



FINAL
INDEPENDENT PROJECT EVALUATION

**STRENGTHENING THE FINANCIAL
INVESTIGATION CAPACITY TO
COMBAT MONEY LAUNDERING
ARISING FROM TRAFFICKING IN
PERSONS AND SMUGGLING OF
MIGRANTS**

XAMW33
MARCH 2023



UNODC

United Nations Office on Drugs and Crime

This independent evaluation report was prepared by an evaluation team consisting of Mr. Rani Khoury (Lead Evaluator) and Dr. Firas Murrar (Substantive Expert). The Independent Evaluation Section (IES) of the United Nations Office on Drugs and Crime (UNODC) provides normative tools, guidelines, and templates to be used in the evaluation process.

The Independent Evaluation Section of the United Nations Office on Drugs and Crime can be contacted at:

United Nations Office on Drugs and Crime
Vienna International Centre
P.O. Box 500
1400 Vienna, Austria
Telephone: (+43-1) 26060-0
Email: unodc-ies@un.org
Website: www.unodc.org/evaluation

Disclaimer

Independent Project Evaluations are scheduled and managed by the project managers and conducted by external independent evaluators. The role of the Independent Evaluation Section (IES) in relation to independent project evaluations is one of supervision, quality assurance, control, and support throughout the evaluation process, but IES does not directly participate in or undertake independent project evaluations. It is, however, the responsibility of IES to respond to the commitment of the United Nations Evaluation Group (UNEG) in professionalizing the evaluation function and promoting a culture of evaluation within UNODC for the purposes of accountability and continuous learning and improvement.

The views expressed in this independent evaluation report are those of the evaluation team. They do not represent those of UNODC or of any of the institutions or Member States referred to in the report. All errors and omissions remain the responsibility of the evaluation team.

All findings and recommendations as well as the management response pertain solely to the UNODC project/programme being evaluated and is not in any way targeted to Member States, implementing partners or other entities that took part in this project/programme.

© United Nations, March 2023. All rights reserved worldwide.

The designations employed and the presentation of material in this publication do not imply the expression of any opinion whatsoever on the part of the Secretariat of the United Nations concerning the legal status of any country, territory, city, or area, or of its authorities, or concerning the delimitation of its frontiers or boundaries.

This publication has not been formally edited.

CONTENTS

CONTENTS	III
ABBREVIATIONS AND ACRONYMS	IV
MANAGEMENT RESPONSE	V
EXECUTIVE SUMMARY.....	VI
I. INTRODUCTION	1
BACKGROUND AND CONTEXT.....	1
EVALUATION METHODOLOGY	2
LIMITATIONS TO THE EVALUATION	3
II. EVALUATION FINDINGS	4
RELEVANCE.....	4
COHERENCE.....	6
EFFICIENCY.....	7
EFFECTIVENESS.....	9
SUSTAINABILITY.....	12
HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND	13
III. CONCLUSIONS	16
IV. RECOMMENDATIONS.....	17
V. LESSONS LEARNED AND GOOD PRACTICES	19
LESSONS LEARNED	19
GOOD PRACTICES	19
ANNEX I: TERMS OF REFERENCE	20
ANNEX II: EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES	30
ANNEX III: DESK REVIEW LIST	43
ANNEX IV: STAKEHOLDERS CONTACTED DURING THE EVALUATION.....	44

ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Full name/word
AML	Anti-money laundering
CFT	Combating the Financing of Terrorism
CLP	Core Learning Partner
EU	European Union
FATF	Financial Action Task Force
FGD	Focus group discussion
FI	Financial Institution
FIU	Financial Intelligence Unit
FO	Field office
GDP	Gross domestic product
IT	Information technology
LEA	Law enforcement agency
M&E	Monitoring & Evaluation
MENA	Middle East and North Africa
MVTS	Money or value transfer service
NRA	National Risk Assessment
ROMENA	Regional Office of the Middle East and North Africa
SDG	Sustainable development goal
SOM	Smuggling of migrants
STR	Suspicious transaction report
TIP	Trafficking in persons
ToT	Training of trainers
ToR	Terms of Reference
UNEG	United Nations Evaluation Group
UNODC	United Nations Office on Drugs and Crime

MANAGEMENT RESPONSE

Recommendations ¹	Management Response
<p>1. Management and Implementation Arrangements: It is recommended that UNODC Regional Office of the Middle East and North Africa (UNODC ROMENA) and UNODC Field Office (FO) in Algeria tailor future projects or activities in Algeria to the unique working modality of Algerian authorities, specifically during the design phase. This was not possible in this project, due to the late incorporation of Algeria, but should be part of the design of future projects or activities planned in Algeria</p>	Accepted
<p>2. Relevance and Effectiveness: It is recommended that the UNODC ROMENA and the project team advance the technical level of capacity building to become more specialized, such as a focus on virtual assets, and consider a thematic or sectoral capacity building approach, with a focus on practical vs theoretical training</p>	Accepted
<p>3. Cooperation and Effectiveness: It is recommended that the UNODC ROMENA and the project team expand the scope of future activities to include more regional countries in the project's activities, as well as involve receiving and sending countries in upcoming activities</p>	Accepted
<p>4. Efficiency: It is recommended that UNODC ROMENA and the project team take measures to ensure that no duplication occurs among beneficiaries attending the same workshop on multiple occasions in future activities, through better monitoring and reporting of workshops</p>	Accepted
<p>5. Sustainability: It is recommended for the UNODC ROMENA and UNODC FOs in the region to utilize the beneficiaries of the ToT activities conducted under this project to build the capacities of other practitioners in their countries and in the region in upcoming activities</p>	Accepted
<p>6. Gender Equality: It is recommended for the UNODC ROMENA and UNODC FOs to devise a gender equality plan to be integrated within the design of future projects in order to more effectively mainstream gender equality. Given that the sectors targeted by UNODC are largely male-predominant, especially in the MENA region, a gender equality plan, designed from the outset, is deemed needed to help encourage more female representation in project activities.</p>	Accepted

¹ 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.

INTRODUCTION

PROJECT DESCRIPTION AND OBJECTIVES

The project "Strengthening the Financial Investigation Capacity to Combat Money Laundering Arising from Trafficking in Persons and Smuggling of Migrants" (TIP/SOM) was a \$2.3 million project funded by the Kingdom of the Netherlands and implemented by the UNODC Regional Office for the Middle East and North Africa (ROMENA) over a period of 45 months, having extended the project twice during implementation. The original countries participating in the project included Egypt, Morocco, and Sudan, but due to donor requirements, Sudan was substituted with Algeria during implementation. The overall objective of the project was to increase the detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco, through (i) enhanced capacities, and (ii) improved cooperation.

PURPOSE, SCOPE AND METHODOLOGY OF EVALUATION

The purpose of this Final Independent Project Evaluation was to assess the extent to which the project objective and outcomes were achieved, and further assess the level of relevance, coherence, efficiency, effectiveness, and sustainability of the project during its entire cycle. The audience for this evaluation includes UNODC's senior management, the project team, recipient governments, and the donor. The evaluation findings are intended to inform and guide future programming, and to serve as a reference for all stakeholders who were involved in the project.

A mixed methods approach of qualitative and quantitative methods was utilized in this evaluation to ensure an inclusive methodology as well as triangulated findings that are substantiated based on sound data analysis. The evaluation methodology was composed of a comprehensive desk review of project documents and technical outputs, in-depth semi structured remote and in-person interviews with stakeholders, remote and in-person focus group discussions with beneficiaries, and observation of the project's final regional workshop. The main limitations of the evaluation included the unavailability and irresponsiveness of some stakeholders as well as the overrepresentation of men in law enforcement and government position in the region. To counter these limitations, the evaluation team ensured that voices were heard from all stakeholder categories and aimed as much as possible to include women in the field work of the evaluation. The evaluation team was composed of two male members: Rani Khoury, the evaluation expert, and Dr. Firas Murrar, the substantive expert, who together combine strong expertise in both evaluations and in the subject matter of the evaluation. Throughout the course of this evaluation, the evaluation team was committed to and adhered to the UNEG ethical standards.

MAIN FINDINGS

Relevance

The design of the project was based on a thorough analysis of the context of the intervention and on official requests by participating countries, which translated into a project that is relevant to the needs and priorities of stakeholders. The project was also able to respond to the emerging needs and priorities identified during implementation through a process of adaptive flexibility, thereby maintaining the strong relevance of the project throughout the project lifecycle. The objective and outcomes of the project were found to be in line with the priorities of the donor.

Coherence

The project was found to be in line with the strategic programming of the UNODC on both the regional and international levels, as well as being directly aligned with SDG16 and relevant to other SDGs. The project also

fitted well within UNODC's portfolio of projects in the region and was found to have built on and complemented other earlier and ongoing UNODC interventions in the region.

Efficiency

After beginning its 1st year on an efficient pace, the project faced considerable delays stemming from the COVID crisis that unfolded in March of 2020 and from difficult implementation in Algeria, that adversely impacted the efficiency of the project. Nevertheless, the project took several measures during implementation that helped raise the efficiency of the project, including the transition to remote activities and making use of idle time during lockdowns to produce a number of technical outputs, including a comprehensive training manual. The project was monitored well through a well-developed monitoring plan that included detailed annual reporting, as well as workshop reports, but the level of reporting of workshop results was inconsistent, and in at least one case, duplications were found among beneficiaries attending the same training sessions on multiple occasions, which negatively affected the efficiency of the project.

Effectiveness

The project was able to achieve its first intended outcome, resulting in higher capacities in participating countries to detect, analyze, and track money laundering cases, in particular the ones associated with TIP/SOM, but beneficiaries expressed the need for more practical and more advanced trainings in future activities. Having said that, the scope and magnitude of the capacity building activities varied significantly between the different participating countries, with Algeria receiving the least number of sessions, the majority of which were conducted remotely. The evaluation found a significant improvement in national-level coordination, as well as some improvements in regional cooperation, but less so in terms of international cooperation, which meant that the project was able to partially achieve its second outcome. The project contributed to its overall objective of increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes mainly in Egypt and Morocco, but less so in Algeria.

Sustainability

A host of sustainability measures was included in the design and delivery of the project, which has contributed to the sustainability of results. Such measures included ToT activities, technical outputs and training material which will continue acting as a reference for professionals in the field, and the project's technical support provided to countries to develop and finalize their anti-money laundering national risk assessments (NRA) which has a long-term impact. The evaluation found that stakeholders and beneficiaries are committed to continue working towards the results of the project after its end but require continued technical support.

Human Rights, Gender Equality, Disability Inclusion, and Leaving No One Behind

Human rights considerations were found to have been integrated within the design and implementation of the project, and no incidents of discrimination or any human rights violations were reported during project implementation; efforts were put to ensure that project activities are inclusive of all groups. Considerations of gender equality were included in the project design but given the predominance of males in the sectors targeted by the project, most beneficiaries and stakeholders were men. The project was found to uphold the promise of 'leaving no one behind' with respect to addressing various marginalized groups affected by TIP/SOM crimes, but there was no mention of disability inclusion in the project design or implementation.

MAIN CONCLUSIONS

The project's strong relevance to the needs and priorities of recipient governments and beneficiaries, and its coherence with other UNODC interventions in the region, was instrumental to gaining the commitment of stakeholders and enhancing the effectiveness of the project in its contribution to the project outcomes and outputs. Having said that, the effectiveness of the project varied between the participating countries, with a higher degree of effectiveness found in Egypt and Morocco than in Algeria, which can be explained through a number of factors that include the late start of the project in Algeria after it substituted Sudan in the project (due to donor's decision), the COVID crisis and weak IT infrastructure in Algeria, and the centralized working modality in the country which made it difficult to plan for and implement activities in country. But despite

some losses in efficiency resulting from the COVID crisis and from the project's work with Algeria, the project team were able to take specific measures that have helped raise the efficiency of the project following the crisis. The project was monitored well through a well-developed monitoring plan that included detailed annual reporting, but the level of reporting of workshop results was inconsistent, and in at least one case, duplications were found among beneficiaries attending the same training sessions on multiple occasions. Moreover, a number of sustainability measures of the project has contributed to the sustainability of results, but the continued provision of support remains required by participating countries.

MAIN RECOMMENDATIONS²

Management and Implementation Arrangements: It is recommended that the UNODC ROMENA and UNODC FO in Algeria tailor future projects or activities in Algeria to the unique working modality of Algerian authorities, specifically during the design phase. This was not possible in this project, due to the late incorporation of Algeria into the project but should be part of the design of future projects or activities planned in Algeria. In other words, the unique and centralized working modality in Algeria should be taken into account during the design stage in order to account for challenges and risks arising from such a modality. Moreover, UNODC should ensure that suitable management, administrative, and implementation arrangements are in place to support the smooth implementation of future activities of the project in Algeria. This also includes establishing clear lines of communication and implementation modalities with Algerian authorities. All this will help minimize disruptions to the planning and implementation of activities in the country which will in turn minimize the adverse impact that such disruptions have on the project's overall efficiency and effectiveness.

Relevance and Effectiveness: It is recommended that the UNODC ROMENA and the project team further advance the technical level of capacity building to become more specialized, such as trainings on the management of virtual assets, with a focus on practical vs theoretical training. Given that this project built a solid base of technical capacity among practitioners in the region, upcoming activities should become more specialized tailoring trainings to specific sectors (LEAs, FIs, etc) to maintain the relevance of future capacity building activities and respond to beneficiaries' developing needs. Moreover, it is recommended to further focus on the topic of virtual assets (their seizure, confiscation, and management) in future projects and activities and effectively address the legal and institutional challenges and risks associated with their use in the region, especially with regards to cryptocurrencies. This is expected to maintain the strong relevance of UNODC programming in the region.

Cooperation and Effectiveness: To further enhance regional and international cooperation, it is recommended that the UNODC ROMENA and the project team expand the scope of future activities to include more regional countries in the project's activities, as well as involve receiving and sending countries in upcoming activities. Having a larger scope of countries at the design stage allows for more resources for more effective planning for regional activities that better contribute to regional coordination.

