

# Final External Evaluation Report

April 2020



**Final External Evaluation of the Joint Regional Anti-Corruption Initiative (RAI) and United Nations Office of Drugs and Crime (UNODC) Southeast Europe (SEE) Regional Programme on Strengthening the Capacity of Anti-corruption Authorities and Civil Society to Combat Corruption and Contribute to the UNCAC Review Process**

Evaluators: Suzanne Mulcahy PhD and Coralie Pring

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## Abbreviations

ADA	Austrian Development Agency
APIK	Agency for the Prevention of Corruption in Bosnia and Herzegovina
APC	Agency for the Prevention of Corruption Montenegro
BiH	Bosnia and Herzegovina
CoE	Council of Europe
COVID-19	Corona Virus Disease 2019
CoSP	Conferences of the State Parties
CRA	Corruption risk assessment
CST	Civil Society Team (UNODC)
CPL	Corruption proofing of legislation
CSOs	Civil Society Organisations
DAC	Development Assistance Committee
EC	European Commission
EP	European Parliament
EU	European Union
GRECO	Group of States against Corruption
HJPC	High Judicial and Prosecutorial Council of BiH
IT	Information Technology
OECD	Organisation for Economic Cooperation and Development
OSCE	Organisation for Security and Cooperation in Europe
RAI	Regional Anti-corruption Initiative
SCPC	State Commission for the Prevention of Corruption (North Macedonia)
SEE	Southeast Europe
SELDI	Southeast Europe Leadership for Development and Integrity
TI	Transparency International
UNCAC	United Nations Convention Against Corruption
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development
WB	World Bank

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# 1. Executive Summary

## Overview

This report contains the full findings from an independent final evaluation of the Regional Anti-corruption Initiative (RAI) - United Nations Office on Drugs and Crime (UNODC) joint Southeast Europe (SEE) Regional Programme on Strengthening the Capacity of Anti-corruption Authorities and Civil Society to Combat Corruption and Contribute to the United Nations Convention against Corruption (UNCAC) Review Process (herein ‘the Regional Programme’).

RAI is a permanent regional intergovernmental organization established in 2000 composed of nine member countries from the SEE region, and is based in Sarajevo, Bosnia and Herzegovina. Its mission is to lead regional cooperation to support anti-corruption efforts by providing a common platform for discussions among governments and civil society through sharing knowledge and best practices. The UNODC is a United Nations Office that was established in 1997 as the Office for Drug Control and Crime Prevention. This programme of work was undertaken by the Civil Society Team (CST) based in UNODC Headquarters in Vienna, Austria. The Office is the guardian of the UNCAC.

The Regional Programme was undertaken between December 2015 and is due to be completed by end of August 2020. It delivered a broad range of activities undertaken by the two implementing partners to strengthen anti-corruption capacities in Albania, Bosnia and Herzegovina (BiH), Kosovo<sup>\*1</sup>, Moldova, Montenegro, North Macedonia and Serbia. Some activities were also undertaken in Bulgaria, Croatia and Romania. RAI was responsible for delivering three programmatic objectives: the introduction or strengthening of a corruption risk assessment (CRA) mechanism, the introduction or strengthening of a mechanism for corruption proofing of legislation (CPL) and the development of a regional framework for cooperation on data exchange in asset disclosure and conflict of interest. The UNODC was responsible for delivering the following programmatic objectives: building the capacity of civil society organisations (CSOs) to contribute to the UNCAC reviews in their country, building capacity of CSOs to work with the private sector on UNCAC and related activities, and improving CSO networks to better engage in the UNCAC review process.

## Objectives and scope of the evaluation

The objectives of this evaluation were to assess the full programme of work in the programme countries of Albania, BiH, Kosovo\*, Moldova, Montenegro, North Macedonia and Serbia, in order to improve accountability for work undertaken and to aid learning for future strategic decisions on programme work, especially in the context of the preparation of the next phase of the Regional Programme which is currently under development by the implementing Programme partners.

The evaluation team was asked to assess the programme of work according to the selected Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) criteria of relevance, effectiveness and efficiency of the outcomes. In addition, the evaluation was asked to assess the applied theory of change, prospects of sustainability, the application of gender mainstreaming and social inclusion via the Regional Programme and the success of the partnership between the Regional Programme Partners.

## Methods of the evaluation

This evaluation was undertaken using a mixed-method, multi-stage design, and incorporates findings from: a desk-top literature review of 53 programme-relevant documents, reports and other literature; in-depth semi-structured qualitative interviews with 12 key regional stakeholders for the RAI objectives and 8 regional stakeholders for the UNODC objectives (both in-person and via the telephone); 2 online surveys - the first of 25 RAI beneficiaries and the second of 15 UNDOC CSO

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beneficiaries in the Regional Programme countries<sup>2</sup>; and field visits to BiH, North Macedonia and Montenegro where in-depth semi-structured qualitative interviews were conducted with a total of 32 beneficiaries and stakeholders. Data was gathered from November 2019 until March 2020.

Data collection tools were developed to reflect the evaluation research objectives as detailed in Annex 9, and were approved by the implementing partners prior to the start of the research phase. Wherever possible, findings were triangulated from multiple data sources to verify accuracy.

## Key findings

- **Relevance:** The Regional Programme addresses a clear need by supporting national anti-corruption institutions and CSOs to strengthen their capacities in relation to anti-corruption measures and, for CSOs specifically, in relation to UNCAC. These objectives respond to consistent evidence and messaging from the international community that, despite the strengthening of relevant legal frameworks and anti-corruption institutions in the region, systemic corruption continues to permeate the countries of SEE and an implementation gap prevails. Of particular relevance is the need for the governments of the region to cooperate more effectively with civil society groups on anti-corruption issues, which is a core objective of the Regional Programme.
- **Effectiveness:** The Regional Programme was generally effective, in the sense that the planned activities and outputs were largely realistic and were implemented to a high standard. More crucially, it was effective in the sense that most expected outcomes were achieved, and where not fully achieved, developments towards achievement were observed. Where it had more limited success was in the follow-on activities to ensure the momentum gained was sustained, the coordination across the individual Outcomes and the knitting of civil society and state anti-corruption actors more closely together through the Regional Programme activities, particularly across the two parts of the programme.
- **Efficiency:** The project supported 23 state beneficiaries and the capacity-building of 73 representatives from CSOs, with a relatively modest budget of 1 million euro. Overall, the project finances were well-managed and the budget was largely realistic. Funding and more staffing for UNODC follow-up activities would have contributed to improved effectiveness. Regarding the timeframe, some adjustments were necessary. The need for 2 no-cost extensions, requested in 2019 and 2020, was related to Outcome 3 of the RAI objectives. The first extension request was caused by delays in implementation and the second unavoidable request (2020) was linked to the Corona Virus Disease 2019 (COVID-19) public health crisis which necessitated postponing the signing ceremony of Outcome 3.
- **Sustainability:** Many results achieved by the Regional Programme show a high likelihood of sustainability. This holds true for the many activities aimed at building institutional capacity and expertise, both at the state institutional level and among CSOs. There is also great potential for sustained impact in the area of regional cooperation on data exchange on asset declarations via the International Treaty developed under this Regional Programme. The sustainability and impact will be enhanced if RAI undertakes advocacy to ensure that as many states as possible (within and outside the region) ultimately sign, ratify and implement the Treaty. There are a number of indications of planned future use of skills and knowledge related to UNCAC, as well as expected continued use of the E-platform. However, CSO opportunities to engage on UNCAC will largely depend on what stage their country is at with the 2nd review cycle.
- **Gender and Social Inclusion:** The Regional Programme achieved its targets related to a balanced gender participation in capacity-building activities and other programme events and subtly raised awareness of the importance of gender mainstreaming through the programme activities, in a region where this remains a

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relatively underdeveloped area of work. At the institutional level, RAI improved its internal policies to make them more gender-sensitive.

### Lessons learnt

- While the RAI-UNODC cooperation worked well in terms of communication and implementation, there could have been a much deeper and substantive collaboration across the two parts of the Regional Programme. This would have elevated it from being ‘just’ the sum of its parts to being a comprehensive programme delivering impact in a coordinated way via top-down and bottom-up agents of change.
- RAI’s Outcomes 1 and 2 involved the development of information technology (IT) solutions for CRA and CPL. This was the first time that RAI embarked on a digitalisation project and the evaluation found that insufficient time and resources was invested in the initial needs assessment and specification-writing phase. Likewise, the E-platform Hub developed under the UNODC activities was welcomed but a strategy for promoting ongoing usage would be welcomed. A key lesson is to not underestimate the time and resources needed in the planning phase for IT tools, in particular the time needed for constant and detailed communication between the beneficiaries and the developers, as well as to plan sufficiently for activities to support continued use.
- While the Regional Programme activities were generally delivered to a high standard and valued by beneficiaries, there was scope for more follow-up advocacy and support to ensure the momentum was not lost after interventions took place. This was true across all 6 Outcomes. A sustained advocacy campaign within and beyond the SEE region will also be particularly important for Outcome 3 to reach its full potential as an international anti-corruption tool. While the UNODC responded well to barriers of lack of knowledge on UNCAC and lack of networking opportunities which prevents CSOs from participating in UNCAC review processes, other barriers such as lack of resources, funding and motivation to stay engaged in the process also hamper achievement in this area, as well as lack of political will to work with CSOs and low capacity of the focal points.<sup>3</sup>
- Monitoring of the downstream impact of the interventions by RAI and UNODC was carried out only in a pro forma manner. More substantive ongoing monitoring and evaluation should be embedded into future programming.

### Key Recommendations

#### Both Partners should:

- ❖ Place greater emphasis on monitoring and promoting implementation of anti-corruption policies and initiatives
- ❖ Plan and promote greater synergies between the two implementing partners
- ❖ Invest more in partnerships with other stakeholders in the region
- ❖ Review the Regional Programme Theory of Change logic and monitoring and evaluation approach
- ❖ Revise the approach to planning and rollout of technological solutions
- ❖ Place greater focus on post-activity follow up and advocacy
- ❖ Adopt a more sectoral approach to allow targeted capacity-building
- ❖ Invest in Communications, Public Relations (PR) and Advocacy capacity

#### Specifically for UNODC:

- ❖ Continue with trainings but review the style, content and groupings.

#### Specifically for RAI:

- ❖ Ensure the Treaty on Data Exchange is promoted and adopted both regionally and internationally.

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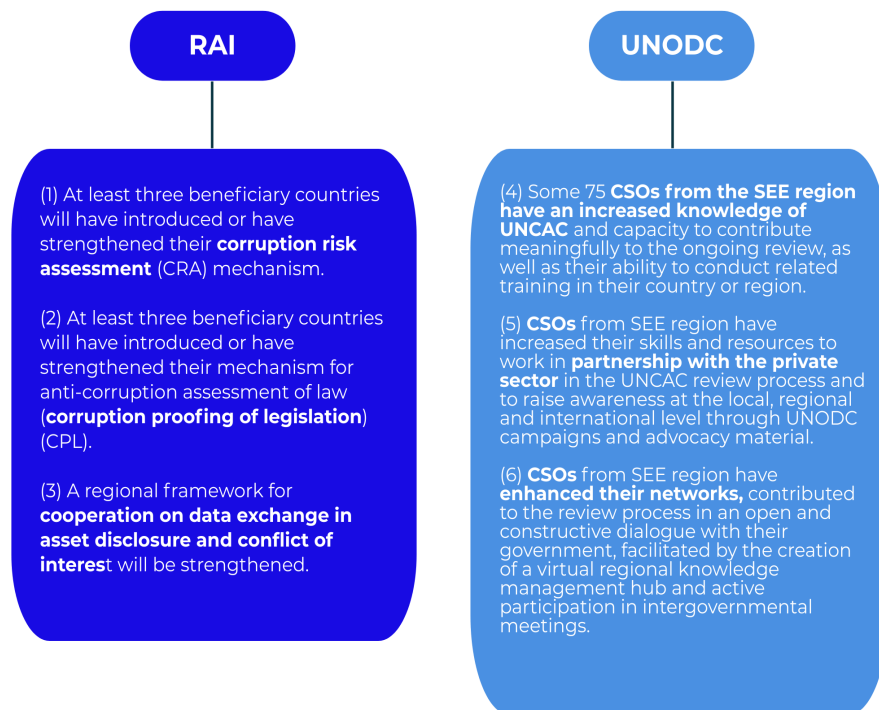
## 2. History and Overview of the Regional Programme

RAI is a regional intergovernmental organization, established in 2000 and made up of 9 member countries from the SEE region: Albania, BiH, Bulgaria, Croatia, Moldova, Montenegro, North Macedonia, Romania and Serbia. RAI's overarching objective is to support the anti-corruption efforts of the member countries by providing a common platform for regional discussions and knowledge-sharing among governments and civil society. RAI Secretariat is based in Sarajevo and it serves as the centre for anti-corruption cooperation in the region through coordination, facilitation and dissemination of best practices and lessons learnt. The RAI Secretariat tailors its activities to directly support the efforts of member countries to achieve the objectives stipulated in their anti-corruption agendas and strategies, as well as to meet European and International standards and requirements related to anti-corruption.

UNODC is a United Nations office that was established in 1997 as the Office for Drug Control and Crime Prevention by combining the United Nations International Drug Control Program and the Crime Prevention and Criminal Justice Division in the United Nations Office at Vienna. It is a member of the United Nations Development Group and was renamed the United Nations Office on Drugs and Crime in 2002. The programme was implemented by the UNODC CST with close coordination by the UNODC team for the Regional Programme for SEE and the Corruption and Economic Crime Branch. The Office is mandated to assist Member States in their struggle against illicit drugs, crime and terrorism and it is the guardian of UNCAC, which entered into force in 2005. The UNODC provides legislative and policy advisory support for the implementation of the Convention including the review process. The 2nd review cycle was due to begin in November 2015, at the time of the start of this programme of work, with a focus on 2 chapters of the convention on preventive measures and asset recovery.

The Regional Programme, which was conceived in 2015, brought together these two organization in a cooperation against the backdrop of continued challenges in translating institutional and legal progress in anti-corruption into meaningful implementation of laws and policies in the region. RAI Secretariat and the UNODC jointly implemented the Regional Programme, which commenced in December 2015 and will be completed by end August 2020. The budget is EUR 1 million and is almost entirely funded from Austrian Development Agency with small contributions from other donors. It is implemented in Albania, BiH, Kosovo\*, Moldova, Montenegro, North Macedonia and Serbia. Certain Regional Programme outcomes also include beneficiaries from Bulgaria, Croatia and Romania, however, as they were not funded by the Austrian Development Agency (ADA), work in these countries is not included as part of this evaluation.

The Regional Programme has 6 key intended outcomes:



**Figure 1. Regional Programme Outcomes**

The direct beneficiaries of the Regional Programme are 23 national ministries and anti-corruption bodies and 73 representatives from 57 CSOs. The Regional Programme Outcomes were developed jointly between RAI and UNODC based on their respective expertise, as well as their regional and thematic knowledge. While RAI Secretariat leads implementation of the Outcomes 1, 2 and 3, the UNODC leads the implementation of Outcomes 4, 5 and 6. In order to achieve its objectives, the Regional Programme involved the following core activities: the development of national methodologies and IT solutions for CRA and CPL; the development of legal proposals for a regional mechanism on asset disclosure and conflict of interest; the implementation of training sessions on the UNCAC and its review mechanism, and the engagement of the private sector; the facilitation of multi-stakeholder networking opportunities; and the creation of a virtual regional knowledge management Hub. The Regional Programme promotes the mainstreaming of gender equality and social inclusion across all of its objectives.

In November 2019, the consultancy team of Dr. Suzanne Mulcahy and Coralie Pring were selected to carry out a final external evaluation of the Regional Programme.<sup>4</sup> The purpose of this evaluation is twofold: accountability and learning. The Terms of Reference for the evaluation (see Annex 2) requests the evaluators to assess how relevant, effective and efficient the programme was and what lessons can be learnt from the programme. The independent evaluation was to provide evidence for results achieved and challenges faced during the implementation period, and to help the partners reflect and improve for future efforts. It is envisaged that the findings and recommendations will feed into the preparation of the next phase of the Regional Programme, which is currently under development. The evaluation is funded by ADA.



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### 3. Situation Analysis

The Regional Programme was conceived in a context of demonstrable progress on *formal* anti-corruption laws and institutions but stagnation in the area of meaningful implementation and ongoing challenges to achieve deep embeddedness of the norms of transparency, accountability and integrity into public governance in the countries of the region. This situation analysis brings to the fore internal strengths and weaknesses and external opportunities and threats that may have had an impact on the Regional Programme's success. The Strengths - Weaknesses - Opportunities and Threats (SWOT) analysis is summarised in Figure 3 (p.10).

#### Internal Strengths and Weaknesses

Among the internal strengths likely to contribute to programme success were a close alignment of the Regional Programme's objectives with national anti-corruption priorities and strategies. This was enabled, on the RAI side, by the existence of an active Steering Committee of member country representatives who advocated for the national beneficiaries' needs from the outset of the programme design. The Regional Programme addresses a clear need by supporting national authorities and civil society organisations to strengthen their capacities in relation to anti-corruption measures and UNCAC.

Both organisations (RAI Secretariat and the UNODC CST) exhibit a committed and responsive staff pushing forward implementation of the Regional Programme and both organisations enjoy good relationships with beneficiaries and a broader set of stakeholders. This is reflected in the strong reputation of both organisations in the region. With its sole focus on the SEE region, RAI is well-regarded among national anti-corruption bodies and other institutions, as well as among associated stakeholders. This reputation is built on strong stakeholder relationships and long-standing quality in the methodologies and analysis produced over the years. The UNODC is also a well-respected professional organisation in the region, and is well-regarded for its international reach, its broad network of stakeholders including private sector companies and NGOs and the perceived ongoing relevance of UNCAC. UNODC's extensive experience in delivering capacity-building on UNCAC, which the CST has conducted since 2011, means trainings can be delivered efficiently and gives the potential to build on feedback from previous iterations to improve effectiveness. On the other hand, UNODC's long-established training approaches may hinder thinking of alternative training methods to freshen up the approach.

