INDEPENDENT IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

This evaluation includes the following projects/programmes:

Strategy for Strengthening Corruption Prevention Capacities in Mexico (MEXAB5)
Risks and Resource Allocation for Sustainable Development (MEXAD4)
Prevention and Countering Corruption Framework Program with the Mexican Government (MEXW26)
Public Budgets for Equal Development (MEXW41)
Combating Money Laundering through prevention and awareness raising (MEXW72)
Technical and Strategic Strengthening Program for the Prevention of Corruption in Mexico City (MEXZ95)
UNODC Global Integrity Education (GLOZ99)

May 2023
This independent evaluation report was prepared by an evaluation team consisting of: Ms. Camille Massey (Team Leader), Mr. Ernesto Velasco (Substantive Expert), Mr. Benjamin Santa Maria (Substantive Expert), and Mr. Renato Busquets (National Evaluator). 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 of projects. 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 of projects.

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Source of cover page images: UNODC Mexico; Contraloría del Estado de Jalisco.
# ABBREVIATIONS AND ACRONYMS

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<tr>
<td>CEB</td>
<td>UNODC’s Corruption and Economic Crime Branch</td>
<td>ROCOL</td>
<td>UNODC Regional Office in Colombia</td>
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<td>ENCIG</td>
<td>Encuesta Nacional de Calidad e Impacto Gubernamental</td>
<td>SAT</td>
<td>Servicio de Administración Tributaria</td>
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<td>FAFT</td>
<td>Financial Action Task Force</td>
<td>SFP</td>
<td>Secretaría de la Función Pública</td>
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<td>GAMI</td>
<td>Grupo Asesor de Monitoreo e Investigación</td>
<td>SHCP</td>
<td>Secretaría de Hacienda y Crédito Público</td>
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<td>INEGI</td>
<td>Instituto Nacional de Estadística y Geografía</td>
<td>ToC</td>
<td>Theory of Change</td>
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<td>INL</td>
<td>U.S. Bureau of International Narcotics and Law Enforcement Affairs</td>
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<td>IPN</td>
<td>Instituto Politécnico Nacional</td>
<td>UNCAC</td>
<td>UN Convention against Corruption</td>
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<td>IRM</td>
<td>UNCAC Implementation Review Mechanism</td>
<td>UNDP</td>
<td>UN Development Programme</td>
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<td>ITAM</td>
<td>Instituto Tecnológico Autónomo de México</td>
<td>UNWOMEN</td>
<td>UN Entity for Gender Equality</td>
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<td>ITEI</td>
<td>Institute for Transparency and Public Information</td>
<td>USAID</td>
<td>U.S. Agency for International Development</td>
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<td>MCCI</td>
<td>Mexicanos contra la Corrupción y la Impunidad</td>
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<td>LPOMEX</td>
<td>UNODC Office in México</td>
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<td>OHCHR</td>
<td>UN Human Rights Office</td>
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<td>Recommendations</td>
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<td>1. Further increase the strategic focus of technical assistance and seize opportunities for scaling up anti-corruption support to Mexican states: UNODC Mexico’s Area for Programming (i.e., Anti-Corruption Project Team), by building on UNODC’s innovative collaboration with Mexican States for the implementation of UNCAC recommendations at the State level, should develop a concept note for further increasing the strategic focus of technical assistance on anti-corruption to State-level counterparts. The concept note should be developed in consultation with Mexican States and pay special attention to identifying ‘quick win’ opportunities, based on the technical assistance needs expressed by counterparts (including those specified in the existing matrix drawn by UNODC Mexico) and available funding. (Expected timeframe for implementation: 6 months.)</td>
<td>Accepted</td>
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<td>2. Increase the focus on education to integrity for strengthening the sustainability of UNODC efforts on anti-corruption in Mexico: UNODC Mexico’s Area for Coordination, by building on the sound design, strong partnership building, and effective implementation of the GLOZ99 project, should increase its focus on education to integrity in higher education in partnership with the private sector, in consultation with the Regional Hub on Preventing and Countering Corruption and with the Corruption and Economic Crime Branch (CEB) in UNODC Vienna Headquarters. (Expected timeframe for implementation: 6 months.)</td>
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<td>3. Develop a full-fledged roadmap for future work on anti-corruption in Mexico: UNODC Mexico’s Area for Coordination should elaborate a full-fledged roadmap for UNODC’s future work on the prevention and fight against corruption and economic crime in Mexico, in consultation with the Regional Hub and CEB in HQ. The roadmap should be based on the analysis of the state of play in Mexico’s anticorruption landscape and the results and good practices of the evaluated projects, take into account the UNCAC recommendations stemming from the IRM (Annex VII), and specify how UNODC Mexico intends to support the Mexican authorities to fulfil these recommendations. (Expected timeline for implementation: 12 months.)</td>
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1 This is just a short synopsis of the recommendation, please refer to the respective chapter in the main body of the report for the full recommendation.

2 Accepted/partially accepted or rejected for each recommendation. For any recommendation that is partially accepted or rejected, a short justification is to be added.
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<th>Recommendations</th>
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<td>4. <strong>Strengthen partnerships and develop evidence-based, structured modular support on anti-corruption in Mexico, chiefly targeted to state-level entities:</strong> UNODC Mexico’s Area for Coordination should design a structured modular offer of support for corruption prevention efforts, chiefly targeted at State-level partners, in consultation with the Regional Hub and CEB in HQ. Building upon previous successful efforts at the State-level (e.g., peer-to-peer evaluation among States, support to CPCs, inclusion of anti-corruption in universities’ curricula), this “evidence-based menu” could include core support (e.g., basic training on UNCAC, peer review and peer support) and packages of add-on optional modules (e.g., support to CPCs, work in educational and higher education institutions, outreach to/sensitisation of vulnerable communities...), and lead to individual tailored agreements containing exit strategies. <em>(Expected timeframe for implementation: 24 months.)</em></td>
<td>Accepted</td>
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<td>5. <strong>Further invest in knowledge management and research:</strong> UNODC Mexico’s Area for Coordination should invest in knowledge generation and knowledge management to support a future portfolio on anti-corruption in Mexico, in consultation with the Anti-Corruption Project Team in the Country Office, as well as with CEB in HQ and the Regional Hub. To ensure adequate investment in knowledge management and research, in the development of a future portfolio, specific agreements should include and allocate resources to research and other evidence-generation activities (for instance, literature reviews), according to the nature and context of each project. <em>(Expected timeframe for implementation: 24 months.)</em></td>
<td>Partially accepted. Final results depend on available funding and are beyond COMEX control.</td>
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<td>6. <strong>Strengthen results-based management at the project level:</strong> In the design of a future portfolio on anti-corruption in Mexico, UNODC Mexico’s Area for Programming (i.e., the Anti-Corruption Project Team) should elaborate for each project a set of indicators at results level, with resources dedicated to monitoring and reporting results both at the output level and at the outcome level. Given the dynamic nature of the portfolio, attention should be paid to developing indicators that capture change over time, and which can be fine-tuned or retrofitted throughout implementation <em>(Expected timeframe for implementation: 24 months.)</em></td>
<td>Accepted</td>
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<td>7. <strong>Strengthen administrative communication and collaboration with UNODC Headquarters:</strong> UNODC Mexico (i.e., Areas for Programming and for Operations) should strengthen its communication and collaboration with the Division for Management (i.e. HRMS) and the Division for Operations (i.e. RSLAC) to better identify the challenges faced administratively as well as their root causes, and to propose solutions drawing from good practices and lessons learned from other Field Offices, with a view to strengthening procurement and administrative procedures as well as project management capabilities in UNODC Mexico. Special consideration should be given to options for packing items into larger contracts to minimize granularity. <em>(Expected timeframe for implementation: 24 months.)</em></td>
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INTRODUCTION

This independent in-depth cluster evaluation covers the group of projects in anti-corruption field, implemented in framework of cooperation between the Government of Mexico and UNODC.

CONTEXT AND CLUSTER INTERVENTION LOGIC

The Government and Mexico and UNODC base their cooperation on the 1996 Memorandum of Understanding and the 2003 Cooperation Agreement, which further defined its modalities. After initial projects as early as 2011, the fields of crime prevention and criminal justice were formally established as areas of collaboration in 2012, followed by a series of projects forming the UNODC anti-corruption portfolio. The complete project portfolio includes seven projects spanning the period from 2015 to 2023 and with the aggregate value of USD 6,650,944, derived from the variety of donors, including bilateral donors, Siemens, and Mexico’s national and State budgets.

The intervention was not based on a common theory of change, but rather an intention to mature the intervention from project-based efforts, building on the recommendations stemming from review of implementation the United Nations Convention Against Corruption UNCAC, to positioning as a technical assistance provider, followed by further diversification of the portfolio to reach more mature level of partnership at the Federal, State and Local levels, and ending with transformation into a strategic partner of the Government in anti-corruption. After analyzing the project documents and interviewing the UNODC Mexico staff, the evaluation team reconstructed the Theory of Change, using the UNCAC, the UNODC regional strategy, and the Regional Strategy of UNODC as guiding documents. The reconstructed ToC considers prevention, prosecution, and asset recovery as key blocks of the intervention logic, supported by dissemination and capacity building activities.

EVALUATION PURPOSE, SCOPE, INTENDED USE, AND METHODOLOGY

The purpose of this evaluation was to generate evaluative knowledge about UNODC’s anti-corruption work in Mexico to ensure accountability, entice institutional learning, and inform LPOMEXs decision-making in terms of project design, implementation, and future budget programming. The aim at the strategic level was to generate evaluative knowledge to inform institutional learning and guide strategic development and budget programming. The aim at the project level was to ensure accountability and inform implementation and programming. The evaluation criteria of relevance, effectiveness, and sustainability were complemented with a cross-cutting criterion focused on mainstreaming human rights, gender equality/empowerment of women and leaving no one behind. The report is intended to be used by UNODC management and project teams, donors, implementing partners and participants, points of contact in the government and non-State organizations.

Methodologically, the evaluation team used the mixed-methods approach, by combining qualitative data gathered through document review, interviews, and direct observation, with quantitative data obtained from survey and document review. The anonymized online survey targeted all beneficiaries of all seven scoped projects and contained questions to assess the changes experienced by the beneficiaries as a result of their participation in these projects. The interviews at the data collection phase approached a sample of informants from among the core learning partners, with questions related to each evaluation criterion. One of the projects was selected as the case study and dissected in more detail, since it was considered to best encapsulate the strategic approach of the country towards anti-corruption.

COMPOSITION OF EVALUATION TEAM

The evaluation team was composed of four persons. The female team leader, Camille Massey, with academic background in international law and public affairs and senior implementation and evaluation experience was
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assisted by two male substantive experts: Ernesto Velasco, Ph.D. in government and public administration, with extensive professional knowledge in transparency and integrity issues, and long evaluation experience; and Benjamin Santa Maria, educated in public policy, with extensive professional experience in programming, transparency and integrity. National evaluation expertise was enhanced by Renato Busquets, trained in public policy, with over a decade of local experience in economic and public policy issues.

MAIN FINDINGS

Relevance
Finding 1: The role of UNODC as guardian of the Convention underpinning the projects is acknowledged, and it has partially converted into reliance on the Office as a convener for anti-corruption actors. Finding 2: UNODC Mexico has pragmatically crafted its place in the anticorruption landscape of the country, by filling specific gaps and adapting to political shifts to support the implementation of the national policy framework. Finding 3: Overall relevance of UNODC projects and most activities on anti-corruption in Mexico is very high, but some activities could have been better tailored to intended users. Finding 4: UNODC Mexico has access to small niches within the National Strategy, focusing on prevention, but this support is not commensurate to the needs and potential demand for support on anti-corruption. Finding 5: The set of evaluated projects has not functioned as a structured portfolio, but as an aggregation of activities, which do not incentivise strategic management and strategic planning. Finding 6: The monitoring, reporting and learning efforts, within the portfolio and at organisational level, have been uneven. They do not contribute sufficiently to stakeholders’ identification of UNODC’s offer and comparative advantage.

Effectiveness
Finding 7. By transferring knowledge and know-how, benchmarking, and good practices to its anti-corruption partners, UNODC Mexico has created necessary conditions for harmonisation of the domestic regulatory framework with UNCAC, especially at the State level. Finding 8. UNODC acted as a catalyst for the implementation of the national anticorruption framework at State level through modelling and deployment of tailored tools. Finding 9. Through mechanisms based on the Convention, such as peer review and citizen participation UNODC has contributed to networking emerging anticorruption stakeholders. Finding 10. The limited data available suggests the emergence of new attitudes towards corruption and anti-corruption among certain target groups.

Sustainability
Finding 11. Given the complex and changing environment, UNODC’s business model, and the constraints presented by current funding agreements, ensuring the sustainability of UNODC’s work on anticorruption in Mexico is particularly challenging. Finding 12. The level of ownership towards the projects’ outcomes is uneven.

Human rights, gender equality, disability inclusion and leaving no one behind
Finding 13. Within the time scope covered by this evaluation, UNODC Mexico made sporadic efforts to include a human rights approach in the anticorruption projects, and to mainstream anticorruption from a human rights perspective throughout UNODC Mexico’s pillars, though with limited effects. Finding 14. The evaluation team found some anecdotal evidence of gender mainstreaming and leave no one behind approach at activity level. However, there is no evidence that project design is underpinned by gender or inclusion analysis, or that projects envisage gender/LNOB.

MAIN CONCLUSIONS

In a complex and changing environment, rather than fully developing a strategic and structured portfolio, the office undertook creative and innovative adaptation to carve out a space for UNODC’s anti-corruption efforts in Mexico (Findings 1, 2, and 3). Sustaining this approach in the longer run may be challenging, as shown by Findings 11 and 12. The innovative peer-review mechanism among Mexican States, pioneered and piloted by the portfolio under the MEXAB5 project, is highly relevant, perfectly suited to UNODC’s mandate, and
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extremely promising. It could be reproduced in other federal or highly decentralised countries – however, it requires agile project management and administration, as it multiplies the number of partners and entails complex logistics.

There is a need to re-think the portfolio management modality in such a way that incentives and contributions for cooperating with UNODC in anti-corruption field are clearer to the country stakeholders and partners, especially on sub-national level (Findings 1, 2, 4, 8, 9 and 11). As a result of this managerial re-thinking and re-positioning, the UNODC should be able to make a stronger case for new, proposed project interventions (Findings 2, 3, 6, 8, 9 and 11).

An important conclusion relates to the fact that the multiplication of partnerships and demand-driven activities, in an effort to remain relevant and visible in a complex and fluid environment, has stretched the office’s management capacity, which affected the standing of UNODC anti-corruption portfolio, especially at the Federal level. The office adapted to these changes by focusing on anti-corruption efforts at the State level. This shift has proved successful, but the sustainability of these interventions is vulnerable due to shortage of funding (Findings 1, 2, 4 and 11) and administrative constraints (Findings 1, 5 and 12).

The conclusions highlight importance of administrative strengthening of the office and the need for more strategic planning, backed up by the headquarters. The innovative GLOZ99 project could serve as a success story and a source of learning in its planning, implementation, monitoring and administrative approach.

MAIN RECOMMENDATIONS

RECOMMENDATION 1 – FURTHER INCREASE THE STRATEGIC FOCUS OF TECHNICAL ASSISTANCE AND SEIZE OPPORTUNITIES FOR SCALING UP ANTI-CORRUPTION SUPPORT TO MEXICAN STATES

UNODC Mexico’s Area for Programming (i.e., Anti-Corruption Project Team), building on UNODC’s innovative collaboration with Mexican States for the implementation of UNCAC recommendations at the State level, should develop a concept note for further increasing the strategic focus of technical assistance on anti-corruption to State-level counterparts. –Based on finding 7 (Effectiveness), and 11 and 12 (Sustainability). Expected timeframe for implementation: 6 months.

RECOMMENDATION 2 – INCREASE THE FOCUS ON EDUCATION TO INTEGRITY FOR STRENGTHENING THE SUSTAINABILITY OF UNODC EFFORTS ON ANTI-CORRUPTION IN MEXICO

UNODC Mexico’s Area for Coordination, building on the sound design, strong partnership building, and effective implementation of the GLOZ99 project, should increase its focus on education to integrity in higher education in partnership with the private sector, in consultation with the Regional Hub on Preventing and Countering Corruption and with the Corruption and Economic Crime Branch (CEB) in UNODC Vienna Headquarters. –Based on findings: 1, 2, 4 (Relevance), and 11 (Sustainability). Expected timeframe for implementation: 6 months.

RECOMMENDATION 3 – DEVELOP A FULL-FLEDGED ROADMAP FOR FUTURE WORK ON ANTI-CORRUPTION IN MEXICO

UNODC Mexico’s Area for Coordination should elaborate a full-fledged roadmap for UNODC’s future work on the prevention and fight against corruption and economic crime in Mexico, in consultation with the Regional Hub and CEB in HQ. The roadmap should be based on the analysis of Mexico’s anticorruption landscape, the results and good practices of the evaluated projects, and the UNCAC recommendations stemming from the IRM. –Based on findings 1, 2, and 5 (Relevance), and 11 and 12 (Sustainability). Expected timeframe for implementation: 12 months.
RECOMMENDATION 4 – STRENGTHEN PARTNERSHIPS AND DEVELOP EVIDENCE-BASED, STRUCTURED MODULAR SUPPORT ON ANTI-CORRUPTION, CHIEFLY TARGETED TO STATE-LEVEL ENTITIES

UNODC Mexico’s Area for Coordination should design a structured modular offer of support for corruption prevention, chiefly targeted at State-level partners, in consultation with the Regional Hub and CEB in HQ. Building upon previous successful efforts at the State-level (e.g., peer-to-peer evaluation among States, support to CPCs, inclusion of anti-corruption in universities’ curricula), this “evidence-based menu” could include core support and packages of add-on optional modules, and lead to individual tailored agreements containing exit strategies. –Based on findings 1, 2, 4 (Relevance), 8 and 9 (Effectiveness), and 11 (Sustainability). Expected timeframe for implementation: 24 months.

MAIN LESSONS LEARNED AND BEST PRACTICES

Lessons learned: A lesson learned from MEXAB5 project is that **tight earmarked financing mechanisms may overstretch management capacity, especially in contexts where swift adaptation of strategic partnership is required.** UNODC must carefully consider the scope of its projects to be able to fulfil its commitments in a timely and effective way. Adapting to political shifts through new partnerships can only work if the project’s financial arrangements with donors, as well as management and administrative infrastructure, are able to back this transition up. Better strategic planning, process assessments and responsible tie-off activities are future improvement areas, if UNODC is to retain its relevance in a complex political environment in Mexico, with a spread at the State and municipal levels. Another lesson learned –from both MEXW26 and MEXAB5— is that **HQ need to invest in providing thematic backup for solid, intelligible programming, otherwise the portfolios may become vulnerable.** Limited support from HQ in research and portfolio design has curtailed the ability of the Mexico office to capitalize on the UNODC “products of excellence,” based on the UNCAC and UNODC’s anti-corruption mandate. Without such up-front investment, the field office faced a conundrum – the salaries are tied to projects, the office gravitates towards demand-driven approach to ensure maximum funding to keep staff, which may come at the expense of strategic reflection and strategic programming.

Best practices. A good practice was identified in project MEXAB5: **innovative use of the UNCAC, as adapted to a federal country.** Over the years, UNODC has been able to use its neutral role as a guardian of the UNCAC to network anti-corruption peers from various States thanks to a highly innovative idea: the transfer to the inter-State level (i.e., within Mexico as a federal country) of the UNCAC international peer-to-peer review mechanism. This highly innovative approach enabled the UNODC and its partners to adjust the framework of the UNCAC to a federal context, thus ensuring relevance to the Convention, to the constitutional and legal framework of Mexico, and to the needs of the citizens as end beneficiaries, who mostly depend on State-level institutions to be protected from corruption. Another **good practice, from GLOZ99, also practiced in the MEXAB5, involves the networking of the energy and pharmaceutical companies with universities (GLOZ99), and developing ties between universities, civil society, and private sector with government agencies in five states (MEXAB5), to set up the basis for compliance and good practices in the private sector based on the UNCAC. This effort was supported by private sector donor – Siemens – while the project was developed through the headquarters support, giving it both innovative character and a strategic cutting edge. These good practices are highly reproductible to other federal and/or highly decentralised countries. It would have been impossible for any other actor, but UNODC in the capacity of guardian of the Convention
I. INTRODUCTION

BACKGROUND AND CONTEXT

In 1996, the Government of Mexico and the Governments of Central America, through their embassies accredited in Mexico, signed a Memorandum of Understanding (MoU) through which they committed to work together with UNODC to address drug and crime problems in the region. The MoU was the precedent for UNODC and the Government of Mexico to enter into a Headquarters agreement for the establishment of the Regional Office for Mexico and Central America in 2003. In 2008, a Cooperation Agreement was signed establishing the modalities of cooperation between UNODC and Mexico. With a new agreement in 2012, Mexico granted the UNODC Office in Mexico (LPOMEX) the functions of a Liaison and Partnership Office that coordinates its work with the Ministry of Foreign Affairs (SRE) and the Attorney General Office (FGR). The purpose of the LPOMEX has been the development of country-specific solutions focused on crime prevention and criminal justice.

2011 marked the formal beginning of UNODC anti-corruption portfolio in Mexico. Following ad hoc advisory services provided by UNODC to the Ministry of Civil Service (SFP, which rules the internal control and audit procedures at the Federal government), as well as the planning and implementation of mechanisms for the prevention of corruption, the portfolio gradually expanded.

Taking into consideration that corruption is a multi-dimensional phenomenon that consequently would require a multi-layered approach, the Mexican Government and UNODC agreed to the design of the Prevention and Countering Corruption Framework Program (MEXW26), a US$ 920,047.27 joint UNODC-UNDP first ‘umbrella project’ combining key components aligned with the UNCAC’s provisions. At the date of the evaluation report, this budget cap was not yet reached although six different donors contributed, and the project remained open. Largely, the ‘umbrella project’ was meant as an over-arching programme to provide technical assistance to the Federal and later to sub-national governments, to monitoring and the strengthening of capacities in curbing corruption.

Five more projects took off later setting new precedents in UNODC’s involvement. This suite of projects set the trajectory of UNODC’s anti-corruption portfolio, which culminated with the launch of a larger, more strategic United States Agency for International Development (USAID)-funded follow-on project for Strengthening Corruption Prevention Capacities in Mexico (MEXAB5).

The complete portfolio therefore includes:


- **Technical and Strategic Strengthening Program for the Prevention of Corruption in Mexico City** (MEXZ95), implemented from September 15th, 2016, to September 15th, 2018 (with a remaining balance, to close in 2023), worth $567,712.00 and funded by Mexico City General Comptroller Office, and the British Embassy in Mexico (UK Embassy).

- **Prevention and Countering Corruption Framework Program with the Mexican Government** (MEXW26) implemented between July 5th, 2017 and to close in 2023 (with a remaining balance), worth $434,372.80 and funded by the Tax Administration Service (in Spanish, Servicio de Administración Tributaria, SAT at the time, now replaced by the Agencia Nacional de Aduanas); Ministry of Treasury of the Federal Government (in Spanish Secretaría de Hacienda y Crédito Público, SHCP); USAID through the United Nations Development Programme in Mexico (UNDP Mexico); Ministry of Public Administration of Zacatecas (In Spanish, Secretaría de la Función Pública del Estado de Zacatecas); Executive Secretariat of the National Anticorruption System (Secretaría Ejecutiva del Sistema Nacional Anticorrupción); and the United Kingdom and Northern Ireland Embassy in Mexico (UK Embassy).
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- **Combating Money Laundering through prevention and awareness raising** (MEXW72), implemented from October November 1st, 2018, and October 31st, 2021 (closed), worth $1,235,537.00 and funded by The Mérida Initiative via the US State Department, Bureau of International Narcotics and Law Enforcement Affairs (INL).

- **Public Budgets for Equal Development** (MEXW41), implemented from June 14th, 2018, to close in 2023, worth $2,272,000.00 (about 1.6 million were spent) and funded by the Ministry of Finance of the State of Nuevo León.

- **UNODC Global Integrity Education** (a segment of the global programme GLOZ99). This segment is hereinafter referred to as GLO299 for ease of reference, implemented from October 2019 to close in September 2023 (following a recently approved extension), initially worth $162,403.20 for its implementation in Mexico and funded by Siemens.

- **Strategy for Strengthening Corruption Prevention Capacities in Mexico** (MEXAB5) implemented since October 1st, 2019, and planned to end on January 31st, 2023 (active), worth $1,600,000.00 and funded by the USAID.

These projects evidenced UNODC’s ability to work on specific thematic areas such as preventive educational activities in schools, integrity policies in the private and public sectors, integrity in sports, anti-money laundering (AML) and corruption measurement. It also enabled UNODC to pilot strategic support and peer-to-peer mechanism review at the sub-national level, first in the Ciudad de Mexico and Nuevo Leon States, and then in a total of 32 States.

CROSS-CUTTING ISSUES: HUMAN RIGHTS, GENDER EQUALITY, AND INCLUSION DIMENSIONS OF ANTI-CORRUPTION IN MEXICO

On the one hand, human rights, gender equality and inclusion are difficult dimensions to measure in detail, and the available statistics do provide targeted data which would enable to measure the exact human rights impact of corruption, even in comparison to other countries with similar socioeconomic characteristics. On the other hand, the National Statistical Institute (Instituto Nacional de Estadística y Geografía de México -- INEGI) conduct bi-annually the National Survey on Government Quality and Impact (ENCIG) to measure the level of corruption in public services. According to this survey, the prevalence rate of corruption increased from 12,080 victims per 100 thousand inhabitants in 2013, to 14,701 in 2021.

Corruption in Mexico has become widespread in recent decades that it inevitably affects virtually every household in the country—whether directly or indirectly. This includes vulnerable populations, who often find themselves defenseless from the abuse of power in which authorities at different levels engage. Recent research publications documenting this issue are scarce. According to a study by *Mexicanos Contra la Corrupción y la Impunidad* (MCCI) as funded by USAID, social programs destined to serve the poorest have increasingly become the target of corrupt practices, usually tying the provision of social benefits—which these groups are entitled to—personal, financial, or political benefits. Moreover, a state of vulnerability will frequently indicate that information is scarce or limited, meaning that these groups will more often than not find themselves not knowing they’re being victimized by authorities and officials, and even less so in the position to not take part of corrupt practices. The study by MCCI proposes that those citizens who are aware of their rights and the legal mechanisms at their service are more likely to refuse engaging with a corrupt official. Data from the INEGI survey show that the population is overwhelmingly dissatisfied with public services. Those that are worse evaluated, such as public elementary education and public sector health services, tend to be also those with more complaints and human rights readdress procedures ongoing. In many cases, corruption contributes to diminished public services’ quality, causing disproportionate damage to the poor and vulnerable.

Women are affected differently by corruption and impunity than men. According to Transparency International, given their regular status as primary caregivers of the household, women tend to interact more

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with authorities and public institutions who provide public services, finding themselves repeatedly at risk of potential coercion and intimidation. However, women face particular risks of their own when in a situation of abuse of power: sexual corruption. Thus, public officials might demand “payment” in the form of sexual services in exchange for, basically, fulfilling their duties. As in the case with other at-risk populations, being in a vulnerable position will mean that women are left defenseless to the abuse of corrupt authorities, though their implications can be more severe. Results from the ENCIG (2021 Version -- Corruption Experience Tab) indicate that there was a statistically significant difference according to the sex of those who experienced corruption acts: women are more likely to be affected negatively. However, the real dimension of the problem in the case of women cannot be assessed by the survey’s data, as gender roles put them in a more vulnerable position to speak up or too afraid to report their experiences with regard to corruption.

**INTERVENTION LOGIC**

There is a set of insights about how to address the issue of anti-corruption in Mexico, which has evolved, and has materialized during the project cycle. It should be noted that, as is often the case in UNODC interventions, funding constraints did not enable UNODC Mexico to design its anti-corruption portfolio (i.e., the cluster of 6 projects and one global programme segment) from the outset based on a unified Theory of Change (ToC). Rather, it sought to respond to the needs identified through the international review mechanism (IRM) of the UNCAC and the corresponding recommendations. For this reason, projects should not be considered as a consolidated strategy. A possible maturation pathway of the anti-corruption strategy can be described in four periods, derived from chronological events and interviews with different stakeholders:

- at the beginning of the evaluated period, there was an effort to position UNODC on the anti-corruption landscape in Mexico as an international organization that may deliver technical assistance, based on the implementation of recommendations stemming from the review of the UNCAC, and through a thematic grouping focused on prevention (transparency, open government, public integrity, anti-money laundering, and asset recovery),
- a first generation of projects (‘umbrella project’ and other, ad-hoc projects) was developed to facilitate the diversification of the portfolio, starting with the preparation of technical and financial proposals for donors (international, and both Federal and State-level beneficiaries of technical assistance services),
- once the first generation of projects is completed, UNODC would become a recognised technical assistance and implementing partner for the Federal government, sub-national governments, and key international donors; and
- ideally, this pathway would culminate in a fourth period, where UNODC would become a strategic partner in anti-corruption and available to develop strategy-driven projects and pooling funds from various local and international sources as to achieve common goals.

However, the transition between those 4 periods faced implementation and sustainability challenges. In the first case, it was necessary to engage teams of experts and set up institutional relationships (international, government and non-government partners). These requirements were met, thus UNODC was able to position itself and appeal for funding for the first generation of projects. The transition from the second to the third period was not fully achieved, as most of the interviewees considered that the complexity of project implementation (planning, staffing, contracting, disbursements, and monitoring) exceeded the installed capacity of UNODC field office. The desk review also pointed out to several instances of delays and requests for extensions of the execution period, partly due to the challenges posed by the COVID-19 pandemic, and partly due to other internal and external challenges. This situation has jeopardized the implementation of activities, compliance with technical and financial calendars, and, to some extent, the achievement of results, the relationship with donors, and the portfolio’s sustainability.

The transition from the third to the fourth period would require confirming the topics that could expand the thematic agenda as well as the network of technical and financial partners. The latter would not materialize in 2023 because (i) project implementation is still active (there are projects with available balances, not closed;
projects with implementation extensions due to delays of numerous reasons; and active projects), (ii) an agreement has not been reached with Mexican Federal Government (which approves international cooperation initiatives) that allows balancing the response to specific demands and the general achievement of objectives and impacts, as to reducing a fragmented investment; and (iii) the current political context constrained UNODC’s margin of action in terms of the anti-corruption portfolio, particularly at the Federal level. The final reports of the MEXAD4 and MEXAB5 projects, published after the completion of this evaluation’s data collection period, specify that the projects and their scheduled activities were completed in the last few months of these projects.

It is worth noting again that the UNODC office in Mexico has not articulated an overarching ex ante ToC for the anti-corruption portfolio. However, the MEXAB5 project’s ToC appears as the most elaborate way to capture UNODC’s approach to anti-corruption in Mexico. By confronting the ToC of this project with UNCAC and corresponding recommendations, within the context of the UNODC Strategic Vision for Latin America and the Caribbean, within the framework of the UNCAC, and complemented with additional elements contained in the other six projects, the evaluation team was able to reconstruct ex post, if not a full-mature ToC, at least an overview of UNODC’s approach to supporting Mexico’s anti-corruption efforts.

