

# FINAL INDEPENDENT PROJECT CLUSTER EVALUATION OF “UNODC’S WORK ON STRENGTHENING BUSINESS INTEGRITY”

This evaluation includes the following projects:

- UNODC GLOBAL INTEGRITY EDUCATION (GLOZ99) SEGMENT; AND
- MYANMAR SUB-PROGRAMME 2: STRENGTHENING THE INTEGRITY AND ANTI-CORRUPTION EFFORTS OF THE PRIVATE SECTOR IN MYANMAR (MMRZ36).

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**UNODC**

United Nations Office on Drugs and Crime

This independent evaluation report was prepared by an evaluation team consisting of Mr. Angus Henderson and Mr. David Schmidt. 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.

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# ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Full name/word	Abbreviation or Acronym	Full name/word
BIM	Business Integrity Myanmar <sup>1</sup>	ToC	Theory of Change
CSOs	Civil Society Organizations	UN	United Nations
E4J	Education for Justice	UNCAC	United Nations Convention against Corruption
GDP	Gross Domestic Product	UNCT	United Nations Country Team
GIE	Global Integrity Education	UNDP	United Nations Development Programme
HR	Human Resource	UNODC	United Nations Office on Drugs and Crime
PS	Private Sector	UNSDCF	United Nations Sustainable Development Cooperation Framework
SDG	Sustainable Development Goals	USD	United States Dollars
TI	Transparency International	INGOs	International non-governmental organizations

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<sup>1</sup> “Business Integrity Myanmar” (BIM) has been used to refer to the project “Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar” (project code MMRZ36) for purposes of brevity in this evaluation.

## MANAGEMENT RESPONSE

Recommendations <sup>2</sup>	Management Response
1. UNODC's Corruption and Economic Crime Branch should ensure that future projects include a resource line for sustainment planning and implementation. Future education or business integrity type projects should plan, budget and resource intentionally for sustainability.	Accepted
2. UNODC's Corruption and Economic Crime Branch should identify an appropriate long-term delivery agent in the initial stages of any future project. Future projects of this nature have the potential to be sustained by local actors. UNODC has significant convening power and legitimacy, but it can lack the internal resources to manage the complexity involved in scaling these initiatives to their full potential and sustaining them over time. This requires an appropriate local entity with sufficient resources and connectivity.	Accepted
3. UNODC's Corruption and Economic Crime Branch, when planning to implement future projects that seek to deliver mass effect, in education or across the private sector, should seek to involve other UN agencies or multi-lateral partners. Anti-corruption and integrity work aims to deliver societal change which requires engagement with youth, school, academia, business and the government and should be an integral element of any UNSDCF.	Accepted
4. UNODC's Corruption and Economic Crime Branch should ensure that future projects develop a stronger evidence-based logic regarding the long-term impacts of ethical education for students and the integrity performance of private sector organizations that employ them.	Accepted
5. UNODC's Corruption and Economic Crime Branch should ensure that future projects are based on realistic timeframes that accommodate the inevitable and typically uncertain lags in partner decision-making processes.	Accepted
6. UNODC's Corruption and Economic Crime Branch should include resources for university-based research that supports GIE. Such a research component would strengthen the credibility of the programme in academia and produce new knowledge regarding integrity, ethics and anti-corruption action for the private sector which will translate into improved teaching over time.	Accepted

<sup>2</sup> This is just a short synopsis of the recommendation, please refer to the respective chapter in the main body of the report for the full recommendation.

## INTRODUCTION

### CONTEXT AND CLUSTER INTERVENTION LOGIC

This evaluation covered two UNODC projects. The Global Integrity Education (GIE) segment of the Global Programme (GLOZ99) and the Business Integrity in Myanmar (BIM) segment of the Myanmar Country Programme (MMRZ36). Both projects sought to prevent and combat corruption through the implementation of the United Nations Convention against Corruption (UNCAC) in the private sector rather than the public sector, since it contributes more to GDP.<sup>3</sup> GIE focused on strengthening ethics education at universities in Pakistan, Mexico, and Kenya, while BIM focused on directly supporting the private sector with online tools and training in Myanmar. All four countries have high levels of perceived corruption<sup>4</sup> and low levels of anti-corruption controls.<sup>5</sup> Although neither project was designed with a specific gender dimension, the material on which the projects were based included some gender, human rights and diversity modules, which were then localized using gender and diversity considerations<sup>6</sup>.

The projects were funded by the Siemens Integrity Initiative, as part of the third tranche of their Integrity Initiative. BIM had an allocated budget of USD 800,000 and GIE USD 1,000,000. At the time of the evaluation BIM had spent USD 791,728 and GIE USD 930,678.

### EVALUATION PURPOSE, SCOPE, INTENDED USE AND METHODOLOGY

The purpose of this evaluation is to assess the impact of UNODC interventions and inform the development of similar UNODC projects. The intended users are the funder and UNODC management teams. The report evaluated project activities in Kenya, Mexico, Pakistan and Myanmar between Oct 2019 – Sept 2023<sup>7</sup>.

The evaluation used a mixed-method, inclusive, and participatory approach to analyse two projects through a comparative framework. It identified common objectives, outcomes, and indicators, and utilized group interviews, individual interviews, surveys, and a desk review for data collection, facilitating cross-referencing and triangulation to draw conclusions, identify lessons learned, and make recommendations.

Quantitative and qualitative data were gathered to assess each project's performance and impact, identifying cross-cutting themes, shared challenges, and best practices. Group discussions and stakeholder feedback enriched these findings. Primary data included online interviews, surveys, and group interviews, while secondary data sources encompassed documents from the project teams and external agencies.

Anonymity was ensured through anonymous online surveys, and data was aggregated to prevent tracing individual responses. The evaluation adhered to the principle of "do no harm," ensuring participants' safety and well-being, obtaining informed consent, and being sensitive to cultural and social contexts. Human rights, gender equality, disability inclusion, and the principle of leaving no one behind were integrated into the evaluation, ensuring a diverse range of perspectives thus minimizing potential biases.

The evaluation was conducted by two independent evaluators. An evaluation specialist, Mr. Angus Henderson and an ethics and leadership education specialist Mr. David Schmidt.

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<sup>3</sup> From Project documentation.

<sup>4</sup> <https://www.transparency.org/en/cpi/2023>

<sup>5</sup> World Bank: Data from database: Worldwide Governance Indicators. Last Updated: 09/29/2023.

<sup>6</sup> The localized GIE modules are based on the modules developed by UNODC in the framework of the Education for Justice (E4J) initiative. Building on the success of the Education for Justice (E4J) and Anti-Corruption Academic (ACAD) initiatives, which have become globally recognized for their added value in supporting beneficiaries in Member States, UNODC launched the [Global Resource for Anti-Corruption Education and Youth Empowerment](#) (GRACE) initiative to promote further the role of education and youth empowerment in preventing and countering corruption.

<sup>7</sup> A no-cost extension was granted by the funder in October 2024 extending the project from 30 September 2023 to 31 December 2024. Considering that this took place following the drafting of the report and acknowledging that the evaluation covers the project until the end of data collection, the initial end date has been maintained in the evaluation report.

## MAIN FINDINGS

### RELEVANCE AND COHERENCE

The desk review highlighted the unique role of UNCAC as the sole legally binding universal anti-corruption framework, emphasizing its capacity to foster integrity, in both the public and private sectors. Through targeted implementation in high-corruption environments, the cluster was highly relevant in contributing towards establishing fair and clean market conditions. The GIE project, which linked universities, the private sector, and students through collaborative training and an ethics ambassador programme, was particularly imaginative and coherent. Survey responses overwhelmingly supported the relevance of these activities, reflecting their alignment with global anti-corruption efforts and the influence of education. Business Integrity in Myanmar (BIM) filled critical gaps, providing a unique platform that was not replicated by other actors. These efforts directly contributed to Myanmar's economic policy and SDG 16, focusing on building accountable and transparent institutions.

However, despite these achievements, anti-corruption efforts remain underrepresented in broader UN frameworks and development agendas, indicating a need for greater integration and emphasis in future strategies.

### EFFECTIVENESS AND EFFICIENCY

The projects largely achieved their intended outcomes, though a military coup significantly impacted UNODC's ability to operate in Myanmar. BIM aimed to strengthen corporate integrity, improve anti-corruption legal frameworks, and build capacity in the private sector. While the coup curtailed progress in areas such as improving legal frameworks and international dialogue, the project successfully engaged with private sector firms and local trade bodies, leading to the delivery of training, working groups and the creation of online tools, which remain in use today, after the project has ended.

GIE, focused on education, saw considerable success in establishing university integrity modules and empowering lecturers. The ethics ambassador programme mobilized students and enhanced the project's reach. Survey data revealed high satisfaction rates among participants, with the vast majority of lecturers continuing to use UNODC's training material after the project ended. Overall, both projects were highly effective and efficient, though their success was tempered by external challenges and their reach, limited by UNODC's own ability to upscale initiatives.

### IMPACT AND SUSTAINABILITY

The impact of the cluster projects demonstrated both immediate and sustained benefits, although the degree of impact varied in each country. In the short term, the BIM project directly influenced 22 companies and three CSOs, with ongoing use of UNODC resources, particularly the BIM website, which remains active and frequently accessed. GIE achieved substantial academic integration into 14 universities (8 in Kenya, 3 in Mexico and 3 in Pakistan), with 90% of lecturers indicating continued use of UNODC materials, potentially reaching 12,000 students in the upcoming academic year.

The long-term sustainability of these initiatives hinges on the ongoing engagement of CSOs in Myanmar and their ability to continue to access material and support their members. For the GIE project, sustainability is dependent on the ongoing support and dedication of university lecturers in Kenya, Pakistan and Mexico, by embedding ethical content into university curricula, which could foster future generations of ethical leaders. However, for both projects, challenges such as the limited capacity of local UNODC teams and the need for continual material updates to remain relevant could impact the longevity of these gains. Ensuring future sustainability may require identifying and empowering local entities to maintain and scale these initiatives.

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

Interviews and surveys indicated that UNODC material helped beneficiaries to include content that advanced, human rights and gender equality and disability inclusion. However, the actual material was

limited in explicitly engaging with issues beyond some high-level references suggesting there is considerable potential to highlight these issues much more directly in content going forward.

## MAIN CONCLUSIONS

The cluster of projects successfully addressed identified shortfalls, with imaginative, well-planned and well-resourced activities. Impact is meaningful and sustainable, and the cluster provides valuable lessons.

The cluster notably impacted business modules and university curricula, through localization of global content, which incorporated country-specific examples. This significantly increased its relevance and impact.

Despite significant challenges in Myanmar, the project raised private sector awareness and created a focal point for ongoing business integrity engagement. The resources developed remain available online, supporting continued anti-corruption efforts.

The GIE approach effectively linked universities, private sector companies, and students, fostering significant and sustainable results. This approach resonated with academic and private sector partners, successfully integrating integrity and anti-corruption content into universities in a cost-efficient manner. While the impact assessment indicated increased student understanding, there was some misalignment between the assessment and GIE's objective, enhancing the content and delivery of integrity education.

The mobilization of students as ethics ambassadors, along with the creation of supportive networks, greatly expanded the reach and effectiveness of GIE, exceeding initial expectations. This success was bolstered by international connections and online engagement, which built leadership capacity at a very low cost.

The cluster highlighted the limitations of small country teams. Both projects would have benefited from partnering with local entities that had the capacity to sustain and upscale the initiative from the outset. The cluster's limited duration hindered some potential outcomes due to inevitable delays in partner decision-making processes, particularly within universities.

## MAIN RECOMMENDATIONS<sup>8</sup>

The partnership concept that UNODC used in both projects was highly effective in leveraging support and for delivering outcomes that in many cases exceeded expectations. If these projects were proof of concept, then the concept works. The recommendations that follow should not be viewed, in the negative i.e. things UNODC got wrong, but rather in the positive, how UNODC can take the concept forward.

1. Ensure that future projects include a resource line for sustainment planning and implementation.
2. Identify an appropriate long-term delivery agent in the initial stages of any future project, and if the project is undertaking societal change, ensure the involvement of other UN agencies or multilateral partners with greater resources.
3. Ensure that future projects: are based on an evidence-based logic model that clearly identifies and articulates impact; and are based on realistic timeframes that accommodate the inevitable and typically uncertain lags in partner decision-making processes.

## MAIN LESSONS LEARNED AND GOOD PRACTICES

The evaluation identified several relevant lessons for future programming, all of which have been incorporated into the recommendations above. In addition, the evaluation identified the following good practices:

1. The localization of generic globally framed material can significantly improve the relevance and impact of the material in a particular country.
2. The GIE partnership model linking universities, private sector companies and students and the deployment of participating students as ethic ambassadors should be seen as a good practice.

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<sup>8</sup> Please note that the Executive Summary only includes the most important recommendations as identified by the evaluation team. All recommendations can be found in the main body of the report.



3. The building of vibrant student networks considerably enhanced the effect and sustainability of the integrity education programme and should be a key design principle for future programmes.
4. GIE's assessment of post-training impact that measured the effect of the training audience (the students) was extremely useful. Such assessments appear to correlate with improved teaching performance as well as providing evidence of the impact of the teaching on student understanding.

## BACKGROUND AND CONTEXT

### OVERALL CONCEPT AND DESIGN

This independent cluster evaluation reviewed segments of two UNODC projects. The Global Integrity Education (GIE) segment of the Global Programme (GLOZ99) and the Business Integrity in Myanmar (BIM) segment of the Myanmar Country Programme (MMRZ36).

Both projects sought to develop integrity and strengthen anti-corruption measures in the private sector. Anti-corruption and integrity education is often limited to the public sector; however, the private sector contributes far more to gross domestic product (GDP).

Country	Government contribution to GDP	Private contribution to GDP
Myanmar <sup>9</sup>	26%	74%
Mexico <sup>10</sup>	28%	72%
Kenya <sup>11</sup>	22%	78%
Pakistan <sup>12</sup>	19.5%	80.5%
Average	23.8%	76.2%

Table 1: Country contribution to GDP

Both projects utilized a theory of change (ToC) in their design and while the projects had a similar aim, related to fair and clean business environments, they sought to achieve effect in very different ways.

GIE promoted integrity education for the private sector by focusing on university graduates. UNODC had developed university integrity modules under the Education for Justice (E4J) initiative that addressed core issues. Working groups, in each participating country, localized selected modules to ensure that they fitted the local context. GIE also assisted students to develop communication, teamwork, creativity, critical thinking, and problem-solving skills, boosting their employability. Modules were aimed at future leaders and designed for students in multiple disciplines. The project bridged the gap between academia and business, by bringing real life ethical challenges into training modules, and engaging students after graduation, with on-the-job training and empowering interns to serve as ethics ambassadors within private sector companies. The project was implemented in Pakistan, Kenya and Mexico, countries that face significant integrity challenges that are compounded by high urbanization rates and a rapid population growth.

The 2016 UNCAC Implementation Review Mechanism's review of Myanmar highlighted significant legislative and regulatory gaps regarding the liability of legal persons, cooperation between public and private sector, whistle-blower protection and corruption in the private sector. Lack of transparency, corruption and a weak rule of law have hindered economic development in Myanmar.<sup>13</sup> Business integrity was seen as a low priority for private companies, with most yet to adopt codes of conduct or guidelines on business integrity. To address these gaps, the project sought to promote the adoption of codes and guidelines and the development of a culture of integrity within the private sector.

Although neither project was designed with a specific gender dimension or from the perspective of leave no one behind, the base material in E4J did have gender diversity modules and the localization of this material was done in a culturally and gender aware manner. It is interesting to note that a recent UNDOC study on

<sup>9</sup><https://documents1.worldbank.org/curated/en/099121923041535505/pdf/P50066313e22440fe18ccf18abc281c2e1d.pdf>

<sup>10</sup> Government spending as a percentage of GDP data from the International Monetary Fund.

<https://www.imf.org/external/datamapper/exp@FPP/USA/FRA/JPN/GBR/SWE/ESP/ITA/ZAF/IND/KEN/PAK>

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

<sup>13</sup> Project documentation.

gender and corruption indicates that all forms of education remain a master key to unlock solutions that can advance both the fight against corruption and gender equality.<sup>14</sup>

## CONTEXT

GIE and BIM both sought to prevent and combat corruption through the effective implementation of the United Nations Convention against Corruption (UNCAC) and primarily supported SDG 16 the building of strong institutions. Both projects were funded by a single private funder, Siemens, during the third tranche of its Integrity Initiative. BIM had an allocated budget of USD 800,000 and GIE USD 1,000,000, of which at the time of the evaluation BIM had spent USD 791,728 and GIE USD 930,678.

All four countries score poorly on World Bank's Ease of Doing Business Index.<sup>15</sup> A major factor is high levels of perceived corruption and poor control measures. Table 1 plots the four countries against the World Bank's control of corruption. A good score is 1.5 and a score below zero is poor. Table 2 is from the 2023 Transparency International Corruption Perception Index. 100 is a perfect score, and any score below 50 indicates chronic corruption.

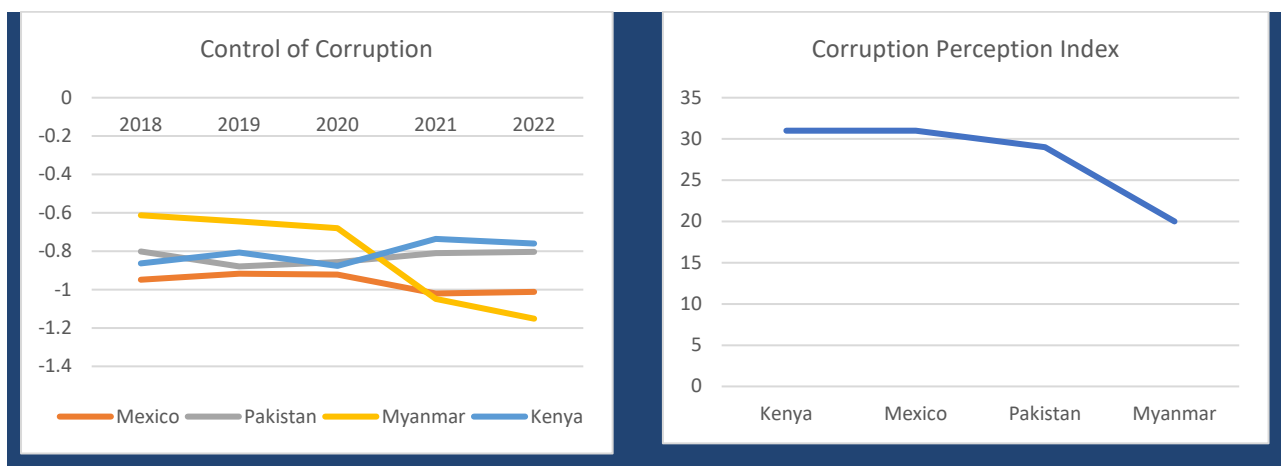


Table 2: Control of Corruption: World Bank<sup>16</sup>

Table 2: 2023 Corruption Perception Index: Transparency International<sup>17</sup>

## PURPOSE AND SCOPE

This is a final independent evaluation of two projects that have both officially ended. The purpose is to submit a final report to the funder, assess the impact of the interventions and to inform the development of similar projects in the future. The intended users are the funder, UNODC senior management, and the management teams of the Global Programme GLOZ99 and the Myanmar Country Programme, and more broadly the UNODC regional teams in Southeast Asia, South America, and Eastern Africa.

