

MID TERM EVALUATION

Final Report

Project number

GLOU40 (GLOB79 until 31st March 2008)

Project title

Global Programme against Money Laundering, Proceeds of Crime and the
Financing of Terrorism (GPML)

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I. EXECUTIVE SUMMARY

The predecessor of the Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) was originally established in 1997 with an anti-money laundering (AML) focus and was first evaluated in 2004. In 2008 the programme was revised to also include a countering the financing of terrorism (CFT) component and a new logical framework was drafted, with the following overall objective: “*Assisted States build effective legal, regulatory and law enforcement capacity in compliance with anti-money laundering/countering the financing of terrorism worldwide-accepted standards.*”

GPML is a global programme with a technical cooperation focus, which is implemented by field-based advisors and mentors and a core-team of headquarters-based professionals. It is almost entirely funded from extra-budgetary hard-earmarked sources, with the United States as its main donor. The Global Programme offers a range of products and services, including a website with AML/CFT reference material, a database on legislation and related documents, advisory services and training, both face-to-face and computer based. Its ‘mentoring programme’ is a major component of its work, with currently four mentors and four long-term consultants, providing long-term practical advice and assistance to institutions in countries of their region.

This independent evaluation of GPML has been carried out by a team of independent external experts, in cooperation with the Independent Evaluation Unit of UNODC. It is based on the evaluation criteria relevance, effectiveness, efficiency, impact and sustainability, with a special focus on partnerships and cooperation. The programme’s ‘logical framework’ set out GPML’s expected results. The evaluation covers the period June 2004 to June 2010 and draws on information from a desk review of documents and record data, a large number of interviews with beneficiaries, partners and UNODC staff, visits to twelve countries, and a sample survey of beneficiaries.

Overall, the evaluation finds that the programme has been successful in achieving its objectives and provides the right mix of outputs and activities to answer the challenges of combating money laundering and, to a more limited extent, the financing of terrorism. Its success has been generally noted among the national and international specialists working in the field of AML/CFT, as well as by counterparts and beneficiaries in the countries and regions where it has been active. The evaluation finds that the most significant added value of GPML activities is the mentorship programme. The evaluation concludes that GPML deserves to be extended with increased and more secure funding. However, this evaluation identified a number of issues, which need to be addressed.

GPML has been highly relevant in enabling countries to address the problem of money laundering and terrorist financing, which is central to the implementation of the UN Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, the Convention Against Transnational Organized Crime and the Convention against Corruption, as well as the International Convention for the Suppression of the Financing of Terrorism. It has also supported the adoption of global standards developed by the Financial Action Task Force (FATF), the major standard-setter in the field of AML/CFT.

In its resolution 65/323, adopted on 23 November 2010, the General Assembly highlighted the relevance of the programme: “*14. Urges the United Nations Office on Drugs and Crime to continue providing technical assistance to Member States to combat money-laundering and the financing of terrorism through the Global Programme against Money-Laundering, in accordance with United Nations related instruments and internationally accepted standards, including, where applicable, recommendations of relevant intergovernmental bodies, inter alia, the Financial Action Task Force on Money Laundering, and relevant initiatives of regional, interregional and multilateral organizations against money-laundering;.*”.

The programme’s products and services, including advice, training, publications and databases, are demonstrably used, but are not as well-known as would be desirable. There is evidence of good use of GPML’s website IMoLIN, the ‘International Money-Laundering Information Network’, and its AMLID database, reflected in downloads of documents. One of its products, the Computer Based Training (CBT), has been extensively disseminated since 2004 and is now available in eight different languages. However, as there was no focus on collecting data on use and outcome level results, the extent of CBT use is not clear. There is evidence that reports and documents produced by GPML are used by international organizations and UN entities, including the United Nations Security Council Counter-Terrorism Committee and the Commission on Narcotic Drugs, in adopting global policies on money laundering. However, GPML was not requested in the past to provide reports to the Commission on Crime Prevention and Criminal Justice.

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

One main lesson learned from the evaluation and a notable best practice is that the mentor system is a highly effective way to deliver assistance in a highly technical field, but that the knowledge acquired does not always get translated into policies that can be developed at the intergovernmental level. Another major lesson learned relates to the importance of networks, which GPML successfully established over time and which enable the programme to identify high level experts with the right skill set for its mentoring programme. This network also constitutes the basis for effective provision and coordination of assistance.

The potential sustainability of the programme’s results have been noted, but the programme’s own sustainability is at risk, in large part due to the unpredictability of funding. The 2004 evaluation recommendation relating to increased core funding for the

programme has not been implemented. In addition, GPML has not implemented the 2004 evaluation recommendation that it undertake a strategic planning exercise. Developing a strategic plan for the period 2011-2015 would provide a basis for prioritization of activities, a more systematic collection of outcome level results data and, potentially, for more consistent funding.

GPML has worked successfully with a variety of partners such as the World Bank, the IMF, the Counter-Terrorism Implementation Task Force (CTITF), the FATF and FATF-style regional bodies (FSRBs) and bilateral organizations. The evaluation found that GPML actively reached out to partners through e.g. newsletters and bilateral meetings and participated in relevant meetings of FATF, Egmont Group and FSRBs: much of coordination both with partners and beneficiaries takes place in the margins of these meetings. In addition, GPML was involved in a number of joint activities such as joint training, and provided inputs into publications of other organizations, e.g. the Financial Analyst training material developed by the Egmont Group and the World Bank. Cooperation and communication usually takes place informally rather than on a formal and institutionalized level, but there are also some examples of more formalized cooperation, e.g. in connection with the jointly funded World Bank/UNODC mentors.

While activities related to coordination and quality control of AML/CFT related projects in the field have generally been effective, there have also been some constraints which can in part be attributed to the small size of the headquarters staff and the challenge of raising long-term and secure funds. In addition, GPML has been negatively affected by a series of reorganizations in UNODC headquarters that has moved it from being a visible global programme within the Division for Operations to being part of a section within the Organized Crime and Illicit Trafficking branch of the Division for Treaty Affairs. GPML is not currently included in the UNODC strategic framework for 2012-2013, even though the General Assembly has adopted resolutions recognizing GPML's role. There is evidence of efficient, yet informal cooperation with some sections within UNODC, e.g. in connection with terrorism prevention. However, GPML's position and limited visibility has in some cases resulted in insufficient utilization of its expertise and networks, with a risk of duplicating existing structures.

With these findings and conclusions in mind, the evaluation makes eleven specific recommendations, which are described in detail in the following summary matrix of findings, supporting evidence and recommendations.

Summary matrix of findings, supporting evidence and recommendations

Findings	Supporting evidence	Recommendations
1. The programme is well established and has been particularly successful in providing training and advisory services at the field level, thereby enabling recipient countries to address money laundering more successfully.	Desk review of reference documents, interviews with beneficiaries and partner institutions, as well as the survey of training and mentoring recipients all supported that finding. When asked for the particular value added of GPML, stakeholders	UNODC's senior management should <u>continue the programme</u> and give it <u>more priority</u> , in order to make best use of its developed reputation, networks and experience, and the comparative advantage of a United Nations programme, which is

Findings	Supporting evidence	Recommendations
	frequently mentioned its practical region based approach, its high level expertise, global experience and network of contacts, as well as its ‘neutral broker’ role as a UN programme, which does not do compliance assessments of AML/CFT regimes like the World Bank and IMF.	perceived as a global player and as more impartial and aware of regional characteristics than other AML/CFT technical assistance providers.
2. GPML has been affected by the realignment at UNODC headquarters, which has reduced its organizational visibility and poses a risk to its function as the organization’s source of AML/CFT expertise. The evaluation found that a strong centralized thematic core programme is needed to guarantee coordination, quality, consistency and a strategic approach of AML/CFT related UNODC projects globally.	The cross-cutting nature of AML/CFT related work is evident in the relevant UN conventions and in the actual work done by GPML and partner organizations. However, as a result of realignments, GPML is now part of the Implementation Support Section of UNODC’s Organized Crime and Illicit Trafficking Branch of the Division for Treaty Affairs, which limits its formal involvement in e.g. corruption related issues. Stakeholder interviews confirmed the need for centralized AML/CFT coordination and quality control.	UNODC’s senior management should consider the cross cutting nature of AML/CFT and the limitations resulting from the positioning of GPML under one of the convention related branches, and take steps to <u>ensure its organizational visibility</u> and its ability to provide assistance to other conventions and effective centralized quality control of AML/CFT related UNODC projects.
3. Although a detailed logical framework of expected results was prepared for the 2008 project document, the programme does not have a strategic long-term plan, which systematically considers needs and outcome results data to identify regional and global priorities. This is seen as a major constraint of the programme, also in connection with securing long-term funding. In this regard UNODC’s integrated planning approach will be particularly relevant for GPML because of the cross cutting nature of AML/CFT and the programme’s focus on delivery of technical assistance on regional and country level.	The review of reference documents, particularly of work plans, confirmed the lack of strategic long-term planning. Progress reports showed a focus on delivery of activities and outputs, rather than outcome level results. GPML’s work is related to several other thematic sections of UNODC, making them relevant stakeholders for the development of the programme’s strategic plan. In addition, because of its technical assistance focus, GPML is also closely linked to UNODC’s activities in the field.	GPML should prepare a <u>long-term strategic plan</u> for the period 2011-2015, in coordination with senior management and in consultation with relevant UNODC sections at headquarters and in the field. Human and financial resources needed to implement the plan, as well as future modalities of key <u>stakeholder involvement</u> , should be clarified. The strategic plan, once agreed, should be consulted with donors.
4. The mentoring programme has proved to be a highly effective method of enabling governments to establish operational anti-money laundering systems and constitutes a	Observations and interviews showed that mentors succeeded in establishing relationships of trust and were known and appreciated personally by key stakeholders, in	GPML should <u>sustain and intensify</u> the <u>‘mentoring programme’</u> , with mentors or long-term consultants servicing several countries in a region, while ensuring that the

Findings	Supporting evidence	Recommendations
comparative advantage vis-à-vis other providers of technical assistance. The hands-on practical approach, focusing mostly on law enforcement, and the programme's more flexible response to local needs was found to be effective and highly appreciated by counterparts/beneficiaries and partner organizations.	spite of the fact that they serviced several countries in a region. Other providers of AML/CFT related technical assistance usually provided more short term assistance and did not have long-term AML/CFT experts based in the regions. The most frequently mentioned recommendation to improve the mentoring programme was related to extending the periods of assistance provided in the countries.	number of countries covered by each mentor or long-term consultant allows for longer periods of time in each country, and for a focus on countries where law enforcement is the priority. The detailed planning should be based on the long-term strategic plan and should include provisions for headquarters quality control.
5. While there have been relatively consistent levels of funding for GPML, GPML staff at headquarters invested considerable time in fund raising and proposal writing and a lack of more long-term funding hindered the development of a long-term strategy. Some years showed significant fluctuations in funding levels. This resulted in job insecurity, especially for mentors and long-term consultants, which is bound to ultimately make UNODC less attractive as an employer and seriously impair GPML's ability to maintain high level experts. Overall, considering the global challenge and the number of requests, funding levels are not sufficient.	Although the programme has a number of contributors, the US provides over 50% of the resources, on a yearly basis rather than long-term. In addition, the number of donors has decreased over time. GPML is heavily dependent on voluntary contributions, with only one post funded by the regular budget. Due to lower funding levels in 2009, GPML was not able to guarantee and maintain all mentors' positions in 2010. All staff at headquarters have functions related to programme management and implementation, backstopping for field activities and quality control, which means that time spent on fundraising directly impacts time available for other responsibilities.	UNODC's senior management should aim at a sufficient <u>long-term core funding</u> for GPML, if possible from the regular budget of the organization, in order to ensure the sustainability of the programme and its ability to adequately manage the global aspects of AML/CFT, as well as ensure coordination, quality control and consistency for UNODC's AML/CFT activities in the field. To the extent that funds can be provided from the regular budget of the United Nations, this should be included in the budget proposals for 2012-2013.
6. GPML's cooperation with UNODC field offices has already resulted in various valuable joint products and activities. While this is an achievement, the level of communication varies significantly and cooperation arrangements are usually informal and based on personal relationships. Considering the value of UNODC's integrated planning approach and the strong technical assistance focus of GPML, increased and more formalized communication and cooperation will be beneficial.	Review of reference material and stakeholder interviews helped identify several examples of very effective cooperation between GPML and field offices. GPML staff at headquarters usually provided input to AML/CFT related project documents. Mentors, where possible, are based in UNODC field offices and field representatives are first reporting officers for GPML mentors, which keeps them informed. However, there are severe limitations to their oversight and performance appraisal function, because GPML at headquarters provides funds and	<u>GPML and UNODC field offices</u> should continue to focus on increased and <u>more formalized communication</u> to <u>ensure regional integrated programming</u> , as well as quality control and consistency of all AML/CFT related UNODC projects. <u>Regional advisors for AML/CFT</u> , jointly funded by GPML and Regional Offices, should support coordination and programming, while GPML mentors should continue to focus on in-depth AML/CFT capacity building in selected countries. Clear and effective reporting structures need to

Findings	Supporting evidence	Recommendations
	strategic guidance based on AML/CFT expertise. In addition, there is no formalized arrangement that informs field representatives about GPML's global activities or ensures GPML is aware of all AML/CFT activities in the field.	be set up between mentors and UNODC offices in the field and GPML headquarters, ensuring that field representatives are kept informed and GPML can carry out its oversight function.
7. GPML is well-regarded by partner institutions who see its AML/CFT expertise and in-country experience across various regions as added value. GPML staff at headquarters, mentors and long-term advisors in the regions were often approached as the main UNODC focal points by AML/CFT partner organizations and beneficiaries who also considered GPML knowledgeable about the broader issues of corruption, organized crime or law enforcement.	Interviews with partner organizations and beneficiaries particularly confirmed this finding. Compared to the UN, the Financial Action Task Force (FATF) and FATF style regional bodies (FSRBs) offer more detailed recommendations and an advanced review system through Mutual Evaluations. GPML is well aware of the evolution of this global AML/CFT system and actively participates in it, also acting as the FATF focal point in UNODC. In addition, the programme's headquarter team is involved in convention related UN initiatives and reporting and cooperates with other UNODC sections like the Terrorism Prevention Branch and the Corruption and Economic Crime Branch.	UNODC's senior management should designate <u>GPML as a formal point of contact for partner entities</u> like World Bank and IMF, for all AML/CFT related matters, including corruption, asset recovery and terrorism prevention, in order to ensure that GPML is informed about and able to contribute to initiatives relevant to AML/CFT.
8. Publications and information available on GPML's website (IMoLIN) and its database (AMLiD) are used by partners and beneficiaries, but awareness amongst potential users is still limited. GPML has developed a number of valuable tools and documents that can be used by national counterparts, regional bodies and partners, but these have not been promoted and disseminated as well as would be desirable.	Desk review of reference documents, download statistics, interviews with stakeholders and the results of the survey of beneficiaries confirmed these findings. Even though GPML presented products at meetings of major partner organizations and regularly sent out newsletters, awareness of global products and services was particularly low among potential users in beneficiary countries, with the exception of ITS' goAML software.	GPML should put <u>more focus on promoting</u> its various valuable <u>products</u> , like tools, publications, the IMoLIN website and AMLiD database, as well as its AML/CFT Computer Based Training, and should continue to jointly promote the goAML software for Financial Intelligence Units developed by UNODC's Information Technology Service.
9. Although GPML met reporting requirements of donors and UNODC, and introduced an obligatory monthly mentor reporting, the evaluation found that there was a lack of focus on a more systematic recording of	Desk review of reference material and the collection of outcome related information for the evaluation confirmed that finding. One example is data related to AML/CFT Computer Based Training centers.	GPML should use its strategic plan for the period 2011-2015 as the basis for acquiring and <u>recording results data more systematically</u> . It should ensure that all relevant information, particularly on outcome level results

Findings	Supporting evidence	Recommendations
outcome level results and lessons learned.	While the number of countries where such centers were established increased from 4 to 46 since 2004, and the training was translated into seven additional languages, there was no systematic collection of information on users and use.	related to its activities, is readily available for coordination, oversight and knowledge management. This information should also include a database of counterparts/beneficiaries and partners, and mentoring related lessons learned.
10. The programme puts a focus on cooperation and coordination with partner organizations and other providers of technical assistance and has successfully built up an extensive network of contact points across the major organizations relevant for AML/CFT. Though this led to a number of joint activities and products and improved coordination of activities, this cooperation typically remains informal. Overall, there is still a major need for increased coordination among technical assistance providers, which is also true for AML/CFT related activities.	The evaluation confirmed the high relevance of GPML's network of partner organizations and beneficiary institutions, which included Ministries of Finance, police, prosecutor offices, customs organizations, regulatory authorities and financial service providers. GPML actively reached out to partners through e.g. newsletters, bilateral meetings and joint activities and aimed at participation in all relevant meetings of FATF style regional bodies (FSRBs), the Egmont Group and FATF. These meetings, though not necessarily institutionalized, are where TA providers typically come together and meet with beneficiaries in order to identify needs, offer their services and coordinate their assistance.	GPML should continue to <u>proactively seek to improve coordination among technical assistance providers</u> through measures like newsletters, bilateral meetings and joint activities and, in addition, through a more formalized cooperation with partner organizations and lobbying for the institutionalization of meetings for technical assistance providers and beneficiary FIUs in order to coordinate, harmonize and finalize their assistance plans in the margins of FATF, Egmont Group and FSRB meetings.
11. GPML's 'prosecutor placement programme' has successfully fostered internships, specific and advanced training and networking between different countries of a region. This type of activity is particularly relevant for sustainability, as it supports cross border cooperation and networks and the exchange of best practices.	Interviews with various stakeholders in the focus region of the prosecutor placement programme confirmed the value of this type of programme. There is a consensus among experts that international cooperation is essential to address the AML/CFT related challenges. GPML is in a unique position to identify and foster exchange of best practices in countries or regions.	GPML should <u>identify centers of excellence and best practice examples in all regions</u> and use its 'prosecutor placement programme' as a model for fostering learning and networking between various law enforcement agencies, including Financial Intelligence Units, of different countries and regions and for improving cross-border cooperation.

II. MANAGEMENT RESPONSE

[The official management response will be inserted before the final report is posted to the UNODC website.]

III. INTRODUCTION

A. *Background and context*

As the successor to the *Global Programme against Money Laundering* (GLOB79) which was established in 1997 under the then United Nations Drug Control Programme (UNDCP) the new project GLOU40 entitled *Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism* encourages policy development on anti-money laundering (AML) and countering the financing of terrorism (CFT), raises public awareness about the cross-cutting aspects of money laundering and the financing of terrorism, contributes to the strengthening of governance measures and anti-corruption policies, and acts as a centre of expertise of anti-money laundering and, jointly with the Terrorism Prevention Branch, countering the financing of terrorism.

The Programme provides advisory and training services to interested governments and regional associations through resident mentors, missions by UNODC headquarters staff and contracted consultants. It maintains a website (IMoLIN¹) with newsletters, tools and reference material and a database of legislation and related reference documents (AMLiD²). It also provides input into intergovernmental policy decision-making through reports of the UNODC Secretariat to which it contributes.

GPML works in conjunction with partners like the World Bank, the International Monetary Fund, the Egmont Group of Financial Intelligence Units (FIU), the Financial Action Task Force (FATF), FATF style regional bodies (FSRBs) and the United Nations Counter-Terrorism Committee (CTED)³.

The Programme is pivotal to UNODC's mandate to prevent drug offences and other crimes in that it offers specialized services and tools to help Governments deal with an important action against crime, the removal of profits of such crime, thereby providing a disincentive for committing them.

This was also explained in the Working paper prepared by the Secretariat for the Twelfth United Nations Congress on Crime Prevention and Criminal Justice on International cooperation to address money-laundering based on relevant United Nations and other instruments (A/CONF.213/8. Para. 65):

"UNODC, in particular through its Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism, has been mandated to strengthen the ability of Member States to implement measures against money laundering and to assist them in detecting, seizing and confiscating illicit proceeds, as required pursuant to United Nations instruments and other globally accepted standards, by providing relevant and appropriate technical assistance."

¹ 'International Money Laundering Information Network', www.imolin.org

² 'Anti-Money Laundering International Database', link from the IMoLIN website; restricted access

³ See list of persons interviewed (Annex H) for additional relevant partner organizations.

B. Purpose and scope of the evaluation

As foreseen in the project document (GLOU40) and in accordance with the work plan of UNODC's Independent Evaluation Unit, an independent in-depth evaluation of the Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism and its predecessor (GLOB79) needed to be conducted for the period June 2004-June 2010. It has been carried out by a team of three independent external experts (see Annex A), in cooperation with the Independent Evaluation Unit of UNODC.

This evaluation has been conducted in order to (1) provide information on the impact of UNODC activities for better decision-making by UNODC management (best practices and lessons learned), (2) assess the results of the project and demonstrate to what extent it has achieved its objectives and has been relevant, efficient, cost effective and sustainable, (3) serve as a means to empower project stakeholders, target groups, and other beneficiaries. In consonance with the programme's worldwide coverage, this independent evaluation covered activities for the period of June 2004 to June 2010, and its purpose was to derive recommendations and lessons learned from measuring the outcomes obtained by the project. Evaluator recommendations for the future, including for continuing or modifying the project based on performance, are intended to better equip GPML to improve its core initiatives and governance structure.

C. Executing Modalities of the programme

GPML was originally established as a self-standing project within the Division of Operations. In 2008, it was part of the Governance, Human Security and Rule of Law Section of the Division for Operations. In April 2010, it became part of the newly created Implementation Support Section (ISS) of the Organized Crime and Illicit Trafficking Branch under the Division for Treaty Affairs.

The programme is implemented by a core team of professional staff and administrative support personnel at headquarters and mentors and long-term consultants/advisors based in various regions. In late 2010 the team consisted of a core team of seven headquarters-based staff members, including two General Service staff, and eight long-term consultants and mentors based in the regions,⁴ covering countries in West and Southern Africa, Central Asia, South East Asia and Mekong region, the Pacific region and Latin America and the Caribbean (Annex L),

GPML long-term advisors and mentors typically have many years of AML/CFT related expertise and are practitioners. Provided that FIUs are already established, they mostly focus on FIUs and law enforcement, though legal mentors assisted countries in drafting AML/CFT laws. Advisors/mentors involved in the mock trial programme in Latin America and the Caribbean have a legal background, but the mock trial training targets prosecutors and law enforcement rather than legislation drafters.

⁴ One intermittent long-term consultant for the Pacific region is based in the USA and in accordance with the agreement with the World Bank, the Central Asia mentor is based in Eastern Europe.

Advisors and mentors are based in the field, in UNODC field offices where possible⁵, and work for GPML full time or intermittently, providing technical assistance to countries in their respective regions, in accordance with the work plan. While long-term advisors and mentors are based in a country, they travel in order to service the other countries of their regions as well. Depending on the number of countries to which they provide assistance, they usually visit each country several times per year, usually for one to four weeks.

In 2010 two advisors/mentors were jointly funded with the World Bank, while two were mostly funded by UNODC's Legal Advisory Programme and Legal Assistance Programme in Latin America and the Caribbean (LAPLAC). Advisors/mentors report to UNODC field representatives (first reporting officers) as well as GPML programme management at headquarters. Obligatory monthly reporting based on a standardized format was introduced in 2009. Joint GPML/World Bank mentors also report to the World Bank.

While staff at headquarters provide project management, backstopping and oversight services for the mentor and advisor network ('mentoring programme'), they also travel to relevant normative meetings (e.g. FATF, Egmont Group, FSRBs), produce publications and update and administer the IMOLN website and the AMLID database. They act as focal points for general internal and external requests and prepare funding proposals and progress reports for UNODC and donors. To some extent, headquarters-based GPML staff is also involved in training activities in the field⁶.

For the evaluation review period (June 2004-June 2010), GPML's financial management was recorded under project GLOB079 (1997-2009) and GLOU40 (2008-2010). Voluntary resources account for more of 90% of GPML's annual budget⁷, with the United States as its main donor. Currently only one post is funded from the regular budget of the United Nations. Since the programme's inception in 1997, extra-budgetary sources totalled rounded USD 28.58⁸ million and were provided by a large number of contributors, as shown in Figure 1. While the amounts of resources spent per year have mostly been within the USD 2 – 3.25 million range, sometimes with considerable fluctuation (2008-2009)⁹, the Programme has become more dependent on a smaller number of donors in recent years (see Figures 1-3). Since 2008 the programme succeeded in attracting smaller pledges from new donors. These pledges, however, were usually very hard earmarked.

⁵ There are UNODC offices in Senegal, Viet Nam, Kenya and Colombia, where mentors/ advisors were based in 2010, but no UNODC offices in Namibia or on the Pacific Islands.

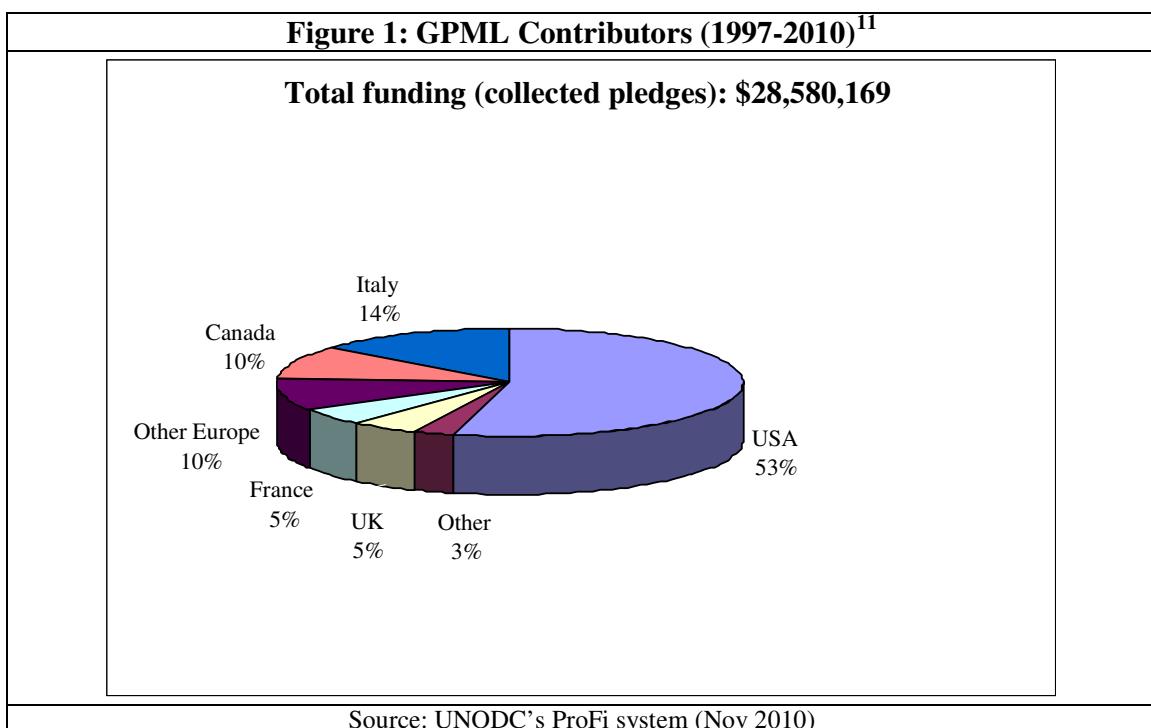
⁶ About 60% of face to face training is provided by long-term mentors/ advisors, about 30% by HQ staff and about 10% by long-term consultants.

