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**Final Independent Project Evaluation of the
Activities Conducted in the Mekong Region
under the
Global Programme Against Money Laundering,
Proceeds of Crime and the
Financing of Terrorism
2011-2016**

GLOU₄₀
Mekong Region

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This evaluation report was prepared by Mr. James A. Newkirk. The Independent Evaluation Unit (IEU) of the United Nations Office on Drugs and Crime (UNODC) provides normative tools, guidelines and templates to be used in the evaluation process of projects. Please find the respective tools on the IEU web site: <http://www.unodc.org/unodc/en/evaluation/evaluation.html>.

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ACRONYMS AND ABBREVIATIONS

AAPTIP	Australia-Asia Program to Combat Trafficking in Persons
AML/CFT	Anti-money laundering (AML) and combating the financing of terrorism (CFT)
ARIN-AP	Asset Recovery Interagency Network-Asia Pacific
ARLEMP	Asia Region Law Enforcement Management Program
ASEAN	Association of South-east Asian Nations
BCAMP	Border Control Agency Management Program
CLP	Core Learning Partner
CSO	Civil Society Organisation
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
GPML	Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism
ICRG	International Cooperation Review Group
IEU	Independent Evaluation Unit
ISS	Implementation Support Section
Lao PDR	Lao People's Democratic Republic
OCB	Organized Crime and Illicit Trafficking Branch
OECD - DAC	The Organisation for Economic Co-operation and Development - Development Assistance Committee
SDG	Sustainable Development Goals
STR	Suspicious Transaction Report
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
UNEG	United Nations Evaluation Group
UNOPS	United Nations Office for Project Services
UNTOC	United Nations Convention against Transnational Organized Crime

EXECUTIVE SUMMARY

The Project

According to the original GLOU40 project document, a key objective of criminal groups, organised crime and terrorist organisations is to accumulate wealth, with which they expand their activities. Detecting and/ or preventing money laundering is an approach intended to disrupt the activities of these groups. The international community works closely together to address money laundering and its effects on nations, within a framework overseen by the Financial Action Task Force, UN Security Council Resolution 1373, the UN Convention Against Transnational Organised Crime and the United Nations Convention Against Corruption. GLOU40 (*Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism*) fits within this context – providing assistance in addressing the fact and impacts of money laundering. GLOU40 is focused on encouraging anti-money laundering and policy development, raising public awareness about money-laundering and the financing of terrorism, contributing to the strengthening of governance and anti-corruption policies and acting as a centre of expertise on anti-money laundering, together with the UNODC Terrorism Prevention Branch. The Mekong region component of the Global Programme against Money Laundering (GPML) operates in Vietnam, Lao PDR, Myanmar and Cambodia, contributing to financial integrity and transparency, and to sound economic and financial environments in UN Member States. The Project has been financed since August 2011 by Switzerland to support the work of the GPML mentor¹ in the region. The initial funding agreement was from 2011 to 2013 - it was later extended to December 2016. In addition to the Swiss component for USD 1,617,000 over six years, the World Bank contributed USD 288,900 over two years, although this contribution is not a component of this evaluation. The Project Objective is to ‘Assist Member States to prevent and suppress illicit financial flows (IFF) from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT).’ There are three anticipated outcomes:

- Outcome 1 - Member States have available improved knowledge on illicit financial flows, money-laundering and the financing of terrorism.
- Outcome 2 - Member States have effective and updated AML/CFT legal frameworks, regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards.
- Outcome 3 - Enhanced national-level coordination and regional/international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters.

¹ GLOU40 is an example of UNODC’s mentor approach. The work of the ‘Project’ is solely the work of a designated mentor. The mentor for GLOU40 in the Mekong region is a senior specialist in AML/ CFT, with specific training in capacity-building, and was engaged specifically for these reasons. While the position is referred to formally as ‘Specialist Adviser’, in practice it is always and solely referred to as the ‘mentor’. For the purposes of consistency of language in this evaluation report, the word *Project* has been used to cover all aspects of and references to Advisor, Mentor and Project.

The Evaluation

The final evaluation was requested by the donor, as a component of the funding agreement, and was undertaken to provide accountability to the donor and other stakeholders in addressing whether or not project objectives were met. Evaluations are standard UNODC practice as defined in UNODC's evaluation policy, and the evaluation was guided by the UNODC Independent Evaluation Unit (IEU) in regards to quality assurance through the provision of guidelines, formats, assistance, advice and clearance on key deliverables during the evaluation process. IEU ensures that the GPML evaluation conforms with the United Nations Evaluation Group (UNEG) Norms and Standards. The evaluation, which focuses on the period from the mid-term evaluation through December 2016, analyses challenges and problems and considers areas of improvement, and provides a strategic framework in which the donor can consider future funding. The main evaluation users will be the GPML Programme Manager, the GPML AML/CFT Adviser for the Mekong Region, counterparts/ project stakeholders in the governments of Cambodia, Lao PDR, Myanmar and Vietnam and the Government of Switzerland, as donor. The evaluation report will be publically available.

The evaluation incorporated a gender-sensitive approach, in line with UNEG guidelines, and made use of a mix of qualitative and quantitative methods to gather and analyse data. The methods used included a desk review of documentation, interviews and a survey. The methodology specifically considered primary and secondary data sources. Having said this, the evaluation methodology was heavily qualitative - while some survey work was undertaken, it was limited in scope and provided only limited data for analysis. The evaluation had three stages: inception, field research, analysis/ synthesis/ reporting. A desk review of project documentation, triangulated with field research, and within the framework of the evaluation matrix defined in this document, was drawn together into a set of coherent findings. Based on these findings, the evaluator has drafted conclusions, and has, together with these conclusions, provided a set of lessons learned and recommendations. The synthesis/ analysis/ reporting phase ends with the provision to UNODC of this evaluation report.

Findings and Conclusions

Relevance

The Project demonstrates a high level of relevance in a number of key areas, including a clear and demonstrated relevance to the governments of the four focus countries of the Mekong region, a clear relevance to the financial institutions of these countries, demonstrated ownership on the part of Financial Intelligence Units in the four countries of AML/ CMT approaches and requirements, a clear and demonstrated relevance to the Sustainable Development Goals and a strong fit with a range of UN thematic areas and national, regional and global strategies.

Efficiency

Improvements are needed in the Project design – specifically the correlation of the logical frameworks of GLOU40 in the Mekong region with the GPML logical framework and in reporting on the activities and outcomes of GLOU40 in the Mekong region. It is not immediately clear to someone not directly involved in the Project exactly how GLOU40 activities in the Mekong region contribute to defined GPML outcomes/ objectives, and why. Digging is required into documents, and conversations with stakeholders to gain a full understanding of activities and results. All aspects of the Project, from funding processes through to reporting would benefit from a better telling of the 'story' of the Project, both in terms of result strategy and outputs/ outcomes. One component of this is ensuring the logical frameworks of each country that are part of GLOU40 in the Mekong region are correlated clearly with the GPML logical framework so that the activities and outputs in any given country can be clearly seen to contribute to GPML outputs and outcomes. It is important that an external reader of published

annual reports be able, from the reading, to understand what has been done in each Project result area (outputs and outcomes), and to see how each of these activities has contributed to Project results.

Feedback from interviews during field work indicates strongly that the ongoing negative impact of the newly introduced UN Secretariat-wide financial management system Umoja on the Project cannot be underestimated, and needs to be addressed. Administrative/ financial systems are, in principle, support systems to allow implementation to happen. In the current circumstance, the finance system not only impacts negatively on Project administration, slowing payments to suppliers and technical experts, it also detracts from Project implementation and results.

Partnerships and cooperation

The Project demonstrates significant focus on, contributions to and effective outcomes in the areas of collaboration, cooperation and partnership. The partnership focus of the Project adds significant value to the Project and to the work of partners. It is specifically noted that this partnership approach includes a range of national, regional and global organisations and initiatives, and includes partnership with the Project and the development of collaboration, directly, between these partners. As well, collaboration across technically focused agencies, within countries and regionally, the Project also plays a significant role in driving and coordinating donor efforts in the region, including the provision of advice and comment on the planning and implementation of programmes.

Effectiveness

Analysis of the findings from the evaluation indicate that the Project is providing strong outputs across all four countries of the Mekong region and is strongly contributing to the intended outcomes of GPML. These outputs are apparent in all three defined outcome areas of GPML, and based on the feedback and data from the evaluation can be summarised as follows:

- Countries are much more aware of the concept and reality of money laundering, as well as their obligation in dealing with money laundering according to international treaties to which they are signatories.
- Countries have much better defined national legislation and penal codes related to money laundering (although there remain roadblocks to actual prosecutions).
- Countries have a much deeper knowledge, particularly among practitioners in the Police and Customs, as to what defines money laundering, how money laundering can be disturbed in specific interventions at borders, how money laundering can be observed in investigative processes and how these investigative processes can be used in prosecutions.
- Countries have improved outputs in terms of Suspicious Transaction Reports and the interdiction of money flows at borders.
- Countries have much better cooperation nationally, between each other and with international organisations that contribute to more effective national and international practice in the interruption and prosecution of money laundering activities.
- Countries demonstrate a focus on upcoming Mutual Evaluations, and their obligations in meeting the requirements of these processes (although they express anxieties about actually successfully passing through the assessments).

Impact and sustainability

There is scope for impact from the Project, and for sustainability of Project initiatives/ outcomes, but neither of these are yet visible. Sustainability is most likely to come from practitioners, through embedding of changes in practice as improvements in knowledge and skills is extended to larger groups of police and customs officers. It is here, with these officers, and with the public servants of the FIUs, that good practice is likely to be demonstrated in the longer term, and where there are the most notable demonstrations of ownership of the approaches and priorities of the Project, and of AML/ CMT more generally. It is also important to mention legislation, and the related Penal Codes, in terms of sustainability. Legislation and the definition and application of Penal Codes have the most potential for longer term impact. As is noted in the Findings section, while real impact and sustainability will be found with practitioners, political will, and impetus from political leadership to ensure each country fulfils its FATF and related obligations, remains a critical factor in longer term change.

Human rights and gender

The Project give particular attention to certain specific and key human rights in delivery of Project activities and training programmes. These include the right to privacy and the principle of proportionality when national officials (police in particular) make use of their legislated powers in dealing with suspected perpetrators of money laundering crimes. There is no focus on gender in Project design, implementation or reporting, beyond ensuring, to the extent possible, a balance in participation in training initiatives.

Key Recommendations

Further discussion of recommendations can be found below, in the Summary Matrix of Findings, Evidence and Recommendations, and a full discussion in the Recommendations section below.

It is recommended that:

- The Project formally addresses with each counterpart country the specific needs they have in preparation for their Mutual Evaluations and recommends a programme of assistance.
- The Project strengthens focus in the area of financial investigations, across all four countries, and contributes to the extent possible to the development of the ARLEMP module in financial investigations (both its development and its delivery).
- The correlation between the design and work of the Project and GPML globally be clearly visible in the logical frameworks GPML globally and of GLOU40 in the Mekong region.
- Project reporting address all components of the GPML/ Project logical framework, including analysis of Project contributions to defined outputs, outcomes and the overall objective.
- UNODC addresses the key bottlenecks in financial and administrative systems to ensure that a) project activities are not hindered by administrative constraints, b) suppliers are not disadvantaged by late payments and c) counterparts are not dis-incentivised in their participation in events by unwieldy administrative or financial requirements.
- Discussions about the location of the mentor be held between GPML in Vienna and the Project, and that consideration be given to inclusion of key international and local partners.
- The Project continue with the strong focus on partnership development and implementation, between counterparts, between counterparts and international organisations/ agencies and between the Project and international organisations/ agencies.
- The Project, and GPML at the global level, undertake a gender analysis of the focus and priorities of GPML/ GLOU40, with a view to ensuring a) specific focus on gender mainstreaming in Project thinking, planning, implementation and reporting and b) that all activities and intended results of the Project give consideration to the impact of activities and results on men and women.

SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS

Findings ²	Evidence (sources that substantiate findings)	Recommendations ³
Key recommendations		
Each counterpart country has noted the importance of upcoming Mutual Evaluations and their need for assistance in preparations for the assessment process. In some cases specific requests were put to the evaluator related to this assistance.	Project Documentation Progress Reports Project Staff Interviews Stakeholder Interviews Survey Responses	It is recommended that the mentor formally addresses with each counterpart country the specific needs they have in preparation for their Mutual Evaluations and, together with the countries, prepare a programme of assistance. (GLOU40 Mekong region.)
Financial investigations, and the upskilling of relevant counterpart staff in this focus area of work, is an area of priority for counterparts and an area where effectiveness of activity can contribute to effectiveness of outcomes.	Progress Reports Project Staff Interviews Stakeholder Interviews	It is recommended that the Project strengthen its focus in the area of financial investigations, across all four countries, and contribute to the extent possible to the development of the ARLEMP module in financial investigations (both its development and its delivery). (GLOU40 Mekong region.)
Country logical frameworks do not provide any clear connection to the logical planning and structuring of the work of GPML globally – there is no clear correlation between the specific activities of the Project in counterpart countries and the work of GPML more widely. This correlation exists, and the work of the Project sits well within the framework of GPML, as is seen in the Findings section, but this is not visible in the logical frameworks.	Project Documentation Progress Reports Project Staff Interviews	It is recommended that beginning with any new funding arrangement, the correlation between the design and work of the Project and GPML globally be clearly visible in the logical framework of GLOU40 in the Mekong region. This will ensure the strategic links with GPML and will enable a better framework for reporting (on GLOU40 and on GLOU40's contributions to GPML overall). (UNODC Vienna – GPML Project Management, GLOU40 Mekong region.)
Project reporting does not contribute to straightforward access to and a facilitated understanding of all Project activities and outputs/ outcomes, and particularly does not do this in the overall context of the Project (and GPML) design. Currently, Project reporting does not provide an effective narrative for the Project – the <i>story</i> of the Project, including the work it does, the issues it encounters, its successes in the	Progress Reports Project Staff Interviews	It is recommended that Project reporting address all components of the GPML/ Project logical framework. It is important that the activities of the Project for a reporting period be reported on within this same framework, so that it is clear, strategically, why activities are being undertaken and what contribution they are making to outcomes. Where there have been issues in the development, design, implementation of

² A finding uses evidence from data collection to allow for a factual statement.

³ 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. This table summarised the evaluation recommendations, which are fully developed at section IV – Recommendations.

<p>Mekong region and its contributions to GPML more generally, is not readily available to an uninitiated reader.</p>		<p>activities, these should also be made clear, as should revisions to approach where these revisions are made to improve activity results or to more strongly contribute to outcomes. (UNODC Vienna – GPML Project Management, GLOU40 Mekong region.)</p>
<p>The ongoing negative impact of the Umoja implementation needs to be addressed in Bangkok and Vienna. The implementation of Umoja not only does not assist with Project implementation, but indeed detracts from Project activities and outcomes.</p>	<p>Progress Reports Project Staff Interviews Stakeholder Interviews</p>	<p>It is recommended that UNODC urgently addresses the key bottlenecks in financial and administrative systems to ensure that a) project activities are not hindered by administrative constraints, b) suppliers are not disadvantaged by late payments and c) counterparts are not dis-incentivised in their participation in events by administrative or financial requirements. (UNODC Senior Management/ GPML Programme Management.)</p>
<p>Important recommendations</p>		
<p>The issue of the location of the mentor was raised again during the evaluation, and it was clear that there are a number of benefits to be gained from a continued location in Hanoi, as well as benefits from re-locating to Vientiane, but no discussion have taken place to develop a clear perspective on this issue.</p>	<p>Project Documentation Progress Reports Project Staff Interviews</p>	<p>It is recommended that discussions about the location of the mentor be held between GPML in Vienna and the Project, and that consideration be given to inclusion of key international and local partners. No specific recommendation on the location of the mentor is recommended here, simply that a detailed internal discussion take place that canvasses the pros and cons of location, and impact on effectiveness, and that a decision be made on location for the next period of the Project. (UNODC Vienna – GPML Project Management, GLOU40 Mekong region.)</p>
<p>The Project demonstrates significant focus on, contributions to and effective outcomes in the areas of collaboration, cooperation and partnership. It is specifically noted that this partnership approach includes a range of national, regional and global organisations and initiatives, and includes partnership with the Project and the development of collaboration, directly, between these partners.</p>	<p>Project Documentation Progress Reports Project Staff Interviews Stakeholder Interviews Survey Responses</p>	<p>It is recommended that the Project continue with the strong focus on partnership development and implementation, between counterparts, between counterparts and international organisations/ agencies and between the Project and international organisations/ agencies. The intent of this recommendation is to provide significant support and impetus to the current partnership work, as it is seen as being of particular importance to the current successful Project outcomes, while adding value to the work and outcomes of a range of related initiatives. (GLOU40 Mekong region.)</p>
<p>There is no addressing in any Project documentation of gender mainstreaming nor any focus on human rights. The Project would benefit from some focus in these areas, to ensure, notwithstanding the technical nature of activities and focus, that the human implications of the Project, and the potential differential impacts of the Project benefit both men and women equally, and that the Project specifically addresses relevant human rights priorities.</p>	<p>Project Documentation Progress Reports Project Staff Interviews Stakeholder Interviews</p>	<p>It is recommended that the Project, and GPML at the global level, undertake a gender analysis of the focus and priorities of GPML/ GLOU40, with a view to ensuring a) a specific focus on gender mainstreaming in Project thinking, planning, implementation and reporting, b) a specific human rights focus in Project planning and c) that all activities and intended results of the Project give consideration to the impact of Project activities and results on human rights generally, and specifically on the rights of men and women. (UNODC Vienna – GPML Project Management, GLOU40 Mekong region.)</p>

I. INTRODUCTION



Map 1 - The Mekong Region - Project Location

PROJECT OVERVIEW AND HISTORICAL CONTEXT

As described in the original project document for GLOU40, in 2008⁴, a key objective of criminal groups, organised crime and terrorist organisations is to accumulate wealth, with which they expand their activities. Specifically, ‘Terrorists and terrorist organizations rely on money to sustain themselves and to carry out terrorist acts. Criminal groups and terrorist groups must disguise the origin of their wealth by ‘laundering’ their money. Money for terrorists is derived from a wide variety of sources and whilst terrorists are not necessarily so concerned with disguising the origin of money, they are concerned with concealing its destination and the purpose for which it is collected.’⁵ UNODC estimates the amount of

⁴ April 2008. Project Document: GLO/U40 Global Programme against Money Laundering, Proceeds of Crime, and the Financing of Terrorism (GPML). UNODC

⁵ April 2008. Project Document: GLO/U40 Global Programme against Money Laundering, Proceeds of Crime, and the Financing of Terrorism (GPML). UNODC.

money laundered globally in a year to be in the range of 2 - 5% (\$800 billion - \$2 trillion in current US dollars) of global GDP.⁶ Therefore, detecting and/ or preventing money laundering is an approach determined with disrupting the activities of these groups, and where possible to freeze and/ or confiscate these monies.