MAIN LESSONS LEARNED AND GOOD PRACTICES

The main lessons learned from the experience of the project is to carefully assess and plan for the feasibility of implementing a project in each of the participating countries, and make sure that appropriate administrative and management arrangements are in place to facilitate implementation. This lesson relates to the project's experience in working with Algeria which carried a host of challenges partly due to the working modality of Algerian authorities.

A number of good practices were identified from the project's experience including the project's efforts to keep providing support to Sudan utilizing its own resources, despite of the donor's decision to halt operations in the country, which is considered to be a good practice related to the promise of 'leaving no one behind'. Moreover, the project's unique focus on the financial dimension of TIP/SOM crimes is considered a good practice in terms of enhancing the coherence and complementarity of the UNODC's portfolio of projects in

² 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.

the region. Another good practice was the adaptive responsiveness of the project in terms of being able to effectively and swiftly respond to arising needs and priorities identified during implementation. Finally, the project's response to the COVID crisis is considered to be a good practice in terms of the measures taken to minimize the loss in efficiency resulting from the crisis.

BACKGROUND AND CONTEXT

OVERALL CONCEPT AND DESIGN

The project "Strengthening the Financial Investigation Capacity to Combat Money Laundering Arising from Trafficking in Persons and Smuggling of Migrants" (TIP/SOM) was a \$2.3 million project implemented by the UNODC Regional Office for the Middle East and North Africa (ROMENA) over a period of 45 months, having extended the project twice during implementation. The original project beneficiary countries included Egypt, Sudan, and Morocco, but due to donor requirements, Sudan was substituted with Algeria during the 1st year of the project's implementation of the project³.

The main objective of the project was to increase the detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria and Morocco, through enhanced capacities (outcome 1) and improved coordination (outcome 2). The project's objective is directly linked with SDG16, especially goals 16.1m and is relevant to other SDGs. The project counterparts included the FIUs and project beneficiaries which included law enforcement, prosecution and judiciary authorities and financial institutions in each of the countries

CONTEXT

The project was implemented in three North African countries: Algeria, Egypt, and Morocco, but also included other regional countries in some of its regional activities. These three countries have various degrees of development in the topic of the project, which meant that the project put effort in tailoring country-specific activities to each of these countries.

PURPOSE AND SCOPE

The purpose of this Final Independent Project Evaluation was to assess the extent to which the project objective and outcomes were achieved, and further assess the level of relevance, coherence, efficiency, effectiveness, and sustainability of the project during its entire life cycle. Human rights and gender considerations were also taken into account during this evaluation in addition to the principle of leaving no one behind. The evaluation covered the total duration of the project, from its inception in January 2019 up until its closure in September 2022, as well as all its geographic cover that focused on Algeria, Egypt, and Morocco. The audience for this evaluation includes the donor, UNODC's senior management, the project team, and recipient governments. The evaluation findings are intended to inform and guide future programming in the area of combating money laundering arising from human trafficking and smuggling of migrants, including through parallel financial investigations.

THE COMPOSITION OF THE EVALUATION TEAM

The evaluation team for this assignment was composed of two male members: Rani Khoury, the evaluation expert, and Dr. Firas Murrar, the substantive expert. Rani is an economist and evaluation professional with over 10 years' experience in conducting evaluations across the MENA region, while Dr. Firas⁴ is an expert in financial investigations with over 18 years of experience in the Palestinian FIU, which he is now heading.

³ In December 2018, demonstrations broke out in several cities in Sudan, including the capital, which led the removal of President El Bashir in April 2019. Following the events, the Dutch Ministry of Foreign Affairs requested UNODC to suspend project implementation in Sudan in July 2019

⁴ Dr Firas is engaged with MENAFATF, a partner organization for this project. But his role in MENAFATF is voluntary, not paid, and not related to the project.

EVALUATION METHODOLOGY

In line with the UNODC evaluation standards and UNEG norms and standards, a mixed method approach of qualitative and quantitative methods was utilized in this evaluation to ensure an inclusive methodology as well as triangulated findings that are substantiated based on sound data analysis. Overall, the evaluation relied on the results of (i) a comprehensive desk review, (ii) in depth semi structured interviews, (iii) focus group discussions, and (iv) observations. Throughout the course of this evaluation, the evaluation team was committed to and adhered to the UNEG ethical standards. The evaluation team was committed towards the UNODC and towards the stakeholders and beneficiaries of the project to adhere to the highest level of ethical standards.

At the outset, the evaluation team conducted a desk review of all documents received from the project team in addition to other documents pertaining to UNODC and the Independent Evaluation Section (e.g. Evaluation Handbook). A full list of documents reviewed is presented in annex III and generally includes project design and project revision documents, annual progress reports and narrative reports and overall publications and technical products of the project. Based on a review of these documents, the evaluation team formulated preliminary findings that were presented in the inception report and facilitated the fieldwork for this evaluation. Findings of the desk review constituted an important source of findings in this evaluation.

The desk review also facilitated the development of the evaluation data collection tools that were used during the data collection phase as well as identifying stakeholders for the field work. The evaluation tools consisted of in-depth semi-structured remote interviews with project stakeholders, focus group discussions with project beneficiaries, and observation of the project's final regional workshop. The evaluation tools can be found in annex II of this report. Parts of the data collection was conducted face-to-face during the evaluators' field mission to the final regional workshop of the project, while the remaining field work was conducted remotely.

Remote and face-to-face In-depth semi-structured interviews were used to collect information from various project stakeholders including the project team, UNODC staff, donor, and representatives of recipient countries. This instrument was used to collect qualitative information about the overall performance of the project. The reason for utilizing semi-structured interviews for this evaluation was that they allow for an in-depth discussion around the evaluation questions. Depending on the target group, different dimensions were discussed and data collected. The evaluation team tried to the extent possible to involve as many female stakeholders as possible for the interviews.

Remote and face to face Focus Group Discussions were used to collect information from project beneficiaries with the aim being for participants to discuss and debate issues with each other, with the facilitator taking the role of guide. FGDs provided a platform through which beneficiaries from various trainings of the project shared their experience in the project. FGDs allowed beneficiaries to freely discuss various issues in depth and variety that would not be possible through surveys. FGDs were directed and semi-structured, in order to obtain the required information in a limited amount of time. FGDs were also flexible enough to encourage participants to share their personal experiences and perceptions in the project. During the FGDs, the evaluation team paid special attention to providing adequate space for women beneficiaries to discuss their views and experiences of the project.

Observation was used to collect observations during the final regional workshop organized by the project in Sharm El Sheikh, Egypt, during the beginning of September on the priorities and challenges regarding combating proceeds from TIP/SOM crimes. The evaluation expert attended this 3-day meeting and recorded observations of the event, the attendees and their interactions as they went about their activities. While this tool is not a structured tool per se, it has helped the evaluation team in gathering insights which could not be obtained through the more structured tools referred to above. Special attention was paid to the presence and interactions of female stakeholders during the workshop.

The key data sources for this evaluation consisted of the project team, UNODC staff, representatives of government recipients, and project beneficiaries, in addition to key project documents including the project design, annual progress reports, and key products and publications of the project. A mixed sampling strategy

was utilized for the selection of informants for the fieldwork. A purposive sampling strategy was used to select informants of the in-depth semi structured interviews, while a stratified random sampling strategy was used for the selection of FGD participants, according to the target group. This sampling approach helped the evaluation team reach all stakeholder categories and helped maximize the number of female stakeholders contacted during the field work. Overall, the evaluation team carried out 14 in-depth semi structured interviews (57% of which were with females) and holding FGD with 26 beneficiaries (19% of whom were females). A list of the 40 stakeholders and beneficiaries contacted in this evaluation can be found in annex IV.

After the completion of the fieldwork, the evaluation team commenced with the analysis phase, which constituted a reasoned assessment of facts and evidence to provide answers to the evaluation questions, which were articulated according to cause-and-effect statements. An overall assessment of the project is presented in this final report, after having ensured that findings and conclusions were fully grounded in facts and triangulated from more than one data source. It was ensured that both conclusions and recommendations of this evaluation are not systematically biased towards positive or negative views. The analysis of data paid special attention to gender issues, and whenever different views by males and females were observed, this has been included in the analysis and reporting.

All data analysis in this evaluation was based on triangulation, which generally refers to the use of multiple approaches, methods and sources for data collection and analysis to verify and substantiate data and information. For this evaluation, triangulation was achieved by (i) combining four main methods of data collection (document review, interviews, FGDs, and observations), (ii) including different stakeholder groups as key informants for this evaluation, and (iii) evaluator triangulation given that the evaluation team consists of two independent evaluators.

LIMITATIONS TO THE EVALUATION

Limitations to the evaluation	Mitigation measures
Unavailability / irresponsiveness of some beneficiaries contacted during the field work.	The evaluation team implemented the bulk of the FGDs with beneficiaries, face-to-face, during the team's observation visit to the project's final regional workshop to mitigate the possibility of nn responsiveness during the remote field work. Moreover, the evaluation team utilized back up samples for the remote FGDs to ensure that the evaluation takes into account the originally intended stakeholder groups. Overall, the beneficiaries met with in the FGDs were from a variety of professions that were covered under the project and were deemed sufficient for the purposes of this evaluation.
Overrepresentation of men in law enforcement and government positions, since men outnumber women as criminal justice actors and police personnel globally, and specially in the MENA region.	This is a main reason why the evaluation team opted to employ a purposive sampling strategy (for informants) and a stratified sampling strategy (for survey respondents) in order to reach out to female stakeholders and any marginalized groups, to arrive at a representative analysis. This has resulted in a 30% female share of contacted stakeholders.

II. EVALUATION FINDINGS

RELEVANCE

EVALUATION QUESTION:

- To what extent has the project been relevant to stakeholders' needs and priorities?

Finding 1: The design of the project was based on a thorough analysis of the context of the intervention and on official requests by participating countries, which translated into a project that is relevant to the needs and priorities of stakeholders. The project's objective and outcomes were in line with the priorities of the donor.

The rationale of the project was based on findings from a number of international and regional and national technical reports, such as the 2018 MENAFATF report on Financial Flows from Human Trafficking. Such reports found that very little is known on how proceeds from TIP and SOM crimes are laundered, and that despite the increase in investigations and prosecutions of human trafficking and smuggling of migrants cases, the cases in which a parallel financial investigation had been initiated was still very low. Moreover, studies pointed towards the need to better understand and detect TIP and SOM cases through analyzing the financial activities of the various factors involved. The studies also showed that financial institutions have a limited understanding of the financial aspects of TIP and SOM crimes.

Furthermore, the project design highlighted that number of suspicious transaction reports (STRs) submitted by financial institutions (FIs) and money or value transfer services (MVTs) in relation to TIP/SOM crimes was relatively low. The low number of STRs was attributed to the lack of awareness among FIs and MVTs on TIP/SOM crimes and common practices and methods used by criminals to launder their proceeds. Another reason is the overall low level of communication and coordination between FIs and MVTs on the one hand, and FIs and FIUs on the other hand.

Therefore, the rationale of the project was developed to respond to these issues: enhancing the financial analysis and investigation capacities of law enforcement and prosecution authorities, financial institutions, and FIUs would increase the level of understanding, detection, and tracking of the different laundering mechanisms used and subsequently also about the crimes and criminals involved. And given the transnational nature of such crimes, a regional and international cooperation dimension was integrated within the project design. The evaluation has found that the project's logical framework or results chain is logical, with the main objective logically stemming from the project's two main outputs. And in turn, the project's activities and outputs were found to be consistent with the project's outcomes and objective.

The project's outcomes, and related outputs, were designed based on the various issues uncovered during the initial assessment. The following table was prepared by the evaluation team to display how the shortcomings identified during the design phase correspond with the intended outcomes resulting from the project.

Table 1: Identified shortcomings and designed outcomes

Identified Shortcomings	Relevant Outcomes
Very little is known on how proceeds of TIP/SOM crimes are laundered	Outcome 1: Relevant authorities in the participating countries are capacitated to detect, analyze, and

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

Relatively low number of STRs submitted by FIs and MVTs in relation to TIP/SOM	track (an increased number of) money laundering cases, in particular the ones associated with TIP/SOM
Lack of awareness among FIs and MVTs on TIP/SOM crimes and common methods used to launder proceeds.	
Lack of communication between FIs and MVTs, between FIs and FIUs, and between LEAs and FIUs both within and between jurisdictions.	Outcome 2. Enhanced inter-agency, regional, and international cooperation within and among Egypt, Morocco, an Algeria as well as with other countries within and beyond the region.

Source: Developed by the evaluation team based on project design documents

The project was also found to be relevant to the priorities of the three participating countries which had requested UNODC's technical assistance to enhance their financial investigation capacity and expressed their commitment to the implementation of the proposed activities. An analysis of the situation of each of the three participating countries was also included into the design of the project. In Egypt, a comprehensive legal framework to combat TIP/SOM was completed in 2016, paving the way for actual detection and enforcement. Moreover, the country is still largely a cash-based economy, and along with limitedly trained staff at financial and non-financial reporting agencies, this leads to numerous possibilities for money laundering crimes. Similarly in Morocco, a law on combating human trafficking was endorsed in 2016, paving the way for detection and enforcement. Moreover, Morocco was identified as playing a crucial role in countering migrant smuggling along the West African routes. Algeria has been implementing its National Anti-Trafficking action plan for 2019-2021 which coincided with the project's activities. The Algerian Economy is at risk of exploitation by organized criminal groups give that around 40% of its GDP is an informal cash-based economy.⁵

This illustrates how the project came at an appropriate time for these countries, to support them to enforce newly endorsed regulations and implement plans and strategies on TIP/SOM, at a time when such crimes are increasing.