The Regional Programme's promise to combine capacity building of both public sector agencies and CSOs in the countries of the region, as well as its stated aim of strengthening work with the private sector, provides potential for rich and broad-ranging anti-corruption interventions covering the all-important triad of government, civil society and business. The strength of this promise is somewhat undermined by the fact that the programme is implemented by two distinct organisations with separate mandates and strategies which do not always cohere. In addition, the engagement of the private sector is a new area of work for UNODC while digitalisation of anti-corruptions is a new untested area of work for RAI.

Further internal weaknesses likely to affect the Regional Programme were staff turnover at the organisations and the lack of a medium to long-term strategy to support implementation of measures by government agencies and civil society beneficiaries. There is also a lack of clarity around the scope for independent advocacy by RAI, particularly because of its mandate as an inter-governmental body.

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## External Threats and Opportunities

The external context poses both threats and opportunities for the Regional Programme's successful implementation. Ongoing corruption, while an indicator of the programme's relevance, also can be considered a threat for the programme's meaningful implementation and impact. In Transparency International (TI)'s 2019 Corruption Perceptions Index (CPI), all of the programme countries received well below 50 points, with the best score being achieved by Montenegro (45). Apart from Montenegro, the countries of the region received between 32 and 39 points, which puts them between 91<sup>st</sup> and 120<sup>th</sup> place out of 180 countries. TI's analysis is that *"despite firm EU conditions on curbing corruption and ensuring institutions are free of political influence, many governments across the region fail to show true commitment to democracy and the rule of law"*.<sup>5</sup> The pace of formal and legal changes has not been matched by substantive change in practice and implementation. The risk of beneficiary institutions collapsing due to corruption-related issues is relatively high. Further, without political will at government level in the implementing countries, both sets of objectives around capacity-building of watchdog institutions and enabling of CSOs to contribute to the UNCAC review mechanism can be severely undermined.

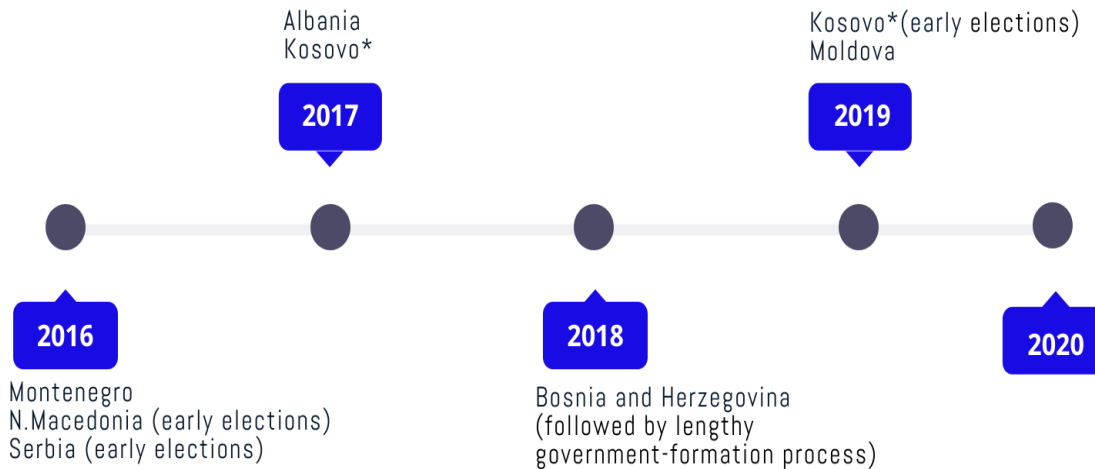
Corruption continues to undermine the functioning of the judiciary in the region, while the lack of independence of the judiciary in turn also slows down adequate processing of corruption cases.<sup>6</sup> There is a consistently poor track record of prosecuting and punishing corruption and organised crime, particularly among high-level officials.<sup>7</sup> This is attributed by experts in large part to political interference, inadequate institutional capacities, and lack of institutional cooperation. For example, a 2019 Organisation for Security and Cooperation in Europe (OSCE) report on the judiciary in BiH highlights the continued failure to prosecute 'big fry' and a focus on smaller cases, when it comes to corruption prosecution.<sup>8</sup> This again is a concerning indicator, as it highlights a lack of high-level political will which can in turn undermine meaningful implementation of the Regional Programme's objectives and creates disincentives for the private sector to engage in anti-corruption.

Despite the region's lauded progress in consolidating peace and stability,<sup>9</sup> the following trends are also relevant for the programme implementation: backsliding on democracy,<sup>10</sup> lack of independent media and press freedom<sup>11 12</sup>, variation in watchdog institutions' independence and capacities and, in some countries of the region, a shrinking of space for civil society.<sup>13</sup> All of this takes place against the backdrop of shifting expectations regarding prospective accession to the European Union (EU). While the prospect of enlargement can be seen to have spurred reforms, some interviewees also noted the risk of window-dressing, as national authorities seek to 'impress' the EU institutions and show outward signs of progress which are sometimes more superficial than substantive. Another key issue affecting the political and social context is the continued high level of emigration from the Western Balkans, particularly among young and educated citizens of the region, resulting in a brain drain phenomenon, which impacts on both civil society and institutional capacities in the beneficiary countries.

Civil unrest and protest movements emerged over the course of the programme, most recently in 2019 in Serbia, Montenegro and Albania. While the triggers for the protests varied across countries, a common thread was public dismay with ongoing corruption scandals and disillusionment with the slow pace of reforms. It is not clear whether these had an effect on Regional Programme's implementation but they highlight again the salience of the issues and put the beneficiary institutions under the media spotlight in several of the countries, raising expectations of delivery of meaningful anti-corruption reforms. In addition, there were several snap and early elections (see Figure 2) over the course of the programme's implementation which posed a threat to disrupt activities. Governmental changes and turnover of administration and personnel (and the concomitant loss of institutional knowledge and memory) posed a threat to smooth implementation. High turnover of staff among CSOs likewise represents a risk and, at the donor level, turnover of staff at

ADA led to numerous changes of project manager over the course of the Regional Programme which can hinder smooth implementation.

**Figure 2. Timeline of Legislative Elections over course of Regional Programme**



The Regional Programme has a stated cross-cutting aim of inclusiveness and gender mainstreaming across its activities. It is therefore important to understand the context in relation to gender relations and, in particular, the position of women in the region. According to a 2018 Report by the Friedrich Ebert Stiftung,<sup>14</sup> women are chronically underrepresented in virtually all facets of public life in SEE. Indeed, the available data (which itself is spotty and unreliable) indicates that women are underrepresented at most levels of decision-making, and have also not been sufficiently included in the peace-building processes in the region.<sup>15</sup> Throughout the Western Balkans, gender quotas do require political parties to include at least 30% women in their lists of candidates (40% in BiH and North Macedonia), but they are not always adhered to. Even if it seems that women in the region have more decision-making power and influence than ever before, as their representation in parliaments has grown, it has been noted that this does not automatically imply that gender equality and women's rights are promoted and defended, or that women have real power to improve the situation.<sup>16</sup> The democratic backsliding in the region also has implications for women's rights and the re-traditionalisation of gender roles. On a more positive note, women's representation in anti-corruption CSOs in the region is very high, including in senior decision-making roles.

The Regional Programme's success depends on institutions' and organisations' capacity to absorb the interventions at the national level. A risk to success is the variation in beneficiaries' capacities (for example, IT capacity). Mitigating this risk requires a high level of customisation of the interventions to local contexts. Further, after over two decades of interventions, there is a risk of over-saturation of anti-corruption measures, demands and ideas leading to 'anti-corruption fatigue', as well a competition for attention and resources from national institutions and civil society actors. The focus on EU enlargement in the region means a considerable amount of attention is paid to EU standard-setting, which at times seems to take attention away from UNCAC, although still an important standard-bearer in the region because of its global reach. A final external threat which emerged very late in the programme was the outbreak of COVID-19 pandemic. This global public health crisis led to the postponement of the planned signing ceremony in Vienna of Outcome 3 - International Treaty on Data Exchange - originally planned for March 2020.

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On a more positive note, North Macedonia signed a historic agreement with Greece in 2018, adding ‘North’ to its name and settling the longstanding dispute over the name (and associated history) of Macedonia. This has been heralded as a good example of regional cooperation and the consolidation of peace-building in the region. EU progress reports have highlighted other successes, particularly in strengthening relevant legal frameworks and setting up anti-corruption institutions in the region.<sup>17</sup> The prospect of EU membership remains a huge impetus towards reform in the area of anti-corruption and good governance. EU communiqués have consistently noted that the countries of the region have achieved ‘some level of preparedness in the fight against corruption’, however the issue remains one of the most pressing ones for the enlargement process. Among other opportunities in favour of the Regional Programme, are the broad buy-in from beneficiaries, the belief that the objectives are the right ones to work on and a general enthusiasm for digitalisation in the region, with which the Regional Programme’s objectives align nicely.



## SWOT Analysis For the RAI / UNODC Joint Regional Programme

### Internal

#### Strengths

- Committed and responsive staff at RAI and UNODC
- Good relationships with beneficiaries and broader set of stakeholders
- RAI and UNODC enjoy strong reputations in the region
- RAI known for relevant, quality research and analysis
- UNODC brings vast experience delivering quality UNCAC trainings globally
- Strong network: RAI and UNODC have ability to contract excellent external expertise to support implementation

#### Weaknesses

- RAI and UNODC have separate mandates and strategies which do not always cohere
- High staff turnover
- Implementation and follow-up plan for interventions under-developed
- UNODC's long-established training approaches may hinder thinking of alternative training methods
- Private sector new untested area of work for UNODC
- RAI mandate and scope for independent advocacy unclear

#### Opportunities

- Broad buy-in from beneficiaries
- alignment of objectives with a/c strategies in the region
- EU Enlargement impetus towards reform
- Enthusiasm for digitalisation of a/c in the region
- UNCAC seen as relevant in the region because of global reach
- Committed and experienced CSOs working on a/c in the region
- In some countries a growing willingness on the part of govt to work with CSOs

#### Threats

- Political will lacking in some countries
- Staff turnover at CSOs and Govt agencies
- Instability of some a/c institutions
- Variance in capacities of beneficiaries
- Political context in the region difficult
- Lack of willingness of Govt to involve CSOs meaningfully in UNCAC review process
- Donor project manager turnover
- Limits of UNCAC as an a/c mechanism

### External

Figure 3. Summary SWOT Analysis for Regional Programme

## 4. Evaluation Purpose, Methodology and Limitations

The evaluation methodology, approach, and research methods were agreed between the consultants, RAI and the UNODC Programme teams prior to the start of fieldwork and are described in detail in the inception report. This chapter provides a summary of the evaluation approach and methods used, while full information on the research methodology is included in Annex 3.

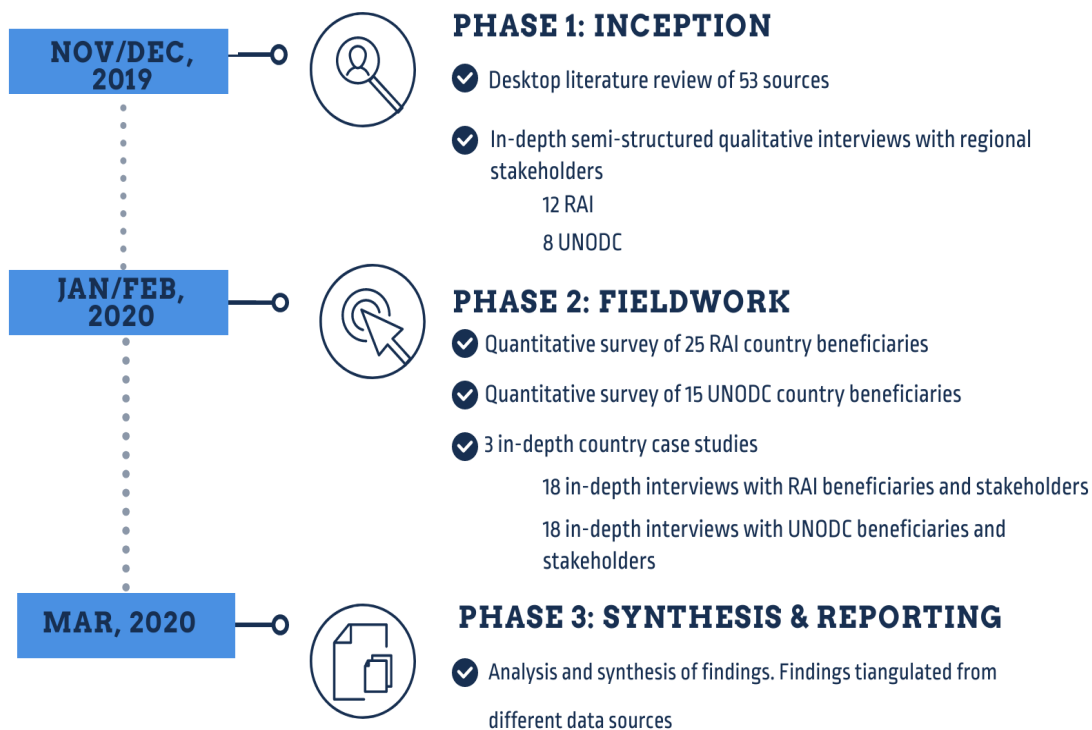
### Purpose and scope

The evaluation was asked to assess Regional Programme achievements in all of the following countries where it had been implemented: Albania, BiH, Kosovo\*, Moldova, Montenegro, North Macedonia and Serbia.<sup>18</sup> An in-depth focused review of three of the programme countries was conducted to develop a deeper understanding of project impacts, successes and challenges. The findings from the three in-depth field visits have been mainstreamed throughout this report in the findings chapter. The evaluation covers all activities conducted between the period of December 2015 until March 2020<sup>19</sup> and assesses the Regional Programme against the selected OECD DAC criteria of relevance, effectiveness and efficiency, as well as the cross-cutting theme of gender/social inclusion.

### Methodology

The research methodology and approach were designed to use mixed-methods across 3 phases to ensure both breadth and depth of findings from across the region where the programme was implemented. The stages of the research were planned to support an iterative approach to theory development with each phase informing the next phase of the research.

Figure 4. Graphic to summarise data collection phases and methods

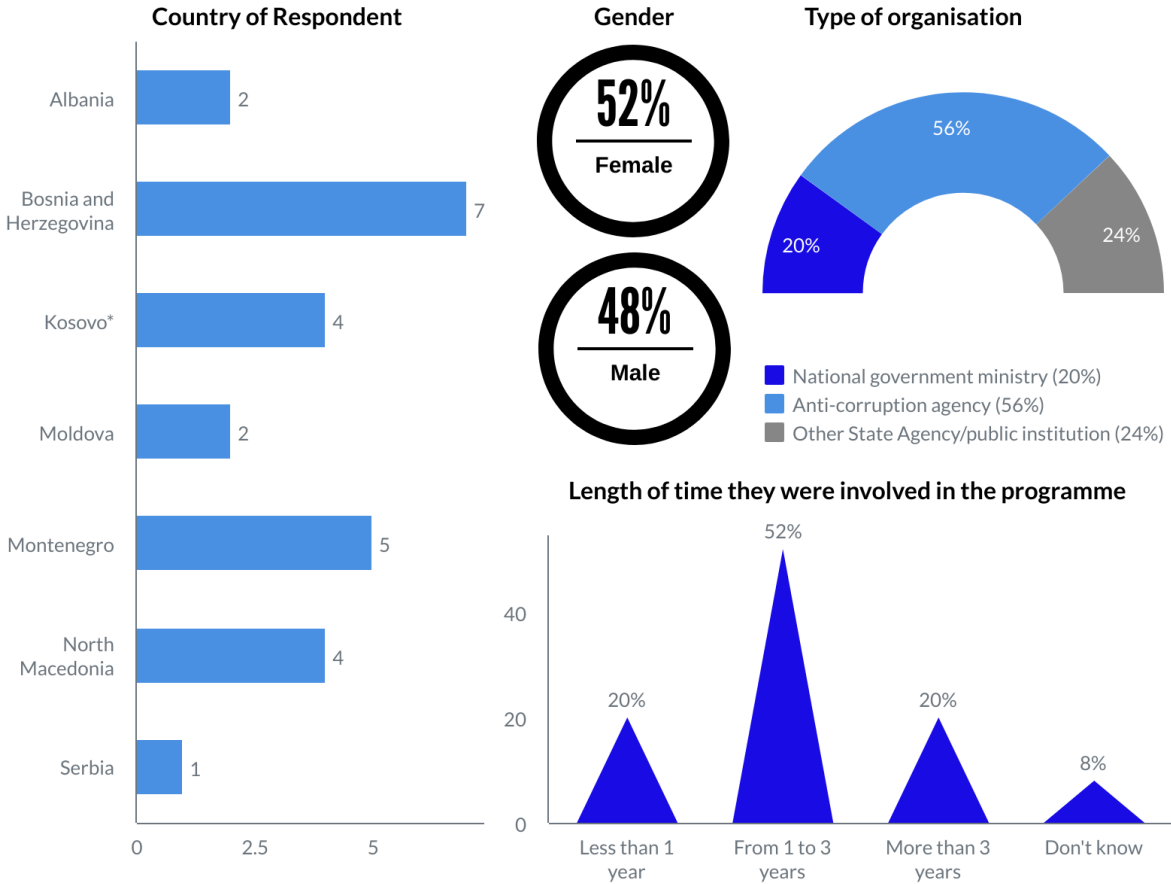


The first phase of the evaluation - the inception phase - involved a kick off meeting with the Regional Programme staff, a desk-top literature review of programme documentation, in-depth semi-structured qualitative interviews with key regional programme stakeholders (both in-person and via the telephone) and resulted in a detailed inception report

highlighting the planned research approach, methodology and an evaluation grid of key indicators. In total, during the inception phase, 20 in-depth semi-structured qualitative interviews were conducted with regional stakeholders (12 RAI stakeholders and 8 UNODC stakeholders), with 55% of the interviews conducted with female stakeholders and 45% male stakeholders.

