

Independent formative In-depth evaluation of the
Western Balkans Counter-Serious Crime Initiative (WBCSCi) in the context of the Integrative Internal Security Governance (IISG) mechanism including the European Union action: “Instrument for Pre-Accession Assistance (IPA II) Multi-Country Action Programme 2017 - Support to the Western Balkan Integrative Internal Security Governance”

Western Balkans

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The Independent Evaluation Unit of the United Nations Office on Drugs and Crime can be contacted at:

United Nations Office on Drugs and Crime
Vienna International Centre
P.O. Box 500
1400 Vienna, Austria
Telephone: (+43-1) 26060-0
Email: unodc-ieu@un.org
Website: www.unodc.org

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ABBREVIATIONS AND ACRONYMS

<i>Abbreviation</i>	<i>Full name</i>	<i>Abbreviation</i>	<i>Full name</i>
CEPOL	The EU Agency for Law Enforcement Training	iPA	Integrative Plan of Action
CSO	Civil Society Organisation		
DCAF	Democratic Control of Armed Forces	JHA	Justice and Home Affairs
DG NEAR	European Commission– Directorate-General for Neighbourhood and Enlargement Negotiations	OCG	Organised Crime Groups
EMG	Evaluation Management Group	PCC SEE	Police Cooperation Convention for Southeast Europe
EU	European Union	SOC	Serious Organised Crime
Eurojust	The European Union’s Judicial Cooperation Unit	ToR	Terms of Reference
Europol	The European Union’s Law Enforcement Agency	UNODC	United Nations Office on Drugs and Crime
HRGE	Human Rights and Gender Equality	WB	Western Balkans
IEU	Independent Evaluation Unit of UNODC		
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit – German Development Agency	WBBSi	Western Balkan Border Security Initiative
IISG	Integrative Internal Security Governance	WBCSCi	Western Balkan Counter Serious Crime Initiative
iPA	Instruments of Pre-Accession	WBCTi	Western Balkan Counter-Terrorism initiative

MANAGEMENT RESPONSE: IISG SUPPORT GROUP

The Management Team of the Integrative Internal Security Governance (IISG) as the mechanism and policy process representing the overarching concept of the Western Balkan Counter Serious Crime Initiative (WBCSCi), would like to express its gratitude to the evaluation team, Mr Punit Aurora, Mr Jim Newkirk, Ms. Eleni Tsingou, Mr. Peter Allan, Mr Emanuel Lohninger¹ and Ms Katherine Aston², under the guidance and supervision of Ms. Katharina Kayser³, for their great efforts on evaluating the WBCSCi in the context of IISG mechanism, incl. the EU Action IPAI2017 (Support to the Western Balkan Integrative Internal Security Governance, hereinafter: “the Action”). This evaluation has been innovative in terms of conducting it at this strategic level, setting thereby a best practice for similar initiatives. It also constitutes a baseline against which IISG as well as other future evaluations can and should be conducted, allowing also for comparison and measuring of change. Furthermore, the political ownership of the evaluation as well as its results (the M&E framework had been approved by the IISG Board and is being familiarised with the results) constitute an excellent practice.

The Interim Evaluation Report was requested by the IISG leadership at the time of drafting the Action – it was intended to contribute to improvements of this unique process, and we are convinced that the findings and follow-up will enable us to achieve our mission and future impact. The Report is now being presented to the members of the 3rd IISG Board.

The evaluation process itself has offered space for honest, open dialogue and exchanges, supporting learning and building trust. This and the insightful contributions from the Core Learning Partners led to actionable recommendations. We are hereby also extending a special thanks to the Core Learning Partners and all other stakeholders for contributing their valuable time to the evaluation exercise during 2018. The Management Team would also like to express its preparedness to address, in the best way possible and in close consultation with Beneficiaries and all Partners, the set of recommendations in the next year, and look forward to the next phase of evaluation.

The Report highlights the role of the IISG as it has been realised so far, throughout the beginning phase of the IISG following the official launch by the IISG Board on 8 September 2017. The Report provides findings as to both the IISG as the overarching mechanism on the one hand, and the WBCSCi and the Action (IPAI2017) on the other hand. It is our estimate that the evaluation team fully comprehended the *complex structure of the Action*, which supports, through individual strands of GIZ, CILC, MoI Italy, UNODC, CEPOL and Europol (our respected partners with extensive experience in the region and unparalleled track record as to their contributions to policy reform and cooperation in the Western Balkans), nothing less than a *fully integrated* assistance to the Western Balkans. These strands, through our cooperation with their leaders, have placed their activities in the context of the ongoing WBCSCi Integrative Plan of Action 2018-2020, thus vesting their trust in the IISG mechanism to play its role.

¹ UNODC Independent Evaluation Section

² UNODC Independent Evaluation Section

³ UNODC Independent Evaluation Section

We are grateful that the Report demonstrates a deep understanding of the *complexities surrounding the concepts involved* in the subject matter, incl. the EU accession focus along with security cooperation and reform in the Western Balkans, (external) technical assistance to the Western Balkans, all contributing to policy development in different thematic areas, and also, on the other hand, to EU-Western Balkan relations.

These concepts are not mutually exclusive. A long-term sustainable result of their underlying efforts require, in our opinion, the IISG to evolve further, as a regionally-owned mechanism providing space and expert support to discuss and deliver policy-level, operational and strategic solutions coordinated at all levels with all relevant partners, incl. the EU, which will enable greater sustainability of all actions – those of policy reform, capacity-building, technical assistance, support to cross-border (incl. EU-Western Balkan) cooperation, achieving EU legal and practical standards in relevant thematic areas, and their operationalisation.

This we see to be in the interest of all sides, incl. all IISG Partners and Observers, but especially the Beneficiaries who constantly devote *their own resources* to external actions on the ground. We had recognised that such a mechanism would, in addition, fill the gaps in vertical coordination within the Beneficiaries’ competent authorities, whose absorption capacities have often been disregarded. A legitimate and sustainable policy tool would be offered to the EU to be used to demonstrate *unified action* toward the Western Balkans, and to support the right solutions and targeted actions in the Western Balkans.

The above considerations remain completely in line with the initial findings of the 2014 Gap Analysis⁴ that led to proposing the WBCTi and IISG at the EU level in the first place. The IISG was developed out of identified needs, and we welcome the evaluators’ finding that the *right needs* had been identified by the IISG leadership. Also, that a foundation had been laid so far and relevance established for working toward greater effectiveness.

However, in this Management Response, the Management Team would like to focus mainly on the *weaknesses and opportunities* as established by the Report – referring to the IISG at large, the challenges it has faced in terms of effectiveness and sustainability. We would hereby like to note that, at this crucial time, the future developments and opportunities as far as IISG is concerned are not only depending on our own ideas or capabilities.

After only fifteen months of its existence, the IISG is characterised as a *‘start-up’*, which has identified the right customer needs and is growing. According to the evaluators, the IISG appears to be contributing to increased informal coordination and collaboration, leading to reduced duplication and increased efficiency of resource use for countering SOC in the Western Balkans. There is preliminary evidence for enhanced regional cooperation and collaboration, closer engagement with the Beneficiaries’ needs, and reduced duplication. With a low budget (as concurred by the Report), we have taken on as much as we could, and more. There is no argument, however, that there are *insufficiencies*, ones which could also be addressed via adapting the IISG structure. We have been answering to the IISG Board, where the Beneficiaries have the main say, but the core staff of the IISG Support Group (otherwise open in membership) has remained very small, comprising of few motivated and integer professionals.

⁴ Report on Gap Analysis on Regional Cooperation in the Area of Migration Management and Fight Against Serious and Organised Crime, available at RCC website: <https://www.rcc.int/docs/366/report-on-gap-analysis-on-regional-cooperation-in-the-area-of-migration-management-and-fight-against-serious-and-organised-crime>

a. Institutional development and financial sustainability

The report finds the need for institutional development as the *next step*. We fully agree that systematisation, enabled by institutional development of the IISG, would further enrich regional ownership by offering space for comprehensive policy-level debates, cross-cutting solutions, consistent monitoring and evaluation, standing communication, coordination and overall more systematic work based on a carefully designed methodology, which would not be dependent entirely on the core staff of the Support Group – it would achieve the initially desired inclusivity in practice, joining the Beneficiaries, Lead Partners, IISG Partners and the core staff as a single group, i.e. a supporting structure based on partnership and trust. A key concern linked to this is financial sustainability. The Management Team would like to announce that further discussions in this regard will be conducted later, as the European Commission is to become engaged intensively in the process, and they have so far been the main financial supporter of the IISG.

b. Business processes

The IISG Support Group at this time does not have the capacity to carry out methodologically-supported and *regular, comprehensive mapping, analyses and in-depth coordination of all external assistance actions* targeting the above-mentioned concepts. The need for this, however, has been vocalised to us during the last year many times over, both by international and EU partners themselves. Our Integrative Plans of Action have, however, served well as a periodical overview as they have provided such a sustainable tool of coordination for the first time, and we look forward to the opportunity to perfect the methodology together with the Lead Partners.

The IISG Support Group core staff has also been unable to maintain *regular communication with partners* due to same reasons. But we would like to state that it has been possible to find joint policy proposals and also practical solutions, such as a possibility for funding of an event, together with those partners who have remained active and have remained involved in IISG by appointing a representative just for this purpose.

Thirdly, our proposal in the next year is to add an additional focus of the IISG, i.e. a *thematic focus*, which would be complemented by IISG coordination at the *national level* – in order to enhance coordination and maintain regular communication. In the area of P-CVE, we will achieve this very soon with the first national IISG coordination meeting in April 2019, planned in accordance with the recommendations of the EU-IISG Network of National P-CVE Coordinators (RNNC). Such thematic focus of IISG, along with nation-level coordination put to practice on a regular basis, and a standing presence of relevant EU Delegations (in addition to all international, EU and regional partners) will also add to the effort of enhancing IISG visibility, the understanding and awareness of a critical mass of experts, practitioners, international affairs professionals.

c. Customer needs and ‘proof of concept’

The independent evaluation concurs that the IISG is widely recognised as a tool for EU action in the Western Balkans on part of the various stakeholders contributing to the evaluation exercise. It also finds that the IISG is “specifically relevant to the plans and priorities of the European Commission in and for the Western Balkans”. Further it finds that the IISG setting offers an opportunity for better engagement with and among all Western Balkan Beneficiaries. The IISG Support Group has vested great efforts during 2017-2018 as to raising awareness, and informing representatives of the EU in regional meetings, incl. via ad hoc bilateral consultations initiated by the IISG, on the existing opportunities. The Management did not yet complete the process of full alignment of the future mission and objectives with the EU, and looks forward to new opportunities to engage.

The Management Team fully supports the conclusion made by the Report that the larger objective of IISG, related both to a. EU accession focus and b. strengthening law enforcement, needs to be further addressed at the level of the EU together with the IISG Board. Indeed, until this is not addressed sufficiently, the issue of long-term sustainability of IISG lies at risk.

The next joint step in this direction can facilitate processes by which the EU, the IISG and the Beneficiaries together can achieve better results with the help of the IISG mechanism. The Report has recognised the IISG as a tool for EU action in the Western Balkans. It is our opinion that this finding can lead to sustainable ‘proof of concept’ (hereby addressing the finding related to the uncertainty of its sustainability).

Finally, we would like to express our gratitude for the opportunity to benefit from the findings of the Evaluation Report, which will point us into the right direction.

EXECUTIVE SUMMARY

Background

In the context of the changing criminal landscape in the Western Balkans, and the negotiations for accession to the European Union (EU) of the different jurisdictions, the region has been identified as deficient in combatting serious organised crime. While the nature of modern crime calls for a more coordinated and efficient approach to tackle it, there are gaps in regional cooperation mechanisms and identified instances of duplications in technical assistance, as well as a lack of a common direction and regional coordination.

Against this backdrop, the Western Balkan Counter-Terrorism initiative (WBCTi) was initiated in 2015 to present a joint, coordinated approach to regional cooperation in the Western Balkans (WB). This initiative, supported by more than 50 relevant actors as well as by the European Commission, is aimed at integrating international assistance on counter-terrorism. Subsequently, it was extended from WBCTi to two other areas of internal security – the WB Counter-Serious Crime Initiative (WBCSCi) and the WB Border Security Initiative (WBBSi) under the aegis of the Integrative Internal Security Governance (IISG) mechanism. The concept of IISG was formally endorsed by the Council of the EU in late 2016 and by the Ministers of Interior/Security of the Western Balkans region at the Brdo Process Ministerial Meeting in September 2017. The Multi-Country – Support to the Western Balkan Integrative Internal Security Governance initiative (hereinafter ‘the Action’), funded under the Instrument for Pre-Accession Assistance (IPA 2017), focuses on some of the major gaps in areas posing the gravest challenges to the region. It is envisioned as a tool to further deepen cooperation on key foreign policy issues and strengthen EU governance of that cooperation.

Purpose, scope and methodology

This formative evaluation was undertaken at an early stage in the implementation process as a best practice initiative in formulating a baseline for future evaluations and to mainstream evaluation processes in the initiative. It covers WBCSCi/ IISG pillar II, in relation to the overall IISG, including its activities, outputs and outcomes, as well as its strategy and structure. It also covers the EU Action in so far as it pertains to Pillar II for the time period from May 2016 to October 2018. To derive robust findings and conclusions on Design, Relevance, Effectiveness, Efficiency, Impacts and Sustainability, Partnerships and Cooperation, and Human Rights and Gender Equality (HRGE) aspects of the WBCSCi and the Action, the evaluation utilised a mixed-methods, inclusive and participatory approach.

Limitations to the evaluation

As the WBCSCi and the Action, and IISG itself, are in their infancy this evaluation can only provide indicative evidence at this stage. Further, the scope and complexity of operations embedded in three different layers (IISG, WBCSCi, EU Action) posed some unique challenges to the evaluation exercise, which the evaluation team has addressed by spreading data collection efforts as widely as possible.

Main findings

Design: The evaluation found that the IISG is best considered an early-stage entrepreneurial venture that has identified ‘the right customer needs’, but is yet to develop, establish and institutionalise formal systems and processes. While the strategies and policies of the WBCSCi, as well as the Action, are largely aligned with the issues identified in the gap analysis on regional cooperation in fight against serious and organized crime, there is a need for better prioritisation of the priorities themselves, while taking into consideration and ensuring coherence with other initiatives in the region, in particular EU Actions in the Western Balkans. Various stakeholder groups were extensively involved in the design of the WBCSCi, and the Rapid Reaction Plan (RRP) developed by the IISG is a best practice that incorporates risk management, exchange of real-time operational intelligence and conduct of joint operations involving various law enforcement agencies. There is insufficient integration within the results-based frameworks of the IISG and the different components of the Action. Lastly, HRGE considerations are acknowledged to be important in general but their actual use in designing interventions has been somewhat limited.

Relevance: The relevance of the WBCSCi and the Action, and the IISG mechanism at large, to the EU and stakeholders in the Western Balkans, particularly jurisdictional governments and their EU Accession processes, is visible in the desk review as well as through stakeholder consultations. The strategic documents underpinning the WBCSCi and Action corroborate the importance of the Western Balkan region in key aspects covered by the IISG mechanism including counter-terrorism, serious organised crime and border control. There is a close link between the strategies and priorities of the beneficiary jurisdictions and the regional, security, EU Accession focus of the IISG and WBCSCi. At the operational level, and specifically in relation to ‘tackling Western Balkans internal security threats’, WBCSCi initiatives are focused on improving the capacity of national institutions to address security threats. However, the focus of the IISG mechanism in building institutionalised collaboration has been a somewhat weaker link.

Effectiveness: The activities and initiatives being evaluated are at an early stage of implementation, and hence their actual contribution to EU Accession processes remains limited. That said, there is wide support for the concept of the IISG as a potentially effective tool for regional coordination/ collaboration, but lesser support for the current level of and approach to the implementation of the mechanism. However, IISG’s work is promoting informal collaboration and trust-building among beneficiaries across the region. There is also wide support for the content and approach of the ongoing initiatives of the Action, including work with police, prosecutors, ECTs, JITs, financial crime investigators, but it is too early to provide definitive evidence on their effectiveness.

Efficiency: The financial data indicate that the IISG Support Group is operating on a small budget but appears to be contributing to increased informal coordination and collaboration, leading to reduced duplication and increased efficiency of resource use for countering SOC in the Western Balkans. While it is too early to measure the degree of efficiency, systematically-collected anecdotal examples highlight improvements in coordination and reductions in duplication of efforts (e.g., training), as per the wishes of both donors and stakeholders. Stakeholder interviews provided some prominent examples such as avoidance of plans to establish a new network for Financial Intelligence Units in the Western Balkans after IISG pointed out an existing network to a prospective donor. Various stakeholders also suggested that informal consultations among donors and technical assistance providers has led to increased awareness of ongoing projects, which in turn led to reduced duplication of efforts. However, the evaluation did note some ongoing duplication such as two training events on financial investigations, targeting essentially the same audience, at the same time and location. While conceding that some duplication was still ongoing, stakeholders suggested that reducing, not eliminating, duplication would be a more realistic goal.

Partnerships and cooperation: The high-level political agreement among IISG Board members and beneficiary governments highlights the contribution of IISG to building partnerships and cooperation. However, IISG has not systematized the processes through which it identifies appropriate partners to deliver on its objectives. There was general agreement among interviewed stakeholders that the partnership and cooperation facilitated by the IISG has also worked well regarding the EU Action and its pre-accession objectives with respect to Western Balkan jurisdictions. Many of the partners engaged with the IISG noted the access the IISG had provided to regional partners as well as the appropriate EU institutions and expertise to drive forward progress in this area. However, feedback was less positive when it came to donor partnership, notably EU Heads of Delegations in Western Balkans states. Civil society organisations in the region also point to a lack of concrete engagement with the IISG.

Impact and sustainability: Given that the WBCSCi has been running for approximately one year there is insufficient data from which any definitive findings can be drawn regarding the long-term impact on improving overall security in the region (and Europe), nor a real sense of the sustainability of either the IISG itself or the initiatives of the IISG or the EU Action. However, there are some prominent examples that indicate a build-up toward potential future impacts, including an approach by EU Member States to regional partners for initiating joint investigation teams (JITs) and the ongoing development of the prosecutors' network. Not only was there a direct impact from this, i.e. arrests of individuals, but an unexpected impact in-so-far as the Western Balkan partners to the Action felt 'included' and part of the bigger picture. Lastly, the evaluation notes that the EU Accession process provides opportunity and leverage to focus beneficiary activity in Pillar II areas towards achieving a reduction in serious organised crime in the region and Europe. In the same vein, EU Accession assistance measures, and indeed Accession itself, are both frameworks for the financial and policy sustainability of the mechanism.

Main conclusions

The evaluation concludes that IISG leadership identified and targeted the right need for increased coordination of technical assistance in the Western Balkans. The leadership team played a visionary role in helping bring together key stakeholders and laid the foundation for a more effective and efficient institutional response to serious organised crime. Working with a small operating budget, the IISG has been able to provide an important 'proof of concept' for the new 'venture'. Managing its growth and delivering on results, however, especially in view of upcoming potential leadership changes, will require more systematic management.

While the concept of the IISG, as a tool for EU action in Western Balkans, is widely recognised as a potentially effective tool for regional coordination, stakeholders have conflicting opinions on its current effectiveness level. While beneficiaries are generally satisfied with the concept of and support received from the IISG, other stakeholders are waiting to see results, particularly at the operational level. While the IISG is using Results-based Management (RBM) for planning purposes, it is not well-integrated into other IISG planning documents nor is there a systematic collection of data for monitoring and evaluation. A better-defined results framework that is better integrated with the results-based planning of the Action can facilitate the processes by which the EU, the IISG Support Group and beneficiaries achieve and demonstrate results through the IISG mechanism.

Although it is too early to measure impact in the context of both the IISG WBCSCi and the EU Action, the indicators within the logical framework lack the potential to measure short, medium or long-term results. This is of importance when it comes to measuring the potential impact of training in tackling serious and organised crime as many of the activities focus on capacity building through training.

The IISG has been successful at developing partnerships and cooperation with many key actors in the region including beneficiaries and law enforcement agencies. However, other partnerships such as with the EU, CSOs and SELEC could be enhanced/ developed. Lastly, while DCAF has been instrumental in providing early foundations and enabling the success of IISG, it is worth re-examining whether it continues to be the right location for the IISG. This question should include consideration of its status as an independent body.

Main recommendations

The IISG Support Group is encouraged to establish more systematic management systems and processes. It also needs to clarify and manage stakeholder expectations on results as it takes time to build infrastructure and processes for effective coordination. The Support Group, in consultation with WB jurisdictions, should also make a greater effort at prioritisation of priorities, even if that means not all stakeholder groups will be completely satisfied with the strategic choices made. Similarly, the Support Group should review its current partners and identify where existing partnerships could be strengthened and new partnerships formed, including with CSOs in the region. It should also develop and implement a methodology for regularly mapping all country and regional activities relevant across all three pillars to minimise the risk of duplication of key activities in the WB region. In collaboration with leaders of the implementing groups of the EU Action, it is encouraged to engage technical assistance within a results-based design and management framework to strengthen the correlation of results logic within IISG frameworks.

The IISG Board is encouraged to re-examine the organisational set-up, as well as objectives and mechanisms of the IISG, including structural independence and autonomy from DCAF, for the IISG Support Group. The IISG Support Group, in close consultation with all relevant parties, including the WB jurisdictions, EU, and Lead Partners, should provide a detailed proposal for the consideration of the board.

European Union representatives and the IISG Support Group need to develop and agree on clear guidelines and expectations on results and reporting along with pre-defined timelines.

Lessons learned and best practices

The gap analysis performed by the IISG leadership to understand “customer needs” for increased coordination of technical assistance in the Western Balkans region represents a best practice that other organisations, projects and programmes should consider emulating. As a result of this environment scan and deep understanding, the IISG has succeeded in understanding and addressing their ‘market’. The IISG has also been very successful at earning the trust of beneficiaries and buy-in at the political level, which again represents a best practice. A formative evaluation in early stages of establishing organization and mechanisms indicates an interest in culture of evaluation and organization learning, which is worth imitating and sustaining over the long run. In terms of lessons learned, the need for greater institutionalisation of management systems and processes for sustainability is readily apparent. The IISG itself would do better to focus on this aspect in its next phase.

SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS

Findings	Evidence (sources that substantiate findings)	Recommendations (Implementer)
1. IISG leadership identified and targeted the right ‘customer need’ for increased coordination of technical assistance in the Western Balkans. While the leadership team has laid the foundations for a more effective and efficient response, these need to be more formally institutionalised.	Interviews, field missions, and desk review.	1) IISG should establish more systematic management systems and processes to move from a start up to a more mature institution. (Action: IISG Support Group)
2. The concept of the IISG is widely recognised as a potentially effective tool for regional coordination, however stakeholders have conflicting opinions on its current effectiveness level. While many stakeholders are satisfied with the concept of the IISG, others are impatient to see results.	Interviews, focus group discussions, field missions, and desk review.	2) IISG needs to clarify and manage stakeholder expectations on results as it takes time to build infrastructure and processes for effective coordination. (Action: IISG Support Group)
3. While DCAF has been instrumental in providing early foundations and enabling the success of the IISG, it is worth re-examining whether it continues to be the right location for the IISG Support Group. This question should include consideration of its status as an independent body as	Interviews, field missions, and focus group discussions.	3) IISG is encouraged to re-examine the organisational and geographical location as well as objectives and mechanisms of the IISG, including structural independence, for the IISG Support Group. The IISG Support Group, in consultation with all relevant parties, should develop and provide detailed proposals for the consideration of the IISG Board. (Action: IISG Support Group; IISG Board).

well as its geographic location.		
4. The evaluation finds that while the IISG has been very effective at involving beneficiaries, it is assuming more responsibilities than its resources can effectively allow.	Interviews, focus group discussions, surveys, field missions, and desk review.	4) IISG, in close consultation with the WB jurisdictions, should make a greater effort at prioritisation of priorities. Further, it should develop and implement a methodology for regularly mapping all country and regional activities relevant across all three pillars to facilitate planning and minimise the risk of duplication of key activities in the WB region. (Action: IISG Support Group; IISG Board).
5. The IISG has been successful at developing partnerships and cooperation with many key actors in the region including beneficiaries and law enforcement agencies. It has also been successful at generating critical buy-in at the political level in the region. There is, however, no systemic procedures for identifying potential partners; other partnerships such as with the EU, SELEC and CSOs could be enhanced/ developed.	Interviews, focus group discussions, surveys, field missions, and desk review.	5) IISG should develop and implement a mechanism for reviewing the effectiveness of its current partnerships, including with the EUDs and CSOs. This mechanism should further identify potential new partnerships and examine how inter-pillar partnership can be improved. (Action: IISG Support Group; IISG Board).
6. While the IISG is using Results-Based Management (RBM) for planning purposes, it is not systematically collecting data for monitoring and evaluation. A better integration of results frameworks would significantly improve the ability of implementing partners, the IISG Support Group, Member States, beneficiaries and the EU to discuss the value and effectiveness of the IISG	Interviews, focus group discussions, field missions, and desk review.	6) The IISG Support Group and leaders of the implementing groups of the EU Action are encouraged to engage technical assistance within a results-based design and management framework to strengthen the correlation of results logic within IISG frameworks (logframe and iPA) and between these frameworks and those of the EU Action and the logframes of implementing groups of the Action. The intent of this initiative would be to develop an overarching Theory of Change for the WBCSCi component of the

and the WBCSCi. A better-defined results framework can facilitate the processes by which the EU, the IISG Support Group and Member States achieve better results through the IISG mechanism.		IISG, incorporating all aspects of the EU Action, and through this Theory of Change have a single integrative tool for the work of all of these actors. (Action: IISG Support Group; EU Action implementing partners, IISG Board).
7. Sustainability of the IISG mechanism depends on the degree of ownership demonstrated by the beneficiary jurisdictions, working via the mechanism of IISG Board.	Interviews, focus group discussions, field missions, and desk review.	7) IISG needs to enhance the role, involvement and ownership of IISG mechanism for the beneficiary jurisdictions, working via the mechanism of IISG Board. (Action: IISG Support Group; IISG Board).
8. Although too early to measure impact in the context of both the IISG WBCSCi and the EU Action, the indicators within the logical framework lack the potential to measure short, medium or long-term results.	Interviews, focus group discussions, field missions, and desk review.	8) IISG should make a greater effort at systematically-collecting data for monitoring and evaluation. The indicators for measuring the future impact of the IISG and the EU Action also need to be reworked in line with their respective strategic frameworks. (Action: IISG Support Group).
9. HRGE considerations are acknowledged to be important in general, but their actual use in designing and implementing interventions so far have been somewhat limited.	Interviews, focus group discussions, field missions, and desk review.	9) IISG needs to make more explicit use of human rights and gender equality considerations in working with implementing partners on designing and implementing interventions. This would help ensure that the intended focus on HRGE is an actual focus of implementation. (Action: IISG Support Group)
10. The evaluation finds the need for improvements in IISG's management of its relationship with its major donors, especially with regard to reporting and results expectations.	Interviews, focus group discussions, field missions, and desk review.	10) European Union and IISG representatives need to develop and agree on clear guidelines and expectations on results and reporting expectations along with pre-defined timelines. (Action: European Union, IISG Support Group).
11. The planning, coordination and implementation within the EU Action needs to be aligned better.	Interviews, focus group discussions, field missions, and desk review.	11) The EU needs a clear and common theory of change with all implementers of EU Action on board for planning and coordination. They should all have clear and pre-determined contributions to impact and outcome targets (Action: European Union).