This evaluation examined GIE related activities in Kenya, Mexico and Pakistan, and BIM activities in Myanmar between October 2019 – September 2023<sup>18</sup>. It also assessed impact after the project officially ceased.

## THE COMPOSITION OF THE EVALUATION TEAM

This evaluation was conducted by two independent evaluators, one evaluation expert and one thematic expert. Mr. Angus Henderson has conducted over 40 evaluations for various UN agencies. He has assisted in developing and drafting UNODC regional and country programmes, utilizing his background in counter

<sup>14</sup> The time is now addressing the gender dimensions of corruption: UNODC 2020

<sup>15</sup> <https://data.worldbank.org/indicator/IC.BUS.EASE.XQ>

<sup>16</sup> Data from database: Worldwide Governance Indicators. Last Updated: 09/29/2023.

<sup>17</sup> <https://www.transparency.org/en/cpi/2023>

<sup>18</sup> A no-cost extension was granted by the funder in October 2024 extending the project from 30 September 2023 to 31 December 2024. Considering that this took place following the drafting of the report and acknowledging that the evaluation covers the project until the end of data collection, the initial end date has been maintained in the evaluation report.

narcotics, border control and law enforcement. Mr. David Schmidt is a leadership and integrity practitioner and lecturer with extensive experience in designing and delivering leadership and ethics programmes geared to both public and private sectors.

## EVALUATION METHODOLOGY

The evaluation used a mixed-methods, inclusive, and participatory approach, focusing on two separate projects through comparative and integrated analysis. By establishing a clear framework for analysing implementation, the evaluation identified common objectives, outcomes, and indicators, allowing for a systematic comparison while acknowledging each project's unique context and goals.

The evaluation revolved around 3 main questions linked to the DAC criteria of coherence, effectiveness and impact, as indicated in the table below:

DAC Criteria	Evaluation Questions
Relevance and <b>Coherence</b>	Did the cluster respond to identified shortfalls in a coherent manner?
<b>Effectiveness</b> and Efficiency	How well was the cluster delivered compared to the intervention logic?
<b>Impact</b> and Sustainability	What was the impact of the cluster and are these gains sustainable?
<b>Lessons Learned</b>	What should be done if UNODC was planning a similar intervention?
Human Rights, Gender Equality, Disability Inclusion and Leaving No One Behind	These cross-cutting issues were included as a series of subquestions within each of the four main questions above

Table 4: Evaluation Criteria

Primary data included interviews with key stakeholders (conducted online), surveys, and group interviews. Secondary data encompassed data from online learning, documents and archival information from the project team and external agencies such as the World Bank and Transparency International. The evaluation also reached out to CSOs and NGOs operating in the same thematic space to assess the projects' impact. All interviews and group interviews were conducted online, given that a high proportion of beneficiaries were engaged online, and English was their professional language.

Due to several previous evaluations, an UNODC impact assessment and the fact that all project activities had ceased, the evaluation team did not conduct a field visit. Instead, online interviews were conducted with main GIE stakeholders, lecturers were surveyed, and a series of follow-up group interviews with lecturers and ethics ambassadors were conducted. For BIM, the evaluation team reached out to all stakeholders via both a survey and online interviews.

Ensuring anonymity was critical to the evaluation's success. All responses were collected in a manner that disconnected them from identifiable information, using anonymous online surveys and aggregated data sources. Evaluators clearly communicated the measures in place to protect participants' anonymity and the importance of candid comments. The evaluation adhered to the principle of "do no harm" and ensured the safety and well-being of all participants. This included obtaining informed consent, ensuring confidentiality, and being sensitive to the cultural and social contexts of the stakeholders involved. The evaluator's approach was informed by the impact assessment findings, which highlighted that integrity and ethics issues varied based on religious, cultural, gender, and age differences.

To ensure an unbiased and objective approach, the evaluation triangulated sources, methods, data, and theories. The mixed-methods approach involved six key processes:

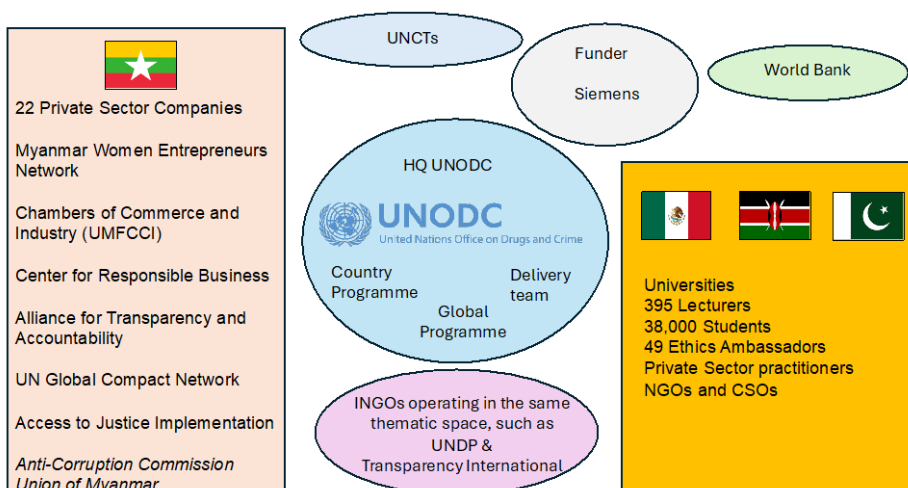
- **Inception Phase and Desk Review:** Reviewed and analysed all relevant documents, conducted initial interviews with project/regional staff to finalize the evaluation scope, questions, methodology, and tools;

- Online Information Search: Searched for information on interventions by partners and NGOs/CSOs operating in the same thematic space;
- Surveys: Conducted surveys of GIE lecturers and BIM users to gauge the usefulness and effect of the material, training, and support;
- Online Interviews: Conducted one-on-one remote interviews of key stakeholders, beneficiaries, and training recipients using semi-structured protocols;
- Comparative Data Analysis: Analysed data from surveys, online learning tools, participant feedback and GIE impact assessment, which provided quantitative data points that were tested during group interviews; and
- Group Interviews: Conducted qualitative group interviews with GIE university lecturers and ethics ambassadors.

Issues of Human Rights, Gender Equality, Disability Inclusion, and Leaving No One Behind were integrated into the evaluation through a series of cross-cutting questions within the main evaluation questions. Independence and impartiality were ensured by employing a gender-responsive and human rights-based approach. Special attention was given to including the voices and opinions of both men and women, as well as vulnerable groups. The evaluation also involved CSOs and NGOs working with women’s groups, academics studying gender issues, and NGOs representing vulnerable groups. These measures ensured a diverse range of perspectives and minimized potential biases in the evaluation process.

## STAKEHOLDER ANALYSIS

The chart below indicates the universe of stakeholders identified from project documentation and reporting.



Although the Anti-Corruption Commission of Myanmar was an initial stakeholder all interaction with government agencies ceased after the Military Coup in 2021. Therefore, it should be noted that there were no direct governmental level beneficiaries. The project was funded by Siemens for the purpose of developing anti-corruption practices within the private sector.

The table below indicates the main stakeholder groupings, the sampling method and tools used to engage each grouping.

Grouping	GIE	BIM	Sampling	Collection Tools
Universities lecturers	250 (M) 145 (F)	0	Convenience	Survey and groups discussions
Ethics ambassadors	34(M) 15 (F)	0	Convenience	Group discussions
Private sector companies	14	22	Purposeful	Survey and individual calls
CSOs and trade bodies	1	5	Purposeful	Individual calls
UNODC staff	6 (M) 13 (F)		Purposeful	Individual calls
Funder Siemens Integrity Initiative	1 (M) 1 (F)		Purposeful	Individual calls
Other: UNCTs, WB and TI	9	3	Convenience	Online data and follow-up calls

TABLE 5: Stakeholder Numbers, Sampling Method and Collection Tools.

## LIMITATIONS TO THE EVALUATION

Limitations to the evaluation	Mitigations measures
Insufficient time available to visit all four countries where the cluster was delivered and conduct face-to-face interviews.	Online communication tools, such as MS Teams, and surveys substantially mitigated the need for an in-person presence. In addition, several previous evaluations, an impact assessment, and ongoing system analytics of online learning provided a rich data source set from which to base the evaluation.
Final beneficiaries of training – students - potentially exceeded 38,000 people.	The evaluation of GIE focused on the lecturers as the key direct beneficiaries and the extent to which it improved the quality of their teaching. UNODC conducted an impact assessment of GIE which suggested significant positive impact on student’s ethical understanding. In Myanmar, the stakeholder group is relatively small, and time was set aside to conduct one-on-one interviews with all stakeholders.
The cluster covered multiple languages.	This evaluation translated surveys, and in coordination with the in-country project staff, used interpreters to assist with interviews. Interpreters were third parties, none UNODC staff, who had not previously been involved with the project. Surveys were translated with an online tool.

Table 6. Limitation to the evaluation and mitigation measures.

## II. EVALUATION FINDINGS

### RELEVANCE

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To what extent are the outcomes, outputs, and activities of the cluster relevant to the creation of fair and clean market conditions?

Finding 1. The desk review found that by supporting the implementation of UNCAC<sup>19</sup> (the sole legally binding universal anti-corruption instrument for the public and private sectors) in countries with high levels of corruption<sup>20</sup>, the projects responded positively towards the aim of creating fair and clean markets. GIE was found to be highly relevant in the implementation of UNCAC<sup>21</sup> and that UNODC had pragmatically crafted its place in the anti-corruption landscape by filling identified gaps.<sup>22</sup> Interviews found that the GIE model, of linking universities, the private sector and students; developing collaborative university-based training; and deploying interns as ethics ambassadors to be very relevant. 85% of survey respondents stated that GIE was highly relevant. The desk review found that UNODC's anti-corruption activities, and in particular BIM, were highly relevant<sup>23</sup> to the implementation of UNCAC in Myanmar. Interviews stated there was no other platform or activity similar to the BIM project. Interviews found that it was relevant to the needs of private companies. 67% of companies surveyed stated that BIM was highly relevant.

Finding 2. Interviews found that the localization of generic material, which was amended to reflect country and culturally specific case studies, regulatory context and examples, significantly improved its relevance and impact. In the case of GIE, the original educational materials were developed by the E4J initiative.<sup>24</sup> UNODC was reported as getting the right people in the room when they convened working groups, comprising international experts, local academics and local private sector representatives to prioritize content and customize it for the context in particular countries. These findings were supported by survey and interviews which indicate that not only were different modules localized in each GIE participating country, but that each country found different modules more or less relevant. In Mexico – ethics and the challenges for an ethical life, in Pakistan – behavioural ethics, and in Kenya – corruption and good governance. The GIE impact assessment found that<sup>25</sup> there were significant differences in ethics understanding among participating countries which underscored the importance of localization.

### COHERENCE

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To what extent has the cluster delivered results in line with organizational, regional and international priorities vis-à-vis the Sustainable Development Goals?

Finding 1. The desk review found that the cluster directly supported SDG 16<sup>26</sup>: building effective, accountable and inclusive institutions, with a specific focus on SDG 16.5: reduce corruption and bribery and SDG 16.6: developing effective, accountable and transparent institutions; SDG 4: Quality education, SDG 10: Reduced inequalities; and SDG 8: Decent work and economic growth. BIM directly supported Myanmar's economic policy<sup>27</sup> by improving and enforcing corporate governance, strengthening disclosure rules, enhancing audit and accounting standards, and improving regulatory and enforcement measures.

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<sup>19</sup> UNCAC [https://www.unodc.org/unodc/corruption/tools\\_and\\_publications/UN-convention-against-corruption.html](https://www.unodc.org/unodc/corruption/tools_and_publications/UN-convention-against-corruption.html)

<sup>20</sup> Data from database: Worldwide Governance Indicators. Last Updated: 09/29/2023 and <https://www.transparency.org/en/cpi/2023>

<sup>21</sup> UNODC In-depth mid-term evaluation of the Global Programme - GLOZ99 (June 2021).

<sup>22</sup> UNODC In-depth cluster evaluation of Anti-corruption projects in Mexico (May 2023).

<sup>23</sup> Annex V to the Final Evaluation of the Regional Programme for SEAP\_ Annex V Myanmar.

<sup>24</sup> <https://www.unodc.org/e4j/>

<sup>25</sup> UNODC Integrity Training Evaluation Results Report Final (INTERNAL) 2023.

<sup>26</sup> From project documentation.

<sup>27</sup> Economic policy of the Union of Myanmar, Pillar 2, Goal 3, Strategy 3.3, Action 3.3.4.

Finding 2. Interviews found that corruption is a cross-cutting risk to the achievement of the SDGs, however, despite UNDOC’s work being critical to combating corruption and the fact that it is referenced and used by other UN agencies, the issue of anti-corruption does not feature highly on the developmental agenda. The desk review found that UNODC’s work with integrity, corruption and linkages to the private sector does not feature in any of the UN plans for the 4 countries served by the cluster. The issue of corruption is hardly mentioned in the official UN literature. For: Kenya<sup>28</sup>, there are 8 occurrences, most prominently described as a risk; Mexico<sup>29</sup>, 21 occurrences mainly related to access to justice; Myanmar<sup>30</sup>, 2 occurrences related to the Anti-Corruption Commission; Pakistan<sup>31</sup>, 1 occurrence in the context paragraph.




Finding 3. The desk review found that previous UNODC involvement with CSOs in Myanmar had been limited.<sup>32</sup> However, after the military coup, the Myanmar Office pivoted away from government interaction and developed strong links with CSOs and trade bodies. It was reported in interviews that UNODC not only got the right people in the room, but that it had the right discussions. However, it should be noted that more could and should have been done to consider other actors and different points of view in Myanmar. The project focused for good reasons on Yangon, but this is not representative of the other regions.

The desk review found that GIE established valuable partnerships with universities and the private sector, both of which were reported as highly beneficial.<sup>33</sup> Interviews found that the role of private companies in preventing corruption is key and UNODC’s projects were seen as beneficial, offering a reality-check and exposing the limitations and flaws in existing rules and regulations.<sup>34</sup>

Finding 4. Interviews found that UNODC was easy to work with. It was trusted, respected, transparent and knowledgeable. UNODC was seen as a well-respected member of the UN family. However, other agencies felt that it often operated in a silo. Most other UN agencies, particularly the large and centrally funded ones, do not appreciate that UNODC has a small staff. It was reported that limited staff numbers reduced UNODC’s capacity to coherently manage large networks of stakeholders. Where UNODC had greatest effect was where it had convened meetings that were leveraged to expand the overall network. The mechanism of working with and through other organizations, to overcome internal shortfalls, was seen as very effective and delivered a far more coherent project.

## EFFECTIVENESS

To what extent did the intervention achieve intended outcomes and objective?

Objective		Achievement	Analysis
BIM	Strengthen incentives for corporate integrity and cooperation through enhancement of dialogue and regional and international exchanges		Limited achievement due to military coup and government limiting attendance of companies to participate in international forums
	Improve anti-corruption frameworks in line with UNCAC		No real progress due to the military coup
	Build capacity in the Myanmar private sector to develop new integrity tools		Engaged with 22 private sector firms and 3 CSOs and trade bodies. Developed online tools which are still in use today

<sup>28</sup> UN Sustainable Development Cooperation Framework Kenya 2022-2026.

<sup>29</sup> UN Sustainable Development Cooperation Framework of Mexico 2020-2025 (UNSDCF).

<sup>30</sup> Myanmar Sustainable Development Plan (2018 – 2030).

<sup>31</sup> UN Sustainable Development Cooperation Framework of Pakistan UNSDCF 2023 – 2027.

<sup>32</sup> Annex V to the Final Evaluation of the Regional Programme for SEAP\_ Annex V Myanmar:

<sup>33</sup> Final Independent Cluster Evaluation Report GLOX 30-32 18 FEB 2015.

<sup>34</sup> UNODC In-depth mid-term evaluation of the Global Programme - GLOZ99 (June 2021).






GIE	Create and implement university integrity modules and empower lecturers to teach the modules		This was highly effective. Workshops in each country selected and localized different material to suit the local context
	Establish ethics training programmes and networks of ethics ambassadors in the private sector		The mobilization of students through the ethics ambassadors programme, coupled with the creation of a support network, enhanced reach and effectiveness
	Bring together academia and business to promote integrity in the private sector		Most pronounced results that endure are in Pakistan. Good results in Mexico which ended when the project finished. Engagement was more limited in Kenya but there is great potential.

Table 7: Outcome results matrix<sup>35</sup>

Finding 1: Desk review and interviews found that Myanmar was a hard environment to operate in, and that this was exacerbated by the military coup. After August 2021, UN agencies stopped working with government entities, which meant that UNODC could not progress its legislative amendments and that firms traveling and cooperating in international events became more difficult. Therefore, outcomes 1 and 2 were curtailed, and the project pivoted towards outcome 3, focusing on developing practical compliance material and integrity tools.

Finding 2: Survey data found that 41% of businesses felt the BIM material had greatly improved their compliance programmes, and 25% somewhat. 34% of business reported that the material was high quality, and 50% good quality. 90% of respondents had used the model business code of conduct, and 65% had used the standard operating procedure for developing a code of conduct. 90% of respondents had used the Business Integrity Game as a useful tool to start discussions about ethics and integrity.

Finding 3: Interviews found that most firms involved with BIM did not have compliance or legal staff, and that general managers and HR staff were responsible for these functions. Surveys confirmed that mainly managers and HR staff attended UNODC training. For most firms, somewhere between 2-5 staff attended UNODC training and workshops, which equates to about 80 staff having received UNODC training.

Finding 4: Survey data found that 62% of GIE respondents stated that UNDOC's training was high quality, and 34% good quality. 56% stated that the GIE material provided to universities was high quality, and 44% good quality. 79% of lecturers stated that UNODC's material had greatly improved their course content, and 17% somewhat improved content. Interviews confirmed that the UNDOC material and training resulted in the integration of ethics material into existing courses, the creation of new integrity courses, and that it assisted lecturers to apply new, more interactive and practical teaching methods. 74% of university lecturers stated that the project enabled them to access private sector involvement and 26% stated that it had not enabled them. Pakistan reported the highest rate (86%) of business engagement, Mexico (66%) and Kenya (50%). Interviews found that companies in Mexico felt that although UNODC's material was useful, they already had their own compliance and training programmes, which the material only complemented. The result was markedly different in Pakistan where most companies interviewed gladly received UNODC's material and training and continue to actively use it. Although good connections between universities and business were facilitated by UNODC's Eastern Africa Regional Office and the Blue Company initiative, the partnership focus in Kenya was on student organizations via growing integrity clubs at participating universities and linking the students involved in clubs via their Ethics Ambassador Network rather than on placing students in private sector companies.

Finding 5: The number of 395 lecturers relates to the total number of people who received the training of trainer's (ToT) course. This number includes university lecturers, private sector staff (compliance staff and

<sup>35</sup> Data is from project reporting that has been triangulated with interviews.

managers) ethics ambassadors, and some students. The exact number of active university lecturers who are still delivering the course is estimated to be between 150-200. The survey received responses from 61 active university lecturers. The lecturers who responded to the survey estimated that between them they teach 6,000 students per academic year. 150 lecturers, therefore, could teach approximately 15,000 students per year. The total number of 38,000 students instructed via GIE is feasible and will only increase over time.