During the inception period, based on inception interviews with UNODC in Mexico’s staff who have an overview of the entire portfolio, and on the review of the entire project documentation, and using the Regional Strategy of UNODC as a guiding document, the evaluation team reconstructed a ToC of the portfolio. LPOMEX staff has confirmed the validity of the ToC below, and the diagram below synthesizes it. It outlines the types of inputs that UNODC, supported by donors/funding sources, has generated; it identifies the key outputs and which projects have contributed to them; it identifies the expected results in terms of changes among the anticorruption stakeholders; it links these outputs to outcomes, impacts, and ultimately overall purpose.
**Figure 1: Reconstructed Theory of Change of the portfolio**

Source: Theory of Change workshop with personnel of UNODC in Mexico’s staff.
As regards the type of project, there were 4 types of the first generation. First, full-fledged projects developed by key international donors, where UNODC was invited to participate as implementing partner, for instance, by the U.S. development agencies such as USAID and INL (MEXAB5, MEXW72, respectively). The second type of project was named as ‘umbrella project’, a series of activities aligned with international donors’ local priorities (MEXW26 and MEXAD4). The third type of project was requested and funded by the beneficiary government institutions (continuation of MEXZ26, MEXW41 and MEXZ95), a sort of fee-for-service agreement (for instance, the Federal Customs Agency, the Comptroller of Mexico City’s Government, and the Nuevo Leon Government’s results-based budgeting). The fourth type of project (GLOZ99) was designed at UNODC’s headquarters in Vienna to be implemented in three countries, Kenya, Mexico, and Pakistan, simultaneously.

The full portfolio is described in Annex V (Project summaries).

EVALUATION PURPOSE, SCOPE, AND INTENDED USE

EVALUATION PURPOSE AND USERS

The purpose of this evaluation is to generate evaluative knowledge about UNODC’s anti-corruption work to ensure accountability, entice institutional learning, and inform LPOMEXs decision-making in terms of project design and implementation and future budget programming in coordination with government authorities.

The key stakeholders of the evaluation are primarily the core learning partners who will use the evaluation report, divided into the following categories:

- UNODC project teams and UNODC management,
- Donors,
- Implementing partners, counterparts, and participants to projects’ events and networks/platforms facilitated by the projects (e.g., trainings, roundtables, peer-to-peer events, study visits...),
- Points of contact of the projects in the respective institutions, CSOs, private companies, academic institutions either national or international,
- Other project beneficiaries having directly interacted with the project, for instance by receiving advice or co-implementing an activity, and
- Citizens at large, target groups of information campaigns.

EVALUATION OBJECTIVES

The objectives of this evaluation are two-fold:

- At the strategic level, the evaluation should generate evaluative knowledge informing institutional learning, strategy development, and budget programming, and
- At the project level, explored through a case study, the evaluation must ensure accountability and inform implementation and future programming.

The evaluation is therefore both summative and formative. Because UNODC’s anti-corruption portfolio in Mexico amounts to a broad intervention supporting strategic changes envisaged by Mexico and by UNODC at the regional level, the evaluation will use contribution analysis: it will analyse the most significant contributions, intended or not, which were achieved by the portfolio to the various strategic pillars of an anti-corruption strategy. The evaluation will seek to identify learning from the factors, both internal and external which made these contributions possible, or which curtailed them.

EVALUATION CRITERIA

Relevance: this criterion will focus on the convergences between (i) UNODC’s mandate and strategic objectives, (ii) Mexico’s anti-corruption policy framework, and (iii) the needs/demands as expressed by the beneficiaries and assessed through evidence generation. Under this criterion, the evaluation will check
whether the ToC of the portfolio is compatible with all three, whether it is relevant to its stated objectives, and whether it has managed to adapt to changes and emerging issues. It will further check the realisation of assumptions at the corresponding level of the ToC.

**Effectiveness:** this criterion will focus on the changes effectively generated by the portfolio and check these changes against the ToC. The evaluation will highlight the most significant changes under the respective result areas identified in the reconstructed ToC. The evaluation will further identify the conducive or impeding factors which determined these changes and check the realisation of assumptions at the corresponding level of the ToC.

**Sustainability:** this criterion will focus on the conditions necessary for the changes described above to be sustained in the long run, which in turn determines the likelihood of future impact. These conditions are deemed to be identified in the ToC as assumptions at the highest level.

**Human rights, gender equality and empowerment of women, and leaving no one behind:** this criterion will focus on the mainstreaming of these three cross-cutting issues in terms of (i) project design and corresponding analysis; (ii) incidences of reported changes analysed through these lenses. However, the evaluation will not assess the impact of the project on specific categories, as the sample of data gathered would most likely not be representative once disaggregated per category (except possibly as regards gender disaggregation of survey data – but this would not allow sufficient triangulation). Instead, the evaluation will identify such instances of changes and check their relationship with an intention in the project design, and with the portfolio’s eventual human rights-centred/gendered/LNOB analysis.

The evaluation will not assess separately the efficiency, coherence, and impact criteria. Rather, it will analyse coherence issues as a part of the intervention’s relevance to the context and to UNODC’s strategic guidance, examine efficiency issues as possible enabling or constraining factors towards effectiveness, and make inroads into the plausibility of future impact because of the findings on effectiveness and sustainability.

**COMPOSITION OF THE EVALUATION TEAM**

Camille Massey, Team Leader, female, Master’s in international law and public affairs, 20 years of experience in programming, implementation and monitoring and evaluation of international cooperation interventions in rule of law, human rights, and democracy. Certified evaluator and evaluation leader since 2006.


Benjamin Santa Maria, Substantive Expert, male, Master’s in public policy, 22 years’ experience with operations of multilateral development banks in 17 countries, and was team member of the Transparency and Integrity Cluster as Senior Specialist of the Inter-American Development Bank’s Headquarters in Washington, D.C.

Renato Busquets, National Evaluator, male, Master’s in public policy, over 10 years of experience in economic and public policy issues. Worked as a consultant in the World Bank’s Open Government unit. Has participated in the evaluation of development projects in Mexico funded by international donors.
MAP OF THE INTERVENTION

Figure 2: Political map of Mexico, with States. Source: INEGI

EVALUATION METHODOLOGY

The evaluation used a mixed-methods approach, combining ample and rich qualitative data (documents, interviews, direct observation), and quantitative data (survey and documents).

DOCUMENT REVIEW

During the inception phase, the evaluation team already performed a first review of the documentation shared by LPOMEX. In particular, the evaluation team analysed the project documents of the 7 projects to prepare project briefs and cross-checked the information from the project documents with the most recent available both semi and annual monitoring reports and the information contained in the terms of reference (ToR) of the evaluation. During the data collection phase, the evaluation team further analysed this documentation, according to the following sequence:

1. Analysis of project design documents and progress reports,
2. Reconstruction of the logic of intervention at a portfolio level,
3. Identification of key stakeholders and potential informants, and
4. Preliminary identification of significant contributions at the project and portfolio level.

Document review yielded both qualitative data (narrative sections) and quantitative data (statistics gathered by UNODC, statistics and indexes generated by other publications such as reports of civil society organizations (CSOs), other international organisations, and the Mexican Government). Document review also covered the entire portfolio, with special focus on MEXAB5 project, which was selected at the inception phase for being the object of a case study.

SURVEY

Immediately after the approval of the inception report for this evaluation, the evaluation team with the support of the UNODC team, deployed a survey targeting all direct beneficiaries of the seven projects. The survey aimed at reaching the most direct beneficiaries of the portfolio’s project, in order to:

- Additionally review (as initial review was performed during the inception phase) the key outputs (e.g., manuals, publications, research products) and events (e.g., trainings, roundtables, peer-to-peer events,
other sessions) of the seven projects, and identify those whose participants could be included in the pool of respondents,

- Solicit the email addresses of all participants and users of the selected outputs and events,
- Eliminate double entries, and review and compare the respective number of email addresses per project, to identify possible bias in the representation of the respective projects (e.g., over-representation of a project compared to the map and number of stakeholders),
- If necessary, solicit extra respondents’ email addresses from LPOMEX for the under-represented projects, and
- If necessary, re-balance the representation of the respective projects by randomly suppressing addresses for the projects still significantly over-represented.

The survey questionnaire was distributed in Spanish, and structured as follows:

1. A common Entry Page “About yourself”, which enabled the team to disaggregate and compare results based on general characteristics. This enabled gender disaggregation, as well as respondents to identify themselves according to a category of stakeholder (see Survey Paths below),

2. A substantive page (with different paths for different categories of beneficiaries, such as projects’ points of contact/training participants/other events’ participants/recipients of advice/participants in peer-to-peer network). This page explored the changes experienced by the respondents in terms of:
   - Availability and use of normative framework,
   - Availability and use of tools and methodologies,
   - Functioning of new mechanisms (including peer-to-peer), and
   - Knowledge, know-how, attitudes, and behaviours because of participation in the project.

3. A common Closing Page about the respondents’ perceptions of UNODC, its events and products (quality, user-friendliness, appropriateness to context...)

The survey used the Team Leader’s SurveyMonkey business package. The Team Leader activated the function “Anonymise Responses” ensure complete anonymity: this made technically impossible to trace any response to a person, name, location, or IP address. The function preventing several responses from the same device was also activated, so that respondents could only open the link once (avoiding multiple entries).

The survey covered the case study and other projects in an even way.
Annex IV presents an initial draft questionnaire.

**SEMI-STRUCTURED INTERVIEWS**

During the inception phase, the evaluation team already interviewed all UNODC Mexico staff whose position, institutional memory and experience offer an overall view of the portfolio. These interviews were used to obtain an overview of the portfolio, to identify key evaluation questions, and to test future interviewing techniques.

During the data collection phase, the evaluation team used deep interviewing techniques, focusing the interviews on:

- The relevance of the portfolio and its components,
- The most significant changes identified by the informants as an immediate result of the projects,
- The changes experienced or observed by the informants in the normative framework, individual capacity (knowledge, know-how, attitudes, and behaviours), and institutional capacity (mechanisms and processes, information), to which the portfolio may have contributed,
- Institutional relations and partnership management, in particular issues related to the adequation between the support offered, the demands of specific counterparts, and other needs identified by the informants, and
- Ownership, sustainability, and future conditions for lasting change that need to be met.

The evaluation team sought to interview a sample of informants from among the core learning partners identified by the ToR and beyond.
CASE STUDY:
The project MEXAB5 is the only strategic project in the portfolio, in the sense that its approach encapsulates most of the overall approach of the country towards anticorruption. Therefore, and as presented during the inception interviews, the findings on the MEXAB5 tend to be representative, at times in a amplified fashion, of some trends in most of the portfolio.

The original design of the MEXAB5 project was based on the main recommendations resulting from the UNCAC International Review Mechanism (IRM) for Mexico. Based on this, in consultation with the SFP, and in agreement with the donor, four key topics from the IRM were covered by MEXAB5 project. The MEXAB5 project, which was still ongoing at the time of data collection, and which had a broad geographic span, also enabled the data collection process to engage key informants from various levels of governance and from diverse States of Mexico, including in areas of the country which are economically less privileged. The case study thus enabled the evaluation to engage a broader spectrum of learning partners with differing challenges, to hear their voice, and to increase the likelihood of ownership for the recommendations.

In line with the above, the case study explored the entirety of the evaluation matrix, and it was used as a deep dive to respond to all evaluation questions. The case study methodology used the entire range of data collection tools and procedures, but with a higher sampling than for other projects of the portfolio.

LIMITATIONS TO THE EVALUATION

<table>
<thead>
<tr>
<th>Limitations to the evaluation</th>
<th>Mitigation measures</th>
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<tbody>
<tr>
<td>Lack of data on projects which were closed before the start date of the evaluation. Under-representation of these projects in the data set (key informants in particular) and therefore possibly in the findings, undermining the “cluster approach” to the evaluation.</td>
<td>Theory of change workshops extended to all project staff/former staff still present in UNODC, to reconstruct the place of “older” projects in the ToC. Solicitation of UNODC Mexico Office to trace partners of these projects, extension of the survey to these partners, thorough review of the documentation including projects’ outputs.</td>
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<tr>
<td>Limited opportunities for direct observation of project activities.</td>
<td>Observation of two project events. Coverage of satisfaction vis-à-vis project activities in the survey. Key informant interviews with beneficiaries and partners focusing, inter alia, on UNODC’s deliverables and activities, and their results.</td>
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<td>Long delays between the finalisation of the evaluation planning, and facilitation by UNODC Mexico of field visits and interviews (travel arrangements, introduction of evaluation and evaluation team to the informants), leading to last-minute logistics and unavailability of informants, and in on instance unavailability of travel options (flights).</td>
<td>Online interviews beyond the envisaged dates and the field visits. Evaluation team also requested clearance to directly contact interviewees without awaiting initial introduction by UNODC Mexico staff and volunteered extra working days to perform additional follow up and gain access to informants. One travel arranged by UNODC Headquarters: one travel involving only evaluation team leader. Dispatching of the Evaluation team to cover more interviews beyond the field mission.</td>
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<td>Mandate of the evaluation limited to the performance of UNODC Mexico office, whereas</td>
<td>Validation of findings with geographic, thematic, budgetary and finance informants in interviews with</td>
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<td>Headquarters support soon appeared as a key factor for UNODC Mexico performance.</td>
<td>headquarters. Solicitation of documentation from headquarters.</td>
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<td>Unavailability of some staff in UNODC Mexico to participate in evaluation activities (ToC reconstruction in particular), and unavailability of documentation (at the time of data collection and analysis) in the case study project.</td>
<td>Validation in writing, ToC workshop in situ open to all staff of the portfolio, interviews with former staff members, interviews with portfolio’s staff at all levels. Repeated requests for documentation, including to UNODC Mexico Office leadership. Some documentation obtained through Headquarters. Some limitations subsisted.</td>
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<tr>
<td>Significant amount of documentary evidence regarding ongoing projects unavailable by the end of data collection and analysis phase (e.g., final reports, final financial reports, some beneficiary data).</td>
<td>Integration of additional information provided by UNODC Mexico during report review period.</td>
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II. EVALUATION FINDINGS

RELEVANCE

EVALUATION QUESTIONS:
1. To what extent was the portfolio in line with the distinctive role of UNODC in Mexico?
2. To what extent was the portfolio relevant to, and fit for its purpose?

FINDING 1: THE ROLE OF UNODC AS GUARDIAN OF THE CONVENTION UNDERPINNING THE PROJECTS IS ACKNOWLEDGED AND HAS PARTLY CONVERTED INTO RELIANCE ON THE OFFICE AS A CONVENER FOR ANTI-CORRUPTION ACTORS.

Since the start of the first project of this portfolio (MEXZ95 in 2016), the UNODC in Mexico has progressively capitalized on its mandate as a guardian of the UNCAC. All projects in the portfolio are anchored in the provisions and mechanisms of the Convention. They are therefore relevant to UNODC’s mandate and strategic vision. Interviews with UNODC staff in headquarters and in Mexico show that the Convention serves as the compass for the design of individual projects and is the reference against which staff assess the relevance of their portfolio. However, during the assessed period, UNODC did not have an overall organizational strategy which would support the implementation of the Convention, against which the portfolio’s relevance could be assessed, or based on which the Mexico office team could have developed its own, country-specific strategy to support anticorruption efforts, including a vision of specific systemic change for a period of time. For instance, the UNODC Strategy 2021-2025 was not yet available when the portfolio’s projects were designed.

Even this document, which highlights five priority areas, does not fully respond to the need for programmatic guidance in a country office. The strategy envisages five avenues of action and a set of outcomes and related intermediate results, not explicitly linked to the avenues. However, the strategy does not unpack the links between this broad results framework and the context in which UNODC may operate, nor does it provide methodological guidance on how to programme for anticorruption, how to engage partners in the country, or on how to link anticorruption initiatives to other thematic areas. The staff in UNODC Mexico explained that, even if this results framework had been available when the portfolio’s projects were designed, this would not have constituted sufficient guidance and programming methodology.

Instead, UNODC has gradually developed regional vision documents, which contain an anti-corruption section. But this is a recent effort, which has built upon the existing experience at country level (and on the Convention) and the UNODC Strategy 2021-2025 rather than the opposite. The UNODC Strategic Vision for Latin America and the Caribbean 2022-2025 contains most of the components which have been addressed by UNODC Mexico – and, reportedly, by other Offices such as ROCOL. The UNODC in Mexico’s anticorruption portfolio is therefore fully aligned with the regional strategy, but post-factum.

The evaluation’s survey results show that UNODC’s mandate is appreciated by the counterparts: the ability to channel international standards is one of the most often quoted advantages of UNODC (33.50% respondents, which is a very high percentage in such survey), just behind very concrete benefits (public sensitization and transfer of knowledge, which classically form the bulk of appreciated benefits in similar surveys). Association with internationally agreed standards, which Mexico has subscribed to, makes the UNODC office a comparatively more acceptable partner to work on such a sensitive topic as corruption. Interviewees from among national partners, donor community, and State-level civil servants concur on this point. Respondents to our survey first quote Mexico being party to the UNCAC, by far, as the first distinctive trait of UNODC compared to other international partners (37,56%). Because the national normative framework (policies, legislation, regulations) strives for compliance with the UNCAC, the UNODC Mexico Office’s use of UNCAC as a basis for project design has further contributed to alignment and relevance: the UNCAC guides UNODC in
focusing on upcoming reforms. This is further in line with UNODC’s strategic vision for the region: Mexico is not viewed as a beneficiary country, but as a partner whose national strategies can be supported. Two workshops observed by the evaluation team illustrated the relevance of tying project activities with the UNCAC: trainers and participants consistently reiterated the importance of UNODC’s mandate and expertise related to the Convention, and the ties with the national and State-level normative framework.

The UNODC Office in Mexico derives further added value from its role under the Convention, and more generally from belonging to the United Nations System. Mexican counterparts largely perceive it as politically neutral, which is a rare and precious comparative advantage, especially in contrast with bilateral cooperation actors (e.g., bilateral development agencies). In connection with this, the Mexico Office as a whole, and its staff, are also perceived as integrous. When asked about the three words they associate with UNODC in Mexico’s anticorruption action, “honesty” is one of the most often quoted (just behind capacity building and support, which are very classical, immediate benefits most quoted in this type of surveys): this is unusual and noteworthy.

UNODC’s role as depository for the UN anti-corruption mandate, including the implementation of UNCAC further evoke knowledge in the perception of the counterparts. For instance, UN branding (though not UNODC in particular) is seen as added value of the Office’s products (publications, toolkits) and training certificates. However, funding constraints and the associated staff turnover prevents the Office from optimizing the added value of all these comparative advantages, because some of the knowledge and recognition is lost with every staff reshuffling. This concern was expressed by UNODC staff and is also perceptible in survey results: only 6.09% respondents consider the dedication of the staff as a distinctive feature of UNODC. This is relatively low for such survey and should be contrasted with mostly positive feedback received during interviews regarding the amount of work executed by UNODC staff. This suggests that counterparts see UNODC staff as hard-working and knowledgeable, but not steady.

Respect for the UNODC’s mandate and knowledge has partly, but not fully, converted into reliance on the Office as a convener for anti-corruption actors. The survey results show that, while most respondents agree that the portfolio has put them in contact with other anti-corruption actors, or that it has networked or included a variety of anti-corruption actors, there is also a significant number of dissenting voices about these statements. In interviews, informants at the Federal level often minimized the convening role of UNODC, as opposed to State-level interlocutors. Civil society representatives were split.

Over the years, UNODC has been able to use its neutral role as a guardian of the UNCAC to network anti-corruption peers from various States thanks to a highly innovative idea: the transfer to the inter-State level (i.e. within Mexico as a federal country) of the UNCAC international peer-to-peer review mechanism (MEXAB5 project), described as a good practice (see dedicated section).

Nonetheless the counterparts do not all see UNODC as a convener between the Federal and State levels, and they identified some missed opportunities to create networks within each State. Over the years, the portfolio has dovetailed the opportunities offered by the evolving legal framework to expand the variety of its counterparts – but it is only just starting to be perceived as a meaningful go-between among these partners.

**FINDING 2: UNODC MEXICO HAS PRAGMATICALLY CRAFTED ITS PLACE IN THE ANTICORRUPTION LANDSCAPE OF THE COUNTRY, BY FILLING SPECIFIC GAPS AND ADAPTING TO POLITICAL SHIFTS TO SUPPORT THE IMPLEMENTATION OF THE NATIONAL POLICY FRAMEWORK.**

When the portfolio started, with the MEXZ95, the key priority of UNODC Mexico was to start cooperation on anti-corruption and create a space for this cooperation. UNODC in Mexico therefore entered the scene of anti-corruption with a project-based Memorandum of Understanding, not with a fully developed strategic vision agreed with the Government on its role in this regard – but by filling the gaps identified in the implementation of national policies if these also contributed to the implementation of the UNCAC. The selection of the portfolio’s partners corroborates the alignment with the country’s normative framework: a
large proportion directly works on the country’s policies, laws, and regulations on anti-corruption, so there is a mutual reinforcement between the elaboration of the portfolio and that of the normative framework. The national Government’s Inter-ministerial Committee on international cooperation projects, which convenes annually, is the platform where UNODC projects are discussed and receive clearance (whether they are at the Federal, State, or municipal level). UNODC then coordinates projects with other anti-corruption actors, including those funded by the same donors (such as USAID’s previous support to Jalisco Comptrollership). The MEXW26 project, as the “umbrella project”, had offered a lot of flexibility to initiate partnerships and implement activities with a wide variety of partners. It enabled UNODC to occupy any niche that responded to Government strategy (and Government perception of an acceptable role for UNODC) and the former’s mandate. All ensuing projects, although more specific in scope, replicated this pragmatic approach, subject to donor support.

To occupy these relatively narrow, but multiple niches of cooperation, UNODC multiplied cooperation partners in a pragmatic way, using donor-driven opportunities. Incrementally, the portfolio asserted a stronger role than in 2017, when the MEXW26 project started. UNODC in Mexico achieved this portfolio growth through responsiveness and specialization: it has been able to meet specific requests made by the Mexican government, civil society, and the private sector, with targeted sets of activities, usually in a tailored fashion.

As a result, the needs and demands identified by UNODC, and the number of their related partners, grew exponentially, particularly at the State and even municipal level. In parallel, while the bond with Federal level institutions, such as INAI, Auditoría Superior de la Federación and others continued, around 2020 collaboration with federal officials became increasingly difficult and the number of federal-level strategic partners decreased, because of the political climate, and to some extent because of the COVID-19 pandemic.

Meanwhile, partnerships were retained with State-level partners, also contributing as donors. The portfolio now interacts with close to 200 institutions (whether public or private) from the municipal to the state level but faced increased difficulties to partner with federal government counterparts whereas human resources were planned and financed for maintaining a smaller amount of partnerships at the federal level. Mexico counts 32 States and 2,444 municipalities, as opposed to 15 to 20 national anti-corruption stakeholders.

This strategy has overstretched the Office’s installed capacity: the transactional costs and the human resources needed to maintain such a wide portfolio with multiple partners, are too high for a portfolio that

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5 34.51% of the survey respondents have been involved in the design of the normative framework, which is an exceptionally high score for such question. Interviews confirmed that many portfolio counterparts contribute to the preparation of policies, laws, or regulations at Federal or State level.
has no core-funding and no permanent employees (as opposed to project staff). This has resulted in diminished efficiency, which the counterparts perceive: only 5.08% of survey respondents consider that UNODC distinguishes itself by the efficiency of its administration and logistics. The MEXAB5 project is the best illustration of this challenge: in an effort to retain relevance in front of the challenges of the COVID-19 pandemic, and a change of political and institutional context, when key federal government partners decreased their involvement in the project, UNODC Mexico redirected this project to a variety of federal institutions under the national anti-corruption mechanism, and to the State level. Whilst the national peer-to-peer review mechanism was designed from the outset to be implemented at the state level, components 1 and 2 were redirected to the state level and to the private sector with the input of SESNA. However, this shift multiplied partners and put a heavy management burden on the Office, which would have required a level of agility in management and administration which was not present, leading to serious difficulties in the implementation of the project.

**FINDING 3. OVERALL RELEVANCE OF UNODC PROJECTS AND MOST ACTIVITIES ON ANTI-CORRUPTION IN MEXICO IS VERY HIGH, BUT SOME ACTIVITIES COULD HAVE BEEN BETTER TAILORED TO INTENDED USERS**

Overall, the counterparts consider the activities to be well tailored: survey respondents rate the needs-responsiveness of UNODC activities at 78%. The MEXAB5 case study and the other projects display high relevance to the issues faced by their beneficiaries. Their overall design, which was highly adaptive, enabled the projects to stay relevant in a fluid context.

Although the topics were always well-tailored, the detail of some activities was sometimes dissonant with the needs and the state of development of the beneficiaries’ anti-corruption capacity. For instance, in the MEXAB5 project, several interviewees considered the trainings on conflict of interest not specialised enough on a specific topic, not tailored to the individual institution, not always well documented by research, not always tailored to the level of development of respective institutions.

Pertinence glitches during implementation could be attributed to the overstretched human resources, which are not compensated by the contracting of experts to consult with all project participants and tailor with high granularity. This significantly hinders the staff technical capacities, and it does not solve the issue of understaffing and overburdening of management issues. The analysis of the financial reports of the MEXAB5 project for instance, revealed that the consulting services budget was very low compared to that of general services (travel and lodging), which was clearly inappropriate for the activities envisaged at State level, and that it was also under-utilised, especially until the last three months of the project. In these circumstances, the staff cannot be expected to consult in detail with the multitude of partners and project participants – thus they would have to strategically plan and prioritize. Data triangulation and disaggregation confirms this interpretation: our interviewees, who were usually among the most involved and/or at high decision-making level, usually felt they had been consulted (with a few exceptions), whereas survey respondents, who are less embroiled in the projects, assess at only 54/100 their level of inclusion in project/activity design. This analysis shows that there is room to further optimize the fine-tuning of some activities and outputs, contingent to better distribution of budgetary resources – although the overall relevance of the projects is very high, as is that of most activities.

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*Survey respondents include 32.99% of one-time participants, and 20.30% respondents who do not recall how often they have interacted with UNODC – which indicates low level of involvement.*
FINDING 4. UNODC MEXICO HAS ACCESS TO SMALL NICHES WITHIN THE NATIONAL STRATEGY, FOCUSING ON PREVENTION, BUT THIS SUPPORT IS NOT CONMEMSURATE TO THE NEEDS AND POTENTIAL DEMAND FOR SUPPORT ON ANTI-CORRUPTION

The limited international support to anti-corruption efforts in Mexico is not commensurate to the demand. For some stakeholders, UNODC is the only international partner facilitating activities on anti-corruption⁷. UNODC’s portfolio in Mexico therefore faces high demand, especially at State level, as illustrated by the multiplication of niches of cooperation and partners. This is confirmed by our interviewees at that level, who systematically hoped for continued cooperation and shared innumerable ideas for joint initiatives, micro- or larger projects, and follow-on activities. Simple review of the semi-structured interview notes shows that the section on “future needs and opportunities for cooperation with UNODC outweighs other sections in most cases. Most in-demand is citizen sensitization in general, including through the expansion of the GLOZ99 project to reach out to more universities (especially public ones) and private firms (other sectors than energy and pharmaceutical). Another top item is the support to the broad spectrum of State-level anti-corruption systems and normative framework (alignment with national and international legal norms, and harmonisation within State-level normative frameworks). Continued stakeholder training and convening is also frequently requested for specialized, technical topics such as AML in the context of corruption, asset recovery, or both public and private integrity schemes. So far, the portfolio has raced to meet these requests, and has created a snowball effect in the demand. But there are intrinsic limitations to this “race” in terms of both thematic scope and resource mobilisation.

The efforts made by UNODC (and other international organizations) to support Mexico’s anti-corruption stakeholders are certainly welcomed by both Federal and sub-national stakeholders (government and non-government), provided they focus on the prevention side of anti-corruption. Investigation, prosecution, and sanction are mostly viewed as national prerogatives which are not conducive to international support. Asset recovery stands alone as a highly specialized, technical area where there is a match between demand from specialized institutions and UNODC’s expertise-based offer in the MEXAD4 project.

UNODC’s focus on the prevention side of anti-corruption has prevailed throughout the lifetime of the portfolio, but it became ever more pronounced since 2018, as reported by numerous interviewees. The endeavour made by UNODC to provide technical assistance on anti-corruption aside of the Justice sector or law enforcement programs was a far-sighted decision, and in the foreseeable future it opens an opportunity to make further relevant contributions to Mexico, if they are funded. But conversely, this focus creates limitations to UNODC’s margin of manoeuvre in accessing and channelling available international donor funding to anti-corruption, because prevention of corruption, which does not yield immediate measurable outcomes, is comparatively less attractive for donors targeting justice indicators than interventions on the investigation, prosecution, and sanction side.

Also taking into account the inherent difficulties in raising funds from international donors for projects in a non-ODA recipient country, in the medium to long run, funding by interested States (a fee-for-service) is probably the most likely source for follow-on projects which work with public institutions. Another potential source of funding in the shorter run would be the private sector. The GLOZ99 project, which addresses upstream prevention with students destined to work in the private sector, in close cooperation between higher education institutions and sizeable private firms, is perceived as very successful and relevant by all actors. It is funded by Siemens and elicits sustained interest among actual and potential donors. As a whole, and considering the scale of Mexico as a large, federal country, the portfolio relies on too small resources to come close to a critical mass of support that may significantly weigh in the country’s corruption patterns.

⁷ 55,13% of our survey respondents have never participated in any activity organized by any other international partner – either before or after the projects. 28,85% participated in one or a few over the years, and only 10,26% had participated in many. At State level, the figures indicate even less outreach by international partners.
FINDING 5. THE SET OF PROJECTS EVALUATED HAS FUNCTIONED RATHER AS AN AGGREGATION OF ACTIVITIES THAN AS A STRUCTURED PORTFOLIO, WHICH DOES NOT INCENTIVIZE STRATEGIC MANAGEMENT AND STRATEGIC PLANNING.

As is often the case in UNODC, its anti-corruption portfolio in Mexico has faced the challenge of having extremely limited core resources. This has not enabled the UNODC office in Mexico to develop a systemic and strategic approach for the portfolio, with an explicit theory of change and associated results indicators which might make the offer of support more structured and predictable. Instead, UNODC Mexico relied on the UNCAC framework and structured its first generation of pilot projects based on the recommendations of its Review mechanism, which ensured some degree of alignment with both Mexico’s efforts and with UNODC’s obligations as guardians of the UNCAC but did not constitute a fully legible strategic vision for donors and partners. Without permanent staff nor budget for research and project development, nor strong headquarter knowledge products, nor programmatic guidance, UNODC Mexico therefore developed and expanded an aggregation of individual activities, clustered either by the donor’s project document or by partner, focusing largely on outputs with limited means of measuring their impact on corruption. Some projects (MEXW26, MEXAB5 and GLOZ99) have been managed experimentally through pilots, and only one (GLOZ99) is supervised by headquarters in Vienna. Others amount to demand-driven technical assistance. They are largely perceived by several key stakeholders as a fee-for-service, afforded by the beneficiary public institution. As one interviewee put it, “The business model is based on specific demands, not on planning or big picture approaches. One cannot plan or predict where the needs will come from.”

Part of the shortcomings can be explained by project management and strategic planning challenges (initiation, design, procurement, monitoring) that do not rise to the portfolio’s ambition. UNODC in Mexico portfolio staff has generally a good reputation, is perceived as adaptable and user oriented. For example, during the COVID-19 pandemic context, they devotedly adapted training materials and activities to local contexts and constraints, and they provided non reimbursable technical assistance services for local stakeholders in the States of Nuevo Leon and Coahuila. Project staff also demonstrates competence and belief in the UNCAC, has knowledge of Mexico, and demonstrates their abilities to deal diplomatically daily with international and local counterparts.