⁷ In addition to one regular budget position, the programme had an average regular budget contribution of about USD 50,000 per year (rounded 65,000 in 2010) for e.g. consultants, Expert Group Meetings, printing.

⁸ For 2010 not all pledges have been collected yet.

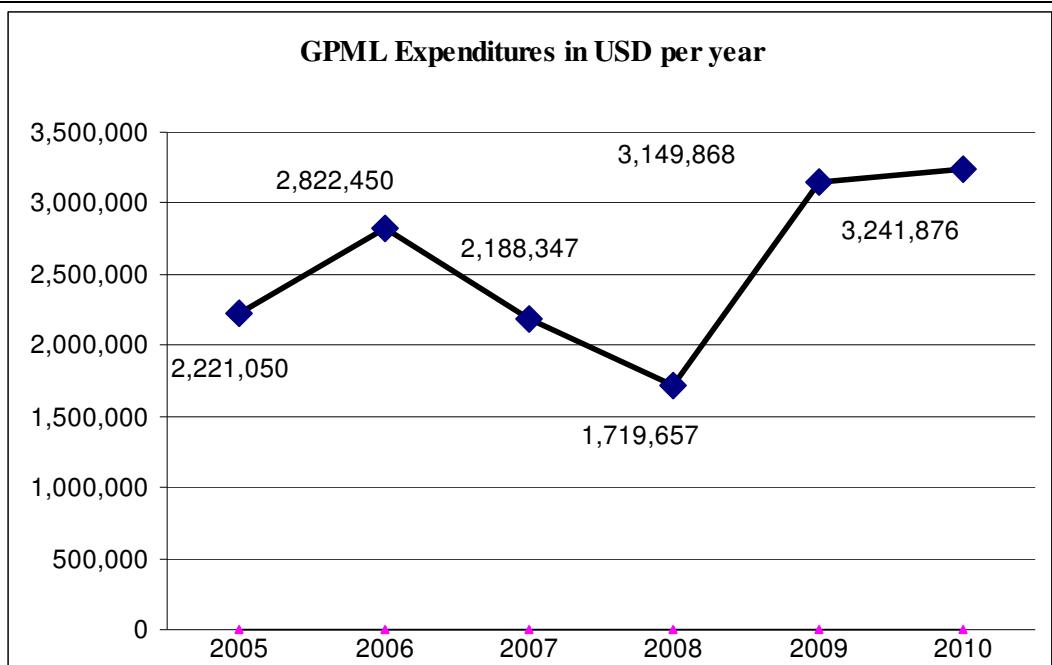
⁹ The USA requested GPML to take over the administration and management of the Pacific Anti-Money Laundering Programme (PALP) in September 2008 and pledged an additional US\$ 1,5 million for this purpose, which resulted in significantly higher funding levels in 2009.

It is important to note that UNODC collects project (or programme) support costs (PSC) of 13% on special purpose fund expenditures (extra-budgetary, voluntary contributions), which are not part of GPML's operational budget. PSC income does not feed back into the programme directly, but goes to UNODC centrally to cover indirect costs related to administrative support functions at headquarters (e.g. Human Resources Management Service, finance personnel) and project management functions in the field offices.¹⁰ In those cases where UNOPS was the implementing agency for e.g. recruitment or procurement services, PSC income was shared with UNOPS (see table 1).

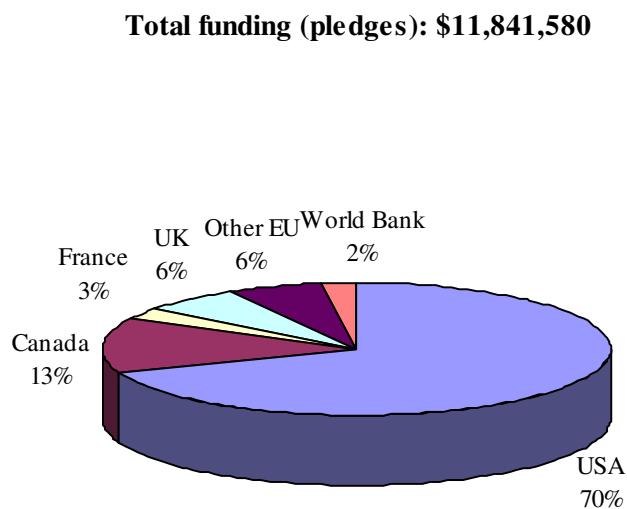


¹⁰ PSC income is distributed between the Division for Operation (DO) and the Division for Management (DM) based on the formula presented in the budget (2/3 for DO, 1/3 for DM) and spent in accordance with the budget.

¹¹ 'Other' includes The World Bank, Antigua and Barbuda, Public Donations and the Asian Development Bank

Figure 2. GPML Expenditures (2005-2010)

Source: UNODC's ProFi system (Nov 2010); 2005-2009 actual expenditures, 2010 allocations

Figure 3. Contributors to GLOU40 (2008-2010)

Source: UNODC's ProFi system (Nov 2010); not all pledges for 2010 collected

In terms of objects of expenditure, as can be seen from Table 1, GPML spent the largest percentage of its extra-budgetary funding on international experts and consultants, followed by travel and training (including fellowships).

	2008	2009	2010
Experts	48.1%	36.0%	33.5%
Other personnel	13.7%	9.6%	9.8%
Short-term consultants	5.4%	16.0%	10.2%
Travel	15.7%	19.3%	17.7%
Training and fellowships	3.3%	5.2%	11.2%
Meetings	-	0.4%	1.0%
Other	2.4%	2.0%	4.7%
Project Support Costs to UNODC	8.1%	7.9%	10.7%
Project Support Costs to UNOPS	3.4%	3.6%	0.8%
Allocation reserve	-	-	0.4%
TOTAL in USD	1,719,657	3,149,868	3,241,876

D. Methodology

The evaluation criteria used¹² are relevance, effectiveness, efficiency, impact, and sustainability. In accordance with the Terms of Reference (TOR) for the evaluation (Annex C), lessons learned were identified and ‘partnerships’ added as an additional aspect to be analyzed in detail. The corresponding evaluation questions identified in the evaluation TOR served as a basis for data collection and the development of evaluation tools like the questionnaires for qualitative interviews and the beneficiary survey.

Relevance relates to UNODC’s mandate, but also to the needs of the recipients, while effectiveness is concerned with the relationship between outputs and outcomes, which was the main focus of the evaluation. Limitations related to the measurement of objectives and outcomes, as defined in the logical framework of the project document, are detailed in the following limitations section of this report. Efficiency, the relationship between inputs and outputs, was judged, to the extent possible, in terms of findings on effectiveness. Impact, which refers to the long-term achievements of GPML, but typically needs longer-term (and often lagged) data that are acquired by beneficiaries of the programme rather than by the programme itself, was determined based on 2004 baselines, if available, progress reporting and information on the activities of other technical assistance providers in a country. Attributions of stakeholders were considered to some extent, but triangulated with other sources. The sustainability related questions focused on the AML/CFT structure in Member States and on whether or not self-sufficiency and ownership have been promoted by the programme. Some questions also related to the programme’s own sustainability, which is very much related to its funding structure. Even though sustainability is essentially a process variable, it can be measured based on an analysis of how the programme has delivered its outcomes, its relationship with donors, funding levels, and how it has been placed in wider strategies of the organization and embedded in the organizational structure.

A first step of the evaluation was to translate the objectives and outcomes in the project document into a logical framework (or ‘logframe’) that could be measured and therefore evaluated. This involved connecting the outputs and activities of the project to the outcomes that were expected to result, and organizing these in terms of the objectives that were expected to have been achieved by 2012. The revised logframe for the evaluation (see Annex K) is based on existing objectives and outcomes, which were converted into end-states that could be observed. The three objectives correspond to the three levels at which GPML works: the level of international policy and information exchange; national action; and coordination among different international actors.

The GPML project document states that its overall objective is “to assist States in building effective legal, regulatory and law enforcement capacity in compliance with the provisions of UN instruments and other anti-money laundering/countering the financing of terrorism (AML/CFT) international standards.” As drafted, this is an activity rather than an end-state and thus difficult to measure. Similarly, the programme outcomes, except for number two, are hard to measure, in spite of the indicators defined for them in

¹² Evaluation criteria of OECD’s Development Assistance Committee

the logical framework matrix (Annex B of the project document). The outcomes as defined in the project document are

- An awareness of the negative economic and social impact of money-laundering and the financing of terrorism amongst the following key stakeholders: Legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel), supervisory and regulatory authorities, officials of anti-corruption entities, and the private sector.
- Knowledge and expertise to combat money-laundering and the financing of terrorism effectively applied by legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel), officials of anti-corruption entities, supervisory and regulatory authorities and the private sector.
- Enhanced AML/CFT coordination and cooperation among Member States, international organizations and AML/CFT regional bodies.

According to the section on the scope of the evaluation in the evaluation's terms of reference the focus of the evaluation was intended to be on the following:

- to consider how GPML contributes to fostering awareness, global commitment and action to combat money-laundering and the financing of terrorism in coordination with different stakeholders including governments, the international community, the international financial institutions (International Monetary Fund and World Bank), the Financial Action Task Force (FATF) and FATF-Style Regional Bodies (FSRBs);
- to consider how effectively GPML supports structures for AML/CFT policies and institutional frameworks; and
- to consider how efficiently GPML promotes enhanced AML/CFT coordination and cooperation among Member States, international organizations and AML/CFT regional bodies;
- to determine the significance of the anti-money laundering / countering the financing of terrorism in the UN agenda and how GPML fulfills this mandate.

Based on the logical framework, data were acquired from three broad sources: records and documents (See Annex J List of reference documents), interviews with a wide range of stakeholders (Annex H), and a sample survey of persons trained or mentored (Annex G). The record and documentation review focussed first on the connection between policy proposals made by GPML and the extent to which these were reflected in documents adopted by the intergovernmental bodies to which they were sent. Secondly, the records review focused on the use of documents and other information made available electronically through the UNODC/ GPML website IMOLIN and the AMLID database, including especially downloads.

Interviews were undertaken over a four-month period with a wide sample of persons from beneficiary institutions, partner organizations, donors and UNODC staff, including GPML advisors and mentors based in the regions. The missions included an initial mission to UNODC headquarters in Austria and participation in international meetings held during the period of the evaluation, including the APG, ARINSA and the FATF

plenary meetings, where relevant participants were interviewed and the meetings observed. Some missions to specific countries were undertaken by the evaluation team, to Vietnam, South Africa, Namibia, Kenya and Kazakhstan, in order to interview beneficiaries, counterparts and partners in the countries, UNODC staff in field offices and GPML mentors. Country visits also included Canada, the United States and the Netherlands in order to reach donors and international partners. The selection of meetings and countries visited was based on the level and types of activities in a region/country, with some limitations related to the timing of the evaluation and the meeting schedules of FSRBs, as well as to resources for travel (see section E. Limitations of the evaluation). Interviews via Skype were arranged in order to also reach stakeholders in regions/countries not visited. Interviews with staff of partner organizations were conducted in. During the mission to Vienna, Austria, interviews with a selection of UNODC staff in Vienna were carried out, including the GPML programme team as well as staff of other relevant sections of UNODC, who are knowledgeable about the project and have cooperation experiences. The interviews also covered mentors and long-term consultants in the field, former GPML staff, advisors and mentors, beneficiaries and counterparts from 23 countries, and staff of 25 different partner organizations, as well as representatives of donor countries. Overall, 162 persons were interviewed across all relevant stakeholder groups. The mission schedule and full list of interviewees can be found in Annex H.

The distribution of interviews by stakeholder group is shown in Table 2.

Stakeholder group	total identified¹³	persons interviewed¹⁴	coverage¹⁵
GPML project team at headquarters	18	12	67%
GPML mentors and long-term consultants	18	12	67%
Beneficiary countries (mentoring) ¹⁶	54	56	43%
UNODC other sections (programme/country/ regional offices; HQ sections)	26	26	58%
partners/ other providers of similar type TA	25	54	84%
donor countries ¹⁷	13	8	38%

Finally, an effort was made to obtain data on the use of training and mentoring services by those who participated. Based on information supplied by GPML, a list of 987 individuals was obtained and a stratified random sample of 100 was drawn on the basis of participant geographic location and type of training provided, and the individuals were

¹³ Relevant AML/CFT stakeholders with exposure to GPML were identified by GPML and the evaluation team. Each UNODC section/office or partner organization counted once for total.

¹⁴ Actual number of persons interviewed: more than one interviewee per country, partner organization or UNODC office/ section; six interviewees interviewed in two capacities (for two stakeholder groups);

¹⁵ Only one representative per country, UNODC section/office or partner organization considered in order to determine coverage.

¹⁶ GPML activities took place in and benefitted 103 countries. The survey covered beneficiaries of mentoring and training participants (details in the following section).

¹⁷ World Bank, OSCE, Asian Development Bank and public contributions not included in total.

asked to fill in an on-line questionnaire. About twenty percent of the respondents in the initial sample could not be reached, due to out-of date email addresses. A replacement sample of 19 participants was drawn using the same methodology. About 63 percent of invitees responded to the survey. Of the participants who chose to disclose their demographic information (75%), 60% were male. At 16%, southern and eastern Africa had the maximum number of respondents. The response was slightly lower in the French and Spanish speaking regions, however all other regions were represented in fair proportion.

Table 3 below summarizes participant information.

Table 3. Survey Participant Information	
Participant Information	Frequency
Persons invited to participate	114
Invitees not reached due to wrong/ changed email addresses	19
Auto-vacation responses	5
Final sample	90
Completed responses	43
Partial responses (except demographic information)	14
Total responses	57
Response rate (57/90)	63%

In analyzing the findings, the evaluation also took into account the recommendations made in the evaluation of GPML undertaken in 2004.

E. Limitations of the evaluation

One limitation of the evaluation related to the logical framework. Since most of the focus areas, outputs and outcomes were based on the project objectives, they contained immeasurable terms (enhance, awareness) or were expressed as activities (promotes, fosters, supports) and for the purposes of the evaluation needed to be interpreted so that they could be measured. This was addressed in the creation of a logical framework, based on the original logical framework, which was updated for this evaluation (Annex K).

Resource and timing related limitations, which did not allow for country case studies in all regions and participation in all FSRB meetings (e.g. no country case studies in Latin America, Caribbean or Pacific region), were addressed through Skype and phone interviews, extensive desk review and the beneficiary survey.

The very high number of interviews across all relevant stakeholder groups and the triangulation of sources and tools helped to compensate for the survey related limitations, like the underrepresentation of CBT center users, which were not specifically added to the total population for the sample, and the fact that it was an online survey in English language.

IV. MAJOR FINDINGS

A. Relevance of the programme

Anti-money laundering is a central component in addressing crime and corruption of all kinds by reducing the monetary return. UNODC is the guardian of three UN conventions, which are all linked to AML, the Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, the Convention Against Transnational Organized Crime (UNTOC) and the Convention against Corruption (UNCAC). In addition, the International Convention for the Suppression of the Financing of Terrorism (Terrorism Financing Convention) provides the basis for GPML's mandate to fight terrorism through countering the financing of terrorism. GPML's work is thus closely linked to all four conventions and relevant to UNODC's mandate.

The evaluation found that stakeholders interviewed unanimously considered GPML to be relevant to the global campaign to stop money laundering and terrorist financing. Most stakeholders also believed that a programme of this nature is best managed from the organization's headquarters. Given that the global anti-money laundering measures are only as strong as the weakest link in the chain, centralized planning, monitoring and quality control must be seen as a necessity.

Stakeholders also recognized that GPML had clear competitive advantages in certain areas of money laundering control. GPML's mentoring programme and knowledge and competence in enforcement issues were widely recognized as the mechanisms that made substantial contributions to improving AML regimes worldwide. However, various partner organizations and some donors and beneficiaries suggested that GPML's result delivery could be improved further if its technical assistance had a sharper focus on enforcement, while international financial institutions focused their energies on assistance with legislation drafting.

Country beneficiaries/counterparts indicated an ongoing need in their countries for technical and practical AML/CFT support, which is provided by GPML. By now there is AML/CFT legislation in place in most countries, though sometimes as a dormant law, which needs a catalyst to move things forward in governments where there is either little political will to push AML/CFT legislation forward, or simply not enough funds available to set up the necessary infrastructure (e.g. trained financial investigators, IT system) and guarantee the effective implementation and compliance mechanisms needed. The needs identified by these countries particularly ask for more support from UNODC/GPML for practical training related to the role of the FIU personnel of financial investigators, including IT training.¹⁸

In addition, many countries that have successfully established an FIU are now at a stage where significant investments are needed to provide or improve the relevant IT infrastructure. In this respect the evaluation found that the joint promotion of the goAML

¹⁸ One example mentioned: To follow the money trail investigators need to be able to retrieve data that has been deleted on purpose to obfuscate the evidence. If there is not enough IT local knowledge available, outsourcing is mostly a too costly alternative, with the result that this important investigative work is not done.

software, developed by UNODC's Information Technology Service (ITS), with GPML contributions, is very timely and relevant.

B. Attainment of the programme objectives, outcomes and outputs

The evaluation looked at the extent to which the three specific objectives set out in the current project document have been achieved by GPML, including the outputs and outcomes intended to lead to the achievement of these objectives.

In addition, GPML was included in the UNODC Strategic Framework for the Period 2008-2011 under two expected results related to money laundering:

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

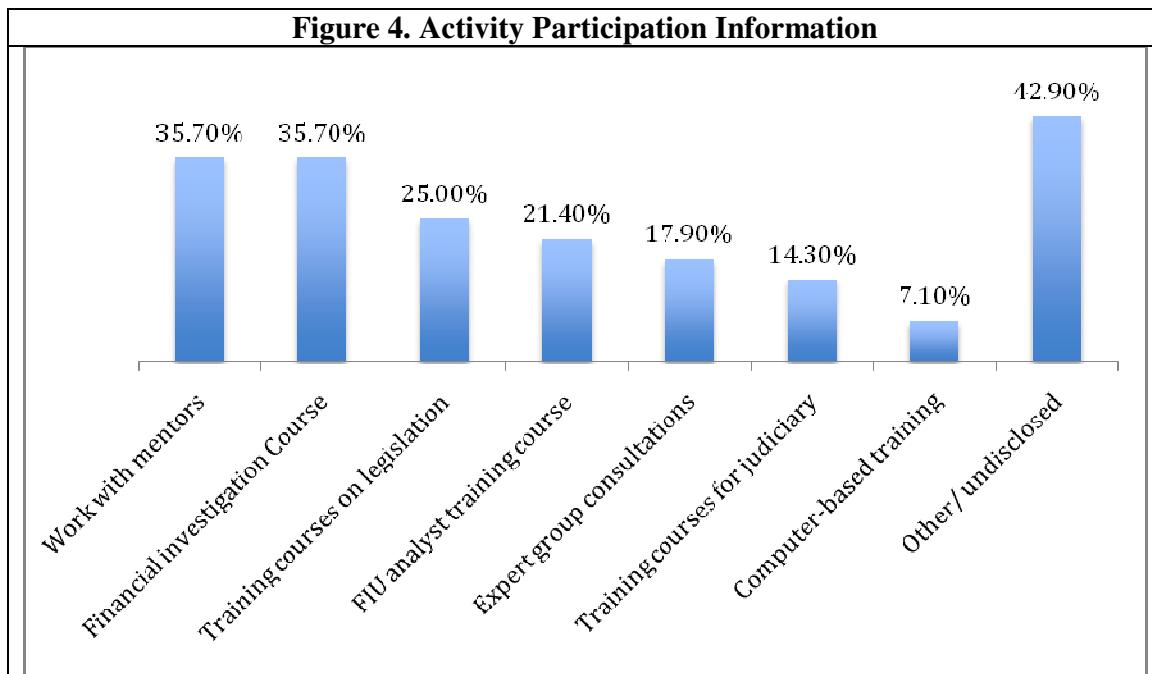
1.2.3. Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering related to organized crime, drug trafficking and corruption

If "strengthened capacity" means that countries assisted by UNODC have established legal regimes and improved their law enforcement, these two results have been achieved through a combination of the mentor system, other training and the information systems described below.

Specific Objective 1: Legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector aware of the negative economic and social impact of money-laundering and the financing of terrorism

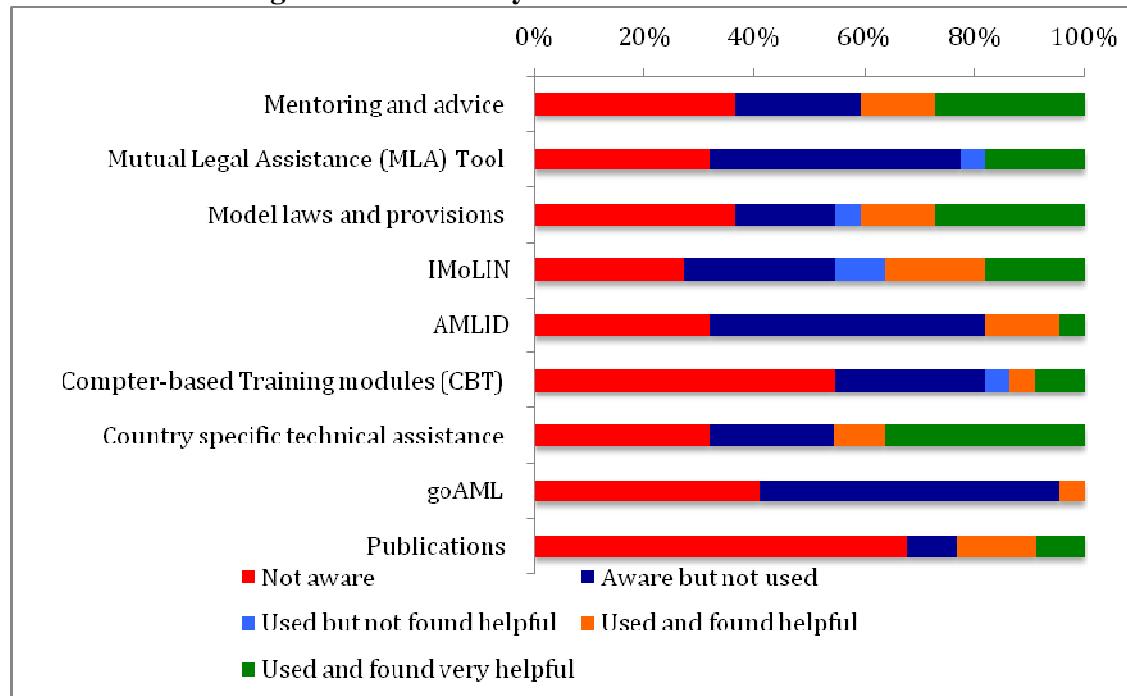
As drafted, the programme logframe suggests that the main objective is to increase awareness. The data assembled for this evaluation, however, shows that in fact the objective is to increase the extent to which legislative bodies and national officials deal with money laundering through policy documents, national legislation and law enforcement procedures. In this sense, as will be noted, GPML has had considerable success in achieving the objective.

The achievement of the objective is based on the actual usage of provided information and services. The survey suggested that there were not just a wide variety of GPML activities in which beneficiaries had participated, but also that a majority of them had participated in more than one activity (Figure 4).

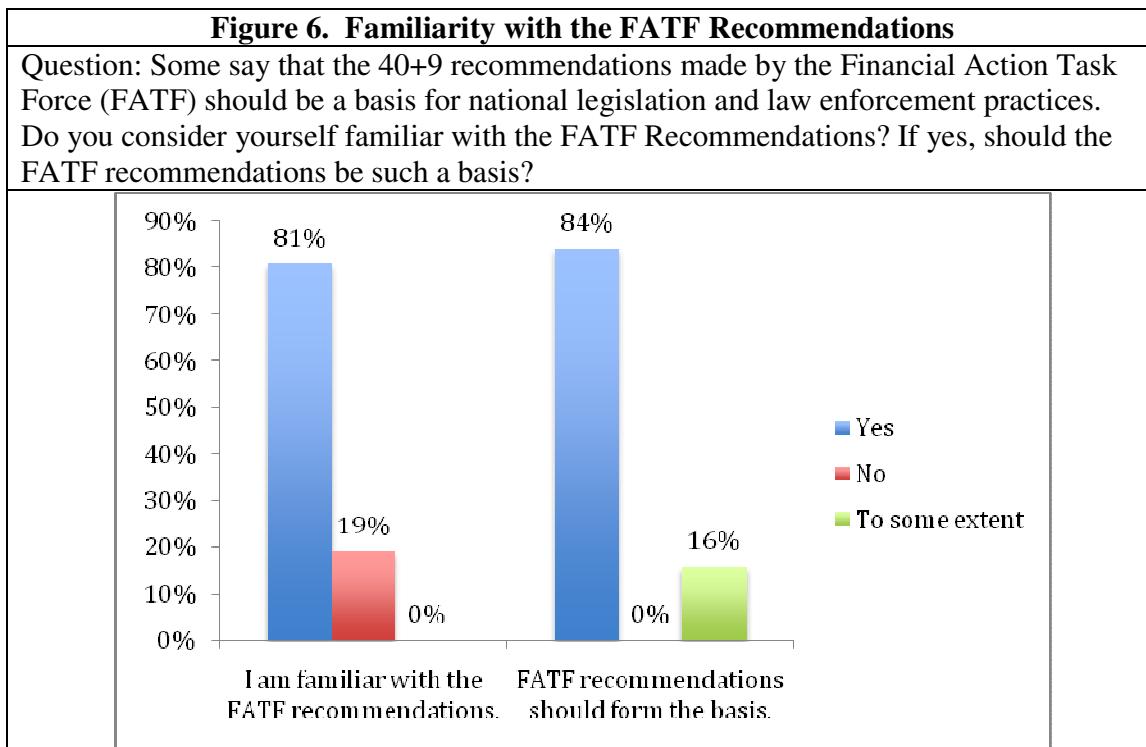


The survey asked, “which of the products and services provided by GPML are you familiar with and used.” As Figure 5 and Table 6 show, beneficiaries had used and found services such as country-specific technical assistance and mentoring to be very useful for them, but they had low awareness —and consequently use— of products such as publications and other resources available on the GPML website. Publications and CBT appear to be the least known and used products, even though it has to be considered that CBT center users were not particularly targeted in the survey and the regions with the highest number of CBT centers were not adequately represented in the survey sample. However, interviews with beneficiaries confirmed a limited awareness of publications, CBT and even the IMOLIN website as a resource. Both survey and interviews indicated a very high awareness of goAML, e.g. as a result of presentations at FSRB meetings and at the Egmont Group, though very few had actually used the software yet.

