. In some cases, GPML is credited with providing the only available models for those in the non-financial sectors required to exercise risk assessments for AML/CFT.

GPML also provides technical assistance in preparing for FATF's "mutual evaluations", which has been shown to be useful to the operations of the FIUs. This finding is strongly backed by officials interviewed in their capacity as staff or representatives of FATF and the regional bodies. However, such support has not been made available to all countries in which the team interviewed stakeholders, and it is not clear how GPML chooses which jurisdictions get assistance. Technical assistance of this kind does not only benefit national FIUs but also some of the regional bodies such as ESSAMLAG. GPML assistance on FIU matters is also seen as useful to FIUs in lower capacity countries wishing to strengthen their international networks through, for example, membership of the Egmont Group.

The evaluation also found evidence of an important GPML contribution in cases where legislation has not only been adopted but effectively implemented (e.g., assets forfeiture in Namibia and Malawi). Chart 22, below, provides a few more examples from just the previous year. Stakeholders indicated that GPML, together with its progeny ARINSA, has provided training, mentorship and information sharing, which has resulted in a significant improvement in practices, systems, policies and procedures in dealing with cases of money laundering and proceeds of crime. Various sources (FIU officials, donors and ARINSA reports) indicated that GPML and ARINSA have played an important role in increase in the confiscations. Some FIUs (e.g., Namibia) went even further, and claimed that after receiving training under the Prosecutor Placement Programme in South Africa they have dramatically improved their success rate in forfeiting assets and recovering proceeds of crime.

While documenting impacts above, it became clear that GPML does not systematically collect and highlight this information. For example, the role of UNODC and GPML in Afghanistan has been very important, including during FATF's onsite visit in 2017 (FATF noted the progress made by Afghanistan in its June 2017 plenary), with important consequences for Afghanistan's financial sector. However, the evaluation found that GPML has not done much to showcase this achievement. More broadly, it has similarly not done much to showcase its role in assisting other countries, which were subsequently removed from the ICRG list (e.g., Vietnam).

While stakeholders recognized that GPML has been making an impact in its chosen area of work, the evaluation also noticed some significant gaps. (Please note that many of these gaps are identified on the basis of published academic and government research. Hence, while a disclaimer is in order — any data retrieved from non-UN sources that are used in this evaluation report do not reflect the position or endorsement of the United Nations Secretariat — and that these data are used for illustrative purposes only to demonstrate the seriousness of the challenges in the AML/CFT field.

Ideally, GPML needs to work towards becoming a repository of research on these issues, and present a more authoritative version of these data.)

One, GPML has limited footprint in most of the 88 countries that have been identified as money-laundering hotspots (Chart 23). Similarly, FATF in its October 2016 report<sup>15</sup> identified Afghanistan, Bosnia and Herzegovina, Iran, Iraq, Laos, North Korea, Syria, Uganda, Vanuatu, and Yemen as jurisdictions with strategic deficiencies. However, GPML has very limited presence in most of these countries. Thus, within the constraints of its resources, GPML has potential unexploited opportunities to make a greater impact, especially if it considers cost efficiencies associated with technological advances and is willing to fine-tune its geographic portfolio.

#### Chart 22. Highlights of GPML-supported AML/CFT results in 2016

- Cash worth USD 1.2 million in 27 cases seized by Vietnam customs.
- Ivory/rhino horn seizures by Customs in Cambodia (6 cases) and Viet Nam (12 cases).
- Crime proceeds worth USD 8.6 million recovered by ARINWA countries (West Africa).
- Crime proceeds worth USD 23 million seized by ARINSA countries (South Africa).
- Crime proceeds worth USD 56 million frozen abroad by Kazakhstan.

**Source: Project documents**

#### Chart 23. Countries/ jurisdictions facing major money laundering challenges (in 2016)

Afghanistan, Albania, Algeria, Antigua and Barbuda, Argentina, Aruba, Azerbaijan, Bahamas, Barbados, Belize, Benin, Bolivia, Bosnia and Herzegovina, Brazil, British Virgin Islands, Burma, Cabo Verde, Cambodia, Canada, Cayman Islands, China, Colombia, Costa Rica, Cuba, Curacao, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Georgia, Ghana, Grenada, Guatemala, Guinea-Bissau, Guyana, Haiti, Honduras, Hong Kong, India, Indonesia, Iran, Iraq, Italy, Jamaica, Kazakhstan, Kenya, Kyrgyz Republic, Laos, Lebanon, Liberia, Malaysia, Mexico, Morocco, Netherlands, Nicaragua, Nigeria, North Korea, Pakistan, Panama, Paraguay, Peru, Philippines, Portugal, Russia, Senegal, Serbia, Sint Maarten, South Africa, Spain, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Suriname, Tajikistan, Tanzania, Thailand, Timor-Leste, Trinidad and Tobago, Turkey, Turkmenistan, Ukraine, United Arab Emirates, United Kingdom, Uruguay, Uzbekistan, Venezuela, and Vietnam.<sup>16</sup>

Two, GPML like most of AML/CFT actors is yet to pay adequate attention to Trade-Based Money Laundering (TBML). As John Zdanowicz, an expert on money-laundering states, “The front door of money laundering is the banking system ... the government has done a pretty good job of closing the front door, but the back door – international trade – is wide open”.<sup>17</sup> According to this perspective, comprehensive regulation of the financial system has forced money launderers to look for alternative mechanisms for illicit financial flows, and comparatively unregulated global trade system<sup>18</sup> offers significant opportunities for money laundering.

TBML is a practice that involves faking or overstating transactions in order to legalize proceeds of other crimes. <sup>19</sup> While international trade has always been one of the mechanisms to evade

<sup>15</sup> FATF, Improving Global AML/CFT Compliance: Ongoing Process, October 21, 2016.

<sup>16</sup> The International Narcotics Control Strategy Report, US Department of State, <https://www.state.gov/documents/organization/268024.pdf>.

<sup>17</sup> McSkimming, Samuel. "Trade-based money laundering: Responding to an emerging threat." *Deakin Law Review* 15 (2010): 37.

<sup>18</sup> Cassara, John A. *Trade-based money laundering: the next frontier in international money laundering enforcement*. John Wiley & Sons, 2015.

<sup>19</sup> He, Ping. "A typological study on money laundering." *Journal of Money Laundering Control* 13.1 (2010): 15-32.

government scrutiny, its role until recently not received much attention from governments.<sup>20</sup> Recent research suggests that sophisticated criminal processes can be used to rather easily bypass current banking risk assessment techniques, and that overdependence on “traditional customer due diligence and transaction monitoring can easily be thwarted.”<sup>21</sup>

FATF also acknowledges that TBML is one of the three major money laundering methods used today, and an academic study in 2009<sup>22</sup> estimated that international trade masks hundreds of billions of dollars in illicit financial flows (Chart 24 presents estimates in respect of trade with the USA alone. Robust research on other countries is not readily available). Further, a FATF report in 2008 suggested that, “only 10 percent of international trade is financed through methods that could theoretically be monitored by the financial sector <sup>23</sup>,” while 80% of trade is financed through the banking system in a manner that it does not grant them access to details about the trade transactions.<sup>24</sup> The remainder does not use formal financial system at all.<sup>25</sup>

**Chart 24. Top 10 countries with trade-based money laundering from and to the US, in absolute and relative terms (2004)**

TBML out of US		TBML into US		TBML out of US		TBML into US		
<i>in billions of US dollars</i>				<i>as percentage of trade</i>				
1	Canada	18.3	Japan	25.6	Azerbaijan	269	Barbados	26
2	Japan	14.1	Germany	25.5	Serbia & Montenegro	72	San Marino	25
3	China	13.8	Canada	21.6	Iran	70	Italy	24
4	Mexico	13.0	China	20.3	Cuba	62	Germany	23
5	Germany	11.8	UK	16.2	Kazakhstan	35	Monaco	23
6	UK	10.1	Mexico	14.7	Bulgaria	34	Switzerland	23
7	S Korea	7.2	France	9.6	Estonia	32	UK	20
8	France	5.5	Italy	9.4	Denmark	31	Austria	19
9	Taiwan	4.8	S Korea	7.7	Barbados	26	France	18
10	Singapore	4.3	Taiwan	6.4	Philippines	24	Portugal	17

*Source:* dataset of Zdanowicz. The two lists in the left-hand panel show that the major trading partners of the US also have the most TBML with the US, but the two lists on the right hand reveal that in the rankings in relative terms other countries show up. The exports to Azerbaijan are so much undervalued, that the illegal money flow outnumbers the total trade data reported by a factor 2.7. Barbados is the only country that shows up in the top 10 of both outgoing and incoming TBML countries (measured as percentage of trade).

Source: De Nederlandsche Bank **working paper #318** <sup>26</sup>

It is clear from the above discussion that TBML is a major opportunity for GPML to take into account in future programming. In addition to strategic planning, it also has implications for impactful collaborations and partnerships on AML/CFT. In terms of new partnerships within

<sup>20</sup> Zdanowicz, John S. "Trade-based money laundering and terrorist financing." *Review of Law & Economics* 5.2 (2009): 855-878.

<sup>21</sup> Naheem, Mohammed Ahmad. "Trade based money laundering: towards a working definition for the banking sector." *Journal of Money Laundering Control* 18.4 (2015): 513-524.

<sup>22</sup> International Narcotics Control Strategy Report (INCSR), The United States Department of State.

<sup>23</sup> Liao, Jasper, and Arabinda Acharya. "Transshipment and trade-based money laundering." *Journal of Money Laundering Control* 14.1 (2011): 79-92.

<sup>24</sup> Banks are least involved in direct finance transactions, where they only act as senders or recipients of cash as directed by the importer/exporter. In such cases, they review trade documents only if suspicion of money laundering arises from other sources.

<sup>25</sup> <http://www.fatf-gafi.org/media/fatf/documents/reports/Trade%20Based%20Money%20Laundering.pdf>

<sup>26</sup> Ferwerda, Joras, et al. "Gravity models of trade-based money laundering." *Applied economics* 45.22 (2013): 3170-3182.

UNODC, the Global Container Control Programme (CCP) would appear to be one of the prime candidates. While CCP focuses on technical assistance with a view to control drugs and crime, it likely does not have the same expertise to help screen for money laundering. Research suggests that “even if a container is being screened for contraband, evidence of TBML is not as obvious, and would not be immediately apparent to personnel not specifically looking for it”.<sup>27</sup> Similarly, the World Customs Organization (WCO) would appear to be another major candidate for greater collaboration. WCO’s 2005 Framework of Standards to Secure and Facilitate Global Trade has standards addressing supply chain security with implications for TBML detection and interdiction.

Finally, the evaluation notes that GPML has taken some positive steps to address important emerging trends in AML/CFT (e.g., cryptocurrency and risk-based financial disruption). It has similar opportunities to address in respect of other emerging trends (e.g. internet-based gambling).

Overall, the evaluation finds that the GPML has made a significant positive impact on the AML/CFT situation around the world. GPML also has substantial potential opportunities to explore, going forward.

### ***Partnerships and cooperation***

8. To what extent have partnerships been sought and established (including with other units within UNODC and other UN agencies, professional associations, and civil society engagement) and synergies been created in the delivery of assistance? Were efficient internal cooperation and coordination mechanisms identified and established in building and managing these partnerships?
  - Partnership arrangements currently in place have helped the GPML project achieve its results. More partnership opportunities exist and should be explored.

The evaluation addressed the question of GPML’s partnerships within UNODC, with other UN offices, with other global and regional actors, and with local actors, and found evidence of reasonable levels of collaboration on AML/CFT issues. Specifically, the evaluation notes the following important partnerships. Within UNODC, GPML works closely with the Terrorism Prevention Branch (TPB), the offices of the Implementation Support Section dealing with human trafficking and migrant smuggling, the Corruption and Economic Crime Branch, the Co-Financing and Partnership Section, and the UNODC regional and country offices, especially those in which its Mentors are stationed. Its external partners include the World Bank, the International Monetary Fund, the World Customs Organization, the Counter-Terrorism Implementation Task Force (CTITF), the Counter-Terrorism Committee’s Executive Directorate (CTED), the Financial Action Task Force (FATF) and FATF-style regional bodies (FSRBs), INTERPOL, the Egmont Group of FIUs, the Anti-Money Laundering Global Task Force of the Global Organization of Parliamentarians against Corruption (GOPAC), the European Union and its agencies including Europol and Eurojust, and other bilateral organizations.

In terms of partnerships, two key questions pertain to the extent to which GPML (a) leverages joint initiative opportunities with potential partners, and (b) coordinates with other donor funded projects

<sup>27</sup> Liao, Jasper, and Arabinda Acharya. 2011. *ibid*

to create effective coordination and a formal/informal division of labor. The evaluations findings are summarized below.

### 1. Partnerships within the UNODC

Within UNODC, GPML is an important part of the Paris Pact on Illicit Financial Flows. GPML leads the money pillar. More broadly, however, there is evidence from the evaluation team's interviews that the organizational structure at UNODC HQ can be challenging when it comes to identifying key competences and avoiding overlaps: GPML and TPB, in particular, share many concerns on CFT so the lines of responsibility could easily become blurred. Moreover, the two divisions are organized differently (TPB is organized regionally) and it often falls to individuals, rather than the organizational structure, to promote collaboration. Nevertheless, TPB is a consistent collaborator for GPML. There is a division of labor, with GPML focusing on practical training and representation at FATF and the FSRBs, while TPB is more concerned with the legal aspects, compliance with conventions, and relationships with New York HQ. Staff in both divisions report a good working relationship and the impression that on the ground, beneficiaries do not perceive them as competing but as UNODC. GPML and TPB have been cooperating in a working group in the UN's counter-terrorism task force and have a joint project in Egypt. GPML and TPB are also working together on a possible project covering Morocco, Tunisia and Algeria. However, donors and some partners hinted at some difficulties in managing this relationship, as both the programmes compete for same resources. They suggested that the programmes first attempt to secure their own resources, and then seek to explore collaboration opportunities.

Relationships with the regional programmes appear more difficult, with evidence hinting that much of this is also due to fundraising pressures. Good collaboration is reported on some occasions, for example with the regional programmes in South Eastern Europe and Central Asia. In the field, there are also examples where potential synergies are noted but not acted upon. For example, in the UNODC's work in El Salvador and Panama, there are acknowledged overlaps between GPML and 'Anti-corruption.' Despite these potential overlaps, in practice collaboration is found to be difficult. There is some evidence that this is due mostly to GPML's limited capacity and over-stretching. Synergies may also be hampered by the different ways in which competences are organized under the UNODC banner in different regions. While asset recovery is an issue for GPML in Africa, it falls under 'Anti-corruption' in Central America.

