

Independent mid-term project evaluation of

**Supporting Measures to Combat
Corruption and Money Laundering, and
to Foster Asset Recovery, in Egypt**

**Under the
European Union's ENPI/2008/019-06
Programme for Egypt**

Project EGYX49
EGYPT

August 2013



UNITED NATIONS
New York, 2013

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EXECUTIVE SUMMARY

This is an independent mid-term project evaluation of UNODC Project EGYX49 “Supporting Measures to Combat Corruption and Money Laundering, and to Foster Asset Recovery, in Egypt”. This three year project began in August 2011 and has a total budget of USD 4,298,664 supported by pledges from the governments of France, Romania and, for the greater part, by the European Union (under the ENPI/2008/019-06 Programme for Egypt). In December 2012 the project was expanded to include additional activities related to asset recovery. This was in response to a national request and the recognition that recovering assets is a priority for the Egyptian people. Further activities were added in summer 2013 related to study trips to Romania and a review of case management software developed by UNODC in Vienna.

Despite a strong raft of laws against corruption, a number of competent authorities mandated to enforce them, and ratification of the UN Convention Against Corruption in 2005, the phenomena of corruption, money laundering and asset recovery remain of serious concern in the Arab Republic of Egypt. Over the years there has been a good deal of international support and technical assistance offered to Egypt in the cause of integrity and anti-corruption – notably by UNDP who set up the Transparency and Integrity Committee (in 2007) and have recently signed a project to support the National Coordinating Committee for Combatting Corruption (NCCCC) through the Ministry of Justice.

The uncertainty and instability created by recent frequent changes to the Egyptian government have undoubtedly played their part in delaying effective national action against corruption, but progress has nonetheless been sluggish at best. Reasons for this slow progress have been variously given by national interlocutors as a lack of coordination between competing government agencies, weaknesses in the criminal procedure code, inertia endemic to government structures, and even due to a failing of ‘national character’. However, several interlocutors felt that things had definitely improved since the January 2011 revolution.

Following the events of July 2013, it was necessary to adapt and amend the evaluation methodology and the subsequent imposition of a State of Emergency and Curfew led to the assessment mission being cancelled at short notice. However, the evaluation proceeded with a mixture of face-to-face meetings in Vienna and Skype/phone interviews with persons in Cairo.

A survey on project engagement (in both English and Arabic) was successfully delivered by email to 41 representatives¹ of national counterparts (including civil society organisations), but the response rate of only 17% (n=7) did not constitute a large enough sample to yield any statistically significant insights.

The design of Project EGYX49 calls for considerable effort to be expended in supporting certain national coordination committees. Experience to date has not shown such committees to be productive or dynamic in their output. A similar conclusion may be drawn regarding the multiple sessions held in support of the (postponed) UNCAC Self-Assessment and the overhaul to the (incomplete) National Anti-corruption Strategy and Action Plan in July 2013. These are activities that are the responsibility of national government and there is little that UNODC can do to influence the rate of progress. In the recent EU Court of Auditors Special Report No 4/2013 ‘EU Cooperation with Egypt in the field of Governance’² the criticism was levelled that the European Commission “did not use budget support to

¹ This total consists of the initial 39 mailings plus 4 additional emails, less those notified as ‘failed’.

² Available at <http://eca.europa.eu/portal/pls/portal/docs/1/22592778.PDF>. See paras Vi-VIII and 20. The Commission’s reply starts at p38 with p39 especially relevant.

directly address corruption although this was common practice in other countries.”³ The exercise of soft power in this way is a matter for the Commission and outside the implementation decisions of this project team.

The project document describes many of its deliverables in vague comparative terms (‘enhanced’, ‘raised’, ‘supported’, ‘strengthened’, ‘improved’) which means they are, at least in the specific terms of this project, achievable with very minor effort. Given the extremely challenging operational environment, this wording may have been an understandable precaution, but it also means that measuring performance against the project document is not a worthwhile exercise.

Project EGYX49 is highly relevant to the Arab Republic of Egypt and its stated objective has been welcomed as much needed by national interlocutors. The project team, and in particular the project coordinator, have been praised for their flexibility and perseverance in the face of political uncertainty and changing emphasis. However there has been some specific criticism concerning a perceived lack of engagement and sharing of information among the full range of partners (it was said that the Steering Committee should be used more extensively in this regard).

The components added on asset recovery were universally welcomed and felt to be useful by national counterparts, but expectations do need to be managed here. Asset recovery procedures can be highly complex and often do not result in the imagined financial returns. That being said, it was an important and popular initiative if only in terms of morale and political support.

There appears to have been a departure from best procedure in terms of sourcing case management software. UNODC’s own goCASE appears to have been identified as the preferred option before any needs assessment or the drawing up of specifications or of consideration of available alternatives. Other versions of case management software do exist and without an objective and adequate needs assessment, it is not possible to say whether goCASE is the best value option for the Arab Republic of Egypt. Indeed, more than one interlocutor claimed that their work is paper-based suggesting that the extent and nature of IT infrastructure and concomitant working practices should first be properly considered.

In terms of partnership working, it has already been mentioned that some interlocutors felt that their voices were not being heard, but of more potential concern is the duplication that appears to have arisen between UNDP and UNODC efforts. Further details are given in the main body of the evaluation report.

The project had a slow start and changes to the project team will not have helped in coping with a less than effective government bureaucracy which is experiencing such profound upheaval. Safeguards will be needed to prevent the loss of the project coordinator in October 2013 from acting as a brake on the increased pace of activity apparent since early 2012.

Among the more active of interventions has been training in law enforcement skills. The Basel Institute’s series of courses is also aimed at identifying suitable candidates to be national trainers and ticks all the boxes for best practice and structure. And yet two interlocutors felt the need to criticise the material for being too academic or abstract and stated they wanted more practical advice such as the sharing of experience offered by the StAR initiative’s workshop. However, the results of the student satisfaction surveys generated by the Basel Institute’s classes suggest a very high degree of contentment.

One clear example of a positive outcome has been in training on how to prepare requests for mutual legal assistance in financial crime and asset recovery matters. It was stated that such requests were previously being rejected out of hand because they did not contain the level of detail required under international rules. Training has helped national counterparts to understand these deficiencies and to rectify them.

³ Ibid Paragraph 77.

The project team should learn from such successes and cultivate similar activities by which to maximise project impact and to add real value. The original project design appears to have suffered from a lack of environmental scanning which would in all likelihood have alerted the project author to the presence of pre-existing coordination mechanisms, the solid legal framework and similar support from sister organisations. Refocusing effort towards directly providing anti-corruption and anti-money laundering technical assistance (instead of supporting bodies or instruments that may possibly in the future eventually coordinate such efforts) would significantly enhance the value of this project and the return on investment. Consequently, with an implementation rate of only 25.4 % in August 2013, it is both reasonable and desirable to extend this project for a further phase of 12 months in order to undertake such activities.

Perhaps the most significant project impact so far has been in keeping the various components of anti-corruption at the forefront of government consciousness during a period of momentous change and upheaval.

SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS

Findings ⁴ : problems and issues identified	Evidence (sources that substantiate findings)	Recommendations ⁵
Key recommendations		
<p>The effort involved in providing coordination to national committees has not been productive despite multiple meetings.</p>	<p>Neither the Transparency and Integrity Committee (established 2007) nor the National Coordinating Committee for Combating Corruption (NCCCC), both of which pre-date project EGYX49, have had clearly demonstrable outcomes. There is no indication that this situation is likely to change for the last remaining 12 months of the project. Another new coordinating committee was proposed in the suspended constitution. UNDP has recently signed an agreement to provide support the NCCCC. Further coordination from UNODC would be duplication. Sources for findings: desk review and interviews.</p>	<p>The project team should reduce activities related to coordinating further the various committees mentioned in 1.1, 2.1 and 3.1 of the project plan. Expert advice can still be offered as requested and required.</p>
<p>Sufficient support has already been provided for the UNCAC Self-Assessment process.</p>	<p>The UNCAC Self-Assessment is a treaty obligation to which the government is committed with or without this project. The checklist is not onerous or complicated. Three separate training inputs have already been provided. Sources for findings: desk review and interviews.</p>	<p>The project team should reduce support to the UNCAC Self-Assessment <i>under this project</i>.</p>

⁴ A finding uses evidence from data collection to allow for a factual statement.

⁵ Recommendations are proposals aimed at enhancing the effectiveness, quality, or efficiency of a project/programme; at redesigning the objectives; and/or at the reallocation of resources. For accuracy and credibility, recommendations should be the logical implications of the findings and conclusions.

<p>Efforts in coordinating meetings on the National Anti-Corruption Strategy and Action Plan have yet to produce any sustainable, robust or complete results.</p>	<p>These documents are owned by the Arab Republic of Egypt. National commitment to a National Anti-corruption Strategy pre-dates this project.⁶ The draft documents were substantially reworked in July 2013 reflecting a different direction and priorities to those established by national counterparts in December 2011. Substantial advice and expert input has already been provided. It is up to the government of Egypt to take this matter forward. Sources for findings: desk review and interviews.</p>	<p>The project team should reduce commitments related to further coordination of the National Anti-corruption Strategy and Action Plan. Expert advice can still be offered as requested and required.</p>
<p>Project EGYX49 needs to be refocused to provide further practical and operational support on implementing the existing legal framework.</p>	<p>All interlocutors agree that the weakness in the anti-corruption framework is in its implementation. Professional interlocutors felt that they required more skills and knowledge development. Several interlocutors raised awareness and education as key areas for development. Sources for findings: desk review and interviews.</p>	<p>The project team should concentrate on providing technical assistance in those areas of concern already highlighted by national counterparts and international assessment.</p>
<p>The planned activities related to the provision of case management software and computerisation are premature and have yet to be justified by a proper business case. Best practice in procurement appears to have been short circuited.</p>	<p>Several interlocutors stated they work in a paper-based system. No, or no proper, needs assessment appears to have been conducted. An assessment conducted in early 2013 merely reviewed national suitability for UNODC goCASE software. Other options have not been fully investigated or at all. Best practice requires procurement against specification for best value. UNODC is committed to promoting best practice. Sources for findings: desk review and interviews.</p>	<p>The project team should arrange for an objective needs assessment regarding computerisation and software solutions before, undertaking an open procurement procedure</p>
<p>A comprehensive and inclusive communication strategy with national</p>	<p>Some senior national interlocutors felt that there was insufficient consultation</p>	<p>Having established a Steering Committee, the project team should fulfil the committee's</p>

⁶ See for instance the Chairman's report of the Workshop On "Best Practices for Achieving Transparency and Integrity in the AMED Countries" Cairo 6 – 7 December 2009.