As noted in Figure 6, respondents were familiar with the FATF recommendations that form the basis of international standards for anti-money laundering and are included in both mentoring and training activities of GPML. It should be noted that there is also a consensus that they should be the main standards.

Figure 5. Familiarity with Products and Services**Table 6. Familiarity with GPML Products and Services**

	Not aware	Aware but not used	Used but not found helpful	Used and found helpful	Used and found very helpful
Mentoring and advice	36%	23%	0%	14%	27%
Mutual Legal Assistance (MLA) Tool	32%	46%	5%	0%	18%
Model laws and provisions	36%	18%	5%	14%	27%
GPML website: International Money Laundering Information Network (IMoLIN)	27%	27%	9%	18%	18%
Anti-Money Laundering International Database (AMLID)	32%	50%	0%	14%	5%
Computer-based Training modules (CBT)	55%	27%	5%	5%	9%
Country specific technical assistance	32%	23%	0%	9%	36%
goAML	41%	55%	0%	5%	0%
Publications	68%	9%	0%	15%	9%



1.1 CND adopts resolutions taking into account reports

The Commission on Narcotic Drugs dealt with anti-money laundering at all of its sessions between 2005-2010, with the exception of 2006. In most years there was a Secretary-General's report on money-laundering, until 2010, when there was no report included in the documentation before the Commission according to its report (E/CN.7/2010/18). There was clear evidence that, when a report was presented, it was taken into account. The clearest case was the Report of the meeting of the open-ended intergovernmental expert working group on countering money-laundering and promoting judicial cooperation, held in Vienna from 30 June to 1 July 2008 (UNODC/CND/2008/WG.2/3). The working group was given a Secretariat note (UNODC/CND/2008/WG.2/2), drafted by GPML, that made recommendations. A comparison of the recommendations proposed and those adopted by the working group shows that of 35 recommendations adopted, 20 were the same or similar to those proposed by the Secretariat. Only four of the Secretariat recommendations were not included in those adopted.

In contrast, the Commission on Crime Prevention and Criminal Justice did not take up money laundering during its sessions from 2005-2010 and there were no reports on the subject presented by the Secretariat. Although money laundering was mentioned by delegations in the debates of the Commission, there is, therefore, no evidence that GPML influenced that intergovernmental body.

However, GPML did organize the preparation of a paper, issued in the name of the UNODC Secretariat, on international cooperation to address money laundering based on

relevant United Nations and other instruments (A/CONF.213/8) for the Twelfth Crime Congress in Salvador, Brazil in April 2010. The paper contained nineteen recommendations, of which only four were included in the conclusions and recommendations adopted by the Congress. At the Congress, the item on money laundering was combined with the item on Practical approaches to strengthening international cooperation in fighting crime-related problems and this may have made it difficult to have a detailed discussion of the AML proposals.

One recommendation adopted referred to asset confiscation, which was not included in the Secretariat report, and stated:

“Asset confiscation and recovery should become an integral part of the strategy to combat money-laundering and other profit-motivated crime. States should have the ability and capacity to trace, freeze and confiscate proceeds of crime and afford the widest range of cooperation possible. States should consider taking the necessary measures to allow for the confiscation of assets without a prior criminal conviction, in accordance with the principles of their national legal system.”

This suggests that in the context of crime prevention, asset confiscation is an important element used to combat money laundering, a position argued by GPML in other documents. This was subsequently endorsed in General Assembly resolution 65/230 (see below.)

1.2 Increase in the number of persons using the CBT

While the number of CBT centres is known (see below), there are no data on the number of users. The survey asked the respondents to indicate if they had used the CBT. As mentioned in Figure 5, a large majority of the respondents were either not aware of CBT (55%), had not used it (27%) or had not found it helpful (5%). Only 14% percent found it useful. These results parallel the findings in the interviews, where a majority of persons indicated their complete lack of awareness and the remainder the fact that they had received the modules, but had not used them yet. Within this general trend of limited awareness, some regions showed more awareness than others, related to where CBT centers had been established and were operational. Since its first pilot in Fiji in 2004, the Asia Pacific region was a focus region for CBT, which was also reflected in the beneficiary interviews to some extent. Some countries institutionalized the training e.g. made it mandatory for new staff members. However, the overall awareness across regions and use of CBT continues to be rather limited.

Increased number of CBT centres

Over the period, the number of countries in which Computer-Based Training (CBT) centres with AML/CFT training modules were set up increased from 4 to 46, with sometimes more than one center per country. The establishment of centers sometimes included the provision of hardware and was usually accompanied by an introductory training. As can be seen from Table 4, the largest number of countries with newly-established centers were in Africa, and the greatest increase was in 2006. Since then, the pace of increase has clearly slackened as voluntary contributions for the CBT programme

have decreased. Most of the CBT centers (68 percent of 41 centres whose location was reported to the evaluation) were located with police institutions, with another 15 percent placed within Financial Intelligence Units.

Year Established	Africa	Asia and Pacific	Caribbean	Eastern Europe	Latin America	Grand Total
2002		3				3
2004	1					1
2005	5	4				9
2006		5	10		4	19
2007	8				1	9
2008	3			1		4
2009	1					1
Grand Total	18	12	10	1	5	46

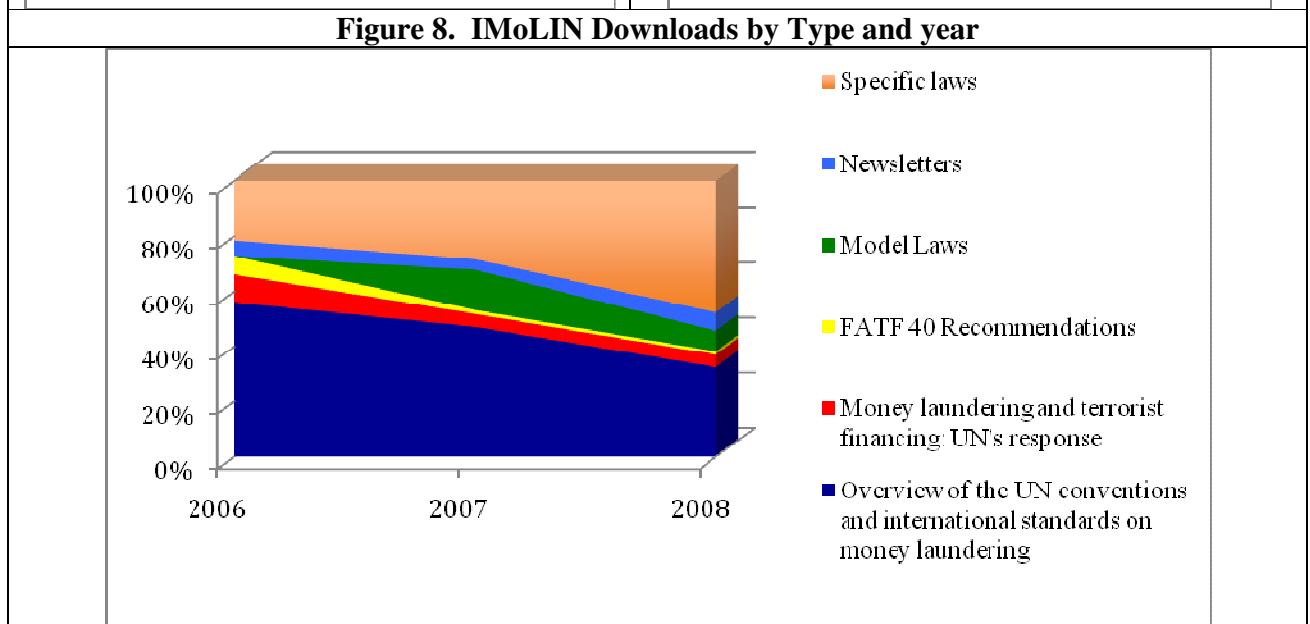
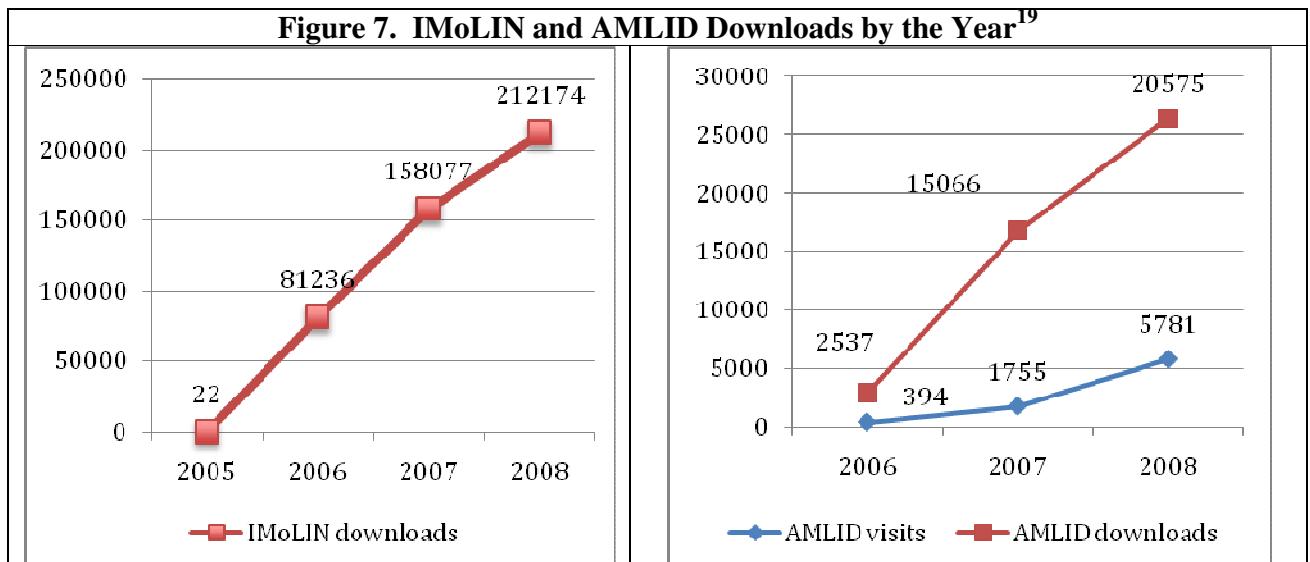
1.3 IMoLIN (and AMLID) used by intended users

An expected outcome under Specific Objective 1 is “IMoLIN used by intended users”. IMoLin is the International Money-Laundering Information Network website, maintained by UNODC as part of the GPML. This outcome is measured by the volume of use of the website as measured by downloads.

Complete download statistics for IMoLIN are available for the period 2005-2008. In 2009, UNODC’s ITS changed the content management system (CMS) used for monitoring use and records page visits and unique visitors rather than downloads. Due to that change and lack of comparability, the 2009-2010 figures have not been used in the analysis.

The IMoLIN website was first opened in 1998 and user statistics were first available in late 2005. That year there were a total of 22 downloads recorded by the CMS of ITS. As the GPML continued its use and development of IMoLIN, the number of downloads increased. Figure 4 shows the change over time.

Of perhaps more interest than the sheer growth is the importance of downloads of specific information from individual countries. In 2006, the largest downloads were of the full set of international conventions on money laundering. In 2007, there were large numbers of downloads of the model legislation, in all languages. By 2008, the main downloads were of individual laws and regulations that were being consulted. Figure 8 shows the result.



	IMoLIN Downloads by Type and year		
	2006	2007	2008
UN conventions and the international standards on AML	56.1%	47.2%	32.6%
AML/CFT: UN's response	10.1%	4.6%	4.5%
FATF 40 Recommendations	6.7%	1.4%	1.1%
Model Laws	0.0%	14.6%	7.5%
Newsletters	5.6%	3.9%	6.6%
Specific laws	21.6%	28.3%	47.7%

¹⁹ The downloads presented in the chart are based on the 20 top downloads for each year, as provided by ITS on the basis of the old content management system..

In addition, there are a large number of users of the password protected AMLID site with a wide geographical distribution, although the largest number of users is from EU, OECD countries and the US, as can be seen from Table 5.

Table 5. AMLID Users by Region		
Region	Number of users	Percent
United States	61	16.6%
European Union	114	31.1%
Other OECD	59	16.1%
Commonwealth of Independent States	21	5.7%
Africa	32	8.7%
Asia and the Pacific	43	11.7%
Latin America and the Caribbean	37	10.1%
TOTAL	367	100.0%

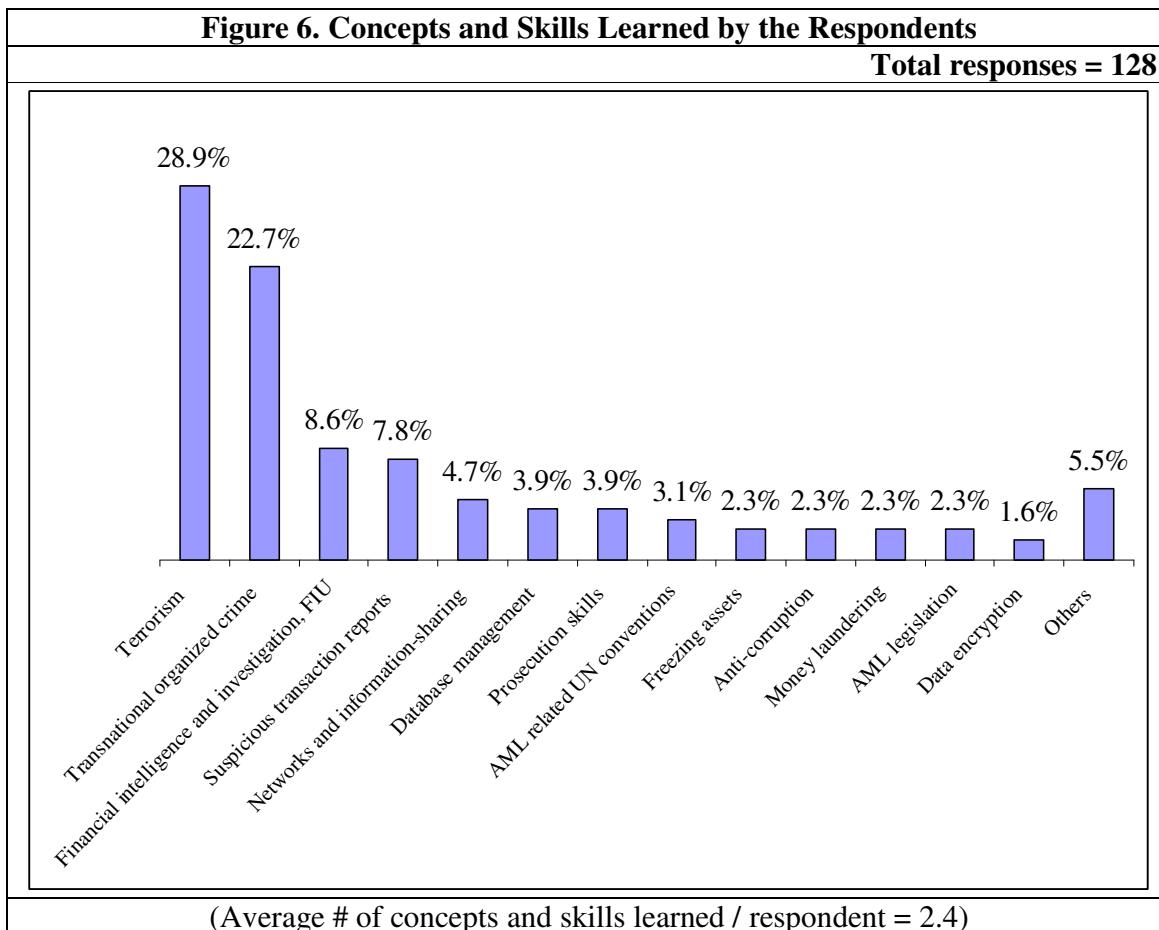
1.4 Studies are used by other organizations

Interviews confirm that GPML documents are used in the World Bank, International Monetary Fund, the Security Council Counter-Terrorism Committee and FATF. The World Bank publication, Politically Exposed Persons: Preventive Measures for the Banking Sector (2010) includes the current head of the GPML as one of the authors. However, there are no particular GPML composed “Studies on the vulnerability of informal economies to money laundering and the financing of terrorism”, though GPML contributed to the CTITF Working Group Report, Tackling the Financing of Terrorism, issued as a joint product of the World Bank, the IMF and UNODC.

Specific Objective 2: Knowledge and expertise to combat money-laundering and the financing of terrorism effectively applied by legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector

In connection with this specific objective, conducting training courses has been a major activity of GPML. Training that was provided included, but was not limited to, the programme’s FIU Analyst Course, its Financial Investigation Course and training on international cooperation. One particular focus area of the programme was cooperation between the relevant agencies in a country. A type of training used to enhance inter-agency cooperation, while also aiming at developing financial investigation and prosecution related skills, were mock trial training events. This training brought together staff of FIUs, financial police, prosecutors, judges and supervisory bodies for a simulation of a case investigation and presentation at court. An additional method used to bring together various relevant agencies were roundtable discussions which included private sector financial institution and supervisory bodies.

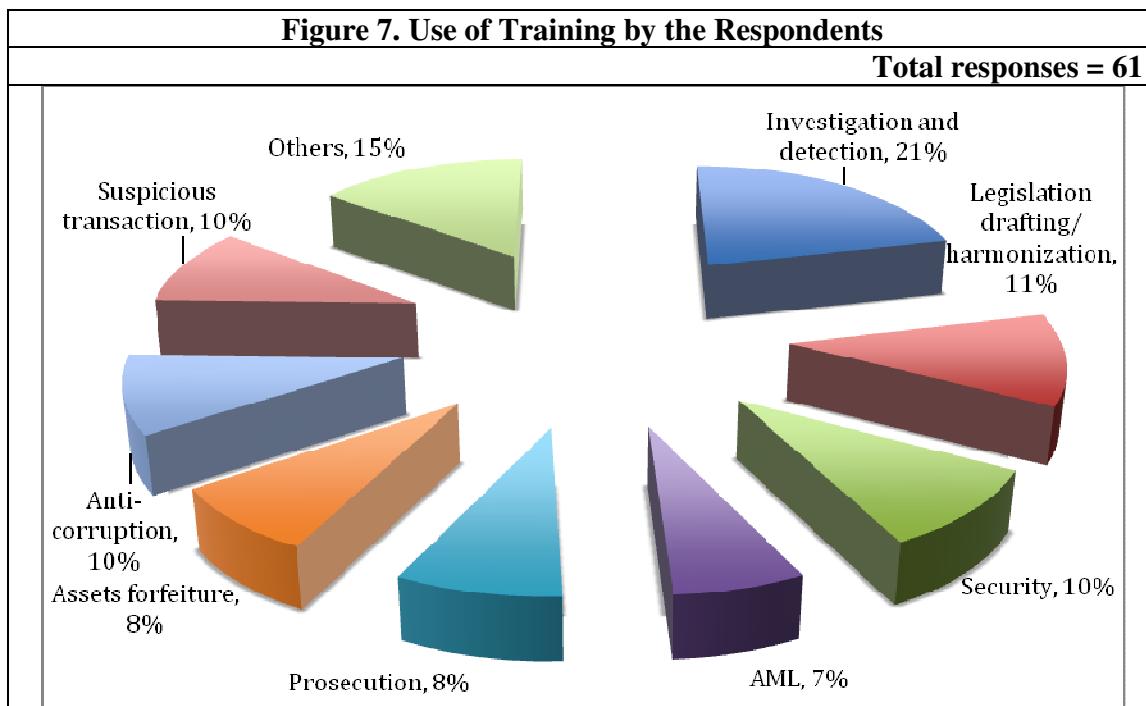
Both the interviews and survey results suggest that the beneficiaries learned and applied a wide variety of skills. Figure 6 summarizes the main concepts and skills learned by the survey respondents.



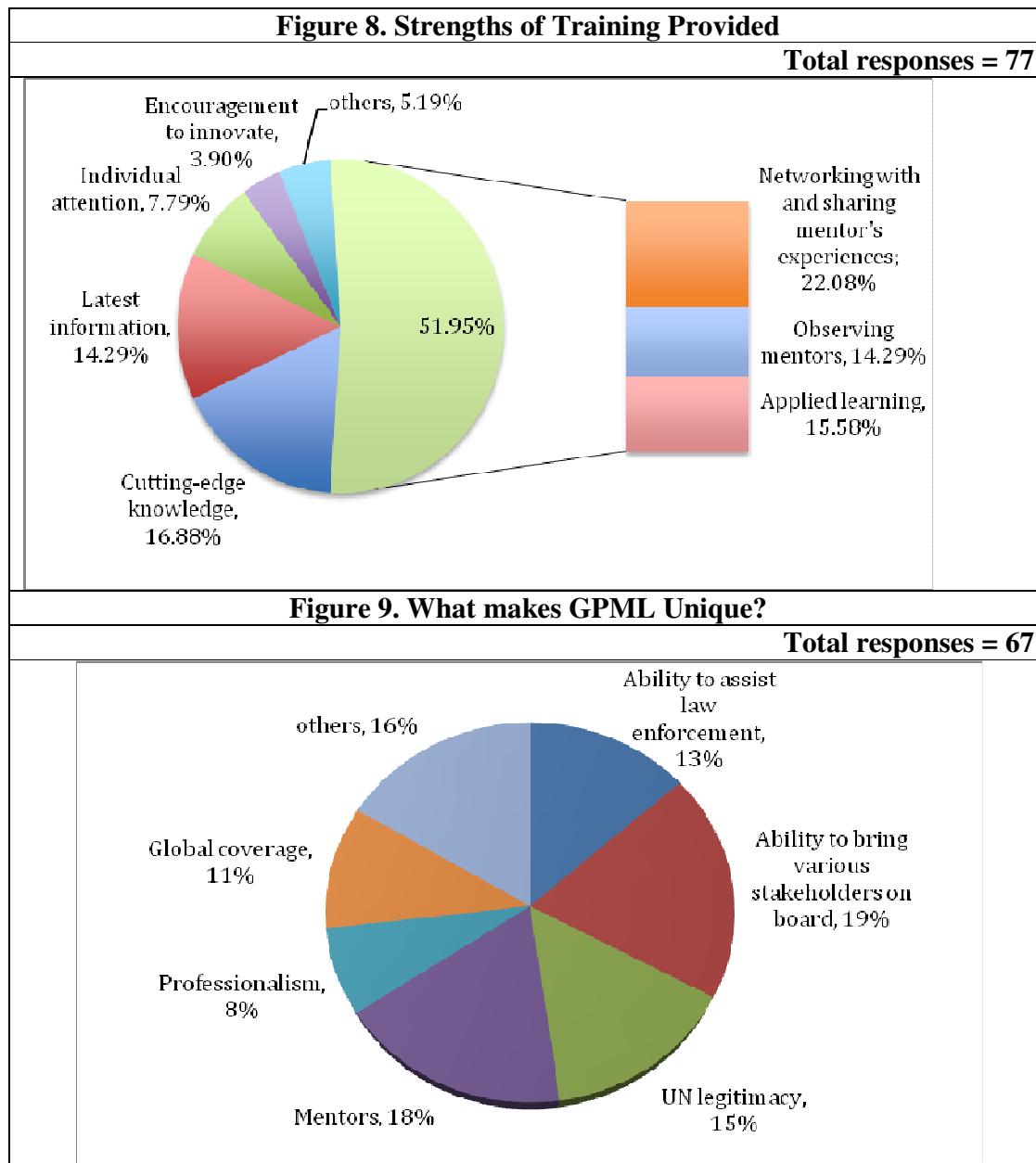
Financing of terrorism and transnational organized crime seem to have received the highest attention at these training courses, which is consistent with the information gathered from interviews on field missions. This emphasis helped focus attention on the money laundering issues around the world, but it also seems to have inadvertently created a wrong impression among some beneficiaries. In some countries, interviewees indicated that because of money laundering's association with terrorism many of their policymakers regarded it as a 'developed world issue' and agenda. A further point made in some interviews²⁰ was that the training was not sufficiently demand-based and/or was too simplistic for some trainees, whose skills and knowledge were beyond what was being offered. This finding, however, was not consistent across survey responses and interviews. In other cases training pre-tests confirmed that the level of the training was adequate for the majority of participants. Evaluation feedback questionnaires generally showed that expectations were met and courses received positive overall marks (mostly good and very good/excellent), while the replies to the question on complexity and pace usually showed significant variance.

²⁰ One case showed that while technical assistance providers were sometimes perceived as coming with a pre-set agenda for a training session, GPML mentors were considered open to the organization of a more tailor-made and demand-driven training. The training however was not provided due to a lack of funding.

As Figure 7 indicates, survey respondents seem to have put their training to good use on a wide variety of tasks, especially investigation, legislation and security.