Over all, the broader issue identified both within and outside the UNODC is the question of funding. In many instances, collaboration is hampered by competition for funds.

### 2. Partnerships with other UN offices

An important potential partnership in this category is that with the Chief Information Technology Officer (CITO) in New York on the question of goAML. In the 2014-2016 period, while goAML was still under UNODC auspices and its Information Technology Service (ITS), there was a close working relationship between GPML and ITS: GPML provided substantive expertise and ITS technical support. GPML staff presented the goAML software at regional meetings (RSFBs and EU) and in member states. GPML also hosted the 3rd committee meeting of goAML's user group in Vienna in 2016. This was part of a successful roll-out of goAML, which is now used by 30+ countries, including several European countries. With a new management regime for goAML in place since September 2016 (goAML is now under the CITO), this collaboration has come to an end. The evaluation shows that this decoupling is considered to be a positive development for

GPML for a diverse set of reasons: some stakeholders feared that some countries may have faced pressure to adopt goAML, while others report that with goAML being adopted by several high capacity countries, GPML has a diminished contribution to make.

The evaluation notes that partially due to the HRG blind design of the Programme, GPML did not seek to partner with HR and/or gender specialized organizations inside or outside UN. These partnerships do not come easily, as there is not a large body of research on HRG and AML/CFT neither are specialized organizations dealing exclusively with these issues. There are however UN agencies with considerable expertise on gender and/or HR, most significantly UN Women, that could partner with the GPML to explore possible links. Outside the UN, there are organizations such as the CGAP (Consultative Group to Assist the Poor) that focuses on Financial Inclusion and could shed interesting analysis in the area of HRG mainstreaming.

### 3. Partnerships with global and regional actors

GPML is the UNODC representative in meetings of the specialist AML/CFT bodies, FATF as well as the regional bodies. The evaluation found evidence that staff at FATF value the input of GPML and identify two types of contribution. First, FATF's Policy Development Group reaches out to GPML for expertise on topics such as information sharing with the private sector and financial inclusion. FATF staff consider GPML input important because of GPML's familiarity with conditions in the field and as a way to address the demands of the SDG agenda. Second, FATF's experience with assessors in the mutual evaluations is that some of the most accomplished assessors from countries outside the FATF core have benefited from GPML mentorship programmes. Though this second point is not evidence of a partnership per se, it is nevertheless important in seeing where GPML fits (and how it is perceived) in the wider AML/CFT regime. Other interviewees have suggested that cooperation with FATF could also take place on the issue of small country national risk assessments though there is no evidence that this will materialize. Finally, there is some collaboration taking place with FATF in the context of its Training and Research Institute (TREIN) in Busan, South Korea. The GPML team is keen to develop this collaboration, especially as GPML has a track record on training and e-learning that FATF lacks.

The evaluation shows different sets of partnership relations between GPML and the FSRBs. MONEYVAL reports that GPML was a more active observer in the past whereas there have been few interventions in recent meetings. It is not clear to those at MONEYVAL if this is a general policy of not commenting on countries, but they would welcome more input in meetings. Elsewhere, the role of GPML varies depending on the needs of the FSRB. GPML has been, for example, active in assisting GABAC becoming a partner at FATF and the dedicated mentor for the region cooperates closely with both GABAC and FATF.

The evaluation found that there may be differences within UNODC on whether GPML should be involved in assisting countries with the implementation of FATF standards. It was reported that some within UNODC point to UNCAC as alternative standards. It should be noted that the evaluation found no evidence that the two sets of standards are considered as part of the same regime (or as competing standards) by stakeholders; FATF standards are accepted as those relevant for AML/CFT issues. That said GPML is not viewed by stakeholders as simply linking up activities to FATF priority recommendations (this was reported as both an asset of the programme and a criticism). Interviews with UNODC staff (within GPML and elsewhere) suggest that the importance of a relationship with FATF (as opposed to mere interaction) is well understood.

Away from FATF and the FSRBs, the evaluation found evidence of reduced collaboration between GPML HQ and the World Bank. While GPML and WB continue to co-finance some mentors, there is a suggestion that due to budgetary constraints their level of collaboration has somewhat gone down. As per WB partners, this is due largely to their inability to meet continued expectations that the World Bank should fund joint activities as the better resourced partner. Similarly, interactions with the International Monetary Fund have been limited such as on a GPML-organized roundtable discussion in Ukraine which brought together the law enforcement side and the regulatory side. As IMF is exploring the possibility of shifting its focus from regulatory to enforcement issues, there may be some potential for increased collaboration in future, especially on issues pertaining to FIUs.

The GPML team reported that they had no information on other donor-funded projects on similar issues though such information would be beneficial both for partnerships and for gaining a better understanding of donor priorities.

#### 4. Partnerships with local actors

The evaluation team's interviews with stakeholders point to several concrete instances where GPML is engaged in effective partnerships at the national level. As a starting point, beneficiaries in Colombia, Burkina Fasso, Namibia, Moldova and Cyprus single out the needs-based approach taken by GPML in providing training and technical assistance. GPML assesses needs in close collaboration with local actors; this close partnership at the design stage of individual programmes is considered highly beneficial by beneficiaries interviewed in high, medium and low capacity countries. Additionally, there is evidence that such partnerships remain strong through personnel changes. Some beneficiaries in Southern and Eastern Africa, in contrast, suggest a less seamless experience.

In addition to the above findings, the evaluation also notes some specific areas of GPML strategic advantage.

1. GPML as a UN programme has a unique advantage in engaging national institutions from the public and private sectors on AML/CFT. This is because the UN flag ensures neutrality in what is, in some countries, a very sensitive issue and also, thanks to the technical expertise provided in a way that can depoliticize the issue (as has been the case in Colombia). National stakeholders consulted in Colombia unanimously considered the UNODC to be the best positioned international actor in AML/CFT. There is also evidence that UNODC is perceived as a partner in AML/CFT in Russia and Central Asia whereas other bodies adopt a more top-down approach in their dealings with countries in the region and are less concerned about individual country needs and circumstances.

2. In some regions (especially in Southern and Eastern Africa), stakeholders reported absence of adequate coordination among the international actors on AML/CFT and that strategies concerning the development of legislation, training and risk assessments could benefit from better coordination. Beneficiaries, however, consider the UNODC as the legitimate convener and potential organizer of activities in order to avoid overlaps. It should be noted that staff in the different international actors themselves often consider the mandates of their institutions sufficiently distinct. It is not clearly to what extent this is factually true as GPML staff report extensively using ESAAMLG Technical Assistance and Training Forum for coordination purposes. GPML, perhaps, need to examine the reasons underlying lack of satisfaction with level of coordination to better understand this issue.



3. GPML's role is not only valued in lower capacity countries but also in Europe, where stakeholders consider it to be well integrated in the international AML/CFT regime. They also find that it makes an important contribution relative to other actors by offering value-for-money in its training.

4. Collaborations with regional and global actors at the level of a national programme depend on the type of activities GPML is involved in locally (and by extension, the type of activity GPML has received funding to run). In some jurisdictions, there is important collaboration between the UNODC and a regional body on AML/CFT but GPML is not the UNODC programme involved (e.g., Panama).

5. GPML is seen as having a strategic advantage with the mentorship programme. Others who also place mentors in the field consider GPML to be best placed for this activity.

Overall, the evaluation finds that while GPML has successfully leveraged some of its partnerships (e.g., FATF) towards achieving its objectives and outcomes, funding challenges have posed stress on other ties (e.g., World Bank and other UNODC programmes competing for the same resources). (As noted in previous section, it also has potential opportunities for new collaborations (e.g., WCO, CCP, etc.)).

## ***Sustainability***

9. To what extent are the results (outcomes and impact) generated through the activities likely to be sustained in the countries if the GPML were to discontinue in near future?
- Institutionalization of AML/CFT regime bodes well for sustainability, although effectiveness depends on capacity development, which needs continued support. GPML itself cannot be sustained without continued support.

Sustainability refers both to the long-term financial sustainability of the programme and to the self-sustainability of the results achieved as a result of the programme, with or without further support. The latter question includes examining the extent to which the programme stakeholders and beneficiaries have taken ownership of the results, activities, and goals of the programme, and whether they are committed to continue working towards these results after implementation of the activities.

Sustainability of GPML results is built upon the AML/CFT legislation and international regime and the emerging communities of practice the Programme is contributing to develop, notably on the AML side at the country and regional levels.

Evidence suggests a certain degree of ownership of products and services provided by GPML. There are some indications on countries becoming self-reliant in training officials in the detection, prevention, and criminalization of money-laundering, especially in the West Africa and Central Asia regions. In other regions like Southeast Asia, trained officials and practitioners were identified as the most salient sustainability factor of the Programme as improvements in knowledge and skills are extended to larger groups of police and customs officers. The increase in the number of persons using the CBT/learning also suggests an expansion of the community of practice of AML practitioners at the country level. In some cases, training that is explicitly about CFT is less evident. The evaluation found evidence of specific work on CFT in Central Asia but there is a broader need

across the different regions for CFT training. More generally, the document review and feedback from GPML team and key stakeholders suggest that the CFT aspect is often blurred within the “AML/CFT” broad definition, which may indicate the need for better repositioning and/or rebranding of the programme.

Translation of learning modules, currently only available in English, to other languages may contribute to consolidation of sustainability of results, especially in regions like West Africa and Latin America.

The successful roll-out of goAML,<sup>28</sup> which is now used by 30+ countries, including several high capacity countries, also suggests that GPML’s positive contribution to improved management of AML/CFT efforts is likely to continue now that GPML has stepped out of the project given its transition from ITS to CITO.

As for the mentorship programme, there is evidence that GPML’s successful model of partnership at the design stage of interventions has been resilient to personnel changes. However, it has been noted that some beneficiaries in Southern and Eastern Africa document a less seamless experience. It would be useful, in order to smooth the transfer of knowledge between exiting and incoming staff, to encourage and assist regional mentors to select and guide promising trained practitioners that could take the lead in the community of practice at the country level, with some eventually becoming regional mentors. Several stakeholders also mentioned that it would be useful to focus fund-raising efforts to increasing the duration of some mentorship cycles; this could help consolidate know-how over a longer period of time without overwhelming local capacity with intense short bursts of activity. Finally, some stakeholders note that the mentorship programme could benefit from some geographical rotation among mentors that would enable sustainability efforts to be strengthened among different areas of expertise, reflecting the different specializations of GPML mentors; this, however, would require donor approval.

On the financial sustainability side, despite the widespread consensus that this is a long-term fight that needs sustained resourcing, GPML remains heavily dependent on extra-budgetary resources. This challenge, in addition to the increasing scarcity of resources, makes the sustainability of the programme uncertain.

Given the financial uncertainties ahead, some relevant stakeholders have expressed their worries about the lack of exit strategies on the part of GPML. Feedback from donors also suggests that there is scope for improving the financial sustainability of the programme by broadening its scope and/or by rising above operational aspects to further develop a long-term strategic vision. Building on the successful GPML model for the provision of training, guidance, and coordination in the fight against money laundering and the financing of terrorism, there is scope for increasing the sustainability of the programme by continuing to adapt to the changing context and by tailoring not only the products and services it provides, but also the AML/CFT approach, to the needs of partner countries, i.e., by strengthening its CFT focus in countries where the terrorist threat is the top policy priority and by deepening the links between GPML and the development agenda (e.g. through asset recovery) in other regions, particularly Africa.

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<sup>28</sup> Although goAML is not managed by GPML, it contributes to sustainability of AML/CFT results. Hence, it is in GPML’s own interest to promote this product now managed by CITO (and previously by ITS).

Last, but not the least, GPML has promoted regional networks like ARINSA, ARIN-AP and ARINWA that have helped build a critical mass of awareness and capacity among member states and their officials. These networks should prove to be an important asset in making the work of GPML self-sustainable.

Overall, the evaluation notes that the institutionalization of AML/CFT regime is a great sign for the sustainability of programme's results, although GPML itself faces serious challenges for its own sustainability.

## ***Human Rights and Gender***

Overall, the evaluation notes a mixed record of GPML in dealing with HRG issues. While GPML has made substantial progress since previous evaluation in addressing these issues, there are significant opportunities to do even more.

LEVEL	HRG MAINSTREAMING IN GLOU40
Identification / Priority setting / Programme formulation	<ul style="list-style-type: none"> <li>- Despite extensive UNODC commitments to mainstream HRG in all Programmes and Projects 29, GPML remains largely HRG-blind.</li> <li>- Using some of these commitments as references at the design stage could have served as useful guidelines and tools to unpack and address the potential HRG issues. For example:               <ul style="list-style-type: none"> <li>o The partnership strategy of the GPML could be broader if in the design of the Programme, it paid greater attention to the UN Resolution 2242 that urges Member States and the United Nations system to “ensure the participation and leadership of women and women’s organizations in developing strategies to counter terrorism”.</li> <li>o In terms of developing internal gender capacity, the 2011 System-wide Action Plan (UN-SWAP) on gender equality and women’s empowerment and the 2012 General Assembly Resolution 67/226 are relevant institutional tools to argue for an increase in the human and financial resources and capacity to mainstream gender within the GPML.</li> <li>o Resolution 67/226 also encourages United Nations organizations to collect, analyze and disseminate comparable data, disaggregated by sex. The GPML, mandated by this resolution and as part of the UN, which is considered a key custodian of global criminal statistics, could have designed specific strategies to encourage the use of disaggregated statistics.</li> </ul> </li> </ul>

<sup>29</sup> 1979 - Convention on the Elimination of all Forms of Discrimination Against Women

1993 - United Nations Declaration on the Elimination of violence Against Women

1995 - Fourth Conference of Women - The Beijing Platform for Action

1997- ECOSOC Resolution 1997/2 adopted gender mainstreaming as the strategy for integrating gender equality in programming

2000-2013 - United Nations Security Council resolutions on women, peace and security

2006 - UN system-wide policy on gender equality and the empowerment of women

2011- UN Chief Executives Board (CEB) for Coordination adopted the System-wide Action Plan (UN-SWAP) on gender equality and women’s empowerment.

2012 - General Assembly Resolution 67/226 on the Quadrennial comprehensive policy review, thereby complementing UN-SWAP

2012 – UNODC The Position Paper “UNODC and the Promotion and Protection of Human Rights”

2015 - Sustainable Development Goals and specifically SDG 5 on gender equality.

2017 - 50/50 UN Gender Parity.

