FINAL INDEPENDENT PROJECT EVALUATION

FOSTERING SUSTAINABLE DEVELOPMENT BY SUPPORTING THE IMPLEMENTATION OF THE UNITED NATIONS CONVENTION AGAINST CORRUPTION IN COUNTRIES ALONG THE SILK ROAD ECONOMIC BELT

PDF-SDG-2019-02.2-2
JANUARY 2023
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# ABBREVIATIONS AND ACRONYMS

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<tr>
<th>Abbreviation or Acronym</th>
<th>Full name/word</th>
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<tbody>
<tr>
<td>AIIB</td>
<td>Asian Infrastructure Investment Bank</td>
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<tr>
<td>Belt</td>
<td>Silk Road Economic Belt</td>
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<td>BiH</td>
<td>Bosnia and Herzegovina</td>
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<td>BRI</td>
<td>Belt and Road Initiative</td>
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<td>CSOs</td>
<td>Civil society organizations</td>
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<td>CSS</td>
<td>Conference Support Section</td>
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<tr>
<td>GDP</td>
<td>Gross domestic product</td>
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<tr>
<td>GLOBE Network</td>
<td>Global Operational Network of Anti-Corruption Law Enforcement Authorities</td>
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<td>GLOZ99</td>
<td>Global Programme to prevent and combat corruption through effective implementation of the United Nations Convention against Corruption in support of Sustainable Development Goal 16</td>
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<td>IO</td>
<td>International organization</td>
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<td>IRM</td>
<td>Implementation Review Mechanism</td>
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<tr>
<td>KII</td>
<td>Key Informant Interview</td>
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<tr>
<td>LGBT</td>
<td>Lesbian, gay, bisexual, and transgender</td>
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<td>LNOB</td>
<td>Leaving no one behind</td>
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<td>NCS</td>
<td>National Commission of Supervision</td>
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<td>PWD</td>
<td>Persons with disabilities</td>
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<td>SDG</td>
<td>Sustainable Development Goal</td>
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<td>TOR</td>
<td>Terms of Reference</td>
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<td>UN</td>
<td>United Nations</td>
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<td>UNEG</td>
<td>United Nations Evaluation Group</td>
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<td>UNPDF</td>
<td>United Nations Peace and Development Trust Fund</td>
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<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
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<td>WB</td>
<td>World Bank</td>
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**Recommendations**

<table>
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<tr>
<th></th>
<th>Management Response</th>
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<tr>
<td>1. <strong>Network sustainability and expansion</strong>: To continue supporting the Anti-Corruption Network by facilitating communication between its members and mobilizing resources for development of a long-term project. &lt;br&gt;Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC, Timeframe: by June 2023</td>
<td>Accepted</td>
</tr>
<tr>
<td>2. <strong>Dissemination and presentation of knowledge products</strong>: To develop a plan for dissemination and presentation of publications in order to reach a larger audience. &lt;br&gt;Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC, Timeframe: by April 2023</td>
<td>Accepted</td>
</tr>
<tr>
<td>3. <strong>Directory and communication portal</strong>: To update the directory of designated focal points and submit it to all target countries before the project is over. Consider developing a functional and user-friendly communication platform in the future for effective interaction among the network members, subject to the availability of funds and the network expansion. &lt;br&gt;Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC, Timeframe: by June 2023</td>
<td>Partially accepted. The establishment of the communication platform will be subject to further evaluation and discussions regarding the need and modalities and the availability of funds.</td>
</tr>
<tr>
<td>4. <strong>Exit strategy</strong>: To develop an exit strategy for every future project at its onset to maximize sustainability and engage all key project stakeholders in the exit strategy development. They will be better prepared to continue the project on their own after its ending. &lt;br&gt;Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC, Timeframe: by end of 2023</td>
<td>Partially accepted. An exit strategy was envisaged at the outset of the project. However, during the implementation, it turned out that UNODC may be better suited to maintain the Network instead of China or another national government. Therefore, in consultation with the Government of China and other Network members, it was decided that UNODC would continue supporting this Network. Funds were mobilized accordingly.</td>
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<tr>
<td>5. <strong>Inter-regional project with national focus</strong>: To keep an inter-regional approach in the next projects but add activities focusing on the national needs. This will promote international cooperation and exchange of cross-regional practices, while also addressing the national needs and nurturing local ownership.</td>
<td>Accepted</td>
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This is just a short synopsis of the recommendation, please refer to the respective chapter in the main body of the report for the full recommendation.
<table>
<thead>
<tr>
<th>Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, Timeframes: by June 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6. Formulation of policy outcomes:</strong> To carefully formulate the policy outcomes. The time horizon for attaining a policy outcome should be longer than 12 months. To develop policies, projects need to equip national stakeholders with sufficient capacity, expertise as well as relevant information and clearly communicate the policy expectations to the beneficiaries.</td>
</tr>
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**Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC, Timeframe: by June 2023**

| Accepted |
INTRODUCTION

PROJECT DESCRIPTION AND OBJECTIVES

In January 2020, the UNODC launched a new project entitled, ‘Fostering sustainable development by supporting the implementation of the United Nations Convention against Corruption (UNCAC) in countries along the Silk Road Economic Belt’ (Belt). The project was designed to improve the accountability and integrity structures in the BRI participating countries by, inter alia, establishing and maintaining a network of practitioners from countries along the Belt with a view to addressing corruption in international investment projects, and enhancing international cooperation through sharing information, experiences, good practices, and peer-learning. The project’s overarching goal was to enhance synergies between promoting sustainable development through the support of UNCAC implementation and mitigating corruption risks in relation to the Belt and Road Initiative (BRI). The project’s scope was inter-regional encompassing countries mainly in three regions (Central Asia, South Caucasus, and Southeastern Europe), where Belt’s investment projects were implemented.

The project was implemented in close cooperation with the Government of China. The United Nations Peace and Development Trust Fund (UNPDF) funded the project through its 2030 Agenda for Sustainable Development Sub-Fund. The total project budget amounted to $500,528.18. Initially, the project was planned to run for 12 months, through December 2020. Due to the COVID-19 pandemic, it was extended at no cost until 30 September 2022.

The project intended to achieve its objective by reaching two outcomes: enhancing engagement of beneficiary countries through the anti-corruption network and improving the capacity of project beneficiaries (policymakers and anti-corruption practitioners). To attain these results, the project implemented a total of five outputs, including development of the knowledge products, creation of a knowledge-sharing database, capacity building, establishment of the anti-corruption network, forming a directory of designated focal points, and elaboration of technical specifications (Terms of Reference) for the online forum to facilitate communication among the network members.

PURPOSE, SCOPE AND METHODOLOGY OF EVALUATION

The main purpose of the final evaluation was to assess the project activities, outcomes and achievements against the planned work. The evaluation also examined the project’s relevance, coherence, efficiency, impact, and sustainability. It paid close attention to the project’s inclusiveness, focusing particularly on human rights and gender equality. In addition, key lessons learned, and good practices were identified from project implementation to improve the design and management of future UNODC projects in this area.

The evaluation covered the entire project duration from its inception in January 2020 until the end of September 2022. The evaluation assessed all project activities designed for 16 target countries located mainly across the three regions (Central Asia, South Caucasus, and Southeastern Europe).

Time constraint was the key barrier to the evaluation. Only two months were allotted for the desk review, data collection, and drafting of the evaluation report. To mitigate this, the evaluator focused on the most relevant issues for UNODC. Another limitation was the unavailability of government stakeholders for

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2 The Belt and Road Initiative (BRI), proposed by the Chinese government in 2013, targets on international investment projects, including large-scale infrastructure projects.

3 Albania, Armenia, Azerbaijan, Bosnia and Herzegovina (BiH), China, Georgia, Greece, the Islamic Republic of Iran (Iran), Kazakhstan, Kyrgyzstan, Mongolia, Montenegro, Serbia, Tajikistan, Türkiye, and Uzbekistan.
interviews. The evaluator repeatedly contacted them by offering flexibility in terms of timing (accommodating different time zones) and languages (Russian and English).

To collect data, the evaluation used two tools to ensure triangulation of evidence: a desk review and remote semi-structured interviews with key informants (individual or in group). The evaluator interviewed a total of 24 individuals (8 female and 16 male) who represented an entire community of project stakeholders, including 11 anti-corruption professionals from 10 target countries.

The evaluation findings will be important for the UNODC staff to inform the design of similar initiatives in this area. The project donor (UNPDF) and the key counterpart (Government of China) will also benefit from the evaluation results through the use of evaluation findings for future projects.

A female expert with sound international experience in both evaluation and the security sector conducted this evaluation.

MAIN FINDINGS PER EVALUATION CRITERIA

Relevance: Sixteen countries participated in this project. The evaluation found that the project was relevant to their needs. It responded to their priorities in terms of increasing knowledge of preventing and combating corruption in international investment projects, particularly in large infrastructure projects, as this sphere was new for many of these countries. The project was also in line with their needs to improve their national anti-corruption practices and forge international cooperation. The project was aligned with the goals of UNCAC and Sustainable Development Goal (SDG) 16. The project design was appropriate to meet the anticipated results. There were causal relationships between the project objective, outcomes, and outputs.

Efficiency: Due to the COVID-19 pandemic, the project was extended three times at no cost for two years until the end of September 2022. The pandemic caused substantial delays in project implementation, but as a whole, the project succeeded in adjusting its interventions to respond to challenges caused by the pandemic. The project used all of its funding; its utilization rate was 100%. The project staff was proactive in using external resources to develop additional outputs within the project (e.g., three extra webinars were co-funded by the UNODC's Global Operational Network of Anti-Corruption Law Enforcement Authorities/GLOBE Network). The project also used cost-effective strategies, resulting in cost savings. The target countries benefited from the project's inter-regional approach as it enabled them to both establish international contacts and learn relevant best practices. Nonetheless, some of the beneficiaries expressed the need for parallel interventions focusing on national needs to support them in putting into practice the newly learned international best practices.

Coherence: The multi-stakeholder approach exploited by the project provided a proper framework for examining the anti-corruption strategies from various angles. Thanks to this approach, the project worked with a diversified group of beneficiaries such as policymakers, lawmakers, and practitioners working in the national anti-corruption bodies, judicial institutions, law enforcement bodies, public procurement agencies, and a small number of business organizations. By doing so, the project promoted a holistic approach to tackling challenges in countering corruption. To implement its activities, the project closely collaborated with a diverse group of external partners. In particular, the project closely collaborated with the Government of China to jointly coordinate its activities. It also actively worked with the UNODC Regional Office for Central Asia (based in Tashkent, Uzbekistan) and the Programme Office in Serbia (based in Belgrade) to jointly organize some project activities.

Effectiveness: The project achieved all five of its targeted outcome indicators. The Anti-Corruption Network of Practitioners was created. Yet, the network cannot sustain without further financial support from UNODC or other sources. The project produced a larger quantity of knowledge products than anticipated. Instead of two publications, a total of five knowledge products were produced. Dissemination and presentation of these

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4 Albania, Armenia, Azerbaijan, Bosnia and Herzegovina (BiH), China, Georgia, Greece, the Islamic Republic of Iran (Iran), Kazakhstan, Kyrgyzstan, Mongolia, Montenegro, Serbia, Tajikistan, Türkiye, and Uzbekistan.
knowledge products were not foreseen by the project design, but they should be broadly circulated to reach a wider audience. The project also created a knowledge-sharing database, the first systemized collection of relevant anti-corruption standards and tools in the area of public finance management, investment and procurement.

Two out of sixteen countries are in the process of developing their anti-corruption policies. They still need to be enacted. The project developed a directory of designated focal points under this network and developed the TOR for a secure communication system of network members.

**Impact:** The project brought corruption in international investment projects, specifically in the infrastructure sector, to the attention of law enforcement agencies and anti-corruption bodies in numerous target countries. This sector is now on the radar of anti-corruption practitioners. The project also raised awareness of law enforcement bodies as well as corruption prevention bodies of loopholes enabling corruption schemes in the implementation of international investment projects. It increased their capacity to tackle them by setting up appropriate preventive measures and policies and effectively detecting and prosecuting corruption offences. Despite obstacles of participation for some countries due to the newly emerged political sensitivities over BRI after the launch of the project, the project team made considerable effort to bring together the majority of the target countries under the framework of the Anti-Corruption Network and paved the way for other international players and countries to join the network to more effectively address corruption challenges in BRI projects. Moreover, project beneficiaries from 16 countries established contacts through the network and project activities and have had the opportunity to liaise with experts from the most prominent initiatives and organizations in the field.

**Sustainability:** Without further and continuous support, sustainability of the Anti-Corruption Network is questionable. An exit strategy for this network and the project changed over the course of the project implementation primarily due to geopolitical factors. The exit strategy and its alteration were not clearly articulated in the project documentation. The capacity of a large number of anti-corruption practitioners was enhanced, and thus, it is reasonable to expect that a significant part of these beneficiaries will continue using the new skills. Due to the inter-regional nature of this project, local ownership development was not the primary focus of the project. The knowledge-sharing database and the projects’ knowledge products are an element of its sustainability.

**Human rights, gender equality, disability inclusion and LNOB:** Since the project was designed for government officers, it did not directly target marginalised populations. However, the primary objective of the project was to promote sustainable development, which is essentially linked to human rights. In addition, in the sense that large investment projects have a significant impact on the development and economic growth of nations as well as the life quality of their population, this project addressed human rights. Thus, the project indirectly promoted human rights. Women were encouraged to participate in project activities despite the absence of a gender-specific focus in its design. For instance, nearly half of the workshop attendees in one of the workshops (Belgrade) were women.

**MAIN CONCLUSIONS**

This project was of pioneering nature and regarded as the first intervention undertaken by an international organization to address corruption challenges in the BRI’s international projects, specifically, in its Belt component. The project design was based on evidence and reflected the needs and priorities of anti-corruption agencies in target countries as well as of the cooperating agency – the Government of China.

The planned activities were interconnected with the project targets and indicators. The project was a part of the UNODC’s Global Anti-Corruption Program (GLOZ99). In this regard, the project objective was consistent with GLOZ99’s goals. Overall, the project benefitted from effective partnerships and cooperation. Close synergies were forged with the UNODC’s GLOBE Network. The project strengthened its existing partnership with the UNODC Regional Office for Central Asia and Programme Office in Serbia, which contributed to the
project’s overall effectiveness. The project did not duplicate the initiatives of other donors in preventing and combating corruption in international investment projects in target countries. To achieve project results, the project also built sound cooperation with external partners such as World Bank (WB), Asian Infrastructure Investment Bank (AIIB), and Open Contracting Partnership.

The project was successful in using cost-effective strategies, resulting in a cost reduction. The project was also able to adjust its interventions to respond to the impact of the COVID-19 pandemic. All planned activities were implemented that contributed to achieving the expected accomplishments and the overall objective. In particular, the Anti-Corruption Network of Practitioners was formed, and the capacity of project beneficiaries was increased.