The project's relevance was supported by conversations held with beneficiaries during focus groups and with representatives of government recipients during interviews. Government recipients indicated that the phenomenon of TIP/SOM is a significant problem in their countries, which are considered to be mainly transit countries for these crimes. According to one government recipient and some of the beneficiaries, the project has helped their countries enforce newly developed legislation on countering financial proceeds from crimes through the various trainings it offered. All stakeholders contacted in this evaluation indicated that there was a significant need for this project in their respective countries.

Representatives from the Ministry of Foreign Affairs in the Netherlands and from the Dutch embassy in Cairo both confirmed the relevance of the project to the policy framework under which they operate. Migration policy is a main pillar of Dutch assistance, and countering irregular migration and SOM/TIP crimes, falls specifically within this agenda. Countering TIP/SOM crimes is a main outcome under the donor's theory of change and results framework, so the project's objective and outcomes align well with that of the donor's. According to one of the donor representatives, "not only are the project's objectives aligned with ours, but the approach of the project is unique in its focus on the financial side of TIP/SOM crimes compared to other projects we support"

Finding 2: The project responded to the emerging needs and priorities identified during implementation through an adaptive flexibility, thereby maintaining the strong relevance of the project.

Not only was the project designed based on an analysis of needs, but the project tailored some activities to specific emerging needs and priorities identified during implementation. One major example is the development of four workshops related to the seizure, confiscation, and management of virtual assets, including crypto currencies, in addition to one study tour conducted in the US on this topic, after the project identified the issue of virtual assets to be a priority among stakeholders, who indicated that they would like

⁵ Project document

to have a better understanding of the issue, especially in terms of creating wallets for seized virtual assets. According to one beneficiary, "we were noticing that there is an increase in crypto assets while working on cases... we found cases involving Bitcoin, the major crypto currency, but when cases went to court, we noticed there is a gap and subsequently a need to deal with virtual assets". Despite not being part of the original design of the project, an adaptive flexibility was shown by the project team in making the requests of stakeholders a reality. And the flexibility offered by the donor enabled the project to design and carry out the activities during the implementation of the project. All stakeholders met with during this evaluation indicated that the project team has been very responsive and flexible in dealing with their requests and arising needs. According to one stakeholder, "the UNODC is the most responsive out of all agencies we work with... whenever we have a need, there is an immediate response from them". The responsiveness of the project to the identified needs of stakeholders was also praised by a donor representative who mentioned that "the project developed itself over the past few years through responding very well to identified needs".

COHERENCE

EVALUATION QUESTION:

- To what extent has the project delivered results in line with organizational, regional, and international priorities

Finding 3: The project was in line with the strategic programming of UNODC on the regional and international levels, as well as with the SDGs

The project's rationale and objectives were in line with the UNODC Strategy (2021-2025), especially regarding the 2nd thematic area of 'Preventing and Countering Organized Crime'. The project is channeled through UNODC's Anti-Corruption Program for the MENA region that falls under the umbrella of the Regional Programme for the Arab States to Prevent and combat Crime, Terrorism and Health Threats, and to Strengthen Criminal Justice Systems, in line with International Human Rights Standards (2016-2022), which is the strategic framework and overall umbrella of UNODC work in North Africa and the Middle East. Specifically, the project falls under Sub-Programme II of the regional program: Combating Corruption and Financial Crimes. Moreover, the project was found to be in line with the UNODC strategic vision for Africa 2030, especially with regard to combating organized crime.

The project is directly aligned with SDG 16: promote just, peaceful, and inclusive societies, especially with regard to goal 16.4 'significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets, and combat all forms of organized crime' and goal 16.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". In addition to SDG 16, the project was found to be also indirectly aligned with SDG 8, target 8.7: Take immediate and effective measures to eradicate forced labour and end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025, end child labour in all its forms; and with SDG 16, target 16.2: End abuse, exploitation, trafficking and all forms of violence against and torture of children.

Finding 4: The project fitted well within UNODC's portfolio of projects in the region and was found to have built on and complemented other earlier and ongoing UNODC interventions in the region

The project was found to be part of a coherent effort by the UNODC in the region, building on and complementing other UNODC interventions. For example, hundreds of officers including prosecutors and financial analysts have been trained under the UNODC project "Supporting measures to combat corruption, money laundering and to foster asset recovery in Egypt" (2011-2016). UNODC also supported the automation

of the financial analysis process through deploying an electronic anti-money laundering system (goAML) at the FIU in Egypt. Further, UNODC implemented a host of activities under the 'Global Action to Prevent and Address Trafficking in Persons and the Smuggling of Migrants' and under the 'Strengthening the framework of the Arab Region to Prevent and Combat Human Trafficking' in the region, including the three participating countries. UNODC has also supported Egypt and Morocco to plan and implement strategic national counter-trafficking and counter smuggling efforts through a prevention, protection, prosecution and partnership approach under the aforementioned Global Action, with the objective of strengthening the capacities of government authorities and civil society organizations. UNODC has also supported Egypt and Algeria to improve regional security through effective collaboration and action against transnational organized crimes involved in TIP/SOM between North African countries under the regional project "The North Africa Cooperation on Migrant Smuggling and Trafficking in Persons Project. In Algeria, UNODC provides technical support on countering smuggling of migrants via the project on "Strengthening the Transnational Response to Trafficking in Persons and Smuggling of Migrants in West, North, and East Africa.

While all of these projects focused on traditional methods to countering SIM/TOP crimes in their capacity building activities, the current project under evaluation complemented these efforts through focusing on the financial dimension of such crimes, thereby ensuring a coherent approach in addressing this issue in North African countries.

EFFICIENCY

EVALUATION QUESTION:

- To what extent has the project delivered outputs in a timely and efficient manner?

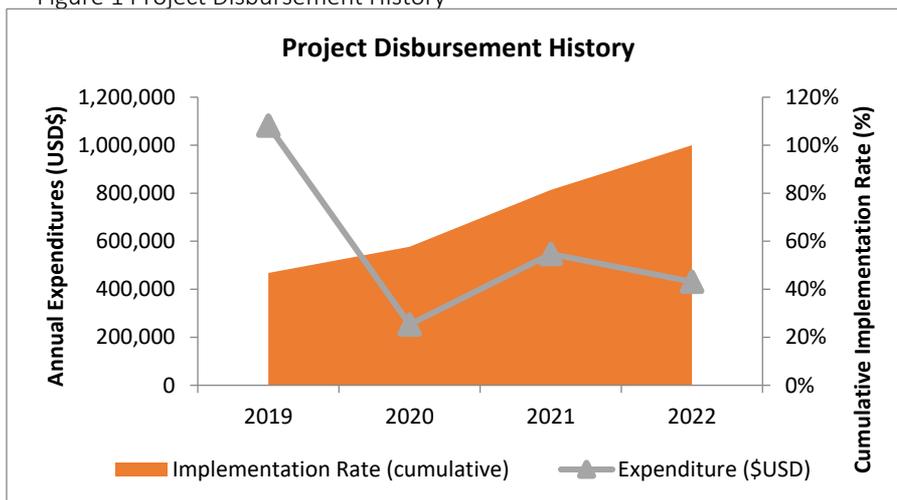
Finding 5: After beginning its 1st year on an efficient pace, the project faced considerable delays stemming from the COVID crisis that unfolded in March of 2020 and from difficult implementation in Algeria.

The project began its first year on an efficient pace, with 20 activities implemented in the 1st year of the project (7 in Egypt, 11 in Morocco, and 2 in Sudan) in addition to the production of various technical outputs including guidelines and technical reports. But after this efficient start of the project in 2019, the project faced considerable delays stemming from the COVID crisis that unfolded in March 2020, as well as from substituting Sudan with Algeria based on the donor's request to stop all project activities in Sudan. The COVID crisis led to a significant impact on the social and economic life in the three participating countries through halting travel, instituting nation-wide lockdowns and prohibiting face-to-face activities and trainings, which significantly disrupted the project's plans. Many of the planned activities for 2020, such as the ToT program, could not be implemented. Also during this time, the project's main national counterparts in the participating countries were primarily focusing on the implementation of preventive and response measures to the COVID crisis.

Other than the delays caused by the COVID crisis, some delays were experienced by the project in implementing activities in Algeria. As mentioned earlier, Algeria was incorporated as a participating country during the late stages of the 1st year of the project's implementation to replace Sudan which was removed from the project based on a request from the donor. This led to a slow start to implement activities for Algerian counterparts. Moreover, a host of factors led to delays in the progress of implementation in Algeria including changes in the Algerian government and in the concerned national counterparts as well as the working modality of Algerian authorities which required that all approvals on organizing events should be obtained from the Ministry of Foreign Affairs separately for each event in a centralized decision-making system. In addition, two last minute postponement requests of project activities further affected implementation in Algeria.

For these reasons, the project was revised twice extending the implementation of the project, without cost, to a total of 45 months (January 19 to September 2022), instead of the originally planned 24 months (January 19 to December 2020). As can be seen from the adjacent figure, the rate of implementation dropped significantly in 2020 compared to 2019, before improving again in 2021.

Figure 1 Project Disbursement History



Source: Developed by the evaluation team based on project design

Finding 6: The project took several measures during implementation that helped raise the efficiency of the project

Despite encountering delays that were outside of the hands of the project team, the project was able to implement a number of measures that have helped raise the efficiency of the project in the face of these delays. A major example is the project's success in implementing virtual workshops and remote technical consultations for beneficiaries across the three countries given the impossibility of holding face-to-face sessions at the time of the crisis in 2020 and 2021. Overall, the project carried out a total of 11 virtual workshops. While it took some time to adapt at the beginning of the crisis, these virtual activities have helped the project generate some financial savings which were then utilized to expand the scope of project activities to cover more beneficiaries. Moreover, the virtual activities were easier to prepare for so the pace of implementation accelerated once the project adapted to the new remote modality. Furthermore, the project team was able to produce a number of technical outputs in the project during this period, thereby taking advantage of this idle time which has helped raise the efficiency of the project. During this time, the project produced manuals, guidelines, and training materials with a view to be used at a later stage during the postponed activities. It is important to note here that the project did its best not to sacrifice the quality of its activities through remote implementation. For example, the project team made the decision to postpone the ToT component of the project, rather than implementing it remotely, given that ToT activities are highly interactive in nature and require face-to-face workshops to achieve their desired goals. While this had slightly affected implementation plans, it helped ensure a high-quality ToT for beneficiaries.

Finding 7: The project was monitored well through a well-developed monitoring plan that included detailed annual reporting, as well as workshop reports, but the level of reporting of workshop results was inconsistent, and in at least one case, duplications were found in beneficiaries attending the same training sessions.

In terms of monitoring, the project produced high quality annual monitoring reports which provided comprehensive information on the progress of the project across all countries and challenges or bottlenecks faced during implementation, and described progress achieved in detail. Moreover, workshop/training reports were produced for each workshop/training implemented under the project, with some showing the results of post training satisfaction surveys of attendees. Nevertheless, the workshop reports were inconsistent in the information provided and level of details included. While some workshop reports were comprehensive and showed post-training survey results and lists of attendees, other workshop reports merely contained a narrative of the workshop activities without any indication on the feedback of beneficiaries and who in fact attended. All the reports of the workshops done in 2019 were very comprehensive and elaborative and consistent, but the inconsistency appeared later on in the workshops done in 2020-2022 where the reporting ranged from being very comprehensive to only a narrative in some reports. Furthermore, the project conducted internal meetings with UNODC management and external meetings with national counterparts

from the participating countries and with the donor to discuss the progress made in implementation and any arising challenges.

According to a meeting held with one of the project stakeholders, it was pointed out that some beneficiaries attended the same training more than once during the course of the project, mainly due to the targeted organization delegating the same person to attend the trainings whereas the intention was to have different staff members from the same organization. In other words, there was a duplication in some of the beneficiaries in one of the project's trainings which was intended to be provided over a number of sessions for different beneficiaries of the same target group. This was confirmed by the evaluation team via a review of the lists of attendees of the various project activities. Such a duplication negatively impacts the efficiency of the project, as resources could have been better utilized to increase the coverage of the training to a wider audience or implement other trainings for the same groups of beneficiaries.

EFFECTIVENESS

EVALUATION QUESTION:

- To what extent did the project achieve its intended outcomes and objective?

Finding 8: The project was able to achieve its first intended outcome resulting in higher capacities in participating countries to detect, analyze, and track money laundering cases, in particular the ones associated with TIP/SOM, but beneficiaries expressed the need for more practical and more advanced trainings.

A total of 38 capacity building activities were implemented over the lifetime of the project, consisting of capacity building workshops for representatives of FIUs, FIs, and law enforcement from nine countries in the MENA region, with a focus on Egypt and Morocco. Capacity building activities covered a number of different topics related to financial investigation of TIP/SOM and open-source investigation in the cases of TIP/SOM. A total of 759 participants attended the trainings of the project over its first two years, of which 146 were females (19.2%). Furthermore, the project supported Egypt in finalizing its anti-money laundering national risk assessment. In addition to these capacity building activities, the project produced a number of technical documents throughout this period, including a joint report with MENAFATF on "Combating Money Laundering of Proceeds Gained from TIP/SOM crimes", guidelines and manuals including a comprehensive training manual and guidelines on financial red flag indicators, and other technical outputs.

There has been some evidence on the achievement of this outcome. For example, the 2019 annual report of the FIU in Morocco indicated there has been a substantial increase in the number of requests submitted by law enforcement authorities to conduct parallel financial investigations compared to previous years. In Egypt, more attention is being given to undertaking financial investigation in parallel to the conventional criminal investigation, and more focus was given to the role of financial institutions and the importance of the suspicious transaction reports they submit to the FIU in identifying money laundering cases. Furthermore, the evaluation reports of some of the capacity building activities showed that the satisfaction of participants on the workshops and the relevance of the training to their work were scored above 4 out of a 5-point scoring system on average indicating that the training was relevant to their profession and added to their knowledge and signified that they be likely using the skills acquired in their jobs in the coming period.