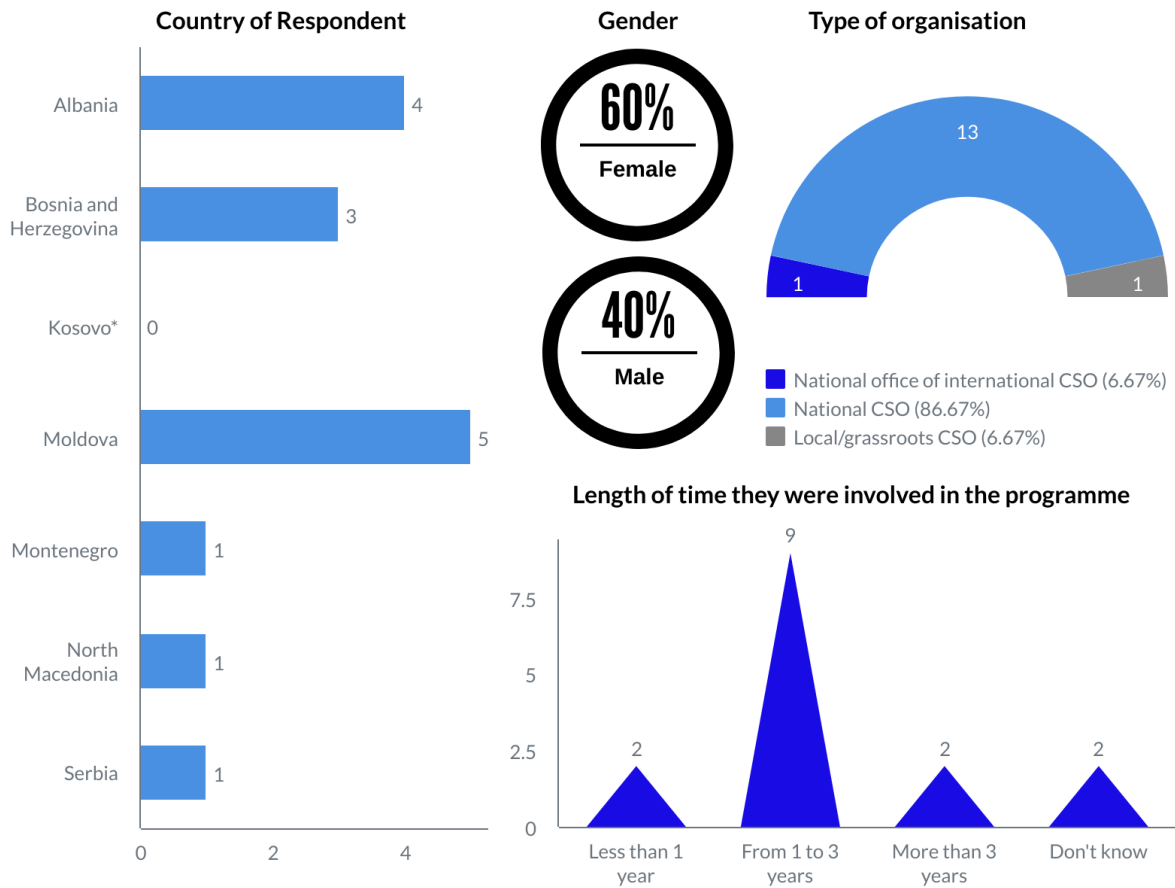
The second phase of the evaluation - the fieldwork phase - involved two online quantitative surveys, one of which was disseminated to all 47 RAI programme beneficiaries and the second survey which was disseminated to all all 73 UNODC programme beneficiaries. The survey of RAI beneficiaries collected a total of 25 responses between 24 January and 18 February 2020. The survey was conducted online. The overall response rate to the survey was 53%, which gives a robust coverage of Regional Programme beneficiaries. Responses were achieved from all programme countries, with multiple responses achieved from all but one country.

**Figure 5. Graphic to summarise profile of survey respondents for RAI beneficiary survey**



The survey of UNODC beneficiaries collected responses between 24 January and 02 March 2020. The survey was also conducted online with an overall response rate of 21%, which was lower than expected. Responses were achieved from all but one of the programme countries.

**Figure 6. Graphic to summarise profile of survey respondents for UNODC beneficiary survey**



In addition, three case study countries were selected for field visits in order to provide a holistic, in-depth understanding of project outcomes. The three countries (BiH, Montenegro and North Macedonia) were selected, after wide consultation with regional stakeholders throughout the inception phase, to reflect locations where the full range of programme activities were implemented so as to allow for more comprehensive learnings. In total, 36 people were interviewed via face-to-face in-depth semi-structured interviews across the three case study countries. Overall, 50% of the interviewees were female while 50% were male.

The final phase of the evaluation involved the synthesis of the findings from across the stages and methods, including secondary data analysis of monitoring survey results provided by the UNODC. The Regional Programme was evaluated against the project indicators (as detailed in Annex 1).

**Limitations of the research**

While the research approach was designed to provide both breadth and depth in its assessment of the Regional Programme, as with all evaluations, some limitations exist which should be duly noted when considering the findings:



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*Length of time since activities were implemented:* In some cases, a long period of time has passed since the beneficiaries and stakeholders were involved in the programme activities. Memory recall issues by interviewees/respondents will impact on the accuracy with which they can remember specific details.

*In-country beneficiaries and stakeholders being unavailable for interview:* While the overall achieved number of interviews per country was robust, some previously identified interviewees for specific objectives were unavailable to be interviewed. This impacts on the depth of findings which could be gathered during the field visits but was unavoidable due to the length of time since individuals were engaged in the Regional Programme.

*Limited number of external stakeholders interviewed:* For the in-country field visits, while the number of beneficiaries interviewed was robust, the number of potential *external stakeholder* interviewees involved in the RAI objectives was limited: 3 contacts were provided for BiH; 1 for Montenegro and none for North Macedonia (due to the Programme being on hold for some time after the collapse of the main beneficiary institution).<sup>20</sup> The evaluators were ultimately successful in securing only one RAI external stakeholder interviewee (in BiH), while others contacted were either unresponsive or unavailable, often because they had moved on from previous roles. The limited external perspective therefore makes it somewhat challenging to validate attribution. In order to compensate for this, it is important to note that some of RAI's external regional stakeholders provided detailed national-level insights which were used in the analysis. It should also be noted that the UNODC stakeholders interviewed from government and business had both an internal and an external role as they had attended events and workshops organized under the Programme. However, as these activities were targeted to build the capacity of CSOs, these attendees have been classed as stakeholders for the purpose of this evaluation.

*Low response rate to the UNODC CSO beneficiary survey:* The UNODC survey of beneficiaries achieved a low response rate, meaning that the findings from that survey should be considered indicative but not necessarily representative of views of all beneficiaries engaged in the Regional Programme. In addition, no responses were achieved from Kosovo\* meaning this evaluation was unable to assess UNODC programme achievements using primary methods in this location. However, given that Kosovo\* is not a signatory to UNCAC due to its special status, this does not pose a significant limitation of the research considering the UNODC programme outcomes were targeted towards improving capacity to engage in the UNCAC review process.

*Greater inclusion of low engagement countries' perspectives in the evaluation:* The three case study countries selected for field visits were chosen to provide a holistic, in-depth understanding of all six project outcomes, allowing the consultants to gain a detailed understanding of the extent to which each of the objectives was achieved over the course of the Regional Programme. While the initial proposal from the evaluators was to include a field visit to a country where low-engagement or limited evidence of outcomes were found, ultimately the inclusion of a 'least successful' case was not possible, due to limitations in the number of countries that the evaluators could travel to under the evaluation budget. Such 'low engagement' countries may have had alternative perspectives on the results of the Regional Programme. To compensate for this, however, the evaluation surveys targeted beneficiaries in all Programme countries and responses from RAI beneficiaries covered all Programme countries, while the UNODC respondents covered all countries with the exception of Kosovo\*.

*Survey limited in length:* To encourage wide participation, the survey length was limited to a total maximum completion time of approximately 15 minutes which limited the number of questions which could be included. Therefore, the survey focused predominantly on the key evaluation indicators, and space for open ended questions was limited.

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## 5. Evaluation Findings

In this chapter, the evaluation findings are presented in detail, structured according to the evaluation criteria and questions (see Annex 9).

### **Relevance**

**The Regional Programme addresses a clear need by supporting national anti-corruption institutions and CSOs to strengthen their capacities in relation to anti-corruption measures and, for CSOs, specifically in relation to UNCAC. This responds to consistent evidence and messaging from the international community (e.g. EU, OECD, OSCE, USAID)<sup>21</sup> that, despite the strengthening of relevant legal frameworks and anti-corruption institutions in the region, systemic corruption continues to permeate the countries of SEE and an implementation gap prevails. The OECD has noted in particular the need for the governments of the region to co-operate more effectively with CSOs on anti-corruption issues.<sup>22</sup>**

### **How well was the Regional Programme designed to adjust to changing circumstances in SEE over its lifetime?**

The design of the RAI Outcomes (1-3) built in a certain degree of flexibility to allow for adaptation to changing circumstances over the Regional Programme's lifetime. In BiH, for example, the originally planned beneficiary for Outcomes 1 and 2 was solely the Anti-corruption Agency (APIK). However, during the initial phases of implementation of Outcome 1, it became clear that the High Judicial and Prosecutorial Council (HJPC) was an interested and willing potential beneficiary for the IT solution for CRA. As a result, RAI adapted their plan allowing HJPC to come on board as an additional beneficiary. An interviewee in BiH commented that *"it was impressive to see how uncomplicated and straightforward it was for RAI to bring on board this institution, who have high IT capacities and were very keen to be part of the activities. Other organisations would probably have avoided this because of the hassle of making such a change but for RAI, they thought, 'they are a good partner, let's get them on board'"*. Likewise, in North Macedonia, the unusual circumstances of the Ministry of Finance being in charge of CRA, unlike all other SEE countries, were adapted to by RAI. They tailored the activities to the unforeseen institutional setup, having the CRA experts assess the CRA system currently in place, providing analysis of its shortcomings (in particular its heavy focus on financial risks) and recommendations for setting up a more comprehensive institutional framework for CRA.

Regarding Outcome 3, the International Treaty on Data Exchange, this was perhaps the most ambitious element of the Regional Programme and required some adaptations over the course of the implementation. The design of the Regional Programme allowed for exploration of various modalities in terms of what form the agreement would take (e.g. bilateral agreements, multilateral agreement). The inclusion of Bulgaria (an EU member state and also a member state of RAI) initially boosted the perceived potential of the instrument to become more than a regional treaty, but rather a truly *international* one, as it was considered a possibility that the EU could sign 'en masse'. The Treaty was initially supported by the EU through endorsement by the Directorate-General for European Neighbourhood Policy and Enlargement Negotiations (DG NEAR) and mentioned in the 2018 Communication on EU Enlargement Policy from April 2018, as well within the Berlin Process through Trieste and London Western Balkan Summits in 2017 and 2018. However, at a late stage of the implementation, the European Commission addressed an official legal opinion questioning the possibility of EU Member States (and hence, Bulgaria) to sign the Treaty since, they argued, the Treaty falls under Community competence, rather than a national competence. This issue is ongoing but it is a credit to the Regional Programme team that this political conversation was not allowed to derail the negotiations and that a final text was agreed and was ready to be signed at the time of this evaluation.

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There were several institutional changes that took place that the Regional Programme was less well able to adjust to, although these were beyond the control of RAI. One such example was a change of government and the subsequent dissolution of North Macedonia's State Commission for Prevention of Corruption (SCPC) in 2017. This beneficiary institution started out as one of the leading beneficiaries in the Regional Programme showing a readiness and commitment to implementation, particularly in the field of CPL. However, in 2017, 1 year into the Regional Programme, the SCPC was at the centre of a scandal involving travel expenses leading most of the members of the Commission to resign. For almost 2 years the SCPC became inactive and only resumed its operations at the end of 2018/beginning of 2019. This had a major impact on Outcomes 1 and 2 in the country as much time was lost and ultimately could not be recouped and therefore it was decided not to fully pursue Outcomes 1 and 2, as had been originally foreseen. In particular it meant dropping the implementation of the IT solutions in the country. A former RAI staffer said *"we had foreseen this risk, of course, it's an obvious risk and we thought we could keep advocating for the government to continue with CPL, and we did try to persuade them to leave the staff in the CPL unit in place, but at the end of the day, nothing helped and most of the staff we had trained had to leave."* In Albania, in 2016, the Ministry for Local Issues (at that point acting as National anti-corruption focal point) would have been the target for RAI's Outcome 2 but they were already in the process of developing a national CPL methodology with a local NGO. This Ministry was eventually disbanded and so there was no longer a clear focal point for RAI to engage with on CPL. Such institutional changes are common in the region and for future programming, RAI should consider more proactive engagement at the political level (particularly when there is a change of government) to mitigate against the risks of loss of institutional memory and capacity when change inevitably occurs.

The design of the UNODC Regional Programme objectives also allowed for a certain degree of flexibility during implementation to respond to changing circumstances in the region and within the programme countries. For the delivery of the workshops and training events, the UNODC allowed the decision of which countries the events would be held in to be revised based on the changing level of interest and engagement from programme countries' governments. This resulted in moving the location of a planned workshop from Albania to Belgrade as a result of limited levels of engagement from the government of Albania. While holding events in a country may encourage greater engagement from a partner country, when this does not occur during the planning stage of the events, moving locations is a preferred choice where possible to improve optics of the events and help garner momentum from all attendees present. Despite the initial disinterest from the government of Albania, more recently they have shown interest in engaging CSOs in the review process which has been responded to by UNODC, suggesting a responsiveness of the programme team to remain flexible to changing contexts in the region

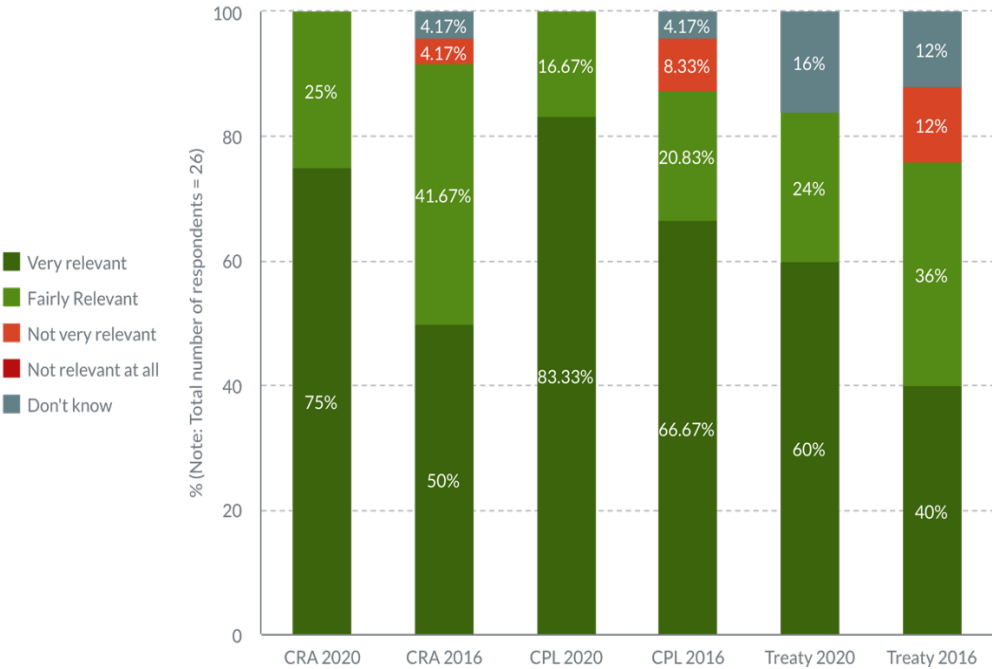
Regarding workshops and trainings under Outcomes 4 and 5 of this Regional Programme, the team also demonstrated flexibility in design as decision-making over content was shared with a project partner, the UNCAC Coalition. The UNCAC Coalition is a network organisation comprising more than 350 CSOs in over 100 countries whose mandate is to support civil society when engaging in the UNCAC review processes for their country. Due to their direct closeness with CSOs in the region, involving this partner in the design of content of the workshops and trainings allows for adaptation to reflect salient or emerging corruption issues, respond to needs from the coalitions members and allows the Regional Programme to be responsive to changing circumstances. As an interviewee from the UNCAC Coalition said about their involvement in the trainings, *"we provided suggestions on the participants to UNODC, we developed the agenda together with the UNODC, we have a specific last day of the workshop. It is organised only by the UNCAC Coalition for civil society. So it is 'by civil society, for civil society' which we find very useful"*. The UNODC content at the workshops was designed to increase knowledge on UNCAC, review processes and procedures, and therefore did not require a great amount of flexibility, as all countries had completed the 1st cycle of the UNCAC review and were due to start the 2nd cycle from Nov 2015, just prior to when the Regional Programme began. The 2nd cycle covers the Convention chapters on Preventive Measures and Asset Recovery,

for which relevant content was provided during the trainings. Future workshops will need to consider adaptation of content for those countries which have completed the 2nd cycle to make them applicable for the implementation of the recommendations stemming from those reviews.

**To what extent are the objectives of the Programme in line with the national strategies and priorities?**

The active involvement of the RAI Steering Committee allowed for a needs-based approach and close alignment of the RAI activities with national anti-corruption priorities. According to a former RAI Secretariat staffer, “particularly Outcomes 1 and 2 were inspired by and anchored in the anti-corruption strategies and action plans of the member states”. They were also building on previous analyses and particularly on the development by RAI of 2 detailed regional-specific and high-quality methodologies on CRA mechanisms and CPL. The design of the RAI side of the Regional Programme allowed for countries to choose which Outcomes were most relevant for them, which in itself ensured a high degree of alignment between the activities and the national strategies and action plans. All 3 RAI outcomes are evaluated by RAI beneficiaries as either ‘very relevant’ or ‘fairly relevant’ and they are perceived as even more relevant now, as the programme comes to an end, than they were in 2016. It is notable that 100% of respondents to our survey (which 25 RAI beneficiaries completed) see CRA and CPL as ‘very or fairly relevant’ in 2020 (up from 92% and 87% in 2016). 84% of beneficiaries saw the International Treaty (Outcome 3) as either ‘very relevant’ or ‘fairly relevant’ (with the remaining 16% choosing ‘don’t know’). 12% of respondents thought in 2016 that the Treaty was not very relevant but this had dropped to 0% in 2020.