I. INTRODUCTION

Background and context

The criminal landscape in Europe is undergoing a rapid change. Organised Crime Groups (OCGs) are increasingly flexible, becoming more inter-connected and cooperative at the international level but also financially and politically stronger, engaging in multiple forms of crime. Further, cheaper means of transport and ways of communication, including the internet, enable criminal groups to be more mobile and tightly interlinked. In this context, the European Union's (EU) Global Strategy (2016) identified the challenges of migration, energy security, terrorism and SOC as critical issues confronting the Western Balkans. A UNODC report,⁵ similarly, revealed money laundered from drugs-related operations through the Western Balkans exceeds European averages, which is making the challenge of tackling SOC in the region of paramount importance.

The region, however, has been identified as deficient in combatting SOC, especially in its financial dimension. While the nature of modern SOC calls for a more coordinated and efficient approach at the EU level, a 2014⁶ report highlighted gaps in regional cooperation as well as recommendations for better integrating existing regional mechanisms. It also identified instances of duplication in implementing activities on the part of external actors, including the EU, resulting from, among others, numerous sets of priorities related to fighting SOC, terrorism and irregular migration. Many of these priorities were either not followed through or even remained unknown to most international security actors and donors. A lack of a common direction and regional coordination was also noticeable.

Against this backdrop, the Western Balkan Counter-Terrorism initiative (WBCTi) was initiated in 2015 to present a joint, coordinated approach to regional cooperation in the Western Balkans. It aimed at integrating international assistance on counter-terrorism. It is supported by more than 50 relevant actors as well as by the European Commission.

The concept of Integrative Internal Security Governance (IISG) in the Western Balkans was formally endorsed by the Council of the EU in late 2016. It was later supported by the ministers of the Western Balkan (WB) region at the EU–WB Justice and Home Affairs (JHA) Forum. The integrative and complementary approach was extended from WBCTi to two other areas of internal security – the Western Balkans Counter Serious Crime Initiative (WBCSCi) and the Western Balkan Border Security Initiative (WBBSi). The immediate goal of the IISG is to integrate EU and international assistance in the three prominent areas of internal security, to reduce duplications of action among the existing and planned efforts of various actors, and to

⁵Drug Money: The Illicit Proceeds of Opiates Trafficked on the Balkan Route (UNODC, 2015).

https://www.unodc.org/documents/data-and-analysis/Studies/IFF_report_2015_final_web.pdf.

⁶ 2014 Report on Gap Analysis on Regional Cooperation in the Area of Migration Management and Fight against Serious and Organised Crime. <http://www.rcc.int/docs/366/report-on-gap-analysis-on-regional-cooperation-in-the-area-of-migration-management-and-fight-against-serious-and-organised-crime>.

maximise the efficiency of achieving jointly agreed priorities. This is expected to lead to reduction in serious organized crime.

On 8 September 2017, the IISG Board – ministers of the Western Balkan Governments – officially established the IISG Support Group and divided the tasks among the Lead Partners of the respective Pillars: (1) Slovenia, Austria and the Democratic Control of Armed Forces (DCAF) Ljubljana for the WBCTi, (2) PCC SEE Secretariat, together with the UNODC for the WBCSCi, and (3) Austria and DCAF Ljubljana for WBBSi.

The current structure of IISG and its pillars is depicted in Figure 1 below.



Figure 1. IISG: An Overview

The EU Action

To address these issues is also one of the top priorities of the EU, which launched six flagship initiatives, including on the rule of law and security and migration in its new 2018 strategy for the Western Balkans.⁷ This EU prioritisation is also demonstrated by the signature of the Joint Action Plan on Counter-Terrorism for the Western Balkans, signed in Tirana in October 2018 by the EU and all six Western Balkans Partners.⁸ The EU Action,⁹ under the Instrument for

⁷ https://ec.europa.eu/commission/news/strategy-western-balkans-2018-feb-06_en

⁸ https://ec.europa.eu/home-affairs/sites/homeaffairs/files/news/docs/20181005_joint-action-plan-counter-terrorism-western-balkans.pdf

⁹ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf

Pre-Accession Assistance, focuses on some of the major gaps in areas posing the gravest challenges to the region, including countering money laundering, forgery of travel documents and financing of terrorism as a result of SOC activities. In line with the objectives of the EU Enlargement Strategy 2014, the Action is envisaged as a tool to further deepen cooperation on key foreign policy issues and strengthen EU governance of that cooperation.

The Action, based on the concept of Integrative Internal Security Governance (IISG), seeks to integrate existing instruments and the future and planned efforts of all relevant actors. The Action, at the same time, consists of several ‘strands of action’, implemented by different entities (hereinafter: EU Action implementing Partners). Its overall objective is to “improve the overall security in the Western Balkans and the EU by combatting organised crime and terrorism.” Its specific objective is to “counter serious crime and terrorism based on intelligence led policing, financial investigations through an effective and functioning Integrative Internal Security Governance in the Western Balkans.” The action foresees activities in the following six areas: training; mentorship; information sharing and mutual trust; support in the formation of joint investigation teams; support to liaison officers at Eurojust and at Europol; and capacity building for strengthening the beneficiaries’ efforts in fighting migrant smuggling.

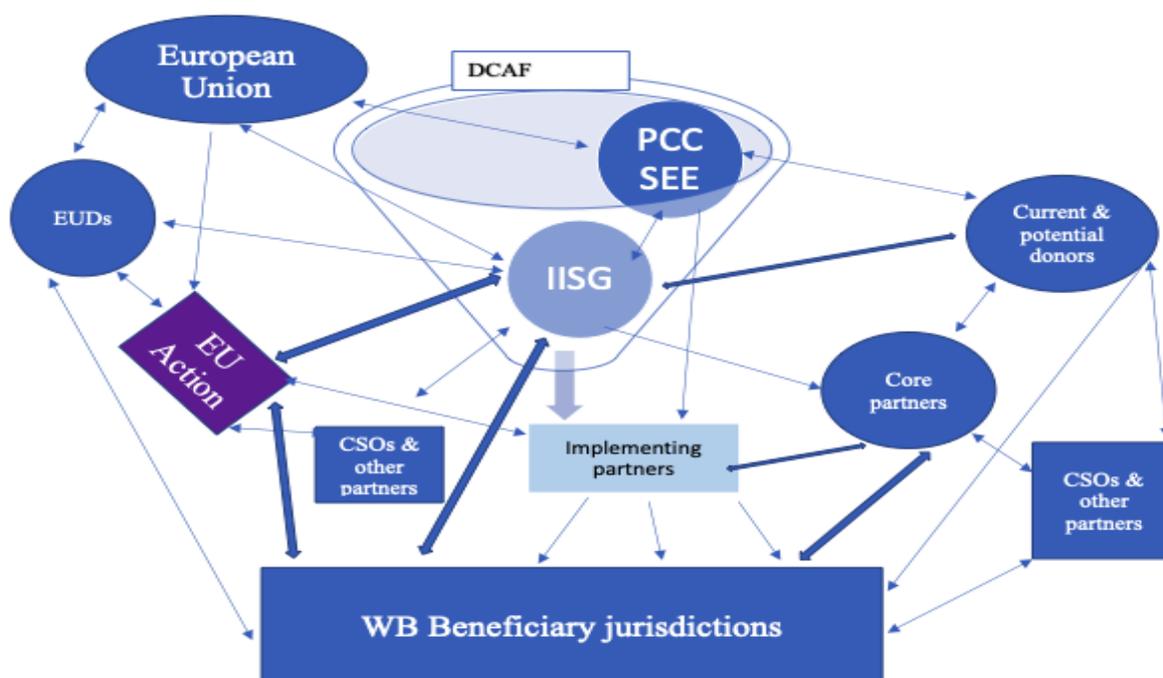


Figure 2. Regional Cooperation System in Western Balkans: A Simplified Version

Figure 2 above provides a simplified overview of the regional cooperation system in the Western Balkans. While each of the entities included above is a complex system in itself (e.g. European Union or a WB jurisdictional government), even the simplified version above is fairly complex in itself. As shown in Figure 1, IISG, the smallest entity with a staff of three, itself is evolving into a complex system. As these complex systems interact with each other at sub-entity, departments, projects and individual level, the scope of work that needs to be coordinated, and hence duplications to be avoided, is significant. The EU Action and IISG’s WBCSCi mechanisms are two key mechanisms that have been created to undertake this task. While the EU Action is the primary resource-provider for IISG, the latter is an independent entity, currently located within DCAF (alongside the PCC SEE Secretariat).

Purpose and scope of the evaluation

This formative evaluation was undertaken at a very early stage in the implementation process to evaluate the complex system outlined above. Per the Terms of Reference (ToR, [Annex I](#)), the purpose of the evaluation was to conduct a formative evaluation of the EU Action and the WBCSCi under the current funding agreement of the EU Action, covering ‘IPA II (2017) Support to the WB IISG – the “Action” - at the programmatic level as well as the WBCSCi of the IISG at the more strategic level’. The evaluation had a particular focus on utility, i.e. ensuring the formulation of conclusions and recommendations in particular are of use to the IISG Support Group and implementers of the EU Action in improving the design and implementation of their initiatives. The evaluation was also to provide a baseline on which future evaluations of the WBCSCi can be structured. This evaluation was carried out at the request of the IISG Board, who will be presented with its findings and recommendations at its meeting in early 2019.

It covers WBCSCi/ IISG pillar II, in relation to the overall IISG, including its activities, outputs and outcomes, as well as its strategy and structure. It also covers the EU Action under IPA II (2017) in so far as it pertains to pillar II, for the time period from May 2016 to October 2018.

In addition to Design, Relevance, Effectiveness, Sustainability, Cooperation and Partnerships, and Lessons Learned, the criteria specified in the evaluation ToR, the evaluation team included efficiency and impact criteria for the evaluation during the inception phase.

Efficiency was considered important as WBCSCi seeks to reduce duplication of efforts, and impact was included so as to not lose sight of the *raison d’être* for creating this mechanism. Lastly, Human Rights and Gender Equality (HRGE) are considered cross-cutting criteria.

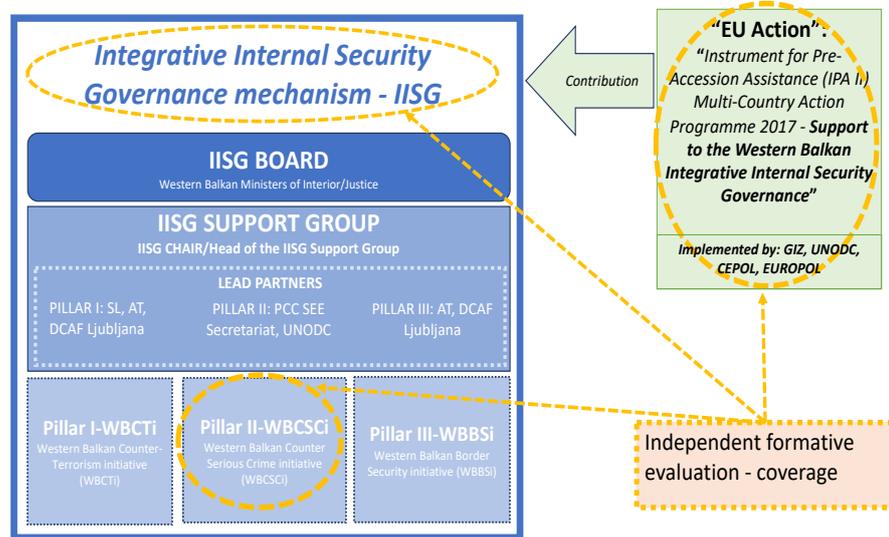


Figure 3. Scope of the current evaluation

Figure 3 provides an overview of evaluation. Please note that the main focus of the evaluation was on Pillar II, but the evaluation also considered the overall IISG mechanism and EU Action, as necessary and desirable.

The composition of the evaluation team

This evaluation was conducted by a team consisting of Punit Arora (team leader), Jim Newkirk (RBM expert), Peter Allan (organised crime expert), Eleni Tsingou (anti-money laundering expert), and Katherine Aston and Emanuel Lohninger under the supervision of Katharina Kayser (all IEU).

Punit Arora is Chief Strategist at Associate for International Management Services. Dr. Arora is a leading strategic management expert with experience in results-based planning, management and evaluation in over 60 countries. He has led several strategic evaluations for the UN system organisation, including UNODC. He has also drafted strategic papers on the use of big data, National Evaluation Capacity Development, and capacity development at UNODC. He was a member of the prestigious Indian Civil Service. For his work with the Indian government, he was invited to be a member of its Global Network of Government Innovators. Dr. Arora also teaches strategic management and mentors new technology startups at the City University of New York.

Jim Newkirk, a Belgrade-based professional evaluator, has 40 years of experience in development cooperation in the Balkans, Central Asia, the Caucasus, the Middle East, Africa, South America and Asia, including over 14 years of experience in project/ programme evaluations and outcome/ impact assessments for the EU, UN Agencies and Sida among others. His thematic experience includes public sector administration reform, with a strong focus on EU Accession processes in the Western Balkans, private sector development, sustainable development, human rights-based approaches, gender equality, peace and security, social development. Mr. Newkirk also has results-based project management experience at a senior level, including design, implementation, and training.

Peter Allan is the CEO of Allan Consultancy Ltd. which has for the last decade specialised in intelligence analysis training and project and programme evaluations within the criminal justice sector, many of which have involved the UN system in general and UNODC in particular. He has over twenty years of experience as a Senior Intelligence Analyst for the UK Intelligence Services and laterally for the EU Agency for Law Enforcement Cooperation (Europol). His operational work included source development within the serious and organised crime sphere as well as assisting in the creation of the National Intelligence Model (NIM) in the UK and the EU Serious and Organised Crime Threat Assessment (SOCTA), including in the Western Balkans region.

Eleni Tsingou is an Associate Professor in the Department of Organisation of the Copenhagen Business School. She has fifteen years of experience in research on anti-money laundering, focusing both on regulatory and policing affairs, and private sector practices. She has also undertaken work on EU governance, including on the EU's role as a regional and global actor. She has published extensively on anti-money laundering, banking regulation and on EU governance issues. Dr. Tsingou has been a team member of strategic evaluation teams for UNODC.

Evaluation methodology

To derive robust findings and conclusions, the evaluation utilised a mixture of primary and secondary sources of data. The primary data sources included, among others, interviews with key stakeholders (face-to-face or by telephone), surveys, field missions and observations, and focus group discussions. Secondary data sources included all the documents and archival data available from the Evaluation Management Group (EMG), complemented by those available from implementing agencies and their partner organisations. Overall, the evaluation followed

a mixed-methods, inclusive and participatory approach and methodology with adequate triangulation and counterfactuals to arrive at credible, reliable and unbiased findings. The evaluation also sought to integrate the human rights and gender dimensions. The evaluation methodology, consisting of five concurrent processes, is further elaborated below.

First, during the inception phase, a review and analysis of relevant documents supplied by the EMG was undertaken, including concept notes, progress reports, revisions, and publications (Annex IV). The evaluation team also conducted initial interviews with the EMG to finalise the scope of the evaluation, which was outlined in the Inception Report. This report also refined evaluation questions, methodology and tools.

The second process involved field missions to all six jurisdictions in the Western Balkans, often in combination with observations of workshops, meetings and other events organised under the initiative. Overall, the evaluation team attended ten such events and collected feedback through interviews, focus group discussions and surveys as feasible ([Annex VI](#)). The evaluation team recorded observations in areas such as chairing/facilitation, keeping to task/objectives, clarity of purpose, decision-making, and participant inclusion. The team used semi-structured interview protocols to elicit specific information from meeting participants ([Annex II](#)). The team also conducted separate interviews with beneficiary stakeholders in the WB countries, covering the key areas of law enforcement and prosecution in particular. Finally, the team conducted interviews with local representatives of civil society organisations where appropriate.

Field missions were conducted to:

- Albania;
- Austria;
- Belgium;
- Bosnia and Herzegovina;
- Croatia;
- Former Yugoslav Republic of Macedonia;
- Hungary;
- Kosovo*;
- Montenegro;
- Serbia;
- Slovenia.

The third process involved interviewing key stakeholders at the IISG, EU DG NEAR, GIZ, PCC SEE, UNODC, CEPOL, and Europol in person, over the phone or via Skype, using semi-structured protocols listed in Annex II. Overall 63 in-depth interviews (38% female) were conducted. These interviews sought to capture the voices of key representatives of all stakeholder groups, identified on the basis of stakeholder analysis conducted in consultation with the EMG.

The fourth process involved collection and analysis of additional data available from partner organisations. This included data from qualitative and quantitative information collected by these partners from beneficiary jurisdictions and officials.

The fifth process involved feedback surveys of trainees and meeting participants to gauge the usefulness of coordination and the capacity building component — a central output of the WBCSCI/IISG pillar II/ EU Action. The evaluation team administered these feedback surveys

at each of the events they attended. As depicted in Figure 4, 133 respondents (28% female), associated in a wide variety of roles and activities of WBCSCi, completed the feedback forms.

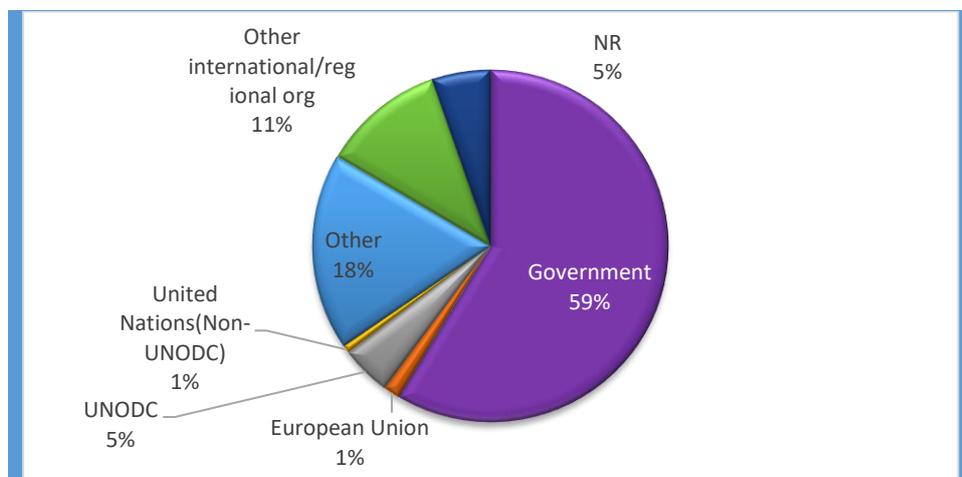


Figure 4.
Stakeholders surveyed for the evaluation (N=133)

Limitations to the evaluation

1. WBCSCi/IISG pillar II and the EU Action are in their infancy in terms of implementation and this evaluation is formative in nature. Hence, it was not anticipated that there would be significant feedback in terms of actual outcomes and (especially) impacts. Interviews with a wide range of potential partners and beneficiaries, survey and systematically-collected anecdotal evidence was used to develop as comprehensive a picture of the interventions as possible.
2. The evaluation covered a wide variety and numbers of actors. As a result of the multiplicity of actors involved in the process, very few stakeholders were found to possess a comprehensive understanding of coordination mechanisms. The scope and complexity of operations embedded in three different layers (IISG, WBCSCi, EU action) posed some unique challenges to the evaluation exercise, which the evaluation team tried to overcome by spreading data collection efforts as widely as possible.
3. As IISG did not segregate expenditure data for each of the individual pillars, the evaluation can only consider efficiency at the level of the IISG. While given the (small) size of IISG's budget it is not a significant issue at the moment, the evaluation notes the need to undertake such a practice going forward.

II. EVALUATION FINDINGS

Design

Evaluation questions:

- To what extent are the strategies and policies of WBCSCi/ IISG pillar II, in the context of the larger IISG, aligned with the issues identified in the *gap analysis*? Are the priorities in the plan of action addressed in the design? To what extent were different stakeholders involved in the design of the IISG/ WBCSCi?
- To what extent are the results-based management mechanisms in place to identify and measure progress in achieving outcomes and impacts? Are risks being specifically identified and addressed?
- To what extent are gender equality and human rights considerations integrated in the design and implementation of the WBCSCi/IISG pillar II?

The Design questions essentially evaluate the extent to which the logical framework approach was adopted and used. While the desk review suggested that the strategies of WBCSCi and the EU Action, as well as the IISG mechanism in general, are aligned with the issues identified in the gap analysis, stakeholder consultations revealed a more nuanced picture. The triangulated findings from multiple sources suggest that the IISG is best considered an early-stage entrepreneurial venture — the so-called start-up — that has identified ‘the right customer needs’ and is growing very fast. However, like any early stage venture that grows fast, it is yet to develop, establish and institutionalise formal systems and processes to manage this growth.

While the WBCSCi is comprehensive in the overview of the Serious and Organised Crime (SOC) landscape, stakeholder consultations suggested that it was perhaps too comprehensive and that there is a need to prioritise the priorities. The WBCSCi Integrative Plan of Action 2018-2020¹⁰ mentions fifteen different priorities, as well as a delineated list of 11 ‘needs’ not directly linked to the priorities. While these priorities were compiled on the basis of extensive stakeholder consultations and needs assessment, stakeholders suggested that more extensive prioritisation efforts could have been undertaken to prune the list, including reconsidering, rebranding and simplifying the existing fifteen priorities.

While acknowledging the efforts of the IISG Support Group at undertaking extensive consultations, stakeholders expressed their lack of clarity on how these inputs were considered in the planning and implementing the activities of IISG. The evaluation also found that the linkage between planned activities and expected outcomes, as well as the

¹⁰ wb-iisg.com/wp-content/uploads/bp-attachments/5038/WBCSCi-iPA-2018-2020-final-draft-17-Apr-18-final.pdf

demarcation of responsibilities between the IISG and partner organisations, was unclear to stakeholders.

Results-based management mechanisms

The evaluation found limitations in the results-based management mechanisms of the IISG/WBCSCi/EU Action, particularly in relation to the integration of the logical frameworks of the different components of the Action (per the different implementing partners and their specific activities and anticipated results) with each other and the IISG's results framework visible in the Integrated Plan of Action of the WBCSCi. It can be seen that as a whole the intervention is missing a single Theory of Change that clearly demonstrates the specific activities, anticipated results and objectives expressed in a clear and correlated manner across actors. The following discussion provides further details – the table below provides the relevant components of each of the existing, related results frameworks.

There is a clear linkage at the level of overall objective, with the exception of the CEPOL objective. This correlation immediately falls away at the level of specific objectives. The iPA has no stated outcomes and both the content and formulation of the Specific Objective statements are at different levels. For example, the EU Action and UNODC statements are much more general than the CEPOL and GIZ statements which contain detail and specifics. In the context of *integrated approaches*, all would benefit from agreement on how Specific Objectives are to be formulated and some agreement on specifics of language related to programme priorities. This issue becomes more significant at the Results level, where a more clearly expressed correlation would be expected, and would contribute at the higher level of Specific Objectives as well as in correlating across the different logical frameworks. Given the importance of the EU Action to the IISG overall a clear relationship at the impact and specific objective level would be expected. Further, as implementing partner activities are funded directly from the EU Action and are expected to deliver the anticipated Results of the Action, a direct correlation would also be expected, but is not visible.

Implementing partners *have* undertaken, in coordination with the IISG Support Group, to integrate their results frameworks with the IISG's results framework as visible in the WBCSCi's Integrative Plan of Action 2018-2020. Defined actions and expected outputs from the work plans of the implementing partners are detailed against the 'need addressed' – based on the list of 11 needs as agreed at the Jable Strategic Preparation Meeting in November of 2017 and detailed in the iPA¹¹. Unfortunately, the prioritised needs, related actions and intended results are not integrated in a significant manner with the IISG's own result framework as visible in the iPA. While there has been mention of an approach to correlate the work of implementing partners, using the financing of the Action with the IISG, this is not visible in logical/ results frameworks.

¹¹ wb-iisg.com/wp-content/uploads/bp-attachments/5038/WBCSCi-iPA-2018-2020-final-draft-17-Apr-18-final.pdf

WBCSci iPA	EU Action	GIZ Component	UNODC Component	CEPOL Component
To improve the overall security in the Western Balkans and Europe by addressing the challenges of occurring forms of Serious Crime	To improve the overall security in the Western Balkans and the EU by combatting organised crime and terrorism.	To improve the overall security in the Western Balkans and the EU by combatting organised crime and terrorism	To improve the overall security in the Western Balkans and the EU by combatting organized crime and terrorism	To develop and sustain institutional capacity of the law enforcement agencies of the beneficiary countries in order to prevent, investigate and prosecute transnational organised crime and financing terrorism.
None delineated.	To counter serious crime and terrorism, based on intelligence-led policing, financial investigations through an effective and functioning Integrative Internal Security Governance in the Western Balkans.	Raise the effectiveness of and cooperation among regional and national capacities in tackling occurring forms of SOC, including the recovery of illegal financial gains obtained through diverse types of cross-border crime and the fight against illegal migrant smuggling.	<ol style="list-style-type: none"> 1. Organized crime and terrorism threats are degraded. 2. Regional threats of transnational organized crime and terrorism are reduced. 	<ol style="list-style-type: none"> 1. Developing competencies of respective law enforcement personnel including judicial officials in the WB region so as to be able to deal with transnational organized crime in the context of effective financial investigation and particular attention of Rule of Law and Fundamental Rights taking into account the European perspective of the countries. 2. Creating sustainable professional networks building upon practical exchange of professional experience of FI Units, AML Unit and Counter-Organised Crime Departments across the region and with the EU Member States, being able to contribute to the carrying out of actions under the EU policy cycle against SOC.