counterparts is lacking.	and information from the project team about intentions and activities. Sources for findings: desk review and interviews.	legitimate expectations by keeping the members regularly informed.
There is still a need for further and substantial technical assistance in countering corruption, anti-money laundering and asset recovery.	Implementation has been affected by the sudden changes in regime and government. Several major interventions are still to be completed. The implementation rate is only 25.4 % after almost two years. National counterparts are eager for the project to proceed. The major donor has expressed support for extension. Sources for findings: desk review and interviews.	UNODC should extend the project for 12 months.
Important recommendations		
There is a perception that training provided (in particular that of the Basel Institute) concentrates too much on theory and does not meet the practical needs of the participants	Several national interlocutors felt training provision would be enhanced if subjects and curriculum were checked with national counterparts to establish need and whether it was appropriate to the target audience. The project team, however, state that relevant counterparts were fully consulted. Sources for findings: desk review and interviews.	The project team should ensure the results of consultation with national counterparts on training needs and on the content of training courses are fully communicated to the steering committee.
The Basel Institute programme to develop trainers in the field of financial investigation is consistent with best practice, but this approach is not being duplicated in other training.	A clear example of the lack of skills continuity in specialist areas due to political whim has been given. This means that medium and long term training impact is vulnerable. A national training capacity will mean that national counterparts will be able to refresh the skillset of newly appointed specialists. Sources for findings: desk review and interviews.	The project team should continue to develop and expand national training capacity rather than deliver one-off training inputs.
The Ministry of Interior,	Key project activities impact	The project team should

<p>police and customs are noticeable by their absence in key inputs including those where strategic matters directly affecting their interests have been discussed.</p>	<p>on the performance of the Ministry of Interior, police and customs, but a review of attendance sheets from seminars and workshops show they are not fully involved in the development of those activities. Sources for findings: desk review and interviews.</p>	<p>continue with efforts to involve more closely the Ministry of Interior, police and customs.</p>
<p>Civil society organisations have not been included to any significant extent in discussion on substantive requirements</p>	<p>The role and engagement of civil society has been rightly highlighted as a priority (see Project Document paragraph 2.1), but attendance sheets show participation has been limited to peripheral activities. Direct involvement would not only help bring a wider perspective to legal and enforcement issues, but it would also build the confidence of civil society in the undervalued efforts of government and law enforcement. Sources for findings: desk review and interviews.</p>	<p>Wherever possible, the project team should <u>directly</u> engage civil society in discussion and debate with government counterparts on substantive issues.</p>
<p>There appears to be a difference of perception between the various criminal justice actors on the contribution that others make or can potentially make to the overall effort against corruption, money laundering and asset recovery.</p>	<p>Some interlocutors felt that other agencies were being given too much prominence or that their own agency was not being given the profile it deserved. Sources for findings: desk review and interviews.</p>	<p>When organising training, the project team should continue to try to bring different types of professionals together where appropriate.</p>
<p>Apart from activities conducted by the Basel Institute, there are no measures in place to assess quality in training provision.</p>	<p>Student surveys and testing are already undertaken by the Basel Institute and provide a way to measure quality of training. Similar documentation for other events is lacking. Sources for findings: desk review and interviews.</p>	<p>The project team should use satisfaction surveys for the full range of training and workshop activities and consider pre- and post-testing.</p>
<p>Many of the deliverables in the project document are not well formulated and do not comply with S.M.A.R.T. criteria.</p>	<p>The project document (including the amendment in 2011 and addition in summer 2013) offers less than resilient outcomes that are beyond the ability of UNODC to deliver. Some outcomes (Outcome 2 on an anti-corruption</p>	<p>Those responsible for developing project documentation should define the project as far as possible in terms of deliverables that are within the scope, influence and ability of the project team to achieve.</p>

	<p>framework) and outputs (1.1 on establishing a National Committee) were in place before the project began. Still other deliverables provide an excessively low threshold for achievement using comparative terms such as ‘enhanced’, ‘raised’, ‘supported’, ‘strengthened’ and ‘improved’). This is sometimes due to terms and expectations imposed by donors. Sources for findings: desk review and interviews.</p>	
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I. INTRODUCTION

Background and context

UNODC Project EGYX49 “Supporting Measures to Combat Corruption and Money Laundering, and to Foster Asset Recovery, in Egypt” was formally signed on 11th August 2011 with the Ministry of State for Administrative Development signing on behalf of the Arab Republic of Egypt. The project has a total budget of USD 4,298,664 supported by pledges from the governments of France (USD 70,000) and Romania (USD 80,000), but by far the largest contribution (USD 4,148,470) is provided by the European Union’s ENPI/2008/019-06 Programme for Egypt. The project is rightly regarded as an EU initiative and consequently the EU Delegation in Cairo, as a principal stakeholder, plays an active role in monitoring project performance. The project was developed in the aftermath of the January 2011 revolution which saw the 20 year Mubarak regime swept away in a popular uprising. The interim administration was then replaced in June 2012 by the elected government of Mohamed Morsi which was itself deposed in July 2013 by military forces in a move welcomed by some, but which has split public opinion. This independent mid-term project evaluation was commissioned in June 2013 while the Morsi government was still in power. By the time the evaluation took place a new interim administration was and is governing the country.

Corruption was cited by the Egyptian people as one of the greatest grievances precipitating the 2011 revolution,⁷ but the Arab Republic of Egypt had already signed the United Nations Convention Against Corruption (UNCAC) in 2003 and ratified it in 2005. By 2011, the Arab Republic of Egypt already possessed a strong legal framework outlawing corrupt criminal behaviour, had created a number of competent national authorities with specific mandates to address corruption (including the Administrative Control Authority established in 1964, the Illicit Gains department of the Ministry of Justice, the Public Funds Investigation Department of the Ministry of Interior and the Egyptian Financial Intelligence Unit (FIU)) and had established administrative arrangements for coordination such as the Transparency and Integrity Committee (with support from UNDP) and the National Coordinating Committee for Combating Corruption (NCCCC). Yet despite these strong laws and multiple administrative efforts the Arab Republic of Egypt has been characterised as suffering from endemic corruption.

According to UNODC’s Victimization Survey in Egypt (2009)⁸, of 3,126 households surveyed, 17.7% of respondents had paid a bribe to a government official, but only 1.3% of cases of corruption were reported to police. In the 2012 Transparency International Perception Index, the Arab Republic of Egypt scored 32

⁷ See for instance <http://www.opendemocracy.net/marc-michael/tackling-corruption-in-revolutionary-egypt> or <http://www.theguardian.com/global-development/poverty-matters/2011/feb/17/what-caused-egyptian-revolution> as well as the Terms of Reference for this evaluation.

⁸ http://www.unodc.org/documents/data-and-analysis/dfa/Egypt_victimization_exsum.pdf accessed 27 August 2013

(where 0 is perceived as highly corrupt and 100 as 'very clean') alongside the Dominican Republic, Ecuador, Indonesia and Madagascar.⁹

Egypt has been involved in a number of international initiatives and projects aimed at strengthening integrity and fighting corruption. They include the MENA-OECD Task Force on Anti-Bribery, OECD Good Governance for Development in Arab Countries Initiative, the Arab Anti-Corruption and Integrity Network (ACINET), and the UNDP-POGAR project supporting the Ministry of Investment in the fight against corruption.

Evaluation methodology

The evaluation methodology was severely affected by the enforced replacement of the Morsi government with a new interim administration in July 2013. The ensuing disruption and unrest prompted a national state of emergency and a curfew as well as a comprehensive travel warning coupled with enhanced UNDSS security arrangements. Not only was the evaluation mission cancelled, but, some potential interlocutors became occupied with other priorities and in many cases were absent from their offices for extended periods. The evaluation therefore proceeded in an amended format.

The first stage in the evaluation process involved a desk review of project documentation provided by the project team supplemented by open source research. The internet yielded further documents that assisted with additional context and comparative data on the state of corruption in the Arab Republic of Egypt. Additional documentation was provided by the project coordinator or otherwise obtained later during the evaluation.

In advance of the proposed mission a survey on project engagement was provided to 41¹⁰ representatives of national counterparts and relevant civil society organisations. The survey was provided in both Arabic and English and re-submitted with a reminder shortly before the deadline. By the date of this report, only 7 replies had been received. These limited results have been collated and are reproduced at Annex II.

In addition, meetings with relevant UNODC headquarters staff were held on 6th August 2013.

The evaluation mission planned for 18th August 2013 was cancelled on 15th August 2013 due to the security situation. At this stage consideration was given to postponing the mission, but due to other commitments and the urgent need for management decisions on this project, it was decided to continue with a mixture of telephone/Skype interviews and face-to-face meetings with interlocutors visiting Vienna for other purposes. The said interviews were conducted between 19th and 29th August and included a full day with the project coordinator and individual meetings with representatives of two national agencies (a third meeting was cancelled as a consequence of the national situation). It was possible to arrange and conduct 7 telephone/Skype interviews with interlocutors in Cairo.

Given the current national emergency and security priorities affecting the Arab Republic of Egypt it is completely understandable why there were so few members of government departments available for telephone or Skype interview.¹¹ This factor has of course had a negative impact on the quantity and depth of data available for this evaluation. However, it should also be noted that the survey transmitted in support of this evaluation before the national emergency only achieved a 17% response rate suggesting a less than enthusiastic engagement in the evaluation process.

⁹ <http://cpi.transparency.org/cpi2012/results/> accessed 29 August 2013.

¹⁰ As stated above, 41 constitutes the final number of submissions after taking into account failed email deliveries.

¹¹ Interlocutors also had the option of responding by email.

II. EVALUATION FINDINGS

Design

It was not possible to identify the person who originally designed the project and those currently involved were not in a position to describe the thinking behind the inclusion of its outcomes and activities. In general, interlocutors (UNODC staff as well as stakeholders) were happy with the project concept as something desirable and beneficial for the Arab Republic of Egypt.

The project objective is given as:

An effective mechanism established to combat corruption and money laundering in Egypt, to foster asset recovery procedures, as well as a solid framework for the implementation of the United National Convention Against Corruption.

The scope of this objective would appear to be more akin to a programme than a project and, when analysed, the above wording may be said to contain four substantial components:

- To establish an effective **mechanism** to combat corruption;
- To establish an effective **mechanism** to combat money laundering;
- To **foster** procedures for asset recovery;
- To **foster** (or establish?¹²) a **solid framework** for the implementation of UNCAC.

In reality, the main thrust of the project is directed towards developing a *system* of anti-corruption rather than a single mechanism. Those responsible for implementation also have to decide what 'to foster' means in terms of measuring success.

The project team might like to reconsider the resources allocated to assisting the Arab Republic of Egypt in its UNCAC self-assessment exercise (under the UNCAC Implementation Review Mechanism). There have been 3 workshops conducted to assist the government in completing the self-assessment checklist. This self-assessment is a national commitment arising out of its UNCAC treaty obligations and, while there may be networking and other marketing opportunities generated by such workshops, there is a question mark over whether they are really an effective use of resources for such a simple process.