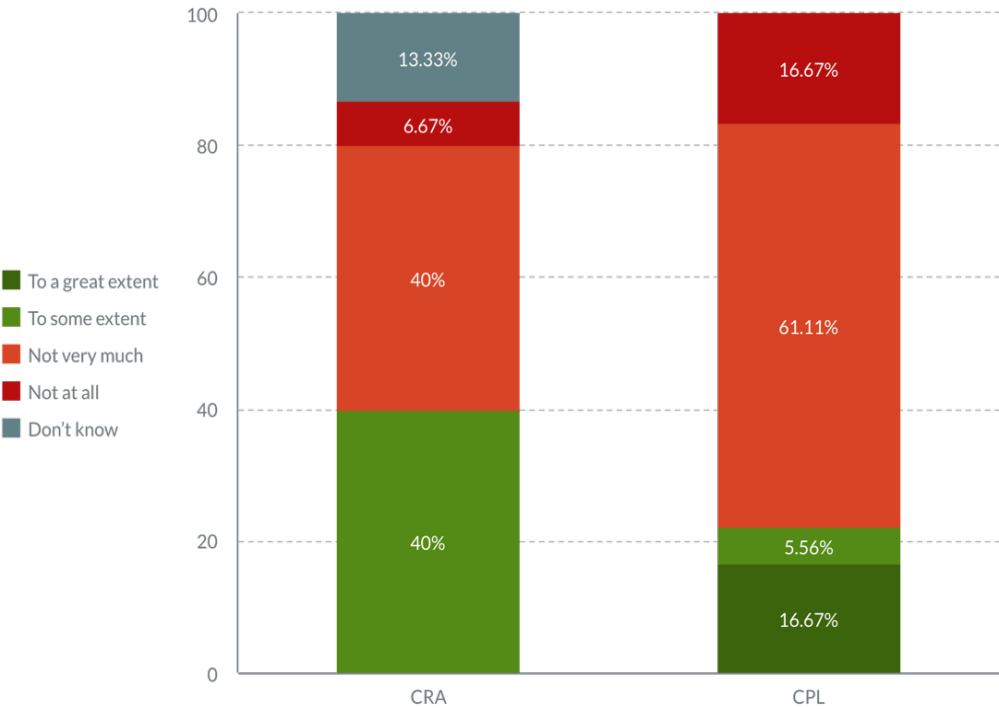
**Figure 7. Graph showing attitudes to how relevant RAI objectives in the SEE region were in 2016 and in 2020<sup>23</sup>**



CRA, known in some countries more colloquially as ‘Integrity Plans’, had already been on the regional radar some time before the Regional Programme began and some 40% of RAI beneficiaries who responded to our survey reported that their countries were already implementing CRA ‘to some extent’ in 2016. A respondent from one of RAI’s beneficiary institutions stated that “we already had rolled out integrity plans and the idea of the CRA IT solution responded to our need for faster, better and more consistent management of Integrity Plans, so that the implementing institutions could manage the plans

and analysis of them much more effectively”. Another beneficiary respondent in BiH stated that “we already had some activities with integrity plans and the RAI Programme helped us take a step forward towards digitalisation of this process. It will make it much easier to create and monitor the integrity plans and also enable better communication across implementing agencies”. The level of experience with CRA varied across the region with some countries (e.g. BiH, Montenegro, North Macedonia, Serbia) having institutionalised CRA already within the public sector and therefore the training and capacity building needs varied but were tailored to each country's context. Likewise, CPL experience varied, although in general it was more novel for countries and the majority had no previous experience implementing CPL. Just over 20% of our RAI Beneficiary survey respondents reported that CPL was already being implemented in their country in 2016. An outlier to this trend was Moldova who had been implementing CPL for over 10 years. The Regional Programme succeeded in adjusting activities to allow for pitching of trainings and capacity building at the right level for each country context and capitalised on Moldova’s deep experience to encourage regional knowledge sharing.

**Figure 8. Graph showing prior experience in Programme countries with CRA and CPL<sup>24</sup>**

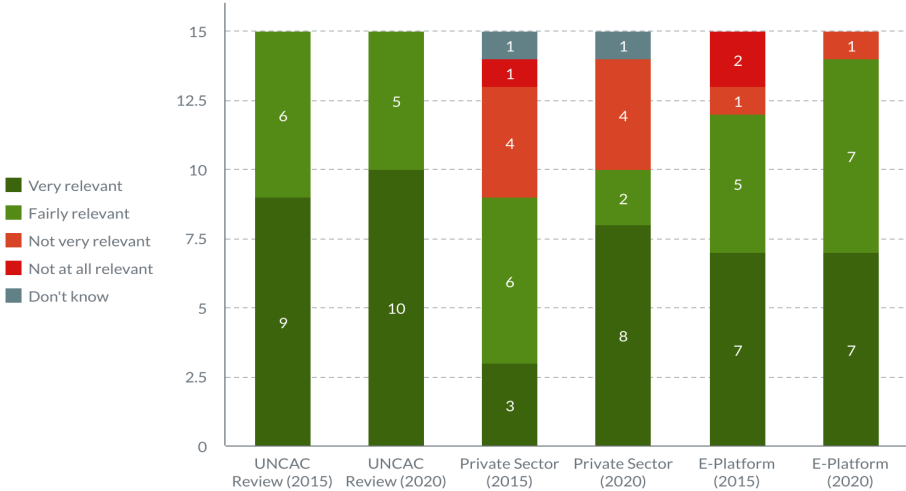


Outcome 3, the International Treaty on Data Exchange, was included in the Regional Programme as it responded to a growing need, evident both in the literature and directly expressed to RAI by several national oversight bodies. They indicated there was a data gap: while there was clear evidence that political actors were hiding assets primarily in property overseas, there was little cross-border sharing of information regarding these hidden assets. According to both regional and national stakeholders, there was some initial skepticism from several beneficiaries regarding the relevance and feasibility of the International Treaty. A beneficiary from North Macedonia shared that “the initial concern was that this effort might be duplicating mechanisms because some bilateral agreements and practices on data exchange are already in place. The experts took great efforts to delineate what this Treaty is and how it doesn’t interfere with international cooperation as it is done in the traditional sense and they brought people on board that way”. Several national beneficiary respondents involved in the Outcome 3 noted the relevance of the international rather than regional dimension of the Data Exchange Treaty in order for it to reach its full potential.

The ambitions of the UNODC in the SEE region via this Regional Programme were also seen as highly relevant for the programme countries. The prevalence of corruption and addressing corruption challenges were noted during all interviews as a key issue to be working on. To quote one CSO beneficiary from North Macedonia, when asked whether they thought the topic of the UNODC’s work under this programme was relevant: *“Of course, yes, firstly not just for Macedonia, but Western Balkans countries and other countries even EU countries which come from that in the region. It is actually one of the main issues here which we should be working on, we as countries but also the international community in investing and building capacities it is much needed... Because even in Macedonia with the change of government, no matter how much better this government is, corruption is still very much a prevailing issue.”* Interviewees noted various economic, political and social outcomes which were hampered by corruption.

UNCAC was seen as a useful process for engaging in anti-corruption, as the convention is broad and comprehensive it allows for relevant advocacy opportunities for the variety of corruption challenges which a country might be facing and is responsive to the various strategic priorities of the participating CSOs. This was also reflected in the survey results of CSOs who had engaged in the programme, which found that all CSOs surveyed said that knowledge of UNCAC was either very relevant (7) or fairly relevant (8) for their work. None of the CSOs reported that this knowledge was not relevant for them. As national governments have already signed on to UNCAC, CSOs mentioned that this gave them greater leverage to call for changes, as the governments had already committed to addressing these problems via the convention. As one interviewee noted from North Macedonia, *“UNCAC offers civil society to hold government to these standards. The review process gives them a foot in the door, a spotlight on the country and government about how they are handling the process... At the global level they will feel the pressure to do that right and [it] gives civil society more standing. It’s in the convention, they committed, they signed up to it...CSOs can put pressure both on governments and UNODC, transparency and participation in the process.”* Building capacity of CSOs can help mobilise advocacy efforts during the review process and build momentum for an inclusive and accountable review, which had particular relevance in SEE given this was the first time the trainings were offered in this region. The importance of CSO involvement in the review process was a viewpoint echoed by a regional stakeholder who said *“we believe if there is no civil society involvement and there is no pressure to government to make the process transparent and inclusive, we cannot maximise the potential impact of the convention and the convention cannot become the engine of reform that we think it can be.”*

**Figure 9. Graph to show attitudes to how relevant UNODC objectives in the SEE region were in 2015 and in 2020<sup>25</sup>**



For Outcome 4, the UNODC’s work was seen as having high relevance for CSOs in the region. This area involved capacity building of civil society to better engage in the UNCAC review processes. This was noted by interviewees as important as CSOs may lack knowledge of what UNCAC is and how it can be relevant for them. The importance of CSO involvement in the review process was a view point echoed by a regional stakeholder who said *"we believe if there is no civil society involvement and there is no pressure to government to make the process transparent and inclusive, we cannot maximise the potential impact of the convention and the convention cannot become the engine of reform that we think it can be."* Given the broad and encompassing nature of UNCAC, it can have relevance even for CSOs who are not working on anti-corruption. Engaging a range of CSOs was supported, for example, by a Government Stakeholder from North Macedonia, who said *"we have more CSOs who are more specialised in public procurement... security, defence, and they can use UNCAC and they can call upon the provisions of the convention and request more from the government to improve implementation of the convention because it is directly applicable."* One CSO beneficiary who does not directly work on corruption, reported that they had been able to incorporate information about UNCAC into the trainings which their CSO delivers to citizens in the country. The trainings remain relevant even for those CSOs who had previously engaged in earlier rounds of the review process as, due to staff turnover, organisations may have since lost that institutional knowledge. For some CSOs interviewed, they had not been involved in the UNCAC reviews before, the trainings equipped them with new knowledge allowing them to properly engage in the process, be aware of at what stages they can provide their recommendations and therefore contribute to a more inclusive review process. The survey of CSOs who were engaged in the Regional Programme found that all respondents thought that building capacity of CSOs to engage in the UNCAC national reviews was either very or fairly relevant for their own national priority to fighting corruption. When asked about whether this remains relevant for them today, all agreed.

**Figure 10. Table to show current review status of all SEE Programme countries in the UNCAC Review Process<sup>26</sup>**

	 Country Visit?	 Country Report	 Other Stakeholders involved
<b>Albania</b> Second Cycle Review, Year 1	-	-	-
<b>Bosnia and Herzegovina</b> Second Cycle Review, Year 1	3-5 Oct 2017	Yes - Full Report	✓
<b>Kosovo*</b> -			
<b>Moldova</b> Second Cycle Review, Year 1	-	-	-
<b>Montenegro</b> Second Cycle Review, Year 4	-	-	-
<b>North Macedonia</b> Second Cycle Review, Year 2	15-18 May 2018	Executive Summary	✓
<b>Serbia</b> Second Cycle Review, Year 5	-	-	-

For the work around Outcome 5, building the capacity of CSOs to partner with the private sector around UNCAC and anti-corruption activities, a majority of CSOs in the survey also thought this was relevant for their own national strategy, although to a lesser extent. From the survey of CSO beneficiaries, 10 of the respondents thought it was either very or fairly relevant while 4 thought it was not relevant. Involving the private sector in anti-corruption work was generally seen as relevant by interviewees as they are a key stakeholder and are often the victims of corruption. The private sector is often

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unaware of UNCAC and how useful it can be for their work - issues that the private sector found of particular relevance include public procurement, transparency of public spending and corruption in the judiciary.

The relevance of this area of work, was noted by a number of interviewees as being limited by the high levels of corruption in the government which creates significant barriers to companies wishing to engage in anti-corruption work. The government in these countries often disperse large funds via procurement contracts, which can dis-incentivise individual companies to criticise the government. It was noted that, without political will and strong public sector anticorruption agencies, actions by individual companies will have very little impact. As mentioned by one business sector stakeholder *“a strong and firm independent authority [Anticorruption agency] is needed before anything else, and then, such independent authority should be inclusive as much as it can to involve civil society and private sector, that is a precondition before anything else.”* Engaging chambers of commerce, employers’ associations and business associations - which this programme did, along with inviting individual companies - was seen as a preferred option as they have greater freedom to speak out and also, they already engage in improving standards among the companies they represent. It is noteworthy that, when asked about how relevant building capacity of CSOs to work with the private sector is for their own organisation’s strategy now in 2020, 8 CSO survey respondents said that it was very relevant for them, up from just 3 who said the same about their organisation’s strategic priorities in 2015. This suggests a growing momentum and importance for this area of work in the region at this present time or suggests that the programme itself helped demonstrate to CSOs why this is strategically important for them.

The ambitions of the UNODC to improve networking via the Regional Programme were very well received. 14 out of the 15 respondents reported relevance of the E-Platform for their own national strategies now in 2020. The same levels of relevance were also found for UNODC work on improving engagement by CSO with their government on anti-corruption, and increasing participation in intergovernmental meetings for their own national approaches. Interviewees noted that the workshops and trainings were particularly relevant for them to attend as they allowed networking between focal points, CSOs and the private sector. This gave participants the opportunity to meet relevant actors within their own country, hear how the process of revision works elsewhere, share contact information and give visibility to smaller CSOs for the process.

*“The review process itself gives an occasion or foot in the door for civil society to interact and have a legitimate reason to have contact with their government representatives. Often it is hard for civil society grounds to find out who their focal point is, and when they find out they can never get a meeting. And then they are sitting in a room with them for a couple of days... and it does to some extent work in the room, but we have some circumstantial evidence that it doesn’t seem to have a lasting effect.” UNODC Regional Stakeholder*

The relevance of the UNODC elements of the Regional Programme is found to improve in countries when national governments are more willing to engage with civil society and the private sector. As the UNCAC review processes do not require, but only recommends, involving civil society, political will and buy-in is required to ensure that trained CSOs are able to provide input into the country check-lists and during the country visits. In North Macedonia, for the first review cycle, CSOs noted that the process was closed and the government did not want to engage with civil society. However, since the technical government has been in place, there has been greater willingness on the part of the public sector to engage CSOs, with CSOs asked to comment on draft laws and the new national anti-corruption strategy includes a rhetorical commitment to include civil society and the private sector more deeply in anti-corruption. As a Government Stakeholder from the country said *“[The UNODC Trainings/Workshops] I think these were excellent - excellent activities. These were things I had to discuss a bit more with our Minister back then, whether we should support activities for civil society*



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organisations and how we finally accepted that because we had to do it, but we cannot do it because we do not have enough resources to cover civil society. And this [the UNODC Trainings] came just right, to have a regional programme to work with civil society organisations to understand the UNCAC and how the review implementation works - that was excellent and I hope that UNODC continues working with Civil Society Organisations.” In BiH, a CSO also reported increased willingness by their government to engage CSOs in the UNCAC process - which they attributed in part due to engagement in this Regional Programme. In North Macedonia, there have also been small changes including greater use of e-government and more donors requesting involvement of the private sector in projects, which increases the relevance of this Regional Programme in the country.

The relevance of UNCAC in the region was questioned by some interviewees during the evaluation research. Some noted that the legislation in the countries is already generally sufficient but it is the implementation of the legislation which is lacking. UNCAC was said to be less effective at putting pressure on governments to implement recommendations compared with other vehicles, notably GRECO, for which the possibility of EU membership is a motivating factor for governments to improve. As noted by one CSO interviewee from North Macedonia: “UNCAC is not so relevant for the government, but GRECO more so - UNCAC, when they give them recommendations and revision, what the countries should do, there is no process for reviewing and in what manner it is implemented by the countries. There is no penalty for no progress. GRECO is a must - EU reports [are] higher on the agenda.” The continued relevance of UNCAC after the completion of the 2nd review cycle will be influenced by how effective and robust the follow-up procedures are. The follow-up procedures have yet to be agreed.<sup>27</sup>

### **Did the Partners understand the context and pre-conditions that would have ensured that the change is sustainable and long-term?**

In general, both organisations are well-anchored in the region and display acute awareness of the regional context. RAI, as an intergovernmental organisation with a sole focus on the region, displays a deep understanding of the context in which its beneficiaries operate. The RAI Steering Committee also provides a direct link to the member country ministries, which keeps RAI’s finger on the pulse of beneficiary institutions’ varying and changing circumstances.

One area where RAI’s understanding of the pre-conditions for sustainable and long-term change could have been improved was in the activities related to creating IT solutions for CRA and CPL (Outcomes 1 and 2). RAI somewhat underestimated the degree of variance of beneficiaries’ needs (even across institutions within the same jurisdiction), and the importance of investing significant time upfront to understand the specific institutions’ needs in order to build appropriate and user-friendly specifications.<sup>28</sup>

Regarding Outcome 3, the International Treaty, targeted and extensive advocacy is needed to ensure this Treaty is extended beyond the region and picked up internationally to ensure its long-term success and usefulness. The focus by RAI to date has understandably been on negotiating and signing of the Treaty. Interviews with RAI Secretariat staff indicated that in the longer term they do, however, perceive this as more than a ‘regional’ Treaty. In order to ensure that the Outcome was achieved, RAI focused their efforts on getting the Treaty text agreed regionally, in the first instance, thereby creating a product which is anchored in the region and a symbol of regional commitment. Once achieved, RAI sees the extension of the Treaty beyond the region as a natural progression. To quote a RAI Secretariat staffer, ‘we wanted to have a regional product, with regional ownership and commitment, in order to avoid again some mechanisms to be pushed from the above from internationals. That is why the Treaty should remain a regional one at this stage, prior to extending it further within the next Programme’.

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The delays in the process of negotiating the Treaty did not allow RAI to move far beyond this first ‘regional stage’ over the duration of the Programme. RAI’s plan to have the signing ceremony hosted by an EU member state (in Vienna, Austria) indicates their awareness of the importance of the optics and of sending a message that it has a relevance beyond the immediate SEE region. RAI representatives did additionally promote the Treaty at some 35 regional and international events over the course of the Programme targeting, amongst others, EU institutions, OECD and the UK Parliament. National beneficiaries and regional stakeholders interviewed for this evaluation were not particularly aware of this high-level advocacy, however, and several of them expressed some concern that RAI may not have been proactive enough in externally promoting the Treaty as a truly international instrument and ‘selling’ it to the international community. One learning from this area of work is the need for more extensive communication efforts (including for example, more social media outreach) on the part of RAI, which could have ensured greater national and regional stakeholders’ awareness of outreach and successes with regard to the Treaty.