WBCSCi iPA	EU Action	GIZ Component	UNODC Component	CEPOL Component
Results	Results	Results	Results	Results
<p>1. Sustainable capacities developed for efficient tackling occurring forms of Serious Crime in the Western Balkans, incl. enhanced capacities for cooperation between police and prosecution.</p> <p>2. Increased rate of investigated Serious Crime and Corruption cases in the Western Balkans.</p> <p>3. Closer alignment with EU and other international mechanisms for cooperation.</p> <p>4. Sustainable use of necessary equipment, based on relevant needs assessments.</p> <p>5. Improved governance of regional and international cooperation relevant for Countering Serious Crime and Corruption in the Western Balkans and EU.</p>	<p>1. Beneficiaries are better equipped in tackling organised crime, major and serious criminal phenomena and terrorism including violent extremism.</p> <p>2. Improved co-operation and collaboration between WB law enforcement and judiciary and with other bodies (notably those of the EU Member States and the EU Agencies).</p> <p>3. One overarching Western Balkan Security Governance with integrative plan of actions created and endorsed based on the needs identified by the Beneficiaries and the main donors, indicating the priority, the potential implementing body (and its partners) and the financing.</p> <p>4. Trust between the Beneficiaries, donors and implementers is increased on cross- border and international cases.</p> <p>5. Capacity and confidence among the Beneficiaries in fighting organised crime,</p>	<p>1. Strengthened operational capacities and capabilities of respective law enforcement units to conduct cross-border investigations and prosecutions on SOC, especially to undertake financial investigations and to fight illegal migrant smuggling.</p> <p>2. Improved effectiveness of respective law enforcement units on investigations and prosecutions through more efficient cooperation with relevant European and regional authorities and the use of regional instruments, particularly EUROPOL, Interpol, PCC SEE and Eurojust.</p> <p>3. Increased efforts to improve legislation and regulations for cross border police and judicial cooperation.</p> <p>4. Improved skills and knowledge of beneficiaries on specific topics arising on short-notice from practical cooperation and joint investigations.</p>	<p>1. Jurisdictions have increased capacities to conduct financial investigations. (SO1)</p> <p>2. Jurisdictions have increased capacities to cooperate at the interagency and international level in money laundering, terrorist financing investigations, and asset recovery cases. (SO2)</p> <p>3. Evaluation results used for improved accountability and learning. (SO2)</p>	<p>1. Comprehensive overview about the recent challenges, gaps and training needs on financial investigation in the WB.</p> <p>2. Having a full picture about ongoing and planned donor activities.</p> <p>3. Drafting an accurately fine-tuned action plan.</p> <p>4. Reinforced personal competencies on financial investigation including knowledge on relevant legal instruments, good practices and lessons learned.</p> <p>5. Better understanding of benefits of interagency and international cooperation, especially in regional and EU regard.</p>

	<p>terrorism and alike is improved.</p> <p>6. Europol Liaison Officers fully operational in the selected WB beneficiaries.</p>	<p>5. Enhanced prerequisites for concluding or implementing Cooperation Agreements between beneficiaries and Eurojust.</p> <p>6. Enhanced framework of information and data exchange between respective police units and relevant European and regional authorities.</p> <p>7. Improved effectiveness and strengthened operational capacities and capabilities of respective police units on pre-investigations through more efficient cooperation with relevant European and regional authorities and the use of regional instruments, particularly Europol, Interpol and PCC SEE.</p> <p>8. Improved skills and knowledge of respective police units on special investigation techniques, asset recovery and investigations on fugitives.</p>		
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Associated issues related to the EU Action document

The Action document (Multi-Country Support to the Western Balkan Integrative Internal Security Governance¹²) is funded from the Instrument for Pre-Accession Assistance (IPA II) 2014-2020. The Action is funded through a EUR 20,000,000 contribution from the EU. While the expected results of the Action generally correlate with the described activities of the Action and the work of implementing partners, the defined Result 3 of the Action document does not fit within the Action – this intended result is the subject of a separate funding arrangement (not part of this evaluation). While it is closely linked to the Action and the work of implementing partners, there is no funding for, nor activities directly related to, the IISG mechanism in the Action (with the exception of a designated sub-grant from the GIZ component to DCAF Ljubljana for the IISG). The Objectively Verifiable Indicators also include references to the IISG establishment but are not a part of the Action.

Analysing the activities and results of the EU Action, and the IISG, would be significantly improved if terminology between documents was aligned. The Action document uses some terminology that is not visible in the logframes of the implementing partners, including the Action document's emphasis on mentorship, information sharing and mutual trust. While the logical frameworks do not use this terminology, activities in these areas are visible. Capacity building activities are ongoing, particularly with CEPOL and UNODC. Initiatives in relation to the ECTs are ongoing and it is within these that mentorship is a focus, if not emphasised in the implementing partner's activity planning documents. No work has started yet with the Liaison Officers, which are an activity of Europol and the work on Joint Investigative Teams (JITs) is noted only by Serbia in work to date on the Action.

Implementing partners of the Action (GIZ, the Italian Ministry of the Interior, the Centre for International Legal Cooperation, CEPOL, UNODC and Europol) have developed their own logical frameworks for the work they are doing that is funded through the Action. These logical frameworks generally correlate with the Action's logical framework at the Overall Objective level, and the actual activities of implementing partners are clearly visible in and linked to the Action's expected results. There is no specific referencing of the Action's Results statements, nor are they visible in work plans or integrated in ways that contribute to measurement and analysis at the level of the Action.

Lastly, while the WBCSCi includes some mechanisms to link activities to outcomes, there are no explicit links to impacts. There are some monitoring mechanisms in place to identify and measure progress, but these do not appear to extend across the WBCSCi.

Risk analysis

Strategy and policy documents, as well as the implementation design documents, incorporate analysis of potential risks linked to economic, political and social dimensions. One good example of this is the Rapid Reaction Plan (RRP) 2018-2019 developed by the

¹² European Commission Action ID IPA 2017/039-402.09/MC/Security Governance.

IISG. The RRP, supported partially/in some of its segments by additional funding from GIZ, envisages exchange of real-time operational intelligence and conduct of joint operations involving the law enforcement agencies, including border police, of the IISG Beneficiaries. While there are issues pertaining to the sustainability of this initiative, as funding currently has been earmarked only for a year and it has been created as a temporary response without long-term vision, stakeholders believe, and evaluation concurs, this to be a correct approach to coordination and risk management.

Human Rights and Gender Equality

In evaluating the role of human rights and gender equality (HRGE) in design, the evaluation considered both questions of intent and actual practice in the activities of implementing partners and beneficiaries. In the desk review, the evaluation found evidence of concern for HRGE issues in the documents guiding the WBCSCi and the EU Action. Specifically, the WBCSCi includes an indicator related to gender issues in the logical framework. The Action identifies gender mainstreaming, equal opportunities, and attention to minorities and vulnerable groups as some of the relevant cross-cutting issues. It also refers not just to questions of gender balance and participation, but also to how different facets of criminal activity are gendered. Further, it suggests addressing the needs of specific vulnerable groups should the situation warrant it. HRGE considerations as described above are also reflected in implementation documentation, with particular focus on human trafficking and exploitation. However, privacy issues as they relate to data protection are not explicitly included in the design or implementation.

In reviewing the activities of stakeholders, the evaluation found, in general, a low level of engagement with HRGE issues. For most interviewees and survey participants, HRGE considerations are deemed important but do not necessarily warrant an explicit focus in this instance. There is general awareness that SOC has HRGE implications, and an understanding that HRGE issues are part of Chapters 23 and 24 of the EU Acquis; however, in addressing SOC, no distinct analysis or discussion are deemed necessary. For those involved in financial investigations, the HRGE aspects are regarded as even less relevant.

When prompted, *beneficiaries* identified three types of relevant issues:

- The importance of including HRGE in training in more comprehensive ways. Questions that may be considered by some as marginal are better accepted when promoted and presented as relevant to all;
- The humanitarian side of the management of asylum-seeking issues;
- The importance of disaggregating criminal data and understanding the role of women in smuggling networks.

In the above cases, beneficiaries referred to intent or frameworks rather than any specific activities linked to the WBCSCi and the EU Action.

At the *implementation* level, interviewees referred to the comprehensive HRGE structures inherent in their respective organisations but provided no particular evidence of HRGE specifics in work linked to the WBCSCi and the EU Action, or the IISG framework as a whole.

The limited number of stakeholders who would like to see a greater focus on HRGE expressed doubts that such concerns can be fully implemented in policy so long as judiciary integrity and independence remain works in progress. In this respect, the role of civil society organisations was identified as potentially important. Interviewees also noted that EU-funded projects in the Western Balkans with a national focus and scope sometimes make use of civil society organisations for the mainstreaming of gender issues, for example; the evaluation did not find this to be the case in the activities it covers. In quantitative terms, there were differing opinions on whether gender balance is achieved in project activities - but some also expressed doubts as to whether an explicit quantitative focus is of service to female professionals.

Touching upon a specific aspect of HR, stakeholders note that the activities coordinated by the IISG could provide technical assistance in the area of personal data protection. Tools to assist the protection of personal data during information sharing activities are already available and the IISG could further help ensure that they are adequately used. In general, the data protection legal framework in Western Balkan jurisdictions is considered good (it is a requirement for accession talks and visa liberalisation) but stakeholders suggested that this does not mean that mechanisms for safeguarding data protection are actually in place and actively used.

The evaluation also found that engagement with civil society organisations has not yet taken place in the design or implementation of the IISG mechanism or WBCSCi. The focus of the initiatives has so far been on institutions of governance and of law enforcement, but the opportunity for engagement with civil society organisations (as opposed to mere meeting participation) – an engagement which has the potential to improve communication with citizens and which also adds an oversight dimension – has not yet been explored.

Summary - Design

While the strategies and policies of WBCSCi, as well as the EU Action, are largely aligned with the issues identified in the *gap analysis*, there is a need for better prioritisation of priorities themselves. Although various stakeholder groups have been extensively involved in the design of the WBCSCi, the process by which these inputs are melded together in a cohesive and streamlined results framework could be improved. The results frameworks of the IISG and the EU Action are not well-correlated, and in this context do not provide an overall framework (Theory of Change) for the work of the IISG/ EU Action. Lastly, HRGE considerations are acknowledged to be important in general but not of special relevance to SOC; their actual use in designing interventions so far has been somewhat limited.

Relevance

Evaluation questions:

- To what extent are the WBCSCi/IISG pillar II and the related EU action aligned with the policies and strategies of beneficiaries, including those related to human rights and gender equality? To what extent is the IISG integrated into national level mechanisms?
- To what extent is the WBCSCi/IISG pillar II and the related EU action, relevant to tackle the Western Balkans internal security threats, in particular relating to policy coordination?

Relevance refers to the extent to which the objectives of a project are continuously consistent with recipients' needs. The relevance of the WBCSCi and Action, and the IISG mechanism at large, is supported by the desk review as well as stakeholder consultations. The strategic documents underpinning the WBCSCi and Action corroborate the importance of the Western Balkan region in key aspects covered by the IISG mechanism including counter-terrorism, serious organised crime and border control. This relevance is visible at least from early 2015 when the European Commission's Ministerial Council's conclusions on an integrative and complementary approach to counter terrorism and violent extremism in the Western Balkans¹³ led to the establishment of the Western Balkan Counter-Terrorism Initiative (WBCTi). This initiative was then developed into the concept of integrated internal security governance in the Western Balkans, which was formally introduced at the EU level with the adoption of the 'Council Conclusions on strengthening the EU internal security's external dimension in the Western Balkans including via the Integrative Internal Security Governance (IISG).'¹⁴

The IISG as integrative mechanism can be specifically relevant to the plans and priorities of the European Commission in and for the Western Balkans. This is particularly visible in the document 'A credible enlargement perspective for an enhanced EU engagement with the Western Balkans'.¹⁵ The document emphasises the potential for fulfilment of the EU's *own political, security and economic interests* from accession of the countries of the Western Balkans. The document emphasises the rule of law and makes specific reference to addressing organised crime, corruption and money laundering. Linked to this policy framework are the EU's Six Flagship Initiatives for the Western Balkans, one of which is the Initiative to reinforce Engagement on Security and Migration, with its focus on 'Reinforced cooperation on fighting organised crime, countering terrorism and violent extremism and on border security and migration management.'¹⁶ This initiative makes specific references to Europol liaison officers and joint investigation teams, both of which are specific components of the Action being evaluated.

¹³ December 2015. Justice and Home Affairs Ministerial Council conclusions.

¹⁴ December 2016. Council of the European Union. General Secretariat of the Council. Outcome of Proceedings.

¹⁵ June 2018. Communication from the Commission to the European Parliament, the Council, the European Economic Committee and the Committee of the Regions. Strasbourg.

¹⁶ May 2018. EU-Western Balkans Six Flagship Initiatives.

Another example of IISG relevance for the plans and priorities of the EU in and for the Western Balkans is the Joint Action Plan on Counter-Terrorism for the Western Balkans¹⁷, signed in October 2018. While focused primarily on counter-terrorism, the Joint Action Plan covers linkages with the fight against organised crime, namely in the area of research, information exchange as well as the fight against money laundering and terrorist financing. It underlines the role of the IISG in follow-up.

While there is visible support for the policy focus and links to strategy, the relevance of the IISG mechanism is not so well understood or supported by stakeholders - the evaluation heard conflicting perspectives and a range of concerns about the relevance of the IISG. While there is widespread support for harmonisation of legislation and processes across the different jurisdictions, a specific question was raised related to the focus on EU Accession, as opposed to 'strengthening of law enforcement, regardless of the Accession framework', and the view that the suppression of crime should be the real priority for the IISG, not the focus on Accession. A related perspective questions the established 'high level' at which IISG discussions currently take place against the view that initiatives should focus more at the operational, rather than the political, level.

The objectives and outcomes of the WBCSCi are aligned with the stated policies and strategies of beneficiaries. In September 2017, the ministers of the interior/security of the Brdo Process convened in the framework of the inaugural meeting of the IISG Board. The "Brdo Process Ministerial Meeting - IISG Board Kick-Off Conference" took place in Brdo pri Kranju, Slovenia, on 8th September 2017. The Ministerial Conclusions¹⁸ of the Kick-Off Conference included a reiteration of Ministerial support for regional cooperation in the area of internal security and support for the implementation of the IISG concept and its further development. The Police Cooperation Convention for Southeast Europe (PCC SEE) Secretariat was appointed by the Ministers as the lead partner of the WBCSCi. The PCC SEE Secretariat prepared the first multi-annual Integrative Plan of Action (iPA), the final draft of which was submitted to the IISG Board at its March 2018 meeting. This second IISG Board Meeting also 'reiterated strong support and commitment to the implementation of the Integrative Internal Security Governance' as well as endorsing UNODC and the Secretariat of the Police Cooperation Convention for South Eastern Europe as Lead Partners for WBCSCi/ Pillar II.¹⁹

There is a close link between the IISG and WBCSCi, and the EU Accession plans of beneficiaries. While this is visible in a number of areas, beneficiary countries note their responsibilities in relation to alignment with the EU Acquis and the processes in which they are engaged to harmonise their legislation and policy frameworks with the Acquis, the key component of the Accession process. While IISG/WBCSCi address a number of Accession priorities, the critical Accession framework are two chapters of the Acquis: Chapters 23 Judiciary and fundamental rights and Chapter 24 Justice, freedom and security. The IISG/WBCSCi are directly relevant to the highlighted areas of 'border control, visas, external migration, asylum, police cooperation, the fight against organised

¹⁷ https://ec.europa.eu/home-affairs/sites/homeaffairs/files/news/docs/20181005_joint-action-plan-counter-terrorism-western-balkans.pdf

¹⁸ Ministerial Conclusions, Brdo Process Ministerial Meeting - IISG Board Kick-Off Conference, 8 September 2017, Brdo pri Kranju, Slovenia.

¹⁹ 2nd Integrative Internal Security Governance Board Meeting, March 2018 Brdo pri Kranju, Slovenia.

crime and against terrorism, cooperation in the field of drugs, customs cooperation and judicial cooperation in criminal and civil matters.’ In this same framework, the EU provides assistance through its Instruments for Pre-Accession Assistance (which have funded the IISG and the WBCSCi).

The initiatives funded under the WBCSCi, through the Action, are focused specifically in their planning on being relevant to programme participants, including at the operational level. This has been done through assessment and planning processes such as the training needs assessments undertaken by UNODC, GIZ and CEPOL in initiating the funded training components of the Action, as well as the design and implementation of the Embedded Country Teams and work with Joint Investigative Teams – each of these specific initiatives are conceived and implemented within a framework of relevance to beneficiary jurisdictions and operational effectiveness. Yet at the operational level too, the need for more relevance was identified, for example, in the operational focus of the WBCSCi’s financial investigations training (CEPOL and UNODC). This training addresses the links to the illicit flow of funds within and through the Western Balkans and the current levels of knowledge/skills within the region’s law enforcement offices in relation to financial investigations. While there are clear links in this to Chapter 24, this is not seen by practitioners as relevant – for many of them the relevance is in improvements in law enforcement and for others in faster information sharing and collaboration at the institutional level.

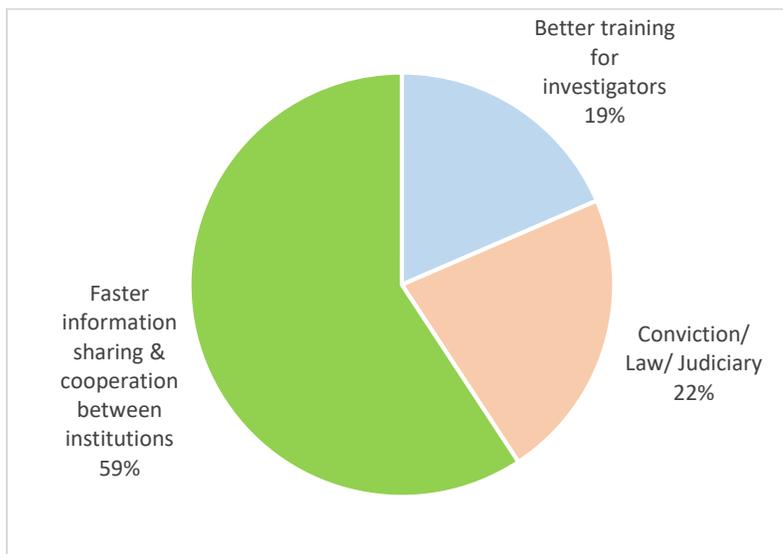


Figure 5. What does your jurisdiction need to do to counter serious and organised crime?

This was also indicated in the feedback surveys. Several beneficiaries suggested that they were receiving too much training, while they needed more active institutional arrangements for collaboration. In Figure 5, 59% of the respondents

suggested a need for

faster information sharing and cooperation between the institutions as the major need for their jurisdictions in countering SOC.

Finally, as in the case of design, HRGE considerations are acknowledged to be important, but were not seriously considered to be relevant for this particular set of issues by a number of stakeholders. The perception of SOC as gender-blind is prevalent. Additionally, human rights issues are deemed to be sufficiently covered by existing legal frameworks.

Summary - Relevance

There is a close link between the strategies and priorities of the beneficiary jurisdictions and the regional, security, EU Accession focus of the IISG and WBCSCi. At the operational level, and specifically in relation to ‘tackling Western Balkans internal security threats’, WBCSCi initiatives are focused on improving the capacity of national institutions to address security threats. However, the focus of the IISG mechanism in building institutionalised collaboration has been a somewhat weaker link.

Effectiveness

Evaluation question:

- To what extent does WBCSCi/IISG pillar II and the EU action contribute to the accession of Beneficiaries to the European Union, in particular relating to chapters 23 and 24 of the Acquis? What were the contributing factors for achievement or non-achievement?

Effectiveness is a measure of the degree to which an intervention has or is likely to attain its stated outcomes. It is important to note in terms of effectiveness that the activities/initiatives being evaluated are at an early stage of implementation and that actual contributions to EU Accession processes remain limited. While Chapter 23 (the judiciary and fundamental rights) is of some relevance to work in Pillar II (the Prosecutors Network in particular), it is in the full range of priority areas of Chapter 24 that the real importance is found. Chapter 24’s focus on security, and particularly border control, migration, police cooperation, the fight against organised crime, cooperation in the field of drugs, customs cooperation and judicial cooperation is of particular importance to the design, activities and results of the WBCSCi.

Coordination and collaboration in project activities

The intent of the IISG is to focus on coordinating project activities in the field, and specifically on addressing coordination of events and initiatives where such coordination has not been a factor in implementation of initiatives. This approach is about discussions at the strategic level with beneficiaries, EU, donors, and implementing partners for linking needs and strategies with subsequent inputs in the design of related initiatives. The approach of the IISG was observed to include three components: synergies, consultations and prioritisation.

- Synergies – the focus here is on collaboration and coordination, both within Pillar II and across the three Pillars. One example is the IISG migration action, which with EU encouragement is now aligning IISG partner actions on irregular migrations *across all three IISG Pillars*. Other examples include alignment of the work of other European agencies (and others) in addressing SOC, including specifically Europol, CEPOL, SEPCA and the UK Foreign Commonwealth Office (FCO) whose plans for establishment of a network of Financial Intelligence Units in the WB were being considered without knowledge of the existing IISG set-up.

- Consultations – the focus here is on maintaining a close communication and connection with DG HOME, DG NEAR, EUDs in the region and national stakeholders (mostly through the Regional Cooperation Council (RCC) and RCC Board - <https://www.rcc.int/home> and the IISG Board).
- Prioritisation – the focus here is on both EU priorities and the priorities of national stakeholders, although there are a number of similarities given the context of serious organised crime. One example is the IISG-developed P-R-A (Prevent-Refer-Address) Model, focused on policy gaps in Western Balkan reform and capacity building initiatives.

However, feedback from field investigations is less uniform in its reading of the intent and effectiveness of the IISG mechanism. There is wide agreement on the need for quality in cooperation and effectiveness in collaboration, and acknowledgement that the IISG setting offers opportunity for engagement with and among all Western Balkan beneficiaries. It is not clear, however, that quality in cooperation and effectiveness in collaboration are as yet being achieved with the IISG, nor that the IISG is effectively contributing to coordinated efforts against serious organised crime. One clear and specific area of concern is that to date EUDs, and the EU's Special Representative (EUSR) in BiH, are not being engaged to any significant or relevant degree in the IISG and the EU Action. It is noted that there are skilled and knowledgeable specialist resources (relevant to the IISG/WBCSCi) within these EU structures that can and should be contributing to substantive aspects of the Action and to processes of planning and coordination. Again, the potential of the IISG approach is widely acknowledged but actual effectiveness of results is not generally regarded as *yet* visible. This feedback to the evaluation was extensive and needs to be taken on board in this context; that there is a generally accepted acknowledgement of the value of the concept but less widely accepted acknowledgement of the actual implementation of the IISG mechanism, with stakeholders pointing to needed improvements in coordination and communication between agencies implementing the EU Action and EUDs/ EUSR.

Similarly, the IISG mechanism has not fully engaged with SELEC, which includes the Republic of Albania, Bosnia and Herzegovina, Montenegro, the Former Yugoslav Republic of Macedonia, and the Republic of Serbia as its members, and seeks “to provide support for Member States and enhance coordination in preventing and combating crime, including serious and organised crime”.

Contribution of the EU Action to the IISG

The EU Action seeks to “deliver an integrative and coordinated approach to countering SOC in/emanating from the Western Balkan region – based on the Integrative Internal Security Governance (IISG) concept, which builds on the methodology of the EU Western Balkan Counter-Terrorism initiative. The integrated multi-annual action plan will integrate the efforts of EU and international partners.”²⁰ As is discussed in the Design and Relevance sections, funded activities of the Action have worked to address the implementation of the Action in an integrated way, within the context of the iPA. As is also indicated above, there remain areas in the integration processes, including in the details of the iPA and its implementation, where further work is needed before it can be said that the Action is delivering an integrative and coordinated approach.

²⁰ European Commission Action ID IPA 2017/039-402.09/MC/Security Governance.

Funded activities of the EU Action

The current activities being implemented within the EU Action include focused training activities in financial investigations, in each beneficiary country, intended to improve the ability of law enforcement to pursue the financial transactions of organised crime groups, regional cooperation in relation to illicit financial flows, support to and strengthening of national Prosecution offices, strengthening of cross-border cooperation in a range of law enforcement areas, a focus on mentorship and ‘Embedded Country Teams’, a focus on information sharing and development of mutual trust, formation of Joint Investigation Teams and establishment of a group of Liaison Officers.

The Action totals EUR 21,625,000, of which the EU is providing EUR 20,000,000 from IPA funds. The funding is directed as follows.

The German Gesellschaft for Internationaler Zusammenarbeit (GIZ) component.

EUR 13,000,000 of EU IPA financing and an additional amount of EUR 1,500,000 financed by the German government. This allocation is for the work of GIZ and its implementing partners the Italian Ministry of the Interior, the Center for International Legal Cooperation (CILC).

The GIZ component includes the following Outputs as defined in the GIZ logframe.

Strengthened operational capacities and capabilities of respective law enforcement units to conduct cross-border investigations and prosecutions on SOC, especially to undertake financial investigations and to fight illegal migrant smuggling.

Improved effectiveness of respective law enforcement units on investigations and prosecutions through more efficient cooperation with relevant European and regional authorities and the use of regional instruments, particularly EUROPOL, Interpol, PCC SEE and Eurojust.

Increased efforts to improve legislation and regulations for cross-border police and judicial cooperation.

Improved skills and knowledge of beneficiaries on specific topics arising on short-notice from practical cooperation and joint investigations.

Enhanced prerequisites for concluding or implementing Cooperation Agreements between beneficiaries and Eurojust.

Enhanced framework of information and data exchange between respective police units and relevant European and regional authorities.

Improved effectiveness and strengthened operational capacities and capabilities of respective police units on pre-investigations through more efficient cooperation with relevant European and regional authorities and the use of regional instruments, particularly Europol, Interpol and PCC SEE.

Improved skills and knowledge of respective police units on special investigation techniques, asset recovery and investigations on fugitives.

The UNODC component

EUR 2,500,000. EU IPA financing comprises 95% of this amount.

The UNODC training component includes the following anticipated Outputs.

Training strategy and road map is designed for each jurisdiction.

Capacities of Financial Intelligence Unit (FIUs) analysts, police, and other Law Enforcement Officers (LEAs), prosecutors and judges to conduct Financial Investigations (FIs) are increased through training.

The regional platform for the regular exchange of the strategic and operational information on illicit financial flows is established.

The CEPOL component

EUR 2,500,000, 100% EU IPA financing. The CEPOL component includes the following Outputs.

Comprehensive overview about the recent challenges, gaps and training needs on financial investigation in the Western Balkans.

Having a full picture about ongoing and planned donor activities.

Drafting an accurately fine-tuned action plan.

Reinforced personal competencies on financial investigation including knowledge on relevant legal instruments, good practices and lessons learned.

Better understanding of benefits of interagency and international cooperation, especially in regional and EU regard.

The Europol component

EUR 2,000,000, 100% EU IPA financing. The Europol component includes the following Outputs.

Deployment of Europol Liaison Officers in the Western Balkans.

Implementation status of EU Action

Expected results	Status
1. Beneficiaries are better equipped in tackling organised crime, major and serious	Capacity building programmes have been prepared based on need assessments, designed and are being implemented.

criminal phenomena and terrorism including violent extremism.	
2. Improved cooperation and collaboration between WB law enforcement and judiciary and with other bodies (notably those of the EU Member States and the EU Agencies).	Capacity building programme implementation includes participation of both law enforcement and the judiciary (and others). It is too early to assess status, but comments from participants indicate cooperation and collaboration will develop.
3. One overarching Western Balkan Security Governance with integrative plan of actions created and endorsed based on the needs identified by the beneficiaries and the main donors, indicating the priority, the potential implementing body (and its partners) and the financing.	Not a specific component of the funded activities under the Action. The IISG is established, and iPAs created. Further work is needed in the actual integration aspect of the iPAs.
4. Trust between the beneficiaries, donors and implementers is increased on cross-border and international cases.	Results are not visible at this stage although a range of activities have been initiated that address this result area.
5. Capacity and confidence among the beneficiaries in fighting organised crime, terrorism and alike is improved.	Capacity building programmes in place. It is too early to address results in this area.
6. Europol Liaison Officers fully operational in the selected WB beneficiaries	There are no results in this area as yet.