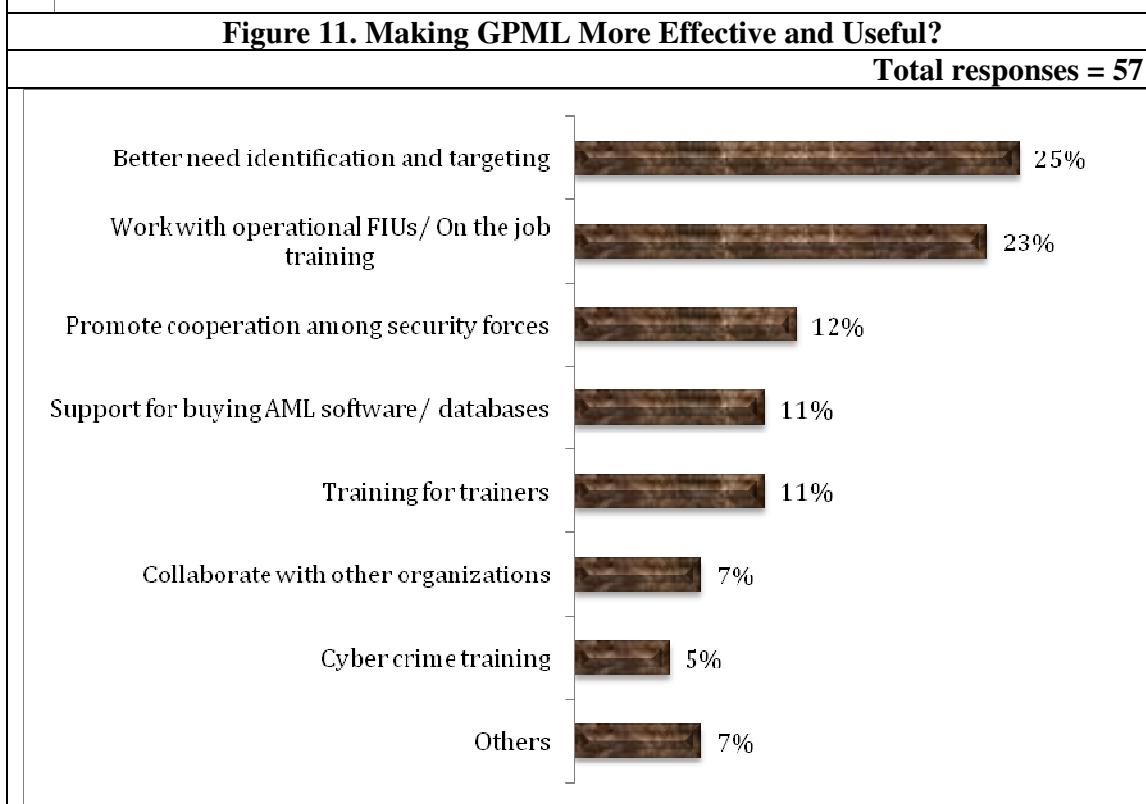
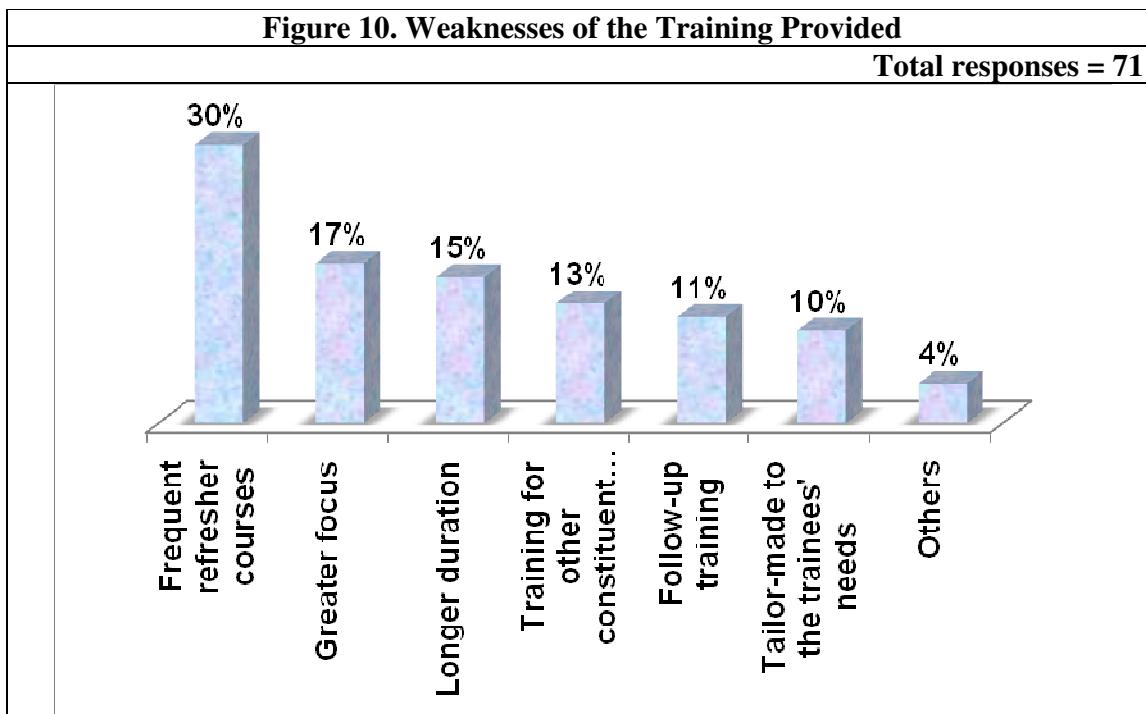


When the respondents were asked to list the major strengths of the training provided to them, more than half cited mentors or some aspect of mentoring (Figure 8). The importance of the mentoring system was further underscored in the participants' response to the question, "In comparison to other providers of technical assistance on money laundering what is unique about the GPML?" Alongside United Nations legitimacy and ability to bring various stakeholders on board, mentoring was one of the most cited reasons. In fact, in interviews with both partner organizations and beneficiaries, the mentoring system was found to be almost universally acclaimed.



Survey respondents identified short duration and the fact that training was not arranged frequently enough, as well as lack of focus as the primary weaknesses of the training provided to them. Furthermore, survey respondents stated that training would also have a beneficial effect on other constituent groups such as politicians and legislators. They also suggested a variety of measures to improve the training, as shown in Figure 10, particularly better needs identification and targeting (25%) and more on-the-job training (23%). Other suggestions included promotion of more cooperation amongst security forces, funding for acquisition of AML software/ databases, training for trainers,

collaboration with other organizations and cyber crime training. The need for cyber crime training, however, was not confirmed in the interviews.



2.1 AML/CFT Legislation developed by trained legislators and legislative personnel

While the exact information on number of countries that have adopted AML/CFT legislation is not available, according to the Global Money Laundering And Terrorist Financing Threat Assessment Report (FATF, 2010), more than 180 jurisdictions are now members of the FATF or FSRBs. These countries either already have or are in the process of adopting laws that take into account the model laws.

UN system organizations and especially GPML seem to have played an important role in the process, as number of downloads of model legislation and other related documents from the IMoLIN website would suggest (Table 6). Availability of member countries' legislations on IMoLIN/AMLID also seems to have encouraged downloads of peer national legislations. Table 7 shows the ten most popular downloads of national legislation in 2008.

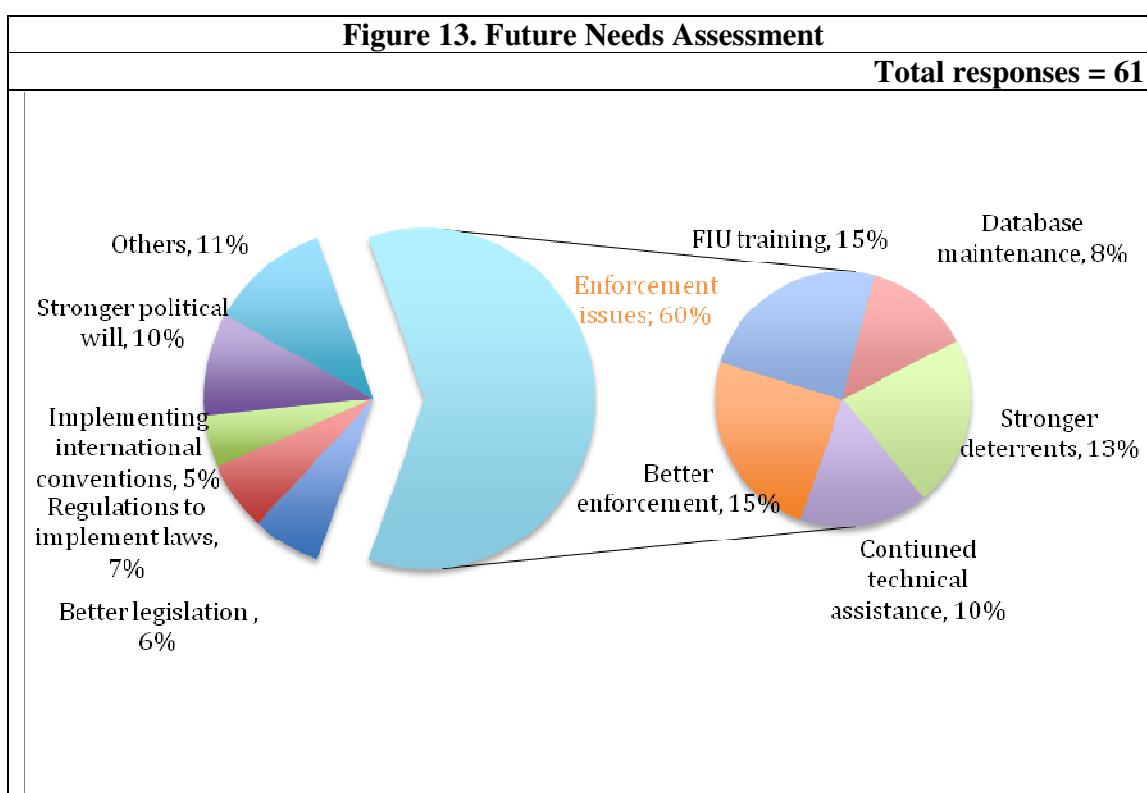
However, it is not clear who downloaded this legislation nor the use to which the downloads were put. This is important because a majority of the interviewees on field missions, as well as survey respondents (Figure 5 on page 24), claimed to be unaware of model legislation. On field missions where beneficiaries strongly attributed successful development and adoption of new money laundering laws in their jurisdictions to the GPML mentors, interviewees were largely unaware of model legislation.

While there is a need for better information collection on users, the overall evidence shows that the GPML activities, especially mentoring, did shape the development of AML legislation in targeted countries.

Table 6. Downloads on IMoLIN from 2005-2008 by Type				
Type of Download/Year	2005	2006	2007	2008
Total Downloads	22	81,236	158,077	212,174
An overview of the UN conventions and the international standards concerning anti-money laundering legislation	13	45,536	74,613	69,103
FATF 40 Recommendations	4	5,418	2,229	2,331
Money laundering and the financing of terrorism: the united nations response		8,234	7,340	9,579
Newsletters		4,524	6,119	14,068
Model Laws		0	23,085	15,969
Specific laws	5	17,524	44,691	101,124

Table 7. National legislation with the largest downloads (2008)	
Legislations:	# Downloads
1. Nigeria Companies and Allied Matters Act	1,822
2. Madagascar Code penal annexes	1,651
3. España Ley de Enjuiciamiento Criminal	1,257
4. Austria Banking Act	1,239
5. Tanzania Penal Code- Part1	1,103

6. Luxembourg Law 1993	1,022
7. Netherlands Financial Supervision Act 2006	1,015
8. Dominican Republic Ley122 2005	843
9. Luxembourg code instruction criminelle	734
10. South Africa Drugs and Drug Trafficking Act no.140 of 1992	717



2.2 Target groups participating in the project activities have a higher level of awareness on germane aspects of money laundering and the financing of terrorism

The interviewees across all field missions clearly stated that the GPML activities had significantly raised awareness on money laundering issues in their countries. In some case study countries interviewees said that prior to GPML they had no awareness at all on the issue. With significant contributions from mentors' efforts, these countries had not only increased awareness, but also had built a national consensus significant enough to pass new legislation, set up FIUs, and begin pursuing money laundering cases.

While these examples showcase success stories on awareness creation in general, the evidence also suggests areas where significant improvements can be made. Firstly, many interviewees pointed out limitations of training events in general, including limited follow-up, too general content or not really addressing the needs of the beneficiaries. In some cases, training seems to have duplicated what other technical assistance providers

had already undertaken, in spite of evidence of improved coordination. This was also one of the most frequent complaints expressed by many donors, who felt that the coordination among various assistance providers could still be significantly improved. This suggests the need for both better planning and coordination among technical assistance providers and a greater emphasis on demand rather than supply driven planning.

Second, while the project activities raised awareness about money laundering, very limited awareness on specific products and services provided by GPML was created. This was highlighted both in the interviews and the survey responses (see Figure 5). Figure 13 suggests what the survey respondents believe to be issues of relevance to them. The respondents suggested that the GPML should focus on providing technical assistance on various enforcement-related issues (60%), which seemed to resonate well with the arguments encountered on field missions. Many interviewees believe that while IMF and the World Bank had a comparative advantage in drafting legislation and working with the finance ministries, UNODC had an advantage in working with a broad range of issues pertaining to actual implementation and enforcement of laws. They also indicated that the mentors and advisors had a more hands-on approach e.g. in how to set up an FIU, how to work with prosecutors and how to train financial investigators within the police.

2.3 AML/CFT strategies and policies developed by criminal justice officials who participated in or read the reports of the expert group meetings and integrated into relevant strategies and policies

Discussions with various law enforcement and prosecution agencies suggested that many are just beginning to implement new money laundering laws. In most cases, there was very limited evidence on the implementation of any special AML strategies and policies on country level, with some notable exceptions where country counterparts had formulated a strategy for implementing recently passed AML laws and making their FIU more operational. However, creation of multilateral arrangements on regional cooperation such as the Asset Recovery Inter-Agency Network of Southern Africa (ARINSA) is perhaps the most promising development in this respect. The network, established by nine countries from Southern and Eastern Africa, was created only a year ago, but its impact has already been felt across continents as far apart as East Asia and Latin America (where also a new regional network is being set up). These networks can potentially help harmonize legislations across the region, create framework for mutual legal cooperation, and create a favorable atmosphere for investigation, detection, asset recovery and prosecution of money laundering cases.

2.4 Model AML/CFT legislation adopted by legislative bodies in Member States

In 2004, about 160 countries (83% of the world)²¹ had adopted national legislation. By 2009, this number had increased to about 180 (93%)²², and many of the remainder are in the process of adopting AML/CFT legislation. It is difficult to conclusively establish whether in the process of drafting and adopting their legislation, Member States used the GPML's model legislation or not. While Figure 8 suggests that the model legislation and

²¹ The World Drug Problem, Fifth report of the Executive Director, Addendum, Countering Money Laundering, (E/CN.7/2008/2/Add.6), 17 December 2007.

²² http://www.fatf-gafi.org/document/51/0.3343.en_32250379_32237202_45724403_1_1_1_1.00.html

other related documents have been widely downloaded, many interviewees and survey respondents were unaware of their existence. Another complication in establishing their use — or even simple linkage — is the fact that the model legislation is based on the FATF recommendations, which various other technical assistance providers including regional anti-money laundering networks (FSRBs), the World Bank, and IMF have all endorsed and advocated. However, despite these limitations, it can be reasonably concluded that whether or not the GPML mentors actually provided model legislation to beneficiaries, they appeared to have actively shaped legislation in the countries in which they worked.

2.5 FIUs established, financial investigations conducted and AML/CFT cases prosecuted with international standards applied by criminal justice officials

One hundred one (101) FIUs were members of the EGMONT group in 2005. By June 2010, 19 more FIUs had obtained membership of the EGMONT group. While it is difficult to establish causal linkages, considering that many actors besides GPML are involved in providing technical assistance on this subject, it can be safely concluded that GPML also contributed to establishing FIUs and getting them operational. There is also evidence that GPML mentors helped some FIUs in obtaining the membership of the EGMONT group.²³ For example, two countries visited for the evaluation had recently established FIUs with significant assistance from their respective mentors. In one, the mentor was currently engaged in helping the FIU at the country's central bank to devise means for identifying suspicious transactions, and the mentor in the other country was assisting the FIU and prosecution in pursuing a major case of money laundering.

A number of countries where GPML had been active had advanced to the point of investigation and prosecution of AML/CFT cases, though actual statistics on number of cases investigated and prosecuted were not available to the evaluation team.

An increasing number of countries have established FIUs, which have been admitted as members of the EGMONT group. While this is an important step towards meeting international standards²⁴ and facilitates international cooperation, the overall evidence suggests that the vast majority of countries are yet to develop fully functional AML/CFT regimes. In general the number of cases identified by FIUs in the countries where GPML operated and which were covered by the evaluation, remain very low, sometimes without any AML/CFT cases prosecuted so far. Major external factors mentioned as having a significant influence on how operational an FIU is are priority given to police, overall level of corruption and reporting of financial sector institutions.

²³ Membership in the EGMONT group significantly improves an FIU's ability to obtain information from other FIUs.

²⁴ FATF Recommendation 26 on competent authorities, their powers and resources: "Countries should establish a FIU that serves as a national centre for the receiving (and, as permitted, requesting), analysis and dissemination of STR and other information regarding potential money laundering or terrorist financing. The FIU should have access, directly or indirectly, on a timely basis to the financial, administrative and law enforcement information that it requires to properly undertake its functions, including the analysis of STR." Interpretative Note: "Where a country has created an FIU, it should consider applying for membership in the Egmont Group. Countries should have regard to the Egmont Group Statement of Purpose, and its Principles for Information Exchange Between Financial Intelligence Units for Money Laundering Cases. These documents set out important guidance concerning the role and functions of FIUs, and the mechanisms for exchanging information between FIU." (<http://www.fatf-gafi.org>)

A successful anti-money laundering system requires that there is a functional (efficient and effective) chain of agents in place. The main problems encountered in having fully functional AML measures in place, as identified by AML/CFT experts, are the following:

- Functioning FIU in place, but with limited experience or limited personnel or poor mechanisms to investigate and forward relevant suspicious transaction reports (STRs) to law enforcement.
- Lack of experience from the reporting sector (banks, other financial institutions and DNFPBs) in putting together good STRs. Further training is needed in the private sector in conjunction with the needs identified by an FIU as to what constitutes a useful STR.
- Part of the problem for an FIU can be the lack of an efficient STR tracking system, based on an IT infrastructure that is connected to the reporting institutions – hence the importance of a UNODC/GPML products such as goAML.
- Poor follow up by law enforcement: if the police cannot investigate the STRs forwarded to them by the FIU, in order to identify a case of a suspicious transaction for follow up by prosecutors, then the chain of events necessary for the AML system to function fails.
- Lack of information technology and financial investigation training at all levels, but in particular with law enforcement (and as several police interviewees mentioned, if you have to choose between an uncertain and untraceable possible case of money laundering linked to corruption of one of your political seniors, and a case of theft or worse yet, murder, then you will investigate the latter and not the former).
- At national level, the follow up of STRs from the reporting institutions, to the FIU, forwarded to law enforcement and the prosecutor before a court case with sufficient evidence can be produced, will take several months or years and presupposes a level of cooperation between the national agencies involved that is hard to find in most developing countries (and even in developed ones).
- A much heard criticism is the lack of commitment from criminal justice officials to follow up investigations. The reasons given range from lack of sufficient evidence to the realization that an investigation may implicate political figures.

2.6 AML/CFT preventive measures applied by regulatory and supervisory authorities and the private sector

There are demonstrated cases where GPML assistance led to the application of AML/CFT preventive measures. Case studies show that GPML has increasingly involved private sector (financial institutions) in their activities (e.g. mentoring, training, round tables). One example is a country where the UNODC personnel associated with GPML worked with business associations to undertake an effort at awareness-raising with the private sector. This was based on an argument that it was both a matter of corporate social responsibility and a means to avoiding over-regulation by government. Another example are roundtables, where the private sector and regulatory institutions were involved in discussions in order to lobby for a new AML/CFT law which would be compliant with international standards in terms of reporting requirements.

However, overall GPML's focus during the period under review was on supporting the drafting of effective AML/CFT legislation and on the creation of functional FIUs. Furthermore, there is not much evidence that GPML has worked with the private sector to create awareness or ensure compliance. Several countries have expressed an interest in assistance for providing training to financial institutions in their jurisdictions.

2.7 Member States are self-reliant in training their regulatory, supervisory, criminal justice, and private sector professionals

The available evidence suggests that some countries where GPML has been active have not just become self-reliant in training their professionals, but have also started using their capacity to the benefit of their neighboring countries.

In spite of these examples, interviews and survey responses suggested a need for more advanced training with a greater focus on enforcement issues and based on a model of "train the trainers" so that in-country specialists will be better equipped to provide training while tailoring it to the specific needs of that country. Interviews suggested that while countries working together in regional groups such as the FSRBs or the emerging asset recovery groups (such as ARINSA in the Southern African countries) benefitted from joint training, such training needed to be more demand driven, rather than supply driven.

Specific Objective 3: AML/CFT coordination and cooperation increased among Member States, International Organizations and AML/CFT regional bodies

A general finding is that impetus was given to anti-money laundering programmes in the last years through the revision of the FATF Recommendations, the new explanatory notes to the 40 + 9 FATF Recommendations, the EU implementation of the 3rd AML Directive, the new Council of Europe 2005 Warsaw Convention and that this resulted in increased coordination and cooperation. In different fora, from the United Nations to more regional groups, including but not limited to the OECD, Council of Europe, the European Union, and FSRBs, there is a perception that money laundering can only be tackled as a global problem by effective global cooperation. The new international standards have stressed the need for cross-border and global cooperation and coordination.

With regard to GPML's expected outcomes, the evaluation found the following.

3.1 Increased Number of technical assistance coordination meetings, and results thereof.

There is evidence that GPML mentors participate in technical coordination meetings organized by FSRBs like the APG, at the invitation of those bodies. Partner organizations and other providers of technical assistance confirmed that mentors put a focus on sharing information on their activities in a country and region, to enable cooperation (e.g. through newsletters, bilateral meetings), and several partners stated that they consider this information when designing their own activities and selecting focus countries.

GPML also organizes annual meetings in Vienna, where mentors and GPML staff meet to coordinate technical assistance internally. One concrete example of mentors

cooperating and discussing issues informally is when they are asked to give input to GPML policy papers, such as the input given to FATF recommendation 38 on asset sharing for the FATF 2010 Plenary best practices paper.

Most coordination is informal rather than through formal meetings. The evaluation found a greater need to coordinate what is being done by each region, by each mentor and the GPML guidance thereof from Vienna. Based on interviews there is also a perceived lack of sufficient coordination between the activities of GPML and the World Bank and IMF, as well as of other donors working on individual technical assistance activities in the field of AML/CFT.

3.2 Exchange of information and AML/CFT coordination among international organizations improved

There is evidence of some improved coordination between GPML and the World Bank in particular, especially because of the two joint mentors, who are paid by and report to both organizations. In meetings, they usually act as UNODC/World Bank focal points for AML/CFT and most coordination on AML/CFT between the organizations in their areas is done by them. However, there has also been some cooperation between GPML headquarters and the World Bank on publications and in connection with the StAR Initiative, even though the Corruption and Economic Crime Branch (CECB) of UNODC is the designated counterpart to deal with the World Bank. Though the World Bank and IMF are also active in the field of AML/CFT, they usually rely on specialized staff sent from headquarters, not duplicating GPML's mentoring structure and efforts. Overall, in spite of the two joint UNODC/ World Bank mentors, cooperation between GPML and the World Bank has so far remained activity based and rather informal. Cooperation with the IMF has taken place on an even more informal basis, even though there are plans for a more formalized and regular exchange. The evaluation found that while there are visible efforts and increased cooperation, the level of institutionalization of the cooperation is still very low.

With regard to the EGMONT Group of FIUs, GPML participated in or provided input to several working groups within EGMONT, e.g. on training, outreach and information technology. Cooperation took place on a regular basis and included reviews and provision of comments on training material as well as joint training. GPML is an observer to all FSRBs and to FATF and participates in the International Cooperation Review Group, the Working Group on money laundering and the Working Group on terrorist financing and money laundering. In connection with Interpol and CTITF, GPML participated in the working group on proceeds of crime.

At the meetings of the FSRBs such as APG, EAG, GIABA, ESAAMLG and GAFISUD international and regional organizations take the opportunity to meet and exchange information. Because of the nature and organization of the Financial Action Task Force (FATF), the different international organizations meet at least at the annual FATF meetings in Paris and can meet and do ad hoc or incidental coordination of AML/CFT activities. However, the FATF is not the best-suited forum for coordination because of very full meetings devoted to its own work.

GPML aimed at a regular representation at the relevant meetings, if funds were available, and actively participated in coordination activities at the margins of the meetings.

In addition, mentors/advisors sought improved cooperation through means such as newsletters and bilateral meetings with other providers of technical assistance in their region.

Field mission observations showed that GPML headquarters staff and mentors were known personally to a wide range of representatives of partner organizations involved in AML/CFT, both on the regional and international level. In addition, their networks and contacts were frequently mentioned as a valuable resource and particular value added.

However, if all relevant international organizations are considered, coordination is still not as effective as desired. The World Bank and IMF have a specific agenda which is matched only incidentally with the GPML projects, and the European Union and other regional organizations have a different perception of their tasks in combating AML or CFT and therefore do not cooperate with GPML.

3.3 New mechanisms developed for facilitating international cooperation that use project outputs

The GPML team was involved in the development of at least three new mechanisms: ARINSA in Southern Africa, its equivalent in South America and a new financial investigations course.

There has been further development of the goAML and goCASE products of UNODC's Information Technology Services, which have been promoted jointly with GPML and, in the case of goAML, developed with GPML inputs. These products enable the facilitation of processing information gathered on AML, both quantitative and qualitative data, and can be unique tools to improve international exchange of information on STRs.

GoAML provides an information technology (IT) solution for Financial Intelligence Units. Although limited to FIUs with sufficient resources for maintenance, the costs are considerably lower than of comparable commercial software solutions and since 2004 goAML has been installed in eight countries in various regions. GoAML was independently evaluated in 2008 (see the executive summary of this evaluation in Annex F) The software has been presented in a number of forums, such as the EGMONT Group, where GPML is the main representative of UNODC.

As goAML was developed to address the needs of FIUs and has been found to be a suitable solution to the needs of FIUs, supported by the evidence in this GPML evaluation, it is expected that its further development will enhance cooperation of FIUS at the international level.

Reference was made by FIU.NET²⁵ in relation to goAML and the Egmont information exchange network 'Egmont Secure Web':

²⁵ <http://www.fiu.net/>

FIUs in the European Union also use FIU.NET to share information, to conduct analysis and to collaborate with each other. Compatibility between FIU.NET, Egmont Secure Web and GoAML is essential to enhance the effectiveness of international cooperation. In the IT Working Group of the Egmont Group, FIUs, GoAML and FIU.NET look after that compatibility.

3.4 Increased number of inputs to FATF and other standard setters' AML/CFT papers, reports and studies that are used by the FATF and other Standard setters

There is evidence that the FSRBs recommend the use of documents produced by the GPML team and that these are downloaded from the GPML website. However, it is not clear who is downloading these documents and for what use. This is a critical issue because a vast majority of the interviewees did not appear to be aware of their existence. In other words, there is little evidence to suggest a causal link between the documents generated and their use by the targeted beneficiaries.

3.5 Increased Number of joint projects and initiatives with the FATF and other standard setters

Since 2004 several joint training events were conducted with partner organizations, including IMF, World Bank, the Organization for Security and Cooperation in Europe (OSCE), the EGMONT Group, Interpol and the United States Treasury.

There is evidence that joint training projects have taken place in particular in cooperation with the World Bank but the extent to which this represents an increased number of initiatives needs to be verified with baseline data. Since the World Bank and the IMF have become interested in joint training over the evaluation period, this suggests that there has been an increase. Interviews showed that the partners valued the role of GPML in organizing and staffing the projects and initiatives and especially the contributions of GPML advisors and mentors.

A major partner of GPML is the Financial Action Task Force (FATF), to which UNODC, through GPML, has been an observer. There is evidence that GPML work has affected how the FATF has developed and modified its recommendations that are used as the basis for assessing whether countries are taking the necessary actions on money-laundering. Both interviews and observations show that GPML mentors' reports and headquarters staff interaction at FATF meetings have influenced FATF standards and their application.

3.6 The FATF-Style Regional Bodies (FSRBs) as the platforms for technical assistance coordination utilized

Even though FSRB meetings are highly relevant and usually serve as a forum for exchange between different technical assistance providers and member countries, as detailed above, the FSRBs are still formally underutilized as the ideal platforms for technical assistance coordination. There usually are severe limitations to developing a strategic plan in response to their members' needs for technical assistance and training:

Even if these needs are identified (e.g. in a needs matrix²⁶), the provided technical assistance is not necessarily sufficiently demand -driven and is often based on a supply-driven offer of technical assistance without sufficient relevance to the real needs of the FSRB region. The evaluation found that this is less true for mentoring activities, as GPML mentors were usually represented at the FSRB meetings of their region and well aware of beneficiary needs through their close interactions with them in the respective countries.²⁷ Their flexibility allowed them to quickly respond to the needs, which was mentioned by many partners and beneficiaries as a comparative advantage of GPML.