The UNODC in Mexico’s internal advisory, monitoring and research group (a.k.a. GAMI), as explained further down, is an asset which has the potential for strengthening the portfolio, as well as logical frameworks and focus on evidence-based approaches to justify project initiation. However, due to the recent creation of the group and to the on-demand approach (rather than systematic) of its review platform, it has been under-used by the portfolio.

At the same time, the high number of daily administrative processes and tasks sometimes go beyond the human resource capacity of the office. Centralised management practices, various bottlenecks at several levels in financial, procurement and administrative processes, and lack of planning have sometimes led the portfolio to operate in a constant state of emergency, while not fully executing the budget by the closing date of data collection for this evaluation (December 2022).

As a result of these patterns, the attention on the impact, on service delivery, and end goals has been curtailed. UNODC in Mexico added a “portfolio coordinator” function to the MEXAB5 project leader (in addition to the tasks already attached to the function), and now hosts UNODC’s Regional Hub on anticorruption. Yet, the time available for staff to discuss intellectual agreements and disagreements on evidence, synergies, and operational alliances across both UNODC and UN agencies’ internal units is limited. Occasionally there is some mutual support from one project to another (e.g., co-organising a venue, exchanging information), but the projects overall function on separate, parallel tracks.

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a This Hub, located in Mexico, covers Central America and South America. Its purpose is to coordinate anticorruption work, along with sub-regional hubs in Colombia and Panama. Yet, the evaluation team found no evidence of substantive interaction between the hub and the portfolio, either at project or strategic level.
The global UNODC business model and the emerging political and administrative risks pushed the project staff to plan around activities and incidental opportunities instead of strategically managing projects and focusing on objectives, outcomes, and impacts.

**FINDING 6: THE MONITORING, REPORTING AND LEARNING, WITHIN IN THE PORTFOLIO AND AT ORGANISATIONAL LEVEL, HAVE BEEN UNEVEN. THEY DO NOT CONTRIBUTE SUFFICIENTLY TO STAKEHOLDERS’ IDENTIFICATION OF UNODC’S OFFER AND COMPARATIVE ADVANTAGE.**

In the absence of an overall strategy or ToC, UNODC in Mexico tried to draft a basic logical framework, but this was not a coherent results framework based on strategic project management best practice. The design of the projects which gradually formed a portfolio was also difficult to inform, because UNODC still faces the challenge of making good use and provide timely analysis of the best research evidence about what works in anti-corruption policy making, as the UNODC Strategy 2021-2025 recognizes. Preliminary studies were used more to justify than to plan a project: although an attempt was made to established links between demand-driven projects and the overall UNODC priorities, it lacked a clear idea of specific outcomes to achieve objectives. The logical frameworks of the projects mostly contain activity- or output-level indicators (which yield little learning about results), or high-level impact indicators which were not informed in the projects’ reports, that do not vertically connect as to contribute to UNODC outcome indicators.9

In the same way, a systematic review of reliable and available evidence of what works to curb corruption and a catalogue of best international practice were absent in the drafting of most of the projects. For instance, concerning some activities (e.g., codes of ethics) for which evidence draws largely from developed countries, questions could be raised as to their transferability to less developed countries. Worldwide research on corruption is growing, however recently published comparative evaluations are mostly centred on legislative reform, and good practices in this domain are scarce.10

**Box 1: Example of evaluative literature review that could have supported project preparation**

<table>
<thead>
<tr>
<th>Policy</th>
<th>Country</th>
<th>Source</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sanctions - Anti-bribery Compliance</strong> – for instance MEXW26 Project</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Highways checkpoints</td>
<td>Indonesia</td>
<td>Olken &amp; Barron (2007)</td>
<td>4</td>
</tr>
<tr>
<td>School tests</td>
<td>Burkina Faso</td>
<td>Boly &amp; Armantier (2008)</td>
<td>4</td>
</tr>
</tbody>
</table>

| Access to information – for instance MEXAB5 Project |
|-------------------------|---------|---------------------------------------------|-------|
| Food subsidies          | India   | Peisakhin & Pinto (2010)                   | 5     |
| Institutional trust     | Argentina | Alessandro et al (2019)                | 5     |
| Electoral behaviour     | Mexico  | Chong et al (2011)                        | 5     |
| Education               | Uganda  | Reinikka & Svensson (2003)                | 5     |
| Health                  | Uganda  | Björkman & Svensson (2009)                | 5     |

The consistency of the design of experiments in the field can be evaluated with the Maryland Scale (Sherman et al, 2002) to corroborate the validity of the conclusions, analysing whether there is a causal relationship between the implementation of the treatment and the verified effect, which makes it possible to rule out alternative interpretations. This scale ranks the level of consistency of the evaluation design in levels, with 5 being the most rigorous level, and 1 the least rigorous.

*Source: Desk research by evaluation team.*

9 Furthermore, 2030 Agenda for sustainable development has Goal 16 – Peace, justice, and strong institutions cascade down to indicators 16.5.1 and 16.5.2 according to the Statistical Commission booklet for this Agenda.). As the two indicators would not be enough to measure success, there is a need to identify both first order and second-order indicators as to measure effects on different types of corruption. Yet, projects did not include these indicators, nor indicators tracing the contribution of funded activities to achieving that goal.

A prospective political economy mapping of the various types of corruption in each setting and thus of the principal factors responsible for their existence, was never done either.

Box 2: Example of possible stocktaking of evidence-based approaches

<table>
<thead>
<tr>
<th>Experimental evidence:</th>
<th>Random field experiments increase the quality of causal identification, generate data that is close to reality, and facilitate the observation of other factors that may influence corrupt behaviour, such as context, culture, ethics, and morality.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-experimental evidence:</td>
<td>There is a shortage of studies on the effect of the dismissal or removal of public officials following complaints filed by citizens, and on the deterrent effect of the criminal system on corruption offences.</td>
</tr>
</tbody>
</table>

Source: Evaluation Team.

To take into consideration a fluid political context, UNODC Mexico has negotiated and entertained continued dialogue with its counterparts. As shown in Finding 2, as these efforts yielded uneven results, the portfolio has been refocused towards State level counterparts. An analytic exercise was done by UNODC Mexico office that charts government counterparts and donor interests to identify potential opportunities for new anti-corruption projects. This mapping exercise could be further developed to include other relevant information to help make strategic decisions.

Knowledge management was recognized as an area of opportunity for UNODC Mexico Office. The knowledge management systems are still under development at the office. With no focal point within the portfolio to ensure evidence and learning are used in decision-making, responsibilities for knowledge management are diluted and poorly assumed. The projects, caught in everyday emergencies, do not invest in producing knowledge or channelling it into decisions and planning. Attempts are being made to improve this, but there is still some distance to go.

Given how little is established in research or practice about how to curb corruption, and how few resources the portfolio had for upfront analysis, UNODC Mexico was not able to inform the projects’ results and outcomes with vast evidence of what works and does not work. Illustrative of the gaps in knowledge about corruption, some interviewees commented that the corruption perception indexes were enough to draft anti-corruption policies, and that the international community has not reached a consensus on what is intended to be measured, governance or corruption. This leads to the problem of the ‘missing middle’, that is how project results contribute to achieve the desired end goals. With so many activities to implement in international and locally funded “umbrella project”, it is imperative to separate immediate results from the changed behaviours or solutions to systematic flaws. An inability to produce quick reductions in corruption is not necessarily a weakness, but if projects cannot do this, it would make sense to use proxy indicators. Thus, the anti-corruption portfolio was ill-equipped to identify meaningful and attainable intermediary project results to measure success or failure.

This shortfall, in turn, weakened the relevance of the projects’ monitoring and reporting system. The analysis of project progress reports shows that these documents are largely activity focused. They do not help to figure out likely institutional changes (outcomes) from the perspective of stakeholders – because transformative change is not clearly defined in the project documents and the staff neither have the backdrop nor time to trace it. The recent creation of UNODC in Mexico’s ‘GAMI’ will be an asset to advance ToCs, and results matrices in the future. GAMI advice mainly comes in the initiation phase of each project (vertical logic), reviewing the outputs and outcome indicators, and the information sources (evidence) used to support the project proposal. The country office does need more help in strengthening their monitoring and evaluation, especially to develop processes for a successful knowledge management framework.

The common feature amongst projects is that they seek to respond to the limits of the country’s institutional capacity, based on cursory analysis (channelled in the documentary basis) of how the country’s anti-
corruption architecture practically interacts, prevents, or possibly reinforces corruption situations. The review of the legal and regulatory framework, organizational structure, resource endowments, and working patterns, was occasionally done in some cases and both donors and partners appreciated it (e.g., for some specific components of the MEXW41, MEXZ95, MEXW72, MEXAD4 and MEXABS projects). Nevertheless, in the absence of inception phases (mostly due to donor requirements) this analysis typically took place during project implementation – often finalised towards the end, due to delays in the disbursements and implementation of activities, as evidenced by financial reporting available. Therefore, where excellent analysis is produced, it often informs activity design, if sometimes at the last moment: for instance, in the MEXAB5, the ethics and conflict of interest course was based on a survey showing that State public officials were not clear on what a conflict of interest is, were extremely interested in the issue, but had time constraints. Yet, such analysis cannot inform project design because it comes too late and there is no time and not enough staff retention to transfer the learnings from one project to the next. Unfortunately, these shortcomings, understandable when the first batch of projects (MEXW26, MEXW95) started, were not fully addressed in the design of the majority of follow-up projects. The exception is the MEXAD4, which executed an in-depth analysis as first project deliverable to inform all activities.

The cross-fertilisation and sharing of information, for learning purposes, is not a common practice among projects in the anti-corruption portfolio. Most of the information is project-specific and each project works mostly independent of the others. The main reason UNODC Mexico staff members have knowledge of other projects, apart from the one they are currently involved in, is experience working in them. Since the GLOZ99 project is conducted simultaneously in two other countries besides Mexico (Kenya and Pakistan) there are activities in this project aimed at sharing information with other country teams which would contribute to learning. Some of these GLOZ99 information sharing and learning activities could be emulated by the anti-corruption unit in Mexico for other projects. Equally important was the dissemination of learnings from MEXAB5 peer-to-peer activities. There is a good example of the use of knowledge that was created by one project and used by another. One of the sub-projects of one “umbrella project” (MEXW26) which had as outputs a methodological toolkit and a document with recommendations for the implementation of a peer-to-peer review mechanism for anti-corruption reforms at the sub-national level, so these products have been used to implement the mechanism in the 32 States for the MEXAB5 project. This is a straight-forward example where the knowledge products created in one project contribute to the implementation of a subsequent one. However, the use of knowledge created by the projects could be enhanced, for this strategic planning is needed to be able to have clear goals for the set of projects and thus develop more adequate tools to collect and analyse data generated from the implementation of each project.
EFFECTIVENESS

EVALUATION QUESTIONS:
1. To what extent has the portfolio contributed to the strengthening of Mexico’s anti-corruption policies and institutional setup?
2. To what extent has the portfolio contributed to reinforcing the capacity of Mexico’s institutional, civil society and private actors to prevent and prosecute corruption, and to recover assets?

FINDING 7: BY TRANSFERRING KNOWLEDGE AND KNOW-HOW, BENCHMARKING, AND GOOD PRACTICES TO ITS ANTI-CORRUPTION PARTNERS, UNODC MEXICO HAS CREATED NECESSARY CONDITIONS FOR HARMONISATION OF THE DOMESTIC REGULATORY FRAMEWORK WITH UNCAC, ESPECIALLY AT THE STATE LEVEL.

Knowledge transfer is a key intended result of the portfolio, which the counterparts understand clearly: 43,65% quote transfer of knowledge as one of the main contributions brought by the portfolio – the second most often quoted contribution. The projects have deployed three types of knowledge transfer products:

- Training,
- Cascade training, and
- Knowledge products.

However, at the time of the evaluation, the projects have not generated substantive evidence of systemic change about the effects of knowledge transfer. The progress reports focus on activities and, in some cases, on satisfaction questionnaires related to specific events (typically training events). To bridge this gap, the evaluation team systematically asked interviewees and survey respondents about knowledge gains, in general and on specific topics. The results are shown in Table 1.

Table 1: Overview of training activities and knowledge products

<table>
<thead>
<tr>
<th>Project</th>
<th>Trained/educated stakeholders</th>
<th>Key knowledge products</th>
<th>Key topic(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MEXW26</td>
<td>Zacatecas schoolteachers and pupils, SMEs, States’ Social Protection Comptrollerships</td>
<td>Measurement and M&amp;E frameworks on corruption, Diagnosis for Customs Agency, Mapping</td>
<td>General anticorruption Ethics and integrity</td>
</tr>
<tr>
<td>MEXW95</td>
<td>Mexico City civil servants</td>
<td>Best practices compendium</td>
<td>General anticorruption Ethics and integrity</td>
</tr>
<tr>
<td>MEXW41</td>
<td>Evaluation Units within States’ Public Procurement, Public project awarding authorities</td>
<td>RBB capacity diagnosis, Needs assessment Programme analysis</td>
<td>Results-based budgeting Performance evaluation</td>
</tr>
<tr>
<td>MEXW72</td>
<td>States’ Public Prosecutors’ Offices (specialised officials), Banking Commission</td>
<td>Money laundering perception survey, SWOT</td>
<td>Anti-money laundering</td>
</tr>
<tr>
<td>MEXAD4</td>
<td>States’ Public Prosecutors’ Offices (specialised officials), Specialised asset recovery officials</td>
<td>SDG financing analysis and investigation</td>
<td>Asset recovery</td>
</tr>
<tr>
<td>MEXAB5</td>
<td>University Professors, University Students, CSOs, Private companies</td>
<td>State Administration operational environment reports</td>
<td>UNCAC: overview and articles 9, 10 and 33, Oversight</td>
</tr>
</tbody>
</table>
Feedback provided by survey respondents and interviewees shows that several flagship activities effectively transferred knowledge to a great number of individuals in key institutions who form part of the broader anti-corruption architecture at Federal and State level, and among civil society anti-corruption actors. Interviewees most often quote trainings and workshops, and peer-to-peer review mechanism among States. The latter was a radically new inroad into the implementation of the UNCAC in a federal country: in a daring move, it reproduced the inter-governmental peer-to-peer mechanism of the Convention to the inter-State level (see Good Practices). Although interviewees concur that it was extremely demanding, and sometimes erratic in terms of logistics, they highly appreciated this opportunity to learn from peers, and to learn where their own institutions stand through benchmarking.

All activities in educational institutions, from primary/secondary schools in Zacatecas (MEXW26 project) to guest lectures, hackathons, and internships with higher education (GLOZ99 project) were heartily approved by the interviewees as breeding knowledge and evidence in a deeper way, by reaching the youngest and, through them, their families and future professional environment. Some niche trainings, such as the ones with sports federations (MEXW26 project) or trainings on asset recovery (MEXAD4 project) or AML (MEXW72 project) constituted first-times for their participants, who measured their needs and potential, and acquired specialised knowledge. Citizen participation trainings and event involving CSOs as part of the dedicated Citizen Participation Committee are another good example. Much of the knowledge transfer was foundational (several interviewees referred to it as “general” or “basic”). A relative majority of survey respondents note a transition from “absent” or “low familiarity” with key anti-corruption concepts and practices, to “good” or “high familiarity”. 33.83% of respondents self-evaluated as not or little familiar with transparency at the start of the portfolio, but only 2.49 now. No or little familiarity with accountability switched from one third of respondents to hardly 3%. These two topics register the highest percentages of respondents who now considered themselves “very familiar” (about three quarters each).

Peer-to-peer review mechanism was “unfamiliar” to 71.15% respondents at the start of the portfolio, but it remains so for hardly more than a quarter now. Only 13.93% of respondents remain “unfamiliar” with public integrity mechanisms, as compared to 54.23% in 2016. Internal controls, which were “unfamiliar” to 45.77% respondents in 2016, remain so only for 8.46%. Perhaps most spectacular considering the technicity of the topic, the 81% respondents who considered themselves “unfamiliar” with asset recovery, reduced to 45.27% now—mostly with transfer from “not familiar at all” to “rather familiar”. The survey results are not significantly different between public officials and civil society actors or academia.

While the portfolio was certainly not the only factor for this progression, and although it may have not yet reached a critical mass of civil servants and civil society anti-corruption actors, it has contributed to the gradual spread of founding corruption prevention knowledge and know-how. This, in turn, contributes to the emergence of necessary conditions for the implementation of the existing and emerging anti-corruption local
legislation and regulations. The normative framework increasingly reflects the UNCAC, with the gradual alignment of national regulatory provisions to the Law on the National Anticorruption System, and with the harmonisation of States’ corresponding legislative and regulatory provisions. As the normative framework so evolves, an increased proportion of actors will be ready to uphold and implement it, because they will be equipped with the necessary knowledge to do so. This was illustrated in Quintana Roo State, for instance, where the MEXAB5 project swiftly adjusted its deliverables to the new State legislation, to support the State anticorruption actors to prepare the deployment of the amended law.

This opinion was broadly shared among the interviewees at State level, in relation with all projects of the portfolio. Interviews show that most projects also transferred knowledge about the international standards and their reflection in the local normative frameworks at Federal (Secretariat of the National Anti-corruption System) and State levels. The recognition was highest among States’ anti-corruption systems, public audit institutions, agencies in charge of access to information of public importance, and government comptrollerships. In several cases, the portfolio also contributed knowledge of international standards directly into draft regulatory framework: an example among others is the UNCAC-based analysis of ethics safeguards and contributions to several Professional Associations’ codes of ethics. Another one is the contribution of the UK Embassy to the international transparency and integrity indicators study currently quoted and used by the Secretariat of the National Anti-corruption System.

However, for these necessary conditions to translate into tangible results, several assumptions need to be fulfilled, which most projects of the portfolio insufficiently factored in. The first one is the offer of a package of knowledge products and trainings that would not only inform, but also prepare the partners with hands-on knowledge, for instance, to allow citizens participate in social auditing mechanisms. Several actors at the Federal level, who are undergoing deep restructuring and/or business process transformation, regretted that good general thematic deliverables, were not complemented by sufficiently deep, operational, and specialised knowledge to serve the frontline civil servants. For instance, much of the training focused on the general anti-corruption international and domestic legal framework. While this may have been most useful at the start of the portfolio, it is no longer viewed as a priority by the counterparts – except in the case of very recent legislation, like in Quintana Roo State. The interviewees would sometimes prefer “deep dive” training on State-level legislation, and chiefly wish they could receive more training on how to implement the by-laws and other regulatory provisions that roll legislation out. This opinion was most widespread among Federal-level counterparts, whereas the State-level counterparts were more satisfied. Yet, then asked what gaps had not been addressed, and need to be filled in the future through possible cooperation with UNODC, even State-level counterparts often quoted “specialised”, “hands-on” or “operational” training and knowledge products. They felt that the projects had opened a door, but it did not always address the emerging questions raised by participants on pin-pointed topics and techniques.

The survey results are coherent with the opinion of these interviewees: 81.59% of the respondents have read the General Law of Mexico on Administrative Responsibilities (which contains the key provisions on preventing and reporting corruption), and 73% have read the General Law on the Anti-Corruption System of Mexico (which forms the basis of the anti-corruption architecture).

Available evidence on training activities highlights that their effectiveness depends upon the length of treatment of a topic, the level of preparation of training moderators, and the availability of other reinforcing actors – the latter certainly deserving more thorough attention. In relation with MEXAB5 project, two activities show limitations to the effectiveness of training: interviewees commented, and direct observation confirmed that a 15-hour workshop on public integrity or the two times 36-hour peer-to-peer review mechanism workshop in three days cannot produce the results of more intensive, multi-faceted interventions. The activities could have been more successful, had they included more accessible contents (teaching principles across all knowledge transfer interventions, plain language), the longer training timed...
in several sessions, and other complementary reinforcement outputs such as follow-up publications and practical knowledge products. Public integrity workshops lacked a plan to transfer the knowledge to daily functions, or a peer-to-peer review mechanisms lacking an action plan with a timetable and estimated costs. Based on the UNCAC IRM reports, the documents produced through the national peer-to-peer review mechanism did not include a clear roadmap, which, according to several interviewees and based on lessons learned, reduces the likelihood that recommendations will be implemented.

The second assumption, often subsumed in logical frameworks under the general concept of “political will”, is that the project participants who received training and knowledge products have the margin of decision to use what they have learned in their daily professional practice: this supposes a conducive environment and sufficient functional autonomy. Interviewees have been very guarded on this topic, but survey results suggest that this assumption is not entirely fulfilled. The margin of progression on the knowledge and application of founding anti-corruption concepts and tool-kits (transparency, accountability, peer-to-peer review/support, asset recovery, internal controls, integrity mechanisms) is much lower for institutions than for individuals: about 75% respondents consider, for instance, that they now apply “a lot” transparency and accountability for themselves (a 43 and 46% increase respectively compared to seven years back), but they are only about 60% to consider that their institution/organisation/private firm apply them “a lot” (which is still a 30% increase compared to seven years ago). The more we asked respondents to generalize, the less convinced they were about the application of these principles, although they see progress: only 28,86% consider the entrenchment of transparency to be “very high” in Mexico in general, which is a 20% increase compared to respondents’ perception’s seven years ago. 25,37% consider accountability to be “very much” entrenched in Mexico today, as compared to 5,97% only seven years ago.

This data, cross-referenced with desk research about the corruption perception indexes in Mexico, and the future needs for support expressed by the interviewees (support to hands-on implementation, broadening of the circle of participants to trainings and knowledge transfer across institutions and citizens, support to oversight, reporting and control mechanisms), suggests that the officials and civil society actors in charge of corruption prevention, even if committed and capacitated, do not find themselves in a sufficiently conducive institutional and societal environment to fully deploy their knowledge and know-how. This environment is quickly evolving, and survey as well as interview data suggests this evolution is generally positive – but it is not as fast as the evolution of targeted individuals’ capacity.

Another assumption for effective knowledge transfer concerns cross-fertilisation across projects and countries. According to the documents available in the repository of UNODC in Mexico, there was not enough documentation of past project experience, nor easily accessible and searchable evidence to convey good practices and learning, or to connect stakeholders from other UNODC anti-corruption projects in Latin America, to the Mexican counterparts. The portfolio still organised events to network its Mexican counterparts to their peers in the wider region, and the staff went out of their way to this end (e.g., under the MEXAD4 project as directly observed by the evaluation team), but this potential seems to have been underused: among the benefits of the portfolio’s activities, networking with anti-corruption actors from other countries was least often quoted. This fact was confirmed by interviewees of UNODC Mexico office: knowledge exchange and technical support between headquarters and Mexico’s office was very weak, whereas peer support amongst regional country offices existed, but lacked frequency and facilitation. For instance, some informants frequently stated that ROCOL was recognized as proficient in dealing with asset recovery projects because of the World Bank-funded StAR initiative, but there are no sufficient mechanisms to exchange project experience and cross-fertilize for the benefit of project partners.
FINDING 8: UNODC ACTED AS A CATALYST FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION FRAMEWORK AT STATE LEVEL THROUGH MODELLING AND DEPLOYMENT OF TAILORED TOOLS

The portfolio has contributed to addressing the most serious challenge to anti-corruption (as identified by 85.57% of survey respondents): the existence of deficiencies in internal mechanisms of prevention, investigation, sanction, and accountability. To this end, the portfolio contributed expertise to elaborate and model such mechanisms in law and in practice, and to deploy tools that support these mechanisms. Along these lines, 33.5% of our survey respondents identified the provision of expertise as one of the key contributions of the portfolio (third most quoted contribution). Much of this expertise fed into the Mexican normative framework, and into the tools and mechanisms deployed to implement it.

Contribution to normative framework

UNODC mobilised the expertise of its own staff regarding the UNCAC to channel the principles of the Convention into some normative acts (policy, legislation, regulations), such as:

- City of Mexico anti-corruption Policies (MEXW95),
- MEXW26: anti-corruption toolkit for small and medium size enterprises developed in collaboration with UNDP
- MEXAB5: indirect contribution to the National Development Plan. More direct contribution to: Civil Service Sector Planning; National Program against corruption and impunity; National Anticorruption Policy and Implementation Plan; Local Anticorruption Policies and Implementations Plans (32 states)

Modelling of tools foreseen by the normative framework

In line with Chapter II of the Convention, the portfolio has supported the provision of public services to citizens in a transparent, compliant, rights-based, needs-responsive, accountable manner, by the wide spectrum of State-level actors: this in turn is expected to contribute to curbing some of the root causes of corruption. The work at State level is therefore not limited to specialised anticorruption institutions – it includes various service providing institutions whom it supports, to enhance the quality services and increased transparency.

In support, UNODC supported the rollout of some mechanisms to implement the normative framework, and what were the strengths and weaknesses. In particular, the MEXAB5, MEXW41, and MEXW72 projects, have supported quality, oversight, and transparency mechanisms:

- User-friendly citizen reporting and whistleblowing tools (e.g., WhatsApp anticorruption number in Nuevo Leon, money laundering hotline)
- Information on the impact of the decisions of public officials so that citizens promote the creation of institutions that help to preventing corruption (e.g., National Anti-corruption Digital Platform, Monitoring and performance evaluation system for projects including IT platform)
- Support to institutions in charge of ensuring and monitoring access to information of public importance, and data protection (e.g., inclusion of Institutes for Transparency and Public Information (ITEIs) such as ITEI Jalisco in the peer-to-peer review), and
- Results-based budgeting as a quality and transparency avenue (MEXW41 project).

UNODC produced deliverables to ground the mechanisms mentioned above, and to provide the actors of these mechanisms with reference documents. Examples of deliverables feeding tools and mechanisms into the anticorruption systems include:

- MEXW26: Customs bribe protocol. Manuals, glossaries for various agencies
- MEXAB5: Operational Environment Reports (in Spanish, Reportes de Entorno Operativo). This report includes: a diagnostic of the risks associated with Conflicts of Interest, mainly those in public procurement; identification of the areas or scenarios more susceptible to Conflicts of Interest; the
design and implementation of training sessions to prevent Conflicts of Interest in public procurement.

Development of the Monitoring and Evaluation Framework
- MEXW95: Integrity toolkits. Linking Mexico City to National Anticorruption Digital Platform.
- MEXW72: money laundering hotline; money laundering database; manuals
- Various IT solutions

Perception of these contributions

The overall satisfaction with these contributions is uneven. 41.67% of our survey respondents still regularly use the materials shared by the UNODC. The interviews carried out in Monterrey and Saltillo cities allow to uphold that UNODC has engaged seasoned experts (many of whom are project staff) to satisfactorily deliver the services to the participating institutions. Some criticisms also surfaced about the suitability of the deliverables that supported the anti-corruption mechanisms and tools: as was the case with training, interviews revealed the frequent perception that the tools offered are not sufficiently operational and/or tailored. This opinion is particularly present at Federal level, but the opinion at State level is more positive.

A very frequent criticism was that the burden of work elicited by the projects was disproportionate for the partners at sub-national level. As the projects have low administrative and logistical efficiency, they have required partners to contribute directly to some deliverables beyond consultation/co-creation (e.g., some interviewees were asked to translate, edit, format, re-draft entire documents such as guidelines and reports). When asked about the key contribution of the portfolio, only 15.74% quoted contribution to decision making for accelerated development of anti-corruption mechanisms.

FINDING 9: THROUGH MECHANISMS BASED ON THE CONVENTION, SUCH AS PEER REVIEW AND CITIZEN PARTICIPATION, UNODC HAS CONTRIBUTED TO NETWORKING EMERGING ANTICORRUPTION STAKEHOLDERS

The portfolio has increasingly supported existing cooperation mechanisms within the Mexican anti-corruption architecture, and it has complemented them with innovative cooperation mechanisms inspired by international practice. Almost 84.61% of our survey respondents find that the portfolio put them in contact with other anti-corruption actions in the country, and 33% of our survey respondents identified networking of anti-corruption actors as one of the contributions brought by the portfolio.

The evaluation team has identified three types of such mechanisms that breed cooperation, mutual support, and exposure of anticorruption stakeholders:
- Citizen participation mechanisms,
- Peer-to-peer review support among relevant public institutions at State level, and
- Networking and exposure of Mexican anti-corruption stakeholders, both nationally and internationally.

Citizen participation mechanisms

In accordance with Chapter II, Article 13 of the UNCAC (Participation of Society), the Federal and State-level policy, legislative and regulatory framework in Mexico foresees cooperation between public institutions and civil society organisations towards the prevention of corruption. The incorporation of the UNCAC in the agenda of governmental and non-governmental organizations at the sub-national level is expected to address, among others, one of the problems that fuel corruption: the low capacity for collective action on the part of citizens. Addressing this gap is also a priority of the national anti-corruption Law, National Policy, and National
Programme. The dedicated mechanisms are the Citizen Participation Committee (CPC), and Social Participation Committees. Such mechanism exists in every State and at national level. At Federal level and in each State where the portfolio was deployed, UNODC Mexico has created or boosted interfaces between several types of institutions and the civil society (MEXAB5, MEXAD4, MEXW26, and MEXZ95 projects).

**CASE STUDY (MEXAB5): SUPPORT TO THE CITIZEN PARTICIPATION COMMITTEES**

The MEXAB5 contains a component on support to the CPCs (and Social Participation Committees, where applicable), at Federal level and in all partner States (31 Mexican States in total):

- the project has included the CPCs in peer reviewing and peer support,
- it provided technical assistance in filling out the related questionnaires and reports,
- it supported the establishment of the working groups and working sessions of the CPCs on specific items of the States’ Anticorruption Policies (e.g., Jalisco State),
- it provided advice to the CPC for future planning (e.g., focus on citizen witness protection), and
- it procured modules for the general public on “Ciudadanización”.

The interviewees at State level value the facilitation and support lent by the portfolio, due to the positive perception of the technical quality of its outputs and for the ability to summon and reduce resistance towards the content or messages to be shared during workshops and discussion forums. A few weaknesses were identified, such as, in some States, poor contextualization of global modules.

These services lend additional credibility and agility to the CPCs thanks to the United Nations “brand”. Interviewees in all States visited agreed that this backing has contributed to moving the agendas of civil society oversight and participation forward. As one interviewee explained: “In the local ecosystems everybody is immersed in their activities. It helps having an external viewer who is in a proposal attitude to make things happen”. Since the CPCs are foreseen by the normative framework, they would have convened and conducted this work without the portfolio. But, according to interviewees, the contribution of UNODC was to increase their quality and effectiveness by:

- Building the agendas of all these events,
- Adding expertise into the discussions,
- Observing, thus motivating/creating emulation and accountability, and
- Accelerating and facilitating the actual organization of the events.

Because it is driven by the local normative framework and the demand, the portfolio was most effective when the States were already advanced in the implementation of anti-cooperation interinstitutional platform foreseen by the Law. For instance, an interviewee at State level described “The point is to get members of the Citizen Participation Committees on board. We reached agreements with CSOs and the Comptrollership thanks to the project. We have established various platforms for cooperation with the universities and the Comptrollerships. The intention is to integrate the State Ministry of Education.”

Another example of networking which involves non-State actors is the GLOZ99 Project. All interviewees from universities and private firms agreed that the working groups created to adapt the training modules to local conditions and organize the sessions for keynote speakers provided a unique opportunity to interact amongst partners that never meet. The project further contributed to the development of a community of change agents (Integrity Ambassadors or Embajadores de la integridad in Spanish) who may in future be recruited by private companies with competent young professionals aware of the challenges regarding compliance and integrity in the workplace, and capabilities to change behaviours in time.