Finding 6. Survey data and interviews suggested the need to formalize GIE courses, including the allocation of credit hours and exams for students. Digital accessibility was another key area, with requests for the development of an online platform that includes multilingual support. There were also recommendations for updating materials with more practical, localized case studies, and for expanding the programme's scope to include more universities and even schools. There was also a need for continuous training, more engaging activities, and better dissemination of materials, preferably online. Interviews found that the inclusion of a research component, involving participating lecturers, could have further enhanced the project's credibility within academia. This would have facilitated the sharing of insights and best practices, contributing to a broader dissemination of the teaching materials and lessons to other universities and lecturers.

## EFFICIENCY

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**How well did the cluster adhere to established timelines and milestones, and what factors contributed to any deviations? What have been the facilitating or hindering factors in achievement of results?**

Finding 1. The desk review found that UNODC's anti-corruption projects were cost-efficient.<sup>36</sup> The scale of the effects and impacts of the project, given the level of funding, was extremely high. GIE spent USD 930,678 over 4 years in 3 countries, or USD 77,556 per country per year, of which 68% were for staff costs. BIM spent USD 791,728 over 4 years, or USD 197,932 per year, of which 59% were staff costs.<sup>37</sup>

Finding 2. The desk review found that GIE was effective in supporting the implementation of UNCAC<sup>38</sup> and that it was relatively efficient<sup>39</sup>, although it faced some challenges, such as UNODC bureaucracy and different reporting requirements. However, compared to other UNODC projects, GIE<sup>40</sup> is a success story and a potential source of learning. Most outputs were achieved<sup>41</sup> and many targets were exceeded. Some activities had to be altered in response to changing needs. Interviews found that the limited duration of the GIE project led to some unachieved outputs due to delays in partner decision-making processes, particularly concerning the adoption of new materials and curriculum changes within universities. Desk review and interviews found that GIE was effective and efficient in the exchange of good practices and information by transferring knowledge and know-how.<sup>42</sup> In the survey, 60% of GIE participants stated that UNODC's communication was very good, and 29% good.

Finding 3. The desk review indicated that subprogramme 2, output 3 of the country programme of Myanmar<sup>43</sup> related to anti-corruption activities in conjunction with the private sector. Interviews and the desk review noted that UNODC delivered a high level of activities in Myanmar<sup>44</sup>, for which beneficiaries were highly satisfied. Anti-corruption activities were noted as one of UNODC's main strengths. Survey data found that 17% of businesses that participated in BIM stated that UNODC's communication was very good, and 59% good. However, 24% replied that communication was only ok to poor. A previous evaluation noted UNODC lacked the capacity to initiate and build public-private sector partnerships effectively.<sup>45</sup> The desk

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<sup>36</sup> Final Independent Cluster Evaluation Report GLOX 30-32 18 FEB 2015.

<sup>37</sup> From UNODC annual financial reporting.

<sup>38</sup> UNODC In-depth mid-term evaluation of the Global Programme - GLOZ99 (June 2021).

<sup>39</sup> UNODC In-depth mid-term evaluation of the Global Programme - GLOZ99 (June 2021).

<sup>40</sup> UNODC In-depth cluster evaluation of Anti-corruption projects in Mexico (May 2023).

<sup>41</sup> Final Independent Cluster Evaluation Report GLOX 30-32 18 FEB 2015.

<sup>42</sup> UNODC In-depth cluster evaluation of Anti-corruption projects in Mexico (May 2023).

<sup>43</sup> Country Programme for Myanmar (2014-2017).

<sup>44</sup> Annex V to the Final Evaluation of the Regional Programme for SEAP\_ Annex V Myanmar:

<sup>45</sup> Final Independent Cluster Evaluation Report GLOX 30-32 18 FEB 2015.

review found that the requirement to manage multiple partnerships and demand driven activities, had stretched the managerial capacity of the UNODC offices.<sup>46</sup> Similar observations were made during interviews, which suggest that UNODC lacked the internal resources to manage complex and extensive projects and effectively coordinate with multiple stakeholders. It was felt that UNODC's coordination was better when it subcontracted or partnered with another organization.

Finding 4. Interviews confirmed that Myanmar was an extremely difficult environment in which to do business. There are trust issues, especially when dealing with government entities and the themes of transparency and human rights. UNODC was reported as having developed a very good product that was tailored toward the local populace and provided useful advice and support. However, culturally, online material is not as well received as in-person advice. It was suggested that to advance the subject fully, UNODC would need to hold small, in-person workshops, where participants could speak freely. Conversely, interviews also stated that to be more effective, BIM needs to include the government, as the legal implications of anti-corruption are the main driver for change.

Finding 5. Interviews found that UNODC has significant convening power. This enabled it to play a catalytic role in building the partnerships that enabled both projects. However, the small size of UNODC teams limited their capacity to deal with large numbers of stakeholders. Interviews found that the ability of beneficiaries to engage with UNODC and adapt to new practices differed. In Myanmar, private companies were able to adapt quickly, however, on the whole, they could not dedicate much time to training. COVID-19 perversely assisted. When meetings moved online, this enabled staff to dial into workshops, which limited the impact on their day jobs. For academia, which runs year-long courses, there was more of a delay in adapting courses, as the earliest an institution could change was the following academic year. In Mexico, private universities were able to receive and adapt UNODC material with relative ease, compared to public universities, due to their more protracted approval process.

## IMPACT

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What are the short-and long-term higher-level effects from the projects for academia and the private sector?

Finding 1: The potential impact of the BIM project was limited by the military coup, the climate of repression that followed, and the need to redesign the programme. This meant that key elements of the original BIM ToC, such as international networking and legal framework improvements, could not be realized. However, interviews suggested that implementing the project established a positive anti-corruption and integrity presence and provided a focal point for participating private sector companies at a time where no other types of activity or platforms existed. 22 companies and three CSOs directly benefited from UNODC's knowledge products, which they continue to use, reference, and signpost. Firms stated that they were required to fill in compliance forms from foreign customers, but did not understand why. Since participating in BIM, they not only have a greater understanding of anti-corruption, but also have suitable integrity and compliance processes. Interviews found that trade bodies in Myanmar do not have dedicated resources to provide direct assistance, and while they do arrange discussions, these events are broad brush and do not provide practical or scalable assistance. However, one CSO in Myanmar reported that it is directly mentoring 20 small firms because it has access to UNODC's products, which it uses as part of this assistance.

Finding 2: The surveys and interviews confirmed that GIE modules have been incorporated into many academic programmes of the participating universities and that some universities have created stand-alone courses based on the modules. Survey data found that the most important elements of the GIE project were the professional development opportunities it provided and the comprehensive approach to integrating ethical principles into education. The programme's collaborative nature, bringing together stakeholders from various sectors, including teachers, students, and community leaders, was also crucial in fostering a

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<sup>46</sup> UNODC In-depth cluster evaluation of Anti-corruption projects in Mexico (May 2023).

deeper understanding of integrity, transparency, and ethical conduct. The availability of specialized material and practical tools were instrumental in enhancing participants' ability to implement effective integrity education, making the overall experience valuable and enriching for students and professionals. One good practice highlighted during interviews was an ongoing integrity week where the modules were taught to all students in the university.

Finding 3: Interviews and the desk review suggested that the GIE project acted as a catalyst for anti-corruption action and mobilization beyond the scope of the project, but that there is insufficient data available to substantiate these claims.<sup>47</sup> Interviews and the desk review indicated that the GIE programme created new linkages between the participating universities and private sector companies, and that these had real benefits for all stakeholders. The participation of people from the private sector in content localization, in delivering guest lectures and in employing students as interns and ethics ambassadors improved the relevance of university teaching material and made the courses more attractive to students. Similarly, interviews with private sector representatives indicated that some companies were able to use the ethics ambassadors to improve integrity systems and training in their companies. Interviews also suggested that some of these linkages have continued beyond the timeframe of the project.

Finding 4: The GIE training resulted in some real improvements in the ability of students to reach appropriate solutions to ethical challenges; at least in the short-term. The data from the GIE impact assessment indicated that 72% of students reported a significant knowledge gain in ethics and integrity. This student self-assessment needs to be balanced by the results of pre- and post-training tests which show that although the proportion of students with a high ability to identify ethical solutions nearly doubled after the training, this still only represented 31% of all students. The proportion of students with a low ability to identify ethical solutions remained at around 50%, even after the training. The impact assessment identified various factors that could be incorporated into future programmes to improve the student understanding outcomes.

Finding 5: Interviews indicate that the ethics ambassador mechanisms developed the confidence, ethical understanding and ethical leadership capabilities of participating students. Interviews further indicated that the creation and support to Ethics Ambassador Networks further enhanced the effect and reach of integrity education, and that the enthusiasm and effort generated exceeded the expected results (at least in Kenya and Pakistan). This was reinforced by the international connections and exposure that leaders of the networks experienced, which was enabled by the shift to online engagement, which built commitment and leadership capacity at relatively low cost. Interviews indicate that various activities not contained in the original GIE project plan were generated, and that these enhanced its overall impact. These included the establishment or rejuvenation of integrity clubs (in Kenya), the innovative hackathon and various networking events for little or no additional cost.

Finding 6: This report was unable to verify whether a more indirect outcome of the GIE ToC logic – *‘that the ethics training supported by on-the-job training translates into more alumni developing ethical mindsets and became a driving force for cleaner business spreading ethical skills and awareness to other employees’* - . The demonstrated improvement in ethical understanding immediately after the training did not allow the evaluators to draw conclusions regarding whether such improvements translate into long-term improvements in the ethical understanding and behaviour of students. Nor does it allow us to draw conclusions about whether improved student understanding translates into positive organizational effects over time. It was obviously not possible to generate any data on these long-term effects given the projects' duration. We note that the academic literature on ethics programme impacts in general is also too scanty at this stage for us to draw any sound research-based inferences regarding long-term individual and organizational impacts. Future programmes of this nature could also incorporate a research component that would help generate additional data on these more indirect intended impacts.

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<sup>47</sup> UNODC In-depth cluster evaluation of Anti-corruption projects in Mexico (May 2023).

## SUSTAINABILITY

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

Finding 1: The BIM material remains relevant and accessible post the conclusion of the project. The BIM website is regularly used. A local firm now hosts this service pro bono, as without this website there would be no integrity tools for local companies to access. Interviews confirmed that CSOs continue to reference UNODC’s work and refer firms to this BIM website and that participating companies have adopted the material provided by UNODC and continue to access material from the website. Interviews further indicated that the BIM material will still be applicable and relevant for many years, particularly given the absence of other relevant material in Myanmar. 83% of BIM survey respondents stated that they would continue to use the material. 50% of respondents stated that the material would remain valid with updating, and 42% stated that it would remain valid for the next 5 years. This is confirmed by examining website use<sup>48</sup>:

Dates	Unique users of the website	Unique users of serious game	Files download
1 Jan - 11 Jul 24	553	52	17
1 Jan – 31 Dec 23	782	254	71
1 Jan – 31 Dec 22	227	89	20
Total	<b>1,562</b>	<b>395</b>	<b>108</b>

Table 8: Number of people accessing data from the BIM website

Finding 2: The adoption of GIE module material and teaching methods will endure for the foreseeable future. GIE achieved substantial academic integration with 14 universities adopting the UNODC modules on either a permanent or voluntary basis. 90% of lecturers responding to the survey stated that they would continue to use the GIE material. Approximately, 12,000 students will receive some level of teaching using GIE material in the 2024/2025 academic year. Interviews confirmed that the GIE modules have also been incorporated as approved curricula in many participating universities which will ensure their long-term relevance and sustainability.

Finding 3: The desktop review and interviews confirmed that GIE delivered sustainable impacts and had the potential to be improved, upscaled and replicated. This aligns with earlier evaluations that found that anti-corruption education outcomes were likely to continue and could even expand.<sup>49</sup> Such sustainability and the future ownership, however, depend on the resources required to sustain project activities.<sup>50</sup> Interviews suggested that sustained impact of the model would require local partners who could take on the coordination and management role. Interviewees suggested that identifying a local partner early in the process and handing over the coordination function during the delivery could have enhanced continuity and expansion.

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

To what extent did the project effectively promote human rights, gender equality and disability inclusion particularly regarding marginalized and vulnerable populations, ensuring that no one was left behind?

Finding 1. The desk review and interviews indicated that although neither project was designed with a specific gender dimension, the material on which the projects were based included some generic gender, human rights and diversity content. A recent UNDOC study indicates that all forms of education remain the

<sup>48</sup> BIM Website analytics provided by UNODC.

<sup>49</sup> Final Independent Cluster Evaluation Report GLOX 30-32 18 FEB 2015.

<sup>50</sup> UNODC In-depth mid-term evaluation of the Global Programme - GLOZ99 (June 2021).

best way to advance and fight corruption and gender equality.<sup>51</sup> A review of the GIE teaching modules indicated that apart from the module on ethics and diversity developed for Mexico, very little material dealt explicitly with issues related to gender equality and social inclusion. There was minimal mention of bullying, sexual harassment, sextortion, gender discrimination and gender-based violence despite their pervasiveness and strong correlation with other forms of corruption. Nor was there mention of integrity and corruption implications of inequality, exclusion and disability. There is considerable potential to highlight these issues much more directly in the future to include specific exercises and case material.

Finding 2. Interviews stated that the issue of human rights in Myanmar was difficult to address in public. One example provided was that of Ms. Bowman, who ran the Myanmar Centre for Responsible Business,<sup>52</sup> which was one of the project stakeholders. She was arrested for what were deemed political motives. Interviews indicated that more could have been done to consider businesses outside of Yangon and ultimately their dealings with the government. Interviews indicated that more closed-door meetings in Myanmar with a few participants would have enabled more meaningful discussion and sharing of experiences due to concerns about trust and confidentiality.

Finding 3: Survey data indicates that the overall percentage of male and female lecturers using the GIE material is 49% male and 48% female. There were differences between the countries, which correlated to findings from the desk review which noted similar patterns in the overall percentages of male and female students in university education for each country.<sup>53</sup>

Country		Male	Female
Kenya	Students	57%	43%
	Responses from lecturers surveyed	73%	28%
Mexico	Students	47%	53%
	Responses from lecturers surveyed	29%	68%
Pakistan	Students	53%	47%
	Responses from lecturers surveyed	62%	38%

Table 9: Male and female students at university and lecturers responding to the survey per country

Finding 4: Survey data indicated that 45% of GIE respondents felt UNODC material greatly helped them include content to advance gender equality and disability inclusion, 40% felt it had somewhat helped them. Survey data indicated that for BIM, 33% of respondents felt that UNODC products had greatly helped them and 42% felt it had somewhat helped them. Integrity education, human rights and gender equality education efforts are likely to be mutually reinforcing and synergies between the two can strengthen policy decisions.<sup>54</sup> As one respondent stated “the modules related to the role of integrity in the performance of professions and other topics such as inclusion and human rights. It was great material that made as if teachers from different countries were united in the same goal.”

Finding 5: The GIE training evaluations identified some gender effects, most notably that female students were generally more capable in identifying appropriate solutions to ethically challenging situations. This finding is corroborated by other research.<sup>55</sup> This gender effect could be incorporated into integrity initiatives with more explicit empowerment of women as a key improvement tool for the private sector. This is supported by a recent report which states that more should be done to ensure that gender is truly mainstreamed within the anti-corruption programming and technical assistance delivered by UNODC.<sup>56</sup>

<sup>51</sup> The time is now addressing the gender dimensions of corruption: UNODC 2020.

<sup>52</sup> <https://www.bbc.co.uk/news/world-asia-62764218#:~:text=The%20UK's%20former%20ambassador%20to,charged%20with%20breaching%20immigration%20laws.>

<sup>53</sup> <https://www.statista.com/>

<sup>54</sup> The time is now addressing the gender dimensions of corruption: UNODC 2020

<sup>55</sup> Gender and corruption in business. Breen, M., Gillanders, R., McNulty, G. and Suzuki, A., 2015.

<sup>56</sup> The time is now addressing the gender dimensions of corruption: UNODC 2020

### III. CONCLUSIONS

The cluster of projects was a highly relevant and strategically coordinated effort, executed with a large number of stakeholders. Both projects were delivered efficiently and effectively, with significant outcomes achieved at a relatively low cost. A substantial number of activities were delivered, and despite some delays, the projects were completed broadly on time, within budget and exceeded expectations.

The projects addressed critical shortfalls in an imaginative and effective manner, with the added advantage of a surge in online learning, a by-product of the COVID-19 pandemic. Impact is tangible and enduring, continuing to benefit stakeholders long after the conclusion of activities. If this were proof of concept, then the concept has been proven. However, despite success, there are valuable lessons to be learned for future initiatives, particularly regarding how similar projects could be enhanced.

The UNODC's approach of linking universities, private sector companies, and students through collaborative training events and internships produced significant results. This strategy resonated deeply with academic institutions, private sector partners, and students alike, creating a sustainable impact by integrating and expanding integrity and anti-corruption content within university curricula in a cost-effective way.

In Myanmar, despite significant contextual challenges such as the military coup, the project successfully raised private sector awareness and provided a focal point for ongoing discussions on business integrity. The resources developed by the project continue to be promoted by UNDP and local trade bodies, ensuring their accessibility and relevance beyond the project's lifespan.

Although GIE made a definable impact on the curricula of participating universities, feedback suggested that this could have been further enhanced by including a research component. Such an addition would have deepened the project's credibility within academia, facilitated the sharing of best practices, and contributed to a wider dissemination of teaching materials and lessons learned.

The localization of generic integrity and anti-corruption educational materials, including the incorporation of country-specific examples and regulatory frameworks, significantly improved the relevance and impact of both projects. This localization was a crucial element of the project's success.

The effective mobilization of students through the ethics ambassador mechanisms and the creation and support of these networks significantly amplified the reach and impact of the integrity education programmes. The enthusiasm and effort generated by these networks exceeded expectations and was further strengthened by the international connections and online exposure that students gained. This shift to online platforms not only built commitment and leadership capacity but did so at a relatively low cost.

Impact evaluations conducted before and after training sessions as part of GIE indicated a positive correlation between the training and improved teaching performance. However, these impact assessments, which focused on student understanding, could have been supplemented by additional research regarding the project's broader goal of enhancing the content and delivery of integrity teaching at universities through the provision of localized materials and training.

Both projects underscored the significant convening power and legitimacy of UNODC, which played a critical catalytic role in conceptualizing a powerful partnership model and mobilizing key actors from universities and the private sector. However, it should be noted that the small size of UNODC country teams may limit their capacity to scale up more extensive projects to their full potential. Future initiatives should involve identifying and mobilizing local entities with sufficient resources from the outset to sustain and upscale these efforts over time.

The limited duration of the GIE project meant that some potential outcomes could not be fully realized due to inevitable delays in partner decision-making processes. These included the initial lag between project commencement and staff recruitment, as well as the time required for universities to adopt new materials and approve updated curricula and courses. These factors should be considered in the planning of future projects to maximize their impact and effectiveness.