3.7 Working group on “Tackling the Financing of Terrorism” uses inputs

GPML was called upon to be one of the authors of the CTITF Working Group report on Tackling the Financing of Terrorism issued in 2009. Whenever the working group meets, it expects GPML staff to participate.

3.8 Increased use by CTITF of inputs provided

The formal representation of UNODC on the CTITF is provided by the Terrorism Prevention Branch. GPML has participated whenever the issue of terrorist financing has been taken up.²⁸ As noted above, the CTITF Working Group Report ‘Tackling the Financing of Terrorism of 2009’ is an excellent report gathering findings and recommendations related to the financing of terrorism made by a range of experts across a variety of sectors and communities involved in combating terrorism financing and was prepared with input from GPML.

C. Institutional and management arrangements and constraints

In the field, the mentors, who are actually hired out of Vienna, have to maintain a strong working relationship with UNODC regional offices. There is a dynamic tension between the needs of Vienna headquarters and the regional offices. In some cases, this has meant pressure on the mentors to not only focus on their GPML related AML/CFT mandates but to contribute to other regional priorities of the field offices. One of the key functions of UNODC headquarters is to ensure quality control of field level activities and that there is full understanding of what is happening in the field and its implications for broader policy. The evaluation found that GPML headquarters staff proactively reached out to internal partners, but that the level and quality of cooperation with field offices and other sections of UNODC headquarters varied. Examples of very effective cooperation include joint products and activities, reviewed and joint proposals and mutual promotion of activities, e.g. of GPML and country offices. There are various examples of good

²⁶ Examples of FSRBs with a needs assessment mechanism are the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) and the Asia/Pacific Group on Money Laundering (APG)

²⁷ At the FSRB plenary meetings GPML staff members and mentors conduct or attend in specific meetings with beneficiaries and other technical assistance providers in order to ensure coordination and to avoid a duplication of efforts.

²⁸ The Counter-Terrorism Implementation Task Force, a coordinating and information-sharing body consisting of 25 entities from the United Nations system and other international organizations, established a Working Group on Tackling the Financing of Terrorism to assist States in this regard. The Working Group is led by the International Monetary Fund (IMF), the World Bank and the United Nations Office on Drugs and Crime (UNODC), and supported by the Monitoring Team of the 1267 Committee (MT), the Counter-Terrorism Committee Executive Directorate (CTED) and the International Criminal Police Organization (INTERPOL).

cooperation between GPML, mentors and staff at headquarters, and UNODC field offices. If a well-designed regional programme in which AML is included was in place, it particularly supported the cooperation by providing a programmatic basis for effective collaboration. However, there are also examples of insufficient cooperation, which have led to a lack of awareness and consequently input of GPML. One example is an AML project designed by a country office, which GPML was not informed about and which was submitted to the same donor as a project proposal supported by GPML, resulting in a reduction of UNODC credibility. In this connection the evaluation concluded that there is insufficient internal policy guidance to guarantee full involvement of GPML in AML/CFT project designs, leading to a risk of inconsistencies and an underutilization of specialized expertise within UNODC.

Field representatives are first reporting officers of GPML mentors. Although these reporting lines strengthen the information flow between mentors and field offices, there are limitations related to the field representatives' performance appraisal and oversight function, given the fact that they are not AML/CFT specialists and that mentors receive strategic guidance and funding from HQ/GPML. While mentor activities need to be integrated into country and regional planning, they also have to be aligned with GPML's strategy, work plans and mentors' terms of references. There is a risk that field representatives, in the absence of a regional advisor on AML/CFT, utilize the expertise of a mentor for other functions than providing specialized in-depth AML/CFT capacity development in the countries. Improved and more formalized communication structures are needed, rather than the current model of reporting lines, in order to guarantee that field representatives are aware of GPML's strategy, products, services and particular activities of the mentors in their region, while GPML is informed about AML/CFT related projects in the field. At the same time GPML at headquarters needs to be in a position to provide strategic guidance and oversight, performance appraisal of the programme's mentors, as well as quality assurance and consistency of AML/CFT related projects.

At Vienna headquarters, GPML has been affected by a long series of reorganizations and realignments. The evaluation found that the current focus on regional programmes and decentralization has resulted in significant pressure on thematic programmes, in particular global programmes like GPML, and a risk of eroding headquarters-based expertise, for which the field office based specialists are not in a position to compensate. This is also true for functions like collection and distribution of information and global coordination for consistency purposes and quality assurance, which require a centralized approach.

AML was initially included in the international conventions that deal with illicit trafficking in drugs and was thus associated more with that aspect of UNODC's work. It was not taken into account as strongly in work on crime prevention and criminal justice. Subsequent conventions on corruption and organized crime, however, have included significant AML elements, and work on combating terrorism also includes AML in the context of financing of terrorism. Today the cross-cutting nature of AML/CFT is widely recognized and also reflected in the fact that anti-money laundering cuts across all of the three major international conventions for which UNODC is responsible. As a result GPML is difficult to place organizationally, because the current organizational structure

of UNODC is very much based on a division by conventions. Originally part of the Division for Operations, since GPML was considered to be a technical assistance programme, it is now organizationally located in a section of the Division for Treaty Affairs, within the specialized branch that deals only with organized crime. This decision was made based on the fact that the largest amounts of laundered money derive from organized crime activities. However, other branches (Terrorism Prevention Branch and Corruption and Economic Crime Branch) also deal with conventions with significant AML dimensions. One consequence of making GPML part of a section in the Organized Crime and Illicit Trafficking Branch has been to reduce its formal ability to link with other sections at headquarters and field offices. Cooperation between GPML and other branches, as well as field offices, typically remained informal, with an inherent strong dependency on personal relationships. Although there are examples of very successful communication and cooperation, e.g. with the Terrorism Prevention Branch, other examples show that GPML's expertise and networks are at a risk of being underutilized. This is particularly true for the area of asset recovery, where GMPL has invested significantly in networks like ARINSA in Southern Africa.

Overall, the broad visibility of GPML within UNODC has clearly been lost. For example, in the Strategic Framework for the period 2012-2013 just approved by the General Assembly at its 65th session, money laundering is reflected only in Subprogramme 1 (Countering transnational organized crime and trafficking), where one of the expected accomplishments (outcomes) is

- (b) Member States are equipped to take effective action against transnational organized crime, including: drug trafficking; money laundering; trafficking in persons; smuggling of migrants; illicit manufacturing and trafficking of firearms; and emerging crimes

The strategy for obtaining this outcome, however, does not include a reference to money-laundering.

In the other subprogrammes, the expected accomplishments are “improved capacity of Member States” to implement the respective conventions but their strategies are generic rather than specific:

“Providing assistance to Member States, upon request, to enhance the capacity of national competent authorities and strengthen their integrity through various forms of technical cooperation, including knowledge transfer, training and advisory services.” (Subprogramme 2 on Countering Corruption)

and

“ Strengthening the capacity of national criminal justice systems to apply counter-terrorism legislation in conformity with the rule of law and in pursuance of the United Nations Global Counter-Terrorism Strategy and the relevant Security Council resolutions by providing sustained, long-term and in-depth assistance.” (Subprogramme 3 on Terrorism Prevention).

Clearly, in that dealing with money-laundering is one element in how national authorities and criminal justice system address issues of corruption and terrorism, the strategies imply that the kind of assistance that GPML has provided is relevant to these subprogrammes. The Salvador Declaration on Comprehensive Strategies for Global Challenges: Crime Prevention and Criminal Justice Systems and Their Development in a Changing World , to which GPML helped contribute a paper, stated (General Assembly resolution 65/230, Annex):

“22. We emphasize the need for the adoption of effective measures to implement the provisions on preventing, prosecuting and punishing money- laundering contained in the United Nations Convention against Transnational Organized Crime and the United Nations Convention against Corruption. We encourage Member States to develop strategies to combat money-laundering based on the provisions of these two Conventions.”

Despite being absent from the strategic framework sent to the General Assembly, GPML has been recognized as an important element in crime prevention by the General Assembly which, in its resolution 64/179 on Strengthening the United Nations Crime Prevention and Criminal Justice Programme, in particular its technical cooperation capacity:

“8. *Urges the United Nations Office on Drugs and Crime to continue providing technical assistance to Member States to combat money-laundering and the financing of terrorism through the Global Programme against Money-Laundering*, in accordance with United Nations related instruments and internationally accepted standards, including, where applicable, recommendations of relevant intergovernmental bodies, *inter alia*, the Financial Action Task Force on Money Laundering, and relevant initiatives of regional, interregional and multilateral organizations against money-laundering.”

The 65th session of the General Assembly on 23 November 2010 adopted resolution 65/323 on Strengthening the United Nations Crime Prevention and Criminal Justice Programme, in particular its technical cooperation capacity which stated:

“14. *Urges the United Nations Office on Drugs and Crime to continue providing technical assistance to Member States to combat money-laundering and the financing of terrorism through the Global Programme against Money-Laundering*, in accordance with United Nations related instruments and internationally accepted standards, including, where applicable, recommendations of relevant intergovernmental bodies, *inter alia*, the Financial Action Task Force on Money Laundering, and relevant initiatives of regional, interregional and multilateral organizations against money-laundering;”.

The evaluation found that while GPML is a recognized “brand name” outside of UNODC headquarters, it does not seem to have a priority inside headquarters. Interviews with partner organizations suggest that one reason is that money laundering is a highly technical field, which can easily be eclipsed by more dramatic sounding concepts such as asset recovery in the context of the Convention Against Corruption, or counter-terrorism.

GPML functions most effectively through working with partners. International work is based on a strong network of professionals in different organizations. Networking has been effective, in part because many of those working in partner organizations either were part of or worked directly with GPML over their careers. The interviews suggest that many of the staff in these partner organizations consider GPML to be their natural counterparts in UNODC. The fact that a number of partners now are expected to work with different counterparts in UNODC is having consequences in that the accumulated knowledge and experience of GPML is not being used systematically by the partners.

The small size of GPML, coupled with its subsidiary position inside the UNODC organizational structure, within the Implementation Support Section of the Organized Crime and Illicit Trafficking Branch of the Division for Treaty Affairs, has in effect been a constraint to GPML in terms of acting as focal point for partners, planning coherently and consistently, obtaining extra-budgetary resources and ensuring that there is effective monitoring and quality assurance of field activities.

V. CONCLUSIONS

GPML has successfully contributed to the achievement of the outcomes in the project document's logical framework, through a wide range of activities and outputs. The evaluation found that GPML also contributed to long-term impact, which can be observed in the form of AML/CFT laws compliant with international standards, operational FIUs and, to a more limited extent, AML cases followed up by law enforcement and being prosecuted. In many countries where the programme was active, there was evidence that the results will be sustainable. That is especially the case in connection with contributions to laws and structural changes (establishment of an FIU) in a country. The evaluation found that the highly appreciated and effective mentoring system of GPML constitutes a significant comparative advantage of GPML and UNODC technical assistance.

GPML's strength lies in its ability to assist governments by providing practical assistance and tools, particularly for law enforcement agencies and FIUs. Training is particularly crucial in the area of law enforcement. Law enforcers need to know how to conduct financial investigations, as well as create new synergies and modes of cooperation between reporting agencies, FIUs, police, prosecutors and judges, supervisors and regulators. Similarly, international cooperation is needed to tackle money laundering and countering the financing of terrorism. GPML proved to be well aware of that and promoted inter-agency cooperation within a country, as well as international cooperation, while also providing specialized training to improve skills relevant for AML/CFT.

In accordance with recommendations of the 2004 evaluation (Annex D), the programme focused on cooperation with various relevant partners and the promotion of multidisciplinary inter-agency cooperation within the countries, with visible success. This holistic approach is very relevant and essential for the implementation of effective AML/CFT measures. It also enables the identification of mentors and experts with the necessary expertise, through an extensive network of contacts maintained by GPML at headquarters over several years.

The 2004 evaluation had made eight recommendations and identified four additional actions and decisions to be taken. Eight of these twelve recommendations and issues, mostly the ones related to improving partnerships, were implemented or addressed to some extent, while key recommendations related to increased core funding and long-term strategic planning were not implemented and remain major areas of concern. The current evaluation also showed that even more focus needs to be put on better publication of the global accomplishments of GPML.

The areas of concern identified in this evaluation include institutional arrangements related to the visibility of GPML and its coordination and quality assurance function, challenges to provide secure funding, and the lack of a detailed strategic plan. There is a clear need for a coherent, consultative planning process to ensure that progress is both sustained and increased and results are measured. In this connection the key recommendations of the earlier evaluation still need to be addressed. This particularly refers to the need for a detailed strategic plan and for more long-term and stable funding, but also to the need for better promotion and publication of products and services of GPML, within and outside of UNODC. This issue is also related to a lack of readily available and systematically collected results data, particularly on the outcome level.

A. Outcomes, Impact and Sustainability

Outcomes

GPML is fully established as one of the international public sector's main institutions to address money-laundering. The system of long-term advisors and mentors in key regions is highly regarded by partner institutions and is a main added value of UNODC. The AMLID database is a main resource on legislative and procedural developments, and the policy reports submitted to the Commission on Narcotic Drugs have demonstrably helped that body reach agreements.

Without exception, the system of long-term advisors and mentors was noted by partners, including FSRBs and donors, and national counterparts and beneficiaries as effective. The placing of long-term advisers in the regions, where they could work within national political contexts while conveying international norms and best practices, has been highly successful despite significant resource constraints. Though progress was more evident in key countries of activities, it was not limited to the countries where mentors were based.

As a part of the United Nations, the advice of GPML advisors and mentors had a greater perceived credibility and independence than those who might come from bilateral agencies or even the Bretton Woods institutions.

In addition the GPML website (IMoLIN) and legislation related database (AMLID) are used by a wide variety of individuals and institutions.

Impact

The GPML has been in operation for over ten years. The number of countries that have adopted AML legislation, established FIUs and begun to enforce laws against money-laundering has increased. The evaluation confirmed GPML's contribution to the progress

in many of its countries of operation, with some clear linkages between the work of advisors and mentors and the AML/CFT progress in the countries, as identified by beneficiaries and counterparts, as well as regional organizations.

The evaluation was able to establish some clear linkages between the assistance from mentors and tangible progress in countries where GPML was active, e.g. first restraint orders or first complex AML cases being prosecuted in countries where mentors had significantly contributed to drafting, presentation to Parliament, and adaptation of AML/CFT legislation, based on the GPML-developed model law, and the establishment of an operational FIU. For several countries in different regions all interviewed parties confirmed that without the mentors and the assistance they provided, a functional AML system in their countries would not yet be in place.

The experience of the GPML advisors and mentors, as well as the GPML staff at UNODC Headquarters, has affected international policies and standards of AML, including the implementation of recommendations adopted by the FATF especially by the regional and subregional FSRBs.

Sustainability

In those countries where functioning AML institutions have been created and legislation adopted, the results of GPML work are sustainable. This includes areas such as the Pacific, Central Asia and Southern Africa, where FIUs and law enforcement systems work successfully. Some countries appeared to have reached a stage where they not just require no further GPML support, but are also able to assist other countries in their respective regions.

In other areas, the main constraints are financial and in terms of human resources or infrastructure, including IT systems. While GPML has benefited from continuous donor support, the number of donors has been declining, leading to concerns about future funding. Only one GPML post is funded from the regular budget of the organization and all others are funded from extra-budgetary resources. Much of its recent work has been dependent on a single donor, the United States, which continually reviews its priorities and has tended to programme on a one-year basis. There has been little effective central fund-raising. Instead, fund-raising has been project-based, requiring considerable work in preparing smaller project related proposals. Considerable time of central staff has to be spent on preparing project proposals, monitoring reports and other documentation required by individual donors.

The unpredictability of the GPML funds was strongly criticised in many interviews, not merely because the donors do not give longer term funding, but because the administrative and bureaucratic handling of the programme from UNODC headquarters is not based on any kind of predictable long-term strategy.

The evaluation found that a detailed strategic plan with prioritization, that goes beyond a definition of objectives, outcomes and outputs in the logical framework of the programme, does not exist, even though the creation of such a plan was recommended in the 2004 evaluation. UNODC has done some strategic planning, most recently in the

Strategy for the period 2008-2011 for the United Nations Office on Drugs and Crime that was adopted by the Commission on Narcotic Drugs and the Committee on Crime Prevention and Criminal Justice in 2007. This, however, had only a small element of money-laundering. AML has been included in the UNODC Regional Programme Framework for the Regional Centre for East Asia and the Pacific (2009-2012) and this could be linked to a UNODC-wide strategic plan for money-laundering.

Lastly, several interviewees suggested that while a considerable success had been achieved in getting the requisite legislation passed, they now needed technical assistance in dealing with the actual enforcement issues. Support for police and law enforcement agencies was one of the most consistently cited needs for the success of newly legislated money laundering regimes in the immediate future.

B. Lessons Learned and Best Practices

Lessons learned

The mentoring system is a very effective means of ensuring that governments implement successful programmes to combat money-laundering. For the system to work well, however, it needs a combination of headquarters substantive support, adequate resourcing and coordination with other programmes and projects at both national and regional levels. There is a dynamic tension between the field's need for flexibility and the headquarters need for coordination and oversight. Where this has been provided, the results are evident; where it has been inadequate, the role of UNODC has been reduced.

One key lesson in connection with the mentoring system is that there is a major need for technical assistance once the national legislation and information collection systems are in place. It is at this point that law enforcement and inter-agency cooperation becomes the most important priority and the types of assistance to be provided are increasingly technical. GPML has a comparative advantage with regard to that type of technical assistance.

There is a considerable body of knowledge emanating from the field that does not necessarily feed back into the system or get translated into general policy prescriptions. One major challenge is to determine how to record and translate practical knowledge derived from GPML activities into a policy learning curve.

Another lesson learned is that the results of institutional challenges, as noted earlier, can have a very negative impact at the national and regional level, even more so if the limitations and their reasons are not communicated timely and in detail. One example is a training course for law enforcement training in a country, which was suddenly cancelled by GPML headquarters, as were other projects prepared by mentors, jointly with counterparts and beneficiaries. This created the impression among beneficiary countries that their serious requests for a particular training were disregarded and neglected, especially because the reasons were not obvious to the stakeholders in the country.

Best practices

A clear message from the interviews in all regions – as stated elsewhere in this report – is the invaluable role played by GPML’s long-term advisors and mentors in the regions, with mentors being highly appreciated not only for their specific expertise, but also for their diplomatic and communication skills and networks.

In addition, GPML is a very good example of the importance of networks in a specialized technical field. GPML long-term advisors and mentors are usually identified and selected by GPML headquarters, by making best use of the global network of contacts and experience built up and maintained over several years. Similarly, the role of mentors includes the much appreciated identification of additional experts (e.g. common law experts) for follow up beyond the scope of GPML in a particular country.

GPML’s global approach enables the identification of expertise and best practices beyond the national or regional level, which is particularly important in the field of AML/CFT. One best practice example with particular potential and relevance for other regions is the establishment of the regional asset recovery network now known as ARINSA, which GPML was instrumental in. Beneficiaries/ counterparts and partner organizations unanimously and highly appreciated the role played by the mentor, which included bringing in the right experts and his own personal contacts at government level in the countries that joined ARINSA.

The “prosecutor placement programme”, one focus area of GPML, can be considered a best practice model, which is crucial for success with cases of asset forfeiture and asset recovery. This type of placement or internship programme has had significant success where it was introduced and is a unique form of technical assistance, which could be expanded e.g. to exchange financial investigators or FIU staff.

VI. RECOMMENDATIONS

The holistic approach to fighting money laundering and financial crime in all its ramifications, which GPML pursues, should not be based on ‘short-termism’. Long-term funding and strategic planning will be essential to further increase the programmes effectiveness and efficiency.

Beneficiary countries should pool their needs for specific training and infrastructure (IT and other) and centralise these requests, in order for GPML to define strategic global and regional priorities and more targeted and demand driven technical assistance. This approach would also foster UNODC’s regional programming.

Based on the findings and the conclusions drawn from them, the following specific recommendations should be considered:

1. UNODC’s senior management should continue the programme and give it more priority, in order to make best use of its developed reputation, networks and experience, and the comparative advantage of a United Nations programme, which is perceived as a global player and as more impartial and aware of regional characteristics than other AML/CFT technical assistance providers.
2. UNODC’s senior management should consider the cross cutting nature of AML/CFT and the limitations resulting from the positioning of GPML under one of the convention related branches, and take steps to ensure its organizational visibility and its ability to provide assistance to other conventions and effective centralized quality control of AML/CFT related UNODC projects.
3. GPML should prepare a long-term strategic plan for the period 2011-2015, in coordination with senior management and in consultation with relevant UNODC sections at headquarters and in the field. Human and financial resources needed to implement the plan, as well as future modalities of key stakeholder involvement, should be clarified. The strategic plan, once agreed, should be consulted with donors.
4. GPML should sustain and intensify the ‘mentoring programme’, with mentors or long-term consultants servicing several countries in a region, while ensuring that the number of countries covered by each mentor or long-term consultant allows for longer periods of time in each country, and for a focus on countries where law enforcement is the priority. The detailed planning should be based on the long-term strategic plan and should include provisions for headquarters’ quality control.
5. UNODC’s senior management should aim at a sufficient long-term core funding for GPML, if possible from the regular budget of the organization, in order to ensure the sustainability of the programme and its ability to adequately manage the global aspects of AML/CFT, as well as ensure coordination, quality control and consistency for UNODC’s AML/CFT activities in the field. To the extent that funds can be provided from the regular budget of the United Nations, this should be included in the budget proposals for 2012-2013.

6. GPML and UNODC field offices should continue to focus on increased and more formalized communication to ensure regional integrated programming, as well as quality control and consistency of all AML/CFT related UNODC projects. Regional advisors for AML/CFT, jointly funded by GPML and Regional Offices, should support coordination and programming, while GPML mentors should continue to focus on in-depth AML/CFT capacity building in selected countries. Clear and effective reporting structures need to be set up between mentors and UNODC offices in the field and GPML headquarters, ensuring that field representatives are kept informed and GPML can carry out its oversight function.
7. UNODC's senior management should designate GPML as a formal point of contact for partner entities like World Bank and IMF, for all AML/CFT related matters, including corruption, asset recovery and terrorism prevention, in order to ensure that GPML is informed about and able to contribute to initiatives relevant to AML/CFT.
8. GPML should put more focus on promoting its various valuable products, like tools, publications, the IMoLIN website and AMLID database, as well as its AML/CFT Computer Based Training, and should continue to jointly promote the goAML software for Financial Intelligence Units developed by UNODC's Information Technology Service.
9. GPML should use its strategic plan for the period 2011-2015 as the basis for acquiring and recording results data more systematically. It should ensure that all relevant information, particularly on outcome level results related to its activities, is readily available for coordination, oversight and knowledge management. This information should also include a database of all counterparts/beneficiaries and partners, and mentoring related lessons learned.
10. GPML should continue to proactively seek to improve coordination among technical assistance providers through measures like newsletters, bilateral meetings and joint activities and, in addition, through a more formalized cooperation with partner organizations and lobbying for the institutionalization of meetings for technical assistance providers and beneficiary FIUs in order to coordinate, harmonize and finalize their assistance plans in the margins of FATF, Egmont Group and FSRB meetings.
11. GPML should identify centers of excellence and best practice examples in all regions and use its 'prosecutor placement programme' as a model for fostering learning and networking between various law enforcement agencies, including Financial Intelligence Units, of different countries and regions and for improving cross-border cooperation.

VII. OVERALL CONCLUSIONS

GPML has a very important role to play in addressing the larger problems of drugs and crime. As part of UNODC and the overall United Nations structure, the programme has the great advantage that it is generally seen as a global and impartial United Nations-led programme with a strong practical focus, particularly on law enforcement. GPML has better access to some countries where other technical assistance providers may not be represented or not well received. All of these advantages, as well as the programme's results, networks and experience, built up over years, justify a continuation and increased support of the programme, which also relates its visibility and position within UNODC. Money-laundering should not be put in a box but rather be used as the overarching, cross-cutting tool to take the money out of crime, not limiting it to whether it is derived from drugs, trafficking, corruption or any other number of crimes. However, in order to live up to its full potential, GPML will need to address the lack of a long-term strategic plan, a recommendation of the 2004 evaluation as well as this evaluation, which should be developed in conjuncture with all relevant stakeholders, especially within UNODC.

VIII. ANNEXES

A. *Short biographies of the external evaluators*

John Mathiason is Managing Director of Associates for International Management Services, a consultancy specialized in results-based management with an emphasis on evaluation. He is also Professor of International Relations at the Maxwell School of Citizenship and Public Affairs of Syracuse University, where he teaches graduate courses on evaluation of international programmes and projects and on management of international organizations. He was a career staff member of the United Nations Secretariat from 1971-1997 and since then has consulted widely on results-based management with organizations of the United Nations system, bilateral donors and non-governmental organizations, including UNODC.

Punit Arora is a strategy and financial economics professional. He has over 15 years of experience in strategic positions with governmental, business and international organizations. Most recently, he has advised the Swedish International Development Agency, United Nations and its specialized agencies, and other international organizations like the African Economic Research Consortium and Tanzanian National Commission for Science & Technology on results-based strategic planning and outcome evaluation. He is both a Chartered Financial Analyst and a Certified Fraud Examiner, and is shortly expecting a PhD in Strategic Management/ Business Economics from Syracuse University. He has also advised several business organizations on strategy, business process reengineering, corporate governance, and innovation and change management.

Adriana Holtsga-Alvarez is an independent consultant in EU financial services policies based in The Hague (NL) and for the last five years has been an external consultant to European Bank for Reconstruction and Development for anti-money laundering seminars for Russia and a consultant for the Council of Europe Economic Crime Division. Since ten years, she is the Senior Visiting Lecturer in EU Financial Services for the European Institute of Public Administration (Maastricht) and organizes seminars on EU Banking and Financial law, Corporate Governance, Anti-Money Laundering and Financial Crime, and EU Competition issues in relation to financial services. She is a former Member of Management Committee in European Savings Banks Group/World Savings Banks Institute, Brussels, with responsibilities for the legal and economic department and EU lobbying. Previously she spent three years at the European Court of Justice (Luxembourg) in chambers of Advocate General Baron van Gerven (B); formerly a lecturer in European Law at the University of Maastricht.