2017 – Draft Declaration Mainstreaming a gender perspective into crime prevention and criminal justice policies and programmes

<p>Implementation, Monitoring and Reporting</p>	<ul style="list-style-type: none"> <li>- The Programme has tried to ensure that capacity building activities reach women and men in building activities. Beyond this, GPML does not have any other concrete emphasis on HRG during the implementation.</li> <li>- The monitoring systems of the GPML have not captured HRG dimensions, such as an analysis of the situation/involvement of different groups with the Programme, or specific gender indicators. Monitoring data has been collected in a disaggregated manner only in some of the training conducted and not consistently.</li> <li>- The staffing structure of the GPML currently does not meet the institutional commitment on gender parity in senior positions, although it has done a better job on this in the past.</li> <li>- There are no explicitly allocated resources (human, time, financial) to integrate human rights and gender aspects in the design, implementation, monitoring and evaluation of the GPML.</li> </ul>
<p>Evaluation</p>	<ul style="list-style-type: none"> <li>- The GPML is yet to undertake an HRG analysis of its focus and priorities with a view to ensuring a specific focus on HRG throughout all phases of the Programme cycle. This shortcoming at the design stage hindered a systematic HRG approach at the implementation phase and has hindered the capacity of the evaluation to assess on the contribution of the Programmes to the advancement of the human rights, gender equality and women’s empowerment.</li> </ul>

### III. CONCLUSIONS

The evaluation concludes that:

- 1) GPML has made a significant contribution to tackling the challenge of AML/CFT. Its efforts have contributed to change in legislation and policy in most countries and it has built the capacity of officials to effectively implement these in countries receiving its technical assistance. As a result of its efforts, many countries exhibit better awareness and enforcement on money laundering and the financing of terrorism. That said, GPML has limited or no presence in many prominent AML/CFT hotspots around the world.
- 2) Money laundering and the financing of terrorism continue to be a significant challenge around the world. As old loopholes are plugged, new ones are created. There is, thus, a strong need to continue improving the AML/CFT regime, while also building capacity of a wide variety of law enforcement and associated agencies. For example, as a result of stricter AML/CFT regime (e.g., financial sector regulations), trade-based money laundering (TBML), cryptocurrencies and internet gambling appear to be the most prominent emergent challenges.
- 3) Regional networks like ARINSA, ARIN-AP and ARINWA promoted by the GPML have helped build a critical mass of awareness and capacity among member states, and hence should prove to be an important asset in making the work of GPML self-sustainable.
- 4) GPML's mentoring programme is widely recognized as an effective mechanism for building trust and relationships necessary towards changes in AML/CFT regimes. However, it is a relatively expensive mode of capacity development in comparison to other TA delivery mechanisms (e.g., face-to-face workshops by trainers, eLearning, etc.) as a mentor is placed within a given country/region for an extended period of time.
- 5) Given resource constraints and the limited reach of GPML, use of cost effective strategies such as eLearning is critical. However, to make eLearning itself cost effective, its use needs to be promoted to a far greater user base for basic, preparatory and refresher purposes. eLearning course material can also be used for some advanced purposes if the right material and techniques are utilized.
- 6) GPML is considered to be good at long-term impact in countries that have already understood the importance of AML/CFT work (e.g., Kazakhstan). In other countries, where AML/CFT has not been prioritized, there is need for greater awareness creation.
- 7) GPML has been very successful in developing and leveraging partnerships and collaboration with some organizations (e.g., FATF), including promoting new regional networks (e.g., ARINSA), but resource constraints have weakened other ties (e.g., World Bank) to some extent.

- 8) Given the perceived success of international efforts, anti-money laundering is in danger of becoming a lower priority for some prominent donors, however countering financing of terrorism will likely become even more significant issue.
- 9) While the project does a very good job of reporting its activities and outputs, there is a need to improve results-orientation in all aspects of monitoring, evaluation and reporting. Moreover, the quality of data needs to be more detailed/ granular to not just generate reports that clearly lay out expenditures on various major activities (e.g., cost effectiveness of various components and interventions), but also link these to planned and obtained outcomes specified in the results-matrix. This information is needed for better decision-making.
- 10) While AML/CFT issues are often perceived as gender neutral, that is not the case. There is a need for increased awareness on human rights and gender (HRG) issues among all stakeholders.
- 11) Some stakeholders suggest that GPML’s focus on operational aspects of AML/CFT detracts from its strategic focus, and that it operates at a lower level than its counterparts such as the IMF and the World Bank.
- 12) GPML’s programme management arrangements (with several P4 officers, but no P5, for example) are less than ideal, and need to be looked into. In bureaucratic settings (for dealing with governments, for example), GPML needs a higher profile to deal with partners and national counterparts.

Overall, the findings and conclusions of this evaluation can be summarized with the help of the SWOT analysis in Chart 26:

<b>Chart 26. SWOT Analysis for the GPML</b>	
<b>Strengths</b>	<b>Weaknesses</b>
Mentoring system Relationships with partners (e.g., FATF) and law enforcement agencies in member states UNODC network and credibility	Insufficient financial resources (Relatively) weak monitoring and evaluation  Insufficient internal coordination within various interventions managed by different UNODC teams Inadequate attention to HRG issues (contrary to popular beliefs, AML/CFT is not HRG-blind)
<b>Opportunities</b>	<b>Threats/ Challenges</b>
Huge unmet demand for training  Emerging challenges in AML/CFT (e.g., Trade-based money laundering, Internet gambling, etc.) Partnership with other TA providers (e.g., WCO, CCP) Stronger cooperation with other parts of UNODC, especially on terrorism prevention and anti-corruption work eLearning for basic and refresher training  Advanced eLearning modules (e.g., gamification) Untapped niche exploring connections between HRG and AML/CFT	Unhealthy competition between various programmes for funding Discontinuation of funding by donors (e.g., US INL)

## IV. RECOMMENDATIONS

### **Key recommendations:**

- 1) Given anti-money laundering measures are only as strong as the weakest link in the chain (as well as resource constraints), GPML management needs to adopt a more strategic approach to identifying AML/CFT hotspots. GPML management should conduct detailed national risk assessment systems and plan its activities (including location of mentors) based on such assessment.
- 2) GPML management needs to undertake, perhaps in partnership with external partners in academia, detailed studies on tackling TBML, cryptocurrency, Internet gambling and other such emerging challenges. Based on the result of this study, GPML may need to revise its strategies and programme design.
- 3) GPML management should continue investing its efforts in promoting regional networks. It should also seek to broaden these networks by including local academic and research institutions, where possible, for increased self-sustainability. Further, in order to better manage the transfer of knowledge between exiting and incoming mentors, GPML management should consider encouraging and assisting regional mentors to select and guide promising trained practitioners that could take the lead in the community of practice at the country level and, eventually, at the regional level.
- 4) GPML management should explore the possibility of relocating mentors every few years to countries that require greater assistance (e.g., from Vietnam to Cambodia) to make the best use of its resources. Moreover, their efforts should continue to be complemented with Training-of-trainers, eLearning and other means to promote cost effectiveness. Relatedly, GPML management should standardize processes and carry out activities for improving coordination and knowledge-sharing among mentors, between mentors and regional offices, and between mentors and the Vienna office.
- 5) GPML management needs to promote eLearning more aggressively, including by insisting that its mentors and trainers make greater use of available training modules. Moreover, all training modules should be consolidated on a single eLearning platform, and duplication should be avoided to the extent possible. These modules should also be mobile-optimized given that most GPML beneficiaries access internet on their mobile devices.
- 6) GPML management should use tools (e.g., social media) for wider dissemination and feedback collection. It should also use web counters to keep track of resources that are being used (accessed, downloaded, etc.) to understand beneficiaries' needs better.
- 7) GPML management needs be more careful in tending to the weakening ties, including by exploring new areas and resources for collaboration.

- 8) UNODC management, with the support of GPML, should periodically undertake strategic assessments for ensuring that its product-market fit remains valid. These assessments are necessary for repositioning and rebranding its programmes. Currently, for example, management may like to explore the possibility of building greater synergies, including by merger, between some components of GPML and terrorism prevention and other components of GPML with the anti-corruption work. Similarly, in the present context, it may be necessary for the GPML management to explore the possible development of new products and services, or adapting existing ones, in order to help partner organizations and Member States to specifically address the CFT dimension of AML/CFT.
- 9) GPML management should undertake steps to improve its results-based monitoring and evaluation system. Its efforts to use Kirkpatrick model are a step in the right direction, but the management needs to go beyond training outcomes data to collect outcomes information on other aspects of technical assistance.
- 10) GPML should undertake a gender analysis of the focus and priorities of GPML/ GLOU40, with a view to ensuring a) specific focus on gender mainstreaming in Project thinking, planning, implementation and reporting and b) that all activities and intended results of the programme give consideration to the impact of activities and results on men and women.
- 11) For increased effectiveness, GPML needs to improve its engagement with higher level policy makers. This is especially important in order for the programme to make a meaningful contribution to the SDGs. GPML should also conduct studies and explore pathways for strengthening the links between GPML and the development agenda (e.g. through asset recovery), particularly in low income countries.

**Important recommendations:**

- 12) In the next phase of programming, GPML needs increased visibility, and UNODC management should consider either elevating the programme officer. It could also consider providing at least one regular budget position in the next biennial cycle to alleviate some fund-raising pressure on the programme. Alternatively, it could explore other options such as rebranding and repositioning the programme, emphasizing the CFT component more than the AML component, identifying synergies with UNODC's terrorism and anti-corruption teams respectively, and/ or even unbundling AML and CFT components and merging them with terrorism and anti-corruption work respectively, etc. All of these options should be carefully evaluated towards finding this critical work its rightful visibility.

**Other suggestions:**

- 13) The evaluation noted the absence of authoritative data on several aspects of money-laundering and financing of terrorism. GPML should aim to emerge as a knowledge hub that provide authoritative information on AML/CFT issues to members-states and other stakeholders.



## V. INNOVATIONS AND LESSONS LEARNED

1. GPML made a very effective use of mentoring to build capacity of member states, especially that of law enforcement agencies and FIUs, on AML/CFT effectiveness. Given the tradeoff between effectiveness and efficiency, as well as resource limitations, GPML has sought opportunities for cost effective approaches (e.g., eLearning, Training-of-Trainers, partnerships and development of professional networks). This is a best practice that GPML should continue honing further, and that other programmes within the UNODC can look to imitate.
2. GPML has made an effective use of regional networks (e.g., ARINSA, ARINWA, ARIN-AP, etc.) to promote better AML/CFT regime and outcomes around the world.
3. Third, while funding for GPML has increased over last few years, uncertainty over funding continues to be an issue of concern. It encourages unhealthy competition for resources and discourages long-term vision on programme's impacts and outcomes.

### **Chart 27: Responsible and Secure Businesses – Working with the Private Sector in Colombia**

The Programme “Responsible and Secure Businesses” (NRS in Spanish) has been unidentified as a GPML best practice in working with the Private Sector. NRS has 4 components: (a) Awareness raising through public campaigns including celebration of the AML day on the 29th of Oct; (b) Capacity Building through an exchange programme called “Financial Internships”. Interns from the non-financial sector spend time assigned to the financial sector and vice versa to learn in situ what the host organization can and cannot do about ML and how; (c) Specific training programme for Financial Journalists; (d) Development of tailored models and guidelines for specific non-financial sectors on how to fight ML. The programme was initiated in 2012 as a PPP (Public-Private-Partnership). It was financed by the UK DFID, Government of Colombia and the Chamber of Commerce of Colombia. It has become a flagship initiative of UNODC not only in Colombia but also in other countries in the region. Its most celebrated component for specialized sectors is based on the Australian Risk Assessment model and the ISO 31000. This partnership model has been acknowledged for its innovative nature, Value for Money (particularly related to the models for specialized sectors), and its relevance for the region. It was identified as a good response to new requirements and suggestions by FATF, and GPML (and UNODC HQ) would well to replicate this model elsewhere.

## ANNEX I. TERMS OF REFERENCE OF THE EVALUATION

### I. BACKGROUND AND CONTEXT

Project number:	GLOU40 ( 2004-31 March 2008: GLOB79)
Project title:	Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML)
Duration:	GLOU40: (1 April 2008 - 31 December 2015 and 01 April 2008 – 31 December 2019 respectively); (1997-31 March 2008: GLOB79)
Location:	Global
Linkages to Country, Regional and Thematic Programmes:	<p>Country Programmes:</p> <p>Links to Sub programme 2: Outcome 2.3 of the Indonesia Country Programme.  Links to Sub programme 3: Outcome 1 of the Iran Country Programme.  Links to Sub programme 2: Outcome 4 of the Laos Country Programme. Links to Sub programme 2: Outcome 2 of the Viet Nam Country Programme.</p> <p>Regional Programmes:</p> <p>Links to Sub programme 2: Outcome 1 of the Regional Programme on Afghanistan and Neighbouring Countries.  Links to Sub programme 2: Outcome 4 of the Caribbean Community Regional Programme.  Links to Sub programme 2: Outcome 2.3 of the Regional Programme on East Asia and the Pacific.  Links to Sub programme 1: Outcomes 1.1 &amp; 1.2 of the Eastern Africa Regional Programme.  Links to Sub programme 1: Outcome 7 of the Central America Regional Programme.  Links to Sub programme 1: Outcome 4 of the South Asia Regional Programme.  Links to Sub programme 1: Outcome 1.3 of the South Eastern Europe Regional Programme.</p> <p>Links to Sub programme 1: Outcome 1.3 of the Southern Africa Regional Programme.  Links to Sub programme 1: Outcome 1 of the West Africa Regional Programme.</p> <p>Thematic Programmes:</p> <p>Thematic Programme on Action against Transnational Organised Crime and Illicit Trafficking, including Drug Trafficking.</p>
Executing Agency:	UNODC/Associate Agency: UNOPS (United Nations Office for Project Services)
Partner Organizations:	-International Monetary Fund, World Bank, Organization for Security, Cooperation in Europe (OSCE), the EGMONT, Financial Action Task Force (FATF), Interpol, United States INL
Total Overall Budget	US\$ 55,900,334
Donors:	Belgium, Canada, Colombia, France, Germany, International Development Law Organization, International Tropical Timber Organization (ITTO), Ireland, Italy,

	Japan, Liechtenstein, Luxembourg, Netherlands, Norway, Russia, Sweden, Switzerland, UK, USA and the World Bank.
Project Manager/ Coordinator:	Oleksiy Feshchenko
Type and time frame of evaluation: (Independent Project Evaluation/In- depth Evaluation/mid- term/final)	Mid-term In-depth Evaluation
Timeframe of the project covered by the evaluation:	March 2011 (end of previous in-depth evaluation)- end of evaluation field mission (tentatively end April 2017)
Geographical coverage of the evaluation:	Global
Budget for this evaluation:	80,000 US\$
Type and year of past evaluations (if any):	Mid-term Independent Project Evaluation of the Activities Conducted in the Mekong Region conducted in 2014 and In-depth evaluation of the United Nations Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) conducted in 2011; currently ongoing: Final independent project evaluation of the activities in the Mekong Region ( finalized in first quarter 2017)
Core Learning Partners (entities):	UNODC Managers, Members States, selected Beneficiaries, Belgium, Canada, Colombia, France, Germany, International Development Law Organization, International Tropical Timber Organization (ITTO), Ireland, Italy, Japan, Liechtenstein, Luxembourg, Netherlands, Norway, Russia, Sweden, Switzerland, UK, USA and the World Bank.