The international community, since the 1980s, has been working closely together to address money laundering and its effects on nations. Standards have been developed, and conventions implemented, within a framework overseen by the Financial Action Task Force (FATF). UN Security Council Resolution 1373, the UN Convention Against Transnational Organised Crime (UNTOC) and the United Nations Convention Against Corruption (UNCAC) are examples of these international frameworks.

GLOU40 fits within this context – providing assistance (in the context of this evaluation to the countries of the Mekong region) in addressing the fact and the impacts of money laundering.

The following background summary draws heavily on the evaluation Terms of Reference.

The Project GLOU40 – its full title is *Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism*, is focused on:

- Encouraging anti-money laundering and countering the financing of terrorism **policy development**;
- **Raising public awareness** about the cross-cutting aspects of money-laundering and the financing of terrorism;
- Contributing to the **strengthening of governance measures** and anti-corruption policies;
- Acting as a **centre of expertise** on anti-money laundering and, together with the Terrorism Prevention Branch, countering the financing of terrorism related matters.

The Programme is pivotal to UNODC’s mandate to prevent drug offences and other crimes, as it contributes specifically to a disruption of the financing of drug offences and other crimes. It offers specialized services and tools to help Governments remove the profits of crime, providing a disincentive to criminal actions. The project contributes to financial integrity and transparency, and to sound economic and financial environments in UN Member States, as a prerequisite for generating long-term sustainable development. The original project (GLOB79: 1996-31st March 2008) was substantively revised in 2007, when a first detailed results framework (Logical Framework) was added. For the successor project, GLOU40, with an original timeframe of 1 April 2008 through 31st March 2010, the framework was revised with the support of UNODC’s Strategic Planning Unit with a view to meeting UNODC’s standards.

Since the inception of the new project, GLOU40, in March 2008, GPML has undergone several project revisions, only two of which were substantive and resulted in an extended duration of the programme (1 April 2008 - 31 December 2015 and 01 April 2008 – 31 December 2019 respectively). In addition, the revised document refers to staffing and budget

⁶ <https://www.unodc.org/unodc/en/money-laundering/globalization.html>

changes in connection with the Implementation Support Section (ISS) of the Organized Crime and Illicit Trafficking Branch (OCB). In 2012, a project revision was undertaken to create an Adviser position with a focus on AML/CFT capacity-building for law enforcement agencies and to add Myanmar to the list of countries covered by the Adviser⁷. The previously advertised position came to an end and a new position was created. The non-substantive project revisions have been predominately administrative in nature with the purpose of transferring GPML mentors (P-4 temporary posts) from a UNOPS (United Nations Office for Project Services) segment to a UNODC Headquarters segment. The approved project budget has remained the same for these project revision purposes.

In August 2011, GPML and Switzerland entered into a funding agreement to **finance the work of the GPML mentor⁸ in the Mekong region**. The initial funding agreement was from 2011 to 2013, but it was later extended to December 2016. In addition to the Swiss pledge for USD 1,617,000 over six years, the World Bank pledged USD 288,900 over two years for GPML in the Mekong region. The GPML mentor covers four Mekong countries: Cambodia, Lao PDR, Myanmar and Vietnam. The mentor works directly with the national authorities in:

- The provision of advice related to anti-money laundering and combating the financing of terrorism (AML/CFT).
- Training and technical assistance to support the establishment, development and implementation of AML/CFT regimes.
- Raising awareness in government agencies, the legislature, the private sector, and the public at large, as appropriate.

The funding agreement with Switzerland required a mid-term independent project evaluation covering the period from August 2011 to December 2013. Overall, the evaluation found adequate evidence of achievement of outcomes, such as enactment of legislation, increased knowledge and awareness in implementing agencies, and an increased application of new knowledge by beneficiaries. The evaluation found early indications of the achievement of broader objectives, such as improvements in compliance with AML/ CFT laws, compliance with FATF standards, growing numbers of trained police, customs and prosecuting officials and some initiation of investigation, seizure and prosecution of cases in beneficiary countries. Nine recommendations were made by the evaluation, all addressed to GPML. As will be seen below, these nine recommendations (their implementation and their impact) is a specific component of the current evaluation. Switzerland has requested a Final Evaluation of the project covering the period from 2011 to 2016. UNODC evaluation policy requires a final project evaluation for all projects.

⁷ As indicated above, this is the formal reference to what is referred to universally as the ‘mentor’.

⁸ The Project Document (26/2/2008) makes specific mention of the success the GPML Mentorship programme has had, assisting Member States in ‘raising awareness, drafting AML/ CFT legislation, establishing/ reinforcing Financial Investigation Units, investigating and prosecuting money-laundering cases, and building asset forfeiture mechanisms.’

MAIN OBJECTIVES AND OUTCOMES

The current GPML design framework (somewhat revised from the original design in 2008, but with a visible ‘flow’ from the original design) can be found below.

Project Objective

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

Outcome 1

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

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

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

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

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

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

Outcome 2

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

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

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

Outcome 3

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

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

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

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

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

LINKAGE TO UNODC STRATEGY CONTEXT AND TO SUSTAINABLE DEVELOPMENT GOALS

GLOU40 was developed under the UNODC Strategy for the period 2008-2011. In implementing its strategy over the biennium 2008-2009, UNODC responded to the growing demand for its services by establishing a strongly integrated mode of programme planning and implementation. Under the new structure of the UNODC strategic framework for the biennium 2012-2013, GLOU40 fell under the thematic sub-programme 1: *Countering transnational organized crime and illicit trafficking, including drug trafficking*. In line with this strategic framework, UNODC also adopted a *Thematic Programme on Action Against Transnational Organized Crime and Illicit Trafficking, Including Drug Trafficking* that set out the strategic priorities for UNODC for 2011-2013. This Thematic Programme provided a coherent and comprehensive approach to efforts to prevent and combat all forms of transnational organized crime.

GLOU40 both informed and was further developed in the framework of the Thematic Programme and, specifically, fell under Sub-Programme 2 of the Thematic Programme: Regional and National Capacity Building and Technical Assistance. GLOU40 was also aligned under Sub-Programme 2 and gave practical application to the Thematic Programme, developing global solutions to critical challenges and both supporting and delivering direct technical assistance, in close consultation and coordination with the regional offices.

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

Through the United Nations Sustainable Development Goals adopted last year, the international community has committed itself to the promotion of peaceful and inclusive societies for sustainable development, to the provision of access to justice for all and to the building of effective, accountable and inclusive institutions at all levels (Sustainable Development Goal #16). In doing so, the UN has collectively committed to combat all forms of organized crime. GLOU40 is intended to contribute to achieving Sustainable Development Goal (SDG) 16.4: *By 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime*.

Contribution to UNODC's country, regional or thematic programme

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

- Result area 1.2 - International cooperation in criminal justice matters.
- Result 1.2.2 - Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering and the financing of terrorism in accordance with relevant General Assembly (GA) resolutions.
- Result 1.2.3 - Strengthened capacity of Member States to establish comprehensive and effective regimes against money-laundering related to organized crime, drug trafficking and corruption.

The Programme contributes to the following country and regional programmes:

- Country Programmes:
 - Links to Sub programme 2 (Criminal Justice): Outcome 4 (Anti-corruption/ Money Laundering – Improved cooperation concerning matters of corruption and money laundering) of the Laos Country Programme.
 - Links to Sub programme 2 (Corruption And Money Laundering): Outcome 2 (Money laundering activities identified and effectively acted on and criminal assets recovered) of the Vietnam Country Programme.
- Regional Programmes:
 - Links to Sub programme 2 (Governance/ Rule of Law): Outcome 2.3 (Anti-Money Laundering – money laundering activities identified and effectively acted on) of the Regional Programme on East Asia and the Pacific.
 - Links to Sub programme 1: Outcome 4 of the South Asia Regional Programme - Strategies and programmes to prevent and combat money laundering and financing of terrorism adopted and implemented by relevant authorities.
- The Programme contributes to the following thematic programmes:
 - Thematic Programme on Action against Transnational Organised Crime and Illicit Trafficking, including Drug Trafficking.

PURPOSE OF THE EVALUATION

Per the evaluation Terms of Reference:

- The final evaluation was requested by the donor, Switzerland. The request for this final evaluation was embodied in the original funding agreement and in its subsequent amendment. The donor requested a final evaluation to be conducted at the end of 2016.
- The evaluation is being conducted to provide accountability to the donor by determining whether the project objectives were met and if resources were wisely utilized.
- The ultimate goal of the evaluation is to set priorities and goals, to suggest new strategic direction and to allow the donor to utilise the evaluation outcomes to consider future funding. The Programme conducted detailed discussions with the donor to enquire if future re-funding will be possible. The representative from Switzerland confirmed that the evaluation outcomes and findings will be used by Senior government officials to leverage future funding from Switzerland.

- Another reason is also to identify areas of improvement, if needed and to clarify any problems and/ or challenges encountered.
- The evaluation focuses on the time period since the previous mid-term evaluation in 2014 until December 2016.⁹

Furthermore, the extent to which human rights aspects and gender mainstreaming have been taken into account during all phases of the Project will be assessed.

The evaluation was conducted by James Newkirk, an independent evaluation consultant based in Serbia, and was guided by the UNODC Independent Evaluation Unit (IEU) in regards to quality assurance in situ and from headquarters through the provision of guidelines, formats, assistance, advice and clearance of all deliverables during the evaluation process. IEU further ensures that the GPML evaluation conforms with the United Nations Evaluation Group (UNEG) Norms and Standards.

The main evaluation users will be the GPML Programme Manager, the GPML AML/CFT Adviser for the Mekong Region, counterparts/ project stakeholders in the governments of Cambodia, Lao PDR, Myanmar and Vietnam, the Government of Switzerland, as donor and UNODC senior management and programme managers. Other stakeholders, who have been partners in the implementation of the programme activities, including non-governmental organizations and private sector entities, will also be consulted as key informants during the evaluation.

SCOPE OF THE EVALUATION

Unit of analysis	Part of the Programme (Mekong region)
Time period of the project/programme covered by the evaluation	January 2014 – December 2016/Mekong region
Geographical coverage of the evaluation	Mekong region, covering Cambodia, Lao PDR, Myanmar and Vietnam.

PAST EVALUATIONS

There have been two evaluations of the programme – an in-depth evaluation in 2010 of the whole of the GLOU40 programme and a mid-term evaluation of GLOU40 in the Mekong region in 2014. The findings, conclusions and recommendations of these evaluations have informed the analysis of the current assignment. The mid-term evaluation is of particular relevance to the current evaluation, and the recommendations of the mid-term evaluation are discussed in the Findings section below.

⁹ Evaluation Terms of Reference.

EVALUATION CRITERIA

The evaluation was conducted based on the OECD/ DAC criteria: relevance, efficiency, effectiveness, impact and sustainability, as well as partnerships and cooperation, gender and human rights and lessons learned.

The evaluation methodology was designed to conform to the Norms and Standards for Evaluation in the United Nations System¹⁰ and the Evaluation Norms, Guidelines, Templates and Standards at UNODC.¹¹

The evaluation approach and methodology were also prepared to conform specifically to the frameworks visible in UNEG's guidance note on integrating human rights and gender equality in evaluation¹² as well as UNODC's Guidance Note on Gender Mainstreaming.

EVALUATION APPROACH

To the extent possible, the evaluation incorporated a gender-sensitive approach, in line with UNEG guidelines, and made use of a mixed-methods approach, with a mix of qualitative and quantitative methods to gather and analyse data. The intent of this approach was to ensure the evaluation offered diverse perspectives, and promoted the participation of different groups of stakeholders. An initial group of stakeholders, and potential interviewees, was defined in the evaluation Terms of Reference. During the inception phase, the evaluator discussed with GPML/ GLOU40 representatives the full range of Project participants, and those with knowledge of the Project, as well as who should be interviewed, or surveyed. A final agreement was described in the Inception Report, although further interviewees were nominated during field work. In this evaluation, the methods used included a desk review of documentation, interviews and a survey. The methodology specifically considered primary and secondary data sources. Having said this, the evaluation methodology was heavily qualitative - while some survey work was undertaken, it was limited in scope and provided only limited data for analysis.

The evaluation had three stages: inception, field research, analysis/ synthesis/ reporting. Each are discussed below.

Inception

The intent of the inception period was for the evaluator to develop a detailed understanding of the project, and of the evaluation, and to fully prepare the evaluation approach and methodology. The inception period began with early discussions with the project team, refinement of the questions to be addressed by the evaluation (beginning with the questions provided in the Terms of Reference) and a review of all relevant documentation (as provided by the project team) in line with the evaluation questions.

¹⁰ June 2016. Norms and Standards for Evaluation. UNEG.

¹¹ <http://www.unodc.org/unodc/en/evaluation/normative-tools.html>

¹² 2011. Integrating Human Rights and Gender Equality in Evaluation – Towards UNEG Guidance. UNEG.

Preliminary Analysis

On the basis of these early discussions and document review, a preliminary analysis of the project was undertaken, and a detailed evaluation approach and methodology (including field instruments) was prepared. Preliminary findings, framed against evaluation questions, the revised questions themselves, and an evaluation matrix (structured against OECD/ DAC criteria and the evaluation questions, and with preliminary findings included) were prepared. A detailed evaluation time frame was drawn up. All of this material was pulled together into an Inception Report which formed the basis of the work of the evaluation. Key components of the Inception Report included:

- The evaluation approach and methodology.
- The refined set of evaluation questions.
- The evaluation matrix.
- The evaluation field tools (interview sheets and survey questions).
- The evaluation timeframe (including agreed dates for field research and delivery of each of the evaluation deliverables).

Inception Report

The final Inception Report was the first deliverable of the evaluation.

Field Research

Following the inception phase, the evaluator undertook field research. Together with the document review undertaken during the inception phase, the field research, with its focus on primary data, is the key aspect of the evaluation.

Interviews

During the field research, all relevant project stakeholders were approached for their comments/ feedback on the project, within the framework of the evaluation questions. These approaches were undertaken through face-to-face and Skype/ phone interviews. Face-to face interviews were preferred, whenever possible. Interviews were undertaken with stakeholders in Vietnam, Lao PDR, Myanmar, Cambodia, Australia, England, the USA, Switzerland, the Republic of Korea and Vienna. A total of 26 people were interviewed, including 16 men and 10 women. See Annex IV for details of interviewees.

Interviews followed the general structure of questions referred to above, but with modifications and refinements as required, subject to the type of stakeholder and their level of detailed knowledge of the project. A template interview guide is attached at Annex II – Evaluation Tools. A field trip was organised for the week of 9 December 2016. The field work included face-to-face interviews in Vietnam and Lao PDR, as well as Skype interviewees as described above. As there was only one interviewee in each of Myanmar and Cambodia, it was determined that it would be a more effective use of time to do these interviews via Skype and to focus on face-to-face interviews in Vietnam and Lao PDR.

Survey

A survey has been prepared for representatives of partners/ stakeholders involved in GLOU40. Due to logistical constraints imposed by the Umoja system and the organisation of the evaluation late in the calendar year, the survey could only be translated into Vietnamese. As a result, distribution of the survey was also only possible in Vietnam. There were other

constraints on survey distribution, including the need for permission for agency staff to be approached, the control of distribution by the national agencies and issues with availability of email addresses. As a result, it is not known how many people were requested to complete surveys. A total of 16 survey responses were received. Given the small number of responses, and the geographic limits of these responses, the survey was not used extensively to inform evaluation analysis – it has provided some confirmation in the areas addressed in the survey questions. A summary of results of the survey can be found at Annex IV – Responses to the Survey.

Analysis/ Synthesis/ Reporting

Based on the desk review of project documentation, and the undertaken field research, and within the framework of the evaluation matrix/ evaluation questions defined in the Inception Report, the evaluator synthesised and analysed the findings of the field work. This synthesis/ analysis was drawn together into a set of coherent findings, based on the research (this document). Based on these findings, the evaluator has drafted conclusions, and has, together with these conclusions, provided a set of lessons learned and recommendations.

The synthesis/ analysis/ reporting phase ends with the provision to UNODC of this draft evaluation report. This finalisation has two components. The first component is the drafting of the evaluation report, based on the work of the evaluator during the inception phase and the field research. After the Draft Evaluation Report is cleared by the IEU, it will be shared with CLPs for comments on factual errors. Following any comment from the CLPs, the evaluator will finalise the Report. This final draft will then be cleared by the IEU.

DATA SOURCES

The main data sources consist of programme documentation and project stakeholders reached by interviews and survey.

Documents. All secondary documentation has been initially assessed by the evaluator, and will be accessed again during later stages of analysis and reporting. Additional documents were also requested and provided, specifically the country-focused logframes. A full list of reviewed documentation can be found at Annex II.

Stakeholders. Stakeholders include all those to be invited to participate in interviews, and/ or to respond to the survey, including the Core Learning Partners. Per documentation provided by the Project, the Core Learning Partners are those found in the table below.

Entity	Name	Title
UNODC Manager	Mr. Tofik Murshudlu	Chief
Donor	Ms. Irene Frei	Economist
Donor	Mr. Reto Weyermann	Program Manager
GPML	Mr. Oleksiy Feshchenko	GPML Programme Manager
GPML	Mr. Michiel van Dyk	Anti-Money Laundering Adviser
GPML Mentor	Mr. Chris Batt	Adviser (AML/CFT)
Vietnam	Mr. Pham Van Uong	Colonel, Deputy Head of Counter Terrorism Department
Vietnam	Mr. Hoi	Captain, Standing Office, Counter Terrorism Department
Vietnam	TBC	Leader of Department, Anti-Smuggling Department,

		Customs General
Vietnam	Mr. Khue	Deputy Head of Division, Anti-Smuggling Department, Customs General
Vietnam	Ms. Le Thi Hoa	Vice Director of Division, Department of Criminal and Administrative Law Department. MOJ
Vietnam	Anita Dodds	Coordinator ASEAN Law Enforcement Program Viet Nam
Vietnam	Mr. Matt Tromme	Former UK Department for International Development (DFID) Hanoi
Lao PDR	Ms Phengsy Phnegmoung	Director of the FIU
Lao PDR	Mr James Toone	Deputy Head of Mission UK Embassy
Cambodia	Mr Chea Samnang	Cambodian Customs
Asia Pacific Group (APG)	Mr. David Shannon	APG
Myanmar	Mr Kyaw Win Thein	Director FIU

- The Core Learning Partners (CLP) are the main stakeholders, i.e. a limited number of those deemed as particularly relevant to be involved throughout the evaluation process, in reviewing and commenting on the ToR and the evaluation questions, reviewing and commenting on the draft evaluation report, as well as facilitating the dissemination and application of the results and other follow-up action. CLPs are a cross-cutting categorisation.
- All stakeholders can be found in the following categories –
 - UNODC HQ.
 - Other UNODC (GPML).
 - Counterparts and other stakeholders of the partner countries.
 - Other UN Agencies.
 - Other agencies/ stakeholders in partner countries or other countries.
 - Donor representatives.
 - Project staff.