The project’s long-lasting and enduring effect was that the anti-corruption practitioners’ awareness of loopholes enabling and causing corruption in any international investment project was expanded. Beneficiaries expanded their knowledge about implementation modalities and cycles of investment projects, procurement processes and new strategies to tackle corruption challenges through preventive and law enforcement measures. Many beneficiary countries shifted their focus to this sector as a result of the intervention. The project achieved valuable results which could be used by other international actors to tackle corruption challenges in international investment projects.

The project’s sustainability elements include the acquired skills and capacity, knowledge products, and a knowledge-sharing database. The sustainability of the Network is an issue. It needs further support to be fully functional. If supported, it can be expanded both thematically and quantitatively attracting new BRI-participating countries.

**MAIN RECOMMENDATIONS**

The evaluation made a total of six recommendations, which are all addressed to the Convention Support Section (CSS), Corruption and Economic Crime Branch at UNODC. The four most important recommendations are provided below, while the full list of recommendations may be found in the main body of the report:

1. **Network sustainability and expansion** (based on finding 10 (Sustainability):
   To continue supporting the Anti-Corruption Network by facilitating communication between its members and mobilizing resources with a view to developing a long-term initiative.

2. **Dissemination and presentation of knowledge products** (based on finding 7 (Effectiveness):
   To develop and implement a plan for the dissemination and presentation of knowledge products in order to reach a wider audience.

3. **Directory and communication portal**: Based on finding 8 (Effectiveness):
   To update the directory of designated focal points and submit it to all target countries before the project is over. To consider developing a user-friendly communication platform in the future for effective interaction among the network members, subject to the availability of funds and the network expansion.

6. **Formulation of policy outcome**: Based on finding 5 (Coherence):
   To carefully formulate the policy outcomes. The time horizon for attaining a policy outcome should be longer than 12 months. To support policy development, the projects need to equip national stakeholders with sufficient capacity and expertise as well as relevant information and clearly communicate the policy expectations to the beneficiaries.

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5 Please note that the Executive Summary only includes the most important recommendations as identified by the evaluation team. All recommendations can be found in the main body of the report.
MAIN LESSONS LEARNED

The evaluation identified the four major lessons learned and five good practices. Below is a list of the most important, with the complete list appearing in the report’s main body.

**Networking:** When the number of in-person events is limited, the same participants from target countries must attend them to forge strong connections amongst members of the network. A newly established network also requires continuing facilitation to encourage communication among its members.

**Project timeframe:** The original 12-month project duration was insufficient to ensure the adoption of policy guidance and to develop in-depth, peer-reviewed publications. As policymaking entails longer periods than the timeframe initially planned by the project, more time horizons should be planned for such components.

**Policy outcome:** To assist the target countries in adopting policy changes, the project needs to offer them well-tailored training sessions and support.

**Early planning with governments:** Due to the need for coordination between different government agencies, the approval process in some countries is lengthy, making early planning and discussions with them crucial.

GOOD PRACTICES

**Multi-stakeholder approach:** As the anti-corruption efforts encompass a variety of government parties, the project used a multi-stakeholder approach in targeting its audience. The project involved a wide range of government agencies, enabling beneficiaries to analyse the anti-corruption challenges from various lenses.

**Inter-regional approach:** Connecting countries from various regions with different levels of legal and institutional development added value. It stimulated beneficiaries to learn diverse practices.

**Synergies within UNODC:** As the funding scale of this project was relatively small, the project team established close synergies with another UNODC initiative, the GLOBE Network. These two UNODC projects benefited from this collaboration by expanding their reach at minimal expenses.

**Co-hosting events with national governments:** All project events were organized in partnership with the hosting governments. This resulted in not just smooth logistical arrangements but in a reduction in costs. Such an arrangement also prompted other participating countries to propose co-organizing any potential future event.

**Proactive and inclusive approach by the project team:** Thanks to the proactive strategy, the project staff developed additional outputs with limited financial resources, which were not initially anticipated by the project (e.g., additional webinars and knowledge products). Cost-effective strategies were also used thanks to the proactive approach of the project staff.
I. INTRODUCTION

BACKGROUND AND CONTEXT

OVERALL CONCEPT AND DESIGN

This project is a part of the UNODC’s “Global Programme to prevent and combat corruption through effective implementation of the UNCAC in support of SDG 16” (GLOZ99), which is a technical assistance program aimed at building the capacity of Member States to effectively implement the UNCAC. UNODC launched this project to establish an anti-corruption network of practitioners from countries along the Belt, a land component of the BRI proposed by China in 2013. The network was aimed at enhancing the prevention and combating of corruption in international investment projects through sharing information, experiences and good practices and enlarging international cooperation as well as peer-learning. It intended to reach this objective by launching the anti-corruption network, building capacity, developing knowledge products, creating a knowledge-sharing database and forming a directory of designated focal points, as detailed below:

Table 1. Project logic

<table>
<thead>
<tr>
<th>Objective</th>
<th>Expected accomplishments (EA)</th>
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<tr>
<td>To build and maintain a network for selected developing countries along the Belt to prevent and combat corruption and enhance international cooperation and asset recovery in line with the SDGs, the UNCAC, and the concrete needs of the focus countries, with a view to creating an economic and social environment in promoting and safeguarding the BRI infrastructure investments and successfully achieving the SDGs</td>
<td><strong>EA1:</strong> Enhanced engagement of beneficiary countries through an informal network to identify common regulatory and institutional gaps and to promote the exchange of information, experiences, and best practices in light of prevention and combatting of corruption, international cooperation, and asset recovery, with a view to facilitating BRI cooperation</td>
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<tr>
<td></td>
<td><strong>EA2:</strong> Improved capacity of policymakers, practitioners, and other stakeholders from the beneficiary countries to develop policies, legislation, mechanisms, and institutional framework in mitigating corruption risks and enhancing international cooperation, so as to safeguard the BRI investments</td>
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The project was implemented in close partnership with the Government of China through its National Commission of Supervision (NCS). This agency acted as both the project’s cooperating partner as well as beneficiary. The UNPDF funded the intervention through its 2030 Agenda for Sustainable Development Sub-Fund. The total approved budget was $500,528.18. The project was launched in January 2020 and ended in September 2022.

The project was interregional in scope, encompassing 16 countries along the Belt, including Albania, Armenia, Azerbaijan, Bosnia and Herzegovina (BiH), China, Georgia, Greece, the Islamic Republic of Iran (Iran), Kazakhstan, Kyrgyzstan, Mongolia, Montenegro, Serbia, Tajikistan, Türkiye, and Uzbekistan (see Map 1). The project’s targeted audience included a wide spectrum of government stakeholders such as policymakers, legislators, practitioners working in the national anti-corruption bodies, judicial institutions, law enforcement bodies, public infrastructure and procurement agencies, and a small number of managers from business organizations.
INTRODUCTION

Map 1. Target countries of the project

Source: UNODC, PDF-SDG-2019-02.2-2 Project Document

CONTEXT

Corruption hinders economic growth and social development. The global cost of corruption is 5 per cent of the global gross domestic product (GDP) at around $2.6 trillion. Businesses and individuals pay more than $1 trillion in bribes every year. This redirects the spending toward the wealthy by reducing healthcare, education, and other public welfare spending. As a result, corruption exacerbates inequality and deepens poverty by undermining human development.

Tackling corruption is vital for achieving the SDGs, and in particular, Goal 16 which requires the Member States to “promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels”. To achieve this goal, states have committed to reducing bribery and corruption, developing effective, accountable, and transparent institutions at all levels, and strengthening relevant national institutions. UNCAC, ratified by 189 countries, is the only binding global legal instrument for overcoming corruption. UNODC is the custodian of the UNCAC and supports the Member States in developing strong laws, policies, and capacities against corruption.

The BRI is a development strategy launched by the Chinese government in 2013 to improve regional economic cooperation through better connectivity among countries lying on the ancient Silk Road and beyond. The BRI is labeled the world's largest infrastructure program. However, corruption risks are looming under the initiative as it involves large-scale infrastructure projects which are vulnerable to corruption. Meantime, countries participating in the BRI encounter many challenges in their fight against corruption, such as gaps in the anti-corruption statutory legislation, weak institutional framework, inadequate capacities of anti-corruption and law enforcement agencies, and limited resources.

8 Ibid.
9 https://www.globalgoals.org/goals/16-peace-justice-and-strong-institutions/
Given this context, UNODC launched this project to enhance synergies between promoting sustainable development through the support of UNCAC implementation and mitigating corruption risks in relation to BRI.

PURPOSE AND SCOPE

The evaluation assessed the project in terms of its relevance, coherence, efficiency, effectiveness, impact, and sustainability. As this project is of a pilot nature, the evaluation also looked at the lessons learned and good practices that could be applicable to future similar initiatives of UNODC. The evaluation covered the entire project from its inception in January 2020 to its end in September 2022. The evaluator reached out to the primary project beneficiaries in 16 countries across three regions (Central Asia, South Caucasus, and Southeastern Europe). Beneficiaries from 10 countries—Albania, BiH, China, Iran, Kazakhstan, Kyrgyzstan, Montenegro, Serbia, Türkiye, and Uzbekistan—were available for the interview with the evaluator. The evaluation also analyzed the coordination activities of the UNODC Office in Vienna, Tashkent, and Belgrade. Project trainers, consultants, and external partners based in Europe (France, UK, Serbia, and Russia), North America (USA), and Asia (China) were also interviewed.

No barriers were established to achieve an inclusive and Leave No One Behind (LNOB) approach in the evaluation. The evaluator was open to interviewing all stakeholders, regardless of gender, function in the project (staff, partners, etc.), languages spoken, or disability.

The evaluation findings will be important for UNODC, the primary user of evaluation results, to inform the design of its future projects in this area. The project donor (UNFDF) and the key counterpart (NCS) will also benefit from the evaluation results for maximizing the use of evaluation findings for their similar initiatives.

THE COMPOSITION OF THE EVALUATION TEAM

This independent evaluation was conducted by a female Evaluation Consultant, who has sound experience in both evaluation and the security sector. She has conducted multiple evaluations at the international level (e.g., UNODC, UNICEF, USAID, EC, OSCE, Social Impact, etc.).

EVALUATION METHODOLOGY

APPROACH

The evaluation was conducted in accordance with the standards and norms established by the United Nations Evaluation Group (UNEG) as well as the UNODC’s guidance and procedures. Principals of human rights and gender equality were applied in all stages of this evaluation (project design, data collection, and report writing). In particular, the evaluation examined if the project strengthened the capacity of government actors (the duty bearers) so that they fulfil their international obligations and responsibilities under the UNCAC, the implementation of which has an impact on human rights. At the process level, the evaluation explored to what extent human rights and gender equality were mainstreamed in the project’s activities.

The evaluation employed a summative approach allowing the linking of activities with achievements. This approach helped to analyze the effects of the intervention on the target groups, what the intervention achieved, and how accomplishments were attained. The evaluation was also carried out using a participatory approach when views of key project stakeholders (e.g., project staff) were sought in determining the evaluation design and data collection processes. In addition, the evaluation process was inclusive in nature by focusing on all stakeholder groups: the implementing actor (UNODC), cooperating agency (NCS), beneficiaries (national anti-corruption bodies and other government agencies), partner organizations (WB and Open Contracting Partnership), and project consultants (trainers, authors of manuals, and peer reviewers). In short, the evaluation represented the viewpoints of all project stakeholders, irrespective of their role in the project.
and hierarchical position of respondents. There were no impediments for people with disabilities to take part in the evaluation.

The evaluation was undertaken in line with the principles of independence, impartiality, and transparency.

The evaluation used two data collection methods to address the evaluation questions: a desk review and remote semi-structured interviews with key informants. Using these two tools, the evaluation elicited rich information. Due to the urgency of this evaluation, time constraints, and the extremely low response rate to the previous project’s online survey, the evaluation design centered on these two data collection methods, excluding the online survey. Due to the online nature of the evaluation, other research methods, such as observation or focus group discussions, were not applicable.

The evaluation was structured around seven major criteria: relevance, coherence, efficiency, effectiveness, impact, sustainability, and human rights/gender equality/LNOB. The analysis of each criterion was guided by a set of evaluation questions that intend to explain “the extent to which”, “why”, and “how” specific outcomes have been attained (Annex II). Consideration was given to both expected and unexpected results, with a focus on identifying implementation obstacles that impeded the fulfillment of anticipated objectives. Due to the pilot nature of the project, the evaluation also identified the lessons learned and good practices from the project design and implementation.

**DATA COLLECTION METHODS**

**Desk study:** The evaluator has undertaken a review of all project documentation, including internal and external publications, as well as the post-training assessment surveys completed by 87 participants of four project events (the plenary meeting in Sharm El-Sheikh; 1st regional workshop in Uzbekistan; 2nd regional workshop in Serbia, and 1st webinar). The desk study has allowed the evaluator to get familiar with the project context, objectives, activities, and outputs. Desk research was also refined with information from additional documents gathered during the data collection phase, such as anti-corruption legislation of some participating countries and thematic documents. Besides, the evaluator reviewed the content of 5 knowledge products developed by the project (handbook, guide and reports) and materials posted in an anti-corruption knowledge-sharing database.

**Semi-structured interviews:** The evaluation gathered the opinion of a large number of stakeholders, who represented the entire community of beneficiaries and partners. In particular, the evaluator conducted remote interviews with representatives of all 5 project stakeholders: implementing actor/project staff (i), cooperating partner/NCS (ii), beneficiaries (iii), partner organizations (iv), and consultants (v). The evaluator used a purposive sample to identify the interviewees. In total, 24 interlocutors were interviewed, including 11 beneficiaries from 10 target countries — Albania, China, BiH, Iran, Kazakhstan, Kyrgyzstan, Montenegro, Serbia, Türkiye, and Uzbekistan.

A fair representation of both women and men within the sample was ensured (8 women and 16 men). Interviews were conducted in two languages (English and Russian). The guide for the interviews (Annex II) was translated by the evaluator from English into Russian for Russian-speaking interlocutors. The number of respondents from each stakeholder group is provided in Annex IV.

**DATA ANALYSIS**

Special attention was paid to ensuring unbiased and objective findings. The robustness of the evaluation methodology was ensured by triangulation of different sources of information: secondary data (desk review) and primary sources (KIIs). For KIIs, *thematic analysis* was used that helped to identify the patterns in meaning across the data to derive the most prevailing themes, issues, and problems. The evaluator used *content analysis* to assess publications (manuals and guides). Whenever possible, the evaluator also used the rating system reflecting the assessment, based on qualitatively collected data from KIIs. This rating system is based on a qualitative scale; therefore, results are to be regarded as an indicative evaluation of quality of
achieved results. The evaluator then drafted the conclusions to the key evaluation questions and provided a set of lessons learned, good practices, and recommendations.