The project commits to 4 outcomes:¹³

- | | |
|------------|--|
| Outcome 1: | National anti-corruption strategy developed and implemented including anti-money laundering and asset recovery; |
| Outcome 2: | National legal framework on anti-corruption, anti-money laundering and asset recovery established; |
| Outcome 3: | Institutional capacity to combat corruption and money laundering and to recover stolen assets enhanced; |

¹² The wording of the objective can be read both ways.

¹³ Compare with the 4 components contained the project objective.

Outcome 4: Public **awareness** on the negative effects of corruption and money laundering raised.

It should be noted that delivery of Outcomes 1 and 2 is heavily dependent on third parties. In reality, the project team can only ever hope to provide the *opportunity* for the government to achieve these outcomes rather than achieve them by their own efforts.

Output 1.1 relates to establishing a 'national coordinating committee' but such a committee was already established even before the project was signed. In fact two national committees predate the project: the Transparency and Integrity Committee (supported by UNDP) and the National Coordinating Committee for Combatting Corruption (NCCCC). EGYX49 works with the NCCCC, but a UNDP newsletter dated March 2013 states that UNDP have now signed a project with the Ministry of Justice also to provide support to the same coordinating committee¹⁴. Comments were received during the evaluation to the effect that neither of these committees were very productive before 2011. It is unclear from the project design how they might be encouraged to be more productive afterwards.

Review of the UNDP project document 'Strengthening Transparency and Integrity in the Civil Service', Award Number 00056788 dated 2009 (extended to 2013)¹⁵, shows that many of the intentions behind EGYX49 were already being targeted under that UNDP initiative. These include assistance and coordination for the development of the National Anti-Corruption Strategy (Activity Result 3). Thus there are two sister UN agencies both engaged in supporting the National Anti-Corruption Strategy and the NCCCC.

Core Learning Partners including those from civil society, were consistent in expressing the view that the Egyptian legal framework against anti-corruption is well drafted and comprehensive ('lacking only one or two provisions'). Indeed, one stated that the Arab Republic of Egypt has 'the best arsenal of laws in the world'. This is also borne out by the findings of a UNCAC Gap Analysis conducted by the Social Contract Centre in 2010. This analysis would appear to be comprehensive and suggest that, in addition to criminalising the main UNCAC corrupt behaviours, legislation already covers: punishments for exploiting public office (p56), taking undue advantage (p108) and abuse of position (p112); enforceable standards of conduct (p57); declarations of interest (p59); prohibition on accepting gifts (p61) and illicit gain for oneself and one's family (p114); making a financial statement and asset disclosure (p116). In respect of the freezing, seizure and confiscation of assets, the analysis concludes that such procedures are already considered part of the law of the Republic of Egypt following the adoption of UNCAC in 2005 (pp. 152/3), but that asset recovery is 'subject to the State authorities' discretion' (p220).

Since this gap analysis was compiled by someone who worked with the project as a national project officer until 2013, it is reasonable to expect it to have informed the design and further development of the project. However, the gaps identified in the Social Contract Centre document are clearly rooted in implementation and enforcement while Outcome 2 of Project EGYX49 ignores this in favour of establishing a national legal framework which the experts say was already in place.

¹⁴ http://www.un.org/eg/pdf/37_United%20in%20Egypt%20issue%2033%20March%202013.pdf (accessed 10 September 2013).

¹⁵ Project Document available at: http://www.undp.org/Portals/0/Project%20Docs/Gov_Pro%20Doc_Strengthening%20Transparency%20and%20Integrity%20in%20the%20Civil%20Service.pdf accessed 21st August 2013

Further evidence of this anomaly can be found in: a Chatham House workshop report¹⁶; section 1.3 of the first iteration of the UNODC draft National Strategy document from 2011 and section 9 of the expert report, 'Assessment of the Effectiveness of Existing Anti-corruption Public Complaints and Reporting Mechanisms and Provision of Recommendations to Increase Public Awareness'. All these sources attest to a pre-existing framework of relevant legislation and anti-corruption bodies. The anti-corruption bodies include the Illicit Gains Department, Judicial Committee for Asset Recovery; Anti-corruption Coordinator; Money Laundering Combating Unit (FIU);¹⁷ Department of Illegal Gains and the Public Funds Investigation [sic]. The project document itself also refers to pre-existing legislation and regulation including: Law No. 80-2002 on Combating Money Laundering (as amended); Banking Law 88-2003; the Executive Regulations of the AML/CFT law; and, (since the Arab Republic of Egypt has an accredited FIU), the Financial Action Task Force (FATF) Recommendations through MENFATF.¹⁸

Taking the above information as a whole it is hard to avoid the conclusion that insufficient attention was paid to researching the business case or that environmental scanning was not applied to decisions on project content.

The role of a project plan and logical framework (logframe) is to show how a project will achieve its objective. Best practice encourages the use of a detailed work plan populated by Specific Measurable Achievable Relevant and Time-limited (SMART) objectives, outcomes and outputs. In this project document, the use of comparatives for defining outcomes and outputs sets the criteria for success at a very comfortable, but excessively low threshold. Examples include:

Outcome 3	'Institutional capacity <i>enhanced</i>
Outcome 4	'Public awareness <i>raised</i>
Output 1.3	'Implementation <i>supported</i>
Output 3.1	'Capacity <i>enhanced</i>
Output 3.2	'Reporting and/or complaints mechanisms <i>strengthened</i>
Output 3.4	'Coordination <i>improved</i>

With such wording, it is very difficult not to achieve the outcomes (e.g. 'Has implementation been 'supported'? Yes.'). but measuring true quantitative and qualitative worth in this way is less than robust.

A close review of the logframe for EGYX49 shows that some entries are misplaced and/or are unclear. For example: 'Pilot database for stolen assets and corruption case management system developed tested and operational' is given as a means of verification, but this wording is closer to an output. A Means of Verification for this activity would read something like 'proof of concept report' or 'technical certificate of operation'. Likewise 'Providing trainings' and 'Organising seminars, conferences and missions abroad' do not help to verify the indicators against which they are placed.

Relevance

The relevance of a project can be considered by reference to its subject matter as well as by the relevance of the various interventions to that subject matter.

¹⁶ Chatham House Middle East and North Africa Programme: Egypt Dialogue Workshop Summary 'Defining and Tackling Corruption' (February 2012) p12

¹⁷ <http://egmontgroup.org/about/list-of-members/by-region/africa>

¹⁸ See for instance the mutual evaluation report on AML by the World Bank 2009 available at http://www.menafatf.org/images/uploadfiles/mer_egypt_forpublication.pdf

As described above, corruption is at the forefront of national interests and any project concerned with those interests is de facto highly relevant.

The strengthening of the asset recovery component in 2012 was an understandable addition. Several interlocutors have mentioned keen public interest in recovering money allegedly salted away by prominent members of the pre-2011 government. However, expectations also need to be managed. In practice the recovery of assets is not easy to achieve and, very often, neither is it cost-effective. The decision to include the component within an existing project, rather than starting a new one, makes sense from a practical and administrative point of view. However, asset recovery might sit more easily in a separate project structure alongside as separate project anti-money laundering. Although corruption will often involve money laundering, money laundering and asset recovery as phenomena actually have a far wider reach cutting across crime issues.

It is also necessary to comment on the activities under Output 3.6. These activities may 'foster asset recovery procedures' in general terms, but no gap analysis on which those activities are based has been forthcoming. The IT component provides for a feasibility study on establishing an automated common database (Activity 3.6.7) and something described as 'fact finding mission' took place on 12-14 February 2013. The documentation provided, however, suggests that this mission was primarily directed towards providing UNODC's self-developed goCase solution. Indeed, in August 2013, representatives from selected counterparts were invited to Vienna to view the software in action. National interlocutors have stated that most of their work is paper based, with data from outside agencies arriving in a variety of paper formats. How does this impact on the feasibility of this Output? In addition, ambitions related to on-line connection to databases of organisations like Europol are both technically and procedurally highly challenging (entailing for instance, strong regulation protecting personal data).

Any procurement process should be fully transparent and should review all possible software options in terms of suitability and economy. A business case is also required to assess whether national procedures and practices are ready for a common database.

Efficiency

Almost all interlocutors were keen to stress that the project team, especially the current project coordinator, has been successful in negotiating the highly challenging political circumstances prevailing in the Arab Republic of Egypt today. Team members were described as flexible and responsive in the face of uncertain engagement from some national counterparts and praised also for persevering when opportunities for progress have been heavily constrained by policy and personality changes within counterpart institutions. Since the project coordinator joined the project, there has been a noticeable increase in project activity.

UNODC staff in Vienna also praised the extent to which the project team was liaising with HQ experts ('more than any other field office'). The UNODC ROMENA's Programme Coordination and Analysis Unit was suggested by one HQ official as a model that should be duplicated elsewhere. No concerns were expressed or noted over the submission of reports, documentation or interaction between HQ and field operations.

Cooperation between Cairo and members of the Corruption and Economic Crime branch at UNODC HQ in Vienna has not only involved experts from Vienna travelling to Egypt to lead and moderate workshops, but also the provision of practical advice and guidance to the project team.

Specialist training has been delivered in a cost effective way through the Basel Institute of Governance and, notwithstanding the security situation, that particular programme of training is broadly on schedule. There is also reference to workshops on mutual legal assistance (24-26 April 2012), with the Stolen Asset Recovery (StAR) initiative (13-14 November 2012) and a 'Technical Advisory meeting' on asset recovery (12-13 January 2013). These all refer to the provision of core skills and have been delivered broadly in line with the work plan.

The three meetings on the National Strategy (6-7 December 2011, 16-18 September 2012 and 23-25 June 2013) complied with commitments under the work plan, but have not yielded useful or consistent draft documents. This is a likely consequence of the constraints imposed by changes in government counterparts and their lack of clarity of current political thinking. Consequently Output 1.3 on supporting implementation of the strategy between Q2 of Year 2 to Q1 of Year 3 has not been possible.

There was also a meeting on complaints and reporting mechanisms (22 May 2012), a fact finding mission on complaints (19-20 September 2012) followed up by a workshop with the Administrative Control Authority on implementing the recommendations related to the complaints mechanism (16-20 December 2012). This displays some thought and structure in terms of implementing Output 3.2 ('Reporting and/or complaints mechanisms on corruption strengthened') of the project plan, but activities under 3.2.4 on support for establishing complaints mechanisms do not appear to have been undertaken in Year 2 as planned (although the timeframes shown for 3.2.1 and 3.2.2 seem out of line with those shown for 3.2.3 and 3.2.4).