## IV. RECOMMENDATIONS

The Collective Action methodology that UNODC used in both projects was highly effective in leveraging support and delivering outcomes; that in many cases exceeded expectations. If these projects were proof of concepts, then the concepts work. The recommendations that follow should not be viewed, in the negative, i.e. things UNODC got wrong, but rather in the positive, how can UNODC build on the success and take the concept forward. Although the recommendations are directed toward UNODC's Corruption and Economic Crime Branch, they are generic and are applicable to any anti-corruption or integrity programme, at country, regional or global level.

### RECOMMENDATION 1 – PLANNING FOR AND RESOURCING SUSTAINABILITY AND POSSIBLE UPSCALING

UNODC's Corruption and Economic Crime Branch should ensure that future projects include a resource line for sustainment planning and implementation. Future education or business integrity type projects should plan, budget and resource more intentionally for sustainability.

Based on findings 2 (Effectiveness), 1 (Impact) and 1 and 2 (Sustainability)

### RECOMMENDATION 2 – IDENTIFYING A LONG-TERM DELIVERY AGENT

UNODC's Corruption and Economic Crime Branch should identify an appropriate long-term delivery agent in the initial stages of any future similar project. Future projects of this nature have the potential to be sustained by local actors. UNODC has significant convening power and legitimacy that enable it to play an initial catalytic role, but it lacks the internal resources to manage the complexity involved in scaling these initiatives to their full potential and sustaining them over time. This requires an appropriate local entity with sufficient resources and connectivity to local stakeholders. This role could potentially have been played by one of the participating universities, an industry association, a CSO or professional body focused on promoting integrity within the private sector, or a combination of all three.

Based on findings 2,3,4 (Coherence) and 3 (Impact)

### RECOMMENDATION 3 – UPSCALING EDUCATION AND BUSINESS INTEGRITY PRACTICES REQUIRES THE ONE UN APPROACH

UNODC's Corruption and Economic Crime Branch, when planning to implement future projects that seek to deliver mass effect, in education or across the private sector, should seek to involve other UN agencies or multilateral partners with more resources and greater private sector partnership management capacity. Where UNODC lacks in-country resources to upscale a project itself, then it should partner with another UN entity. Anti-corruption and integrity work aims to deliver societal change, which requires engagement with youth, school, academia, business, and the government, and should be an integral element of any UNSDCF. Integrating the integrity education partnership work within the broader UN community as part of an UNSDCF would also strengthen UNODC's reach and visibility. The success potential of partnership projects of this nature is positively correlated to the extent to which the UN country office has strong existing relationships and networks with the private sector and universities. Government agencies responsible for combating corruption or setting norms regarding university education also have the authority and resources to facilitate the upscaling and mainstreaming of ethics and anti-corruption education at the tertiary (and secondary school) level and should be actively engaged where appropriate.

Based on findings 2 (Coherence), 4 and 5 (Efficiency) and 2 (impact)



## **RECOMMENDATION 4 – DEVELOPING EVIDENCE-BASED LOGIC ON LONG-TERM ORGANISATIONAL OUTCOMES OF INTEGRITY EDUCATION INTERVENTIONS**

UNODC's Corruption and Economic Crime Branch should ensure that future projects develop a stronger evidence-based logic regarding the long-term impacts of ethical education for students and the integrity performance of private sector organizations that employ them. The useful pre- and post-training impact evaluations that measured the effect of the training on student understanding and practice that were built into GIE need to be reinforced. This should include additional research work regarding whether the increased ethical awareness and understanding immediately after the teaching translates into ongoing improvements in integrity understanding and practice at both individual student and company level. The value of these assessments could also be supplemented by mechanisms to assess the extent to which the provision of material and training improved the content and the delivery of integrity teaching at participating universities - a core objective of GIE.

Based on findings 6 (Impact)

## **RECOMMENDATION 5 – REALISTIC TIMEFRAMES THAT ADDRESS INEVITABLE DECISION-MAKING LAGS IN PARTNERSHIP-INTENSE PROJECTS**

UNODC's Corruption and Economic Crime Branch should ensure that future projects are based on realistic timeframes that accommodate the inevitable and typically uncertain lags in partner decision-making processes. In addition to the anticipated set-up lag between the project start and the hiring of new staff to deliver the activities, the project had to accommodate the decision-making time universities required to adopt new material and to get new curricula and courses approved. Private universities seem to be able to adapt their curricula faster than public universities. Similarly, the private sector, while it can make decisions regarding participating and adopting material quickly, prefers to manage its participation in an incremental and 'bite-sized' manner that accommodates its commercial demands.

Based on findings 6 (Efficiency) and 6 (Impact)

## **RECOMMENDATION 6 – INCORPORATING A RESEARCH COMPONENT IN PROJECTS INVOLVING PARTNERING WITH ACADEMIA**

UNODC's Corruption and Economic Crime Branch should include resources for university-based research that supports GIE. Such a research component would strengthen the credibility of the programme in academia and produce new knowledge regarding ethics, integrity and anti-corruption action for the private sector which will translate into improved teaching over time.

Based on findings 5 (Effectiveness)

# V. LESSONS LEARNED AND GOOD PRACTICES

## LESSONS LEARNED

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### LESSON 1 – PLAN AND RESOURCE FOR SUSTAINABILITY

Projects aiming for long-term impact, especially those focused on education and integrity practices, must have clear strategies and resources allocated from the outset to ensure their sustainability.

### LESSON 2 – SYSTEMATIC MONITORING

Developing robust evidence-based frameworks that measure the impact of educational interventions on integrity is advised. Pre- and post-training assessments should be built into all future projects.

### LESSON 3 – ESTABLISH REALISTIC TIMELINES AND CONDITIONS

Projects involving multiple stakeholders must account for differing or slower decision-making processes. Public universities and private businesses require time to adjust curricula and business practices.

### LESSON 4 – INCLUDE A RESEARCH COMPONENT

When partnering with academic institutions, including a research component, strengthens academic commitment and project relevance and contributes to the broader knowledge base on integrity and ethics.

## GOOD PRACTICES

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### GOOD PRACTICE 1 – GIE PARTNERSHIP MODEL

The GIE partnership model, which linked universities, private sector companies, and students through a programme of collaborative university-based training and the deployment of students as ethics ambassadors, served as a strong example of an effective integrity intervention. This model should be considered for incorporation into future programmes where feasible and appropriate.

### GOOD PRACTICE 2 – ENABLING PARTICIPANT NETWORKS

Building vibrant student networks significantly enhanced the impact and sustainability of GIE. They also helped to sustain the commitment of students and encouraged ongoing accountability when students join employment. The use of virtual tools enabled international connections and provided country networks leaders with exposure and leadership development at a relatively low cost.

### GOOD PRACTICE 3 – MATERIAL LOCALIZATION

Localizing globally framed educational materials greatly improved their relevance and impact within specific countries. In the GIE programme, the investment in developing educational materials from the E4J initiative was effectively leveraged to create localized modules that included country-specific examples and regulatory frameworks. This was achieved by a working group comprising international experts, local academics, and private sector representatives, who collaboratively prioritized and customized key curriculum content for the private sector context in each participating country.

### GOOD PRACTICE 4 – ASSESSMENTS OF TEACHING IMPACT ON STUDENT COMPREHENSION

Future integrity education projects should include pre- and post-training impact evaluations to measure the effect of the training on student understanding and practice, as was done in the GIE programme. Such assessments are correlated with improved teaching performance and provided valuable evidence of the training's impact and student comprehension.

CLUSTER INDEPENDENT PROJECT  
EVALUATION  
TERMS OF REFERENCE

FINAL INDEPENDENT PROJECT  
EVALUATION

OF

(PROJECT: UNODC GLOBAL INTEGRITY EDUCATION)

GLOZ99 (SEGMENT)

AND

MYANMAR SUB-PROGRAMME 2: ANTI-CORRUPTION (PROJECT:  
STRENGTHENING THE INTEGRITY AND ANTI-CORRUPTION EFFORTS  
OF THE PRIVATE SECTOR IN MYANMAR) MMRZ36



UNITED NATIONS

Vienna, 2024

## I. BACKGROUND AND CONTEXT

Project number:	GLOZ99	MMRZ36
Project duration (dd/mm/yyyy-dd/mm/yyyy):	October 2019 – September 2023	October 2019 – September 2023
Location (Country/ies and sub-national focus areas, if relevant):	Global, with a focus on Kenya, Mexico and Pakistan	Myanmar
Linkages to Country, Regional and Thematic Programmes & UNODC Strategy 2021-2025:	The United Nations Convention against Corruption (UNCAC) UNODC Strategy 2021-2025: Thematic Area 3: Preventing and Countering Corruption and Economic Crime	The United Nations Convention against Corruption (UNCAC) UNODC Strategy 2021-2025: Thematic Area 3: Preventing and Countering Corruption and Economic Crime Myanmar Country Programme (2014-2022)
Linkages to the SDG targets to which the project contributes:	SDG 16: Peace, Justice and Strong Institutions SDG 17: Partnerships for the goals	
	SDG 4: Quality education	SDG 10: Reduced inequalities SDG 8: Decent work and economic growth
Executing Agency (UNODC office/section/unit):	Thematic Support Section (TSS)/Corruption and Economic Crime Branch (CEB)/Division for Treaty Affairs (DTA)	Myanmar Programme Office and Thematic Support Section (TSS)/Corruption and Economic Crime Branch (CEB)/Division for Treaty Affairs (DTA)
Partner Organizations:	-	-
Funder(s):	Siemens Integrity Initiative	
End Beneficiaries/Recipients:	Students and lecturers at the tertiary level (university) and various practitioners in the private sector as well as companies on an organizational level.	Practitioners in the private sector and in civil society organizations, public officials
Total Approved Budget (USD):	USD 1,000,000	USD 800,000
Total Overall Budget (USD):	USD 1,000,000	USD 800,000
Total Expenditure by date of initiation of evaluation (USD):	USD 930,678	USD 791,728

Name and title of Project/Programme Manager(s) and implementing UNODC office(s)/section(s)/unit(s):	Global Programme to Prevent and Combat Corruption through Effective Implementation of the United Nations Convention against Corruption in support of Sustainable Development Goal 16: UNODC Global Integrity Education/Brigitte Strobel-Shaw, Florian Lair/Corruption and Economic Crime Branch/Thematic Support Section/Private Sector	Sub-Programme 2: Anti-Corruption (Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar) / Marie Pegie Cauchois, Seint Sandar Hlaing/UNODC Myanmar/Anti-Corruption Programme
Time frame of evaluation: (planned start and end date of the evaluation process)	May – September 2024	
Budget for this evaluation in USD <sup>57</sup> :	USD 45,000	
Number of independent evaluators planned for this evaluation <sup>58</sup> :	Two	
Type and year of past evaluations (if any):	In-depth cluster evaluation of Anti-corruption projects in Mexico (May 2023)  In-Depth mid-term evaluation of the Global Programme - GLOZ99 (June 2021)	-

## II. PROJECT OVERVIEW

The project, “UNODC Global Integrity Education”, that is administratively part of the Global programme to prevent and combat corruption through effective implementation of the United Nations Convention against Corruption in support of Sustainable Development Goal 16 (GLOZ99), was developed to promote effective integrity education in and for the private sector in countries that face significant corruption challenges despite being UNCAC parties and having anti-corruption laws and institutions. While a major mechanism for such transformation towards business integrity is education, integrity education is however often limited to the public sector while the private sector contributes to around 90% of most countries’ GDP.

In this regard, the main objective of the project was the promotion of effective integrity education for the private sector by focusing broadly on university graduates. A UNODC 2017 study identified a growing demand for professional ethics training outside academia and found that new recruits underestimated the importance of integrity in the workplace.

Under the Education for Justice initiative, UNODC developed university integrity modules that addressed core issues such as ethical leadership, strategies for ethical actions, corruption and human rights, gender diversity, and integrity in media, business and law with assistance from over 70 professors from around the world, bringing on board diverse local contexts. While other anti-corruption education initiatives primarily targeted

<sup>57</sup> Including fees for evaluation team, travel, printing, editing, translation, interpretation, etc.

<sup>58</sup> 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.

business students or anti-corruption practitioners, the UNODC modules were designed for undergraduate and graduate students in all disciplines additionally helping students develop skills such as communication, teamwork, creativity, critical thinking, and problem-solving through value-driven action, ultimately boosting their employability skills in the market.

The project bridges between academia and business, continuing to engage students after graduation, involving them in adapting the modules to on-the-job training programmes and empowering them to serve as ethics ambassadors at work, thereby achieving sustainable change in the private sector.

The project was implemented in Pakistan, Kenya and Mexico, countries that face significant integrity challenges that are compounded by high urbanization rates and rapidly growing populations. Activities across three continents would inform a global audience of educators and practitioners connected through UNODC's worldwide networks and will help generate cross-regional insights of what can work globally.

The project, "Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar", that is administratively part of the Sub-Programme 2: Anti-Corruption (MMRZ36) of the UNODC Programme Office Myanmar, was developed at a time when Myanmar had then recently adopted the 4th Amendment to the Anti-Corruption Law (2013), and which further increased the powers and duties of the Anti-Corruption Commission (ACC) to then issue guidance to companies to prevent corruption internally and take investigative action without having to rely on complaints. Despite progress, the UNCAC Review Mechanism review of Myanmar (2016) highlighted significant legislative and regulatory gaps regarding the liability of legal persons, cooperation between public and private sector, whistle-blower protection and corruption in the private sector, noting for instance that there was no provision for active bribery in the private sector. The 4th Amendment had not addressed these legal gaps.

The lifting of sanctions and the opening of Myanmar led to an influx of foreign direct investment, but an improvement in business ethics and corporate integrity in the private sector was crucial for the inflows to maintain this stability. With lack of transparency in business processes, corruption and a weak rule of law hindered economic development, and Myanmar's poor ranking in the World Bank's Ease of Doing Business Index impacted its reputation as a favourable place for business. Business integrity was of low priority for private companies, and they were yet to adopt codes of conduct or guidelines on business integrity, hence corruption risks were widespread. Public-private dialogue and collaboration on strengthening business integrity were only in their early stages, and bribery was seen as part of the culture.

In order to address the defined gaps, the project sought to promote the adoption of legislation in line with the recommendations from the UNCAC Review, the development and adoption of codes and guidelines in the private sector, and the development of a culture of integrity in businesses in Myanmar. Through 3 main overarching objectives, the project sought to reduce opportunities for corruption and to create a culture of integrity by enhancing public-private dialogue and improving legal frameworks.

Myanmar's corporate sector made significant progress in combating corruption through dialogue with public entities and civil society organizations. However, challenges persist, especially following the military takeover in 2021. The project was then redesigned to align with UN engagement principles and assist the private sector and civil society organizations in strengthening business integrity.

The two projects described above will undergo a clustered evaluation based on various rationales. Both projects are under the same funding round of the Siemens Integrity Initiative. Following the COVID-19 pandemic, both projects also got a no-cost extension from the initial September 2022 implementation deadline to September 2023.

In the implementation of the projects, UNODC has used similar methods including replication of outcomes and material, leading to several synergies between the two projects. For instance, the anti-corruption training modules for companies that were developed under UNODC Global Integrity Education were later used to develop similar content in Myanmar, while the serious game developed in Myanmar is now being adapted for Pakistan. There has also been the use of lessons learned to inspire and steer outputs across project countries and improve delivery of technical assistance.

A clustered evaluation will also benefit from optimization of the shared resources in the undertaking of the evaluation, as well as facilitate the identification of potential synergies between the projects, enabling the organization to leverage these synergies for improved performance and efficiency in future implementation. Additionally, the evaluation will enable a holistic impact assessment from these interrelated projects.

Project Code	Objective
Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar (MMRZ36)	<p><b><u>Objective 1</u></b> To strengthen the incentives for corporate integrity and cooperation through enhancement of dialogue and regional and international exchange between Myanmar private sector, ASEAN regional platform and Working Group on Business integrity.</p> <p><b><u>Objective 2</u></b> To improve anti-corruption frameworks in line with UNCAC.</p> <p><b><u>Objective 3</u></b> To build capacity in the Myanmar private sector to develop new integrity tools.</p>
UNODC Global Integrity Education (GIE)	<p><b><u>Objective 1</u></b> Create and implement university integrity modules and empower lecturers to teach the modules.</p> <p><b><u>Objective 2</u></b> Establish ethics training programmes and networks of “ethics ambassadors” in the private sector.</p> <p><b><u>Objective 3</u></b> Bring together academia and business to promote integrity in the private sector.</p>

### III. PURPOSE AND SCOPE OF THE EVALUATION

Planned utilisation of the evaluation results <sup>59</sup> :	Funderreporting, assessing impact of the interventions as well as informing the future development of the project or similar projects
Main users of the evaluation results <sup>60</sup> :	Funders, UNODC senior management, beneficiaries, key stakeholders and programme management
Unit of analysis (full projects/segment/etc.)	Full projects
Time period covered by the evaluation:	October 2019 – September 2023
Geographical coverage of the evaluation:	Kenya, Mexico, Pakistan and Myanmar

<sup>59</sup> 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.

<sup>60</sup> e.g., senior management, programme management, stakeholders, beneficiaries, funders etc.

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 criteria<sup>61</sup>. All evaluations must include gender, human rights, disability inclusion and no one left behind. Ideally these are mainstreamed within the evaluation questions. Moreover, the evaluation needs to identify lessons learned<sup>62</sup> and good practices. The evaluation questions will be further refined by the Evaluation Team in the drafting of the Inception Report.

Criteria	Evaluation question
Relevance <sup>63</sup> : Is the intervention doing the right thing?	To what extent are the outcomes, outputs, and activities of the cluster relevant to the creation of fair and clean market conditions?
Coherence <sup>64</sup> : How well does the intervention fit?	To what extent has the cluster delivered results in line with organisational, regional and international priorities vis-à-vis the Sustainable Development Goals?
Efficiency <sup>65</sup> : How well are resources being used?	To what extent did the projects adhere to established timelines and milestones, and what factors contributed to any deviations?
Effectiveness: Is the intervention achieving its objectives? <sup>66</sup>	To what extent did the cluster achieve intended outcomes and objective? What have been the facilitating or hindering factors in achievement of results?
Impact <sup>67</sup> : What difference does the intervention make?	What are the short-and long-term higher-level effects from the projects for academia and the private sector?

<sup>61</sup> <https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm>

<sup>62</sup> Lessons learned concern the learning experiences and insights that were gained throughout the project/ programme.

<sup>63</sup> Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient, and funder.

<sup>64</sup> The compatibility of the intervention with other interventions in the country, sector, or institution

<sup>65</sup> The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way.

<sup>66</sup> The extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.

<sup>67</sup> The extent to which the intervention has generated or is expected to generate significant positive or negative, intended, or unintended, higher-level effects. **Please note that impact can be difficult to measure for smaller projects, specifically ones with short timeframes.**



Criteria	Evaluation question
Sustainability <sup>68</sup> : Will the benefits last?	To what extent are the benefits of the cluster likely to continue after it ends?
Human rights, gender equality, disability inclusion and leaving no one behind <sup>69</sup> : Has the intervention been inclusive and human rights based?	To what extent did the project effectively promote human rights, gender equality and disability inclusion particularly regarding marginalized and vulnerable populations, ensuring that no one was left behind?