**LIMITATIONS TO THE EVALUATION**

The following table highlights the key constraints encountered by the evaluator and the measures employed to overcome them:

<table>
<thead>
<tr>
<th>Limitations to the evaluation</th>
<th>Mitigation measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limited time/Time constraints</td>
<td>The evaluator closely worked with the project staff to proactively identify the key resource interlocutors. Evaluator also focused on the most relevant issues for UNODC. She was provided by the project team with easy access to all necessary project documents.</td>
</tr>
<tr>
<td>Unavailability of government stakeholders for interviews</td>
<td>Government officials typically have a busy schedule. The evaluator repeatedly contacted them by offering flexibility in terms of timing (accommodating different time zones) and languages (Russian and English). Evaluator also agreed to receive a written response from government interlocutor in Mongolia.</td>
</tr>
<tr>
<td>A large number of target countries with distinct context</td>
<td>The evaluator offered stakeholders from the same country (e.g., Uzbekistan and Serbia) the flexibility of having a group interview instead of individual KIlS</td>
</tr>
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</table>
II. EVALUATION FINDINGS

RELEVANCE

EVALUATION QUESTION:
To what extent has the project been relevant to stakeholders’ needs and priorities (e.g. Member States, etc.)?

The evaluation assessed the project alignment with the needs and priorities of the Member States participating in the project as well as a global framework of SDGs.

Finding 1. The project was relevant to the needs and priorities of the beneficiary countries.

Sixteen countries participated in this project. The evaluation found that the project was relevant to their needs. In particular, all 11 respondents (100 per cent) from 10 target countries indicated the alignment of project activities with the priorities of recipient countries.

Figure 1. Project relevance to the priorities of target countries, (Source: indicative judgement based on KIs)

First, the project was responsive to their priorities in terms of more effective implementation of the UNCAC and improving their national anti-corruption policies and practices, as stated by the beneficiaries. All 16 target countries ratified UNCAC and have been implementing it. They have undergone the first cycle of the UNCAC’s Implementation Review Mechanism (IRM), while several of them are in the midst of the second cycle. The IRM is a peer review process designed to assist Member States in effectively implementing the UNCAC. This mechanism assists them in identifying the existing gaps in their anti-corruption policies, institutional barriers in implementing the UNCAC, and the specific needs for technical assistance to effectively put into practice this convention. Pursuant to the IRM’s findings, Member States encountered such difficulties as ineffective anti-corruption legislation and policies, insufficient enforcement of anti-corruption regulations, resource constraints, inadequate capacity, and limited expertise on the new techniques for prevention, investigation, and combatting corruption. To address these obstacles, the project design centred on improving the national anti-corruption policies and practices, capacity building, development of knowledge products, and enhancing the expertise of anti-corruption practitioners in new investigative and preventative approaches. The project also focused on creating the Anti-Corruption Network of Practitioners so that its members share their expertise, experiences, and good practices for preventing and combating corruption.

Overall, the project design was based on evidence, i.e. the IRM findings. Besides, the Chinese government, a donor of UNPFD, a project cooperating partner, and a beneficiary, was closely consulted in the course of project implementation to better address its anti-corruption priorities in relation to the BRI investment.
projects. Other national governments were also involved in shaping the project directions by participating in the official launch event organized by the project in December 2019 during the 8th Session of the Conference of States Parties to UNCAC in Abu-Dhabi. During this event, the project concept was presented to the target countries, and their feedback was taken into account during the project implementation.

According to the evaluation findings, the topic of corruption in large infrastructure projects, inter alia the BRI’s projects, was important for the beneficiary countries since it was a new domain for most of them or they had limited knowledge in this field. From the thematic perspective, it was the first project ever undertaken by an international organization with a specific focus on corruption prevention in the BRI’s investment projects. In this regard, UNODC was applauded both by partner organizations and beneficiaries for launching the project despite the newly emerged political sensitivity over the BRI which may hinder the participation of some target countries.

Based on the evidence collected for this evaluation, the project greatly served the interests of the target Member States in terms of strengthening the capacity of their anti-corruption practitioners. The prevailing majority of respondents from 11 recipient countries (10 out of 11 respondents, or 90.9 per cent) emphasized that the project’s workshops held in Uzbekistan and Serbia and the plenary meeting in Sharm El-Sheikh broadened their knowledge in anti-corruption strategies in international investment projects. Before these training sessions, the topic of corruption risks in international investment projects was unfamiliar to nearly half of the respondents. The beneficiaries also indicated that training sessions on the advanced investigative (forensic) methods and corruption risk assessment of international investment projects were of high importance to them.

Moreover, the Anti-Corruption Network of Practitioners was found to be highly relevant to them. Before this project, there was no such inter-regional anti-corruption network connecting Central Asia, South Caucasus, and Southeast Europe. Other networks concentrated separately on Balkan nations (e.g., the Western Balkans Prosecutors’ Network or Regional Anti-corruption Initiative) or Central Asia and the Caucasus (e.g., the Commonwealth of Independent States’ Interstate Anticorruption Council). They did not focus on corruption in international investment projects. They were also meant mostly for law enforcement bodies, but not justice ministries, procurement agencies, and preventive anti-corruption bodies, who are currently members of the Anti-Corruption Network.

The project objectives were also aligned with the national strategies and policies. For instance, the project is pertinent to the Beijing Initiative for the Clean Silk Road announced at the 2nd Belt and Road Forum for International Cooperation in 2019. This initiative calls for safeguarding the BRI’s development in the spirit of the UNCAC and international norms. It also urges the state-owned companies to establish a corporate compliance management system, which was the project’s focus as well. The project was relevant to Uzbekistan’s State Anti-Corruption Program for 2021-2022 and the curriculum of the Academy of General Prosecutor’s Office, which is developing a new course on integrity. In BiH, the project was congruent with the goals of the Guidelines for Development and Implementation of Integrity Plans in the BiH institutions, an anti-corruption tool used by every government institution there. In Kyrgyzstan, the project was pertinent to the recent President’s Decree on Measures to Improve the Foreign Investments Governance System.
Finding 2. The project was aligned with global instruments and strategies such as the SDGs

In addition to the UNCAC, the project was directly aligned with the SDG. The intervention was aimed at assisting the target countries in achieving SDG 16. This goal requires States to address the scourge of corruption. Based on the evidence collected for this evaluation, the project the project played an important role in contributing to the attainment of the following sub-goals, as demonstrated by the analysis of project documents and KIs:

- **SDG16.4**: By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets, and combat all forms of organized crime;
- **SDG16.5**: Substantially reduce corruption and bribery in all their forms;
- **SDG16.6**: 16.6 Develop effective, accountable, and transparent institutions at all levels;
- **SDG16.7**: 16.7 Ensure responsive, inclusive, participatory, and representative decision-making at all levels;
- **SDG16.10**: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements;
- **SDG16.A**: Strengthen relevant national institutions, including through international cooperation, for building capacity at all levels, in particular in developing countries, to prevent violence and combat terrorism and crime.

Around half of the interviewees from the target countries reported that the project activities (e.g., capacity-building events and knowledge products) were linked to and contributed to the achievement of the aforementioned SDG sub-goals. It is noteworthy to mention that some of the government agencies targeted by the project and interviewed by the evaluator (such as the General Prosecutor’s Office in Uzbekistan) were the national focal point for the implementation of SDG16 and its sub-goals.

Finding 3: The project design was appropriate to meet the anticipated results. There was a strong connection between the project objective, outcomes, and outputs. As the policy change is a complex process, it was a right decision of the project to reduce the number of countries adopting the policy guide from 4 to 2.

The project design was appropriate to meet the envisaged objective and outcomes. There were causal relationships between the project outputs, expected accomplishments, and activities. The defined output indicators were specific, measurable, attainable, action-oriented, and time-bound.

It is noteworthy to remark that the indicator of achievement 2.1 (IA 2.1), which was initially defined as ‘4 beneficiary countries adopt or in a process of adopting policy guidance on addressing corruption risks and promoting international cooperation in the BRI context’ was revised in the course of project implementation.

Given the short duration of this project, but the extensive policy-making process, it was an ambitious indicator to initially set up. This judgment was made by the evaluator based on the responses of beneficiaries regarding whether their countries have adopted or are in the process of developing policies to address corruption risks, following participation in the project. Out of 10 countries, only 2 (BiH and Uzbekistan) were revising their policy framework. Representatives from 4 countries remarked that the project duration was short for changing policies. Policymaking is a lengthy process as it takes time to draft, lobby, and adopt policies. Beneficiaries from 2 countries stated that the project’s expectations about policy changes were not clearly communicated to them. It should have been stated more clearly to the beneficiaries what the project expected of them in terms of policy change. In addition, beneficiaries from 2 countries noted that the number of project activities (1 plenary meeting and 2 workshops) was still limited to gain sufficient capacity and information to revise their policies.

The responsibility for promoting policy changes lies within governments that the project cannot control. Therefore, reducing the number of countries adopting the policy guide from 4 to 2 was the proper project decision.

As enactment of policies is the function of government, but not of the project, it is necessary to carefully formulate the policy outcomes. The project can only assist in drafting bills, making recommendations,
developing action plans, or monitoring policies. In the future, it is recommended the policy outcomes be rather formulated as ‘assisting’ or ‘contributing’ to improving policies.

EFFICIENCY

EVALUATION QUESTION:
To what extent has the project delivered outputs in a timely and efficient manner?

Finding 4. The project succeeded well in adjusting its interventions to respond to COVID-19 and emerging needs of participating countries. Despite some delays caused by pandemic, the project implemented its activities by shifting priorities among project components

The project duration was initially 1 year, starting in January 2020 and ending in December 2020. However, the project was hit by the global COVID-19 pandemic, which significantly delayed the project’s implementation. The project commenced right as this global pandemic began. Due to COVID-19, the project’s first activity, the launch of the Anti-Corruption Network of Practitioners, initially scheduled for early 2020, had to be postponed. This event was delayed for one year and a half, from May 2020 to December 2021. The project team sought offline (physical) participation from beneficiaries (network members) in order to build trust between them. Such a tactic was justifiable as trust is the key element in partnership building.

Due to the pandemic, the project duration was extended three times at no cost until September 2022. To respond to the COVID-19 travel restrictions, the project revised its workplan by shifting the implementation priority from workshops to the development of anti-corruption manuals and an anti-corruption knowledge-sharing database. In addition, the project introduced the following changes that could not take place due to COVID-19:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Changes</th>
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<tbody>
<tr>
<td>A2.1 Organize one plenary training workshop for 2 days for 40 sponsored government officials and back to back with the plenary meeting to discuss thematic topics with a common interest in relation to the prevention/combatting of corruption, including by taking into account relevant results of their participation in the IRM.</td>
<td>Cancelled. This event was scheduled to take place immediately following the plenary meeting (launch of the network) in order to save the travel expenses of participants. Both events were planned to be held in Beijing, China. The activity was replaced by the regional workshops described below. Nevertheless, the first plenary meeting in Sharm el-Sheikh had some training components delivered by guest speakers and experts invited to deliver presentations on various relevant topics.</td>
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<tr>
<td>A2.2 Organize one national workshop (3 days with 30 sponsored government officials and private sector representatives each) to discuss corruption risks linked to BRI, especially regarding infrastructure projects and relevant public procurement and regulatory issues.</td>
<td>Two regional workshops were organized in line with the revised workplan; the second workshop was funded from the budget line meant for A2.1 above. One regional workshop was held in Samarkand, Uzbekistan, and another in Belgrade, Serbia.</td>
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</table>

The delays caused by COVID-19 had one major repercussion. The time gap between the official launch of the project in Abu-Dhabi in December 2019 and the next offline event organized two years later in December 2021, when the Anti-Corruption Network was launched, was substantial. This did not stimulate close communication between target countries during this period, as mentioned by interviewees from 4 target countries. Beneficiaries from 5 countries stated that they perceived project activities to be somewhat fragmented and lacking intensity.
In addition to the pandemic, the lengthy internal clearance (approval) process required by some of the sixteen countries had slowed down the development of publications, as revealed by the desk review. The project needed to collect comments from target countries to finalize its knowledge products (e.g., “Addressing Corruption and Fraud in International Infrastructure Projects”). Internal procedures of some governments necessitated inter-agency consultations, including the MFA, which was a mandatory requirement, but time-consuming. These delays did not affect the project’s effectiveness, but it took time for the project to finalize its knowledge products.

As a whole, the project was able to adjust its activities to respond to the impact of COVID-19 and emerging needs of participating countries, as determined through a review of project documents and KII with the project staff. Despite delays, the project delivered all quality outputs (or are planned to be delivered soon).

**Finding 5. The project delivered its outputs in an efficient way. The project was successful and proactive in using the cost-effective strategies, resulting in cost savings. The cross-regional mode of the project was beneficial for target countries, but some of them offered parallel activities focusing on the national needs**

Re-programming (workplan revision) had no implications on the overall budget while the project efficiently re-allocated resources between its budget lines. For example, staff and personnel costs increased while travel and contractual services decreased. As of September 2022, the project had used almost all of its allocated funds at a utilization rate of 96.8%. The project team was proactive in using external resources to deliver three additional online training sessions to the target countries using the resources of the Globe Network run by the UNODC. These three webinars were not initially foreseen by the project.

According to all beneficiaries and project staff, the number of target countries (16) participating in the project was optimal for achieving the project results. Despite the limited financial resources, COVID-19, and global geopolitical tensions around the BRI, the project succeeded in attracting 16 countries to participate in its activities. These countries came from three regions never linked before via an anti-corruption network. The inter-regional approach of the project was seen by the prevailing majority of interviewed beneficiaries as a benefit since it enabled them to both expand their geographic reach and learn varying practices. Nonetheless, some countries (3 countries) expressed the need for additional parallel interventions focusing on national needs to assist them in putting into practice the newly learned practices and processes.

The project successfully exploited cost-effective strategies, which led to cost savings. All project events (two launching events and two regional workshops) were organized in close partnership with the governments hosting the events. This resulted in not just smooth logistical arrangements but, in some cases, a reduction in costs. For example, the first plenary meeting was held in Sharm el-Sheikh as a pre-event to the 9th Session of the Conference of the States Parties to UNCAC. Thanks to this arrangement, conference venues were used free of charge, and discounts for meals were provided by the Egyptian government. Simultaneously, as the launching ceremonies for the project in Abu-Dhabi and the network in Sharm el-Sheikh were staged as special events of the Conference of the States Parties to UNCAC, this raised the calibre of their participants. High-level government officials, such as the heads of anti-corruption agencies of Armenia, Mongolia, Montenegro, and Tajikistan, and the First Deputy Prosecutor General of Kyrgyzstan, attended these gatherings.

Overall, based on the above analysis, the following summative assessment can be made: the project’s efficiency in terms of delivering outputs in a timely manner is rated as satisfactory. The project’s efficiency in implementing activities in a cost-effective way is regarded as highly satisfactory.

**COHERENCE**

**EVALUATION QUESTION:**

To what extent the planned activities were in line with the logical framework, coherent and realistic?
Finding 6. The multi-stakeholder and multi-disciplinary approach exploited by the project provided a proper framework to examining the anti-corruption strategies from various angles. It also assisted the project to target a wide range of anti-corruption practitioners.