TRIANGULATION

Denzin¹³ identified four basic types of triangulation:

- Data triangulation: involves time, space, and persons.
- Investigator triangulation: involves multiple researchers in an investigation.
- Theory triangulation: involves using more than one theoretical scheme in the interpretation of the phenomenon.
- Methodological triangulation: involves using more than one method to gather data, such as interviews, observations, questionnaires, and documents.

Of these four basic types of triangulation, this evaluation made some use of data triangulation through comparison of primary and secondary sources and most use of methodological triangulation, which involved the survey responses, document review and field interviews

¹³ Denzin, N. (2006). *Sociological Methods: A Sourcebook*. Aldine Transaction.

with a variety of stakeholders such as donors, counterparts and UNODC staff in the field and at HQ.

LIMITATIONS TO THE EVALUATION

The evaluation was undertaken by one evaluator – which impacts on triangulation as there is no possibility of investigator triangulation. To mitigate this, emphasis was placed on triangulating data sources and methods, through documentation and breadth of interviewee background.

As discussed above, there were limitations to the contributions of the survey to the evaluation – to its extensiveness of use and contributions to analysis. The survey could not be translated except into Vietnamese, so no other counterparts were surveyed. Further, given national approval processes (and control of distribution of instruments such as this survey), it is not possible to know how many recipients there were for the survey, nor exactly whom they represented.

Some aspects of the survey processes were impacted by the late timing of the evaluation in the UNODC financial year processes, which made it impossible to organise translation.

All work of the evaluation in Cambodia and Myanmar was via Skype, with only one interview in each country.

It is noted that the evaluation addresses only the Mekong segment of GLOU40, and not the overall programme.

A significant focus of the project design and implementation is the mentor position. It is noted therefore that both inputs and outputs are constrained within this framework. While not strictly a limitation to the evaluation, it is important to note the relative constraints on activities and outputs.

EVALUATION QUESTIONS

The full set of Evaluation Questions can be found at Annex V – Evaluation Matrix. The questions in the Evaluation Matrix are the full set of Evaluation Questions agreed in the evaluation's Inception Report.

II. EVALUATION FINDINGS

DESIGN

The evaluation was specifically asked to address ‘the extent to which the implementation of the recommendations of the mid-term evaluation lead to improved design of the programme?’ In addressing this question during the evaluation, focus was placed on an obvious implementation of the recommendations, correlation between the recommendations and the subsequent Project approach and confidence of Project personnel in Project approaches. The table below looks at each recommendation from the mid-term report¹⁴, and provides detail on the current status of implementation.

Recommendation	Status
Recommendation 1: UNODC should continue to focus on mentoring as a mechanism for delivering technical assistance (TA) on operational aspects of AML/ CFT system. That said, UNODC should also consider commissioning a specific study (in-house or external) to examine and demonstrate comparative cost-benefit analysis of various TA delivery mechanisms on AML/CFT.	Although the specific study was not seen by the evaluator, according to project documentation, a comparison of mentor deployment versus the use of consultants was undertaken by GPML, with the mentor approach being clearly a more cost-effective time-effective approach. GPML has continued to expand the use of mentors in other regions. In this context, this recommendation had no direct impact on implementation – other than as a confirmation of the mentor approach which continues to be used in GLOU40 in the Mekong region.
Recommendation 2: Data collection on use of training and mentoring needs to be made more systematic and routine. The mentor must send out a follow up survey 6 months after completion of training to collect data on its use.	The mentor is collecting feedback from training participants, and also receives specific feedback from agencies. However, there is as yet no implementation of a systematic and routine collection on data of use of training and mentoring. It is understood that a Survey Monkey type system is being considered at GPML, but it has not been implemented.
Recommendation 3: GPML should develop mechanisms for consultation with donors and partners organizations on results framework and annual strategic priorities on an on-going basis.	The expressed view in documentation and field discussions is that reporting to donors and partners has improved, but as is discussed in more detail in the Efficiency section below, there is room for improvement in the use of the results framework and in reporting in relation to the intended results.
Recommendation 4: GPML should promote, establish and nurture local and regional networks to facilitate greater interaction among direct and indirect beneficiaries to have a greater impact on AML/CFT situation in the beneficiary countries.	This is a significant component of the activities and outputs/ outcomes of the mentor. The narrative below related to Outcome 3, in the Effectiveness section, addresses this component in detail.
Recommendation 5: UNODC/ GPML needs to develop better reporting systems to report results information for continued support from donor and partner organizations.	While there are improvements in reporting noted by GPML, the mentor and the donor, reporting remains a weakness. This issue is discussed in detail below, in the Efficiency section.
Recommendation 6: UNODC/ GPML should consider moving the mentor to a different country in the Mekong region once it is determined that	GPML undertook consultations with donors and key partners and determined that the overall approach to GLOU40 implementation in the Mekong region was best served by continuing to base the mentor in

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https://www.unodc.org/documents/evaluation/Independent_Project_Evaluations/2014/GLOU40_Mekong_Region_Independent_Project_Evaluation_Report_June_2014.pdf

Vietnam is on a sustainable path.	Hanoi. Up-to-date discussions on this issue are found below, in both the Efficiency and Effectiveness sections. In summary it can be said that there is no clear path going forward; there are strong reasons for the mentor to remain in Hanoi and strong arguments for a shift to Vientiane.
Recommendation 7: GPML should provide greater incentives for increased responsiveness to partners by inviting appropriate colleagues from partner organizations to provide inputs into mentor's annual performance reports.	While the mentor was co-funded by the World Bank, this recommendation was implemented to allow the Bank to provide inputs. This co-funding is no longer the case and there is no on-going provision of inputs from partner organisations to annual performance reporting, which is a strictly UNODC internal system.
Recommendation 8: UNODC/ GPML needs to work with FRMS and donors to develop financial reports that provide granular information required by the donors.	GPML and the donor agreed on new financial reporting in 2015, as a result of this recommendation. It is noted that per this new system, annual reports to the donor are to be provided by 30 June of the following year. No report for 2015 (due 30 June 2016) has yet been received by the donor.
Recommendation 9: UNODC should collaborate with the World Bank and other partner organizations to undertake national risk assessments on a priority basis.	This recommendation has been fully implemented, and this approach forms part of the mentor's ongoing work. The World Bank is currently in Vietnam undertaking a national risk assessment, and the process is also under way in Laos. The mentor remains in regular contact with the relevant World Bank representative. Further, the mentor is providing assistance to the establishment of these processes in the Pacific Islands, through APG ¹⁵ .

While the recommendations improved some aspects of the design of the programme, it cannot be said that they were, overall, taken up by GPML or GLOU40 in the Mekong region to a great extent, nor were they of significance to the Project's current design. Recommendations 3 and 5 are particularly noted for a lack of visible impact to Project design and implementation – as will be seen below, these remain areas for improvement.

There is a lack of correlation between the GPML logical framework and the logical frameworks used by the Project in the four countries. While it is understood that the donor requested a specific logframe of activities for each country for the additional funding period, it is not clear why these country logframes do not correlate more closely with the GPML results framework.

- The GPML logframe in the evaluation Terms of Reference clearly defines what the Project does. The mentor is conversant with this logframe, and there is a clear relationship between discussions on approaches and activities and this results framework.
- However, the GPML logframe is not the logframe which provides the Project with activity and reporting frameworks for Project work in the Mekong region. There are different logframes for each country, and these do not correlate to GPML's logical framework.

This lack of correlation detracts from the Project's strategic coherence and from the ability of GPML to effectively provide a narrative about the project. Project reporting is done against country logframes, which is understood to be based on the donor's need for reporting against the activity frameworks that were agreed. In the context of this discussion, however, this means that the work of the Project in addressing and delivering GPML outcomes is not addressed in a way that provides a necessary strong narrative as to the work of the Project, and the Project's outcomes against the GPML results framework.

	GPML	Vietnam	Myanmar	Laos and Cambodia
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¹⁵ APG is the Asia Pacific Group – the designated regional body for FATF in South-east Asia and the Pacific. (<http://www.apgml.org>).

Overall Objective	Assist Member States to prevent and suppress illicit financial flows (IFF) from drugs and crime and to implement UN conventions and internationally accepted standards for AML/CFT.	Enhanced financial integrity and reduced criminal harm through the implementation of anti-money laundering and the counter financing of terrorism (AML/CFT) policies, which are compliant with international standards.		
Outcome 1	Member States have available improved knowledge on illicit financial flows, money-laundering and the financing of terrorism.	Working with donors (notably IMF) secure the adoption of a more effective AML/CFT law more compliant with international standards.	Adoption of a more effective AML/CFT legislation, compliant with international standards.	Working with donors, secure the adoption of a more effective AML/CFT laws more compliant with international standards
Outcome 2	Member States have effective and updated AML/CFT legal frameworks , regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards.	AML/CFT policies are included in relevant national strategies (anti-corruption and national development strategy)	AML/CFT policies are included in relevant national strategies	AML/CFT policies are included in relevant national strategies
Outcome 3	Enhanced national-level coordination and regional/international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters.	Relevant Ministries, Agencies and Organisations including the State Bank of Viet Nam (Anti-Money Laundering Department) Customs, The Ministry of Public Security (Police) Ministry of Justice, Government Inspectorate and the State Securities Commission address AML/CFT deficiencies more effectively through.	Relevant national agencies: Central Control Board on Money Laundering, The Financial Intelligence Unit (FIU), Ministry of Finance and Revenue, , Ministry of Home Affairs, The Myanmar Police Force (Department against Transnational Crime and the Bureau of Special Investigation), Customs Department and the Central Bank of Myanmar fight ML/FT more effectively through.	Relevant Ministries, Agencies and Organisations including the National Bank of Cambodia and Bank of Lao PDR (including FIU) Customs, Police and Ministry of Justice, address AML/CFT deficiencies more effectively through.

RELEVANCE

Throughout Project documentation and across all responses to questioning during evaluation field work, it is particularly clear that there is a direct relationship between the agendas of the four focus countries and the work of the Project. The evaluator heard extensive feedback to this effect, and responses to the survey questions in this area were strongly supportive of the relevance of the project, and the AML/ CFT agenda to Lao PDR, Myanmar, Vietnam and Cambodia. These four countries accept completely their external obligations in relation to AML/ CFT, and particularly in terms of

FATF recommendations, and they each note the direct correlation between the design framework of GPML, the specific work of the Project and these obligations. The following dot points are examples/ commentary, indicating Project relevance, provided by stakeholders in each country during field interviews:

- Vietnam made it clear during the evaluation that government decisions have been adopted and national action plans established to address AML/ CMT, and expressed their commitment to compliance with FATF/ APG conditions/ guidelines.
- Cambodia noted the high commitment of the Government to addressing money laundering, a commitment visible in the structure of the AML/ CMT committee of government and the existence of the specific AML group in Cambodia Customs.
- Lao PDR noted that its early lack of compliance was a product of its initial lack of understanding. They also note that their current clear commitment comes from their growth in understanding. The Lao PDR FIU has grown from 9 to 29 staff, has been shifted from the Bank of Law to the National Coordinating Committee, and indeed is the Secretariat to this Coordinating Committee.
- Myanmar expressed its desire for assistance in addressing the specific problems it will face in the near future through the mutual assessment process. There is a certain degree of understanding within government of the risks the ICRG process has for Myanmar, but this understanding is not deep. Further, it is clear that addressing legislative deficiencies and related requirements will be difficult without external support.

Each of the countries where the Project works, but is not resident, sought greater inputs from the Project, particularly but not limited to the upcoming mutual assessments with FATF:

- Myanmar requested a series of specific workshops as they prepare their Mutual Assessment process.
- Lao PDR requested a greater number of visits, or longer visits, or both, as they work to embed AML/ CMT frameworks and procedures in government approaches.
- Cambodia sought greater support for skill development with officers at border checkpoints, as the extent of training to date has not been sufficient in reach.

These requests are noted here as indicators of the relevance of the GLOU40 agenda in the Mekong region and approaches to focus countries.

The core of the work of the Project is FATF, the Financial Action Task Force discussed above. FATF has existed since 1989 and specifically addresses the damage that money laundering can do to national economies and the global economy. The FATF has a set of 49 national standards (called recommendations), and an assessment methodology against which countries are measured. Where a country performs poorly, they can be placed under review, and an action plan can be created. If improvements do not happen the country can be placed on the International Cooperation Review Group (ICRG) list. There are actually two different classifications per the ICRG, referred to generally as the 'grey list' and the 'black list'. At the initiation of GLOU40 in the Mekong region, AML/ CMT was not on national agendas, and each of the four countries was in danger of being listed.

In discussing the adaptation of GLOU40 strategies/ approaches during implementation it is worth noting that the GPML design framework reflects, to a certain extent, the shifting priorities in the Mekong region, and therefore provides a certain flow to the changing focus of the Project.

Counterparts note that early on in GLOU40, the concept of money laundering was completely new to officials in the four countries. In this context, the clear focus was on awareness-raising (Outcome 1). With time, and within the shifting focus, a greater emphasis was given to policy change and legislative developments (Outcome 2). Throughout this, but with a somewhat growing focus, attention has been given to development of and/ or participation in Mekong regional and global networks (Outcome 3). The Project/ mentor has demonstrated the capacity to shift focus and geographic/ programme emphasis subject to specific needs.

There is a very clear and strong link in the Project's design, and implementation, to established priorities defined in the Sustainable Development Goals (SDGs). The SDGs are prevalent in the design of GLOU40 – specifically SDG 16.4: *By 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime*. The technical assistance and training of the Project is geared towards assisting the four target countries in the Mekong region to achieve this – with a particular focus on the reduction of illicit financial flows. All of the work of the Project with national governments (FIUs, Customs, Police) is focused on improvements in legislative frameworks, policy frameworks and practice in addressing illicit financial flows.

There is a clearly stated and visible correlation in design and reporting between UNODC strategy frameworks and the specific activities of GLOU40. GLOU40 works under the Thematic Programme on Action against Transnational Organised Crime and Illicit Trafficking, including Drug Trafficking . The activities of the Project focus on international cooperation in criminal justice matters (APG, FATF, ARIN-AP), which is result area 1.2. Within this result area, there are specific results related to capacity of Member States to 'establish comprehensive and effective regimes against money-laundering', which is clearly the specific intent of the project, as well as the outcome of the work of the mentor. As stated above, in the Mekong region, GLOU40 is firmly placed, strategically, within the Criminal Justice sub-programme of the Lao PDR Country Programme and the Corruption and Money Laundry sub-programme of the Vietnam Country Programme of UNODC. Regionally, GLOU40 makes direct contributions to outcomes in the Governance/ Rule of Law sub-programme (anti-money laundering) for the Regional Programme on East Asia and the Pacific and to outcomes in the anti-money-laundering sub-programme of the South Asia Regional Programme.

EFFICIENCY

According to discussions with GPML management, a cost comparison exercise was undertaken that compared outputs from consultancy inputs with outputs from mentor inputs and demonstrated the greater cost effectiveness from the mentor approach. As well, according to comments from field interviews, the administrative costs of maintaining a single professional, technical specialist are less than maintaining a full project office. A mentor is more nimble than a project team, and can make decisions to change the specifics of activities with greater efficiency than working within a specified set of activities. This has been demonstrated in GLOU40 in the Mekong region, with specific directions and activities being modified subject to strategic requirements (but within the overall strategic framework). There are obvious risks and challenges to a mentor approach: the potential for a dependence on an individual and the difficulties inherent in ensuring a balance of effort and activity across a diverse geography. These challenges are understood by GPML, and the Project, and Project strategy and action planning is undertaken in the knowledge that these challenges must be considered at all times.

The Project has planning processes in place to ensure a) the relevance of activities and b) the implementation of these activities in a timely and cost-efficient way. Planning processes with relation

to budgeting take place on an annual basis, at the Project office, and are then approved by Vienna and administered by Bangkok, as the Umoja system deals with payments through regions, not countries.

Based on feedback provided to the evaluation, it cannot be said that the Umoja financial system has contributed to Project efficiency, nor that it is supportive of Project implementation. The implementation of Umoja has had, and continues to have a negative effect on the Project, administratively and in the context of implementation, a fact that was commented on extensively in interviews with Project and UNODC personnel in the Mekong region and Vienna, as well as by other project stakeholders in the Mekong region. Current and ongoing issues include the non-payment of invoices for consultants and facilities, particularly slow processes in organising events, extreme lack of flexibility in event organisation that impacts on participation. In the Umoja system, each person is 'mapped' for specific functions. Over a year into Umoja implementation, no-one in the Vietnam UNODC office is yet 'mapped' to do payment requests, which means all payment requests are handled in Bangkok, where only one person handles all such requests for the region, which means all payments are done very slowly, simply due to work load. As well as these specifically administrative issues, the system has caused the loss of goodwill from national counterparts that has a direct impact on effectiveness of Project implementation – for example, some partners will not participate in Project events/ programmes due to the changes in participation processes caused by the implementation of Umoja and the requirements of the system, and there are examples of suppliers waiting a lengthy period of time for payment, as a result of which they will not provide further services to the Project.

There are mentioned improvements in financial reporting as a result of changes made after the mid-term evaluation. Having said this, it was noted that the 2015 annual financial report was not provided on time (due 30 June 2016) and has yet to be received by the donor.

Narrative reporting is done in a timely fashion, and largely fulfils donor needs in terms of addressing funded activities. The donor noted improvements in narrative reporting since the mid-term evaluation, in timeliness and in responsiveness to country activity logframes. Reporting is not comprehensive – it is not possible from Project reports alone to understand all of the work of the Project, issues encountered in delivering Project activities, variations in approach to improve activities and how this work contributes to GLOU40/ GPML results.

