
FINAL
INDEPENDENT PROJECT EVALUATION

COMBATTING MONEY
LAUNDERING AND TERRORISM
FINANCING IN THE MEKONG

GLOU40
JUNE 2024



UNODC

United Nations Office on Drugs and Crime

This independent evaluation report was prepared by an independent evaluation team consisting of Rani Khoury, the evaluation expert, and Timothy Bacwa, the 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, June 2024. 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	III
ABBREVIATIONS AND ACRONYMS	IV
MANAGEMENT RESPONSE	V
EXECUTIVE SUMMARY	VII
I. INTRODUCTION	1
BACKGROUND AND CONTEXT	1
EVALUATION METHODOLOGY	ERROR! BOOKMARK NOT DEFINED.
STAKEHOLDER ANALYSIS	2
LIMITATIONS TO THE EVALUATION	3
II. EVALUATION FINDINGS.....	4
RELEVANCE.....	4
COHERENCE.....	5
EFFICIENCY	6
EFFECTIVENESS.....	8
SUSTAINABILITY	12
HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND.....	13
III. CONCLUSIONS.....	14
IV. RECOMMENDATIONS	15
V. LESSONS LEARNED AND GOOD PRACTICES	17
LESSONS LEARNED.....	17
GOOD PRACTICES	17
ANNEX I: TERMS OF REFERENCE.....	18
ANNEX II: EVALUATION MATRIX	28
ANNEX III: EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES	31
SEMI-STRUCTURED INTERVIEW GUIDES BY STAKEHOLDER GROUP	31
ONLINE SURVEY/QUESTIONNAIRE.....	41
ANNEX IV: DESK REVIEW LIST	46
ANNEX V: STAKEHOLDERS CONTACTED DURING THE EVALUATION.....	48

ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Full name/word
ABA-ROLI	American Bar Association - Rule of Law Initiative
AFP	Australian Federal Police
AML	Anti Money Laundering
APG	Asia Pacific Group on money laundering
ARIN-AP	Asset Recovery Interagency Network – Asia Pacific
AUSTRAC	Australian Transactions Reports and Analysis Centre
CFT	Counter Terrorist Financing
CPF	Countering Proliferation Finance
FATF	Financial Action Task Force
FCR	Full Cost Recovery
FIU	Financial Intelligence Unit
GPML	Global Programme on Money Laundering, Proceeds of Crime and the Financing of Terrorism
HQ	Headquarters
ICRG	International Cooperation Review Group
INL	US Bureau of International Narcotics and Law Enforcement Affairs
MER	Mutual Evaluation Report
MLA	Mutual Legal Assistance
NCA	United Kingdom National Crime Agency
NRA	National Risk Assessment
SEAJust	Southeast Asia Justice Network
SECO	State Secretariat for Economic Affairs
SDGs	Sustainable Development Goals
TA	Technical Assistance
UNODC	United Nations Office on Drugs and Crime

MANAGEMENT RESPONSE

Recommendations ¹	Management Response
<p>1. The project should carry out a formal needs assessment and gap analysis within the next two years, utilizing a comprehensive base of information to inform the design of future programming, tailored to each of the member states to allow for a structured planned approach in upcoming TA programs.</p>	Accepted
<p>2. The project should focus on building and maintaining relationships with high-level executives through incorporating specialized AML/CFT activities targeting the top leadership of stakeholders in each of the member states in future programming to facilitate their committed buy-in and participation, in the national and intuitional level AML/CFT framework reform initiatives.</p>	Accepted
<p>3. The project should enhance the sustainability of its future programming by adopting a ToT approach and institutionalizing the foundational training in the respective training academies present across the region.</p>	Accepted
<p>4. There should be concerted effort to build Financial Intelligence Units (FIU) capacity and reporting entities in the private sector to fulfil their AML/CFT compliance obligations, using FATF's risk-based methodology.</p>	Accepted
<p>5. The project should continue to proactively develop and leverage its partnerships that it built up during the current and past project cycles to further enhance the effectiveness, efficiency, and coordination of its delivery in future programming.</p>	Accepted
<p>6. The project should continue enhancing regional and national level coordination through the introduction of bilateral or multilateral activities involving stakeholders from two or more member states of the Mekong region to enhance peer-peer learning. Other initiatives should include specialized mentorship in specialized areas e.g., emerging technologies, case mentorship, supporting the set-up of AML/CTF financial investigation inter-agency taskforces over and above providing periodic trainings for various stakeholders.</p>	Accepted
<p>7. The project should improve the overall Monitoring and Evaluation (M&E) function of future programming, improve documentation of the project's beneficiaries (e.g., maintaining a database of capacity building participants),</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.

<p>and ensure that reporting is consistent and done on the level of outputs and outcomes and impact accordingly, in line with a well-designed log frame.</p>	
<p>8. The project should include specific cross-cutting topics of specific human rights, gender equality, disability inclusion and leave no one behind in the project design and implementation.</p>	<p>Accepted</p>

INTRODUCTION

PROJECT DESCRIPTION AND OBJECTIVES

The United Nations Office on Drugs and Crime (UNODC) Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML), operating from Lao PDR, implemented a \$1.6 million 42-month project "*Combatting Money Laundering and Terrorism Financing in the Mekong*", funded by the Swiss Government, State Secretariat for Economic Affairs (SECO), whose duration was January 2019 to June 2023. The overall objective of the project was to assist member states to prevent and suppress illicit financial flows (IFF) from drugs and crime under three thematic areas, as detailed in the body of the report.

PURPOSE, SCOPE, AND METHODOLOGY OF EVALUATION

The purpose of the Final Independent Project Evaluation was to assess the extent to which the project objective and outcomes were achieved, and to further assess the level of relevance, coherence, efficiency, effectiveness, and sustainability of the project and to assess the extent to which human rights, gender equality, and disability inclusion were considered, during the project's entire life cycle. A mixed 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.

MAIN FINDINGS PER EVALUATION CRITERIA

RELEVANCE

There was no formal needs assessment done to inform the project design, the project log frame was not updated from the previous project cycle and was not tailored to each of the targeted countries. Notwithstanding this, the project was still found to be relevant to the needs and priorities of stakeholders, including recipient governments and the donor, given that the project had gained substantial experience in implementing earlier GPML interventions in the region since 2009.

COHERENCE

The project was found to be part of a coherent effort by the UNODC given its alignment with the strategic programming of UNODC globally and regionally, and as a continuation of earlier interventions in the region. The project built strong partnerships in the implementation of specific interventions, both within UNODC and with external partners which helped to enhance the alignment of the project's delivery with regional and international priorities, especially during the second half of the project's implementation. The project's outputs were also found to be aligned with United Nations (UN) Sustainable Development Goals (SDGs), especially SDG16 on 'promoting just, peaceful, and inclusive societies'.

EFFICIENCY

The project implemented most activities in the first and final year of implementation, separated by a period of intermittent activities in 2020 and 2021, which was a direct result of the pervasive COVID restrictions in the Mekong region, and globally, especially with respect to travel and gathering. A hybrid approach of technical (TA) was adopted, including remote, online trainings and online face-to-face engagements where practicable. The hybrid approach enhanced efficiency in some instances, but also resulted in an uneven pace of implementation and progress in some targeted member states. The project also had significant overhead costs, which exceeded 20% of the cost of delivery. Other practical limitations on the overall efficiency of the project had to do with the long lead time of UNODC procurement processes, obtaining government counterpart approvals, and the ad-hoc approach to project implementation.

EFFECTIVENESS

The project interventions contributed to increasing the knowledge of stakeholders in member states on illicit financial flows, money laundering and the financing of terrorism. The project also effectively contributed to raising the skill level and capability of law enforcement agencies and to enhancing national-level coordination in member states and regional coordination among TA providers. However, there was minimal assistance provided in reforming the Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) legal frameworks. Similarly, little progress was observed in terms of regional cooperation between targeted member states. Overall, the effectiveness of the project varied across its time period and the respective focus countries owing to COVID travel restrictions, the level of institutional engagement with the project, which was largely driven by the respective countries engagement in the Financial Action Taskforce (FATF) Mutual Evaluation and International Cooperation Review Group (ICRG) processes. The ad-hoc manner in which the project was implemented enhanced project flexibility and effectiveness in some instances, but also led to a less than optimal level of implementation in other cases. Whilst case mentorship rendered by the project was minimal, it was found to have been very effective in assisting countries to achieve success in some transnational cash courier and related Money Laundering (ML) cases. However, case mentorship remains challenging in the Mekong region owing to the strict culture of secrecy and confidentiality in managing and implementing state law enforcement measures.

SUSTAINABILITY

The project developed a guides and manuals for stakeholders that enhanced the sustainability of its results, but the project could not utilize the goAML tool as part of its provision of technical assistance, mainly due to internal procurement regulations in Vietnam and other technical issues. The COVID crisis, coupled with the turnover in the mentor position, adversely impacted the Trainer of Trainers (ToT) programme that the project had planned to implement across the three countries, and threatened the sustainability of the project results. While stakeholders were found to be committed to the overall results and objectives of the project, political will on implementation and reform is sometimes lacking at higher political levels and appears to be primarily driven by the respective countries engagement in FATF processes. Overall, a lot of capacity building activities are still required over the medium-long term, before meaningful sustainability can be realized, at both national and institutional levels in each of the focus countries.

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

The evaluation found that that there was no direct focus on or mainstreaming of human rights, gender or inclusion of marginalised groups (including Lesbian, gay, bisexual, and transgender persons (LGBTIQ+) as well as people with disabilities) in the design and implementation of project activities. Having said that, the project team sought to promote female participation in the project's activities which resulted in over 22% female participation in the three years between 2020 and 2022.

MAIN CONCLUSIONS

The project operated within a very difficult context characterized by rigid top-down decision-making structures across the different member states², the COVID crisis and the associated travel restrictions and national COVID mitigation measures (such as lockdowns) that lasted well into 2022, and a turnover in the leadership position of the mentor during the COVID crisis. All these contextual factors had an adverse impact on project implementation and its overall effectiveness. Nevertheless, the project undertook a number of measures to mitigate these adverse effects including focusing on developing partnerships and enhancing coordination at national and regional levels. Ultimately, the project succeeded in raising the level of awareness and knowledge of various stakeholders in the member states, including enhancing the skills of law enforcement agencies, and contributed to enhanced coordination at the national level. While stakeholders

² < <https://www.adb.org/sites/default/files/institutional-document/678631/gms-economic-cooperation-strategic-framework-2030.pdf> >

were found to be generally committed to the objectives and overall results of the project, political will in implementation and reform was sometimes lacking at higher political and institutional levels and was primarily driven by the FATF processes. Nevertheless, the project developed a couple of guides and manuals for stakeholders that could enhance sustainability overtime. However, much TA is still required across the region in the medium to long term before meaningful sustainability can be realized at national and institutional levels.

MAIN RECOMMENDATIONS³

- The project should carry out a formal needs assessment and gap analysis within the next two years, utilizing a comprehensive base of information to inform the design of future programming, tailored to each of the member states to allow for a structured planned approach in upcoming TA programs.
- The project should focus on building and maintaining relationships with high-level executives through incorporating specialized AML/CFT activities targeting the top leadership of stakeholders in each of the member states in future programming to facilitate their committed buy-in and participation, in the national and intuitional level AML/CFT framework reform initiatives.
- The project should enhance the sustainability of its future programming by adopting a ToT approach and institutionalizing the foundational training in the respective training academies present across the region.
- There should be concerted effort to build Financial Intelligence Units (FIU) capacity and reporting entities in the private sector to fulfil their AML/CFT compliance obligations, using FATF’s risk-based methodology.
- The project should continue to proactively develop and leverage its partnerships that it built up during the current and past project cycles to further enhance the effectiveness, efficiency, and coordination of its delivery in future programming.
- The project should continue enhancing regional and national level coordination through the introduction of bilateral or multilateral activities involving stakeholders from two or more member states of the Mekong region to enhance peer-peer learning. Other initiatives should include specialized mentorship in specialized areas e.g., emerging technologies, case mentorship, supporting the set-up of AML/CTF financial investigation inter-agency taskforces over and above providing periodic trainings for various stakeholders.
- The project should improve the overall Monitoring and Evaluation (M&E) function of future programming, improve documentation of the project’s beneficiaries (e.g., maintaining a database of capacity building participants), and ensure that reporting is consistent and done on the level of outputs and outcomes and impact accordingly, in line with a well-designed log frame.
- The project should include specific cross-cutting topics of specific human rights, gender equality, disability inclusion and leave no one behind in the project design and implementation.

MAIN LESSONS LEARNED AND GOOD PRACTICES

Lessons learned:

- Outreach and a proactive approach to expand and develop partnerships can have a significant effect on minimizing adverse impacts from external shocks.
- Focusing on coordination can minimize the scope of duplication and make implementation more effective.
- An inter-agency approach to technical assistance yields a significantly higher contribution to national coordination than single-agency settings.

Good practices:

- Implementing an adequate hand-over whenever there are key changes in project management personnel can go a long way in mitigating any adverse effects that such a turnover could have.

³ 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 and annex 6 of the report.

- The long-term presence of a project manager/mentor in the Mekong region can significantly foster deep and meaningful relationships which enhance effectiveness of project activities overtime.

BACKGROUND AND CONTEXT

OVERALL CONCEPT AND DESIGN

The UNODC GPML operating from Lao PDR implemented a \$1.6 million 42-month project "Combatting Money Laundering and Terrorism Financing in the Mekong", funded by SECO, from January 2019 to June 2023. The project is part of UNODC's larger Global Programme of Money Laundering, Proceeds of Crime, and the Financing of Terrorism (GPML) and was implemented in Cambodia, Lao PDR, Myanmar and Viet Nam and is a continuation of earlier UNODC engagements since 2009. The project was under the management of the GPML Mekong Region AML/CFT mentor with backstopping support from headquarters. The overall objective of the project was to assist member states to prevent and suppress IFF from drugs and crime, to implement UN conventions and internationally accepted standards for AML/CFT, through enhancing awareness and knowledge on AML/CFT (outcome 1), building the capacity of law enforcement and updating the overall AML/CFT legislative framework (outcome 2), and enhancing coordination on the national and regional/international levels (outcome 3). The project objective was also closely aligned with SDG 16, especially goal 16.4 and goal 16.a. The Project counterparts included the FIUs, police, prosecutors, legislators, judges, customs, and various relevant Ministries in each of the focus countries.

CONTEXT, PURPOSE AND SCOPE

As mentioned above, the project was implemented in Cambodia, Lao PDR, Myanmar and Viet Nam. However, due to the ongoing political and security instability in Myanmar that began in early 2021^{Error! Bookmark not defined.}, and low engagement before that due to COVID, there was no real engagement with the country during most of the project period. The purpose of the Final Independent Project Evaluation was to assess the extent in which the project objective and outcomes were achieved, its overall relevance, coherence, efficiency, effectiveness, and sustainability during its entire life cycle from January 2019 until June 2023. Human rights, gender equality, and disability inclusion and principles of leave no one behind considerations were also considered during this evaluation. The evaluation is intended to inform future project designs and ultimately contribute to UNODC organizational learning. The audience for this evaluation includes the donor, senior management at UNODC, project manager/mentor, recipient governments, and other stakeholders.