A minority of national interlocutors did express reservations about the way in which the project has been working with national counterparts (the term 'lack of transparency' was used). Having created a steering committee, there was a legitimate expectation that the steering group would be used for reflecting on strategic decisions and would be kept regularly informed about events. It was claimed that this was not the happening. However, the project team felt that the steering committee as constituted did not prove itself to be an effective forum for consultation and that the interests of the work plan were better served by coordinating directly with stakeholders such as the Ministry of Justice (which acts as the secretariat for the NCCCC), the Administrative Control Authority and the Prosecutor General's Office.

Some (national) interlocutors questioned the leading role assigned to the Ministry of State for Administrative Development, but, it was stated by the Cairo office, they were the only Ministry available at the time to countersign the project.

Some interlocutors also expressed the feeling that the project has been listening more to some views than to others and that opinions were being canvassed only from certain ministry contact points. An example given concerned the view reflected in project documentation that the criminal procedure was inadequate. Another legal professional described this conclusion as 'surprising'. Several interlocutors also strongly denied that any lack of internal coordination or overlapping of responsibilities was preventing proper enforcement of the existing anti-corruption laws. This latter point is important as assumptions of poor coordination play a central role in the project concept that appears to favour a single coordinating authority. Many countries have multiple competent authorities with mandates for anti-corruption enforcement which appear to function with reasonable effectiveness. Likewise, the presence of a single anti-corruption authority is no guarantee of effective policy, strategy or anti-corruption activity (as reference to Transparency International's Corruption Perceptions Index will show).

Most national interlocutors believed the failure of anti-corruption measures generally was linked to national culture and character rather than insufficiency of law. No less than three referred to the practice

of providing an informal ‘gift’ of money when submitting a driving licence application. It was said that the Egyptian people do not consider this to be corruption because corruption is only something that happens at the ‘grand’ level. Several said that awareness and education was key.

Two national experts expressed the view that the national strategy was something that could and should be left to the Egyptian government to develop.

Partnerships and Cooperation

With the exception of the views described above, the project team were said by interlocutors to be cooperating well with counterparts.

It is clear that there are other technical assistance projects operating in Egypt with very similar outputs and objectives. At the time of this evaluation it was not clear that this was being achieved and no evidence was presented of any attempts at coordination. This includes the parallel initiatives mentioned above currently being implemented by UNDP. These need to be acknowledged and attempts made to rationalise project delivery across all international interventions.

Effectiveness

At the time of the evaluation (August 2013) the implementation rate is reported as being 25.4%.

Activity on the National Strategy and Action Plan has so far not been effective at providing or achieving robust or sustainable results. Following a workshop in July 2013 the draft National Strategy Document and Action Plan (dated 18 October 2012) were substantially reworked with the new documents being provided to support the evaluation process in August 2013. The original project plan foresaw completion and launch of the strategy in Quarter 1 of Year 2 (i.e. by the end of 2012). The EU’s Results Oriented Monitoring Report stated that the strategy was a ‘good quality intermediate output’,¹⁹ however, the Evaluation Inception Report of July 2013 flagged specific points for review by the project team including the language and structure of that report and its lack of clarity in terms of scoping the nature of corruption and its definition. Some of these have since been amended in the new draft. The draft is still in need of proof-reading and does not define a clear strategic approach.

The revised Action Plan attached to the draft National Strategy has also been significantly restructured, but the document provided for this evaluation is only completed to the Outcome level. It was explained by the project coordinator that the detail is to be added by the national competent authorities. With the exception of a solid and sensible section on the ‘participation of society, raising awareness and education’, the outcome headings would also benefit from further review. For instance, under the section, ‘Improve Integrity in Law Enforcement’, Outcome 1 is ‘Introduce a new code of conduct for members of the police force, including traffic police.’ It is usual for members of the police service (including traffic police) to be subject to some form of discipline code and police orders and standards can already be said to be defined by the criminal code and the criminal procedure code which guide their work. It is not clear how a new code of conduct would change attitudes or practice without effective ways of monitoring and enforcing existing regulations. The wording of Outcome 2 of the Action Plan proposes ‘specialised anti-corruption training for members of the traffic police’. Such training should be extended to include the police as a whole. Traffic police are very often viewed as an area of specific concern, but the distinction in this

¹⁹ EU Results-Oriented Monitoring Report ref MR-I455580.01 dated 21.12.2012, page 3

proposal is artificial. The wording here also suggests an activity rather than an outcome. The same can be said of the wording of Outcome 3: 'Conduct a survey to assess the level of corruption in the Egyptian police forces'. If such a survey is indeed required, then it should predate the formulation of any national strategy or action plan in order to provide the evidence on which to base that strategy and action plan. Other law enforcement agencies (such as customs) are notable by their absence. This part of the action plan should propose practical measures for monitoring or enforcing compliance with ethical standards.

Priority II ('Improve the enforcement of anti-corruption legislation') is thin on detail and strategies for implementation.

'Improve Integrity in Law Enforcement' would sit more naturally under the 'Professionalism, Integrity and Transparency in Public Service' section alongside the similar priority on judicial and prosecutorial integrity

It was stated by UNODC that the combination National Strategy-Action Plan is really a national document the ownership of which lies with the Arab Republic of Egypt. Indeed some national interlocutors expressed the firm view that the Strategy should be left to the government to prepare. However, the National Anti-corruption Strategy is a major part of the project design (see Outcome 1 and Output 1.2).

Notwithstanding the shifts in and reorientation of government priorities, the level of development of this draft Strategy and Action Plan appears very provisional for this advanced stage of the project cycle. It does not present a clear plan for coordinated development or a coherent unified concept by which the Arab Republic of Egypt can proceed.

As can be seen from the different meeting attendance lists, participation of the Ministry of Interior in core activities has not been always forthcoming although the ministry has been invited to the events. Most interaction has been with the Ministries of State for Administrative Development and of Justice. One national expert stated that joint training between prosecutors and police was not welcome, but that it might be possible to bring them all together in a round table discussion afterwards. Someone else expressed the view that the police and customs are at the 'first front of corruption'. Renewed efforts are necessary to try to bring the Ministry of Interior to the table, but with the current security situation, this may not be possible.

Plans for a public awareness campaign (Project Outcome 4.2) were warmly welcomed by national interlocutors as an important opportunity. The related activities should have already been completed under the work plan, but the project coordinator cited delays in the procurement process requiring further tenders to be sought. The public attitudes survey anticipated under Outcome 4.1, however, was challenged by some national interlocutors who felt that more work should be done on developing national indicators or a national 'barometer' for measuring corruption. The UN survey on public attitudes conducted in 2009 may provide the baseline data required without the further need for further expense, effort or delay. The funds dedicated to the survey might be better utilised in extending the public awareness campaign.

Activities have been undertaken on witness protection. The term does not appear in the project document, but the activities can be justified as part of general support to the anti-corruption framework. Work done to date has addressed witness protection only at the rarefied, highest levels, but the vast majority of such cases will be very minor and can be dealt within the legislation aimed at

protecting the general populous from threats of violence and inference with justice. One national expert stated that discretionary measures have been provided in the past by police in the south of the country offering protection from blood feuds. This suggests that the option already exists, but that the will is lacking. An assessment of any legal or procedural impediments to extending such existing practice might help.

Witness protection should not be confused with the employment and civil law protection needed for whistleblowers, but it is unclear whether this distinction has been understood. It is not explored in the documents provided. 'Bill No3 on the Protection of Witnesses, Informants and Experts' will offer a protection option for witnesses in criminal proceedings, but whistleblowers do not necessarily always fall under these provisions. The current situation with the legislature also means that even this law on witness protection may not be adopted or implemented for some time.

The intention to develop the system of complaints is described in detail in the project document under Outcome 3 and Output 3.2. A short term expert has provided a report on this topic and a workshop was conducted in 2012. Since then this effort appears to have been placed on the back burner. It is noted that only one organisation (the Administrative Control Agency) was involved in that particular workshop (lending support to the criticism that opinions are sought from a limited range of stakeholders).

Among valid proposals contained in the recommendations in the report on complaints²⁰ is having common reporting formats and regular collection of statistics. Other recommendations, however, would benefit from further consideration. For example Recommendation 2 (the reasoning for which appears on p16 of that document) states that 'initial preliminary investigations' on reported corruption should be referred without investigation to Authorised Institutions. The justification provided is that untrained staff would harm the investigation. But this does not reflect the real world situation in which public departments and private companies very often review initial complaints as a matter of course. Whilst it may be important for major and complex cases to be handled by specialist departments, it is quite usual for preliminary enquiries to be conducted by trained first responders within the organisation itself. Not all cases of corruption involve huge sums of money, multiple jurisdictions and off-shore accounts. Any allegation of low level nepotism or a petty bribe will simply not demand or command the allocation of valuable central resources. Complaints of corruption may sometimes be malicious or made out of a misguided sense of personal grievance and will not justify immediate referral to a specialised central bureau. A robust complaints system must be able to accommodate all levels and degrees of complaint.

An option that does not appear in the report would be to support and encourage the development of a professional approach to handling complaints within government departments and the private sector (see, for instance, the Association of Certified Fraud Examiners²¹ or the International Compliance Association²²).

Comments were also received concerning training. Some praised the Basel Institute, but others said that the classes were not properly tailored to existing skills levels and did not provide the right material (described as 'too academic'). They preferred the workshop format of the StAR initiative claiming it provided more practical input.

²⁰ "Report on Assessment of the effectiveness of existing anti-corruption public complaints and reporting mechanisms and provision of recommendations to increase public awareness of these mechanisms " (14 October 2012) by Eric Lockyear

²¹ www.acfe.com

²² <http://www.int-comp.org/About%20ICA>

A review of the structure and approach of the Basel Institute shows they are in accordance with best practice. The lesson plans, pre- and post-testing and train the trainer components are well presented and form a logical progression. The student surveys seen as part of this evaluation indicate a high score in terms of satisfaction. In discussing this criticism another interlocutor pointed out that some students had been unhappy about being expected to participate actively and to provide input during class.

One person also said that cultural differences need to be considered in planning training courses. For instance, training days should only be held between 10:00 and 15:00. This does not appear to be a practical suggestion in terms of cost effectiveness of training delivery especially when international trainers are contracted. It was also said that using hotels as training venues was more popular than the alternative of government buildings because the facilities of national authorities were not as comfortable or well equipped.

The project coordinator was successful in attracting further funding from the government of Romania. The funding is aimed at financing a study trip to allow an exchange of practice with a country (Romania) that has recently had to introduce a new institutional and legislative framework for anti-corruption and money laundering. This contribution also financed the 'proof of concept' mission to Vienna for the UNODC goCASE software. Since the project is substantially underspent it is unclear why additional funding was required for this project or why these new activities have been added when they could have been subsumed into the existing work plan.