In addition, an expert review of the training manuals and materials found that they are appropriate and effective in building capacities. The training manual on investigations related to TIP/SOM crimes was found to be linked with the requirements of the standards issued by the MENA Financial Action Task Force (FATF), in particular the requirements of recommendations 30 and 31 dealing with the powers of law enforcement authorities and how to conduct investigations, especially parallel financial investigations of money laundering crimes. Moreover, the technical paper on red flag indicators that was produced by the project is strongly

correlated to the requirements of the MENA FATF standards, especially recommendation 20 dealing with reporting of money laundering and terrorist financing crimes.

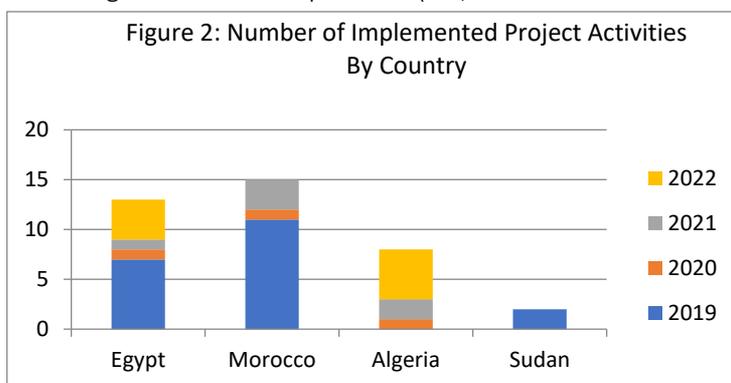
According to conversations held with beneficiaries during FGDs, the series of capacity building workshops has indeed built their capacities in the detection, analysis and tracking of money laundering crimes related to TIP/SOM. Most beneficiaries explained that their level of awareness, understanding and knowledge on the issue has deepened as a result of the project. According to one beneficiary, "I now know how to link suspicion with facts in order to reach the required evidence". Another beneficiary indicated that "the focus on financial investigations has helped us see and uncover the whole network of criminals involved in a certain TIP/SOM crime... Reading financial statements alone can uncover network members". According to another beneficiary "before the project, our research and investigation methodology depended on the traditional framework. But now, the project opened our eyes on non-traditional methods".

The increased capacity of beneficiaries was not only a result of these capacity building sessions but was also a result of technical assistance provided to the participating countries, especially with regard to implementing or updating the National Risk Assessment (NRA). According to one stakeholder (Egypt government recipient), "the UNODC helped us in developing the NRA for Egypt, mainly through the provision of technical expertise that helped ensure our methodology was on the right track". Moreover, the project held a workshop on NRA with all stakeholders which have helped ensure that stakeholders were on the same page on this issue.

Having said that, some of the beneficiaries indicated their desire to have more advanced and more practical, vs theoretical, training content in future capacity building activities, especially that they are now well versed in the basic theoretical content that was being provided in the project's workshops. This is evidence that the project was effective in building a solid knowledge base among practitioners, and therefore, future activities should build on this base with more advanced trainings that are more practical (i.e., based on case studies).

Finding 9: The scope and magnitude of capacity building activities varied significantly between the different participating countries

A main challenge that faced the project was working with countries having varied degrees of development on the issue of parallel financial investigations and NRA development. An associated challenge was working in the different contexts of participating countries, some of which were harder to operate than others. This



Source: Developed by the evaluation team based on project design

meant that the project's activities were not equally distributed across the participating countries. As the adjacent figure shows, the project implemented 8 activities in Algeria during the course of the project, compared to 15 activities implemented in Morocco, and 13 in Egypt. Moreover, the majority of activities implemented in Algeria were implemented remotely while the majority of activities implemented in Egypt and Morocco were face-to-face, despite the fact that many of the activities implemented in Algeria were in 2022, well after the Algerian government lifted all COVID related restrictions. This was mainly due to the difficulty faced by the project team in arranging in-person activities in Algeria. The reasons for the low number of activities implemented in Algeria included a late start in kicking off the project in Algeria, turnover in the relevant Algerian authorities, weak IT infrastructure, and a centralized decision-making system that made it difficult to plan for and implement activities in a smooth manner. More importantly, Algeria was incorporated late into the project, meaning that the original design did not include it, and it was exposed to the project's activities for a shorter time span than the other participating countries. And this was ultimately due to the donor's decision to suspend project activities in Sudan.

Finding 10: The project was able to partially achieve its second outcome; the evaluation found a significant improvement in national-level coordination, some improvements in regional cooperation, but less so in terms of international cooperation.

The project was found to have significantly contributed to improving national-level coordination in participating countries, mainly Egypt and Morocco. As mentioned above, the 2019 annual report of the FIU in Morocco indicated that there has been a substantial increase in the number of requests submitted by law enforcement authorities to conduct parallel financial investigations compared to previous year, which points towards an increased level of coordination and cooperation between law enforcement authorities and the FIU in Morocco. Moreover, the report indicated that the FIU in Morocco cooperated with 25 financial institutions concerning requests for information about financial transactions, with a notable increase in the number of these requests compared to previous years. In Egypt, the FIU joined the Egyptian National Coordinating Committee for Preventing and Combating Illegal Migration and Human Trafficking. The committee facilitates information sharing among national authorities to the committee and is therefore perceived as a national initiative to improve cooperation and information sharing. These examples provide evidence that the project has contributed to an enhanced level of national cooperation in Egypt and Morocco.

Other than these examples, conversations held with beneficiaries from both Egypt and Morocco indicated that the project has indeed contributed to enhancing cooperation among relevant stakeholders in each of these countries during national-level workshops held by the project that brought together a variety of concerned stakeholders. According to one Egyptian beneficiary, "it rarely happens that we, as the FIU, meet with LEAs. But the project made that happen on a number of occasions and this has helped form important relationships". In Morocco, the prosecution formed a special committee for money laundering stemming from human trafficking crimes, and this project provided the appropriate impetus to make that happen. Beneficiaries indicated that the degree of national-level coordination is now much higher than before the project.

Having said that, many of the beneficiaries indicated that they would like more regional cooperation activities from the project. The project's six regional workshops, in addition to the regional study on "Combating Money Laundering Derived from TIP/SOM Crimes", were the main platforms through which the project had contributed to enhanced regional cooperation. The regional typology study and its recommendations, which was developed by the MENA FATF, was adopted by the three participating countries with the support of the project and serves as a regional mechanism to foster information sharing on case studies of financial investigation in TIP/SOM cases among MENAFATF countries. Indeed, the regional typology study was discussed in four different MENAFATF plenary meetings and contributed to raising the priority of TIP/SOM crimes among regional countries. It is therefore perceived to be a regional initiative to improve cooperation and information sharing among regional countries, but no sharing of experiences under this mechanism was reported by beneficiaries. Moreover, the project supported the development of financial red flag indicators which was a result of regional cooperation in North Africa. Beneficiaries viewed the project's regional workshops as the main contributor to enhanced regional cooperation; according to one beneficiary, "peer-to-peer sharing of experiences in regional events have helped develop some informal cooperation between involved countries" and stakeholders indicated that such regional events brought stakeholders from different countries together. In some cases, the project was able to facilitate some meetings between concerned authorities from the beneficiary countries on TIP/SOM cases. But most beneficiaries indicated that the project's activities were not enough to significantly contribute to improved regional coordination. Indeed, the scope of regional activities in the project was less than the scope of national activities. According to one beneficiary, "we need to have more cooperation on the regional level because ultimately, [TIP/SOM] crimes are transnational". Beneficiaries also indicated that they would also like to have an improved coordination on the international level, i.e., with EU countries that are considered to be the recipient countries of these crimes. International-level cooperation, in this project, was limited to the provision of expertise from developed countries during national and regional workshops.

Finding 11: The project contributed to its overall objective of increased detection and reporting of suspicious transactions in order to disrupt financial resulting from TIP/SOM crimes mainly in Egypt and Morocco, but less so in Algeria.

In focus groups conducted with beneficiaries from Egypt and Morocco, all beneficiaries indicated that there has been an increase in the number of STRs in their countries over the past two years or so. Representatives of FIUs in these countries indicated that they have been receiving a higher number of STRs from relevant

entities. Not only that, but the quality of STRs being received has increased over the past few years. According to one beneficiary, "within the first few years of the project, we noticed an increased number of higher quality STRs. In some cases, law enforcement agencies are becoming better at detecting and reporting financial crimes". Moreover, beneficiaries indicated that there "unlike before the project, a parallel financial investigation is now being done to almost all criminal investigations related to TIP/SOM. Beneficiaries from both Egypt and Morocco confirmed that there has been a notable increase in the number of TIP/SOM cases having a parallel financial investigation. Furthermore, a major impact resulting from the project is that the prosecution in participating countries is now much more aware and knowledgeable of the importance of conducting parallel financial investigations to these crimes. Unfortunately, there is no data available to provide further evidence on the increased detection and reporting of suspicious transactions.

SUSTAINABILITY

EVALUATION QUESTION:

- To what extent are the benefits of the project likely to continue after it ends?

Finding 12: A host of sustainability measures was included in the design and delivery of the project which has contributed to the sustainability of results

The evaluation has found that the main activities of the project are inherently sustainable: the building of capacities, including through TOTs, the provision of technical support regarding NRAs, the production of technical documents, and the enhanced level of cooperation all have an element of sustainability embedded in them.

A main sustainable element of the project was the TOT activities carried out for FIUs and law enforcement and prosecution authorities. While the project had planned to implement these ToTs early on in the project, this could not be done given the restrictions imposed by the COVID crisis on holding face-to-face activities. Nonetheless, TOT workshops were completed in the three participating countries for financial analysts, law enforcement officers and prosecutors, who are expected to deliver training sessions on what they learned to staff of their respective entities. One beneficiary who attended a ToT session in Egypt indicated that she shared the knowledge gained from the project's activities with the compliance officer at the bank and then to a group of chief compliance officers from a number of different banks during a presentation on suspicious financial transactions. In Morocco, the financial analysts of the FIU who attended the ToT later took part in the development of a manual on suspicious financial transactions and then trained a number of financial analysts from various financial institutions on the manual, in cooperation with the central bank, leveraging the knowledge gained from the ToT workshop. Moreover, the project utilized beneficiaries of the TOT activities in subsequent capacity building activities. One example is utilizing a trainer from the Moroccan Ministry of Interior and a trainer from the Egyptian FIU to implement a training in Tunisia. Other than the ToTs, the capacity building sessions has contributed to enhancing the capacity of practitioners in the field who will continue to use the skills gained in their work.

Another sustainable element was the technical outputs produced by the project, which will continue acting as a reference for professionals in the field. A main example is the report outlining a list of money laundering red flag indicators associated with TIP/SOM crimes. The Central Banks of both Egypt and Morocco adopted the document and disseminated it to all banks and financial institutions in their countries. The report was also published on the websites of the Central Bank and FIU in each of these countries, to continue to act as a reference for practitioners. Other than this report, the project produced a number of other technical outputs which will help in harmonizing understandings of money laundering risks among various stakeholders and how to mitigate them. According to one beneficiary, "when we got back to our banks, we started to think how our policies could be reformed to cater to such red flags".

Furthermore, the project's support provided to countries to develop and finalize their anti-money laundering national risk assessments (NRA) has a long-term impact, considering that such assessments provide the mechanism on how to address risks related to money launderings on both the short and long terms. Under this project, technical assistance was provided to the Egyptian FIU to finalize the NRA and to the Algerian FIU to develop its NRA. Furthermore, the project provided technical expertise to continue supporting and developing the usage of the goAML system in Egypt, which will continue to be operational beyond the lifetime of the project.

Finding 13: Stakeholders and beneficiaries were found to be committed to continue working towards the results of the project after its end, especially ToT beneficiaries, but require continued support

A sense of ownership was exhibited by stakeholders and beneficiaries of the results of the project, especially those that received ToT capacity building activities. They indicated that they are committed to continue enhancing their capacities and national frameworks to increase the detection, analysis, and tracking of money laundering crimes, especially related to TIP/SOM crimes. According to one beneficiary, "the project provided us with the platform and tools to enhance our knowledge and experience in countering money laundering of TIP/SOM proceed". ToT beneficiaries indicated that they would like to utilize the knowledge gained to build capacities in their home countries as well as in the region. While the project had planned to utilize these beneficiaries in subsequent project activities, this could not be done in the timeline of this project mainly due to the delay that occurred on holding the ToT sessions because of the COVID crisis.

Furthermore, the participation of senior-level staff in the project's activities, and the enhanced cooperation resulting from the project, give an indication of the commitment of stakeholders and beneficiaries to the project's results. Government recipients and stakeholders expressed their desire to further deepen coordination between regional countries to become more effective in disrupting financial flows stemming from transnational TIP/SOM crimes. The relationships built throughout the project lifecycle will continue after the completion of the project, as indicated by beneficiaries, which adds to the sustainability of results. Nevertheless, almost all stakeholders indicated that they require continued technical support to progress in their fields.

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, gender equality as well as marginalized groups, including people with disabilities?

Finding 14: Human rights considerations were integrated in both the design and implementation of the project which was characterized by non-discrimination, inclusivity and participation.

Human rights considerations were found to be integrated within the design of the project. In specific, the project utilized the 2017 Guidance Note for UNODC Staff on the Promotion and Protection of Human Rights, which maps the types of concerns that pertain to specific interventions. For this project, the concerns include (i) the rights of offenders at different stages of criminal justice proceedings, (ii) the rights of victims at different stages of proceedings, and (iii) the independence of the judiciary and the integrity of law enforcement and criminal justice personnel. This has been clearly outlined in the design of the project.

Human rights were also taken into consideration during the implementation of the project. For example, the content of the final regional workshop of the project paid special attention to human rights in terms of rights holder and duty bearers. In specific, some of the sessions outlined the duties and rights of individuals involved in TIP/SOM crimes, according to the concerns mentioned above.