B. List of acronyms

AML	Anti-Money Laundering
AMLID	Anti-Money Laundering International Database
ARS	Alternative Remittance Systems
ARINSA	Inter-Agency Asset Forfeiture Network in Southern Africa
CARIN	European Camden Asset Recovery Inter-Agency Network
CFT	Countering the Financing of Terrorism
CTED	Counter-Terrorism Committee Executive Directorate
CTITF	Counter-Terrorism Implementation Task Force
DNFPBs	Designated Non-Financial Businesses and Professions
FIU	Financial Intelligence Unit
FSRB	FATF-Style Regional Body
FATF	Financial Action Task Force
GLOB79	UNODC Project/Global Programme B79 (GPML 1997-2009)
GLOU40	UNODC Project/Global Programme U40 (GPML 2008-2012)
GPML	Global Programme against Money Laundering
IMoLIN	International Money Laundering Information Network (GPML website)
ITS	UNODC's Information Technology Service
IMF	International Monetary Fund
INTERPOL	International Criminal Police Organization
NPO	Non-Profit Organization
UNODC	United Nations Office on Drugs and Crime
UNOPS	United Nations Office for Project Services
UNOV	United Nations Office at Vienna
WG	Working Group

C. Terms of reference of the evaluation



Evaluation of The Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML)

Terms of Reference

as of 2 Aug 2010

I. BACKGROUND INFORMATION

Project title:	Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) (1997-31 st March 2008: Global Programme against Money Laundering)
Project number:	GLOU40 (2004-31 st March 2008: GLOB79)
Duration:	GLOU40: 1 April 2008 – 31 March 2012 (1997-31 st March 2008: GLOB79)
Location:	Global
Executing agency:	UNODC / Associate Agency: UNOPS (United Nations Office for Project Services)
Total approved budget:	GLOU40: TOTAL: US\$ 10,012,620
Donors:	GLOU40: Canada, France, Ireland, Italy, Liechtenstein, Luxemburg, Sweden, United Kingdom, United States of America.

Period of GPML evaluation:	June 2004 – June 2010
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1.1 UNODC Mandate and Project Overview

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

GPML focuses on these objectives and functions as an ongoing 'rolling' project, with a biennial budget and harbours a drugs and a crime component.

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

Since April 2010 and a recent restructuring of UNODC divisions, GPML was placed in the Division for Treaty Affairs (DTA), Organized Crime Branch (OCB), Implementation Support Section (ISS). Although the Programme falls now under the overall supervision of the officer-in-charge of DTA, there was no change of first and second line management.

1.2 Project Documents and Revisions

The original project (GLOB79: 1996-31st March 2008) was substantively revised in 2007, when a first detailed results framework (Logical Framework) was added. For the successor project (GLOU40: 1st April – 31st March 2010) the framework was revised with the support of UNODC's Strategic Planning Unit (SPU) with a view to meeting the UNODC's standards.

Since the inception of the new project GLOU40 in March 2008, GPML has undergone several project revisions, only one of which was substantive and resulted in an extended duration of the programme (1 April 2008 - 31 March 2012). In addition, the revised document refers to staffing and budget changes in connection with the Law Enforcement Organized Crime and Anti-Money-Laundering Unit (LEOCMLU) and to the coordination and administration role of the Pacific Anti-Money Laundering Programme (PALP), which GPML assumed in October 2008 and for which the USA pledged an additional US\$ 2,4 million over a two-year period.

The non-substantive project revisions have been predominately administrative in nature with the purpose of transferring GPML mentors (P-4 temporary posts) from UNOPS segment to UNODC Headquarters segment. The approved project budget remained the same for these project revision purposes.²⁹

1.3 UNODC Strategy Context

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

The project contributes to:

²⁹ Please refer to the Project Revision documents included as part of the desk review material.

Result area 1.2 - International cooperation in criminal justice matters

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

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

In the following way:

1. By placing anti-money laundering issues in the context of combating serious crime, including drug trafficking, terrorism and corruption. This is accomplished by contributing to the strengthening of governance, financial integrity, capacity for financial intelligence gathering and enhancement of investigative and prosecutorial systems with regard to money-laundering, the proceeds of crime and the financing of terrorism in accordance with related United Nations instruments and other AML/CFT standards.
2. Building the capacity of legislative bodies, criminal justice officials, supervisory and regulatory authorities and the private sector to draft, adopt and implement laws and regulations to combat money-laundering and the financing of terrorism.

1.4 Project Objective, Outcomes and Indicators

The detailed logical framework, which also includes Output Indicators, Means of Verification and Important Assumptions, is provided in the GLOU40 Project Document (2008).

1.4.1 Project Objective:

Assist States in building effective legal, regulatory and law enforcement capacity in compliance with the provisions of UN instruments and other anti-money laundering/countering the financing of terrorism (AML/CFT) international standards.

1.4.2 Outcomes:

Outcome 1:

Legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector aware of the negative economic and social impact of money-laundering and the financing of terrorism.

Outcome Indicators:

1. AML/CFT legislation developed by trained legislators and legislative personnel;
2. AML/CFT strategies and policies developed by trained criminal justice officials and integrated into relevant strategies and policies;
3. AML/CFT regulatory and supervisory frameworks developed and implemented by financial and supervisory authorities and the private sector.

Outputs:

Output 1: Target groups participating in the projects activities have a higher level of awareness on related aspects of money-laundering and the financing of terrorism;

Output 2: Expert group meetings on specialised and complex aspects of AML/CFT issues conducted;

- Output 3: AML/CFT policies and institutional frameworks, and possible links with existing anti-corruption, good governance and anti-terrorism policies reviewed and developed;
- Output 4: Reporting to the competent United Nations bodies including the Commission on Narcotic Drugs (CND) on the progress made by Member States to comply with the requirements of the UN Plan of Action to counter money-laundering provided;
- Output 5: Basic information on money-laundering provided and the proceeds of crime through the dissemination of the Computer-Based Training (CBT) programme identified;
- Output 6: The online International Money-Laundering Information Network (IMoLIN) maintained and upgraded;
- Output 7: Studies on the vulnerability of informal economies to money-laundering and the financing of terrorism carried out.

Outcome 2:

Knowledge and expertise to combat money-laundering and the financing of terrorism effectively applied by legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel), officials of anti-corruption entities, supervisory and regulatory authorities and the private sector.

Outcome Indicators:

1. AML/CFT legislation compliant with international standards considered by legislative bodies;
2. FIU established, financial investigations conducted and AML/CFT cases prosecuted with international standards applied by criminal justice officials;
3. AML/CFT prudential measures applied by regulatory and supervisory authorities and the private sector.

Outputs:

- Output 1: Model legislation and training materials developed;
- Output 2: Legislative drafting and amendment, to facilitate comparative analysis of legislation assisted with;
- Output 3: Country specific technical assistance provided;
- Output 4: Content of specialized services and technical assistance programmes to ensure that they meet the specific needs of the recipient States reviewed on an ongoing basis;
- Output 5: Sustainable training programmes on detection, prevention and criminalization of money-laundering and the financing of terrorism developed;
- Output 6: Mentors/advisors posted in the field providing continuous policy advice, on-the-job training, and other technical support to target groups.
- Output 7: Advice and inputs to UNODC programmes and project development and delivery provided.

Outcome 3:

AML/CFT coordination and cooperation enhanced among Member States, International Organizations and AML/CFT regional bodies.

Outcome indicators:

1. AML/CFT regional and international cooperation among Member States enhanced;
2. Exchange of information and AML/CFT coordination among international organizations improved;
3. AML/CFT coordination through AML/CFT regional bodies strengthened.

Outputs:

- Output 1: UNODC tools and services on international cooperation, mutual legal assistance, law enforcement, anti-organized crime, good governance and counter-terrorism promoted and disseminated;
- Output 2: Inputs to the development of new mechanisms promoting international cooperation in AML/CFT provided;
- Output 3: Collaboration with the Financial Action Task Force (FATF) and other standard setters and technical assistance (TA) providers increased;
- Output 4: The FATF-Style Regional Bodies (FSRBs) as the platforms for technical assistance coordination utilized;
- Output 5: Substantive inputs to the work and reporting requirements of the working group on “Tackling the Financing of Terrorism” provided.

II. PURPOSE OF THE EVALUATION

As foreseen in the project document (GLOU40) as well as per the rules of the UNODC Independent Evaluation Unit (IEU), an independent evaluation of the Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) needs to be conducted in order to (1) provide information on the impact of UNODC activities for better decision-making by UNODC management (best practices and lessons learned), (2) assess the results of the project and demonstrate to what extent it has achieved its objectives and has been relevant, efficient, cost effective and sustainable, (3) serve as a means to empower project stakeholders, target groups, and other beneficiaries but also to offer, if necessary a strategic repositioning of the Programme.

The purpose of the independent evaluation is to derive recommendations and lessons learned from measuring the achievements, outcomes and impact produced by the project. The recommendations of the evaluation will aim at enabling GPML to improve its core initiatives and governance structure.

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

The GPML project manager, in consultation with IEU, proposes a **Core Learning Partnership (CLP)** to ensure a participatory evaluation process during key stages of the evaluation. Members of the CLP shall be selected from key stakeholder groups (Section IX), including UNODC management, partner organizations, Member States, beneficiaries and Programme’s mentors. The CLP will be asked to comment on key steps of the evaluation.

GPML holds an annual donor briefing at the time of its annual mentors’ meeting to give an opportunity to its mentors to present specific activities carried out in their respective regions. It is

envisioned that the findings of the evaluation will be presented at this meeting, with other interested stakeholders present.

III. SCOPE OF THE EVALUATION

General

The time period to be covered by the evaluation will be from June 2004 (given that the most recent evaluation of GPML occurred in May 2004) until June 2010. The evaluation will consider in particular (1) how GPML contributes to fostering awareness, global commitment and action to combat money-laundering and the financing of terrorism in coordination with different stakeholders including governments, the international community, the international financial institutions (International Monetary Fund and World Bank), the Financial Action Task Force (FATF) and FATF-Style Regional Bodies (FSRBs); (2) how effectively GPML supports structures for AML/CFT policies and institutional frameworks; (3) how efficiently GPML promotes enhanced AML/CFT coordination and cooperation among Member States, international organizations and AML/CFT regional bodies and it will seek to (4) determine the significance of the anti-money laundering/countering the financing of terrorism in the UN agenda and how GPML fulfills this mandate.

As a global project, project outputs and activities are being led by UNODC Headquarters in cooperation with other stakeholders. Under UNODC Headquarter coordination, GPML also coordinates the activities of seven mentors (plus two intermittent mentors) and three consultants deployed in field offices.³⁰ Joint programme development with GPML's global field mentors provides "hands-on" assistance for capacity building which aims at ensuring sustainable technical assistance efforts in the following regions: (1) Central Asia (in a joint partnership with the World Bank); (2) Latin America and the Caribbean (in a joint partnership with UNDOC Legal Advisory Programme for Latin America and the Caribbean); (3) the Pacific; (4) Mekong Region (in a joint partnership with the World Bank); (5) Southern Africa; (6) West Africa and (7) Eastern Africa (until May 2010).³¹

³⁰ Please also refer to the desk review material for additional information on the GPML Mentor List and the GPML Mentor Field Presence Map.

³¹ The following supplementary chronological narrative provides a brief overview of the scope and breadth of GPML's regional global technical assistance efforts: Four mentors were placed in the **Caribbean** between 2000 and 2003 (assisting Barbados, Jamaica, Antigua & Barbuda, Dominica, Grenada, Saint Kitts Nevis, Saint Vincent and the Grenadines). GPML fielded two advisers in the **Pacific Region**, assisting for four years (2002-2006) the Republic of the Marshall Islands (RMI), Fiji, Samoa, the Cook Islands, Vanuatu and Nauru. In **Africa**, a mentor was assigned for five years (2002-2007) to the Secretariat of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), and provided assistance to the fourteen Members of the FATF-Style Regional Bodies (FSRBs). Another adviser based in the UNODC Senegal Field Office worked in the West and Central Africa region for two years (twenty-two target countries). GPML also fielded a law enforcement adviser in **Eastern Africa** for a year (2006), assisting Eritrea, Ethiopia, Kenya, Tanzania and Uganda and has since contracted an asset forfeiture adviser for Southern Africa (providing advice to Botswana, Namibia, Zambia and Zimbabwe). A joint legal/regulatory UNODC-World Bank Mentor has been in place in **Central Asia** for more than three years, providing AML/CFT advisory services and technical assistance to Kazakhstan, Kyrgyzstan, Uzbekistan, Turkmenistan and Tajikistan. Two experts have served as mentors in **South East Asia**, one for the FIU of the Philippines for one year (2006), and one FIU/Law Enforcement mentor (joint UNODC/World Bank Mentor) based in the UNODC Field Office in Vietnam, still assisting Viet Nam, Lao PDR and Cambodia. One mentor worked in the UNODC Field Office in Cairo for one year and a half to deliver law enforcement technical assistance to the Middle East and North Africa countries. From 2005 onwards, GPML and the Legal Advisory Programme for Latin America and the Caribbean (LAP) have been co-financing a Mock Trial Coordinator for **Latin America**. GPML also employed highly specialised experts on an *ad hoc* basis, who, in the framework of specific requests, over the past five years delivered specialized expertise in Armenia, Central Asia, Caucasus, Romania, Latin America, South Africa and Senegal. In August 2003, GPML provided law enforcement advice and assistance to Guatemala on a major breaking case involving laundering of the proceeds of a public pension fund fraud.

In view of the above, the evaluators will carry out the following missions: (1) participate in regional events where GPML intervenes; and (2) conduct interviews with the FATF Secretariat, FATF-Style Regional Bodies (FSRB) Secretariats and other partner organizations as well as representatives from beneficiary Member States. The details of the field missions and organizations to be interviewed are specified in **Annex III and IV** of the present Terms of Reference.

Institutional Learning and Strategic Repositioning

Institutional learning, accountability to Member States and strategic repositioning are at the core of the GPML evaluation. GPML's evaluation should trigger an ongoing learning process of reflective analyses highlighting what has or has not worked. Lessons learned from the reflective analyses should guide GPML's management in future decision making,

Based on the evaluation team's recommendations, GPML's management team and UNODC management should reflect on the information, deliberate and use the feedback loop to implement changes at various administrative, policy and operational levels. As information about the achievement of results is updated, GPML should strive to innovate existing "benchmarks" and "standards" in order to, where recommended, reposition itself strategically.

Key Evaluation Questions to be Answered by the Evaluation

The evaluation criteria for the project evaluation will include relevance, effectiveness, efficiency, sustainability and impact. In addition, attention will be paid to the lessons learned, best practices and partnerships. These will be connected to the project concept and design, the project implementation and deliverables and operational issues. Key evaluation questions will cover the following:

➤ **Relevance**

- (1) How relevant is the AML/CFT agenda for the UN and for the Member States?
- (2) To what extent is GPML aligned with the mandates, decisions and strategies of UNODC?
- (3) Are the objectives of GPML relevant in view of the current standards and international interest on AML/CFT related issues including on asset recovery?
- (4) How should the AML issue be further addressed in the context of the evaluation mechanism of UNCAC (United Nations Convention against Corruption) and the possible one on UNTOC (United Nations Convention against Transnational Organized Crime)?
To what extent should GPML be involved in this process?
- (5) Is GPML in line with the priority areas stipulated in various resolutions and declarations adopted in the framework for the UNGASS (United Nations General Assembly Special Session) and other relevant UN bodies for Mutual Legal Assistance (MLA) and Technical Legal Assistance (TLA) identified by Member States?
- (6) To what extent is GPML aligned with the mandates, strategies and programmes of partner organizations (including FSRBs), international financial institutions (World Bank / IMF) and key stakeholders? Are efforts between GPML and these partner organizations duplicated on any level?
- (7) To what extent should UNODC have a central AML programme with a strong field presence and not be fully relocated to the field?
- (8) To what extent does the current organizational structure of UNODC support GPML's mandate?

- (9) Considering the various players involved in technical assistance delivery, are the priority areas and objectives of GPML relevant to responding to international needs?
- (10) Does GPML provide an appropriate solution to the AML/CFT problems it seeks to address? Are the originally proposed project outcomes / outputs relevant to the overall and immediate objectives of GPML?

➤ **Effectiveness**

- (1) Has GPML achieved its objectives and results, as per the project document? If not, has some progress been made towards the achievement or results or have other results, which are not explicit in the project document, been achieved?
- (2) Is the mentor initiative an effective mechanism of delivering assistance through the transfer of skills, sharing of information and providing technical support to Member States?
- (3) How effective has GPML been in assisting Member States in the establishment of Financial Intelligence Units (FIUs), the capacity building of law enforcement officials and prosecutors and other anti-money laundering institutions?
- (4) How effective is GPML in disseminating anti-money laundering information through its various technical initiatives? How effective is GPML's online presence (IMoLIN and other relevant databases) available at www.imolin.org in providing anti-money laundering information to Member States and other interested parties? How could it be improved?
- (5) Has a project Steering Committee been set up to make possible proper monitoring throughout the project? If not, should such a system be recommended to enhance the effectiveness of GPML?
- (6) To what extent is the progress made so far the result of GPML's activities rather than of external factors? How did external factors impact on the effectiveness of GPML's activities?
- (7) Were recommendations, lessons learned and best practices from evaluations of similar projects and previous phases considered when planning the project?³² If these recommendations were not fully met, what could have been the reasons?
- (8) In general, what can be done to make GPML more effective?

➤ **Efficiency**

- (1) Has GPML's budget been allocated and spent as planned?
- (2) How does GPML optimize irregular flows of resources to ensure adequate strategic planning?
- (3) Can GPML activities be more streamlined in order to reduce costs while meeting the overall delivery objectives? And if so, how?
- (4) How could UNODC management better assist in raising resources for long-term planning?
- (5) Could GPML have achieved more results with the same input?

³² Reference here is made to the May 2004 Evaluation of GPML available as part of the desk review material. Please refer to the summary table of findings, supporting evidence and recommendations on pages *iii* and *iv* for a brief overview of evaluator findings, supporting evidence and recommendations. Please note that this table merely serves as a snapshot in time for the 1997-2004 period and is not a reflection of GPML's post May 2004 ongoing activities.

- (6) What measures have been taken during planning and implementation to ensure accountability on the use of resources?

➤ **Impact**

- (1) What has been the impact of GPML in the recovery of proceeds of crime?
- (2) What difference has GPML made to Member States, key stakeholders, and beneficiaries at the local level such as “end users” of anti-money laundering efforts?
- (3) What are the micro- or macro- long-term effects of GPML’s initiatives on ongoing target groups and intended beneficiaries in specific countries and regions with a GPML presence? Specifically, what are the long-term effects of GPML’s Technical Legal Assistance (TLA) and other local capacity building initiatives in these countries and regions?
- (4) What impact has the mentor initiative had on the development of national and institutional frameworks such as (for example, the establishment of FIUs) and the development of anti-money laundering legislation?
- (5) What are long-term effects of GPML on the inter-institutional cooperation and coordination with partner organizations (including the eight FSRBs)?
- (6) What has been GPML’s impact in the conduct of investigations / successful prosecution / confiscation of assets and proceeds of crime?
- (7) Should GPML be involved in pursuing impact in other substantive areas? Could GPML be more innovative in terms of products and tools development? If yes, in which field?

➤ **Sustainability**

- (1) Are GPML’s mentor initiatives enabling Member States to be self-sufficient with sustainable anti-money laundering programmes?
- (2) Can sustainability be strengthened by expanding the mentor initiative or adding regional expert mentors?
- (3) Are there GPML initiatives, which assist Member States to be self-sufficient with sustainable AML/CFT programmes?
- (4) Have GPML’s stakeholders and beneficiaries taken ownership of the objectives to be achieved by the project?
- (5) Can GPML become self-sustaining financially? If so, how? What would be the possible funding options to ensure long-term planning and meeting its core functions?
- (6) Does GPML receive sufficient financial and human resources to adequately meet its objectives and mid and long-term objectives and priorities?
- (7) How can GPML implement policy activities and sustain its core Headquarters staff when most of its funding is earmarked?

➤ **Lessons Learned**

- (1) What lessons can be learned from GPML’s mentoring initiative and other implementation modalities in order to improve performance, results and effectiveness in the future?
- (2) What best practices emerged from GPML’s implementation at various levels: in the field via mentor partnership and collaboration with partner organizations, FSRB’s and other key stakeholders?

- (3) What lessons can be drawn from GPML's governance arrangements?
- (4) What recommendations can be made to improve GPML's governance initiatives in order to increase ownership, relevance, effectiveness, efficiency, impact and sustainability?

➤ **Partnerships**

- (1) Has GPML effectively leveraged joint initiative opportunities with other United Nations entities (including UNODC Field Offices) and other anti-money laundering bodies throughout the world?
- (2) Does GPML's collaboration with partner organizations create a value-added synergy which avoids duplication of efforts?
- (3) What lessons can be drawn from GPML joint programmes?
- (4) What lessons can be drawn from GPML's engagement with target beneficiaries such as legislators, prosecutors, FIU analysts and law enforcement officials during the local capacity building joint collaborations.
- (5) What Steering Committee modalities, if any, would be called for?

IV. EVALUATION METHODS

The evaluation team will perform a desk review of existing documentation (Preliminary List of Documents to be Consulted in Annex II); information stemming from secondary sources will be cross-checked and triangulated through data retrieved from primary research methods.

Primary sources of data include, among others:

- ✓ Qualitative methods: Structured and semi-structured interviews with key stakeholders³³, key informants or representatives of different interested entities (face-to-face, by telephone or by webcam)
- ✓ Quantitative methods: The use of survey questionnaires

Secondary sources for the desk review will include, among others:

- ✓ The project documents and revisions (GLOB79 and GLOU40)
- ✓ The May 2004 Evaluation of GPML
- ✓ Monitoring data
- ✓ Baselines
- ✓ GPML annual and activity reports
- ✓ Brochures and other supplementary documents

The credibility of data and the analysis of data is key to the evaluation. Rival theories and competing explanations must be tested once plausible patterns emerge from triangulating data stemming from primary and secondary research. In order to assess the impact of the programme, "before and after data" should be used – as much as feasible - , addressing methodologically the questions listed under "impact". When feasible, treatment and control groups should be established, along with establishing a representative sample and credible sampling technique.

The Lead Evaluator will present a summarized methodology (evaluation matrix) in an inception report which will specify the evaluation criteria, indicators, sources of information and methods

³³ Stakeholders here refers to recipient target countries, partners, other beneficiaries, and UNODC management and mentors.

of data collection. The evaluation methodology must conform to the United Nations Evaluation Group (UNEG) Norms and Standards.

V. EVALUATION TEAM - SPECIFICATIONS AND REQUIREMENTS

The evaluation team will be comprised of a Lead Evaluator working in tandem with three evaluators, at least one of which will be a specialist in AML/CFT related matters. The Independent Evaluation Unit will provide for one of the evaluation consultants and secure quality assurance in accordance with UNODC's evaluation guidelines throughout the evaluation process..

The Lead Evaluator must meet the following technical qualifications:

- ✓ Master's degree in international development, public administration, social sciences, or related fields
- ✓ A minimum of 15 years of professional experience specifically in the field of evaluation of international programmes
- ✓ A track record of conducting various types of evaluation, including process, outcome and impact evaluations preferably with experience in conducting evaluations for the United Nations
- ✓ Knowledge and experience of the UN System
- ✓ Understanding of the anti-money laundering / countering the financing of terrorism (AML/CFT) framework would be an advantage
- ✓ Experience as a team leader
- ✓ Excellent report writing skills

The specifications and requirements for the other three evaluation consultants will be detailed in their respective terms of references. The indicative timeframe table in Section VI is subject to further refinement.

VI. PLANNING AND IMPLEMENTATION ARRANGEMENTS

Management Arrangements

The independent evaluation will be carried out following UNODC's evaluation policy and UNEG Norms and Standards. The evaluation team will work closely with UNODC's Independent Evaluation Unit.

The Independent Evaluation Unit

The Independent Evaluation Unit (IEU) guides the process of this evaluation; endorses the TOR, approves the selection of the proposed Evaluation Team and liaises closely with evaluators throughout the entire evaluation process. IEU comments on and approves the selection of evaluation consultants and the evaluation methodology and provides methodological support throughout the evaluation; IEU guides specific components in the field as per the indicative timetable in Section VI. IEU will comment on the draft report, endorse the quality of the final report, supports the process of issuing a management response, if needed, and participates in disseminating the final report to stakeholders within and outside of UNODC. IEU ensures a participatory evaluation process by involving Core Learning Partners during key stages of the evaluation.

Project Manager

GPML Management is responsible for the provision of desk review materials to the evaluation team, commenting on the evaluation methodology, liaising with the core learning partners, as well as commenting on the draft report and developing an implementation plan for the evaluation recommendations.

GPML Management will be in charge of providing logistical support to the evaluation team including arranging the field missions of the evaluation team. For the field missions, the evaluation team will liaise with the UNODC Regional/Field Offices and mentors as appropriate.

Core Learning Partners

Members of the Core Learning Partnership (CLP) will be selected by the project managers in consultation with IEU. Members of the CLP will be selected from the key stakeholder groups (Section IX), including UNODC management, mentors, beneficiaries, partner organizations and donor Member States. The CLP will be asked to comment on key steps of the evaluation and act as facilitators with respect to the dissemination and application of the results and other follow-up action.

Evaluation Team

Roles and Responsibilities of the Lead Evaluator

- ✓ carry out the desk review;
- ✓ develop the evaluation methodology, including sample size and sampling technique;
- ✓ draft the inception report and finalize evaluation methodology incorporating relevant comments;
- ✓ lead and coordinate the evaluation process and oversee the tasks of the evaluators;
- ✓ implement quantitative tools and analyse data
- ✓ Triangulate data and test rival explanations
- ✓ ensure that all aspects of the terms of reference are fulfilled;
- ✓ draft an evaluation report in line with UNODC evaluation policy;
- ✓ finalize the evaluation report on the basis of comments received;
- ✓ Include a management response in the final report
- ✓ present the findings and recommendations of the evaluation at the donor briefing at the time of its annual mentors' meeting

Roles and Responsibilities of the Evaluator

- ✓ assist the Lead Evaluator in all stages of the evaluation process, as per the respective TOR.
- ✓ participate in selected missions

Roles and Responsibilities of the Evaluator/ AML Specialist

- ✓ provide substantive assistance on AML/CFT related matters throughout the whole evaluation
- ✓ assist the Lead Evaluator in all stages of the evaluation process
- ✓ participate in selected missions

Roles and Responsibilities of the Evaluation Consultant from IEU

- ✓ in coordination with the IEU team, provide methodological evaluation quality assurance throughout the evaluation process
- ✓ comment on all deliverables of the evaluation team
- ✓ assist the Lead Evaluator in all stages of the evaluation process
- ✓ join some of the planned missions and apply methodological tools

More details will be provided in the respective TORs..