## 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 marginalised groups, such as people with disabilities are heard (including gender related and disaggregated data, (e.g., by age, sex, countries etc.); (ii) ensuring an **unbiased and objective approach and the triangulation of sources, methods, data, and theories**. The limitations to the evaluation need to be identified and discussed by the evaluation team in the Inception Report, e.g., data constraints (such as missing baseline and monitoring data). Potential limitations as well as the chosen mitigating measures should be included. The evaluation team will be asked to present a dedicated methodology in the Inception Report outlining the evaluation criteria, indicators, sources of information and methods of data collection. The evaluation methodology must conform to the United Nations Evaluation Group (UNEG) Norms and Standards as well as the UNODC Evaluation Policy, guidance, tools, and templates. The evaluation team is also expected to use interviews, surveys and/or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation. While maintaining independence, the evaluation will be carried out based on a participatory approach, which seeks the views and assessments of all parties identified as the stakeholders of the project/ programme.

The evaluation should extract findings, lessons learned and recommendations relevant to the overall geographic, thematic or other identified cluster subject. Please note that this is not an individual evaluation of each of the projects under the cluster.

<sup>68</sup> The extent to which the net benefits of the intervention continue or are likely to continue.

<sup>69</sup> 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.

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 <sup>70</sup> (dd/mm/yy)	End date (dd/mm/yy)	Subsumed tasks, roles	Guidance / Process description
Finalisation ToR (2-4 weeks)	06/02/2024	08/04/2024	Initiate the evaluation in Unite Evaluation and upload ToRs; finalise draft ToR based on IES feedback; IES shares final draft with CLPs; PM to finalise ToR based on CLPs feedback.	Includes 1 week review by IES and 1 week review by CLPs; multiple revisions by PM based on IES and CLPs feedback; final clearance by IES; in parallel, outreach by PM to qualified evaluators (consultation with IES on potential candidates)
Recruitment (3-4 weeks)	15/04/2024	10/05/2024	Consult with IES on potential evaluators; PM manages full recruitment process <sup>71</sup>	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 (3 weeks)	13/05/2024	07/06/2024	Kick-off meeting with PM and evaluators; desk review by evaluators, followed by draft Inception Report; Review by IES; clearance of revised Final Inception Report by IES	Includes 1 week review and clearance by IES; IES may participate in the kick-off meeting
Data collection (incl. field missions) (3-5 weeks) <sup>72</sup>	10/06/2024	05/07/2024	Potential field missions; observation; interviews; etc. by evaluators	Coordination of data collection dates and logistics by PM.
Analysis and draft report (3-4 weeks)	08/07/2024	02/08/2024	Data analysis and drafting of report by evaluators	Includes 1 week review by IES, followed by 1 week review by PM
	05/08/2024	16/08/2024	Review by IES; review by PM; revision of draft report by evaluators	

<sup>70</sup> 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.

<sup>71</sup> Please follow the official recruitment process for international, regional, or national consultants at UNODC.

<sup>72</sup> 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.

Evaluation stage	Start date <sup>70</sup> (dd/mm/yy)	End date (dd/mm/yy)	Subsumed tasks, roles	Guidance / Process description
Draft report for CLP comments (1 week)	16/08/2024	23/08/2024	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)	26/08/2024	06/09/2024	Revision by evaluators; Evaluation report, 2-page Evaluation Brief and PowerPoint slides are finalised by evaluators based upon feedback by IES and PM; external quality assessment of report; completion of MR and EFP by PM	Includes 1 week review and clearance by IES of Final Report and Brief and 1 week review by PM of Brief and PowerPoint slides; 1 week for external quality assessment facilitated by IES
Presentation (1 day)	09/09/2024	12/09/2024	Presentation organised by PM.	Date of presentation of final results to be agreed between PM and evaluators; IES to be invited.

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

## VII. EVALUATION TEAM COMPOSITION

Role	Number of consultants <sup>73</sup> (national/international)	Specific expertise required <sup>74</sup>
Evaluation Expert	1 (international/national consultant)	Expertise in Evaluation methodology
Substantive Expert	1 (international/national consultant)	Expertise in Crime Prevention and Criminal Justice, with a focus on Anti-corruption

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.

<sup>73</sup> Please note that an evaluation team needs to consist of at least 1 independent evaluator – the Evaluation Expert – and ideally one Substantive Expert.

<sup>74</sup> 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.

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)<sup>75</sup>. 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 finalising	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	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 organisational rules and regulations for consultants)		
	Finalise the compilation of the desk review material		
Inception Report	Engage with the evaluation team and provide all required information, documents, stakeholder lists, schedule kick-off meeting etc.	Attend kick-off meeting as necessary, and provide relevant templates and guidance, review draft Inception Report in line with UNODC and UNEG norms and standards	Participate in kick-off meeting  Draft Inception Report in line with UNODC templates and guidelines <sup>76</sup>

<sup>75</sup> The Unite Evaluations user manual for Project Managers is available here.

<sup>76</sup> <https://www.unodc.org/unodc/en/evaluation/normative-tools.html>

Evaluation stage	Project Manager	IES	Evaluation team
Data collection and analysis	Release payment once requested by IES	Clear Final Inception Report before any data collection can start	Provide Final Inception Report
	All logistical arrangements for the evaluators (including travel arrangements, set-up of interviews as requested, note verbales, etc.).	Provide guidance on the evaluation process to the evaluation team and/or the project team, as needed.	Conduct an independent, participatory and high-quality data collection.
	Timely travel arrangements, payments of DSAs, etc.		Implement the methods and tools developed in the Inception Report.
	Participate in de-briefings, as necessary		Engage with Project Management to request further information and assistance as required. Conduct de-briefings to PM, as necessary
	Provide further data, documents, stakeholders, etc. as requested by the evaluation team.		Conduct a thorough analysis to ensure triangulation of evidence.
Draft report	Provide further information to evaluators as requested		Provide a high-quality draft report, in line with UNODC and UNEG N&S
	1 review of the draft report for factual errors, once cleared by IES	Review of the draft report	Incorporate comments of IES and consider those of PM
	Release payment, once cleared by IES	Initial clearance or rejection of draft report	
		Share draft report with CLPs (1 week)	Incorporate comments of CLPs.
Final report, Brief and Presentation	Complete Management Response and Evaluation Follow-up Plan	Facilitation of external quality assessment of the report.	Based on the external assessment, finalise the report, 2-page Evaluation Brief and PowerPoint slides.
	Review the 2-page Evaluation Brief and PowerPoint slides and organize an MS Teams presentation of the results to internal and external stakeholders	Final review by IES and either 1) clearance for publication or 2) non-clearance for publication if it does not meet UNODC & UNEG norms and standards IES to attend final presentation as necessary	Present the results as agreed with Project Management and as cleared by IES within 4 weeks of approval of the final evaluation report.
	Release all outstanding payments, as requested by IES	Clear all deliverables for payment, once they meet UNEG	

Evaluation stage	Project Manager	IES	Evaluation team
Follow-up	In case the report is not cleared by IES, use it exclusively for internal reporting (NOT for dissemination)	Norms and Standards and UNODC evaluation policy, templates and guidelines.	
	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 <sup>77</sup>	Indicators/sub- questions <sup>78</sup>	Data collection method(s) and triangulation <sup>79</sup>	Sources of information
To what extent did the cluster respond to identified shortfalls in a coherent manner?	To what extent were cluster activities relevant to the creation of fair and clean market conditions?	Document/literature review  Interviews	Project documents and reporting  And online reports from WB and TI  UNODC Staff, CSOs, Private Sector
	To what extent has the cluster delivered results in line with organisational, regional and international priorities vis-à-vis the Sustainable Development Goals?	Document/literature review	Project documents and reporting  And online reports from WB and TI
	What were the contextual factors relating to the different rights holders? Were activities for different rights holders envisaged and or designed?	Document/literature review  Interviews	Project documents and reporting online reports from WB and TI  UNODC Staff, CSOs, Private Sector
	How did the cluster co-ordinate activity with other human rights and gender equality actors?	Document/literature review  Interviews	Project documents and reporting  UNODC Staff, CSOs, Private Sector
To what extent was the cluster delivered compared the intervention logic?	To what extent did the intervention achieve intended outcomes and objective?	Document/literature review  Interviews  Survey and group interviews	Project documents and reporting  UNODC Staff and Private Sector  Lecturers and Ethics Ambassadors
	How well did the cluster adhere to established timelines and milestones, and what factors contributed to any deviations?	Document/literature review  Interviews	Project documents and reporting  UNODC Staff  Funder
	What have been the facilitating or hindering factors in achievement of results?	Interviews	Project documents and reporting  UNODC Staff and Funder

<sup>77</sup> Please include all evaluation questions in the evaluation matrix.

<sup>78</sup> Please state the sub-questions and indicators that will guide your data collection to respond to the evaluation question.

<sup>79</sup> Please state the data collection and triangulation methods that will be used to answer the respective evaluation question and the respective data sources.

	Were there any competing demands of rights holders and how were resources allocated to achieve inclusive, equitable and gender transformative results?	Interviews Survey and group interviews	UNODC Staff, CSOs, Private Sector  Lecturers and Ethics Ambassadors
What was the impact of the cluster and are these gains sustainable?	What are the short-and long-term higher-level effects from the projects for academia and the private sector?	Interviews Survey and group interviews	UNODC Staff, CSOs, Private Sector  Lecturers and Ethics Ambassadors
	What benefits from the cluster have continued after it ended? Year 1	Interviews Survey and group interviews	UNODC Staff, CSOs, Private Sector  Lecturers and Ethics Ambassadors
	Will the products produced by the projects be applicable and in use in 5 years' time?	Interviews Survey and group interviews	UNODC Staff, CSOs, Private Sector  Lecturers and Ethics Ambassadors
	Is the impact of the cluster uniform or does it differ depending on social differences? Did the cluster contribute to an enabling environment for a continuous realisation of human rights, gender equality and the inclusion of marginalised groups?	Interviews Survey and group interviews	UNODC Staff, CSOs, Private Sector  Lecturers and Ethics Ambassadors
What could or should be done if UNODC were planning a similar intervention?	What lessons can be learnt from the design and delivery of this intervention?	Interviews Survey and group interviews Document/literature review	UNODC Staff, CSOs, Private Sector  Lecturers  Project reporting and evaluations
	How did the cluster accommodate the needs of all rights holders and are there lessons to be carried forward?	Interviews Survey and group interviews	UNODC Staff, CSOs, Private Sector  Lecturers and Ethics Ambassadors



# 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 “Work on Strengthening Integrity and Anti-Corruption” Cluster of Projects. The evaluation is undertaken in line with UNODC and UNEG norms and standards for evaluation.

The purpose of the evaluation is to explore if the cluster responded to identified shortfalls in a coherent manner. If its activities were delivered on time and within budget. And if the impact of the cluster is meaningful and will endure. Should UNODC plan a similar intervention, are there any lessons that can be taken forward.

The evaluation is carried out by a team of external independent evaluators, consisting of an Evaluation Expert (Mr Angus Henderson) and a Substantive Expert (Mr David Schmidt).

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:

Questions	GLOZ93	MMRZ36
Did the cluster respond to identified shortfalls in a coherent manner?		
Can you explain how UNODC’s project supports the creation of fair and clean market conditions?	X	X
What contextual factors relating to the different rights holders were considered in the design of the cluster?	X	X
Did the cluster co-ordinate its activities with CSO, NGOs and UN Agencies? How and when did this occur?	X	X
How well was the cluster delivered compared the intervention logic?		
To what extent did the cluster deliver on time and budget, and what factors contributed to any deviations?	X	X
Were there any competing demands relating to different rights holders and how were resources allocated to achieve inclusive, equitable and gender transformative results?	X	X
In your own words can you describe the effects of the project on academia?	X	
In your own words can you describe the effects of the project on the private sector?		X
What was the impact of the cluster and are these gains sustainable?		
In your own words what do you see as the impact of this project, now?	X	X
In your opinion will the project’s products be useful in 5 years’ time?	X	X

Is the impact of the intervention uniform or does it differ depending for different target audience?	X	X
What should be done if UNODC were planning a similar intervention?		
What lessons can be learnt from the delivery of this project?	X	X

## INTERVIEW QUESTIONS FOR FUNDERS:

Questions
Did the cluster respond to identified shortfalls in a coherent manner?
To what extent did the cluster deliver results in line you're your organisational priorities?
Did the cluster assist in the creation of fair and clean market conditions?
Was there anybody or an organisation that you believe UNODC should have worked with?
How well was the cluster delivered compared the intervention logic?
How efficient and effective were UNODC's administrative processes (financial, reporting etc)?
Regarding the project did you see any competing demands relating to different rights holders, that potentially blocked equitable and gender transformative results?
What was the impact of the cluster and are these gains sustainable?
In your own words can you describe the effects of the project?
In your opinion will the project's products be useful in 5 years' time?
What should be done if UNODC were planning a similar intervention?
With the ability of hindsight can you identify anything that UNODC can learn from the delivery of these projects?

## INTERVIEW QUESTIONS FOR CSOS AND TRADE BODIES

Questions	GLOZ99	MMRZ36
Did the cluster respond to identified shortfalls in a coherent manner?		
Are there any synergies with what UNODC's project tried to deliver and your organisational priorities?	X	X
Can interventions such as UNODC's project assist in the creation of fair and clean market conditions?	X	X
In your opinion how well did UNODC manage partnerships?	X	X
How important is it to understand the varying contextual factors relating to the different rights holders?	X	X
How well was the cluster delivered compared to the intervention logic?		
In your opinion how did UNODC's work strengthen the incentives for corporate integrity and cooperation through enhancement of dialogue and regional and international exchange between Myanmar private sector?		X
In your opinion how did UNODC's work improve anti-corruption frameworks in line with UNCAC?		X
In your opinion how did UNODC's work build capacity in the Myanmar private sector to develop new integrity tools?		X

In your opinion how did UNODC’s work create and implement university integrity modules and empower lecturers to teach these modules?	X	
In your opinion how did UNODC’s work establish ethics training programmes and networks of ethics ambassadors?	X	
In your opinion how did UNODC’s work bring together academia and business to promote integrity in the private sector?	X	
When considering anti-corruption activities have you identified any competing demands relating to different rights holders?	X	X
What was the impact of the cluster and are these gains sustainable?		
In your own words can you describe the effects of the cluster?	X	X
In your opinion will the project’s products be useful in 5 years’ time?	X	X
What should be done if UNODC were planning a similar intervention?		
With the ability of hindsight can you identify anything that UNODC could learn from the delivery of this project?	X	X

## INTERVIEW QUESTIONS FOR PRIVATE SECTOR BENEFICIARIES:

Questions	GLOZ99	MMRZ36
Did the cluster respond to identified shortfalls in a coherent manner?		
Are there any synergies with what UNODC’s project tried to deliver and your organisational priorities?	X	X
Can interventions such as UNODC’s project assist in the creation of fair and clean market conditions?	X	X
In your opinion how well did UNODC manage partnerships?	X	X
How important is it to understand the varying contextual factors relating to the different rights holders?	X	X
How well was the cluster delivered compared to the intervention logic?		
In your opinion how did UNODC’s work strengthen the incentives for corporate integrity and cooperation through enhancement of dialogue and international exchange between Myanmar’s private sector?		X
In your opinion how did UNODC’s work improve anti-corruption frameworks in line with UNCAC?		X
In your opinion how did UNODC’s work build capacity in the private sector. Did it assist in developing new integrity tools?		X
In your opinion how did UNODC’s work create and implement university integrity modules and empower lecturers to teach the modules filtered in the private sector?	X	
In your opinion how did UNODC’s work establish ethics training programmes and networks of “ethics ambassadors” in the private sector?	X	
In your opinion how did UNODC’s work bring together academia and business to promote integrity in the private sector?	X	
Are there any competing demands relating to different rights holders?	X	X
What was the impact of the cluster and are these gains sustainable?		

In your own words can you describe the effects of the project on the private sector?	X	X
In your opinion will the project's products be useful in 5 years' time?	X	X
What should be done if UNODC were planning a similar intervention?		
With the ability of hindsight can you identify anything that UNODC can learn from the delivery of this cluster?	X	X

## ONLINE SURVEY/QUESTIONNAIRE: LECTURERS

The following survey will be sent out to the lecturers in Kenya, Mexico and Pakistan who participated in the UNODC GIE project by using the Anti-corruption and Integrity and Ethics module material and training.

These modules were initially developed under the UNODC Education for Justice (E4J) initiative, and material was subsequently adapted to the specific contexts of three countries under UNODC's Global Integrity Education (GIE) project.

The survey will be circulated to all lecturers who participated in the project in Kenya, Mexico and Pakistan. The survey will be translated into Spanish (for Mexico). It will be sent as a link, attached to a text message or email. The survey will be hosted on Survey Planet and can be conducted on a mobile phone. All but three questions are multiple choice. It will take about 5 minutes to complete.

The draft questionnaire below is customised for Kenyan participants.

"Please find attached a link to an online survey about the UNODC Global Integrity Education (GIE) project. The project aimed to strengthen university anti-corruption, ethics and integrity education by making localised training materials and training available to university lecturers in Kenya, Mexico and Pakistan. The project ran from 2019 to 2023 and aimed to equip young graduates with ethical mindsets at the start of their careers in the private sector and empowers them to become a driving force for ethical business in their community and workplace.

The project is currently being evaluated and you are requested to provide feedback on the relevance, usefulness and impact of the UNODC GIE materials and training for your anti-corruption, ethics and integrity teaching in Kenya.

The survey is anonymous, and the results are only seen by external evaluators. Should you wish to discuss the project, the survey, or the evaluation in detail please email ..... Thank you for your time."

Top of Form

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### Evaluating UNODC GIE Project Anti-corruption and Integrity and Ethics Module Material and Training

- How have you participated in the GIE project (tick as many as are relevant)?
  - Completed the online 'Implementing the UN Integrity Curriculum at Universities Course'
  - Attended an in-person GIE training session
  - Adjusted existing teaching content to include GIE content
  - Used GIE exercises, tools, reading material and video in courses
  - Added a stand-alone GIE module/s to the curriculum
  - Other (please specify):
- How relevant was the UNODC GIE focus on anti-corruption, ethics and integrity to your teaching responsibilities at the university?
  - Greatly
  - Somewhat
  - Unsure
  - Not much
  - Not at all
- The project developed four Modules localised for Kenya. Rank these four modules in terms of their relevance to your teaching?
  - Corruption and Good Governance

- Private Sector Corruption
  - Business Integrity and Ethics
  - Ethics and Society
4. How many students per year attend anti-corruption, ethics or integrity classes you teach that have been influenced by the UNODC GIE material or training?
    - Less than 50
    - 50-100
    - 100-200
    - 200-500
    - More than 500
  5. What is the level of the courses you teach that have been influenced by the UNODC GIE material or training?
    - Under-graduate
    - Post-graduate
    - Short professional development courses
    - All the above
  6. Please rate the quality of the GIE training provided by UNODC?
    - High quality
    - Good quality
    - Average quality
    - Below average quality
    - Low quality
    - I did not attend any training
  7. Please rate the quality of the UNODC GIE module material?
    - High quality
    - Good quality
    - Average quality
    - Below average quality
    - Low quality
    - I did not access any UNODC GIE material.
  8. To what extent did GIE material and training enable you to improve the content of your teaching on anti-corruption, ethics and integrity?
    - Greatly
    - Somewhat
    - Unsure
    - Not much
    - Not at all
  9. To what extent did attending the GIE material and training enable you to improve your teaching methodology on anti-corruption and/or ethics and integrity?
    - Greatly
    - Somewhat
    - Unsure
    - Not much
    - Not at all
  10. How effective was UNODC's communication with you about the GIE programme, material and training?
    - Very good
    - Good
    - Ok
    - Poor
    - No communication
  11. Did the GIE programme enable you to access any practical private sector involvement in your course delivery?
    - Yes
    - No
  12. Will you continue to use your GIE material in future courses and lectures?
    - Yes
    - No

13. Has this UNODC GIE material and training project helped you include more content that advances gender equality, disability inclusion and the interests of other vulnerable groups?