The evaluation notes the focus from implementing partners on ‘staging’ the training, i.e., on working to ensure that each training event builds on previous work and that participation in an advanced event is predicated on a participant’s successful completion of precursor events. The evaluation observed a number of capacity building events (UNODC, GIZ and CEPOL, as well as one OSCE event considered part of Pillar II but not funded by the Action). From these events the evaluation received positive feedback from participants on a number of aspects of the training.

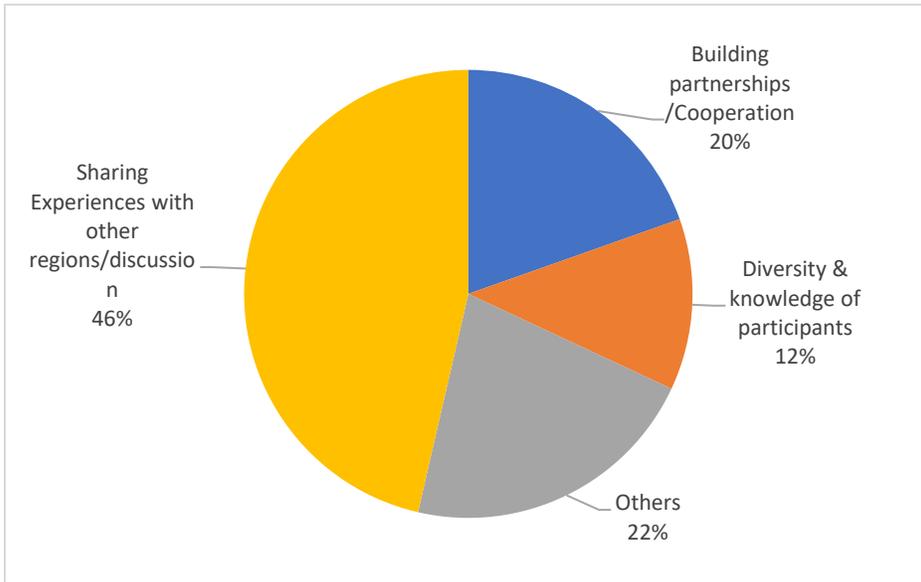


Figure 6 - Best aspects of provided training.

Training participants were asked about the *best aspects* of the training programme. Answers, enumerated below, have a strong emphasis on sharing and on partnership building (Figure 6).

While participants were generally satisfied, they had some suggestions on how to make similar meetings and training events more useful in future (Figure 7). Their suggestions generally pertained to increased opportunities for collaboration around practical cases.

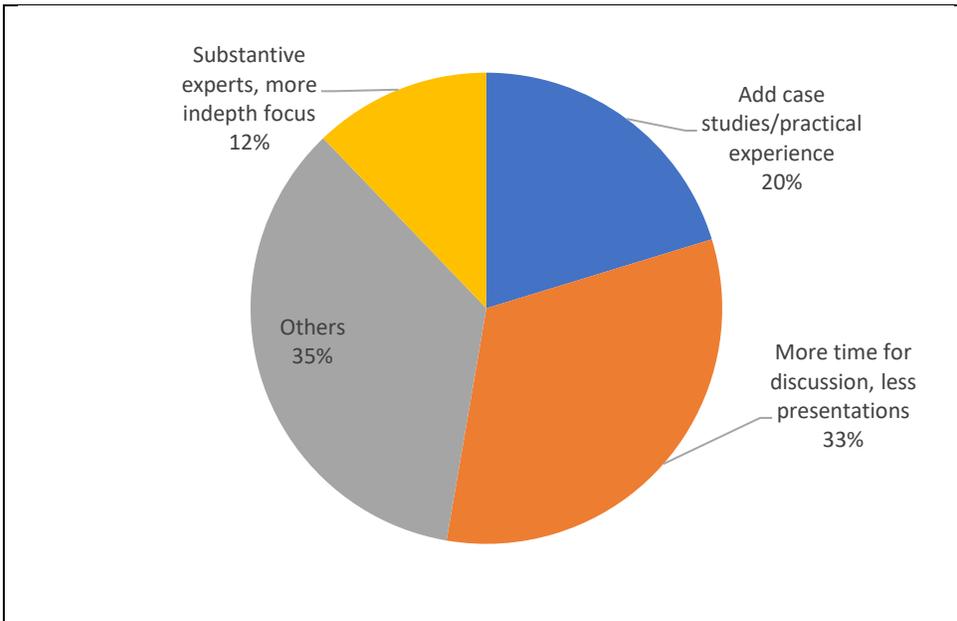
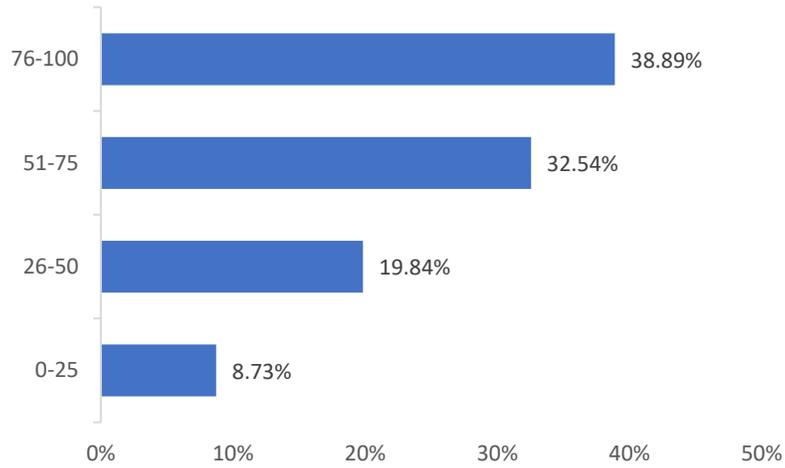


Figure 7 - Changes suggested for similar meetings in the future.



More importantly, most of these participants received training on issues they were already engaged in (Figure 8),

Figure 8 - Percentage of Regular Work directly related to covered topics.

which increased their intention and likelihood of using it for their own professional development as well as to help other colleagues and peers across the region (Figure 9).

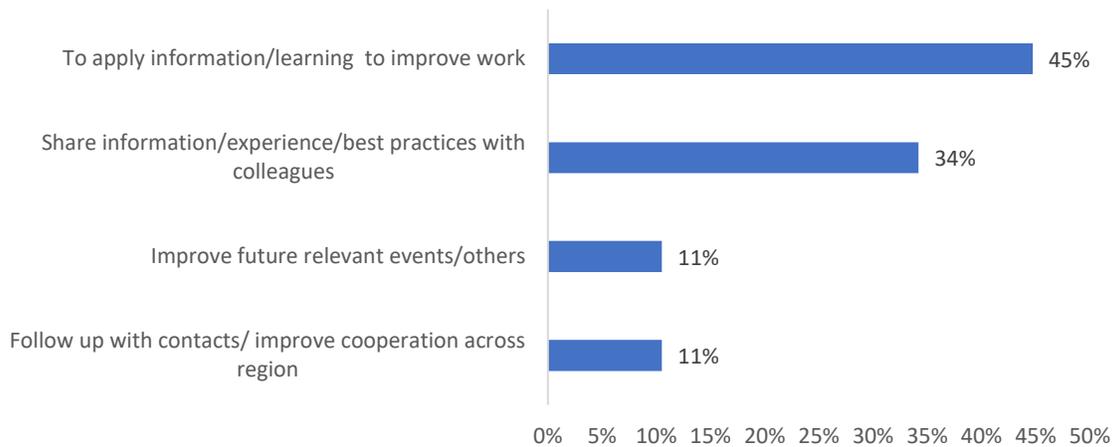


Figure 9 - How participants plan to use the information and networks gained at this meeting.

Overall, most of the progress made by the IISG mechanism so far pertains to Outcome 1 on capacity development. There is preliminary evidence for enhanced regional cooperation and collaboration, closer engagement with the needs of beneficiaries, and reduced duplication in the activities. However, it is too early to make a judgement with respect to other outcomes. Similarly, there is insufficient evidence on the effectiveness with regard to human rights and gender equality priorities at all levels of the Action and the IISG. While a focus on human rights and gender equality is seen in the policy frameworks of the EU and the implementing agencies, this focus has not transferred down

to the actual design and implementation priorities of implementing partners. On the gender results effectiveness scale (GRES),²¹ the Action and IISG can best be described as either ‘gender targeted’ or ‘gender blind’.

As is indicated in the Design section, there is also insufficient engagement with civil society in design and implementation of the Action’s initiatives. Civil society organisations are not visible in the Action nor the IISG, and their potential contribution to sharing the intent and priorities of the initiatives with citizens, and for passing on citizen feedback to stakeholders is missing. As well as contributions to the IISG and to implementing partners in the Action, civil society feedback on and contributions to the work with beneficiary agencies, and the relationship between law enforcement and the community is also missing, both in design and in implementation.

Lastly, an issue with significant implications for the IISG’s effectiveness that frequently came up in discussions with stakeholders pertains to the question of its organisational and geographic location. While several stakeholders acknowledged that DCAF performed an important function in laying the foundations for the IISG as well as in enabling its early success and offering continuous administrative support, they noted that DCAF may no longer be the right location for the IISG. These stakeholders noted that not only is that DCAF not a representative of EU, but also it adds to the complexity of layers requiring coordination. While DCAF provides administrative convenience for IISG, it is also limiting from the perspective of beneficiary jurisdictions, which would like to interact with an independent IISG that reflects EU and IISG’s priorities more clearly. Even those who are not certain on this issue suggest that this question is worth examining. Some beneficiaries also proposed moving to the WB region as an option, others disagreed given the lack of consensus on location that could best serve the needs of the IISG. As it is beyond the remit of this evaluation to conduct an in-depth analysis on this issue, the evaluation notes the general consensus for re-examination of the administrative and geographic location and tables it for the consideration of the IISG Board and Support Group.

Summary - Effectiveness

There is wide support for the concept of the IISG as a potentially effective tool and mechanism for regional coordination and collaboration, but less support for the current level of and approach to the implementation of the mechanism. There is also wide support for the content and approach of the ongoing initiatives of the EU Action, including work with prosecutors, ECTs, JITs and the financial investigation training, but it is too early to provide definitive evidence on their effectiveness.

Efficiency

Evaluation questions:

²¹ See UNDP. Independent Evaluation Office. Evaluation of UNDP Contribution to Gender Equality and Women’s Empowerment (page 46).

- To what extent is the IISG pillar II/WBCSCi and the EU action, efficient in pursuing stated objectives and outcomes? Are there any significant opportunities to improve efficiency and reduce risks?

Efficiency, the most basic economic measure of success, concerns the 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 outcomes, as well alternative (i.e., counterfactual) scenarios, to determine the efficiency with which resources and inputs were converted into outputs. Further, analysis of projects' documents was triangulated against opinions of stakeholders consulted.

Before discussing efficiency, it is important to mention the total budget and expenditure relating to the IISG mechanism. Please note that IISG did not have these data for each of the individual pillars, so the evaluation can only consider efficiency at the level of the IISG.

As exhibited in Figure 10, total contributions to the operational costs of the IISG mechanism over the period of Apr 2016-Sep 2017 were €658,295. 86% of this came from the IPA II 2016 Multi-Country Action contribution. DCAF (8%), GIZ/ IPAlI 2017 Multi-Country Action (5%) and PCC SEE Secretariat (1%) provided the remainder of the funding.

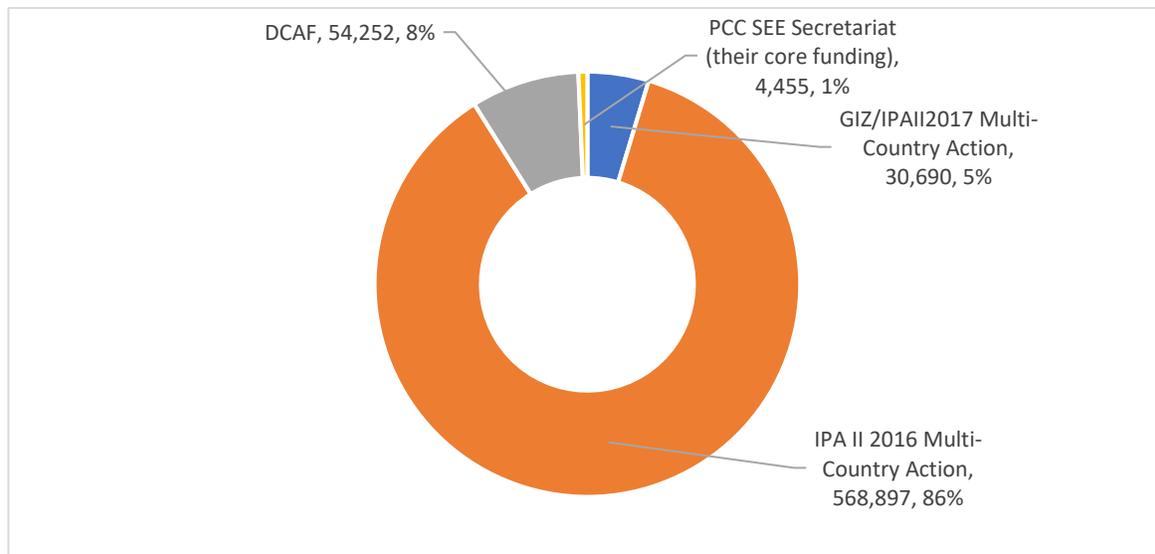


Figure 10 – Total contributions (Euros, %) to the IISG mechanism for the period of Apr 2017- Sep 2018.

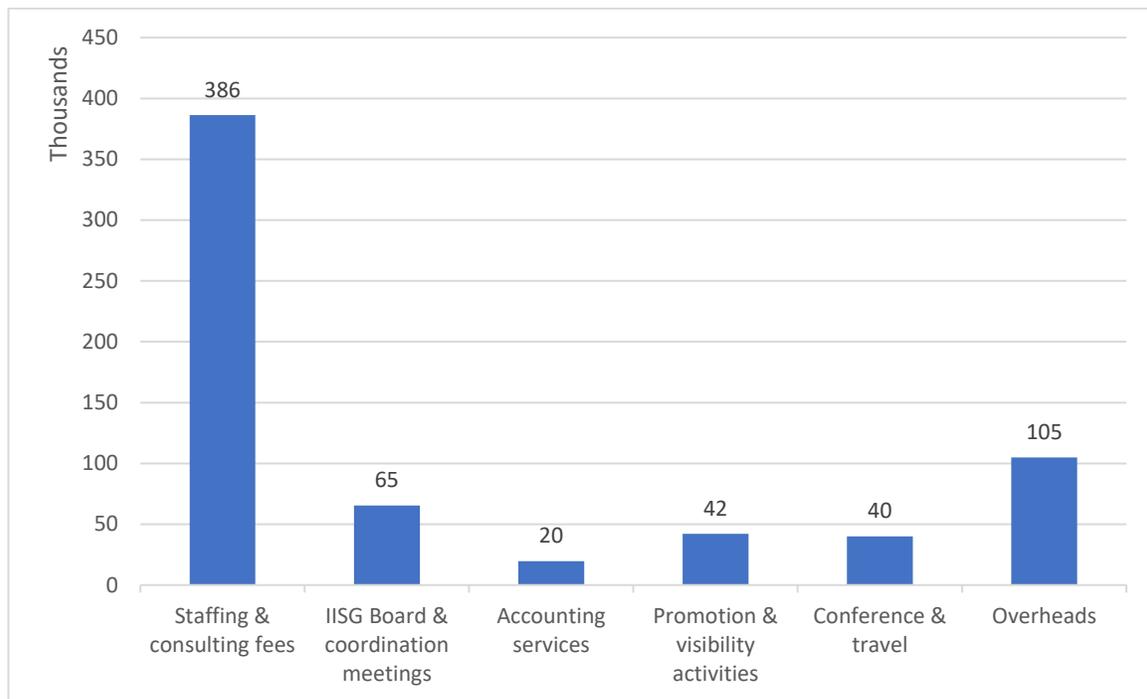


Figure 11. Total operating expenditure, by categories, for the period of Apr 2017- Sep 2018.

Total operating expenditure, as per financial statements made available to the evaluation team, for the IISG mechanism for the 18-month period from April 2017 to September 2018 was € 658,295; 59% of this expenditure was staff costs, followed by overheads (16%) and coordination meetings (10%). The remainder of the information can be gleaned from Figure 11. For a complete table on expenditure by activity, refer to [Annex VII](#).

While these data indicate that the IISG mechanism operated on a small budget, the question then is: Have these resources been converted into outputs in a manner that indicates an efficient use of resources?

The desk review, stakeholder interviews and informal discussions at various events indicate that while it is too early to measure the degree of efficiency achieved as a result of the IISG mechanism, some positive illustrations highlight improvements in coordination and reductions in duplication of efforts. Stakeholder interviews provided some prominent examples such as the UK Foreign Commonwealth Office's (FCO) plans for establishing a new network for Financial Intelligence Units in Western Balkans. After the IISG Support Group made them aware of an existing network set up by UNODC, these plans were shelved in favour of making increased use of the existing network.

Similarly, the IISG provided important inputs to The Berlin Process, which is one of the most visible EU-WB frameworks. Before its meeting in London in July 2018, the IISG Support Group contributed a paper on the potential further development and roles that the Berlin Process could play in terms of internal security, including on serious organised crime.

In other examples identified by the evaluation team, the IISG initiated an action (Rapid Reaction Plan 2018-2019) intended to align concrete actions of all IISG Partners in terms of mitigating rising irregular migration flows reported in late 2017. The IISG conducted regional meetings, including in Tirana in early October, with the aim of aligning EU and WB policies in the next fiscal year (Sep 2018-Sep 2019). Similarly, at a SEPCA assembly in Belgrade, the IISG brought together stakeholders to enable collaboration, prevent duplication and further alignment with the EU Policy cycle, contributing to a renewed, IISG-aligned direction of this existing regional framework at the level of police chiefs. This culminated in the agreement reached to formalise IISG-SEPCA partnership at Skopje in Dec 2018. The Joint EU-WB action plan on counter-terrorism proposed by the IISG was endorsed by the EU-WB Justice and Home Affairs (JHA) ministerial summit in Tirana in October 2018. This plan seeks to align technical assistance efforts in the Western Balkan with the EU policy cycle, improve awareness and coordination, and reduce duplication.

Beyond WBCSCi, the IISG also pioneered the concept of the P-R-A (Prevent-Refer-Address) model on the basis of the gap analysis that showed crucial policy gaps in Western Balkan reform and capacity building efforts toward Prevention and Countering Violent Extremism (P-CVE). This model was agreed among WBCTi partners and subsequently endorsed by the IISG Board as a direction of further reform and external assistance. Similarly, at the request of the Centre for European Perspective, the IISG provided inputs on newly arising policy areas and challenges in the field of cybersecurity.

Various stakeholders also suggested that informal consultations among donors and technical assistance providers has led to increased awareness of ongoing projects. This increased awareness is, in turn, expected to translate into reduced duplication of efforts. Some stakeholders indicated that they do consider this information in planning their activities in the region.

However, the evaluation did note some ongoing duplication such as two training events on financial investigations in Kosovo* in the same week, targeting essentially the same audience (See [Annex VI](#) for details). This was in line with indications from beneficiaries that they had often been subjected to more training than was necessary for their needs. While conceding that some duplication was still ongoing, these stakeholders indicated that the right counterfactual for evaluating the efforts of IISG in this regard is not that there is still some duplication going on, but that it is at a comparatively lower level than it was in the prior timeframe.

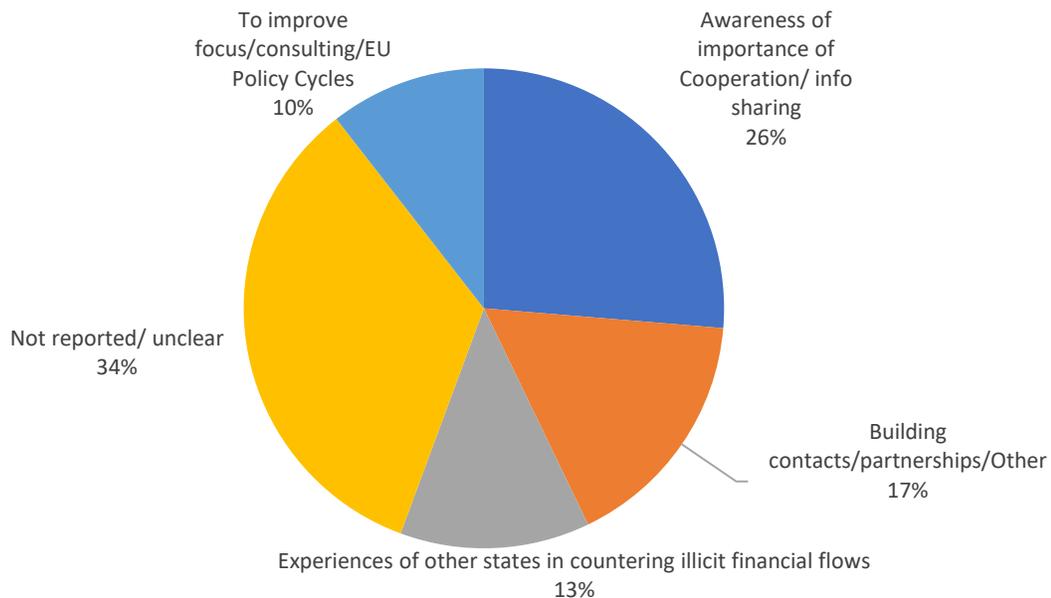


Figure 12. Main learnings from the meetings

In this context it is also worth recalling that feedback surveys completed by trainees and meeting participants indicate satisfaction with collaboration opportunities (Figure 1) and that they regarded informal discussions and collaborations among the most important components of the training provided (Figure 2). Interestingly, most of these trainees and participants also recognised aspects of networking and collaboration as one of the important learnings from the event they attended (Figure 12).

Thus, overall, the IISG mechanism appears to be contributing to reduced duplications and increased efficiency, however it is too early to quantify the degree to which this is happening.

Summary - Efficiency

The IISG mechanism is operating on a small budget but appears to be contributing to increased informal coordination and collaboration, leading to reduced duplication and increased efficiency of resource use for countering SOC in the Western Balkans region.

Partnerships and cooperation

Evaluation questions:

- To what extent is the WBCSCi/IISG pillar II, in the context of the larger IISG, supporting policy coordination of beneficiaries and partners?
- To what extent is the process for cooperation and partnership under the IISG, including inter-pillar with pillars I and III as well as intra-pillar, in place and appropriate?

The concept of the IISG constitutes a policy-level approach that aims to assist the Western Balkan jurisdictions in internal security development in a coordinated and functionally integrated manner – in that it not only coordinates the efforts and investments of external (including EU) assistance, but also integrates relevant regional or other instruments and tools to improve their functionality and long-term sustainability. At the September 2017 IISG Board meeting, among other agreements, Ministers stated that they “welcome the partnership concept, representing a central and key dimension of the future cooperation in IISG implementation, and appeal to all IISG partners to consult the IISG tools and its three pillars when entering upon the planning of their future activities.”

The importance that the relevant IISG Board members place on the issue of partnership and cooperation within the IISG can be seen from the high-level political agreement. Indeed, the IISG precept (i.e. identifying and coordinating relevant project activity in the Western Balkan region) depends upon partnership and coordination. It therefore falls upon the IISG to ensure it forms partnerships with those donors, beneficiaries and other actors and stakeholders to fulfil its objectives around activity coordination.

The IISG does not deploy a systematic process through which it identifies the most appropriate partners to deliver on its objectives. This does not mean that the partners with which the IISG currently works are not the most appropriate, rather, that there is no methodology in place through which their selection has been justified. Given the breadth of potential partners with which the IISG may have to interact across all three pillars, this lack of a robust selection process to include or exclude certain partners leaves the IISG open to criticism.

The IISG does not have the resources to try and engage with all potential actors, and it does not have concrete criteria against which it can demonstrate why it has engaged with some partners and has engaged to a lesser extent with others. If these criteria existed, it can then justify the reason(s) for a lack of closer engagement and cooperation with, for example, Civil Society Organisations (CSOs) which at time of writing are not part of the IISG, the Southeast European Law Enforcement Centre (SELEC) and the United Nations Development Programme (UNDP) both of which are fully fledged IISG partners; reasons which are currently left unexplained. This lack of due process can give rise to questions being asked on the possible dilution of impact of the IISG through lack of engagement. In one instance the UNDP was running a year-long training for Financial Intelligence Unit (FIU) investigators in the region, which IISG was not involved with.

However, the overriding comment from the *beneficiary* partners²² to the WBCSCi/ IISG is that partnership and cooperation generally works well. There was consistent praise for the access the project provides to partners outside the region where EU systems, processes and language differences can create barriers to cooperation. Using the project, some partners are looking to sign Memoranda of Understanding and Memoranda of Cooperation with new partners to facilitate cross-border cooperation in tackling serious

²² Beneficiary partners include Financial Intelligence Units, Public Prosecution Offices (for Organised Crime), the police (departments for the fight against serious and organized/organized crime and international police cooperation), the border police, the Ministries of Justice (departments for international judicial cooperation), the Ministries of Interior and other relevant law enforcement agencies in beneficiary countries including prosecutors

organised crime. Also, within the region many beneficiary partners highlighted the importance of the project partnerships in facilitating access to new knowledge (through training), to relevant expertise (e.g. forensic experts) and the exchange of knowledge with regional colleagues and counterparts. The breadth of partnerships was also highlighted as advantageous and identified by some beneficiaries within Pillar II noting the opportunity it has provided for them to meet with new partners. For example, a beneficiary mentioned meeting with a relevant CSO in the areas of Trafficking in Human Beings (THB) and Smuggling of Migrants (SoM). It should be stressed that these opportunities to meet with CSOs occur ‘in the margins’ of IISG meetings and are more a product of chance than of any systemic approach to multi-agency, multi-actor coordination. As noted in the Design section of this report IISG engagement with CSOs could be improved and this example simply serves to highlight the importance of this aspect.

There was general agreement that the partnership and cooperation facilitated by the IISG have also worked well regarding the EU Action and its pre-accession objectives with respect to the Western Balkan region countries. Many of the partners engaged with the IISG noted the access the IISG had provided to regional partners as well as the appropriate EU institutions and expertise to drive forward progress in this area.

There was less positivity when it came to *donor* partnership, cooperation and coordination. Whilst many of the key donors have been identified and are engaged on a regular basis, the IISG remain unsighted on some bilateral funding agreements reached by beneficiaries through national embassies or capitals. This draws attention to the fact that the IISG does not appear to have developed and maintained an appropriate mapping document of donors, beneficiaries and projects / programmes both regionally and country-by-country. Further, engagement with EUDs in each of the beneficiary jurisdictions was noted as lacking sufficient development.