The UNODC project team did to a certain extent understand the context and pre-conditions for sustainable change. The capacity building of CSOs on UNCAC utilises an established training system which has been tested and implemented in other regions since 2011 by the UNODC CST, and continues an existing partnership with the UNCAC Coalition whose mandate is established on this topic. The Regional Programme offered a networking opportunity to CSOs and governmental experts/focal points which also helped address a major barrier which CSOs face during the UNCAC review processes in getting contact with the focal points - something which previously prevented long-term sustainable change. However, the programme logical framework contained limited details on how the programme would address other barriers to CSOs engaging on the UNCAC review including lack of staffing, funding, and resources as well as lack of political will or capacity of the focal points to engage with the CSOs after the training events. The introduction of engagement opportunities between CSOs and the private sector is consistent with wider anti-corruption theory and approaches which support involving this important stakeholder in dialogue. However, in the SEE region specifically, engaging the private sector in anti-corruption is still in the very early stages and given the corruption challenges which exist in the region, there are very high barriers to private sector engaging in this work. Mechanisms to respond to this were somewhat lacking in the pre-programme plans.

### **Was the programme design coherent and the pathways for impact (theory of change) well-articulated?**

Each of the individual RAI objectives has its own internal logic and coherence which is rather well articulated and understood by the beneficiaries and involved stakeholders. The CRA (Outcome 1) mechanism is understood as a mechanism to compel government officials and appropriate governmental bodies to move away from discretionary decision-making to rule-based political and administrative decision-making. Meanwhile CPL (Outcome 2) is understood as a mechanism to detect and minimize the risk of future corruption that draft or enacted rules could facilitate. The International Treaty on Data Exchange (Outcome 3) is articulated as a tool to allow for the exchange of data internationally and to ultimately allow domestic integrity institutions to more thoroughly verify the veracity of asset declarations of their national officials. So, all three tools are designed to boost the capacities of state institutions to carry out their anti-corruption activities more effectively,

There were however omissions and room for improvement in the logical framework and programme design. For both Outcomes 1 and 2, follow-up monitoring of implementation and impact of the mechanisms is lacking. For CRA, there is little mention of what needs to be done to address and mitigate the risks identified through the CRA mechanism and how this can be monitored by agencies. For some, there is the risk of this becoming a box-ticking exercise if monitoring of responses to identified risks are not built into the activities. Likewise, for CPL, there is little impact monitoring of how many draft or already enacted laws were changed in line with opinions issued using the CPL methodology. For Outcome 3, RAI’s

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initial focus on *regional* rather than *international* cooperation on data exchange can be seen as a purposeful, staged approach to ensure regional ownership of the Treaty and the avoidance of another ‘top-down’ initiative from the international community. Notwithstanding this approach, given that the success of the tool depends on it being internationally implemented, the Programme could have included a more clearly-articulated regional and international advocacy plan as an additional output.

Further, how the 3 Outcomes collectively combine to form a theory and pathways of change was not particularly well-articulated in the Regional Programme documents and neither is it fully understood by the beneficiaries. This is understandable given that, in some countries, several distinct beneficiary institutions were involved and often only working on one singular Outcome. However, it would certainly be more conducive to sustaining long-term change if these national institutions were linked up and provided with a fuller picture of how all Outcomes combine to produce a broader change. Awareness varied across the beneficiaries spoken to during the field visits with some (e.g. Montenegro) having a fairly centralised anti-corruption agency and an awareness of how the various activities tie together. Others, in BiH and North Macedonia, indicated primary concern with the (mostly) singular outcome with which they were involved, and did not have a sense of how this fit into a broader theory of change and pathways of impact. The regional stakeholders were somewhat more aware, but even those stakeholders involved in the programme design spoke mostly of each Outcome’s individual relevance and were generally not in a position to articulate the broader theory of change of the Regional Programme. Even in countries only implementing one Outcome, it would be beneficial for them to have a better overall picture of RAI’s theory of change and how various pieces of the puzzle fit together.

This was even more pronounced when considering how the 3 RAI Outcomes are combined with the 3 UNODC Outcomes. A former RAI staffer indicated that “*combining both the state-side (RAI) with civil society (UNODC) was a great opportunity for us, as it allowed us to combine top-down and bottom-up pressure for anti-corruption reform*”. In theory the combining of the two halves of the Regional Programme would allow pathways for change at a level that the sum of the parts could not. This narrative of the added value of the combined state and civil society actor approach as a winning combination was articulated only by internal stakeholders but does not appear to have been communicated clearly to the external beneficiaries and stakeholders. It did not emerge from the case study visits to beneficiaries and national stakeholders. The implementation also did not live up to the promise of this opportunity to create a programme that is more than the sum of its parts.<sup>29</sup> A further point to note is that the risks logged in the logframe were all relevant, including political instability and lack of political will. Risk mitigation strategies were however not well-articulated and a future Programme design should invest more time and energy in identifying mitigation strategies in advance of implementation.

The overall logic in the UNODC programme design was to build the capacity of CSOs in the region to prevent and fight corruption by improving their understanding of UNCAC and contribute to the review process via trainings and engagement with multiple stakeholders. Outcome 4 contributes clearly and logically to the overall goal of the Regional Programme by capacity building CSOs on UNCAC. It was noted by a number of beneficiaries and stakeholders that CSOs in the region lack knowledge of UNCAC and that once gaining an understanding of the convention, they could clearly see how UNCAC was useful and relevant for anti-corruption in the region. Less clearly explained by the logical framework was the contribution of the CSO-delivered in-country trainings for the national UNCAC review processes, why it is preferred that these are delivered by CSOs in-country and not UNODC, how this contributes to the overall ambition of the programme of work, nor how the programme would address the barriers for CSOs to implement these trainings given no funding was provided. While lack of CSO capacity to conduct in-country trainings was noted as a risk in the programme plans, the mitigation measures did not seem sufficient to ensure this area was achieved across all countries and unfortunately monitoring and reporting indicators did not ask for UNODC trained CSOs to collect data on whether the subsequently trained CSOs in-

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country had contributed to the UNCAC review or anti-corruption activities. There is a lack of clarity regarding the relationship between the annual targets for Outcome 4 on the number of CSOs trained per year of the programme, and the achievement of the overall objective of 75 CSOs trained, as it is not specified whether attendance of different representatives from the same CSO is allowed across the different years of the programme.

Outcome 5 was less comprehensively articulated in how this contributes to the overall impact of the programme in building CSO capacity to engage in anti-corruption, given the high barriers which exist in the region to private sector organisations wishing to engage in anti-corruption. The expectation of joint advocacy and media campaigns in-country between CSOs and business was somewhat optimistic given the programme activities of convening joint trainings and workshops, and it was less clearly stated how the activities would contribute to the outputs and outcomes. For example, output 5.2 specified joint advocacy with media and the private sector, yet activities related to this output do not involve specifically private sector involvement, nor are the indicators designed to capture this. The risk log misses the inclusion of risks related to the engagement of the private sector in the programme - prior planning for lack of willingness may have allowed for the development of appropriate mitigation strategies, while detailed contextual analysis of the region and stakeholder consultations with regards to private sector engagement in anti-corruption may have resulted in revised expectations for the programme of work.

The logical pathway for Outcome 6 is clearly stated, as well as directly contributing to the achievement of the overall impact of this Regional Programme on CSO capacity to prevent and fight corruption. Activities stated in the logframe related to the E-platform are related to the development of the platform which, while making positive contribution to the achievement of this outcome, missed activities related to soft-launching and revising the content via testing with beneficiaries and external users. Activities contributing to website maintenance and upkeep once the website had been launched would have been useful to better facilitate networking (which was the aim of the platform). The risk log did not include risks related to lack of ongoing usage of the e-platform for networking purposes, which may have allowed for appropriate mitigation strategies to have been developed in advance. This outcome area also includes activities to build political will for working with CSOs on the UNCAC reviews (6.3.1), however, this is included under the output of 6.3 around intergovernmental meetings. Given that political buy-in is central for CSOs being able to use their UNCAC skills and knowledge in the country review, and this was well facilitated by this programme of work via the trainings and workshops offered, it would be suggested to mainstream such activities under Outcome 4 and to give a greater importance to this area of work in the overall project plan. The risk log does include a mention of lack of political buy-in as a noted risk for the achievement of the UNODC's activities. However, this was foreseen as having a low likelihood (despite the challenging political environment in the region described in Section 3 of this report) and the mitigation strategy is insufficient to respond to this risk as it focuses on training CSOs adequately and providing a platform for discussion which would not address the underlying issue of a poorly engaged or unresponsive focal point.

## **Effectiveness**

**The Regional Programme was generally effective, in the sense that the planned activities and outputs were largely realistic and were implemented to a generally high standard. More crucially, it was effective in the sense that most expected outcomes were achieved, and where not fully achieved, developments towards achievement were observed. Where it had more limited success was in the follow-up on activities to ensure the momentum gained was sustained, the coordination across the individual outcomes and the knitting of civil society and state anti-corruption actors more closely together through the Programme activities, particularly across the two parts of the Programme.**

### To what extent were the 6 objectives/outputs of the Programme achieved?

Overall, RAI's Outcomes 1 and 2 were successfully implemented and the expected results were largely in line with the logframe, with the exception of the implementation of IT solutions which by the end of the programme had not been finalised and were not 100% ready for roll-out. The signing of the International Treaty on Exchange of Data for the Verification of Asset Declarations (Outcome 3) is a further major output that is pending and has been recently delayed due to the public health crisis over COVID-19.

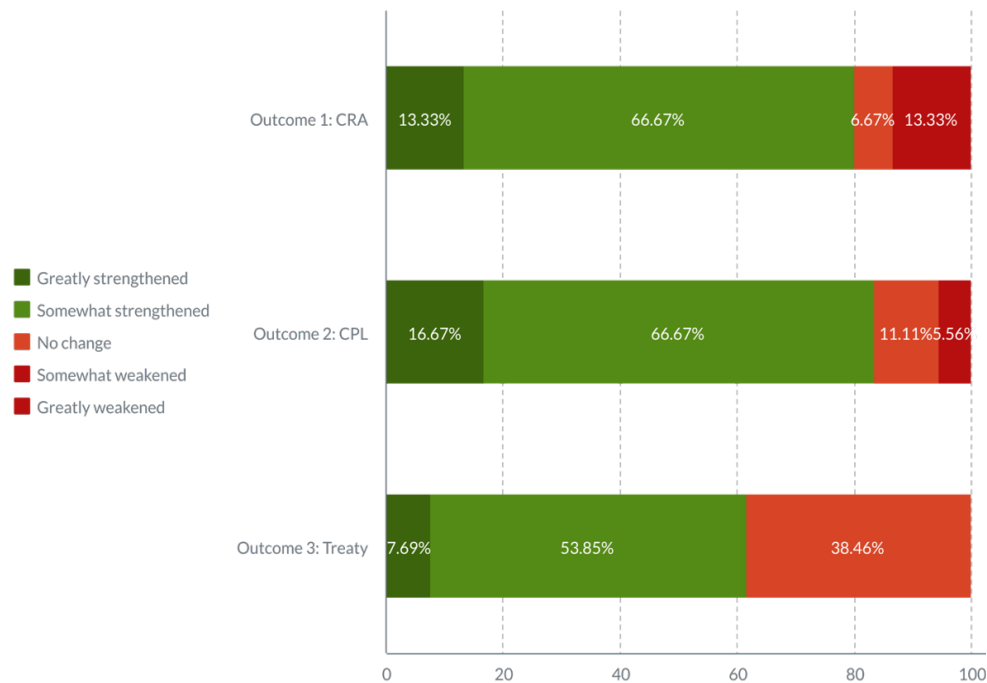
**Figure 11. Table showing effectiveness of Outcomes 1-3 in individual beneficiary countries.<sup>30</sup>**

	Albania	BIH	Kosovo*	Moldova	Montenegro	North Macedonia	Serbia
Corruption Risk Assessment introduced or strengthened?	N/A	✓	N/A	✗	✓	✗	✗
Corruption Proofing of Legislation introduced or strengthened?	✗	✓	✓	✓	✓	✓	✗
Active participation in International Treaty drafting and negotiations?	✓	✓	✓	✓	✓	✓	✓

**Note:** N/A indicates that the country was not a target for the Outcome, indicates the Regional Programme achieved its Outcomes in the country, X indicates non-achievement (changes may have occurred but these are not attributable to the Programme)

From the beneficiaries' perspective, all RAI outcomes were deemed to have been effective. 12 out of the 15 RAI beneficiaries who were involved in CRA, and who answered our survey, reported that CRA mechanisms (Outcome 1) have been greatly or somewhat strengthened in their country over the course of the Regional Programme and similarly 14 out 18 respondents involved in CPL outcome (Outcome 2) reported the same. For Outcome 3, just under ⅔ of respondents (8 out of 13) felt that regional cooperation on data exchange had been strengthened. This lower figure is likely attributable to the fact that the Treaty signing ceremony had yet to take place at the time of the evaluation and so no formal change with regard to the law on data exchange had occurred and no change to the practices of data exchange on asset declarations will have been experienced in-country to date .

**Figure 12. Chart to show perceived effectiveness of RAI Outcomes among involved beneficiaries (2020)<sup>31</sup>**



#### Outcome 1: Strengthening Corruption Risk Assessment

Regarding Outcome 1, the overall target of 3 beneficiary countries introducing or strengthening the CRA mechanism was achieved. At the early stages of implementation, 5 jurisdictions were initially planned to be engaged (BiH, Kosovo\*, Montenegro, Moldova and North Macedonia) but ultimately the Outcome targeted the 3 countries of BiH, Montenegro and North Macedonia, due to the fact that both Kosovo\* and Moldova already were implementing a CRA methodology and this work would have been duplicated. Through the Regional Programme, national methodologies on CRA were developed for 3 countries (BiH, Montenegro, North Macedonia) and trainings were carried out in each of these jurisdictions. According to our survey, all 14 respondents (covering all 7 beneficiary countries) who reported attending a training workshop on CRA found it to be either ‘very useful’ or ‘fairly useful’. Legal opinions on national methodologies were provided for Moldova, BiH, North Macedonia, Montenegro, to support the introduction of the concept of corruption risk assessment into the national legislative framework and/or administrative practice. The evaluation finds that the activities were more successful in *strengthening* already existing CRA practices than in *introducing* a new CRA mechanism to contexts where they were not already in use.

In Montenegro, Outcome 1 was particularly successful. CRA was already being implemented in the country in 2016 but for a limited number of institutions. By 2020 it is mainstreamed across the public sector. According to one RAI beneficiary interviewee, “*the timing of the RAI intervention was excellent because the government had just decided to extend CRA to 700 institutions which APC had to oversee. There was huge pressure on us to support these 700 integrity managers responsible for delivering CRA plans and the external support and expertise from RAI was very helpful*”. With the help of the Regional Programme, expert guidance was provided on Montenegro’s CRA approach and according to an in-country beneficiary respondent, “*a lot of the recommendations were sensible and useful and we were able to implement them as we went into the next round of Integrity Plan reporting to strengthen our approach*”. Additionally, under the Regional Programme more than 200 Integrity Managers across 700 public institutions at national, municipal and local level were trained in 3 workshops nationwide over the course of the Regional Programme. According to a beneficiary in the country, “*these trainings were very helpful for the APC to reach a broad range of the institutions. The materials and experts involved in the*

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*trainings were excellent and trainees provided positive feedback. Another benefit was networking: integrity managers gained connections and exchanged lessons learnt with other institutions working in different institutions but experiencing similar challenges with regard to corruption risk assessment.”* A further highlight was the tailored support for the health sector in Montenegro via a training workshop (in Podgorica in April 2018) and expert guidance on this sector’s new integrity plans. According to an attendee, *“RAI experts provided feedback on those draft Integrity Plans which was subsequently shared with all healthcare integrity managers and led to the improvement in the quality of integrity plans in many of the institutions.”* This sectoral approach was lauded as very relevant and potentially should be used more broadly in future programming.

As for the impact of the interventions in Montenegro, those responsible for monitoring CRA in the country concurred that the trend is towards better quality Integrity Plans drafted by public institutions and while it is undoubtedly difficult to measure the exact contribution of the Regional Programme to this change, interviewees in the beneficiary institution in the country were unanimous that the RAI interventions had made a significant positive impact.

In North Macedonia the outcome can be seen to have been partially achieved. The existing CRA framework in North Macedonia was deemed more complex than in other countries, and unusually it is under the remit of the Ministry of Finance. Through the Regional Programme, RAI appropriately provided expert support on pointing out the limitations of their existing approach (which has too much focus on financial risk) and provided recommendations for revising the national methodology, which were partially implemented and thus strengthened the CRA mechanism. North Macedonia did adopt a new guideline on fraud and corruption risk assessment in 2017, which our interviewee described as being *“inspired by RAI activities but not officially under the programme”*.

In BiH, as mentioned previously,<sup>32</sup> two beneficiary institutions were included in the Programme (APIK and HJPC), although this was not originally envisaged. Apart from issuing recommendations on improving the CRA mechanism in the country, the key focus was on the development and roll-out of the IT solutions for CRA (related to Programme Output 1.3). The inclusion of HJPC in the Programme was a good decision on the part of RAI because HJPC appears to be highly engaged in the fight against corruption and to have particularly high absorption capacity for the IT solutions. Both beneficiary institutions, during our field visit to Sarajevo, expressed a high degree of satisfaction with the RAI cooperation and emphasised the ongoing relevance of the digitalisation of CRA for their work. The Regional Programme originally envisaged creating one tool which could be customised to different institutions but over the course of the implementation, it became clear that two separate tools were required because of the distinct needs of the judicial sector tool (HJPC) and the more general anti-corruption agency tool (APIK). The implementation of the IT solutions suffered some complications leading to delays and ultimately, by the end of Regional Programme, the IT tools have been developed but not fully tested and rolled out. Both beneficiaries were confident that after a testing phase, they will indeed be rolled out and implemented in 2020. Both institutions expressed satisfaction that the end result will aid their work and make the analysis of integrity plans by anti-corruption bodies much easier. Notwithstanding the delays and complications in developing the IT solutions, as one regional stakeholder commented, *“a big positive from the CRA work was that it allowed the countries to narrow down the CRA approach and to work more on a sectoral level, such as with the health sector or judicial sector. This is needed in many of the countries and allows for a more tailored, and ultimately more useful, corruption risk assessment”*. The HJPC co-operation in BiH was a good example of this successful sectoral approach.