PARTNERSHIPS AND COOPERATION

There is no greater area of support for the work of the Project than in discussions during field enquiry on the development of partnerships and of cooperation. It is a singularly significant area of strong outcome from GLOU40 in the Mekong region. As well as UNODC personnel and national AML/ CMT counterparts, the evaluator interviewed representatives of ARIN-AP, APG, the Australian Federal Police, the Asia Region Law Enforcement Management Program (ARLEMP), the Border Control Agency Management Programme (BCAMP), the Embassy of the UK in Lao PDR and representatives of US Government agencies to get a complete picture of partnership and cooperation approaches and results. The feedback was substantive, and strongly positive as to the role played by the mentor in the development of strong and effective cooperation and strong and effective partnerships. There is much discussion in development assistance about developing synergies with similar initiatives, cooperation between initiatives and minimising duplication. From feedback provided during field work, it is clear that the work of the Project provides a range of specific examples of cooperation that demonstrates value being added for each contributing organisation to a cooperative effort.

National counterparts spoke positively of the role the Project plays in developing specific cooperation at the national level; cooperation that includes engagement with international organisations such as APG, UNDP, the Australian Government, the EU, the World Trade Organisation, the IMF and the World Bank, as well as cooperation with national agencies, such as between FIUs, Government

Inspectorates, relevant national committees, Ministries, prosecution offices, Courts, Customs Directorates or Departments and National Banks.

It was noted during field enquiry that the Project plays a specific coordination role with donors in the region, and indeed other actors note that they get feedback/ inputs from the Project prior to planning and implementing programmes. They noted the complementarity of skills, as well as the mentor's/ Project's central role in communications related to AML/ CMT across the Mekong region. Further, other donors and actors noted that as well as the lessening of duplication, all parties benefited from getting greater outputs from their respective budgets, while at the same time bringing additional value – certain agencies have links to people with knowledge and skills that may not be known or available to other agencies, but who become available through these collaborative processes, including specialist AML advisors and training providers.

Examples of partnership/ cooperation include:

- A very close relationship with APG that contributes to both APG and Project outcomes in the focus countries and a more effective set of outcomes in terms of FATF for these countries.
- A very close collaboration with ARLEMP and BCAMP that contributes to a non-duplication of training efforts and improved capacity-building outcomes. The programmes focus on transnational cooperation and networks in transnational crime. One focus is on financial investigations – following the money – and capacity-building is provided to Police in all of GLOU40's focus countries in the Mekong region. The Project is a key contributor to this programme, particularly in terms of the provision of training/ capacity-building in processes for interdicting money flows. This participation delivers outcomes in the Mekong region for both ARLEMP and GLOU40.
- Cooperation with the Global Wildlife programme – the work of the Project on the use of financial investigation and financial flows to combat animal trafficking (and illegal logging) has been a significant contributor to this work, not least because smugglers, whether of rhino horn, humans or cash, tend to follow the same routes, and financial investigation processes can be effective in each area.
- Significant collaboration with the UK Embassy in Lao PDR that contributes to AML results beneficial for both parties in the context of their engagement with the government of Lao PDR. The collaboration was mentioned by FIU representatives from Lao PDR as contributing to their results in developing an effective AML approach.

There is also a specific and relevant development of cooperation between the participant countries, in the Mekong region, in GLOU40. This cooperation is noticeable with Customs officials, and particularly at the borders, more than in capitals. While there is no record yet of seizures, there is a greater focus on the smuggling of cash, and of cross-border cooperation in this area.

The Project has not focused on the 'One UN'. While field enquiry addressed with stakeholders specific questions related to UN coordination mechanisms and areas of policy priority, these priorities and concepts are not demonstrably relevant in Project frameworks and implementation, nor with stakeholders. Indeed, it was argued by stakeholders that the narrow focus of the Project, on money laundering, is neither relevant nor conducive to specific One UN concepts and priorities.

EFFECTIVENESS

The following discussion on effectiveness addresses each of the three GPML Outcome statements.

Outcome 1 - Member States have available improved knowledge on illicit financial flows, money-laundering and the financing of terrorism.

Within a GPML framework, one of the focus areas of work is on training and capacity building, with a view to ensuring that the legislation that is developed does not just remain on paper, but is implemented. This is where the Project spends significant time. In terms of money laundering, there are several waves of training:

- Banking institutions to recognise transactions and to advise the FIU.
- FIUs for preparation of cases for law enforcement.
- Law enforcement to work on the cases, including parallel financial investigations.
- Prosecutors, to develop necessary experience and capacity.
- Judges – bringing them up to date with laws and processes.

In the Mekong region, project processes with counterparts are at the FIU and law enforcement stages.

Improvements in knowledge and awareness are a significant focus of the Project, although as will be seen, the focus has been greater recently in Outcome 2. At the beginning of the involvement of the Project, the awareness and knowledge of money laundering in the focus countries of the Mekong region was effectively non-existent, a point made strongly by counterparts in each country. Further, the role, function and potential impact of the FATF framework was also virtually unknown. As a result, countries were at risk of ‘listing’, and indeed were ‘black’ or ‘grey’ listed through the FATF process.

A significant amount of work has been done therefore on building awareness, knowledge and skills. Workshops were undertaken in three of the four countries (with Myanmar to be included in the coming period) with Police, Customs and prosecutors. Much of this work has been done in partnership with ARLEMP (‘view your session as a critical inclusion in the curriculum’¹⁶), and partnership aspects of this are discussed above.

The evaluation addressed directly the question of awareness and knowledge with counterparts and partners, and heard clear evidence from practitioners of the value of the training to them in their work and of a realisation across the four countries of the importance of addressing FATF criteria and the significant risks to national financial systems where these criteria are not met. Counterparts expressed the value of their greater knowledge, as well as how they now see the benefit of having a robust AML/CMT process. They noted their greater knowledge of the norms and standards of FATF, and the status of and needs they have in their own laws related to FATF generally and specifically related to the

¹⁶ Organiser comment on the role of the mentor in a training programme.

national risk assessment for their country. It was noted that political will wavers, and FATF listing processes remain a key motivating factor.

The Project addressed with counterparts the countries' obligations under treaties, and the hard and soft technical skills related to these obligations. As a result, counterparts expressed that they are much more aware of their obligations, and express and demonstrate their intention to fulfill these obligations. One particular aspect is the up-skilling of police and customs officers, which is seen as vital, if not yet at a critical level of reach. In this context, efforts in training of trainers, for example with the Vietnam Police Academy, is offered as an example of leverage with significant potential value. The expressed view of stakeholders is that the Project has been instrumental in assisting these countries to getting off the IPRG list. One particular focus of training and technical assistance is FATF-related Suspicious Transaction Reports (STR). Counterparts noted improvement in the numbers of STRs following project-provided training programmes, from banks and other financial institutions, and a greater investigation of these STRs by relevant agencies. Another change mentioned is the focus on asking 'where are the dollars', and the obvious focus on this approach from officers, which is indicative of operational up-skilling and knowledge improvements. Specific mention was made of training that enables Customs officials to better understand, be aware of and deal with cash couriers.

A consistent theme in discussions is the effectiveness of the approach taken by the Project – there is a focus on development of relationships, of working closely with people, and on an ability to understand the level of knowledge of the audience and speaking to the correct level.

Outcome 2 - Member States have effective and updated AML/CFT legal frameworks, regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards.

The evaluation heard a wide range of feedback related to the contributions of the Project to legal frameworks and regulatory regimes. This assistance has been in general terms related to requirements for meeting the obligations of international treaties and specific in terms of direct assistance with legislation and penal codes. As with all other areas of the work of the Project, collaboration with other organisations is a hallmark of work here. Of particular note here is collaboration with APG, a collaboration that has added weight to the slow and growing emphasis on policy work and the contributions of the Project. The Project is giving particular focus to the current round of FATF Mutual Evaluations, which has shifted the focus to effectiveness, the beginning of which is National Risk Assessments and then the design of programmes to mitigate these risks, with effectiveness measured against these mitigation processes. (Are you carrying out investigations? Are you seizing cash that is moving across borders? Are you penalising banks who are not reporting correctly? Are you making prosecutions?)

Support and assistance have been provided in a number of areas directly relevant to this outcome area:

- Assistance with and comment on the penal code in Vietnam. Participated in legislative drafting workshops; proposed changes in the draft law, including specific clauses for the money laundering articles of the code and provided significant technical input (knowledge and understanding) to legislative personnel to familiarise them with international standards on money laundering and the FATF guidelines, as well as on what law enforcement can do to combat money laundering. The Penal Code is yet to be approved by the Government of Vietnam, although this is related to articles other than those on money laundering.
- Specific assistance to the four countries in preparations for the Mutual Evaluation process.

- Assistance with and comment on the penal code in Lao PDR.
- Comment on the money laundering law in Cambodia. As with Vietnam, there was a relevant law but with no specific offence related to money laundering. Assisted in the drafting of the relevant articles.
- Assistance with the money laundering law in Lao PDR through an embedded expert in the Bank of Lao.
- Detailed assistance in work with FIUs on STRs.
- The implementation of ‘pocket guides’, in Vietnam and soon in Customs in Cambodia, that provide officers with a quick access guide that is directly linked to a) received training and b) good/ best international practice.
- Support, including in cooperation with the US Treasury, to Myanmar, and developing an effective approach for work with the military there, given the significant role played by the military there in areas of interest to the Project.
- Provision of review reports on relevant legislation through the UNODC office in Bangkok.

Outcome 3 - Enhanced national-level coordination and regional/international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters.

Significant discussion of this Outcome is found at the Partnerships and Cooperation section above, and so the relationship with and role played in both APG and the ARLEMP and BCAMP programmes will not be further discussed here, but it is noted that they are of specific relevance in this outcome area. Further to this discussion, a number of important activities and outputs/ outcomes related to national, regional cooperation are visible from the work of the mentor. The Project was directly involved in the establishment of ARIN/AP – the Asset Recovery Interagency Network/ Asia Pacific, is still involved in provision of technical and related assistance, and as a member of the steering group.

There are aspects of the work and role of the Project noted at Outcome 1 above that also come in to discussions in Outcome 3 – these are aspects of coalition building and collaboration that are a function/ result of style of approach as much as content of delivery. A range of feedback in field enquiry noted the ‘relationship-driven’ nature of society in the four focus countries of GLOU40. This feedback also noted the effectiveness with which the Project operates in this context:

- The role the Project plays in driving and in coordinating donor collaborations was noted in field feedback. Of particular note is the assistance provided to the British Embassy in Lao PDR, although further comment was made about assistance to relevant organisations in determining the priorities and focus of the contributions of the World Bank, the Australian Government and the US Government.
- Effectiveness in the relationship between the Project and the Lao PDR FIU is noted as a contributing factor in a change within Lao PDR towards real effectiveness on the part of the FIU. Further, this relationship has also assisted in developing a collaboration between Lao PDR and the Embassy of the UK. It is noted that there is a real anticipation now that the country can deal effectively with money laundering, with changes noted not just in the FIU but also the Bank of Lao and in law enforcement.
- Collaboration across Customs organisations – Lao PDR, Vietnam and Cambodia are mentioned – is seen as having been driven, to a certain extent, by the approach and role of the

Project, which has gone further than solely technical inputs to a greater discussion on how technical changes can be ‘sold’ at higher levels of national Customs bureaucracies.

- Creating and supporting collaboration/ partnerships between national governments/ agencies and international organisations, such as Embassies. There are specifically mentioned examples, including support at both the technical levels and political levels, and assistance at the diplomatic level to determine specific types of assistance to be provided to Ministries.
- Supporting regional cooperation by bringing related operational representatives from different entities together – specific mention has been made of the exchange of information, ideas and good practice related to asset forfeiture approaches. Counterparts mentioned specific FATF recommendations related to good relationships with neighbours, and pointed to these exchanges as being effective and fulfilling this obligation.
- Encouragement at the national level through the competition created by developing network encouragement across the region. An example was provided of an FIU representative from one country with strong advocacy skills in financial monitoring processes and solid development in their own country. These developments create motivation in FIUs in the other countries. The same process is ongoing related to the impacts of legislative developments in one country that creates motivation in neighbouring countries.

IMPACT

In looking at the longer term impact, or potential impact from the Project, it is difficult to go past the potential for impact visible in the legal frameworks that have been or are being established. This whole set of outputs, within the context of *Outcome 2 - Member States have effective and updated AML/CFT legal frameworks, regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards*, is where, finally, most impact will be felt. It cannot yet be said that this impact has happened. Firstly, while AML/ CFT legislative regimes exist now in each of the four focus countries, the related Penal Code in Vietnam is not in place, meaning in this critical country at least, the legal framework is not operational. Secondly, from the perspective of impact, the focus of this outcome statement on ‘law enforcement skills and practices’ is an area in which, as is seen above, the Project have yet to have had a significant effect. As is discussed above, the groundwork has been laid, through the focused training that has been delivered, the contributions to other training programmes such as is found in ARLEMP and BCAMP, the Training of Trainers programmes, with their potential to extend skills and knowledge to a larger group of practitioners. However, at this point only a potential for impact is visible – these are areas where the Project is on the ‘road to impact’, but where impact is not yet visible.

As is also visible in the discussion on sustainability below, it is probable that real, i.e. longer term impact, in legislation and in skills/ practice, will depend on the political will of the national leadership of the four countries – an area that is outside the direct influence of the Project. The Project contributes strongly to the necessary political discussions in relation to AML/ CMT regimes and international obligations, but actual political decisions have a significant bearing on actual directions for FIUs, law enforcement, customs officials and related officials in each country.

SUSTAINABILITY

Findings from field enquiry in relation to sustainability resonate with the discussion on impact. The two most consistent and prominent pieces of feedback are a) that likely sustainability of outcomes is not strong currently and b) the key to sustainability is political will, an area where some doubts exist and where influences of the Project are much less significant than with practitioners. Having said this, there is a strongly expressed view in ownership of Project objectives, although again this is most visible and most strong at the level of practitioner (FIU, Customs in particular). On the one hand, a number of specific examples of sustainability are noted:

- The ongoing Training of Trainer processes within Police/ Law Academies that allows for changes in practice to be embedded in national law enforcement training curriculums.
- The implementation of the ‘pocket guides’ mentioned above.
- Stated, and demonstrable ownership of changes – for example the growth in size of the FIU in Lao PDR represents a national commitment to embedding the FIU role.
- The new AML legislation, and the new Penal Codes where required.

Expressions of uncertainty about sustainability are focused on a number of areas:

- During field work, doubts were expressed in more than one country as to the political commitment to fulfilling FATF obligations. This concern is offset by the acknowledged significance to the countries in question of the impact on their economies and international status of being placed on the ICRG list.
- Doubts as to the breadth and depth of knowledge and skills in relevant national counterpart representatives. There is a widely expressed view, among national and international counterparts, that the role and function of the mentor will be required for a further 4-5 years.
- A related doubt was expressed as to the absorption capacity in relevant counterpart institutions in the short-term - that support will need to be ongoing while skilling up takes place. This is true across the full range of institutions with a large number of practitioners (border customs agents, law enforcement, prosecutors and the judiciary), as it is not clear to national representatives in any of the four partner countries, nor to the Project, what exact processes are needed, and can be implemented, that will ensure the necessary skills and knowledge are present and in use across these relevant institutions.

HUMAN RIGHTS AND GENDER

There is no mention of gender in the GLOU40 Project document. The only mentions of gender in the Project revision document are in ToR for employees (job profiles) and a reference to including gender in evaluation frameworks. Country logframes make no reference to gender. Project reporting does not reference gender. The mid-term evaluation document makes no reference to gender, except in requiring a gender balanced approach in selection of the evaluation team.

There is no reference to human rights in the GLOU40 project document. The one mention of human rights in the Project revision document is a reference to include human rights in evaluation frameworks. Country logframes make no reference to human rights. Project reporting does not reference human rights. The mid-term evaluation document considers some aspects of human rights mainstreaming in Project design and implementation.

The Project demonstrates the characteristics of ‘low evaluability’ per Table 1.1. Determining the evaluability of the human rights and gender equality dimensions of an intervention in the evaluation of UNEG’s human rights and gender equality guidelines.¹⁷ Specifically,

- As described above, intervention theory failed to consider human rights and gender equality dimensions in its design, implementation and monitoring.
- Stakeholder, human rights and gender equality analyses were not conducted.
- Data on human rights and gender equality are not available.
- As described above, progress reports for the intervention do not address human rights and gender equality issues.
- Context (political, institutional, cultural, etc.) where the intervention is inserted is not conducive to the advancement of human rights and gender equality. There is a consistently expressed view that the Project per se does not lend itself to a specific gender mainstreaming focus. According to the *UNODC Guidance Note on Gender Mainstreaming*¹⁸, ‘gender mainstreaming is simply looking at the human implications of any activity, highlighting the differences between women and men and thus the potential differential impacts and designing the activity to ensure that both men and women will benefit equally. It is a strategy to achieve gender equality. It does not view gender as a “separate question”, but explicitly integrates a gender dimension into all activities. Gender mainstreaming implies that the impact of all policies and programmes on women and men should be considered at every stage of the programming cycle—from planning to implementation and evaluation.’ The Project has not applied this principle at any level. Feedback from field enquiry notes that the reasons for this approach are -
 - The narrow thematic focus on money laundering.
 - The narrow focus of capacity building on AML processes, focused legislative and policy/ procedural changes.
 - The narrow focus on investigative processes and prosecution related to money laundering.

In this focused context, the Project has worked to ensure, to the extent possible, a balance of gender participation in training programmes, but has not had a specific gender focus beyond this.

In relation to human rights more generally, the mentor has focused on specific aspects in this area. A focus on human rights is very relevant to the work of the Project. As significant work is done with law enforcement, ensuring basic human rights principles are maintained and implemented in the work of Customs and Police Officers when addressing potential money laundering activities, is a key concern

¹⁷ 2011. Integrating Human Rights and Gender Equality in Evaluation -- Towards UNEG Guidance. United Nations Evaluation Group.

¹⁸ 2013. Guidance Note for UNODC Staff. Gender Mainstreaming in the Work of UNODC.

and focus of the mentor. One aspect of this is the right to privacy, in terms specifically of the need for law enforcement to implement the principle of proportionality in the use of their very significant powers they have in this area in terms of the human right to privacy. A second aspect is to address the question of the rights of suspects during investigations/ interrogations. The focus in these areas during training programmes is noted by the mentor, and was also noted by counterparts as being a clear and present focus during training programmes.

III. CONCLUSIONS

DESIGN

The single most important design change that is required is ensuring the logical frameworks of each country are correlated clearly with the GPML logical framework so that the activities and outputs in any given country can be clearly seen to contribute to GPML outputs and outcomes. Currently, as noted above in the Findings section, the Project lacks strategic coherence with GPML more widely, given the existence of country-based logical frameworks that are not specifically and clearly aligned with the GPML logical framework. The findings of the mid-term evaluation, while visible in some aspects of Project design and implementation, did not have a significant impact on the Project, and how it functions.