THE COMPOSITION OF THE EVALUATION TEAM

The evaluation team was composed of two males: Rani Houry, the evaluation expert, and Timothy Bacwa, the substantive expert. Rani is an economist and evaluation professional with over 11 years' experience in conducting evaluations across the MENA region, while Timothy is a financial crimes expert with more than 18 years' experience working on Forensic Accounting, Anti-Corruption, Risk Advisory, Asset Recovery, AML/CFT, audit and related advisory engagements.

EVALUATION METHODOLOGY

In line with the UNODC evaluation standards, United Nations Evaluation Group (UNEG) norms and standards, as well as the Terms of Reference (ToR), a mixed approach of qualitative and quantitative methods were utilized for an inclusive methodology as well as a triangulation of findings which were substantiated using sound data analysis. Overall, the evaluation relied on the results of (i) a comprehensive desk review, (ii) in-depth semi-structured interviews, and (iii) online surveys. Throughout the course of the evaluation, UNEG ethical standards were adhered to, without exception. The list of documentation that was relied on in conducting the desk review is detailed in annex IV of this report. Evaluation tools were developed during the desk review which included a semi-structured interview tool for each stakeholder group as well as an online survey that was translated to three languages used within the Mekong region. Interviews with stakeholders

with presence outside the region was conducted remotely while in-person interviews were done with each of the stakeholders in their respective country.

Qualitative data was used in the evaluation and was collected from various stakeholder groups as detailed below. The evaluation team met with 46 stakeholders, including 25 males and 21 females, following a purposive sampling strategy that allowed for stakeholder engagement across the different countries. Similarly, quantitative data was obtained via an online survey administered to the beneficiaries of the project as illustrated in the stakeholder analysis. A total of 60 complete survey responses were received from project beneficiaries (26.7% female respondents), 41 of which came from stakeholders in Cambodia, 17 from Lao PDR, and 2 from Viet Nam. Furthermore, the field work was undertaken within UNEG norms and standards, especially with regard to respecting the principles of confidentiality and anonymity of responses.

All data analysis was based on triangulation⁴. For this evaluation, triangulation was achieved by (i) combining three main methods of data collection (document review, interviews, survey), (ii) including different stakeholder groups as key informants for this evaluation, and (iii) evaluator triangulation given that the evaluation team consisted of two independent evaluators. To ensure a high-quality evaluation report, the evaluation team employed a self-quality assurance mechanism through which the strength and validity of the evidence was assessed, and an investigation undertaken of possible gaps or shortcomings that need to be addressed. This ensured the reliability of the evaluation findings, as the quality of evidence is considered to be the backbone of a credible evaluation. Anonymity was ensured throughout the reporting.

STAKEHOLDER ANALYSIS

The project's objectives and activities targeted stakeholders from relevant national AML/CFT authorities specialized in combating money laundering, terrorism financing and other related offences and included FIUs, central banks, police, customs, border authorities, intelligence authorities, investigators, prosecutors and judges, as well as AML/CFT accountable entities including financial institutions and Designated Non-Financial Businesses and Professions (DNFBPs). The above groups of individuals are categorized as beneficiaries of the project since they received capacity building and technical assistance related to their specific areas of work and responsibility in the field of AML/CFT. Other stakeholder groups include UNODC, the project donor, partner organizations and recipient governments as illustrated in the adjacent figure. The number of stakeholders consulted, disaggregated by gender has been included in annex V of this report.



⁴ Triangulation generally refers to the use of multiple approaches, methods and sources for data collection and analysis to verify and substantiate data and information.

LIMITATIONS TO THE EVALUATION

Limitations to the evaluation	Mitigation measures
<p>All the project’s activities were completed by the end of 2022, yet the evaluation was implemented in the beginning of 2024. This means that more than one year had passed since the completion of the project and before the beginning of this evaluation.</p>	<p>The evaluation team was always careful to point out the duration of the project under evaluation, and excluded activities conducted outside the scope of the evaluation. In addition, the evaluation team explained to stakeholders interviewed and surveyed that the evaluation is only looking at the period from 2019 to end of 2022 and indicated some of the activities conducted by the project. This ensured that the discussion remained focused on the evaluation scope.</p>
<p>Myanmar could not be fully included in this evaluation given that the project has ceased its engagement with the country since early 2021 and had very limited interactions before that.</p>	<p>The evaluation has therefore focused on the project’s engagement in the other member states targeted by the project, including Cambodia, Lao PDR and Viet Nam, but also addressed some issues related to Myanmar to the extent feasible.</p>
<p>Overrepresentation of men in law enforcement and government positions, since men outnumber women as criminal justice actors and police personnel globally. The voices of women, and other vulnerable groups, may therefore be underrepresented in this evaluation if a random sampling strategy is utilized for the selection of informants and survey respondents.</p>	<p>Across all data collection and sampling involved in this evaluation, the evaluation team made sure to identify female stakeholders and other marginalized groups involved in the intervention, which ensured a representative analysis.</p>
<p>Initially, the evaluation had a very tight timeline of around 9 weeks from kick off to the submission of the final report, which does not allow for the full evaluation process to be completed in an effective manner.</p>	<p>Following discussion with the evaluation team, the project team arranged for a no-cost extension of an additional 3-week period to allow sufficient time for the evaluation team to collect the necessary data, and then conduct the analysis and drafting of the evaluation report.</p>
<p>Obtaining relevant government statistics e.g., on Suspicious Transaction Reports (STRs), Money Laundering/Terrorist Financing (ML/TF) related case management including number of successful prosecutions, Mutual Legal Assistance (MLA) requests, was challenging especially since it was not gathered by the project during and after the project evaluation period.</p>	<p>In addition to the primary data that was collected for this evaluation, a wide array of information bases was utilised to complement whatever information the team could gather from its field work, including authoritative third-party publications e.g., Asia Pacific Group on Money Laundering (APG) and FATF Mutual evaluation reports (MER), Follow up reports (FUR), etc.</p>

II. EVALUATION FINDINGS

RELEVANCE

EVALUATION QUESTIONS:

To what extent has the project been relevant to stakeholders' (e.g., government, member states, etc.) needs and priorities?

Finding 1: While there was no formal needs assessment done to inform the project design, the project was still found to be relevant to the needs and priorities of stakeholders, including recipient governments, mainly substantial experience gained as a result of the project in implementing earlier GPML interventions in the region.

The project design and implementation were largely based on earlier GPML project interventions in the Mekong region dating back to 2009. No formal needs assessment was done in any of the targeted four countries to inform the design process of this project cycle (i.e., 2009-2023). The activities undertaken were based on the extensive knowledge of the mentor, about the respective countries' AML/CFT framework needs from past project cycles, with a focus on MER's deficiencies reported, in an ad-hoc and often reactive manner. Nonetheless, the project objectives and outputs were found to be relevant to the context of the Mekong and most government counterparts that the evaluation team met confirmed that the project was highly relevant to their respective national level AML/CFT priorities.

Finding 2: The project design considered some but not all the results and recommendations stemming from the mid-term evaluation report.

The project took into consideration a number of issues raised in the mid-term evaluation conducted in 2017 and responded effectively to some but not all of the recommendations, e.g., the rotation of the physical location of the mentor from Vietnam to Lao PDR. The project continued to provide technical assistance (TA) with a focus on each country's MER processes, as well as capacity building to enhance financial investigation capacity, all of which enhanced the relevance of the project. On the other hand, a number of issues are yet to be addressed including reporting against the logical framework and the mainstreaming of human rights and gender equality as detailed below.

Finding 3: However, the project log frame was not updated from the previous project cycle (i.e., 2014-2017) and was not tailored to each of the countries. While this ensured project flexibility in responding to needs, it resulted in a loosely structured project.

The evaluation found that the project log-frame was not updated from the previous project cycle and was not tailored to each of the targeted Member States. While this ensured that the programme remained flexible in responding to the needs of the government counterparts and maintaining relationships built with the respective stakeholders, it resulted in loosely structured programming and contributed to a mostly re-active and ad-hoc nature of project delivery, which in many instances also reflected the difficulty of long-term planning with government counterparts in the region. While this approach proved effective in some specific instances, it also led to less-than-optimal implementation in other cases.

Finding 4: The interventions of the project were found to be a very useful tool to build the capacity of beneficiaries, who indicated that the interventions were very relevant to their line of work. Training activities were localized and tailored to the context in which they were implemented.

Up to 53% of beneficiaries who responded to the online survey indicated that they were consulted on the topics of the training or technical assistance beforehand. Similarly, 75% and 85% of the respondents indicated that the trainings provided were *‘very much’* relevant to building their proficiency in tackling ML, TF and PF related cases and in addressing each country’s AML/CFT strategic direction(s), respectively. Activities were also localized and tailored to the different member states including the translation of TA materials into relevant languages, designing of case studies to simulate practical scenarios relevant to each country.

Finding 5: The project was found to be aligned with the priorities of the donor, especially in terms of its focus on working with and building the capacities of law enforcement agencies in the member states.

SECO uses the International Monetary Fund (IMF) thematic trust fund on AML/CTF as the main vehicle of achieving its AML/CFT programme outcomes. However, since the IMF does not work with law enforcement, SECO sought to partner with UNODC in order to leverage on its law enforcement TA proficiency and presence in the Mekong region in order to build the AML/CFT capacity of law enforcement agencies in each of the countries.

COHERENCE

EVALUATION QUESTIONS:

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

Finding 6: The project was found to be part of a coherent effort by the UNODC in the region given its alignment with the strategic programming of UNODC globally and regionally, and as a continuation of earlier interventions in the region.

Given that the Mekong project is part of a larger global programme and adopts the same logical framework, it is considered to be part of a larger coherent effort by UNODC that responds to international priorities in AML/CFT. The project is well aligned with the UNODC global strategies, including the UNODC Strategy (2021-2025), especially with regard to its thematic areas of “Corruption and Economic Crime” and “Terrorism”. On a regional level, the project was also aligned with the Regional Programme for Southeast Asia 2014-2020 and is in line with the current Regional Programme for Southeast Asia and the Pacific 2022-2026. During the project period there were collaborative efforts with other GPML projects including the GPML Countering Proliferation Finance (CPF) programme, on a CPF training for Vietnamese stakeholders. Overall, the project was able to leverage the relationships and trust that had been built during previous project cycles to ensure a coherent approach over time.

Finding 7: The project’s leveraged its relationships with external partners and other UNODC programmes to enhance the alignment of project delivery with regional and international priorities, especially towards the second half of implementation.

The project was able to partner and coordinate with other UNODC programmes and with a significant number of international and regional actors, in the planning and implementing of its activities, especially towards the second half of the project. Internally, the project cooperated with at least three different teams within the ROSEAP to implement a number of initiatives under the project e.g., with the Criminal Justice, Wildlife and Forestry Crime (now Crimes against the Environment) and the Mekong MOU on Counter Narcotics teams. Externally, the project was able to partner and work with a number of actors including the Australian Federal Police (AFP), the APG, the United Kingdom (UK) National Crime Agency (NCA) and the Institute for Legal Support and Technical Assistance (ILSTA) to implement a number of activities.

Finding 8: In some instances, the project’s trainings overlapped with activities of other TA providers creating the potential of duplication of assistance, but the project’s increased coordination efforts have helped minimize the scope of such duplication.

The evaluation found that in some instances training activities of the project overlapped with the activities of other TA providers opening up the potential of duplication of activities. Furthermore, stakeholders were found to take part in activities of more than one UNODC project that had similar scopes, especially given that the nominations of participants are done by the respective government counterparts. In 2024, UNODC initiated periodic meetings with a significant number of donors, embassies and TA providers to enhance collaboration and coordination with other UNODC projects and other actors, which could contribute significantly to mitigating duplication, enhance coordination and enhance a multi-agency approach to TA delivery.

Finding 9: The project’s outcomes and outputs were found to be aligned with the SDGs, especially SDG 16 on ‘promoting just, peaceful, and inclusive societies’.

The project was found to be closely 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'. The project’s alignment with these goals was confirmed by various stakeholders.

EFFICIENCY

EVALUATION QUESTIONS:

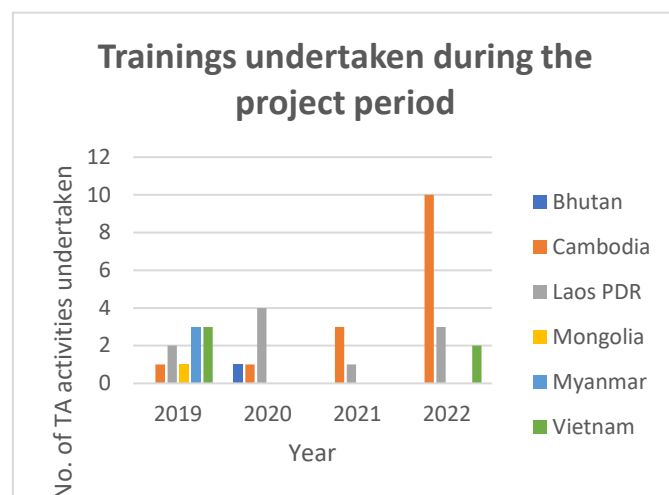
To what extent has the project delivered outputs in a timely and efficient manner?

Finding 10: The project was found to have implemented the largest number of activities in the first and final years of implementation, separated by a period of more intermittent activities in 2020 and 2021 which were a direct result of the COVID restrictions especially with respect to travel and gathering.

The project implemented most of its activities and technical assistance in 2019 and 2022. In 2019, the project implemented 11 activities across all four targeted member states of the Mekong by leveraging on the momentum of previous project cycles. With the onset of the COVID pandemic, there was a slowdown in project delivery. However, the project adapted well by adopting a hybrid TA approach including face-to-face engagements in Laos (6 in 2020) and remote online activities in Laos and other countries (11 in total), mainly due to travel and internal restrictions. In 2022, with the gradual lifting of COVID restrictions, the project implementation gained momentum and implemented a total of 16 activities, many of which were delivered in partnership with other actors.

Finding 11: Despite the project’s flexibility in continuing implementation during the COVID crisis, the hybrid approach to technical assistance came with its shortcomings, including an uneven pace of implementation and progress across the targeted countries.