#### *Outcome 2: Corruption-Proofing of Legislation*

Regarding Outcome 2, the overall target of 3 beneficiary countries introducing or strengthening their CPL mechanism was achieved. CPL was a novel tool for most of RAI’s member countries, apart from Moldova who were very experienced with CPL, and the Regional Programme helped countries to explore this largely untested tool. It was quite experimental, and it

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remains unclear if there is political appetite for meaningful implementation of this novel tool in the region. Through the Programme, RAI experts developed national CPL methodologies for BiH, Montenegro and Kosovo\*, and ultimately, at the end of the Programme, 4 countries were implementing the CPL mechanism (Montenegro, Moldova, North Macedonia and Serbia), although a regional stakeholder with knowledge of the context in Serbia reported that the CPL methodology being implemented there was not in line with recommended approach. The beneficiary in BiH reported that a unit on CPL was being created at the time of the evaluation. Legal opinions on national methodologies were provided for Moldova, Serbia and Albania and trainings were carried out in BiH, Montenegro, Macedonia and Kosovo\*. According to our survey, 13 out of 14 respondents who reported attending a training workshop on CPL found it to be either ‘very useful’ or ‘fairly useful’. It is also worth noting that the CPL training manual, package and presentations were extremely high quality, the didactical approach was interactive and well thought through. An IT solution for the digitalisation of CPL was developed and rolled out for Montenegro and BiH, which although not fully rolled out at the time of the evaluators’ in-country field visit, was subsequently finalised in March 2020 and can be seen as a successful output of the Programme. Through the Regional Programme, Moldova took the opportunity to take a step forward and upgrade their CPL methodology and they are now implementing this even more closely in line with best practice. They are clearly the pace-setter in the field of CPL with over 10 years’ experience in it. As one regional stakeholder commented, it was somewhat a case of “*polishing a diamond*”, however the Moldovan mechanism was indeed strengthened through the Regional Programme. Furthermore, given their high level of experience with CPL, representatives of the Moldovan Agency were included in some trainings/workshops in order to present best practices and lessons learned for the other countries, which is a good example of regional knowledge-sharing fostered through the Programme.

In Montenegro, at the output level, this stream of work was also quite successful. In 2016, CPL was totally new to Montenegro and by the end of the Regional Programme, a dedicated CPL unit was functioning in the Agency for the Prevention of Corruption (APC) and an IT solution had been developed to digitalise the process of CPL. Beneficiary interviewees reported a huge improvement in capacities related to CPL in Montenegro: “*the RAI Programme came at a perfect moment for building capacities because the corruption prevention agency was brand new. CPL was included in the national anti-corruption strategy and so the RAI programme came at the right time.*” The CPL Unit is now fully functional and according to interviewees, they have delivered 15 opinions on draft laws to date. Regarding the downstream impact of this and whether any laws were adjusted in line with the opinions, we were not able to garner much information from respondents. It appears that this data is not being systematically collected, which is a notable gap and hinders our understanding of how effective the mechanism is as an anti-corruption tool. In addition, some interviewees commented that, within the APC, there had been a lack of political will at higher levels of management to approve strong CPL opinions on draft laws and that this had hindered the effectiveness of the tool somewhat. Notwithstanding this, others noted the extensive media attention paid to the CPL opinions and the potential for this to create another form of pressure for better law-making.

In North Macedonia, at the initial stages of the Programme, there was quick progress made on CPL in terms of outputs. A national methodology was produced and CPL training was held which was reported by trainees as being both practical and useful. A political crisis in North Macedonia and the period of 2 years during which the main beneficiary was dysfunctional meant the capacity and knowledge built through the training was unfortunately largely lost. Respondents interviewed during our field visit noted that there were improvements mainly in the levels of awareness among the relevant institutions related to corruption proofing. The in-country political context meant that the capacity building could not be turned into broader impact in a practical way. A beneficiary respondent noted that there are plans for a CPL unit to



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be developed and expressed an interest in rebuilding capacity on CPL among the newly constituted State Commission and this unit, when it is developed: *“within the next period, we do expect corruption proofing to be back on the agenda. First the capacity building needs to be done again properly. The methodology is comprehensive and needs to be properly implemented”*.

Overall, regarding Outcome 2, the Output and Outcome targets were largely met, however several regional and national stakeholders noted that there are ongoing questions about the level of political will for meaningful implementation of CPL in many countries of the region. It remains a contested approach and the nexus between legislators and the anti-corruption agencies and CPL units has to be carefully managed: *“You need to have lots of people and really good people on the team producing opinions. In Moldova, you have an anti-corruption agency with 500 people and a big corruption proofing unit but then in other countries, you may have like 5 people, which makes it much harder for them to produce quality opinions”*. A deeper assessment of each national context should be carried out to reveal the readiness and fitness for purpose of the CPL approach in each country.

### *Outcome 3: International Treaty on Data Exchange*

The signing of the International Treaty on Exchange of Data for the Verification of Asset Declarations is the only major Regional Programme output that is pending and the signing ceremony has been further delayed due to the public health crisis over COVID-19. While not formally fully achieved, Outcome 3 is considered by many national beneficiaries and regional stakeholders as the star performer of the RAI objectives. The objective is novel, ambitious and is considered to be a key element of the anti-corruption fight in the region and potentially, globally.

Output 3.1, with regard to the regional mechanism for data exchange in asset disclosure and conflict of interest being *negotiated* and *agreed* between all states, is evaluated as a success and all Regional Programme countries were actively involved in the process. 62% of beneficiaries who were involved in the Treaty negotiations and answered our survey felt that the regional framework for cooperation on data exchange was strengthened through the Regional Programme. Among the most active States in the process were Montenegro, Serbia, Bulgaria and North Macedonia. As a regional stakeholder commented, *“the activity is a success and it was a miracle to get all the experts of the agencies to agree. There were several moments where it might have failed because politically it was very sensitive. It’s a clear example of successful regional cooperation.”* The national implementation outputs (3.2 and 3.3) were not achieved and, in hindsight, were probably over-ambitious, given the complexity of the process of reaching agreement on an International Treaty. The achievement of agreement on the Treaty was not a foregone conclusion. As one respondent from North Macedonia who was involved in the negotiations stated: *“At first we were skeptical about the political will to sign and ratify such a Treaty. We had some doubts because we had some bilateral cooperation for the same purposes that could be used instead of a completely new instrument. Also, because different countries have different anti-corruption bodies with different competencies. For example, it is very recent that the North Macedonia State Commission has this competence. We had long discussions and it wasn’t easy but we came to an agreement. So that is a huge success because we were unsure whether this would be a useful agreement but now, we really see the value of the regional sharing of data.”*

Regarding the forthcoming signing of the Treaty, according to our survey, respondents from all programme countries apart from BiH were confident that the Treaty would be signed by their country. When asked about the prospect of parliamentary ratification, respondents from Albania, Kosovo\*, Montenegro, Moldova and North Macedonia thought this was either very or fairly likely. These findings should however be treated as indicative rather than conclusive, as the number of survey respondents who were involved in Outcome 3 was 13. Based on our interviews with beneficiaries and regional stakeholders throughout the evaluation, a more realistic expectation is for Montenegro, North Macedonia and Serbia to initially sign the

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Treaty. The delay caused by the COVID-19 crisis could be used as an opportunity to lobby the other governments (both inside and outside the region) to come on board at the outset, as the greater the number of signatories, the more momentum for implementation will be created.

The vast majority of beneficiaries and stakeholders we spoke to considered extending the Treaty beyond the SEE region as essential to its ultimate success as an anti-corruption tool. This is also reflected in our survey data, where 11 of 13 respondents (85%) who were involved in Outcome 3 reported seeing the Treaty as either ‘very or fairly relevant’ for countries beyond the SEE region. As one respondent from North Macedonia commented, *“we already have regional instruments so this needs to be more. It makes no sense to close it off to Western Balkans countries because many officials hide their assets further afield.”* The extension of the Treaty beyond the region should certainly be a focus in the next phase of programming.

A further point to note is that, over the course of the Regional Programme, civil society and other non-state stakeholders were not fully involved nor fully alerted to the importance of the Treaty and the gap it fills. According to our interviewees, civil society was informed in the early stages but were not carried through to the later stages and could have been better kept informed of the Treaty negotiation process. It will be important to consider a sustained communications campaign in the next phase of programming to ensure that civil society advocates have the full picture of the importance of this Treaty to the fight against corruption and can join RAI in advocating for its meaningful implementation in the region and beyond.

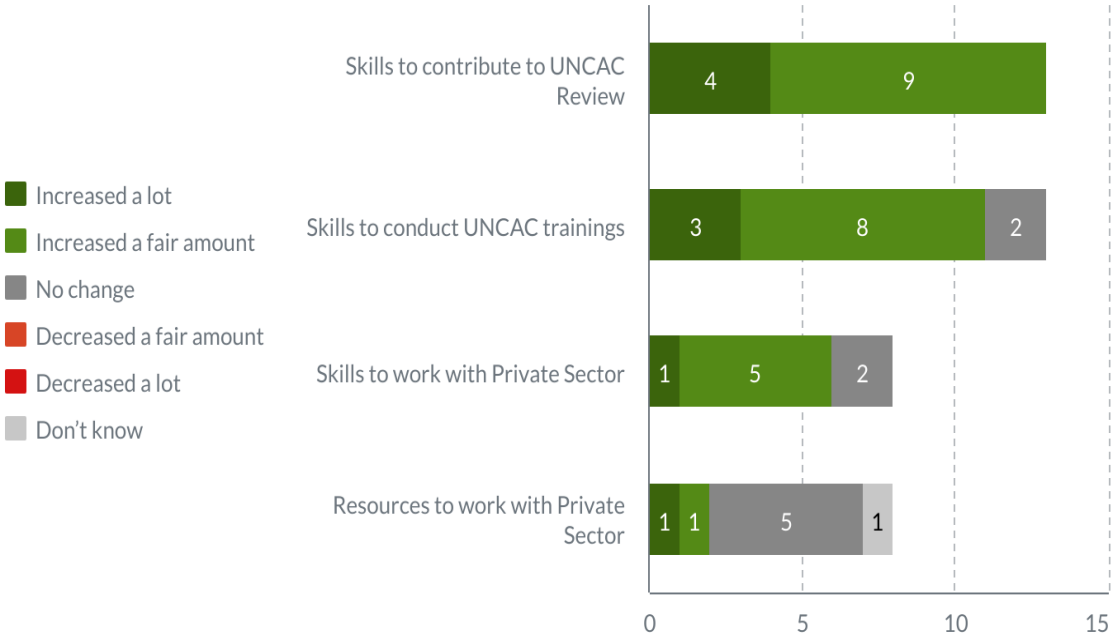
*Outcome 4: Did 75 CSOs and relevant stakeholders have an increased knowledge of UNCAC and capacity to contribute to the ongoing review, as well as their ability to conduct related training in their country/region?*

As a result of the Regional Programme, 73 CSO representatives from 57 beneficiary organisations were trained by the UNODC on UNCAC. 12 CSO representatives from 12 organisations were trained in year 1 of the programme, 30 CSO representatives from 28 organisations were trained in year 2, and 31 CSO representatives from 30 organisations were trained in year 3. The annual target (25) for number of CSO beneficiaries trained was not met in year 1 due to unforeseen delays at the start of the programme in the appointment of focal points, however, in year 2 and 3 the annual targets were exceeded. The trainings appeared to have been successful at increasing knowledge and capacity of the attending CSOs to become engaged in the review process in their country. The survey of CSOs found that of those who did attend the training 93% said that they increased their knowledge on UNCAC a great deal or a fair amount (or 13 out of 14 respondents) and 85% of respondents said that they were very or fairly likely to use their knowledge of UNCAC again in the future (or 12 out of 14 respondents). Both CSO and government interviewees noted that many CSOs in the region lack knowledge around UNCAC, and the convention is generally quite inaccessible, difficult to understand and complicated. The trainings organised by UNODC helped to increase knowledge about the UNCAC process, how it is relevant for anti-corruption work in the region and at what points CSOs can engage. As one interviewee from North Macedonia noted: *“I think they made a great deal with the workshops...For us it was a great experience because we were able to get some knowledge about UNCAC actually everything about UNCAC was shared there and it was not boring at all, and that this is the most relevant thing, as you don’t want to go somewhere for three days just to waste your time, so I think they are working on the right path”*. Positive reports of the trainings increasing knowledge on UNCAC were also found in the post-workshop feedback surveys conducted by the UNODC and the UNCAC Coalition after each event.

Many interviewees noted that the purpose of the trainings was clearly explained, the content was educational, interesting and engaging, and they felt it was a good use of their time.<sup>33</sup> However, it was suggested that the uneven levels of knowledge

among participants created challenges in how to tailor content while ensuring all participants remain engaged. While overall, the trainings were seen as useful and effective at increasing knowledge on UNCAC, some attendees reported that the content around UNCAC was quite general and basic given their previous level of understanding. This was also noted in the post-Vienna 2016 workshop feedback-survey of attendees, where some mentioned that the sessions felt rushed or basic and that some content could be covered by giving preparatory tasks prior to the start of the conference.<sup>34</sup>

**Figure 13. Chart to show perceived changes in capacity and resources in the UNODC focus areas under the Regional Programme - UNODC CSO Beneficiaries<sup>35</sup>**



The trainings were found to have been effective in building the capacity of CSOs to engage in the UNCAC review process (Output 4.1), with the survey of CSOs finding that all respondents reported that their capacity to contribute meaningfully to the ongoing review in their country/region had improved as a result of participating in the trainings (13 out of 13 respondents). The involvement of the government experts/focal points in the trainings was considered particularly useful in ensuring that CSOs can better contribute to the country reviews, as it provides an opportunity for them to meet which they might not get to do in their own country. Focal points often lack capacity to fully engage with civil society in their own country, are generally very busy and have limited staff support. Additionally, the trainings allowed CSOs and government to share perspectives and some focal points reported that they felt the trainings helped build trust between CSOs and government, as CSOs could better understand the review processes and why they could only contribute at certain stages. The workshops offer the governmental experts/focal points the opportunity to hear how other countries have involved CSOs in their review processes and how it has benefited the quality of the review, leading to some interviewees suggesting that there is improved political will for CSO engagement. As one CSO interviewee from North Macedonia noted: *“the State institutions that were part of the trainings were able to see a different approach from each country that were part of the trainings - maybe they can share knowledge within their institution and to be able to raise their voice [the focal point] about how the process should go... Not so many people in the State Institutions have knowledge about UNCAC.”*

In North Macedonia, the trainings gave one CSO the knowledge and skills around UNCAC which they lacked previously, as they had not been involved in the previous review. After hearing how other countries have engaged in the review process,

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this CSO decided to produce their own parallel report so that they could specify the views of civil society on the government's progress on UNCAC and they presented this report to the government. Despite this, they find it challenging to say whether any of their recommendations have been taken into account in the country review, noting that the government also lacks capacity to implement anti-corruption initiatives.

This was also noted by CSOs in BiH, who said that while they had engaged in the review process, they were not subsequently informed about how their recommendations had been used. In BiH, the government took the welcome step to publish the full report rather than just the executive summary, allowing for greater transparency in whether CSO recommendations have been included. One CSO interviewee however, noted that the country report included a great deal of CSO activities - suggesting that this was due to little capacity and willingness from the government to undertake anti-corruption initiatives. While CSO engagement is important, this needs to be met by a willing and able government to properly address corruption risks.

The workshops and trainings also provided an opportunity for networking and peer-to-peer learning between CSOs from other countries. Presentations as well as informal discussions outside of the presentations, allowed the CSOs to hear how the review process in other countries is handled, and how other CSOs have engaged in the processes. This allowed for knowledge sharing between countries and better prepare CSOs to engage in the country reviews for their own country. For CSOs in Albania, BiH, Croatia, North Macedonia and Montenegro, networking via the workshops resulted in a joint initiative to produce a comparative regional UNCAC report<sup>36</sup>, which was published in 2019, as well as learning from others about how to do their own parallel report. As one interviewee from North Macedonia noted: *"The CSOs who took part in the trainings helped make this process easier. They had some knowledge about the first cycle review which we didn't have, so they told us in what direction we should go, what should follow, should we focus on one chapter and what in that chapter because some of the chapters are very large, and it is not easy to make a review process on each norm as many different issues are covered, so that helped us a lot. We took a good example from Bosnia how they are with national focal point and with the CSOs...could use the other participants as good and bad examples."* The ability of the trainings and workshops to support peer-to-peer learning was aided by the dedicated one-day CSO-only session organised and run by the UNCAC Coalition. During this portion of the trainings, the Coalition gives advice on how UNCAC can be used to advocate more effectively for anti-corruption reforms. As noted by an interviewee from the UNCAC Coalition *"we have seen a number of the attendees have also then taken initiatives forward to get involved in the UNCAC review for example... where activists who before the workshop [may] not really [have] been familiar or aware of the UNCAC as an important mechanism and then decided it is worth using this to advance the mission of their organisation and it can be a really useful advocacy approach."*

The Regional Programme was also seen as successful in achieving intended outcomes related to the inclusion of women in the trainings - in year 1, 67% of CSO attendees of the trainings were women, in year 2, 70% were women and in year 3, 55% were women. In addition, the project achieved the desired goal of including CSO attendees from ADA priority countries Albania and Moldova.<sup>37</sup>

The activities were found to be effective in increasing CSO *capacity* to conduct their own trainings in their own country on UNCAC (Output 4.2), yet this was not put into practice by most CSOs involved in the programme. The survey of CSOs found 85% saying their capacity to conduct UNCAC related trainings in their country/region increased via the programme, however, the number who said that they replicated the training was much lower with only 4 out of 13 respondents saying that they had done this. Despite being few in numbers, all 4 CSOs who organised their own trainings said that they were very or fairly successful.<sup>38</sup> In North Macedonia, a CSO was able to organise a workshop just for CSOs in the country about UNCAC and what they can do to engage. They also organised a subsequent follow up meeting with the Government focal point and CSOs that work on the same issue. They invited a CSO representative from Poland to talk about their Shadow

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report while a representative from the UNCAC Coalition joined. These connections were reportedly made via the UNODC's workshops.

The ability or inability of CSOs to replicate the trainings was reportedly due to whether funding was available. For some CSOs (such as the CSO from North Macedonia mentioned previously) they were able to use existing funding from other donors to conduct the training. As UNODC does not directly provide funding for such follow-up activities, many CSOs reported that the lack of funding prevented them from doing this, as well as mentioning there was no real incentive for them to undertake this additional work. Some also noted that after leaving the trainings, momentum for follow up activity generally lagged as they went back to their normal tasks. Some reported that "train the trainer" sessions would have been useful on how best to organise and give trainings on UNCAC, which may have helped the programme be more effective in this area.