RELEVANCE

The Project demonstrates a high level of relevance in a number of key areas. There is a clear and demonstrated relevance to the strategy and policy frameworks of the governments of the four focus countries of the Mekong region, and particularly to the financial institutions of these countries. The Financial Investigation Units of the countries particularly demonstrate ownership of AML/ CMT approaches and requirements. The Project has clear relevance to the Sustainable Development Goals – specifically 16.4, and has a clear fit with a range of UN thematic areas and national, regional and global strategies.

EFFICIENCY

Project reporting is an area where improvements are needed, and while not a component of this evaluation, there are implications that improvements are also required in GPML as a whole. It is not immediately clear to someone not directly involved in the Project exactly how GLOU40 activities in the Mekong region contribute to defined GPML outcomes/ objectives, and why. Digging is required into documents, and conversations with stakeholders to gain a full understanding of the activities and results of the Project. All aspects of the Project, from funding processes through to reporting would benefit from a better telling of the ‘story’ of the Project, both in terms of result strategy and outputs/ outcomes. It is not possible to fully understand from Project reporting what has been achieved, in terms of GLOU40 or overall GPML results compared to plans/ funded activities. One component of this is ensuring that reporting on GLOU40 in the Mekong region is always comprehensive against the programmed activities, outputs and outcomes of the GPML strategic (logical/ results) framework. It is extremely important that an external reader of published annual reports be able, from the reading, to understand what has been done in each project result area (outputs and outcomes), and to see how each of these activities has contributed to overall Project results. This then also provides a clear framework for discussion of issues/ problems encountered in achieving results from these activities, and the modifications that were made to improve results.

The ongoing negative impact of the implementation of the Umoja system on the Project cannot be underestimated, and needs to be addressed. Administrative/ financial systems are,

in principle, support systems to allow implementation to happen. In the current circumstance the finance system not only impacts negatively on Project administration, slowing payments to suppliers and technical experts, it also impacts negatively on Project implementation.

PARTNERSHIPS AND COOPERATION

The Project demonstrates a significant focus on, contributions to and effective outcomes in the areas of collaboration, cooperation and partnership. The partnership focus of the Project adds significant value to the Project and to the work of partners. It is specifically noted that this partnership approach includes a range of national, regional and global organisations and initiatives, and includes partnership with the Project and the development of collaboration, directly, between these partners. Regarding collaboration across technically focused agencies, within countries and regionally, the Project also plays a significant role in driving and coordinating donor efforts in the region, including the provision of advice and comment on the planning and implementation of programmes.

EFFECTIVENESS

The Project is providing strong outputs across all four countries of the Mekong region and is strongly contributing to the intended outcomes of GPML. These outputs are apparent in all three defined outcome areas of GPML.

- Countries are more aware of the concept and reality of money laundering, as well as their obligation in dealing with money laundering according to international treaties to which they are signatories.
- Countries have better defined national legislation and penal codes related to money laundering (although there remain roadblocks to actual prosecutions, such as the lack of finalisation yet of the penal code in Vietnam).
- Countries have a deeper knowledge, particularly among practitioners in the Police and Customs, as to what defines money laundering, how money laundering can be observed in specific interventions at borders, how money laundering can be observed in investigative processes and how these investigative processes can be used in prosecutions.
- Countries have improved outputs in terms of STRs and the interdiction of money flows at borders.
- Countries demonstrate better cooperation nationally, between each other and with international organisations that contribute to more effective national and international practice in the interruption and prosecution of money laundering activities.
- Countries demonstrate a focus on upcoming Mutual Evaluations, and their obligations in meeting the requirements of these processes. They do, however, express anxieties about actually successfully passing through the assessments, and seek further assistance from the Project to address existing weaknesses.

IMPACT

There is scope for impact from the Project but it is not yet visible. Impact is most likely to come from practitioners, through embedding of changes in practice as skilling up is extended

to larger groups of police and customs officers. It is here, with these officers, and with the public servants of the FIUs, that good practice is most likely to be demonstrated in the longer term, and where there are the most notable demonstrations of ownership of the approaches and priorities of the Project, and of AML/ CMT more generally. It is also important to mention legislation, as it is here that there is the most potential for longer term impact.

SUSTAINABILITY

As with impact, sustainability is most likely to come from practitioners, and changes to practice. Good/ best practice is most likely to be demonstrated with these groups in the longer term, and ownership of the approaches and priorities of AML/ CMT are most visible here. As is noted in the Findings section, while real sustainability will be found with practitioners, political will, and impetus from political leadership to ensure each country fulfils its FATF and related obligations, remains a critical factor in longer term change.

HUMAN RIGHTS AND GENDER

Project design documentation makes no specific reference to human rights or gender equality, although the Project itself does give particular attention to certain specific and key human rights in the delivery of its activities and training programmes. These include the right to privacy and the principle of proportionality when national officials (police in particular) make use of their legislated powers in dealing with suspected perpetrators of money laundering crimes. There is no focus on gender in Project activities beyond ensuring, to the extent possible, a balance in participation in training initiatives. There is no mention of gender in Project design documents, including logical frameworks, nor is there any mention in Project reporting. The evaluation Terms of Reference provide specific guidelines for addressing gender issues within the evaluation.

IV. RECOMMENDATIONS

A Continued Focus On Assistance With Mutual Evaluations

There are a number of areas visible throughout the report where one or all of the partner countries have discussed the significant value they have gained from the assistance provided by the Project to their compliance work with FATF. Further, each country has noted their understanding of the importance of upcoming Mutual Evaluations and their need for assistance in preparations for the assessment process. In some cases specific requests were put to the evaluator related to this potential assistance. These specific requests, which include focused workshops and direct technical assistance have not been itemised or addressed in the report – it is more appropriate that the Project have focused conversations with counterparts related to this potential assistance. **It is recommended** that the Project continues to formally address with each counterpart country the specific needs they have in preparation for their Mutual Evaluations and, together with the countries, prepare a programme of assistance. (GLOU40 in the Mekong region.)

Financial Investigations Focus

One area of somewhat more recent focus by the mentor that was mentioned throughout the evaluation field work, and is commented on in the Findings and Conclusions sections, is financial investigations, and the upskilling of relevant counterpart staff in this upcoming focus area of work. **It is recommended** that the Project strengthen their focus on financial investigations, across all four countries, and contribute to the extent possible to the development of the ARLEMP module in financial investigations (both its development and its delivery). (GLOU40 in the Mekong region.)

Logical Frameworks

As is discussed in the Findings and Conclusions sections, current country logical frameworks do not provide any clear connection to the logical thinking, planning and structuring of the work of GPML globally – there is no clear correlation between the specific activities of the Project in counterpart countries and the work of GPML more widely. In reality, this correlation exists, and the work of the Project sits well within the framework of GPML, as is seen in the Findings section, but this is not visible in the logical frameworks. **It is recommended** that going forward, beginning with any new funding arrangement, the correlation between the design and work of the Project and GPML globally be clearly visible in the logical framework of GPML globally and GLOU40 in the Mekong region. Where it is required by the donor that there be a clearly defined activity logical framework for each country, these can and need to be developed within the overall logical framework of GPML. This will ensure the strategic alignment with GPML and will enable a significantly better framework for reporting (on GLOU40 and on GLOU40s contributions to GPML overall). (UNODC Vienna – GPML Project Management, GLOU40 in the Mekong region.)

Reporting

In line with the above discussion, and as noted in the Findings section, Project reporting does not contribute to straightforward access to and a facilitated understanding of all Project

activities and outputs/ outcomes, and particularly does not do this in the overall context of the Project (and GPML) design. Currently, Project reporting does not provide an effective narrative for the Project – the *story* of the Project, including the work it does, the issues it encounters, its successes in the Mekong region and its contributions to GPML more generally is not readily available to an uninitiated reader. **It is recommended** that Project reporting address all components of the GPML/ Project logical framework. Specifically, it is important that Project contributions to defined outputs, outcomes and the overall objective be analysed/ described. It is important that the activities of the Project for a reporting period be reported on within this same framework, so that it is clear, strategically, why activities are being undertaken and what contribution they are making to outcomes. Where there are no activities related to a specific outcome area, this should be made clear, together with an analysis of why. Where there have been issues in the development, design, implementation of activities, these should also be made clear, as should revisions to the approach, where these revisions are made to improve activity results or to more strongly contribute to Project/ GPML outcomes. (UNODC Vienna – GPML Project Management, GLOU40 in the Mekong region.)

Improvements In Administrative Support Systems

The ongoing negative impact of the Umoja implementation needs to be addressed in Bangkok and Vienna. As is discussed in detail in the Findings and Conclusions sections above, the Umoja implementation not only does not assist with Project implementation, but indeed detracts from Project activities and outcomes. **It is recommended** that UNODC urgently addresses the key bottlenecks in financial and administrative systems to ensure that a) project activities are not hindered by administrative constraints, b) suppliers are not disadvantaged by late payments and c) counterparts are not dis-incentivised in their participation in events by administrative and financial requirements. (UNODC Senior Management/ GPML Programme Management.)

Location Of The Mentor

The question of location of the mentor was raised specifically during the mid-term evaluation, where it was recommended that consideration be given to moving the mentor permanently to Lao PDR. This recommendation was considered by GPML and it was decided that such a move was not necessary or, at that moment desirable. This discussion again came up during this current evaluation, in discussing follow-up to the mid-term recommendations. It was clear in these discussions that there are a number of benefits to be gained from a continued location in Hanoi, as well as benefits from re-locating to Vientiane. **It is recommended** that this conversation again be held between GPML in Vienna and the GLOU40 Project, and that consideration be given to inclusion of key international and local partners. No specific recommendation on the location of the mentor is given here, simply that a detailed internal discussion take place that canvasses the pros and cons of location, and impact on effectiveness, and that a decision be made on location for the next period of the Project. (UNODC Vienna – GPML Project Management, GLOU40 in the Mekong region.)

Partnerships

As is discussed in the Findings section, the partnership work of the Project is a significantly positive aspect of Project focus and delivery. **It is recommended** that the Project continue with the strong focus on partnership development and implementation, between counterparts, between counterparts and international organisations/ agencies and between the Project and international organisations/ agencies. The intent of this recommendation is to provide significant support and impetus to the current partnership work, as it is seen as being of

particular importance to the current successful Project outcomes, while adding value to the work and outcomes of a range of related initiatives. (GLOU40 in the Mekong region.)

Human Rights and Gender Mainstreaming

As is noted in the Findings section, there is no addressing in any Project documentation of gender mainstreaming nor any focus on human rights. The Project would benefit from focus in these areas, to ensure, notwithstanding the technical nature of activities and focus, that the human implications of the Project, and the potential differential impacts of the Project benefit both men and women equally, and that the Project specifically addresses relevant human rights priorities. **It is recommended** that the Project, and GPML at the global level, undertake a gender analysis of the focus and priorities of GPML/ GLOU40, with a view to ensuring a) a specific focus on gender mainstreaming in Project thinking, planning, implementation and reporting, b) a specific human rights focus in Project planning and c) that all activities and intended results of the Project give consideration to the impact of Project activities and results on human rights generally, and specifically on the rights of men and women.

V. LESSONS LEARNED AND BEST PRACTICES

The successful outcomes that have come by way of the allowed flexibility in specific Project activities is viewed as a lesson that has been learned as to what makes a mentoring approach successful. A range of discussion was heard about how allowing the mentor to shift focus to areas of priority and need, as they become visible/ apparent, is a more effective approach in dealing with the requirements of AML/ CMT in the Mekong region. This is indeed an appropriate and apparently successful approach, so long as the work of the mentor remains defined within the overall GPML results framework, and is reported on in this way. It would not be appropriate for activities to move in any direction, without guidance or a strategy, but it the flexibility of focus and approach allows a nimbleness and responsiveness that in the context of the Project is both relevant and effective.

The effectiveness of the close relationships that have been developed with APG, ARLEMP and BCAMP can be seen as a lesson learned, notwithstanding that this fits clearly within the intent and design of Outcome 3 - Enhanced national-level coordination and regional/international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters. The lesson that has been learned is also discussed in the Findings section above – international technical assistance projects invariably discuss in their design documentation the need to find and develop synergies with related initiatives in order to improve effectiveness and to avoid duplication. The Project demonstrates in a most effective way the truth of this approach – there are clear and demonstrable benefits for each party to these partnerships, and these benefits are noted by all sides.

A key to future work is exposure to money laundering as a crime/ criminal activity. There is significant experience with corruption and human trafficking in national agencies, but much less knowledge and understanding of following the money – much less understanding and knowledge of conducting financial investigations and the importance of this approach. The Project's counterparts find this deeply interesting, and it is an area of strong relevance to future national initiatives against money laundering. One particular area related to this is the newer work now being done with animal trafficking, which can be enhanced by expanding the processes to include a process of following the money, and to include this in other areas such as forestry crime and human trafficking. This can add value as well to the work and outputs of all related AML/ CMT processes undertaken by countries who are counterparts with the Project:

- They will discover more evidence to support work on the original crime.
- They will discover the identities of members of a wider criminal network.
- They will identify the proceeds/ profits from the crime, which will allow them, as Law Enforcement, to seize and to confiscate these proceeds.

There is a further by-product, in that addressing these areas assists the counterpart country to comply with FATF.

One strongly discussed lesson was the critical nature of the role and importance of financial institutions. There is a clear understanding that while compliance with FATF, and actually

addressing money laundering as a crime, is a matter of legislation, penal codes and police, customs, prosecutors and the judiciary, real impact from a lack of compliance is experienced directly by financial institutions – notably national banking institutions in their dealings with their international counterparts. Therefore, including them in discussions and processes can add value to national processes in addressing AML/ CMT. There are three specific aspects of this discussion that are particularly relevant to a discussion on lessons that have been learned:

- The technology of financial investigations is transferable, and can be applied across a range of institutions and agencies.
- Analytical processes related to financial investigations are transferable, and can also be applied across a range of institutions and agencies.
- Banks, central banks in particular have high quality, trained staff with a history of working at the international level. Focusing change processes on these staff (capacity-building, changes in practice, etc) is particularly relevant to development of national, financial investigation processes in the focus countries.

ANNEX I. TERMS OF REFERENCE OF THE EVALUATION

Terms of Reference of the

Final Independent Project Evaluation of the
Activities Conducted in the Mekong Region

under the

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

2011-2016

GLOU₄₀

Mekong Region

November 2016



UNITED NATIONS

New York, 2016

CONTENTS

I. BACKGROUND AND CONTEXT

Project number:	GLOU40 – project segment in the Mekong Region
Project title:	Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) – Activities conducted in the Mekong Region
Duration:	2011-2016 (Mekong region); 01 March 2008 – 31 December 2019 (GLOU40 overall)
Location:	Mekong Region
Linkages to Country, Regional and Thematic Programmes:	<p><u>Country Programmes:</u> Links to Sub programme 2: Outcome 4 of the Laos Country Programme. Links to Sub programme 2: Outcome 2 of the Viet Nam Country Programme.</p> <p><u>Regional Programmes:</u> Links to Sub programme 2: Outcome 2.3 of the Regional Programme on East Asia and the Pacific. Links to Sub programme 1: Outcome 4 of the South Asia Regional Programme.</p> <p><u>Thematic Programmes:</u> Thematic Programme on Action against Transnational Organised Crime and Illicit Trafficking, including Drug Trafficking.</p>
Executing Agency:	UNODC/Associate Agency: UNOPS (United Nations Office for Project Services)
Partner Organizations:	-
Total Overall Budget	US\$ 55,900,334
Donors:	Germany, Switzerland, USA and the World Bank.
Project Manager/Coordinator:	Oleksiy Feshchenko
Type and time frame of evaluation: (Independent Project Evaluation/In-depth Evaluation/mid-term/final)	Final Independent Project evaluation of the activities in the Mekong Region
Timeframe of the project covered by the evaluation:	2014 (since the end of the data collection of the previous evaluation)-2016
Geographical coverage of the evaluation:	Cambodia, Lao PDR, Myanmar and Viet Nam
Budget for this evaluation:	US\$ 41,772.20
Type and year of past evaluations (if any):	Mid-term independent project valuation, conducted in 2014 In-Depth Evaluation of the whole programme (GLOU40), conducted in 2010/2011
Core Learning Partners ¹⁹ (entities):	State Secretariat for Economic Affairs SECO; Counter Terrorism Department; Anti-Smuggling Department, Customs General; UK Department for International Development

¹⁹ The CLPs are the main stakeholders, i.e. a limited number of those deemed as particularly relevant to be involved throughout the evaluation process, i.e. in reviewing and commenting on the TOR and the evaluation questions, reviewing and commenting on the draft evaluation report, as well as facilitating the dissemination and application of the results and other follow-up action. Stakeholders include all those to be invited to participate in the interviews and surveys, including the CLPs.

Project overview and historical context

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

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

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

In August 2011, GPML and Switzerland entered into a funding agreement to finance the work of GPML mentor in the Mekong region. The initial funding agreement was from 2011 to 2013, but it was later extended to December 2016. In addition to Swiss pledge for USD 1,617,000 over six years, the World Bank has pledged USD 288,900 over two years for GPML in the Mekong region. The GPML mentor, covers four Mekong countries viz., Cambodia, Lao PDR, Myanmar and Viet Nam. The mentor works directly with the national authorities for providing AML/CFT advice, training and technical assistance to support the establishment, development and implementation of AML/CFT regimes and raising awareness in government agencies, the legislature, the private sector, and the public at large, as appropriate.

The funding agreement with Switzerland generated a mid-term independent project evaluation covering the period from August 2011 to December 2013. Overall, the evaluation found adequate evidence on achievement of outcomes such as enactment of legislation, increased knowledge and awareness of implementing agencies, and increased application of new knowledge by the beneficiaries, it found only early indications on achievement of broader objectives viz., reduction of corruption and money-laundering in the beneficiary countries. Nine recommendations were made by the evaluation, all addressed to GPML (for further details on the recommendations please see Section III).

Switzerland has requested a Final Evaluation of the project covering the period from 2011 to 2016.

Since the inception of the new project GLOU40 in March 2008, GPML has undergone several project revisions, only two of which were substantive and resulted in an extended duration of the programme (1 April 2008 - 31 December 2015 and 01 April 2008 – 31 December 2019 respectively). In addition, the revised document refers to staffing and budget changes in connection with the Implementation Support Section (ISS) of the Organized Crime and Illicit Trafficking Branch (OCB). In 2012, a project revision was undertaken to create an Adviser position with a focus on AML/CFT capacity building for law enforcement agencies and to add Myanmar to the list of countries covered by the Adviser. The previously advertised position came to an end and a new position was created.