The UNODC’s role as custodian of the UNCAC laid the groundwork for the project. The project outcomes and outputs were in line with UNCAC. As this project is a part of the Global Programme (GLOZ99), there were also close linkages between this program and the project. In particular, the project interventions were coherent with the four work streams of GLOZ99:

- Legal and institutional frameworks;
- Human and organizational capacity;
- Knowledge products;
- Political will to support the UNCAC’s implementation.

The advantage of the project design was that it was built on the multi-stakeholder approach. As the anti-corruption strategy encompasses a variety of government actors, it was the right tactic of the project to exploit a multi-stakeholder and multi-disciplinary approach in targeting its audience, not only law enforcement bodies. In fact, the project worked with a diversified group of beneficiaries from the national governments, such as policymakers, lawmakers, practitioners working in the national anti-corruption bodies, judicial institutions, law enforcement bodies, public infrastructure and procurement agencies, and managers of business institutions. Thus, the project promoted a holistic approach to tackling anti-corruption issues. Such a multi-stakeholder approach was applauded by the project stakeholders (beneficiaries, cooperating partners, and partner organizations).

For instance, 81% of respondents from the target countries supported the participation of a broad spectrum of stakeholders in the project activities. This strategy allowed beneficiaries to analyse anti-corruption challenges from various perspectives.

Figure 2. Coherence of the project’s multi-stakeholder approach, (Source: indicative judgment based on KII)

This approach also enabled actors from different institutions (justice, prosecution, procurement, anti-corruption, etc.) to establish contacts. For instance, following the workshop in Belgrade, the Serbian law enforcement, anti-corruption, and procurement agencies built cooperative relationships.

Finding 7. To implement its activities, the project closely collaborated with a diverse group of external partners. Cooperation with the Chinese government was effective. The project closely worked with the field offices of UNODC in Tashkent and Belgrade which contributed to the project’s efficiency and effectiveness.

To implement this project, UNODC closely cooperated with its Chinese cooperating partner, the NCS. A Memorandum of Understanding on Cooperation in Combating Corruption signed between the UNODC and the NCS in 2019 created the foundation for collaboration between these two parties. In the Memorandum, “building cooperation on relevant areas under the BRI” was defined as one of the key areas for collaboration. The project was in close contact with the NCS to jointly coordinate the project activities. The NCS also supported the project in terms of its expertise, advice, and stewardship. According to the interview with the Chinese side, future joint anti-corruption initiatives between the UNODC and the Chinese government will benefit from the experience developed throughout the implementation of this project.
To achieve its objectives, the project also cooperated with external partner organizations such as WB and AIIB. Among CSOs, the project collaborated with the Open Contracting Partnership, a non-profit organization based in USA. These partner organizations participated as lecturers (presenters) during the project’s plenary meeting in Sharm El-Sheikh in December 2021. They also provided their feedback (comments) on the knowledge products by acting as peer-reviewers. The field research revealed that these partners are eager to cooperate further with the UNODC, while the partnership established within the project would be a solid base for it. As BRI is a large-scale international initiative, UNODC can further expand its cooperation with these and other partner organizations in addressing corruption issues in BRI.

As a whole, the project did not duplicate initiatives of other donors and governments in target countries in the field of preventing and combatting corruption in the BRI’s international investment projects. All interviewees mentioned that the project was the first intervention by an international organization working in this field in their countries. The project was a pioneering initiative, and its experience will be important for future initiatives of UNODC, the NCS, and target countries.

Furthermore, the project closely cooperated with the UNODC’s regional and programme offices in Tashkent, Uzbekistan, and Belgrade, Serbia. There was one project assistant employed in each of these offices. They provided administrative, logistical as well as programmatic support for project activities conducted in the field. In addition, they assisted in developing synergies between the intervention and UNODC regional projects. For instance, in Tashkent, the project assistant provided one of the workshop trainers with relevant research findings and publications produced by the UNODC Regional Office for Central Asia. The latter integrated them into his training materials delivered to the participants and subsequently prepared a background study under the project.

The project also created strong synergies with the GlobE Network. The project, in partnership with the GlobE, organized three online knowledge sessions, which were co-funded by these two projects. Two sessions were devoted to forensic audit techniques and forensic analytics in detecting corruption in international investment projects. The third session focused on the use of TRACK and other UNODC online anti-corruption tools and resources. These webinars attracted a high number of participants from the national anti-corruption authorities. For instance, the first online training session was attended by 141 people, and nearly 90 participants took part in the second webinar.

EFFECTIVENESS

**EVALUATION QUESTION:**
To what extent did the project achieve its intended outcomes and objective?

*Finding 8: The project achieved all five of its targeted outcome indicators. Under the first expected accomplishment, the Anti-Corruption Network was created and comprised members from 16 countries. Yet, the network’s sustainability is an issue. The project produced a larger quantity of knowledge products than anticipated. Instead of two publications, five guides were produced. Given the limited number of existing publications on the corruption in infrastructure projects, the project filled the void. Dissemination and presentation of these publications were not foreseen by the project design but need to be delivered to reach a wider audience. The project also created a knowledge-sharing database that is the first systemized knowledge-sharing tool.*

Despite COVID-19, the project was effective in achieving its outcomes, which in turn contributed to the attainment of the overall objective. The project implemented all of its activities in line with the revised
workplan. Based on the project progress reports and field research, the level of achievement for each indicator was identified by the evaluator as follows:

Table 2. Review of performance indicators

<table>
<thead>
<tr>
<th>Expected Accomplishment (EA)</th>
<th>Indicator of achievement set by the project (IA)</th>
<th>Level of achievement</th>
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<tbody>
<tr>
<td><strong>EA1:</strong> Enhanced engagement of beneficiary countries through an informal network to identify common regulatory and institutional gaps and to promote the exchange of information, experiences, and best practices in light of prevention and combatting of corruption, international cooperation, and asset recovery, with a view to facilitating BRI cooperation</td>
<td><strong>IA 1.1</strong> Establishment of a fully functional network for the focus countries to promote coordination, peer-learning, and sharing of good practices relevant to the fight against corruption pertaining to the BRI cooperation</td>
<td>Achieved, but the sustainability of the network is an issue.</td>
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<td></td>
<td><strong>IA 1.2</strong> Development of two comprehensive manuals in the framework of the network regarding prevention, countering corruption, international cooperation, and asset recovery in the BRI context, and making it available to the policymakers and practitioners in all the participating countries</td>
<td>Achieved. These two publications are now being edited and cleared for release. The evaluator was given access to the draft guides. Three additional knowledge products were developed by the project.</td>
</tr>
<tr>
<td></td>
<td><strong>IA 1.3</strong> Development of a knowledge-sharing database in the framework of the network regarding prevention, countering corruption, international cooperation, and asset recovery in the BRI context, and making it available to the policymakers and practitioners in all the participating countries</td>
<td>Achieved, but the legal acts from beneficiary countries still need to be collected.</td>
</tr>
<tr>
<td><strong>EA2:</strong> Improved capacity of policymakers, practitioners, and other stakeholders from the beneficiary countries to develop policies, legislation, mechanisms, and institutional framework in mitigating corruption risks and enhancing international cooperation so as to promote and safeguard the BRI investments</td>
<td><strong>IA 2.1:</strong> 2 out of 16 beneficiary countries adopt or are in the process of adopting policy guidance on addressing corruption risks and promoting international cooperation in the BRI context due to their enhanced knowledge and capacities through the training workshops</td>
<td>Achieved. Uzbekistan and BiH are in the process of developing policy changes.</td>
</tr>
<tr>
<td></td>
<td><strong>IA 2.2:</strong> Development of a directory for designated focal points under this network and Terms of Reference (ToR) for the secure communication system should be established.</td>
<td>Achieved.</td>
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</table>

Under the first expected accomplishment (EA1), the project achieved all three of the outcome indicators (IA 1.1, 1.2 and 1.3) with details given below:

**IA 1.1:** The indicator was met. The Anti-Corruption Network of Practitioners was officially launched at the plenary meeting in Sharm el-Sheikh in December 2021. The premise of the project was that anti-corruption
work would not be successful without the involvement of all interested government parties. Therefore, the project targeted a wide range of government agencies. In order to facilitate communication and networking among the members, the project organized the plenary meeting in Sharm el-Sheikh as well as two regional workshops in Samarkand in May 2022 and Belgrade in June 2022. Some participants (e.g., Chinese counterparts) attended these events virtually due to the COVID-19 travel restrictions in their countries. During the field research, all target countries stressed the importance of having this network for learning new expertise and good practices. This is because the topic of anti-corruption in international investment projects, particularly in large infrastructure projects, is still new for many of these countries. They lack effective legislation and sound expertise in this sphere. Thus, this network was necessary in enlarging their knowledge.

Yet, not all interviewed members of the network keep active communication with each other. On one side, it has been just four to five months since these two regional workshops took place and thus, active interaction has not started yet. On the other side, according to the interviewees, there were three offline events (1 plenary meeting and 2 regional workshops) organized for networking, but different people from the target countries attended them. When new participants take part, this does not promote close networking. Those, who attended only one event, mentioned that the number of project events was still limited for them to establish a close network with other members. They were interested in being exposed to the project activities more intensively.

In addition, some of the interviewees stated that their countries still lack good practices to share with others as the topic is still new to them. Therefore, they had little to share within the network. In light of this, they have so far acted as recipients of information than as providers. Beneficiaries also noted that the network was in need of more active facilitation from the project’s side to keep its members attached and engaged (e.g., sending newsletters, initiating online discussions, etc.).

The network has the potential to grow by attracting new countries to join it, but its sustainability is a challenge. UNODC is well placed to further support this network given its past experience with network coordination and facilitation (e.g., GLOBE, Anti-Terrorism Regional/Central Asian Network, etc.). Government interlocutors from all 10 countries expressed their high demand for this network. They have an interest in further strengthening their capacity by attending thematic workshops. To keep this network functional, they proposed to organize annual meetings, which some of the target countries are ready to co-host (e.g., Kazakhstan).

IA 1.2: The project met fully this indicator. It developed two manuals, “Integrity in International Investment Projects: Good Practices, New Perspectives”, and “Towards Building a Road of Integrity: Perspectives of Business Integrity and Compliance” (prepared in English and Chinese). Their outline was consulted with the Chinese government, which also provided comments on their content. These knowledge products were subject to a thorough peer review from experts and representatives of international organizations (IOs). According to the interviewed peer-reviewers, not many IOs focus on and produce knowledge products concerning anti-corruption in investment projects, particularly on BRI. For instance, the second handbook produced by the project is one of the first publications on business integrity in the BRI’s investment projects. In addition, previous publications did not cover the multi-jurisdictional aspect of anti-corruption in the infrastructure sector nor addressed the issues from the perspective of UNCAC. Hence, these two manuals produced by the project filled the gap.

For Chinese companies, investing in the BRI and implementing relevant projects is a demanding topic and more and more companies are interested in it. Hence, the project’s handbook on business integrity was a timely deliverable and is intended to be used by BRI participating businesses, in particular Chinese companies, according to one of the interlocutors. It was also mentioned during the field research that around ten years ago, not many Chinese companies, aside from foreign investors, were aware of the business compliance principles. To date, private companies are changing their attitude. Therefore, this handbook will be a good reference for Chinese enterprises, as noted by the interlocutors.
As these publications are too extensive in terms of pages, their important data might be visualized to make them more appealing to a broad variety of readers, including the business community. Additionally, these publications could be accompanied by brief summaries.

The project also developed three additional knowledge products as follows:

(i) Analytical paper “Countering Corruption in Investment Projects: Available Solutions and Further Directions” prepared as an outcome document of the Samarkand workshop (prepared in English and Russian);

(ii) Facilitator’s guide “Sectoral Corruption Risk Assessment in International Investment Projects” (with working translation available in Russian) prepared as an outcome of the Belgrade workshop, and

(iii) Background study “Addressing Corruption and Fraud in International Infrastructure Projects” (with work in translation available in Russian) is designed to explain the most common corruption schemes in international infrastructure projects, measures to prevent and detect those schemes. It also lists indicators of corruption and fraudulent schemes and provides guidance on the investigation of corruption offences.

Given the limited number of existing publications on corruption in international investment projects, the development of these three additional knowledge products was an added value. This demonstrates the proactive approach taken by the project team.

Due to the fact that the final versions of the knowledge products were not yet distributed to the target nations (only draft copies of a few publications were supplied to them for feedback), only 2 out of 10 countries used them thus far.

The project design did not envisage events for the presentation and dissemination of the final versions of the publications. Yet, the project staff is planning to possibly present the publications at the events commemorating the BRI’s 10th anniversary next year. Interlocutors advised accompanying the dissemination with online presentations for target countries and possible translation of publications into local languages in order to increase readership. The NCS is planning to translate the manuals into Chinese. Besides, the NCS is intending to distribute these publications to the Chinese private companies via its internal workshops and events. Additionally, it will request other government agencies overseeing investments to distribute the manuals among the Chinese companies.

IA 1.3: The project reached this outcome indicator. An anti-corruption knowledge-sharing database was created by the project. The UNODC Anti-Corruption Portal (TRACK) was used to create the database and is accessible for public use, including policymakers. The database now contains guides, manuals, and other publications produced by IOs and CSOs on integrity, managing public investments, public procurement, infrastructure management, and other topics related to the project focus areas. In fact, there was no such systemized knowledge-sharing database before. In this regard, the database presents the first collection of international, and national knowledge products as well as legal instruments and standards in a single location.

As of November 2022, legal resources from not all beneficiary countries were posted in the database. The target countries need to be followed up (12 out 16 countries responded to the request and provided their domestic legislation), or their legal acts could be retrieved from the Internet.

Finding 9: Under the second expected accomplishment (EA2), the project reached all two of the outcome indicators. Two out of sixteen target countries are in the process of developing and adopting new anti-corruption policies. The project developed a directory of designated focal points under this network and

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elaborated the ToR for secure communication of network members. The directory needs to be regularly updated and sent to the members before the end of the project.

IA 2.1: To assist the target countries both in adopting the policy guidance on addressing corruption risks and establishing networking, the project conducted two workshops. The first two-day workshop was organized in May 2022 in Samarkand and focused on the priorities of countries in Central Asia and the South Caucasus. It was attended by 55 experts from 13 countries. According to the post-training assessments conducted by the project, the prevailing majority of participants highly appraised the workshop. In particular, 76 per cent of respondents assessed the workshop as excellent, while the remaining 24 per cent rated it as good. No one rated the event as average or below average.

Figure 3. Overall assessment of the workshop in Samarkand, May 2022 (%)

![Graph showing the distribution of responses.]

Source: post-training assessment surveys

Moreover, 60 per cent of respondents ranked the workshop themes and presentations made at this event as excellent, while 28 per cent valued them as good. No one ranked the seminar as average or below average. According to these statistics, participants regarded this workshop to be useful and accommodating to their needs.

Figure 4. Assessment of the workshop themes and presentations, Samarkand, May 2022 (%)

![Graph showing the distribution of responses.]