### Project overview and historical context

As the successor to the Global Programme against Money Laundering (GLOB79) which was established in 1997 under the then United Nations Drug Control Programme (UNDCP) the new project GLOU40 entitled Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism encourages policy development on anti-money-laundering (AML) and countering the financing of terrorism (CFT), raises public awareness about the cross-cutting aspects of money laundering and the financing of terrorism, contributes to the strengthening of governance measures and anti-corruption policies, and acts as a centre of expertise of anti- money laundering and, jointly with the Terrorism Prevention Branch, countering the financing of terrorism. The Programme is pivotal to UNODC's mandate to prevent drug offences and other crimes in that it offers specialized services and tools to help Governments deal with an important component of action against crime with a view to removing the profits of such crime and providing a disincentive for committing them.

GLOU40 is focused on encouraging anti-money laundering and countering the financing of terrorism activities, raising public awareness about the cross-cutting aspects of money-laundering and the financing of terrorism, contributing to the strengthening of governance measures and anti-corruption policies and acting as a centre of expertise on anti-money laundering and, together with the UNODC Terrorism Prevention Branch, countering

the financing of terrorism related matters. Through the Global Programme, technical assistance has been provided to Member States in Asia, Eastern Europe, the Middle East, sub-Saharan Africa, Latin America and Caribbean. The Global Programme is the only source of technical cooperation with a global mandate to deal with all aspects of the fight against money-laundering and financing the terrorism. It provides a repository of best practices and information in those areas and promotes their dissemination through various initiatives.

The project adds to financial integrity and transparency with a view to contributing to the development of sound economic and financial environments in UN Member States, a prerequisite for generating long-term sustainable development and investment.

The original project (GLOB79: 1996-31st March 2008) was substantively revised in 2007, when a first detailed results framework (Logical Framework) was added. For the successor project (GLOU40: 1st April – 31st December 2016) the framework was revised with the support of UNODC's Strategic Planning Unit (SPU) with a view to meeting UNODC's standards.

Since the inception of the new project GLOU40 in March 2008, GPML has undergone several project revisions, only two of which were substantive and resulted in an extended duration of the programme (1 April 2008 - 31 December 2015 and 01 April 2008 – 31 December 2019 respectively). In addition, the revised document refers to staffing and budget changes in connection with the Implementation Support Section (ISS) of the Organized Crime and Illicit Trafficking Branch (OCB).

The non-substantive project revisions have been predominately administrative in nature with the purpose of transferring GPML mentors (P-4 temporary posts) from UNOPS segment to UNODC Headquarters segment. The approved project budget remained the same for these project revision purposes.

GPML's activities under this project are carried out under the Theme of Rule of Law. The project contributes to:

Result area 1.2 - International cooperation in criminal justice matters

Result 1.2.2 - Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering and the financing of terrorism in accordance with relevant General Assembly (GA) resolutions.

Result 1.2.3 - Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering related to organized crime, drug trafficking and corruption.

In the following way:

By placing anti-money laundering issues in the context of combating serious crime, including drug trafficking, terrorism and corruption. This is accomplished by contributing to the strengthening of governance, financial integrity, capacity for financial intelligence gathering and enhancement of investigative and prosecutorial systems with regard to money-laundering, the proceeds of crime and the financing of terrorism in accordance with related United Nations instruments and other AML/CFT standards.

Building the capacity of legislative bodies, criminal justice officials, supervisory and regulatory authorities and the private sector to draft, adopt and implement laws and regulations to combat money-laundering and the financing of terrorism.

An In-depth evaluation of the Programme was conducted throughout the second half of 2010. Among others findings, the evaluators concluded that GPML had been successful in

influencing the adoption of national legislation and the establishment of law enforcement institutions and procedures through its mentoring, training and information support systems. Model legislation developed by the programme had been used in national legislation and Financial Intelligence Units (FIUs) have been established in a large number of countries, at least some of which had a significant input from GPML. Some countries where GPML assistance has been provided have progressed to the point that they are providing training services to neighboring countries. The mentoring system has been found particularly successful in assisting countries in establishing AML legal regimes and improved law enforcement.

The final version of the evaluation was presented during the UNODC FinGov meeting on 18 February 2011. Of the eleven recommendations made, seven were aimed at GPML and four at UNODC's Senior Management. GPML is currently implementing the evaluation recommendations directed to the programme to the best of its ability, subject to adequate funding and staffing. A table of updated implementation progress and other information is available upon request from the GPML programme manager.

Project documents and revisions of the original project document:

Project document	Year	Please provide general information regarding the original project document. Change in (please check)
2008	As a successor to the Global Programme against Money-Laundering (GPML) which was established in 1997 under the then United Nations Drug Control Programme (UNDCP) this new project GLO/U40 entitled: Global Programme against Money-Laundering, Proceeds of Crime and the Financing of Terrorism encourages anti-money-laundering and countering the financing of terrorism policy development, raises public awareness about the cross-cutting aspects of money-laundering and the financing of terrorism, contributes to the strengthening of governance measures and anti-corruption policies, and acts as a centre of expertise of anti-money-laundering and, jointly with the Terrorism Prevention Branch, countering the financing of terrorism related matters. The Programme is pivotal to UNODC's mandate to prevent drug offences and other crimes in that it offers specialized services and tools to help Governments deal with an important component of action against crime with a view to removing the profits of such crime and providing a disincentive for committing them.	

2009	GPML assumed the coordination and administration role of the Pacific Anti-Money Laundering Programme (PALP) in October 2008, for which the USA pledged an additional US\$ 2,4 million over a two-year period. With the additional USA pledge for the PALP, the volume of pledges far exceed the current total approved budget of GLOU40. A new modular budget and related work plan are therefore submitted for approval. The project will be extended to 31 March 2012.	X Budget X Timeframe X Logframe
2010	The following changes are being introduced by this revision: - The reporting lines for the project has changed after the UNODC realignment became effective on 01 April 2010 and GPML now forms part of the Division of Treaty Affairs, with the Programme reporting to the new Deputy Director of DTA and Officer-in-Charge of the Organized Crime and Trafficking Branch (OCB). Anti-Money laundering/countering the financing of terrorism related issues fall under the OCB Implementation Support Section. -A Programme Steering Committee is being established to monitor the implementation of the activities of GPML in a transparent way and to facilitate cooperation between UNODC and its donor countries and relevant partner organizations providing technical assistance in the field of anti-money laundering and countering the financing of terrorism (AML/CFT). The modular budget is being increased to cover the Programme's projected needs until the end of 2015. This has the effect that the modular budget increased by the amount of US\$ 15,874,579. The total approved budget is being increased to US\$ 11,618,707 in order to allow GPML to programme the additional pledges received after the last revision.	X Budget X Timeframe
2011	The total approved budget is being increased to US\$ 12,184,250	X Budget
2012	The total approved budget is being increased to US\$ 15,214,846	X Budget
2013	This Project Revision is being done to create a new logframe for GPML and to modify titles on the staffing table per the request from HRMS.	X Logframe
2015	This Project Revision is being done to reflect the change in project management and structures, to extend the duration of the project until 31 December 2020 and	X Budget X Timeframe

	to increase the Overall Budget with US\$ 36,326,127 to a total of US\$ 63,819,413.	
2016	<p>This Project Revision is being done to reflect the changes in project management and structures.</p> <p>There were two main reasons for the changes: First, the increase of GPML budget in the previous project revision allowed to increase the amount of technical assistance delivered. With the introduction of Umoja in UNODC in 2016, the management of the increased number of consultants required additional staff. Second, new donors' contributions covered the part of the unfunded budget costs for the new regional advisors, which allowed to add 6 new mentors. This also leads to the necessary increase of HQ staff.</p>	X Budget
	<p>Implementation Support Section.</p> <p>-A Programme Steering Committee is being established to monitor the implementation of the activities of GPML in a transparent way and to facilitate cooperation between UNODC and its donor countries and relevant partner organizations providing technical assistance in the field of anti-money laundering and countering the financing of terrorism (AML/CFT).</p> <p>The modular budget is being increased to cover the Programme's projected needs until the end of 2015. This has the effect that the modular budget increased by the amount of US\$ 15,874,579.</p> <p>The total approved budget is being increased to US\$ 11,618,707 in order to allow GPML to programme the additional pledges received after the last revision.</p>	
2011	The total approved budget is being increased to US\$ 12,184,250	X Budget
2012	The total approved budget is being increased to US\$ 15,214,846	X Budget

*Main objectives and outcomes*

*Project Objective:*

*Assist Member States to prevent and suppress illicit financial flows (IFF) from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT).*

*Outcome 1*

*Member States have available improved knowledge on illicit financial flows, money-laundering and the financing of terrorism.*

*Output 1.1: Legislative bodies, criminal justice officials, financial supervisory and regulatory authorities, law enforcement officials and FIU personnel have increased awareness of money laundering and terrorism financing issues and methods to combat them.*

*Output 1.2: GPML has researched, drafted and disseminated reports, briefing notes, speeches, publications, and studies related to IFF and AML/CFT.*

*Output 1.3: The International Money Laundering Information Network (IMoLIN), including the Anti Money Laundering International Database (AMLID) is promoted, used and updated.*

*Output 1.4: GPML's contribution to Regional and Country Programmes and Strategies.*

*Output 1.5: Reporting to the Commission on Narcotic Drugs (CND) and the Commission on Crime Prevention and Criminal Justice (CCPCJ) is provided.*

### *Outcome 2*

*Member States have effective and updated AML/CFT legal frameworks, regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards.*

*Output 2.1: Review and enhance AML/CFT laws, regulations, and policies to align with relevant UN Conventions and international standards.*

*Output 2.2: Assisted Member States have mandated and trained national regulatory and financial supervisory officials, judiciary and law enforcement officials, including Financial Intelligence Units personnel, to deal with AML/CFT.*

### *Outcome 3*

*Enhanced national-level coordination and regional/international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters.*

*Output 3.1: Creation of formal and informal networks among AML/CFT professionals.*

*Output 3.2: Expert technical advice and inputs are provided to inter-regional and international stakeholders dealing with AML/CFT matters.*

*Output 3.3: Assisted Member States have enhanced mechanisms and tools for bilateral and multilateral cooperation on AML/CFT.*

*Output 3.4: Assisted Member States have informal, regional networks for the confiscation and forfeiture of criminal proceeds.*

### *Contribution to UNODC's country, regional or thematic programme*

*The Programme contributes to the following country and regional programmes: Country Programmes:*

*Links to Sub programme 2: Outcome 2.3 of the Indonesia Country Programme. Links to Sub programme 3: Outcome 1 of the Iran Country Programme.*

*Links to Sub programme 2: Outcome 4 of the Laos Country Programme. Links to Sub programme 2: Outcome 2 of the Viet Nam Country Programme.*

### *Regional Programmes:*

*Links to Sub programme 2: Outcome 1 of the Regional Programme on Afghanistan and Neighbouring Countries.*

*Links to Sub programme 2: Outcome 4 of the Caribbean Community Regional Programme. Links to Sub programme 2: Outcome 2.3 of the Regional Programme on East Asia and the Pacific.*

*Links to Sub programme 1: Outcomes 1.1 & 1.2 of the Eastern Africa Regional Programme. Links to Sub programme 1: Outcome 7 of the Central America Regional Programme.*



*Links to Sub programme 1: Outcome 4 of the South Asia Regional Programme.*

*Links to Sub programme 1: Outcome 1.3 of the South Eastern Europe Regional Programme. Links to Sub programme 1: Outcome 1.3 of the Southern Africa Regional Programme.*

*Links to Sub programme 1: Outcome 1 of the West Africa Regional Programme.*

*The Programme contributes to the following thematic programmes:*

*Thematic Programme on Action against Transnational Organised Crime and Illicit Trafficking, including Drug Trafficking.*

*Linkage to UNODC strategy context and to Sustainable Development Goals*

*GLOU40 was developed under the UNODC Strategy for the period 2008-2011. In implementing its strategy over the biennium 2008-2009, UNODC responded to the growing demand for its services by establishing a strongly integrated mode of programme planning and implementation. Under the new structure of the UNODC strategic framework for the biennium 2012-2013 the global programme GLOU40 fell under the thematic sub-programme 1 “Countering transnational organized crime and illicit trafficking, including drug trafficking”.*

*In line with the strategic framework, UNODC has also adopted a Thematic Programme on Action Against Transnational Organized Crime and Illicit Trafficking, Including Drug Trafficking that set out the strategic priorities for UNODC for the 2011-2013 period. This Thematic Programme aimed to provide a coherent and comprehensive approach to efforts to prevent and combat all forms of transnational organized crime. GLOU40 has both informed and been further developed in the framework of the Thematic Programme and, specifically, fell under Sub-Programme 2 of the Thematic Programme: Regional and National Capacity Building and Technical Assistance. The Global Programme GLOU40 was also aligned under Sub- Programme 2 and gave practical application to the Thematic Programme, developing global solutions to critical challenges and both supporting and delivering direct technical assistance, in close consultation and coordination with the regional offices.*

*Under the strategic framework for the biennium 2014-2015, the Global Programme GLOU40 fell under sub-programme 1: "Countering transnational organized crime and illicit trafficking, including drug trafficking". GLOU40 also fell under the UNODC Thematic Programme on Action Against Transnational Organized Crime (2014 -2015).*

*The Global Programme contributes to Sustainable Development Goal 16.4, which reads: By 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime.*

*Through the United Nations Sustainable Development Goals adopted last year, the international community has committed itself to the promotion of peaceful and inclusive societies for sustainable development, to the provision of access to justice for all and to the building of effective, accountable and inclusive institutions at all levels (SDG #16). In doing so, we have collectively committed to combat all forms of organized crime (16.4), including significantly reducing illicit financial flows by 2030 and strengthening the recovery and return of stolen assets. The technical assistance and training of the Programme is geared towards assisting Member States to achieve that.*

## DISBURSEMENT HISTORY

Time periods throughout the <u>life</u> time of the project	Total Approved Budget	Expenditure	Expenditure in %
03/2008-12/2008	1,427,800	1,169,716	82%
01/2009-12/2009	3,271,200	3,158,575	97%
01/2010-12/2010	3,031,200	2,487,103	82%
01/2011-12/2011	3,157,000	2,722,387	86%
01/2012-12/2012	3,145,900	2,844,283	90%
01/2013-12/2013	3,359,200	2,848,193	85%
01/2014-12/2014	3,620,600	3,277,330	91%
01/2015-12/2015	5,168,300	4,671,838	90%
01/2016-10/2016	6,268,400	4,400,186	70%

<u>Time period covered by the evaluation</u>	Total Approved Budget	Expenditure	Expenditure in %
01/2011-12/2011	3,157,000	2,722,387	86%
01/2012-12/2012	3,145,900	2,844,283	90%
01/2013-12/2013	3,359,200	2,848,193	85%
01/2014-12/2014	3,620,600	3,277,330	91%
01/2015-12/2015	5,168,300	4,671,838	90%
01/2016-10/2016	6,268,400	4,400,186	70%

## PURPOSE OF THE EVALUATION

As foreseen in the project document (GLOU40) as well as per UNODC Evaluation Policy, an Mid-term In-depth evaluation of the Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) needs to be conducted for the period of March 2011 until the end of the field mission (tentatively April 2017). The main objective of this independent evaluation is to generate and facilitate learning for the future of the programme as well as for future programming in the field of GPML. Moreover, the purpose of the Mid-term In- Depth evaluation is to assess the implementation of the previous mid-term in-depth evaluation recommendations; achievements/non-achievements half-way through the Global Programme as regards the Programme's relevance, design, efficiency, effectiveness, impact, partnerships and sustainability in order to derive lessons learned as well as best practices for the continuing implementation of the programme as well as for future project planning in the area of GPML. Furthermore, it will be assessed to what extent human rights aspects and gender mainstreaming have been taken into account during all phases of the programme. A dedicated gender expert will be contracted as part of the evaluation team.