**Peer-to-peer review**

Chapter VII of the UNCAC foresees the mechanism for review of the implementation of the Convention by the States party to it. Like other international instruments, this mechanism is rolled out through a peer-to-peer review mechanism. Typically, this type of mechanism assesses whether Member States are applying anti-
corruption rules. It supports their progress over time. International treaties and their peer-to-peer review mechanisms are important elements of an anti-corruption strategy, which promote continuous dialogue and empower non-governmental stakeholders interested in proposing anti-corruption policies. An international example is the peer review mechanisms that have been implemented by the Mechanism of the Inter-American Convention against Corruption (MESICIC) since 2001.

### THE PEER REVIEW MECHANISM OF THE FOLLOW-UP MECHANISM OF THE INTER-AMERICAN CONVENTION AGAINST CORRUPTION (MESICIC)

<table>
<thead>
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<th>Description</th>
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<tr>
<td>The MESICIC is an inter-governmental instrument established within the framework of the Organization of American States (OAS) to support the States that are part of it in the implementation of the provisions of the Inter-American Convention against Corruption, through a process of reciprocal or mutual evaluations among the States, and in conditions of equality, where specific recommendations are formulated in relation to the areas in which there are gaps or require further progress. The MESICIC covers preventive, criminal and international co-operation aspects of the fight against corruption. The rules for civil society participation in MESICIC have contributed to increasing the openness and transparency of the inter-American anti-corruption system.</td>
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*Source: Project documents and reports (all seven projects)*

The novelty of the portfolio, through the MEXABS project, is the reproduction of this international peer-to-peer review mechanism at the sub-national level, in the federal context of Mexico, between Mexican States. The peer-to-peer mechanism was effective because it was building on previous practice, not only at international but also at inter-State level: under the MEXW26 project, a Community of Practice had already been established. Over 100 public institutions have participated in the inter-State peer review mechanism launched by the project since 2020. The survey results reflect this broad outreach, with about 73% respondents (most of which at State level) who became rather or very familiar with peer review and peer support.

The work was divided into two stages, online and face-to-face. The face-to-face in situ visit in Saltillo city, Coahuila which the evaluation team observed, lasted 36 hours divided into three days, with 25 participants from three States of the country (Chihuahua, Puebla, and Sinaloa) who reviewed and discussed the draft report of Coahuila State. The standard model considers the participation of the executive secretaries of the State-level anti-corruption systems, the public institutions that safeguard public information disclosure, and the State audit institution, where representatives of the national anti-corruption system are witnesses12.

UNODC also implemented similar in situ visits in Quintana Roo, Jalisco, Oaxaca, Veracruz, Hidalgo, Aguascalientes, Tabasco State, Sonora State, and Mexico City in 2022. Other States such as Chiapas, Jalisco and Quintana Roo participated as reviewees and/or reviewers between 2019 and 2022. The participants usually found it extremely challenging in terms of workload, but also very motivating. Some participants in three States regretted that the questionnaires were not more finely adjusted to the State level and to the respective mandates of varied institutions.

In January 2023, the MEXABS project published 32 peer-to-peer review mechanism State reports. The perusal of these reports shows that the exchanges have been deep and substantive. However, the delivery of the events and the reports themselves, as some interviewees already feared during the field visits, lacked structure: for instance, being a replica of the UNCAC IRM, the reports are not organised thematically as to allow the preparation of a draft action plan accompanied by a risk analysis, a timetable, roles and responsibilities, and estimated costs grouped by categories of expenses. According to some interviewees and based on the lessons learned identified by the evaluation, such document would require a costed action plan

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12 The work model in Coahuila State is broader in terms of representatives because it also incorporates the anti-corruption prosecutor’s office, as well as a representative of the administrative justice court.
in order to achieve leverage. Besides, the mechanisms do not foresee any follow up mechanism on the recommendations identified as a result of the peer-to-peer assessments. However, as detailed in the Recommendations section, the assessments may be considered as a set of opportunities. To inspire follow-on peer-to-peer activities and enrich the peer-to-peer mechanism, an international practice by the Financial Action Task Force (FATF) could be taken into consideration by UNODC in future.

### FINANCIAL ACTION TASK FORCE’S ASSESSMENT MECHANISMS IN RELATION TO RESULTS

The FATF has two mechanisms for evaluating the implementation of its Recommendations: self-assessment exercises, and mutual evaluations, which constitute the process by which the level of compliance with the criteria and recommendations formulated in matters of prevention and curbing of money laundering and terrorist financing. All the countries that make up the organization are subject to this evaluation process, which concludes in a Report that gives an account of the general situation of each country evaluated. The FATF evaluation measures compliance with the recommendations based on two criteria, (i) Technical compliance, and (ii) Effectiveness. To ensure clear and comparable decisions, evaluators should also summarize their conclusions with a rating. Regarding Technical compliance, for each of the Recommendations, the peers should reach a conclusion on the degree to which a country complies (or not) with the standard. There are four levels of compliance with the recommendations: compliant, mostly compliant, partially compliant, and not compliant. Regarding Effectiveness, it is measured in relation to Intermediate Results and Immediate Results. The effectiveness criteria are high level of effectiveness, substantial level of effectiveness, moderate level of effectiveness, and low level of effectiveness.

*Source: FATF’s web page.*

### Networking and exposure

Beyond the peer-to-peer review mechanism, the portfolio yields other examples of networking among public institutions within Mexico and beyond:

- The MEXW26, MEXW41 and MEXABS projects’ inclusion of municipal institutions into State-level public budgeting and anti-corruption systems (joint workshops, selection of municipal initiatives supported by the States). Although anecdotal in terms of volume and number, these initiatives were meaningful for the municipal participants: they stirred motivation and a sense of legitimacy. As an interviewee put it, they made them “feel less lonely”.

- The MEXAD4 project facilitated an asset recovery knowledge exchange among various actors, through an Advisory Group. At the time of the evaluation, the results of this initiative were not known.

- The MEXAD4 project organised study visits, which exposed Mexican asset recovery specialists with their partners in Latin America and beyond.

Overall, the interviewees from both the Federal and sub-national anti-corruption systems acknowledged that the portfolio amplified the existing trend of networking among anti-corruption actors: it made some constellation possible, and it accelerated the expansion of others. Virtually all State-level interviewees who participated in peer review or other networking activities noted that the portfolio’s networking activities helped them network for exchange of knowledge and know how, although this benefit was downplayed by the most advanced States (in terms of review results and resources), and on the contrary highly valued by the States where anticorruption resources are lowest, and most challenges were identified.

### FINDING 10: THE LIMITED DATA AVAILABLE SUGGESTS THE EMERGENCE OF NEW ATTITUDES TOWARDS CORRUPTION AND ANTI-CORRUPTION AMONG CERTAIN TARGET GROUPS.

One of the main expected benefits of the portfolio was a change of attitudes and behaviours, among the target groups, towards corruption, its prevention, and reactions to it. Survey respondents concur with this judgement: the second most quoted challenge faced by anti-corruption is “the lack of political will at all levels” (82,59% respondents), and the third is the lack of public awareness about the consequences of corruption
(77.11% respondents). In other words, and as recent literature suggests, a permissive attitude towards corruption remains. For instance, the 2020 report of Latinobarómetro found that 45% of the participants in Mexico considered that corruption is tolerable if it provides solutions to the country’s problem. The portfolio’s package of activities seeks to address this challenge: trainings, peer support/networking and sensitization are likely to contribute to such change among those who had direct contact with the projects – although. However, the portfolio has hardly researched changes of attitudes and behaviours among its target groups: only two projects conducted some ex-ante perception and attitudes survey (MEXW72 project on AML, and MEXWS6 in the case of primary schools in the state of Zacatecas). Therefore, there is no primary documentary data generated about whether and how the portfolio has affected the attitudes and behaviours of its target groups. The data coming closest to that, though not available at the time of the evaluation, would be the GLOZ99 project satisfaction survey and case study-based testing of students. Monitoring data gathered from entry and exit questionnaire on attitude changes among students already points out to positive results. The evaluation’s survey data, however, suggests that some attitudes and behaviours have evolved during the lifetime of the portfolio among the immediate portfolio participants – although it is not possible to quantify the extent of this change, nor the contribution of the portfolio to this change. The first change of attitude identified by the evaluation team is increased self-confidence linked to a feeling of belonging. In this sense, the most valuable result of networking and knowledge transfer could be moral support, because the participants feel a sense of community and mutual support beyond own team, institution, or State. This feedback resonates with the survey results: 77.56% feel more confident than before about their own actions and decisions (out of which most State-level actors). During interviews, the projects’ partners identified several external factors which are conducive to this motivation: the incentives in some States to show proactiveness in anti-corruption following high profile scandals (e.g., in public procurement or close relatives of public official logged in the government payroll), the perception that networking lends visibility to their efforts (88.46% of our survey respondents agree or very much agree that the work of UNODC has had this effect – which, in interviews, is usually connected to networking).

Another key contribution of the project, this time in terms of behaviour, is the improved use of their margin of appreciation by the target groups: 87.18% of the respondents “agree” or “very much agree” that the portfolio has “prompted them to carry out specific actions to fight corruption that they did not previously carry out”. However, given the modest size of the portfolio, this change remains limited to the immediate target group, and possibly their closest circle of professional counterparts: only 28.43% of our surveyed respondents identified relevant public officials’ “increased ability to make the right decisions, to take the right actions” as a key contribution of the project (fifth most-often quoted contribution). This is much lower than the percentage of respondents (all direct project counterparts) whose decision making is affected – but it shows the potential of the portfolio.

Sensitisation of general public forms an integral part of several projects, and 42.21% of our survey respondents consider it a key contribution of the portfolio:

- The GLOZ99, through universities, expects to sensitize communities beyond,
- The MEXW26 campaigned on integrity in sports,
- The MEXW41 contributed to the State of Nuevo Leon’s communication strategy on results-based budgeting and transparency,
- The MEXW26 reached out to schools and pupils in Zacatecas,
- The MEXW72 conducted a campaign on consequences of money laundering, and
- The MEXABS supported various campaigns and citizen/community trainings conducted by partner institutions.

The results of such activities cannot be ascertained, however there is anecdotal evidence of change among targeted students. The first change of attitude documented in interviews concerns a lower tolerance threshold towards corruption. This is particularly noteworthy among students, who were not anti-corruption actors before. University professors and referents unanimously agree that the GLOZ99 students changed their attitudes from one case study assignment to the next: confronted with a mock corruption case or corruption
risk, they changed their response behaviour. Five out of eight students who took the survey stated that their real-life behaviour towards people and institutions had changed since the lectures.

**SUSTAINABILITY**

**EVALUATION QUESTIONS:**

1. To what extent are the necessary conditions fulfilled for the results of the portfolio to last and possibly contribute to long-term impact?

**FINDING 11: GIVEN THE COMPLEX AND CHANGING ENVIRONMENT, UNODC’S BUSINESS MODEL, AND THE CONSTRAINTS PRESENTED BY CURRENT FUNDING AGREEMENTS, THE SUSTAINABILITY OF UNODC’S WORK ON ANTICORRUPTION IN MEXICO IS PARTICULARLY CHALLENGING**

Mexico has made important advances to create an institutional framework to prevent, prosecute and sanction corruption. Nonetheless, this framework is still in progress, and as such, capacity building needs are massive; although being valuable, both the scope and scale of the anti-corruption portfolio are not enough to achieve systemic changes, particularly at State level. Sustainability of results therefore hinges on the sustainability of the UNODC’s portfolio itself. The business and management model of UNODC, its structures and procedures, and the role of headquarters along the project cycle, were not part of the scope of this evaluation. Nonetheless, many interviewees from different types of stakeholders pointed to challenges in the current business and management model that would have to be retrofitted to be sustainable. The portfolio is no exception to the funding patterns of UNODC: the organisation relies essentially on extra-budgetary, heavily earmarked (project-based) resources to operate non-statutory activities. As described earlier, these patterns are exacerbated in Mexico as a non-ODA country and resulted in very limited predictability of funding sources.

The absence of a UNODC-wide model of types of corruption and responses, and the lack of a country-specific strategy around them, complicate the matter: the projects’ efforts focus largely on outputs, with no means of measuring their impact on corruption. As a survey respondent elaborated in an open comment, “I consider it has been an exercise that did not quite define what it intended to achieve.” From the donors’ and stakeholders’ perspective, lack of information about the effects and lasting results of the interventions makes it challenging to assess whether the pilot experiences are worth scaling-up or require future adjustments. This further complicates resource mobilisation, as it makes it hard for UNODC to present donors and strategic partners (at the Federal level) with a clear investment case.

The resulting variations and unpredictability of extra-budgetary funding, in turn, weighs on the reliability of the portfolio as an employer. Interviewees highlighted challenges of both frequent turnover and limited number of UNODC staff. Both Federal and sub-national level public officials also stated that UNODC staff does not have the technical expertise and operational background to come up with a detailed and realistic implementation or action plan. These and other interviewees added that UNODC recommendations, based on the IRM, were too broad to adapt to the State level. Managing cumbersome internal administrative procedures, compounded by the unusual funding of MEXAB5 project (payment advance by UNODC and refunding by the donor upon activity implementation), has proved challenging at various levels. This accumulation of external challenges and internal weaknesses leads to weak planning and monitoring of activities results, setbacks in the contracting of consulting services and general services, systemically outdated information about project disbursements, and low awareness of key deadlines. Ultimately, project implementation has been seriously delayed, with the rollout of activities stacked at the end of the projects’

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13 As regards the ABS activities with universities, the results were not known at the time of the evaluation, since the project had already developed the modules, but not deployed them.
timetable — an aspect to which also contributed the outbreak of the Covid-19 Pandemic in 2020. Donors complained that this entails recurrent requests for extensions of the execution period. These problems are affecting the reputation of the portfolio, and of the UNODC in Mexico, both with donors and some Federal partners.

Consequently, the sustainability of the partnerships between UNODC and key anticorruption partners is a recurrent concern throughout the anti-corruption portfolio. It is also important to acknowledge that the political contexts have had a negative impact on sustainability of these efforts. Finally, interviewees reported that overlaps with UNDP-implemented activities may confuse the identification of UNODC efforts by partners.

UNODC Mexico office has made efforts to be more proactive in monitoring any shift in the political environment, and to exploring potential joint project opportunities on new areas and with previously underestimated stakeholder, for example, the line of activities to prevent corruption in sports, and prevent conflict of interest in the private sector.

Despite these efforts, there is low buy-in at the Federal level of the mere idea of cooperation on anti-corruption with UNODC given its funding model. The sustainability of the portfolio is therefore low, especially at federal level. However, the evaluation found sustained appetite for continued cooperation with UNODC at State level, and two projects (MEXW41 and MEX295) offer precedents of States directly funding UNODC’s support: with a clear offer of support, there is a chance that some States may follow this example.

FINDING 12. THE LEVEL OF OWNERSHIP TOWARDS THE PROJECTS’ OUTCOMES IS UNEVEN

The overall opinion of the portfolio’s partners is that it has been useful: the respondents rate its usefulness to their institution at 77 points out of 100. 77,15% of our survey respondents considered it “useful” or “very useful” (56,85% “very useful”, and 20,30% “useful”). Comments in interviews and in the survey’s open-ended questions show that, where usefulness is perceived as limited, it is often linked to the modest size and duration of the actions — in short, to the perception that the portfolio has brought isolated support which is not sufficiently broad nor followed through. Given the small size of the portfolio (relative to the overall anti-corruption system in Mexico), its sustainability highly depends on the partners’ ownership and their motivation to play a multiplying role. The level of local ownership observed varies significantly among projects, and even between various activities within one project, being higher at the sub-national level compared to Federal government counterparts. Most counterparts would like to see a follow-on project and expressed the need for further support — but they have yet to consider investing their own resources to sustain the mechanisms, tools, knowledge, and practices promoted by the portfolio.

CASE STUDY (MEXAB5 AND GLOZ99 PROJECTS): THE POTENTIAL FOR OWNERSHIP IS VERY HIGH, BUT ITS REALISATION IS CONTINGENT UPON CREDIBLE PERSPECTIVE OF FOLLOW UP ACTION AND FUTURE PLANNING.

Several public and civil society organisation partners expressed their appreciation of the UNODC’s support. They would like to receive more training and specialised support for their transparency, integrity, and anti-corruption strategies. However, the training workshop on conflict of interest did not consider specific actions that participants committed to performing at the institutions involved. Even though some stakeholders were very keen to continue training a broader set of public officials and the need for adapting training materials to specific audiences (i.e., indigenous languages), there are no guaranteed resources to fund further activities after the conclusion of the MEXAB5 project implementation period.

In the case of the GLOZ99 project, partners from universities and business representatives are interested in continuing the collaboration. In both cases, the partner institutions have not pledged their own resources. However, the project benefitted from satisfactory design, attentive partnership management, and good ownership of results (specifically the integration of integrity courses in the regular curriculum of several universities), which offers reasonable prospects for further resource mobilisation.
It is unclear what motivation partner organizations would have to make this investment once project support stops – or whether some other support actor will be interested to build upon the portfolio’s results. The portfolio has not had the leverage to establish incentives, nor an advocacy coalition to prevent a backsliding. This possibility was neither spelled out in the assessed projects: although this could have been expected from the onset in this portfolio, the project design does not usually include a liable exit strategy.

Some major Federal partners of the portfolio underwent deep restructuring and change of key personnel during the implementation of projects up until December 2022, for instance, the Federal Customs Agency. According to several interviewees, some gaps in the understanding of shifting political and anti-corruption dynamics required adjustments of the anti-corruption portfolio, which resulted in missed opportunities to reach an agreement on both the existing and new lines of activities and the sustainability of the results obtained in the past at the Federal level, particularly in institutions such as the Secretaría de Función Pública (MEXAB5 project), the Fiscalía General de la República (MEXAD4, MEXW72 projects), and the Administración General de Aduanas, currently the Agencia Nacional de Aduanas (MEXW26 project).

The mechanisms and tool supported by the portfolio are sometimes taken up and multiplied. For instance, the Secretariat of the National Anti-corruption System incorporated international best practice on indicators from the MEXAW26 project into the drafting and implementation of the National Anticorruption Policy. But those which require resources are unlikely to be continued or scaled up in the future without further support: for instance, the peer-to-peer review mechanism may be too demanding for the States to carry on with it on their own initiative. Finally, in at least two cases, the deliverables were considered as too remote from operational necessities to yield practical, lasting results. The survey responses rating the level of consultation at 54 out of 100 points, echo the identified lack of granularity in the portfolio’s tailoring of such tools, which is an explanatory factor for uneven ownership towards some deliverables.

Changes in attitudes and behaviours are observed, but their sustainability is contingent upon critical size, which is clearly not the case – and could not have been expected of a relatively modest portfolio, as measured by funding. As a survey respondent commented, “The problem is gigantic. The actions of UNODC are just a little impulse to create conscience”. Another key issue is the staff turnover in the institutions and organisations who participated in projects. This was highlighted, for instance, in the specialised prosecution, within the MEXW72 project. Staff turnover is a typical risk in capacity building interventions, and according to the interviewees from among these institutions, only follow-up trainings could remedy this shortfall: this could motivate some partners in demand, particularly at State level, to seek further cooperation with UNODC.

Overall, given the context, as the portfolio was mainly built on opportunity-driven outputs (deliverables), it could not build robust ownership and sustainability in from the onset, and to design exit strategies for more lasting impact. As the overall objectives of the UNODC in Mexico were broadly defined and were not based on a fully developed ToC (including explicit intended intermediate effect and end goals to be achieved and systemic changes to trigger), most projects lack a long-lasting strategy and are unable to measure their contributions to long lasting changes.

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

EVALUATION QUESTIONS:

1. To what extent is the portfolio likely to have contributed to the implementation of human rights standards?

2. To what extent is the portfolio likely to have contributed to gender transformative results?

3. To what extent is the portfolio likely to have contributed to changes for vulnerable or under-represented groups?
FINDING 13: WITHIN THE TIME SCOPE OF THIS EVALUATION, UNODC MEXICO MADE SPORADIC EFFORTS TO INCLUDE A HUMAN RIGHTS APPROACH IN THE ANTICORRUPTION PROJECTS, AND TO MAINSTREAM ANTICORRUPTION FROM A HUMAN RIGHTS PERSPECTIVE THROUGHOUT UNODC MEXICO’S PILLARS, THOUGH WITH LIMITED EFFECTS.

There is general recognition – including in the research community, among civil servants and CSO activists specialised in anti-corruption, and among interviewed UNODC personnel – that corruption raises serious human rights concern. The human rights-related root causes and impact of corruption are generally underdocumented, and Mexico is no exception. The portfolio’s focus on prevention of corruption, not on sanction, did not push portfolio to adopt a human rights approach, as it does not address the justiciability and redress.

The evaluation team did not find a human rights gap analysis of the causes and effects of corruption: none of the projects is based on, nor has undertaken as a deliverable, any significant analysis in terms of access to rights, enjoyment of rights, or violation of rights, nor any analysis in terms of duty to respect, protect, fulfil, promote, redress. Where human rights are considered, these aspects are mixed and confused. The portfolio has a huge potential for human rights gap analysis of the causes and effects of corruption. The absence in the implementation arrangements of some relevant partners, such as the Human Rights Offices at the Federal and sub-national level, is further evidence of a blind spot in the implementing the approach. Other cross-cutting perspectives as gender equality and Leaving no one behind are also under-researched in general. The projects of the portfolio did not generate research or evidence on these issues either. According to interviewees, little attention from donors and government counterparts was given to underpinning the projects with human rights, gender equality, and vulnerability assessments in terms of duty to respect, protect, fulfil, promote, and redress human rights.

Some UNODC interviewees are committed to a rights-based approach, however they did not find themselves encouraged by their hierarchy, the organisational environment. In the projects’ objectives or activities, the evaluation team also found little evidence of mainstreaming or targeting for human rights perspective. Where citizens are included, usually as students, or through civil society organizations, they were not envisaged as rights holders, but rather as change agents and resource persons, or potential victims or offenders in corruption cases. While this is not incorrect, this perspective falls short of a rights-based approach. Efforts were made by three projects to include a human rights perspective during the implementation phase:

- The most advanced on this front was the MEXAD4 project: it is underpinned, if not by human rights and gender analysis, at least by human rights consideration as a part of the Sustainable Development Goals.
- The MEXABS and MEXW26 projects facilitated access to information of public importance (through support to data protection and access to data institutions, as well as the transparency webpage of the State of Nuevo Leon’s Comptroller), and participation of citizens in decision making (through the CPCs). Though these activities were not explicitly presented in terms of right to data and right to participation, they did contribute to the realisation of these rights. They also revealed the eagerness of citizens and human rights institutions to contribute to anticorruption as a right of citizens.

FINDING 14: THE EVALUATION TEAM FOUND SOME ANECDOTAL EVIDENCE OF GENDER MAINSTREAMING AND LEAVE NO ONE BEHIND APPROACH AT ACTIVITY LEVEL. HOWEVER, THERE IS NO EVIDENCE THAT PROJECT DESIGN IS UNDERPINNED BY GENDER OR INCLUSION ANALYSIS, OR THAT PROJECTS ENVISAGE GENDER/LNOB TRANSFORMATIVE RESULTS.

As was the case regarding human rights, the general lack of data on gender mainstreaming, vulnerability and equity in the anti-corruption landscape was highlighted by Mexicanos contra la Corrupción y la Impunidad Report (Ramírez, 2020). The portfolio did not bridge this gap: the evaluation team found almost no gender-based analysis (women, men, girls, boys) in terms of barriers or access to anti-corruption mechanisms. The
evaluation found no equity-based analysis or research on empowerment measures for the most groups vulnerable to corruption (whether as victims, perpetrators, or both) underpinning the projects as a whole, or as a deliverable.

The portfolio has intervened - if not in a gender-sensitive, responsive, or transformative partnership environment – at least with gender-balanced partner institutions and organisations. Overall, the projects’ counterparts and participants were fairly gender balanced. Our survey recorded 54.42% of women respondents, and 43.81% of men respondents (a few respondents did not wish to answer). Even once correcting for classical survey bias (women tend to respond to surveys more than men), this shows a balanced gender picture. The same pattern was found among interviewees, including in decision-making positions. These patterns and the portfolio’s focus on prevention would have lent itself well to a gender transformative approach and to Leaving no one behind by targeting groups who are most vulnerable to corruption.

Yet, there was only sporadic evidence of some efforts to mainstream or target gender equality or the most vulnerable, such as building on traditional indigenous practices to curb corruption report. The events observed and the deliverable analysed (reports, research products, awareness raising material, training material) did not usually consider the specific needs of women, girls, men, and boys, nor of particularly vulnerable groups (sensitiveness). In general, they did not seek to respond to gender inequality or inequities (responsiveness), nor did they usually seek to address their root causes (transformation). For instance, there was no evidence of specific training modules on the gendered aspects of corruption, nor on the impact of corruption on particularly vulnerable groups. The projects usually limited themselves to encouraging gender balance during events and “counting women” participating in activities (53.7% of the public officers trained are women and 59.2% of participants from non-governmental organizations are women). Groups in situations of vulnerability, including those most affected by poverty, were not targeted in project design, nor were included even though a correlation exists between corruption and income inequality indicators highlighted in the 2019 Human Development Report by the United Nations Development Program.

The MEXW41 is the only project that genuinely mainstreamed gender into the analytics to assess budget performance in the results-based budget preparation in the State of Nuevo Leon. However, the project did not include Leave no one behind perspective too (e.g., migrants, being a state located in Northern Mexico, or victims of domestic violence, as examples). There are a few other examples of activities which intentionally target the inclusion of women in activities and access of vulnerable groups:

- Under the project MEXW26 project, a set of activities piloted a corruption prevention model with a sample of five public schools located in low-income areas (the metropolitan area of the city of Zacatecas, including the municipalities of Guadalupe and Fresnillo), which could be seen as incorporating a leaving no one behind approach,
- Regarding MEXW41 project, performance-based budgeting should have included the possibility to disaggregate data by gender, and a LNOB perspective,
- Under the MEXAB5 Project, as the Secretaría de la Función Pública initially focused on a gender plan in the recruitment of public officials in the Federal government but achieved only one-time off event.
- During the MEXAB5 implementation, efforts were made to involve women in diverse activities. In addition, the project engaged indigenous women in the case of the state of Quintana Roo. Another example was a locally adapted educative model on gender and corruption, also in Quintana Roo.
- Several trainings or workshops in various projects ended with specific recommendations for anticorruption actors to use state-of-the-art technologies to increase access to information in general (e.g., Chatbots and WhatsApp tools built up in the Transparency portal of the State of Nuevo Leon’s Comptroller).

On the other hand, the interviewees in northern and southern Mexico (Nuevo León and Quintana Roo States, respectively) indicated that there was demand for support from State-level initiatives to adopt inclusion approaches. For example, in Nuevo León, with funds from MEXAB5 project, the Comptroller Office’s webpage
was redesigned to fit needs of visually impaired people. This corresponded to an express demand of the Comptrollership. In the State of Quintana Roo, the Anti-corruption Prosecutor Office intends to issue publications in Maya and other languages, and expressed an urgent need for support, hoping that future projects might meet it. To sum up, the portfolio evaluation team found scarce evidence of inclusion or targeting of gender equality and of vulnerable groups. Sharing international good practices may make it more likely that counterparts get exposed to good practices that mainstream gender and inclusion (e.g., of persons with disabilities, the poor, indigenous communities, the migrants to the U.S.)
In a complex and changing environment, rather than fully developing a strategic and structured portfolio, the office has worked chiefly on the preventive aspects of anticorruption, seeking to create, and responding to, a demand by the vast array of relevant authorities in Mexico. The evaluation showed (Findings 1, 2 and 3) that the office undertook creative and innovative adaptation to pragmatically carve a space for UNODC in the anti-corruption landscape of Mexico, by responding to ad hoc demands first, and then by shifting the centre of gravity of its activities from the Federal to the State level. But sustaining this approach in the long run may be challenging, as shown by Findings 11 and 12. To ensure greater UNODC presence in Mexico’s anti-corruption landscape, the portfolio would require considerable administrative, procedural, and methodological adaptations.

The innovative peer-review mechanism among Mexican States, pioneered and piloted by the portfolio under the MEXAB5 project, is highly relevant, perfectly suited to UNODC’s mandate, and extremely promising. It could be reproduced in other federal or highly decentralised countries – however, it requires agile project management and administration, as it multiplies the number of partners and requires complex logistics. Should UNODC choose to pursue such initiatives, it will need to develop a clear product, specify intended results and impact, and incorporate sustainability measures.

The Mexico segment of the GLOZ99 programme can be considered a success story, from which learnings could be drawn for future developments of UNODC’s anti-corruption portfolio as for planning, implementation, monitoring, administration, and partnership building at the national level. Taking into account that the private sector is the most likely available source of funding for ensuring a multi-country or country-specific follow-on, the project is now well positioned to keep growing, by building on the strong partnerships established with highly committed higher education institutions (e.g., Tecnológico de Monterrey --Tec de Monterrey, Instituto Tecnológico Autónomo de Mexico --ITAM, and Instituto Politécnico Nacional -- IPN) and with energy and pharmaceutical private firms.

In the context of shrinking international funding opportunities, interviews with key partners and interlocutors lead the evaluation team to conclude that Government partners at national level, but also States as potential donors, require UNODC to make stronger, tangible cases for proposed project interventions (Findings 2, 3, 6, 8, 9, 11). The participants want to know what type of learnings, practical tools, and incentives to act against corruption they may derive from cooperation with UNODC.

In that sense, an important conclusion of the evaluation is that the portfolio has neither generated nor managed knowledge for itself in a satisfactory fashion (based on findings 4, 5 and 6), even as it developed knowledge products for its partners. This shortfall extends to knowledge on the human rights, gender equality, and LNOB aspects of corruption, and on the impact of the portfolio’s own actions in these cross-cutting areas (Findings 13 and 14). Although sporadic efforts were made to tackle corruption from a human rights perspective throughout UNODC Mexico’s pillars, this was often an individual contribution of project managers, and not fully aligned with the demands of partners and donors.

Related to knowledge management and to project cycle management, the evaluation concluded (Findings 5, 6, 9, and 10) that the situational and contextual awareness of the portfolio was insufficiently informed by benchmarking and monitoring, particularly as regards the tracing of results and outcomes (e.g., regarding behaviours and attitudes), as well as likely contribution to impact. The evidence generated by the projects either focused narrowly on activities and outputs, or took stock of the broader indicators, but without showing the link to the projects, or the contribution of these project to those indicators. Demand-driven project without clear strategic vision do not lend themselves well to informing global indicators on corruption as the latter require measuring changes in terms of outcomes and behaviours of the stakeholders.
Overall, the portfolio’s effort to remain relevant and visible in a particularly challenging and changing environment was over-ambitious, which led to the multiplication of partnerships and activities beyond the office’s management capacity. Compounded by complex donor requirements in some cases, this has led to recurrent delays in budget execution and cumbersome management and logistics in at least the portfolio’s flagship project. The procurement and administrative procedures of UNODC and key international donors have proved beyond the level of capacity of the UNODC Mexico Office and of some of the projects, which could not at the same time remain relevant through adaptative selection of partners and keep implementation on track (Finding 5).

The combination of these factors has affected considerably the standing of the UNODC anti-corruption portfolio in Mexico, especially on the Federal level and among donors, as reported by interviewees from multiple types of stakeholders (also see Lessons Learned and Annex VI). The State-level interventions have been relatively more productive, but they are vulnerable, especially because in the short to medium run, predictable and viable funding sources for the continuation of the portfolio are very scarce (Findings 1, 2, 4, and 11) and the projects developed as ‘umbrellas’ proved challenging due to administration constraints (Findings 1, 5, 12).