A total of 35 trainings were undertaken by the project throughout its duration as is shown in the adjacent chart. Approximately 42% of the total number of trainings were delivered in 2022, the year in which COVID restrictions were lifted. Only 4 trainings were undertaken (virtual) in 2021 and 7 trainings in 2020 (face to face) due to COVID related restrictions. No TA was provided by the project from Jan-June 2023 as indicated in background section above. Due to Vietnam’s overall aversion to online training methods, 22 of the 35 trainings were undertaken in Cambodia and Laos, representing 62% of the total trainings undertaken. Only 5 trainings were undertaken in Vietnam,



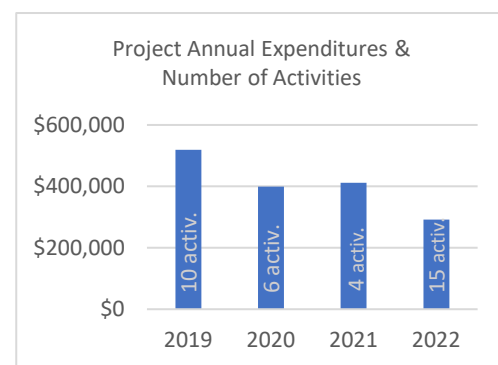
representing only 14% and only 3 were done in Myanmar, representing 9%. The first of the 3 trainings in Vietnam occurred in 2019 and the next one was undertaken in November 2022. This is indicative of a significant time-lapse in implementation. In addition to the impacts of the COVID pandemic, the minimal engagement with Viet Nam and Myanmar during the project period correlate directly/indirectly with their respective MER and ICRG processes (although not necessarily causative) as discussed in the effectiveness section below.

Finding 12: A well-managed handover process between the former and current mentor in 2021 minimized adverse impacts on the efficiency of the project. Nonetheless, the new mentor had to spend significant time to rebuild the relationships with stakeholders and built their trust.

The turnover in the mentor position in April of 2021 was found to have had minimal adverse impact on overall project implementation. This was mostly due to a well-planned handover in which both mentors were engaged with the project for a one-month period for a handover to be undertaken effectively. However, due to travel restrictions, the two mentors were only able to meet in person for one week. As a result, the new mentor had to spend a significant amount of time rebuilding relationships and some key initiatives which were started by the former mentor could not be carried forward by the new mentor.

Finding 13: The project’s focus on partnerships in the delivery of activities, especially in its final year helped to enhance the overall efficiency of delivery.

As cited above, the project implemented the largest number of activities in 2022 (the year in which project expenditures was the lowest, compared to other years) as a direct result of the project’s increased focus on partnerships during this period e.g., with INL, AFP among others. Out of the 35 trainings delivered throughout the duration of the project, 24 or over 68% were financed with partners.



Finding 14: Despite this, the overall efficiency of the project was adversely affected by a high rate of overhead costs, which amounted to over 20% of the cost of delivery.

A relatively high rate of overhead costs exceeding 20% of the total costs of delivery had an adverse effect on the overall efficiency of the project. Whilst the donor applauded the overall efficiency of the activities themselves and the work of the mentors, the high rate of overheads charged at the institutional level contributed to the overall decision to cease further rounds of funding. The evaluation established that the ‘Full Cost Recovery’ (FCR) and ‘Project Support Costs’ (PSC) overhead cost budget lines were charged at 8.4% and 13% respectively. The project attempted to respond to the donor’s concern regarding the high overhead rates by reallocating the budget of HQ backstopping and management from the project to the regional office. Furthermore, the project financial reporting was not fully aligned with the donor requirements, in terms of the level of detail required. According to the UNODC, this was mostly due to challenges of aligning Umoja system outputs to donor’s financial reporting requirements.

Finding 15: Other practical limitations on the overall efficiency and responsiveness of the project had to do with some delays in UNODC procurement processes, obtaining government counterpart approvals, and the ad-hoc approach to implementation.

A number of delays, outside of the COVID pandemic, were encountered by the project which negatively impacted its overall efficiency. For example, the implementation of the goAML system and at least two training events in Viet Nam, a threat vulnerability assessment of the Non-Profit Organization (NPO) sector in Cambodia (a key deficiency as pointed out in the 2017 MER process), development and adoption of investigation manuals in Laos, were among some of the key planned activities which were significantly delayed or not implemented at all during the project period. Other delays that were pointed out by some government counterparts included a lengthy mobilization period before ad hoc requests are implemented, the payment of Daily Subsistence Allowances (DSA) in a post facto manner, as well as organizing most activities towards the end of the year, which often clash with year-end close out obligations of stakeholders.

Finding 16: Project reporting was carried out effectively at an activity level. However, there is little structured reporting done against the project logical framework, i.e., especially with respect to the project outcomes or results as well as impact realized.

The project delivered monthly activity reports throughout the implementation period which effectively captured the progress on the implementation of activities. However, there was no reporting done against the outputs, outcomes and intended impact as laid out in the log frame. In addition, the M&E framework of the project was limited to post-training questionnaires as well as this final project evaluation. Furthermore, the project’s reporting on participants’ feedback was inconsistent over the duration of the project. For example, the project’s annual reports for 2019 and 2020 contain a synthesis of feedback provided by beneficiaries following trainings and other activities. However, no such feedback could be found in the annual reports for 2021 and 2022. In addition, the project does not have a central database of all the project’s beneficiaries, including beneficiaries’ names and contact details. The disaggregation of beneficiaries according to gender was only reported in the 2021 and 2022 annual reports.

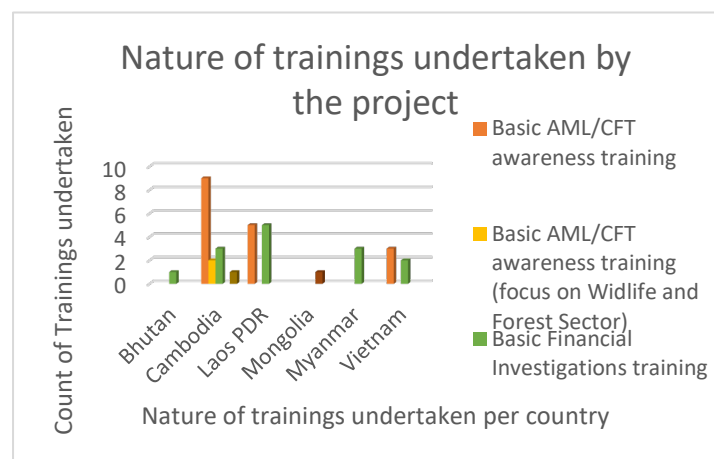
EFFECTIVENESS

EVALUATION QUESTIONS:

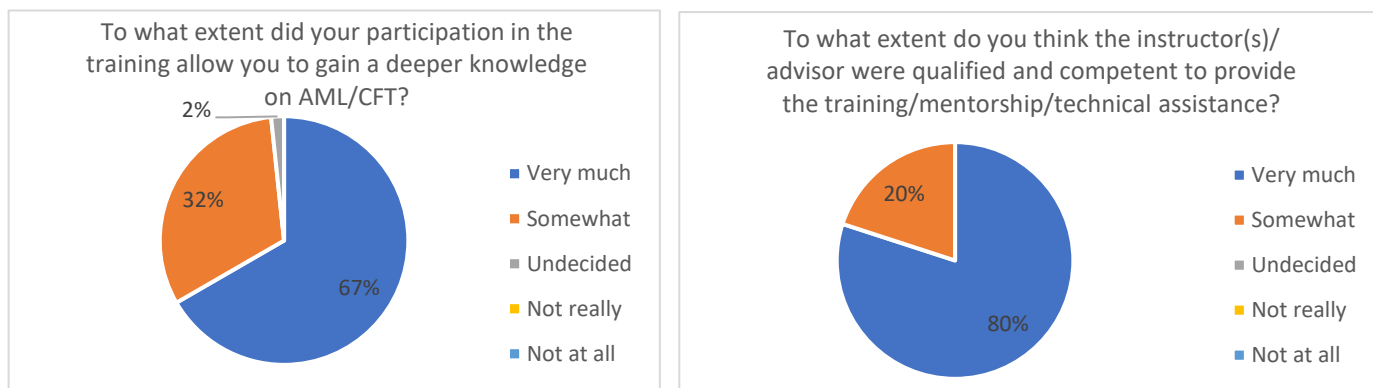
To what extent did the project achieve its intended outcomes and objective?

Finding 17: The project was found to have helped to increase the knowledge of stakeholders in member states on illicit financial flows, money laundering and the financing of terrorism, given the project’s focus on basic trainings. The quality of the project’s technical assistance was especially praised. However, feedback focused on requesting for more in-depth trainings.

The evaluation found that the project was helpful in increasing the knowledge of inter-agency stakeholders in all targeted Member States on AML/CFT issues. This was confirmed by stakeholders that the evaluation team met in each of the countries. Gratitude was expressed for UNODC’s effort and expertise in disseminating important knowledge on AML/CFT to all concerned stakeholders. According to some FIUs, *“the project made our lives easier since other relevant [law enforcement] agencies now have knowledge on the matter and are more aware of their role in the whole process [AML/CFT compliance]”*. It was found that most of the TA provided to stakeholder across the Mekong consisted of basic and foundational trainings on AML/CFT awareness training and financial investigation training. As the adjacent chart illustrates, most of the trainings carried out by the project consisted of basic AML/CFT awareness, financial investigations, and asset recovery fundamentals. This contributed to raising the knowledge of practitioners across the different stakeholders in the targeted member states. However, there was limited focus on specialized or advanced trainings.



All survey respondents indicated that the instructors/mentor was qualified and competent to provide the training or technical assistance, and that the quality of training was consistent throughout the training(s). Over 93% indicated that the training was engaging. Respondents provided an average rating of 8.1 out of 10 in terms of the quality of the training and technical assistance provided throughout the project.



Most beneficiaries requested for more basic trainings to be provided periodically by the project; in addition, there was a call for more in-depth and specialized trainings e.g., on ML/TF typologies using emerging technologies, for the more experienced practitioners.

Finding 18: The project contributed to raising law enforcement skills to prevent and combat illicit financial flows in accordance with international standards. However, there was limited TA provided, targeting the AML/CFT legal frameworks in the respective Member States, thereby partially contributing to its second outcome.

The evaluation found that the capacity building interventions implemented by the project across the three Member States contributed to building their awareness and skills in various areas of AML/CFT compliance especially law enforcement efforts. For example, some stakeholders in Lao PDR and Viet Nam asserted that the number of ML cases had increased significantly over the past few years, in part due to UNODC’s TA. One agency in Viet Nam reported that ML cases had increased from 1 case in 2019 to over 50 cases in 2024. Similarly, a Lao PDR government agency asserted that there has been a significant increase in the number of ML related cases from 15 in 2015 to over 30 to-date. The agency also confirmed that prior to 2015, no parallel financial investigations were conducted over and above prosecuting predicate offences. Furthermore, up to three of the cases were as a result of direct financial intelligence related efforts rather than being secondary charges, of relevant predicate offences. In addition, some stakeholders asserted that the UNODC website and related tools and resources are currently being used to monitor ML/CFT trends. Other institutional support from UNODC, related to human trafficking, inspection of containers, drug detection, terrorism, wildlife trafficking, including inter-agency trainings, all of which broadened and deepened the knowledge of law enforcement agencies about ML/TF typologies.

However, there was limited evidence that the project contributed directly to updating the AML/CFT legal frameworks in any of the targeted countries. While the evaluation found that a new AML/CFT law was ratified in Cambodia in 2020 and another one in Viet Nam in 2022, no direct evidence of the project’s contribution in directly reviewing or providing TA in drafting or updating the laws was found. However, the evaluation noted that the project (alongside other TA providers in Lao PDR) provided some assistance to the Ministry of Finance and the Lao Customs Department to review, finalize and adopt an English translation of the Customs Law 2020 (Revised).

Finding 19: The project was found to have enhanced national level coordination in the Member States as well as among international organizations and regional bodies on AML/CFT, but little progress was observed in terms of regional cooperation between member states. Nevertheless, inter-agency cooperation was highlighted as a critical need in Lao PDR.

Feedback obtained from government counterparts and beneficiary survey respondents indicated that one of the key benefits of the project was an improved awareness of stakeholder roles in AML/CFT compliance and law enforcement, which in turn played a role in enhancing cooperation and coordination among stakeholders on the national level, especially information sharing in instances where an inter-agency workshop format was used, a more effective contribution to national-level coordination was noted. This was especially true in Viet Nam where stakeholders traditionally work in silos. Representatives from one government entity in Lao PDR asserted that all UNODC project trainings that they participated in were single agency trainings (and were only aware of inter-agency trainings provided by other TA providers). It was hoped that an increase in inter-agency related trainings would foster a much-needed improvement in inter-agency coordination. It must be noted that in Lao PDR, two training events were undertaken by the project as single-entity delivery in nature in Jan-March 2022. Subsequent events that were held in December 2022 were inter-agency in nature.

On the international and regional level, the UNODC, including this project, play a major role in coordinating activities on AML both regionally and in-country. The project contributes regularly to APG's annual meetings, especially in the APG Donor and Providers (DAP) meetings, to reduce any duplication and build on synergies. Furthermore, the project has been contributing to the Asset Recovery Interagency Network – Asia Pacific (ARIN-AP) network in the region which was established during the preceding project cycles. The project highlighted to various stakeholders how the ARIN-AP network could be used to enhance MLA and international asset recovery. The project has also engaged well with the Southeast Asia Network (SEAJust), which was established by the UNODC in 2020. Members of this network are often invited to participate in the project's activities, partly to promote networking among participants. The project also organized study tours for Lao PDR and Viet Nam FIUs in Malaysia in order to assist the countries to prepare for their respective mutual evaluations. These interventions were highlighted as very useful to each of the agencies. Furthermore, many of the training sessions included specific modules on MLA, international conventions, and instruments relevant to AML/CFT, and asset recovery (using relevant case studies) which helped to increase the awareness and knowledge of government stakeholders on the use of international frameworks to enhance international cooperation. Despite the above efforts at enhancing regional cooperation, the evaluation found limited evidence of an improvement in regional coordination among member states as a result of the project's interventions. Many stakeholders acknowledge that there are still significant challenges in sharing information among the focus countries in the Mekong region, especially with/from Viet Nam.

Finding 20: The increase in knowledge and skills on AML/CFT matters as well as increased coordination has assisted member states to mitigate illicit financial flows from drugs and other crime as noted from a number of cases and contributed (directly or indirectly) to Cambodia being removed from FATF's grey list. However, ICRG and MER outcomes in the other member states have not been as successful.

TA provided by the project to Cambodian government officials was found to be relevant and timely and could have in part contributed to the country's removal from the FATF grey list. While there can be no direct attribution made between the project's intervention and Cambodia MER outcomes, there is a significant degree of correlation. The project activities were primarily designed to address the compliance gaps identified in the 2017 MER. This involved training and other TA to Cambodian stakeholders including domestic coordination and cooperation to enhance money laundering investigations, supporting the FIU with financial analysis and dissemination to law enforcement, supporting prosecutions and investigations of money laundering cases, and supporting an increase in the freezing and confiscation of criminal proceeds. These made up 4 items from the 10 items stipulated by the action plan. In addition, the project's provision of technical assistance in 2022 contributed to Cambodia being able to report greater operational output to the ICRG group through its follow up reports, which in turn, enabled Cambodia to better demonstrate progress against its action plan.