The lack of a robust procedure for identifying relevant partners coupled with no discernible process for mapping relevant donor / project activities highlights both a strength and weakness of the IISG. Under its current approach it has great flexibility in being able to quickly approach potential new partners (or existing) partners and provide a space for partnership and cooperation to encourage integration and eradication of duplication of similar project activities. There is no need to go through a cumbersome administrative procedure.

Yet this lack of due process has contributed to a coordination blindness at times with similar trainings, funded by the EU and involving IISG partners running at the same time. And without due process, this ‘flexible’ approach can be perceived as ad-hoc and leaves the IISG open to questions being asked on accountability and transparency on how, what and with whom they engage. One partner, for example, stated they felt they were only included by the IISG as a partner when it suited the IISG to include them.

While intra-pillar II partnership and cooperation was, in general, well-regarded, the processes for inter-pillar partnership and cooperation appear relatively weaker, although the Rapid Reaction Plan is a good example of the coordination and cooperation between the three pillars. Even though this plan specifically addresses migratory flows, it requires coordination across all three pillars to make it work. Inter-pillar coordination is explicitly

referred to within the Terms of Reference of the IISG²³ which states “The IISG Support Group is tasked with the following: consistent and systematic inter-pillar coordination, involving constant communication between the members. Inter-pillar coordination is thus a shared responsibility of the IISG SG Chair and all IISG SG members.” There does not appear to be any ‘systematic’ approach nor is there ‘constant communication’ thus, there may be advantages in formalising how inter-pillar partnership and cooperation should work which could include devolving some of the responsibility to the Lead Partner(s) of the relevant pillars. Given the horizontal, cross-cutting facilitating factors impacting all three pillars (e.g. money laundering, border management, transportation, corruption) this inter-pillar coordination is critical.

Mapping

Part of the intervention logic of the IISG is to avoid duplication of effort by coordinating WB regional activities falling within its three pillars. This ideally requires an overview of all these activities which implies the need to identify and map them. There does not appear to have been a systematic approach taken to this at the inception of the IISG which, instead, relied upon the knowledge held by a few of the key individuals involved with the development of the IISG concept. In the course of this evaluation research reveals over 50 current or recently implemented projects relevant under the IISGs ToR some of which do not appear to have been identified by the IISG. The IISG relies heavily upon partners, beneficiaries and donors self-reporting to the IISG SG and this does not appear to be a robust enough approach although some progress is being made with an online database of activities now available.²⁴ However, without a bespoke methodology for identifying and mapping activities it is impossible to ascertain whether most of the relevant activities have been considered. It would seem prescient for the IISG to conduct an exercise to ensure no activities are overlooked. This may bring an added benefit of improving intra-pillar coordination.

Summary - Partnerships and cooperation

Partnership and cooperation within the WBCSCi/IISG partners work relatively well, providing space and opportunity for relevant actors to come together for mutual benefit. Whilst many of the most relevant partners appear to have been identified and engaged there is no systemic process for mapping the donors, the beneficiaries and the relevant project activities being pursued across the wide-ranging remit of the IISG. Either the Terms of Reference of the IISG must be narrowed or robust processes be introduced to formalise its decision making on partnership and cooperation engagement. This extends to inter-pillar partnership and cooperation.

²³ IISG in the Western Balkans Terms of Reference, 8th September 2017, p.5

²⁴ www.wb-iisg.com.

Impact and sustainability

Evaluation questions:

- To what extent is the WBCSCi/IISG pillar II, including the EU action, likely to reduce serious organised crime?
- To what extent is the current set-up of the WBCSCi/IISG pillar II mechanism/structure and the EU action sustainable in the long-term, considering also the ownership of recipients? How can this be improved in the future?

The IISG Terms of Reference as published on the 8th of September 2017 describe the process by which positive impact to tackle serious organised crime under Pillar II will be delivered. The first stage is a needs assessment followed by prioritisation and within this stage the actions to achieve the objective(s) are prioritised under the following criteria:

- (1) those which will offer a result in the short-term;
- (2) those which are addressing the root causes of a problem and/or are of strategic importance and are thus expected to bear *positive long-term impact*;
- (3) those that offer a response to threats estimated as most significant to the internal security of the Western Balkan region and to European security as a whole.

The WBCSCi iPA 2018–2020 reaffirms the aspect of “positive long-term impact”²⁵ and the logical framework also states that impact should contribute to improving “the overall security in the Western Balkans and Europe by addressing the challenges of occurring forms of Serious Crime.”

Given that the IISG and EU action plan have been running for approximately one year there is (understandably) insufficient data from which any definitive results can be drawn regarding the positive long-term impact to improve overall security in the WB region (and Europe) from serious organised crime. It will be necessary to be able to assess that impact in the future and the WBCSCi iPA 2018–2020 logical framework provides 57 indicators through which the various project activities can be measured. However, most of these indicators are quantitative and output centric, focusing on number(s) of people trained, number(s) of trainings etc. and do not possess the potential to assess outcomes and / or impact, whether short, medium or long-term.

Many of the activities delivered under the IISG and EU Action umbrella focus on training and many stakeholders advised that without the funding provided these trainings would never have happened. However, the impact of this training on the overall objective must be well-understood and evidenced to ensure real added value is provided. The evaluation noticed an over-reliance on training activity in the region. While many of the trainings themselves are viewed as useful by the participants, there is no obvious continuum that ultimately results in a positive impact in tackling serious organised crime.

²⁵ WBCSCi iPA 2018 – 2020 p.7

There are individual examples of non-training project activities having an impact at a more ‘operational’ level

And, reflecting on what was stated about training, it was advised that if it wasn’t for the financial support of the EU Action these activities would never happen, even though they

EU Member States approaching regional partners to initiate joint investigation teams (JITs) and promote joint actions. It was noted that not only was there a direct impact from this i.e. arrests of individuals, but an unexpected impact in-so-far as the Western Balkan partners to the Action felt ‘included’ and part of the bigger picture.

Fostering *ad hoc* networking opportunities between participants to meetings promoted and supported by the IISG which have encouraged closer operational cooperation and activity.

are considered by beneficiaries as incredibly important for operational impact. Many respondents said the promotion of operational activities provided the greatest impact, yet this must be tempered by the fact that the majority of those providing that feedback were operational law enforcement officers.

In parallel with the objective to have a positive impact on tackling serious organised crime in the region, another fundamental objective of IPA II is to contribute to the sustainable development of the beneficiaries by promoting European values, policies and standards including where appropriate the *Acquis Communautaire* with a view to EU membership. Examples were provided to the evaluation where the ongoing work of Western Balkan beneficiaries in harmonising their legislation with EU requirements has eased collaboration not only with EU MS but between WB countries as well. This highlights the critical aspect of beneficiary ownership in achieving sustainability. Again, it is too early in the process to be able to draw any firm conclusions on the impact of the approach and EU Action, but the integral assumption which holds that beneficiary ownership is key to sustainability is – tentatively – supported by the data to date.

As part of the field research, the evaluation team reviewed the extent to which the activities undertaken by the IISG/WBCSCi and the EU Action are sustainable, with or without further support, and the degree of ownership being demonstrated by jurisdictions that are partners in the IISG/WBCSCi and the EU Action. The evaluation findings provide a mixed picture. Beneficiaries have indicated that the type of activity funded is sustainable in the sense of being highly desirable and deemed important in the long-term. Indeed, field research showed that a considerable amount of funded activity involves operational support for actual cases with an international component. As mentioned above and in previous sections, beneficiaries were also keen to note the importance of contacts which are being built though this project and can be further developed and sustained in the future. Implementing partners were more likely to focus their assessment of sustainability on routine regional cooperation and training activities and study trips; this led to greater concerns about sustainability and unease about the ongoing overlap and over-provision of donor-funded activities in the region.

More specifically, many *beneficiaries*, particularly police officers, found the financing of operational meetings the most important part of the project. In most Western Balkan jurisdictions, there are no national budgets for such meetings. There are, however, other projects that could be tapped into to provide similar type of support. The work would take longer and use more administrative resources, but the type of work undertaken would not necessarily stop through lack of funding. Among prosecutors, there was greater focus on skills and practice gained from mentorship and interaction, outcomes deemed sustainable over time. The evaluation found some variation, with more national resources available in countries in more advanced stages of EU accession discussions. Beneficiaries also stressed that though they appreciated the flexibility of the project, ownership and sustainability were likely to be enhanced if more initiatives came from the Western Balkan jurisdictions (rather than from the IISG). Overall, the usefulness of the activities, the flexibility of funding, and the ease of access to relevant expertise all contribute to reasonable levels of ownership by WB beneficiaries.

For the *implementing partners*, to the extent that sustainability was seen as something worth addressing at this very early stage of the project, assessments were more critical. Interviewees identified four areas that merit attention:

1. **Training:** For training to lead to sustainable practices, training needs to target and be limited to officials with the appropriate skills and positions. At the same time, a sustainable training partnership goes both ways; Western Balkan police and prosecutors have much expertise as well and this could be better used in designing activities.

The logical framework for the WBCSCi notes some approaches for encouraging sustainability in training including train-the-trainers courses and embedding training into the curricula of appropriate national bodies. For example, the new training curricula for public officials on good governance and combating corruption introduced at the School of Public Administration in Albania. The Lead Partner of Pillar II has also identified curricula integration and trainer development as a key component of training sustainability. In Serbia, for example, the aim is to produce certified trainers in financial investigation who will develop the national curriculum in the local language and in line with Serbian legislature. CEPOL and UNMIK are in discussion with the Kosovo* Academy for Justice and the Academy for Security Training to embed asset confiscation training into their respective curricula.

2. **Programme visibility:** Sustainable programmes are usually publicly visible and that often implies strong links or engagement with civil society actors. The evaluation found limited evidence of this.
3. **Local perceptions of the EU on regional SOC matters:** Sustainability is also about making the EU a well-regarded partner in the region on these issues. There is a perceived lack of coordination between the IISG and the regional framework on the one hand, and national EUDs on the other, which risks exposing the EU. Many implementing partners (of this project but also others on the same substantive issues), share the view that sustainability questions cannot be seriously addressed so long as there is an abundance of funding and overlapping projects in the region.

4. Institutional structures and personnel: The IISG framework is seen as sustainable in narrow funding terms. The broader sustainability of the IISG framework, however, was challenged as it appears to be dependent on individuals rather than on well-established norms and processes.

Summary – Impact and sustainability

It is too early in the process to identify any long-term impacts. There is reporting that on a meeting by meeting basis (often with an operational focus) positive outcomes are being achieved. The logical framework indicators are in need of greater clarity in order to measure impact. The EU accession process provides opportunity and leverage to focus beneficiary activity in Pillar II areas towards achieving a reduction in serious organised crime in the region and Europe. Although it is early in the process to assess sustainability, the activities are seen as highly valuable by beneficiaries who are showing ownership and would strive to have such activities funded in the long-run. For implementing partners, the picture is more mixed.

III. CONCLUSIONS

On the basis of findings discussed in the previous section, the evaluation concludes that:

1. IISG leadership identified and targeted the right ‘customer need’ for increased coordination of technical assistance in Western Balkans. The visionary role played by the IISG Support Group leadership helped bring key stakeholders together and laid the foundation for a more effective and efficient institutional response to serious organised crime.
2. However, like any early-stage start-up, the IISG lacks established norms and processes. Working with a small operating budget, the IISG has been able to provide an important ‘proof of concept’ for the new ‘venture’. Managing its growth and delivering on results, however, especially in view of upcoming potential leadership changes, will require more systematic management systems.
3. Relatedly, the IISG’s rapid expansion with few systemic processes and procedures in place to underpin its work will likely result in difficulties in justifying the course of action it has taken. This is of key importance when considering how the IISG identified and coordinated proposed and ongoing activities within the region under its three pillars.
4. It should be further recognised that there are many factors outside the control of the IISG and EU Action, which will ultimately determine the level of overall security in the region and Europe with respect to serious organised crime. Thus, the future measurement of impact (and the validity of the WBCSCi/IISG structure to facilitate that impact) on the overarching objective of reducing serious organised crime must be developed and anchored in those areas that are within WBCSCi/IISG control and remit.
5. The concept of the IISG is widely recognised as a potentially effective tool for regional coordination, however stakeholders have conflicting opinion on its current effectiveness level. While many stakeholders are satisfied with the concept of the IISG, some are impatient to see results.
6. Relatedly, stakeholders from beneficiary jurisdictions raised a specific question pertaining to EU Action that needs to be addressed at the level of EU and IISG board, viz. is the larger objective of EU Action and IISG mechanism EU accession or strengthening of law enforcement, regardless of the Accession framework?
7. While the IISG is using Results-Based Management (RBM) to some extent for planning purposes, it is not systematically collecting data for monitoring and evaluation. A better integration of results frameworks would significantly improve the ability of implementing partners, the IISG Support Group, Member States, beneficiaries and the EU to discuss the value and effectiveness of the IISG and the WBCSCi. This integration is lacking currently within the EU Action (between implementing partners and between the logical frameworks of implementing partners and the Action’s logical framework). Integration is also missing within the IISG (visible in the iPA 2016-2020 document) and between the EU Action and the IISG,

notwithstanding the attempts that have been made to better integrate the work of implementing partners and the IISG mechanism. One key to success for the IISG is this better integration of the work of funded organisation - a better-defined results framework/ an overall Theory of Change can facilitate the processes by which the EU, the IISG Support Group and WB jurisdictions achieve better results through the IISG mechanism.

8. Although it is too early to measure impact in the context of both the IISG WBCSCi and the EU Action, the proposed indicators within the logical framework lack the potential to measure short, medium or long-term impact. This is of greater importance when it comes to measuring the potential impact of training in tackling serious and organised crime since many of the activities focus on capacity building through training.
9. The IISG has been successful at developing partnerships and cooperation with many key actors in the region including beneficiaries and law enforcement agencies, however other partnerships such as with the EU, CSOs and SELEC could be enhanced/ developed. It has also been successful at generating critical buy-in at the political level in the region, but a systematic approach towards mapping them could be very useful.
10. HRGE considerations are acknowledged to be important in general, but their actual use in designing and implementing interventions so far appears to have been somewhat limited. This is due to them not being considered as relevant to SOC in particular.
11. While DCAF has been instrumental in providing early foundations and enabling the success of the IISG, it is worth re-examining whether it continues to be the right location for IISG. This question should include consideration of its status as an independent body as well as its geographic location in view of limitations confronted by IISG.

Overall, the findings and conclusions of this evaluation can be summarised with the help of the SWOT analysis in Table 3.

Table 1. SWOT Analysis for the WBCSCi/ IISG Pillar II

Strengths	Weaknesses
'Proof of concept'	Underdeveloped systems and processes
Ability to bring decision-makers on the table	Uneven stakeholder involvement
High visibility and presence	Weak results-based monitoring systems
Operating on shoestring budget	Inadequate attention to HRGE issues
Opportunities	Threats/ Challenges
High donor interest and funding in the region	Easy funding opportunities for beneficiaries
Visible need for better coordination	Stakeholder impatience for quick results
Operational coordination	Organizational location: Limiting to stakeholders?
Independent organisational structure	Unclear and conflicting stakeholder expectations

IV. RECOMMENDATIONS

Recommendation 1 – Increased institutionalisation of norms and processes:

The IISG Support Group is encouraged, especially in view of impending leadership change, to establish more systematic management systems and processes to move from a start up to a more mature institution.

Recommendation 2 – Stakeholder expectation management:

The IISG Support Group needs to clarify and manage stakeholder expectations on results as it takes time to build infrastructure and processes for effective coordination.

Recommendation 3 – IISG Support Group:

IISG is encouraged to re-examine the organisational set-up as well as objectives and mechanisms of the IISG, including structural independence, for the IISG Support Group. The IISG Support Group, in consultation with all relevant parties, should develop and provide detailed proposals for the consideration of the board.

Recommendation 4 – Strategic choices:

IISG, in close consultation with the WB jurisdictions, should make a greater effort at prioritisation of priorities. Further, it should develop and implement a methodology for regularly mapping all country and regional activities relevant across all three pillars to facilitate planning and minimise the risk of duplication of key activities in the WB region.

Recommendation 5 – Partnerships:

IISG should develop and implement a mechanism for reviewing the effectiveness of its current partnerships, including with the EUDs and CSOs. This mechanism should further identify potential new partnerships and examine how inter-pillar partnership can be improved. Development of relationships with EUDs in the focus jurisdictions is also an indicted priority of partnership building.

Recommendation 6 – Theory of change:

The IISG Support Group and leaders of the implementing groups of the EU Action are encouraged to engage technical assistance within a results-based design and management framework to strengthen the correlation of results logic within IISG frameworks (logframe and iPA) and between these frameworks and those of the EU Action and the logframes of implementing groups of the Action. The intent of this initiative would be to develop an overarching Theory of Change for the WBCSCi component of the IISG, incorporating all aspects of the EU Action, and through this Theory of Change have a single integrative tool for the work of all of these actors.

Recommendation 7 – Ownership of the mechanism:

IISG needs to enhance the role, involvement and ownership of IISG mechanism for the beneficiary jurisdictions, working via the mechanism of IISG board.

Recommendation 8 – RBM systems:

The IISG Support Group is encouraged to make a greater effort at systematically collecting data for monitoring and evaluation. The indicators for measuring the future impact of the IISG and the EU Action also need to be reworked in line with their respective Terms of Reference.

Recommendation 9 – HRGE considerations:

The IISG Support Group needs to make more explicit use of human rights and gender equality considerations in working with implementing partners on designing and implementing interventions. This would help ensure that the intended focus on HRGE is an actual focus of implementation.

Recommendation 10 – Donor reporting:

European Union representatives and IISG Support Group need to develop and agree on clear guidelines and expectations on results and reporting expectations along with pre-defined timelines. There is also a need to address questions pertaining to the larger objectives of the coordination and intervention mechanisms.

Recommendation 11 – Harmonization:

The EU needs a clear and common theory of change with all implementers of EU Action on board for planning and coordination. They should all have clear and pre-determined contributions to impact and outcome targets, which will help plan, monitor and evaluate contributions to results.

V. LESSONS LEARNED AND BEST PRACTICES

The lessons learned and best practices identified by the evaluation team are noted below for other organizations, projects and programmes of similar nature:

- 1) The gap analysis performed by the IISG leadership to understand ‘customer needs’ for increased coordination of technical assistance in the Western Balkans region represents a best practice that other organisations/ projects/ programmes should consider emulating. As a result of this environment scan and deep understanding, the IISG has succeeded in understanding and addressing their ‘market’.
- 2) The IISG, by engaging in extensive consultations, needs assessment and trust-building activities, has been very successful at earning the trust of beneficiaries and buy-in at the political level, which again represents a best practice.
- 3) A formative evaluation in early stages of establishing organization and mechanisms indicates an interest in culture of evaluation and organization learning. Not only should other organizations, projects and programmes of similar nature should use this as a best practice example, but that IISG itself should take steps to sustain this over the long run.
- 4) In terms of lessons learned, the need for greater institutionalisation of management systems and processes for sustainability is readily apparent. Other organizations, projects and programmes of similar nature, not to mention the IISG itself, would do better to focus on this aspect in their designs and structures.

ANNEX I. EVALUATION TERMS OF REFERENCE

Background and Context

Europol’s strategic analytical reports have revealed a changed criminal landscape in Europe. Organised Crime Groups (OCGs) are using a crime-as-a-service business model and trading in diversified commodities, which means that Serious and Organised Crime (SOC) invariably seeks to change the commodities which promise better criminal profits at lower risk. OCGs are increasingly flexible, becoming more inter-connected and cooperative at international level but also financially and politically stronger and engage in multiple forms of crime, and finally, cheaper means of transport and ways of communication, including internet, make criminal groups from both sides more mobile and even closer. As indicated by the *EU Global Strategy* (2016), the challenges of migration, energy security, terrorism and SOC are shared between the EU and the Western Balkans.

The United Nations’ Office on Drugs and Crime (UNODC) report *Drug Money: The Illicit Proceeds of Opiates Trafficked on the Balkan Route* (2015) revealed credible amounts for the value of opiates trafficked through the Western Balkans' jurisdictions and showed that the effect as a percentage of GDP is broadly above European averages.

Jurisdiction	Best Estimate of Gross Profit from Heroin Trafficked in Jurisdiction, USD	Gross Profit of Heroin Trafficked as a Percentage of GDP²⁶
Albania	320 million	2.422%
Bosnia and Herzegovina	40 million	0.219%
Kosovo*	25 million	0.338%
the former Yugoslav Republic of Macedonia	39 million	0.344%
Montenegro	11 million	0.240%
Serbia	33 million	0.075%
Annual Average for Western and Central Europe		0.11%

The region has been identified as having significant deficiencies as to combatting SOC, especially when it comes to tackling its financial dimension. At the same time, the nature of modern SOC challenges in/emanating from the region calls for a coordinated and more efficient approach at the EU level in assisting the Beneficiaries to tackle them and in

²⁶ GDP figures sourced from the World Bank. <http://data.worldbank.org/data-catalog/GDP-ranking-table>

furthering operational cooperation – in view of the need to close the gap between internal and external dimensions of Justice and Home Affairs (JHA).

The 2014 Report on Gap Analysis on Regional Cooperation in the Area of Migration Management and Fight against Serious and Organised Crime²⁷ provided important findings on the state-of-play in regional cooperation, including recommendations as to the streamlining to ensure both cost-benefit efficiency in utilising available resources for further reform on the one hand, as well as to functionally integrating existing regional mechanisms (incl. working bodies and regional agencies) on the other hand. The analysis also identified instances of duplications in implementing activities on part of external actors, where EU policies toward the Western Balkan region were no exception – i.e. numerous sets of priorities related to the fight against SOC, terrorism and irregular migration challenges endorsed and handed over to national law enforcement agencies, which were either not followed or remained unknown to most international security actors and donors. Interviewees in 2014 recognised a lack of a common direction and a lack of coordination in the area of regional cooperation (i.e. among the initiatives, programmes, actors present in the region, acting multi-laterally/regionally or offering bilateral assistance). Policy goals were addressed both nationally as well as regionally, and therefore optimizing a shared regional approach was necessary to efficiently address the priority fields such as countering SOC. In 2014, the interior ministers at the annual Brdo Process Ministerial Conference endorsed the findings of the above-mentioned analysis.

As of 2015, the *Western Balkan Counter-Terrorism initiative* (WBCTi) has represented a joint, coordinated approach to assistance and regional cooperation in the Western Balkans, representing the first wide and consistent policy attempting the integration of all external assistance actions within a concrete policy field in the context of EU-Western Balkan relations. Its main aim is to integrate the assistance on part of the EU (including the objective of the Enlargement and Justice and Home Affairs policies), other international assistance and regional cooperation in the counter-terrorism field, minimizing duplications of action and maximizing cost-benefit efficiency. It is backed also by the European Commission–Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR), who oversees the progress of the Western Balkan (prospective) EU Candidate Countries, and supported by more than 50 relevant actors²⁸.

The European Commission (EC) action “Support to the Western Balkan Integrative Internal Security Governance” (IPA 2017/039-402.09/MC/Security Governance) – referred to as “action” throughout the ToR - under the Instrument for Pre-Accession Assistance (IPA II) 2014-2020 focuses on some of the major gaps in areas posing the gravest challenges to the region - including countering money laundering, forgery of travel documents and financing of terrorism as a result of SOC activities – by improving (financial) criminal investigation. In line with the objectives of the EU Enlargement Strategy 2014, the action is supporting a future EU policy model, which will become a tool

²⁷ RCC 2014. Accessed at RCC Website. <http://www.rcc.int/docs/366/report-on-gap-analysis-on-regional-cooperation-in-the-area-of-migration-management-and-fight-against-serious-and-organised-crime>

²⁸ Council of the EU 2015. Conclusions of the Council of the EU and of the Member States meeting within the Council on the Integrative and Complementary Approach to Counter-Terrorism and Violent Extremism in the Western Balkans. <http://data.consilium.europa.eu/doc/document/ST-14986-2015-INIT/en/pdf>

to further deepen cooperation on key foreign policy issue and strengthen EU governance of that cooperation.²⁹

The action will deliver an integrative and coordinated approach to countering SOC in/emanating from the Western Balkan region – based on the *Integrative Internal Security Governance (IISG)* concept – by integrating existing instruments and all relevant actors’ future and planned efforts, in line with the methodology used in case of the IISG first pillar – WBCTi, expanding the concept to SOC (Pillar II: *Western Balkan Counter-Serious Crime initiative-WBCSCi*) and - to a much lesser degree - border security (Pillar III – *Western Balkan Border Security initiative-WBBSi*). *At its core*, the action will support the introduction of the IISG model by supporting its Pillar II – *WBCSCi*, whose coordination, as well as the inter-pillar coordination, monitoring and evaluation framework will be the task of the IISG³⁰. The planning and implementation of the *WBCSCi* will require a full involvement of relevant action partners – a group of regional, international and EU initiatives/agencies/organisations, gathered in an informal working group during the preparation process, e.g. – Europol, Eurojust, Interpol, UNODC, CEPOL, Italian Ministry of Interior, GIZ, CILC, PCC SEE, OSCE, EUMS, Western Balkan Security Structures, NI-CO. The preparation of the *WBCSCi* Plan of Actions 2018-2020, undertaken by the IISG, invited an even wider group of state and non-state donors in Western Balkan regional cooperation to contribute.

Main objective of the EU action

The action will deliver an integrative and coordinated approach to counter SOC in/emanating from the Western Balkan region, based on the IISG concept. The overall objective is to “improve the overall security in the Western Balkans and the EU by combatting organised crime and terrorism”³¹. The specific objective is to “counter serious crime and terrorism based on intelligence led policing, financial investigations through an effective and functioning Integrative Internal Security Governance in the Western Balkans”.³²

Activities under the action

²⁹ European Commission – Instrument for Pre-Accession Assistance (IPA II) 2014-2020. Multi-Country Support to the Western Balkan Integrative Internal Security Governance. 2017 – available under: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf

³⁰ The actual evaluation will be conducted independently by the UNODC Independent Evaluation Unit and a team of independent evaluators.

³¹ European Commission – Instrument for Pre-Accession Assistance (IPA II) 2014-2020. Multi-Country Support to the Western Balkan Integrative Internal Security Governance. 2017 – available under: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf.

³² European Commission – Instrument for Pre-Accession Assistance (IPA II) 2014-2020. Multi-Country Support to the Western Balkan Integrative Internal Security Governance. 2017 – available under: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf.

The activities foreseen under the EC action are relating to the following six areas – detailed information on all activities can be found in the EC action document on pages 11ff):³³

1. Training,
2. Mentorship,
3. Information Sharing and Mutual Trust,
4. Support in formation of Joint Investigation teams,
5. Support to Liaison officers at Eurojust and of and at Europol,
6. Capacity building for strengthening the Beneficiaries efforts in fighting against migrant smuggling.

The Integrative Internal Security Governance³⁴

The Concept of Integrative Internal Security Governance (IISG) in the Western Balkans was formally endorsed by the Council of the EU with the adoption of the “Council Conclusions on strengthening the EU internal security's external dimension in the Western Balkans including via the Integrative Internal Security Governance (IISG)”³⁵ in late 2016. It was later supported by the ministers of the Western Balkan region at the EU–WB JHA Forum. The integrative and complementary approach was thus extended from the existing WBCTi Pillar to two other areas of internal security – WB Counter-Serious Crime Initiative (WBCSCi) and WB Border Security Initiative (WBBSi).