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

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

The project contributes to:

Result area 1.2 - International cooperation in criminal justice matters

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

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

Main challenges during implementation

Main challenges in Viet Nam have been a lack of political will to actively initiate change and the lack of a workable money laundering offence in the Penal Code. The Penal Code issue has been resolved to a point in that in the 2015/16 revision of both the Penal Code and Criminal Code the mentor was able to draft a new money laundering offence. Unfortunately, although the Penal Code was scheduled to be enacted on the 1 July 2016 this didn't happen and at the time of writing (November 2016) there is no fixed date for when the Penal Code will be passed. Indications are that it will be in the 1st quarter of 2017.

Main challenge in Myanmar is communication with the counterparts not responding to email requests for meetings and visits as efficiently as they could. This has caused delays in project implementation. Things have improved to a certain extent during the last half of 2016.

Cambodia and Lao PDR- No issues.

Overall though, the single most difficult challenge has been the impact of UMOJA (the new financial management system of the UN Secretariat) on working practices.

Project documents and revisions of the original project document

Project document	Year	Please provide general information regarding the original project document.
	2008	<p>As a successor to the Global Programme against Money-Laundering (GPML) which was established in 1997 under the then United Nations Drug Control Programme (UNDCP) this new project GLO/U40 entitled: Global Programme against Money-Laundering, Proceeds of Crime and the Financing of Terrorism encourages anti-money-laundering and countering the financing of terrorism policy development, raises public awareness about the cross-cutting aspects of money-laundering and the financing of terrorism, contributes to the strengthening of governance measures and anti-corruption policies, and acts as a centre of expertise of anti-money-laundering and, jointly with the Terrorism Prevention Branch, countering the financing of terrorism related matters. The Programme is pivotal to UNODC's mandate to prevent drug offences and other crimes in that it offers specialized services and tools to help Governments deal with an important component of action against crime with a view to removing the profits of such crime and providing a disincentive for committing them.</p> <p>This new project will focus on these objectives and functions as an ongoing 'rolling' project, with a biennial budget and will have a drugs and a crime component.</p> <p>The project will add to financial integrity and transparency with a view to contributing to the development of sound economic and financial environments in UN Member States, a prerequisite for generating long-term sustainable development and investment.</p>

Project revision (please add further rows as needed)	Year	Reason & purpose	Change in (please check)
1	2012	<p>This Project Revision is being done to reflect the change in project management and structures and to increase the overall budget and the total approved budget to programme the pledges received after the last revision.</p> <p>The following changes are being introduced by this revision:</p> <ul style="list-style-type: none"> - Contribute 2.5 months salary cost of the Staff Assistant of the Chief of the Implementation Support Section (ISS) of the Organized Crime and Illicit Trafficking Branch (OCB). - One P-4 Adviser position is being relocated from Namibia to Pretoria to provide capacity building to the ARINSA Secretariat and to deliver technical assistance to confiscation agencies in Member States in Southern Africa. - Two P-4 Regional Adviser positions (Adviser in Dakar, Senegal and Adviser, Hanoi, Viet Nam) are being created with a focus on AML/CFT capacity building for law enforcement agencies. - The total approved budget is being increased to US\$ 15,214,846 in order to allow GPML to programme the additional pledges received since the last revision in September 2011. 	Budget Timeframe Logframe
2	2013	<p>This Project Revision is being done to create a new logframe for GPML and to modify titles on the staffing table per the request from HRMS.</p> <p>No further changes to the Project at this time.</p>	Budget Timeframe Logframe

Main objectives and outcomes

Project Objective:

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

Outcome 1

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

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

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

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

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

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

Outcome 2

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

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

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

Outcome 3

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

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

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

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

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

Contribution to UNODC's country, regional or thematic programme

The Programme contributes to the following country and regional programmes:

Country Programmes:

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

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

Regional Programmes:

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

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

The Programme contributes to the following thematic programmes:

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

Linkage to UNODC strategy context and to Sustainable Development Goals

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

In line with the strategic framework, UNODC has also adopted a Thematic Programme on Action Against Transnational Organized Crime and Illicit Trafficking, Including Drug Trafficking that set out the strategic priorities for UNODC for the 2011-2013 period. This Thematic Programme aimed to provide a coherent and comprehensive approach to efforts to prevent and combat all forms of transnational organized crime. GLOU40 has both informed and been further developed in the framework of the Thematic Programme and, specifically, fell under Sub-Programme 2 of

the Thematic Programme: Regional and National Capacity Building and Technical Assistance. The Global Programme GLOU40 was also aligned under Sub-Programme 2 and gave practical application to the Thematic Programme, developing global solutions to critical challenges and both supporting and delivering direct technical assistance, in close consultation and coordination with the regional offices.

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

The Global Programme contributes to Sustainable Development Goal 16.4, which reads:

By 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime.

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

II. DISBURSEMENT HISTORY

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

Time period covered by the evaluation	Total Approved Budget	Expenditure	Expenditure in %
01/2011-12/2011	3,157,000	2,722,387	86%
01/2012-12/2012	3,145,900	2,844,283	90%

01/2013-12/2013	3,359,200	2,848,193	85%
01/2014-12/2014	3,620,600	3,277,330	91%
01/2015-12/2015	5,168,300	4,671,838	90%
01/2016-10/2016	6,268,400	4,400,186	70%

III. PURPOSE OF THE EVALUATION

The final evaluation has been requested by the donor, Switzerland and is guided by the UNODC Independent Evaluation Unit (IEU) in regards to quality assurance in situ and from headquarters through the provision of guidelines, formats, assistance, advice and clearance on key deliverables during the evaluation process. IEU further ensures that the GPML evaluation conforms with the United Nations Evaluation Group (UNEG) Norms and Standards. Furthermore, it will be assessed to what extent human rights aspects and gender mainstreaming have been taken into account during all phases of the programmes. The evaluation will focus on the time period since that previous mid-term evaluation in 2014 until December 2016.

Furthermore, one of the main objectives of the final evaluation is the assessment of the implementation of the mid-term recommendations and assess if project performance improved

Recommendations of the mid-term evaluation in 2014²⁰
Recommendation 1: UNODC should continue to focus on mentoring as a mechanism for delivering technical assistance (TA) on operational aspects of AML/ CFT system. That said, UNODC should also consider commissioning a specific study (in-house or external) to examine and demonstrate comparative cost-benefit analysis of various TA delivery mechanisms on AML/CFT.
Recommendation 2: Data collection on use of training and mentoring needs to be made more systematic and routine. The mentor must send out a follow up survey 6 months after completion of training to collect data on its use.
Recommendation 3: GPML should develop mechanisms for consultation with donors and partners organizations on results framework and annual strategic priorities on an on-going basis.
Recommendation 4: GPML should promote, establish and nurture local and regional networks to facilitate greater interaction among direct and indirect beneficiaries to have a greater impact on AML/CFT situation in the beneficiary countries.
Recommendation 5: UNODC/ GPML needs to develop better reporting systems to report results information for continued support from donor and partner organizations.
Recommendation 6: UNODC/ GPML should consider moving the mentor to a different country in the Mekong region once it is determined that Vietnam is on a sustainable path
Recommendation 7: GPML should provide greater incentives for increased responsiveness to partners by inviting appropriate colleagues from partner organizations to provide inputs into mentor's annual performance reports.
Recommendation 8: UNODC/ GPML needs to work with FRMS and donors to develop financial reports that provide granular information required by the donors.

²⁰ The mid-term evaluation report is available online on the IEU website: http://www.unodc.org/documents/evaluation/Independent_Project_Evaluations/2014/GLOU40_Mekong_Region_Independent_Project_Evaluation_Report_June_2014.pdf

Recommendation 9: UNODC should collaborate with the World Bank and other partner organizations to undertake national risk assessments on a priority basis.
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The request for this final evaluation was embodied in the original funding agreement and in its subsequent amendment. The donor requested a final evaluation to be conducted at the end of 2016.

The evaluation is being conducted to provide accountability to the donor by determining whether the project objectives were met and if resources were wisely utilized. Another reason is also to identify areas of improvement, if needed and to clarify any problems and or challenges encountered.

The ultimate goal of the evaluation is to set priorities and goals, to suggest new strategic direction and to allow the donor to utilise the evaluation outcomes to consider future funding. The Programme conducted detailed discussions with the donor to enquire if future re-funding will be possible. The representative from Switzerland confirmed that the evaluation outcomes and findings will be used to leverage future funding from Senior government officials in Switzerland.

The main evaluation users will be the GPML Programme Manager, the GPML AML/CFT Adviser for the Mekong Region, Cambodia, Lao PDR, Myanmar, Viet Nam the Government of Switzerland. Other stakeholders, who have been partners in the implementation of the programme activities, including non- governmental organizations and private sector entities, will also be consulted as key informants during the evaluation.

IV. SCOPE OF THE EVALUATION

Unit of analysis (full project/programme/ parts of the project/programme; etc.)	Part of the Programme (Mekong region)
Time period of the project/programme covered by the evaluation	January 2014 – December 2016/Mekong region
Geographical coverage of the evaluation	Mekong region, covering Cambodia, Lao PDR, Myanmar and in Viet Nam.

V. KEY EVALUATION QUESTIONS

Evaluation Criteria

The evaluation will be conducted based on the following DAC criteria: relevance, efficiency, effectiveness, impact and sustainability, as well as partnerships and cooperation, gender and human rights and lesson learned. The questions will be further refined by the Evaluation Team. <u>All the below questions are referring to the Mekong segment of GLOU40 and not to the overall programme.</u>

Relevance

Relevance is the extent to which the aid activity is suited to the priorities and policies of the target group, recipient and donor.

1. To what extent did the implementation of the recommendations of the mid-term evaluation lead to improved design and/or implementation of the programme?
2. To what extent are the outputs, outcomes and objectives of this programme relevant to implementing the Sustainable Development Goals as well as the overarching UNODC strategy?
3. How relevant is the AML/CFT agenda for the beneficiary Member States and how did the programme adapt to changing strategies in the region?
Efficiency
Efficiency measures the outputs - qualitative and quantitative - in relation to the inputs.
1. To what extent have the resources/inputs (funds, expertise, staff time, etc) been converted to outputs in a timely and cost-effective manner?
2. What measures have been taken during the planning and implementation of the activities to ensure that resources are efficiently used?
3. Was there anything in the budget and administrative arrangements that impeded project delivery?
Effectiveness
Effectiveness is a measure of the extent to which an aid activity attains its objectives.
1. To what extent did the programme implement recommendations of relevant previous evaluation(s) and to what extent did it improve the effectiveness of the programme?
2. To what extent has progress been made towards achieving the objectives and outcomes of the project as stated in detailed logframe?
3. What are the reasons for the achievement and non-achievement of the programme objectives and outcomes?
Impact
<i>Impact is the positive and negative changes produced by a development intervention, directly or indirectly, intended or unintended.</i>
1. To what extent did the programme or is likely to contribute to the Sustainable Development Goals?
2. To what extent has the activities contributed, or is likely to contribute, to long term impact and/or intermediate results (directly or indirectly, intended or unintended) for its beneficiaries, target groups, communities involved, and institutions related to the programme?
Sustainability
Sustainability is concerned with measuring whether the benefits of an activity are likely to continue after donor funding has been withdrawn.
1. To what extent are the results (outcomes and impact) generated through the activities likely to be sustained in the countries after the funding has been depleted?
2. To what extent have the programme stakeholders and beneficiaries taken ownership of the objectives to be achieved by the project? Are they committed to continue working towards these objectives after the end of the UNODC project activities?
3. To what extent is programme stakeholders' and beneficiaries' engagement likely to continue, be scaled up, replicated or institutionalized after external funding ceases?
Partnerships and cooperation
The evaluation assesses the partnerships and cooperation established during the project/ programme as well as their functioning and value.
1. To what extent has GPML effectively leveraged joint initiative opportunities with other United Nations entities (including UNODC Field Offices) and other anti-money laundering bodies throughout the world?
2. To what extent does GPML's collaboration with partner organizations create a value-added synergy which avoids duplication of efforts?
3. What lessons can be drawn from GPML's engagement with target beneficiaries such as legislators, prosecutors, FIU analysts and law enforcement officials during the local capacity building joint collaborations?
Human rights
The evaluation needs to assess the mainstreaming of human rights aspects throughout the project/ programme.
1. To what extent have human rights principles been integrated into the delivery of technical assistance under the project?
2. To what extent has the Regional Programme supported the project as a means to introduce human rights (in L.E) related standards in the sub-region?

Gender
The evaluation needs to assess the mainstreaming of gender aspects throughout the project/ programme.
1. What measures have been taken during planning and implementation to ensure that gender aspects were mainstreamed?
2. What measures have been taken to ensure the inclusion of men, women and marginalised groups throughout the activities conducted in the Mekong region?
Lessons learned and best practices
Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.
1. What lessons can be learned from GPML’s mentoring initiative and other implementation modalities in order to improve performance, results and effectiveness in the future?
2. What good practices in general emerged from the implementation of this project that can be replicated in other programmes and projects?
3. What is considered to be the most effective aspect of the mentor program on AML/CFT progress?

VI. EVALUATION METHODOLOGY

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

According to the UNODC Evaluation Policy, Handbook and Guidelines and the United Nations Evaluation Group (UNEG) Norms and Standards, the integration of Human Rights & Gender Equality dimensions in the evaluation process will enable the UN system to better learn lessons, hold key stakeholders accountable for results, and in turn improve policies and programming, which will contribute to the realization of HR & GE and meeting the Strategic Development Goals (SDGs) and other UN mandates. Regardless of the size of the intervention, an evaluation design which applies a mixed-method approach will be the most appropriate to generate an accurate and comprehensive picture of how HR & GE are integrated into an evaluation.

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

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

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

The main elements of method will include:

- Preliminary desk review of all relevant project documentation, (Annex II), as provided by the Programme Manager;
- Preparation and submission of an Inception report (containing preliminary findings of the desk review, refined evaluation questions, data collection instruments, sampling strategy, limitations to the evaluation, and timetable) to IEU for review and clearance before any field mission may take place;
- Interviews (face-to-face or by telephone), with key project stakeholders and beneficiaries, both individually and (as appropriate) in small groups/focus groups, as well as using

surveys, questionnaires or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation; including field missions to all countries in the Mekong region.

- Analysis of all available information;
- Preparation of the draft evaluation report (based on Guidelines for Evaluation Report and Template Report to be found on the IEU website <http://www.unodc.org/unodc/en/evaluation/index.html>). The evaluators submit the draft report first to IEU for quality control. IEU shares the draft report, once cleared, with Project Managers for the review of factual errors or omissions and the evaluators consider the comments. Subsequently IEU shares the final draft report with all Core Learning Partners for comments on factual errors.
- Preparation of the final evaluation report. The evaluators incorporate the necessary and requested changes and finalizes the evaluation report; following feedback from IEU, the Project Manager and CLPs for IEU clearance;
- Presentation of final evaluation report with its findings and recommendations to the target audience, stakeholders etc. at a meeting at UNODC Headquarters.
- In conducting the evaluation, the UNODC and the UNEG Evaluation Norms and Standards are to be taken into account. All tools, norms and templates to be mandatorily used in the evaluation process can be found on the IEU website: <http://www.unodc.org/unodc/en/evaluation/index.html>)

Primary sources of data include, among others:

Qualitative methods: Structured and semi-structured interviews with key stakeholders²¹, key informants or representatives of different interested entities (face-to-face, by telephone or by webcam);

Quantitative methods: The use of survey questionnaires.

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

1. Attachment to the Funding Agreement dated 02 August 2011, which includes the Log Frame of Activities;
2. 2011 Progress Report;

²¹ Stakeholders here refers to recipient target countries, partners, other beneficiaries, and UNODC management and mentors.

3. 2012 Progress Report;
4. 2013 Progress Report;
5. 2014 Progress Report;
6. 2015 Progress Report;
7. 2014 Mid-term Evaluation Report.

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

VII. TIMEFRAME AND DELIVERABLES

Duties	Time frame	Location	Deliverables
Desk review and preparation of draft Inception Report	23-29 November 2016 (07 working days)	Home based	Draft Inception report containing: preliminary findings of the desk review, refined evaluation questions, data collection instruments (including questionnaire and interview questions), sampling strategy, evaluation matrix and limitations to the evaluation
Review and subsequent clearance of draft Inception Report by IEU (can entail various rounds of comments)	30 November – 01 December 2016	UNODC/HQ	Revised draft Inception Report
Revise the draft Inception Report	02 – 04 December 2016 (03 working days)	Home based	Inception Report is revised and finalised
Deliverable A: Final Inception Report in line with UNODC evaluation norms, standards, guidelines and templates	By 04 December 2016 (10 overall working days)	Home based	Final Inception report to be cleared by IEU
Interviews with staff at UNODC HQ/FO; Evaluation mission: briefing, interviews; presentation of preliminary findings	05 – 11 December 2016 (07 working days)	Vietnam, Cambodia and Lao PDR	Presentation of preliminary findings
Drafting of the evaluation report; submission to Project Management for review of	12 – 21 December 2016 (10 working days)	Home based	Draft evaluation report

factual errors and to IEU for review and comments;			
Project Management reviews factual errors and IEU for reviews and comments	22 December 2016 – 06 January 2017	UNODC/HQ	Revised draft evaluation report
Consideration of comments from the project manager and incorporation of comments from IEU (can entail various rounds of comments)	09 – 11 January 2017 (03 working days)	Home based	Draft evaluation report finalised
Deliverable B: Draft Evaluation Report in line with UNODC evaluation norms, standards, guidelines and templates	By 11 January 2017 (20 overall working days)	Home based	Draft evaluation report, to be cleared by IEU
IEU to share Draft Evaluation Report with Core Learning Partners for comments	12 – 18 January 2017	UNODC/HQ	Revised Draft Evaluation Report
Consideration of comments from Core Learning Partners	19 – 23 January 2017 (03 working days)	Home based	Revised Draft Evaluation Report
Final review by IEU; incorporation of comments and finalization of report	24 – 26 January 2017	UNODC/HQ	Revised Draft Evaluation Report
Presentation of evaluation results	27 January 2017 (01 working day)	Travel to Vienna	Final Evaluation Report presented in Vienna
Deliverable C: Final evaluation report incl. Management response (if needed); presentation of evaluation results	By 27 January 2017 (04 overall working days)	Home based & travel to Vienna	Final evaluation report; Presentation of evaluation results. All to be cleared by IEU
Project Management: Finalise Evaluation Follow-up Plan in ProFi	By 31 January 2017	UNODC/HQ	Final Evaluation Follow-up Plan to be cleared by IEU
Project Management: Disseminate final evaluation report			Final evaluation report disseminated

VIII. EVALUATION TEAM COMPOSITION

The final evaluation will be carried out by one international Independent Evaluation Expert identified by UNODC through a competitive selection process by GPML and reviewed as well as cleared by the Independent Evaluation Unit.

The expert should have expertise in reviewing rule of law, crime prevention and criminal justice programmes, and have experience in evaluating technical assistance projects.