The project also provided several targeted cash courier TA to Cambodian Customs and Ministry of Justice (MoJ) including a series of training events on cash couriers, a high-risk focus area for the country. This resulted in successful prosecution of some international cash courier and related money laundering cases. The Cambodia Ministry of Justice and Chief prosecutor, in the Cambodia Prosecution Office, sent official appreciation letters to the project mentor for his contribution in providing technical assistance that led to various prosecutions related to cash smuggling and money laundering cases. Therefore, a combination of factors in Cambodia including the country’s increased political will following its inclusion on the grey list in 2019 and its commitment to addressing the deficiencies in the MER 2017 report, in addition to its active engagement with the project across several online and in-person training workshops, all contributed to securing significant AML/CFT reforms that led to the country’s removal from the grey list, effective February 2023 (see chart-ME ratings overtime)⁵. It is worth noting that the ICRG process focuses on the operationalization of the FATF recommendations, and the project contributed to this by directing its support to IO2 (international cooperation), IO7(ML investigations and prosecutions), and IO8 (asset recovery and confiscation).

Whilst most FIUs indicated that there was an increased awareness on AML/CFT issues, they acknowledged that the number and quality of STRs is still a significant deficiency, mainly due to the lack of willingness or ability from the side of reporting entities in the private sector to submit such reports. Furthermore, FIUs stated that their resources are limited in providing effective oversight and sensitization of reporting entities as well as analysing and disseminating quality and timely financial intelligence to law enforcement agencies, areas which the project did not focus on. Overall AML/CFT technical and operational effectiveness remain relatively low in Viet Nam and Lao PDR due to pervasive deficiencies in

Figure 1: Lao PDR FATF MER Performance

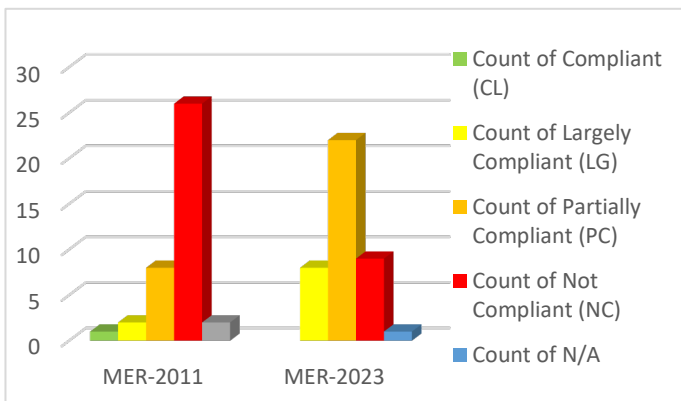
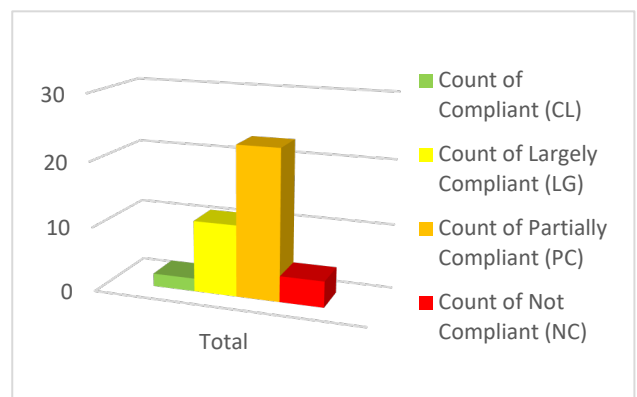


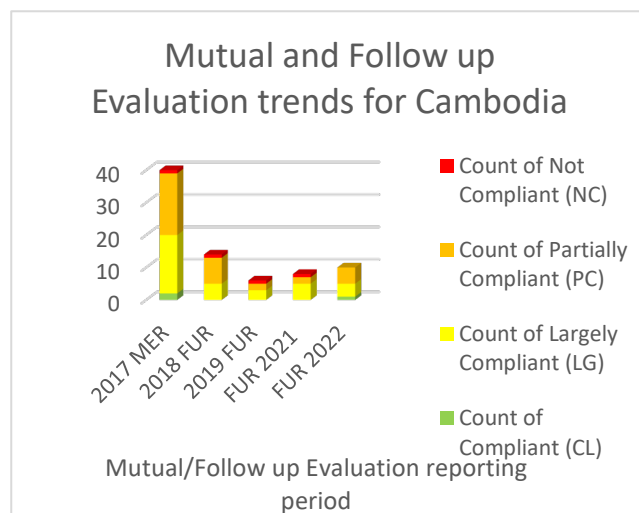
Figure 2: Viet Nam FATF MER Performance (2022)



the application of risk-based methodologies, especially with respect to high-risk sectors, which were not key TA focus areas of the project. The figures below illustrates that whilst Lao PDR and Viet Nam registered some AML/CFT legal and institutional reforms, several significant deficiencies remained, across the entire AML/CFT framework, especially with the application of ML/TF risk-based strategies that could not be sufficiently addressed through periodic ad-hoc training initiatives.

Finding 21: The effectiveness of the project varied across its time period and across the different countries involved. The level of success often depended on the member states engagement with TA providers, which in turn correlated to the whether the country was engaged in the FATF’s ME or ICRG process or not. COVID also played a role.

Mutual and Follow up Evaluation trends for Cambodia



⁵ The chart illustrates Cambodia’s journey to reform its AML/CFT framework using MER and FUR ratings, from 2017 onwards. The project was focused on the ICRG’s operating effectiveness relating to IO2 (international cooperation), IO7 (ML investigations and prosecutions) and IO8 (asset recovery and confiscation)

The evaluation found a strong positive relationship between a country's obligations as stipulated in FATF's ME and ICRG processes and government counterparts' level of engagement with the project. There is a general increase in political will and government counterpart(s) engagement with the project when a country is grey listed or had to prepare for a mutual evaluation. The project effectively capitalized on such obligations to flexibly respond to country specific needs as they arose, as was cited in the Cambodia case (under finding 20 above).

Finding 22: Case mentorship support proved to be successful in building deeper capabilities of government instructions in tackling ML/TF related cases.

The evaluation found that the case mentorship component of the TA was mostly implemented during the 1st part of the project, and was very effective, as outlined in the preceding section with the successful international cash seizures in Cambodia. However, significant challenges remain in obtaining the buy-in of senior leadership in the respective member states, mainly due to strict cultures of secrecy and confidentiality in managing state law enforcement efforts. From April 2021 onwards, with the turnover of the change of mentor, the case mentorship approach was not pursued to the same extent, due to several bottlenecks including COVID restrictions, the need to re-build relationships, before deeper TA interventions could be engaged as well as general risk aversion to uphold the principles of 'do no harm'. Nevertheless, following the increase in TA delivery in Cambodia in 2022, the entor did provide advice and guidance to Cambodian prosecutors on a number of asset recovery cases.

SUSTAINABILITY

EVALUATION QUESTIONS:

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

Finding 23: The project developed a couple of guides and manuals for stakeholders that enhanced the sustainability of its results, but the project could not utilize the goAML tool as part of its provision of technical assistance, due to technical issues and internal procurement regulations in Viet Nam.

One of the project's sustainable elements was its production of tools to guide the work of stakeholders in the Mekong region. One example is the development of a pocket guide for custom officers in Viet Nam and Lao PDR on the prevention, detection and investigation of illicit cross-border transportation of cash. The project also produced a prosecutor's guide on AML for Viet Nam and Lao PDR and a financial investigation manual for Lao PDR stakeholders, including an anti-money laundering operations manual for Lao PDR Customs, all following the localization and adaptation process mentioned above. While the evaluation could not verify the extent to which these tools are being used to-date, they are expected to continue acting as a reference for stakeholders in the field for the foreseeable future. Notwithstanding considerable efforts, the project was unable to facilitate the delivery of the goAML software which had been requested by the FIU in Viet Nam in the 1st quarter of 2019 due to Viet Nam's inability to comply with UNODC Information Technology Section (ITS)'s procurement requirements. Currently, other software options are now being considered. It is worth noting that the project's role in this case was only to facilitate dialogue between UNODC ITS and Viet Nam's AMLD.

Finding 24: The COVID pandemic, coupled with the turnover in the mentor position, adversely impacted the Trainer of Trainers (ToT) programme that the project had planned to implement across the three countries, and threatened the sustainability of the project results.

The project's momentum slowed down significantly during the COVID pandemic, and it took time to regain traction following the turnover in the mentor position of the project. The disruptions prevented the project from implementing the ToT training courses as was initially planned; nevertheless, the new mentor, reacting

to specific requests from the Cambodian authorities to focus TA support in prosecutorial and judicial AML/CFT training, adapting the programme to deliver this focused intervention at the expense of a broader ToT programme. Concerted effort and time were invested by the new mentor to re-build and maintain stakeholder relationships, and to shift away from the previous *'one-mentor'* nature of the project delivery⁶, in order to guarantee sustainability overtime.

Finding 25: While stakeholders were found to be committed to the overall results and objectives of the project, political will on implementation and reform was not always prioritized at higher political levels, and was primarily driven by the FATF ME and ICRG processes. Overall, more interventions are required overtime, before any meaningful sustainability can be built in the Mekong region.

The Mekong context was found to be characterized by a top-down decision-making framework where most activities and initiatives must be approved by the highest executive levels in key institutions Error! Bookmark not defined.. Political commitment at the highest levels was found to be lacking in many instances and was often driven by the respective countries' engagement in FATF's ME and ICRG processes. This means that building relationships with high-level executives in key institutions is a critical determinant of success. Overall, most stakeholders agreed that many capacity building activities are still required over the medium-long term, before meaningful sustainability can be realized, at both national and institutional levels.

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

EVALUATION QUESTIONS:

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

Finding 26: The design of the project and its implementation indicate that there was no direct focus on or mainstreaming of human rights, gender or inclusion of marginalised groups (including LGBTIQ+ and persons with disabilities) in the design and implementation of activities.

The project lacked any direct focus on or mainstreaming of human rights, gender, or inclusion of marginalized groups (including LGBTIQ+ and persons with disabilities). Gender specific thematic areas e.g., identifying future female trainers, research on the roles that women play in ML/TF, and its enforcement were not a focus of the programme. The interventions were limited to encouraging female participation, as well as gathering and reporting gender statistics⁷. The evaluation found that the topic of human rights remains a sensitive and high-risk area in the Mekong region and cannot always be mainstreamed across project activities. In addition, screening potential programme beneficiaries for human rights, TF financial crimes and other violations e.g., using the United Nations Security Council (UNSC) sanctions lists (which is done by a few other TA providers), is yet to be adopted by the project. Despite this, a few government counterparts in Lao PDR and Viet Nam mentioned that human rights issues were highlighted during the various training events of the project. Overall, the project focus was on 'getting the momentum required' before progress on some of these thematic areas could be realized.

⁶ A new AML/CFT programme officer, was recruited to work with the mentor in September 2022 and is based in Lao PDR

⁷ Almost 23% of project participants in the three years period were females, which is considered a good level given the predominance of males in public security and police institutions in the Mekong Region.

III. CONCLUSIONS

The evaluation established that the project was a continuation of earlier GPML interventions, which were implemented directly by a mentor who had been engaged with respective project cycles since 2009. The project log frame was not updated from the previous project cycle (i.e., 2014-2017) and was not tailored to each of the focus countries. No formal needs assessment was done to inform the design of this project cycle which was rather informed by the mentor's knowledge and experience over the preceding decade. Nevertheless, the loosely structured project was found to be flexible and responsive to the needs and priorities of the respective stakeholders identified during implementation.

During the second half of the project, a pattern of strong partnerships with other stakeholders including other UNODC programmes begun to emerge which strengthened a coherent regional approach to project implementation. Furthermore, the strong partnerships greatly enhanced project efficiency due to cost sharing related synergies and to ramp up project implementation after significant disruptions from the COVID pandemic. Furthermore, a well-managed handover process between the former and current mentor in April 2021 mitigated potentially adverse of such a handover halfway through the project implementation period.

The project operated within a very difficult context characterized by rigid top-down decision-making structures across the different member states², the COVID pandemic with its associated travel restrictions and national lockdowns (and other COVID mitigation measures) that lasted well into 2022, and a turnover in the leadership position of the mentor during the COVID crisis. All these contextual factors inevitably had an adverse impact on project implementation and its overall effectiveness.

Despite these challenges, the project managed to implement a significant number of activities and reach a high number of participants across the three member states throughout its duration. The project was found to have contributed to increasing the knowledge of stakeholders in member states on illicit financial flows, AML/CFT, and to improving the capacity of law enforcement stakeholders in handling ML/TF related cases across the three member states. The project also contributed to national-level coordination among stakeholders in each member state, mostly due to its focus on implementing inter-agency workshops, as well as enhancing regional and international coordination among international organizations and regional bodies. Nonetheless, the project was not as effective in enhancing regional cooperation among Member States and was found to have had limited interventions in assisting member states to reform their respective AML/CFT legal and institutional frameworks as outlined in the project log frame.

The effectiveness of the project varied across the respective focus countries and project duration. The level of engagement of the respective counterparts with the project proved to be a key success factor, which in turn largely depended on whether the country was engaged in FATF's ME or ICRG processes or not. For example in Cambodia, a combination of factors including the country's increased political will following its inclusion in the grey list in 2019, and its commitment to addressing the deficiencies in the MER 2017 report, were some of the key drivers of the country's engagement with the project in receiving various different TAs, which in turn contributed to the country's AML/CFT reforms that subsequently led to its removal from the grey list. Another success factor was the local presence of the mentor in the region which was highly praised by partners.

While stakeholders were found to be committed to the overall results and objectives of the project, political will in implementing AML/CFT legal and institutional reform was sometimes lacking at higher political levels and was primarily driven by FATF AND ICRG processes. The COVID pandemic, coupled with the turnover in the mentor position, adversely impacted the ToT programme that the project had planned to implement across the three countries and threatened the sustainability of the project results. Nevertheless, the project developed a couple of guides and manuals for stakeholders that are useful and will assist in ensuring a level of sustainability overtime.