The Mid-term In-depth evaluation seeks to identify areas of improvement in the Global Programme, to get feedback, appraisal and recognition. Through this Mid-term In-depth evaluation process and its findings, new strategic directions may be developed. The evaluation findings will be shared among relevant stakeholder and used to inform and better direct GPML programme strategy and activities in thematic areas, as well as helping to effect change in the money laundering , proceeds of crime and financing of terrorism sectors.

The evaluation will provide recommendations, to be followed upon and implemented, its findings will be shared and presented among relevant stakeholders.

Furthermore, one of the main objectives of the Mid-term In-depth evaluation is the assessment of the implementation of the 2011 In-depth recommendations and assess if project performance improved based on the proposed adaptations/ changes.

Recommendations of the In-depth evaluation in 2011 <sup>2</sup> (Implementation plan of the evaluations under Desk Review material)
Recommendation 1: UNODC’s senior management should continue the programme and give it more priority, in order to make best use of its developed reputation, networks and experience, and the comparative advantage of a United Nations programme, which is perceived as a global player and as more impartial and aware of regional characteristics than other AML/CFT technical assistance providers;
Recommendation 2: UNODC’s senior management should consider the cross cutting nature of AML/CFT and the limitations resulting from the positioning of GPML under one of the convention related branches, and take steps to ensure its organizational visibility and its ability to provide assistance to other conventions and effective centralized quality control <sup>3</sup> of AML/CFT related UNODC projects;
Recommendation 3: GPML should prepare a long-term strategic plan for the period 2011-2015, in coordination with senior management and in consultation with relevant UNODC sections at headquarters and in the field. Human and financial resources needed to implement the plan, as well as future modalities of key stakeholder involvement, should be clarified. The strategic plan, once agreed, should be consulted with donors;
Recommendation 4: GPML should sustain and intensify the “mentoring programme”, with mentors or long-term consultants servicing several countries in a region, while ensuring that the number of countries covered by each mentor or long-term consultant allows for longer periods of time in each country, and for a focus on countries where law enforcement is the priority. The detailed planning should be based on the long-term strategic plan and should include provisions for headquarters’ quality control;
Recommendation 5: UNODC’s senior management should aim at a sufficient long-term core funding for GPML, if possible from the regular budget of the organization, in order to ensure the sustainability of the programme and its ability to adequately manage the global aspects of AML/CFT, as well as ensure coordination, quality control and consistency for UNODC’s AML/CFT activities in the field. To the extent that funds can be provided from the regular budget of the United Nations, this should be included in the budget proposals for 2012-2013;
Recommendation 6: GPML and UNODC field offices should continue to focus on increased and more formalized communication to ensure regional integrated programming, as well as quality control and consistency of all AML/CFT related UNODC projects. Regional advisors for AML/CFT, jointly funded by GPML and Regional Offices, should support coordination and programming, while GPML mentors should continue to focus on in-depth AML/CFT capacity- building in selected countries. Clear and effective reporting structures need to be set up between mentors and UNODC offices in the field and GPML headquarters, ensuring that field representatives are kept informed and GPML can carry out its oversight function;
Recommendation 7: UNODC’s senior management should designate GPML as a formal point of contact for partner entities like World Bank and IMF, for all AML/CFT related matters, including corruption, asset recovery and terrorism prevention, in order to ensure that GPML is informed about and able to contribute to initiatives relevant to AML/CFT;
Recommendation 8: GPML should put more focus on promoting its various valuable products, like tools, publications, the IMoLIN website and AMLID database, as well as its AML/CFT Computer Based Training, and should continue to jointly promote the goAML software for Financial Intelligence Units developed by UNODC’s Information Technology Service;
Recommendation 9: GPML should use its strategic plan for the period 2011-2015 as the basis for acquiring and recording results data more systematically. It should ensure that all relevant information, particularly on outcome level results related to its activities, is readily available for coordination,

oversight and knowledge management. This information should also include a database of all counterparts/beneficiaries and partners, and mentoring related lessons learned;
Recommendation 10: GPML should continue to proactively seek to improve coordination among technical assistance providers through measures like newsletters, bilateral meetings and joint activities and, in addition, through a more formalized cooperation with partner organizations and lobbying for the institutionalization of meetings for technical assistance providers and beneficiary FIUs in order to coordinate, harmonize and finalize their assistance plans in the margins of FATF, Egmont Group and FSRB meetings;
Recommendation 11: GPML should identify centres of excellence and best practice examples in all regions and use its ‘prosecutor placement programme’ as a model for fostering learning and networking between various law enforcement agencies, including Financial Intelligence Units, of different countries and regions and for improving cross—border cooperation;

The evaluation is being initiated by GPML’s management team and is guided by UNODC Independent Evaluation Unit in regards to quality assurance in situ and from headquarters through the provision of guidelines, formats, assistance, advice and clearance on key deliverables during the evaluation process. IEU further ensures that the GPML evaluation conforms to the United Nations Evaluation Group (UNEG) Norms and Standards.

The GPML project manager, in consultation with IEU, proposes a Core Learning Partnership (CLP) to ensure a participatory evaluation process during key stages of the evaluation. Members of the CLP shall be selected from key stakeholder groups (Annex III), including UNODC management, partner organizations, Member States, beneficiaries and Programme’s mentors. The CLP will be asked to comment on key steps of the evaluation. GPML holds an annual donor briefing at the time of its annual mentors’ meeting to give an opportunity to its mentors to present specific activities carried out in their respective regions. It is envisaged that the findings of the evaluation will be presented at this meeting, with other interested stakeholders present.

## SCOPE OF THE EVALUATION

Unit of analysis (full project/programme/ parts of the project/programme; etc.)	Full Project
Time period of the project/programme covered by the evaluation	2011 – end of evaluation field mission (tentatively April 2017)
Geographical coverage of the evaluation	Global

## KEY EVALUATION QUESTIONS

### Evaluation Criteria

<i>Relevance</i>
<i>Relevance is the extent to which the aid activity is suited to the priorities and policies of the target group recipient and donor</i>
1. To what extent did the implementation of the recommendations lead to improved design and/or implementation of the project/programme?

2. To what extent are the outputs, outcomes and objectives of this project/programme relevant to implementing the Sustainable Development Goals?
3. To what extent is the programme the appropriate mechanism to promote international cooperation to prevent and combat money laundering and financing the terrorism?
4. To what extent is the programme relevant to international efforts as well as the strategies of individual countries in combatting money laundering and financing
<i>Efficiency</i>
<i>Efficiency measures the outputs - qualitative and quantitative - in relation to the inputs.</i>
1. What measures have been taken during the planning and implementation of the activities to ensure that resources are efficiently used? To what extent did these measures contribute to efficiency?
2. To what extent have the Programme's resources been managed in a transparent and accountable manner? How well the implementation of activities managed?
3. To what extent did cooperation with internal and external partners contribute to the efficiency of the projects implementation?
<i>Effectiveness</i>
<i>Effectiveness is a measure of the extent to which an aid activity attains its objectives.</i>
1. To what extent have the programmes/projects achieved/are likely to achieve its objectives and expected results (outputs and outcomes)?
2. How well the structure of the programmes contribute to fulfil the mandate of the
3. What was the contribution of communication with internal and external offices, specially Field/Regional offices, to achieving the program objectives??
<i>Impact</i>
<i>Impact is the positive and negative changes produced by a development intervention, directly or indirectly intended or unintended.</i>
1. To what extent did the project/programme contribute to the Sustainable Development Goals?
2. To what extent have the programme contributed, or is likely to contribute, to long-term impact and/or intermediate results (directly or indirectly, intended or unintended) for its beneficiaries target groups communities involved and institutions related to the
3. What are the intended or unintended positive and negative long-term effects of the Global Programme on Money Laundering and the Financing of Terrorism (GLO/U40)?
<i>Sustainability</i>
<i>Sustainability is concerned with measuring whether the benefits of an activity are likely to continue after donor funding has been withdrawn.</i>
1. To what extent are the results (outcomes and impact) generated through the activities likely to be sustained in the countries after implementation?
2. Have the programme stakeholders and beneficiaries taken ownership of the results, activities and goals of the programmes? Are they committed to continue working towards these results after implementation of the activities?
<i>Partnerships and cooperation</i>
<i>The evaluation assesses the partnerships and cooperation established during the project/programme as well as their functioning and value.</i>
1. Has GPML effectively leveraged joint initiative opportunities with other United Nations entities (including UNODC Field Offices) and other anti-money laundering bodies throughout the world?

2. To what extent have the activities and outputs benefited from the expertise of and cooperation with other relevant international organizations and non-governmental organizations?
3. What lessons can be drawn from GPML's engagement with target beneficiaries such as legislators, prosecutors, FIU analysts and law enforcement officials during the local capacity building joint collaborations.
<i>Human rights and Gender</i>
<i>The evaluation needs to assess the mainstreaming of human rights aspects throughout the project/ programme.</i>
<i>The evaluation needs to assess the mainstreaming of gender aspects throughout the project/ programme.</i>
<i>Human rights</i>
1. To what extent have human rights principles been integrated into the programmes design and implementation?
2. What measures have been taken during planning and implementation to ensure that human rights aspects were mainstreamed?
<i>Gender</i>
1. What measures have been taken during planning and implementation to ensure that gender aspects were mainstreamed?
2. What measures have been taken to ensure the inclusion of men, women and marginalised groups throughout the activities of the programmes?
3. How can the approach to gender be improved in the activities of the programme?
<i>Lessons learned and best practices</i>
<i>Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.</i>
1. What lessons can be learned from GPML's mentoring initiative and other implementation modalities in order to improve performance, results and effectiveness in
2. What good practices in general emerged from the implementation of this project that can be replicated in other programmes and projects?
3. What is considered to be the most effective aspect of the mentor program on AML/CFT progress?

## EVALUATION METHODOLOGY

The promotion and protection of Human Rights and Gender Equality are central principles to the mandate of the UN and all UN agencies must work to fundamentally enhance and contribute to their realization by addressing the underlying causes of human rights violations, including discrimination against women and girls, and utilizing processes that are in line with and support these principles. Those UN interventions that do not consider these principles risk reinforcing patterns of discrimination and exclusion or leaving them unchanged.

According to the UNODC Evaluation Policy, Handbook and Guidelines and the United Nations Evaluation Group (UNEG) Norms and Standards, the integration of Human Rights & Gender Equality dimensions in the evaluation process will enable the UN system to better learn lessons, hold key stakeholders accountable for results, and in turn improve policies and programming, which will contribute to the realization of HR & GE and meeting the Strategic Development Goals

(SDGs ) and other UN mandates. Regardless of the size of the intervention, an evaluation design which applies a mixed-method approach will be the most appropriate to generate an accurate and comprehensive picture of how HR & GE are integrated into an evaluation.

The emphasis of the methodology for the Mid-term In-depth evaluation will lie on the mixed-method approach. The application of quantitative as well as qualitative data collections as well as analysis methods will enable the evaluator to triangulate any findings and test rival hypotheses. Additionally, considering the mandates to incorporate HR & GE in all UN work specially when evaluating UN interventions, the methods need to be gender sensitive and incorporate human rights considerations.

Consideration of HR & GE adds important principles of equality, inclusion and non- discrimination to evaluation. It contributes to the social and economic change process by identifying and analyzing the inequalities, discriminatory practices and unjust power relations that are central to development problems.

The evaluators will perform a desk review of existing documentation (Preliminary list of documents to be consulted below); information stemming from secondary sources will be cross- checked and triangulated through data retrieved from primary research methods. Furthermore, the methods applied will be gender-sensitive and inclusive in order to include the voices and opinions of men, women and other marginalised groups.

The main elements of method will include:

- Preliminary desk review of all relevant project documentation, (Annex II), as provided by the Programme Manager and as requested by the evaluation team;
- 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 IEU for review and clearance before any field mission may take place;
- Interviews (face-to-face or by telephone), 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 evaluators submit the draft report first to IEU for quality control. IEU shares the draft report, once cleared, with Project Managers for the review of factual errors or omissions and the evaluators consider the comments. Subsequently IEU shares the final draft report with all Core Learning Partners for comments on factual errors.
- Preparation of the final evaluation report. The evaluators incorporate the necessary and requested changes and finalizes the evaluation report; following feedback from IEU, the Project Manager and CLPs for IEU clearance;
- Presentation of final evaluation report with its findings and recommendations to the target audience, stakeholders etc. at a meeting at UNODC Headquarters.
- 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 desk review will include the following documents, among others:

1. Semi Annual and Annual Project Progress Report from 2009 to 2016;
2. Training Methodology;
3. Project Document GLOU40 (2008)

4. Project Revision GLOUB79 (2007)
5. Evaluations report GLOU40-Mekong
6. GPML Fact Sheets
7. Non-Substantive Project Revisions GLOU40 (2009-2010)
8. GPML Newsletter 2016
9. GPML Future Directions and Strategic Planning

In addition, the following data collection methods and sources will be used:

Qualitative methods: Structured and semi-structured interviews with key stakeholders, key informants or representatives of different interested entities (face-to-face, by telephone or by webcam);

Quantitative methods: The use of survey questionnaires.