Costs associated with the evaluator will be borne by the programme. The expert shall act independently, in line with UNODC and UNEG Ethical Guidelines and in his individual capacity and not as a representative of any government or organization that may present a conflict of interest.

The qualifications and responsibilities for the evaluators are specified in the job description attached (Annex 1). In the selection process, a gender balance approach will be followed.

The roles and responsibilities of the evaluators include:

- Carry out the desk review;
- Develop the inception report (including sample size and sampling technique);
- Draft the inception report and finalize evaluation methodology incorporating relevant comments (clearance by IEU);
- Implement quantitative tools and analyse data;
- Triangulate data and test rival explanations;
- Present the preliminary findings to UNODC management – consider comments received from the audience;
- Draft an evaluation report in line with UNODC evaluation policy, handbook, guidelines and templates;
- Finalize the evaluation report on the basis of comments received (clearance by IEU);
- Ensure that all aspects of the terms of reference are fulfilled;
- Prepare PowerPoint presentation and present evaluation findings and recommendations in Vienna.

Write your text on top of this in order to create the correct format and style

Absence of Conflict of Interest

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

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

IX. MANAGEMENT OF THE EVALUATION PROCESS

Roles and responsibilities of the Project Manager

The Project Manager is responsible for:

- managing the evaluation,
- drafting and finalizing the ToR,
- selecting Core Learning Partners (representing a balance of men, women and other marginalised groups) and informing them of their role,
- recruiting evaluators following clearance by IEU,
- providing desk review materials (including data and information on men, women and other marginalised groups) to the evaluation team including the full TOR,
- reviewing the inception report as well as the evaluation methodology,
- liaising with the Core Learning Partners,
- reviewing the draft report for factual errors,
- developing an implementation plan for the evaluation recommendations as well as follow-up action (to be updated once per year),
- disseminate the final evaluation report and facilitate the presentation of evaluation results;

The Project Manager will be in charge of **providing logistical support** to the evaluation team including arranging the field missions of the evaluation team, including but not limited to:

- All logistical arrangements for the travel of the consultants (including travel details; DSA-payments; transportation; etc.)
- All logistical arrangement for the meetings/interviews/focus groups/etc., ensuring interview partners adequately represent men, women and other marginalised groups (including translator/interpreter; set-up of meetings; arrangement of ad-hoc meetings as requested by the evaluation team; transportation from/to the interview venues; scheduling sufficient time for the interviews (around 45 minutes); ensuring that members of the evaluation team and the respective interviewees are present during the interviews; etc.)
- All logistical arrangements for the presentation of the evaluation results;
- Ensure timely payment of all fees/DSA/etc. (payments for the evaluators need to be released within 5 working days after the respective deliverable is cleared by IEU).

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

Roles and responsibilities of the evaluation stakeholders

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

Roles and responsibilities of the Independent Evaluation Unit

The Independent Evaluation Unit (IEU) provides mandatory normative tools, guidelines and templates to be used in the evaluation process. Please find the respective tools on the IEU web site <http://www.unodc.org/unodc/en/evaluation/evaluation.html>. Furthermore, IEU provides guidance and evaluation expertise throughout the evaluation process.

IEU reviews and clears all steps and deliverables during the evaluation process: Terms of Reference; Selection of evaluator(s); Inception Report; Draft Evaluation Report; Final Evaluation Report; Evaluation Follow-up Plan.

X. PAYMENT MODALITIES

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

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

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

ANNEX I. Terms of Reference for Evaluator

Title:	Evaluation consultant
Organisational Section/Unit:	Division for Treaty affairs (DTA) Organized Crime and Illicit Trafficking Branch, Implementation Support Section (ISS) Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML) Home based
Name and title of Supervisor:	Oleksiy Feshchneko, Programme Manager of GPML
Duty Station or home-based:	Home based with travel to Viet Nam and Lao PDR
Proposed period:	23 November 2016 to 27 January 2017
Actual work time:	34 working days
Fee Range:	C

1. Background of the assignment:

The Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism encourages anti-money laundering and countering the financing of terrorism policy development, raises public awareness about the cross-cutting aspects of money-laundering and the financing of terrorism, contributes to the strengthening of governance measures and anti-corruption policies, and acts as a centre of expertise of anti-money laundering and, jointly with the Terrorism Prevention Branch, countering the financing of terrorism related matters. The Programme is pivotal to UNODC's mandate to prevent drug offences and other crimes in that it offers specialized services and tools to help Governments deal with an important component of action against crime with a view to removing the profits of such crime and providing a disincentive for committing them.

This evaluation concentrates on the activities of the GPML Adviser in the Mekong region, specifically in Cambodia, Lao PDR, Myanmar and Viet Nam.

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

The evaluation is being conducted to provide accountability to the donor by determining whether the project objectives were met and if resources were wisely utilized. Another reason is also to identify areas of improvement, if needed and to clarify any problems and or challenges encountered. The ultimate goal of the evaluation is to set priorities and goals and to suggest new strategic direction.

2. Purpose of the assignment:

The purpose of the evaluation is to conduct an independent final evaluation (in line with UNODC norms and standards) of the GLOU40 project segment in the Mekong Region. The purpose is furthermore as follows:

- (1) provide information on the impact of UNODC activities in the Mekong region for better decision-making by UNODC management (best practices and lessons learned),
- (2) assess the results of the project and demonstrate to what extent it has achieved its objectives and has been relevant, efficient, cost effective and sustainable,
- (3) serve as a means to empower project stakeholders, target groups, and other beneficiaries but also to offer, if necessary a strategic repositioning of the Programme.
- (4) assess to what extent the mid-term evaluation recommendations were implemented and if they lead to improved Programme performance. In particular, the objectives of the evaluation are to:
 - i. evaluate how GPML contributes to fostering awareness, regional commitment and action to combat money-laundering and the financing of terrorism in coordination with different stakeholders including governments, the international community, the international financial institutions and FATF–Style Regional Body (FSRB);
 - ii. analyse how GPML effectively supports structures for AML/CFT policies and institutional frameworks in the beneficiary countries;
 - iii. analyse how GPML efficiently promotes enhanced AML/CFT coordination and cooperation among Member States, international organizations and AML/CFT regional bodies active in the region.
 - iv. determine the significance of the anti-money laundering/countering the financing of terrorism in the UN agenda and how GPML fulfils this mandate.

Furthermore, it will be assessed to what extent human rights aspects and gender mainstreaming have been taken into account during all phases of the activities in the Mekong region.

The Independent Evaluation Unit reviews and clears all deliverables of this independent project evaluation – this might entail various rounds of comments for each deliverable.

3. Specific tasks to be performed by the evaluator:

The Evaluator will perform the following specific tasks:

- (1) conduct a thorough desk review of available key documents;

- (2) develop an appropriate evaluation methodology and approach, including methodological tools, e.g. sampling strategy, sampling size, quantitative and qualitative questionnaires, interview guidelines, etc.
- (3) conduct telephone interview with Vienna based colleagues and the GPML Adviser in the Mekong to be briefed by the GPML team and to conduct interviews with UNODC Core Learning Partners (CLP) and other key stakeholders.
- (4) finalize an Inception Report, which contains a refined work plan and presents a concise evaluation methodology, guided by UNODC evaluation guidelines and templates, ensuring that impact is assessed whenever possible; including preliminary findings of the desk review and draft evaluation tools (questionnaires; surveys; etc.); to be cleared by IEU before the field mission can be conducted.
- (5) pilot and adjust evaluation approach and tools; collect data through the application of quantitative and qualitative evaluation tools, conduct interviews with stakeholders according to the established sampling method.
- (6) conduct field missions to Lao PDR and Viet Nam, to meet with and interview key GPML partners;
- (7) conduct telephone interviews with GPML partners in Cambodia and Myanmar;
- (8) triangulate all information attained in the process of retrieving secondary and primary data and test rival explanations.
- (9) prepare and deliver a Draft Evaluation Report in line with UNODC Evaluation Policy, Handbook, Guidelines and Templates to the programme manager and IEU for comments and to share a revised Draft Evaluation Report (after initial review by IEU) with the CLP members for comments.
- (10) manage a participatory evaluation process and involving Core Learning Partners (CLP) of the major stakeholder groups (UNODC management, partner organizations, Member States, beneficiaries of the programme and GPML field-based experts or mentors).
- (11) travel to Vienna to give a presentation to the GPML team and UNODC senior management and other interested stakeholders, including Member States and CLP, on the findings of the final draft evaluation report.
- (12) finalise the Evaluation Report on the basis of the comments received, include a management response, and ensure that all UNODC's evaluation guidelines are met; to be cleared by IEU.

Under the guidance of the Independent Evaluation Unit, the key responsibilities of the evaluator include (i) development of the evaluation design with detailed methods, tools and techniques that are gender-inclusive and gender-sensitive, generating information from and about men, women and other marginalised groups as well as about key gender as well as human rights issues (ii) ensuring adherence to the UNEG Norms and Standards, UNODC evaluation norms, standards, guidelines and templates and the evaluation TOR, and (iii) ensuring that all deliverables are submitted in a timely and satisfactory manner and in line with the quality criteria checklist.

4. Expected tangible and measurable output(s)/deliverable(s):

The evaluator will be responsible for the quality and timely submission of his/her specific deliverables, as specified below. All products should be well written, inclusive and have a clear analysis process.

- Draft inception report, containing a refined work plan, methodology and evaluation tools; in line with UNODC evaluation norms, standards, guidelines and templates.
- Presentation of preliminary evaluation findings and recommendations to internal and external key stakeholders (if applicable).
- Draft evaluation report in line with UNODC evaluation norms, standards, guidelines and templates, including an analysis of the performance of the project to adequately address gender as well as human rights issues, with concrete findings and conclusions, and, if needed, specific recommendations on how to improve,
- Revised draft report based on comments received from the various consultative processes (IEU, internal and external).
- Final evaluation report, in line with UNODC evaluation norms, standards, guidelines and templates
- Final presentation of evaluation results to stakeholders.

All deliverables of this evaluation need to be reviewed and cleared by IEU.

According to UNODC rules, the evaluator 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.

The evaluator shall respect the UNEG Ethical Guidelines.

5. Dates and details of deliverables/payments:

Deliverable	Output	Working Days	To be accomplished by (date)
A.	Inception Report	10	04 December 2016
B.	Draft Evaluation Report	20	11 January 2017
C.	Final Evaluation Report	04	27 January 2017

Payments will be made upon satisfactory completion and/or submission of outputs/deliverables.

6. Indicators to evaluate the evaluator's performance:

Timely and satisfactory delivery of the above mentioned outputs as assessed by IEU (in line with UNODC evaluation policy, handbook, guidelines and templates as well as UNEG Standards and Norms²² according to the following indicators:

- Quality of the documents produced;
- Technical competence;
- Timeliness of the delivery;
- All aspects of the Terms of Reference are fulfilled;
- Satisfactory completion of all tasks in line with expected outputs and as assessed by IEU;
- UNODC evaluation norms and standards achieved.

7. Qualifications/expertise sought (required educational background, years of relevant work experience, other special skills or knowledge required):

Advanced university degree in international development, public administration, social science, evaluation or related field.

A minimum of 7 years of professional experience in the field of evaluation of international programmes.

A track record of designing, leading and conducting various types of evaluation, including process, outcome and impact evaluations preferably with experience in conducting evaluations for the United Nations. Experience in working in a team.

Knowledge and experience of the UN System and in particular of UNODC. Knowledge of quantitative and qualitative methods. Knowledge of statistical surveying instruments. Knowledge in the field of money-laundering and financing of terrorism would be an asset.

Experience in gender sensitive evaluation methodologies and analysis, and understanding of human rights and ethical issues in relation to evaluation.

²² Please visit the IEU website for all mandatory templates and guidelines to use in this evaluation: <http://www.unodc.org/unodc/en/evaluation/normative-tools.html>

Fluency in English and excellent English report writing skills; Knowledge of Spanish and/or French would be an advantage.

ANNEX II. List of background documents for the desk review

- Mid-term evaluation 2014.
- Attachment to the Funding Agreement dated 02 August 2011, which includes the Log Frame of Activities.
- 2011 Progress Report.
- 2012 Progress Report.
- 2013 Progress Report.
- 2014 Progress Report.
- 2015 progress Report.
- Project revisions
- Project document
- Evaluation Follow-up plan to the 2014 evaluation
- In-Depth Evaluation Report of 2010.
- Lao PDR Country Programme Framework 2009-2013.
- Viet Nam Country Programme 2012-2017.
- Regional Programme Framework for East Asia and the Pacific 2009-2012.
- UNODC Position Paper on Human Rights (2011)²³
- Guidance Note on Gender Mainstreaming in UNODC (2013)²⁴
- UNODC evaluation guidelines, templates, handbook, policy²⁵
- UNODC Inception Report Guidelines and Template²⁶

23 http://www.unodc.org/documents/justice-and-prison-reform/UNODC_Human_rights_position_paper_2012.pdf

24 <http://www.un.org/womenwatch/directory/docs/UNODC-GuidanceNote-GenderMainstreaming.pdf>

25 <http://www.unodc.org/unodc/en/evaluation/normative-tools.html>

26 <http://www.unodc.org/unodc/en/evaluation/independent-project-evaluations-step-by-step.html#Undertaking>

- UNODC Evaluation Report Guidelines and Template²⁷
- UNEG: Integrating human rights and gender equality in evaluation²⁸

27 <http://www.unodc.org/unodc/en/evaluation/independent-project-evaluations-step-by-step.html#Undertaking>
28 <http://www.uneval.org/detail/980>

ANNEX III. List of stakeholders

Type ²⁹	CLP ³⁰ (mark with X)	Organisation ³¹	Designation ³²	Location
UNODC HQ		UNODC	Chief Heads GPML Branch	Vienna
Donor		State Secretariat for Economic Affairs SECO	Program Manager	Berne
GPML		UNODC	GPML Programe Manager	Vienna
GPML		UNODC	Anti-Money Laundering Adviser	Vienna
GPML Mentor		UNODC	Adviser (AML/CFT)	Vienna
Partner		Counter Terrorism Department	Colonel, Deputy Head	Viet Nam
Partner		Counter Terrorism Department	Captain, Standing Office	Viet Nam
Partner		Anti-Smuggling Department, Customs General	Leader of Department	Viet Nam
Partner		Anti-Smuggling Department, Customs General	Deputy Head of Division	Viet Nam
Partner		Former UK Department for International Development (DFID) Hanoi	Senior Researcher	Viet Nam
Partner		Financial Intelligence Unit (FIU)	Director of the FIU	Lao PDR
Partner		UK Embassy	Deputy Head of Mission	Lao PDR

29 Please include the information, if this person is e.g. an implementing partner, donor, recipient, UNODC HQ, UNODC field, UN agency, etc.

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

31 Please include the name of the organisation the person is working for.

32 Please include the designation/job title of the person.

Partner		Cambodian Customs	Customs and excise adviser	Cambodia
Partner		Asia Pacific Group on Money Laundering (APG)	APG Secretariat	
Partner		Financial Intelligence Unit (FIU)	Director	Myanmar
Partner		ASEAN Law Enforcement Management Program	Coordinator	Viet Nam
Partner		Department of Criminal and Administrative Law Department. MOJ.	Vice Director of Division	Viet Nam

ANNEX II. EVALUATION TOOLS: INTERVIEW GUIDE AND SURVEYS

The interview guide is found below – it contains all evaluation questions. The evaluator created a specific interview sheet for each interview, and noted interviewee responses to each question in the Response column, during the interview. The interview sheets are retained by the evaluator, and formed the basis of analysis/ synthesis work during the evaluation’s third phase.

Interview Sheets

Interviewee Name	
Interviewee Gender	
Interviewee Organisation/ Role	
Interview Date/ Location	

Question	Response Typed directly into the cell during interview.
Relevance	
1. To what extent did the implementation of the recommendations of the mid-term evaluation lead to improved design of the programme?	
2. How relevant is the AML/ CFT agenda to the beneficiary Member States?	
3. How well has GLOU40 adapted its strategies/ approaches to the changing situation in the region?	
4. To what extent are the outputs, outcomes and objectives of GLOU40 relevant to implementing Sustainable Development Goals?	
5. To what extent are the outputs, outcomes and objectives of GLOU40 relevant to overarching UNODC strategy?	
Efficiency	
6. How well have the resources/ inputs (funds, expertise in staff time) been converted to outputs?	
7. What measures have been taken during the planning and implementation of activities to ensure that resources are used efficiently?	
8. Have there been factors in budget and administrative arrangements that have impeded project delivery?	
Effectiveness	
9. To what extent did the implementation of the recommendations of the mid-term evaluation lead to improved implementation of GLOU40?	

10. To what extent has progress been made towards achieving the objectives (outputs and outcomes) of the project as stated in project design documents and related logical frameworks?	
11. To what extent has GLOU40 contributed to, or is likely to contribute to, immediate results for beneficiary/ partner groups, target groups, Member States?	
12. What are the reasons for the achievement and non-achievement of the objectives (outputs and outcomes)?	
Impact	
13. To what extent has GLOU40 contributed to, or is likely to contribute to, long term impact for beneficiary/ partner groups, target groups, Member States?	
14. To what extent does GLOU40 contribute to the SDG, and specifically SDG 16.4: By 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime?	
Sustainability	
15. To what extent are the results generated through project activities likely to be sustained by Member States after completion of the project?	
16. To what extent have programme stakeholders and beneficiaries taken ownership of the objectives of the project?	
17. Are partners/ stakeholders/ beneficiaries committed to continue working project objectives after the end of the project?	
18. To what extent is partner/ stakeholder/ beneficiary engagement likely to be institutionalized after external funding ceases?	
Partnerships and cooperation	
19. How effective has GLOU40 been in leveraging joint initiative opportunities with other United Nations entities (including UNODC Field Offices) and other anti-money laundering bodies throughout the world?	
20. To what extent does GLOU40's collaboration with partner organizations create a value-added synergy which avoids duplication of efforts?	
Human Rights	
21. To what extent have human rights principles been integrated into the delivery of technical assistance under the project?	
22. To what extent has the Regional Programme supported the project as a means to introduce human rights-related standards with partners/ stakeholders/ beneficiaries?	
Gender	
23. What measures have been taken during planning and implementation to ensure that gender aspects were mainstreamed across GLOU40 activities?	
24. What measures have been taken to ensure the inclusion of men, women and marginalised	

groups, throughout activities conducted in the Mekong region?	
Lessons learned	
25. What lessons can be learned from GLOU40's mentoring initiative and other implementation modalities that can assist in improving performance, results and effectiveness in the future?	
26. What lessons can be drawn from GLOU40's engagement with target beneficiaries such as legislators, prosecutors, FIU analysts and law enforcement officials during local capacity-building joint collaborations?	
27. What good practice in general emerged from the implementation of GLOU40 that can be replicated in other programmes and projects?	
28. What is considered to be the most effective aspect of the mentoring initiative of GLOU40 on AML/ CFT progress in the Mekong region?	