- Greatly
- Somewhat
- Unsure
- Not much
- Not at all

14. What was most valuable about your engagement with the UNDOC GIE programme?

Free text

15. Do you have any suggestions about how the GIE material or training could be made more relevant and accessible?

Free text

16. Do you identify as ...

- Male
- Female
- Other
- Do not wish to be identified

17. If you would be willing to participate in a focus group to discuss this subject in more detail, please provide an email address with which the evaluators can reach you to arrange date

Free text

## ONLINE SURVEY/QUESTIONNAIRE: PRIVATE SECTOR COMPANIES

The following survey will be sent out to private sector companies who participated in the UNODC BIM project by using the Anti-corruption, Integrity and Ethics material.

The survey will be circulated to all firms that participated in the project. The survey will be translated into Burmese. It will be sent as a link, attached to a text message or email. The survey will be hosted on Survey Planet and can be conducted on a mobile phone. All but three questions are multiple choice. It will take about 5 minutes to complete.

“Please find attached a link to an online survey about the UNODC Business Integrity Myanmar (BIM) project. The project aimed to strengthen business anti-corruption, ethics and integrity education by making localised training materials and training available to business in Myanmar. The project ran from 2019 to 2023 and is currently being evaluated and you are requested to provide feedback on the relevance, usefulness and impact of the UNODC BIM material.

The survey is anonymous, and the results are only seen by external evaluators. Should you wish to discuss the project, the survey, or the evaluation in detail please email ..... Thank you for your time.”

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Top of Form

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### Evaluating UNODC BIM Project Anti-corruption, Integrity and Ethics Material

1. Have you or employees of your company used any of the following training and assessment tools available through the Business Integrity Myanmar (BIM) project website to improve business integrity practices? Please tick the box if company employees have used the tool.
  - The Serious Game on Business
  - Integrity Online Training Tool
  - The online corruption risk assessment tool.
2. Did you or other employees of your company attend any of the following Business Integrity training modules organized by BIM in 2022 or 2023? Please tick the box if company employees attended a module.
  - Module 1: Leading with Integrity
  - Module 2: Whistleblowing
  - Module 3: Corruption Risk Assessment

3. Did you or other employees of your company attend any of the 3 business integrity webinars for sharing best practices organized by BIM?
  - Yes
  - No
  
4. Has your company used any of the following model policies available through the Business Integrity Myanmar project website to improve its integrity policies and practices? Please tick the box where the company has used one of the following templates.
  - The model business code of conduct
  - The standard operating procedure for code of conduct for companies
  - The draft model whistle-blowing/speak up policy.
  
5. How relevant was the UNODC's focus on anti-corruption, ethics and integrity material for your organisation?
  - Greatly
  - Somewhat
  - Unsure
  - Not much
  - Not at all
  
6. How many members of your staff have attended BIM integrity training sessions, webinars or accessed online packages?
  - None
  - Only 1
  - 2-5
  - 5-10
  - More than 10
  
7. Who in your organisation has used BIM offerings and products?
  - Legal and Compliance Staff
  - Administrative Staff
  - Human Resource Staff
  - Managers
  - All staff
  - None
  
8. Please rate the quality of the online tools, training and templates provided by BIM?
  - High quality
  - Good quality
  - Average quality
  - Below average quality
  - Low quality
  - My company did not use any tools, training or templates.
  
9. To what extent did BIM's tools, training and materials enable you to improve the content of your organisation's ethics and compliance programme?
  - Greatly
  - Somewhat
  - Unsure
  - Not much
  - Not at all
  
10. How effective was BIM's communication with you about the project, material, workshops and training?
  - Very good
  - Good
  - Ok

- Poor
  - No communication
11. Will your organisation continue to use the tools, templates and other material developed by BIM in the future?
- Yes
  - No
12. In your opinion will the training material, tools and templates developed by BIM remain valid over the next 5 years?
- Yes, completely valid
  - Yes, but will require some updating to remain valid
  - Maybe, but it will require significant effort to remain valid and useful
  - Not valid
13. Have BIM's activities and material helped advance gender equality, disability inclusion and the interests of other vulnerable groups?
- Greatly
  - Somewhat
  - Unsure
  - Not much
  - Not at all
14. What was most significant aspect about your engagement with BIM?
15. Do you have any suggestions about how BIM's tools, training, template and other activities could be made more relevant and accessible?
16. Do you identify as ...
- Male
  - Female
  - Other
  - Do not wish to be identified

## GROUP INTERVIEW GUIDES AND ARRANGEMENTS

Stakeholder group	Number of participants	Facilitator	Note taker	Expected duration and modality
Lecturers	324	Mr David Schmidt	Mr Angus Henderson	2-hour open discussion – 2 x sessions per country (x3)
Ethics Ambassadors	49	Mr David Schmidt	Mr Angus Henderson	2-hour open discussion – 2 x sessions per country (x3)

The group interviews will be conducted based on feedback from an online survey of 345 lecturers (above) and invitations sent to 49 ethics ambassadors. The plan is to provide two sessions per country, but this could be expanded if there is higher than expected uptake. Each period will be run as an informal discussion, guided by the questions below. The idea is to pose a question and listen to multiple responses. The evaluation is not trying to gain a consensus, instead it is looking for examples that can be used as vignettes or case studies.



## Script

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 "Work on Strengthening Integrity and Anti-Corruption" specifically the Global Integrity Education Project. The evaluation is undertaken in line with UNODC and UNEG norms and standards for evaluation.

The purpose of this focus group is to explore the hypothesis that the cluster responded to identified shortfalls in a coherent manner. Its well-planned and resourced activities were delivered on time and within budget. The impact of the cluster is meaningful and will endure. So should UNODC plan a similar intervention, any lessons learnt that can be taken forward into the new project.

This focus group interview will be conducted by Mr David Schmidt and Mr Angus Henderson.

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

## GROUP INTERVIEW QUESTIONS FOR LECTURERS:

Questions
Did the cluster respond to identified shortfalls in a coherent manner?
Are there many synergies between UNODC's project and your own teaching and organisational priorities?
Can interventions such as UNODC's support the creation of fair and clean market conditions in your country?
In your opinion, how well did UNODC do in managing its relationships with universities sector?
Did the module material and training talk sufficiently to the anti-corruption, ethics and integrity context of your country? Were the modules localised for your country more useful than the general anti-corruption and integrity modules available through the GIE portal?
How well was the cluster delivered compared the intervention logic?
In your opinion how did UNODC's work strengthen the incentives for corporate integrity and cooperation through enhancement of dialogue and international exchange?
Explain how the UNODC's module material and training improved the content and the delivery of anti-corruption, ethics and integrity teaching at universities your country.
To what extent did participation in the UNODC project provide you with feedback on your own teaching (and the teaching of other participating lecturers) and did this contribute to improving your teaching?
In your opinion, how did UNODC's work contribute to improving anti-corruption, ethics and integrity management capacity in the private sector? How important and effective has the training and support for ethics ambassadors been in this regard?
Did you see any competing demands within the project relating to different rights holders that potentially blocked equitable and gender transformative results?
What was the impact of the cluster and are these gains sustainable?
In your own words can you describe the effects of the project?
What might occur in the next 5 years?
Has the UNODC project helped advance gender equality, disability inclusion and the interests of other vulnerable groups in your teaching practice or the private sector?
What should be done if UNODC were planning a similar intervention?

With the ability of hindsight can you identify anything that UNODC could learn from the delivery of this cluster?

## GROUP INTERVIEW QUESTIONS FOR ETHICS AMBASSADORS:

Questions

Did the cluster respond to identified shortfalls in a coherent manner?

Are there synergies with what the UNODC project tried to deliver and your company and broader private sector priorities?

In your opinion, do interventions such as the UNODC project support the creation of fair and clean market conditions in your country?

How well did UNODC manage its relationships with the private sector?

Did UNODC's training and support material talk sufficiently to the anti-corruption, ethics and integrity context of your country?

How well was the cluster delivered compared to the intervention logic?

In your opinion, how did the ethics ambassador training and support improve your own capacity to tackle anti-corruption, ethics and integrity management in your company?

To what extent has the project enabled the creation of a network of ethics ambassadors that enhances anti-corruption and integrity practice in the private sector?

In what ways did UNODC's work bring together academia and business to promote ethics and integrity in the private sector?

Did you see any competing demands within the project relating to different rights holders that potentially blocked equitable and gender transformative results?

What was the impact of the cluster and are these gains sustainable?

In your own words can you describe the effects of the project on your company and the private sector?

In your opinion, will the ethics ambassador concept continue in your company and other participating companies after the end of the GIE project?

What might occur in the next 5 years?

What should be done if UNODC were planning a similar intervention?

With the ability of hindsight can you identify anything that UNODC could learn from the delivery of this cluster?

# ANNEX IV: DESK REVIEW LIST

## UNODC DOCUMENTS

- UNODC Strategy (2021-2025)
- The United Nations Convention against Corruption (2003)
- UNCAC National Anti-Corruption Strategies. A Practical Guide for Development and Implementation (2015)
- UNODC Country Programme for Myanmar (2014-2017) – extended to 2019, and currently being extended to 2024
- UNODC Regional Programme Southeast Asia and the Pacific (2022-2026)
- UNODC Regional Programme for Southeast Asia (2014-2017)
- United Nations Sustainable Development Framework (UNDAF) for Pakistan (2018-2022)
- United Nations Development Assistance Framework (UNDAF), Mexico Partnership Landscape Assessment (2021)
- United Nations Sustainable Development Cooperation Framework for Mexico (2020-2025) SPANISH
- United Nations Development Assistance Framework (UNDAF) for Kenya (2018-2022)
- United Nations Sustainable Development Cooperation Framework for Kenya (2022-2026)
- Project documents, funding agreement and workplan for GIE
- Interim Financial Reports (2020 - 2023) for GIE - 4
- Annual Financial Reports (2019 - 2022) for GIE - 4
- Project revision documents (2020 - 2022) for GIE - 3
- Interim Progress Reports (2020-2023) for GIE - 4
- Annual Progress reports (2020-2022) for GIE - 3
- Final Progress report (2023) for GIE
- Reports from Independent In-Depth Cluster Evaluation on Anti-Corruption in Mexico (May 2023)
- Report from Independent In-Depth Mid-term Evaluation of the Global Programme on Anti-corruption – GLOZ99 (June 2021)
- Project documents, funding agreement and workplan for Myanmar
- Interim Financial Reports (2020 - 2023) for Myanmar - 4
- Annual Financial Reports (2020 - 2022) for Myanmar - 3
- Project revision documents for Myanmar - 3
- Interim Progress Reports (2020 - 2023) for Myanmar - 4
- Annual Progress Reports (2020 - 2022) for Myanmar - 3
- Final Progress Report (2023) for Myanmar
- Project revisions - 3
- A Resource Guide on State Measures for Strengthening Corporate Integrity (2013)
- An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide (2013)
- UNODC Business Integrity Portal
- UNODC Business Integrity Portal Resources page
- UNODC website: UNODC and the Sustainable Development Goals
- UNODC brochure: UNODC and the Sustainable Development Goals
- UNODC brochure: Better Data to monitor violence, trafficking, corruption and access to Justice (2017)
- ECOSOC Report of the Inter-agency and Expert Group on Sustainable Development Goal Indicators (E/CN.3/2017/2\*)
- UNODC Independent Evaluation Section: Meta-Analysis 2011-2014
- UNODC Independent Evaluation Section: Meta-Analysis 2015-2016
- UNODC Independent Evaluation Section: Evaluation-based analysis of good practices in UNODC's approach to capacity building

- United Nations Development Assistance Framework Guidance (2017)
- UNODC Independent Evaluation of Regional Programme for Southeast Asia and the Pacific, Annex V Myanmar
- UNODC ROSEAP What we do: Anticorruption
- Project document - Incentives to Corporate Integrity- UNODC and Siemens
- Project document 6 Ps - UNODC - Siemens - FINAL
- Project document Outreach - UNODC - Siemens
- Final Independent Cluster Evaluation Report GLOX 30-32\_18FEB2015
- GIE pilot impact assessment - Brief
- GIE pilot impact assessment - Report
- GIE pilot impact assessment - Annex A Mexico
- GIE pilot impact assessment - Annex B Pakistan
- Meta-synthesis of the work of UNODC in Mexico 2016-2023
- EATP Booklet (developed by partner university) for Pakistan
- Infographic GIE Mexico
- Infographic GIE Pakistan
- Infographic GIE Kenya
- UNODC Integrity Training Evaluation Results Report Final INTERNAL Document

## EXTERNAL DOCUMENTS

- UNITED NATIONS Sustainable Development Cooperation Framework Kenya 2022-2026
- Kenya UNDAF 2018 - 2022
- Kenya UNDAF progress reports
- Myanmar Sustainable Development Plan (2018 – 2030)
- Pakistan UNSDCF 2023 - 2027
- UNITED NATIONS SUSTAINABLE DEVELOPMENT FRAMEWORK FOR PAKISTAN 2018 -2022
- UN Sustainable Development Cooperation Framework of Mexico 2020-2025 (UNSDCF) Mexico Cooperation Framework 2020.08
- Joint press release by Siemens AG and the World Bank
- World Bank overview of Kenya
- World Bank overview of Myanmar
- World Bank overview of Pakistan
- World Bank overview of Mexico
- Doing Business in Mexico - World Bank
- Doing Business in Kenya - World Bank
- Doing Business in Pakistan - World Bank
- Doing Business in Myanmar - World Bank
- Corruption Perception Index: Transparency International
- Transparency International Kenya
- Transparency International Myanmar
- Transparency International Mexico
- Transparency International Pakistan
- Fighting Corruption: What Role for Civil Society? The Experience of the OECD
- UNDP Pakistan
- EU network against corruption
- Exporting Corruption Privatisation, Multinationals & Bribery: The Corner House
- Mexico Country profile
- Mexico: Overview of corruption and anti-corruption efforts
- Implementing the OECD Anti-Bribery Convention in Mexico
- MEXICO: 'Civil society is a retaining wall against government malpractice'

- BTI: Mexico Country Report 2024
- OECD Responsible Business Conduct Policy Reviews MEXICO
- NGO Source: Guest Blog: Brief Overview of Civil Society Organizations in Mexico
- NGO Corruption Fighters' Resource Book – How NGOs can use monitoring and advocacy to fight corruption
- Conflict Prevention in Kenya: Combating Corruption through Nonviolent Action
- EACC: National Ethics and Corruption Survey (Kenya)
- Kenya Country profile
- Non-governmental Organizations and Corruption: The Case of Kenya
- Overview of Civil Society Organizations: Pakistan
- Responsible Business Organisation in Myanmar – Annual report Pwint Thit Sa for 2022  
[https://www.myanmar-responsiblebusiness.org/pdf/TiME/2019-Pwint-Thit-Sa\\_en.pdf](https://www.myanmar-responsiblebusiness.org/pdf/TiME/2019-Pwint-Thit-Sa_en.pdf)

## ANNEX V: STAKEHOLDERS CONTACTED DURING THE EVALUATION

Number of stakeholders	Type of stakeholder (see note below)	Sex disaggregated data	Country(ies)
15	UNODC Staff and funder	Male: 6 Female: 9	Austria, Germany, Mexico, Myanmar, Pakistan, Kenya
16	Private Sector Companies	Male: 9 Female: 7	Myanmar, Pakistan, Mexico
47	University Lecturers	Male: 26 Female: 21	Mexico, Pakistan, Kenya
10	Ethics Ambassadors	Male: 7 Female: 3	Mexico, Pakistan, Kenya
6	CSOs	Male: 2 Female: 4	Mexico, Myanmar, Pakistan, Kenya
5	INGOs	Male: 2 Female: 3	Myanmar, Pakistan
Total: 99		Male: 52 Female: 47	

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

### STAKEHOLDERS PARTICIPATING IN SURVEYS OR OTHER FORMS OF WRITTEN FEEDBACK:

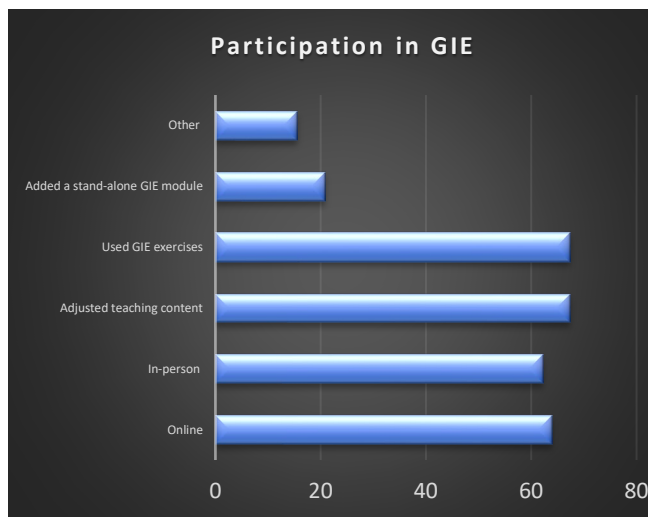
Type of stakeholder	Number of responses	Sex disaggregated data
University Lecturers	61	Male: 29 Female: 29 Not identified: 3
Private Sector Company's (Myanmar only)	13	Male: 7 Female: 5 Not identified: 1

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.

## APPENDIX 1. SURVEY RESULTS AND ANALYSIS

1. This appendix contains the result from two online surveys that were conducted as part of the evaluation process.
2. The following survey was sent to lecturers who participated in UNODC GIE training and/or had received UNODC material that they could incorporate into their own teaching. The total universe of people who had received ToT was in the region of 395, however, UNODC was only able to identify approximately 150 as lecturers. The overall response rate is 38%, which equates to a sample size of 19% of the universe. Given the fact that not every lecturer is still working, that not every email address, or mobile was correct, and that the survey was sent out over a semester break, this represents a fair sample size. Of those who replied, 62% agreed to follow-up calls and group discussions.