Source: post-training assessment surveys

The second workshop was held in June 2022 in Belgrade, Serbia with a focus on countries in Southeast Europe. It was attended by 44 participants from 14 countries. According to the interviews with the target countries, they all supported the project’s idea to separate the workshops based on regional specificities (Central Asia/South Caucasus and Southeast Europe). These regions (e.g., Central Asia and South Caucasus) share a similar institutional and legislative background. This enabled participants to address anti-corruption issues within a comparable environment. According to the post-training assessments, the prevailing majority of participants, at 88 per cent, assessed the workshop as excellent, while 12 per cent rated it as good. There was no participant who ranked this workshop as average or below average. The same number of participants (88 per cent and 12 per cent) ranked the quality of presentations as excellent and good, respectively.
EVALUATION FINDINGS

Figure 5. Overall assessment of the workshop and rating of themes and presentations, Belgrade, June 2022, (%)

Source: post-training assessment surveys

The prevailing majority of beneficiaries (10 out of 11, or 90.9 per cent) indicated that the trainings enhanced their capacity in anti-corruption strategies and techniques. KIls revealed that nearly a half of beneficiaries did not know much about the anti-corruption measures in the large international investment projects, particularly in BRI projects. These workshops helped them in gaining an overall picture of the corruption loopholes in international investment projects. KIls also demonstrated the applicability of the new knowledge in target countries. For example, the risk assessment elements of infrastructure projects are now being used in Albania, Montenegro, and Serbia.

According to the field research, the capacities enhanced through the training workshops resulted in the process of revising policies in two target countries. Uzbekistan is currently exploring steps to minimize investment risks. In addition, it is also promoting the compliance system in the business sector, and developing a new Anti-Corruption State Program for 2023-2024. As a result of the new knowledge gained, the project participants have submitted their ideas to be incorporated into these three policies. Moreover, the Academy of General Prosecutor’s Office in Uzbekistan, a training institution, is designing a new course on integrity in the public sector. The workshop participants used the new information gained from the workshops in the development of this new course.

In Bosnia and Herzegovina (BiH), the new Anti-Corruption Strategy was drafted. A government agency targeted by the project was in charge of the development of the Action Plan for this strategy, while the workshop participants used their newly acquired knowledge for drafting this plan. Both the anti-corruption strategy and its action plan are still to be approved.

IA 2.2: The project attained this outcome indicator. A directory of designated focal points from the target countries was created and uploaded in the form of an encrypted list to the UNODC TRACK portal. Moreover, the project hired a consultant, who developed a comprehensive ToR (Technical Specification) for creating a secure communication platform for interaction of the network members. Based on this TOR, the project team decided that the online practitioners’ forum with restricted access would be the best option for the member of the network to communicate with each other. According to the feedback received from beneficiaries, this directory needs to be regularly updated as some government officers (project participants) might have left their jobs. Interviewees also requested the project to send out the updated version of the directory to all members before the end of the project.

EVALUATION FINDINGS

IMPACT

EVALUATION QUESTION:
To what extent has the project generated or is expected to generate significant positive or negative, intended or unintended, higher-level effects?

Finding 10: The project brought the topic of corruption in international investment projects to the attention of law enforcement agencies in numerous target countries. This sector is now on the radar of anti-corruption practitioners. This intervention also raised awareness of beneficiaries of corruption loopholes in investment projects and increased their capacity to tackle them. Despite politization, this project paved the way for other international players to address corruption challenges in BRI projects. Moreover, project beneficiaries from 16 countries established contacts through the Anti-Corruption Network.

Due to the limited project scope, it is too early to assess the long-term project impact. Nevertheless, there were still immediate effects made by the project. One of them was that the beneficiaries raised their awareness of corruption loopholes in international investment projects. They also learned the new strategies and techniques to address them. Before the project, many practitioners, particularly those in law enforcement, were unfamiliar with procurement cycles in investment projects, corruptive practices within them and anti-corruption measures to tackle them. They now understand how investment projects are implemented, what anti-corruption tactics are used, and what best practices exist. Law enforcement bodies shifted their priority to this sector. Awareness-raising is the main and concrete effect that the project has made.

The enhanced capacity of anti-corruption practitioners is another positive benefit. Project participants learned new investigative and forensic methods for mitigating corruption risks in infrastructure projects. Six countries (Albania, BiH, Kyrgyzstan, Montenegro, Serbia, and Uzbekistan) have already applied the new knowledge they gained through the project’s capacity-building activities (e.g., BiH and Uzbekistan for the policy revision). Three of these member states (Albania, Montenegro, and Serbia) have used the risk assessment elements of infrastructure projects in their practices.

As a long-term effect, the project intended to improve the implementation of UNCAC and assist the target countries in establishing more effective regulatory frameworks. In this light, the project contributed to revisiting the regulatory frameworks in two target countries (BiH and Uzbekistan).

Establishing international contacts through the Anti-Corruption Network is another tangible effect of the project. Beneficiaries have created networks with their peers from 16 countries in order to share their good practices and expertise. Such an anti-corruption network linking three regions was not in existence before.

SUSTAINABILITY

EVALUATION QUESTION:
To what extent are the benefits of the projects likely to continue after it ends?

Finding 11: Without further support, sustainability of the Anti-Corruption Network of Practitioners is questionable, and UNODC (Convention Support Section) has a plan to support the network. The project’s exit strategy changed over the course of project implementation primarily due to the geopolitical factors. Capacity of a large number of anti-corruption practitioners was enhanced, and thus, it is reasonable to expect that a
great part of these beneficiaries will continue using the new skills. Due to the inter-regional nature of this project, local ownership development was not the focus of the project. The knowledge-sharing database, along with knowledge products, represents the sustainable part of this intervention.

The project was implemented in close partnership with the Government of China through its National Commission of Supervision (NCS). The project marked the start of NCS cooperation with UNODC within the framework of a jointly signed Memorandum of Understanding. The NCS was closely involved in project planning and implementation at all stages. Such an active engagement contributed to gaining an invaluable experience by the NCS in implementing the inter-regional anti-corruption projects. The NCS is going to transfer the experience from this project implementation to its future projects. As this project was inter-regional in nature and did not work directly with the national government agencies over the project execution, except the Chinese government, the local ownership was immaterial.

This project’s least sustainable component is the Anti-Corruption Network of Practitioners. The network cannot function without further support of UNODC. The problem is that not all target countries keep close communication with their peers from other countries and are not yet actively sharing their expertise via the network. The project’s exit strategy for the project changed over the course of the project implementation. According to the project document, the initial exit strategy was to attach this network to the Belt and Road Forum for International Cooperation. Nonetheless, due to the changes in geopolitics and funds availability, UNODC decided to maintain the network itself instead of transferring it to the target country. UNODC now has a plan to support it with its other internal resources. Regardless of funding sources, the network needs further assistance, especially facilitation, whereas the interest of beneficiary countries in this network is considerable. It is necessary to note the project’s exit strategy and its alteration was not clearly articulated in the project documentation.

To support the network, UNODC can organize annual meetings or form a secretariat. Since capacity-building activities are also in high demand in the target countries, the network might continue delivering them. UNODC can further develop this network by also concentrating on other challenges related to corruption, such as asset recovery or preventing money laundering. In addition, the network could be expanded to include the new countries along BRI. If the network is further supported, it could also assist on a pilot basis those countries (champions), which are ready to reform their regulatory and institutional frameworks. In this way, the project could function as a cross-regional initiative with a local locus.

The project increased the capacity of a large number of practitioners. It is expected that a great part of these beneficiaries will continue using their newly acquired knowledge. The field research demonstrated that some countries are already using it. The knowledge-sharing database was created at the UNODC Track Portal. The choice of the UNODC website for placing these resources was the right tactic, as the stand-alone websites normally discontinue functioning after the end of a project. This database, along with the knowledge products, represents the most sustainable part of the project. These benefits will continue after the project ends.

HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND

EVALUATION QUESTION:

To what extent has the project design and implementation fully considered human rights (HR), gender equality (GE) as well as marginalized groups, including LGBTQI+ and people with disabilities?

Finding 12: Since the project was designed for public officers, it did not directly target marginalised populations. However, the primary objective of the project was to promote sustainable development, which is essentially
linked to human rights. Thus, the project indirectly promoted human rights. Women were encouraged to participate in project activities despite the absence of a gender-specific focus in its design.

The project’s target group was anti-corruption officers, law enforcement personnel, and private sector managers. Although the project did not directly work with vulnerable and marginalized groups, including LGBTQI+ and people with disabilities, the project’s overall aim was to foster sustainable development, which is essentially linked to human rights. In particular, the project intended to maximize the positive outcome of international investment projects by ensuring their integrity. This would contribute to the increased investments in health, education, and social welfare due to the reduced corruption flow, and respectfully, enhance the rights of citizens to health care, education, and an adequate standard of living, among others.

The project did not have a specific gender focus, but women were encouraged to take part in project events. For example, all beneficiary countries were requested to nominate their experts to participate in the workshops, taking into account the gender balance. As a result, nearly half of the workshop attendees in Belgrade were women (47.72%). In Samarkand, 21.81% of participants were female, which is representative of the male-dominated characteristic of the security sector in Central Asian and South Caucasian countries. Nearly 40% of participants of the first webinar were women. In addition, all Anti-Corruption Network focal points from the Balkan countries (Albania, Bosnia and Herzegovina, Montenegro, and Serbia) were women.

Moreover, all project events were accessible to everyone, including people with disabilities. For instance, all three offline events were also available online.
This project was of pioneering nature and regarded as the first intervention undertaken by an international organization to address corruption challenges in the BRI’s infrastructure projects, and specifically, in its Belt component. The project design was based on the evidence and reflected the priorities of national anti-corruption agencies in target countries as well as the cooperating agency – the Government of China. Project key stakeholders were consulted in the course of the project design and implementation to better address their anti-corruption priorities. Therefore, the project was responsive to the needs of beneficiary countries in terms of more effective implementation of the UNCAC, improving their national anti-corruption practices, strengthening their capacity, and enhancing international cooperation with their peers from countries across the Belt. The project was also aligned with the SDG 16.

The planned activities were interconnected with the project targets and indicators (outputs, outcomes, and expected accomplishments). The project was a part of the UNODC’s Global Anti-Corruption Program (GLOZ99). In this regard, the project objective was consistent with the GLOZ99’s goals. Overall, the project benefitted from effective partnerships. Close synergies were forged with the UNODC’s GLOBE Network. The project strengthened its existing partnership with the UNODC’s two regional offices in Tashkent and Belgrade. They contributing to the project’s overall efficiency and effectiveness. Since it was the first intervention, the project did not undermine the initiatives of other donors and governments in preventing and combatting corruption in large infrastructure projects in Belt-based countries.

The project was successful in using cost-effective strategies, resulting in a cost reduction. Resources were also efficiently reallocated between the project components. The project was also able to adjust its interventions to respond to COVID-19 pandemic. All planned activities were implemented that contributed to achieving the expected accomplishments and the overall objective.

The project’s major effect was that the awareness of anti-corruption practitioners in the area of addressing corruption in infrastructure projects was increased. This domain was new for many target countries while others shifted their focus to this sector as a result of the project interventions. Beneficiaries expanded their knowledge about corruptive loopholes in investment projects and new strategies to tackle them.

The project’s sustainability elements include the acquired skills and capacity, knowledge products, and a knowledge-sharing database. The sustainability of the Network is an issue. It needs further support to be fully functional. If supported, it can be expanded both thematically and by attracting new BRI-based countries.
IV. RECOMMENDATIONS

On the basis of the findings and conclusions of this report, the following recommendations are made, which are presented in order of importance:

RECOMMENDATION 1 – NETWORK SUSTAINABILITY AND EXPANSION

(Directed to the Convention Support Section (CSS), Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC. Timeframe: by June 2023). Based on finding 11 (Sustainability):

It is recommended that the CSS continues its support to the Anti-Corruption Network of Practitioners to assist it to be functional. Without further assistance, the network will not sustain. For this purpose, UNODC needs to facilitate communication between the network members in the short run by, among other things, sending the finalized project publications, inviting them to the online events of other UNODC projects (such as Globe Network), and/or initiating online discussions. Facilitation is an important element to keep members attached to the network. It should be of a regular manner.

As there is a high demand from the target countries in this network, in the long run, it is recommended that the project develops a strategy (by May 2023) to sustain the network. Mobilization of resources, including those from the Government of China, and/or financial development institutions such as ADB, AIIB, and WB, are advisable to be sought in order to strengthen the capacity of the current and new countries. There is a high potential to expand this network by adding new BRI countries. Moreover, the network could be expanded thematically to deal with other focus areas of UNCAC.

As a whole, the CSS can develop a long-term project and propose a variety of thematic workshops for the network members. Under the frame of the new project, annual meetings could be organized, which can be co-hosted together with target countries. Establishment of a Secretariat for the network is one of the potential exit strategies.

RECOMMENDATION 2 – DISSEMINATION AND PRESENTATION OF KNOWLEDGE PRODUCTS

(Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC. Timeframe: by April 2023). Based on finding 8 (Effectiveness):

It is recommended for the project staff develop a plan for the dissemination and presentation of knowledge products in order to increase readership. It is proposed to organize launch events and online presentations for target countries as well as other relevant groups. Moreover, as the guide designed for business companies, “Towards Building a Road of Integrity: Perspectives of Business Integrity and Compliance”, is too extensive in terms of pages, it is recommended to be accompanied by a brief summary. Alternatively, important data of this guide might be visualized to make them more appealing to the business sector.

RECOMMENDATION 3 – DIRECTORY AND COMMUNICATION PORTAL

(Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC. Timeframe: by the end of 2023). Based on finding 8 (Effectiveness):

It is recommended that the project staff updates the directory of designated focal points of the Anti-Corruption Network and sends it out to all target countries before the project is over. In the future, the update of the directory should be made at least once a year and be circulated among the network members.

Consider developing a functional and user-friendly communication platform in the future for effective interaction among the network members, subject to the availability of funds and the network expansion.
RECOMMENDATION 4 – EXIT STRATEGY

(Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC. Timeframe: by the end of 2023). Based on finding 10 (Sustainability):

It is recommended that the CSS envisages an exit strategy for each of its future projects at their onset to maximize sustainability. UNODC should engage all key project stakeholders in the exit strategy development (national governments and others). If national partners are involved in the creation of an exit strategy, they will be better prepared to continue the project on their own after its ending. The exit strategy also assists in capacitating the responsible national government so that they independently carry out the next phase of a project. Review of the exit strategy is a vital part of the project implementation process, particularly when work plans are amended and new circumstances emerge.

RECOMMENDATION 5 – INTER-REGIONAL PROJECT WITH NATIONAL FOCUS

(Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC. Timeframe: by the end of 2023). Based on findings 4 (Coherence) and 10 (Sustainability):

If the project is prolonged and financial resources are mobilized, it is recommended for the CSS to keep an inter-regional approach of this project, but activities focusing on national needs can be added. In other words, nationally tailored interventions could be undertaken under the umbrella of an inter-regional project. On one hand, it will promote international cooperation and exchange of cross-regional practices, while also addressing the national needs. In this line, proactive countries that are willing to reform their regulatory and institutional systems for administration of international infrastructure projects can be given the priority support. Such a model will also contribute to the development of local ownership by responsible national government stakeholders.