IV. RECOMMENDATIONS⁸

RECOMMENDATION 1 – PLANNING AND TAILORED PROGRAMMING

The GPML Mekong Project Team should undertake a formal needs assessment and gap analysis within the next two years, utilizing a comprehensive base of information to inform the design of future programming which should be tailored to each of the member states according to their respective ICRG processes, ML/TF and PF risk profiles. This will allow for a structured planned approach in designing TA activities. **(3 months)**

Based on findings 1 (Relevance), 3 (Relevance), 15 (Efficiency), and 25 (Sustainability)

RECOMMENDATION 2 – EFFECTIVE RELATIONSHIPS

The GPML Mekong Project Team should focus on building and maintaining relationships with high-level executives through incorporating specialized AML/CFT activities targeting the top leadership of each beneficiary stakeholder groups, in future programming. This may facilitate their buy-in, foster a deeper engagement with the project in a manner that can drive meaningful and sustainable AML/CFT reforms. This includes mitigating the adverse and pervasive effects of a country getting onto the FATF grey and blacklists.

(2 years) *Based on findings 15 (Efficiency), 21 (Effectiveness), 25 (Sustainability)*

RECOMMENDATION 3 – SUSTAINABILITY & CAPACITY BUILDING

The GPML Mekong Project Team should adopt a ToT approach and seek to institutionalize the foundational training in the respective training academies present across the region. This will allow the project to focus on providing specialized/advanced TA including niche topics and emerging trends. **(2 years)** *Based on findings 17 (Effectiveness), 24 (Sustainability)*

RECOMMENDATION 4 – FIUS & THE PRIVATE SECTOR

It is recommended for the GPML Mekong project to focus on case mentoring and building the overall AML/CFT compliance capacity of reporting entities, and FIU's, using FATF's risk-based methodology. This will contribute to raising the capacity of FIUs to enable them to better perform and to building deeper sustainability at an institution level. **(2 years)** *Based on findings 17 (Effectiveness), 24 (Sustainability)*

RECOMMENDATION 4 – PARTNERSHIPS

It is recommended that the GPML Mekong Project Team continues its proactive approach in developing and utilizing partnerships that it began before and during implementation to further enhance the project scalability as well as enhance effectiveness, efficiency and coordination of its delivery in future programming **(On-going, 3 months)**. *Based on findings 8 (Coherence), 14 (Efficiency), 20 (Effectiveness)*

RECOMMENDATION 5 – NATIONAL & REGIONAL COOPERATION

It is recommended that the GPML Mekong Project Team continues undertaking bilateral or multilateral activities involving stakeholders from two or more member states to enhance peer to peer learning. In addition, the project should continue its focus on inter-agency TA formats in its delivery, without exception. Support in establishing AML/CTF financial investigation inter-agency taskforces should be considered in future programming in addition to the continued efforts in promoting regional networks. **(On-going, 3 months.)** *Based on finding 19 (Effectiveness)*

⁸ A more detailed implementation plan in line with each of the recommendations focusing on each of the countries has been included under 'Annexure VI: Implementation guidance for Recommendations.'

RECOMMENDATION 6 – M&E AND REPORTING

It is recommended that the GPML Mekong Project Team enhances the overall M&E function of future programming, improve documentation of project’s beneficiaries, and ensure that reporting is consistent and done on the level of outputs, outcomes, and impact, including gender equality disaggregated information accordingly. **(6 months)** *Based on finding 16 (Efficiency)*

RECOMMENDATION 7 – HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION

It is recommended that the GPML Mekong Project Team includes specific cross-cutting topics related to human rights, gender equality, disability inclusion and leave no one behind in the project design and implementation. **(1 year)** *Based on finding 26 (Human Rights, Gender Equality & Disability Inclusion)*

V. LESSONS LEARNED AND GOOD PRACTICES

LESSONS LEARNED

The project's outreach and proactive approach to expand its partnerships during the second half of the project played a significant role in reducing the adverse impacts that the COVID pandemic and the turnover of the mentor position had on the project. The project managed to partner and coordinate with other UNODC programmes and with a significant number of international and regional actors, in the planning and implementing of its activities, especially towards the second half of the project which contributed to gains in effectiveness, efficiency and sustainability. The project was able to implement the largest number of activities in the last year of the project's implementation, which also corresponded with the lowest project cost. In other words, the project's partnerships enabled it to reach a larger number of beneficiaries than it would have otherwise reached.

Another lesson to be learned from the project's experience is that focusing on coordination can minimize the scope of duplication and make implementation more effective. While there have been instances where TA may have been duplicated, the project focused on coordinating more with other TA providers in multiple occasions and multiple platforms, especially given the project's unique local presence in the region which is considered highly valuable by some partners.

An inter-agency approach to TA is considered to be another lesson learned by the project from its experiences in the different countries. In instances where the project focused on conducting inter-agency activities, a greater contribution to improved national coordination was noted. On the other hand, in instances where the project focused on single-agency sessions, the project's contribution to national coordination was minimal.

Case mentorship has the propensity to assist a country to develop deeper law enforcement capabilities to tackle complex ML/TF related cases. However, such an approach requires buy-in by top leadership teams and must be approached with due care, to mitigate any possible harm.

GOOD PRACTICES

The project's efforts at ensuring that there was an overlap between the former and current mentor of the project helped the project avert major risks to its sustainability and efficiency. The well-managed handover process, even in light of the COVID pandemic, greatly minimized the adverse impacts on sustainability and efficiency, and can be used as a model for other UNODC projects in which there is a planned change in the leadership position. Another good practice identified by the evaluation is the long-term presence of the former mentor, which helped to foster strong relationships with the various stakeholders in each of the member countries. Gaining stakeholders' trust and building effective relationships in a context such as the Mekong is very challenging and requires concerted effort and time. The presence of the mentor in the region for over a decade was pivotal in enhancing the projects effectiveness overtime.

Many Partners and other UNODC programmes highly regard the local presence of the mentor in the region to be an asset not enjoyed by most other TA actors. This was one of the project's strengths that fostered a strong network of partnerships with international and regional and national level actors alike. In-country project mentors are considered subject matters professionals, with extensive subject matter experience. The UNODC is also able to tap into existing network of experts across the word, related UNODC programme staff and tools, and deep subject matter consultants, to address specific high-risk areas. The programme also benefits from synergies with other UNODC programmes that work on high-risk predicate offences to ML/TF or PF including human and drug trafficking and corruption. As such, the programme has proved useful for several partners as a great source of in-country and regional information on ML/TF crime trends.

DRAFT

INDEPENDENT PROJECT EVALUATION
TERMS OF REFERENCE

FINAL INDEPENDENT PROJECT
EVALUATION

OF

COMBATTING MONEY
LAUNDERING AND TERROISM
FINANCING IN THE MEKONG
PROJECT

PROGRAMME NUMBER GLOU40



UNITED NATIONS

Vienna, 2023

I. BACKGROUND AND CONTEXT

Project duration (dd/mm/yyyy-dd/mm/yyyy):	01/01/2019-30/06/2023 (NCE to 31/03/2024 for independent evaluation)
Location (Country/ies and sub-national focus areas, if relevant):	Cambodia, Lao PDR, Myanmar and Viet Nam
Linkages to Country, Regional and Thematic Programmes & UNODC Strategy 2021-2025:	Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML)
Linkages to the SDG targets to which the project contributes:	SDGs: 4, 5, 8, 16 and 17
Executing Agency (UNODC office/section/unit):	UNODC CMLS GPML
Partner Organizations:	None
Donor(s):	Swiss Government, State Secretariat for Economic Affairs (SECO)
End Beneficiaries/Recipients:	Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) authorities of the aforementioned countries
Total Approved Budget (CHF):	1,600,000.00
Total Overall Budget (USD):	\$1,659,567.37
Total Expenditure by date of initiation of evaluation (USD):	\$ 1,630,205.08
Name and title of Project/Programme Manager(s) and implementing UNODC office(s)/section(s)/unit(s):	Mr David Frend, GPML Mekong Region AML/CFT Adviser, UNODC Programme Office Lao PDR
Time frame of evaluation: (planned start and end date of the evaluation process)	28 August 2023 to 23 January 2024
Budget for this evaluation in USD ⁹ :	US\$ 50,000
Number of independent evaluators planned for this evaluation ¹⁰ :	2
Type and year of past evaluations (if any):	End of Phase I Evaluation Report, 2017

II. PROJECT OVERVIEW

The project was designed to be implemented over a period of three and a half years (42 months) in the beneficiary countries of the Mekong but was extended for an extra year because of the impact of COVID 19. The mentors worked closely with the national AML/CFT authorities (AML/CFT national coordination committees, financial intelligence units, ministries of justice, ministries of

⁹ Including fees for evaluation team, travel, printing, editing, translation, interpretation, etc.

¹⁰ 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.

interior/public security, judiciary, prosecutors and customs) to provide AML/CFT advice, training and technical assistance to build AML/CFT capacity of national agencies and to support the effective implementation of AML/CFT regimes in the beneficiary countries. Specifically, the Law Enforcement Advisers (AML/CFT) provided technical assistance, training and mentoring advice and supported capacity building, in accordance with applicable national laws, in the following areas:

- Implementing national AML/CFT strategies and coordination mechanisms, which set out objectives to manage and coordinate AML/CFT responsibilities in each country;
- Providing financial investigation training and mentoring to build capacity of law enforcement and prosecutorial agencies to successfully investigate and prosecute money laundering and the financing of terrorism;
- Building prosecution capacity within relevant authorities through delivery of mock trials of ‘money laundering and terrorism financing offenders’;
- Developing the financial intelligence unit (FIU) in each country and building capacity of FIU staff to effectively collect and analyse relevant information, and to disseminate financial intelligence to law enforcement agencies and other relevant authorities;
- Freezing, seizing and confiscation of criminal assets, including training and mentoring of personnel responsible for confiscation actions;
- Training and developing border control agencies regarding monitoring of cross-border transportation of cash and bearer negotiable instruments (BNIs), identification of cash couriers and seizure of cash and BNIs, when appropriate;
- Assisting effective implementation of Financial Action Task Force Special Recommendation IX (now Recommendation 32) on cross-border cash declaration / disclosure requirements;
- Enhancing the effective regional and international cooperation in relation to identification, investigation and prosecution of money laundering and financing of terrorism;
- Developing information systems for collection and analysis of relevant statistics on the operation of their AML/CFT system to assist in measuring the effectiveness of the AML/CFT regime;
- Awareness-raising on AML/CFT in government agencies, the legislature, the private sector, and the public at large.

All activities were implemented in line with the UN Human Rights Due Diligence Policy to ensure that all participants and counterparts engaged in UNODC initiatives are clear of any serious violations against human rights. The project supported law enforcement and prosecutorial bodies with the implementation of fair treatment of convicted criminals and criminal justice proceedings. The project adhered to the principles enunciated in the Nelson Mandela Rules, as well as principles and guidance provided in UNODC’s approach to the management of Violent Extremist Prisoners, and the UN Rules for the treatment of women prisoners.

As part of Sustainable Development Goal 5, gender consideration is fundamental to all the areas of UNODC work, and this guarantees that activities are gender sensitive. AML/CFT regulatory, supervisory and law enforcement agencies strengthen the capacity of women in these institutions to promote the role of women across the AML/CFT sector.

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

The Project's Outcomes:

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

1.

III. PURPOSE AND SCOPE OF THE EVALUATION

Planned utilization of the evaluation results ¹¹ :	The evaluation will inform the future development of the project or similar projects (the Mekong Region AML/CFT Project continues under new and alternative funding), it will assess the success and areas for improvement of the project, and related projects, and it will assist with organizational learning.
Main users of the evaluation results ¹² :	Senior management, programme management, stakeholders, beneficiaries, donors.
Unit of analysis (full projects/segment/etc.)	The "Combating Money Laundering and Terrorist Financing in the Mekong" Project is a project segment within the broader GPML GLOU40 AML/CFT Programme.
Time period covered by the evaluation:	January 2019 to November 2023 (end of data collection)
Geographical coverage of the evaluation:	The Sub-Mekong Region consisting of: Cambodia, Lao PDR, Myanmar and Viet Nam.

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.

IV. EVALUATION CRITERIA

The evaluation will be conducted based on the below selected relevant DAC criteria¹³. 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 learned¹⁴ and good

¹¹ 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.

¹² e.g., senior management, programme management, stakeholders, beneficiaries, donors etc.

¹³ <https://www.oecd.org/dac/evaluation/dacriteriaforevaluatingdevelopmentassistance.htm>

¹⁴ Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.

practices. The evaluation questions will be further refined by the Evaluation Team in the drafting of the Inception Report.

Criteria	Evaluation question
Relevance ¹⁵ : 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 ¹⁶ : How well does the intervention fit?	To what extent has the project delivered results in line with organizational, regional, and international priorities?
Efficiency ¹⁷ : 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? ¹⁸	To what extent did the project achieve its intended outcomes and objective?
Sustainability ¹⁹ : 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 ²⁰ : 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 marginalized groups, including LGBTIQ+ and persons with disabilities?

2. V. EVALUATION METHODOLOGY

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

The methods used to collect and analyse data.

While the evaluation team shall fine-tune the methodology for the evaluation in an Inception Report, a **mixed-methods approach of qualitative and quantitative methods** is mandatory due to its appropriateness to ensure that evaluation conclusions, findings, recommendations, and lessons learned are substantiated by evidence and based on sound data analysis and triangulation; as well as a gender-sensitive, inclusive, respectful and participatory approach and methodology to capture disability and gender equality issues. Special attention will be paid to: (i) ensuring that voices and opinions of both men, women, and other marginalized groups, such as persons with disabilities are heard (including gender related and disaggregated data, (e.g., by age, sex,

¹⁵ Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient, and donor.

¹⁶ The compatibility of the intervention with other interventions in the country, sector, or institution

¹⁷ The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way.

¹⁸ The extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.

¹⁹ The extent to which the net benefits of the intervention continue or are likely to continue.

²⁰ 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.

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 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>

VI. TIME FRAME AND DELIVERABLES

Evaluation stage	Start date ²¹ (dd/mm/yy)	End date (dd/mm/yy)	Subsumed tasks, roles	Guidance / Process description
Finalisation ToR (2-4 weeks)	28/08/23	04/09/23	Initiate the evaluation in Unite Evaluation and upload ToRs; finalize draft ToR based on IES feedback; IES shares final draft with CLPs; PM to finalize 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)	05/09/23	28/09/23	Consult with IES on potential evaluators; PM manages full recruitment process ²²	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)	29/09/23	13/10/23	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

²¹ 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.

²² Please follow the official recruitment process for international, regional, or national consultants at UNODC.

Evaluation stage	Start date ²¹ (dd/mm/yy)	End date (dd/mm/yy)	Subsumed tasks, roles	Guidance / Process description
Data collection (incl. field missions) (3-4 weeks) ²³	14/10/23	12/11/23	Field missions; observation; interviews; etc. by evaluators	Coordination of data collection dates and logistics by PM.
Analysis and draft report (3-4 weeks)	13/11/23	15/12/23	Data analysis and drafting of report by evaluators	Includes 1 week review by IES, followed by 1 week review by PM
	16/12/23	22/12/23	Review by IES; review by PM; revision of draft report by evaluators	
Draft report for CLP comments (1 week)	23/12/23	05/01/24	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)	06/01/23	22/01/24	Revision by evaluators; Evaluation report, 2-page Evaluation Brief and PowerPoint slides are finalized 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)	23/01/24	23/01/24	Presentation organized 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.