Impact

It is never easy to assess impact in an, as yet, incomplete project. This project in particular has faced extraordinary and manifold challenges to implementation. The Arab Republic of Egypt had a legal and administrative framework for combating corruption before the start of this project, but it was not functioning at a high level. As far as can be assessed, it is still not functioning well, but some national interlocutors were optimistic in their opinion that things had improved since the 2011 revolution. Some felt that the project had helped, but were unclear as to how.

With the project time-line already 66% over, and after significant support from the project team, the National Anti-Corruption Strategy and Action Plan remain still in a provisional draft. Indeed, the document and action plan were recently substantially revised indicating an altered strategic approach. The UNCAC Self-Assessment process has also been assisted, but the self-assessment has been postponed at government request so it is not possible at this time to say whether the provided support was successful.

Both the National Strategy (and Action Plan) and the UNCAC Self-Assessment are national responsibilities and require sufficient and genuine political will to be achieved. Were there the will on behalf of the national government to progress these documents, then both of these outcomes would have been easily achieved without the need of support from any outside agency.

Training (including the training of trainers) in financial investigation is well advanced and has the potential to establish lasting national capacity in this area. The pre- and post-testing conducted by the Basel Institute indicate that specialist skills have indeed been developed, but one interlocutor stated that 70% of personnel in one specialist unit (that had received training) had already been replaced following changes in government. This is one of the challenges for this project and an important justification for developing national training capacity.

An example of real impact was provided by one interlocutor who stated the project had helped in understanding what was required in submitting requests for mutual legal assistance regarding asset seizure and recovery. Previous requests were being constantly rejected because they did not comply with the necessary norms.

Credit should also be given for assistance provided to the government in developing the draft law on witness protection.

Awareness activities foreseen in the project have yet to materialise, but are in progress. They have the potential for establishing a definite and significant long term impact, but the impact will not be measurable during the life-time of this project.

The most significant project impact so far has been in keeping the various components of anti-corruption at the forefront of government consciousness during a period of momentous change and upheaval.

Sustainability

The sustainability of this project is highly dependent on the prevailing political and security situation in the Arab Republic of Egypt. Skills and knowledge provided through the direct training provided are sustainable on the individual level and may be sustained on the institutional level once the Basel Institute's training of trainers programme has been completed. Planned public awareness activities will also have a component of sustainability once completed.

National statements have highlighted corruption as a priority and interlocutors stated that the draft constitution (now suspended) did contain provisions to reinforce the anti-corruption message. However, and notwithstanding the sincere sentiments of certain individuals, the system as a whole has not evinced anything more than a cosmetic response to societal and international appeals for action.

III. CONCLUSIONS

This project was slow to start and has still to develop full momentum. This does not appear due to any lack of effort by the project team (although perhaps the lengthy recruitment procedures for international staff did play their part), but because of the unstable national political context.

Everyone concerned, including national experts, were realistic in their understanding of the obstacles to achieving change. The persons interviewed for this evaluation were a self-selecting sample of interested, engaged and enthusiastic experts, but their obvious commitment does not appear to be replicated across the full range of stakeholders. Less than total commitment at the highest level will affect the pace of change.

Conceptually the project has been welcomed by all interlocutors and the project team has been consistently praised for being helpful, flexible and responsive. This is despite at least 3 interlocutors highlighting a perceived lack of interaction with the full span of government departments and counterparts with some national actors being listened to more than others. They suggested that information received and acted on by the project did not reflect the full range of national opinion.

Indeed, the Ministry of Interior, police and customs have had limited input to date, despite having a key role to play in delivering the objective. However, the absence of the Ministry of Interior may also be attributed to the reluctance of that Ministry to engage as well as to the reluctance of other government departments to involve them (one interlocutor, for instance, stated that joint training with police officers would be unacceptable to his department). The documentation suggests that the project team has taken and continues to take steps to include the Ministry of Interior. Since aspects of the latest iteration of the draft National Strategy are targeted at the police including them in any such discussion would be highly appropriate.²³

Opportunities for civil society to express its views and to participate in the development of the national anti-corruption strategy (despite inclusive statements in the project document) have so far also been limited, but it is also clear that some (though not all) actors would be reluctant to allow such involvement.

The relationship with the Ministry of State for Administrative Development does not appear to have been productive. Interlocutors stated that when the project was being negotiated in the uncertainty of the aftermath of the 2011 revolution, the Ministry of State for Administrative Development was the only available national counterpart. Project activities have been undertaken with the assistance of the Ministry of Justice, but this Ministry has now partnered with UNDP in an anti-corruption project involving the NCCCC.

²³ For instance, the attendance list of the 'Summary of discussion during expert meeting on a National Strategy to combat corruption including money laundering and to recover stolen assets in Egypt (5- 7 December 2011)' shows no one from the Ministry of Interior or police (except possibly one person from Interpol)

In respect of project design, a number of the key elements and the timeline for implementation appear overly optimistic (and would have appeared so even in 2011). Some of the outcomes, outputs and activities could and should have been framed in more specific terms.

A better researched business case taking into consideration the existing legal and institutional framework would have helped prevent this. It would also have led to the identification of similar initiatives by other international organisations and to better coordination. On the other hand, focusing on the 'coordination' of different national committees and their meetings has tended to feed existing inertia and bureaucracy without leading to substantive results. The emphasis on assisting the government to develop the National Anti-Corruption Strategy and anticipating the postponed UNCAC Self-Assessment has meant that practical measures (such as under 1.3.2) have been displaced.

By the same token the emphasis on drafting new legal provisions within the project strategy when expert opinion is that the legal provisions already substantially exist would be better replaced by a focus on practical implementation.

Some interlocutors felt that the training provided was not at the appropriate level or covering their needs. Before developing a training programme it is a useful exercise to conduct a training needs analysis and the project team has responded that such consultation was in fact undertaken - pointing to the 'scoping mission' conducted by the Basel Institute of Governance between 19-22 November 2012. The resulting curriculum is well structured and comprehensive.

There does not, however, appear to have been a proper needs assessment or business case conducted in respect of asset recovery and case management software. At least three interlocutors queried whether such software was needed (although it is true to say that another interlocutor felt it was).²⁴ Such a needs assessment should consider national procedures and capacities and, if the need for software is found, an appraisal of different software solutions should ensue with an objective and independent procurement process.

Although they have yet to be conducted, the activities on awareness and ethical education have the potential for making an important impact in the long term and should now be given urgent priority.

²⁴ The difference in opinion reinforces the need for such an assessment.

IV. RECOMMENDATIONS

These recommendations are aimed at enabling the project team to redirect their efforts in assisting the Arab Republic of Egypt to make maximum impact against corruption and to support the effectiveness of those individuals dedicated to meeting that challenge.

The project team has dedicated considerable effort to supporting administrative measures that have made little impact on establishing an effective mechanism against corruption or money laundering. The project is two-thirds over and efforts in this direction have to date produced no, or no significant, outcome or effect. The suspended draft constitution was ready to establish a new national coordinating body while the NCCCC is seen by more than one of those interviewed to have been ineffective. Given the current political situation in the Arab Republic of Egypt, there is no evidence to suggest that such a body will be any more effective or productive in the future.

Likewise the UNCAC self-assessment process (for which three seminars have already been held on how to complete the checklist) and the National Strategy and Action Plan have not made adequate progress for this point in the project. These are government obligations and two national professional interlocutors expressed the reasonable view that it is for the government of the Arab Republic of Egypt to define or redefine its strategic intentions and priorities. Advice on what these documents should contain has already been provided in good measure.

For this reason, it is recommended that the project team reduce activities related to coordinating further the various committees mentioned in 1.1, 2.1 and 3.1 of the project plan, to reduce support to the UNCAC Self Assessment process (*under this project*) and to reduce its commitments to further 'coordination' of the National Anti-Corruption Strategy and Action Plan. Expert advice can always be offered as requested and required.

For the remainder of the project, the team should concentrate on providing technical assistance in those areas of concern already highlighted by national counterparts and international assessment. These include, but are not limited to, public awareness and education, the law protecting whistleblowers from victimisation, developing specialist skills in combating corruption, money laundering and asset recovery and integrity testing. Of these, the activities in public awareness and education are likely to provide the most impact in the time left and within the operational context.

The project team should also arrange for an objective needs assessment regarding computerisation and software solutions. If and where such solutions are deemed appropriate an open procurement procedure should be conducted against the specifications required.

Notwithstanding concerns over the effectiveness of the Steering Committee, having established such a Committee with national counterparts, the project team is obliged and should fulfil the committee's legitimate expectations by keeping its members regularly informed and by using the committee as a sounding board for proposed action and for obtaining feedback. If there are concerns over the constitution of this steering committee, then the project team needs to address them with the necessary counterparts. The project team should also continue with its efforts to involve more closely the Ministry of Interior, police and customs and, wherever possible, to involve civil society directly in discussion and debate with government authorities - especially on substantive matters. This will also provide civil society

with a more rounded appreciation of the efforts of government and of the size and scope of the challenges involved.

The project team should continue to develop and expand national training capacities. The project team has benefited from the approach adopted by the Basel Institute of Governance, but should also be building that good practice into all similar workshops and training activities.

The project team is also encouraged to continue to attempt to bring different types of professionals together as appropriate for joint training. If separate training is the only possible option, a round table can be arranged to bring all relevant professionals together to debrief the issues raised from different perspectives. To counter the perception that the training provided has not been the result of proper consultation the project team should ensure details of that consultation and the content of training courses are fully communicated to the steering committee.

Notwithstanding legacy and donor preferences for promises of beneficiary-based outcomes, those responsible for developing project documentation should define the project as far as possible in terms of deliverables that are within the scope, influence and ability of the project team to accomplish. The acronym SMART²⁵ has stood the test of time and should be applied.

Last but not least, in order to implement those activities that are not yet completed UNODC should extend the project for 12 months.

²⁵ Specific, Measurable, Achievable, Relevant and Time limited.

V. LESSONS LEARNED

At this stage of the project, lessons are yet to be learnt. However the project team has proved itself adaptable to coping with shifting national circumstances. It will require time for any of the interventions so far undertaken to establish themselves sufficiently for lessons to be fully identified. At this point in time it is possible to highlight the following:

The Basel Institute of Governance's structured approach to its training programme contains all the hallmarks of best practice. The approach includes:

- Training needs assessment
- Training Curriculum prepared and programmed in detail and advance
- Pre- and Post-training Testing
- Satisfaction Surveys

However this is a self-contained outsourced programme distinct from those activities directly implemented by the project team.

The project appears to have been designed without sufficient assessment of the national context, existing legislation or the administrative structures already in place. This led to the formulation of outputs and activities that diverted attention away from the implementation of actual anti-corruption measures. The preparation of a business case and needs assessment is one way to prevent this from occurring - as is a willingness to customise project outputs to identified needs rather than selecting options from a menu of standard options.