*Outcome 5: Did CSOs have increased skills/resources to work in partnership with private sector in UNCAC review process and did they raise awareness (local, regional and international level) through campaigns/ advocacy material?*

This outcome was only partially achieved via the Regional Programme as while the majority of CSO survey respondents reported that they had gained *increased skills* to work with the private sector, few reported *increased resources* or having taken part in *joint advocacy campaigns*. The joint workshops<sup>39</sup> organised by UNODC, which had additional funding support from the European Bank for Reconstruction and Development (EBRD), were generally well received by the participants who mostly said that they were a good use of attendees' time (including both members from the private sector and CSOs).

Attendees from the private sector welcomed the opportunity to be involved in such large international conferences as an opportunity to be informed about the latest anti-corruption initiatives, as it helps them stay relevant and up-to-date. Three quarters of the CSO survey respondents who attended these training workshops said that their skills increased to work with private sector in UNCAC review process (6 of the 8 respondents who participated in the trainings around working with the private sector) while 2 said there had been no change in their skill level (output 5.1). As one CSO attendee from North Macedonia said: "*The trainings are great because especially you can connect with others and you can share knowledge with other countries. So, the trainings are a good method and they should continue this method as they are strengthening the platform with CSOs and the business community working on the UNCAC issue.*" Evidence of increased knowledge gained from the content of the trainings was also found in the post-conference feedback surveys which were administered by UNODC after the events.

Participants noted that the sessions were engaging and interactive, and they liked hearing about positive cases of compliance and business ethics, although 1 interviewee did note that some case study examples were not relevant for the context of the SEE region. Despite positive reports on the quality of the presentations given, some interviewees noted that the content coverage during the trainings on UNCAC was quite general and superficial, and a more in-depth coverage of UNCAC would be welcomed. This was echoed in the post-conference feedback surveys, for example, after the Sarajevo training, a number of respondents requested more in-depth coverage of the articles, as well as more practical exercises and country examples.<sup>40</sup>

While there were overall positive impressions of the trainings, follow up media/advocacy activities between CSOs and the private sector (output 5.2) were found to be generally limited, and few CSOs report being equipped with more resources to work with the private sector as a result of the trainings. Only a quarter (25%) of survey respondents from CSOs who took part in the trainings reported increased resources to work in partnership with the private sector in the UNCAC review

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process (or 2 out of 8 who took part in the trainings) while the same proportion, reported doing joint advocacy/campaigns with the private sector (or 2 out of the 8 who took part in those trainings) as follow up after the training.<sup>41</sup> A number of the private sector organisations involved in the workshops said that they have not been engaged by CSOs in any follow up activities. Some noted that there was a lack of clarity on who would take the lead on such initiatives and whether these joint initiatives should be driven by private sector/CSOs or UNODC. As noted by a Business Stakeholder: *“There is a lack of ownership who will lead the game change - civil society or the business community - we don’t have that consensus. There are several independent initiatives... the topic is always anti-corruption, public procurement, this portal from the ministry of finance on public spending - for me it is a nice makeup and nothing else.”* Another Business Stakeholder said that they had no plans to engage in any follow up advocacy as their company tries to stay out of politics. While they found the content of the presentations on UNCAC helpful, they do not have a compliance department so this cannot be applied in their work.

Despite this, the evaluation did find a number of preliminary examples of joint initiatives which may develop at a later stage to having advocacy or media impacts. In North Macedonia, a CSO organised a follow up training involving the private sector, because they saw that via the workshops and trainings in other SEE countries the private sector was involved in anti-corruption, and the business community can be a useful ally. They organised a three-day workshop involving 30 people to speak about UNCAC, the problems they are facing in their own organisations and how UNCAC can be a solution. They said: *“When we went to Belgrade, the first workshop, we saw that from each country there were participants from the private sector for each country. But we noticed that for North Macedonia there were no participants from the private sector and we thought this was a time waste and why they would not engage in these processes. So, we got the idea for our workshop, from the workshop in Belgrade.”* The same CSO is also part of a platform of CSOs against corruption in the country. When the platform was considering who would be a good partner for different initiatives, the CSO was inspired by the experience of other CSOs in the region, gained via the workshops and trainings, and thought that the Chambers would be relevant. They have since signed 2 Memoranda of Understanding with Chambers in their country, although these have not yet led to any joint work as it is fairly recent. In BiH, a CSO also reported giving joint trainings with private sector to their constituents and the content of the trainings include UNCAC relevant material.

Furthermore, there was a joint declaration - the Belgrade Outcome Statement - which was co-created and signed by private sector organisations and CSOs in a follow up meeting after the Belgrade workshop in Feb 2019, which was designed as a living document which is action orientated giving recommendations to government about having an inclusive UNCAC review process.<sup>42</sup> The outcome statement was signed by 9 CSOs and 6 private sector representatives, and it was since translated into Serbian by a CSO, and the International Chamber of Commerce in Albania features the statement on their website launched for the Week of Integrity in December 2019.<sup>43</sup> Some participants at that workshops however said that they found the discussions around the statement quite basic, with some not fully understanding their role in the discussions. While interviewees noted that the UNODC had been quite communicative in informing signatories of the follow up on the statement after the event (for example, when the statement would be released), they now felt unclear about the exact purpose of the statement and what their roles should be in implementation. One CSO beneficiary from North Macedonia noted that the basis of the engagement of the business sector around UNCAC needs further thought, given the specific motivations of companies: *“[The joint Belgrade Statement] was a good start but it is not well structured - we need to bring on board the private sector on the basis of why it is good for them and what it will bring on their daily work, some the added value, something more and what they need to know about it. It was a good initiative, it was a good start that needs to be developed further. Even if we look at the UNCAC provisions we can see that not all are relevant for the private sector.”*

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*Outcome 6: Did CSOs have enhanced networks and contribute to the review process in an open and constructive dialogue with their government, facilitated by the creation of a virtual regional knowledge management hub and active participation in intergovernmental meetings?*

The activities organised by UNODC as part of the Regional Programme were noted extensively as having been very effective at enhancing networks - both within countries, such as between CSOs, government focal points and the private sector, and between countries. Just over half of the CSOs surveyed said that they had engaged in dialogue with their national government about the UNCAC review, however, of those who had dialogue half found it unconstructive. The creation of the e-platform hub was generally welcomed as a space to share information, access contact information of CSOs and for knowledge-management of important documents. However, ongoing usage of the platform is sporadic, as it has low visibility.

Both Government representatives and CSOs reported that the workshops and training events provided them with an opportunity to meet, which they often do not have in their own countries. The workshops also benefited by including a broad range of CSO groups not just the very established anti-corruption organisations, but those that focus on different local or regional issues. As some of these groups are smaller in size and have a lower profile in their country, invitations to workshops and events provides them with a greater profile with government, which was welcomed by the CSOs. Of the CSO survey respondents 12 out of 13 said that the UNCAC trainings created a constructive space for dialogue.

These opportunities to connect have meant that CSOs were able to contribute to the review process in their own country, where they provided recommendations to government, contributing to a more inclusive and transparent review process. 8 out of 15 CSO respondents to the survey reported that they had dialogue with their government about the UNCAC review process, which demonstrates that the review processes can increase engagement with CSOs. However, of those who had contact with their government on the review process, only half reported that the dialogue was constructive and open, while the other half conceded that their dialogue was unconstructive and not inclusive. One of the survey respondents elaborated that their government takes an *"unconstructive approach"* and that *"no matter how open is the process of the consultation, the recommendations of the CSOs are almost never taken into consideration."*

The 'SEE Anti-corruption e-platform' (herein 'E-platform')<sup>44</sup> was developed under this Regional Programme and was launched in March 2017 (output 6.1). It is hosted on the UNCAC Coalition website and now profiles 35 CSOs from across the region<sup>45</sup>. It is reported to have been used by a number of CSOs involved in the Regional Programme with 10 out of 13 CSO survey respondents having said that they had used the platform at least once, with the majority of users saying that they had used it a few times. The platform is generally perceived to have supported the enhancing of networks, with 70% of CSO survey respondents reporting that the virtual regional knowledge management hub enhanced their network to contribute to the review process - or 7 out of 10 respondents. Almost all visitors to the platform had used it to get information about other NGOs/ civil society organisations working on anti-corruption and the UNCAC review process (90%), while a substantial majority had also used it for information about the UNCAC review in their country (80%). The platform does offer a space to host information about UNCAC in a user-friendly way, which is not offered by the main UNODC webpages on UNCAC, which were reportedly not user-friendly and contained broken links and unclear terms. Having a separate space, such as the platform was therefore welcomed. However, the limitations with the website for improving the effectiveness of networking is that it is static and doesn't provide any incentives to come back to the site frequently. Newsletters, social media website posts or simple emails may be more effective methods to share information about what other CSOs are doing - if linked back to the e-platform, such regular communications could also serve to increase website traffic and improve visibility.

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Just over one third of CSOs surveyed who took part in the Regional Programme said that they had attended international conferences/intergovernmental meetings (or 5 of 14 respondents), with the median number of meetings attended being 3<sup>46</sup> (output 6.3). A majority (80%) of the CSO attendees to these meetings said that they made useful contributions (4 out of 5). A CSO from BiH reported that they had been invited and attended the seventh session of the Conference of States Parties to UNCAC and gave two presentations jointly with government, in a side event. *“It was a good idea to share what was the good side of the collaboration between us and government... It was good to share what we can do together, not what our differences. It is obvious we have differences but we want to work in a way that the government is not our enemy, but it is our partner and they [the government representative] explained that they are now more open to civil society”*. They noted that there were many joint initiatives between this CSO and APIC, with positive collaborations including a Transparency Pledge. CSO ability to attend international meetings was often made challenging due to lack of funding or lack staffing to attend. That said, some noted positively that they were pleased to receive invitations from the UNODC for intergovernmental meetings and would welcome the possibility to attend in the future given UNODC often provides travel cost support for CSOs.

### **What were the major factors which influenced the achievement or non-achievement of the Programme?**

#### *Achievement*

There were several factors which influenced the achievement of the RAI Programme objectives under the Regional Programme. Above all, RAI is a regionally-anchored organisation with in-depth knowledge of the contexts in which its beneficiaries are working and receptive beneficiaries who are open to regional cooperation and buy into the programme’s objectives. RAI’s strong network and relationships with beneficiaries and regional stakeholders allowed them to tailor the programming well to the needs of the beneficiaries and to build on previous experiences and interventions. RAI showed flexibility to include unforeseen beneficiaries when that made sense for the broader Regional Programme, particularly in BiH where the HJPC, Civil Service Agency and the Federal Anti-corruption Team, who each expressed an interest and need in the CRA and CPL mechanisms, benefited from the programme in addition to the anti-corruption agency. This flexibility to include highly motivated anti-corruption institutions into the Regional Programme showed an awareness of the broad landscape of anti-corruption actors in each country, a responsiveness to institutions’ needs and joined-up thinking about the importance of having institutions work together to combat corruption effectively.

Apart from a committed and professional internal staff at the RAI Secretariat, RAI also made excellent choices in terms of the external consultants who were contracted to deliver various aspects of the Regional Programme, from methodology development to training delivery. Indeed, the design of the trainings (both on CRA and CPL) were appreciated by trainees for their interactive methods, animated trainers and well thought through didactic approaches. The development of country-specific (and sometimes sector-specific) tailored training modules, taking into account prior level of experience with the subject matter and often bringing in examples from the national context, to make the training as relevant as possible to the audience, made most of the trainings very successful.

In Montenegro, RAI benefitted from good timing with the start of the Regional Programme coinciding with the establishment of a new anti-corruption agency with competence for both CRA and CPL. This window of opportunity was seized upon and the beneficiary was able to make good progress on both Outcomes.

Regarding Outcome 3, RAI’s vision of an International Treaty on the Exchange of Data for the Verification of Asset Declarations was an ambitious one and highly relevant to the region and the broader anti-corruption community. Its success (to the extent that it was negotiated and agreed on by all States) was linked to the choice of excellent experts on



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both the anti-corruption and the international law sides. The commitment from the experts and very active beneficiaries (including Bulgaria as an EU member state) was a clear driver of success, as was RAI's own careful mediation of the politics of the negotiations. RAI's decision to involve Austria as both a host of the first Negotiation meeting and the host of the signing ceremony was strategically wise and will send an important message to the EU and global community on the importance of this instrument.

In relation to Outcomes 4-6, there were a number of factors which contributed to the achievement of various aspects of the Regional Programme. The excellent reputation of the UNODC in the region motivated attendance from different sectors to attend and engage with this work. Similarly, the continuing relevance of UNCAC in the region and engagement of governments in the current review process also contributed to greater interest among CSOs to attend the trainings. The high quality of presentations during the trainings and workshops (including sessions given by well-respected experts) were noted by a number of attendees as motivating factors for them to stay present during the sessions and to engage in the discussions. The inclusion of interactive training elements including the role-play mock review and hearing testimonies from attendees who had gone through review processes before were noted as being very effective at increasing knowledge. The collaboration with the UNCAC Coalition on the Regional Programme design, helped to ensure that the content of the sessions was relevant for the region.

Another factor contributing to the success of the Regional Programme was the inclusion of a wide range of CSOs (both well-established anti-corruption CSOs and smaller CSOs who were new to UNCAC) at the events, with the UNODC drawing on advice and recommendations from partner organisations including RAI, the SELDI network and UNCAC Coalition to ensure attendees came from relevant organisations. The Programme team also made efforts to engage CSOs with a broader focus including drugs, human trafficking, youth issues and gender which helped support an inclusive dialogue during the trainings however, less evidence is found to substantiate whether these groups have influenced the UNCAC review process for their country. The E-platform was also successful as it utilised the partners SELDI network and UNCAC Coalition in the development of the website, creation of content and the engagement of CSOs for including their profile on the platform. The attendance of the governmental experts/ focal points at the events was also another success factor, as was the inclusion of chambers and business associations who have greater freedom to advocate on anti-corruption and some of whom are currently already organising their own trainings of companies around business ethics and compliance.

The workshops and trainings were well organised and well-funded, making them attractive for a range of participants to attend, and to repeat attendance. The UNODC team were noted as very responsive both before the training events and afterwards on follow up questions about the UNCAC review for their country. For funding follow-up initiatives, the relevance of UNCAC for workstreams supported by other donors meant that CSOs were able to continue working on the UNCAC review after the trainings and workshops had ended.

#### *Non-achievement*

Factors which hindered the success of the RAI interventions included unforeseen national institutional changes among key beneficiaries including the collapse of the State Commission for Anti-corruption in North Macedonia, the disbanding of the main beneficiary Ministry in Albania and the restructuring of the Agency for Anti-corruption in BiH. This instability led to the loss of momentum in North Macedonia on CPL and the failure of Albania to get off the ground with regard to Outcomes 1 and 2.

In addition, the Programme was operating in a diverse landscape of beneficiary institutions with regard to needs, resources, competencies and independence, leading to different levels of progress across beneficiaries. The beneficiary

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institutions also work in climates of varying levels of political will for meaningful corruption fighting. This variation had an impact on the meaningful implementation of both CRA and CPL. While in some contexts, these interventions are carried out as tick-box exercises, in others they are taken much more seriously, and this affects their downstream impact greatly.

Regarding capacities for IT solutions, for example, even within BiH there is a huge discrepancy between the IT capacities at APIK and HJPC, the latter being much more experienced and having the required human resources to roll out such IT projects. The Regional Programme design did not take account of this variation enough which led to time and resources lost on trying to develop a solution to suit both institutions, when separate solutions were ultimately required. This was the first time RAI ventured into the area of digitalisation, an innovative area of work for them and which should be applauded. However, a lack of experience by RAI in digitalisation projects can be seen as having contributed to the partial failure to deliver on the IT solutions within the timeframe of the Programme. Stakeholders agreed that insufficient time and resources were allocated to the development of specifications for the IT tools in the early stages of implementation, which led to avoidable conflicts and delays.

Regarding Outcome 3, the design of this ambitious Outcome was, in hindsight, over-ambitious. RAI underestimated the complexity and time needed to negotiate and implement an International Treaty from start to finish, not to mention to have it implemented by national governments (which was foreseen in the logframe but not ultimately achieved within the timeframe).

In relation to Outcomes 4-6, there were a number of factors which contributed to limited follow-up activities by CSOs (such as engaging in the review processes, creating their own shadow reports, and convening their own in-country trainings). Beneficiaries felt that there was a lack of clarity on who would be leading on follow up activities, and the lack of on-going communication or coordination of beneficiaries within-country after the trainings meant that motivation was lacking and beneficiaries had other priorities/commitments to focus on which were higher on their agenda. While the content of the trainings was well received by participants, many mentioned that no clear action points or next steps were defined during the training, leaving a lack of clarity about how best to proceed with applying the learnings from the workshops to their own country context. The lack of funding provided by UNODC for CSOs to conduct follow up activities was mentioned frequently as a reason why many CSOs did not organise UNCAC-related trainings in-country. Without allocated funding for such activities by the programme, only the most well-resourced and high-capacity CSOs could fully engage in the follow up activities, limiting the inclusiveness of UNCAC review dialogues. Some even mentioned that they were unaware that the objectives of the Regional Programme included organising in-country trainings of other CSOs on UNCAC and launching joint advocacy with the private sector. Similarly, for the follow up engagements with the private sector, there was a lack of clarity on who would be leading on these initiatives.

Additional factors which prevented CSOs from organising their own in-country trainings were mentioned that they had no real incentive to do this, given the high amount of work that would be entailed in the organising of such events. In addition, some CSOs said that they were not provided with materials to better enable them to conduct their own in-country trainings - such as printed manuals, PowerPoint presentations, and briefing documents. While the content of the trainings was well received, the sessions did not specifically include a “training the trainer” approach to build capacity of the CSOs to actually conduct their own training to ensure that in-country trainings are effectively delivered.