The evaluation points to the importance of continuous monitoring (Finding 8, and 11) to deepen the understanding of the current situation and adapt the portfolio to the changing circumstances both in the short and medium term.
IV. RECOMMENDATIONS

RECOMMENDATION 1 – FURTHER INCREASE THE STRATEGIC FOCUS OF TECHNICAL ASSISTANCE AND SEIZE OPPORTUNITIES FOR SCALING UP ANTI-CORRUPTION SUPPORT TO MEXICAN STATES

UNODC Mexico’s Area for Programming (i.e., Anti-Corruption Project Team), by building on UNODC’s innovative collaboration with Mexican States for the implementation of UNCAC recommendations at the State level, should develop a concept note for further increasing the strategic focus of technical assistance on anti-corruption to State-level counterparts. The concept note should be developed in consultation with Mexican States and pay special attention to identifying ‘quick win’ opportunities, based on the technical assistance needs expressed by counterparts (including those specified in the existing matrix drawn by UNODC Mexico) and available funding.

Expected benefit: By developing the strategic concept note, UNODC will benefit from highlighting the evidence from either local or international experience of what might work to prevent different types of corruption. Developments in target States would potentially have a demonstration effect and act as a catalyst in other States (for instance, in neighbouring areas), thus increasing the probability of having a project pipeline of UNODC to discuss with representatives of State governments. To help fulfil this potential, UNODC Mexico should organize donor meetings at each State for discussing the action plans developed and its expected financing.

Based on finding 7 (Effectiveness), and 11 and 12 (Sustainability).

Expected timeframe for implementation: 6 months.

RECOMMENDATION 2 – INCREASE THE FOCUS ON EDUCATION TO INTEGRITY FOR STRENGTHENING THE SUSTAINABILITY OF UNODC EFFORTS ON ANTI-CORRUPTION IN MEXICO

UNODC Mexico’s Area for Coordination, by building on the sound design, strong partnership building, and effective implementation of the GLOZ99 project, should increase its focus on education to integrity in higher education in partnership with the private sector, in consultation with the Regional Hub on Preventing and Countering Corruption and with the Corruption and Economic Crime Branch (CEB) in UNODC Vienna Headquarters.

Expected benefit: While focusing in the short-run on further developing this successful project—which is results-oriented, highly appreciated by all counterparts, and likely to yield lasting impact if continued and ideally scaled up–, UNODC Mexico will have the opportunity to invest in strengthening the foundations (in terms of knowledge management and research, resource mobilisation, partnerships development, and strategic planning and programming) for increasing in the long run the strategic focus and sustainability of its anti-corruption efforts in Mexico.

Based on findings: 1, 2, 4 (Relevance), and 11 (Sustainability).

Expected timeframe for implementation: 6 months.

RECOMMENDATION 3 – DEVELOP A FULL-FLEDGED ROADMAP FOR FUTURE WORK ON ANTI-CORRUPTION IN MEXICO

UNODC Mexico’s Area for Coordination should elaborate a full-fledged roadmap for UNODC’s future work on the prevention and fight against corruption and economic crime in Mexico, in consultation with the Regional Hub and
CEB in HQ. The roadmap should be based on the analysis of the state of play in Mexico’s anticorruption landscape and the results and good practices of the evaluated projects, take into account the UNCAC recommendations stemming from the IRM (Annex VII), and the priorities agreed at the 2022 Regional Summit on the Platform for UNCAC. The roadmap should specify how, and through which approaches and steps, the UNODC Mexico intends to support the Mexican authorities to fulfil these recommendations, bearing in mind the federal and State-level anti-corruption policy framework. In other words, it requires matching the different integrity and transparency shortfalls identified, with different risks of corruption, and then, with different UNODC’s capacities and services to be offered to key donors and stakeholders, all aligned to the UNODC’s regional strategy and the Convention. This will allow a clear route to systemic change, with benchmarking references including the Financial Action Task Force (FATF) strategy development and mutual evaluation mechanisms, the Open Government Partnership National and Subnational Action Plan development and assessment processes, and the OAS Anti-Corruption Mechanism.

Expected benefit: This exercise will clarify the goals and vision for the future portfolio, reduce fragmentation of priorities, efforts, and funding, and improve planning and implementation.

Based on findings 1, 2, and 5 (Relevance), and 11 and 12 (Sustainability).

Expected timeframe for implementation: 12 months.

**RECOMMENDATION 4 – STRENGTHEN PARTNERSHIPS AND DEVELOP EVIDENCE-BASED, STRUCTURED MODULAR SUPPORT ON ANTI-CORRUPTION IN MEXICO, CHIEFLY TARGETED TO STATE-LEVEL ENTITIES**

UNODC Mexico’s Area for Coordination should design a structured modular offer of support for corruption prevention efforts, chiefly targeted at State-level partners, in consultation with the Regional Hub and CEB in HQ. Building upon previous successful efforts at the State-level (e.g., peer-to-peer evaluation among States, support to CPCs, inclusion of anti-corruption in universities’ curricula), this “evidence-based menu” could include core support (e.g., basic training on UNCAC, peer review and peer support) and packages of add-on optional modules (e.g., support to CPCs, work in educational and higher education institutions, outreach to/sensitisation of vulnerable communities...), and lead to individual tailored agreements containing exit strategies.

Expected benefit: This approach would potentially enable UNODC in Mexico to scale up its unique experience of support at the State level, where the bulk of the demand and needs are unaddressed —while noting that such scaling up would pose institutional, operational and resource constraint related challenges.

Based on findings 1, 2, 4 (Relevance), 8 and 9 (Effectiveness), and 11 (Sustainability).

Expected timeframe for implementation: 24 months.

**RECOMMENDATION 5 – FURTHER INVEST IN KNOWLEDGE MANAGEMENT AND RESEARCH.**

UNODC Mexico’s Area for Coordination should invest in knowledge generation and knowledge management to support a future portfolio on anti-corruption in Mexico, in consultation with the Anti-Corruption Project Team in the Country Office, as well as with CEB in HQ and the Regional Hub. To ensure adequate investment in knowledge management and research, in the development of a future portfolio, specific agreements should include and allocate resources to research and other evidence-generation activities (for instance, literature reviews), according to the nature and context of each project.
Expected benefit: In addition to being useful to inform decision-making, investing in knowledge management and research on anti-corruption would be beneficial in the longer run to inform the dialogue with the Mexican government on the future expectations of UNODC’s anti-corruption portfolio in the country.

Based on findings 2, 3, 4, 5 and 6 (Relevance), 8 and 9 (Effectiveness), and 11 (Sustainability).

Expected timeframe for implementation: 24 months.

RECOMMENDATION 6 – STRENGTHEN RESULTS-BASED MANAGEMENT AT THE PROJECT LEVEL

In the design of a future portfolio on anti-corruption in Mexico, UNODC Mexico’s Area for Programming (i.e., the Anti-Corruption Project Team) should elaborate for each project a set of indicators at results level, with resources dedicated to monitoring and reporting results both at the output level and at the outcome level. Given the dynamic nature of the portfolio, attention should be paid to developing indicators that capture change over time, and which can be fine-tuned or retrofitted throughout implementation.

Expected benefit: Measuring and monitoring results would allow both to trace the future portfolio’s contribution to outcomes and impact, and to demonstrate its worth to partners and donors. The peer-to-peer review mechanism, for instance, would benefit from indicators that focus on the changes in the normative framework and its implementation aligned with the UNCAC, beyond tracking the number of participants in workshops as currently done.

Based on findings 5 and 6 (Relevance), 8, 9 and 10 (Effectiveness), and 11 (Sustainability).

Expected timeframe for implementation: 24 months.

RECOMMENDATION 7 — STRENGTHEN ADMINISTRATIVE COMMUNICATION AND COLLABORATION WITH UNODC HEADQUARTERS.

UNODC Mexico (i.e., Areas for Programming and for Operations) should strengthen its communication and collaboration with the Division for Management (i.e. HRMS) and the Division for Operations (i.e. RSLAC) to better identify the challenges faced administratively as well as their root causes, and to propose solutions drawing from good practices and lessons learned from other Field Offices, with a view to strengthening procurement and administrative procedures as well as project management capabilities in UNODC Mexico. Special consideration should be given to options for packing items into larger contracts to minimize granularity.

Expected benefit: Strengthened communication and collaboration with HQ on the administrative front—for instance, by conducting, in consultation with relevant sections in HQ, an assessment of the administrative processes affecting the implementation of anti-corruption efforts in Mexico—will help distinguish circumstantial challenges (i.e. those posed by the COVID-19 pandemic) from more structural challenges, and increase UNODC Mexico’s capacity to anticipate and manage potential risks, achieve results, and account for both the international and local funds to be invested by the future donors.

Based on finding 5 (Relevance).

Expected timeframe for implementation: 24 months.
LESSONS LEARNED

Tight earmarked financing mechanisms may overstretch management capacity, especially in contexts where swift adaptation of strategic partnership is required: Based on findings 1, 5, and 12, the first generation of projects were developed largely within ‘umbrella’ or ad-hoc models, which is unsustainable. Resources have existed, but they have proved difficult to channel and to manage. Following this, UNODC Mexico has sought to move to more strategic projects. However, when mobilising resources for its anti-corruption model in the context of tight earmarking, the office could have undertaken a feasibility assessment of constraining funding modalities, which would have been useful to anticipate and mitigate the risks inherent to this funding modality.

This has led to over-ambitious project engineering, scattered partnerships and activities, and overstretched capacities. Limited flexibility and continuity meant that some ambitious components (e.g., involving technological systems or the establishment of new practices and know-how) proved particularly challenging, as they could not build on sufficient grounds as scaling-up efforts. These challenges were compounded by the COVID-19 pandemic.

The lack of investment of Headquarters’ thematic backup for structured, predictable programming makes portfolios vulnerable: The interviewees in Mexico and in Vienna concur that the portfolio did not benefit from upfront investment in research and portfolio design from UNODC headquarters. As an organisation, UNODC did not develop nor promote "products of excellence" building its anti-corruption UNODC mandate, which could have formed the backbone of the Mexico Office’s portfolio. In developing projects and anti-corruption portfolio, the personnel of the UNODC in Mexico have received only marginal organizational support, limited good practices from other offices of the region (e.g., from the UNODC Regional Office in Colombia - ROCOL), and some feedback regarding project documents. Some interviewees in Mexico and in headquarters explained their perception that, given the funding structure of UNODC (with less than 10% core funding, and most of the staff costs funded by donor contribution) “there is no incentive for headquarters to contribute to modelling project designs unless it is a global project that will contribute to the headquarters’ priorities and activities”.

The portfolio development could have offered the thematic unit in headquarters an opportunity to use the Mexico Office (and possibly others) to pilot a headquarter-designed model programme that could have been further perfected, expanded, and replicated elsewhere. Instead, the Mexico Office was left to develop and expand a portfolio without the resources for upfront investment, and in a context of constant existential quandary: as salaries are linked to specific projects, the UNODC in Mexico struggles to maintain a sufficient level of funding to preserve its personnel. The preparation of the projects’ technical and financial proposals sought to cater to the needs of both internal and external clients (donors and Mexican public institutions, both at the Federal and State level) for approval. This incentivises a pragmatic, demand-driven approach with high personnel turnover, which left no space for strategic reflection or strategic programming. In turn, this situation prevents the portfolio from satisfactorily follow-on projects based on its predecessors.

BEST PRACTICES

The portfolio invested under-served niches to convene unusual partners for the implementation of the UNCAC: UNODC has capitalized on its comparative advantages in a particularly innovative fashion in all projects. For instance, GLOZ99 –developed at HQ in Vienna with dedicated resources for design– offers a match between
resources, quality of design, partnerships, and scale, and focuses in under-served areas of anti-corruption where there is high demand and high interest (the nexus between higher education, anti-corruption systems at State level, and the private sector). The project involves the networking of the energy and pharmaceutical companies with universities, to set up the basis for compliance and good practices in the private sector based on the UNCAC. All key stakeholders (UNODC, partners and donor) acknowledged the project as distinctive line of work that may be scaled up to other sectors in the future (health, software and hardware, and public works). Despite suffering a 2-year lag in launching because of the COVID-19 pandemic, the GLOZ99 project appears as the most representative of UNODC’s potential as a convener in an anti-corruption niche which is under-explored by other national and international actors.

In the MEXW26 and MEXAB5, over the years, UNODC has been able to use its neutral role as a guardian of the UNCAC to network anti-corruption peers from various States thanks to a highly innovative idea: the transfer to the inter-State level (i.e., within Mexico as a federal country) of the UNCAC international peer-to-peer review mechanism (MEXAB5 project) – in line with a recommendation to the Mexican State on behalf of the Global Revision Mechanism of UNCAC, to perform a comparative assessment of the subnational level. The projects organised and facilitated peer review among “sister” institutions from voluntary States. For each review, one State was reviewed by two other States. Each State involved gained experience both as reviewee (once, by two different States) and as reviewer (twice, for two different States), and within each review the respective institutions were networked. This highly innovative approach enabled the UNODC and its partners to adjust the framework of the UNCAC to a federal context, thus ensuring relevance to the Convention, to the constitutional and legal framework of Mexico, and to the needs of the citizens as end beneficiaries, who mostly depend on State-level institutions to be protected from corruption. In the MEXW41, the project championed the blending of integrity mechanisms, development project selection and granting by State institutions, and an SDG-oriented lens: it supported the mechanisms through which State development executive agencies selected applications for project support towards the realisation of the SDGs, while building in ethics, integrity, and prevention of conflict of interest. This was an innovative way to support prevention of corruption while incentivizing pro-active integrity mechanisms. These good practices are highly reproductible to other federal and/or highly decentralised countries. It would have been impossible for any other actor, but UNODC in the capacity of guardian of the Convention.

Focused partnership building (i.e., with partners having low vulnerability to changes in the political context) increased resilience and improved resource mobilization: Anti-corruption projects interventions are politically sensitive and vulnerable to changes in the implementation phase. In this context, GLOZ99 is paying off very well for UNODC Mexico office and HQ because it involves the participation of the private sector and mostly private universities -as opposed to projects with involvement of government institutions, which are vulnerable to shifts in political priorities. GLOZ99 project may be considered as an example of satisfactory level of respect and reputation at UNODC field office, headquarters, and donors. Other projects such as the MEXAD4, and MEXW72 focused on asset recovery, also managed to maintain a fair level of interaction with their partners, because, while they transited from the Federal to the State level after the Federal level authorities withdrew, they selected a small number of partner States. This prevented dispersion of capacity while allowing to keep a reasonable geographic coverage, maintain a close relationship and a more in-depth dialogue, and operate a manageable volume of activities.
## I. BACKGROUND AND CONTEXT

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<th>MEXW26</th>
<th>MEXW41</th>
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## Annex I: Terms of Reference

### Review Mechanism

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<th>Linkages to UNDAF’s strategic outcomes to which the project/programme contributes(^{14})</th>
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<th>Direct effect 9</th>
<th>Direct effect 11 and 12</th>
<th>9.8; 9.4 and 9.5. Direct effect 9.</th>
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| Executing Agency (UNODC office/section/unit): | 
|---|---|---|---|---|---|---|
| Partner Organizations: | Ministry for the Public Administration | Ministry of Finance of the government of the state of Nuevo León | Universidad Anáhuac, IPN, ITAM, UP, TEC Monterrey, Siemens Energy México, Bayer de México, Novartis México, | Mexico City General Comptroller Office (CGCDMX) | National Banking and Securities Commission (CNBV) | Implementing partners: UNDP and UNEP |
| Local anti-corruption systems | 

\(^{14}\) United Nations Development Assistance Framework
<table>
<thead>
<tr>
<th></th>
<th>Pfizer México, BK Energy, Servier, Covestro México, BNR, Janssen México</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Approved Budget (USD):</strong></td>
<td>$1,600,000</td>
<td>$1,600,088.26</td>
</tr>
<tr>
<td></td>
<td>$162,403.20</td>
<td>$1,235,537</td>
</tr>
<tr>
<td></td>
<td>$378,920</td>
<td>$378,920</td>
</tr>
<tr>
<td><strong>Total Overall Budget (USD):</strong></td>
<td>$434,372.8 USD</td>
<td>$2,096,366.00</td>
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<tr>
<td></td>
<td>$1,000,000</td>
<td>$567,712.00</td>
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<tr>
<td></td>
<td>$1,235,537</td>
<td>$1,235,537</td>
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<tr>
<td></td>
<td>$378,920</td>
<td>$378,920</td>
</tr>
<tr>
<td><strong>Total Expenditure by date of initiation of evaluation (USD):</strong></td>
<td>$357,762</td>
<td>$1,530,409.86</td>
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<tr>
<td></td>
<td>$452,779 until June 2019</td>
<td>$79,543.16</td>
</tr>
<tr>
<td></td>
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<td>$108,007</td>
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<tr>
<td><strong>Donor(s):</strong></td>
<td>USAID</td>
<td>Tax Administration Service (SAT); Ministry of Finance of the government of the state of Nuevo León</td>
</tr>
<tr>
<td></td>
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<td>Ministry of Finance of the government of the state of Nuevo León</td>
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<td>Siemens</td>
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<td></td>
<td>Mexico City General Comptroller Office</td>
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<td></td>
<td>United States of America</td>
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<tr>
<td></td>
<td></td>
<td>Merida Initiative (INL)</td>
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<tr>
<td></td>
<td></td>
<td>Joint Sustainable Development Goals Fund (Joint SDG Fund)</td>
</tr>
</tbody>
</table>
# IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

<table>
<thead>
<tr>
<th>Name and title of Project/Programme Manager and UNODC office/section/unit:</th>
<th>Luz María Guzmán Project Coordinator/LPOMEX/Anticorruption</th>
<th>Luz María Guzmán Project Coordinator/LPOMEX/Anticorruption</th>
<th>Laura Bertipaglia Project Associate/LPOMEX/Anticorruption</th>
<th>Luz María Guzmán Project Coordinator/LPOMEX/Anticorruption</th>
<th>Marco del Toral Project Coordinator LPOMEX/Environmental crime</th>
<th>Roberto Murguía Project Coordinator/LPOMEX/Anticorruption</th>
</tr>
</thead>
<tbody>
<tr>
<td>(UNDP Mexico); Ministry of Public Administration of Zacatecas (Zacatecas); Embassy in Mexico of the United Kingdom (UK).</td>
<td>(UNDP Mexico); Ministry of Public Administration of Zacatecas (Zacatecas); Embassy in Mexico of the United Kingdom (UK).</td>
<td>(UNDP Mexico); Ministry of Public Administration of Zacatecas (Zacatecas); Embassy in Mexico of the United Kingdom (UK).</td>
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<td>(UNDP Mexico); Ministry of Public Administration of Zacatecas (Zacatecas); Embassy in Mexico of the United Kingdom (UK).</td>
</tr>
<tr>
<td>Time frame of the project covered by the evaluation (until the end of the evaluation field mission/data collection phase):</td>
<td>Mexico (country level)</td>
<td>Mexico (country level)</td>
<td>Nuevo León, Mexico (state level)</td>
<td>Mexico (country level)</td>
<td>Mexico City, Mexico (state level)</td>
<td>Mexico (country level)</td>
</tr>
</tbody>
</table>
IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

<table>
<thead>
<tr>
<th>Budget for this evaluation in USD\textsuperscript{15}:</th>
<th>$40,000.00</th>
<th>0</th>
<th>$20,000.00</th>
<th>0</th>
<th>0</th>
<th>0</th>
<th>$20,000.00</th>
</tr>
</thead>
</table>

Number of independent evaluators planned for this evaluation\textsuperscript{16}: |

| Type and year of past evaluations (if any): | Internal assessment from January 2019 - July 2019. | IDE of global programme GLOZ99 in 2021 |

\textsuperscript{15} Including fees for evaluation team, travel, printing, editing, translation, interpretation, etc.

\textsuperscript{16} Please note that the minimum for any UNODC evaluation is two independent evaluators, i.e., one Evaluation Expert and one Substantive Expert in the subject area of the project to be evaluated.
Overview of UNODC’s work on anti-corruption in Mexico

In 1996, the Government of Mexico and the Governments of Central America, through their embassies accredited in Mexico, signed a Memorandum of Understanding through which they committed to work together with UNODC to address drug and crime problems in the region. The memorandum was the precedent for UNODC and the Government of Mexico to enter into a Headquarters Agreement for the establishment of the Regional Office for Mexico and Central America in 2003. With this agreement, the legal personality of the Office in Mexico was recognized and in 2008 a Cooperation Agreement was signed establishing the modalities of cooperation between UNODC and Mexico. Finally, on October 15, 2012, a new agreement was signed granting the UNODC Office in Mexico (LPOMEX) the functions of a Liaison and Partnership Office.

UNODC’s anticorruption work is guided by the United Nations Convention Against Corruption (UNCAC). Besides being the custodian of international treaties and the secretariat of global standard-setting bodies, UNODC in Mexico conduct rigorous research and policy analysis and bring together technical expertise and a broad field presence to provide specialized normative, research and technical assistance in crime prevention, crime response and justice delivery for the promotion of strong accountable institutions in the country. As part of its anti-corruption mandate, UNODC in Mexico collaborate with national, state and local governmental institutions, as well as businesses, academia and CSOs, to strengthen the anti-corruption agenda in the country, mainly through prevention programmes and activities. In particular, UNODC works together with institutions belonging to the National Anti-Corruption System to strengthen accountability and integrity in public procurement processes, enhance transparency in public reporting and promote citizens’ participation in social comptrollership activities.

As a main result of its anti-corruption work, the role of UNODC Mexico as a respected technical agency on anticorruption matters in the public and private sector, as well as in civil society, has been strengthened during the past years. Thanks to UNODC Mexico’s technical assistance, Mexico could make progress in complying with the recommendations resulted from the First and Second Review Cycle of the UNCAC, such as: the implementation of coordinated anti-corruption policies at the national and state level, thanks to the exchange of good practices promoted by the National Review Mechanism developed by UNODC Mexico and the enhancement of integrity and transparency in public procurement and finance, by strengthening integrity in small and medium businesses in the country from vulnerable sectors.

UNODC, along with the agencies, funds and programs that integrate the United Nations System in México, contributes to the efforts of Mexico to comply with the 2030 Agenda. The base document to guide the UN system’s efforts is the “United Nations Cooperation Framework for Sustainable Development in México”. Within this cooperation framework, through the implementation of live projects in 2021, UNODC contributed to the National Development Plan, the Civil Service Sectorial Plan, the National Program to Combat Corruption and Impunity and Improve Public Management and the National Anti-Corruption Policy.

Specifically, the field office supported the implementation of the UNCAC at all levels of government, and contributed to: (i) the consolidation of transparency, accountability and Performance Evaluation System mechanisms in subnational governments; (ii) the promotion of education and integrity initiatives to promote social controllership and ethical decision making in the private sector; (iii) efforts to prevent and combat corruption, in particular in sectors such as customs and sports; and (iv) the strengthening of the institutional framework and capacities in the identification, recovery and reintegration of assets derived from corruption.

The MEXW72 purpose is to raise awareness about negative impact of money laundering, specifically the consequences on society and how it enables activities on organized crime; how the seemingly innocuous activities by private citizens, such as allowing their bank accounts to be used by third parties, can contribute, and facilitate money laundering and related criminal activity.

The main achievements of the project were: general perceptions about money laundering were gathered from different stakeholders through telephone surveys, working groups, SWOT analysis of the Mexican Government in the prevention and fight against money laundering and mapping and analysis of reporting channels to find the appropriate channel for the campaign. Likewise, the campaign strategy was designed.
The objective of the MEXW41 project is to contribute to the development of technical-operational capacities in Public Budgeting for Results area in the State of Nuevo Leon, contributing to the strengthening of transparency and accountability mechanisms, to the improvement of decision-making in the allocation of public resources, and to the consolidation of cross-cutting budgetary policies for equality and sustainable development.

The target area of focus is the subnational state, and the main counterpart is the Ministry of Finance of the Government of Nuevo León. Two key results of the project are: (i) the institutional culture for results-based management has been strengthened in Mexico with the design and implementation of a training model; and (ii) the Integral Performance Evaluation System of Nuevo León (SIEDNL) was designed and implemented (outcome 4).

The project contributed to strengthening the programmatic structure and the monitoring and evaluation processes (outcome 3). An index for the strategic selection of programs and/or funds to be evaluated was designed and implemented, which was used to develop a multi-year evaluation agenda. All 2017 and 2018 SAP evaluations were carried out, terms of reference for strategic evaluations were developed, TdR developed for impact evaluations, and designing new ones for federal funds from Branches 28 and 33.

The MEXW26 is an umbrella project that includes seven projects (outcomes). Its general objective is to provide technical assistance to contribute to the mainstreaming of the fight against corruption in to different federal, state and municipal counterparts, as well as private sector, CSOs and academia, to strengthen their capacities and programmes to prevent and fight against corruption.

One of the main achievements of MEXW26 was the action and coordination protocol for the General Administration of Customs of Mexico, a tool developed as part of the project to strengthen anti-corruption policies. In partnership with UNDP in Mexico and over 20 national leading business chambers, the Corporate Integrity Program of the Ministry of Public Administration was strengthened by developing an Integrity Toolkit for SMEs from vulnerable economic sectors. At the state level, in collaboration with the Ministry of Public Administration of Zacatecas, the state Programme on promoting good citizenship values and principles was redesigned and strengthened.

To strengthen the Mexican National Anti-Corruption System, UNODC Mexico, in collaboration with the UK Embassy in Mexico, developed the methodology for the UNCAC National Review Mechanism at the state level in Mexico, which was piloted in three states and developed a report on international best practices to develop the analytical framework to measure, monitor and evaluate corruption cases and anticorruption policies. The report supported the development of the Corruption Monitoring and Evaluation Model (MOSEC) of Mexico. Finally, in collaboration with the Executive Secretariat of the National Anti-Corruption System and the national sports commission, UNODC developed different tools aimed at strengthening integrity in sports institutions, such as a Code of Good Governance, manual to support its implementation, monitoring and evaluation framework, process mapping and a methodology for managing corruption risks in the sports sector.

Project MEXAD4 is derived from a joint SDG Fund Programme implemented in Mexico. Its main goal is to strengthen the governance of the Mexican financial system for sustainable development, by improving the State Anti-Corruption Attorneys’ processes to engage in corruption-related financial investigations aimed at recovering stolen assets. The Programme is implemented through a three-pronged strategy between UNODC, UNDP and UNEP. UNODC leads all inter-agency coordination and specifically assists relevant Mexican authorities at the subnational level to strengthen the institutional framework and capacities to identify, recover and integrate assets resulting from corrupt criminal activities. Project activities include assessing the normative framework, institutional capacities, and organizational structures; formulating recommendations; and developing a capacity-building strategy.

The purpose of project MEXAB5 is to support the Government of Mexico’s (GOM) efforts to increase transparency, accountability, and citizen participation through a series of pilot initiatives with scalable results. This will be accomplished through collaboration with GOM counterparts in the federal executive branch,
autonomous oversight institutions, and targeted subnational government entities, in collaboration with civil society. The project is structured in four components:

- **Component 1: Prevention and management of conflicts of interests in public administration:** UNODC will work with subnational government agencies that are most vulnerable to conflicts of interest in order to build their capacity to identify, declare, and manage these conflicts. UNODC anticipates working with States’ Comptrollerships and the órganos internos de control (OICs) of GOM agencies. The nature of their work makes them vulnerable to corruption: issuing subsidies, licenses, permits and authorizations, public procurement, verifying compliance of norms, imposing sanctions and administrating processes where citizens are involved.

- **Component 2: Empowering Citizens in the Fight Against Corruption and Impunity:** UNODC will work with the GOM to improve upon existing tools for citizen participation in order to strengthen access to information and foster the use of open data, research, citizen reporting to target corrupt actors. Illustrative tools may include, for example, programs similar to Social Witnesses, in which citizens monitor government procurements; Anti-Corruption Radar (RAC), Comprehensive System for Citizen Reporting (SIDEC), and others to be determined.

- **Component 3: Strengthening Integrity in Public Procurement Processes:** UNODC will work with private sector businesses to develop internal ethics and integrity practices and improve transparency in their interactions with GOM procurement processes. To that end, UNODC will develop a Monitoring and Evaluation Framework to help companies to monitor the implementation and evaluate the impact of their integrity programs to prevent and detect corruption within the organization. The framework will also support companies to verify compliance with Article 25 of the General Law of Administrative Responsibilities, the National Anticorruption Policy (PNA), the national normative framework on public procurement, UNCAC framework and international best practices in that area.

- **Component 4: National Peer Review Mechanism for Local Anti-corruption Systems** Using the UNCAC as a model, this component will implement a peer review, between and among Mexican states, of their implementation of anti-corruption efforts and legal frameworks. As of April 2019, one state (Sonora) legal frameworks for their local anti-corruption system have been reviewed. This component will oversee the review of the remaining 31 states and will also assist the state already reviewed to implement the recommendations from the review process related to national-level anti-corruption review and UNCAC compliance.

Over a period of three and a half years, UNODC provides technical assistance to the following partners: the Comptrollerships of Ciudad de México, Coahuila, Guanajuato, Jalisco, Nuevo León and Quintana Roo; the private sector; civil society organizations; academia; and the 32 Local Anti-corruption Systems in the 32 states of Mexico in order to strengthen their capacities to prevent and fight corruption by using international best practices and standards, in order to implement a sustainable and co-responsible anti-corruption policy in Mexico.

**UNODC’s Global Integrity Education Project,** a segment 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 (GLO299), aims at bringing together business and academia to: (i) develop and implement an innovative integrity education programme in companies and universities; and (ii) equip young graduates with ethical mindsets and strategies at the start of their careers in the private sector, and empower them to become a driving force for ethical business and foster ethical decision-making in the private sector. The project is being implemented in Mexico, as well as in Kenia and Pakistan, and is funded by the Siemens Integrity Initiative. As a result of the implementation of the Global Integrity Education Project in Mexico, 8 UNODC University Modules on Integrity, Ethics and Anti-Corruption have been contextualized and adapted to the anti-corruption local context of Mexico. To ensure local relevance, these modules were adapted by local Working Groups composed of key business managers and academics who contextualized the modules and enriched them with references to the national and local anti-corruption legal framework, anti-corruption initiatives and case studies of actual integrity challenges in the health and energy sector.
In Mexico, the project Working Group is composed by lecturers from 5 national Universities (Anáhuac University; Instituto Tecnológico Autónomo de México; Instituto Politécnico Nacional; Tecnológico de Monterrey; Universidad Panamericana) and business practitioners mainly from the health and energy sector (Bayer; BK Energy; Novartis; Pfizer; Servier; Siemens; Covestro; Janssen; BNR). UNODC trained almost 200 lecturers from these universities on how to teach the contextualized modules in their courses to help students develop the mindsets and skills necessary for overcoming ethical challenges in their future workplace. In Mexico, more than 3,000 students from different academic backgrounds were taught on the modules and now possess increased awareness of ethical issues and knowledge of how to prevent and fight corruption in the private sector. In the following months, the project will continue to engage the students and empower them to serve as ethics ambassadors at their workplaces, as they will convert the university modules into on-the-job ethics courses in the businesses that collaborate in the project. Moreover, Guest Lectures delivered by businesses to university students on ethics and integrity will take place, as well as business-academia collaboration to support the teaching of the Modules at the universities. Gender balance is sought throughout the project, both within the Working Group and among participants of capacity building activities, and inclusive and gender-neutral language and no stereotyped gender roles are used in training materials and in project outputs.