The main goal of the IISG is to integrate EU and international assistance in the three prominent areas of Internal Security, to reduce duplications of action among the existing and planned efforts of various actors and maximise the efficiency of achieving jointly agreed priorities –both in capacity building and operational cooperation. On 8th September 2017, the IISG Board – ministers of the Western Balkan Governments – officially established the IISG Support Group³⁶ and divided the tasks among the Lead Partners of the respective Pillars:

1. Slovenia, Austria and the Democratic Control of Armed Forces (DCAF) Ljubljana for the WBCTi,
2. PCC SEE Secretariat, together with the UNODC (proposal) for the WBCSCi³⁷, and
3. Austria and DCAF Ljubljana for WBBSi.

³³ European Commission – Instrument for Pre-Accession Assistance (IPA II) 2014-2020. Multi-Country Support to the Western Balkan Integrative Internal Security Governance. 2017 – available under: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf

³⁴ This information is based on the document: DCAF support to the Integrative Internal Security Governance (IISG) in the Western Balkans, 2018 (<http://wb-iisg.com/wp-content/uploads/bp-attachments/4278/DCAF-brief-IISG.pdf>).

³⁵ <http://data.consilium.europa.eu/doc/document/ST-15413-2016-INIT/en/pdf>.

³⁶ The Terms of Reference for the IISG Board, Support Group, Chair as well as Lead Partners is available here: <http://wb-iisg.com/wp-content/uploads/bp-attachments/4285/IISG-ToR-Adopted.pdf>.

³⁷ In line with the conclusions of the 2nd Integrative Internal Security Governance (IISG) Board Meeting, the IISG Board “endorsed the role of the United Nations Office on Drugs and Crime (UNODC) as a Lead Partner in Pillar II (Western Balkan Counter Serious Crime Initiative) together with the Secretariat of the Police Cooperation Convention for South Eastern Europe”.

IISG partners

- National security authorities from Albania, Bosnia and Herzegovina (BiH), Kosovo*, former Yugoslav Republic of Macedonia, Montenegro and Serbia with competence over counter-terrorism (CT), preventing/countering radicalisation and violent extremism (P/CVE), countering Serious and Organised Crime, and Border Security;
- UN, EU and other international organisations;
- 3rd state donors, leadership of regional mechanisms;
- Non-governmental organisations.

The three Integrative Plans of Action (iPAs) for 2018-2020 were endorsed on 16 March 2018 by the IISG Board and will be made available on the IISG website³⁸. UNODC has expressed intention to join the work of the IISG Support Group by becoming a Co-Lead Partner in Pillar II – WBCSCi.

The Western Balkan Counter-Serious Crime Initiative

The WBCSCi is an EU-supported effort to respond to the developments related to Serious Crime phenomena in the Western Balkans by maximizing the potential of regional cooperation policies and instruments, and by merging the efforts of all relevant security actors in this area of policy development in an efficient – and sustainable – manner.

In September 2017, the ministers of the interior/security (members of the IISG Board) appointed the Secretariat of the Police Cooperation Convention for Southeast Europe (PCC SEE) as the Lead Partner of the WBCSCi. The PCC SEE Secretariat (Lead Partner) entered into preparation of the first multi-annual Integrative Plan of Action (iPA) in late 2017, and submitted a final draft WBCSCi iPA, which was endorsed at the 2nd Meeting of the IISG Board on 16th March 2018, following a lengthy consultation with relevant IISG Partners, incl. EU entities, UN agencies, 3rd state donors, regional and international organisations. Prior to that, during 2016-2017, the PCC SEE Secretariat was also involved in the EU Commission-led consultations among relevant regional and international partners focusing on this area of policy, leading up to the preparation of the IPA II 2017 Multi-Country Action “Support to Integrative Internal Security Governance in the Western Balkans” (IPA 2017/039-402.09/MC/Security Governance). This action supports “the introduction of the IISG model by supporting its Pillar II –Western Balkan Counter-Serious Crime initiative (WBCSCi), whose coordination, as well as the inter-pillar coordination, monitoring and evaluation will be the task of the IISG” (p. 15).

The UNODC Independent Evaluation Unit

³⁸ <http://wb-iisg.com/>.

The United Nations Office on Drugs and Crime (UNODC) is a global leader in the fight against illicit drugs, international and organised crime as well as terrorism. UNODC’s Independent Evaluation Unit (IEU)³⁹ is a leading expert in providing services on accountability within the mandates areas of UNODC. In the past years, IEU has conducted more than 130 evaluations in more than 60 countries across all regions of the world, including complex thematic, regional and global as well as joint evaluations. IEU has delivered highly complex evaluations on sensitive topics such as corruption, terrorism, money laundering, human trafficking and smuggling and other transnational crimes, including in the Western Balkans. It has also built solid evaluation norms, tools, standards that, coupled with the available technical expertise on evaluation, lead to high quality evaluation provider. Therefore, this experience and knowledge will be used to ensure an inclusive and high-quality process for this mid-term independent evaluation process.

IEU will evaluate the WBCSCi in the context of the IISG at large, including activities under the IPA II Annual Multi-Country Action Programme 2017 – Support to the Western Balkan Integrative Internal Security Governance (IPA 2017/039-402.09/MC/SecurityGovernance). The evaluation approach was presented to the “IPA/2017 Countering Serious Crime in the Western Balkans -Steering Committee Meeting” on 15 March 2018. Furthermore, the evaluation framework was presented to the IISG Board on 16 March 2018, who approved the monitoring and evaluation framework for the WBCSCi.

Main objectives and outcomes of the IISG and WBCSCi

Main objective of the IISG

The IISG will improve the governance of internal security cooperation in the region by integrating donor assistance efforts, preventing duplication, identifying gaps and creating synergies by aligning objectives toward shared priorities, and upgrading the existing achievements of capacity building in the area of internal security to enable WB countries to recognise and tackle security challenges.

Further information on the logic of the IISG pillar II (WBCSCi) was detailed in the European Commission document: “Instrument for Pre-Accession Assistance (IPA II) 2014-2020. Multi-Country Support to the Western Balkan Integrative Internal Security Governance”.⁴⁰

According to the WBCSCi Integrative Plan of Action 2018-2020 (final draft)⁴¹, the consultations for the WBCSCi iPA 2018-2020 involved a large number of stakeholders and resulted in the following priorities:

³⁹ UNODC/IEU website: <http://www.unodc.org/unodc/en/evaluation/index.html>.

⁴⁰ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf.

⁴¹ WBCSCi – Integrative Plan of Action 2018-2020 (final draft), <http://wb-iisg.com/wp-content/uploads/bp-attachments/5038/WBCSCi-iPA-2018-2020.pdf>.

- To improve the cooperation between police and prosecution in the investigation phase;
- To increase the capacities of national authorities to conduct financial investigations, incl. national specialised units;
- To identify and address gaps in cross-border operational cooperation in the Western Balkans, incl. based on provisions of existing regional law enforcement cooperation legal bases and in implementing relevant bilateral agreements transferring EU and UN standards;
- To enhance cooperation with Europol and CEPOL and further implement operational agreements with EU agencies;
- To improve contribution of Beneficiaries' authorities to Europol's tools and instruments in the framework of relevant Operational Action Plans and better use of Europol tools, including its deployed Liaison Officers to the Western Balkans;
- To support operational meetings in cross-border investigation cases;
- To improve and support the use of Joint Investigation Teams, incl. enhancing cooperation with Eurojust;
- To consolidate efforts transferring standards and good EU practice on intelligence-led policing in the Western Balkans;
- To ensure synergies between the activities of the EU Policy Cycle in the Fight Against Serious Crime 2018-2021 and activities of this integrative plan of action (incl. by considering of inviting WB partners and IISG Support Group representatives, where relevant, to a National EMPACT Coordinators meeting for a specific session);
- To enable automated exchange of data following EU standards (EU Prüm-inspired framework);
- To implement targeted training in various aspects of investigations, incl. considerations on necessary equipment;
- To enhance interagency (and international) cooperation between cybercrime units, financial investigators and financial intelligence units at the domestic level in the search, seizure and confiscation of online crime proceeds;
- To address the lack of interpretation with a regional pool of interpreters for authorities dealing with migrant smuggling/THB and cross-border investigations;
- To strengthen the capacities of national authorities in the fight against corruption;
- To improve regional cross-border information exchange, incl. in the framework of EU information exchange.

Intervention logic EC IPA II (2017) -Support to the WBIISG⁴²:

⁴² https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf

OVERALL OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS	SOURCES OF VERIFICATION	
To improve the overall security in the Western Balkans and the EU by combatting organised crime and terrorism	<p>Number of investigations related to serious organised crime and terrorism</p> <p>Perception of sense of security among the population and trust in law enforcement</p> <p>Amount of confiscation of criminal proceeds/terror finances</p>	<p>Crime data (stolen cars, drugs confiscated, arrests, convictions, assets recovered, money seized, etc.)</p> <p>Population surveys as those carried out by Belgrade Centre for Security Policy on the perception of the WB Police and of CSOs on integrity on the state of the judiciary</p> <p>Annual reports of DG NEAR</p>	
SPECIFIC OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS	SOURCES OF VERIFICATION	ASSUMPTIONS
To counter serious crime and terrorism based on intelligence led policing, financial investigations through an effective and functioning Integrative Internal Security Governance in the Western Balkans	<p>Number of investigations carried out involving intelligence led policies techniques, focussing criminal proceeds</p> <p>The Security Governance Strategy and Programme for the Region adopted and endorsed by the EUMS and WB JHA ministers</p>	<p>Crime data (stolen cars, drugs confiscated, arrests, convictions, assets recovered, money seized, etc.)</p> <p>Population surveys as those carried out by Belgrade Centre for Security Policy on the perception of the WB Police and of CSOs on integrity on the state of the judiciary</p> <p>Annual reports of DG NEAR</p>	Political will exists making resources available
RESULTS	OBJECTIVELY VERIFIABLE INDICATORS	SOURCES OF VERIFICATION	ASSUMPTIONS
<p>Results:</p> <ol style="list-style-type: none"> Beneficiaries are better equipped in tackling organised crime, major and serious criminal phenomena and terrorism including violent extremism, Improved co-operation and collaboration between WB law enforcement and judiciary and with other bodies (notably those of the EU Member States and the EU Agencies) One overarching Western Balkan Security Governance with integrative plan of actions created and endorsed based on the needs identified by the Beneficiaries and the main donors, indicating the priority, the potential implementing body (and its partners) and the financing. Trust between the Beneficiaries, donors and implementers is increased on cross border and international cases Capacity and confidence among the Beneficiaries in fighting organised crime, terrorism and alike is improved Europol Liaison Officers fully operational in the selected WB beneficiaries 	<ul style="list-style-type: none"> Endorsement by the EUMS and WB ministers of JHA of the integrated plan of actions based on three pillars: Western Balkans Counter Terrorism initiative, Western Balkans Counter Serious Crime initiative and Western Balkans Border Security initiative. Existence of a web based up to date overview of all relevant completed, on-going and planned programmes, projects and actions on counter terrorism, violent extremism, anti-radicalisation, organised crime, judiciary co-operation, etc. allowing to identify missing links and to measure progress and impact Number of operations carried out, and the lessons drawn from these, serving as input for additional operations. Including those in which Eurojust and Europol will be involved or for which E/N channels are used Number of investigations (in particular, those involving the programme) started and completed, accompanied by an overview of the proceeds/assets confiscated Number of persons trained and have contributed to financial investigations, etc. Liaison officers operational. 	<p>Crime data (stolen cars, drugs confiscated, arrests, convictions, assets recovered, money seized, etc.)</p> <p>Evaluation by UNODC</p> <p>Appraisals / reviews by Europol, Interpol, Eurojust, EUMS, etc.</p> <p>Interviews of the stakeholders</p>	<p>Official crime data follows UNODC standards and is available</p> <p>Specialised Agencies cooperate with the ECTs and project staff</p> <p>Europol supports the Western Balkans SOCTA</p> <p>EU MS support the Western Balkans alignment with the Policy Cycle</p> <p>EU Agencies support involvement of Western Balkans in their activities</p> <p>Trust among implementers</p>

OVERALL OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS	SOURCES OF VERIFICATION	
To improve the overall security in the Western Balkans and the EU by combatting organised crime and terrorism	<ul style="list-style-type: none"> Number of investigations related to serious organised crime and terrorism Perception of sense of security among the population and trust in law enforcement Amount of confiscation of criminal proceeds/terror finances 	<ul style="list-style-type: none"> Crime data (stolen cars, drugs confiscated, arrests, convictions, assets recovered, money seized, etc.) Population surveys as those carried out by Belgrade Centre for Security Policy on the perception of the WB Police and of CSOs on integrity on the state of the judiciary Annual reports of DG NEAR 	
SPECIFIC OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS	SOURCES OF VERIFICATION	ASSUMPTIONS
To counter serious crime and terrorism based on intelligence led policing, financial investigations through an effective and functioning Integrative Internal Security Governance in the Western Balkans	<ul style="list-style-type: none"> Number of investigations carried out involving intelligence led policies techniques, focussing criminal proceeds The Security Governance Strategy and Programme for the Region adopted and endorsed by the EUMS and WB JHA ministers 	<ul style="list-style-type: none"> Crime data (stolen cars, drugs confiscated, arrests, convictions, assets recovered, money seized, etc.) Population surveys as those carried out by Belgrade Centre for Security Policy on the perception of the WB Police and of CSOs on integrity on the state of the judiciary Annual reports of DG NEAR 	Political will exists making resources available
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Detailed logical framework of the WBCSCi (outcomes/output)⁴³:

Outputs	Outcomes	Impact/Objective
1.1 Local actors increase their skills and knowledge on investigating Serious Crime and Corruption	1 Sustainable capacities developed for efficient tackling occurring forms of Serious Crime in the Western Balkans, incl. enhanced capacities for	To improve the overall security in the Western Balkans and Europe by addressing the challenges of occurring forms of Serious Crime

⁴³ Adapted from the WBCSCi Integrative Plan of Action 2018-2020 (<http://wb-iisg.com/wp-content/uploads/bp-attachments/5038/WBCSCi-IPA-2018-2020-final-draft-17-Apr-18-final.pdf>).

cooperation between police and prosecution		
<p>1.2 Local actors increase operational capacities enhanced on investigative techniques</p> <p>1.3 Local actors improve their skills on specific needs</p> <p>1.4 Enhanced information sharing and improved intelligence exchange mechanisms</p> <p>1.5 Improved intelligence-led policing in the Western Balkan region</p>		
2.1 Increased rate of investigated Serious Crime and Corruption Cases in the Western Balkans	2 Increased rates of investigated Serious Crime and Corruption cases in the Western Balkans	
<p>3.1 Raised awareness and cooperation established between local actors and relevant EU, UN and other international mechanisms for cooperation</p> <p>3.2 Advanced process of integration into EU frameworks for cooperation</p>	3 Closer alignment with EU and other international mechanisms for cooperation	
4.1 Sustainable provision of equipment and facilities	4 Sustainable use of necessary equipment, based on relevant needs assessments	
5.1 Efficient policy solutions through regional and international cooperation instruments delivered	5 Improved governance of regional and international cooperation relevant for Countering Serious Crime and Corruption in the Western Balkans and EU	

Purpose of the Evaluation

Following various discussions and adjustments in the planned budget for evaluation as well as the pre-determined timeframe for this evaluation, it was jointly decided with the EU DG NEAR⁴⁴ to conduct one mid-term evaluation with two components: one on the WBCSCi and the second on the EU action activities. Therefore, this will be a formative evaluation, including summative elements where applicable, to meet the needs of stakeholders. The evaluation will cover the WBCSCi/IISG pillar II – also in relation to the IISG at large - and include the IPA II (2017) Support to the WBIISG – the “action”.

Considering the scope of the WBCSCi and to ensure the needs of all stakeholders in the evaluation-process, further criteria were added to the ones stated in the EU action (Relevance and Process⁴⁵) based on consultation with the Management Team and Core Learning Partners – Effectiveness, Sustainability, Cooperation and Partnerships. Human Rights and Gender considerations will be fully mainstreamed throughout the evaluation-process and all criteria. Therefore, the following dimensions will be analysed in this independent mid-term evaluation to be complemented by detailed evaluation questions:

1. Assessment of the DESIGN⁴⁶ of the WBCSCi/IISG pillar II Governance mechanism, also in relation to the overall IISG concept. This assessment will also entail human rights and gender considerations, the related Results-Based-Management system and provisions as well as the role of the Western Balkans in the design;
2. RELEVANCE of the WBCSCi/IISG pillar II and of the EU action. The evaluation will address this through a focus on the, past and current needs of the beneficiaries, also considering related strategies of other relevant partners and the European Union as the action’s donor;
3. EFFECTIVENESS of the WBCSCi/IISG pillar II and linked to it of the EU action. The evaluation will address this in relation to outputs and short-term outcomes and an assessment of related theory of change/intervention logics, including the sphere of “process” in relation to contributing to the accession of the Beneficiaries to the EU;
4. SUSTAINABILITY of the WBCSCi and of the EU action. Specific focus should be paid to the potential for future engagement and ownership of the WBCSCi and the IISG at large;
5. COOPERATION and PARTNERSHIPS in relation to the level of cooperation and policy coordination under the WBCSCi/IISG pillar II as well as cross-pillar cooperation and coordination in the framework of the IISG;

⁴⁴ The funding agreement – as approved by the contracting authority, the European Commission – for the UNODC component in the IISG states that one mid-term evaluation will be conducted. (European Commission: Description of Action – Western Balkan Integrative Internal Security Governance (WBIISG) – UNODC component; 2017)

⁴⁵ P. 16; https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2017_039-402.09_mc_security_governance.pdf

⁴⁶ In order to allow a strong focus on the design of the Action and the WBCSCi, the criteria “Process” is subsumed under the criteria “Design” and “Effectiveness”.

6. LESSONS LEARNED as well as BEST PRACTICES from the first years of implementation of the WBCSCi/IISG pillar II to draw conclusions for the future direction of the WBCSCi and the IISG in general.

I. Scope of the Evaluation

Unit of analysis	WBCSCi/IISG pillar II, also in relation to the overall IISG, and including activities under the EC action IPA II (2017)-Support to the WBIISG
Time period of the project/programme covered by the evaluation	May 2016 ⁴⁷ (with a special focus on the start of the initiative since 2017) to end of field mission (tentatively October 2018)
Geographical coverage of the evaluation	Western Balkans

Key Evaluation Questions

The evaluation questions will be reviewed and further refined by the Evaluation Team in the Inception Report.

Design <i>The Design of an action/mechanism measures the extent to which the logical framework approach was adopted and used.</i>
1. To what extent are the results-based management mechanisms of the WBCSCi/IISG pillar II, also in relation to the overall IISG, in place to follow the progress and measure the results and achievements?
2. To what extent were different stakeholders involved in the design of the IISG/WBCSCi?
3. To what extent are gender equality and human rights considerations integrated in the design and implementation of the WBCSCi/IISG pillar II?
Relevance <i>Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient and donor.</i>
4. To what extent are the WBCSCi/IISG pillar II and the related EU action and their objectives aligned with the policies and strategies of beneficiaries, including those related to human rights and gender equality? To what extent is the IISG integrated into national level mechanisms?
5. To what extent is the WBCSCi/IISG pillar II and the related EU action, relevant to tackle the Western Balkans internal security threats, in particular relating to policy coordination?

⁴⁷ Considering the baseline for the coordination mechanism in the Western Balkans before the IISG, the evaluation will also include relevant information since May 2016.

6. To what extent are the WBCSCi's and the EU action intervention logics relevant to the beneficiaries needs?
<i>Effectiveness</i> <i>Effectiveness is a measure of the extent to which an aid activity attains its objectives.</i>
7. To what extent does the intervention logic/theory of change of the WBCSCi/IISG pillar II and the EU action consider the contribution to the accession of the Beneficiaries to the European Union, in particular relating to chapter 23 and 24 acquis?
8. To what extent were the planned short-term results achieved within the WBCSCi/IISG pillar II What were the contributing factors for achievement or non-achievement?
<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>
9. To what extent is the current set-up of the WBCSCi/IISG pillar II mechanism/structure and the EU action sustainable in the long-term, considering also the ownership of recipients? How can this be improved in the future?
<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, including related processes for cooperation.</i>
10. To what extent is the WBCSCi/IISG pillar II, in the context of the larger IISG, supporting policy coordination of beneficiaries and partners?
11. To what extent is the process for cooperation and partnership under the IISG, including inter-pillar with pillars I and III as well as intra-pillar, in place and appropriate?
<i>Lessons learned and best practices</i> <i>Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.</i>
12. What lessons can be learned from the initial set-up of the WBCSCi/IISG pillar II for the future development of the WBCSCi and the IISG at large?
13. What best practices, if any, can be identified from the implementation and set-up of the WBCSCi?

Evaluation Methodology

DEVELOPMENT OF THE EVALUATION TERMS OF REFERENCE

The Evaluations ToR are based on extensive consultations and engagement with the Management Group as well as Core Learning Partners⁴⁸.

In an initial stage, the UNODC IEU developed an evaluation approach paper based on extensive desk research and engagements with the EU DG NEAR, IISG Chair and Support Group to elaborate the role of evaluation in the overarching Monitoring and Evaluation Framework of the IISG/WBCSCi – in line with the provisions in the IPA II 2017 Multi-

⁴⁸ The Core Learning Partners can also be referred to as the “Evaluation Reference Group”.

Country Action “Support to Integrative Internal Security Governance in the Western Balkans” (IPA 2017/039-402.09/MC/SecurityGovernance).

Subsequently, the evaluation approach was presented to the second IISG Board Meeting (16 March 2018) as well as the Steering Committee of the Instrument for Pre-Accession Assistance (IPA) 2017 Countering Serious Crime Project (15 March 2018). The “IISG Board expressed support for the upcoming preparation of the IISG Monitoring and Evaluation framework, encouraging all IISG Partners and their own services to contribute to this task to enable this Board to conduct a quality monitoring and contribution to future implementation” (Second IISG Board Meeting minutes, 16 March 2018).

Subsequently, the IEU drafted the first Evaluation ToR and shared it with the Management Group for comments. Following individual discussions and feedback, a revised version was presented to the Management Group. Moreover, at this stage the Directorate General for Neighbourhood and Enlargement Negotiations, DG NEAR A 4 MFF, Programming and Evaluation was consulted, and their comments were incorporated in the revised draft ToR.

The subsequent final draft ToR was shared with CLPs for comments (2 weeks) and based on stakeholder feedback finalised and will be attached to the final evaluation report.

Based on the feedback received, the ToR were revised one more time and finalised.

METHODOLOGICAL APPROACH

Evaluations are carried out using social research methods and practices to measure what changes the programme, projects and policies have contributed to, and to obtain a mature understanding of how it happened. Evaluation aims at increasing knowledge of specific interventions for learning, informing decision-making processes, and being accountable to stakeholders, donors and citizens.

UNODC/IEU will evaluate the overall IISG initiative, with a particular focus on WBCSCi/IISG pillar II, including the EU-funded action “Support to the Western Balkan Integrative Internal Security Governance” under the Instrument for Pre-Accession Assistance (IPA II) 2014-2020. The independent formative⁴⁹ evaluation will encompass activities, outputs and outcomes included under the WBCSCi/IISG pillar II, in particular those funded by the EC action. The evaluation aims at drawing recommendations in relation to the overall IISG mechanism.

⁴⁹ Formative evaluations “provide the opportunity to determine what adjustments might be needed and to implement those changes within the intervention’s lifecycle” (UNODC Evaluation Handbook, p. 46). Furthermore, they are “intended to improve performance (...). They provide assessment and lessons learned (...).” (European Commission DG NEAR Guidelines on linking planning/programming, monitoring and evaluation, p. 97).

This independent evaluation will follow the United Nations Evaluation Group (UNEG) norms and standards⁵⁰, UNODC evaluation handbook⁵¹ as well as comply with the standards of the European Commission handbook: “DG NEAR – Guidelines on linking planning/programming, monitoring and evaluation”⁵².

The partners and recipients of the WBCSCi/IISG pillar II and the EC action will benefit from an evaluation approach that incorporates a pragmatic and sensitive institutional process while credible, independent and useful. The impartial and independent nature of the Independent Evaluation Unit in UNODC vis-a-vis the partners and implementers of the programme is a clear asset for this evaluation. UNODC/IEU will conduct this evaluation with a right mix of technical evaluation expertise applied to crime and drugs and flexible process to ensure ownership and utility of the results coming from the evaluation.

Confidentiality

The methodology includes strategies to engage all stakeholder groups, integrates gender equality and human rights principles, and has mechanisms to ensure confidentiality of sources. The anonymity and confidentiality of respondents is safeguarded throughout the evaluation process. Therefore, only the independent evaluators and IEU will participate in any data collection.

Participants who take part in the evaluation as informants, survey respondents or interviewees must receive assurance that their information will be treated confidentially. In addition, the report will not provide identifiable information, but findings will be reported anonymously, relating to group findings only.

The methods used to collect and analyse data

This evaluation will use methodologies and techniques as determined by the specific needs for information, the questions set out in the TOR and the availability of stakeholders. In all cases, the evaluation team is expected to analyse all relevant information sources, such as reports, programme documents, thematic programmes, internal review reports, programme files, evaluation reports (if available), financial reports (where necessary) and any other documents that may provide further evidence for triangulation, on which their conclusions will be based. The evaluation team is also expected to use interviews, surveys or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation. While maintaining independence, the evaluation will be carried

⁵⁰ <http://www.unevaluation.org/document/detail/1914>

⁵¹ http://www.unodc.org/documents/evaluation/Evaluation_Handbook_new/UNODC_Evaluation_Handbook.pdf

⁵² https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2016/20160831-dg-near-guidelines-on-linking-planning-programming-vol-1-v0.4.pdf

out based on a participatory approach⁵³, which seeks the views and assessments of all parties identified as the key stakeholders, the Core Learning Partners (CLP).

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

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

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

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

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

The main elements of this evaluation process are the following:

- Preliminary desk review of all relevant WBCSCi, IISG as well as EU action documentation, (Annex II of the evaluation ToR), as provided by the Management Team and as further requested by the evaluation team and IEU, as well as relevant external documents (e.g. EU local and regional strategies in the Western Balkans; UN and global/regional strategies; other relevant strategies and approaches in the region; reports, programme documents, thematic programmes/strategies, internal review reports, programme files, evaluation reports (if available), financial reports (where necessary) and any other documents);
- Reconnaissance mission of the evaluation team leader, senior expert and IEU to DCAF Ljubljana/IISG Chair, WBCSCi Lead Partners and EU DG NEAR during the Inception phase;

⁵³ During the Inception Phase the evaluation team will consider to what extent it can be conducted in a utilization focused manner.