The credibility of data and the analysis of data is key to the evaluation. Rival theories and competing explanations must be tested once plausible patterns emerge from triangulating data stemming from primary and secondary research. In order to assess the impact of the programme, “before and after data” should be used – as much as feasible, addressing methodologically the questions listed under “impact”.

#### VII. TIMEFRAME AND DELIVERABLES

<i>Duties</i>	<i>Time frame</i>	<i>Location</i>	<i>Deliverables</i>
Desk review and preparation of draft Inception Report	01–17 March 2017  (13 working days)	Home based	Draft Inception report containing: preliminary findings of the desk review, refined evaluation questions, data collection instruments (including questionnaire and interview questions), sampling strategy, evaluation matrix and limitations to the evaluation
Review and subsequent clearance of draft Inception Report by IEU (can entail various rounds of comments)	18 – 24 March 2017	UNODC/HQ	
Consideration and incorporation of comments from IEU	25-28 March 2017 (2 working days)	Home based	Revised draft Inception Report
Deliverable A: Final Inception Report in line with UNODC evaluation norms, standards, guidelines and templates	By 28 March 2017 (overall working days: 15)	Home based	Final Inception report to be cleared by IEU
Interviews with staff at UNODC HQ/FO; Evaluation mission: briefing, interviews; presentation of preliminary findings	01 – 28 April 2017  (15 working days)	UNODC/HQ;  Countries/Cities will be decided during the Inception Phase	Presentation of preliminary findings
Drafting of the evaluation report;	01 – 21 May	Home based	Draft evaluation report



	(15 working days)		
Submission to IEU for review and comments;	22 May – 09 June	UNODC/HQ	Draft evaluation report
Submission to Project Management for review of factual errors;	12 – 21 June	UNODC/HQ	Draft evaluation report
Consideration of comments from the project manager and incorporation of comments from IEU (can entail various rounds of comments)	22 - 30 June 2017  (7 working days)	Home based	Revised draft evaluation report
Deliverable B: Draft Evaluation Report in line with UNODC evaluation norms, standards, guidelines and templates	By 30 June 2017 (overall working days: 37)	Home based	Draft evaluation report, to be cleared by IEU
IEU to share draft evaluation report with Core Learning Partners for comments	01 – 16 July 2017	UNODC/HQ	Revised Draft Evaluation Report
Consideration of comments from Core Learning Partners	16 – 25 July 2017  (7 working days)	Home based	Revised draft evaluation report
Final review by IEU; incorporation of comments and finalization of report	26 – 31 July 2017	UNODC/HQ	Revised draft evaluation report
Presentation of evaluation results	To be confirmed (1 working day)		Presentation to external stakeholders (to be reviewed and cleared by IEU)
Deliverable C: Final evaluation report incl. Management response (if needed); presentation of evaluation results; Evaluation Brief (2-pager)	31 July 2017 (overall working days: 8)	Home based and travel to Vienna	Final evaluation report; final Evaluation Brief; Presentation of evaluation results. All to be cleared by IEU

Project Management shares final report with stakeholders	01 – 06 August 2017	UNODC/HQ	Final evaluation report disseminated
Project Management: Finalise Evaluation Follow-up Plan in ProFi	07 – 31 August 2017	UNODC/HQ	Final Evaluation Follow-up Plan to be cleared by IEU

#### VIII. EVALUATION TEAM COMPOSITION

The Mid-term In-depth evaluation will be conducted by external, independent, internationally recognized evaluators hired for this specific purpose and one evaluation officer from the UNODC IEU. The experts should not have prior involvement with the programme under evaluation. In addition, another external consultant will be hired in order to assess the aspect of gender mainstreaming aspects that will be considered during this evaluation.

The evaluation team will include:

- One Lead Evaluator (independent external consultant) with extensive experience in research and knowledge of, and experience in applying, qualitative and quantitative evaluation methods. He/She shall have an expertise in the area of AML/CFT related matters. Work experience with the United Nations is desirable. The Lead Evaluator will supervise and coordinate the drafting of the evaluation report (for more information please see the Lead Evaluator TOR in Annex 1);
- One substantive expert (team member) with expertise in the area of AML/CFT will be contracted separately by the UNODC. He/She should not have any previous or current or foreseen involvement with the programmes. The substantive expert will support the lead evaluator and will be involved in briefing the lead evaluator prior to the field missions. He/She will provide feedback to the draft evaluation plan, methodology, questionnaires and draft evaluation report, and take part in technical roundtable of main donors in order to review the preliminary findings of the evaluation. If necessary, the substantive expert will get further involved in the evaluation.
- An additional gender expert will be also contracted separately by the UNODC IEU in order to guide the evaluation process on all issues on gender mainstreaming. He/She should not have any previous or current or foreseen involvement with the programme. The gender expert will support the team and provide specific guidance regarding gender-sensitive and inclusive methodology, gender mainstreaming throughout all evaluation questions and during the evaluation. He/ She will provide in particular feedback to the inception report and the draft evaluation report in order to ensure an appropriate addressing gender mainstreaming in this evaluation.
- Two staff members from UNODC IEU will be part of the evaluation team with the role to ensure quality control and oversee the process. They will accompany the team during field visits, jointly carry out interviews and participate in data analysis.

The evaluation team will not act as representative of any party and should use their independent judgement. The evaluation team cannot be involved in the design, appraisal or implementation of the programme. The evaluators will be and remain throughout the process independent and impartial. The evaluation team does not have any authority to make any commitment on behalf of the programme parties (i.e. UNODC), recipient countries and donors.

The evaluation team will work closely with the members of the UNODC/ISS/COB who will provide them with relevant information on the programme and provide support for the implementation of the evaluation.

The UNODC IEU will provide quality assurance throughout the process by participating in the field missions and interviews as well as providing comments and clearance on the evaluation methodology, the draft report and the final clearance for the final evaluation report. IEU reviews and clears all deliverables of the evaluation.

#### 1. Roles and responsibilities of each team member

The evaluation team will consist of 4 full team members: the lead evaluator, the substantive expert with knowledge in the AML/CFT, a gender expert and one evaluation expert from IEU (as well as one back-up IEU staff member).

##### Lead evaluator:

The team leader will have the overall responsibility for the quality and timely delivery of all activities and reports and for liaising with the Independent Evaluation Unit (IEU) and with the UNODC Anti-Money Laundering (AML) and combating the finance of terrorism (CFT) Programme Manager as specified in these Terms of Reference.

- Carry out the desk review;
- Develop evaluation methodology, including sample size and sampling technique;
- Prepare the inception report incorporating the above components, in line with the guidelines and templates on the IEU website <http://www.unodc.org/unodc/en/evaluation/evaluation-step-by-step.html>;
- Incorporate comments received in the Inception Report (clearance by IEU);
- Conduct all interviews with the stakeholders;
- Lead and coordinate the evaluation process and oversee the tasks of the substantive expert (evaluation team member);
- Implement qualitative tools and analyze data;
- Triangulate data and test rival explanations;
- Ensure that all aspects of the terms of reference are fulfilled;
- Draft an evaluation report in line with UNODC evaluation policy and the guidelines and template on the IEU website <http://www.unodc.org/unodc/en/evaluation/evaluation-step-by-step.html>;
- Review and finalize the evaluation report on the basis of comments received;
- Include a management response in the final report;
- Prepare an Evaluation Brief (2-pager);
- Present the final evaluation findings and recommendations to stakeholders.

##### Substantive expert:

- Contribute with specific expertise in the area of money laundering and combating the finance of terrorism;
- Carry out the desk review;
- In collaboration with the Lead Evaluator, draft the inception report (in particular, the parts relevant to his/her expertise);
- Implement data collection tools and analyze data;
- Triangulate data and test rival explanations;

- In collaboration with the Lead Evaluator, draft an evaluation report (in particular, the parts relevant to his/her expertise) in line with the UNODC evaluation policy, guidelines and templates;
- Review and finalize the evaluation report on the basis of comments received;
- In collaboration with the Lead Evaluator, present the findings and recommendations of the evaluation as required.

Gender expert:

- Contribute with specific expertise in gender equality;
- Review the desk review materials in order to be informed about the specific needs of the two programmes regarding gender;
- Review and comment on the inception report in order to ensure that the methodology is gender-sensitive and inclusive and that the evaluation is best equipped to assess aspects of gender mainstreaming;
- Review data analysis and preliminary results in order to ensure that gender equality and human rights issues are taken into account and correctly interpreted;
- Review the draft evaluation report ensuring that gender mainstreaming is assessed appropriately;
- Provide feedback to the UNODC IEU how the gender mainstreaming can be included in future evaluations on the topic of AML/CFT.

2 IEU staff members:

- Provide quality assurance throughout the evaluation-process and oversee the process;
- Participate in field missions and interviews;
- Review all deliverables of the evaluation;
- Final clearance of all deliverables of the evaluation;
- Ensure that the evaluation is disseminated according to IEU guidelines;
- Ensure that the evaluation findings are shared simultaneously with management and external stakeholders as per the respective resolution and IEU guidelines;
- Ensure that recommendations are followed by an action plan, which will detail how and when recommendations will be implemented.

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.

## IX. MANAGEMENT OF THE EVALUATION PROCESS

The evaluation is managed by the Independent Evaluation Unit (IEU), which provides quality assurance through the provision of guidelines, formats, assistance, advice and clearance on key deliverables during the evaluation process. IEU further ensures that the evaluation conforms with the United Nations Evaluation Group (UNEG) Norms and Standards.

Roles and responsibilities of the Independent Evaluation Unit

IEU will participate in the selection of the proposed Evaluation Team and liaise with the evaluators. The IEU will comment on the evaluation methodology and provide methodological support

throughout the evaluation, including commenting on the draft report and endorsing the quality of the final report. The IEU will have the following functions:

- Contribute to the finalization of the evaluation ToR;
  - Contribute to the production of a clear, time bound work plan for the evaluation process;
  - Ensure endorsement of all steps (ToR, Selection, Inception, Draft/Final Reports) by all parties;
  - Clear the selection of the evaluation team;
  - Ensure the evaluation products meet UNODC/UNEG quality standards;
  - Provide clear specific advice and support to the evaluation stakeholders and the evaluation team throughout the whole evaluation process;
  - Ensure a fully inclusive and transparent approach to the evaluation;
  - Ensure the liaison and facilitate the relation with Core Learning Partners;
- Safeguard the independence of the exercise, including the selection of the evaluation team;
  - Review and clear all steps in the evaluation process: Terms of Reference; Selection of evaluator(s); Inception Report; Draft Evaluation Report; Final Evaluation Report; Evaluation Follow-up Plan.

#### Roles and responsibilities of the Core Learning Partnership

The Core Learning Partners (CLPs) will encourage a participatory evaluation approach by allowing its members to participate in and provide feedback on the evaluation process. The CLPs will be composed of UNODC senior management, beneficiary Governments, partner organizations, donors and beneficiaries of the Global Programmes. Please see the names and contact details of counterparts of the Core Learning Partners in Annex III.

The CLPs will work closely with the Programme Management/AML/CFT and the Evaluation Manager/IEU to guide the evaluation process, and it may be tasked with facilitating the dissemination and application of the results, and other follow-up action. Specifically they will also have the following functions:

- Take note of the selection of the Evaluation Team;
- Comment on key steps of the evaluation process, such as ToR, draft findings and draft inception and evaluation report;
- Facilitate the participation of those involved in the evaluation design;
- Facilitate the evaluation team's access to all information and documentation relevant to the intervention, as well as to key actors and informants who might be relevant to the evaluation;
- Participate in interviews, focus groups or other information-gathering methods;
- Disseminate the results of the evaluation.

The CLPs are different from key informants and general stakeholders of the programmes in the way that they are individuals selected on the basis of criteria such as knowledge, compatibility, age, experience, who provide information about specific aspects of evaluation.

#### Roles and responsibilities of the Project Manager

The UNODC Programme Management is responsible for the provision of desk review materials to the Evaluation Team. The UNODC/AML/CFT is responsible for the coordination in-house of the

compilation of the relevant background documents, commenting on the evaluation methodology, supporting IEU to liaise with the Core Learning Partners, commenting on the draft preliminary and final reports and reviewing factual errors, and developing a follow-up plan for the evaluation recommendations in a corporate manner.

- Managing the evaluation,
- Drafting and finalizing the ToR,
- Selecting Core Learning Partners and informing them of their role,
- recruiting evaluators following clearance by IEU,
- Providing desk review materials to the evaluation team including the full TOR,
- Reviewing the inception report as well as the evaluation methodology,
- Liaising with the Core Learning Partners,
- Reviewing the draft report for factual errors,
- Developing an implementation plan for the evaluation recommendations as well as follow-up action (to be updated once per year),
- Disseminate the final evaluation report and facilitate the presentation of evaluation results.

The Project Manager 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 of the evaluation team, including IEU staff member(s) (including travel details; DSA-payments; transportation; etc.)
- All logistical arrangement for the meetings/interviews/focus groups/etc. (including translator/interpreter; set-up of meetings; 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 evaluators need to be released within 5 working days after the respective deliverable is cleared by IEU).

For the field missions, the evaluation team liaises with the UNODC Regional/Field Offices and mentors as appropriate.

## X. PAYMENT MODALITIES

The evaluator(s) will be issued consultancy contracts and paid in accordance with UNODC rules and regulations. The contract is a legally binding document in which the evaluator agrees to complete the deliverables by the set deadlines. Payment is correlated to deliverables and three instalments are typically foreseen:

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

## ANNEX II. REVISED RESULTS FRAMEWORK/ EVALUATION MATRIX

**Overall Project Objective:** Assisted States build effective legal, regulatory and law enforcement capacity in compliance with anti-money laundering/ countering the financing of terrorism (AML/CFT) worldwide-accepted standards.