Moreover, no incidents of human rights violations were reported during the implementation of the project and all stakeholders met with during the field work of this evaluation asserted that all project activities were characterized by non-discrimination, inclusion and participation. In other words, no form of discrimination took place over the course of project implementation and efforts were put to ensure that project activities are inclusive of all groups and encouraged participation of such groups.

It is well known that various human rights violations occur at different stages of the trafficking cycle, and therefore, this project aims to directly support and uphold these basic human rights through its focus on financial investigations of such crimes. In fact, the UNODC Toolkit on Trafficking in Persons emphasizes the importance of financial investigations and analyses to uncover traffickers and smugglers (i.e. follow the money and you will find the trafficker). Ultimately, the project's outcomes are expected to contribute to the detection and prosecution of traffickers and smugglers who abuse human rights.

Finding 15: Considerations of gender equality were included in the project design, but given the predominance of males in the sectors targeted by the project, most beneficiaries and stakeholders were found to be men

A commitment to gender mainstreaming and exercising a gender-sensitive approach was explicitly expressed in the project proposal document. In specific, the project document mentioned how the project will ensure that women participants benefit from training activities and inclusion in any workshops or meetings associated with the project activities. Data would also be collected and disaggregated according to gender. This is in accordance with the Guidance Note on Gender Mainstreaming in the Work of the UNODC which specifically guides UNODC staff to integrate a gender perspective into all aspects of their work and into UNODC programs and activities. During the course of the project, 19.2% of the attendees of the various project activities were female.

The project team indicated that while it tries to maximize the representation of females in the project's various activities through encouraging female participation in the official letters/invitations it sends to stakeholders and in the informal discussions held with high-level staff in stakeholder organizations, this is not possible in most of the project's activities, given that the project cannot oblige recipient governments on who to nominate for the attendance of activities. Moreover, the workers in the sectors targeted by the project are predominantly male, which makes it difficult to attain gender equality in the project's activities. As an example, project activities targeting financial institutions had much more female representations than activities targeting other groups such as law enforcement agencies. According to the project team, "we secure female participation whenever we are able to do so". The project team indicated that they ask for female representation in both official letters and even in informal discussions. Having said that, the evaluation found that most of the speakers and experts recruited for the project's activities were male, and more may have been done to involve more female representation from the side of speakers and experts, which is ultimately under the control of the project, as this encourages a higher rate of female representation on the part of beneficiaries.

Finding 16: The project was found to uphold the promise of 'leaving no one behind' across its projects activities, especially with respect to activities held in Sudan, but the issue of disability inclusion was not mainstreamed in project design and activities.

The project was found to uphold the promise of leaving no one behind with regard to marginalized groups affected by TIP/SOM crimes. The project's sessions tackled varied TIP/SOM crimes that involved different vulnerable groups including sex trafficking victims, forced labour victims, and even organ trafficking victims among other vulnerable groups. To as much as possible, the project was comprehensive in addressing a wide variety of vulnerable groups affected by TIP/SOM crimes. Having said that, there was no mention of disability inclusion in the design of the project nor during implementation.

Moreover, and as mentioned earlier, Sudan was dropped from the project in its first year at the donor's request and was subsequently replaced with Algeria for the remainder of the project. But the UNODC did not fully halt all its activities in Sudan, but rather, it continued providing technical support through another project and through UNODC's own funds. This embodies the principle of 'leaving no one behind' in terms of preserving

the rights of Sudanese practitioners to benefit from capacity building activities, which would in turn enhance their ability to combat TIP/SOM crimes that violate human rights of vulnerable individuals in the country.

III. CONCLUSIONS

The project's strong relevance to the needs and priorities of recipient governments and beneficiaries, and its coherence with other UNODC interventions in the region, was instrumental to gaining the commitment of stakeholders and enhancing the effectiveness of the project in terms of enhancing national capacities in participating countries as well as improving national-level coordination, though stakeholders indicated that they would like to see more regional cooperation activities. The rationale and design of the project was based on findings from a number of studies that highlighted a gap in awareness and knowledge of how proceeds of TIP/SOM crimes are laundered. The project was thus designed to focus on countering the financial proceeds of TIP/SOM crimes, thereby complementing other UNODC efforts in the region that focus on the traditional methodologies of combating these crimes. Therefore, the project was based on identified needs and on actual official requests coming from each of the participating countries. The project was also found to maintain its relevance over the life cycle of the project through responding effectively and swiftly to needs and priorities identified during implementation. This has further raised the commitment of stakeholders to the project and its results, which, coupled with a host of sustainability elements found in the design and implementation of the project, has resulted in sustainable project results.

Having said that, the effectiveness of the project varied between the participating countries, with a higher degree of effectiveness found in Egypt and Morocco than in Algeria. The main factor behind the lower effectiveness of the project in Algeria was that the country was the least exposed to the project's activities out of the three participating countries in addition to the fact that most activities in Algeria were conducted remotely, even though most activities that took place in the country were implemented after the lifting of all COVID restrictions in the country. Algeria's limited exposure to the project was mainly due to it being incorporated late into the project and coincided with the advent of the COVID crisis. In addition to these factors, the modality of working with Algeria carried some difficulties as the project team was communicating with authorities in Algeria via the embassy in Cairo, and not directly. This, coupled with the centralized decision-making system in the country and turnover in relevant Algerian staff, adversely impacted that efficiency and effectiveness of project implementation in the country.

Despite some losses in efficiency resulting from the COVID crisis and from the project's work with Algeria, the project team was able to take specific measures that have helped raise the efficiency of the project following the crisis. This was mainly through utilizing idle time during the crisis to develop technical outputs and training materials, as well as implementing remote activities with recipient governments, taking into consideration the need to ensure a high quality of activities. Nonetheless, duplications, in at least one case, were found among beneficiaries attending the same training sessions which adversely impacted the efficiency of the project.

Through its focus on TIP/SOM crimes, the project worked to protect human rights in the region through countering the financial flows of these crimes. In addition, the project was found to uphold the promise of 'leaving no one behind' with respect to not leaving Sudan alone, at the request of the donor, but rather through continuing some activities in the country and involving it in regional activities, while keeping an eye of reputational risk. Considerations of gender equality were included in the project design but given the predominance of males in the sectors targeted by the project, most beneficiaries and stakeholders were men. While the decision on who to nominate from stakeholder organization to attend the project's activities is outside the hands of the team, more could have been done to involve female experts, trainers, and speakers in the project's activities which may help encourage the participation of women in future activities.

IV. RECOMMENDATIONS

RECOMMENDATION 1 – MANAGEMENT AND IMPLEMENTATION ARRANGEMENTS

It is recommended that the UNODC ROMENA and UNODC FO in Algeria tailor future projects or activities in Algeria to the unique working modality of Algerian authorities, specifically during the design phase. This was not possible in this project, due to the late incorporation of Algeria, but should be part of the design of future projects or activities planned in Algeria. In other words, the unique and centralized working modality in Algeria should be taken into account during the design stage in order to account for challenges and risks arising from such a modality. Moreover, the UNODC should ensure that suitable management, administrative, and implementation arrangements are in place to support the smooth implementation of future UNODC activities in Algeria. This also includes establishing clear lines of communication and implementation modalities with Algerian authorities, which should be implemented over the short term. This will help minimize disruptions to the planning of activities in the country which will in turn minimize the adverse impact that such disruptions have on the project's overall efficiency and effectiveness. Given that the Algerian government lifted all COVID-related restriction by the end of 2021, all future activities are recommended be done face-to-face and not remotely to maximize the effectiveness of project activities.

Based on findings 5 (efficiency), 9 (effectiveness), 11 (effectiveness)

RECOMMENDATION 2 – RELEVANCE AND EFFECTIVENESS

It is recommended that the UNODC ROMENA and the project team advance the technical level of capacity building to become more specialized, such as a focus on virtual assets, and consider a thematic or sectoral capacity building approach, with a focus on practical vs theoretical training. Given that this project built a solid base of technical capacity among practitioners in the region, upcoming activities should become more specialized tailoring trainings to specific sectors (LEAs, Fls. etc) to maintain the relevance of future capacity building activities and respond to beneficiaries' developing needs. In other words, the needed capacity and skills development in the region is now different from when the project began, and therefore, future activities should cater for more advanced technical needs. Moreover, it is recommended to focus on the topic of virtual assets (their seizure, confiscation, and management) and effectively address the legal and institutional challenges and risks associated with their use in the region, especially with regards to cryptocurrencies. This is expected to maintain the strong relevance of UNODC programming in the region, as the need to learn more about virtual asset was raised by most stakeholders and beneficiaries in the region. This would also enhance the relevance of future programming given the significant rise in the use of cryptocurrencies in recent years. To as much as possible, future activities should include more practical cases rather than theoretical material, based on beneficiaries' needs.

Based on findings 2 (Relevance), 8 (Effectiveness)

RECOMMENDATION 3 – COOPERATION AND EFFECTIVENESS

It is recommended that the UNODC ROMENA and the project team expand the scope of future activities to include more regional countries in the project's activities, as well as involve receiving and sending countries in upcoming activities. While the project team had put efforts in including other regional countries in this project, having a larger scope of countries at the design stage allows for more resources for more effective planning for regional activities that better contribute to regional coordination. Moreover, involving sending countries (i.e., Sub Saharan African countries) and receiving countries (i.e. European countries) contributes to a more effective project in terms of enhanced international cooperation, especially since most TIP/SOM crimes in the region begin in African countries and end in European countries, with the North African region being a transit route.

Based on finding 10 (Effectiveness)

RECOMMENDATION 4 – EFFICIENCY

It is recommended for the UNODC ROMENA and the project team that the project team take measures to ensure that no duplication occurs among beneficiaries attending the same workshop on multiple occasions in future activities, through better monitoring and reporting of workshops. A consistent monitoring and reporting plan that sums the workshop's activities, presents the results of post-workshop surveys, and includes a list of attendees (beneficiaries) will help maximize the efficiency of the project through cross-checking beneficiaries and thus minimizing duplications. A consistent monitoring and reporting approach will also contribute to a better evaluability of the project.

Based on finding 7 (Efficiency)

RECOMMENDATION 5 – SUSTAINABILITY

It is recommended for the UNODC ROMENA and UNODC FOs in the region to utilize the beneficiaries of the ToT activities conducted under this project to build the capacities of other practitioners in their countries and in the region in upcoming activities. While such a methodology was intended for this project, project delays postponed ToT activities and the project could not adequately utilize the ToT beneficiaries in the project's activities. Utilizing these professionals in future activities, under the coaching and supervision of UNODC experts, is expected to contribute to the sustainability of results, and raise the effectiveness of capacity building activities.

Based on finding 13 (Sustainability)

RECOMMENDATION 6 – GENDER EQUALITY

It is recommended for the UNODC ROMENA and UNODC FOs to devise a gender equality plan to be integrated within the design of future projects in order to more effectively mainstream gender equality. Given that the sectors targeted by UNODC are largely male-predominant, especially in the MENA region, a gender equality plan, designed from the outset, is deemed needed to help encourage more female representation in project activities. While the UNODC cannot oblige participating countries on who to delegate to attend a project's activities, a gender equality plan may entail a focus on involving more female experts, trainers, and speakers in the project's activities, which is under the control of the project, and which would help encourage the participation of women in future activities. The preparation of the plan should begin with an assessment of the gender equality status quo in order to set appropriate gender targets to be achieved in the project. The plan may also include dedicated activities within the project to advance and promote gender equality and the participation of females in the sectors covered by the project.

Based on finding 15 (Human Rights, Gender Equality, Disability Inclusion, and Leaving No One Behind)

V. LESSONS LEARNED AND GOOD PRACTICES

LESSONS LEARNED

- A key lesson learned from the experience of the project is to carefully assess the feasibility of implementing a project in each of the participating countries, and make sure that administrative and management arrangements are suitable for implementation. This lesson relates to the project's experience in working with Algeria which carried a host of challenges that included a difficulty in arranging for activities due to the centralized decision-making approach followed in Algeria. The main reasons behind these challenges are related to the incorporation of Algeria as a participating country late into the project, based on the donor's request to drop one of the participating countries included in the original design, namely, Sudan. This meant that Algeria was not part of the original project design which translated into a host of challenges stemming from the working modality of Algerian authorities.

GOOD PRACTICES

- The project's efforts to keep providing support to Sudan, despite of the donor's decision to halt operations in the country, is considered a key good practice related to adaptive flexibility of the project. Rather than taking the easy path and dropping all activities in Sudan, the project was able to continue its support to the country, albeit at a smaller scale than intended, through utilizing other funds available at the UNODC and involving Sudan in regional activities, taking into consideration reputational risks.
- The project's unique focus on the financial side of TIP/SOM crimes, the first such project by the UNODC in the region, was applauded by all stakeholders and is considered as a good practice in terms of enhancing the coherence and complementarity of the UNODC portfolio of projects in the region. While other UNODC projects in the region focused on the traditional methods of countering TIP/SOM crimes, the project's focus on financial matters and provided a new avenue to support authorities in combating these crimes. The project is therefore considered to be a high value-added project to the portfolio of UNODC projects in the region.
- The adaptive responsiveness of the project was found to be a good practice in this project in terms of being able to effectively and swiftly respond to arising needs and priorities identified during implementation. The project was able to implement four capacity building sessions on the seizure, confiscation, and management of virtual assets, especially cryptocurrencies, in response to the direct requests made by beneficiaries during the implementation of project, despite not being part of the original design of the project. In addition to these sessions, the project utilized idle funds near the end of the project to arrange for a study tour to the US on the issue of virtual assets.
- The project's response to the COVID crisis is considered to be a good practice in terms of the measures taken to minimize the loss in efficiency resulting from crises. Despite the uncertain operational environment at the time, the project was able to minimize the loss in efficiency through utilizing the idle time during lockdowns to produce technical reports, training materials, and manuals. Moreover, the project adapted its methodology towards remote work in some of the activities after realizing that the crisis will take considerable time to resolve. The project implemented a large share of activities remotely, which helped maintain the momentum of the project and keeping stakeholders engaged. Having said that, the project was careful not to implement remote activities that required face-to-face interactions to be effective (ToT), but rather, opted to postpone such activities until face-to-face meetings were again permitted.