The comfortable use of simple comparisons by which to measure project delivery is also indicative of a less than rigorous project approach. The use of terms such as 'enhanced', 'raised', 'supported', 'strengthened' or 'improved' suggests either that there is doubt over the ability to deliver on that particular outcome or output, or that the project design and its implementation have not been sufficiently considered.

ANNEX I. TERMS OF REFERENCE OF THE EVALUATION

Terms of Reference

- Title:** International Consultant (Evaluator)
Contract: Individual Contract (IC)
Duration: 15 working days within the span of two months, starting from the date of signature of the contract expected to be during June 2013.
Duty Station: 5 days in Cairo – Egypt and 10 days home based

1. BACKGROUND INFORMATION

- (a) Project overview and historical context in which the project is implemented

Corruption is still reported to be widespread in Egypt and is identified as the greatest obstacle to sustainable inclusive economic development. Although corruption was the main driver for the 2011 uprising, progress to overcome the problem was not really made and corruption perception did not improve in the last years.

The political instability since after the revolution has undermined efforts towards an efficient anti-corruption legal and institutional reform. The lack of leadership has encouraged the fragmentation of the competencies, generating confusion and destructive competition on assuming the ownership for the anticorruption policy. The enforcement of the existing legal framework criminalizing corruption was also hindered by lack of a clear strategy to address the phenomenon and the broadly defined and overlapping mandates of the anti-corruption agencies (the Administrative Control Authority, the Public Prosecution, the Administrative Prosecution, the Central Audit Authority, the Department for Illegal Gains and the Public Fund Crimes' Investigation Police).

With a view to support the Egyptian Government to address corruption and the legal and institutional gaps, the EGYX49 - "Supporting Measures to Combat Corruption and Money Laundering, and to Foster Asset Recovery, in Egypt" project aims to rationalize the legal and the institutional set-up for corruption prevention and countering in a systematic and effective manner under the umbrella of a national anticorruption strategy and to increase the state capacity to detect, investigate and prosecute corruption cases. It also includes a specific chapter dealing with the recovery of assets of former leaders and other high-ranking officials accused of, or found to have engaged in widespread corruption over long periods of time. Priority is also given to raising public awareness on the risks and consequences of corruption, creating tools for corruption measurements and reporting and empowering civil society in the prevention and fighting corruption.

(b) Justification of the project and main experiences and challenges during implementation

The project responds to the Egyptian Government need to establish effective mechanisms to combat corruption and money laundering as well as to establish the necessary framework for implementing the United Nations Convention against Corruption.

The project deliverables were officially agreed with the national stakeholders on August 11, 2011, when the project document was signed by UNODC and the main national counterpart, Ministry of State for Administrative Development. The project start was marked on September 23, 2011 by a reunion hosted by the Ministry of State for Administrative Development with representation from Egyptian anti-corruption agencies, other governmental institutions, civil society and private sector actors.

However, the political instability, lack of clear authority and continuous changes in the composition of the top tier in the beneficiary institutions that characterized the aftermath of the 2011 uprising and until mid 2012 have generated large reluctance of the key anticorruption agencies to engage in the project activities, especially the ones requiring political decision, such as the adoption of the national anticorruption strategy, legal or institutional reform.

On June 30, 2012, as a result of the first democratic elections in Egypt's modern history, President Mohammed Morsi was sworn into the office. Fight against corruption was proclaimed as one of the top priorities on the political agenda. However, despite such strong political statements, real signs to put in place an efficient system to curb corruption have failed to appear in 2012. This was mainly determined by the fact that priority was given to the process of adoption the new Constitution, before any other subsequent legislation including for shaping the framework for the anti-corruption policy.

This situation has again conflicted with the work plan of the project and, consequently, the activities related to the finalization of the national anticorruption strategy and legislation reform couldn't be pursued by the end of 2012. Nevertheless, with the adoption of the new Constitution by national referendum in December 2012, necessary preconditions for launching an anticorruption policy were put in place and, as a result, for the implementation of the project.

It will still have to be seen to which extent the initiatives to launch the national anticorruption strategy and the institutional and legal reform as per the new Constitution will be materialized in an adequate time frame given the wide spectrum of existing anticorruption agencies and concurrent mandates on anti-corruption that have to be revised.

Project documents and revisions of the original project document

The project was designed to provide assistance to the Egyptian Government to establish effective mechanisms to combat corruption and money laundering.

The original project document, signed on 20 July 2011, was revised on 19 December 2012 through a contract addendum providing for extra-funds to the Action, amounting EUR 440,000. This amount is meant to support the efforts of the Egyptian Government to foster asset recovery through a set of measures including via the establishment of automated means for asset recovery and corruption case management as well as a series of mission for Egyptian officials dealing with asset recovery in foreign states where stolen assets are likely to be hidden.

(c) UNODC strategy context, including project's main objectives and outcomes

The project is fully in line with the UNODC Regional Programme on Drug Control, Crime Prevention and Criminal Justice Reform in the Arab States 2011-2015, Action against Corruption, Economic Fraud & Identity-Related Crime.

As such, the project aims to establish an effective mechanism to combat corruption and money laundering in Egypt, to foster asset recovery procedures, as well as a solid framework for the implementation of the United Nations Convention against Corruption, by accomplishing a series of four main outcomes:

- Outcome 1: National anti-corruption strategy developed and implemented including anti-money laundering and asset recovery
- Outcome 2: National legal framework on anti-corruption, anti-money laundering and asset recovery established
- Outcome 3: Institutional capacity to combat corruption and money laundering and to recover stolen assets enhanced
- Outcome 4: Public awareness on the negative effects of corruption and money laundering raised.

(d) Disbursement history

Overall Budget (20 July 2011-19 July 2014)	Total Approved Budget (20 July 2011 – 28 February 2013)	Expenditure (20 July 2011 – 28 February 2013)	Expenditure in % (20 July 2011 – 28 February 2013)
USD 4,219,067 ²⁶	USD 761,240	USD 505,490	13.97%

2. JOB SUMMARY:

a) Purpose of the Evaluation

²⁶ As revised on 19 December 2013

At the request of the donor and in line with the UNODC basic principles of project management, the project document provides for Project Mid-term and Final Evaluation. The Project Mid-term Evaluation is expected to contribute, besides measuring the project interim results against the work plan, to identification of the implementation shortcoming as well as means to address these shortcomings, including, if necessary, readjusting of activities and time scale. The findings of the Project Mid-term Evaluation are expected to suggest new strategic directions and decide whether to extend the duration of the project. The Final Independent Project Evaluation will be conducted close to the end of the project. This final evaluation will, amongst others, analyze the impact, relevance, efficiency, effectiveness and sustainability of the project's activities and derive recommendations and lessons learnt from measuring the achievements of the project for the planning of future projects. The Project Evaluation seeks to provide accountability to donors by determining whether project objectives were met and resources were wisely utilized, identify areas of improvement in the project and learn lessons for a possible extension of project.

b) Scope of the Evaluation

The Project Mid-term Evaluation will cover the implementation of EGYX49 project against the work plan; specifically it will focus on the following:

Project relevance, concept and design

The evaluation is intended to assess the project concept and design. The evaluator will review the problems addressed by the project and the project strategy, encompassing an assessment of the appropriateness of the objectives, planned outputs, activities and inputs as compared to any cost effective alternatives. Relevant executing modalities and management arrangements should also be judged. The evaluator will assess the achievement indicators and review project work plans and budgets. Finally, a brief review of the project documents should also be conducted, analyzing their clarity, logic and coherence since these are indicative of a suitable design.

Implementation

The evaluator will assess the implementation of the project in terms of the quality and timeliness of inputs, as well as the efficiency and effectiveness with which activities have been carried out. Management effectiveness should also be evaluated, including an analysis of the quality and timeliness of monitoring and backstopping by all relevant project parties. Cooperation and coordination among involved stakeholders will be also addressed.

Project outputs, outcomes and impact

The evaluator will assess the outputs, outcomes and impact achieved by the project (or expected to be achieved by the end of project implementation), as well as the likely sustainability of project results. This should encompass an assessment of the achievement of the immediate objectives. The evaluator will examine if the project has had significant unexpected effects, whether of beneficial or detrimental character.

Sustainability

The aim of any project is to deliver lasting benefits. This part of the report should deal with whether or not there is evidence that benefits will continue beyond the provision of project assistance and funding, as well as whether the project has created the institutional and human capacity to sustain these benefits. In particular, the evaluation should assess the sustainability of the reintegration approach developed under the project.

Lessons learned

The evaluator will record lessons learned from the project, particularly those which are valid beyond the project itself.

Recommendations

The evaluator will make proposals for the second phase of the project aiming mainly:

- ✓ To enhance what was implemented during the first phase of the project and maintain its sustainability defining what should be the roles and responsibilities of the project beneficiaries and the executing agency.
- ✓ To suggest necessary actions in order to improve or rectify any undesired outcomes and the project time frame.

The time period to be covered by the evaluation

The evaluation will assess the implementation of the project from its inception on 20 July 2011, when the financial agreement with the donor was signed, until 28 February 2013.

The geographical coverage of the evaluation

EGYX49 is a national project, having as main beneficiaries the Egyptian Government, located in Cairo, Egypt.

Evaluation criteria and key evaluation questions

The evaluation will be conducted based on the following criteria: relevance, efficiency, effectiveness, impact, sustainability and partnerships and cooperation and will respond to the following questions:

Relevance

How relevant are the project objective and activities to the Government of Egypt present needs to address legal and institutional reform to fight corruption and to limit its consequences?

Does the current project design provide a comprehensive approach to effectively fighting corruption, in line with the international standards for capacity and institutional building in this respect?

Do the project activities reach to all relevant stakeholders?

Is the project budget realistic to the proposed activities?

Is the project calendar realistic? Do you think that the project activities could be achieved within the project current duration?

Does the project create the possibility for the project results to continue after the project end?

Efficiency

Did the project implementation follow the project action plan, the coherent sequence of activities and the continuous changing needs of beneficiaries;

Does the technical assistance meet the necessary quality standards?

What is the overall impression regarding the UNODC and external experts involved in the project activities?

Do the training venues and other technical assistance arrangements meet satisfactory standards?

Are the project delays justifiable?

Effectiveness

What are the project main achievements and deliverables? What is the degree of satisfaction with project deliverables?

Did the technical expertise manage to ensure the appropriate transfer of know-how?

Did the project appropriately address inter-agency collaboration and involvement of all relevant stakeholders?

Impact

Has the project contributed to the Government of Egypt efforts to reshape the legal and institutional framework on fighting corruption?