VII. EVALUATION TEAM COMPOSITION

Role	Number of consultants ²⁴ (national/international)	Specific expertise required ²⁵
Evaluation Expert	1 (international/national consultant)	Evaluation methodology

²³ 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.

²⁴ Please note that an evaluation team needs to consist of at least 1 independent evaluator – the Evaluation Expert – and ideally one Substantive Expert.

²⁵ 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.

Substantive Expert	1 (international/national consultant)	Expertise in anti-money laundering/countering the financing of terrorism (AML/CFT)
---------------------------	---------------------------------------	--

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.

VIII. ROLES AND RESPONSIBILITIES IN THE EVALUATION PROCESS

Please ensure that the full evaluation process is managed through Unite Evaluations (evaluations.unodc.org)²⁶. 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.
ToR	Draft, uploading to Unite evaluations and finalizing	1 round of comments	
	Identify stakeholders and CLPs	Share ToR with CLPs for comments (1 week)	
	Compile the desk review material		
	Identify potential substantive evaluators and experts		

²⁶ The Unite Evaluations user manual for Project Managers is available [here](#).

Evaluation stage	Project Manager	IES	Evaluation team
		Support the Project Manager in the identification of suitable evaluation team, when possible	
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 organizational rules and regulations for consultants)		
	Finalize 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 ²⁷
	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
Draft report	Provide further data, documents, stakeholders, etc. as requested by the evaluation team.		Conduct a thorough analysis to ensure triangulation of evidence.
	Provide further information to evaluators as requested		Provide a high-quality draft report, in line with UNODC and UNEG N&S

²⁷ <https://www.unodc.org/unodc/en/evaluation/normative-tools.html>

Evaluation stage	Project Manager	IES	Evaluation team
	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, finalize 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.		
In case the report is not cleared by IES, use it exclusively for internal reporting (NOT for dissemination)			
Follow-up	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 MATRIX

Evaluation Question ²⁸	Indicators/sub- questions ²⁹	Data collection method(s) and triangulation ³⁰	Sources of information
To what extent has the project been relevant to stakeholder's (e.g., governments, Member States, etc.) needs and priorities?	To what extent was the development of the project based on an adequate analysis of the needs and priorities of stakeholders (Member States, recipient governments, partners)?	Document review Interviews	Project documents; UNODC personnel; recipient governments; partners
	To what extent did the project design consider the results and recommendations stemming from the mid-term evaluation report?	Document review Interviews	Project documents; mid-term evaluation; UNODC personnel
	To what extent was the project responsive to the identified needs of stakeholders during implementation?	Document review Interviews	Project documents; UNODC personnel; recipient governments; partners
	To what extent was the project interventions relevant to the needs and priorities various categories of beneficiaries?	Document review Interviews Survey	Project documents; UNODC personnel; recipient governments; partners; beneficiaries
	To what extent has the project been relevant to the priorities of the donor?	Document review Interviews	Project documents; UNODC personnel, Donor
To what extent has the project delivered results in line with organisational, regional, and international priorities?	To what extent have the project's outputs, outcomes and objectives been in line with UNODC's priorities (i.e., strategies) regionally and internationally?	Document review Interviews	Project documents; UNODC personnel; UNODC Strategy 2021-2025, UNODC Regional Programme for Southeast Asia and the Pacific
	To what extent have the project's outputs, outcomes and objectives been in line with the SDGs?	Document review Interviews	Project Documents; UNODC personnel; donner; SDGs
	To what extent has the project been part of a coherent effort by the UNODC (i.e., building on earlier or ongoing interventions)?	Document review Interviews	Project documents; mid-term evaluation (evaluation of Phase 1); UNODC personnel;

²⁸ Please include all evaluation questions in the evaluation matrix.

²⁹ Please state the sub-questions and indicators that will guide your data collection to respond to the evaluation question.

³⁰ Please state the data collection and triangulation methods that will be used to answer the respective evaluation question and the respective data sources.

			recipient governments; partners;
To what extent has the project delivered outputs in a timely and efficient manner?	To what extent did the project face delays during implementation? and what was the source of delays?	Document review Interviews	Project documents; project progress reports; UNODC Staff; recipient governments; partner;
	How did the project address the delays?	Document review Interviews	Project documents; project progress reports; UNODC personnel; recipient governments; partner; Donor
	What measures were taken during planning and implementation to ensure that resources were efficiently used?	Document review Interviews	Project documents; project progress reports; UNODC Staff; recipient governments; partner; Donor
	How was the project monitored? Was the monitoring plan followed consistently throughout the project?	Document review Interviews Survey	Project documents; project progress reports; workshop reports (i.e. pre-post questionnaire results); UNODC Staff; beneficiaries
To what extent did the project achieve its intended outcomes and objective?	To what extent have Member States improved their knowledge on illicit financial flows, money laundering and the financing of terrorism?	Document review Interviews Survey	All project documents including all outputs and progress reports; workshop reports (i.e., pre-post questionnaire results); external documents; UNODC personnel; recipient states; partners; beneficiaries
	To what extent do Member States have effective and updated AML/CFT legal frameworks, regulatory regimes and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards?	Document review Interviews Survey	All project documents including all outputs and progress reports; workshop reports (i.e., pre-post questionnaire results); external documents; UNODC personnel; recipient states; partners; beneficiaries
	To what extent is there an enhanced national-level coordination and regional / international cooperation among Member States, International Organizations, regional bodies on AML/CFT matters?	Document review Interviews Survey	All project documents including all outputs and progress reports; workshop reports (i.e., pre-post questionnaire results); external documents; UNODC personnel; recipient states; partners; beneficiaries

To what extent are the benefits of the projects likely to continue after it ends?	To what extent has the commitment and ownership by stakeholders, including beneficiaries, of the results, activities, and objectives of the project been achieved?	Document review Interviews Survey	Project documents; project progress reports; UNODC personnel; partners; recipient states; beneficiaries
	Are stakeholders, including beneficiaries, committed to continue working towards these objectives after the end of the project?	Document review Interviews Survey	Project documents; project progress reports; UNODC personnel; partners; recipient states; beneficiaries
	What are the main elements of sustainability in the project?	Document review Interviews	Project documents; project progress reports; UNODC personnel; partners; recipient states;
To what extent has the project design and implementation fully considered human rights, gender equality as well as marginalized groups, including LGBTIQ+ and persons with disabilities?	To what extent did the project design consider human rights, gender equality, and marginalized groups (including LGBTIQ+ and persons with disabilities)?	Document review Interviews Survey	Project documents; project progress reports; UNODC personnel; partners; recipient states; beneficiaries
	To what extent did the implementation of the project design consider human rights, gender equality, and marginalized groups (including LGBTIQ+ and persons with disabilities)?	Document review Interviews Survey	Project documents; project progress reports; UNODC personnel; partners; recipient states; beneficiaries
	What measures were taken to ensure that human rights, gender equality, and marginalized groups (including LGBTIQ+ and persons with disabilities) issues were mainstreamed across project activities?	Document review Interviews Survey	Project documents; project progress reports; UNODC personnel; partners; recipient states; beneficiaries

ANNEX III: 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 project 'Combatting Money Laundering and Terrorism Financing in the Mekong Project' (phase II 2019-2023) which aimed at assisting Member States (Cambodia, Lao PDR, Myanmar, Viet Nam) to prevent and suppress illicit financial flows from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT). The project provided technical assistance, training and mentoring advice and supported capacity building to various stakeholders in Cambodia, Lao PDR, and Viet Nam including government officials, prosecutors, legislators, judges, FIU personnel, and others.

The evaluation is being undertaken in line with UNODC and UNEG norms and standards for evaluation and will inform the future development of UNODC programming and assess the success and areas of improvement of the project, and related projects, thereby contributing to UNODC's organisational learning.

The evaluation of this project is currently being carried out by a team of external independent evaluators, consisting of an Evaluation Expert (Rani Khoury) and a Substantive Expert (Timothy Bacwa).

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:

3. Background information:

a. Name of person being interviewed.

b. Job title of person being interviewed.

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

Relevance

4. Was there any analysis of the needs and priorities of stakeholders during the project design?
5. How did the project design take into account lessons from UNODC's earlier engagement in the region?
 - a. Did the project design or implementation take into account the results, recommendations and lessons learned from the mid-term evaluation?
 - 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?
7. How are the project outcomes and outputs aligned with the priorities of the donor?
 - a. What are the priorities of the Donor.

Coherence

8. 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?
9. Do you think the project is in line with the SDGs, especially SDG 16?
 - a. How so?
10. Does the project complement or build on other past or ongoing UNODC interventions in the country and region?
 - a. What are these interventions and how does this project complement these interventions?

Efficiency

11. 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?
12. 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?
13. 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?
14. Were there any factors in budget and administrative arrangements that have promoted or impeded project delivery?

Effectiveness

15. 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?
16. To what extent did the project achieve its outputs and contributed to its intended outcomes?
 - a. The extent of achievement of each outcome to be investigated as follows:
 - i. To what extent has the project resulted in improved knowledge on illicit financial flows, money laundering and the financing of terrorism?
 1. (Investigation of relevant outputs related to (i) raising awareness and (ii) utilizing GPML tools)
 - ii. To what extent did the project contribute to Member States having effective and updated AML/CFT legal frameworks and necessary law enforcement skills in AML/CFT according to international standards?
 1. (Investigation of relevant outputs related to (i) reviewing and enhancing the AML/CFT legal framework in alignment with international standards, and (ii) training national stakeholders to deal with AMF/CFT)
 - iii. To what extent did the project contribute to enhanced national, regional, and international coordination and cooperation on AML/CFT matters?
 1. (Investigation of relevant outputs related to (i) creation of formal and informal networks among AML/CFT professionals, (ii) provision of technical advice to inter-regional and international stakeholders dealing with AML/CFT, (iii) Enhanced mechanisms and tools by Member States for bilateral and multilateral cooperation, and (iv) creation of informal, regional networks for the confiscation and forfeiture of criminal proceeds.
17. To what extent was the project able to leverage its partnership for the achievement of project results and to avoid duplication of work?
18. What do you think were the main challenges and obstacles in effectively contributing to the project's results?
 - a. How were these challenges and obstacles overcome?

Sustainability

19. Are stakeholders committed to the project's results and objectives?
 - a. Has the ownership of stakeholders been achieved by the project? How so?
20. 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?
21. What aspects of sustainability were incorporated into the project?
 - a. What are the sustainability elements of the project design?
 - b. What sustainability elements were utilized in the implementation of the project?

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

22. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project design?
23. 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?
24. 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

25. What lessons can be learned from the implementation of the project in order to improve the performance, results, and effectiveness for similar future projects?
26. What best practices emerged in the project that you think can be replicated in other projects?
 - a. In other words, what is considered to be the most effective aspect of the mentoring initiative of the project on AML/CFT progress in the Mekong?
27. How do you think could future programming improve its technical support and in what areas?

INTERVIEW QUESTIONS FOR GOVERNMENT REPRESENTATIVES (RECIPIENTS):

1. Background information:
 - a. Name of person being interviewed.
 - b. Job title of person being interviewed.
 - c. Organization in which the person being interviewed works.

Relevance

2. 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?
- 3. Was the project relevant to your needs? How so?
- 4. 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

- 5. Do you think the project is in line with the SDGs, especially SDG 16? How so?
 - a. (Briefly describe the SDGs to interviewee, focusing on SDG6)
- 6. 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

- 7. 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?
- 8. 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?
- 9. How was the project monitored?
 - a. Were you asked to provide feedback on the project? How frequently were you consulted?

Effectiveness

- 10. 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?
- 11. 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 improved knowledge on illicit financial flows, money laundering and the financing of terrorism?
 - 1. Can you tell me how the knowledge of relevant stakeholders, including your institution, on AML/CFT improve as a result of this project? Can you provide examples?
 - 2. Are you aware of any GMPL tools utilized by the project to support you? How effective were these tools?
 - a. Are you using GPML databases or documents, tools for preparing APG (or FATF) relevant papers, reports and studies or national level outputs? How?
 - ii. To what extent did the project contribute to Member States having effective and updated AML/CFT legal frameworks and necessary law enforcement skills in AML/CFT according to international standards?
 - 1. How has the AML/CFT legal framework changed since 2019, especially regarding its alignment to international standards? To what extent was this change a result of the project's technical support and guidance?
 - 2. What about the capacity of relevant stakeholders in the area of AML/CFT? Have capacities improved as a result of capacity building support provided by the programme? Please provide examples.
 - iii. To what extent did the project contribute to enhanced national, regional, and international coordination and cooperation on AML/CFT matters?
 - 1. Are you aware of any formal or informal network among AML/CFT professionals in your country? Did the project support the establishment of these networks? How effective are these networks in improving cooperation and coordination among relevant stakeholders? (examples needed)

2. Did the project provide any useful tools that can help facilitate cooperation with other states?
3. Are you aware of any informal regional networks for the confiscation and forfeiture of criminal proceeds? How has the project supported such networks?
12. In your opinion, what makes GPML's assistance unique? What are GPML's strengths under the GLOU40 project? What do you see as the main added value provided by the GLOU40 project staff and mentors?
13. Did you or your organization participate in the preparing for the FATF or APG Mutual Evaluation process or other related APG meetings (or FATF) in the last three years? To what extent?
 - a. If yes, to what extent do you think the project contributed to this process and its outcomes? How so?
14. Do you think donor technical assistance in the area of AML/CFT is well coordinated to avoid duplication and maximize impact?
15. To what extent do you think the project overall contributed to preventing and suppressing illicit financial flows from drugs and crime in the Mekong according to international standards? How so?
 - a. Do you have any data or information that shows an increased detection and reporting of suspicious transactions?

Sustainability

16. Do you think you will continue working towards the project's results and objectives following its completion?
 - a. Please describe future plans and actions with this regard to AML/CFT? Will you build on the project's results? How?
17. 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?
18. What aspects of sustainability were incorporated into 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?
20. 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?
21. How do you think could future programming improve its technical support and in what areas?

Lessons learned and best practices.

22. What lessons can be learned from the implementation of the project in order to improve the performance, results, and effectiveness for similar future projects?
23. What best practices emerged in the project that you think can be replicated in other projects?
 - a. In other words, what is considered to be the most effective aspect of the mentoring initiative of the project on AML/CFT progress in the Mekong?
24. How do you think could future programming improve its technical support and in what areas?

INTERVIEW QUESTIONS FOR DONORS:

1. Background information:
 - a. Name of person being interviewed.

b. Job title of person being interviewed.