ANNEX I: TERMS OF REFERENCE

Background and Context

Project duration (dd/mm/yyyy-dd/mm/yyyy):	01/01/2019 – 30/09/2022
Location (Country/ies and sub-national focus areas, if relevant):	Algeria, Egypt and Morocco.
Linkages to Country, Regional and Thematic Programmes & UNODC Strategy 2021-2025:	Regional Programme for the Arab States to Prevent and Combat Crime, Terrorism and Health Threats and Strengthen Criminal Justice Systems in Line with International Human Rights Standards (2016-2021). Sub-Programme III: Combating Corruption and Financial Crimes
Linkages to the SDG targets to which the project contributes:	The 2030 Agenda for Sustainable Development adopted in 2015 has put “promoting just, peaceful and inclusive societies (Goal 16)” among its main goals of transforming the world. Cross border illicit trafficking and transnational organized crime related with terrorism are internationally emphasized as global terrorism threats. By reinforcing information collection and analysis capacities to effectively detect and combat money laundering this proposal will be contributing to achieving the post-2015 global agenda (Goal 16.4): “significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime” and (Goal 16.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”.
Executing Agency (UNODC office/section/unit):	United Nations Office on Drugs and Crime (UNODC), Regional Office Middle East & North Africa (ROMENA)
Partner Organizations:	N/A
Donor(s):	Kingdom of the Netherlands
End Beneficiaries/Recipients:	Financial Intelligence Units (FIU), law enforcement authorities and financial and non-financial institutions.
Total Approved Budget (USD):	\$2,312,102
Total Overall Budget (USD):	\$2,312,102
Total Expenditure by date of initiation of evaluation (USD):	\$1,899,105.67
Name and title of Project/Programme Manager(s) and implementing UNODC office(s)/section(s)/unit(s):	Ms. Mona Salem, Regional Programme Coordinator, Anti-Corruption and Anti-Money Laundering. UNODC, Regional Office for the Middle East and North Africa (ROMENA).
Time frame of evaluation: (planned start and end date of the evaluation process)	May – September 2022

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION
CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND
SMUGGLING OF MIGRANTS (XAMW33)

Budget for this evaluation in USD ⁶ :	\$55,000
Number of independent evaluators planned for this evaluation ⁷ :	Two evaluators
Type and year of past evaluations (if any):	N/A

Project overview

The project aims to enhance the capacities of the Financial Intelligence Units (FIUs) in Algeria, Egypt and Morocco to effectively detect and counter money laundering, in particular in relation to proceeds from Trafficking in Persons and Smuggling of Migrants (TIP/SOM) crimes. Within the framework of this project, UNODC providing technical assistance to relevant law enforcement officials and professionals at the respective FIUs to strengthen their capacities to detect, analyse and consequently disrupt illicit financial flows generated from human trafficking and migrant smuggling crimes. This would result in a better understanding on how and to what extent money laundering affects financial institutions (FIs) and money or value transfer services (MVTs) and consequently lead to an increase in the detection and reporting of suspicious transactions. Given the predominantly transnational nature of TIP/SOM crimes as well as money laundering, the project will also enhance regional and international cooperation amongst countries of origin, transit and destination of mixed migration flows. This will lead to increased cooperation between relevant authorities of Algeria, Egypt, and Morocco amongst each other as well as with other countries within the MENA region and beyond, in particular in relation to the aspect of money laundering and TIP and SOM cases. The project's activities were designed to be delivered in-person, virtual and hybrid formats.

The main Beneficiaries of the project are FIUs, law enforcement authorities and financial and non-financial institutions.

The project and its related activities followed a human rights-based approach to programming, integrating the promotion of equality and non-discrimination, ensuring participation and inclusion of disadvantaged groups. Cooperation and coordination with other regional and international organization and donors was essential to ensure efficient and effective implementation. Furthermore, the project ensured that female participants benefit from training activities and inclusion in any workshop and / or meetings associated with project activities through encouraging the equal participation and adequate gender balance in all its activities to the extent possible, e.g., by supporting the empowerment of women in national counterparts and striving for a gender-balance in the participation in trainings and workshops.

The Project's Objective:

Increased detection and reporting of suspicious transactions to disrupt financial flows resulting from TIP/SOM crimes in Algeria, Egypt and Morocco

The Project's Outcomes:

1	Relevant authorities in the participating countries are capacitated to detect, analyse and track (an increased number of) money laundering cases, in particular the ones associated with TIP/SOM.
2	Improved national, regional and international cooperation

⁶ Including fees for evaluation team, travel, printing, editing, translation, interpretation, etc.

⁷ 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.

Purpose AND SCOPE of the Evaluation

<p>Planned utilisation of the evaluation results⁸:</p>	<p>The aim of the project evaluation is to assess the implementation of the project activities and derive recommendations and ensure accountability to the donor (Kingdom of the Netherlands), stakeholder and counterparts (FIUs, law enforcement authorities and financial and non-financial institutions), to support project improvement and decision making.</p> <p>The evaluation will assess the extent to which the objective, outputs and outcomes were met and whether the resources have been wisely utilized. This allows UNODC to identify areas of improvement, best practices and lessons learnt for future projects and potential future interventions in Algeria, Egypt and Morocco in the field of combating money laundering arising from Trafficking in Persons and Smuggling of Migrants.</p> <p>In addition, the final evaluation will assess the sustainability of the materials as provided by the project to the beneficiaries and whether results of the project can be replicated in other UNODC initiatives elsewhere.</p>
<p>Main users of the evaluation results⁹:</p>	<p>Programme management and donor</p>
<p>Unit of analysis (full projects/segment/etc.)</p>	<p>Full project</p>
<p>Time period covered by the evaluation:</p>	<p>January 2019 – September 2022</p>
<p>Geographical coverage of the evaluation:</p>	<p>Algeria, Egypt and Morocco</p>

All findings and recommendations as well as the management response pertain solely to the UNODC project/programme being evaluated and is not in any way targeted to Member States, implementing partners or other entities that took part in this project/programme.

Evaluation criteria

The evaluation will be conducted based on the below selected relevant DAC criteria¹⁰. 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 learned¹¹ and good practices. The evaluation questions will be further refined by the Evaluation Team in the drafting of the Inception Report.

⁸ 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.

⁹ e.g. senior management, programme management, stakeholders, beneficiaries, donors etc.

¹⁰ <https://www.oecd.org/dac/evaluation/dacriteriaforevaluatingdevelopmentassistance.htm>

¹¹ Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.

Criteria	Evaluation question
Relevance ¹² : Is the intervention doing the right thing?	To what extent has the project been relevant to stakeholder's (e.g. governments, Member States, etc.) needs and priorities?
Coherence ¹³ : How well does the intervention fit?	To what extent has the project delivered results in line with organisational, regional and international priorities?
Efficiency ¹⁴ : How well are resources being used?	To what extent has the project delivered outputs in a timely and efficient manner?
Effectiveness: Is the intervention achieving its objectives? ¹⁵	To what extent did the project achieve its intended outcomes and objective?
Sustainability ¹⁶ : Will the benefits last?	To what extent are the benefits of the projects likely to continue after it ends?
Human rights, gender equality, disability inclusion and leaving no one behind ¹⁷ : Has the intervention been inclusive and human rights based?	To what extent has the project design and implementation fully considered human rights, gender equality as well as marginalised groups, including people with disabilities?

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

¹² Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient and donor.

¹³ The compatibility of the intervention with other interventions in the country, sector or institution

¹⁴ The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way.

¹⁵ The extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.

¹⁶ The extent to which the net benefits of the intervention continue or are likely to continue.

¹⁷ 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.

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.

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>

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

Timeframe and Deliverables

Evaluation stage	Start date ¹⁸ (dd/mm/yy)	End date (dd/mm/yy)	Subsumed tasks, roles	Guidance / Process description
Finalisation ToR (2-4 weeks)	21/04/2022	11/05/2022	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.	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)
Recruitment (3-4 weeks)	12/05/2022	2/06/2022	Consult with IES on potential evaluators; PM manages full recruitment process ¹⁹	Review and clearance of evaluators by IES before recruitment can be initiated by PM. Note: please follow the usual process for recruiting international/national consultants.
Inception Report, incl. desk review (2 weeks)	2/06/2022	16/06/2022	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	Includes 1 week review and clearance by IES; IES may participate in the kick-off meeting
Data collection (incl. field missions) (3-4 weeks) ²⁰	17/06/2022	15/07/2022	Field missions; observation; interviews; etc. by evaluators	Coordination of data collection dates and logistics by PM.

¹⁸ Required preparations before the start: completed ToR; 1 week review of ToR by the Core Learning Partners; finalised ToR based upon comments received; clearance by IES; assessment of qualified evaluation team candidates; clearance by IES; recruitment (Vienna HR for international consultants requiring a minimum of 2 weeks; UNDP for national consultants which may take up to several weeks); desk review materials compiled.

¹⁹ Please follow the official recruitment process for international, regional or national consultants at UNODC.

²⁰ 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.

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

Evaluation stage	Start date ¹⁸ (dd/mm/yy)	End date (dd/mm/yy)	Subsumed tasks, roles	Guidance / Process description
Analysis and draft report (3-4 weeks)	17/07/2022	31/07/2022	Data analysis and drafting of report by evaluators	Includes 1 week review by IES, followed by 1 week review by PM
	02/08/2022	16/08/2022	Review by IES; review by PM; revision of draft report by evaluators	
Draft report for CLP comments (1 week)	18/08/2022	27/08/2022	CLPs review and provide comments to IES	CLP comments are compiled and shared by IES with evaluators
Final report, evaluation brief, PowerPoint slides, and External Quality Assessment (1-2 weeks)	29/08/2022	14/09/2022	Revision by evaluators; Evaluation report, 2-page Evaluation Brief and PowerPoint slides are finalised by evaluators based upon feedback by IES and PM; external quality assessment of report; completion of MR and EFP by PM	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 for external quality assessment facilitated by IES
Presentation (1 day)	19/09/2022	19/09/2022	Presentation organised by PM.	Date of presentation of final results to be agreed between PM and evaluators; IES to be invited.

The UNODC Independent Evaluation Section may change the evaluation process, timeline, approach, etc. as necessary at any point throughout the evaluation process.

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION
CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND
SMUGGLING OF MIGRANTS (XAMW33)

Evaluation Team Composition

Role	Number of consultants ²¹ (national/international)	Specific expertise required ²²
Evaluation Expert	1 (international/national consultant)	Evaluation methodology
Substantive Expert	1 (international/national consultant)	Expertise in combating money laundering

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 fulfil 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.

Roles and Responsibilities in the Evaluation Process

Please ensure that the full evaluation process is managed through Unite Evaluations (evaluations.unodc.org)²³. All communication of preliminary, draft or final evaluation results needs to be reviewed and cleared by IES before dissemination

Evaluation stage	Project Manager	IES	Evaluation team
Overall	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.	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.	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.

²¹ Please note that an evaluation team needs to consist of at least 1 independent evaluator – the Evaluation Expert – and ideally one Substantive Expert.

²² 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.

²³ The Unite Evaluations user manual for Project Managers is available [here](#).

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

Evaluation stage	Project Manager	IES	Evaluation team
ToR	Draft, uploading to Unite evaluations and finalising	1 round of comments	
	Identify stakeholders and CLPs	Share ToR with CLPs for comments (1 week)	
	Compile the desk review material	Support the Project Manager in the identification of suitable evaluation team, when possible	
	Identify potential substantive evaluators and experts		
Recruitment	Propose evaluators and experts after consultation with IES	Review & clear proposed evaluation team before recruitment process starts	Submit all required documentation for the selection and recruitment process
	Administrative process and recruitment (in line with organisational rules and regulations for consultants)		
	Finalise the compilation of the desk review material		
Inception Report	Engage with the evaluation team and provide all required information, documents, stakeholder lists, schedule kick-off meeting etc.	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	Participate in kick-off meeting Draft Inception Report in line with UNODC templates and guidelines ²⁴
	Release payment once requested by IES	Clear Final Inception Report before any data collection can start	Provide Final Inception Report
Data collection and analysis	All logistical arrangements for the evaluators (including travel arrangements, set-up of interviews as requested, note verbales, etc.).	Provide guidance on the evaluation process to the evaluation team and/or the project team, as needed.	Conduct an independent, participatory and high-quality data collection.
	Timely travel arrangements, payments of DSAs, etc.		Implement the methods and tools developed in the Inception Report.
	Participate in de-briefings, as necessary		Engage with Project Management to request further information and assistance as required. Conduct de-briefings to PM, as necessary
	Provide further data, documents, stakeholders, etc. as requested by the evaluation team.		Conduct a thorough analysis to ensure triangulation of evidence.

²⁴ <https://www.unodc.org/unodc/en/evaluation/normative-tools.html>

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

Evaluation stage	Project Manager	IES	Evaluation team
Draft report	Provide further information to evaluators as requested		Provide a high-quality draft report, in line with UNODC and UNEG N&S
	1 review of the draft report for factual errors, once cleared by IES	Review of the draft report	Incorporate comments of IES and consider those of PM
	Release payment, once cleared by IES	Initial clearance or rejection of draft report	
		Share draft report with CLPs (1 week)	Incorporate comments of CLPs.
Final report, Brief and Presentation	Complete Management Response and Evaluation Follow-up Plan	Facilitation of external quality assessment of the report.	Based on the external assessment, finalise the report, 2-page Evaluation Brief and PowerPoint slides.
	Review the 2-page Evaluation Brief and PowerPoint slides and organize an MS Teams presentation of the results to internal and external stakeholders	Final review by IES and either 1) clearance for publication or 2) non-clearance for publication if it does not meet UNODC & UNEG norms and standards IES to attend final presentation as necessary	Present the results as agreed with Project Management and as cleared by IES within 4 weeks of approval of the final evaluation report.
	Release all outstanding payments, as requested by IES	Clear all deliverables for payment, once they meet UNEG Norms and Standards and UNODC evaluation policy, templates and guidelines.	
Follow-up	In case the report is not cleared by IES, use it exclusively for internal reporting (NOT for dissemination)		
	Yearly update on the implementation of recommendations.	Report on the implementation of recommendations to Member States and the Executive Director on an annual basis.	