Has the project contributed to enhancing the capacity of judiciary, prosecution and law enforcement to deal with corruption, money laundering, including in international cooperation and asset recovery proceedings?

Is the project likely to contribute, on long term, to changing the mind set of the Egyptian population towards a culture with zero tolerance to corruption?

Sustainability

What type of project measures is likely to be sustainable after the project end?

Did technical assistance and capacity building foresee for sustainability, such as ToT, training materials that could be used after the project end? Are there strategies in place how to use these deliverables after the project end?

Partnerships and cooperation

Has UNODC for the implementation of this project collaborated with other donors and technical assistance providers? Which ones?

What was the framework of such collaboration?

Did such collaboration manage to de-conflict between donors' agenda and make best use of resources?

Lessons learned

What are in your opinion the difficulties in the project implementation? What types of actions need to be taken to avoid such issues in the future? What is the lesson learned from this?

Is there any success story related to the project implementation? What type of actions is necessary to multiply such successes?

c) Evaluation Methodology

The evaluation will be based on the review of project related documents as well as conducting interviews / discussions with key persons involved in the project implementation and beneficiaries. These include: representatives from the national counterparts (Ministry of State for Administrative Development, Ministry of Justice, Ministry of Interior, the main anti-corruption agencies), other stakeholders (civil society organizations etc.), donors, relevant UNODC staff and consultants. The evaluation methodology and the evaluation questions have to be further refined in the inception report by the evaluator.

For the purpose of evaluation, both primary (interviews, questionnaires etc.) and secondary data (project reports, Government reports, previous evaluations conducted etc.) are to be used.

Although the evaluator should take the views expressed into account, he/she should use his/her independent judgment in preparing the final report.

d) Evaluation Team Composition

The evaluation will be carried out by an external consultant having experience in project management/administration as well as extensive knowledge of evaluation systems (procedures and methodologies), partnership building, institution and capacity building and results-based management.

The evaluator should have sufficient knowledge of anti-corruption policies, particularly in the context of the political, economic and social problems of the region.

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

The evaluator will not act as representative of any party, but should use his/her independent judgment and should not have been directly involved in the design, appraisal or implementation of the project.

The evaluator will work in close cooperation and report to the Project Coordinator in UNODC ROMENA, who will provide all necessary substantive and administrative support for the evaluation. The evaluator will consult with project staff, national counterparts, implementing partners, and will visit appropriate project beneficiaries. The evaluator is not authorized to make any commitments on behalf of UNODC or any other parties to the project.

e) Planning and Implementation Arrangements

Roles and responsibilities of the evaluation stakeholders

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 evaluator throughout the entire evaluation process. IEU comments on and approves the selection of consultant and the evaluation methodology and provides methodological support throughout the evaluation; 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 Coordinator

Project Coordinator is responsible for the provision of desk review materials to the evaluator, reviewing the evaluation methodology, liaising with the Core Learning Partners, as well as reviewing the draft report and developing an implementation plan for the evaluation recommendations.

Project Coordinator will be in charge of arranging the meetings with stakeholders.

Core Learning Partners

Members of the Core Learning Partnership are selected by the project managers in consultation with IEU. Members of the CLP are selected from the key stakeholder groups, including UNODC management, mentors, beneficiaries, partner organizations and donor Member States. The CLPs are 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.

Evaluator

- draft the inception report, including a finalized evaluation methodology incorporating relevant comments;
- carry out the desk review;
- carry out the field mission;
- implement quantitative tools and analyze data;
- triangulate data and test rival explanations
- ensure that all aspects of the terms of reference are fulfilled;
- draft an evaluation report in line with UNODC evaluation policy;
- finalize the evaluation report on the basis of comments received;
- include a management response in the final report.

Logistical support responsibilities

UNODC Project team will make the following arrangements:

- manage the time table of meetings with the relevant stakeholders;
- provide interpretation for meetings with local stakeholders, when required;
- put at the disposal of the evaluator all necessary documentation for conducting the evaluation.

Timeframe for the evaluation process

*Time frame for evaluation**

15 working days within the span of two months, starting from the date of signature of the contract

Time frame for the fieldmission

- 5 working days in Cairo

* The proposed time frame is an estimate; due to possible unforeseen delays in the consultation process, including possible additional rounds of revising the draft or final evaluation report, the time frame may be extended.

3. REMUNERATION, RESPONSIBILITIES & DELIVERABLES

The consultant will be issued consultancy contract and will be paid in accordance with UNODC rules and regulations in two installments, upon delivery of the Inception Report and the third payment for submitting the Final Evaluation Report.

Amount	Deliverable
Upon submission of the Inception Report	30%
Upon submission of final draft to be approved by UNODC	70%

Mandatory deliverables

- Inception Report, containing a refined work plan, methodology and evaluation tools
- Final Evaluation Report, including the annex with management response

Duties	Location and duration	Deliverables
Desk study	Home based 2 working days	Inception report
Evaluation field mission: briefing, interviews, desk review	Cairo 5 working days	
Drafting of the evaluation report; submission to stakeholders for comments; and finalization of report	Home based 8 working days	Draft report Final Report
Total	15 working days	

4. SUPERVISION

The Consultant will work under the overall guidance and supervision of the Anti-corruption Project Coordinator based at UNODC Regional Office in Cairo. Although the evaluator should take the views expressed into account, the evaluator should use his/her independent judgment in preparing the final report.

5. COMPETENCIES:

- Practical experience in technical assistance project design and implementation in a multilateral context is highly desirable.
- Extensive knowledge of evaluation systems (procedures and methodologies).
- Knowledge and working experience in the field of corruption. Knowledge and working experience in the field criminal justice reform is an asset.
- Up-to-date knowledge and practical experience of UN programmes, policies, guidelines and procedures is an asset.
- Excellent writing, editing, and oral communication skills in English. Knowledge of Arabic is considered an asset.
- Computer literacy.

6. QUALIFICATIONS:

- Advanced University Degree in law, social and political sciences, criminal justice or other relevant academic background in the field of criminal justice in general and anti-corruption in particular.
- At least 5 years of relevant professional working experience in project management, evaluation and planning.

7. ABSENCE OF CONFLICT OF INTEREST

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

8. ETHICS

The evaluators shall respect the UNEG Ethical Guidelines.

(Only Short Listed Candidates will be contacted).

ANNEX II. EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES

ENGAGEMENT SURVEY

“EGYX49: Supporting Measures to Combat Corruption and Money Laundering, and to Foster Asset Recovery, in Egypt”

Project Engagement Survey

Objective:

An effective mechanism established to combat corruption and money laundering in Egypt, to foster asset recovery procedures, as well as a solid framework for the implementation of the United Nations Convention against Corruption.

CONSOLIDATED REPLIES

Questions:

Where a numbered scale is provided, please circle the number that best represents your views

1. How familiar were you with this objective before this survey?

Not at all

Very

	0	1	2	3	4	5	6	7	8	9	10
Score								**	**		***
% ²⁷								29	29		43

2. How well do you understand the aim of the project?

Not at all

Very well

	0	1	2	3	4	5	6	7	8	9	10
--	---	---	---	---	---	---	---	---	---	---	----

²⁷ Rounded up or down to nearest integer. This means that sometimes scores will total more than 100%.

Score									**	***	**
%									29	43	29

3. How will achieving this objective help the Arab Republic of Egypt in reducing corruption?

Not at all

Significantly

	0	1	2	3	4	5	6	7	8	9	10
Score						*			**	****	
%						14			29	57	

4. Please rank the following interventions in terms of their importance in overcoming corruption in the Arab Republic of Egypt. (with 1 being the most important and 6 being the least important)

6	6	1	5	1	6	5	Recovering money and assets acquired through corruption
3	4	2	1	5	2	2	A national legal framework dealing with corruption
5	1	3	2	4	4	6	Higher public awareness on the negative effects of corruption
2	5	4	6	3	5	3	A strategy for dealing with money laundering
1	3	5	3	6	1	1	A National Anti-corruption strategy
4	2	6	4	2	3	4	Improved skills and ability to combat corruption and money laundering

5. How long do you think it will take to establish an effective mechanism against corruption, money laundering and asset recovery in the Arab Republic of Egypt?

3 years * 5 years ** 7 years **** 10+ years

6. Are there any areas in the fight against corruption that you think are not covered by this list?

Institutional framework since project baseline is democratic governance.

National anti-corruption work plan

Financial Market infrastructure integrity and compliance

Transparency Framework

Online PEP Database

FIU compliance and auditing

International cooperation, and successful international experiences in the field of mutual legal assistance.

Providing successful international experiences in the field of asset recovery.

Providing comparative analysis of national strategies aimed at fighting corruption,

Reform of the wages in the public sector

Economic reform

Social Reform

7. Please list any other projects or technical assistance programmes related to anti-corruption, money laundering or asset recovery in which you or your colleagues are involved.

UNDP project strengthening transparency & integrity in the civil service 2013-14

National committee for stolen asset recovery

Project drafting freedom of information act

PEP definition

Evaluating FIU AML/CFT compliance

GoCase/GoAML

Legal reform with a view to align anti-corruption legislation to international standards

Strengthening the role of civil society to fight corruption

Disseminating good governance policies on management of public services.

Community awareness on the danger of corruption

Special courses to train the staff in ministries on developing awareness campaigns

Transfer of expertise and best practices of the developed countries in the area of anti-corruption

Best practices on anti-corruption IT solutions

Training in the use of the latest technologies for undercover investigations, technical support and communications

Supply of advanced computer programs designed to manage databases, analysis and suspicious transactions

8. How supportive do you think your department or organisation is of Project EGYX49?

Not at all

100%

	0	1	2	3	4	5	6	7	8	9	10
Score		*						*	**		***
%		14						14	29		43

9. Please rate any project meetings or events in which you were involved in terms of:

- Overall preparation

Poor

Excellent

	0	1	2	3	4	5	6	7	8	9	10
Score				*				**		****	
%				14				29		57	

- Advance awareness of the aim of the meeting or event

Poor

Excellent

	0	1	2	3	4	5	6	7	8	9	10
Score				*			**	*		***	
%				14			29	14		43	

- How well the meeting or event achieved its aim

Not at all

100%

	0	1	2	3	4	5	6	7	8	9	10
Score				*	*		*	*	**	*	
%				14	14		14	14	29	14	

- The way in which the meeting or event was followed up

Not at all

Very well

	0	1	2	3	4	5	6	7	8	9	10
Score		*	*	*		*		**		*	
%		14	14	14		14		29		14	

- The facilities offered in the meeting room

Poor

First class

	0	1	2	3	4	5	6	7	8	9	10
Score								**	**	**	*
%								29	29	29	14

10. Please rate any documentation or information provided in terms of:

- Readability

Poor

Very readable

	0	1	2	3	4	5	6	7	8	9	10
Score							*	**	**	**	
%							14	29	29	29	

- Quality of information provided

Poor

Very informative

	0	1	2	3	4	5	6	7	8	9	10
Score					*			***	*	**	
%					14			43	14	29	

ii. Please rate experts employed by the project in terms of:

- Knowledge

Poor

Top expert

	0	1	2	3	4	5	6	7	8	9	10
Score					*			*	**	***	
%					14			14	29	43	

- The standard of presentation

Poor

Perfect

	0	1	2	3	4	5	6	7	8	9	10
Score				*				*	***	**	
%				14				14	43	29	

- Communication and comprehension

Poor

Exceptional

	0	1	2	3	4	5	6	7	8	9	10
Score				*				**	**	**	
%				14				29	29	29	

- Willingness to discuss different ideas and views

Totally unwilling

Totally open

	0	1	2	3	4	5	6	7	8	9	10
Score				*	*				*	**	**
%				14	14				14	29	29

12. In your view how active has the project been in running meetings, events or training in the past two years?

Very inactive

Extremely active

	0	1	2	3	4	5	6	7	8	9	10
Score				***				*	**	*	
%				43				14	29	14	

13. To what extent has your involvement with the project increased your skills and knowledge about corruption, money laundering or asset recovery?