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

Relevance

2. How relevant do you think the project and its objective is to the Mekong region?
3. Are you aware of the midterm evaluation concluded in 2017?
 - a. Do you think the project (2019-2023) took into account lessons learned and recommendations stemming from the mid-term evaluation? How so?
 - b. How and to what extent were the results of the analysis incorporated into the design of the intervention?
4. What are your priorities as a donor? Are the project outcomes and outputs aligned with these priorities? How so?

Coherence

5. Do you think the project is in line with the SDGs (mainly SDG 16)?
6. 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

7. 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?
8. 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?
 - c. How was the non-extension process?
9. 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?
 - d. How you rate the overall reporting of the project?

Effectiveness

10. To what extent has the project resulted in improved knowledge on illicit financial flows, money laundering and the financing of terrorism?
 - a. (Investigation of relevant outputs related to (i) raising awareness and (ii) utilizing GPML tools)
11. To what extent did the project contribute to Member States having effective and updated AML/CFT legal frameworks and necessary law enforcement skills in AML/CFT according to international standards?
 - a. (Investigation of relevant outputs related to (i) reviewing and enhancing the AML/CFT legal framework in alignment with international standards, and (ii) training national stakeholders to deal with AMF/CFT)
12. To what extent did the project contribute to enhanced national, regional, and international coordination and cooperation on AML/CFT matters?
 - a. (Investigation of relevant outputs related to (i) creation of formal and informal networks among AML/CFT professionals, (ii) provision of technical advice to inter-regional and international stakeholders dealing with AML/CFT, (iii) Enhanced mechanisms and tools by Member States for

bilateral and multilateral cooperation, and (iv) creation of informal, regional networks for the confiscation and forfeiture of criminal proceeds.

Sustainability

13. Do you think stakeholders are committed to the project's results and objectives?
 - a. Has the ownership of stakeholders been achieved by the project? How so?
14. 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?
15. What aspects of sustainability were incorporated into the project?
 - a. What are the sustainability elements 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

16. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project design?
17. 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?
18. 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.

19. What lessons can be learned from the implementation of the project in order to improve performance, results, and effectiveness for any similar future projects?
20. What best practices emerged in the project that you think can be replicated in other projects?
21. How do you think could future programming improve its technical support and in what areas?

INTERVIEW QUESTIONS FOR PARTNERS:

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

Relevance

2. 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?
3. Do you think the project design and implementation was relevant to the needs of relevant stakeholders? How so?

Coherence

4. Do you think the project is in line with the SDGs, especially SDG 16?

- a. How so?
- 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. Given your partnership with the project, 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?
- 7. 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?
- 8. How was the project monitored?
 - a. Were you asked to provide feedback on the project? How frequently were you consulted?

Effectiveness

- 9. 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?
- 10. 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 improved knowledge on illicit financial flows, money laundering and the financing of terrorism?
 - 1. Can you tell me how the knowledge of relevant stakeholders on AML/CFT improve as a result of this project? Can you provide examples?
 - 2. Are you aware of any GPML tools utilized by the project in its provision of technical support and mentoring? How effective were these tools?
 - a. Are you aware of any GPML databases or documents, tools used for preparing APG (or FATF) relevant papers, reports and studies or national level outputs? How?
 - ii. To what extent did the project contribute to Member States having effective and updated AML/CFT legal frameworks and necessary law enforcement skills in AML/CFT according to international standards?
 - 1. How has the AML/CFT legal framework changed since 2019, especially regarding its alignment to international standards? To what extent was this change a result of UNODC's technical support and guidance?
 - 2. What about the capacity of relevant stakeholders in the area of AML/CFT? Have capacities improved as a result of capacity building support provided by the programme? Please provide examples.
 - iii. To what extent did the project contribute to enhanced national, regional, and international coordination and cooperation on AML/CFT matters?
 - 1. Are you aware of any formal or informal network among AML/CFT professionals in your country? Did the project support the establishment of these networks? How effective are these networks in improving cooperation and coordination among relevant stakeholders? (examples needed)
 - 2. Did the project provide any useful tools that can help facilitate cooperation with other states?
 - 3. Are you aware of any informal regional networks for the confiscation and forfeiture of criminal proceeds? How has the project supported such networks?
- 11. How was the level of coordination with the project? To what extent did the project's partnerships enhance its effectiveness in contributing to its outcomes?
- 12. In your opinion, what makes GPML's assistance unique? What are GPML's strengths under the GLOU40 project? What do you see as the main added value provided by the GLOU40 project staff and mentors?

13. Did you or your organization provide support in preparing for the FATF or APG Mutual Evaluation process or other related APG meetings (or FATF) in the last three years? To what extent?
 - a. If yes, to what extent do you think the project contributed to this process and its outcomes? How so?
14. Do you think donor technical assistance in the area of AML/CFT coordinated to avoid duplication and maximize impact? Please provide examples
15. To what extent do you think the project overall contributed to preventing and suppressing illicit financial flows from drugs and crime in the Mekong according to international standards? How so?
 - a. Do you have any data or information that shows an increased detection and reporting of suspicious transactions?

Sustainability

16. Do you think relevant stakeholders will continue working towards the project's results and objectives following its completion?
 - a. Please describe future plans and actions with this regard to AML/CFT?
17. 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?
18. What aspects of sustainability were incorporated into 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?
20. 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

21. What lessons can be learned from the implementation of the project to improve performance, results, and effectiveness for any similar future projects?
22. What best practices emerged in the project that you think can be replicated in other projects?
23. How do you think could future programming improve its technical support and in what areas?

INTERVIEW QUESTIONS FOR DIRECT BENEFICIARIES:

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

Relevance

2. Was the project relevant to your needs and priorities? How so?
3. 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

4. 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

5. 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?
6. How was the project monitored?
 - a. Were you asked to provide feedback on the sessions attended? How?

Effectiveness

7. 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?
8. 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 improved knowledge on illicit financial flows, money laundering and the financing of terrorism?
 1. Can you tell me how your knowledge on AML/CFT improve as a result of this project? Can you provide examples?
 2. Are you aware of, or using any GPML tools utilized by the project in its provision of technical support and mentoring? How effective are these tools?
 - a. Are you aware of any GPML databases or documents, tools used for preparing APG (or FATF) relevant papers, reports and studies or national level outputs? How effective are these?
 - ii. To what extent did the project contribute to Member States having effective and updated AML/CFT legal frameworks and necessary law enforcement skills in AML/CFT according to international standards?
 1. How has the AML/CFT legal framework changed since 2019, especially regarding its alignment to international standards? To what extent was this change a result of the project's technical support and guidance?
 2. What about your capacity in the area of AML/CFT? Have capacities improved as a result of capacity building support provided by the programme? Please provide examples.
 - iii. To what extent did the project contribute to enhanced national, regional, and international coordination and cooperation on AML/CFT matters?
 1. Are you aware of any formal or informal network among AML/CFT professionals in your country? Are you part of the network? Did the project support the establishment of these networks? How effective are these networks in improving cooperation and coordination among relevant stakeholders? (examples needed)
 2. Did the project provide any useful tools that can help facilitate cooperation with other states?
 3. Are you aware of any informal regional networks for the confiscation and forfeiture of criminal proceeds? How has the project supported such networks?
9. Overall, are you satisfied with the assistance provided by the project?
10. In your opinion, what makes GPML's assistance unique? What are GPML's strengths under the GLOU40 project? What do you see as the main added value provided by the GLOU40 project staff and mentors?
- 11.

Sustainability

12. Will you continue working towards the project's results and objectives following its completion?

- a. Please describe future plans and actions with this regard? Will you build on the project's results? How?

13. What aspects of sustainability were incorporated into the project?

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

14. Are you aware of any human right violation or discrimination that occurred during the project's activities? If yes, were these reported? To whom? If not, why not?
15. To what extent were human right considerations, including the rights of marginalized groups, and gender equality taken into account in the project?
16. 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

17. What lessons can be learned from the implementation of the project in order to improve performance, results, and effectiveness for any similar future projects?
18. What best practices emerged in the project that you think can be replicated in other projects?
19. How do you think could future programming improve its technical support?

ONLINE SURVEY/QUESTIONNAIRE

"The UNODC is currently implementing a final independent project evaluation of its project 'Combatting Money Laundering and Terrorism Financing in the Mekong Project' (phase II 2019-2023) which aimed at assisting Member States (Cambodia, Lao PDR, Myanmar, Viet Nam) to prevent and suppress illicit financial flows from drugs and crime and to implement UN conventions and internationally accepted standards for anti-money laundering and the counter-financing of terrorism (AML/CFT). The project provided technical assistance, training and mentoring advice and supported capacity building to various stakeholders in Cambodia, Lao PDR, and Viet Nam including government officials, prosecutors, legislators, judges, FIU personnel, and others. The evaluation of this project is currently being carried out by a team of external independent evaluators, consisting of an Evaluation Expert (Rani Khoury) and a Substantive Expert (Timothy Bacwa).

Given that you have benefited from this project and attended one or more of its various sessions, we would appreciate it if you can take around 10 minutes of your time to fill in this survey to inform UNODC's future programming.

This survey 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 and to improve future UNODC programming. Your participation in the survey will be highly appreciated but remains voluntary and you may withdraw from it at any moment.

If you have any questions or comments, please do not hesitate to get in touch with us.

Thank you for your cooperation.

1. Background Information

1.1. Choose gender

Female

Male

Prefer to self-identify

Prefer not to answer

1.2. Please state your country of residence

1.3. Please state your occupation

1.4. Do you have a direct or indirect role in law enforcement that supports AML/CFT compliance in the country?

Yes

No

1.5. What training or mentoring did you receive from this project (please select more than one if applicable)?

____(drop down menu with the main training headings if applicable)____

1.6. When did you receive the training (please state more than one if applicable)?

1.7. Where did you receive the training (please state more than one if applicable)?

2. Relevance

2.1. Do you think the training, mentoring, or other technical assistance received was the most suitable tool to raise your capacity in your work on AML/CFT?

Yes

No

If no, what better tool can you think of?

2.2. Were you consulted on the topics of the training, mentoring, or any technical assistance received beforehand?

Yes

No

Can't remember

2.3. Were the goals and objectives of the training, mentoring, or any technical clearly stated beforehand?

Yes

No

Can't remember

2.4. To what extent do you think the training, mentoring, or any technical assistance received is relevant to your professional needs and career?

Very Much

Somewhat

Undecided

Not Really

Not at All

2.5. To what extent do you think the training, mentoring, or other technical assistance received is relevant to your country's strategic direction in AML/CFT?

Very Much

Somewhat

Undecided

Not Really

Not at All

2.6. Comment on relevance: _____

3. Efficiency

3.1. To what extent do you think the training, mentoring, or other technical assistance was implemented according to schedule and on time?

Very Much Somewhat Undecided Not Really
 Not at All

3.2. Was the size of your training group appropriate?

Very Much Somewhat Undecided Not Really
 Not at All

3.3. Were you asked to fill out an assessment questionnaire/form before the training, mentoring, or other technical assistance received?

Yes No

3.4. Were you asked to fill out a questionnaire/form after the training, mentoring, or other technical assistance received?

20. Yes No

3.5. Comment on efficiency: _____

4. Effectiveness

4.1. Was the quality of the training or mentoring content and method of instructing or assistance provision consistent throughout the training?

Yes No

4.2. How engaging would you say the overall training, mentoring, or other technical assistance content was?

Very Much Somewhat Undecided Not Really
 Not at All

4.3. How would you rate the quality of the training, mentoring, or other technical assistance including content and method of instructing? (1= unacceptable and 10= outstanding)?

4.4. To what extent do you think you benefitted from the training, mentoring, or other technical assistance received in your profession in AML/CFT?

Very Much Somewhat Undecided Not Really
 Not at All

4.5. (If answered "very much" or "somewhat" in 4.1): Please describe in a few sentences how you benefitted from the training in your profession

4.6. To what extent do you think the instructor(s)/advisor were qualified and competent to provide the training/mentorship/technical assistance?

Very Much Somewhat Undecided Not Really
 Not at All

4.7. Have you applied any of the training, mentoring, or other technical assistance received in your work?

Yes No

4.8. If answered yes, please provide an example of how you used what you learned in your work?

4.9. To what extent did your participation in the training allow you to gain a deeper knowledge on illicit financial flows, money laundering, and the financing of terrorism?

- Very Much Somewhat Undecided Not Really
 Not at All

4.10. To what extent did the project contribute to enabling member states to have effective and updated AML/CFT legal frameworks and necessary law enforcement skills and practices to prevent and combat illicit financial flows from drugs and crime in accordance with international standards?

- Very Much Somewhat Undecided Not Really

Not at All

Comment: _____

4.11. To what extent did this project improve the level of cooperation on AML/CFT on the national level?

- Very Much Somewhat Undecided Not Really

Not at All

How so? _____

4.12. To what extent did this project improve the level of cooperation on AML/CFT on the regional and international levels?

- Very Much Somewhat Undecided Not Really

Not at All

How so? _____

4.13. Comment on effectiveness: _____

5. Sustainability

5.1. To what extent do you think that the skills and knowledge learned during the training, mentoring, or other technical assistance will continue to benefit you for years to come?

- Very Much Somewhat Undecided Not Really

Not at All

5.2. Are you committed to continue working towards the objectives of this project after its end?

- Very Much Somewhat Undecided Not Really

Not at All

5.3. Do you think the project's results are likely to have a long-term impact for your country (in terms of strategy, policy, practice) in the area of AML/CFT?

- Very Much Somewhat Undecided Not Really

Not at All

Comment on sustainability: _____

6. Human Rights, Gender Equality, and Leaving no one behind

- 6.1. Did you or any other participant experience any discriminatory practices or practices that would jeopardize human rights throughout the intervention?
 Yes No (Go to Q. 6.3) Prefer not to say (Go to Q. 6.3)
- 6.2. (if yes) Were appropriate steps taken to ensure you receive appropriate care and protection
 Yes No Prefer not to say
- 6.3. Were you aware of the mechanism to report any discriminatory practices that would jeopardize human rights?
 Yes No Prefer not to say
- 6.4. Do you think that women were fairly represented among participants?
 Yes No
- 6.5. Did the project assist your country to strengthen its upholding of human rights, gender equality principles, LGBTQI+ issues within the context of strengthening AML/CFT?
 Yes No
 If yes, How so?

7. Lessons learned and best practices

- 7.1. Would you recommend the training to other professionals working in the same field as you?
 Yes No
- 7.2. If you had the opportunity to go back and be part of the project again, what would you like to see done differently?

- 7.3. Do you have any suggestions to improve such trainings in the future?

Thank you very much for your participation in the evaluation survey! Your insights and experiences in the project will help inform future UNODC programming in the region and globally.