RECOMMENDATION 6 – FORMULATION OF POLICY OUTCOMES

(Directed to the Convention Support Section, Corruption and Economic Crime Branch, Division for Treaty Affairs, UNODC. Timeframe: by the end of 2023). Based on finding 5 (Coherence):

It is recommended for the CSS to carefully formulate the policy outcomes as the policy adoption is the function of governments, not projects or donors. Projects can only assist in drafting laws, policy recommendations, strategies or action plans and in monitoring their implementation. Hence, it would be more appropriate to formulate the policy outcome as ‘assisting’ or ‘contributing’ to the formulation or adoption of policies. Moreover, policy changes entail a longer period of time, which typically exceeds 12 months. Thus, the time horizon for projects having a policy outcome should exceed one year. To develop policies, projects also need to equip national stakeholders with sufficient capacity and resources. Moreover, the project’s expectations for target countries on policy outcomes should be communicated to them more clearly. In other words, beneficiaries should know what the project expects of them in terms of policy change.
LESSONS LEARNED

Networking: When the number of in-person events is limited, it is crucial that the same participants from target countries attend to foster a solid network between them. A newly established network also requires continuing facilitation, when communication among its members is encouraged. This will ensure members’ engagement and attachment to the network.

Project timeframe: The original 12-month project duration would be insufficient to ensure the adoption of policy guidance. Policymaking entails longer periods that go beyond 12 months, a timeframe initially planned for this project. Besides, 12 months would be tight to develop in-depth, peer-reviewed publications. More time horizons should be planned for such components.

Policy outcome: To assist the target countries in adopting policy changes, the project needs to offer them more well-tailored training sessions and support. These seminars/webinars also need to introduce beneficiaries to international norms and standards to be incorporated into national legislation. Beneficiaries also need to be equipped with more information, capacity and resources.

Early planning and discussions with national governments: Due to the need for coordination between different government agencies, the approval process (e.g., nomination of focal points, approval of the publication outline, etc.) in some countries is lengthy, making early planning and discussions crucial. This will prevent delays in the project implementation.

GOOD PRACTICES

Multi-stakeholder approach: As the anti-corruption efforts encompass a variety of government parties, the project used a multi-stakeholder approach in targeting its audience. The project involved a wide range of government agencies, including the prosecution, police, justice, anti-corruption, and procurement offices as well as the business community. Such a multi-sectoral approach enabled beneficiaries to analyse the anti-corruption challenges from various lenses. Moreover, this strategy contributed to creating inter-linkages between national government agencies inside a country, when they developed stronger connections with one another.

Inter-regional approach: Connecting countries from various regions with different levels of legal and institutional development added value for beneficiary countries. It stimulated learning of diverse practices. It also helped to better understand corruption challenges in various contexts.

Cooperation channels within UNODC: As the funding scale of this project was relatively small, the project team established close synergies with other UNODC initiatives to co-fund project activities. This helped to save the costs. In addition, there was a close collaboration between the project and the UNODC field Offices. These offices contributed to the project’s effectiveness and efficiency.

Co-hosting events with national governments: All project events were organized in partnership with the hosting governments. This resulted in not just smooth logistical arrangements, but in a reduction in costs. Such an arrangement also prompted other participating countries to propose co-organizing any potential future event. This would also enable future projects to save money.
Proactive and inclusive approach by the project team: Thanks to the proactive strategy, the project staff was able to develop additional outputs (products) with limited financial resources, which were not initially anticipated by the project. These included three additional webinars and three knowledge products. In addition, utilising existing resources, the project team made all project as well as event-related documents and knowledge products available in all three working languages (English, Russian, Chinese) and provided interpretation for all events in these languages. Moreover, cost-effective tools were also possible thanks to the proactive approach of the project staff.
## I. Background and Context

| **Project duration (dd/mm/yyyy-dd/mm/yyyy):** | 01/01/2020-30/09/2022 |
| **Location (Country/ies and sub-national focus areas, if relevant):** | Global programme with a focus on Central Asian and Eastern European countries |
| **Linkages to Country, Regional and Thematic Programmes & UNODC Strategy 2021-2025:** | This project is a sub-project under GLOZ99 which links to UNODC Subprogramme 3 on Countering Corruption and the UNODC Strategy 2021-2025 |
| **Linkages to the SDG targets to which the project contributes:** | SDG 16.5 |
| **Executing Agency (UNODC office/section/unit):** | UNODC/DTA/CEB/CSS |
| **Partner Organizations:** | N/A |
| **Donor(s):** | UN Peace and Development Trust Fund |
| **End Beneficiaries/Recipients:** | 16 countries along the Silk Road Economic Belt, including Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, China, Georgia, Greece, Iran (Islamic Republic of), Kazakhstan, Kyrgyzstan, Mongolia, Montenegro, Serbia, Tajikistan, Türkiye and Uzbekistan |
| **Total Approved Budget (USD):** | $500,528.18 inclusive of the 4% PSC |
| **Total Overall Budget (USD):** | $500,528.18 inclusive of the 4% PSC |
| **Total Expenditure by date of initiation of evaluation (USD):** | $488,845.18 USD |
| **Name and title of Project/Programme Manager(s) and implementing UNODC office(s)/section(s)/unit(s):** | - Project Officer: Yao Deng, Crime Prevention and Criminal Justice Officer, Corruption and Economic Crime Branch  
| **Time frame of evaluation: (planned start and end date of the evaluation process):** | 1 September 2022- 31 December 2022 |
| **Budget for this evaluation in USD**: | 20,000 USD |
| **Number of independent evaluators planned for this evaluation**: | 1 consultant |
| **Type and year of past evaluations (if any):** | GLOZ99 in 2021 |

17 Including fees for evaluation team, travel, printing, editing, translation, interpretation, etc.  
18 Please note that the recommendation for any UNODC evaluation is at least two independent evaluators, i.e. one Evaluation Expert and one Substantive Expert in the subject area of the project to be evaluated.


Project overview

The “Global Programme to prevent and combat corruption through effective implementation of the United Nations Convention against Corruption in support of Sustainable Development Goal 16” (GLOZ99) is a technical assistance programme implemented by UNODC to build the capacity of Member States in order to effectively implement the United Nations Convention against Corruption (UNCAC). Within the framework of the Global Programme, UNODC launched a project entitled “Fostering sustainable development by supporting the implementation of the United Nations Convention against Corruption in countries along the Silk Road Economic Belt” (Ref. #: PDF-SDG-2019-02.2-2), which is an interregional project aiming to establish an anti-corruption network for practitioners from countries along the Silk Road Economic Belt (Belt) under the Belt and Road Initiative (BRI) proposed by China, with a view to enhancing the prevention and combating of corruption in international investment projects through sharing information, experiences and good practices and enhancing international cooperation and peer-learning.

The anti-corruption network, officially launched in December 2021 in Sharm El-Sheikh, will benefit 16 countries along the Belt participating in this project, including, inter alia, Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, China, Georgia, Greece, Iran (Islamic Republic of), Kazakhstan, Kyrgyzstan, Mongolia, Montenegro, Serbia, Tajikistan, Türkiye, and Uzbekistan. Key activities of this project include the organization of a plenary meeting and two regional workshops as well as the development of two knowledge studies, one knowledge database, one directory of focal points and a technical document on the proposed online practitioners’ forum. Gender parity was paid attention to under the different events of this project.

Participating countries welcomed the initiative of establishing the Anti-Corruption Practitioners’ Network along the Silk Road Economic Belt and showed a strong commitment to supporting UNODC’s work beyond the project cycle for this network. The participants gave high ratings to the two regional workshops. Several countries, such as Türkiye and Azerbaijan, expressed interest to host future events under this network.

The Project’s Objective:

To build and maintain a network for selected developing countries along the Silk Road Economic Belt to prevent and combat corruption and enhance international cooperation and asset recovery in line with the SDGs, the United Nations Convention against Corruption, and the concrete needs of the focus countries, with a view to creating a sound economic and social environment in promoting and safeguarding the BRI infrastructure investments and successfully achieving the SDGs.

The Project’s Outcomes:

1. Establishment of a fully functional network for the focus countries to promote coordination, peer-learning, and sharing of good practices relevant to the fight against corruption pertaining to international investment projects, including under the BRI context;
2. Development of two comprehensive studies/handbooks on ensuring integrity in international investment projects and strengthening business integrity and compliance;
3. Establishment of a knowledge-sharing database in the framework of the network;
4. Organization of two regional workshops regarding the prevention and combating of corruption in international investment projects;
5. Establishment of a directory of focal points designated by the participating countries for this network;
6. Development of a technical document on the customer requirements of an IT tool – online practitioners’ forum to facilitate communication among practitioners under this network.
II. Purpose and Scope of the Evaluation

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<tr>
<th>Planned utilisation of the evaluation results(^{19}):</th>
<th>The evaluation results will be submitted to the Project Management Unit of the UN Peace and Development Trust Fund and further to the donor-Government of China.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main users of the evaluation results(^{20}):</td>
<td>UNDESA, UNODC, and the Government of P. R. China</td>
</tr>
<tr>
<td>Unit of analysis (full projects/segment/etc.)</td>
<td>Full project</td>
</tr>
<tr>
<td>Time period covered by the evaluation:</td>
<td>1 January 2020- 30 September 2022</td>
</tr>
<tr>
<td>Geographical coverage of the evaluation:</td>
<td>Central Asia, Eastern Europe (particularly the Balkan region)</td>
</tr>
</tbody>
</table>

III. Evaluation criteria

The evaluation will be conducted based on the below selected relevant DAC criteria\(^{21}\). All evaluations must include gender, human rights, disability inclusion and no one left behind. Ideally these are mainstreamed within the evaluation questions. Moreover, the evaluation needs to identify lessons learned\(^{22}\) and good practices. The evaluation questions will be further refined by the Evaluation Team in the drafting of the Inception Report.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Evaluation question</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relevance(^{23}): Is the intervention doing the right thing?</td>
<td>To what extent has the project been relevant to stakeholder’s (e.g. governments, Member States, etc.) needs and priorities?</td>
</tr>
<tr>
<td>Coherence(^{24}): How well does the intervention fit?</td>
<td>To what extent the planned activities were in line with the logical framework, coherent and realistic?</td>
</tr>
<tr>
<td>Efficiency(^{25}): How well are resources being used?</td>
<td>To what extent has the project delivered outputs in a timely and efficient manner?</td>
</tr>
<tr>
<td>Effectiveness: Is the intervention achieving its objectives?(^{26})</td>
<td>To what extent did the project achieve its intended outcomes and objective?</td>
</tr>
</tbody>
</table>

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\(^{19}\) e.g. inform the future development of the project or similar projects, for organizational learning, assess the success and areas of improvement of the project etc.

\(^{20}\) e.g. senior management, programme management, stakeholders, beneficiaries, donors etc.

\(^{21}\) [https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm](https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm)

\(^{22}\) Lessons learned concern the learning experiences and insights that were gained throughout the project/programme.

\(^{23}\) Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient and donor.

\(^{24}\) The compatibility of the intervention with other interventions in the country, sector or institution.

\(^{25}\) The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way.

\(^{26}\) The extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.
### IV. Evaluation Methodology

All evaluations of the United Nations system are guided by the principles of human rights, gender equality, disability inclusion and leaving no one behind. Gender-sensitive and disability inclusive evaluation methods and gender-sensitive and disability inclusive data collection techniques are therefore essential to identify key gender issues, address marginalized, disabled, hard-to-reach and vulnerable population.

The methods used to collect and analyse data

While the evaluation team shall fine-tune the methodology for the evaluation in an Inception Report, a **mixed-methods approach of qualitative and quantitative methods** is mandatory due to its appropriateness to ensure that evaluation conclusions, findings, recommendations, and lessons learned are substantiated by evidence and based on sound data analysis and triangulation; as well as a gender-sensitive, inclusive, respectful and participatory approach and methodology to capture disability and gender equality issues. Special attention will be paid to: (i) ensuring that voices and opinions of both men, women and other marginalised groups, such as people with disabilities are heard (including gender related and disaggregated data, e.g. by age, sex, countries etc.); (ii) ensuring an unbiased and objective approach and the triangulation of sources, methods, data, and theories. The limitations to the evaluation need to be identified and discussed by the evaluation team in the Inception Report, e.g. data constraints (such as missing baseline and monitoring data). Potential limitations as well as the chosen mitigating measures should be included. The evaluation team will be asked to present a dedicated methodology in the Inception Report outlining the evaluation criteria, indicators, sources of information and methods of data collection. The evaluation methodology must conform to the United Nations Evaluation Group (UNEG) Norms and Standards as well as the UNODC Evaluation Policy, guidance, tools and templates. The evaluation team is also expected to use interviews, surveys and/or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation. While maintaining independence, the evaluation will be carried out based on a participatory approach, which seeks the views and assessments of all parties identified as the stakeholders of the project/programme.

The final evaluation report will be externally independently assessed (facilitated by IES) and the final rating will be included in the report. Based on this assessment, the report may not be published if it does not meet minimum quality standards.

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27 The extent to which the intervention has generated or is expected to generate significant positive or negative, intended or unintended, higher-level effects.

28 The extent to which the net benefits of the intervention continue or are likely to continue.

29 The extent to which the project/programme has mainstreamed human rights, gender equality, and the dignity of individuals, i.e. vulnerable groups, including those with disabilities.
All tools, norms and templates to be mandatorily used in the evaluation process can be found on the IES website: https://www.unodc.org/unodc/en/evaluation/guidelines-and-templates.html

V. Timeframe and Deliverables

<table>
<thead>
<tr>
<th>Evaluation stage</th>
<th>Start date (dd/mm/yy)</th>
<th>End date (dd/mm/yy)</th>
<th>Subsumed tasks, roles</th>
<th>Guidance / Process description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finalisation ToR (2-4 weeks)</td>
<td>23/08/22</td>
<td>06/09/22</td>
<td>Initiate the evaluation in Unite Evaluation and upload ToRs; finalise draft ToR based on IES feedback; IES shares final draft with CLPs; PM to finalise ToR based on CLPs feedback.</td>
<td>Includes 1 week review by IES and 1 week review by CLPs; multiple revisions by PM based on IES and CLPs feedback; final clearance by IES; in parallel, outreach by PM to qualified evaluators (consultation with IES on potential candidates)</td>
</tr>
<tr>
<td>Recruitment (3-4 weeks)</td>
<td>06/09/22</td>
<td>27/09/22</td>
<td>Consult with IES on potential evaluators; PM manages full recruitment process(^{30})</td>
<td>Review and clearance of evaluators by IES before recruitment can be initiated by PM.</td>
</tr>
<tr>
<td>Inception Report, incl. desk review (2 weeks)</td>
<td>27/09/22</td>
<td>11/10/22</td>
<td>Kick-off meeting with PM and evaluators; desk review by evaluators, followed by draft Inception Report; Review by IES; clearance of revised Final Inception Report by IES</td>
<td>Includes 1 week review and clearance by IES; IES may participate in the kick-off meeting</td>
</tr>
<tr>
<td>Data collection (incl. field missions)</td>
<td>11/10/22</td>
<td>25/10/22</td>
<td>Data collection; observation; interviews; etc. by evaluators</td>
<td>Coordination of data collection dates and logistics by PM.</td>
</tr>
<tr>
<td>(3-4 weeks)(^{31})</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Analysis and draft report (3-4 weeks)</td>
<td>25/10/22</td>
<td>08/11/22</td>
<td>Data analysis and drafting of report by evaluators</td>
<td>Includes 1 week review by IES, followed by 1 week review by PM</td>
</tr>
<tr>
<td></td>
<td>08/11/22</td>
<td>22/11/22</td>
<td>Review by IES; review by PM; revision of draft report by evaluators</td>
<td></td>
</tr>
<tr>
<td>Draft report for CLP comments (1 week)</td>
<td>22/11/22</td>
<td>29/11/22</td>
<td>CLPs review and provide comments to IES</td>
<td>CLP comments are compiled and shared by IES with evaluators</td>
</tr>
<tr>
<td>Final report, evaluation brief, PowerPoint slides, and</td>
<td>29/11/22</td>
<td>06/12/22</td>
<td>Revision by evaluators; Evaluation report, 2-page Evaluation Brief and PowerPoint slides are finalised by evaluators based upon</td>
<td>Includes 1 week review and clearance by IES of Final Report and Brief and 1 week review by PM of Brief and PowerPoint slides; 1 week review by PM</td>
</tr>
</tbody>
</table>

\(^{30}\) Please follow the official recruitment process for international, regional or national consultants at UNODC.