- Preparation and submission of an Inception Report (containing preliminary findings/hypotheses 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 (except the reconnaissance mission) takes place;
- Initial meetings and interviews with the EU DG NEAR, IISG Chair, WBCSCi Lead Partners, implementers of the EC action and other relevant stakeholders and beneficiaries during the field mission;
- Interviews (face-to-face or by telephone/skype), with key stakeholders and beneficiaries⁵⁴, 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 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/normative-tools.html> as well as in line with the requirements of the European Union DG NEAR Guidelines on linking planning/programming, monitoring and evaluation⁵⁵). The evaluation team submits the draft report to the Management Team for the review of factual errors. Subsequently, IEU liaises with the Management Team and evaluation team to prepare a final draft report that will be shared with the CLPs for comments.
- Preparation of the final evaluation report and an Evaluation Brief (2-pager). The evaluation team incorporates the necessary and requested changes and finalises the evaluation report in accordance with the feedback received. It further includes a PowerPoint presentation on final evaluation findings and recommendations. UNODC/IEU is the sole clearing entity for this evaluation-process and all related deliverables.
- Presentation of final evaluation report with its findings and recommendations to the target audience, stakeholders etc. in the IISG Board Meeting in March 2019.
- In conducting the evaluation, the UNODC and UNEG Evaluation Norms and Standards as well as the DG NEAR Guidelines are to be considered. 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/normative-tools.html> as well as the DG NEAR website: <https://ec.europa.eu/neighbourhood->

⁵⁴ The key stakeholders for interviews, focus groups discussions, etc. will be identified by the management team and CLPs and will subsequently be further expanded by the independent evaluation team and IEU. This includes governmental counterparts, partners, trainees, trainers, other recipients, CSOs, etc.

⁵⁵ https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2016/20160831-dg-near-guidelines-on-linking-planning-progrming-vol-1-v-0.4.pdf

enlargement/sites/near/files/pdf/financial_assistance/phare/evaluation/2016/20160831-dg-near-guidelines-on-linking-planning-programming-vol-1-v-0.4.pdf

The sources of data

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

Desk Review

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

Phone interviews / face-to-face consultations

The evaluation team will conduct phone interviews / face-to-face consultations with identified individuals. The following is an initial list of groups of stakeholders. It should be noted that this is not an exhaustive list and will be further defined during the inception phase through a detailed stakeholder analysis:

- Recipient government;
- European Union;
- relevant international and regional organisations and other EU entities (including UNODC, GIZ, PCC SEE Chairmanship, CILC, RCC, Europol, EU Delegations, EUSR Kosovo* and EUSR BiH, SELEC, IOM, OSCE missions in WB countries, CEPOL, NI-CO, RACVIAC-SEE, DCAF, SEPCA Chairmanship, CoE, RAI, ICPO Interpol, UNDP, Italian Ministry of Interior, etc.);
- Relevant non-governmental organisations;
- Beneficiaries (including e.g. training participants, counterparts, etc.).

Questionnaire

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

TENTATIVE Timeframe and Deliverables:

<i>Duties</i>	<i>Time frame</i>	<i>Location</i>	<i>Deliverables</i>
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Reconnaissance mission to IISG SG	01 June 2018 (team leader; senior expert)	Ljubljana, Slovenia	Notes/key takings of the reconnaissance mission
Desk review and drafting of Inception Report	11 July – 17 August 2018 (evaluation team)	Home base	Draft Inception report in line with UNODC evaluation norms and standards ⁵⁶
Review of draft Inception Report by IEU	17 – 24 August 2018 (<i>1 week for IEU review</i>)		Comments on the draft Inception Report to the evaluation team
Incorporation of comments from IEU (can entail various rounds of comments from IEU)	27-31 August 2018 (evaluation team)	Home base	Revised draft Inception Report
Final Inception Report in line with UNODC evaluation norms, standards, guidelines and templates	By 31 August 2018 (evaluation team)		Final Inception report to be cleared by IEU at least one week before the field mission can get started
Evaluation mission: briefing, interviews (including by phone/skype); observation; focus groups;	03-28 September 2018 (evaluation team; planned: 10 working days for each team member) The evaluation team will be split	Ljubljana, Slovenia; Western Balkan countries (tbd) Brussels, Belgium	Interviews and data collection
Drafting of the evaluation report; submission to IEU;	01 to 19 October 2018 (evaluation team)	Home base	Draft evaluation report
Review of IEU for quality assurance	24-31 October 2018 (<i>1 week for review</i>)		Comments on the draft evaluation report to the evaluation team
Presentation of preliminary observations and discussions of initial findings and recommendations with Management Team	End October 2018 (date to be confirmed)	Brussels, Belgium, or skype conference	
Consideration and incorporation of comments from IEU; external evaluation quality assessment of the draft report	1-6 November 2018 (evaluation team)	Home base	Revised draft evaluation report
Draft Evaluation Report in line with UNODC evaluation norms, standards, guidelines and templates	By 09 November 2018 (evaluation team)		Draft evaluation report, to be cleared by IEU
IEU to share draft evaluation report with <i>Management Team</i> for comments	12-23 November 2018 (<i>2 weeks</i>)		Comments of CLPs on the draft report

⁵⁶ https://www.unodc.org/unodc/en/evaluation/normative-tools.html#Inception_Report

Consideration of comments from <i>Management Team</i> and preparation of draft Evaluation Brief	24 November - 28 November 2018 (evaluation team)	Home base	Revised draft evaluation report
IEU to share draft evaluation report with Core Learning Partners for comments	29 November - 13 December 2018		Comments of CLPs on the draft report
Final review by IEU; incorporation of comments and finalization of report and Evaluation Brief (can entail various rounds of comments from IEU)	17-21 December (evaluation team)	Home base	Revised draft evaluation report; draft Evaluation Brief
Final evaluation report; presentation of evaluation results; Evaluation Brief (2-pager)	By 31/12/2018 (evaluation team)		Final evaluation report; Evaluation Brief and presentation of evaluation results, both to be cleared by IEU
Presentation of evaluation results (to be reviewed and cleared by IEU)	Tentative: March 2019 (lead evaluator and senior expert)		Presentation of evaluation results
Informal workshop to action partners as well as IISG Chair, WBCSCi Lead Partners and other relevant stakeholders to increase utility of evaluation results	Tentative: March 2019 (lead evaluator and senior expert) and IEU		Workshop outline and report (2-pages)
Action management, IISG Chair and Lead Partners: Finalise Evaluation Follow-up Plan	By end March		Final Evaluation Follow-up Plan
Presentation of evaluation results; Workshop conducted	By 31/03/2019 (lead evaluator and senior expert)		Final presentation of evaluation results and workshop report, both to be cleared by IEU
EC DG NEAR, action management, IISG Chair: Disseminate final evaluation report	By 31/03/2019		Final evaluation report disseminated to internal and external stakeholders
IISG Board: Endorses final evaluation report	By 31/4/2019		Final evaluation report endorsed by the IISG Board

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

Evaluation Team Composition

Role	Number of consultants/ evaluators (national/international)	Specific expertise required⁵⁷
Team leader	1 international evaluation expert	Evaluation methodology and experience in assessing governance mechanisms
Team member – Senior expert	1 international senior expert	Expertise in RBM as well as extensive expertise in the Western Balkans and the EU accession mechanism; expertise in Gender Equality and Human Rights
Team member – two experts	2 international experts	Expertise in countering serious organised crime; experience in the Western Balkans; Expertise in Anti-Money Laundering or financial investigation/counter organised crime; expertise in Gender Equality and Human Rights
Evaluation managers	2 UNODC/IEU staff	Management and quality assurance of the evaluation process; participation in data collection as necessary; participation in follow-up activities; under the oversight and supervision of the Deputy/Chief of IEU.

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

Absence of Conflict of Interest

⁵⁷ Please add the specific technical expertise needed (e.g. expertise in anti-corruption; counter terrorism; etc.) – please note that at least one evaluation team member needs to have expertise in human rights and gender equality.

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

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

Management of the Evaluation Process

Roles and responsibilities of the Management Team⁵⁸

The Management Team consists of:

- EU DG NEAR D5 (Western Balkans and Regional Cooperation and Programmes)
- GIZ
- UNODC (also lead partner WBCSCi)
- CEPOL
- Europol
- IISG Chair
- IISG Support Group
- PCC SEE (lead partner WBCSCi)
- EU DG NEAR A4 MFF, Programming and Evaluation

The Management Team is responsible for:

- Providing input and finalizing the ToR,
- selecting Core Learning Partners (representing a balance of men, women and other marginalised groups), in consultation with IEU, and informing them of their role,
- providing desk review materials (including data and information on men, women and other marginalised groups) to the evaluation team including the full TOR,
- liaising with the Core Learning Partners (*not including substantial data and information collection, as this is done exclusively by the evaluation team and IEU*),
- reviewing the draft report for factual errors only,
- developing a follow-up plan for the usage of the evaluation results and recording of the implementation of the evaluation recommendations,
- disseminate the final evaluation report and communicate evaluation results to relevant stakeholders as well as facilitate the presentation of evaluation results;

The Management Team 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 in coordination with IEU (including travel details; DSA-payments; transportation; etc.)
- All logistical arrangement for the meetings/interviews/focus groups/etc., ensuring interview partners adequately represent men, women and other marginalised groups (including independent translator/interpreter if needed); set-up of

⁵⁸ The Management Team consists of: IISG Chair; IISG Support Group; Pillar II lead partners (PCC; UNODC)

- interview schedules; arrangement of ad-hoc meetings as requested by the evaluation team; transportation from/to the interview venues; scheduling sufficient time for the interviews (around 45 minutes); ensuring that members of the evaluation team and the respective interviewees are present during the interviews; etc.)
- All logistical arrangements for the presentation of the evaluation results and follow-up workshop;

Roles and responsibilities of the Core Learning Partners

The Core Learning Partners⁵⁹ consist of the following entities:

- Centre for International Legal Cooperation (CILC); Ministry of Interior Italy; Western Balkan Governmental Focal Points (one per country); Council of EU; MKD, Ministry of Interior; UNDP/SEESAC; UNDP; NI-CO; RAI; EU Delegation to BiH; OSCE; ICPO Interpol; ICMPD; Kosovo*; RS; Italy, Ministry of Interior; MNE, Ministry of Interior; BiH; MARRI; MNE, Ministry of Interior; CoE; RS; SELEC; Austria; MKD, Ministry of Interior; IOM; MKD, Ministry of Interior; CILC; OSCE Kosovo*.

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

Roles and responsibilities of the Independent Evaluation Unit

- Guidance, quality assurance, comments and clearing role throughout the evaluation-process;
- Close engagement with the Management Team and Core Learning Partners;
- the coordination for the evaluation ToR and proposing an independent evaluation team – in conjunction with the Management Team;
- reviewing, approving and contracting the evaluation team;
- liaising with the selected evaluators;
- overseeing the full data collection-process, including through participation in field missions;
- overseeing and guiding the development of the methodology;
- ensure the evaluation products meet EU and UNEG as well as UNODC 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;

⁵⁹ The CLPs are the main stakeholders, i.e. a limited number of those deemed as particularly relevant to be involved throughout the evaluation process, i.e. in reviewing and commenting on the TOR and the evaluation questions, reviewing and commenting on the draft evaluation report, as well as facilitating the dissemination and application of the results and other follow-up action. Stakeholders include all those to be invited to participate in the interviews and surveys, including the CLPs.

- safeguard the independence of the exercise;
- Engage with the evaluators and the Management Team regarding their comments on the draft report;
- guide, review and clear all steps in the evaluation process: Terms of Reference; Selection of evaluators; Inception Report (entailing the methodology); Field mission agendas; Draft Evaluation Report; Final Evaluation Report; Management Response/Follow-up plan.
- Ensure timely payment of the evaluation teams' fees, etc.
- Prepare follow-up meetings/workshops to foster learning based on the evaluation results.
-

Please find the respective tools on the IEU web site <http://www.unodc.org/unodc/en/evaluation/index>.

Payment Modalities

The evaluation team will be issued consultancy contracts and paid in accordance with UNODC rules and regulations. The contracts are legally binding documents in which the evaluation team agrees to complete the deliverables by the set deadlines. Payment is correlated to deliverables in line with the job descriptions in the annex.

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

IEU is the sole entity to request payments to be released in relation to evaluation.

ANNEX II. EVALUATION TOOLS

The following interview protocols for in-person or telephonic interviews were customised and adapted for each interview based on interviewee's role, time constraints, response, and level of knowledge/ familiarity with topics revealed during interviews. Note that all interviews started with informed consent. The interviewees were made aware that the information they provided would remain anonymous, how the information would be used and for what purpose, and they agreed to continue the interview.

Interviews at events:

1. How relevant is this event to you in your role? How relevant is the IISG to your work?
2. Are there aspects of how the event was developed that contributed to its relevance?
3. Does this event respond to current regional challenges in countering organised crime? Is the event building capacity in this area? What capacity?
4. Is the event likely to contribute to improved cooperation with other governments in countering serious organised crime? If not, how could this be achieved? If yes: could you give us one example of this improvement?
5. Does the programme have a visible focus on human rights and gender parity and capacity?
6. Is the event likely to contribute to long-term impact for you? Please provide details, or an example.
7. Have you seen best practice or lessons that can be learned in this event, that can be of value to other components of the programme?

Interviews on other field missions or over phone:

1. What is your role in connection with the WBCSCi/ IISG pillar II and EC action?
2. What type of cooperation/ interactions have had with the WBCSCi/ IISG pillar II and EC action?
3. How relevant are the projects in the WBCSCi/ IISG pillar II and EC action in terms of fulfilling the mandates of your organisation?
4. How relevant are the projects in terms of fulfilling commitments on human rights and gender equality issues?
5. To what extent do the programmes actually meet the needs identified in various project documents? How were these needs identified, was it an inclusive process that took into consideration HRG aspects?
6. To what extent do you consider the material and support provided by the WBCSCi useful to your work? How could it be improved?
7. To what extent do you consider the support provided by the WBCSCi useful to your work? How could it be improved?
8. To what extent do you work with staff from partner organisations and other providers of similar as WBCSCi?
9. Are all relevant partners included in the WBCSCi process?
10. How would you characterise your cooperation with partner organisations?

11. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
12. How would you characterise your cooperation with country counterparts? Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
13. What do you consider to be the main results that WBCSCi support helped you achieve?
14. How do you keep track of these outcomes and impacts?
15. Do you foresee any long-term impact of WBCSCi? Please describe.
16. What are the strengths and weaknesses of WBCSCi, compared to providers of similar?
17. How and to what extent do the projects incorporate human rights and gender dimensions? How satisfied are you with HRG related efforts? What could be done differently or significantly improved?
18. What are the internal and external factors that have facilitated and /or impeded achievement of these results? What steps have you undertaken to analyse, manage and mitigate risks?
19. How satisfied are you with projects monitoring and evaluation systems/indicators? What could be done differently or significantly improved?
20. How do the projects in WBCSCi/IISG pillar II coordinate their work across various IISG pillars?
21. Have you seen best practice or lessons that can be learned in this event, that can be of value to other components of the programme?

Survey Questionnaires for workshop and meeting participants

The questionnaire is available online by clicking [here](#).

ANNEX III. DESK REVIEW LIST

IISG Documents:

1. BRDO process 2017 IISG Kick off Conclusions, 7-8 Sept, 2017
2. 2nd IISG Board Meeting Conclusions, March 2018
3. DCAF Brief IISG
4. Article: IISG as a Challenge and as a model of regional cooperation, Oct 1, 2016
5. IISG one pager, Nov 17
6. IISG ToR, Sept 8, 2017
7. IISG IPA II 2014-2020, 2017
8. Policy Paper WB-IISG, Dec 6, 2016: Council Conclusions
9. RCC: Report on Gap Analysis on Regional Cooperation in the Area of Migration Management and Fight against Serious and Organised Crime
10. WBCSCi: Multi Country Strategy Paper, IPA II, Sept, 2014
11. Evaluation IPA II (2014-17), June 2017
12. IPA II Support to WB IISG
13. WBCSCI IPA 2018-2020 April 17, 2018
14. WBCTi IPA Final Report 2015-2017, March 2018
15. WBCTi IPA 2018-2019
16. Confidential documents (Available with IEU but not listed)
17. Agenda Interregional Conference Zagreb May 29, 2018
18. PCC SEE Meeting of Heads of Criminal Police: Security Challenges Related to Rising Migratory Flows, Serious and Organised Crime and Contribution to IISG Action, Tirana, Albania, 1-3 October 2018: Minutes with Conclusions.

General background documents:

19. EU Progress Reports, ALB, BIH, FYRM, MNE, XK, SRB 2016
20. EU Progress Reports, ALB, BIH, FYRM, MNE, XK, SRB 2018
21. DG NEAR, Guidelines on linking planning/programming, monitoring and evaluation. July 2016
22. WBCSCi Final Draft Evaluation Terms of Reference revised Aug 8, 2018
23. Six Flagship Initiatives; EU-Western Balkans, May 2018.

GIZ documents:

24. IPA/2017 Countering Serious Crime in the Western Balkans List of regional activities
25. IPA/2017 Countering Serious Crime in the Western Balkans List of activities by country
26. Annex I to the Delegation Agreement - CRIS No. [ENI/2015/038-739xxx] - Description of the Action - Countering Serious Crime in the Western Balkans
27. Countering Serious Crime in the Western Balkans – Logframe matrix

CEPOL documents:

28. 2017 Council of the EU: council conclusions on setting the EU's priorities for the fight against organised and serious international crime between 2018 and 2021
29. Cooperation Agreement between CEPOL and the Centre for Police Education of the Albanian State Police
30. Working Arrangement between the Ministry of Security of Bosnia and Herzegovina and CEPOL

31. Working Arrangement between the Ministry of the Interior of the Former Yugoslav Republic of Macedonia and CEPOL
32. EU Grant Agreement for Pillar Assessed Organisations (PA Grant Agreement) – defining the Financial Investigation In-Service Training Programme WB 2017-2019
33. Working Arrangement between the Kosovo* Academy for Public Safety and CEPOL
34. List of activities – national
35. List of activities - regional
36. A Cooperation Agreement between CEPOL and the Police Academy, Danilovgrad
37. November 2017 – Narrative Report for the CEPOL Exchange Programme (template)
38. Working Arrangement between CEPOL and the Ministry of Interior of the Republic of Serbia
39. CEPOL FI Project Stakeholder lists
40. CEPOL FI Project Templates
41. User Guide for the CEPOL Western Balkan Financial Investigation Exchange Programme

UNODC documents:

42. Western Balkan Internal Security Governance (WBIISG) UNODC Component - Description of the Action (and related documents)
43. UNODC Regional Programme for South Eastern Europe - Priorities for 2018: areas of intervention and partnership in the region - Adopted by the 9th meeting of the Programme Steering Committee - (16 February 2018)
44. Cumulative 2018 AML/CFT Work Plan - WB IISG Work Plan 2018 – UNODC Component
45. Western Balkans Integrative Internal Security Governance initiative (WB IISG) - WORK PLAN 2018 – UNITED NATIONS OFFICE ON DRUGS AND CRIME (UNODC) Component
46. UNODC/ CEPOL Project On Capacity Building On Financial Investigations In South Eastern Europe –
 - Questionnaire for the Pre Training Needs Analysis Joint
 - range of documents comprising the Pre Training Needs Analysis Environment Scan/ Desk Review
 - Training Needs Analysis documentation
 - Financial Investigation In-Service Training Programme Western Balkan 2017-2019 - INCEPTION REPORT
 - range of training documentation
 - Visibility documentation
 - range of coordination documentation
 - Reporting to the EU (2018)
 - Training feedback
47. Midterm In-Depth Evaluation: Global Programme For The Paris Pact Initiative Phase Iv – A Partnership To Combat Illicit Traffic In Opiates Originating In Afghanistan (Gloy09) February 2018
48. Final Mid-term Evaluation Report of Regional Programme for South Eastern Europe, March 2015
49. Inter-Regional Meeting between South Eastern Europe and West and Central Asia on Building Partnerships in Countering Illicit Financial Flows – Zagreb - June 2018 – Concept Note
50. UNODC evaluation guidelines etc.
51. A gender perspective on the impact of drug use, the drug trade, and drug-control regimes. UN Women Policy Brief. July 2014

52. Guidelines for Gender Sensitive Research. Prepared by Brigitte Leduc. ICIMOD. November 2009
53. Guidelines on Gender Mainstreaming in Alternative Development. UNDCP. 2000
54. UNODC-IEU Guidelines for UNODC Evaluation Reports
55. UNODC Evaluation report template: Independent project evaluation/In-depth evaluation of the Project/programme title
56. UNODC-IEU Guidelines for Inception Reports
57. UNODC-IEU Inception Report Template

ANNEX IV. LIST OF INTERVIEWEES

<i>Number of interviewees</i>	<i>Organisation</i>	<i>Type of stakeholder</i>	<i>Sex disaggregated data</i>	<i>Country</i>
6	UNODC	Partner	Male: 3 Female: 3	Austria
9	EU	Donor	Male: 7 Female: 2	Various
12	Ministries of Interior	Beneficiaries	Male: 10 Female: 2	Various
5	Ministries of Justice	Beneficiaries	Male: 5 Female: 0	Various
6	Police	Beneficiaries	Male: 4 Female: 2	Various
5	Prosecution	Beneficiaries	Male: 0 Female: 5	Various
2	Europol	Partner	Male: 2 Female: 0	Netherlands
2	Cepol	Partner	Male: 2 Female: 0	Hungary
2	EEAS	Partner	Male: 1 Female: 1	Various
3	DCAF incl. IISG	Evaluand	Male: 2 Female: 1	Slovenia
2	Frontex	Partner	Male: 0 Female: 2	Poland
1	GIZ	Donor	Male: 1 Female: 0	Germany
3	OSCE	Partner	Male: 1 Female: 2	Austria
5	Others	Partner	Male: 3 Female: 2	Various
Total: 63			Male: 41 Female: 22	

ANNEX V: REVISED EVALUATION QUESTIONS AND DATA COLLECTION STRATEGY

Evaluation Question	Indicator(s), data	Collection method(s): ⁶⁰ DR; I; O; S	Data sources: B ⁶¹ , LP ⁶² , P ⁶³ , O ⁶⁴ Rpts ⁶⁵ PPD ⁶⁶ OD ⁶⁷
Design			
1a. To what extent are the strategies and policies of WBCSCi/ IISG pillar II and EU action aligned with the issues identified in the gap analysis?	References to the Gap Analysis in programme and planning documents, reports, etc. Expressions by implementers as to their use of the gap analysis in planning of training programmes. Alignment of the initiative’s design and activities with regional policy documents.	DR I	PPD Rpts LP
1b. Are the priorities in the plan of action addressed in the design?	Clear relationship between defined priorities, strategies and actual activities. Visible consideration of priorities, policies,	DR I	PPD Rpts LP

⁶⁰ DR – Document review; I – Interviews; O – Observation; S - Survey

⁶¹ B – IISG Board. The IISG ToR define IISG Board composition at section 1.2.2.

⁶² LP – Lead Partners. Per the evaluation ToR, the defined LPs are the PCC SEE Secretariat and UNODC’s Regional Programme for South-Eastern Europe.

⁶³ P – Partners. Per the IISG ToR these are ‘All EU, international and regional actors who are contributing to the development and cooperation in the area of internal security in the Western Balkan region, and are, at the same time, supporting and contributing to the implementation of at least one activity in the framework of either of the IISG pillars and their respective Integrated Plans of Action (iPAs). The organisation hosting the IISG SG as well as all Lead Partners are also IISG Partners.’

⁶⁴ O – Observers. The IISG ToR defines ‘observer’ as ‘Any other actor interested in IISG implementation who does not qualify as Partner, and may be invited to the meetings of the IISG Board in the Observer role.’

⁶⁵ Rpts - WBCSCi reports.

⁶⁶ PPD - WBCSCi programme and planning documents.

⁶⁷ OD - Other documents.

	frameworks in both design and reporting.		
1c. To what extent were different stakeholders involved in the design of the IISG/ WBCSCi?	Types and numbers of stakeholder consultation events/ processes. Feedback from stakeholders/ beneficiaries of their involvement.	DR I S	LP P
2a. To what extent are the results-based management mechanisms in place to identify and measure progress in achieving outcomes and impacts?	Clear logframe following RBM principles defining activities and results. Related well-defined indicators. Visibility in programme and planning documents and reports of these components and their use in planning and reporting. Presence of systems/ approaches to monitoring, including their use of the logframe and included indicators. Extent of the facility and ease of discussion of planning and reporting processes from LP and management in the context of results-based management approaches.	DR I	PPD Rpts LP
2b. Are risks being specifically identified and addressed?	Visible risk analysis in programme documents. Visible reporting on risks and risk mitigation approaches in reports.	DR I	PPD Rpts
3. To what extent are human rights and gender equality considerations integrated in the design of the WBCSCi/IISG pillar II, including the EU action?	Visibility in programme and planning documents and reports. Presence in discussion and interviews.	DR I O	PPD Rpts B LP P
Relevance			
4. To what extent are the WBCSCi/IISG pillar II and the related EU action embedded in national level mechanisms, policies and strategies of beneficiaries, including those related to human rights and gender equality?	References in programme documentation and reports of existing partner strategies and policies. Feedback from both lead partners and partners indicating awareness and consideration of	DR I S	PPD Rpts LP P

	existing policies and strategies.			
	5. To what extent are the WBCSCi/IISG pillar II and the related EU action relevant to tackling Western Balkans internal security threats?	Correlation between the activities of WBCSCi and policy coordination approaches.	DR I	PPD Rpts LP P
	Effectiveness			
	6a. To what extent does WBCSCi/IISG pillar II and the EU action contribute to the accession of Beneficiaries to the European Union, in particular relating to chapter 23 and 24 acquis? What were the contributing factors for achievement or non-achievement?	Extent to which the priorities of Chapters 23 and 24 are visible in programme documentation and reports. Extent to which the WBCSCi and the EU action are assisting partners in fulfilling obligations of Chapters 23 and 24.	DR I	PPD Rpts LP P O
	6b. To what extent is WBCSCi/IISG pillar II addressing human rights and gender equality?	Presence in training materials and agendas. Policies and mechanisms in place that directly address human rights and gender equality. Presence in the monitoring system (is data being collected and used in modifications to activities).	DR I	PPD Rpts OD B LP • P
	Efficiency			
	8. To what extent is the IISG pillar II/WBCSCi and the EU action, efficient in pursuing stated objectives and outcomes? Are there any significant opportunities to improve efficiency and reduce risks?	Degree of duplication. Visible approaches to ensuring coordinated efforts.	DR I	PPD Rpts LP P O
	Impact and sustainability			
	7. Is it likely that the WBCSCi/IISG pillar II, and the EU action, will contribute to a reduction in serious organised crime?	The achievement of planned outcomes, as proxy indicator of potential for longer term change. Degree of institutional change	DR I	PPD Rpts OD B LP P
	9. To what extent is the WBCSCi/IISG pillar II and the EU action sustainable?	Extent to which sustainability is considered in the design of interventions. Frameworks within public service arrangements that state or imply a longer term engagement in WBCSCi activities. Funding commitments to either WBCSCi activities or related,	DR I O	Rpts B LP P

	internal security initiatives of the Partner. Examples of Partner ownership of initiatives.		
Partnerships and cooperation			
10. To what extent is the WBCSCi, in the context of the larger IISG and including the EU action, supporting policy coordination of beneficiaries and partners?	Visible linkages in national action and policy documents. Linkages and references in programme and planning documents to national strategies, policies and action documents. Linkages and references in programme and planning documents to EU strategies, policies and action documents. References in reports to how linkages with national and EU strategies, policies and action plans are actually being formulated and implemented.	DR I	PPD Rpts LP P
11. Is the process for inter-pillar and intra-pillar cooperation and partnership in place and appropriate? To what extent have all relevant partners been included?	Examples of Partner and Observer involvement in governance mechanisms. Mechanisms in place for substantive feedback from Partners or Lead Partners regarding engagement of Partners and Observers in governance mechanisms. Composition of the Board. Involvement in Board and other governance meetings.	DR I O	Rpts LP P
Lessons learned and best practice			
12. What lessons and best practices can be identified from the set-up and implementation of the WBCSCi, in the context of the larger IISG and including the EU action?			

