**FINAL INDEPENDENT PROJECT EVALUATION**

**Strengthening the Financial Investigation Capacity to Combat Money Laundering Arising from Trafficking in Persons and Smuggling of Migrants (XAMW33)**

**Region:** Algeria, Egypt, and Morocco  
**Duration:** Jan 2019 – Sep 2022  
**Donors:** Netherlands Embassy in Egypt  
**Evaluation team:** Rani Khoury (Lead Evaluator) & Firas Murrar (Substantive Expert)  
**Full report:** https://www.unodc.org/unodc/en/evaluation/reports_year_2023.html

**BACKGROUND AND CONTEXT**

The project "Strengthening the Financial Investigation Capacity to Combat Money Laundering Arising from Trafficking in Persons and Smuggling of Migrants (TIP/SOM)" (XAMW33) was a $2.3 million project implemented by the UNODC Regional Office for the Middle East and North Africa (ROMENA). The project is channeled through UNODC’s Anti-Corruption Program for the MENA region and is funded by the Netherlands Embassy in Egypt. Two project extensions extended the total project duration from 24 to 45 months, from Jan 2019 to Sep 2022. The project’s main objective was to increase the detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco.

**MAIN FINDINGS**

The design of the project was based on a thorough analysis of the context of the intervention and on official requests by participating countries, which translated into a project that is relevant to the needs and priorities of stakeholders. The objective and outcomes of the project were found to be in line with the priorities of the donor. Through an adaptive flexibility, the project responded effectively to the emerging needs and priorities identified during implementation, thereby maintaining the project’s strong relevancen throughout its duration. Furthermore, the project was found to be in line with the strategic programming of UNODC on the regional and international levels, as well as with the SDGs. The project fitted well within UNODC’s portfolio of projects in the region and was found to have built on and complemented other earlier and ongoing UNODC interventions. Therefore, the project was found to be part of a coherent effort by UNODC in the region. After beginning its 1st year on an efficient pace, the project faced considerable delays stemming from the COVID crisis that unfolded in March of 2020 and from difficult implementation in Algeria. Nevertheless, the project took several measures during implementation that helped raise its efficiency. The project was monitored well through a well-developed monitoring plan that included detailed annual reporting, as well as workshop reports, but the level of reporting of

![Number of activities implemented by the project by country and year](source: Developed by the evaluation team based on project design)
workshop results was inconsistent, and in at least one case, duplications were found in beneficiaries attending the same training sessions. In terms of effectiveness, the project resulted in higher capacities in participating countries to detect, analyze, and track money laundering cases, in particular the ones associated with TIP/SOM, but beneficiaries expressed the need for more practical and more advanced trainings. Having said that, the scope and magnitude of capacity building activities varied significantly between the different participating countries. The project also resulted in significant improvements in national-level coordination, some improvements in regional cooperation, but less so in terms of international cooperation. The project was found to have contributed to its overall objective of increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes mainly in Egypt and Morocco, but less so in Algeria. A host of sustainability measures, including ToTs, was included in the design and delivery of the project which contributed to the sustainability of results. Stakeholders and beneficiaries were found to be committed to continue working towards the results of the project after its end but require continued support. Human rights considerations were integrated in both the design and implementation of the project which was characterized by non-discrimination, inclusivity, and participation. Considerations of gender equality were included in the project design but given the predominance of males in the sectors targeted by the project, most beneficiaries and stakeholders were found to be men. The project was found to uphold the promise of 'leaving no one behind' across its activities, especially with respect to activates held in Sudan, but the issue of disability inclusion was not mainstreamed in the project’s design and activities.

LESSONS LEARNED

A key lesson learned from the experience of the project is to carefully assess the feasibility of implementing a project in each of the participating countries, and make sure that administrative and management arrangements are suitable for implementation. This lesson relates to the project’s experience in working with Algeria which carried a host of challenges that included a difficulty in arranging for activities due to the centralized decision-making approach followed in Algeria.

GOOD PRACTICES

Key good practices of the project include the project's efforts to keep providing support to Sudan through an adaptive flexibility, the project's unique focus on the financial side of TIP/SOM crimes, the adaptive responsiveness of the project in terms of effectively and swiftly responding to arising needs and priorities during implementation, and the project's response to the COVID crisis which helped minimize the loss in efficiency resulting from the crisis.

METHODOLOGY

A mixed method approach involving both qualitative and quantitative methods was utilized in this evaluation to ensure an inclusive methodology as well as triangulated findings. A mixed sampling strategy was utilized for the selection of informants for the fieldwork. Evaluation tools included a comprehensive desk review, in-depth semi-structured interviews, focus group discussions and observation of the final regional workshop.

For UNODC Regional Office of the Middle East and North Africa:

RECOMMENDATIONS

1. Management and Implementation Arrangements: Tailor future activities in Algeria to the unique working modality of Algerian authorities, specifically during the design phase.

2. Relevance and Effectiveness: Advance the technical level of capacity building to become more specialized, such as a further focus on virtual assets.

3. Cooperation and Effectiveness: Expand the scope of future activities to include more regional countries as well as involve receiving and sending countries.

4. Efficiency: Take measures to ensure that no duplication occurs among beneficiaries.

5. Sustainability: Utilize ToT beneficiaries to build capacities of other practitioners in the region in upcoming activities.

6. Gender Equality: Devise a gender equality plan to be integrated within the design of future projects in order to more effectively mainstream gender equality.