ANNEX IV: DESK REVIEW LIST

UNODC DOCUMENTS

Document – name
1. SECO_Mekong_Proposal_24_April_2018
2. SECO_Mekong_Proposal_Logframe_UNODC_II
3. 20181126_UNODC_SECO_GLO_U40_Mekong_Funding_Agreement_Fully_Signed
5. 20230710-Amendment_Switzerland_SECO_NCE_until_31_March_2024
6. GPML Mekong Region - Swiss Annual Report - 2020 – Final
7. GPML Mekong Region - Swiss Annual Report - 2021 - Final
8. GPML Mekong Region - Swiss Annual Report - 2022 - Final
9. 230912 - IPE of GPML-Mekong_Evaluation Tor_ CLEARED including ET annexes - IES
10. GLOU40-Mekong_region_final_evaluation_report_March_2017
11. Monthly reports 2019
12. Monthly reports 2020
13. Monthly reports 2021
14. Monthly reports 2022
15. GPML-Mekong_Training_WP_2021-2024_v4
16. Pocket Guide
17. 2023.04.26 IFF Mekong Report final
18. 2022.04.25 SE Asia IFFs Report Final
19. GPML GLOU40 ProDocs
20. David Frend - PHP and CV
UNODC Toolkit for Evaluating Interventions on Preventing and Countering Crime and Terrorism
HRGE Handbook
UNEG-Norms-Standards-for-Evaluation-2016
UNODC Evaluation Handbook
UNODC-IES Inception Report Guidelines
Evaluation Inception Report Template

EXTERNAL DOCUMENTS

Document – name
21. Cambodia MER 2017
22. Lao PDR MER 2011
23. Viet Nam MER 2022
24. Briefing notes

25.APG Technical Assistance Overviews
26. Viet Nam – APG Strategic Implementation Planning Tool
APG-Mutual-Evaluation-Report-Myanmar
Myanmar FUR 2019
Lao PDR MER 2023 - published version
APG-Follow-Up-Report-Cambodia-2021
APG-Follow-Up-Report-Cambodia-2022
Cambodia FUR 2018
Cambodia FUR 2019
Cambodia FUR 2021
Cambodia FUR February 2022
Cambodia FUR February 2023

ANNEX V: STAKEHOLDERS CONTACTED DURING THE EVALUATION

Number of stakeholders	Type of stakeholder (see note below)	Sex disaggregated data	Country(ies)
26	Government recipients and beneficiaries, including FIUs and LEAs	Male:15 Female:11	Viet Nam (in-person) LAO (in-person) Cambodia (in-person)
6	Partners	Male:5 Female: 1	Australia (remote), Vietnam (in-person) Lao (in-person)
8	UNODC regional and field offices	Male:2 Female:6	Bangkok (remote) Viet Nam (in-person) Lao PDR (in-person)
5	UNODC HQ and Donor	Male:3 Female:3	Austria (remote) Switzerland (remote)
Total:	46	Male: 25 Female: 21	

Note: A stakeholder could be a Civil Society Organisation; Project/Programme implementer; Government recipient; Donor; Academia/Research institute; etc.

STAKEHOLDERS PARTICIPATING IN SURVEYS OR OTHER FORMS OF WRITTEN FEEDBACK:

Type of stakeholder	Number of responses	Sex disaggregated data
Beneficiaries	60	Male: 44 Female:16

Note: there may be stakeholders interviewed and the same individuals may also have replied to surveys, which cannot be tracked to ensure confidentiality and anonymity. Therefore, these numbers cannot be combined.

ANNEX VI: IMPLEMENTATION GUIDANCE FOR RECOMMENDATIONS

RECOMMENDATION 1 – PLANNING AND TAILORED PROGRAMMING

Given that GPML has been active in the Mekong region for more than a decade providing technical assistance mostly in the form of foundational basic trainings and advisory, it is recommended that GPML Mekong project conduct a comprehensive needs assessment and gap analysis of the situation of AML/CFT and related capacities in each of the member states utilizing previous evaluation reports, MER and FUR country reports, intelligence, National Risk Assessments, ICRG and national level action plans, as well as formal/informal engagement with the relevant agencies in the 4 target countries in the Mekong region.

The outputs of the above process would then feed into the design of specific and tailored programme for each of the countries that is based on their identified priorities and anchored in GMPL. Specifically, a log frame should be developed for each of the countries depending on their AML/CFT needs and include legislative, institutional, and skills-related reforms, focusing on the strengths and competitive advantage of GPML compared to other technical assistance providers in the region.

This will ensure a planning approach to implementation, while still maintaining some element of flexibility, which should facilitate the engagement of counterparts. The national log frames of project plans should be based on each country's requirements based on FATF MERs and other knowledge products such as the NRA to ensure cooperation and engagement from government counterparts. A formalized ICRG process support plan may be considered to ensure that project activities are targeted and proactive (rather than reactive), and to ensure maximum impact. This will help in mitigating 'firefighting approaches' when dealing with ad-hoc country requests as and when the need arises. For example, some areas to be focused on may include supporting the FIUs to roll out risk-based approaches to managing AML/CFT risks, that incorporate all reporting entities, especially high-risk reporting entities in the private sector (e.g., casinos, real estate, financial service providers, dealers in precious metals and stones... etc.). Given the situation of Lao PDR and Viet Nam in relation to the ICRG process, it is a suitable time to engage with and focus on these two member states moving forward. The following general directions is proposed for each of the countries:

Vietnam

Viet Nam has recently adopted and endorsed a national action plan to respond to the FATF recommendations, allocating roles for each partner and designating FIU as the main coordinator body for implementing the action plan, which provides ample opportunity for the project to expand engagement. It is recommended that the UNODC GPML Mekong project support the country in implementing this plan to assist in its eventual removal off the grey list. Devising a two-year plan that is aligned with the national work plan, yet remaining in line with GPML programme priorities, may facilitate an improvement in the level and depth of engagement with counterparts. The main counterpart in this case is the FIU (AMLD under the SBV) which has a dual role in the action plan of implementing its part and acting as a focal point to coordinate the whole implementation process among stakeholders. Given also that a new anti-money laundering law was recently enacted in Viet Nam, the project may also consider supporting the operationalization of the law through reviewing the necessary associated regulations in addition to building the capacity of law enforcement to support the enforcement of the new law. The mentorship component should be adapted to the context of Viet Nam, i.e., should be focused on providing ad-hoc advisory services whenever requested.

Lao PDR

The results of the latest MER for Lao PDR were recently published in August 2023, and thus provides an opportunity through which the project can tailor its future programming. It is recommended that the project assists Lao PDR in putting in place a concrete work plan to address the deficiencies highlighted in the latest MER, and then support its implementation by providing relevant capacity building activities. Furthermore, the project should focus exclusively on inter-agency activities and events to enhance the level of national

coordination among relevant stakeholders and improve the effectiveness of the planned capacity building. Given the current relatively low capacities in Lao PDR, the project may consider including specific case mentorship in a manner that does not infringe on confidentiality, to maximize the use of technical assistance to the country.

Cambodia

The project's engagement with Cambodia is currently at risk given the unavailability of funding to implement further programming. It is recommended for the GPML Mekong project to try and secure alternative financing for Cambodia to build on the momentum gained over the past few years and maintain the relationships built with counterparts. This may help ensure the sustainability of the successful results achieved during this project's lifetime.

Myanmar

Re-engagement with Myanmar should be considered a priority area, to the extent possible, since it was placed on blacklist in October 2022. If possible, the project should focus on providing AML/CFT support to enable the country to improve its engagement with the international community including with the APG and FATF, to address its significant AML/CFT legal, institutional and operational deficiencies, as well as to follow through with legislative amendments and other TA initiatives that the project had commenced prior to February 2021. Re-engaging with Myanmar is thought to be particularly important given the risks of the spillover effects to the region from the rising rates of criminality and illicit financial flows, especially in the golden triangle area.

Based on findings 1 (Relevance), 3 (Relevance), 16 (Efficiency), 24 (Effectiveness), 26 (Effectiveness), and 30 (Sustainability)

RECOMMENDATION 2 – EFFECTIVE RELATIONSHIPS

Given the central importance of having the right relationships with the right people in the Mekong region, it is recommended that the GPML project continues and further focuses on building and maintaining relationships with top-level executives considered to be the main decision makers in each of the stakeholder entities. Specialized AML/CFT TA may be considered targeting the top leadership of stakeholder entities to further raise their awareness of the importance of developing a robust national AML/CFT framework and how the project can support such a development. Furthermore, this may provide an opportunity for the project to showcase the GMPL's support as a means to support the country in meeting the recommendations of the MERs and avoid the negative repercussions associated with being placed on the grey list. This may contribute to a greater buy-in from these stakeholders to the project results in future programming and may greatly facilitate the planning and implementation of project activities across the different countries. *Based on findings 16 (Efficiency), 24 (Effectiveness), 27 (Effectiveness), 30 (Sustainability)*

RECOMMENDATION 3 – SUSTAINABILITY & CAPACITY BUILDING

While the project had initial plans to implement a ToT approach to its trainings and utilize the various academies present across the region, this could not be implemented during the course of this project for multiple reasons as explained in the findings sector above. It is therefore recommended for the GPML Mekong project to adopt a ToT approach in future capacity building and institutionalize the foundational trainings in the respective training academics present across the region. Given that the GPML has been providing foundational trainings in various member states of the region for more than a decade, the time has now come to institutionalize this training and adopt a ToT approach which may greatly enhance the sustainability of future programming, and may allow the project to focus on more advanced topics in its capacity building and focus more on providing guidance and advice to the various stakeholders in each of the countries. The ToT programme should be specific and should target a selection of motivated, skilled, and influential individuals in the law enforcement framework. These individuals should be given introductory, advanced, and specialized trainings, tools, and other support, in order to cascade the AML/CFT trainings to all institutional levels, leveraging on the existing national academies.

Along with the institutionalization of basic trainings, the GPML Mekong is recommended to gradually shift to more advanced trainings that may include supporting the development of risk-based approaches of complying with AML/CFT and address specific high-risk sectors such as VASPs, real estate, casinos, precious metals, financial services industry among others. Such support could be extended to include designing operational guidelines and recommendations for each sector, providing technical support to each of the key sectors including regulatory bodies, to enhance the number and quality of STRs generated. These initiatives may ensure that there is deepened institutional support provided for sustainable gains over and above ad-hoc trainings provided on a periodic basis and may help to address the pervasive deficiencies of using risk-based approaches to manage ML/TF related risks, an area that has mostly remained unaddressed by most TA players in the Mekong region, especially in Lao PDR and Viet Nam. It is recommended to focus on emerging trends in AML/CFT including the use of crypto currency and virtual assets in ML.

More foundational awareness raising trainings and sessions should be focused on the private sector, i.e., reporting entities across a number of high-risk sectors. The capacity of reporting entities should be built to comply with AML/CFT requirements in order to improve the number, quality, and timeliness of STRs and overall compliance. *Based on findings 18 (Effectiveness), 29 (Sustainability)*

RECOMMENDATION 4 – PARTNERSHIPS

Many of the evaluation findings positively point towards the partnerships that the project developed and utilized in its delivery of activities, especially during the second half of the project cycle. The partnerships have helped mitigate any adverse impacts from the turnover of the mentor position of the project in addition to contributing to the overall efficiency and effectiveness of the project. The GPML Mekong should continue with this proactive approach to partnerships to further enhance coordination among partners, as well as improve the efficiency and effectiveness of future programming.

Based on findings 8 (Coherence), 14 (Efficiency), 20 (Effectiveness)

RECOMMENDATION 5 – NATIONAL & REGIONAL COOPERATION

The project is recommended to further enhance national cooperation in each Member State and focus more on regional cooperation.

On the national level: notwithstanding the challenges that organizing inter-agency project activities often poses, (where a culture of silo institutional working is the norm), the GPML Mekong project should continue its strong focus on inter-agency focused project activities, without exception. Future programming should also design and disseminate inter-agency operational guidelines and other necessary tools to help foster inter-agency cooperation and joint activities between the relevant stakeholders.

In addition to the above, the project may consider incorporating activities in future programming that aim towards the formation of AML/CFT financial investigation taskforces to work on some of the most complex ML/TF related cases, to the extent feasible and practical. The nominees to the task force would then become suitable case mentorship candidates for future programmes to foster inter-agency collaboration and overall sustainability over time. The project can benchmark on other regions around the world where such models have been relatively successful.

On the regional level: the project may consider focusing more on regional activities that may include two or more targeted member states. Tools related to regional cooperation may be presented to enhance the discussion. Such regional activities provide an opportunity for Member States to learn from one another and share experiences and best practices, and also helps in enhancing the level of regional coordination through the formal or informal relationships and networks. The project is recommended to continue promoting regional networks among participants.

Based on finding 20 (Effectiveness)

RECOMMENDATION 6 – M&E AND REPORTING

The GPML Mekong project is recommended to enhance its monitoring and evaluation framework in the design of future programming in addition to improving reporting during implementation. A robust M&E framework should be included in the project design along with SMART indicators and feasible sources of information/verification. A process for monitoring project outputs and outcomes should also be incorporated into the monitoring framework. Future programming should ensure that periodic reporting is done against the specific outputs, outcomes and overall project objective as outlined in the log frame, over and above activity reporting. Project budgets should include financing for periodic outcome-level monitoring and reporting, in addition to the final evaluation usually conducted by the end of the project cycle. Furthermore, the project should ensure that it has in place a central database of all project beneficiaries and their contact details to ensure the scope of duplication and keep a track record of beneficiaries across the whole timeframe of the project. Reporting should also be made more consistent, presenting gender disaggregated figures and synthesized feedback from participants in every progress report.

Based on finding 17 (Efficiency)

RECOMMENDATION 7 – HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION

The GPML Mekong project is recommended to pay more attention to incorporating cross cutting issues of human rights, gender equality and disability inclusion in the design and implementation of future programming wherever possible and feasible. Examples include:

- Identifying future female trainers, for AML/CFT programs;
- Conducting relevant research on women's role in ML/TF, law enforcement efforts and gender sensitive legislative gaps;
- Design specific modules and relevant tools to sensitize law enforcement authorities on the prevention of abuse of AML/CFT laws, in a manner than 'causes no harm'. Relevant publications and case studies e. g the FAFT papers, Civil Society coalition reports on this topic should be used.
- Introducing gender-sensitive modules to the training provided as well as gender-sensitive case studies
- Making all project participants aware of a mechanism to report any discrimination of human rights violation
- Inclusion of a section on human rights, gender equality, and disability inclusion in the project's annual progress reporting

Future programming may also consider screening project beneficiaries for human rights abuses, financial crimes, and other such violations, e.g., using the UNSC sanction lists. However, this must only be done to the extent feasible and practical, by for example, benchmarking other relevant TA providers who have done it successfully, and by strictly upholding the principles of 'doing no harm'. Careful consideration should be made not to threaten the project sustainability and the relationships built with stakeholders during this process.

Based on finding 3 (Human Rights, Gender Equality & Disability Inclusion)