ANNEX VI. EVENTS OBSERVED

#	Date	Event	Location
1	6/28-6/29	Inter-Regional Meeting between South Eastern Europe and West and Central Asia on Building Partnerships in Countering Illicit Financial Flows	Zagreb
2	9/04-9/07	1st FI training – (in the jurisdictions)	Belgrade
3	9/05-9/06	Workshop Enhancing Cooperation with the Western Balkans	Belgrade
4	9/18-9/21	1st FI training – (in the jurisdictions)	Albania
5	9/24-10/03	Common Police operation at the Albania/Montenegro border. DCAF implementation	Albania/Montenegro
6	10/01-10/03	PCC SEE Meeting of Heads of Criminal Police: Security Challenges	Tirana, Albania
7	10/03-10/04	UNODC-OSCE event: regional platform for exchange of information on illicit financial flows	BiH
8	10/08-10/12	Financial investigations in relation to drug trafficking.	Kosovo*
9	10/08-10/12	Advanced training on freezing, restraining and confiscating criminal assets	Kosovo*
10	10/16-10/19	2nd training – adult learning methodology	BiH and Former Yugoslav Republic of Macedonia

ANNEX VII. OPERATING COSTS FOR THE IISG MECHANISM: A DETAILED BREAKDOWN

Purpose (Dates): Notes	Costs
GIZ/IPAII2017 Multi-Country Action:	
IISG Level Coordination (04/2018-09/2018): Stakeholder and/or beneficiary coordination meetings on IISG level	3,213
IISG Level Coordination (04/2018-09/2018): Bilateral IISG and stakeholder meetings	2,479
IISG Visibility activities (04/2018-09/2018): Includes IISG high-level panel discussion at Bled Strategic Forum, Slovenia	3,663
IISG Promotion activities (09/2017-09/2018): Printing of promotional materials, pens, notebooks, notepads, infographics, reports, promo USB sticks	5,392
IISG EU-WB Policy Cycle Workshop, Belgrade, Serbia (09/2018): GIZ paid for the entire activity directly from IPAII2017	7,116
1st WBCSCi Coordination Meeting, Jable, Slovenia (11/2017): GIZ co-financed the activity directly from IPAII2017	8,827
IPA II 2016 Multi-Country Action:	
Accounting services - part-time engagement of company ACONTO, Slovenia (09/2017-09/2018)	19,520
Consultancy Service (IISG Support Group member: 09/2018): Engagement of one IISG Support Group member	2,470
GMC-WBCTi conference for the WBCTi iPA 2018-2020 preparation (05/2017): Co-organised with George C. Marshall Center and MoI Slovenia back-to-back to rationalise costs and prevent duplication of contents. Their costs cannot be presented here.	9,603
Missions/travels (EU and WB6, 04/2017-09/2018): Coordination, bilateral meetings, relevant participation at external events, promotion, needs assessment for the WBCTi, WBCSCi iPAs	23,350
Salaries IISG Chair, IISG assistant, logistics officer, staff assisting on part-time basis (partial salaries, 09/2017-09/2018)	329,482
Overheads (09/2017-09/2018): running costs, publications, other promotional or visibility materials	104,840
Visibility actions (09/2017-09/2018): Includes website establishment and management, upgrades	33,182
IISG ministerial Board meetings, Brdo at Kranj, Slovenia (09/ 2017 & 03/2018): These two events were co-organised with MoI Slovenia and PCC SEE (and GIZ in case of March 2018) back-to-back in order to rationalise costs. Their costs are not presented here.	46,451
DCAF:	
Salary IISG Senior Advisor (09/2017-09/2018)	54,252
PCC SEE Secretariat (core funding):	
1st WBCSCi Coordination Meeting, Jable, Slovenia (11/2017)	4,455
TOTAL	658,295

**** IPAII2017 M-C Action "Support to IISG", whereof one strand is granted to GIZ**

ANNEX VIII. TERMS OF REFERENCE FOR THE IISG



Integrative Internal Security Governance (IISG) in the Western Balkans

Terms of Reference

8 September 2017

VOCABULARY

Western Balkan Counter-Terrorism Initiative (WBCTi)	An initiative originating from the Slovenian-led Brdo Process regional ministerial framework and proposed at the EU level by Slovenia in mid-2014, introducing an integrative, complementary approach to all external (incl. EU) assistance provided to Western Balkan countries' authorities in the area of preventing and countering radicalization leading to violent extremism and counter-terrorism. The WBCTi was the first pillar of the Integrative Internal Security Governance Concept (IISG) to be introduced and was developed into a multi-annual Integrative Plan of Action (iPA) in late 2014.
Integrative Internal Security Governance (IISG)	A policy-level concept, addressing the internal security of the Western Balkan region, whose introduction at the EU level came only after the WBCTi already begun to be implemented, in mid-2016.
Western Balkan Counter-Serious Crime initiative (WBCSCi)	The second pillar of the IISG, addressing the needs of the Western Balkan countries and their authorities to counter Serious and Organised Crime.
Western Balkan Border Security initiative (WBBSi)	The third pillar of the IISG, addressing the needs of the Western Balkan countries and their authorities to counter threats to border security and integrity.
Integrated Plan of Action (iPA)	Multi-annual action plan in either of the respective IISG pillars, joining the activities of those actors who wish to have their efforts and/or investments subjected to wider coordination of external assistance in the particular IISG field; to benefit from IISG guidance and to benefit from the mechanisms IISG offers to ensure rationality and long-term sustainability.

IISG Support Group (IISG SG)	The IISG coordination structure, foreseen in the Council Conclusions on IISG ¹ ; an independent technical body established to support the implementation of the IISG, based on existing regional mechanisms and organisational arrangements; it is chaired by the IISG Chair.
IISG Chair	An informal function assigned with the support of the relevant services of the European Commission to a representative of an IISG Partner with a visible role in IISG implementation. This function is assigned for the duration of the IISG implementation process. His/Her appointment is endorsed by the IISG Board.
IISG Board	A regional high-level committee with a programming, coordinative, monitoring and evaluating function; a political-level body governing the IISG implementation process, whose comprehensive membership and high-level participation aim for the achievement of transparency, efficiency and sustainability of implementation.
Lead Partners	Actors with assigned leading coordinative roles in the implementation of the respective IISG pillars.
IISG Partners	All EU, international and regional actors who are contributing to the development and cooperation in the area of internal security in the Western Balkan region, and are, at the same time, supporting and contributing to the implementation of at least one activity in the framework of either of the IISG pillars and their respective Integrated Plans of Action (iPAs). The organisation hosting the IISG SG as well as all Lead Partners are also IISG Partners.
Observer	Any other actor interested in IISG implementation who does not qualify as Partner, and may be invited to the meetings of the IISG Board in the Observer role.

PURPOSE

The integrative and complementary approach in the prevention of violent extremism and countering terrorism in the Western Balkans was applied in late 2015 at the EU level with the formal adoption of the “Council Conclusions on the Integrative and complementary approach to counter-terrorism and violent extremism in the Western Balkans” by the Justice and Home Affairs (JHA) Ministerial Council on 4 December 2015. As the implementation of the Western Balkan Counter-Terrorism Initiative (WBCTi) continued, the EU Member States supported the extension of this model approach to two other areas of internal security, namely border security and countering serious and organised crime. The concept of Integrative Internal Security Governance (IISG) in the Western Balkans was developed and formally introduced at the EU level with the adoption of the “Council Conclusions on IISG²” of 8 December 2016, also by the JHA Council of the EU and supported by the ministers of the Western Balkan Region at the EU–Western Balkans JHA Forum in December 2016.

The IISG constitutes a policy-level approach that aims to assist the Western Balkan countries in internal security development in a coordinated and functionally integrated manner – in that it not only coordinates the efforts and investments from external (incl. EU) assistance, but also integrates relevant regional or other instruments and tools to improve their functionality and long-term sustainability.

The Council Conclusions also mention the »setting-up of a coordination mechanism – the Integrative Internal Security Governance Support Group (IISG SG) for the Western Balkans«, its tasks and composition; and it outlines the role of a relevant high-level forum as the political body governing the IISG mechanism – the IISG Board, and lays down the three-pillar structure of the IISG implementation mechanism.

This document lays down the Terms of Reference related to the IISG implementation and the operation of the IISG supporting bodies. It is submitted to the members of the IISG Board for endorsement.

This document also serves as guidance to the implementation process of the IISG in the Western Balkans, especially for the model of cooperation supported by the IISG Chair, the IISG Support Group, IISG Board and the IISG network of partners, which aim to provide long-term sustainable cooperation, coordination and optimal sustainability of implemented actions.

TITLE I – IISG SUPPORTING STRUCTURE

1.1 IISG Support Group

1.1.1 Composition

The IISG Support Group (IISG SG) membership includes:

- IISG Chair / Chair of the IISG SG
- Lead Partners – representatives of actors assuming the roles of Lead Partners in respective IISG pillars;
- Other members appointed by any IISG Partner offering support to the work of the IISG SG.

An IISG SG member can be appointed to the IISG SG either by being posted to the hosting organisation or by remaining situated at his home organisation while executing their IISG tasks as a part of his/her daily workload.

1.1.2. Tasks

The IISG Support Group (IISG SG) is tasked with the following:

- coordination, monitoring and evaluation, risk management, promotion and ensuring sustainability of internal security reforms implemented via the IISG in the Western Balkans and via the IISG pillars;
- executing an advisory role toward all IISG Partners, and ensuring a high level of transparency toward all Partners related to all aspects of its operation;
- consistent and systematic inter-pillar coordination, involving constant communication between the members. Inter-pillar coordination is thus a shared responsibility of the IISG SG Chair and all IISG SG members. It is to be conducted based on quality outputs of intra-pillar coordination, via mutual communication and constant exchange of information;
- ensuring that any internal security issue, including a hybrid threat and/or horizontal gap, is appropriately addressed within the IISG - by ensuring an integrative approach balancing issues and subsequent actions under the competence of a single IISG pillar with those issues and subsequent actions that are horizontal and cross-cutting and bear relevance to two or more IISG pillars;
- consulting and contributing to the updating of the IISG online database of ongoing and planned activities in the Western Balkan region, incl. proposing any necessary procedural updates or changes to the Partner in charge of the management, upgrades and administration of the IISG online database.

Based on its specific mandate related to the coordination of regional cooperation, the Regional Cooperation Council (RCC) Sarajevo is regularly involved in the work of the IISG SG. It may assist the IISG SG in ensuring consistency with existing and/or planned regional cooperation mechanisms and initiatives relating to the objectives of each IISG pillar.

All IISG Partners will contribute to the monitoring and evaluation tasks of the IISG SG, as related to their respective activities included in the iPA, including the planning, preparation and execution of the IISG monitoring & evaluation framework.

1.1.3. IISG Chair

The IISG Chair operates out of the hosting organisation of the IISG Support Group (IISG SG). He/She performs his/her tasks independently and in the interest of all IISG Partners. The IISG Chair also serves as Chair of the IISG SG.

The tasks and responsibilities of the IISG Chair:

- acting as the main interlocutor and representing the IISG at the EU, regional and international level;
- ensuring a transparent and open external communication on behalf of the IISG, and being in charge of IISG external promotion and IISG-related policy advocacy;
- preparation of any IISG strategic documents to guide the implementation; he/she is responsible for the preparation of any project proposals related to IISG implementation, with the assistance of other IISG SG members;
- ensuring transparent and timely communication and reporting on IISG implementation required to fulfill any formal requirements of the existing financial framework(s) or general donor requirements regarding IISG implementation;
- defining the procedures for information exchange and communication between the IISG SG members, incl. regular IISG SG coordination meetings;
- regular reporting to the IISG Board and giving approval to written reports and other pieces of external communication as prepared by the IISG SG, incl. written documents to be submitted to the IISG Board;
- assigning tasks to other IISG SG members;
- supporting the work of Lead Partners directed toward the achievement of pillar objectives and helping to ensure sufficient and coordinated funding for implementation.

The IISG Chair also appoints the IISG Senior Advisor from within the IISG Partnership. The latter's responsibilities are to support the work of the IISG Chair, to replace him/her in cases of absence, and to execute other relevant tasks in accordance with authorisation given by the IISG Chair. The IISG Senior Advisor is based at the IISG SG hosting organisation.

1.1.4. IISG Hosting Organisation

The IISG Support Group (IISG SG) is hosted by the regional office of the Geneva Centre for the Democratic Control of Armed Forces (DCAF) in Ljubljana (DCAF Ljubljana). DCAF Ljubljana supports the work and operation of the IISG SG, incl. by offering its premises and/or other amenities to IISG SG members, and its relevant expertise. IISG SG members can be posted at DCAF Ljubljana, based on a previous agreement between DCAF Ljubljana and the sending organisation. The administrative and financial procedures for all IISG SG members posted at DCAF Ljubljana are subject to DCAF Rules and Regulations, and are agreed in advance between the IISG Chair, the sending organisation and DCAF. While posted at the hosting organisation, IISG SG members execute their tasks independently and in the interest of all IISG Partners.

Staff of the hosting organisation additionally supports the work of the IISG SG, including tasks related to logistics and administration, or relevant expertise. The modalities of their engagement are agreed in advance between the IISG Chair and the head of the hosting organisation.

1.1.5. Responsibilities of IISG Support Group members

The following responsibilities are delegated upon the IISG SG members:

- executing tasks assigned to them by the IISG Chair that are intended to support the work of the IISG SG;
- attending IISG SG coordination meetings convened by the IISG Chair – executed either online or at the same venue if possible;
- providing regular assistance to the IISG Chair by providing timely reports on the progress, gaps and other issues on implementing activities within each pillar;
- bringing to the attention of the IISG Chair and the IISG Senior Advisor all matters concerning gaps, potential duplications or requests for assistance on part of any IISG Partner contributing or planning to contribute to their respective IISG pillar;
- participating in IISG SG coordination meetings convened by the IISG Chair or the IISG Senior Advisor. In cases of their urgent absence, Lead Partners can assign a person of appropriate position and capacity to serve as replacement.

1.2 IISG BOARD

The IISG Board is a regional high-level committee with a programming, coordinative, monitoring and evaluating function. It is a high-level political body governing the IISG implementation process.

The IISG Board convenes at the level of interior/security ministers. Its meetings are hosted by/adjoined to an existing regional framework with appropriate level of legitimacy

and regional ownership, whose membership and/or participation is open to relevant EU entities, regional and international actors, and to other relevant organisations.

The IISG Board convenes at least once per year. Regular meetings of the IISG Board take place on the margins or back-to-back to high-level meetings of the designated hosting regional framework.

The minister convening the hosting regional framework, i.e. the official host of the IISG Board meetings, may present IISG positions and meeting conclusions in international ministerial or other high-level meetings, in coordination with the IISG SG. He/She participates in IISG Board meetings.

IISG Board meetings are chaired by the European Commission, and co-chaired by the Presidency of the Council of the EU and the European External Action Service (EEAS). The IISG Chair/IISG SG Chair provides support to the chair and co-chairs.

1.2.1. Tasks and responsibilities

The IISG Board provides political guidance and backing to the IISG implementation process and provides political visibility. It monitors and evaluates progress in the IISG implementation process. The IISG Board provides political guidance on the internal security of the Western Balkans, threats, challenges and operational response.

In order to achieve these tasks, the IISG Board:

- a) takes note of the progress and regularly evaluates the results of IISG implementation;
- b) endorses the appointment of the IISG Chair based on a proposal on part of the IISG Board Chairmanship;
- c) takes note of the overview of the current funding arrangements for the implementation of all IISG- related activities;
- d) it invites Lead Partners and Partners in each IISG pillar to implement the iPAs, and recommends to all relevant actors in the area of internal security in the Western Balkans to consider the relevant iPA as a politically binding document before entering into the planning or supporting any new activity or initiative targeting Western Balkan internal security;
- e) endorses on a regular basis written reports prepared by the IISG SG that reflect the progress in the implementation of all IISG pillars;
- f) based on a proposal of the IISG SG, recommends actions to enhance the efficiency and sustainability of activities implemented in the area of internal security in the Western Balkans;
- g) takes note of relevant contributions of IISG Partners relating to their own work in implementing activities within the respective IISG pillars;
- h) endorses relevant IISG positions and contributions prepared by the IISG SG;
- i) draws written meeting conclusions;

- j) is responsible for the coordination of operational priorities as they are to be followed by the IISG implementation process;
- k) endorses sets of priorities for the IISG implementation within each respective IISG pillar, for each subsequent multi-annual period, as well as any relevant strategic documents, while taking into account operational priorities of the EU Policy Cycle;
- l) takes note of relevant risk and threat assessment reports related to Western Balkan internal security;
- m) provides opinions on matters related to Western Balkan internal security and IISG implementation;
- n) endorses reports and other documents prepared by the IISG SG to be presented in other relevant international fora;
- o) draws other relevant conclusions.

The IISG Board meeting documents and written meeting conclusions are prepared by the IISG SG. The IISG Board decides based on consensus.

When the attention of another relevant forum is required to efficiently address a particular issue as identified by the IISG SG, the IISG Chair may request the chairmanship of that forum to place the issue on the meeting agenda at an appropriate level.

1.2.2. Composition

The IISG Board membership is open to all IISG Partners and Observers. The IISG Board membership includes:

- ministers responsible for home affairs/security of Western Balkan countries/Beneficiaries;
- high-level representatives of the Presidency of the Council of the EU, the European Commission, the European External Action Service (EEAS), EU Counter-Terrorism Coordinator (EU CTC) and executive directors of relevant EU agencies;
- high-level representatives of IISG Lead Partners;
- high-level representatives of the leadership of regional initiatives and international actors;
- ministers responsible for home affairs/security of interested EU Member States;
- high-level representatives of IISG Observers.

1.2.3. Meeting Formats

The IISG Board may be convened in two formats:

- a) Core Format (IISG Core Board), which consists of ministers responsible for home affairs/security of the Western Balkan countries and the IISG Board

Chairmanship. The IISG Core Board functions in an advisory role in the IISG implementation process. The Core Format meetings may also be convened as irregular meetings by the IISG Chair in case of urgent order of business related to the internal security situation and dealing with occurring challenges with implications for the security of the Western Balkan region, and in order to form an efficient operational response and take other, strategic decisions related to regional internal security. The Core Board endorses draft document proposals prepared by the IISG SG, draft reports and other IISG documents, which are later taken note of by the Extended IISG Board;

- b) Extended Format of the IISG Board, where all other IISG Partners are invited.

Any irregular meetings may also be held either independently, or adjoined to/back-to-back with meetings of regional frameworks other than the designated hosting regional framework when necessary.

IISG Observers may be invited to IISG Board meetings.

Any IISG Partner who actively contributes to the implementation of an iPA may appoint a standing member to the IISG Board of an appropriate level and capacity, as well as his/her replacement in cases of urgent absence, to attend IISG Board meetings. The IISG SG is to be informed of such an appointment.

1.3 IISG PILLAR STRUCTURE AND ROLES

The IISG pillar structure comprises of the following pillars:

- i. Western Balkan Counter-Terrorism initiative (WBCTi)
- ii. Western Balkan Counter-Serious Crime initiative (WBCSCi)
- iii. Western Balkan Border Security initiative (WBBSi)

Each pillar is implemented based on a multi-annual Integrated Plan of Action (iPA). The preparation, planning and implementation of activities of each iPA are the main task of the Lead Partner.

1.3.1. Lead Partners

The Lead Partner(s) within a respective IISG pillar has the following tasks and responsibilities:

- the preparation of the integrated Plan of Action (iPA), whereby they are obliged to submit a final draft, after obtaining approval of the IISG Chair, to the IISG Board for endorsement;
- constant and consistent intra-pillar coordination within their respective IISG pillar

- in close cooperation with all Partners;
- overseeing implementation and ensuring that the goals realised by the activities of their iPA are in-line with the overarching IISG objectives;
 - regular communication with all Partners in implementing the respective Integrated Plan of Action (IPA), familiarises themselves with progress, identifies together with Partners possible gaps in implementation and outlines solutions how to prevent any possible duplications of efforts;
 - participating in the monitoring and evaluation within their respective pillar and contributing to the objectives of the IISG monitoring & evaluation framework;
 - preparation of reports and other written information as requested by the IISG Chair or IISG Board;
 - providing the IISG SG with recommendations and proposals regarding the enhancing of efficient IISG implementation, doing away with any gaps in implementation, preventing possible duplication, seeking synergy, and other relevant developments.

1.3.2. IISG Partners

IISG Partners are required, in their role as (co-)implementers, to ensure correct and transparent implementation of all their activities/series of activities that are included in a particular iPA in order to enable the IISG SG to comply with its responsibilities of reporting. This is also the case with financial implementation and reporting, regardless of who may be the (Co-)Applicant for the funding of a particular activity/series of activities. IISG Partners are obliged to report to the IISG Support Group and/or the Lead Partner(s) after the conclusion of each activity under their (co-)organisation.

1.3.3. Preparation of the Integrated Plan of Action (iPA)

The preparation of the draft Integrated Plan of Action (iPA) is the responsibility of the Lead Partner(s) in the respective IISG pillar. The preparation of each iPA is a joint process, involving the Lead Partner(s) as well as all Partners and relevant Observers. The Lead Partner is in charge of ensuring full transparency and quality during each phase of iPA preparation, i.e. the Beneficiaries and all Partners are to be familiarised with the outputs of each phase of iPA preparation.

Each iPA is to be prepared for an implementation period of at least 2 years. Each iPA is a living document to be updated when necessary on part of the Lead Partner.

The preparation is to be initiated by the Lead Partner(s) at least 6 months before entering into force, by submitting a proposed full timeline of the preparation process to the IISG in written form.

Each Lead Partner is responsible to apply the common methodology and structure to each IISG pillar described in the section below, which is largely based on the experience gathered during the preparation and implementation of the WBCTi iPA 2015-2017.

1.3.4 iPA Methodology

The guiding elements of the iPA methodology, presented according to phases:

i. Needs assessment

- The Lead Partner convenes coordination meetings intended for the transparent needs assessment required for the preparation of each subsequent iPA under their pillar. Any iPA can be based on relevant and appropriate needs assessments conducted by the Lead Partner(s) and Partners.
- The needs are acquired using the combination of bottom-up and top-down approaches. The needs are acquired via involving all relevant levels representing the Beneficiaries and Partners, including expert level and senior management level. The IISG Board and, where relevant, other ministerial formats, are to be consulted anytime during the needs assessment phase.
- For the sake of optimal efficiency during the acquisition of needs, the Lead Partner is encouraged to also consider the input from any other external relevant events related to internal security in the Western Balkan region to acquire regional needs, including the input provided by any intelligence-led policing mechanisms as they develop under the IISG framework and also take into account priorities of the EU Policy cycle.
- Due diligence regarding the iPA needs assessment requires sufficient time, a number of bilateral consultations and regional events intended primarily for Beneficiaries represented at above mentioned levels.
- Several groups of needs are thus obtained and may already include proposals from Partners and Observers on their prioritisation. They also include an EU perspective of regional challenges and of security threats to the EU. Therefore, the needs are to be sought for by the following categories: (1) Beneficiaries' political-level priorities endorsed at political level (»top-down« approach); (2) input from expert-level representatives of the Beneficiaries (»bottom-up« approach); and (3) input acquired from EU, the United Nations (UN) and other IISG Partners.
- At the next stage, the Lead Partner combines the needs according to contents and any proposals for priorities he had acquired so far, and translates them into individual iPA objectives and foreseen actions.

ii. Prioritization

- To ensure efficient planning and implementation, the objectives and ensuing actions are to be considered according to the following criteria: (1) those which will offer a

result in the short-term; (2) those which are addressing the root causes of a problem and/or are of strategic importance and are thus expected to bear positive long-term impact; and (3) those that offer a response to threats estimated as most significant to the internal security of the Western Balkan region and to European security as a whole.

- Prioritization also takes into account the following two parameters: (1) existing level of interest on part of Partners to take the lead in an action addressing an objective; and (2) funding available to conduct a certain action that will avoid the lack of implementation.

iii. Planning

- All IISG activities/sets of activities are to be planned in order to ensure maximum efficiency, rationality in terms of all kinds of resources utilised, as well as long-term sustainability.
- After setting the commonly identified priorities, the Lead Partner is to assign realistic timelines to each action and to indicate foreseen financial costs.
- An estimated level of impact (H-high, M-medium and L-low) is also to be assigned to each action.
- The Lead Partner takes into consideration any co-financing (or financing in full) available or foreseen for any iPA action from an external source or a Partner's own budget.
- In case when an activity/set of activities from the preceding iPA could not be concluded before its expiry, they are to be fully considered in the iPA preparation process, including the parameters that will ensure sustainability and full implementation of this activity/set of activities.

iv. Securing endorsement

- During the preparation of each final draft, the European Commission is regularly consulted by the IISG Chair.

The structure of the iPA is to be approved by the IISG Chair.

1.4 IISG TOOLS AND VISIBILITY

1.4.1. Network of contacts

A crucial element of successful IISG implementation is an efficient network of contacts. Each IISG partner will designate its point(s)-of-contact for IISG implementation and inform the IISG Support Group of any subsequent changes in a timely manner. The IISG Support Group (IISG SG) interlocutors – IISG Lead Partners and supporting officials – will make

their contacts known to all IISG partners. The network of contacts established within each IISG pillar will further support the efficient work and close cooperation.

1.4.2. IISG database of donor activities

All IISG partners receive access to the IISG on-line database of activities, intended to record any relevant activity in the area of internal security in the Western Balkans. The IISG SG is responsible to ensure maintenance and regular updating of the on-line database in cooperation with relevant IISG Partners.

1.4.3. IISG website

The IISG website registered at the web domain www.wb-iisg.com is to be prepared and updated by DCAF Ljubljana, in cooperation with the IISG SG.

1.4.4. Access to IISG documents online

The IISG website will enable appointed representatives of the IISG SG and Board members to access documents and relevant materials.

1.4.5. IISG unified image

In order to emphasise the unified IISG vision and to increase the visibility of the IISG, the IISG Chair and the IISG Support Group will utilise a common logo and document templates. Logos of donors will be reflected in the templates in accordance with any relevant existing rules or requirements