\(^{31}\) Data collection is currently likely to take longer than usual due to competing priorities of stakeholders and beneficiaries due to COVID-19. Data collection phase may imply on-line interviews, surveys etc instead of travel/face-to-face interviews.
The UNODC Independent Evaluation Section may change the evaluation process, timeline, approach, etc. as necessary at any point throughout the evaluation process.

### VI. Evaluation Team Composition

<table>
<thead>
<tr>
<th>Role</th>
<th>Number of consultants(^{32}) (national/international)</th>
<th>Specific expertise required(^{33})</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluation Expert</td>
<td>1 international consultant</td>
<td>Evaluation methodology</td>
</tr>
</tbody>
</table>

The evaluation team will not act as representatives of any party and must remain independent and impartial and 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 evaluation team shall respect and follow the UNEG Ethical Guidelines for conducting evaluations in a sensitive and ethical manner. The qualifications and responsibilities for each evaluation team member are specified in the respective job descriptions attached to these Terms of Reference (Annex 1). The evaluation team will report exclusively to the Chief or Deputy Chief of the UNODC Independent Evaluation Section, who are the exclusive clearing entity for all evaluation deliverables and products.

The evaluation team will be issued consultancy contracts and paid in accordance with UNODC rules and regulations.

The payment will be made by deliverable and only once cleared by IES. Deliverables which do not meet UNODC and UNEG evaluation norms and standards will not be cleared by IES. IES is the sole entity to request payments to be released in relation to evaluation. Project/Programme Management must fulfill any such request within 5 working days to ensure the independence of this evaluation process. Non-compliance by Project/Programme Management may result in the decision to discontinue the evaluation by IES.

\(^{32}\) Please note that an evaluation team needs to consist of at least 1 independent evaluator – the Evaluation Expert – and ideally one Substantive Expert.

\(^{33}\) Please add the specific technical expertise needed (e.g. expertise in anti-corruption; counter terrorism; etc.) – please note that at least one evaluation team member needs to have expertise in human rights and gender equality.
VII. Roles and Responsibilities in the Evaluation Process

Please ensure that the full evaluation process is managed through Unite Evaluations (evaluations.unodc.org)\textsuperscript{34}. All communication of preliminary, draft or final evaluation results needs to be reviewed and cleared by IES before dissemination.

<table>
<thead>
<tr>
<th>Evaluation stage</th>
<th>Project Manager</th>
<th>IES</th>
<th>Evaluation team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall</td>
<td>Provide management, administrative and logistical support to the evaluation process, as per IES’s tools, guidance and templates, in line with UNODC Evaluation Policy, UNEG Norms and Standards, and DMSPC Guidelines for evaluation.</td>
<td>Ensure the independence, participation, and quality of the evaluation process, as per UNODC Evaluation Policy, UNEG Norms and Standards, and DMSPC Guidelines for evaluation –including the review and approval of all evaluation deliverables.</td>
<td>Submit deliverables on time and meeting quality standards, as per IES’s tools, guidance and templates, in line with UNODC Evaluation Policy, UNEG Norms and Standards, and DMSPC Guidelines for evaluation.</td>
</tr>
<tr>
<td>ToR</td>
<td>Draft, uploading to Unite evaluations and finalizing</td>
<td>1 round of comments</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Identify stakeholders and CLPs</td>
<td>Share ToR with CLPs for comments (1 week)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Compile the desk review material</td>
<td>Support the Project Manager in the identification of suitable evaluation team, when possible</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Identify potential substantive evaluators and experts</td>
<td>licht</td>
<td></td>
</tr>
<tr>
<td>Recruitment</td>
<td>Propose evaluators and experts after consultation with IES</td>
<td>Review &amp; clear proposed evaluation team before recruitment process starts</td>
<td>Submit all required documentation for the selection and recruitment process</td>
</tr>
<tr>
<td></td>
<td>Administrative process and recruitment (in line with organisational rules and regulations for consultants)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Finalise the compilation of the desk review material</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inception Report</td>
<td>Engage with the evaluation team and provide all required information, documents, stakeholder lists, schedule kick-off meeting etc.</td>
<td>Attend kick-off meeting as necessary, and provide relevant templates and guidance, review draft Inception Report in line with UNODC and UNEG norms and standards</td>
<td>Participate in kick-off meeting \textsuperscript{35} Draft Inception Report in line with UNODC templates and guidelines</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Release payment once requested by IES</td>
<td>Clear Final Inception Report before any data collection can start</td>
<td></td>
</tr>
<tr>
<td></td>
<td>All logistical arrangements for the evaluators (including travel)</td>
<td>Provide guidance on the evaluation process to the</td>
<td>Conduct an independent,</td>
</tr>
</tbody>
</table>

\textsuperscript{34} The Unite Evaluations user manual for Project Managers is available here.\textsuperscript{35} https://www.unodc.org/unodc/en/evaluation/normative-tools.html
<table>
<thead>
<tr>
<th>Evaluation stage</th>
<th>Project Manager</th>
<th>IES</th>
<th>Evaluation team</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Data collection and analysis</strong></td>
<td>arrangements, set-up of interviews as requested, note verbales, etc.).</td>
<td>evaluation team and/or the project team, as needed.</td>
<td>participatory and high-quality data collection.</td>
</tr>
<tr>
<td></td>
<td>Timely travel arrangements, payments of DSAs, etc.</td>
<td></td>
<td>Implement the methods and tools developed in the Inception Report.</td>
</tr>
<tr>
<td></td>
<td>Participate in de-briefings, as necessary</td>
<td></td>
<td>Engage with Project Management to request further information and assistance as required. Conduct de-briefings to PM, as necessary</td>
</tr>
<tr>
<td></td>
<td>Provide further data, documents, stakeholders, etc. as requested by the evaluation team.</td>
<td></td>
<td>Conduct a thorough analysis to ensure triangulation of evidence.</td>
</tr>
<tr>
<td></td>
<td>Provide further information to evaluators as requested</td>
<td></td>
<td>Provide a high-quality draft report, in line with UNODC and UNEG N&amp;S</td>
</tr>
<tr>
<td><strong>Draft report</strong></td>
<td>1 review of the draft report for factual errors, once cleared by IES</td>
<td>Review of the draft report</td>
<td>Incorporate comments of IES and consider those of PM</td>
</tr>
<tr>
<td></td>
<td>Release payment, once cleared by IES</td>
<td>Initial clearance or rejection of draft report</td>
<td>Share draft report with CLPs (1 week) Incorporate comments of CLPs.</td>
</tr>
<tr>
<td><strong>Final report, Brief and Presentation</strong></td>
<td>Complete Management Response and Evaluation Follow-up Plan</td>
<td>Facilitation of external quality assessment of the report.</td>
<td>Based on the external assessment, finalise the report, 2-page Evaluation Brief and PowerPoint slides.</td>
</tr>
<tr>
<td></td>
<td>Review the 2-page Evaluation Brief and PowerPoint slides and organize an MS Teams presentation of the results to internal and external stakeholders</td>
<td>Final review by IES and either 1) clearance for publication or 2) non-clearance for publication if it does not meet UNODC &amp; UNEG norms and standards IES to attend final presentation as necessary</td>
<td>Present the results as agreed with Project Management and as cleared by IES within 4 weeks of approval of the final evaluation report.</td>
</tr>
<tr>
<td></td>
<td>Release all outstanding payments, as requested by IES</td>
<td>Clear all deliverables for payment, once they meet UNEG Norms and Standards and UNODC evaluation policy, templates and guidelines.</td>
<td></td>
</tr>
<tr>
<td><strong>Follow-up</strong></td>
<td>In case the report is not cleared by IES, use it exclusively for internal reporting (NOT for dissemination)</td>
<td>Yearly update on the implementation of recommendations.</td>
<td>Report on the implementation of recommendations to</td>
</tr>
</tbody>
</table>

**ANNEX II : EVALUATION TOOLS : QUESTIONNAIRES AND INTERVIEW GUIDES**
<table>
<thead>
<tr>
<th>Evaluation stage</th>
<th>Project Manager</th>
<th>IES</th>
<th>Evaluation team</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Member States and the Executive Director on an annual basis.</td>
</tr>
</tbody>
</table>
ANNEX II: EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES

SEMI-STRUCTURED INTERVIEW GUIDES BY STAKEHOLDER GROUP

The Independent Evaluation Section of UNODC is in the process of conducting a Final Independent Project Evaluation of UNODC’s “Fostering Sustainable Development by Supporting the Implementation of the UNCAC Against Corruption in Countries Along the Silk Road Economic Belt” Project. The evaluation is undertaken in line with UNODC and UNEG norms and standards for evaluation.

The purpose of the evaluation is to assess the level of project achievements and identify the gaps in its implementation. The evaluation also seeks to identify lessons learned, good practices, and areas for improvement that could inform the design and management of similar projects in the future.

The evaluation is carried out by an independent evaluator, Ms. Aida Alymbaeva.

Confidentiality and informed consent: This interview is confidential, with all information received being aggregated and anonymised. No individual will be quoted nor will the organization they represent be identified. The data collected will only be used for evaluation purposes. Your participation in the interview is voluntary and you may withdraw from it at any moment.

INTERVIEW QUESTIONS FOR PROJECT STAFF

Relevance:

- Can you brief about the project background? Why did the topic of the anti-corruption along the Silk Road Economic Belt become important for UNODC?
- Was the project designed based on evidence (research, lessons learned and evaluations from past programming)?
- Were the project stakeholders and beneficiaries, including the Chinese government and other national governments, involved in the project formulation?
- How did the project respond to the real needs and priorities of target countries?
- Did the project adequately take into account national realities, including the strengths and weaknesses of the national governments, and their needs in terms of capacity building, policy-making, and institutional development?
- How did the project support the target countries in achieving the SDGs?

Coherence:

- Was the project design appropriate to meet the envisaged objectives? What were the drawbacks and advantages of the project design?
- Did the project have any linkages with the UNODC’s Global Anti-Corruption Program, UNODC Subprogram 3 on Countering Corruption, or other UNODC international or regional initiatives?
- Is there any evidence of the built synergies between the project and other UNODC programs? (e.g. development of joint training manuals, organization of workshops, etc.)
- What partner organizations did the project cooperate with to achieve the project results? (e.g. UN agencies, CSOs, private sector, academia, etc.)? What were the results of this partnership?
- Did the project complement activities of the “Beijing Initiative for the Clean Silk Road”? In what way?
• Did the project support or undermine initiatives of other donors and governments in the field of preventing and combatting corruption?

Efficiency:
• Did the project spend its budget? What was the utilization/implementation rate?
• Were there any delays in project implementation? What were the reasons for delays and how were they addressed?
• Did the project try and exploit tools and systems that encourage cost-effective use of resources? Were there decreases in costs as a result of these systems and processes?
• What modalities of training delivery were used – did they focus on the use of national trainers and provide specific examples of a focus on cost-effectiveness?
• Was the number of target countries optimal for achieving the project results?
• Did the complex clearance process that participating countries had to go through cause the delay in project implementation? If so, how was this challenge addressed by the project?
• Was the length of the project conducive to achieving project results?

Effectiveness:
• Did the project establish a fully functional network to promote coordination, peer learning, and sharing of good practices to prevent and fight corruption, including, in the BRI infrastructure projects?
• Did the project develop two manuals on prevention, countering corruption, international cooperation, and asset recovery in the BRI context?
• Did the project create a knowledge-sharing database on prevention, countering corruption, international cooperation, and asset recovery in the BRI context? Is it accessible to policymakers and practitioners?
• How many countries have adopted or are in the process of adopting policy guidance on addressing corruption risks and promoting international cooperation in the BRI context?
• Did the project develop a directory for designated focal points and an online communication system for their interaction?
• Did the project enhance the engagement of target countries through the Anti-Corruption Network to identify common regulatory and institutional gaps?
• Did the project strengthen the capacity of policymakers, practitioners, and other stakeholders to develop policies, legislation, mechanisms, and institutional framework in mitigating corruption risks and enhancing international cooperation for safeguarding the BRI investments?
• Did the project help the participating countries implement the UNCAC? In what way?
• Which project results were not achieved? What were the reasons for non-achievement? What were the facilitating and hindering factors in achieving the project results? Responses from
• How did the adjustments made in response to the COVID-19 pandemic, if any, affect the achievement of the project’s expected results?

Impact:
• Did the project contribute to changes that the national governments and other stakeholders take to fight corruption, including in the large infrastructure projects along the Silk Road Economic Belt?
• Did the project raise the awareness of policymakers and practitioners of good practices in preventing and combatting corruption in international infrastructure projects?
• Is there any evidence that the beneficiary countries have used the new knowledge and/or good practices learned through the project’s capacity-building activities?
• Are there examples of the new anti-corruption policy changes adopted by the recipient countries?
Did the project enhance international cooperation and asset recovery in line with the UNCAC and the concrete needs of the focus countries?

Is there any evidence that the project helped the target countries in the achievement of SDGs?

What other tangible changes (positive or negative, intended or unintended) did the project make as the result of its activities?

**Sustainability:**

Was the attachment of the Anti-Corruption Network of Practitioners and communication platform to the Belt and Road Forum for International Cooperation a project exit strategy? Was it implemented?

Was there any other viable exit strategy?

Did the project purposefully engage key national stakeholders throughout the project design and implementation to ensure their ownership?

What factors hindered or facilitated the project’s ownership?