Specific Objective 1: Legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector aware of the negative economic and social impact of money-laundering and the financing of terrorism.				
Output	Outcomes	Performance indicator	Source of data	Method of collection
Output 3: AML/CFT policies and institutional frameworks, and possible links with existing anticorruption, good governance and antiterrorism policies reviewed and developed; Mentoring	AML/CFT regulatory and supervisory frameworks developed and implemented by financial and supervisory authorities and the private sector using UNODC-provided information or services of mentors	Number of regulatory frameworks developed using UNODC information or mentoring	- Reports to the CND on the number of Member States criminalizing money laundering produced; interviews and survey results used to identify direct links between assistance provided/ model laws used and amendments or laws passed	Content analysis; interviews with beneficiary jurisdiction; beneficiary survey results
Output 4: Reports to the Commission on Narcotic Drugs (CND) on the progress made by Member States to comply with the requirements of the UN Plan of Action to counter money	CND adopts resolutions taking into account reports.	Extent to which CND uses the report by taking into account negative economic and social impact of money-laundering and the	Resolutions of the CND	Content analysis



laundering provided;		financing of terrorism.		
Output 5: Basic information on money laundering provided and the proceeds of crime through the dissemination of the computer-based training (CBT)/ eLearning programme identified	Increase in the number of persons using the CBT/ eLearning	Number of officials provided with computer based training (CBT)/ eLearning programme, that use the training	Participants in expert group meetings OR Users of the CBT	Interviews and/or survey
Output 6: The online International Money Laundering Information Network (IMoLIN) maintained and upgraded;	IMoLIN used by intended users	Number and duration of visits and hits to the website.	Comments made by IMoLIN partner organizations on the annual report of IMoLIN produced by GPML; Records of the IMoLIN	Content analysis
Output 7: Studies on the vulnerability of informal economies to money-laundering and the financing of terrorism carried out.	Studies are used by targeted users	Extent of use	Users?	
<b>Specific Objective 2</b> (Former Outcome 2): Knowledge and expertise to combat money-laundering and the financing of terrorism effectively applied by legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector				

Training on AML/CFT legislation	AML/CFT Legislation developed by trained legislators and legislative personnel	Extent to which legislation is developed by persons trained by the project-	-Trainees	Surveys and interviews
Training courses, expert groups, mentoring	Former Output 1: Target groups participating in the projects activities have a higher level of awareness on germane aspects of money laundering and the financing of terrorism;	Extent to which awareness has changed over time (using 2011 Mid-term evaluation as the baseline)	Participants	Surveys and interviews
Output 2: Expert group meetings on specialized and complex aspects of AML/CFT issues conducted;	AML/CFT strategies and policies developed by criminal justice officials who participated in or read the reports of the expert group meetings and integrated into relevant strategies and policies	- Number of AML/CFT national action plans developed, reviewed and finalized by participants	National reports and observations	
AML/CFT model legislation prepared Tailored-made advisory services and other technical inputs relevant to the implementation	Model AML/CFT legislation adopted by legislative bodies in member-states	Number of legislative bodies that have adopted the suggested legislations	Legislative and public records	Review of records

<p>of international AML/CFT standards  Number of review of national AML/CFT national legislation  Number of legal advisory and needs assessment activities and legislative reviews successfully carried out</p>	<p>FIU established, financial investigations conducted and AML/CFT cases prosecuted with international standards applied by criminal justice officials</p>	<p>FIU established or not; number of countries that have established FIU   Number of investigations launched, cases prosecuted and conviction rate under new laws</p>	<p>Public records   National statistics</p>	<p>Review of records   Comparative analysis the assumption being that if the legislations are up to international standards, detection and conviction should improve over time and that this is different from a control group with non-intervention countries.</p>
<p>Advice and information/ guidelines on establishing FIU, conducting investigations, and prosecuting AML/ CFT cases  Training programmes for judges, prosecutors, law enforcement and FIU officials trained on effective prevention, detection and criminalization of money laundering and the financing of terrorism  Content of specialized services and technical</p>				

<p>assistance programmes to ensure that they adequately meet the specific needs of the recipient States reviewed on an ongoing basis</p>				
<p>Advice and information/ guidelines on preventive measures for regulatory and supervisory authorities and private sector firms</p>	<p>AML/CFT preventive measures applied by regulatory and supervisory authorities and the private sector</p>	<p>Number of regulatory and supervisory authorities that have adopted preventive measures as suggested Extent to which private sector firms have adopted preventive measures as suggested</p>	<p>Public records/ interviews  Interviews &amp; surveys</p>	<p>Review of records, random sample survey instrument Interviews on field missions, online survey with stratified random sample</p>
<p>Training materials and courses based on assessment of need and sustainability Sustainable training programmes on detection, prevention and criminalization of money-laundering and the financing of terrorism developed Mentors /advisors posted in the field providing</p>	<p>Member-states are self-reliant in training their regulatory, supervisory, criminal justice, and private sector professionals</p>	<p>Extent to which member-states carry out their own training programmes  Extent of policy advice and technical support provided by mentors to the target groups Extent of inputs provided by mentors to UNODC</p>	<p>UNODC/ Member-state records (supplemented by interviews?)  Target group  UNODC staff</p>	<p>UNODC/ Public records  Interviews and survey  Interviews</p>

continuous policy advice, on-the-job training, and other technical support to target groups.		programmes and projects		
<b>Specific Objective 3</b> (Former Outcome 3): AML/CFT coordination and cooperation <i>increased</i> among Member States, International Organizations and AML/CFT regional bodies.				
Output that call for or organizes technical assistance coordination meetings at different levels	Increased Number of technical assistance coordination meetings, and results thereof	Number of technical assistance coordination meetings, and results thereof	Project records	Record analysis and content analysis
Output 1: UNODC tools and services on international cooperation, mutual legal assistance, law enforcement, antiorganized crime, good governance and counterterrorism promoted and disseminated;	Exchange of information and AML/CFT coordination among international organizations improved	Positive Feedback by Secretariat of the FATF and other standard setters		
Output 2: Inputs to the development of new international cooperation mechanisms provided;	New mechanisms developed for facilitating international cooperation that use project outputs	Number of new mechanisms developed	Project records	Record analysis
Output 3: Collaboration with the Financial Action Task Force (FATF) and other	Increased number of inputs to FATF and other standard setters'	Number of inputs to FATF and other standard setters' AML/CFT	FATF reports	Content analysis

standard setters and technical assistance (TA) providers increased;	AML/CFT papers, reports and studies that are used by the FATF and other Standard setters	papers, reports and studies		
Input to proposed joint projects	Increased Number of joint projects and initiatives with the FATF and other standard setters;	Change in the Number of joint projects and initiatives with the FATF and other standard setters	Project records	Record analysis
Input to the FSRBs	Output 4: The FATF-Style Regional Bodies (FSRBs) as the platforms for technical assistance coordination utilized;	Extent of utilization	FSRBs	Interviews
Output 5: Substantive inputs to the work and reporting requirements of the working group on “Tackling the Financing of Terrorism” provided.	Working group on “Tackling the Financing of Terrorism” uses inputs	Number (or proportion) of inputs that are used	Reports of the working group	Content analysis
Substantive inputs to the work and reporting requirements of the CTITF” provided	Increased use by CTITF of inputs provided	Number of CTITF working group meetings, reports produced and feedback received from	CTITF reports; CTITF members	Content analysis, interviews, records review

other CTITF  
members

## ANNEX III. DATA COLLECTION STRATEGY

<b>Design &amp; relevance:</b>	
1. To what extent is the programme relevant to international efforts in combatting money laundering and terrorism financing at country, regional and global level? Did the implementation of the recommendations of various mid-term evaluations, at global and regional levels, lead to improved design and/or implementation of the programme?	Desk review, Stakeholder interviews, Survey of beneficiaries
2. To what extent are the outputs, outcomes and objectives of this programme relevant to implementing the Sustainable Development Goals, including SDGs 16.4 and 5?	Desk review, Stakeholder interviews, Survey of beneficiaries
3. To what extent have human rights principles been integrated into the design and implementation of GPML? To what extent have these principles for inclusion of men, women and marginalised groups into programme activities been mainstreamed?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
<b>Effectiveness:</b>	
4. To what extent has the GPML achieved or is likely to achieve its objectives and expected outcomes? How well do the organizational and communication structure employed by the GPML contribute to fulfil the mandate of the GPML?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
5. How has the organisational and governance structure of GPML facilitated human rights and gender parity? What measures have been taken during planning and implementation to ensure that gender aspects were mainstreamed? How can the approach to gender be improved in the activities of the programme?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
<b>Efficiency:</b>	
6. What measures have been taken during the planning and implementation of the GPML to ensure that resources are used in an efficient, transparent and accountable manner? How have UNODC systems such as Umoja affected the efficiency of the programme? Would introduction of the Full Cost Recovery considered to affect the efficiency of the programme?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
<b>Impact:</b>	
7. To what extent has the GPML contributed, or is likely to contribute, to long-term impact for its beneficiaries, target groups, communities involved, excluded groups, and institutions related to the programme? What are its unintended positive and negative effects on Money Laundering and the Financing of Terrorism, with special attention to effects that may have hindered human rights and gender equality? What, if any, are its contributions to the Sustainable Development Goals?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
<b>Sustainability:</b>	
8. To what extent are the results (outcomes and impact) generated through the activities likely to be sustained in the countries if the GPML were to discontinue in near future? This question includes examining the extent to which the programme stakeholders and	Desk review, Content analysis, Stakeholder interviews, Archival



beneficiaries have taken ownership of the results, activities, and goals of the programme, and whether they are committed to continue working towards these results after implementation of the activities.	data, Survey of beneficiaries
<b>Partnerships and cooperation:</b>	
9. How does GPML coordinate with other donor funded projects to create effective coordination and a formal/informal division of labour? Has GMPL identified areas where the programme has a strategic advantage or identified areas where other partners should lead?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
10. Has GPML effectively leveraged joint initiative opportunities with other United Nations entities (including UNODC Field Offices) and other anti-money laundering bodies throughout the world? To what extent is the programme the appropriate mechanism to promote international cooperation to prevent and combat money laundering and financing the terrorism?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries
<b>Lessons learned/ Innovations:</b>	
11. What lessons and best practices can be drawn from GPML's engagement with target beneficiaries such as legislators, prosecutors, FIU analysts and law enforcement officials during the local capacity building joint collaborations?	Desk review, Content analysis, Stakeholder interviews, Archival data, Survey of beneficiaries

## ANNEX IV. DESK REVIEW LIST

1. A-RES-60-178
2. A-RES-60\_L.62
3. A58\_253e
4. CND Resolution\_52\_9
5. CTITF\_financing\_ENG\_final
6. Contacts Table FATF
7. Donor briefing GPML 2016 full
8. Evaluation Questionnaire Zanzibar Workshop Summary
9. Evaluation Questionnaire Zanzibar Workshop
10. Evaluation recommendations - Implementation plan
11. FIU Analyst Training Course Evaluation Forms (for around 15 workshops)
12. FI\_Agenda\_Ecuador - Rick version
13. Fac Guide extracts\_Financial Investigation
14. Final Report on the Mid-term Evaluation of GPML 2011
15. Financial Intelligence and Analyst Courses
16. Financial Overview of GLOU40
17. UN General Assembly resolutions
18. GLOU40 Project Document
19. GLOU40-Mekong region evaluation report\_31JAN2017
20. GLOU40 Annual and Semi-annual Progress Reports for 2009-2016
21. GLOU40 Non-Substantive Project Revision 2009 document
22. GLOU40 Project Revision 2009
23. GPML Activity Reports 2006-16
24. GPML Brochure
25. GPML Fact Sheets FINAL
26. GPML Training Requirements
27. GPML In-depth Mid-term Evaluation report, 2011
28. International Convention for the Suppression of the Financing of Terrorism
29. Jamaica Regional Workshop Evaluation
30. Jamaica Regional Workshop Evaluation
31. Model legislation on ML and Financing of Terrorism
32. Model Provisions Final for common law legal systems
33. Overview UN Conventions
34. PALP Quarterly Reports
35. PEP Report
36. PROJECT REVISION\_GLOU40\_2008-2015
37. Presentation annotated example
38. Enhanced Training Program: FIU Analysis, Large Data Volume Analysis,
39. Financial Investigations
40. SCR1267
41. SCR1373
42. SCResolution\_1735(2006)
43. SC\_RES\_1617
44. SC\_RES\_1803(2008)
45. Strategy - GPML Future Directions Document Fin updated Aug 2012
46. Thematic Debate-Note.rev.2-Jan18\_final
47. Training Methodology/
48. UN Resolutions, UNGASS Declarations, etc.
49. United Nations Convention Against Transnational Organized Crime and the Protocols Thereto
50. UN Convention Against Corruption
51. V0789208-Fifth report of the Executive Director on ML
52. GPML newsletters, 2011-2017

53. Other documents reviewed:
- a. Kiely Barnard-Webster (2016) Are women less corrupt? (CDA Perspectives)
  - b. Louis de Koker (2015) With increased anti-money laundering measures, banks are shutting out women (The Conversation)
  - c. Ana Inés Abelenda (2016) Combatting illicit financial flows: Why we need a gender lens (AWID)
  - d. Giovanni Fiandaca, (2007) Women and the Mafia: Female Roles in Organized Crime Structures
  - e. (2017) Guiding Document Gender Responsive Evaluation at UNODC
54. UNEG, (2014) Integrating Human Rights and Gender Equality in Evaluations

**ANNEX V. STAKEHOLDERS CONSULTED FOR THE EVALUATION**

<i>Number of interviewees</i>	<i>Organisation</i>	<i>Country</i>
17 (7 F / 10 M)	UNODC HQ	Austria
2 (M) 1 (F)	UNODC – Regional office	South Africa
4 (F) 2 (M)	UNODC – Regional office	Panamá
3 (1 F / 2 M)	UNODC – Field office	Colombia
1 (M)	UNODC – Regional office	Senegal
1 (M)	UNODC – Field office	Samoa
1 (M)	National counterparts, FIU	Cyprus
1 (F)	National counterparts, police and narcotics	Cyprus
3 (F) 1 (M)	National counterparts, FIU	Panama
1 (M)	National counterparts, boarder control	Panama
1 (M)	National counterparts, Ministry of Justice	Colombia
3 (M) 1 (F)	National counterparts, non-financial sector	Colombia
1 (F)	National counterparts, boarder control	Colombia
1 (M) 2 (F)	National counterparts, judiciary / prosecutors	Colombia
1 (M)	National counterparts, FIU	Colombia
1 (M)	National counterparts, financial controller	Colombia
1 (M)	National counterparts, financial sector	Colombia
1 (M)	Independent expert	Colombia
1 (M)	National counterparts, FIU	Costa Rica
1 (M)	National counterparts, FIU	South Africa
5 (1 F / 4 M)	National focal persons in countries not physically visited	Burkina Fasso
1 (M)	National focal persons in countries not physically visited	Ghana
1 (F)	National focal persons in countries not physically visited	Namibia
1 (M)	National focal persons in countries not physically visited	Botswana
1 (M)	National focal persons in countries not physically visited	Lesotho
1 (M) 1 (F)	National focal persons in countries not physically visited	Kenya
1 (M)	National focal persons in countries not physically visited	Uganda
1 (M)	National focal persons in countries not physically visited	Mauritius
1 (M)	National focal persons in countries not physically visited	Ethiopia
2 (1 F / 1 M)	National focal persons in countries not physically visited	Moldova
2 (1 F / 1 M)	Implementing partner, IMF	USA
1 (1 M)	Implementing partner, The World Bank	USA
1 (M)	Implementing partner, FATF	France
1 (M)	Implementing partner, EAG	Russia
1 (M)	Implementing partner, MONEYVAL	Lichtenstein
2 (M)	Implementing partner, ESAAMLG	Tanzania
2 (1 F / 1 M)	Implementing partner, goAML user group	The Netherlands
1 (F)	Donors	USA
1 (F)	Donors	Russia
1 (F)	Donors	Colombia
1 (M)	Donors	Kenya
1 (F)	Donors	South Africa
1 (M)	Bellwether	South Africa
1 (M)	NGO on financial inclusion	USA
Total: 78 (24 Females, 54 Males)		