ANNEX II: EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES

SEMI-STRUCTURED INTERVIEW GUIDES BY STAKEHOLDER GROUP

The Independent Evaluation Section of United Nations Office on Drugs and Crime (UNODC) is in the process of conducting a Final Independent Project Evaluation of UNODC's "Strengthening the Financial Investigation Capacity to Combat Money Laundering Arising from Trafficking in Persons and Smuggling of Migrants" 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 implementation of the project activities and derive recommendations and ensure accountability to the donor (Kingdom of the Netherlands), stakeholders and counterparts (FIUs, law enforcement authorities and financial and non-financial institutions), to support project improvement and decision making. The evaluation will assess the extent to which the objective, outputs and outcomes were met and whether the resources have been wisely utilized. This allows UNODC to identify areas of improvement, best practices and lessons learnt for future projects and potential future interventions in Algeria, Egypt and Morocco in the field of combating money laundering arising from Trafficking in Persons and Smuggling of Migrants. In addition, the final evaluation will assess the sustainability of the materials as provided by the project to the beneficiaries and whether results of the project can be replicated in other UNODC initiatives elsewhere.

The evaluation is carried out by a team of external independent evaluators, consisting of an Evaluation Expert (Mr. Rani Khoury) and a Substantive Expert (Mr. Firas Murrar).

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:

1. Background information:

- a. Name of person being interviewed

- b. Job title of person being interviewed

2.

3.

- a. Organization in which the person being interviewed works (Distinguish between HQ and field)

Relevance

4. Is the project outcomes and outputs aligned with the priorities of the donor?
a. How so? What are the priorities of the Donor.
5. What type of needs analysis was done prior to project design and implementation?
a. Do you think the analysis was sufficient given the scope of the project?
b. How and to what extent were the results of the analysis incorporated into the design of the intervention?

6. How were the emerging needs of stakeholders identified during implementation?
 - a. How responsive was the project in addressing these identified needs? Can you provide examples?

Coherence

7. Do you think that the project is in line with UNODC's strategies and frameworks, regionally and internationally?
 - a. How so? Which strategies and frameworks? To what outcomes do they correspond?
8. Do you think the project is in line with the SDGs (SDG 16, goal 16.4, goal 16.1)?
 - a. How so? To which of the SDGs do the project's outcomes contribute?
9. Does the project complement or build on other UNODC interventions in the country and region?
 - a. What are these interventions and how does this project complement these interventions?

Efficiency

10. To what extent do you think the project was efficient in its implementation?
 - a. How did the implementation and management arrangements adopted by the project affect its efficiency?
 - b. What measures were taken to ensure the efficient utilization of the resources?
11. To what extent did the project face delays during implementation
 - a. What was the source of these delays (endogenous vs exogenous factors)?
 - b. How did the project address the delays?
12. How was the project monitored?
 - a. Was the monitoring plan followed consistently throughout the project?
 - b. Did the project amend any of its activities based on monitoring data?

Effectiveness

13. To what extent did the project implement its planned activities?
 - a. If there are some activities that could not be implemented, what were the reasons?
14. To what extent did the project achieve its intended results (i.e., outputs and outcomes)?
 - a. The extent of achievement of each outcome to be investigated as follows:
 - i. To what extent has the project resulted in an increased capacity of relevant authorities in the participating counties in the detection, analysis, and tracking of money laundering cases?
 - ii. To what extent did the project result in an improved level of cooperation on the national, regional, and international levels
15. To what extent was the project able to contribute to increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco?
 - a. What partnerships did the project make to support the contribution to the project's objective?

Sustainability

16. Are stakeholders committed to the project's results and objectives?
 - a. Has the ownership of stakeholders been achieved by the project? How so?
17. Do you think that stakeholders are committed to continue working towards the project's objective after the end of the project?
 - a. What are the indications?
18. What aspects of sustainability were incorporated into the project?
 - a. What are the sustainability features of the project's design?
 - b. What sustainability features were utilized in the implementation of the project?

Human rights, gender equality, disability inclusion, and leaving no one behind

19. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project design?
20. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account during the implementation of the project?
21. What measures were taken to ensure that human rights, including the rights of marginalized groups, and gender equality issues were mainstreamed across the project activities?

Lessons learned and best practices

22. What lessons can be learned from the implementation of the project in order to improve performance, results, and effectiveness for any similar future projects?
23. What best practices emerged in the project that you think can be replicated in other projects?

INTERVIEW QUESTIONS FOR GOVERNMENT REPRESENTATIVES (RECIPIENTS):

1. Background information:
 - a. Name of person being interviewed
 - b. Job title of person being interviewed
2.
3.
 - a. Organization in which the person being interviewed works (Distinguish between HQ and field)

Relevance

4. Do you know if a needs analysis was done prior to project design and implementation?
 - a. Do you think the analysis was sufficient given the scope of the project?
5. Was the project relevant to your needs? How so?
6. How were your needs identified and addressed during implementation?
 - a. How responsive was the project in addressing these identified needs? Can you provide examples?

Coherence

7. Do you think the project is in line with the SDGs (SDG 16, goal 16.4, goal 16.1)?
 - a. How so? To which of the SDGs do the project's outcomes contribute?
8. Are you aware of other UNODC interventions in your country or region?
 - a. Do you think this project complements or builds on these other initiatives? How so?

Efficiency

9. To what extent do you think the project was efficient in its implementation?
 - a. How did the implementation arrangements adopted by the project affect its efficiency?
10. To what extent did the project face delay during implementation
 - a. What was the source of these delays (endogenous vs exogenous factors)?
 - b. How did the project address the delays?
11. How was the project monitored?
 - a. Were you asked to provide feedback on the sessions attended? How?

Effectiveness

- 12. To what extent did the project implement its planned activities?
 - a. If there are some activities that could not be implemented, what were the reasons?
- 13. To what extent did the project achieve its intended results (i.e., outputs and outcomes)?
 - a. The extent of achievement of each outcome to be investigated as follows:
 - i. To what extent has the project resulted in an increased capacity of relevant authorities in the participating counties in the detection, analysis, and tracking of money laundering cases?
 - 1. Can you tell me how the capacity of relevant authorities increases as a result of this project?
 - ii. To what extent did the project result in an improved level of cooperation on the national, regional, and international levels
 - 1. Can you tell me how has the level of cooperation increased as a result of the project?
- 14. To what extent was the project able to contribute to increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco?
 - a. Do you have any data or information that shows an increased detection and reporting of suspicious transactions?

Sustainability

- 15. To what extent do you feel ownership of the project's results and objectives?
 - a. Please describe future plans and actions with this regard.
- 16. Do you think there will be a continued effort towards the project's objective after the end of the project?
 - a. What are the indications?
- 17. What aspects of sustainability were incorporated into the project?

Human rights, gender equality, disability inclusion, and leaving no one behind

- 18. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project?
- 19. What measures were taken to ensure that human rights, including the rights of marginalized groups, and gender equality issues were mainstreamed across the project activities?

INTERVIEW QUESTIONS FOR DONORS:

- 20. Background information:
 - a. Name of person being interviewed
 - b. Job title of person being interviewed
- 21.
- 22.
 - a. Organization in which the person being interviewed works (Distinguish between HQ and field)

Relevance

- 23. What type of needs analysis was done prior to project design and implementation?
 - a. Do you think the analysis was sufficient given the scope of the project?

- b. How and to what extent were the results of the analysis incorporated into the design of the intervention?
24. Is the project outcomes and outputs aligned with your priorities?
- a. How so? What are your priorities and how is the project aligned with them?

Coherence

25. Do you think that the project is in line with UNODC's strategies and frameworks, regionally and internationally?
- a. How so? Which strategies and frameworks? To what outcomes do they correspond?
26. Do you think the project is in line with the SDGs?
- a. How so? To which of the SDGs do the project's outcomes contribute?
27. Are you aware of other UNODC interventions in the participating countries or region?
- a. If yes, do you think this project complements or builds on these other interventions?

Efficiency

28. To what extent do you think the project was efficient in its implementation?
- a. What measures were taken to ensure the efficient utilization of the resources?
29. To what extent did the project face delays during implementation
- a. What was the source of these delays (endogenous vs exogenous factors)?
 - b. How did the project address the delays?
30. How was the project monitored?
- a. Did you receive regular reporting from the project? How?
 - b. Was the reporting consistent throughout the project duration?
 - c. Did the project amend any of its activities based on monitoring data?

Effectiveness

31. To what extent did the project achieve its intended results (i.e., outputs and outcomes)?
- a. The extent of achievement of each outcome to be investigated as follows:
 - i. To what extent has the project resulted in an increased capacity of relevant authorities in the participating countries in the detection, analysis, and tracking of money laundering cases?
 - ii. To what extent did the project result in an improved level of cooperation on the national, regional, and international levels
32. To what extent was the project able to contribute to increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco?
- a. What partnerships did the project make to support the contribution to the project's objective?

Sustainability

33. Are stakeholders committed to the project's results and objectives?
- a. Has the ownership of stakeholders been achieved by the project? How so?
34. Do you think that stakeholders are committed to continue working towards the project's objective after the end of the project?
- a. What are the indications?
35. What aspects of sustainability were incorporated into the project?
- a. What are the sustainability features of the project's design?
 - b. What sustainability features were utilized in the implementation of the project?

Human rights, gender equality, disability inclusion, and leaving no one behind

36. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project design?

- 37. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account during the implementation of the project?
- 38. What measures were taken to ensure that human rights, including the rights of marginalized groups, and gender equality issues were mainstreamed across the project activities?

Lessons learned and best practices

- 39. What lessons can be learned from the implementation of the project in order to improve performance, results, and effectiveness for any similar future projects?
- 40. What best practices emerged in the project that you think can be replicated in other projects?

INTERVIEW QUESTIONS FOR PARTNERS:

41. Background information:

- a. Name of person being interviewed

- b. Job title of person being interviewed

42.

43.

- a. Organization in which the person being interviewed works (Distinguish between HQ and field)

Relevance

- 44. Are you aware of any needs analysis done prior to project design and implementation?
 - a. Do you think the analysis was sufficient given the scope of the project?
- 45. How were the emerging needs of stakeholders identified during implementation?
 - a. How responsive was the project in addressing these identified needs? Can you provide examples?
- 46. Is the project outcomes and outputs aligned with your needs and priorities?
 - a. How so?
- 47. Do you think the project is aligned with the needs and priorities of stakeholders in the participating countries?

Coherence

- 48. Do you think the project is in line with the SDGs?
 - a. How so? To which of the SDGs do the project's outcomes contribute?
- 49. Are you aware of other UNODC interventions in the participating countries or region?
 - a. If yes, do you think this project complements or builds on these other interventions?

Efficiency

- 50. To what extent do you think the project was efficient in its implementation?
 - a. How did the implementation and management arrangements adopted by the project affect its efficiency?
 - b. What measures were taken to ensure the efficient utilization of the resources?
- 51. To what extent did the project face delays during implementation
 - a. What was the source of these delays (endogenous vs exogenous factors)?
 - b. How did the project address the delays?
- 52. How was the project monitored?
 - a. Was the monitoring plan followed consistently throughout the project?
 - b. Did the project amend any of its activities based on monitoring data?
- 53. How efficient was your partnership with UNODC in this project in terms of coordination?

Effectiveness

54. To what extent did the project achieve its intended results (i.e. outputs and outcomes)?
 - a. The extent of achievement of each outcome to be investigated as follows:
 - i. To what extent has the project resulted in an increased capacity of relevant authorities in the participating counties in the detection, analysis, and tracking of money laundering cases?
 - ii. To what extent did the project result in an improved level of cooperation on the national, regional, and international levels?
55. To what extent was the project able to contribute to increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco?
56. How has your partnership with the project helped it contribute to its main objective?

Sustainability

57. To what extent do you think the project's objective and outcomes are sustainable?
58. Are stakeholders committed to the project's results and objectives?
 - a. Has the ownership of stakeholders been achieved by the project? How so?
59. Do you think that stakeholders are committed to continue working towards the project's objective after the end of the project?
 - a. What are the indications?
60. What aspects of sustainability were incorporated into the project?
 - a. What are the sustainability features of the project's design?
 - b. What sustainability features were utilized in the implementation of the project?

Human rights, gender equality, disability inclusion, and leaving no one behind

61. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project design?
62. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account during the implementation of the project?
63. What measures were taken to ensure that human rights, including the rights of marginalized groups, and gender equality issues were mainstreamed across the project activities?

Lessons learned and best practices

64. What lessons can be learned from the implementation of the project in order to improve performance, results, and effectiveness for any similar future projects?
65. What best practices emerged in the project that you think can be replicated in other projects?

INTERVIEW QUESTIONS FOR DIRECT BENEFICIARIES:

1. Background information:
 - a. Name of person being interviewed
 - b. Job title of person being interviewed
2.
 - a. Organization in which the person being interviewed works (Distinguish between HQ and field)

Relevance

3. Was the project relevant to your needs? How so?
4. How were your needs identified and addressed during implementation?

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

- a. How responsive was the project in addressing these identified needs? Can you provide examples?

Coherence

5. Are you aware of other UNODC interventions in your country or region?
 - a. Do you think this project complements or builds on these other initiatives? How so?

Efficiency

6. To what extent did the project face delays during implementation
 - a. What was the source of these delays (endogenous vs exogenous factors)?
 - b. How did the project address the delays?
7. How was the project monitored?
 - a. Were you asked to provide feedback on the sessions attended? How?