The MEXZ95 project sought to contribute to technically and strategically consolidating the public policies and programmes of the General Comptrollership of Mexico City (CGCDMX), in compliance with the principles emanating from the United Nations Convention against Corruption in order to lay the basis for developing coordinated and effective public policies against corruption that promote the participation of civil society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability.

Regarding the main results of this project, during 2017 UNODC strengthened the prevention of corruption strategies in Mexico City through the exchange of anticorruption practices between the CGCDMX and the UK Embassy in Mexico. In particular, the UK Embassy invited the CDGDM’s personnel to UK to participate in technical workshops to strengthen their prevention of corruption capacities. Additionally, UNODC linked the implementation of the Local Anticorruption System to national processes, such as the elaboration of the National Digital Platform. Moreover, the General Comptrollership’s staff anticorruption capacities were strengthened within the framework of the Public Construction Laboratory.

To disseminate the activities of the Public Construction Laboratory of the General Comptrollership in Mexico, UNODC promoted collaboration between the National Chamber of Consulting Enterprises (CNEC) and the CGCDMX and trainings were delivered to the Comptrollership and Laboratory staff. In the context of the Building Information Modeling (BIM) Working Group, the UK Government visited the Public Construction Laboratory in Mexico, and the Mexican Comptroller General’s Office undertook to discuss BIM with other ministries and then visited the VIC. A Corruption Prevention Best Practices Review was published and presented. The presentation was attended by the Chief of the Implementation Section of the Corruption and Economics Branch at UNODC Headquarters, and the Report was presented at the CoSP: Status of the Implementation of the UNCAC. However, the change of authorities at the HCGCDMX had a negative impact because no negotiations were held to expand the project and the second funding was not available in the second semester of 2020.

II. PURPOSE AND SCOPE OF THE EVALUATION

The purpose of the in-depth evaluation is to generate evaluative knowledge about UNODC’s anti-corruption work to ensure accountability, entice institutional learning, and inform LPOMEXs decision-marking in terms of project implementation and future programming.

Regarding the scope, the evaluation will cover all UNODC projects and programme segment/s that constitute UNODC’s work on anti-corruption in Mexico, both at the strategic and project/segment level. At the strategic level, the evaluation will pay special attention to the relationship between the set of projects/segment that conform the UNODC anti-corruption portfolio in México and their contribution to the accomplishment of strategic objectives. At the project level, special attention will be paid to the projects and segments that are
deemed relevant in terms of having developed innovative products, i.e., project MEXAB5, which will be evaluated in-depth throughout the development of a dedicated case study.

Also, evaluations are conducted at the end of projects and, therefore, assessments of outcome level results, both intended and unintended and report it in relation to it is design and the elements of implementation that explain them. It captures lessons learned from implementation to inform programming, policymaking, and overall organizational learning (UNODC, 2017: 46). In that sense, their results will benefit decision makers and donors.

To contextualize, two projects (MEXW72 and MEXZ95) have completed their activities and two more (MEXW41 and MEXW26) will be completed by December 2022, for all this projects, the final evaluation benefits counterparts and funders in this cases and decision-makers, Ministry of Finance for MEXW41 and SAT, UNDP in Mexico, UK Embassy, Ministry of Public Administration of Zacatecas, SINADE and SNA for MEXW26, and Secretary of the Comptroller General’s Office of the CDMX. For MEXW72, the users of evaluation results will be the project team still in the office in terms of relevance and coherence of interventions focused on awareness campaigns and LPOMEX in terms compliance the evaluation objective.

On the other hand, MEXAB5, GLOZ99 and MEXAD4 are currently in operation. For MEXAB5, the results of the evaluation will be useful for a second phase of the project on related topics. For MEXAD4 and GLOZ99, the recommendations will allow to strengthen the evidence available to carry the final evaluation that will be applied in 2023 to both projects. The users of the evaluation results for MEXAD4 and GLOZ99 will then be the project team and the project managers.

In the case of this final evaluation approach, the assessment required to show the success and areas for improvement of the project will help informing future programming and UNODC’S anti-corruption toolkit for future replications in the relation to the scope by the counterparts and donors supporting accountability.

The projects included in the in-depth and cluster evaluation have products and experiences that can be lessons learned and some are good practices that are part of organisational learning, so having some recommendations for improving actions in a learning organization will be well received. In that sense, having recommendations that work for the adaptation and implementation would strengthen the project portfolio in UNODC.

In MEXAB5 the evaluation results will help the donor to strengthen its monitoring system and the project team, knowing the results of the management assessment in terms of harmonization of UNODC-USAID monitoring and reporting systems will help anti-corruption program manager in México to learn for upscaling of anti-corruption projects and for future USAID donor interventions.

Based on the above, the evaluation purpose is twofold, based on two complementary levels of analysis:

1) At the strategic level, it is expected that the evaluation will generate evaluative knowledge –for institutional learning, strategy development, and budget programming purposes– on the relevance, coherence, contribution to impact and sustainability of UNODC’s work on anti-corruption in Mexico (through the six UNODC projects and global programme segment covered by the evaluation) –i.e. in relation with the anti-corruption related goals established in relevant strategic documents –i.e. the UN Sustainable Development Cooperation Framework of Mexico 2020-2025 (UNSDCF); UNODC Strategy 2021-2025, UNODC Strategic Vision for Latin America and the Caribbean. The main intended users of the evaluation at the strategic level are Member States (i.e., donors and government counterparts) and UNODC Senior Management (i.e., UNODC Country Representative in Mexico).

2) At the project level, the evaluation aims at ensuring accountability as well as informing LPOMEX’s decision-making as for project implementation and future programming, and the unit of analysis will be the six UNODC projects and the segment of GLOZ99 which focus on anti-corruption in Mexico. Within each project/segment, the evaluation will pay special attention to the assessment of innovative products, for learning purposes. In addition, a case study will be developed on project
MEXAB5, given specific donor reporting requirements\(^{17}\) and its innovative and highly complex nature, as it covers the whole territory of Mexico (it is implemented in all 32 states), addresses multiple anti-corruption dimensions, and operates with numerous entities of public administrations (at the federal, state and local levels), as well as with the private sector (over 150 counterparts in total). The main intended users of the evaluation at this level are Member States (i.e., donors and government counterparts), as well as UNODC Country Representative and project/programme managers in Mexico.

### III. EVALUATION CRITERIA

The evaluation will be conducted based on the following DAC criteria\(^ {18}\): relevance, coherence, efficiency, effectiveness, impact and sustainability, as well as human rights, gender equality and leaving no one behind, and disability inclusion (which will be mainstreamed within the evaluation questions) and lessons learned and best practices. Evaluation criteria and questions should be selected to meet the needs of the stakeholders and evaluation context. They will be further refined by the Evaluation Team in the drafting of the Inception Report.

<table>
<thead>
<tr>
<th>Relevance(^ {19}): Is the intervention doing the right thing?</th>
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</thead>
<tbody>
<tr>
<td>Relevance is the extent to which the activity is suited to the priorities and policies of the target group, recipient, and donor.</td>
</tr>
<tr>
<td>1. To what extent was the design(^ {20}) of the seven projects relevant to the fulfilment of the UNODC mandate, the regional and national strategies (outcome 8, 11 and 12 of the UNSDCF workplan) and the achievement of SDG targets 1.b, 4.7, 5c, 16.5, 16.6, 16.7, 16.10, 17.14 and 17.17?</td>
</tr>
<tr>
<td>2. To what extent was the design of the project: a) based on evidence b) clear, realistic, and commonly understood by the stakeholders, c) respond to the needs and priorities of the counterparts, d) relevant to the achievement of results, and e) in terms of its chain of indicators, adequate to measure the objective to which they are linked and the results of the project?</td>
</tr>
<tr>
<td>3. How has the portfolio of anti-corruption projects managed to address emerging issues or cover areas that have not been covered before?</td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>Coherence(^ {21}): How well does the intervention fit?</th>
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<tbody>
<tr>
<td>The compatibility of the intervention with other interventions in the country, sector, or institution</td>
</tr>
<tr>
<td>4. To what extent was there external coherence between project interventions and those of other UN agencies, private sector, CSOs, academia, donors, etc to achieve equivalent or similar objectives to those pursued by each project?</td>
</tr>
<tr>
<td>5. To what extent were UNODC’s anti-corruption projects in Mexico coordinated in a coherent manner within the anti-corruption program, between projects in the anti-corruption portfolio, and in relation to UNODC’s strategies in the framework of the country program?</td>
</tr>
<tr>
<td>6. To what extent is there external coherence with other national anti-corruption initiatives or similar interventions in other countries?</td>
</tr>
</tbody>
</table>

\(^{17}\) As per USAID guidelines for the follow-up to the implementation (performance and financial reports) and the monitoring the execution of activities and output achievement in the line with the Monitoring Evaluation and Learning Plan (MEL Plan).

\(^{18}\) [https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm](https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm)

\(^{19}\) Includes the previous criterion of design.

\(^{20}\) Design is understood as the objectives, theory of change and logical framework, hypotheses, risk analysis and the contextual elements considered.

\(^{21}\) Includes the previous criteria of partnerships and cooperation.
## Efficiency: How well are resources being used?
The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way.

7. To what extent were the resources allocated to the projects sufficient and delivered on time for the completion of activities, production of outputs and achievement of project objectives?

8. What measures were taken during project planning and implementation to ensure the efficient use of resources, including to address the circumstances arising from COVID-19?

## Effectiveness: Is the intervention achieving its objectives?
The extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.

9. To what extent have the outputs, outcomes and objectives of the projects been achieved or can be expected to be achieved?

10. What were the factors that facilitated or impeded the achievement of the objectives of the projects? Consider addressing the factors under the good practice approach and using the differentiation between "direct and indirect, primary and secondary" effects.

## Impact: What difference does the intervention make?
The extent to which the intervention has generated or is expected to generate significant positive or negative, intended, or unintended, higher-level effects.

11. To what extent has the technical assistance provided by the set of projects evaluated contributed to strengthening anti-corruption efforts, raising awareness of the problem, adopting regulations and standards that improve the situation of corruption in Mexico?

12. To what extent have the projects contributed to institutional strategies that include cross-cutting approaches and particular perspectives: results-based budgeting, gender equality and youth, and sustainable development mainstreaming and implementation of integrity politics and national or state anti-corruption strategies?

13. To what extent did the direct and indirect effects of the projects improve institutional behaviour to address the problem or situation that gave rise to the project?

14. If any innovation is identified in the management of the project or in the way products were produced, what challenge did the innovation respond to? What changed or improved in the situation, public policy and/or solution provided by the project compared to what was previously available?

## Sustainability: Will the benefits last?
The extent to which the net benefits of the intervention continue or are likely to continue.

15. How likely is it that the results and net benefits will be usefully exploited once the projects are completed?

16. To what extent have the projects generated national ownership and contributed to developing national capacity to support the sustainability of anti-corruption efforts?

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22 In the case of results and objectives, it is requested to argue considering values related to relative importance achieved/not achieved, achieved/expected, expected/not expected).

23 Please include differential results between groups.

24 The requests to answer the question seek on the one hand, to identify what is replicable and, on the other hand, to differentiate effectiveness from impact.
IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

**ANNEX I: TERMS OF REFERENCE**

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**Human rights, gender equality, youth and leaving no one behind: Has the intervention been inclusive and human rights based?**

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 and youth.

17. To what extent was a Human Rights perspective considered in the design and implementation of the projects evaluated?

18. To what extent was a gender equality perspective considered in the design and implementation of the projects evaluated?

19. To what extent were vulnerable populations considered in the design and implementation of the projects evaluated?

20. To what extent has UNODC’s anti-corruption work contributed to greater integration of gender and youth issues and integrity policies into anti-corruption strategies in Mexico?

**Lessons learned and best practices**

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

21. Which lessons and lessons learned, derived from the challenges of project implementation, are useful for the replication and/or scaling up of the projects evaluated and/or for future projects on anti-corruption?

22. What good practices emerge from the implementation of the projects, particularly those that would be useful to inform the replication and/or scaling up of UNODC’s work on anti-corruption in Mexico?

In the case of the MEXAD4 and GLOZ99 projects that are still in operation, it is desirable to use evaluation tools that account for the milestones affecting the outcome, the implementation of the intervention strategy of the project being evaluated.

To address the case study, the evaluation should consider the analysis of the quality of the data that feeding the indicators using the following criteria’s: validity, integrity, precision, relatability, and timeliness and providing recommendations to reverse the weaknesses and replicate their strengths to account for the project’s performance on indicators.

**IV. EVALUATION METHODOLOGY**

The methods used to collect and analyse data

This evaluation will use methodologies and techniques as determined by the specific needs for information, the questions set out in the TOR and further refined in the Inception Report, as well as the availability of stakeholders. In all cases, the evaluation team is expected to analyse all relevant information sources, such as reports, programme documents, thematic programmes, internal review reports, programme files, evaluation reports (if available), financial reports and any other additional documents that may provide further evidence for triangulation, on which their conclusions will be based. The evaluation team is also expected to use interviews, surveys 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

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For this analysis, a review of existing material is recommended at: Pnadw118.pdf (usaid.gov)
participatory approach, which seeks the views and assessments of all parties identified as the stakeholders of the project/programme. The Core Learning Partners (CLP).

The evaluation team will be asked to present a summarized methodology (including an evaluation matrix) 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, Norms and Standards.

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 a gender-sensitive, inclusive, respectful and participatory approach and methodology to capture disability and gender equality issues, as well as voices and opinions of both men, women and other marginalised groups, ensuring gender related and disaggregated data (e.g. age, sex, countries etc.). Special attention shall be paid to 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 discussed.

The recommendations –understood as actions proposed by the evaluation team to the program management– must be supported by evidence, so it would be desirable that the methodology describes the construction of the type of evidence required to provide recommendations consistent with the proposals sought by the evaluation. In relation to the treatment of innovations, it is suggested to include in the methodology the steps to be taken to systematize them.

The main elements of the evaluation process are the following:

- Preparation and submission of an Inception Report (containing a desk review summary, refined evaluation questions, data collection instruments, sampling strategy, limitations to the evaluation, and timetable) to IES through Unite Evaluations (https://evaluations.unodc.org) for review and clearance at least one week before any field mission/data collection phase may take place (may entail several rounds of comments);
- Initial meetings and interviews with the Project Manager and other UNODC staff as well as stakeholders during the field mission/data collection phase.
- Interviews (face-to-face or by telephone/skype/Teams etc.), with key project stakeholders and beneficiaries, both individually and (as appropriate) in small groups/focus groups, as well as using surveys/questionnaires or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation (respecting potential COVID-related restrictions on travel and in-person meetings).
- Analysis of all available information.
- Preparation of the draft evaluation report (based on the Template Report). The Evaluation Expert submits the draft report to IES only through Unite Evaluations for review and clearance (may entail several rounds of comments). A briefing on the draft report with project/programme management may also be organized. This will be based on discussion with IES and project/programme management.
- Preparation of the final evaluation report and an Evaluation Brief (2-pager) (based on the Template Brief) including full proofreading and editing, submission to IES through Unite Evaluations for review and clearance (may entail several rounds of comments). It further includes a PowerPoint presentation on final evaluation findings and recommendations.
- Presentation of final evaluation report with its findings and recommendations to the target audience, stakeholders etc. (in person or if necessary, through Skype/Teams etc.).
• In conducting the evaluation, the UNODC and the UNEG Evaluation Norms and Standards are to be considered.

• All tools, norms, and templates to be mandatorily used in the evaluation process can be found on the IES website: https://www.unodc.org/unodc/en/evaluation/guidelines-and-templates.html

V. TIMEFRAME AND DELIVERABLES

<table>
<thead>
<tr>
<th>Evaluation stage</th>
<th>Start date 26(dd/mm/yy)</th>
<th>End date (dd/mm/yy)</th>
<th>Subsumed tasks, roles</th>
<th>Guidance / Process description</th>
</tr>
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<tbody>
<tr>
<td>Inception Report (4-6 weeks)</td>
<td>15/08/22</td>
<td>23/09/22</td>
<td>Draft IR; Review by IES, PM; Final IR</td>
<td>Includes 2 weeks for review by IES</td>
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<tr>
<td>Data collection (incl. field missions) (5-7 weeks)</td>
<td>25/09/22</td>
<td>30/11/22</td>
<td>Field missions; observation; interviews; etc.</td>
<td>Coordination of data collection dates and logistics with PM.</td>
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<tr>
<td>Draft report and preliminary results presentation (8-10 weeks)</td>
<td>03/12/22</td>
<td>04/01/23</td>
<td>Drafting of report; by evaluators</td>
<td>Includes 2 weeks for review by IES, 1 week by PM</td>
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<tr>
<td></td>
<td>09/12/22</td>
<td>09/12/22</td>
<td>Preliminary results presentation (to be agreed with IES and PM)</td>
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<tr>
<td></td>
<td>07/01/23</td>
<td>23/12/22</td>
<td>Review by IES; review by PM; revision of draft</td>
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<tr>
<td>Draft report for CLP comments (2 weeks)</td>
<td>26/12/22</td>
<td>09/01/23</td>
<td>Compilation of comments by IES</td>
<td>Comments will be shared by IES with evaluators</td>
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<tr>
<td>Final report, Brief and PowerPoint slides (3-4 weeks)</td>
<td>10/01/23</td>
<td>24/01/23</td>
<td>Revision by eval; review/approval by IES; completion of MR and EFP by PM</td>
<td>Evaluation report, Brief and slides are finalised. Includes 1 week for review by IES and 1 week for PM</td>
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</table>

26 Required preparations before the start: completed ToR; 2 weeks 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.

27 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.
VI. EVALUATION TEAM COMPOSITION

<table>
<thead>
<tr>
<th>Role</th>
<th>Number of consultants</th>
<th>Specific expertise required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluation Expert (Team Leader)</td>
<td>1 (international consultant)</td>
<td>Evaluation methodology, gender equality and human rights</td>
</tr>
<tr>
<td>Substantive Expert</td>
<td>1 (international/national consultant)</td>
<td>Expertise in anti-corruption, accountability and/or transparency</td>
</tr>
<tr>
<td>Substantive Expert</td>
<td>1 (international/national consultant)</td>
<td>Expertise in anti-corruption, accountability and/or transparency</td>
</tr>
<tr>
<td>Research Assistant</td>
<td>1 (national consultant)</td>
<td>Expertise in data collection and analysis</td>
</tr>
</tbody>
</table>

The evaluation team will not act as representatives of any party and must remain independent and impartial. 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.

Absence of Conflict of Interest

According to UNODC rules, the evaluation team 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.

VII. MANAGEMENT OF THE EVALUATION PROCESS

Roles and responsibilities of the Project/Programme Manager

The Project/Programme Manager is responsible for:

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28 Please note that an evaluation team needs to consist of at least 2 independent evaluators – at least one Evaluation Expert and one Substantive Expert

29 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.
• drafting and finalizing the ToR;
• identifying stakeholders and selecting Core Learning Partners (representing a balance of men, women and other marginalised groups) and informing them of their role;
• recruiting the evaluation team following clearance by IES, ensuring issued contracts ahead of the start of the evaluation process in line with the cleared ToR. In case of any delay, IES and the evaluation team are to be immediately notified;
• compiling and providing desk review materials (including data and information on men, women and other marginalised groups) to the evaluation;
• reviewing the draft report and draft Evaluation Brief for factual errors;
• completing the Management Response (MR) and the Evaluation Follow-up Plan (EFP) for usage of the evaluation results;
• facilitating the presentation of final evaluation results;
• disseminating the final evaluation report and Evaluation Brief and communicating evaluation results to relevant stakeholders;
• recording of the status of the implementation of the evaluation recommendations in Unite Evaluations (to be updated once per year).

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

• All logistical arrangements for the travel/data collection phase including travel details; DSA-payments; transportation; etc.).
• All logistical arrangement for the meetings/interviews/focus groups/etc. (respecting potential COVID-related restrictions on travel and in-person meetings), ensuring interview partners adequately represent men, women and other marginalised groups and arrangements for the presentation of the evaluation results.
• Ensure timely payment of all fees/DSA/etc. (payments for the evaluation team must be released within 5 working days after the respective deliverable is cleared by IES).

Roles and responsibilities of the Independent Evaluation Section

The Independent Evaluation Section (IES) provides mandatory normative tools, guidelines, and templates to be used in the evaluation process. Furthermore, IES provides guidance, quality assurance and evaluation expertise, as well as interacts with the project manager and the evaluation team throughout the evaluation process. IES may change the evaluation process, timeline, approach, etc. as necessary at any point throughout the evaluation process.

IES reviews, comments on and clears all steps and deliverables during the evaluation process: Terms of Reference; Selection of the evaluation team, Inception Report; Draft Evaluation Report; Final Evaluation Report, Evaluation Brief and PowerPoint slides on the final evaluation results; Evaluation Follow-up Plan. IES further publishes the final evaluation report and the Evaluation Brief on the UNODC website, as well as sends the final evaluation report to an external evaluation quality assurance provider.

VIII. PAYMENT MODALITIES

The evaluation team will be issued consultancy contracts and paid in accordance with UNODC rules and regulations. The payment will be made by deliverable and only once cleared by IES. Moreover, 75 percent of

the daily subsistence allowance and terminals is paid in advance before travelling. The balance is paid after the travel has taken place, upon presentation of boarding passes and the completed travel claim forms. Deliverables which do not meet UNODC and UNEG evaluation norms and standards will not be cleared by IES. IES is the sole entity to request payments to be released in relation to evaluation. Project/Programme Management must fulfill any such request within 5 working days to ensure the independence of this evaluation process. Non-compliance by Project/Programme Management may result in the decision to discontinue the evaluation by IES.
The Independent Evaluation Section of United Nations Office on Drugs and Crime (UNODC) is in the process of undertaking an independent, in-depth cluster Evaluation of UNODC’s anti-corruption portfolio in Mexico (2016-2022). The evaluation is undertaken in line with UNODC and UNEG norms and standards for evaluation.

The purpose of the evaluation is to ensure accountability towards all stakeholders, to inform the design and implementation of future related projects, and to increase organizational learning within UNODC and in partnership with all stakeholders.

The evaluation is being carried out by a team of four external independent evaluators, consisting of a Team Leader (Ms. Camille Massey), two Substantive Experts (Dr. Ernesto Velasco, Mr Benjamin Santa Maria), and one National Evaluator (Mr Renato Busquets).

The purpose of this interview is to gather your personal thoughts and experience about the anti-corruption projects of UNODC in Mexico, to the best of your knowledge or recollection. We thank you in advance for your openness and your help.

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 (AND PROJECT EXPERTS):

1. In your view, what have been the intentions, and the “story” of UNODC’s involvement in anti-corruption in Mexico? How has this design evolved over time, if it did?

2. How did the changes in context affect the implementation and results of UNODC in this area? [let the respondent speak, then prompt the following topics if not tackled: political/electoral, economic, and social context, context of the anti-corruption events in Mexico, COVID-19 pandemic.]

3. As you see it, what were the under-served needs in Mexico’s anti-corruption architecture when the(se) project(s) was/were designed? [Prompt if not tackled: under-supported institutions, gaps in Government’s efforts and/or donors’ support] Which, if any, did the intervention tackle?

4. How compatible was this approach with the Government’s strategy?

5. How did this effort fit in the Country Office’s overall strategy? With the articles of the Convention?

6. How did UNODC select its partners? How would you describe the partnership with the Government? With the private sector? With the donors? With civil society actors?

7. What changes has UNODC contributed to in Mexico’s fight against corruption? [Prompt if not tackled: Changes to the legal, regulatory and policy framework; Effective functioning and
delivery of relevant institutions (public, private or civil society) which combat or prevent corruption. Interactions among the various anti-corruption actors (among public services, at various governance levels, between public/private/civil society actors); Awareness about corruption evolve since 2016, and did UNODC contribute to that in any way?]

8. Looking towards the future, what are the major challenges or gaps that could endanger these changes? Where could UNODC’s support be most useful?

9. What are you most proud of in this portfolio?

10. If you could change something, to what was done and how, what would it be? What still bothers you, if anything? [Prompt if not tackled: human/financial/material/time resources, choice of partners, priorities, project management practices]

INTERVIEW QUESTIONS FOR GOVERNMENT REPRESENTATIVES (RECIPIENTS) AND CSOS:

1. Which anti-corruption projects of UNODC in Mexico have you participated in since 2016 (to the best of your recollection)? In what role?

2. Were UNODC priorities and targets relevant to make significant changes in the key aspects of anti-corruption? [If needed, clarify: UNODC has chosen anti-money laundering, policy framework, guidelines/tools/processes at the local level in various services delivered to citizens (e.g., health, etc.) Was this the right choice and why?]

3. In your view, what have been the key contribution of UNODC for anti-corruption in Mexico?

4. How did the context change and affect UNODC’s intervention over time? [let the respondent speak, then prompt the following topics if not tackled: political/electoral, economic and social context, context of the anti-corruption events in Mexico, COVID-19 pandemic.]

5. What changes has UNODC contributed to in Mexico’s fight against corruption?

[Prompt if not tackled: Changes to the legal, regulatory and policy framework; Effective functioning and delivery of relevant institutions (public, private or civil society) which combat or prevent corruption; Interactions among the various anti-corruption actors (among public services, at various governance levels, between public/private/civil society actors); Awareness about corruption evolve since 2016, and did UNODC contribute to that in any way?]

6. Looking towards the future, what are the major challenges or gaps that could endanger these changes. Where could UNODC’s support be most useful?

7. Overall, how would you describe UNODC as a partner and actor? Is there anything special/different about them? [Prompt if not tackled: the Convention, the fact Mexico is a Member State and a party to the Convention, the mobilization of experts from various countries...]
INTERVIEW QUESTIONS FOR DONORS:

1. How would you characterize the partnership with UNODC concerning anti-corruption strategies? When did it start, and in which circumstances?

2. From your perspective as a donor concerning corruption, what are the most critical issues or problems you have identified as priorities for action?

3. How does UNODC collaboration fit with those priorities and your institutional strategy?

4. What are the most significant changes concerning corruption that can be reasonably attributed to the project, and what factor affected them?

5. Were there activities that were not implemented, and why?

6. Which are the most critical risks that may jeopardize project achievements? [prompt if not tackled: Are project components at risk of being abandoned by counterparts/beneficiaries?]

7. Which aspects of your collaboration with UNODC are satisfactory? Which ones are less satisfactory and how can they be improved?
### UNODC EVALUATION DOCUMENTS

<table>
<thead>
<tr>
<th>Document name</th>
<th>Number reviewed</th>
<th>Project code(s)</th>
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<tr>
<td>UNODC Independent Evaluation Section: Meta-Analysis 2011-2014</td>
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<td>UNODC Independent Evaluation Section: Meta-Analysis 2015-2016</td>
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<td>UNODC Independent Evaluation Section: Meta-Analysis 2017-2018</td>
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<td>UNODC Independent Evaluation Section: Evaluation-based analysis of good practices in UNODC’s approach to capacity building</td>
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<td>Gender-Responsive Evaluations in the Work of UNODC (2018)</td>
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<td>UNODC Gender Guidance for Project Managers and Evaluators</td>
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<td>UNODC evaluation guidelines, templates, handbook, policy</td>
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<td>Evaluation Inception Report Template</td>
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<td>Evaluation Brief Template IDE, IPE</td>
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<td>Evaluation Quality Assessment Template</td>
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<tr>
<td>UNEG: Integrating human rights and gender equality in evaluations</td>
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<td>UNEG Norms and Standards for Evaluation (2016)</td>
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<tr>
<td>UNODC Independent Evaluation Section: Meta-Analysis 2011-2014</td>
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**Total number of internal documents reviewed: 13**

### UNODC DOCUMENTS

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<td>Budget Plan</td>
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<td>Financial Report 2021</td>
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<tr>
<td>Public International Organization (PIO) Cooperative Agreement</td>
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<td>Project Document</td>
<td>1</td>
<td>MEXAB5</td>
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<tr>
<td>Progress Report (APPR) 2020</td>
<td>1</td>
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<td>Project Gender Mainstreaming Checklist</td>
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<tr>
<td>Financial Report 2021</td>
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<tr>
<td>Progress Reports (APPR and SAPPR) 2017-2020</td>
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<tr>
<td>Automatization: A tool to prevent corruption in the Mexican customs agency, 2018</td>
<td>1</td>
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<tr>
<td>Glossary of Terms for Corporate Integrity, 2018</td>
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<tr>
<td>Self-Assessment Tool for Corruption Risk Management, 2018</td>
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<tr>
<td>Implementation Guidebook for the Code of Conduct for Small and Medium-sized Enterprises (SMEs), 2018</td>
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<td>Report on Good Practices to Prevent and Combat Corruption and Corporate Integrity for Small and Medium-sized Enterprises (SMEs) in Mexico 2017-2018</td>
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<td>Model of a Code of Conduct for Small and Medium-sized Enterprises (SMEs), 2018</td>
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<td>Risk Analysis Protocol, 2018</td>
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<tr>
<td>Document with methodology for the “Citizenship Building in Infant Population for the Prevention of Corruption in Zacatecas” project</td>
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<tr>
<td>Manual for teachers and volunteers for the “Citizenship Building in Infant Population for the Prevention of Corruption in Zacatecas” project</td>
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<tr>
<td>International Good Practices to Fight International Bribery, 2018</td>
<td>1</td>
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</table>
### Implementation Manual for the National Peer Review Mechanism in Mexico. Based on the Model of the Review Mechanism on the implementation of the UNCAC, 2019
- MEXW26

### International Best Practices on measuring, monitoring, and evaluating corruption.
- MEXW26

### Proposal for Joint Programme “Improving the allocation of risks and resources for sustainable development”.
- MEXAD4

### Project Document for “Improving the allocation of risks and resources for sustainable development”.
- MEXAD4

### Joint Programme Quarterly Checks, 2020 Quarter 3 – 2021 Quarter 4
- MEXAD4

### Field Mission Reports
- MEXAD4

### Financial Report 2021
- MEXAD4

### Diagnostic on the legal framework, institutional capacities, and organizational structures for asset recovery investigations at the state-level, 2021.
- MEXAD4

### Legislative Mapping: Asset recovery legislation at the federal and state level, 2021.
- MEXAD4

### Minute of December 8, 2021, meeting with the Directive Coordination Committee and Advisory Group of the project.
- MEXAD4

### Proposal
- MEXW41

### Financial Report 2021
- MEXW41

### Grant Agreement
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### Contract Addenda
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### Project Document
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### Project Revision 2019
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### Progress Reports (APPR and SAPPR) 2018-2020
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### Diagnostic of the institutional capacities to implement a Results-Based Budgeting and a Performance Evaluation System.
- MEXW41

### Multiannual Training Agenda to strengthen the institutional culture on Results-Based Management.
- MEXW41

### Capacity-Building Model to strengthen the institutional culture on Results-Based Management.
- MEXW41

### Methodology for the strategic selection of public programs to be evaluated, including those with federal funding.
- MEXW41

### Multiannual evaluation agenda.
- MEXW41

### Terms of Reference for Performance Evaluation of different programs
- MEXW41

### Report on Revisions of the Terms of Reference for the Annual Evaluation Program of Nuevo León
- MEXW41

### Evaluation Reports of public programs in Fiscal Year 2017
- MEXW41

### Evaluation Reports of public programs in Fiscal Year 2018
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### Complementary Evaluation Reports of public programs in Fiscal Year 2018
- MEXW41