Question	Response
29. Do you have any other comments you would like to make about GLOU40?	30.

Survey Questions

A survey will be undertaken with representatives of partners/ stakeholders involved in GLOU40 in each of Vietnam, Cambodia, Myanmar and Lao PDR. The survey will align directly with the evaluation questions, but will provide a quantitative approach to analysis of specific key areas of the evaluation (see the Evaluation Matrix at Chapter V). The survey will be prepared in hard copy and in an on-line version (Survey Monkey). Interviewees will be invited to complete the survey at the end of interviews. Other potential respondents will be approached for completing the survey on-line.

The survey will need to be translated into local languages.

Question 1 - How relevant is the AML/ CFT agenda to your country's strategic direction?

Responses:

5 – Very relevant.

4 – Somewhat relevant.

3 – Neither relevant nor irrelevant.

2 – Somewhat irrelevant.

1 – Completely irrelevant.

Question 2 - UNODC and GLOU40 budget and administrative arrangements have assisted in the efficient delivery of the project?

Responses:

5 – I strongly agree.

4 – I somewhat agree.

3 – I neither agree nor disagree.

2 – I somewhat disagree.

1 – I strongly disagree.

Question 3 - GLOU40 has contributed to immediate results for my country in dealing with money laundering.

Responses:

5 – I strongly agree.

4 – I somewhat agree.

3 – I neither agree nor disagree.

2 – I somewhat disagree.

1 – I strongly disagree.

Question 4 - The outcomes of GLOU40 are likely to have a long term impact for my country in dealing with money laundering?

Responses:

5 – I strongly agree.

4 – I somewhat agree.

3 – I neither agree nor disagree.

2 – I somewhat disagree.

1 – I strongly disagree.

Question 5 - After GLOU40 ends, my country is likely to continue with the changes (strategy, policy, practice) that have been a part of our work with the project.

Responses:

5 – I strongly agree.

4 – I somewhat agree.

3 – I neither agree nor disagree.

2 – I somewhat disagree.

1 – I strongly disagree.

Question 6 - We think of ourselves as the owners and drivers of the changes in policy and practice that is part of our work with the project?

Responses:

5 – I strongly agree.

4 – I somewhat agree.

3 – I neither agree nor disagree.

2 – I somewhat disagree.

1 – I strongly disagree.

Question 7 – How satisfied are you overall with the GLOU40 project.

5 – Very satisfied.

4 – Somewhat satisfied.

3 – Neither satisfied nor unsatisfied.

2 – Somewhat unsatisfied.

1 – Very unsatisfied.

ANNEX III. DESK REVIEW LIST

Provided documentation gives a useful overlay to the project's context and intent. Project design documentation shows the evolution of project design through different versions, and project reporting addresses most details related to activities, and some detail on results/outcomes. The following is a list of all documents reviewed by the evaluator.

- Project document.
- Attachment to the Funding Agreement dated 02 August 2011, which includes the Log Frame of Activities.
- In-Depth Evaluation Report of 2010.
- 2011 Progress Report.
- 2012 Progress Report.
- 2013 Progress Report.
- 2014 Progress Report.
- Mid-term evaluation 2014.
- Evaluation follow-up plan to the 2014 evaluation
- 2015 progress Report.
- Project revision – September 2016
- Lao PDR Country Programme Framework 2009-2013.
- Log frame GPML AML/CFT Mentor for Lao PDR and Cambodia-2011-2013
- Vietnam Country Programme 2012-2017.
- Log frame GPML AML/CFT Mentor for Vietnam-2011-2013
- Log frame GPML AML/CFT Mentor for Myanmar-2011-2013
- Regional Programme Framework for East Asia and the Pacific 2009-2012.
- Thematic Programme on Action against Transnational Organised Crime and Illicit Trafficking, including Drug Trafficking
- June 2011. *FATF Guidance. Anti-money laundering and terrorist financing measures and Financial Inclusion*. APG, World Bank, FATF.
- UNODC Position Paper on Human Rights (2011)
- Guidance Note on Gender Mainstreaming in UNODC (2013)
- UNODC evaluation guidelines, templates, handbook, policy
- UNODC Inception Report Guidelines and Template
- UNODC Evaluation Report Guidelines and Template
- UNEG: Integrating human rights and gender equality in evaluation

ANNEX IV. LIST OF PERSONS CONTACTED DURING THE EVALUATION

Number of interviewees	Organisation	Sex disaggregated data	Country
2	Counter Terrorism Department	Male: 2 Female:	Vietnam
2	Ministry of Justice	Male: 1 Female: 1	Vietnam
	Vietnam Customs – Anti-smuggling Department	Male: 1 Female:	Vietnam
1	Bingham Centre for the Rule of Law	Male: 1 Female:	UK
1	Lao PDR Financial Intelligence Unit	Male: Female: 4	Lao PDR
1	Cambodia Customs	Male: 1 Female:	Cambodia
1	Myanmar Financial Intelligence Unit	Male: 1 Female:	Myanmar
1	Asia Pacific Group on Money Laundering	Male: 1 Female:	Australia
1	ASEAN Law Enforcement Management Program	Male: Female: 1	Australia
1	DfID	Male: 1 Female:	Lao PDR
1	Swiss Government	Male: 1 Female:	Berne
1	ARIN-AP	Male:	South Korea

		Female: 1	
1	Australian Federal Police	Male: 1 Female:	Vietnam
3	UNODC	Male: 1 Female: 2	Vietnam
3	UNODC Vienna	Male: 3 Female:	Austria
1	US State Department	Male: Female: 1	USA
1	US Treasury Department	Male: 1 Female:	Lao PDR
Total: 26		Male: 16 Female: 10	

ANNEX V. EVALUATION MATRIX

The evaluation questions below are the final, agreed evaluation questions from the Inception Report.

Evaluation Question ³³	Indicator(s), data ³⁴	Collection method(s) ³⁵ D = Desk/ Documents I = Interview S = Survey	Data source ³⁶ Prodoc = Project Document, revisions, etc PR = Progress reports PS = Project Staff ³⁷ S = Stakeholders	Comments
Relevance				
1. To what extent did the	Correlation between recommendations and subsequent project	D, I, S	Prodoc	Some impact in certain areas or in

³³ Please state all evaluation questions.

³⁴ Please state the indicators/data that will be used to answer the respective evaluation question.

³⁵ Please state the data collection methods that will be used to answer the respective evaluation question.

³⁶ Please state the data sources that will be used to answer the respective evaluation question.

³⁷ PS refers to all relevant project staff.

implementation of the recommendations of the mid-term evaluation lead to improved design of the programme?	approach. Confidence of project personnel in approaches. An obvious and visual implementation of the recommendations.		PR PS	relation to specific recommendations.
2. How relevant is the AML/ CFT agenda to the beneficiary Member States?	Correlation between the AML/ CFT agenda and stated Member State priorities/ strategies. Correlation between Member State external obligations (agreed) and the AML/ CFT agenda.	D, I, S	Prodoc PR PS S	Significant relevance to Member States and their work on AML.
3. How well has GLOU40 adapted its strategies/ approaches to the changing situation in the region?	Visible work from the project on updates to its knowledge of local/ regional changes in policy or priorities. Visible and apparent changes in design/ approach/ activities.	I	Prodoc PR PS S	The Project approaches and the actual approach of the mentor is nimble, responsive and maintains relevance of action.
4. To what extent are the outputs, outcomes and objectives of GLOU40 relevant to implementing Sustainable Development Goals?	Clear stated correlation in design and reporting between SDG 16.4 and the specific activities (as well as larger intended outcomes) of GLOU40.	D, I	Prodoc PR PS S	Significant relevance to the SDGs, particularly 16.4.
5. To what extent are the outputs, outcomes and objectives of GLOU40 relevant to overarching UNODC strategy?	Clear stated correlation in design and reporting between UNODC strategy frameworks and the specific activities (as well as larger intended outcomes) of GLOU40.	D, I	Prodoc PR PS S	Significant relevance to UNODC strategies.
Efficiency				
6. How well have the resources/ inputs (funds, expertise in staff time) been converted to outputs?	Achievement of project outputs. Reported outputs from partners, stakeholders, beneficiaries.	I	Prodoc PR PS S	The use of mentor and related time and energy, and the use of related implementation resources appears efficient and is clearly delivering outputs.
7. What measures have been taken during the planning and implementation of activities to ensure that resources are used efficiently?	Planning approaches in place. Systems of planning and decision-making. Visible concentration in planning and decision-making systems of a concentration on efficient use of resources.	I	Prodoc PR PS S	Regular and dedicated planning processes take place in the GLOU40 offices.
8. Have there been factors in budget and administrative arrangements that have impeded project delivery?	Lateness in delivery of activities. Lateness in payments. Issues with processes/ reporting/ relationships with	D, I, S	Prodoc PR PS	UMOJA is a significant impediment to both project administration and implementation.

	counterparts as a result of administrative or budget processes/ procedures.		S	
Effectiveness				
9. To what extent did the implementation of the recommendations of the mid-term evaluation lead to improved implementation of GLOU40?	Correlation between recommendations and subsequent project activities/ outputs/ outcomes.	D, I, S	Prodoc PR PS	Some impact in certain areas or in relation to specific recommendations.
10. To what extent has progress been made towards achieving the objectives (outputs and outcomes) of the project as stated in project design documents and related logical frameworks?	Actual activities undertaken. Actual outputs delivered. Actual outcomes achieved.	D, I	Prodoc PR PS S	Good progress is being made in delivering planned activities and in achieving intended outputs and outcomes.
11. To what extent is there a systematic approach to monitoring of results (outcomes and outputs) against plans, and strategic frameworks?	System Approaches	D, I	PR PS	The logical frameworks for GLOU40 do not correlate well with the related GPML logframe, and project reporting does not contribute effectively to understanding project activities and results.
12. To what extent has GLOU40 contributed to, or is likely to contribute to, immediate results for beneficiary/ partner groups, target groups, Member States?	Actual outcomes achieved by Member States, partners, beneficiaries in line with their stated policy/ strategy documents.	D, I, S	Prodoc PR PS S	Some immediate results are visible, in skilling up, and in legislative frameworks in particular. However, more results are anticipated in the longer term.
13. What are the reasons for the achievement and non-achievement of the objectives (outputs and outcomes)?	Stated factors. Stated reasons.	I	Prodoc PR PS S	The two most significant impacts on project results are political processes and political will in the four countries and the impediments found in the implementation of the UMOJA system. While both impact, the Project addresses these areas effectively.
Impact				
14. To what extent has GLOU40 contributed to, or is likely to contribute to, long term impact for beneficiary/ partner groups, target	Actual outcomes achieved by Member States, partners, beneficiaries in line with their stated policy/ strategy documents.	I, S	Prodoc PR PS	Impact is not visible, but there are clear indications of 'road to impact' in the legislative/ penal code frameworks and in the training of trainers outcomes

groups, Member States?			S	with police and customs agencies.
15. To what extent does GLOU40 contribute to the SDG, and specifically SDG 16.4: By 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime?	Actual outcomes achieved by Member States, partners, beneficiaries in line with their stated policy/ strategy documents.	D, I	Prodoc PR PS S	GLOU40 is making a strong contribution to SDG 16.4. It is a difficult goal to achieve, but the approaches and practice of the Project are relevant and effective in the Project's geography.
Sustainability				
16. To what extent are the results generated through project activities likely to be sustained by Member States after completion of the project?	Actual activities undertaken. Actual outputs delivered. Actual outcomes achieved by Member States, partners, beneficiaries in line with their stated policy/ strategy documents. Defined project exit strategy, including clearly defined support strategies for Member Countries that are focused on sustainability of outcome.	I, S	Prodoc PR PS S	Sustainability is not yet certain. Indications are good, particularly with practitioners, but a greater indication of support/ commitment at the higher political levels is necessary to have confidence in sustainability.
17. To what extent have programme stakeholders and beneficiaries taken ownership of the objectives of the project?	Actual activities undertaken. Actual outputs delivered. Actual outcomes achieved by Member States, partners, beneficiaries in line with their stated policy/ strategy documents. Defined project exit strategy, including clearly defined support strategies for Member Countries that are focused on sustainability of outcome.	I, S	Prodoc PR PS S	Indications are good, particularly with practitioners, but a greater indication of support/ commitment at the higher political levels is necessary to have confidence in ownership.
18. Are partners/ stakeholders/ beneficiaries committed to continue working project objectives after the end of the project?	Actual activities undertaken. Actual outputs delivered. Actual outcomes achieved by Member States, partners, beneficiaries in line with their stated policy/ strategy documents. Defined project exit strategy, including clearly defined support strategies for Member Countries that are focused on sustainability of outcome.	I, S	Prodoc PR PS S	Indications are good, particularly with practitioners, but a greater indication of support/ commitment at the higher political levels is necessary to have confidence in ongoing implementation.
19. To what extent is partner/ stakeholder/ beneficiary engagement likely to be institutionalized after	Actual activities undertaken. Actual outputs delivered. Actual outcomes achieved by Member States, partners,	I	Prodoc PR	Indications are good, particularly with practitioners, but a greater indication of support/ commitment at the higher

external funding ceases?	beneficiaries in line with their stated policy/ strategy documents. Defined project exit strategy, including clearly defined support strategies for Member Countries that are focused on sustainability of outcome.		PS S	political levels is necessary to have confidence in institutionalisation.
Partnerships and cooperation				
20. How effective has GLOU40 been in leveraging joint initiative opportunities with other United Nations entities (including UNODC Field Offices) and other anti-money laundering bodies throughout the world?	Examples of exchange. Visibility of exchange/ inputs in reporting. Examples of cooperation/ coordination.	D, I	Prodoc PR PS S	Partnership approaches and outcomes are a particularly visible, effective and replicable aspect of the work of the Project.
21. To what extent does GLOU40's collaboration with partner organizations create a value-added synergy which avoids duplication of efforts?	Examples of added value in activities and outcomes. Visibility of exchange/ inputs in reporting. Examples of cooperation/ coordination.	D, I	Prodoc PR PS S	The partnership approach of the Project creates significant synergies and is particularly effective in avoiding duplication and in adding value to the work of all partners.
Human Rights				
22. To what extent have human rights principles been integrated into the delivery of technical assistance under the project?	Visibility of a rights-based approach in design. Visibility of a rights-based approach in implementation. Visibility of a rights-based approach in reporting.	D, I	Prodoc PR PS S	Human rights principles, particularly specific rights relevant to suspects in investigations, are prevalent in Project approaches.
23. To what extent has the Regional Programme supported the project as a means to introduce human rights-related standards with partners/ stakeholders/ beneficiaries?	Visibility of a rights-based approach in design. Visibility of a rights-based approach in implementation. Visibility of a rights-based approach in reporting.	D, I	Prodoc PR PS S	Human rights principles, particularly specific rights relevant to suspects in investigations, are prevalent in Project approaches.
Gender				
24. What measures have been taken during planning and implementation to ensure that gender aspects were mainstreamed across GLOU40 activities?	Visibility of a gender-focused approach in design. Visibility of a gender-focused approach in implementation. Visibility of a gender-focused approach in reporting.	D, I	Prodoc PR PS S	There is no significant focus on gender equality and gender mainstreaming in Project design or implementation.
25. What measures have been taken to ensure the inclusion of men, women	Visibility of a gender-focused approach in design.	D, I	Prodoc	There is no significant focus on gender equality and gender mainstreaming in

and marginalised groups, throughout activities conducted in the Mekong region?	Visibility of a gender-focused approach in implementation. Visibility of a gender-focused approach in reporting.		PR PS S	Project design or implementation. There is a focus on gender balance in training programmes, but the view is that there is limited scope, given the technical nature of addressing money laundering, for a significant focus on gender mainstreaming.
Lessons learned				
26. What lessons can be learned from GLOU40's mentoring initiative and other implementation modalities that can assist in improving performance, results and effectiveness in the future?	Statements of learned lessons. Statements of changes in practice based on lessons learned.	I	Prodoc PR PS S	
27. What lessons can be drawn from GLOU40's engagement with target beneficiaries such as legislators, prosecutors, FIU analysts and law enforcement officials during local capacity-building joint collaborations?	Statements of learned lessons. Statements of changes in practice based on lessons learned.	I	Prodoc PR PS S	
28. What good practice in general emerged from the implementation of GLOU40 that can be replicated in other programmes and projects?	Statements of learned lessons. Statements of changes in practice based on lessons learned.	I	Prodoc PR PS S	
29. What is considered to be the most effective aspect of the mentoring initiative of GLOU40 on AML/ CFT progress in the Mekong region?	Statements of learned lessons. Statements of changes in practice based on lessons learned.	I	Prodoc PR PS S	

ANNEX VI. RESPONSES TO THE SURVEY

The survey was undertaken with representatives of partners/ stakeholders involved in GLOU40 in each of Vietnam, and was distributed to survey respondents by local Agency representatives. As a result, it is unclear how many surveys were issued. The survey was also completed by participants in interviews.

A total of 16 surveys were returned. Each question in each survey was answered by each respondent.

Question 1 - How relevant is the AML/ CFT agenda to your country's strategic direction?

Average Response: The average response to the question was 4.79, indicating a high degree of relevance in the AML/ CMT agenda for Vietnam.

Question 2 - UNODC and GLOU40 budget and administrative arrangements have assisted in the efficient delivery of the project?

Average Response: The average response to the question was 4.5, indicating the belief that administrative arrangements in GLOU40 were supportive of the Project.

Question 3 - GLOU40 has contributed to immediate results for my country in dealing with money laundering.

Average Response: The average response to the question was 4.29, indicating agreement about immediate results, although not at the strength of other responses.

Question 4 - The outcomes of GLOU40 are likely to have a long term impact for my country in dealing with money laundering?

Average Response: The average response to the question was 4.5, indicating strongly that GLOU40 will have a long term impact on addressing ML.

Question 5 - After GLOU40 ends, my country is likely to continue with the changes (strategy, policy, practice) that have been a part of our work with the project.

Average Response: The average response to the question was 4.5, providing support to the likelihood of sustainability of change.

Question 6 - We think of ourselves as the owners and drivers of the changes in policy and practice that is part of our work with the project?

Average Response: The average response to the question was 4.71, indicating strongly that respondents see themselves as drivers of change.

Question 7 – How satisfied are you overall with the GLOU40 project.

Average Response: The average response to the question was 4.71, indicating a high level of satisfaction with GLOU40.