Did the project develop local capacities or structures to support sustainability?

Which elements of the project are more or less sustainable?

Is there any evidence that project products (Anti-Corruption Network, directory, and communication portal) will function beyond project support?

Were appropriate ‘champions’ identified and/or supported by the project?

**HR, GE, Disability Inclusion, and LNOB:**

How did the project mainstream human rights, gender equality, disability inclusion, and the LNOB into the project design and implementation?

What were the major achievements and major shortcomings in addressing HR, GE, and vulnerable group needs, including any facilitating or hindering factors?

How could the approach to HR, GE, vulnerable groups, and LNOB be improved?

Did the project implement concrete actions to ensure equal participation and representation of women and vulnerable groups?

Why were the gender-disaggregated indicators not incorporated into the project design?

**Lessons learned and good practices:**

Did the project bring out any new good practices that this project can boast of?

What are the good practices that can be replicated in future projects and programs?

What are the project’s main lessons that could inform UNODC’s future support to the Member States?

What should be adjusted, dropped off, or reinforced to deliver better results in the future?

**INTERVIEW QUESTIONS FOR GOVERNMENT REPRESENTATIVES (BENEFICIARIES):**

**Introduction:**

Could you please describe your role in the project or in which particular project activity(ies) you have participated?

**Relevance:**
• Was this project relevant to the needs and priorities of your country in preventing and combatting corruption, including in large infrastructure projects along the BRI?
• To what national policies and strategies did the project contribute to?
• Did the project adequately take into account the institutional development of your country, as well as its needs in terms of capacity building and policymaking?
• Do you think that the project provided an adequate response to meet your country’s needs and priorities in fighting corruption in the large infrastructure projects along the BRI?
• In your view, how did the project support your country in achieving the SDGs?
• Overall, how did you find the project design?

**Coherence:**

• Was the project consistent with the anti-corruption programs and initiatives of your country? Please list them.
• Did the project support or undermine initiatives of other donors in your country in the field of preventing and combatting corruption?
• Did the project assist your agency and/or country to develop new partnerships at the bilateral and multi-lateral levels? If so, please provide examples of the project contribution to strengthening cooperation, partnerships, or linkages at the national or international level.
• What weaknesses were there in partnership and cohesion? How can cooperation/ partnership be improved?

**Efficiency:**

• Was the number of target countries optimal for benefiting from the project activities?
• Did your country face the complex clearance process that could have caused the delay in project implementation? If so, how was this challenge addressed?
• In terms of efficiency (e.g., cost-efficiency), is there anything that could have been done in a better way?

**Effectiveness:**

• Did your agency and/or country benefit from the Anti-Corruption Network created by the project? In what way?
• How successfully did the project promote coordination, peer learning, and sharing of good practices on prevention and combating corruption, including, in the BRI projects, among the target countries?
• Did you use manuals and guides developed by the project on prevention, countering corruption, international cooperation, and asset recovery? How useful are they for you, your agency and/or your country?
• Did you use resources from the knowledge-sharing database created at the UNODC micro-website?
• Following your country’s participation in this project, has it adopted or is in the process of adopting policy guidance on addressing corruption risks and promoting international cooperation in the BRI context?
• Did the project strengthen your capacity as well as capacity of policymakers, practitioners or other stakeholder(s) from your country in developing policies, legislation, mechanisms, and institutional framework in mitigating corruption risks?
• Did the project enhance the engagement of target countries through the Anti-Corruption Network?
• Did the project help your country implement the UNCAC? In what way?
• What aspects and/or activities of the project would you change if it were to start now?

**Impact:**

ANNEX II : EVALUATION TOOLS : QUESTIONNARES AND INTERVIEW GUIDES
• What do you think will be the main, concrete, and enduring impacts that the project has made for your agency, country and/or the region?
• What is your opinion about the project’s impact on promoting integrity in large infrastructure projects along the BRI?
• Did the project contribute to changes that your government takes to fight corruption, including in the large infrastructure projects along the Silk Road Economic Belt?
• Did the project raise your awareness of good practices in preventing and combatting corruption in international infrastructure projects?
• Is there any evidence that you used the new knowledge and/or good practices acquired through the project’s capacity-building activities?
• Are there any examples of new anti-corruption policies or regulatory changes adopted by your country as a result of participation in this project?
• Did the project enhance international cooperation and asset recovery between the focus countries?
• What other tangible changes (positive or negative, intended or unintended) did the project make as the result of its activities?

Sustainability:
• Will your country continue participating in the Anti-Corruption Network and using the communication portal?
• Which elements of the project are more or less sustainable?
• What, in your view, are the key things needed to ensure project sustainability over the longer term?

Lessons learned and good practices:
• What are the good practices that can be replicated in future projects and initiatives in your country?
• What are the project’s lessons that could inform UNODC’s future support to the Member States?
• What should be adjusted, dropped off, or reinforced to deliver better results in the future?

INTERVIEW QUESTIONS FOR PARTNER ORGANIZATIONS:

Introduction:
• Could you please describe your role in the project?

Relevance:
• Was your organization involved or consulted during the project formulation?
• In your view, how did the project respond to the real needs and priorities of target countries?
• Did the project adequately take into account national realities, including the strengths and weaknesses of the national governments, and their needs in terms of capacity building, policy-making, and institutional development?

Coherence:
• Was the project design appropriate to meet the envisaged objectives? What were the drawbacks and advantages of the project design?
• Did the project have any linkages with your organization’s initiatives and programs? What were the results of the partnership between this project and your organization?
• Did the project have any linkages with other international or regional initiatives and programs?
• Is there any evidence of the built synergies between the project and your organization’s programs? (e.g. development of joint training manuals, organization of workshops, etc.)
• Did the project support or undermine initiatives of other donors and governments in the field of preventing and combatting corruption?
• Did the project develop or strengthen other partnerships at the regional and international levels?

Efficiency:
• Were there any delays in the implementation of project activities with your organization? What were the reasons for these delays and how were they addressed?
• Are you aware of any tools and systems that the project used to encourage the cost-effective use of resources?
• Was the number of target countries optimal for achieving the project results?

Effectiveness:
• Did the project enhance the engagement of target countries through the Anti-Corruption Network?
• Did the project strengthen the capacity of policymakers, practitioners, and other stakeholders to develop policies, legislation, mechanisms, and institutional framework in mitigating corruption risks and enhancing international cooperation for safeguarding the BRI investments?
• Did the project help the participating countries implement the UNCAC? In what way?
• What were the facilitating and hindering factors in achieving the project results?

Impact:
• Did the project contribute to changes that the national governments and other stakeholders take to fight corruption, including in the large infrastructure projects along the Silk Road Economic Belt?
• Did the project raise the awareness of policymakers and practitioners of good practices in preventing and combatting corruption in international infrastructure projects?
• Are you aware of any example that the beneficiary countries used the new knowledge and/or good practices learned through the project’s capacity-building activities?
• Are you aware of any new anti-corruption policy and regulatory changes made by the recipient countries?
• Did the project enhance international cooperation and asset recovery in line with the UNCAC and the concrete needs of the focus countries?
• Is there any evidence that the project helped the target countries in the achievement of SDGs?
• What other tangible changes (positive or negative, intended or unintended) did the project make as the result of its activities?

Sustainability:
• What you think of the project sustainability?
• Is there any evidence that project products (Anti-Corruption Network, directory, and communication portal) will function beyond project support?

HR, GE, Disability Inclusion, and LNOB:
• How did the project mainstream human rights, gender equality, disability inclusion, and the LNOB into the project design and implementation?
• What were the major achievements and major shortcomings in addressing HR, GE, and vulnerable group needs, including any facilitating or hindering factors?
• How could the approach to HR, GE, vulnerable groups, and LNOB be improved?

**Lessons learned and good practices:**

• What are the project good practices that can be replicated in future projects and programs?
• What are the project’s main lessons learned that could inform future projects in this field?
• What should be adjusted, dropped off, or reinforced to deliver better results in the future?

**INTERVIEW QUESTIONS FOR CONSULTANTS:**

**Introduction:**

• Could you please describe your role in the project?

**Relevance:**

• Were you involved or consulted during the project formulation?
• In your view, how did the project respond to the real needs and priorities of target countries in preventing and combatting corruption in large infrastructure projects?

**Coherence:**

• Was the project design appropriate to meet the envisaged objectives? What were the drawbacks and advantages of the project design?
• Did the project have any linkages with other international or regional initiatives and programs?
• Is there any evidence of the built synergies between the project and other organizations? (e.g. development of joint training manuals, organization of workshops, etc.)
• Did the project support or undermine initiatives of other donors and governments in the field of preventing and combatting corruption?

**Efficiency:**

• Were there any delays in the implementation of project activities that you were involved in? What were the reasons for these delays and how were they addressed?
• Are you aware of any tools and systems that the project used to encourage the cost-effective use of resources?
• Was the number of target countries optimal for achieving the project results?

**Effectiveness:**

• In your opinion, did the project enhance the engagement of target countries through the Anti-Corruption Network?
• Did the project strengthen the capacity of policymakers, practitioners, and other stakeholders to develop policies, legislation, mechanisms, and institutional framework in mitigating corruption risks and enhancing international cooperation for safeguarding the BRI investments?
• Did the project help the participating countries implement the UNCAC? In what way?
• What were the facilitating and hindering factors in achieving the project results?
Impact:

- Did the project contribute to changes that the national governments and other stakeholders take to fight corruption, including in the large infrastructure projects along the Silk Road Economic Belt?
- Did the project raise the awareness of policymakers and practitioners of good practices in preventing and combatting corruption in international infrastructure projects?
- Is there any evidence that the beneficiary countries used the new knowledge and/or good practices learned through the project’s capacity-building activities?
- Are there examples of the new anti-corruption policy and regulatory changes made by the recipient countries?
- Did the project enhance international cooperation and asset recovery in line with the UNCAC and the concrete needs of the focus countries?
- Is there any evidence that the project helped the target countries in the achievement of SDGs?
- What other tangible changes (positive or negative, intended or unintended) did the project make as the result of its activities?

Sustainability:

- In your view, did the project develop local capacities or structures to support sustainability?
- Which elements of the project are more or less sustainable?
- Is there any evidence that project products (Anti-Corruption Network, directory, and communication portal) will function beyond project support?

HR, GE, Disability Inclusion, and LNOB:

- How did the project mainstream human rights, gender equality, disability inclusion, and the LNOB into the project design and implementation?
- How could the approach to HR, GE, vulnerable groups, and LNOB be improved?

Lessons learned and good practices:

- What are the good practices from the project implementation that can be replicated in future projects and programs?
- What are the project’s main lessons learned that could inform future projects in this field?
- What should be adjusted, dropped off, or reinforced to deliver better results in the future?
# UNODC DOCUMENTS

<table>
<thead>
<tr>
<th>Document – name</th>
<th>UNODC DOCUMENTS</th>
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<tbody>
<tr>
<td>Project Document for “Fostering sustainable development by supporting the implementation of the United Nations Convention against Corruption in countries along the Silk Road Economic Belt”</td>
<td>Project Progress Reports (quarterly, semi-annual), 2020-2022</td>
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<tr>
<td>Activity Report for the Plenary Meeting to Launch the Anti-Corruption Network</td>
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<td>Knowledge-Sharing Database IT Technical Specification Requirement Report</td>
</tr>
<tr>
<td>Activity Report for the 1st Regional Workshop in Samarkand, Uzbekistan</td>
<td>Addressing Corruption and Fraud in International Infrastructure Projects</td>
</tr>
<tr>
<td>Activity Report for the 1st Regional Workshop in Samarkand, Uzbekistan</td>
<td>UNODC Handbook on Business Integrity and Compliance for BRI “Towards Building a Road of Integrity: Perspectives of Business Integrity and Compliance”</td>
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<tr>
<td>Activity Report for the 2nd Regional Workshop in Belgrade, Serbia</td>
<td>Manual Integrity in International Investment Projects - Good Practices, New Perspectives</td>
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<td>Post-Training Assessment Surveys, 2nd Regional Workshop in Belgrade, Serbia</td>
<td>Training Guide - Corruption Risk Assessment in International Investment Sector</td>
</tr>
<tr>
<td>Activity Report for the 1st Webinar/Online Knowledge Session</td>
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<tr>
<td>&quot;Forensic audit techniques, strategies and forensic analytics in detecting corruption in international investment projects&quot;</td>
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<tr>
<td>Documents (description of the webinar, participation list, etc.) from the 1st Regional Workshop in Belgrade, Serbia</td>
<td>Activity Report/Evaluation for the 2nd Webinar/Online Knowledge Session</td>
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<tr>
<td>Activity Report for the 2nd Webinar/Online Knowledge Session</td>
<td>Key data and figures from Project’s microwebsite “Fostering sustainable development by supporting the implementation of uncac in countries along the silk road economic belt”</td>
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38 https://www.unodc.org/documents/SDGs/UNODC-SDG_brochure_LORES.pdf
41 http://www.unevaluation.org/document/detail/1914
## EXTERNAL DOCUMENTS

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<tr>
<td>Beijing Initiative for the Clean Silk Road, China Daily, 2019</td>
</tr>
<tr>
<td>China’s Belt and Road Initiative in the Global Trade, Investment and Finance Landscape, OECD, 2018</td>
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<tr>
<td>China’s Belt and Road Initiative in Central Asia: Ambitions, Risks and Realities, OECE Academy, 2020</td>
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<td>China’s ”Belt and Road” Initiative and the South Caucasus, ETH Zurich, 2019</td>
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<tr>
<td>Kyrgyzstan’s President’s Decree on Measures to Improve the Foreign Investments Governance System, 2022</td>
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<td>Corruption and Development, Anti-Corruption Interventions for Poverty Reductions, Realization of MDGs and Sustainable Development, 2009</td>
</tr>
<tr>
<td>Online Drafting of Integrity Plans, BiH</td>
</tr>
<tr>
<td>State Anti-Corruption Program of Uzbekistan for 2021-2022</td>
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### ANNEX IV: STAKEHOLDERS CONTACTED DURING THE EVALUATION

<table>
<thead>
<tr>
<th>Number of stakeholders</th>
<th>Type of stakeholder</th>
<th>Sex disaggregated data</th>
<th>Country(ies)</th>
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<tbody>
<tr>
<td>4</td>
<td>UNODC</td>
<td>Male: 3</td>
<td>Austria, Serbia, and Uzbekistan</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Female: 1</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Partner organization</td>
<td>Male: 1</td>
<td>USA</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Female: 1</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Cooperating partner</td>
<td>Female: 1</td>
<td>China</td>
</tr>
<tr>
<td>11</td>
<td>Government recipient</td>
<td>Female: 5, male: 6</td>
<td>Albania, BiH, Iran, Kazakhstan, Kyrgyzstan, Montenegro, Serbia, Turkey, and Uzbekistan</td>
</tr>
<tr>
<td>6</td>
<td>Academia</td>
<td>Male: 6</td>
<td>China, France, Russia, Serbia, UK, and USA</td>
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</tbody>
</table>

**Total: 24**