### Analysis of the programmatic structure of the state government of Nuevo León
- MEXW41

### Iteration Reports of the Performance Evaluation Integral System digital platform
- MEXW41

### Documentation analysis of the Performance Evaluation Integral System digital platform
- MEXW41

### Development Strategy for the modules of the Performance Evaluation Integral System
- MEXW41

### Maintenance and Support Report of the Performance Evaluation Integral System
- MEXW41

### Database Diagram for the Performance Evaluation Integral System
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### Developer Manual for the Performance Evaluation Integral System
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### Technical Memory of the Performance Evaluation Integral System
- MEXW41
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<tr>
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<tr>
<td>Methodology to adopt a Results-Based Budgeting and a Performance Evaluation System in the state government of Nuevo León</td>
<td>1</td>
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<td>Complementary Guide to the Methodology to adopt a to adopt a Results-Based Budgeting and a Performance Evaluation System in the government of Nuevo León</td>
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<td>Report on the UNCAC meeting of the Open-ended Intergovernmental Working Group on the Prevention of Corruption held in Vienna from 31 August to 2 September 2015</td>
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<td>Methodology for Performance Indicators on gender Perspective</td>
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<td>Criteria to update and create budgetary programs, modification of goals, and follow up of Performance Indicators</td>
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<td>Guidelines for the construction and design of Performance Indicators with the Logic Framework Methodology</td>
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<td>Concept Note for the “Global Integrity Education” project</td>
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<td>Project Document</td>
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<td>Letter of Agreement regarding funding for the “Global Integrity Education” project</td>
<td>1</td>
<td>GLOZ99</td>
</tr>
<tr>
<td>Annual and Interim Progress Reports 2020-2022</td>
<td>5</td>
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</tr>
<tr>
<td>University Training Modules on Integrity, Ethics, and Anti-Corruption adapted to the local context of Mexico</td>
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<td>Final Financial Report</td>
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<td>Work Plans UNODC Liaison and Partnership Office in Mexico (LPOMEX) 2020-2022</td>
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<td>UNODC Strategic Vision for Latin America and the Caribbean 2022-2025</td>
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<td>UNCAC National Anti-Corruption Strategies. A Practical Guide for Development and Implementation 2015</td>
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<td>Mechanism for the Review of Implementation of the United Nations Convention against Corruption — Basic Documents</td>
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<td>Multilateral Organisation Performance Assessment Network (2019) Assessments</td>
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<td>Report of the Office of Internal Oversight Services, 16 March 2021, Evaluation of the United Nations Office on Drugs and Crime</td>
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<td>Resolution 8/10 Conference of the States Parties to the UNCAC, Measurement of corruption.</td>
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</table>
### Total number of internal documents reviewed: 158

#### EXTERNAL DOCUMENTS

<table>
<thead>
<tr>
<th>Document name</th>
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<tbody>
<tr>
<td>UNSDCF country/region</td>
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<td>General Guidelines of the state government of Nuevo León to implement a</td>
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<tr>
<td>Results-Based Budgeting and a Performance Evaluation System, published</td>
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<td>Progress report for states and territorial demarcations on the implementation</td>
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<tr>
<td>and operation of Results-Based Budgeting and a Performance Evaluation System,</td>
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<tr>
<td>2021</td>
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<tr>
<td>siglo-xxi/</td>
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<td>Landscape Assessment, 2021</td>
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</tr>
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<tr>
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<td>UN Convention against Corruption (UNCAC)</td>
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<td>UN Framework for Sustainable Development in Mexico 2020-2025</td>
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<td>National Anti-Corruption Policy for Mexico, 2018</td>
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<td>Implementation Program of the National Anti-Corruption Policy for Mexico,</td>
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**ANNEX III: DESK REVIEW LIST**
<table>
<thead>
<tr>
<th>IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Executive Secretariat of the National Anti-Corruption System, &quot;Design Guide for State Anti-Corruption Policies in Mexico&quot;, 2020</strong></td>
</tr>
<tr>
<td><strong>Executive Secretariat of the National Anti-Corruption System, &quot;Report on the formation of the operational structure and legislative harmonization of the Local Anti-Corruption Systems&quot;, 2021</strong></td>
</tr>
<tr>
<td><strong>National Development Plan of Mexico 2019-2024</strong></td>
</tr>
<tr>
<td><strong>Program for a close and modern government 2013-18, National Development Plan of Mexico 2013-2018</strong></td>
</tr>
<tr>
<td><strong>Administrative Responsibilities Law for Public Servants (National Mexican Law)</strong></td>
</tr>
<tr>
<td><strong>Criminal Code (National Mexican Law)</strong></td>
</tr>
<tr>
<td><strong>Law of Federal Oversight and Accountability (National Mexican Law)</strong></td>
</tr>
<tr>
<td><strong>Law of the Attorney General of the Republic (National Mexican Law)</strong></td>
</tr>
<tr>
<td><strong>Law of the Federal Court of Administrative Justice (National Mexican Law)</strong></td>
</tr>
<tr>
<td><strong>Law of the Federal Public Administration (National Mexican Law)</strong></td>
</tr>
<tr>
<td><strong>National Anti-Corruption System General Law (National Mexican Law)</strong></td>
</tr>
<tr>
<td><a href="https://auditoriadeseguridad-cdeunodc.org/encuesta/usuarios-que-experimentaron-algun-acto-de-corrupcion-inegi-encig/">https://auditoriadeseguridad-cdeunodc.org/encuesta/usuarios-que-experimentaron-algun-acto-de-corrupcion-inegi-encig/</a></td>
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<tr>
<td><a href="https://www.fatf-gafi.org/en/topics/mutual-evaluations.html">https://www.fatf-gafi.org/en/topics/mutual-evaluations.html</a></td>
</tr>
<tr>
<td><a href="https://www.oas.org/en/sla/dlc/mesicic/">https://www.oas.org/en/sla/dlc/mesicic/</a></td>
</tr>
<tr>
<td><a href="https://www.transparency.org/en/countries/mexico">https://www.transparency.org/en/countries/mexico</a></td>
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</tbody>
</table>
IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

| Title                                                                 | Authors/Institutions                                                                 | Year/Publication Details | Relationship
|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------|--------------------------
| Overview of corruption and anti-corruption efforts in Mexico          | Albisu Ardigo, Inaki, U4 Anti-corruption Resource Centre, Norway                      | 2019                     | All projects in cluster  
| Can Corruption Be Studied in the Lab? Comparing a Field and a Lab Experiment | Armantier, Olivier and Boly, CIRANO Working Papers 2008s-26, Amadou                   | 2008                     | All projects in cluster  
| Does corruption information inspire the fight or quash the hope? A field experiment in Mexico on voter turnout, choice, and party identification | Chong, Alberto et al. The Journal of Politics, 77(1), pp. 55–71, 2015 | 2015                     | All projects in cluster  
| Mexico’s National Anti-Corruption System: Reaching the Finish Line?  | Fonseca, Roberto, https://repository.law.miami.edu/umialr/vol50/iss2/4/ | 2020                     | All projects in cluster  
| Syndromes of corruption: wealth, power, and democracy                  | Johnston, Michael, Cambridge University Press, 2005                                  | 2005                     | All projects in cluster  
| Memories of the evaluation week, 2019, 2020, and 2021                  | Memories of the International Conference Evaluation 2021                             | 2021                     | All projects in cluster  

Total number of external documents reviewed: 47

ANNEX III: DESK REVIEW LIST
ANNEX IV: STAKEHOLDERS CONTACTED DURING THE EVALUATION

STAKEHOLDERS PARTICIPATING IN INTERVIEWS OR FOCUS GROUP DISCUSSIONS:

<table>
<thead>
<tr>
<th>Type of stakeholder (see note below)</th>
<th>Number of stakeholders</th>
<th>Sex disaggregated data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government recipient</td>
<td>27</td>
<td>Male: 16 Female: 11</td>
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<tr>
<td>Donors</td>
<td>8</td>
<td>Male: 6 Female: 2</td>
</tr>
<tr>
<td>Project Implementer</td>
<td>9</td>
<td>Male: 4 Female: 5</td>
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<tr>
<td>Academia/Research Institute</td>
<td>10</td>
<td>Male: 1 Female: 9</td>
</tr>
<tr>
<td>Private Sector (implementing partners)</td>
<td>6</td>
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<tr>
<td>Other United Nations Agency</td>
<td>2</td>
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<tr>
<td></td>
<td>Total: 62</td>
<td>Total male: 29 Female: 33</td>
</tr>
</tbody>
</table>

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

STAKEHOLDERS PARTICIPATING IN SURVEYS OR OTHER FORMS OF WRITTEN FEEDBACK:

<table>
<thead>
<tr>
<th>Type of stakeholder</th>
<th>Number of responses</th>
<th>Sex disaggregated data</th>
</tr>
</thead>
<tbody>
<tr>
<td>National-level executive</td>
<td>12</td>
<td>Male: 7 Female: 5 N/R: 0</td>
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<tr>
<td>State-level or municipal executive</td>
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<tr>
<td>Educational institution</td>
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<tr>
<td>Judiciary</td>
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<td>Private sector</td>
<td>14</td>
<td>Male: 9 Female: 5 N/R: 0</td>
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## ANNEX IV: Stakeholders Contacted During the Evaluation

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<thead>
<tr>
<th>Category</th>
<th>Count</th>
<th>Male</th>
<th>Female</th>
<th>N/R</th>
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<td>CSO</td>
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<td>4</td>
<td>5</td>
<td>0</td>
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<tr>
<td>Other</td>
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<td>24</td>
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<tr>
<td>Total</td>
<td></td>
<td>99</td>
<td>123</td>
<td>4</td>
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<tr>
<td>Grand total</td>
<td></td>
<td>226</td>
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</table>
PROJECT SUMMARY GLOZ99

<table>
<thead>
<tr>
<th>Project name</th>
<th>UNODC Global Integrity Education</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project number</td>
<td>GLOZ99</td>
</tr>
<tr>
<td>Start date (planned</td>
<td>October 2019</td>
</tr>
<tr>
<td>and real)</td>
<td></td>
</tr>
<tr>
<td>End date (planned</td>
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</tr>
<tr>
<td>and real)</td>
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<tr>
<td>Planned Budget</td>
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<td>Donor(s)</td>
<td>Siemens</td>
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<tr>
<td>Spent budget (latest</td>
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<td>info)</td>
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<tr>
<td>Location(s)</td>
<td>Global with focus on Pakistan, Kenya, and Mexico</td>
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PROJECT DESCRIPTION

Project aim
This Global Integrity Education Project is a segment of the Global Programme to prevent and combat corruption through effective implementation of the United Nations Convention against Corruption, its purpose is to bring together business and academia to: (i) develop and implement an innovative integrity education programme in companies and universities; and (ii) equip young graduates with ethical mindsets and strategies at the start of their careers in the private sector, and empower them to become a driving force for ethical business and foster ethical decision-making in the private sector. The project is being implemented in Mexico, as well as in Kenya and Pakistan, and is funded by the Siemens Integrity Initiative.

Key expected outputs
Development of 8 university modules on Integrity, Ethics and Anti-Corruption that are contextualized and adapted to the anti-corruption local context of Mexico.

University lecturers trained on the 8 modules so that they can train university students.

Guest lectures being conducted by business practitioners

Students trained on 8 modules.

Conversion of the modules to on-the-jobs ethics courses by the students for the businesses that collaborate in this project.

Key components
Development of training material (modules) with the help of working groups comprised of universities and businesses.

Training activities for university lecturers. Training activities by trained lecturers and business practitioners to university students.

Development of business ethics courses by the university students from the 8 modules.
To mitigate risks to successful project implementation caused by the Covid-19 pandemic and ensuing restrictions on in-person meetings and travel, the training of trainers for lecturers on contextualized modules was converted to a virtual format.

**PROJECT KEY RESULTS**

A launch event for this project in Mexico was done in the framework of the International Anti-Corruption Day in 2019.

8 modules were successfully adapted and contextualized to Mexico.

Interactive training of trainer courses was conducted for university lecturers, in Mexico over 150 lecturers were trained on these modules.

4 Business practitioners delivered guest lectures in Mexico.

More than 2,150 students were trained by the lecturers.
6 private sector businesses (health and energy sector) have committed to host an on-the-job training in Mexico.

Of the students who were trained and responded a satisfaction survey, 65% mentioned that is highly likely they will use the knowledge from these integrity modules.

**MAIN CHALLENGES**

The main challenge was related the change of some of the training activities to a hybrid approach, using some e-learning a virtual tools, while also using in-person activities.

**COOPERATION/SYNERGIES**

- Synergy with universities (Anáhuac University; Instituto Tecnológico Autónomo de México; Instituto Politécnico Nacional; Instituto Tecnológico de Estudios Superiores de Monterrey; Universidad Panamericana) and businesses (Siemens Energy México, Bayer de México, Novartis México, Pfizer México, BK Energy, Servier, Covestro México, BNR, Janssen México) to be part of the working groups to adapt the modules. Lecturers are from these universities and some of these businesses have committed to host on-the-job trainings derived from the content of these modules.

Coherence with National policies, strategies, and action plans

This project contributes to the Strategic vision for Latin America and the Caribbean, UNODC. Work line 3, priority area I.
PROJECT SUMMARY MEXAB5

<table>
<thead>
<tr>
<th>Project name</th>
<th>Strategy for Strengthening Corruption Prevention Capacities in Mexico</th>
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<tr>
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<td>October 1st, 2019</td>
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The spending indicated above is by the end of data collection and analysis phase in January 2023. In April 2023, the project staff reported a spending of $1,022,488.66.

PROJECT DESCRIPTION

Project aim

The purpose of this project is to support the efforts of the Mexican government to increase transparency, accountability, and citizen participation through a series of pilot initiatives with scalable results, in order to prevent corruption.

The project is structured in four components:

- Component 1: Prevention and management of conflicts of interests in the public administration, specifically in subnational government agencies that are most vulnerable to Conflicts of Interest, the intention is that these agencies will build their capacities to identify, document, and manage these conflicts. The intended institution are the state Comptrollerships and the anti-corruption units (in Spanish, Órganos Internos de Control, OICs) of the subnational government agencies.

- Component 2: Empowering Citizens in the Fight Against Corruption and Impunity: Improve upon existing tools for citizen participation to strengthen access to information and foster the use of open data, research, and citizen reporting of corruption.

- Component 3: Strengthening Integrity in Public Procurement Processes in the private sector by the development of internal ethics and integrity practices and increased when dealing with procurement processes with the Mexican government. A Monitoring and Evaluation Framework will be developed to help companies to monitor the implementation and evaluate the impact of their integrity programs to prevent and detect corruption within the organization.

- Component 4: Peer Review Mechanism for Local Anti-Corruption Systems. This component is based on the UNCAC model of peer review of national implementation of anti-corruption efforts and legal frameworks, instead of doing it between countries, this will be done among Mexican states.

Key expected outputs

Component 1: 1) Operational Environment Reports (in Spanish, Reportes de Entorno Operativo). This report includes: a diagnostic of the risks associated with Conflicts of Interest, mainly those in public procurement; identification of the areas or scenarios more susceptible to Conflicts of Interest; the design and
implementation of training sessions to prevent Conflicts of Interest in public procurement. 2) Also, a 15-hour training for public servants of the Ethics Committees of some government institutions, the subject matter for this activity is Public Ethics and Prevention of Conflict of Interests in the Public Sector.

Component 2: The creation of training modules along with material for workshops on “Fighting corruption” and “Integrity and Ethics”. Training activities for students and teachers so that they can participate in activities of review of government activities. Training activities for members of Civil Society Organizations so that they can participate in activities of review of government activities. Link the trained persons with state Comptroller’s office to perform some of these government review activities.

Component 3: Development of the Monitoring and Evaluation Framework.

Component 4: Implementation of the Peer Review Mechanism for Local Anti-Corruption Systems for 31 states, which will produce 31 final reports with technical recommendations.

**Intervention technique(s)**

Component 1: Diagnostic and training activities.

Component 2: Development of training modules and material, conducting training activities.

Component 3: Publication of the Monitoring and Evaluation Framework.

Component 4: Technical Assistance for the the Peer Review Mechanism for Local Anti-Corruption Systems.

**National Partners**

<table>
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<tr>
<th>Name of institution</th>
<th>Type of institution (public body, CSO, academia, private, international org)</th>
<th>Level of institution (federal, state, local governance body)</th>
<th>Institution’s mandate or sector of activity</th>
<th>Institution’s role in the project</th>
<th>Main units involved in project within the institution</th>
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<tbody>
<tr>
<td>Ministry for Public Administration (in Spanish, Secretaría de la Función Pública, SFP)</td>
<td>Public body</td>
<td>Federal</td>
<td>Public sector governance</td>
<td>Originally, main counterpart of the project</td>
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<td>Civil Society</td>
<td>National</td>
<td>Head of the National Anticorruption System</td>
<td>Revisor of the Citizen Participation Methodology for the prevention and fight against corruption and Observer of the National Peer to Peer Review Mechanism</td>
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<tr>
<td>National Institute for Transparency, Access to Information and</td>
<td>Public body</td>
<td>National</td>
<td>Public sector governance</td>
<td>Observer of the National Peer to Peer</td>
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<td>Autonomous institute</td>
<td>Review Mechanism</td>
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<td>Federal</td>
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<td>Public sector governance</td>
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<td>State</td>
<td>Anti-corruption</td>
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<td>Local anti-corruption systems including the anti-corruption units of various subnational government agencies.</td>
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<td>State</td>
<td>Anti-corruption</td>
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<td>Academia</td>
<td>Beneficiaries of training activities (teachers and students)</td>
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<tr>
<td>Civil Society Organizations</td>
<td>CSO</td>
<td>Beneficiaries of training activities</td>
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</table>
PROJECT KEY RESULTS

The achievements of component 1 were the elaboration of the Operational Environment Reports for the states of Coahuila, Guanajuato, and Quintana Roo. Also, training activities were conducted in Quintana Roo.

For component 2: Training activities were conducted in Coahuila, Guanajuato, and Quintana Roo.

For Component 3: the Monitoring and Evaluation Framework was developed.

For Component 4: Peer Review Mechanism for Local Anti-Corruption Systems was started.

MAIN CHALLENGES

While originally this project was conceived with the Ministry for Public Administration (in Spanish, Secretaría de la Función Pública, SFP), as the main counterpart in 2020 this Ministry decided to leave the project. Originally, this Ministry would be the liaison with many of the government agencies. Consequently, UNODC had to liaise with these agencies in a more direct manner. Following the withdrawal of the SFP, several agencies under the National Anticorruption System, such as the Citizen Participation Committee and the National Institute for Access to Information, stepped in to participate in the project, along with State-level institutions.

Also, the Covid-19 pandemic affected the project since some activities were planned to be in-person.

COOPERATION/SYNERGIES

The main synergy was with the local anti-corruption systems.

COHERENCE WITH NATIONAL POLICIES, STRATEGIES AND ACTION PLANS

Thematic axes, objectives, and lines 1 to 4 of the PNA Implementation Program (PI-PNA).

Strategic objectives 1, 2 and 5 of the Public Sector Program 2020-2024

PROJECT SUMMARY MEXAD4

<table>
<thead>
<tr>
<th>Project name</th>
<th>Risk and Resource Allocation for Sustainable Development</th>
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<tr>
<td>Project number</td>
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<tr>
<td>Start date (planned and real)</td>
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<tr>
<td>End date (planned and real)</td>
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<tr>
<td>Planned Budget</td>
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<td>Donor(s)</td>
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<td>Spent budget (by the end of data collection and analysis phase in January 2023)</td>
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<tr>
<td></td>
<td>Note: in April 2023, the project staff reported a spending of $369,435.21</td>
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<tr>
<td>Location(s)</td>
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</tr>
</tbody>
</table>

PROJECT DESCRIPTION

Project aim
The purpose of this project is to strengthen the governance of the Mexican financial system for sustainable development, by improving the processes by which prosecutors engage in financial investigations aimed at recovering stolen assets.

Key expected outputs
Diagnostic on the legal framework, institutional capacities, and organizational structures for asset recovery investigations at the state-level.

Development of a legal toolkit on asset recovery that has case selection guidelines, an investigation protocol, a judicial presentation manual and key recommendations for organizational laws of state prosecution offices.

Capacity-building activities in asset-recovery. This output is mainly about training public servants on this subject matter.

Creation of knowledge exchange mechanisms on asset recovery.

Key components
Diagnostic. Technical documents, that include guidelines, for a legal toolkit.

Training activities with public servants, mostly public servants from the anti-corruption units of the state prosecution offices.

Working group sessions. Forums for advocacy and knowledge exchange activities

National partners

<table>
<thead>
<tr>
<th>Name of institution</th>
<th>Type of institution (public body, CSO, academia, private, international org)</th>
<th>Level of institution (federal, state, local governance body)</th>
<th>Institution’s mandate or sector of activity</th>
<th>Institution’s role in the project</th>
<th>Main units involved in project within the institution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organization</td>
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<td>Level</td>
<td>Function</td>
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<tr>
<td>United Nations Environment Programme (UNEP)</td>
<td>International</td>
<td></td>
<td>Implementation partner</td>
<td>it has international experts on the technical working group</td>
<td></td>
</tr>
<tr>
<td>United Nations Development Programme in Mexico (UNDP Mexico)</td>
<td>International</td>
<td></td>
<td>Implementation partner</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ministry of Finance (in Spanish Secretaría de Hacienda y Crédito Público, SHCP)</td>
<td>Public body</td>
<td>Federal</td>
<td>Finance / Treasury</td>
<td>Counterpart, also participates in technical working group</td>
<td></td>
</tr>
<tr>
<td>Banco de México, the Mexican Central Bank</td>
<td>Public body</td>
<td>Federal</td>
<td>Finance</td>
<td>Participates in technical working group</td>
<td></td>
</tr>
<tr>
<td>UNAM</td>
<td>Academia</td>
<td></td>
<td></td>
<td>Participates in technical working group for information only</td>
<td>Institute of Atmospheric Sciences</td>
</tr>
<tr>
<td>State prosecution offices</td>
<td>Public body</td>
<td>State</td>
<td>Justice</td>
<td>Counterpart</td>
<td>Anti-corruption prosecutors</td>
</tr>
</tbody>
</table>

This main adjustment in the design of the project was a shift from a federal/national approach towards a subnational level when working with prosecutors. This led to changes in the budget distribution and the workplan. This was caused by the withdrawal of the project National Prosecution Office (in Spanish, Fiscalía General de la República FGR) from the project. The original plan was to have an in-depth analysis of Mexico’s adoption of the asset recovery principles set forth by the United Nations Convention Against Corruption (UNCAC), based on the findings of its Implementation Review Mechanism. While this has been conducted, it was decided that it was necessary to go beyond this scope and focus more heavily on the subnational capacities and institutional
frameworks. Legal analysis on asset recovery and reintegration incorporated the legal framework of 6 states (Campeche, Chihuahua, Durango, Oaxaca, Quintana Roo, and Yucatán).

PROJECT KEY RESULTS
By the end of the evaluation’s data collection phase, the project conducted a mapping exercise of financing for the Sustainable Development Goals.

In the context of the project, a technical working group was established with the purpose of strengthening analysis and policy tools for addressing climate change risks in the financial system. This working group has the participation of with the participation of international experts from UNEP Finance Initiative, officials from Mexican financial regulators and climate change experts from the Institute of Atmospheric Sciences of the UNAM. The financial regulation institutions represented in this group are the Mexican Central Bank (Banco de México), the Ministry of Treasury of (in Spanish Secretaría de Hacienda y Crédito Público SHCP), the National Banking and Securities Commission (in Spanish, Comisión Nacional Bancaria de Valores CNBV). In the sessions of this working group there have been discussions about the approaches and methodologies on climate risk scenario modelling and stress testing. Due to its participation in this working group, Banco de México included in a 2021 Financial Stability Report a section on climate and environmental risk.

An analysis has been done for Mexico of the legal (criminal and civil) framework for conducting financial investigations and asset recovery cases at the national and sub-national level (for just 6 states), along with this analysis strategic recommendations have been provided. These findings and recommendations have been used for the curricula and material for the capacity building of Mexican public servants, specifically for investigators, prosecutors, and judges. These training sessions are expected to be conducted in 2022.

The Ministry of Treasury has actively participated in the formulation of the Development Finance Assessment (DFA) and validated it, thus ensuring that the national budgeting process considers the DFA and its roadmap in the short-term for the financing of the SDGs. The project further implemented a series of training sessions.

MAIN CHALLENGES
The main challenge was the withdrawal from the project of the lead counterpart, the National Prosecution Office (in Spanish, Fiscalía General de la República FGR). The reports do not provide information on the reasons for this withdrawal. Thus, the focus of the project shifted towards the implementation at the sub-national level. Sub-national prosecution offices agreed on the project activities and have demonstrated acquiescence to fast-track activities and to carry out simultaneous processes to accelerate implementation. Legal analysis on asset recovery and reintegration incorporated the legal framework of 6 states (Campeche, Chihuahua, Durango, Oaxaca, Quintana Roo, and Yucatán); also scoping missions were held to conduct a qualitative and quantitative capacity assessments.

Due to some administrative issues, there were delays in the recruitment of the project staff, which in turn delayed the start of substantive activities of the project.

Finally, restrictions due to the COVID-19 pandemic forced a revision of the budget and restructuring of some of the implementation strategies of the project, mainly those related to in-person activities.

COOPERATION/SYNERGIES
- UNODC leads the coordination with UNDP and UNEP, and specifically assists relevant Mexican authorities at the subnational level to strengthen the institutional framework and capacities to identify, recover and integrate assets resulting from corrupt criminal activities. UNEP also participates in a technical working group in this project.

COHERENCE WITH NATIONAL POLICIES, STRATEGIES AND ACTION PLANS
- UNODC Strategy 2021–2025, Thematic area 3: Preventing and countering corruption and economic crime, Outcome 1. States’ legal, policy and institutional frameworks prevent and counter corruption
and economic crime risks in line with the United Nations Convention against Corruption and recommendations of its review mechanism
- National Development Plan 2020-2024, General line 1. Politics and Government,
PROJECT SUMMARY MEXW72

<table>
<thead>
<tr>
<th>Project name</th>
<th>Combating Money Laundering through prevention and awareness raising</th>
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</thead>
<tbody>
<tr>
<td>Project number</td>
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<tr>
<td>Start date (planned and real)</td>
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<td>End date (planned and real)</td>
<td>March 31\textsuperscript{st}, 2021. October 31\textsuperscript{st}, 2021</td>
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<tr>
<td>Planned Budget</td>
<td>$1,235,537</td>
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<tr>
<td>Donor(s)</td>
<td>The Mérida Initiative via the US State Department, Bureau of International Narcotics and Law Enforcement Affairs (INL)</td>
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<tr>
<td>Spent budget (latest info)</td>
<td>$1,235,537</td>
</tr>
<tr>
<td>Location(s)</td>
<td>Mexico (National)</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

Project aim
The purpose of this project is to raise awareness about the negative impact of money laundering, specifically the consequences on society and how it enables activities on organized crime; how the seemingly innocuous activities by private citizens, such as allowing their bank accounts to be used by third parties, can contribute, and facilitate money laundering and related criminal activity.

Key expected outputs
National Campaign to prevent money laundering in Mexico.
A telephone line (hotline) to report activities related to money laundering is operational.

Key components
For the National Campaign to prevent money laundering in Mexico there were roundtable discussions with people from strategic sectors to provide input on what this campaign should include. Also, a survey was conducted to citizens of six states to obtain their perception on issues related to money laundering. Communication materials were developed and a communication strategy for this campaign.

For the hotline there were the development of protocols to operate it, instruction manuals for operators were developed, trainings to operators, development of a database from the calls, and follow-up on judicial cases that originated from these calls.

National partners
National Banking and Securities Commission (CNBV)
Financial Intelligence Unit (UIF) of the Secretary of Finance (SHCP)
National Prosecution Office (FGR)

<table>
<thead>
<tr>
<th>Name of institution (public body, CSO, academia, private, international org)</th>
<th>Type of institution (federal, state, local)</th>
<th>Level of institution’s mandate or sector of activity</th>
<th>Institution’s role in the project</th>
<th>Main units involved in project within the institution</th>
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</table>

ANNEX V: PROJECT SUMMARIES
IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

<table>
<thead>
<tr>
<th>governance body</th>
<th>National Banking and Securities Commission (CNBV)</th>
<th>Public body</th>
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<th>Financial regulation</th>
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<tr>
<td>Secretary of Finance (SHCP)</td>
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<td>Finance / Treasury</td>
<td>Participation in roundtable discussions</td>
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<td>National Prosecution Office (FGR)</td>
<td>Public body</td>
<td>Federal</td>
<td>Justice</td>
<td>Operation of the hotline</td>
<td></td>
</tr>
</tbody>
</table>

The main changes were in timing. There were some delays due to the Covid-19 pandemic.

PROJECT KEY RESULTS

The main achievements of the project were: general perceptions about money laundering were gathered from different stakeholders through telephone surveys, working groups, Strength Weakness Opportunities Threats (SWOT) analysis of the Mexican Government in the prevention and fight against money laundering and mapping and analysis of reporting channels to find the appropriate channel for the campaign. Likewise, the campaign strategy was designed.

MAIN CHALLENGES

The Covid-19 pandemic has caused some delays in the planned outputs and has created difficulties in the internal communications with counterparts in the project. Since the launch of the national campaign and development of the hotline were intended to be in-person activities.

The decision to conduct the survey via phone increased the cost of the survey. Some adjustments were made within the budget to accommodate for this, there wasn’t an overall increase in the budget.

COOPERATION/SYNERGIES

The main synergy was with the main counterpart, the National Banking and Securities Commission (CNBV), who helped in the organization and planning of most activities of this project.

COHERENCE WITH NATIONAL POLICIES, STRATEGIES AND ACTION PLANS

Public Security National Strategy of the Mexican Government

The main point this project contributed to be the section on money laundering.
IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

PROJECT SUMMARY MEXW41

<table>
<thead>
<tr>
<th>Project name</th>
<th>Public Budgets for Equal Development</th>
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<tbody>
<tr>
<td>Project number</td>
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PROJECT DESCRIPTION

Project aim

The purpose of this project is to contribute to the development of the technical-operational capacities of Results-Based Budgeting in the government of Nuevo León, contributing to the strengthening of transparency and accountability mechanisms, an improvement in the decision-making process of allocation of public resources, and the consolidation of cross-cutting budgetary policies that promote equality and sustainable development. This project intends to develop a digital platform for a Performance Evaluation Integral System; another goal is to consolidate the performance evaluation of government programs, including some that receive federal funding, and investment projects.

Key expected outputs

Diagnostic of the institutional capacities to implement a Results-Based Budgeting and a Performance Evaluation System.

Concept Note with a Capacity-Building Model to strengthen the capacities of the state government so that it can adopt a Results-Based Budgeting and a Performance Evaluation System.

Training and sensibilization sessions for public servants on Results-Based Budgeting and a Performance Evaluation System.

Assessment of the evaluation needs of the state government.

Multiannual evaluation agenda.

Review and recommendations of the Terms of Reference for evaluation of government programs.

Elaboration of proposals for the Terms of Reference for each type of evaluation for public programs including those that receive federal funding from budgetary line 33 (in Spanish, Ramo 33).

Performance Evaluations of public programs including those that receive federal funding from budgetary line 33.

Analysis of the programmatic structure of the state government with recommendations to improve it.

Design and implementation of the Performance Evaluation Integral System of Nuevo León, the target was to develop 5 modules of the system.