Not at all

100%

	0	1	2	3	4	5	6	7	8	9	10
Score				*	*	*		***			*
%				14	14	14		43			14

14. How far would you say other participants at meetings or events were:

- Representative of Egyptian measures in anti-corruption

Not at all

Completely

	0	1	2	3	4	5	6	7	8	9	10
Score							*		**	****	
%							14		29	57	

- Knowledgeable about anti-corruption

None

Top expert

	0	1	2	3	4	5	6	7	8	9	10
Score							***		*	***	
%							43		14	43	

15. Please rate the level of opportunity you have had to contribute your views to the project

No opportunity

Every opportunity

	0	1	2	3	4	5	6	7	8	9	10
Score			*		**			**		**	
%			14		29			29		29	

16. In your view, how has the project so far supported national efforts in reducing corruption?

Not at all

Significantly

	0	1	2	3	4	5	6	7	8	9	10
Score			**			*	***			*	
%			29			14	43			14	

17. How well has the project raised awareness of corruption and money laundering with the Egyptian public?

Not at all

Very effectively

	0	1	2	3	4	5	6	7	8	9	10
Score		*	***	*	*	*					
%		14	43	14	14	14					

18. How would the Arab Republic of Egypt support measures against corruption without the support of the EU, UNODC or other international donors?

Not at all

With 100% commitment

	0	1	2	3	4	5	6	7	8	9	10
Score		*				*			**	*	*
%		14				14			29	14	14

(One respondent left this question unmarked)

END OF SURVEY

ANALYSIS

Thirty-nine (39) requests for completion of the survey were sent out by email on 16 July 2013 with a reminder sent on 29 July. The survey was sent in both English and Arabic (translated with the kind assistance of UNODC ROMENA). The deadline for response was given as 1st August.

Six (6) of the email addresses were returned as undeliverable. Alternative email addresses for five (5) of these were sought. Of these five (5), one was returned as undeliverable.

In order to include additional Civil Society Organisations in the sample, a further four (4) surveys were emailed on 25th July with a return deadline of 9th August. In all forty-one (41) emails were sent without notification of delivery failure.

As of 20th August 2013, only seven (7) replies had been received which corresponds to a response rate of 17 %. Conclusions drawn from such a low response rate offer little value or significance. However, the scores and comments have in any case been reproduced above. Where a score was marked on the survey between values, the higher value was used.

Given the current disruption in the Arab Republic of Egypt it is quite understandable that counterparts may have been preoccupied with other priorities. The efforts of those who were able to respond in so helpful a manner despite the security situation should be acknowledged.

INTERVIEW PLAN

This interview plan is to be changed and adapted depending on the interlocutor and the circumstances of the interview,

Explain and establish function of the evaluation

Inquire about interlocutor's function and relationship with the project

Guideline questions (to be varied according to direction and content of responses)

EVALUATION QUESTIONS

The evaluation will address the main question: How is this project achieving its stated objective of establishing 'an effective mechanism ... to combat corruption and money laundering in Egypt, to foster asset recovery procedures, as well as a solid framework for the implementation of the United Nations Convention against Corruption.'

In assessing project performance to date, the following questions will be considered:

RELEVANCE

- How would you describe the needs of the Arab Republic of Egypt in terms of addressing corruption, money laundering and asset recovery?
- How does the project objective satisfy these needs?
- How relevant are the project activities to achieving this objective?
- How does the current project design support the objective?
- How do project activities reach or engage all relevant stakeholders?
- How does project design support achievement of the objective?
- How well are project outcomes and activities defined?

EFFICIENCY

- How well is the project work plan (work breakdown structure) defined?
- How is the work plan used by project staff?
- How has external expertise been identified and used to support activities?
- How has project implementation adapted to changes in the operational environment?
- How has the operational environment impacted on project delivery?

- How have quality standards in technical assistance and other project activities been met?
- How is progress being measured?
- How have project staff complied with reporting requirements and reporting standards?
- How realistic is the project budget with regard to the proposed activities?
- How realistic is the timescale for project activities?

EFFECTIVENESS

- What has the project achieved to date?
- How do you rate the quality of project delivery so far?
- How does the project design address shortcomings in the current legal and institutional situation regarding corruption in the Arab Republic of Egypt?
- In what way does the project provide a holistic response to corruption?
- How has the project supported the transfer of know-how to national counterparts?
- How does the project ensure that the most suitable and relevant people attend workshops and training?

IMPACT

- How is the project addressing obstacles to UNCAC implementation?
- How would you characterise cooperation and collaboration between national agencies dealing with corruption?
- How has the project assisted in building inter-agency cooperation and collaboration?
- How has the project contributed to national efforts in making the legal and institutional framework on fighting corruption more effective?
- How does the project address transparency in matters related to corruption?
- How will the project contribute in the long term to fostering zero tolerance among the Egyptian population?
- How does the project support the recovery of assets from corrupt officials?

SUSTAINABILITY

- How does project design support scalability and continued national anti-corruption activity after the project ends?
- How will the application of new knowledge and skills in the workplace be measured post-training?
- How does the project address any loss of skills in the medium to long term caused through staff rotation, retirement or resignation?
- What are the principal obstacles to continued application of an anti-corruption strategy after the lifetime of this project?
- How will national counterparts ensure continued maintenance, support and renewal of capital equipment supplied?

PARTNERSHIPS AND COOPERATION

- How would you describe the involvement and interest among the international community in helping the Arab Republic of Egypt respond to the challenges of corruption?
- How does the project coordinate its efforts with other international actors in the area of anti-corruption, money laundering, asset recovery?
- What areas exist for overlap with similar initiatives and how does the project address them?

LESSONS LEARNED

- What strategies have the project team developed to cope with challenges in project implementation?
- What examples of best practice have been discovered through this project?
- How has such best practice been exploited and disseminated?

MARKETING

- How has the project been marketed in general?
- How has the project marketed its achievements?

Invite interlocutor to add anything or to ask any questions

“Magic wand” question: If you had a magic wand and could change anything or do anything that would achieve an effective mechanism of anti-corruption, what would it be?

Thank interlocutor and invite to make further contact if anything else occurs to him/her

ANNEX III. DESK REVIEW LIST

- Addendum 01 to the Contribution Agreement No ENPI2011268-770 003
- Asset Recovery Workshop Report (24-26 April 2012)
- Amended Budget (6 December 2012)
- Basel Institute Mission Report: Development of a Curriculum and Delivery of Training in Asset Recovery Phase 1
- Basel Institute Scoping Mission Report (28 November 2012)
- Basel Institute Financial Investigations Pre and post-test results Phase 1 (27 Jan – 5 February 2013)
- Basel Institute National Training Curriculum in Asset Recovery (1 December 2012)
- Building the Capacity of Civil Society on the UNCAC Workshop Report
- Complaints Mechanism Workshop Report
- Consultations on drafting a law regulating conflicts of interest in Egypt (29-31 January 2013)
- Database Feasibility Study Mission Report (12-14 February 2012)
- EGYX49 Project Document (as Amended 6 Dec 2012)
- Minutes of the meeting between Mr. Masood Karimipour and HE Judge Ahmed Mikki, Egyptian Minister of Justice, 31 January 2013
- National Draft Anti-Corruption Strategy and Action Plan 2011
- National Draft Anti-Corruption Strategy and Action Plan 2013
- Opinions on the draft Freedom of Information law
- Plan for the Awareness Campaign
- Profi Project Progress Report Annual 2011
- Profi Project Progress Report Semi -Annual 2012
- Profi Project Progress Report Annual 2012
- Profi Project Progress Report Semi-Annual 2013
- Project Progress Report (narrative) October 2012
- Project Progress Narrative Report 28 February 2013
- Report on Assessment of the effectiveness of existing anti-corruption public complaints and reporting mechanisms and provision of recommendations to increase public awareness of these mechanisms
- Report on Technical Workshops for the Administrative Control Authority, on Refining Anti-Corruption Reporting Mechanisms and Witness Protection Schemes (18 – 19 December, 2012)

- Technical Advisory Meeting on Asset Recovery Report 21-23 January 2013
- Towards a National Anti-Corruption Strategy
- UNODC Commentary on Egyptian Witness Protection Bill

NON-UNODC DOCUMENTS:

- ACINET NGG Action Plan 2012-13
- ACINET Programme of Work (13 February 2013)
- Chatham House Egypt Dialogue Workshop Summary: Defining and Tackling Corruption (February 2012)
- EU Court of Auditors Special Report No 4/2013 'EU Cooperation with Egypt in the field of Governance'
- EU Results Oriented Monitoring Report (21.07.2011 – 20.07.2012)
- Global Partners & Associates Corruption in Egypt A. Puddephat (March 2012)
- Transparency and Integrity Committee Second Report "Action Priorities and its Mechanisms" Executive Summary²⁸
- United Nations Convention against Corruption: Implementation and Gap Analysis in the Egyptian Case , Hussein Mahmud Hassan, Social Contract Centre, 2010
- UNDP Strengthening Transparency and Integrity in the Civil Service Award Number 00056788 dated 2009 extended to 2013²⁹

²⁸ Available at <http://www.ad.gov.eg/NR/rdonlyres/1667E19E-DC90-4C7F-A315-7175AE7B4A52/1746/ExecutiveSummary2ndTICreportenglish2.pdf> accessed 20 August 2013

²⁹ Available at <http://www.undp.org/Portals/0/Project%20Docs/Gov%20Pro%20Doc%20Strengthening%20Transparency%20and%20Integrity%20in%20the%20Civil%20Service.pdf> accessed 20 August 2013