Expected Deliverables

The Lead Evaluator will have the overall responsibility for the quality and timely submission of all deliverables, as specified below:

- **Inception Report**, containing a refined work plan, methodology and evaluation tools.
- **Draft Evaluation Report** in line with UNODC evaluation policy and guidelines.
- **Final Evaluation Report**, including annex with management response
- **Presentation** of evaluation findings and recommendations to CLP and other key stakeholders

TABLE: Indicative Timeframe for the Evaluation Process

	Main duties	Consultant (Lead)	Evaluation Consultant	Evaluation Consultant	Evaluation Consultant	Location	Deliverables	
Preparatory Stage	Desk Review	17	18	8	32	home based	Inception report, containing refined work plan, methodology and evaluation tools	
	Development of evaluation methodology and tools							
	Briefing by UNODC programme team and IEU					Vienna, Austria		
	Interviews with UNODC Core Learning Partners and other key stakeholders							
	Preparation of the inception report					home based		
Implementation Stage	Piloting and adjustment of evaluation tools	30	45	18	40	field missions (details in Annex III) and home based	Draft evaluation report	
	Data collection: Application of quantitative and qualitative evaluation tools, including interviews with Core Learning Partners and other key stakeholders, survey etc.							
	Data analysis and triangulation					home based		
	Preparation of the draft evaluation report							

Finalization Stage	Consideration of comments provided by the programme team and IEU	8	8	3	8	home based	Final evaluation report, including management response; Presentation of evaluation findings
	Circulation of draft report to CLP for comments						
	Consideration of comments and preparation of the final evaluation report						
	Presentation of findings to CLP and other key stakeholders					Vienna, Austria	
Working Days Total		55	71	29	80		

Expected Total Duration

Based on above timeframe and estimated working days, as well as the plenary and field mission schedule in Annex III, the expected duration of the entire independent evaluation of GPML by the evaluation team will not exceed 6 months.

VII. PAYMENT

GPML will arrange for and bear the costs of the consultant's travel for the related field missions (see Annex III for details), issuing a travel authorization. 75 percent of the daily subsistence allowance and terminals will be paid in advance, before travelling. The balance will be paid after the travel has taken place, upon presentation of boarding passes and the completed travel claim forms.

The consultant will be paid in accordance with United Nations rules and procedures. Payment will correlate to deliverables – three instalments are foreseen (25%, 25% and 50% of total fees).

- The first payment (25 per cent of the consultancy fee) will be made upon receipt of the Inception Report by GPML;
- The second payment (25 per cent of the consultancy fee) will be made upon receipt of the Draft Evaluation Report by GPML;
- The third and final payment (50 percent of the consultancy fee, i.e. the remainder of the fee) will be made only after completion of the respective tasks and receipt of the final report and its clearance by UNODC.

VIII. CONFLICT OF INTEREST

The evaluator and evaluation team has the duty to disclose any reason that he/she or they would not be able to evaluate GPML in a fair and unbiased manner.

IX. CORE LEARNING PARTNERS

[details to be determined]

UNODC Managers	4 Representatives
Member States	4 Representatives
Partner Organizations	2 Representatives
Beneficiaries	2 Representatives
GPML Mentors	all GPML mentors

ANNEX I:

UN / UNODC acronyms:

CCS	Crime Conventions Section
CPS	Co-financing and Partnership Section
DO	Division for Operations
DTA	Division for Treaty Affairs
ExCom	UNODC's Executive Committee
FRMS	Financial Resources Management Service
GHSRLS	Governance, Human Security and Rule of Law Section
GPML	Global Programme against Money Laundering
HRMS	Human Resources Management Service
IEU	Independent Evaluation Unit
ITS	Information Technology Section
LAP	Legal Advisory Programme
LAS	Legal Advisory Section
LEOCAMLU	Law Enforcement, Organized Crime and Anti-Money Laundering Unit
PDB	Partnership in Development Branch
PPC	Programme and Project Committee
SPU	Strategic Planning Unit
TPB	Terrorism Prevention Branch
UNOV	HR United Nations Office at Vienna / Human Resources
COCOL	UNODC Colombia Country Office
COLAO	UNODC Lao PDR Country Office
COVIE	UNODC Vietnam Country Office
FO	Field Office
POCAM	UNODC Cambodia Project Office
ROCA	UNODC Central Asia Regional Office
ROEA	UNODC Regional Office for Eastern Africa
ROSAF	UNODC Regional Office for Southern Africa
ROSEN	UNODC Regional Office in West and Central Africa
CND	Commission on Narcotic Drugs
UNDCP	United Nations Drug Control Programme
UNDP	United Nations Development Programme
UNGASS	United Nations General Assembly Special Session
UNOPS	United Nations Office for Project Services
UNOV	United Nations Office at Vienna

AMLID	Anti-Money-Laundering International Database
CBT	Computer-Based Training
goAML	Software developed by UNODC to combat money-laundering and terrorist financing
goCASE	Software developed by UNODC / integrated investigative case management and analysis tool for government law enforcement, investigative and prosecution agencies
IMoLIN	International Money-Laundering Information Network (www.imolin.org)

ANNEX II**Desk Review: Preliminary List of Documents to be Consulted**

Document Description
Project Document/ Description GLOB79 (2003)
Project Revision GLOB79 (2007)
Project Document GLOU40 (2008)
Non-Substantive Project Revisions GLOU40 (2009-2010)
Substantive Project Revision GLOU40 (2009)
GPML Brochure
Money Laundering Overview (UN Conventions and International Standards)
Model Provisions on Money Laundering / Terrorist Financing (Common Law)
Model Legislation on Money Laundering and Financing of Terrorism (Civil Law)
GPML Evaluation (Independent Evaluation Unit) 2004
GPML Mentors Programme
GPML Mentors List
GPML Mentors Map – Field Presence
GPML Steering Committee
Counter-Terrorism and Capacity Building Program (CTCBP) funded by the Government of Canada / FIU Analyst Regional Training Funding Proposal
Semi-annual 2009 Project Progress Report (GLOU40)
2008 GPML Activity Report
2007 GPML Activity Report
2006 GPML Activity Report
Politically Exposed Persons (PEP) Report
Counter-Terrorism Implementation Task Force (CTITF) Report
Computer Based Training (CBT) Demos
Financial Intelligence and Analyst Training Courses (Guide and Agenda)
Pacific Anti-Money Laundering Programme (PALP) Quarterly Reports
UN Resolutions (Security Council / General Assembly / CND)
UN General Assembly Special Session (UNGASS) Reports
PPT for Donor Briefing 2009

ANNEX III**Details of Plenary and Field Missions**

Plenary Meeting	Location	Dates
Financial Action Task Force (FATF)	Paris, France	October 25-29
Asia Pacific Group on Money Laundering (APG)	Singapore	July 12-16
Asset Recovery Inter-Agency Network for Southern Africa (ARINSA)	Pretoria, South Africa	July 26-27

Field Missions	Dates
Hanoi, Vietnam	July 19-20
Windhoek, Namibia	July 28-30
Buenos Aires, Argentina (GAFISUD)	September (2 days)
Washington D.C., USA (WB, IMF, other partners)	September (2 days)
Astana, Kazakhstan	October 21-22

Briefing	Location	Dates
Preparatory Stage Briefing: Independent Evaluation Unit (IEU), UNODC/DO/DTA Senior Management, Organized Crime Branch (OCB)/Implementation Support Section (ISS), Co-financing Section (CPS), Terrorism Prevention Branch (TPB), Economic Crime and Corruption Branch (ECB), Integrated Programme, Oversight Branch (IPB), Information Technology Service (ITS) and Member States' representatives.	Vienna, Austria	19-23 July
Finalization Stage Briefing: Presentation of evaluation findings and recommendations to CLP and other key stakeholders; during GPML Mentors' meeting and annual donor briefing.	Vienna, Austria	2-3 December

ANNEX IV**Preliminary List of Interviewees**

Partner Organizations
The World Bank (WB)
International Monetary Fund (IMF)
Financial Action Task Force (FATF)
Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)
Counter-Terrorism Committee Executive Directorate (CTED)
Egmont Group of Financial Intelligence Units
Asia Pacific Group on Money Laundering (APG)
EurAsian Group on Money Laundering
Financial Action Task Force on Money Laundering in South America (GAFISUD)
Intergovernmental Action Group Against Money Laundering in West Africa (GIABA)
EUROPOL
INTERPOL
Organization for Security and Cooperation in Europe (OSCE)
Organization of American States (OAS)
World Customs Organization (W.C.O.)
US Treasury Office on Technical Assistance (OTA)
Governmental Counterparts and Beneficiaries
[details to be determined]
UNODC Headquarter Key Informants
[details to be determined]

D. 2004 evaluation of GPML - Recommendations and issues for the future

Recommendations (summary)

GPML must develop a strategic plan that provides guidance to the Global Programme against Money-Laundering, address the long-term global priorities, secure longer term funding as well as reduce frequency of ad hoc decisions.

UNODC should increase the GPML core funding to allow for more stable funding and longer term planning. An increase in core funding would create more security for staff, enable the GPML to plan and commit to a truly global programme.

The structure and configuration of GPML and AMLU should be enhanced by providing core funding and hence allowing for 5 staff to be located in field offices, 10 mentors to be strategically deployed in the regions and a core staff of 5 to be located at headquarters to support regional coordinators and plan global activities.

GPML should expand the mentor initiative and link this initiative to country and regional activities by developing a strategic plan and comprehensive global programmes that enable the donors to fund the whole package (mentors and activities).

The current GPML activities need to be continued and consolidated by developing a strategic Global Programme against Money-Laundering. The GPML provides support to countries through its activities.

GPML must reach out and develop or enhance joint initiatives and partnerships as well as coordinate with other United Nations entities and other international institutions involved in anti-money-laundering activities. Synergies must be built between the various United Nations entities, other international institutions and GPML in order to create greater impact.

UNODC should evaluate the quality and cost of services being provided by UNOPS. Further, there should be an evaluation of personnel practices, timely responsiveness and quality of support of the United Nations Office at Vienna personnel function to determine why managers choose UNOPS given some of the problems experienced.

Locate GPML staff in regional/field offices to ensure joint and full participation in AML activities by field offices and AMLU. Locations of GPML staff in field offices will improve communication and help with a better flow of information.

Issues for the future

The following are identified additional actions and decisions to be taken:

- (a) Existing cooperation between the Global Programme and the Egmont Group of Financial Intelligence Units should be enhanced, in particular in the context of the training working group, to support the sustainability of country FIUs;
- (b) Global accomplishments under the Programme need to be better publicized;
- (c) The Global Programme needs to be more multidisciplinary, balancing inputs from the financial sector, FIUs, law enforcement, prosecutors and the judiciary;
- (d) The Global Programme should cooperate with evaluation teams for other organizations working to counter money-laundering, such as the Financial Action Task Force against Money Laundering (FATF) and the World Bank.

E. International standards related to AML, CFT and crime proceeds

Council of Europe

- Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (CETS No.: 141) – 1990
- Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism and its explanatory report – 2005

European Union

- Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing (available in other EU official languages)
- Regulation (EC) no. 1781/2006 on information on the payer accompanying transfer of funds
- Regulation (EC) no. 1889/2005 on controls of cash entering or leaving the Community
- Directive 2007/64/EC of the European Parliament and the Council on payment services in the internal market

Financial Action Task Force

- The Forty Recommendations (2003)
- The Forty Recommendations in other languages (Polish, Russian etc.)
- The Special Recommendations on Terrorist Financing (also available in other languages) and interpretative notes
- The FATF Methodology for Assessing Compliance with the FATF 40 Recommendations and the FATF 9 Special Recommendations (updated 2009) ³⁴
- The FATF/World Bank/IMF Methodology for Assessing Compliance with the FATF 40 Recommendations and the FATF 9 Special Recommendations (2007)

United Nations

- International Convention for the Suppression of the Financing of Terrorism (1999) (Terrorism Financing Convention)
- United Nations Convention Against Transnational Organized Crime (2000, ‘Palermo Convention’)
- United Nations Convention against Corruption (2003)
- United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988, Vienna Convention)

³⁴ <http://www.fatf-gafi.org/dataoecd/16/54/40339628.pdf>

F. 2008 goAML evaluation report's executive summary

"The United Nations Office on Drugs and Crime's goAML system is a comprehensive integrated solution to specifically address the requirements of Financial Intelligence Units (FIUs). The goAML client provides a user-friendly, feature-rich environment for users who are familiar with Microsoft Windows™ applications. The base functionality of the client is considerable and impressive, enabling the users to ask almost any question of the underlying data. Although not all features of the system were ready to be evaluated by AUSTRAC and FINTRAC, the core features of the product appear to fulfil many of the requirements of an FIU.

The question to be answered by this evaluation was: is goAML a suitable solution for Financial Intelligence Units? The answer to this question is a conditional yes; FIUs considering goAML should take note of the various issues raised in this report and carefully consider requirements specific to their jurisdiction.

The benefits of goAML are apparent from a number of perspectives. As an integrated solution, users can focus on performing their core tasks, rather than spending time manipulating and exporting data to be used in third-party tools such as report writers, charting and graphing tools and document management systems. IT Operations have less procurement, licensing and support issues since they are dealing with a single product.

The goAML system would currently be best suited to FIUs:

which expect small-to-medium reporting volumes (AUSTRAC/FINTRAC estimate up to 10,000 reports per day given a single-server configuration¹) of cash transaction, domestic wire transfer and suspicious transaction reports

which primarily accept electronic submission of reports, although there are both web-and client-based manual data entry options

□ whose reporting institutions are mainly traditional financial institutions, i.e. banks, which have the IT capability to perform report/transaction extraction to conform with goAML's reporting requirements (XML schema) FIUs with existing data collections will need to devote significant resources to a data migration project and the time and cost for the data migration phase should not be underestimated.²

FIUs wishing to provide access to goAML to partner agencies need to consider the issues raised in the relevant section of this report.

There remain a number of challenges with respect to goAML:

- 1. The ability to support the wide variety of data collection requirements and report types for different jurisdictions*
- 2. Where a customer FIU or jurisdiction has limited or no IT capability, the support model will require access to the recipient FIU's system. The political and security issues surrounding this arrangement will require careful consideration.*
- 3. Development of functionality to deal with situations where data quality is poor or not up to the standard preferred by goAML*
- 4. Performance issues which may affect the ability to process a high daily volume of reports, which will in turn affect the timeliness and effectiveness of intelligence*

Despite this and given the UNODC's track record with the National Drug Control System (NDS) it is in the strong position of being able to provide a tailored and integrated solution to, as well as global support for, FIUs worldwide.

The further development of goAML could be enhanced by the cooperation of FIUs at the international level by contributing to the identification of requirements and development of enhancements. The challenge for the UNODC will be managing the different jurisdictional requirements and versions that will result versus maintaining a reliable and stable platform for all stakeholders.

goAML can be considered a valuable contribution to the FIU software and systems solution space. As with any significant software acquisition, an FIU will need to conduct a detailed evaluation to ascertain whether goAML meets the FIU's requirements in terms of its:

- data model*
- data collection standards*
- infrastructure model*
- technology stacks*
- support model”*

G. Evaluation tools – interview and survey questionnaires

PROTOCOLS FOR SEMI-STRUCTURED INTERVIEWS with

- COUNTRY COUNTERPARTS AND BENEFICIARIES
- REPRESENTATIVES OF PARTNER ORGANIZATIONS
- GPML MENTORS AND ADVISORS
- GPML PROGRAMME TEAM AND MANAGEMENT
- OTHER SECTIONS OF UNODC AND FIELD STAFF

Introduction: input will be used confidentially, on an aggregate level only, NO attributable quotes; name listed in Annex as interviewee

Questions for country counterparts and beneficiaries

1. Which services or products that GPML provides are you aware of?
2. What type of assistance has GPML provided to your country?
 - 2.1 Has your legislature adopted AML/CFT legislation since 2004?
 - 2.2 Was GPML's model legislation used?
 - 2.3 Has GPML's mentor assisted in the drafting? What was the value of it?
 - 2.4 Have officials in your country received any AML/ CFT related training since 2004?
 - 2.5 To what extent has GPML been involved?
 - 2.6 What was the value of GPML's training? / How have you used it?
 - 2.7 How have GPML mentors helped you in setting up AML/CFT policies and procedures?
 - 2.8 How has IMoLIN website, AMLID database or 'goAML' and 'goCASE' software been useful to you?
3. Overall, have you been satisfied with the assistance provided by GPML?
 - 3.1 Has the TA been provided according to your needs?
 - 3.2 Do you see any long-term effects of the assistance provided by GPML?
 - 3.3 In your opinion, has GPML effectively contributed to improved local AML/CFT capacity?
 - 3.4 Has GPML contributed to making your country's AML/CFT measures more effective? (If not, why?)
4. Which other factors have contributed to an improved AML/CFT regime in your country?
5. Do you know of other providers of the type of assistance GPML provides?
6. In your opinion, what makes GPML's assistance unique?/ What are GPML's strengths?/ What do you see as the main added value provided by GPML staff and mentors?
7. How could GPML improve its services and products?
8. Did you or your organization participate in the typologies related APG meetings (or FATF, ESAAMLG etc.) in the last five years?
9. Have you used GPML databases, training material or assistance in preparing APG (or FATF, ESAAMLG etc.) relevant papers, reports and studies? How?

10. Have GPML mentors assisted in the preparation for Mutual Evaluations? How?
11. Are GPML staff and mentors providing relevant input at the APG (or FATF, ESAAMLG etc.)meetings? How?
12. (To what extent have the results of the IIWG (SIP) Framework Pilot Workshop, Kuala Lumpur, 1- 4 April 2008 been used by countries? Was the role of GPML recognized?)
13. Has your country participated in regional or country specific SIP workshops? To what extent has GPML been involved? What was the value of that assistance? / How have you used it?

Questions for representatives of partner organizations

1. What type of cooperation and interaction have you experienced between your organization and GPML and UNODC since 2004?
2. Which lessons learned could be drawn from this experience?
3. Which services or products that GPML provides are you aware of?
4. Do you know of other providers of the type of assistance GPML provides?
5. In your opinion, what makes GPML's assistance unique?/ What are GPML's strengths?/ What do you see as the main added value provided by GPML staff and mentors?
6. In your view, how could GPML improve its products and services?
7. Is GPML contributing to improved harmonization among TA providers in the field of AML/CFT? How?
8. In your opinion, has GPML effectively contributed to improved local AML/CFT capacity?
9. Would you say that GPML has effectively contributed to improving the AML/ CFT regime in the countries of the region? How and to what extent?
10. Which other factors have contributed to an improved AML/CFT regime in the countries of the region?
11. Did you or your organization participate in the typologies related APG meetings (or FATF, ESAAMLG etc.) in the last five years?
12. Are you using GPML databases or documents for preparing APG (or FATF, ESAAMLG etc.) relevant papers, reports and studies? How?
13. Are GPML staff and mentors providing relevant input at the APG (or FATF, ESAAMLG etc.) meetings? How?
14. (To what extent have the results of the IIWG (SIP) Framework Pilot Workshop, Kuala Lumpur, 1- 4 April 2008 been used by countries? Was the role of GPML recognized?)

Questions for GPML mentors and advisors

1. How would you describe the setup of your cooperation with GMPL staff at headquarters, other UNODC staff at headquarters and UNODC field office staff?
2. To what extent do you consider the material and support provided by GPML staff at headquarters useful to your work? How could it be improved?
3. To what extent do you consider the support provided by other UNODC staff at headquarters useful to your work? How could it be improved?
4. To what extent do you consider the support provided by UNODC field offices useful to your work? How could it be improved?

5. Do the working arrangements (contract, remuneration etc.) provide a good basis for carrying out your assignment? What should be improved?
6. To what extent do you work with staff from other organizations of the UN system?
7. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
8. How would you characterize your cooperation with partner organizations and other providers of TA in the field of AML/CFT?
9. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
10. How would you characterize your cooperation with country counterparts?
11. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
12. What do you consider to be the main results you have helped make happen through your mentoring or as an advisor? (break it down by time and country)
13. How do you keep track of outcomes that your work made happen?
14. What do you consider the main obstacles to achieving results?
15. How could those obstacles be overcome?
16. Do you see any long-term impact of GPML? Please describe.
17. What are the strengths of GPML, compared to providers of TA in the same field?
18. What are the weaknesses of GPML, compared to providers of TA in the same field?
19. In your opinion, what should be improved?
20. If you worked for UNODC before 2004, what has changed since then?

Questions for GPML programme team and management

1. What is your role in implementing GPML?
2. What are your contributions or accomplishments?
3. What do you consider to be the main results you have helped make happen through GPML ?
4. How do you keep track of/ measure results that your work made happen?
5. What is the main long-term impact of GPML? Please describe.
6. What do you consider the main obstacles to achieving results?
7. How could those obstacles be overcome?
8. In your opinion, what should be improved?
9. Has GPML contributed to making the AML/CFT measures in the countries more effective/compliant with standards? (If not, why?)
10. Which other factors have contributed to an improved AML/CFT regime in the intended beneficiary countries?
11. Do you feel you get enough guidance and training?

12. How would you describe the setup of your cooperation with GMPL staff at headquarters, other UNODC staff at headquarters and UNODC field office staff?
13. What type of cooperation and interaction have you experienced between GPML and other UNODC staff?
14. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
15. To what extent do you work with staff from other organizations of the UN system?
16. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
17. Do you know of other providers of the type of assistance GPML provides?
18. What are the strengths of GPML, compared to providers of TA in the same field?/ In your opinion, what makes GPML's assistance unique?
19. How would you characterize your cooperation with partner organizations and other providers of TA in the field of AML/CFT?
20. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
21. To what extent do you work with country beneficiaries?
22. Which lessons learned could be drawn from this cooperation? (What, if any, are the main difficulties in working with them?)
23. If you worked for UNODC before 2004, what has changed since then?

Questions for other sections of UNODC and field staff

1. What is your role in connection with AML and CFT?
2. Do you see any interlinkages between GPML, the field and other sections of UNODC? (Which ones?)
3. How does GPML coordinate its work with the field and other sections of UNODC?
4. What type of cooperation and interaction did you have with GPML since 2004?
5. How would you characterize your cooperation with GPML?
6. Which lessons learned could be drawn from this experience?
7. What impact do you have on the level of intergovernmental bodies?
8. Do you see any impact of GPML on the level of intergovernmental bodies?
9. What do you consider to be the main results of GPML?
10. What are your contributions to these results?
11. How can these results be measured? (What is the evidence?)
12. What do you consider the main obstacles to achieving results in the field of AML/CFT?
13. How could those obstacles be overcome?
14. In your view, what are GPML's strengths and weaknesses?
15. What should be improved?

[Specific questions related to joint output etc.]

Survey questionnaire

- 1 In what activities undertaken under the UNODC Global Programme on Money-Laundering (GPML) did you participate? (Please check all that apply.) Note: Asia-Pacific participants may know it as the Pacific Anti-Money Laundering Project (PALP). OPTIONS: Training courses on legislation/Computer-based training on law enforcement/Financial investigation Course/FIU Analyst Training Course/Training courses for judiciary/ Mock trials/Work with mentors/Expert groups and consultations/Other-If other, please specify:
- 2 What were the main concepts and skills you learned at the training program? Please mention at least one.
- 3 What was the main use that you made of the training or advice provided? Please give at least one specific example.
- 4 What do you feel were the best aspects of this training program?
- 5 What about these training programs could be improved?
- 6 Which of the following products and services provided by the GPML/ UNODC are you familiar with? OPTIONS: Mentoring and advice/Mutual Legal Assistance (MLA) Tool/Model laws and provisions/IMOLIN/AMLID/Compter-based Training modules (CBT)/Country specific technical assistance/goAML/Face-to-face training/Publications; SCALE: Not Aware/ Aware but not used/ Used but not found helpful/Used and found helpful/ Used and found very helpful
- 6+ If you selected publications and others, please specify which ones:
- 7 What other providers of training in the field of AML/CFT are you aware of?
- 7+ If you are aware of other providers, in your opinion, is there anything unique about GPML?
- 8 What should the Global Programme on Money-laundering do differently to be more effective and useful to you?
- 9 In your opinion, what major changes are required to make the AML/ CFT laws, policies and measures of your country more effective? (Please note AML refers to the anti money-laundering and CFT to countering the financing of terrorism laws.)
- 10 Some say that the 40+9 recommendations made by the Financial Action Task Force (FATF) should be a basis for national legislation and law enforcement practices. Do you consider yourself familiar with the FATF Recommendations?
- 10+ If yes, should the FATF recommendations be such a basis?
- 11 Have you made use of the UNODC website?
- 11+ If yes, what information did you obtain? How did you use it?
- 12 What GPML activity/ workshop/ programme did you last attend? Venue/_ Year/_ My home country or region is_
- 13 What was the procedure used to select trainees for the above programme? Trainees were selected by_/The criteria for selection was_
- 13+ Do you recommend any changes to the procedure used? I would suggest the following changes_
- 14 I am male_ /female_ / My age (years) is_

H. List of persons interviewed

- Aeschlimann, Yves**, Senior Financial Markets Specialist, Pretoria, The World Bank
- Ahmine, Rashid**, Assistant Director of Public Prosecutions, Office of the Director of Public Prosecutions and Drugs Commissioner, Mauritius
- Ali, Timothy**, State Prosecutor, Office of the Public Prosecutor, Papua New Guinea
- Al-Qulish, Adel Hamad**, Executive Secretary, Middle East and North Africa Financial Action Task Force (MENAFATF)
- AML/CFT expert [anonym.]**, consultant for technical assistance providers
- Anderson, James**, Senior Governance Specialist, The World Bank
- Aquino, Vicente S.**, Executive Director, Anti-Money Laundering Council Secretariat, Republic of the Philippines
- Atkinson, Phyllis**, Head of Training, ICAR, Basel Institute on Governance
- Bampton, Willie**, Deputy Commissioner, Namibian Police
- Barrum, Bernard**, Detective Sergeant, Papua New Guinea Finance Intelligence Unit
- Batt, Chris**, GPML/ WB AML/CFT Technical Assistance South East Asia (Cambodia, Lao PDR and Viet Nam)
- Bekkoenova, Ainura**, Associate Expert, Eastern Africa Regional Office (ROEA) , UNODC
- Bennett, Patricia**, Senior Project Leader, Financial Crimes, International Financial Sector Division, Ministry of Finance, Canada
- Biseswar, Priya**, Asset Forfeiture Unit, Pretoria, South Africa
- Blackburn, Wayne**, Former AML long term Adviser East Africa (Tanzania, Kenya, Ethiopia, Uganda, Rwanda, Burundi), Eastern Africa Regional Office
- Bloomfield, Kulu 'Anisi**, Head of Secretariat, Oceania Customs Organization Secretariat
- Broms, Mika**, Specialized Officer Financial and High-Tech Crime Sub-directorate, INTERPOL
- Buckland, Andrew**, Senior State Prosecutor, Department of Justice and Attorney General (DJAG), Australia, Office of the Public Prosecutor, Papua New Guinea
- Buksh, Razim**, Director, Fiji Financial Intelligence Unit, Reserve Bank of Fiji
- Bumatay, Ruel M.**, Technical Service Staff, Anti-Money Laundering Council Secretariat, Republic of the Philippines
- Byrne, Matthew**, Senior Counsel, Legal Department, International Monetary Fund
- Carapinha, José Alberto**, Legal Counsel, Financial Intelligence Office, Macau, China
- Cedhagen, Anders**, Appeals Court Judge in Göttingen; former GPML staff member
- Chevis, John**, Mentor for Australian Police Partnership, Australian Federal Police
- Chien, Hoang Manh** (and colleagues), Deputy Director, Investigation, Police Department, Ministry of Public Security, Viet Nam
- Chirwa, Mary**, Assistant Commissioner, Drug Enforcement Commission of Zambia
- Chu Un I, Connie**, Senior Officer, Financial intelligence Analysis, Financial Intelligence Office, Macau, China
- Curia, Eugenio Maria**, Ambassador Extraordinary and Plenipotentiary, Argentina, former President of GAFISUD