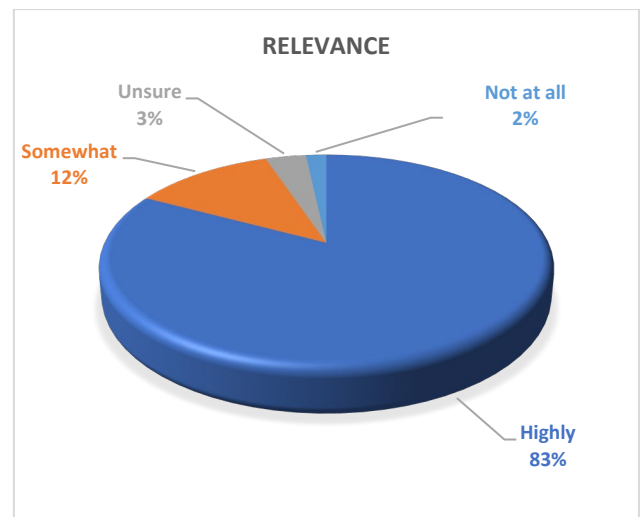
Question 1: How have you participated in the GIE project?



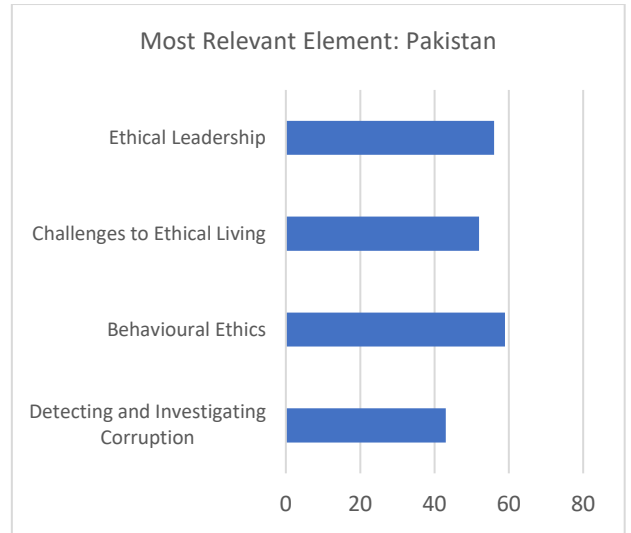
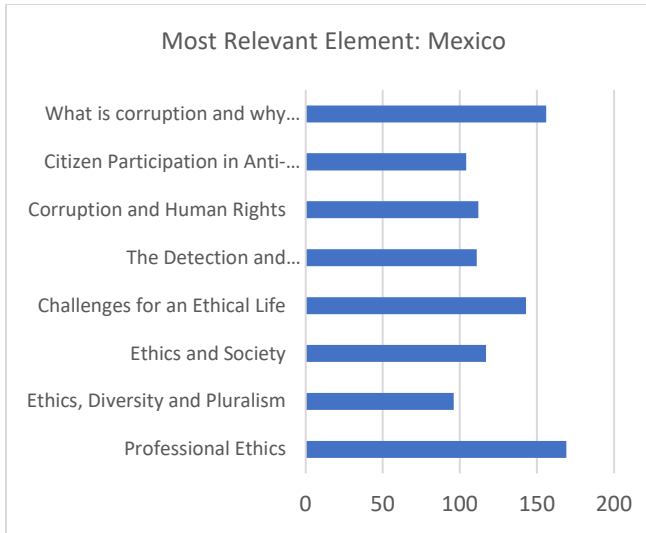
Analysis: Responses indicated that GIE had engaged with them in multiple ways. 68% had used GIE teaching exercises and / or adjusted their own teaching content. Slightly more people had engaged online (63%) than in person (62%). 20% had added a UNODC module as a stand-alone element to their courses.

Question 3: The project developed different modules localized for Kenya, Pakistan and Mexico. Participants were required to rank these modules in terms of their relevance to their teaching.

Question 2: How relevant was the UNODC GIE focus on anti-corruption, ethics and integrity to your teaching responsibilities at the university?

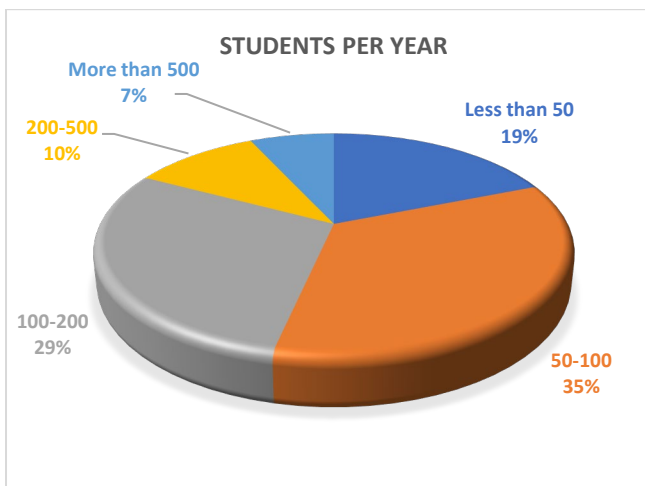


Analysis: 83% of respondents stated that GIE's focus on anti-corruption and integrity was highly relevant in relation to their university instruction.

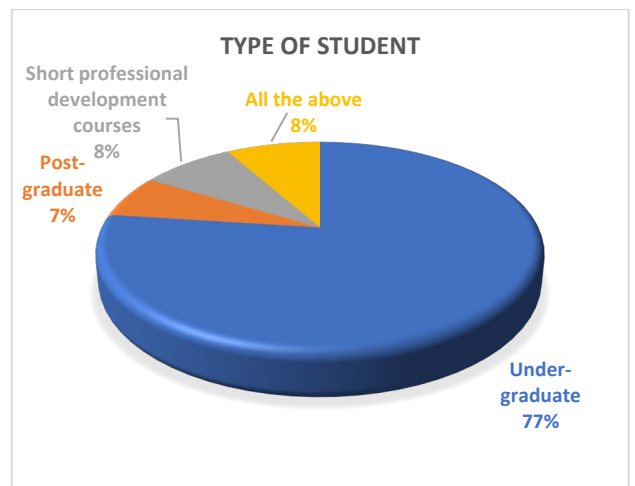


Analysis: In each country, different elements of the E4J initiative were selected. These modules were then localized in working groups of academics and representatives from the private sector. Each country found different elements more or less relevant. In Mexico, the most relevant was Professional Ethics, in Pakistan, Behavioural Ethics and in Kenya, Corruption and Good Governance.

Question 4: How many students per year attend anti-corruption, ethics or integrity classes you teach that have been influenced by the UNODC GIE material or training?



Question 5: What is the level of the courses you teach that have been influenced by the UNODC GIE material or training?



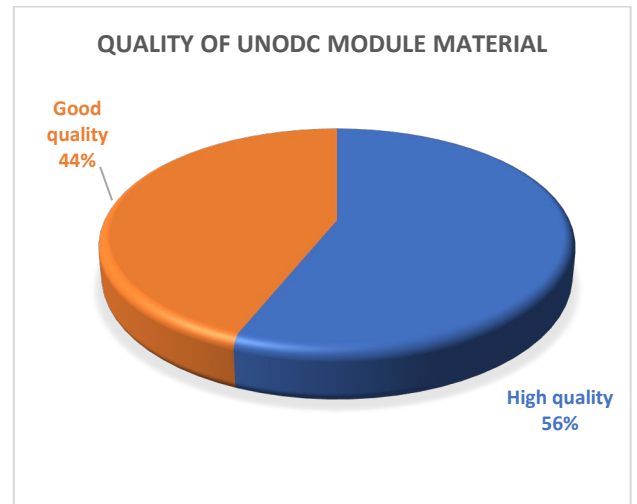
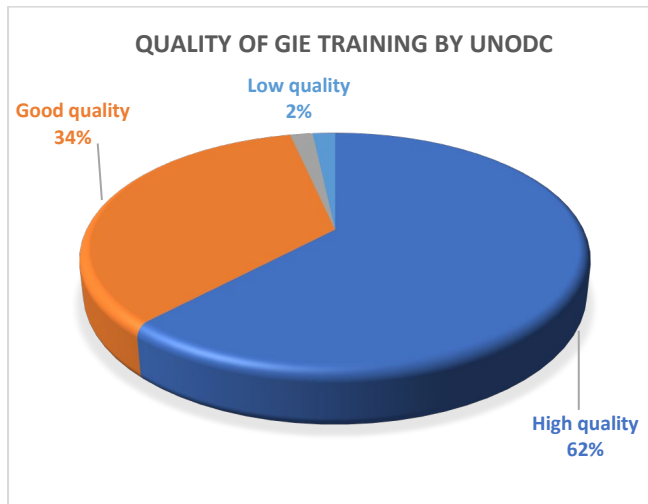


Analysis: From the lecturers who responded, an estimated over 6,000 students per year are being taught GIE material. If this figure is extrapolated to the entire cohort of lecturers, the figure could be as high between 15,000 and 20,000.

Analysis: Most GIE training is delivered to undergraduates, however, 15% is delivered to postgraduate or short professional courses.

Question 6: Please rate the quality of the GIE training provided by UNODC?

Question 7: Please rate the quality of the UNODC GIE module material?

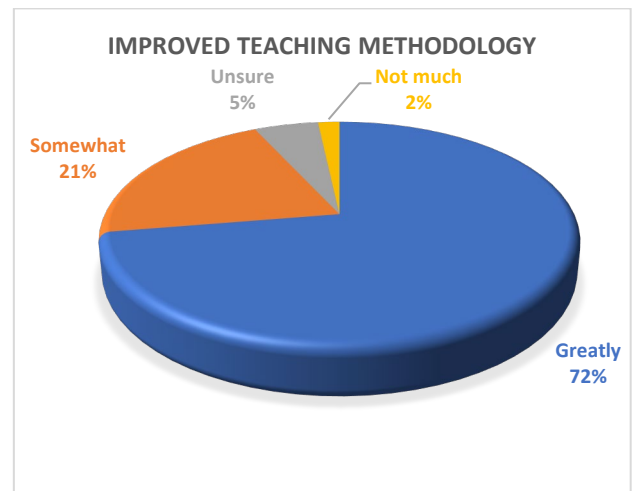
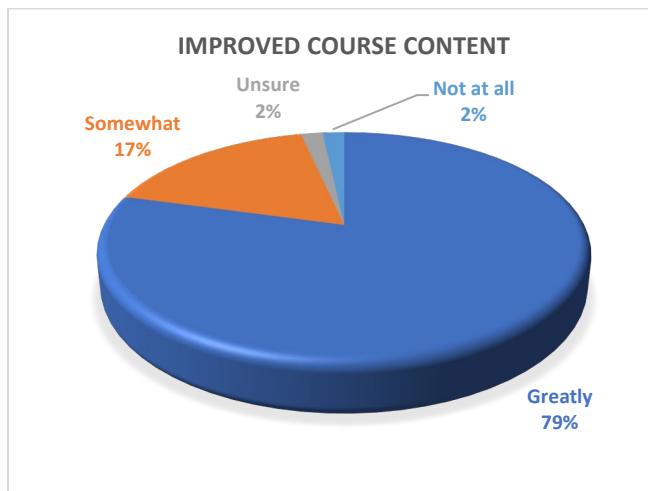


Analysis: 62% of respondents stated that the quality of UNODC training was high quality. 34% stated that it was good quality.

Analysis: 56% of respondents stated that the quality of UNODC teaching material was high quality. 44% stated that it was good quality.

Question 8: To what extent did GIE material and training enable you to improve the content of your teaching on anti-corruption, ethics and integrity?

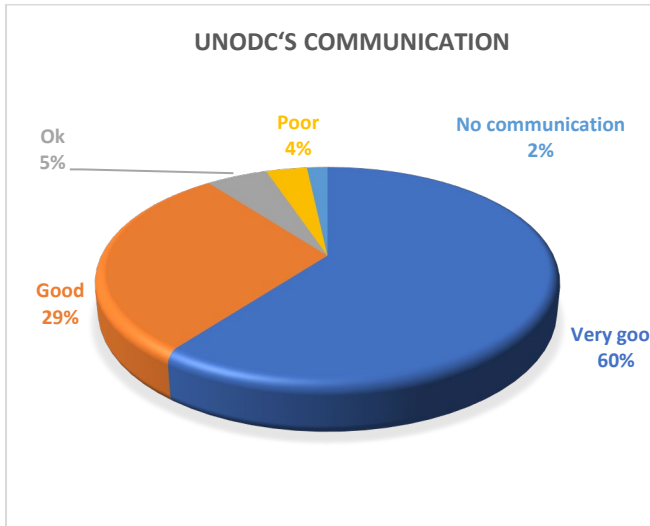
Question 9: To what extent did attending the GIE training enable you to improve your teaching methodology on anti-corruption and/or ethics and integrity?



Analysis: 79% of respondents stated that GIE material and training enabled them to improve the content of their teaching on anti-corruption, ethics and integrity.

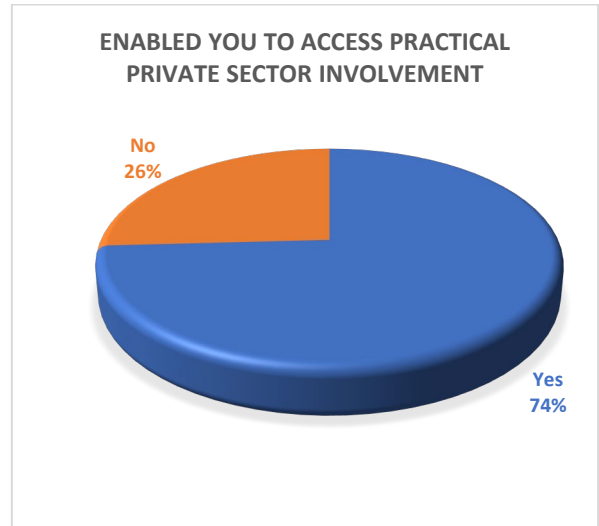
Analysis: 72% of respondents stated attending the GIE training enable them to improve their teaching methodology on anti-corruption and/or ethics and integrity.

Question 10: How effective was UNODC’s communication with you about the GIE programme, material and training?



Analysis: 60% of respondents stated that UNODC’s communication with them about the GIE programme, material and training was very good.

Question 11: Did the GIE programme enable you to access any practical private sector involvement in your course delivery?



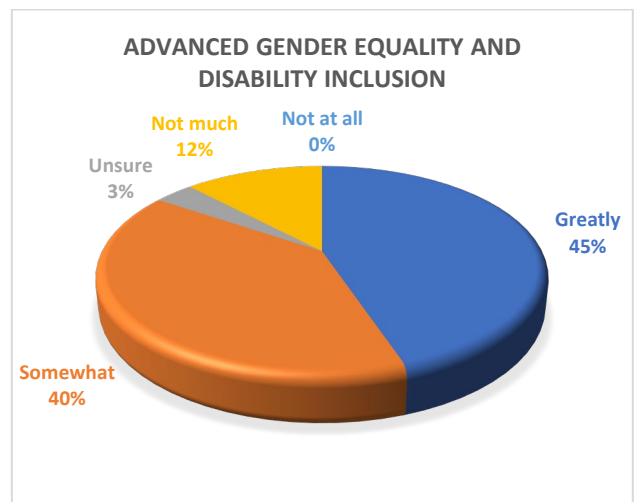
Analysis: 74% of respondents stated that the GIE programme enabled them to access any practical private sector involvement in their course delivery.

Question 12: Will you continue to use your GIE material in future courses and lectures?



Analysis: 90% of respondents stated that they will continue to use GIE material in future courses and lectures.

Question 13: Has this UNODC GIE material and training project helped you include more content that advances gender equality, disability inclusion and the interests of other vulnerable groups?



Analysis: 45% stated that GIE greatly advanced the inclusion of Leaving No One Behind content in their teaching material.

Do you identify as ...



Improvement

Analysis: There was a near even split between male and female lecturers.

The following quotes were taken from free text feedback provided by lecturers using GIE material in Kenya, Pakistan and Mexico. They were asked for what in their opinion the most important element of the GIE project was and what could be done to improve delivery of future projects.

- "Professional development of both teachers and students."
- "Comprehensive approach to integrating ethical principles and anti-corruption measures into educational curricula."
- "It provided practical tools and real-world applications, fostering a deep understanding of integrity and transparency."
- "The collaborative nature of the program, encouraged sharing experiences and strategies with peers from diverse backgrounds, was instrumental in broadening my perspective and enhancing my ability to implement effective integrity education."
- "Wonderful experience and a brainstorming engagement for me."
- "The extensive series of hands-on workshops, activities, seminars, webinars, virtual panel discussions and multi-level competitions opened a huge arena of professional development."
- "The collaboration of stakeholders from all walks of society such as teachers, students, emerging young graduates, ethics ambassadors, private sector executives and institutional heads along with civil society to advance ethical conduct in the society."

"Continuous message to students regarding Halal income, its benefits and downside of Haraam in this world also."

- "Interacting with community leaders from across the country and realizing the difference in magnitude of ethical issues in different cultures and traditions of provinces"
- "Empower students to effectively counter ethical challenges"

"Meeting like-minded individuals"

- "Realization of how important ethics are in routine life and how we give least importance to this area"
- "ethics & integrity begins with me"
- "Life has become more costly because of corruption in Governance"
- "The most valuable element was the awakening of the ethics and integrity culture in both the learners and the lecturer."
- "Understand that there are many professionals involved in the issue of ethics and corruption with university students."
- "The completeness of the materials."
- "Encourage in students the importance of being ethical in the workplace for the good of society and each individual."
- "Raise awareness among students to detect and report cases of corruption that may affect companies and society."
- Promote ethics and critical thinking in future professionals."

- “The contents of the modules have very well complemented courses and sessions related to the role of integrity in the performance of professions and other topics of professional ethics, inclusion and human rights.”
- “Great material that manages to make us feel like teaching colleagues from many institutions and countries united in the same goal or ideal.”
- “Access to specialized materials developed by specialists, teacher training and peer learning.”
- “The participation of companies presenting real cases”

Areas for future development are:

- **Update the material:** More practical case studies / update with cases from 2024. Some more aspects can be added in the local context. Adding more indigenous material.

**Digital accessibility:** It is a better approach to engage the members more occasionally.

Develop an online platform with easily accessible resources, webinars, and forums for discussion. This could include multilingual support to ensure inclusivity for participants from different linguistic backgrounds. Shared drive for all material. Provide a link that can be uploaded online and shared with all members. The members can in turn share the link with their students. It should be developed as a video-based virtual programme. Design short activities with online videos or audiovisual resources.

**Formal certification.** Virtual courses with formal certification. The courses should be formalized. Students should get their credit hours after studying these materials. The concepts should also be tested in exams.

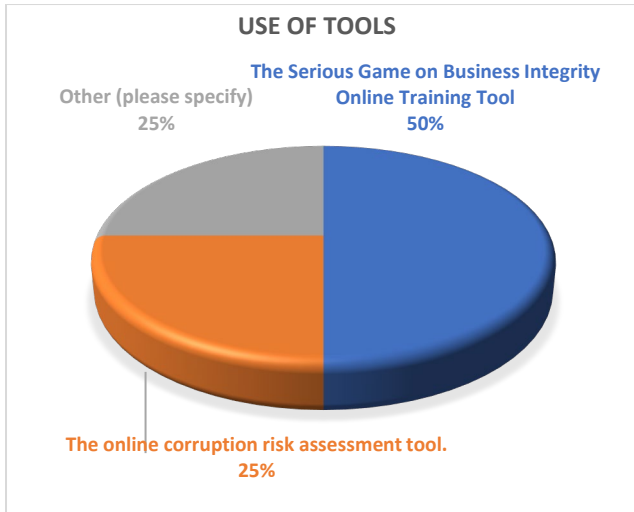
- **More training:** Train more university faculties for wider reach of students, raise awareness about leading an ethical life and being ambassadors of integrity. Increase university stakeholders e.g. regulators, administration and faculty in order to have the GIE material incorporated in all the programmes.
- **Expand the programme:** That it be promoted through more media and in consultation with the government sector of more states and municipalities. That the participating universities be more disseminated as an additional attribute or commitment to education. Develop material for the schools. Access universities to add one module in their teaching course outline, to ensure embedded discussion on integrity relevant to the course content. That will be more effective compared to stand alone sermons on integrity.