Effectiveness

8. To what extent did the project implement its planned activities?
 - a. If there are some activities that could not be implemented, what were the reasons?
9. To what extent did the project achieve its intended results (i.e. outputs and outcomes)?
 - a. The extent of achievement of each outcome to be investigated as follows:
 - i. To what extent has the project resulted in an increased capacity of relevant authorities in the participating counties in the detection, analysis, and tracking of money laundering cases?
 1. Can you tell me how your capacity increased as a result of this project?
 - ii. To what extent did the project result in an improved level of cooperation on the national, regional, and international levels
 1. Can you tell me how has the level of cooperation increased as a result of the project?
10. To what extent was the project able to contribute to increased detection and reporting of suspicious transactions in order to disrupt financial flows resulting from TIP/SOM crimes in Egypt, Algeria, and Morocco?
 - a. Were you able to increase detection and reporting of suspicious transactions in your country along with other stakeholders?
 - b. Do you have any data or information that shows an increased detection and reporting of suspicious transactions?

Sustainability

11. Are you committed to the project's results and objectives?
 - a. Please describe future plans and actions with this regard.
12. Do you think there will be a continued effort towards the project's objective after the end of the project?
 - a. What are the indications?
13. What aspects of sustainability were incorporated into the project?

Human rights, gender equality, disability inclusion, and leaving no one behind

14. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project?
15. What measures were taken to ensure that human rights, including the rights of marginalized groups, and gender equality issues were mainstreamed across the project activities?

FOCUS GROUP GUIDES AND ARRANGEMENTS

Stakeholder group	Number of participants	Facilitator	Note taker	Expected duration and modality
Beneficiaries	40 (divided to 5 or 6 FGDs)	SE (with support and interventions from EE)	EE (with review from SE)	Average duration will be 90 minutes. 4 Focus groups to be conducted in-person during the field trip to Egypt, and the rest will be conducted remotely)

Focus Group Session	
1.	Date and time Date: _____ Time: _____
2.	Number of Participants (Gender, nationality) Gender: <input type="text"/> <input type="text"/> Nationality: <input type="text"/> <input type="text"/> <input type="text"/>
3.	Moderator name
4.	Assistant & Note taker

The moderator will use any of the four types of questions as needed: open-ended, follow-up, probing and prompted questions. In some cases, the moderator will follow a sequence that consists typically of four parts.

1. Starting with main question and listening for its answer
2. then follow up and inquire about the answer
3. And probe to clarify.
4. If necessary, prompt (cue or aide) the probing questions

Guide for the Focus group discussions (including introduction, consent, questions and finalization note):

Introduction

I would like to thank you all for joining us today,

My name is _____, and here with me is _____. We are an independent evaluation team hired by the UNODC to conduct an independent evaluation of the project " Strengthening the Financial Investigative Capacity to Combat Money Laundering Arising from Trafficking in Persons and Smuggling of Migrants". We are here today to discuss your experience in attending the activities of project, and to discuss the benefits and effects of the training you received through this UNODC project. In specific, we are looking to learn more about the degree of satisfaction on the training, the relevance of the training to your work, and the extent to which you are using the skills gained in your profession. Your inputs will help us better understand the impact of the project on your professional lives and investigate any potential issues you had with the project. You are

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION
CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND
SMUGGLING OF MIGRANTS (XAMW33)

kindly requested to provide answers about the topic based on your current experience and personal opinion. Do not worry about giving you opinion with full transparency; all names will be kept anonymous. There are no right or wrong answers and you are free to ask for clarifications if you do not understand the question.

Our discussion will take about 90 minutes. We want this to be a group discussion, so feel free to participate without waiting to be called on. However, we would appreciate it if only one person did talk at a time. Be assured that all of you will have equal opportunity to express your opinions and please be respectful to opposing attitudes/statements expressed by another participant. There is a lot we want to discuss, so at times I may move us along a bit.

Confidentiality and informed consent: Your participation in this focus group is confidential, with all information received being aggregated and anonymized. 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 focus group is voluntary and you may withdraw from it at any moment.

Notes for moderator:	
<ul style="list-style-type: none"> • Make participants feel comfortable in saying what's on their mind. But don't take too much time in the introduction • When probing into specific issues, make sure to obtain some clear examples that support the claims being made. • Try to extract specific skills that the workers gained from the training? • Try to extract specific experiences where gained skills were utilized in the job 	
Topic of Discussion	Question
Introduction (10-15 min)	<ul style="list-style-type: none"> • Outline purpose of the meeting • Participants introduce themselves <ul style="list-style-type: none"> ○ Ask each participant to indicate: <ul style="list-style-type: none"> Their occupation What was the training(s) (topic)? When was the training received? Where was the training received?
Relevance (15 min)	<ul style="list-style-type: none"> • Can you tell me more about the trainings you received? <ul style="list-style-type: none"> ○ <i>Were the training goals and objectives clearly stated before starting the training?</i> • To what extent do you think the training you received is relevant to your needs and profession? <ul style="list-style-type: none"> ○ Do you think it was the best tool to raise your capacity in this topic (financial investigation) or can you think of a better tool? • Did you ever request the project for a specific training or voiced a specific need? <ul style="list-style-type: none"> ○ To what extent was the project responsive to your expressed needs? • Do you have any other comments on the relevance of the training to your priorities and needs?
Efficiency (10min)	<ul style="list-style-type: none"> • Can you tell me more about the training logistics? <ul style="list-style-type: none"> ○ To what extent do you think the training was implemented according to schedule and on time? ○ What was the size of the training group? Was it appropriate? • Were you asked to fill out an assessment questionnaire or form?

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

Notes for moderator:	
Topic of Discussion	Question
	<ul style="list-style-type: none"> • Make participants feel comfortable in saying what's on their mind. But don't take too much time in the introduction • When probing into specific issues, make sure to obtain some clear examples that support the claims being made. • Try to extract specific skills that the workers gained from the training? • Try to extract specific experiences where gained skills were utilized in the job
	<ul style="list-style-type: none"> ○ <i>before the training?</i> ○ <i>After the trainin?</i> <p><i>Do you have any other comments about the training logistics and organization?</i></p>
Effectiveness (20-30 min)	<ul style="list-style-type: none"> • How was the quality of the training content and method of instructing? Did it facilitate the training provision? <ul style="list-style-type: none"> ○ Was the quality of the training content and method of instruction consistent throughout the training? • How engaging would you say the overall training was? <ul style="list-style-type: none"> ○ Was it interactive? ○ Did you do any activities during the training? Please provide examples • How would you rate the overall quality of the training? Why? • To what extent do you think you benefitted from the training in your profession? <ul style="list-style-type: none"> ○ How so? Can you give examples? • To what extent do you think the instructor(s) were qualified and competent to give the training? • What skills did you gain from the training? • Have you applied any of the training received / skills gained in you work? <ul style="list-style-type: none"> ○ Please provide examples • To what extent did your participation in the training allow you to be more effective in detecting and reporting suspicious transactions to disrupt financial flows resulting from TIP/SOM crimes? • To what extent did the trainings help you build connections with other practitioners in your field? <ul style="list-style-type: none"> ○ Were you able to build connections with professionals from other countries? ○ Do you think this would facilitate cooperation in your line of work? • To what extent do you think the project improved the level of professional cooperation in your field? <ul style="list-style-type: none"> ○ Inside your country? ○ With other countries? ○ How? • Any other comment on the effectiveness of the training in building your skills and connections?
Sustainability (10 min)	<ul style="list-style-type: none"> • To what extent do you think that the skills and knowledge learned during the training will continue to benefit you for years to come? <ul style="list-style-type: none"> ○ How so? • Will you continue to work towards the objectives of this project after its end? <ul style="list-style-type: none"> ○ <i>Please describe how</i>

Notes for moderator:	
Topic of Discussion	Question
<ul style="list-style-type: none"> • Make participants feel comfortable in saying what's on their mind. But don't take too much time in the introduction • When probing into specific issues, make sure to obtain some clear examples that support the claims being made. • Try to extract specific skills that the workers gained from the training? • Try to extract specific experiences where gained skills were utilized in the job 	
Human Rights, Gender Equality, and Leaving no one behind (10 minutes)	<ul style="list-style-type: none"> • Did you experience any discriminatory practices or practices that would jeopardize human rights throughout the intervention? <ul style="list-style-type: none"> ○ If yes: were appropriate steps taken to ensure you receive appropriate care? • Do you think that Women were fairly represented among participants? • How do you think that this project advances human rights and gender equality? • Do you think that women were fairly represented among participants?
Lessons learned and best practices	<ul style="list-style-type: none"> • What recommendations for improvement would you suggest to the project / trainings? • Would you recommend the training to other professionals working in the same field as you? <ul style="list-style-type: none"> ○ Why or why not? • If you had the opportunity to go back and be part of the project again, what would you like to see done differently? • Do you have suggestions to improve such trainings in the future?

OVERVIEW OBSERVATION OF WORKSHOPS/EVENTS

Title & date of the event	Objective of the observation	Who will observe it	How will data be collected?
Final Regional Workshop – Sharm El Sheikh September 4 th to September 6 th	<ul style="list-style-type: none"> To obtain an overview of the results of the project directly from stakeholders To observe the responsiveness of the project to needs of target groups To assess the coherence of the project with other UNODC interventions To witness interactions between attendees To assess whether the project resulted in increased detection and reporting of suspicious financial transactions related to TIP/SOM crimes 	EE + SE	Through pen and paper to be later synthesized into concise observation points. A checklist will be utilized for the collection and recording of data.

FINAL INDEPENDENT PROJECT EVALUATION OF STRENGTHENING FINANCIAL INVESTIGATION CAPACITY TO COMBAT MONEY LAUNDERING ARISING FROM TRAFFICKING IN PERSONS AND SMUGGLING OF MIGRANTS (XAMW33)

	<p>To observe the commitment and ownership of stakeholders to the results of the project</p> <p>To observe how human rights, gender equality, and marginalized groups were considered by the project</p>		
--	--	--	--

Observation Checklist	
Item	Description
Participants' behaviour and engagement	Observe participants' behaviour and engagement in workshop activities to gauge the extent to which the activities are relevant to them and their field of work
Participants' knowledge	Observe participants' knowledge displayed during workshop activities to gauge the extent to which the project was able to increase their capacities
Participants' interactions	Observe participants' interactions during workshop activities to gauge the extent of cooperation among participants and between participants and UNODC.
Participants' attitudes	Observe participants' attitudes during workshop activities to gauge their ownership and the extent to which they are committed to continue working towards the project's objectives
Project results	Observe the project's results, which are expected to be presented during the workshop, to gauge the extent to which the project was able to achieve its desired results.
Workshop process	Observe the number of participants and breakdown of sessions to gauge on the extent of incorporating gender equality and human right considerations

ANNEX III: DESK REVIEW LIST

UNODC DOCUMENTS

- Project's Annual Progress Reports: 2019, 2020, 2021
- Project's Financial Reports: 2019, 2020, 2021
- Project's workshop reports
- Evaluation ToR
- Guideline on recognizing suspicious transactions linked to TIP/SOM – Financial Red Flag Indicators – 2019 (in English and Arabic)
- Gender-Responsive Evaluations in the Work of the UNODC (2018)
- List of all attendees to project's activities
- Project document
- Training Materials
- UNODC Evaluation Handbook
- UNODC Evaluation Guidelines, Templates and Policy
- UNODC Organization Charts -ROMENA
- UNODC Gender Guidance for Project Managers and Evaluators
- UNODC Strategy 2021-2025
- UNODC's Strategic Vision for Africa 2030
- UNODC's Regional programme for the Arab States to Prevent and Combat Crime, Terrorism and Health Threats, and to Strengthen Criminal Justice Systems, in line with International Human Rights Standards (2016-2021)
- UNOV/UNODC's Strategy for Gender Equality and Empowerment of Women (2018-2021)
- Research note on "Understanding Illicit Organ Trafficking" 2020
- TIP-SOM Red Flag Indicators Report (in English and Arabic)
- Training Manual: Financial Investigation on Cases of Trafficking in Persons and Smuggling of Migrants (in English & Arabic)
- Use of Adverse Media Monitoring for Content on TIP.COM to Add to Assessment of Impact of Programmes

EXTERNAL DOCUMENTS

- MENAFATF "Anti-money Laundering and Counter-terrorist Financing Measures – The Arab Republic of Egypt Mutual Evaluation Report" May 2021 (in English and Arabic)
- MENAFATF "Coronavirus Pandemic (COVID-19) and Its Impact on AML/CFT Systems in the Middle East and North Africa Region - Update
- MENAFATF "Regional study on 'Money Laundering Resulting from the Human Trafficking and Migrant Smuggling Crimes" Aug 2021 (in English and Arabic)
- MENAFATF Biennial Typologies Report 2020
- US Department of State – Office to Monitor and Combat Trafficking in Persons – 2022 Trafficking in Persons Report
- UN International Organization for Migration (IOM) – Missing Migrants Project data
- UNEG: Integrating Human Rights and Gender Equality in Evaluations
- UNEG Norms and Standards for Evaluation (2016)
- Various Media Sources

ANNEX IV: STAKEHOLDERS CONTACTED DURING THE EVALUATION

Organisation	Number of stakeholders	Type of stakeholder (see note below)	Sex disaggregated data	Country(ies)
FIUs, LEAs, other government agencies, and project partner	30	Beneficiaries, government recipients	Male: 24 Female: 6	Algeria, Egypt, and Morocco
Kingdom of Netherlands	3	Donor	Male: 1 Female: 2	Netherlands, Morocco, Egypt
UNODC FO/ROMENA	5	UNODC	Male: 2 Female: 3	Egypt
UNODC HQ	2	UNODC	Male: 1 Female: 1	Vienna
	Total: 40		Male: 28 Female: 12	
Note: A stakeholder could be a Civil Society Organisation; Project/Programme implementer; Government recipient; Donor; Academia/Research institute; etc.				