D'Hoore, Ludovic, GPML AML/CFT Technical Assistance West Africa (Benin, Burkina Faso, Cape Verde, Côte d'Ivoire, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sierra-Leone & Togo), Senegal Regional Office

Dedeayne-Amann, Jo, Policy Coordination Officer, Terrorism Prevention Branch, UNODC

Dlamini, Mumcy, Director of Public Prosecutions, Ministry of Justice, The Royal Swaziland Police

Drayton, Fitz-Roy, former GPML Legal Mentor on AML/CFT for the Asia Pacific Region (Cook Islands, The Federated States of Micronesia, Fiji, Kiribati, Nauru, Niue, Papua New Guinea, The Republic of Marshall Islands, The Republic of Palau, Samoa, Solomon Islands, Tonga, Tuvalu and Vanuatu)

Dung, Nguyen Tuong (with Tran Van Thanh), National Project coordinator of S65 and National Technical Expert of GPML/ UNODC Viet Nam

Dunn, Leonie, Head of FIU, Windhoek, Namibia

El Kasm, Saeb, GPML Contractor

Falesiedi, Mauro, First Officer Criminal Department, Financial Crime Unit, Europol

Ford, Jennifer, Project Officer, Technical Assistance and Training, Asia/Pacific Group on Money Laundering (APG)

Fozzard, Adrian, Stolen Asset Recovery Initiative (StAR) Coordinator, The World Bank

Frane, Arnold G., Banc Officer, Anti-Money Laundering Council Secretariat, Republic of the Philippines

Fullin, Esteban, Deputy Executive Secretary, Financial Action Task Force of South America Against Money Laundering, GAFISUD

Gasimov, Adishirin, Director of Financial Monitoring Service, Central Bank of the Azerbaijan

Goddard, Simon, Former GPML Advisor for Central Asia

Gray, Larissa, Financial Market Integrity Specialist, Finance and Private Sector Development Vice Presidency (FPDFI), The Word Bank

Guetaz, Sylvain, First Secretary/ Premier Secrétaire Mission permanente auprès des Nations Unies, Vienne, France

Ha'apio, Michael O., Director, Solomon Islands Financial Intelligence Unit, Central Bank of Solomon Islands

Hammond, Mark, Senior Officer, Egmont Group

Hanke, Martina, Expert, Co-financing and Partnership Section, UNODC

Hartmann, Paul, Deputy Governor, Bank of Namibia

Higginbotham, Ian, Senior Project Manager / Agent principal de projects, Counter-Terrorism Capacity Building Program (CTCBP), Programme d'aide au renforcement des capacités anti-terroristes (PARCA), Canada

Hoelge, Kristian, GPML/LAPAC Regional Legal Advisor for Latin America and the Caribbean (Colombia, Costa Rica, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Nicaragua and Panama), Columbia Office (COCOL)

Hofmeyr, Willie, Head of Asset Forfeiture Unit, National Prosecuting, Authority of RSA, South Africa

Hook, Gordon, Executive Secretary Asia/Pacific Group on Money Laundering (APG)

Jerneloev, Muki, External Relations Officer, Co-financing and Partnership Section, UNODC

Jimenez Lopez, Mónica, GPML Financial Expert in Money Laundering, GPML advisor for Latin America and the Caribbean (Colombia, Costa Rica, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Nicaragua and Panama), Colombia Country Office (COCOL)

Joyce, Elizabeth, Senior Legal Officer, U.N. Counter-Terrorism Committee (CTED)

Kabiru, Muturi, Former AML/CFT project manager, Eastern Africa Regional Office (ROEA) , UNODC

Kefu, 'Aminiasi, Solicitor General, Crown Law Department, Government of the Kingdom of Tonga

Keltschewsky, Alexandre, Head of Centre, OSCE Office in Astana

Kennedy, Eliot, Deputy Secretary Asia/Pacific Group on Money Laundering (APG)

Khama, Dennis, Head of Compliance, FIC, Bank of Namibia

Kilepak, Molean, Director, Legal Policy and Governance Branch, Department of Justice and Attorney General, Papua New Guinea

Kisanga, Eliawony, Executive Secretary, Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)

Kruss, Phillip, Chief Information Technology Service, UNODC

Kuleshnyk, Irka, Senior Coordinator, Regional and National Terrorism Prevention Unit, UNODC

Kussainova, Salamat, Public Sector Reform Consultant, World Bank Office in Astana

Kusters, Hennie, Head of Dutch FIU, Zoetermeer, Holland

Kyriakos-Saad, Nadim, Policy and Research Coordinator, Financial Integrity Group, Legal Department, International Monetary Fund

Laborde, Jean-Paul, Special Advisor to the Under-Secretary-General, Department of Political Affairs, Counter Terrorism International Task Force (CTITF)

Lapaque, Pierre, Officer-in-Charge of Implementation Support Section of Organized Crime & Illicit Trafficking Branch, UNODC

Le Pichon, Thibault, Chief, Studies and Threat Analysis Section, UNODC

Lewis, Gary, Representative East Asia and the Pacific Regional Centre (RCEAP) , UNODC

Ligay, Zarina, Senior Programme Assistant, OSCE Office in Astana

Lilungwe, Mukubonda, Financial Crimes Investigator, Commercial Crime Unit, Namibian Police

Lucas, Jonathan, Secretary of the International Narcotics Control Board (INCB), Chief of INCB Secretariat Office of the Secretary, UNODC

Maertens, Francis, Deputy Executive Director of UNODC, Director of Division for Operations

Makofi, Goodwill, Directorate of Public Prosecutions, Botswana

Marian, Cecilia J., Adviser on Anti-Money Laundering for several GPML partner organizations

Maseko, Moses Velebantfu, Assistant Commissioner of Police, Director, Crime, The Royal Swaziland Police

Mathias, Emmanuel, Senior Financial Sector Expert, Financial Integrity Group, Legal Department, International Monetary Fund

Matshameko, Ngadzi Festus, Chief Investigator, Directorate on Corruption & Economic Crime, Botswana

McDonell, Rick, Executive Secretary, Financial Action Task Force (FATF)

Mchenga, Chalwe F. R., Director of Public Prosecutions, Ministry of Justice, Zambia

Me, Angela, Chief, Statistics and Surveys Section, UNODC

Meiramov, Yerzhan, Head of the Legal Department of the Ministry of Finance, Kazakhstan

Mera, Floyd Ray, Manager, Financial Analyst, Financial Intelligence Unit, Government of the Republic of Vanuatu

Mganga, Biswalo, Senior State Attorney, Directorate of Public Prosecutions, Tanzania

Miedico, Mauro, Coordinator, Specialized Terrorism Prevention Unit, UNODC

Miletic, Marijana, Budget Assistant, Project Financial Management Sub-Unit, UNODC

Moldabayev, Sarkitbek, Director of the Institute, General Public Prosecution Office, Kazakhstan

Montesdeoca, Alejandro, Executive Secretary, Financial Action Task Force of South America Against Money Laundering, GAFISUD

Mosoro, Nichodemus, Principal Legal Officer, Legal Policy and Governance Branch, Department of Justice and Attorney General, Papua New Guinea

Mudler, Mark, Criminal Intelligence Analyst, SCA/CAS Specialized Crime and Analysis Directorate, INTERPOL

Muhl, Burkhard, Serious Crime Department, Financial and Property Crime Unit, CARIN Secretariat Europol

Muller, Ann Marie, Banking Commissioner, Office of the Banking Commission, Head of the Financial Intelligence Unit, Marshall Islands

Munro, Ian Roger, Programme Officer, Implementation Support Section of Organized Crime & Illicit Trafficking Branch, UNODC

Myers, Joseph, Senior Counsel, Financial Integrity Group, Legal Department, International Monetary Fund

Nadeau, Josée, Senior Chief, Financial Crimes – International (Head of Delegation), Financial Sector Division, Financial Sector Policy Branch, Department of Finance Canada

Naukosho, Ismael, Deputy Director, Financial Investigations and Analysis, FIC, Bank of Namibia

Ndjavera, Zedekia, Chief Inspector of Commercial crimes and frauds syndicate, Namibian Police

Nebyvaev, Igor, Executive Secretary Eurasian Group (EAG)

Ng, Man Seong (Deborah), Director, Financial Intelligence Office, Macau, China

Noble, Ronald, Secretary General, INTERPOL

Nunkoo, Seegobin (Radhamohun), Drug Asset Forfeiture Office, Mauritius

Nyakulinga, Suleiman, Superintendent of Police, Tanzania Police

O'Sullivan, Patrick, Senior Law Enforcement Systems Advisor, External Systems Unit, UNODC

O'Sullivan, Rita, Principal Counsel, Office of the General Counsel, Asian Development Bank

Omar, Suhanna, Manager, Financial intelligence Unit, Bank Negara (Central Bank) Malaysia

Perret, Catherine, Chief, Budget Unit, UNODC

Pesme, Jean, Programme Manager Financial Sector Development, The World Bank

Petrova, Antoaneta, GPML Team Assistant

Phan, Ho, Secretary General, Cambodia Financial Intelligence Unit, National Bank of Cambodia

Pickering, Caroline, Senior FIU Officer, Fiji Financial Intelligence Unit, Reserve Bank of Fiji

Pilgrim, Julia, GPML Associate Expert (Liechtenstein)

Pinner, Graham, GPML Intermittent FIU Mentor for the Asia Pacific Region (Cook Islands, The Federated States of Micronesia, Fiji, Kiribati, Nauru, Niue, Papua New Guinea, The Republic of Marshall Islands, The Republic of Palau, Samoa, Solomon Islands, Tonga, Tuvalu and Vanuatu)

Power, Ric, GPML AML Adviser/ Law Enforcement

Ratanavong, Vongpaseuth, Deputy Director, Anti Money Laundering intelligence Unit (AMLIU), Bank and Financial Institutions Supervision Department, Bank of the Lao PDR

Rechova, Maria, GPML Associate Expert (France)

Richard, Marc, Policy Analyst, International Relationships, Financial Transactions and Reports Analysis and Centre of Canada (FINTRAC), Canada

Robben, Marloes, Head of Dutch FIU, Zoetermeer, Holland

Ruthstrom-Ruin, Cecilia, Chief of Terrorism Prevention Branch, UNODC

Samuel, Linda, Deputy Chief of Asset Forfeiture and Money Laundering Section, Bureau of International Narcotics and Law Enforcement Affairs (INL), Department of Justice, U.S. Department of State

Sanchez, Francis, Senior Financial Officer, Egmont Group

Sandage, John, Officer-in-Charge of Division for Treaty Affairs, Chief of Organized Crime & Illicit Trafficking Branch, UNODC

Schantz, Delphine, GPML Programme Manager, GPML AML Adviser

Scott, Clive, GPML Asset Forfeiture Adviser Southern Africa (Botswana, Namibia, Zambia, Zimbabwe)

Seaman, Richard N., Regional Economic Crimes Advisor for Europe and Asia, U.S. Department of the Treasury

Shams, Heba, Senior Financial Sector Specialist, Financial Market Integrity, The World Bank

Shannon, David, Principal Executive Officer, Asia/Pacific Group on Money Laundering (APG)

Shaw, Mark, Officer-in-Charge Integrated Programme and Oversight Branch, UNODC

Shehu, Abdellahi, Director General, Inter-Governmental Action Group against Money Laundering in West Africa (GIABA)

Sibeya, Orben, Deputy, Prosecutor General- ML, corruption, trafficking, Namibia

Silensky, Valerie M., Senior Advisor, Money Laundering / Threat Finance Unit U.S. Department of State, Bureau of International Narcotics and Law Enforcement Affairs, U.S.A

Small, Daniel, Deputy, Prosecutor General- Criminal Prosecution, Office of the Prosecutor-General, Namibia

Somerville, Bronwyn, Executive Secretary, Egmont Group

Stephenson, Kevin M., Senior Financial Market Specialist, Financial Market Integrity, The World Bank

Stroligo, Klaudijo, World Bank/GPML AML/CFT Mentor, Central Asia Region (Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan)

Sun, Dymo, Deputy Head of Division, Cambodia Financial Intelligence Unit, National Bank of Cambodia

Thibeli, Thabiso Jobo Silas, Directorate on Corruption and Economic Offences, Ministry of Justice, Lesotho

Thomas, Jill, Serious Crime Department, Financial and Property Crime Unit, CARIN Secretariat, Europol

Tinh, Dao Quoc (and colleagues), Director AMLD & DDG, Banking Supervisory Agency, Anti-Money Laundering Department, State Bank of Viet Nam

Todoroki, Emiko, Senior Financial Sector Specialist, Finance and Private Sector Development Vice Presidency (FPDFI), The Word Bank

Tsuses, Louretha, Inspector, AML/ Commercial Crime Unit, Namibian Police

Tuleussarinova, Saule, Programme Manager, US Embassy in Astana

US Technical Assistance Provider [anonym.], Representative, United States government

Utebaev, Mussiraly, Head of the Committee for Financial Monitoring, Kazakhstan

Van der Does de Willebois, Emile, Financial Market Integrity Specialist, Finance and Private Sector Development Vice Presidency (FPDFI), The Word Bank

Van der Merwe, Erna, Deputy Director, Anti Corruption Commission, Namibia

Van Dyk, Michiel, GPML AML Adviser/ Legal

Verhelst, Boudewijn, Deputy Director CTIF/CFI Belgium FIU, President Egmont Group

Vlassis, Dimitri, Chief of Corruption and Economic Crime Branch, Officer-in-Charge of Implementation Support Section, UNODC

Vongphranakhorn, Leuane, Deputy Director General, Anti Money Laundering intelligence Unit (AMLIU), Bank and Financial Institutions Supervision Department, Bank of the Lao PDR

Votava, Cari, Senior Financial Sector Specialist, Finance and Private Sector Development Vice Presidency (FPDFI), The Word Bank, former GPML mentor for Central Asia

Wanger, Domenik, First Secretary (Deputy Head of Mission), Permanent Mission of the Principality of Liechtenstein to the United Nations (Vienna)

Ward, Wendy, Senior Manager, International Technical Assistance and Training, Australian Transaction Reports and Analysis Center (AUSTRAC)

Weijers, Johan, Chief Co-financing and Partnership Section, UNODC

Werner, Nelson, Assistant Attorney General, Independent Counsel, Director Financial Intelligence Unit, Palau

Willemse, Johann Phillip (with Knorx Molelle, Director of Public Prosecution), Chief Investigator, National Prosecution Authority of RSA, South Africa

Williams, Bob, Head, Financial Intelligence Unit (FIU), Cook Islands

Yamada, Narumi, Senior Programme Officer, Quality Control and Oversight Unit, former Representative Viet Nam Office, UNODC

Yerniyazova, Dinara, Project Assistant, UNODC Programme Office in Astana, Kazakhstan

Zulu, Aaron, Commissioner, Drug Enforcement Commission, Zambia

I. Evaluation mission schedule

Mission	Location	Date	Activity
Asia Pacific Group on Money Laundering (APG) Meeting	Singapore, Singapore	July 10-16	observation of plenary meeting of the Asia Pacific region FSRB (APG); interviews with APG beneficiary countries and counterparts, GPML mentors and regional partners
Country case study	Hanoi, Vietnam	July 16-21	interviews with country counterparts and beneficiaries, partner organizations and mentor and field UNODC staff
Briefing and Interview mission	UNODC Vienna, Austria	July 19-23	interviews with UNODC officials and donors knowledgeable about GPML
Asset Recovery Inter-Agency Network for Southern Africa (ARINSA) Meeting	Pretoria, South Africa	July 26-27	interviews with ARINSA beneficiary countries and counterparts, GPML mentor and regional partners; observation of the ARINSA meeting
Country case study	Windhoek, Namibia	July 28-30	interviews with field UNODC staff, mentors and advisors and country counterparts and beneficiaries
Interview mission	Ottawa and Toronto, Canada	Aug 11-16	interviews with partner organisations and donor
Interview mission	Buenos Aires, Argentina	Sep 5	interviews with partner organisation
Interview mission	Washington DC and New York, USA	Sep 13-15	interviews with partner organisations and donor representatives
Interview mission	Nairobi, Kenya	Oct 1	interviews with country counterparts and beneficiaries and field UNODC staff
Country case study	Astana, Kazakhstan	Oct 18-22	interviews with country counterparts and beneficiaries, partner organizations and mentor and field UNODC staff; observation of mock trial training
Financial Action Task Force (FATF) Meeting	Paris, France	Oct 18-20	observation of FATF meeting, interviews with partner organisations
Interview mission	The Hague and Zoetermeer, the Netherlands	Oct 21;29	interviews with partner organisations and counterparts

J. List of reference documents

2004 - 2009 GPML Annual Activity Report
Asset Recovery and Legal Barriers Draft Handbooks
Computer Based Training (CBT) Beneficiary List
Computer Based Training (CBT) Map and List of Centers
Computer Based Training (CBT) Modules
Counter-Terrorism and Capacity Building Program (CTCBP) funded by the Government of Canada / FIU Analyst Regional Training Funding Proposal
Counter-Terrorism Implementation Task Force (CTITF) Report
Crime Congress (April 2010, Brazil) Money Laundering Working Paper
Draft – Thematic Programme on Organized Crime [confidential – do not circulate]
Financial Instruments (USB Stick)
Financial Intelligence and Analyst Training Courses (Guide and Agenda)
GPML and Pacific Anti-Money Laundering Programme (PALP) Quarterly Reports
GPML Brochure
GPML Evaluation (Independent Evaluation Unit) 2004
GPML Mentor Monthly Reports
GPML Mentors List
GPML Mentors Map – Field Presence 2009 and 2010
GPML Mentors Programme
GPML Steering Committee draft TOR
GPML Training Feedback Questionnaires and Analysis
GPML Websites
Model Legislation on Money Laundering and Financing of Terrorism (Civil Law)
Model Provisions on Money Laundering / Terrorist Financing (Common Law)
Money Laundering Overview (UN Conventions and International Standards)
Non-Substantive Project Revisions GLOU40 (2009-2010)
Performance Indicators Report (July – December 2009)
Politically Exposed Persons (PEP) Report
PPT for Donor Briefing 2009
ProFi - Project Progress Report - TCGLOU40PML (22 Jul 2010)
ProFi Financial Information GLOB79 and GLOU40
Project Document GLOU40 (2008)
Project Document/ Description GLOB79 (2003)
Project Revision GLOB79 (2007)
Regular Budget Information 2010
Semi-annual 2009 Project Progress Report (GLOU40)
Substantive Project Revision GLOU40 (2009)
UN General Assembly Special Session (UNGASS) and CND Working Papers
UN Resolutions (Security Council / General Assembly)
United Kingdom Department for International Development (DFID) Documents
UNODC Organizational Structure Charts

K. Logical framework used in the evaluation

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

Specific Objective 1: Legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector aware of the negative economic and social impact of money-laundering and the financing of terrorism.

Output	Outcomes	Performance indicator	Source of data	Method of collection
Output 3: AML/CFT policies and institutional frameworks, and possible links with existing anticorruption, good governance and antiterrorism policies reviewed and developed; Mentoring	AML/CFT regulatory and supervisory frameworks developed and implemented by financial and supervisory authorities and the private sector using UNODC-provided information or services of mentors	Number of regulatory frameworks developed using UNODC information or mentoring	- Reports to the CND on the number of Member States criminalizing money laundering produced; interviews and survey results used to identify direct links between assistance provided/ model laws used and amendments or laws passed	Content analysis; interviews with beneficiary jurisdiction; beneficiary survey results
Output 4: Reports to the Commission on Narcotic Drugs (CND) on the progress made by Member States to comply with the requirements of the UN Plan of Action to counter money laundering provided;	CND adopts resolutions taking into account reports.	Extent to which CND uses the report by taking into account negative economic and social impact of money-laundering and the financing of terrorism.	Resolutions of the CND	Content analysis
Output 5: Basic information on money laundering	Increase in the number of persons using the CBT	Number of officials provided with computer	Users of the CBT	Sample survey

provided and the proceeds of crime through the dissemination of the computer-based training (CBT) programme identified		based training (CBT) programme, that use the training		
Advice and information on how to establish a CBT centre	Increased number of CBT centres	Number of CBT centres established;	Internal records	Review of records
Output 6: The online International Money Laundering Information Network (IMoLIN) maintained and upgraded;	IMoLIN used by intended users	Number and duration of visits and hits to the website.	Comments made by IMoLIN partner organizations on the annual report of IMoLIN produced by GPML; Records of the IMoLIN	Content analysis
Output 7: Studies on the vulnerability of informal economies to money laundering and the financing of terrorism carried out.	Studies are used other organizations	Extent of use	Internet Search	Content analysis
Specific Objective 2 (Former Outcome 2): Knowledge and expertise to combat money-laundering and the financing of terrorism effectively applied by legislative bodies, criminal justice officials (FIU personnel, law enforcement agencies and their personnel, anticorruption agencies officials), supervisory and regulatory authorities and the private sector				
Training on AML/CFT legislation	AML/CFT Legislation developed by trained legislators and legislative personnel;	Extent to which legislation is developed by persons trained by the project-	Trainees	
Training courses, expert groups, mentoring	Former Output 1: Target groups participating in the projects activities have a higher level of awareness	Extent to which awareness has changed over time	Participants since 2007	Sample survey

	on germane aspects of money laundering and the financing of terrorism;			
Output 2: Expert group meetings on specialized and complex aspects of AML/CFT issues conducted;	AML/CFT strategies and policies developed by criminal justice officials who participated in or read the reports of the expert group meetings and integrated into relevant strategies and policies;	Number of AML/CFT national action plans developed, reviewed and finalized by participants	National reports and observations	Content analysis
AML/CFT model legislation prepared Tailored-made advisory services and other technical inputs relevant to the implementation of international AML/CFT standards Number of review of national AML/CFT national legislation Number of legal advisory and needs assessment activities and legislative reviews successfully carried out	Model AML/CFT legislation adopted by legislative bodies in member-states	Number of legislative bodies that have adopted the suggested legislations	Legislative and public records Mentorees	Review of records Interviews with mentorees
Advice and information/guidelines on establishing FIU, conducting investigations, and	FIUs established, financial investigations conducted and AML/CFT cases prosecuted with	FIU established or not; number of countries that have established FIU	Public records	Review of records

prosecuting AML/ CFT cases Training programmes for judges, prosecutors, law enforcement and FIU officials trained on effective prevention, detection and criminalization of money laundering and the financing of terrorism Content of specialized services and technical assistance programmes to ensure that they adequately meet the specific needs of the recipient States reviewed on an ongoing basis	international standards applied by criminal justice officials	Number of investigations launched, cases prosecuted and conviction rate under new laws	National statistics	Comparative analysis the assumption being that if the legislations are up to international standards, detection and conviction should improve over time and that this is different from a control group with non-intervention countries.
Advice and information/guidelines on preventive measures for regulatory and supervisory authorities and private sector firms	AML/CFT preventive measures applied by regulatory and supervisory authorities and the private sector	Number of regulatory and supervisory authorities that have adopted preventive measures as suggested Extent to which private sector firms have adopted preventive measures as suggested	Public records/ interviews Firms in countries assisted	Review of records, random sample survey instrument Interviews on field missions, online survey with stratified random sample
Training materials and courses based on assessment of need and sustainability Sustainable training programmes on detection,	Member-states are self-reliant in training their regulatory, supervisory, criminal justice, and private sector	Extent to which member-states carry out their own training programmes	UNODC/ Member-state records	UNODC/ Public records (supplemented by interviews?)

<p>prevention and criminalization of moneylaundering and the financing of terrorism developed</p> <p>Mentors /advisors posted in the field providing continuous policy advice, on-the-job training, and other technical support to target groups.</p>	<p>professionals</p>	<p>Extent of policy advice and technical support provided by mentors to the target groups</p> <p>Extent of inputs provided by mentors to UNODC programmes and projects</p>	<p>Target group</p> <p>UNODC staff</p>	<p>Interviews and survey</p> <p>Interviews</p>
<p>Specific Objective 3 (Former Outcome 3): AML/CFT coordination and cooperation <i>increased</i> among Member States, International Organizations and AML/CFT regional bodies.</p>				
<p>Output that call for or organizes technical assistance coordination meetings at different levels</p>	<p>Increased Number of technical assistance coordination meetings, and results thereof</p>	<p>Number of technical assistance coordination meetings, and results thereof</p>	<p>Project records</p>	<p>Record analysis</p>
<p>Output 1: UNODC tools and services on international cooperation, mutual legal assistance, law enforcement, anti organized crime, good governance and counterterrorism promoted and disseminated;</p>	<p>Exchange of information and AML/CFT coordination among international organizations improved</p>	<p>Positive Feedback by Secretariat of the FATF and other standard setters</p>	<p>FATF</p>	<p>Interviews</p>
<p>Output 2: Inputs to the development of new</p>	<p>New mechanisms developed for facilitating</p>	<p>Number of new mechanisms developed</p>	<p>Project records Secretariats of cooperation</p>	<p>Record analysis</p>

international cooperation mechanisms provided;	international cooperation that use project outputs		agencies	Interviews
Output 3: Collaboration with the Financial Action Task Force (FATF) and other standard setters and technical assistance (TA) providers increased;	Increased number of inputs to FTF and other standard setters' AML/CFT papers, reports and studies that are used by the FATF and other Standard setters	Number of inputs to FATF and other standard setters' AML/CFT papers, reports and studies	FATF reports	Content analysis
Input to proposed joint projects	Increased Number of joint projects and initiatives with the FATF and other standard setters;	Change in the Number of joint projects and initiatives with the FATF and other standard setters;	FATF Secretariat	Record analysis Interviews
Input to the FSRBs	Output 4: The FATF-Style Regional Bodies (FSRBs) as the platforms for technical assistance coordination utilized;	Extent of utilization	FSRBs	Interviews
Output 5: Substantive inputs to the work and reporting requirements of the working group on “Tackling the Financing of Terrorism” provided.	Working group on “Tackling the Financing of Terrorism” uses inputs	Number (or proportion) of inputs that are used	Reports of the working group	Content analysis
Substantive inputs to the work and reporting requirements of the CTITF” provided	Increased use by CTITF of inputs provided	Number of CTITF working group meetings, reports produced and feedback received from other CTITF members	CTITF reports; CTITF members	Content analysis, interviews, records review

L. GPML presence in the field (December 2010)