**Expand the scope.** The scope of the programme should be expanded in different universities, colleges and schools. Assist more private companies. The more we involve our youth in such activities the better we will equip them to become honest leaders. It is not a day's job, it is a constant effort and needs series of workshops. Continuous training and communication through emails. Schools and college level engagement in the GIE material. Training teachers and students at that level can materialize a greater impact since that is the most important place to inculcate ethical leadership in youngsters.

3. The following survey was sent to all the 22 companies that UNODC had directly assisted as part of the Businesses Integrity Myanmar project.

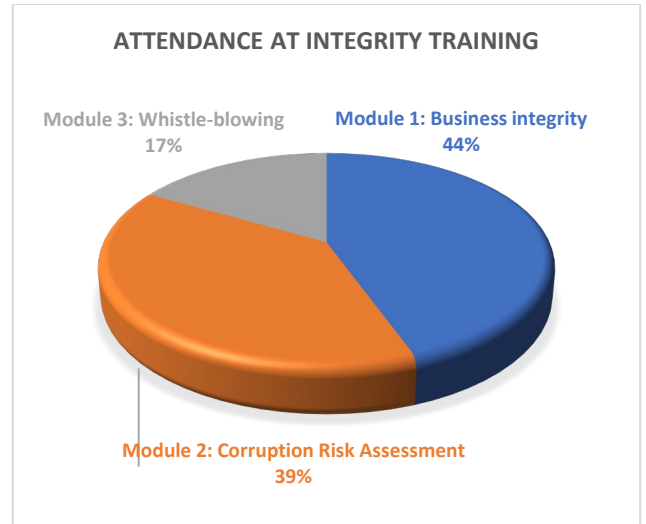
Question 1: Have you, or employees of your company used any of the following training and assessment tools available through the Business Integrity Myanmar (BIM) project website to improve business integrity practices?

Question 2: Did you or other employees of your company attend any of the following Business Integrity training modules organized by BIM in 2022 or 2023? Please tick the box if company employees attended a module.



Analysis: 50% of people had used the online game.

Question 3: Did you or other employees of your company attend any of the 3 business integrity webinars for sharing best practices organized by



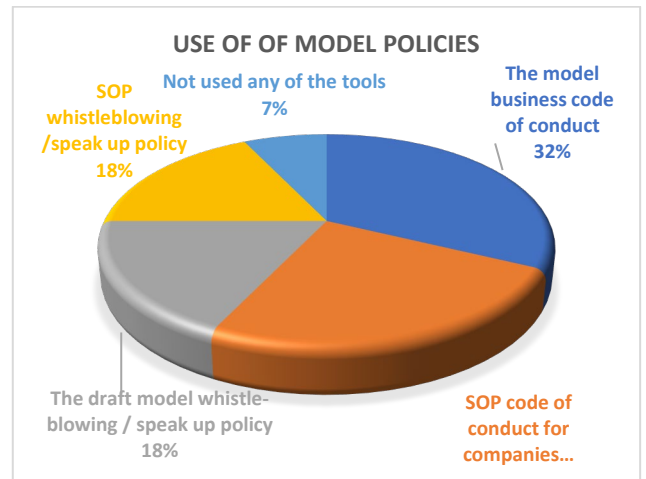
Analysis: All training modules had been attended with the most frequent module being Business Integrity.

Question 4: Has your company used any of the following model policies available through the Business Integrity Myanmar project website to improve its integrity policies and practices? Please tick the box where the company has used one of the following templates.



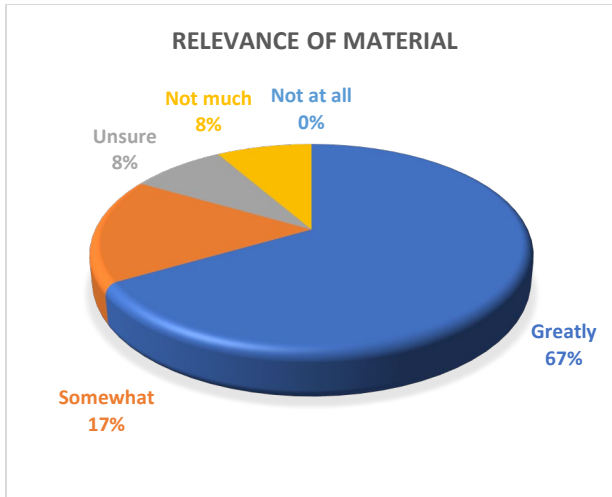
Analysis: 67% of respondents had also attended webinars in addition to training.

Question 5: How relevant was the UNODC's focus on anti-corruption, ethics and integrity material for your organisation?



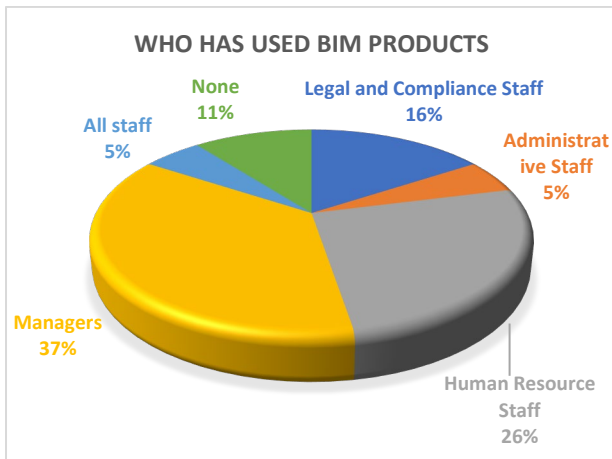
Analysis: The most frequently used model policy was the code of conduct

Question 6: How many members of your staff have attended BIM integrity training sessions, webinars or accessed online packages?



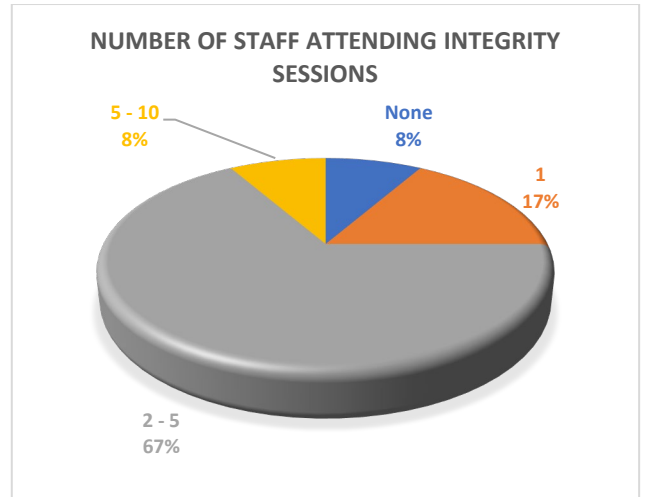
Analysis: 67% of respondents stated that UNODC's material was highly relevant and 17% somewhat.

Question 7: Who in your organisation has used BIM offerings and products?



Analysis: Managers were the most common recipients of integrity training or users of UNDOC products.

Question 9: To what extent did BIM's tools, training and materials enable you to improve the content of your organisation's ethics and compliance programme?



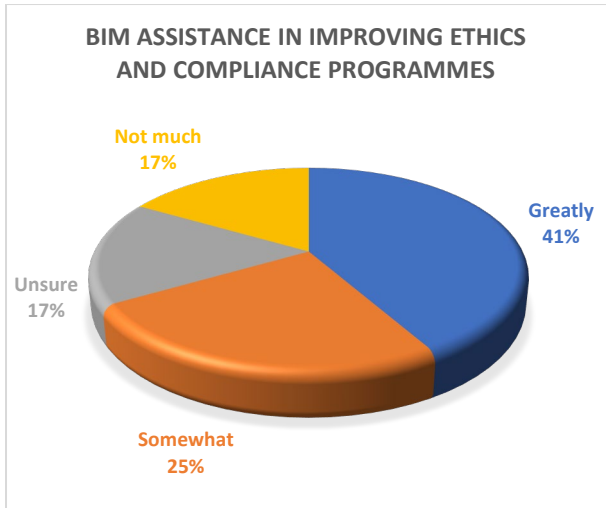
Analysis: Most companies sent between 2 and 5 staff to UNODC training events. Overall, about 80 staff were trained.

Question 8 Please rate the quality of the online tools, training and templates provided by BIM?



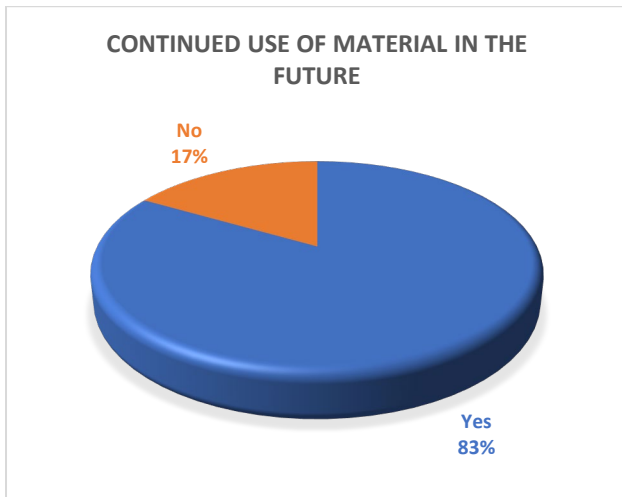
Analysis: 34% of respondents stated that UNODC's material was high quality and 50% good quality.

Question 10: How effective was BIM's communication with you about the project, material, workshops and training?



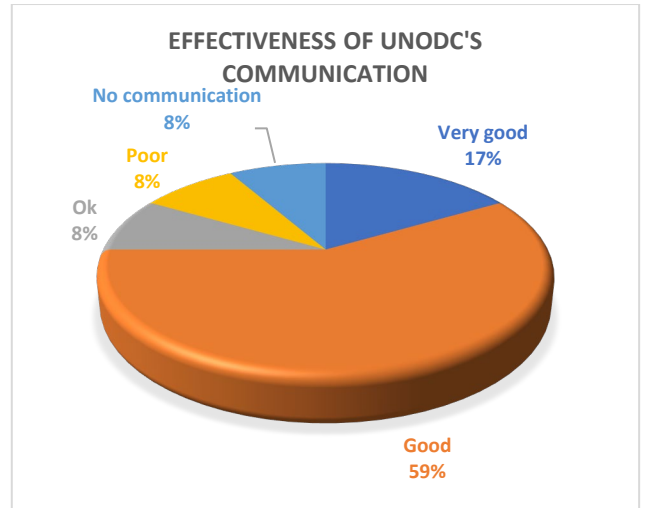
Analysis: 41% of respondents stated that BIM has greatly assisted them in improving their ethics and compliance programmes, with 25% stating that it had somewhat assisted.

Question 11: Will your organisation continue to use the tools, templates and other material developed by BIM in the future?



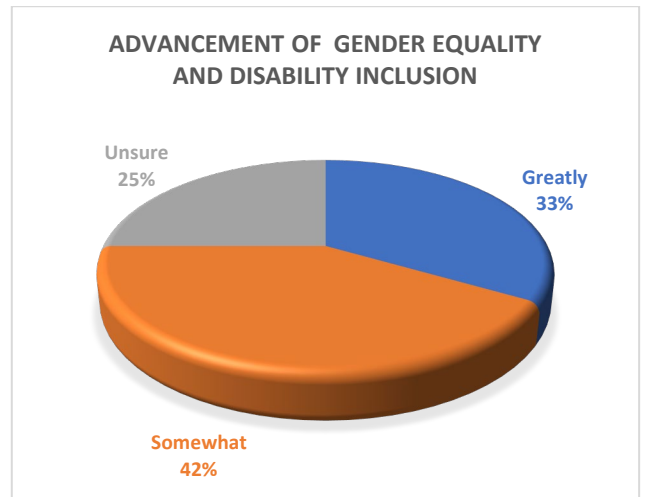
Analysis: 83% of respondents stated that they will continue to use the material in the future.

Question 13: In your opinion will the training material, tools and templates developed by BIM remain valid over the next 5 years?



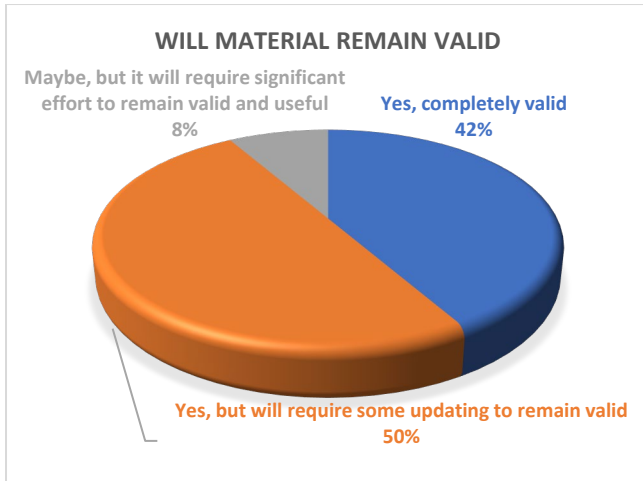
Analysis: 59% of respondents reported that UNODC's communication was good, 17% very good. However, 24% rated it as ok to poor.

Question 12: Have BIM's activities and material helped advance gender equality, disability inclusion and the interests of other vulnerable groups?

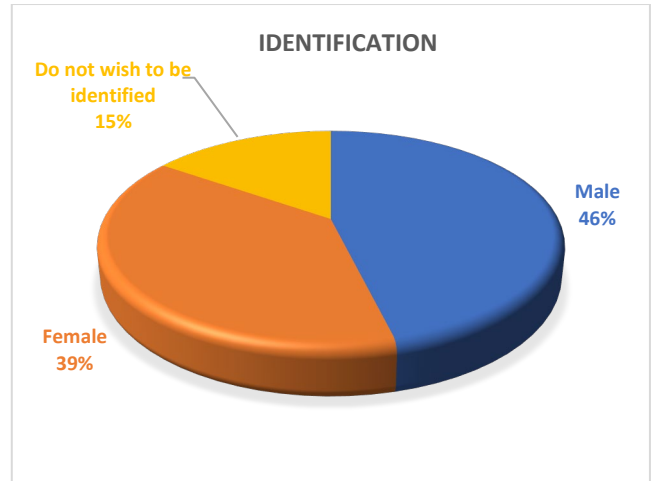


Analysis: 33% of respondents stated that UNODC's material had greatly advanced the issue of gender equality and diversity and 43% somewhat.

Question 14: Do you identify as ...



Analysis 42% stated that UNODC's material will remain valid over the next 5 years. 50 stated it will require updating to remain valid.



Analysis: 46% of respondents were male and 39% female. 15% did not wish to be identified.



## APPENDIX 2. ANALYSIS OF 'IMPACT ASSESSMENT TOOL'

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The project included a pilot impact assessment that analysed the impact of teaching the GIE modules on anti-corruption, ethics and integrity on the ethical attitudes of students.

Pre- and post-tests were used to assess student's ability to form ethically correct responses to moral dilemmas. Students were given 7 scenarios with real life dilemmas where moral behaviour had a cost. 886 students in Mexico and Pakistan participated in the assessment.

The results of the impact assessments pointed to some interesting conclusions<sup>80</sup>:

1. The proportion of those with a high ability to identify ethical solutions (5 to 7 ethical responses) nearly doubled from 18% in the group that filled in the pre-test to 31% of the students who took the post-test. This result does not in itself demonstrate that the teaching was effective.
2. The proportion of students with a low ability to identify ethical solutions (providing ethically appropriate responses to 2 or less of the ethical scenarios) remained high even after the training. About half the students in the post-test still fell into this category. This suggests that there remains considerable scope to improve the impact of teaching-based interventions geared to improved ethical understanding.
3. Scenarios that involved bribery and cash payments received the lowest levels of ethically appropriate responses.
4. There were significant differences between the country outcomes. Mexican students were significantly better at identifying ethically appropriate responses than students in Pakistan, both before and after the training (although Pakistani student improvement after the training was greater). This points to the need to understand national contextual factors that drive these differences to align the localization of material more effectively.
5. Gender is relevant. Women generally performed better than men in the scenarios. This suggests that a more conscious gender approach could enhance the impact of GIE-type programmes going forward.
6. Students who had high value preferences for responsibility, integrity, truthfulness, and fairness/justice scored better in identifying ethical responses. This suggests that integrating a focus on these four values into ethics programmes may improve outcomes.

The impact assessments also explored student perceptions of the benefits of the GIE modules as taught by lecturers. More than 70 percent of students were positive or very positive regarding the relevance, increased ethical interest, short-term applicability, long-term applicability, methodology, integration and knowledge gain of the GIE programme.

Based on the programme data, engagements with lecturers and a brief literature review, we drew the following conclusions:

Pre- and post-training assessments of student abilities are a good practice that should be built into ethics and integrity education programmes as a general rule. They provide very useful information to lecturers regarding students' understanding and difficulties. They identify possible drivers of improved educational outcomes. They also function as an implicit incentive focusing lecturers on improving the impact of their teaching on student capability.

There is a need for deeper ongoing research into improving the impact of ethics and integrity training programmes on student attitudes, understanding and behaviour. This should include exploring how factors such as training duration, training content, integration of context and localization, delivery modes, gender dimensions and the establishment of ongoing support networks can be optimized to enhance the immediate and long-term impacts of the training. Future programmes should incorporate a research component that provides further insights into these questions. In addition, this tool will be enhanced through developing benchmarks for appropriate norms for post-training improvement.

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<sup>80</sup> UNODC Integrity Training Results Report Final (internal)

An important implicit assumption of the programme is that providing university students with sound ethics and integrity education before they enter formal employment in integrity-compromised work contexts, will empower a new generation to introduce more ethical awareness and behaviour into their workplaces. This proposition also needs to be explored through appropriate research. There is some evidence that this assumption might not be accurate, and that ethics education may have unintended negative effects in real-life scenarios.<sup>81</sup> This might imply that integrating more behavioural ethics into ethics education could be essential for improving its effectiveness.

It is important to note that the 'impact assessment' tool piloted in the programme is a tool for improving the quality of the training on an ongoing basis. It is not a tool that allows one to draw any conclusions regarding the impact of the GIE programme itself. GIE was focused on empowering universities to incorporate and/or improve ethics and integrity modules into their academic programmes and the core impacts relate to the extent to which this happened as well as whether such improvements in the teaching of ethics and integrity can be linked to longer-term improvements on the integrity performance of participating companies.

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81 Chaoping Li. The Effect of Ethics Education on Students' Ethical Decisions: A Preliminary Laboratory Experiment. *Journal of Finance and Accounting*. Vol. 11, No. 1, 2023, pp 14-18. <https://pubs.sciepub.com/jfa/11/1/2>