## **ANNEX VI. EVALUATION TOOLS: INTERVIEW & SURVEY PROTOCOLS**

### ***A. Questions for country counterparts and beneficiaries***

1. Which services or products that GPML provides are you aware of?
2. What type of assistance has GPML provided to your country? Any product/assistance you would have welcomed but was not provided?
3. Has your legislature adopted AML/CFT legislation since 2011? Would you say this legislation is gender sensitive? (Why yes or not)
4. Was GPML's model legislation used? Has GPML's mentor assisted in the drafting? What was the value of it?
5. Have officials in your country received any AML/ CFT related training since 2011? (follow up to find out sex disaggregated data when possible)
6. To what extent has GPML been involved? What was the value of GPML's training? / How have you used it?
7. How have GPML mentors helped you in setting up AML/CFT policies and procedures?
8. How has IMoLIN website, AMLID database or 'goAML' and 'goCASE' software been useful to you? Any areas of research you missed in these tools?
9. Overall, have you been satisfied with the assistance provided by GPML? (why?)
10. Has the TA been provided according to your needs?
11. Do you see any long-term effects of the assistance provided by GPML?
12. In your opinion, has GPML effectively contributed to improved local AML/CFT capacity?
13. Has GPML contributed to making your country's AML/CFT measures more effective? (why yes or why not?)
14. Which other factors have contributed to an improved AML/CFT regime in your country?
15. Do you know of other providers of the type of assistance GPML provides?
16. In your opinion, what makes GPML's assistance unique? What are GPML's strengths? What do you see as the main added value provided by GPML staff and mentors?
17. How could GPML improve its services and products?
18. Did you or your organization participate in the typologies related APG meetings (or ESAAMLG or FATF) in the last five years?

19. Have you used GPML databases, training material or assistance in preparing APG (or ESAAMLG or FATF) relevant papers, reports and studies? How?
20. Have GPML mentors assisted in the preparation for Mutual Evaluations? How?
21. Are GPML staff and mentors providing relevant input at the APG (or ESAAMLG or FATF) meetings? How?
22. what aspects of HRG are you aware of that are particular important in the field of AML?

### ***B. Questions for mentors and advisors***

1. How would you describe the setup of your cooperation with GMPL staff at headquarters, other UNODC staff at headquarters and UNODC field office staff?
2. To what extent do you consider the material and support provided by GPML staff at headquarters useful to your work? How could it be improved?
3. To what extent do you consider the support provided by other UNODC staff at headquarters useful to your work? How could it be improved?
4. To what extent do you consider the support provided by UNODC field offices useful to your work? How could it be improved?
5. Do the working arrangements (contract, remuneration etc.) provide a good basis for carrying out your assignment? What should be improved?
6. To what extent do you work with staff from other organizations of the UN system?
7. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
8. How would you characterize your cooperation with partner organizations and other providers of TA in the field of AML/CFT?
9. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
10. How would you characterize your cooperation with country counterparts?
11. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
12. What do you consider to be the main results you have helped make happen through your mentoring or as an advisor? (break it down by time and country)
13. How do you keep track of outcomes that your work made happen?
14. What do you consider the main obstacles to achieving results?
15. How could those obstacles be overcome?
16. Do you see any long-term impact of GPML? Please describe.
17. What are the strengths of GPML, compared to providers of TA in the same field?
18. What are the weaknesses of GPML, compared to providers of TA in the same field?

19. In your opinion, what should be improved?
20. If you worked for UNODC before 2011, what has changed since then?
21. What HRG aspects are relevant for your work or which ones have you encountered in your work?

***C. Questions for representatives of partner organizations***

1. What type of cooperation and interaction have you experienced between your organization and GPML and UNODC since 2011?
2. Which lessons learned could be drawn from this experience?
3. Which services or products that GPML provides are you aware of?
4. Do you know of other providers of the type of assistance GPML provides?
5. In your opinion, what makes GPML's assistance unique? What are GPML's strengths? What do you see as the main added value provided by GPML staff and mentors?
6. In your view, how could GPML improve its products and services?
7. Is GPML contributing to improved harmonization among TA providers in the field of AML/CFT? How?
8. In your opinion, has GPML effectively contributed to improved local AML/CFT capacity?
9. Would you say that GPML has effectively contributed to improving the AML/ CFT regime in the countries of the region? How and to what extent?
10. Which other factors have contributed to an improved AML/CFT regime in the countries of the region?
11. Did you or your organization participate in the typologies related APG meetings (or ESAAMLG or FATF) in the last five years?
12. Are you using GPML databases or documents for preparing APG (or ESAAMLG or FATF) relevant papers, reports and studies? How?
13. Are GPML staff and mentors providing relevant input at the APG (or ESAAMLG or FATF) meetings? How?
14. To what extent have the results of the IIWG (SIP) Framework Pilot Workshop, Kuala Lumpur, 1- 4 April 2008 been used by countries? Was the role of GPML recognized?
15. What HRG aspects are relevant for your work or which ones have you encountered in your work?

## ***D. Survey questionnaires.***

An online preview of the survey questions administered online, at FATF private sector forum in Vienna, and ESAAMLG forum in Arusha respectively is available [here](#).



## ANNEX VII. SUPPLEMENTARY EVIDENCE ON RESULTS

INCSR 2017 Volume II

Country Reports

### Comparative Table

“Y” is meant to indicate that legislation has been enacted to address the captioned items. It does not imply full compliance with international standards. Please see the individual country reports for information on any deficiencies in the adopted laws/regulations.

Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (Y/N)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Int'l Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
<b>Govt/Jurisdiction</b>														
<b>Afghanistan</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
<b>Albania</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Algeria</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Antigua and Barbuda</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Argentina</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Aruba<sup>2</sup></b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
<b>Azerbaijan</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Bahamas</b>	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Barbados</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y
<b>Belize</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Benin</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
<b>Bolivia</b>	Y	Y	Y	Y	Y	Y	N	Y	N	Y	Y	Y	Y	N

<sup>2</sup> The Netherlands extended its application of the 1988 UN Drug Convention to Aruba, Curacao, and Sint Maarten and the UN Convention against Transnational Organized Crime to Aruba.

INCSR 2017 Volume II

Country Reports

Actions by Governments															
	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (YPN)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.	
<b>Govt/Jurisdiction</b>															
<b>Bosnia &amp; Herzegovina</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	
<b>Brazil</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	
<b>British Virgin Islands<sup>3</sup></b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	
<b>Burma</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N	
<b>Cabo Verde</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N	
<b>Cambodia</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	
<b>Canada</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	
<b>Cayman Islands<sup>3</sup></b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	
<b>China</b>	Y	Y	Y	Y	Y	Y*	N	Y	N	Y	Y	Y	Y	N	
<b>Colombia</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
<b>Costa Rica</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	
<b>Cuba</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	N/A	Y	Y	Y	N	
<b>Curacao<sup>2</sup></b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	
<b>Dominica</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	
<b>Dominican Republic</b>	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	Y	Y	
<b>Ecuador</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
<b>Egypt</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	

<sup>3</sup> The UK extended its application of the 1988 UN Drug Convention to British Virgin Islands and Cayman Islands. The UNCAC has been extended to British Virgin Islands. The UNTOC has been extended to British Virgin Islands and Cayman Islands.

## INCSR 2017 Volume II

## Country Reports

Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (YPN)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
	Govt/Jurisdiction													
<b>El Salvador</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Georgia</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Ghana</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Grenada</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Guatemala</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
<b>Guinea-Bissau</b>	Y	Y	Y	Y	N	Y*	Y	Y	Y	Y	Y	Y	Y	N
<b>Guyana</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	Y
<b>Haiti</b>	Y	Y	Y	Y	N	Y*	Y	Y	Y	Y	Y	Y	Y	N
<b>Honduras</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Hong Kong<sup>4</sup></b>	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>India</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Indonesia</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Iran</b>	Y	Y	Y	Y	Y	Y*	N	N	N	N/A	Y	N	Y	N/A
<b>Iraq</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
<b>Italy</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Jamaica</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Kazakhstan</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Kenya</b>	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	Y	Y
<b>Korea, Dem. People's Rep.</b>	Y	N/A	N/A	N/A	N/A	N/A	N	N/A	N/A	N	Y	N	N	N

<sup>4</sup> The People's Republic of China extended the 1988 UN Drug Convention, the UNTOC, and the UNCAC to the special administrative region of Hong Kong.

INCSR 2017 Volume II

Country Reports

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<b>Kyrgyz Republic</b>	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	N
<b>Laos</b>	Y	Y	Y	N	Y	Y*	Y	N	N	Y	Y	Y	Y	N
<b>Lebanon</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Liberia</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
<b>Malaysia</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
<b>Mexico</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Morocco</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Netherlands</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Nicaragua</b>	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
<b>Nigeria</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
<b>Pakistan</b>	Y	Y	Y	Y	Y	Y*	Y	N	N	Y	Y	Y	Y	Y
<b>Panama</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Paraguay</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
<b>Peru</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>Philippines</b>	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
<b>Portugal</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>Russia</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
<b>St. Kitts and Nevis</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>St. Lucia</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
<b>St. Vincent and the Grenadines</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
<b>Senegal</b>	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N

Source: The United States Department of State, Bureau for International Narcotics and Law Enforcement Affairs, in its 2017 International Narcotics Control Strategy Report. Available at: <https://www.state.gov/documents/organization/268024.pdf>.

## ANNEX VIII: Summary recommendations of the 2011 midterm evaluation

Recommendation	Implementation status
<p>Recommendation 1: UNODC’s senior management should continue the programme and give it more priority in order to make best use of its developed reputation networks and experience and the comparative advantage of a United Nations programme which is perceived as a global player and as more impartial and aware of regional characteristics than other AML/CFT technical assistance providers.</p>	<p>Accepted. Completed by April 2011 (as per project documents).</p>
<p>Recommendation 2: UNODC’s senior management should consider the cross cutting nature of AML/CFT and the limitations resulting from the positioning of GPML under one of the convention related branches and take steps to ensure its organizational visibility and its ability to assist other conventions and effective centralized quality control of AML/CFT related UNODC projects.</p>	<p>Accepted. Completed by the last quarter of 2011 (as per project documents).</p>
<p>Recommendation 3: GPML should prepare a long-term strategic plan for the period 2011-2015 in coordination with senior management and in consultation with relevant UNODC sections at headquarters and in the field. Human and financial resources needed to implement the plan as well as future modalities of key stakeholder involvement should be clarified. The strategic plan once agreed should be consulted with donors.</p>	<p>Accepted. Completed by Sep 2011 (as per project documents).</p>
<p>Recommendation 4: GPML should sustain and intensify the “mentoring programme” with mentors or long-term consultants servicing several countries in a region while ensuring that the number of countries covered by each mentor or long-term consultant allows for longer periods of time in each country and for a focus on countries where law enforcement is the priority. The detailed planning should be based on the</p>	<p>Accepted. Completed by Dec 2011 (as per project documents).</p>

<p>long-term strategic plan and should include provisions for headquarters' quality control.</p>	
<p>Recommendation 5: UNODC's senior management should aim at a sufficient long-term core funding for GPML if possible from the regular budget of the organization in order to ensure the sustainability of the programme and its ability to adequately manage the global aspects of AML/CFT as well as ensure coordination quality control and consistency for UNODC's AML/CFT activities in the field. To the extent that funds can be provided from the regular budget of the United Nations this should be included in the budget proposals for 2012-2013.</p>	<p>Accepted. No completion date (as per project documents).</p>
<p>Recommendation 6: GPML and UNODC field offices should continue to focus on increased and more formalized communication to ensure regional integrated programming as well as quality control and consistency of all AML/CFT related UNODC projects. Regional advisors for AML/CFT jointly funded by GPML and Regional Offices should support coordination and programming while GPML mentors should continue to focus on in-depth AML/CFT capacity- building in selected countries. Clear and effective reporting structures need to be set up between mentors and UNODC offices in the field and GPML headquarters ensuring that field representatives are kept informed and GPML can carry out its oversight function.</p>	<p>Accepted, but ongoing (as per project documents).</p>
<p>Recommendation 7: UNODC's senior management should designate GPML as a formal point of contact for partner entities like World Bank and IMF for all AML/CFT related matters including corruption asset recovery and terrorism prevention in order to ensure that GPML is informed about and able to contribute to initiatives relevant to AML/CFT.</p>	<p>Accepted. Completed by Apr 2011 (as per project documents).</p>
<p>Recommendation 8: GPML should put more focus on promoting its various valuable products like tools publications the IMoLIN website and AMLID database as well as its AML/CFT Computer Based Training and should continue to jointly promote the goAML software for Financial Intelligence Units developed by UNODC's Information Technology Service.</p>	<p>Accepted. Completed by Apr 2013 (as per project documents).</p>

<p>Recommendation 9: GPML should use its strategic plan for the period 2011-2015 as the basis for acquiring and recording results data more systematically. It should ensure that all relevant information particularly on outcome level results related to its activities is readily available for coordination oversight and knowledge management. This information should also include a database of all counterparts/beneficiaries and partners and mentoring related lessons learned.</p>	<p>Accepted. Completed by Dec 2011 (as per project documents).</p>
<p>Recommendation 10: GPML should continue to proactively seek to improve coordination among technical assistance providers through measures like newsletters bilateral meetings and joint activities and in addition through a more formalized cooperation with partner organizations and lobbying for the institutionalization of meetings for technical assistance providers and beneficiary FIUs in order to coordinate harmonize and finalize their assistance plans in the margins of FATF, Egmont Group and FSRB meetings.</p>	<p>Accepted. Partly completed, partly ongoing. (as per project documents).</p>
<p>Recommendation 11: GPML should identify centres of excellence and best practice examples in all regions and use its ‘prosecutor placement programme’ as a model for fostering learning and networking between various law enforcement agencies including Financial Intelligence Units of different countries and regions and for improving cross—border cooperation.</p>	<p>Accepted. Completed by May 2012 (as per project documents).</p>