Train the personnel of the Monitoring and Evaluation Technical Unit of the Ministry of Finance of the state of Nuevo León on the functionality and operation of the Performance Evaluation Integral System of Nuevo León.
Design and implementation of the Citizen Monitoring web platform.
Communications strategy for Results-Based Budgeting and a Performance Evaluation System.
Guidelines for investment projects and programs to assure inclusiveness.
Analysis of the structure and classification of investment projects and programs.

Key components
Elaboration of Assessments, Concept Notes, and other technical documents; technical assistance to conduct performance evaluations; training of local staff on Results-Based Budgeting and the functionality and operation of the Performance Evaluation Integral System of Nuevo León; development of the digital platform of the Performance Evaluation Integral System of Nuevo León; development of a Citizen Monitoring web platform.

National partners

<table>
<thead>
<tr>
<th>Name of institution</th>
<th>Type of institution (public body, CSO, academia, private, international org)</th>
<th>Level of institution (federal, state, local governance body)</th>
<th>Institution’s mandate or sector of activity</th>
<th>Institution’s role in the project</th>
<th>Main units involved in project within the institution</th>
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</thead>
<tbody>
<tr>
<td>Ministry of Finance of the state of Nuevo León</td>
<td>Public Body</td>
<td>State</td>
<td>Finance / Treasury</td>
<td>Counterpart and funder</td>
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</table>

There was an addendum to the initial contract which eliminated outputs related to the analysis of the state legal framework and other outputs focused with municipalities.
Due to the Covid-19 pandemic, there were delays of some activities, mostly training sessions that had to be postponed and converted into a virtual modality.

PROJECT KEY RESULTS
The project completed an assessment of the state government institutional capacities with regards to Results-Based Budgeting.
The project reviewed the 9 Evaluation Terms of Reference from public programs, including those that receive federal funding from budgetary line 33 and funds, and designed 15 additional ones to encompass all types of evaluations. Between 2018 and 2019 the project delivered a total of 28 evaluations of public programs, surpassing the original target. The project also designed an innovative Priority Index Evaluation, upon which it is based on a proposal of three different multiannual evaluation agendas. A set of analytical tools and a pilot analysis on the goals, indicators, and targets of 10% of the state’s public programs was completed in 2019, the next year the project delivered assessment reports on the goals, indicators, and targets of the totality of the 109 public programs currently being implemented in the state.
The project concluded a first phase of training and sensibilization workshops and seminars for public servants on Results-Based Budgeting. A second phase of capacity-building activities was expected to be completed in during the first semester of 2021.
4 of the 5 modules of the Performance Evaluation Integral System digital platform modules are estimated to be completed during the first semester of 2021.
As a result of this project, the Ministry of Finance (in Spanish Secretaría de Hacienda y Crédito Público, SHCP) assigned a higher score to Nuevo León in the latest reports on the implementation and operation of Results-Based Budgeting and a Performance Evaluation System in Mexico.

MAIN CHALLENGES
The delivery of the Performance Evaluation Integral System digital platform experienced significant delays due to the failure of the original suppliers to fulfil their obligations. This situation prompted the decision to not renew their contracts and seek a new supplier. Four out of five modules of this digital platform were being developed (as of 2020) by a new supplier and was expected to start in this project in 2021. The design and development of the final module, which was included in the scope of the project through the addendum, is contingent on the receipt of pending financial contributions by the donor.

Also, the Covid-19 pandemic affected the work and communications of the project, internal and some external communications with some consultants, had to be done remotely. This has also caused some delays in the implementation of planned outputs and activities of the project.

COOPERATION/SYNERGIES

- Synergy with the counterpart, the Ministry of Finance of the state of Nuevo León

COHERENCE WITH NATIONAL POLICIES, STRATEGIES AND ACTION PLANS

- National Program to Combat Corruption and Impunity and Improve Public Management 2019-2024, Priority objective 3
- The State Development Plan (in Spanish, Plan Estatal de Desarrollo) of Nuevo León, Strategy 3.1 Line 4.3: Efficient and transparent government
PROJECT SUMMARY MEXW95

<table>
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<th>Project name</th>
<th>Technical and Strategic Strengthening Program for the Prevention of Corruption in Mexico City</th>
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<td>Planned Budget</td>
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<td>Donor(s)</td>
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<td>Spent budget (latest info)</td>
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<tr>
<td>Location(s)</td>
<td>Mexico (Mexico City)</td>
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</tbody>
</table>

PROJECT DESCRIPTION

Project aim
The main objective of the project is to consolidate, technically and strategically, the programs and public policies implemented by the Mexico City General Comptroller Office in compliance with the principles established in the United Nations Convention against Corruption (UNCAC) in order to lay the basis for developing coordinated and effective public policies against corruption, with the promotion of civil society participation, and observing the principles of rule of law, proper management of public affairs and public property, integrity, transparency and accountability.

Key expected outputs
Development of a toolkit to establish principles to prevent and fight corruption in the Constitution of Mexico City.

Development of a document with technical tools to prevent and combat corruption to support of a local anti-corruption system in Mexico City.

Development of a strategy to obtain funding and international cooperation for anti-corruption initiatives.

Specialized training for public servants of the Comptrollership

Funding and international cooperation strategy for specific initiatives designed.

Identification of best practices to prevent and fight corruption.

Key components
Toolkits for prevent and fight corruption. Funding strategy to be part of anti-corruption strategies with international donors. Training activities for public servants.

National partners

<table>
<thead>
<tr>
<th>Name of institution</th>
<th>Type of institution (public body, CSO, academia, private,</th>
<th>Level of institution (federal, state, local)</th>
<th>Institution’s mandate or sector of activity</th>
<th>Institution’s role in the project</th>
<th>Main units involved in project within the institution</th>
</tr>
</thead>
</table>
PROJECT KEY RESULTS

The toolkits to prevent and fight corruption have been developed. There has been an exchange of anti-corruption practices between the Mexico City Comptrollership and the UK Embassy in Mexico. A report on Best Practices on anti-corruption was presented at the embassy. Also, the UK Embassy invited personnel of this Mexico City government agency to the travel to the UK and participate in technical workshops to strengthen their prevention of corruption capacities.

Additionally, the Local Anticorruption System was linked to national processes, for instance with the elaboration of the National Digital Platform.

Within the Mexico City Comptrollership there is a Public Construction Laboratory, and the activities of this laboratory have been disseminated with the collaboration of the National Chamber of Consulting Companies (In Spanish, Cámara Nacional de Empresas de Consultoría CNEC).

MAIN CHALLENGES

In July of 2017 the National Anti-corruption System became operational. With this new system the head of the Mexico City General Comptroller Office had to be either ratified or changed, this limited the collaboration with this agency. In 2018 with the election in Mexico City, a new administration took over, it has not been receptive or open to continuing with this project’s work plan activities.

COOPERATION/SYNERGIES

- Synergy with The British Embassy in presenting a report produced by the Mexico City Comptrollership and by inviting the staff of this agency to

Coherence with National policies, strategies and action plans

This is consistent with the National Anti-corruption System Law and the Law of the Mexico City Anti-corruption system.
**PROJECT SUMMARY: MEXW26**

<table>
<thead>
<tr>
<th>Project name</th>
<th>Prevention and Countering Corruption Framework Program with the Mexican Government</th>
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<td>Donor(s)</td>
<td>Tax Administration Service (in Spanish, Servicio de Administración Tributaria SAT); Ministry of Treasury of the Federal Government (in Spanish Secretaría de Hacienda y Crédito Público, SHCP); US Agency for International Development (USAID); United Nations Development Programme in Mexico (UNDP Mexico); Ministry of Public Administration of Zacatecas (In Spanish, Secretaría de la Función Pública de Zacatecas); British Embassy in Mexico (UK Embassy).</td>
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<tr>
<td>Spent budget (latest info)</td>
<td>$538,953</td>
</tr>
<tr>
<td>Location(s)</td>
<td>Mexico</td>
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</tbody>
</table>

**PROJECT DESCRIPTION**

**Project aim**

This is an umbrella project with a general objective to provide technical assistance to contribute to the mainstreaming of the fight against corruption in different federal, state, and municipal counterparts, as well as the private sector, CSOs and academia, to strengthen their capacities and programmes to prevent and combat corruption. These are the identified sub-projects:

Project 1. Prevention and anti-corruption strategy in the Mexican customs system. To produce a document that can outline how to prevent and combat corruption in the Mexican customs system.

Project 2. Strengthening and accompaniment of the Corporate Integrity Program of the Ministry for Public Administration (in Spanish, Secretaría de la Función Pública, SFP).


Project 5. Develop an analytical framework to measure, monitor and evaluate corruption cases and anti-corruption policies in Mexico to the Executive Secretariat of the National Anti-Corruption System.
Key expected outputs

Project 1. Development of a diagnostic document and work strategy, and a coordination protocol between the customs authority (Administración General de Aduanas), which is part of the Tax administration Service and the National Anti-corruption System.

Project 2. Development of a toolkit for Corporate Integrity aimed at Small and Medium-sizes Enterprises (SMEs). Training activities to a group of SMEs using the material from this toolkit. The toolkit includes a glossary of terms for Corporate Integrity in Mexico, a Model of a Code of Conduct for SMEs, an Implementation Guidebook for the Code of Conduct, a Good Practices Report for Corporate Integrity in Mexico, a Self-Assessment Tool for Corruption Risk Management, and a Risk Analysis Protocol.

Project 3. Develop a document with methodology for the “Citizenship Building in Infant Population for the Prevention of Corruption” with the Ministry of Public Administration of Zacatecas. Also, included was a pilot phase with the promotion of citizen values and principles to children of local primary schools.

Project 4. Development of a document with the methodology for the Implementation Review Mechanism of Anti-corruption reforms at the sub-national level, and a document with recommendations for implementing this mechanism. This feeds into the Corruption Monitoring and Evaluation Model (in Spanish, Modelo de Seguimiento y Evaluación de la Corrupción MOSEC) being developed by the Executive Secretariat of the National Anticorruption System.


Key components

Project 1. Publications (technical documents) including a diagnostic document, work strategy, and a coordination protocol between the customs authority and the National Anti-corruption System.

Project 2. Knowledge products on Corporate Integrity for Small and Medium-sizes Enterprises (SMEs), and trainings on corporate integrity using this material.

Project 3. A publication with a methodology for program implementation and citizenship building activities for primary school children.


Project 5. Recommendations report using information on international best practices in measuring, monitoring, and evaluating corruption.

<table>
<thead>
<tr>
<th>Name of institution</th>
<th>Type of institution (public body, CSO, academia, private, international org)</th>
<th>Level of institution (federal, state, local governance body)</th>
<th>Institution’s mandate or sector of activity</th>
<th>Institution’s role in the project</th>
<th>Main units involved in project within the institution</th>
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</thead>
<tbody>
<tr>
<td>Tax Administration Service (in Spanish, Servicio de Administración Tributaria SAT);</td>
<td>Public body</td>
<td>Federal</td>
<td>Tax administration and collection</td>
<td>Funder and counterpart (project 1)</td>
<td>Customs authority (Administración General de Aduanas)</td>
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<td>Ministry for Public Administration</td>
<td>Public body</td>
<td>Federal</td>
<td>Public sector governance</td>
<td>Counterpart (project 2)</td>
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IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO

<table>
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<tr>
<th>(in Spanish, Secretaría de la Función Pública, SFP)</th>
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<th>International Organization</th>
<th>Contributed in the implementation (project 2)</th>
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<td>Public body</td>
<td>state</td>
<td>Public sector governance</td>
</tr>
<tr>
<td>Executive Secretariat of the National Anti-Corruption System</td>
<td>Public body</td>
<td>Federal</td>
<td>Public sector governance</td>
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</tbody>
</table>

PROJECT KEY RESULTS

Project 1. Outputs for this project were completed and the evaluation office (Administración General de Evaluación) of the Tax Administration Service (in Spanish, Servicio de Administración Tributaria SAT) was interested in supporting the implementation of the action and coordination protocol, which was one of the project outputs, also there were discussions with this same office of a second phase of this project.

Project 2. Corporate Integrity Toolkit for SMEs was completed, and 15 training workshops were conducted using the toolkit, the beneficiaries of these training activities were more than 70 SMEs from 5 main business sectors: construction, health, financial, legal, and accounting, and multi-sectorial (sports, energy, and others). 20 business chambers participated in the Working Group of this project. This project strengthened the role of UNODC as a respected technical agency on anticorruption matters in the private sector and contributed towards the signing of an MoU between the Mexico office and the Ministry for Public Administration to give technical assistance for different anti-corruption initiatives, among them the creation of integrity incentives for businesses involved in public procurement processes.

Project 3. This Citizen Building initiative reached over 500 children from primary schools in the city of Zacatecas. Approximately 25 teachers and 40 volunteers were involved in the initiative. According to data from surveys conducted among the children there was a significant contribution in their understanding of concepts related to corruption such as honesty, legality, empathy, transparency, accountability, integrity, and rule of law. Additionally, the methodology applied in this local project interested some national agencies: the Ministry for Public Administration, specifically the office of Social Comptrollership, was interested in adopting this methodology as a tool for strengthening the prevention of corruption activities implemented by the Local Social Comptrollerships and thus there were talks of developing a workplan for this; the Ministry for Public Education (in Spanish, Secretaría de Educación Pública SEP) also showed interest in adopting this methodology to be included in the National Education Policy as a tool to strengthen honesty: UNODC planned to draft a concept note for the Ministry for Public Education to implement the methodology in four states in Mexico as part of an overall anti-corruption strategy from the education perspective.
Project 4. The two documents that were outputs for this project were completed, as part of the process of the elaboration of these projects, there was an exercise of the identification of several anti-corruption good practices in the states of Sonora, Campeche, and Nuevo León, which led to of exchanges among these states. Local institutions in Sonora such as the audit institution and the Social Comptrollerships were interested in a second phase of this project. There was also interest from Comptrollerships from other states like Campeche, Nuevo León, and Puebla to be part of a second phase.

Project 5. The report was produced and was submitted to the UNODC office in Vienna for quality assurance.

MAIN CHALLENGES

There were delays in the implementation of its activities in project 1 and 4 related to the funding parties due to administrative processes and the time need for the hiring of staff for these projects.

In 2018 the presidential and legislative elections took place in Mexico, with a new presidential administration there was a change in the heads of the agencies involved in these projects.

The Covid-19 pandemic also caused some delays in the implementation of some activities, especially those that were intended to be conducted in-person.

COOPERATION/SYNERGIES

- Synergy with UNDP for the project on Corporate Integrity. UNDP was part of the project to develop a toolkit for Corporate Integrity aimed at Small and Medium-sizes Enterprises (SMEs).

Coherence with National policies, strategies and action plans

- This umbrella provided general support in the implementation of the United Nations Convention against Corruption in Mexico at the national, state and local level.
THE PROJECT MADE AN INNOVATIVE USE OF THE UNCAC, AS ADAPTED TO A FEDERAL COUNTRY

Over the years, UNODC has been able to use its neutral role as a guardian of the UNCAC to network anti-corruption peers from various States thanks to a highly innovative idea: the transfer to the inter-State level (i.e., within Mexico as a federal country) of the UNCAC international peer-to-peer review mechanism (MEXAB5 project).

The project organised and facilitated peer review among “sister” institutions from voluntary States. For each review, one State was reviewed by two other States. Each State involved gained experience both as reviewee (once, by two different States) and as reviewer (twice, for two different States). Within each review, the respective institutions would thus be networked: for instance, Comptrollerships, audit services, institutions in charge of information of public importance and data protection (etc...) from the three concerned States (reviewee and reviewers).

This highly innovative approach enabled the UNODC and its partners to adjust the framework of the UNCAC to a federal context, thus ensuring relevance to the Convention, to the constitutional and legal framework of Mexico, and to the needs of the citizens as end beneficiaries, who mostly depend on State-level institutions to be protected from corruption.

This good practice is highly reproductible to other federal and/or highly decentralised countries. It would have been impossible for any other actor but the guardian of the Convention.

THE PROJECT FACTORED THE PARTNERS’ CONSTRAINTS IN TERMS OF NORMATIVE FRAMEWORK AND CAPACITIES TO DESIGN RESPONSIVE ACTIVITIES.

The MEXAB5 project aims to contribute to the whole range of corruption prevention envisaged in the national anti-corruption strategy. To this end, the project seeks to increasing transparency, accountability, and citizen participation through a series of pilot initiatives. It is a complex project divided into four components that, in turn, include a wide array of tasks. The components are: 1. prevention and management of conflict of interest; 2. Citizen empowerment for fighting corruption; 3. Strengthening integrity in Public Procurement Processes; and 4. Peer Review Mechanism for Local Anti-Corruption Systems.

Local anti-corruption groups and institutions face a significant gap in resources and capacities, which can be filled through tailored interventions by a reputable international organization. This has been considered in the project design. The project outputs, such as capacity-building activities around conflict of interest, have been well-received by public officials and have been tailored to local needs through consultation with partners. The training sessions and materials have been praised as outstanding and useful. The adaptation of the citizen training modules to Nuevo León and Coahuila states was well-managed and received positively, thanks to the involvement of public sector, CSOs, and university representatives. Stakeholders who participated in the peer-to-peer review mechanism were satisfied with the opportunity for dialogue among a diverse group of actors.

UNODC has integrated several factors to ensure the relevance of the project, including involvement of local stakeholders in adapting training modules and materials, convening capacity as a neutral and expert international organization, need to secure high-level commitment, and provision of no-cost assistance to public sector counterparts. The sponsorship of international organizations has also been seen as crucial in "mobilizing key actors' willingness to make things possible."
AN ADAPTIVE STRATEGY TO DWINDLING STRATEGIC PARTNERSHIP OVERSTRETCHED MANAGEMENT CAPACITY.

The main challenges faced by the MEXAB5 project involve the shifting political agendas and the UNODC’s field office’s administrative and personnel capacities. The political context of Mexico changed drastically in 2018 with the reshuffle of authorities at the federal level and the associated changes. Adaptation to these changes by the project was slow and limited, and cooperation at the federal level was eventually discontinued and the project transitioned toward State-level institutions, with which the project successfully stroked partnerships and initiated interaction with a wide array of government and social actors in many States.

This effort to retain relevance in the face of a political shift transformed the MEXAB5 into a much broader, more fluid project which required exceptional reactivity to a multiplicity of State-level partners’ needs. But there is a relationship between the number of partners involved and the capacity of project management to address their needs (with fewer public institutions, projects would be more easily managed). Multi-sector projects involving public institutions with diverging interests are inherently more difficult to manage and are less conducive to a fruitful dialogue with both international donors and government counterparts. Obviously, a committed team of professionals (project champions) who believe firmly in the importance of a project is more likely to be found in one institution than scattered among several institutions.

This project design was no longer suitable to the donor’s conditions: contrary to other donors, the funding mechanism for MEXAB5 requires that UNODC advance the budget and report on implemented activities before disbursing its contribution. This funding pattern requires well-planned, predictable activities—with the new set of partners, this was no longer the case. The installed capacity of UNODC – within the project, at the level of the country office, also affected by the need to rely on the administrative capacity and processes of the UN Mexico Office (UNDP financial administration in charge of disbursements) did not follow. Several interviewees pointed the office’s shortage of personnel, the absence of commensurate service contracting, and the massive workload that the available people had to face. In addition, the lack of adequate activity and financial planning, stringent control procedures and the lengthy contracting procedures resulted in difficulties in receiving the donor’s contributions, produced significant delays, provoked the cancellation of scheduled events with short notice, and forced to consider a project non-cost extension which was finally not granted by the donor.

The lesson learned is that UNODC must carefully consider the scope of its projects to be able to fulfil its commitments in a timely and effective way. Adapting to political shifts through new partnerships can only work if the project’s management and administrative infrastructure are able to back this transition up. Better strategic planning, process assessments and responsible tie-off activities are future improvement areas, if UNODC is to retain its relevance in a complex political environment in Mexico, with a spread at the State and municipal levels.

CHALLENGES IN BUDGET PLANNING AND OVER-CENTRALISED PROJECT MANAGEMENT AT SEVERAL LEVELS AFFECTED UNODC’S CREDIBILITY.

Series of interviews in Mexico and in headquarters showed that MEXAB5 project planned too much for general services (travel items) but insufficient budget for consulting services. One high-level interviewee of a United Nations Agency was startled to realize that the project staff had not requested an amendment of budget lines over 2022. This decision was seemingly due to cumbersome contracting procedures among UN agencies – it seemed simpler to have staff members implement all tasks themselves (on force account) than spending time on procurement. To compound this situation, project management adopted an over-centralized approach, combining several functions—for instance, management/coordination, substantive expert working on deliverables and advising counterparts, and activity-implementer—which contributed to lowered awareness of deadlines, and to bottlenecks at several levels: in the trimonthly planning of activities and consequent request for financial advances, in the Office’s financial services, and, to some extent, also in headquarters’ clearance processes. These patterns bridle efficiency, whereas the unadjusted budget structure already strains the existing human resources. While expressing deference for the dedication and thematic expertise of the staff, a large proportion of interviewees raised concerns about haphazard execution, last-minute
confirmations or cancellations of important events, and lack of predictability. Through interviews with several partners, the evaluation found that poor management of some portfolio activities had a strong adverse effect on relations with partners, and in some cases resulted in severance of relationships. As an interviewee put it, “This project would require at least five [times its management capacity] (...) We have had to push constantly to hire, reserve flights and hotels, etc”. Budget execution trends are very low, with most of implemented activities having been carried out, and funds disbursed, during the last semester (many during the last trimester) of this three-year project.

The COVID-19 pandemic certainly caused a large part of these delays, and such trends can be observed in some other projects in the portfolio – but none to that extent. According to several interviewees, factors including the low budget execution rate, administrative and procurement gridlocks, and the delayed disclosure of financial balances have led to successive requests for project extensions and might negatively affect UNODC’s credibility. Notably, some interviewees stressed that the disclosure of fee-for-service financial balances is extremely overdue. These reputational risks have already compromised resource mobilisation for follow-on projects – although this is of limited impact, given the already challenging political context.

**LAST-MINUTE AND/OR OPPORTUNITY-BASED EVENT PLANNING DISRUPTS THE FLOW OF TASKS AND WORK PROCESSES.**

With many activities being implemented in parallel to come up with outputs, there are limitations as to what degree of strategic management can be practiced in an ‘umbrella project’. The evaluation team directly observed one day of conversations of a peer-to-peer review workshop in Coahuila. However, the team knew of three instances of last-minute confirmation or cancellation of important project events (one training workshop to be delivered in the state of Quintana Roo, a two peer-to-peer review workshops to be conducted in Quintana Roo and Sonora). In two instances, cancellation happened less than two weeks from events for which the counterparts had earmarked days of work, and which involved significant in-country travel. In one case, a similar event – including venue, flights, and hotel reservations - was confirmed just 24 hours before its launch, disrupting participants planned working schedules. Several interviewees commented that they had to reschedule their working schedule with extreme short notice in order to participate in another event (this had been planned and timed late to seize the opportunity offered by the Guadalajara International Book Fare). This also affected UNODC project team’s workflow, and the relocation of staff time to this late event from planned activities which had to be put on hold. This could have been avoided with more advance planning and decision making.
## Project and implementation timeline

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<tr>
<th>ANNEX VII: OVERVIEW OF UNCAC RECOMMENDATIONS RELEVANT TO THE PORTFOLIO</th>
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| **MEXAD4: Risks and Resource Allocation for Sustainable Development**  
(August 1, 2021–February 28, 2023) | **UNCAC’s IRM recommendations and/or technical assistance needs identified to improve implementation of the Convention**  
[CAC/COSP/IRG/I/3/1/Add.25 (20 August 2015):](
It is recommended that Mexico:
- Undertake a comparative study of Federal and State law on the issues in Chapters III and IV of the Convention and, where there are differences, open a space for dialogue between the Federation and States in order to ensure the implementation of the Convention at all State levels.
- Technical assistance that would help Mexico to implement the chapter under review:
  - Art. 44: On-site assistance from an anti-corruption expert, training programmes, development of an action plan.
  - Art. 50: Summary of good practices and lessons learned; training programmes for the authorities responsible for the design and use of special techniques and international cooperation in this regard; legal advice and model agreements and contracts.  
[CAC/COSP/IRG/II/1/1/Add.11 (3 December 2018):](
Technical assistance needs identified to improve implementation of the Convention:
- Mexico indicated that it requires technical assistance (training and sharing of good practices) in the area of asset recovery. |
| **MEXAB5: Strategy for Strengthening Corruption Prevention Capacities in Mexico**  
(August 1, 2019 – January 31, 2023) | **UNCAC’s IRM recommendations and/or technical assistance needs identified to improve implementation of the Convention**  
[CAC/COSP/IRG/I/3/1/Add.25 (20 August 2015):](
It is recommended that Mexico:
- Undertake a comparative study of Federal and State law on the issues in Chapters III and IV of the Convention and, where there are differences, open a space for dialogue between the Federation and States in order to ensure the implementation of the Convention at all State levels.
- Consider the possibility of taking measures to protect reporting persons and measures for reinstating reporting persons in their position of employment; adopt the relevant draft decree and ensure that it is of a broad nature (art. 33). |
**IN-DEPTH CLUSTER EVALUATION ON ANTI-CORRUPTION IN MEXICO**

CAC/COSP/IRG/II/1/1/Add.11 (3 December 2018): It is recommended that Mexico:

- Conduct a comparative study of federal and state legislation relating to the issues covered by chapters II and V of the Convention and, in case of divergence, establish a space for dialogue between the federal Government and the states in order to ensure that the Convention is implemented at all levels of the State.
- Develop and implement effective, coordinated anti-corruption policies and continue to strengthen coordination between the authorities with regard to the prevention of corruption. The development of a national anti-corruption strategy would be a positive step (art. 5, para. 1).
- Broaden knowledge about the prevention of corruption and disseminate that knowledge among its anti-corruption bodies; and grant the prevention body or bodies the necessary independence (art. 6, paras. 1 (b) and 2).
- Identify the public positions that are considered especially vulnerable to corruption and adopt adequate procedures for the selection and training of individuals for those positions and, where appropriate, their rotation to other positions (art. 7, para. 1 (b)).
- Consider establishing measures, in addition to the obligation to report, to facilitate the reporting by public officials of acts of corruption when such acts come to their notice in the performance of their functions (art. 8, para. 4).
- Ensure that an effective mechanism is in place for the internal review of all public procurement procedures; and provide for the possibility for persons other than those invited to participate in the bidding process to report irregularities in direct award procedures and selective tendering processes involving at least three potential contractors.
- Further simplify its administrative procedures, where appropriate, and periodically publish information on the risks of corruption in its public administration (art. 10 (b) and (c)).
- Enact and enforce legislation that strengthens and increases the participation of civil society in decision-making in key areas.
- Continue its efforts to ensure that the relevant anti-corruption bodies are known to the public; and provide access to such bodies (art. 13, para. 2).

Technical assistance needs identified to improve implementation of the Convention:

- Mexico indicated that it required technical assistance for purposes of sharing good practices and in order to secure funding to set up a system that would analyse different databases and detect inconsistencies or suspicious behaviour that could indicate conflicts of interest or instances of corruption.
| Annex VII: Overview of UNCAC Recommendations Relevant to the Portfolio | 101 |

| UNODC Global Integrity Education (October 2019 – September 2023) | CAC/COSP/IRG/II/1/1/Add.11 (3 December 2018): |
| - | It is recommended that Mexico: |
| - | • Enact and enforce legislation that strengthens and increases the participation of civil society in decision-making in key areas. |
| - | • Continue its efforts to ensure that the relevant anti-corruption bodies are known to the public; and provide access to such bodies (art. 13, para. 2). |

| Combating Money Laundering through prevention and awareness raising (November 1, 2018 – October 31, 2021) | CAC/COSP/IRG/II/1/1/Add.11 (3 December 2018): |
| - | • Strengthen measures for cooperation between its investigating authorities and the private sector (art. 39 (1)). |
| - | • Continue its efforts to expedite requests for financial information (art. 40). |

| Public Budgets for Equal Development (June 14, 2018 – 2023) | CAC/COSP/IRG/II/1/1/Add.11 (3 December 2018): |
| - | It is recommended that Mexico: |
| - | • Conduct a comparative study of federal and state legislation relating to the issues covered by chapters II and V of the Convention and, in case of divergence, establish a space for dialogue between the federal Government and the states in order to ensure that the Convention is implemented at all levels of the State. |

| - | It is recommended that Mexico: |
| - | • Conduct a comparative study of federal and state legislation relating to the issues covered by chapters II and V of the Convention and, in case of divergence, establish a space for dialogue between the federal Government and the states in order to ensure that the Convention is implemented at all levels of the State - (components 3, 4 and 6). |
| - | • Develop and implement effective, coordinated anti-corruption policies and continue to strengthen coordination between the authorities with regard to the prevention of corruption. The development of a national anti-corruption strategy would be a positive step (art. 5, para. 1) - (components 3, 4 and 6). |
| - | • Broaden knowledge about the prevention of corruption and disseminate that knowledge among its anti-corruption bodies; and grant the prevention body or bodies the necessary independence (art. 6, paras. 1 (b) and 2) – (components 1, 4, 5). |
| - | • Ensure that the recruitment of all public servants, including for positions that are filled through direct internal appointment, is based on objective criteria such as merit (art. 7, para. 1 (a)) – (components 1, 4 and 5). |
| - | • Identify the public positions that are considered especially vulnerable to corruption and adopt adequate procedures for the selection and training of individuals for those positions and, where appropriate, their rotation to other positions (art. 7, para. 1 (b)) – (components 1, 4 and 6). |

- Consider establishing measures, in addition to the obligation to report, to facilitate the reporting by public officials of acts of corruption when such acts come to their notice in the performance of their functions (art. 8, para. 4) – (components 1 and 6).
- Strengthen the asset declaration system and consider conducting spot checks; establish a system for public officials to declare any outside activities and employment; and clarify the system for the declaration of gifts and whether the acceptance of gifts is permitted (art. 8, para. 5) – (components 1 and 6).
- Ensure that an effective mechanism is in place for the internal review of all public procurement procedures; and provide for the possibility for persons other than those invited to participate in the bidding process to report irregularities in direct award procedures and selective tendering processes involving at least three potential contractors (art. 9, para. 1 (d)) – (component 2).
- Further simplify its administrative procedures, where appropriate, and periodically publish information on the risks of corruption in its public administration (art. 10 (b) and (c)) – (components 1, 5 and 6).
- Enact and enforce legislation that strengthens and increases the participation of civil society in decision-making in key areas. That includes the future appointment of an anti-corruption prosecutor through a process that is transparent and that ensures the prosecutor’s independence in good time and in accordance with the standards established in the Convention (art. 13) – (components 2, 3 and 6).
- Continue its efforts to ensure that the relevant anti-corruption bodies are known to the public; and provide access to such bodies (art. 13, para. 2) – (components 2, 3, 4 and 6).

| Component 4: Strengthening the implementation of the anticorruption systems at the state level |
| Component 5: Strengthening the analytical framework for measuring, monitoring and evaluating corruption cases and anti-corruption policies in Mexico |
| Component 6: Prevention of corruption in sports in Mexico |

| MEXZ95: Technical and Strategic Strengthening Program for the Prevention of Corruption in Mexico City (MEXZ95) |
| (September 15, 2016 – September 15, 2018) |
| The project completed its implementation before the publication of the recommendations of the second round of the IRM in which UNCAC Chapter II (Preventive Measures) was reviewed. |

**Sources:**