Factors which constrained the success of the engagements with the private sector include wider contextual issues, that within the programme countries there is limited incentives for companies to engage in anti-corruption work due to high levels of corruption in government (who disperse public procurement contracts), few prosecutions or fines for corruption,

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and limited citizen demand for clean business. One Business Stakeholder noted that, while in their country it might look as though business is consulted, they are not. Additionally, it was mentioned that private sector companies in these countries have little awareness or understanding of the importance of anticorruption. As noted by one CSO beneficiary in North Macedonia, *“anti-corruption, business ethics and corporate governance are still not issues here - compliance [are] not ...issue[s] for the business sector except for those who this is obligatory like the banking sector as they have to have compliance system. But the others they do not need to have it.”* Some of the individual companies who were selected to attend the workshops/trainings did not have plans to engage in anti-corruption advocacy and do not have compliance departments, reducing the effectiveness of the activities. Contextual analysis and stakeholder analysis for the region can assist with the development of appropriate strategies for the engagement of the private sector by the UNODC.

The Sarajevo workshop provided fairly limited opportunities for the private sector and CSOs to interact - something which the Regional Programme team responded to with the Belgrade workshop by providing more joint sessions. While having closed-door sessions just for the private sector was welcomed by many business attendees, as it allowed them to speak openly, the lack of interaction meant that CSOs were not able to make connections during these events which would have better supported the achievement of follow up activities (such as joint advocacy and media campaigns). Some of the content of the trainings and workshops was found to be generally more tailored to those with a lower level of understanding. This left some attendees feeling that the sessions were too general and their understanding did not increase to a significant extent (this was also noted by CSOs on the UNCAC information). Some interviewees from the private sector noted that UNCAC specifically doesn't have much relevance for their work, so while the content was interesting, more tailored content on business relevant issues would be preferred.

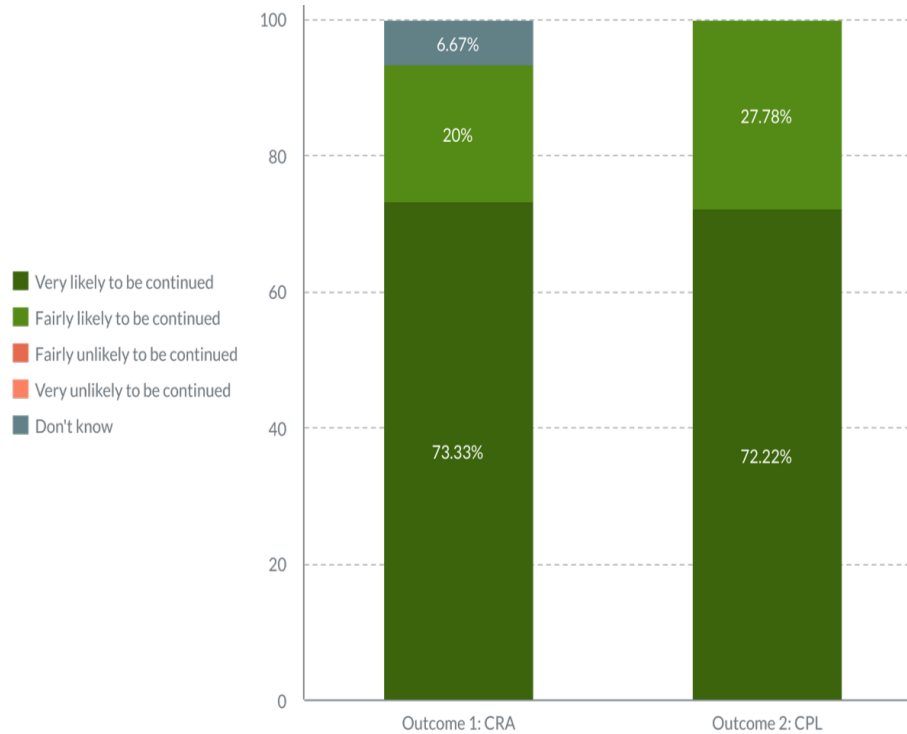
Another factor preventing CSOs from engaging in the UNCAC review for their country and more generally engaging with their government with constructive dialogue was lack of political will within their own country. In some countries, such as Serbia, the government showed little willingness to engage civil society in the review. Anti-corruption agencies or UNCAC focal points often are hampered by lack of capacity, resources, training and time to fully engage with civil society. As the UNCAC review process does not require CSO engagement, only recommends it, this also reduces the incentives for focal points to undertake this.

Factors which have contributed to the e-platform being less effective generally relate to the lack of ongoing follow-up communication or efforts to drive beneficiaries to the site. Ongoing communications staff were not budgeted for under this project which meant no one is tasked with keeping the website relevant.

**To what extent are the beneficiaries capable and prepared to maintain the positive effects of the development interventions without support in the long term?**

Many results achieved by the Regional Programme show a high likelihood of sustainability. This holds true for the activities aimed at building institutional capacity and expertise, both at the state institutional level and among CSOs. For CSOs, they intend to continue using their knowledge of UNCAC, staying involved in the implementation of UNCAC and to use the E-platform. There is also great potential for sustained impact in the area of regional cooperation on data exchange on asset declarations if certain steps are taken by RAI to ensure the momentum is not lost.

**Figure 14. Graph showing attitudes regarding the likelihood of Programme Outcomes (CRA and CPL) being continued in the countries in the next 3 years<sup>47</sup>**

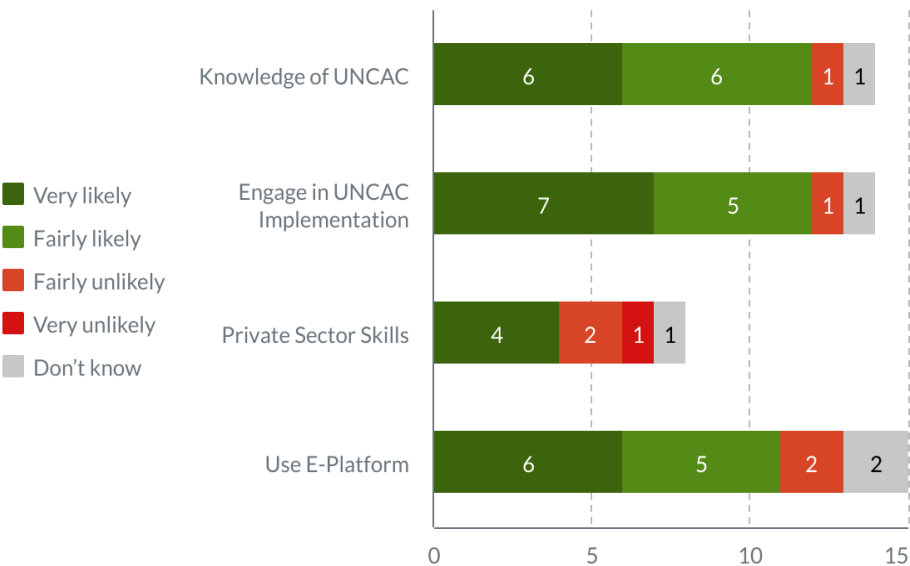


Specifically, regarding Outcomes 1 and 2, the evaluation observed that beneficiaries are committed and prepared to sustain the positive effects resulting from the Programme. For CRA, 93% of survey respondents who were involved in this Outcome said they thought it was very likely that CRA would continue to be applied in the country over the next 3 years. For CPL, this figure rises to 100%. Our field visits to BiH, Montenegro and North Macedonia revealed that indeed, CRA and CPL are now more institutionally embedded than they were at the outset of the Regional Programme and capacities have increased greatly. In the case of North Macedonia, however, further training on CPL will be necessary given the new composition of the SPCC which has led to loss of institutional memory on CPL.

It is also clear that some institutions will be more capable than others to maintain the positive effects. There is a large variance in IT capacities across beneficiary institutions and those with stronger capacities (HJPC) will certainly be prepared to maintain the momentum independently.<sup>48</sup> For other less well-resourced institutions, challenges are foreseen in maintaining implementation because their current IT capacities will not be sufficient.

Regarding Outcome 3, national institutions reported that they are keen to use the instrument and according to our survey, all 13 beneficiary respondents who were involved in Outcome 3 said that the Treaty would be either ‘very or fairly useful’ for anti-corruption work in their country. 77% (10 out of 13 respondents) see regional cooperation on data exchange as increasing (either ‘a lot’ or ‘a fair amount’) over the next five years in the region. In order for the momentum not to be lost, sustained advocacy will be needed after the signing ceremony to ensure that ratification (where required) happens quickly so that meaningful implementation is possible. The majority of beneficiaries and regional stakeholders consulted for this evaluation were strongly of the opinion that the long-term success of the Treaty will depend on it being a truly *international* tool rather than a *regional* one. As one respondent from North Macedonia stated: “Will it make a difference? It all depends on how many countries sign up and which ones and on their willingness to implement it. Keeping it in the region makes no sense though. It is only with a broad geographical reach that this tool can reach its true potential as an anti-corruption tool”.

**Figure 15. Chart to show likely future use of skills, knowledge and online networking tools gained via the UNODC’s activities in the SEE region over the course of the programme - UNODC CSO Beneficiaries<sup>49</sup>**



The UNODC activities appear to have prepared the CSOs for contributing to the country review processes, with high quality and well received trainings. That said, the ability of CSOs to sustain involvement requires both funding and capacity, which can be challenging given UNODC does not provide specific funding for CSOs to engage in the UNCAC reviews. Involvement of CSOs in the review process is also highly dependent on the political will of the focal points or the government more generally to involve civil society in the review and to implement the recommendations.

The survey of CSOs shows positive indications that once receiving the training, their input into the country review processes was useful. Of the CSOs who were involved in the Regional Programme, 8 out of 15 said that they had input into the checklist assessments for their country. Of those, 6 said that they felt their contribution was useful. Furthermore, 5 out of 14 survey respondents said that they were involved in the UNCAC country visit (3 said that there had not been an in-country visit), with 4 of the 5 who participated in the visit saying they made a useful contribution. In addition to the knowledge gained via the programme, the opportunity to network via the events - both networking between CSOs and between CSOs and national focal points, contributed to CSOs ability to sustain the positive effects of attending the training. The events offered an opportunity to build connections and make contacts around the UNCAC country reviews, as well as allowing CSOs the opportunity to partner across countries on joint-initiatives. A large majority of the CSOs surveyed (86%) think that it is either very or fairly likely that their organisation will continue to be involved in the UNCAC review process in their country in the future.

The future sustainability of the work depends on where the countries are in the review cycle. For countries which are still in the 2nd review cycle, there remains opportunities to input into the review, therefore using the knowledge and skills gained via this programme. However, this also poses a risk as a long length of time between training and being able to contribute to the review means personal contacts may get lost and knowledge forgotten. For countries which have finished the 2nd review cycle, there is a lack of clarity about what will happen next and what will be the future of the UNCAC review processes. As the trainings and events were focused more on the review processes, further capacity building of CSOs in how best to advocate for implementation of UNCAC recommendations is required to ensure long-lasting effects. Relatedly,

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as there is generally high turnover of staff in CSOs, there is a risk that institutional memory gets lost suggesting that there will be a need for future trainings by UNODC in order to maintain organisational capacity and knowledge on UNCAC.

The stage countries are at with the 2nd cycle of the review may also impact on how likely they are to continuing using the E-platform, although still 11 out of the 15 respondents reported that they were very or fairly likely to use the E-Platform in the future.

### **Were the capacities of the beneficiaries prepared for accepting the new IT tools?**

RAI, via the external IT consultancy team contracted for Outcomes 1 and 2, invested considerable time and effort to prepare the beneficiaries for implementing the new IT solutions on CRA and CPL in BiH and Montenegro. This was a first time endeavour for RAI in the area of digital solutions and indeed for some of the beneficiary institutions, and there was some ‘learning while doing’ involved. The consultancy team provided training and manuals to all institutions on the IT solutions.

During our field visits to the beneficiaries in Montenegro and BiH, the agencies suggested they may need continued support after the rollout of the tools. The variation in capacities of the institutions was clear. Respondents from APIK in particular reported that they are likely to face challenges as they have only one dedicated IT staff person and low server capacity. There is a commitment to sustain the changes but some challenges related to capacity are foreseen.

This is reflected in our survey data with 7 out of 7 (100%) of respondents who were involved with CRA IT tools of the Regional Programme stating that the tools were ‘very useful’ and likewise all 7 respondents (100%) said that it was ‘very likely’ that the CRA tool would continue to be used in the institution/country in the next 3 years. Regarding the CPL tool, the results are slightly less positive, with 5 out of 8 respondents deeming the CPL tool to be ‘very useful’, while the remaining 3 said it was ‘fairly useful’ and 6 of 8 stated it was ‘very likely’ to be applied in the next 3 years with 2 stating ‘fairly likely’. In both BiH and Montenegro, the point was made that the beneficiary agencies are not the only end-users of the tools and there were concerns about the preparedness and capacities of other implementing institutions involved in CRA and CPL.

Overall, our evaluation found that 2 out of the 3 institutions involved in the IT tools outputs of the Regional Programme, are prepared for implementation and rollout.

On the UNODC side of the Regional Programme, the E-platform for CSOs to network about UNCAC is suitable for the capabilities of the beneficiaries, and does not require specialised skills or knowledge to navigate. It was beneficial to involve the SELDI network to develop the content on the platform as well as to source and profile relevant CSOs as they have close contacts in the region, and can tailor the writing style of information to the needs of their members. The ongoing hosting of the platform by the UNCAC Coalition is a logical venue, as it is consistent with platforms for CSOs in other regions which are also hosted by the site, and given the mandate of the organisation, hosting this information on their site helps to garner organic traffic to the platform via the UNCAC Coalition’s main site.

### **Did the generated regional dialogue have an impact on change process, and to what extent?**

Several forms of regional dialogue were generated through the Regional Programme from informal networking at events and trainings organised under the Programme to formal regional negotiations regarding Outcome 3’s Treaty on Data Exchange. All were lauded by respondents as extremely beneficial, providing opportunities for exchange of experiences and knowledge-sharing. For Outcome 3, the success of the Outcome relied heavily upon the nature and quality of the

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regional dialogue. According to respondents who were involved in the Treaty negotiations, the regional dialogue between the beneficiary countries was constructive and cooperative. The dialogue was inclusive and comments were taken on board and contributed to improving the final text.

One point to note with regard to the negotiations was that while the process was generally seen as having been successfully mediated by RAI and the expert consultants, some involved parties noted that the voting procedure on which country should be the depository was somewhat spontaneous, ad hoc and could have been formalised better to avoid the political sensitivity of members publicly voting for or against their neighbours and the potential for this to be misinterpreted as a political statement.

The UNODC's convening of workshops and trainings was identified as a very worthwhile endeavour for the region. While some participants did not require UNCAC trainings specifically as they already were very experienced (or for one private sector attendee that, they are not involved in anti-corruption), the overwhelming impression was that it provides a unique opportunity for CSOs, government representatives and private sector to meet, to stay relevant in the regional anti-corruption decisions, and to share best-practice and experiences. The involvement of CSOs in the UNCAC review process is seen as highly important by the CSO beneficiaries to improve accountability and transparency around the review process, which would otherwise be lacking. As noted by one CSO Beneficiary from North Macedonia: *"If there is no civil society involvement and if there is no pressure to make the process transparent and inclusive then we cannot really maximise the potential impact of the convention and then the convention will not really become an engine of reform that we think it should be given the vast amount of resources and energies that people invest in the convention and the review mechanism"*.

That said, the inclusion of CSOs in the country reviews is very much dependent on political will and this evaluation is unable to attribute this solely to the regional dialogue from this programme of work, given some focal point's willingness to engage CSOs existed before the programme began, as well as some engaged CSOs in the programme having being involved in their country review previously.

### **Were there any unintended consequences of the Programme?**

Overall the Regional Programme was implemented largely in line with the foreseen logframe and there were no unintended negative consequences reported. Some positive unintended consequences are however observable:

- Regarding Outcome 1, in BiH, the inclusion of HJPC as an additional beneficiary in the programme was not foreseen and largely seen as a success, broadening the reach of the CRA IT solution and strengthening the relationship between RAI and an important anti-corruption institution in BiH.
- Regarding Outcome 3, the Treaty on Data Exchange was originally foreseen by RAI as a regional instrument, but the Treaty's potential as an international legal instrument emerged over the course of the Programme and is seen by many as a very promising international tool for anti-corruption.
- Regarding Outcome 4, the trainings and workshops themselves facilitated networking between governmental experts/ focal points and CSOs, which was not specifically noted in the log frame. This was seen as a major benefit of attending the events.
- Regarding Outcome 5, the trainings also built the capacity of private sector attendees around anti-corruption and UNCAC. A business sector stakeholder reported passing back information from the trainings to their company's compliance team.

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## **Efficiency**

**The project supported 23 state beneficiaries and the capacity building of 73 CSO representatives from 57 organisations, with a relatively modest overall budget of 1 million euro. Overall, the project finances were well-managed and the budget was largely realistic. Regarding the timeframe, some adjustments were necessary. The need for 2 no-cost extensions, requested in 2019 and 2020, related to Outcome 3 of the RAI objectives. The initial request, which was partially avoidable, was due to delays caused by internal staff changes at RAI and an underestimation of the time needed for the process of treaty negotiation. The second request (2020) was unavoidable and linked to the COVID-19 global health crisis which necessitated postponing the signing ceremony of Outcome 3.**

### **Was the Programme timeframe and budget realistic?**

Regarding Outcomes 1-3, the Programme budget was largely deemed by regional stakeholders and national beneficiaries to be sufficient for the planned activities. The evaluation identified two areas where additional budget allocations may have been beneficial for the RAI activities: IT tools and Monitoring and Evaluation. Additional resources for more comprehensive monitoring and evaluation through the Regional Programme would have aided in getting a fuller picture of the beneficiaries' follow-up after activities and the ongoing impact of the interventions. Regarding IT tools, our interviews with regional and national stakeholders indicated a tight budget, given the tasks that eventuated. Even though the IT tools only ended up being implemented across 3 institutions in two countries rather than in the 4 jurisdictions originally foreseen, the budget was deemed tight as the specifications developed into something much more elaborate than envisaged. More time and resources for the development of the initial specifications would have aided efficiency later on.

Regarding the timeframe for Outcomes 1 and 2 it was largely sufficient (apart from the IT tools which would have benefitted from more time being devoted to specifications in the earlier stages), but Outcome 3 was very ambitious, and the timeframe was inadequate. There was an issue with a change of management at the RAI Secretariat early in the Regional Programme, which led to some time being lost on Outcome 3. However, most of the delay was simply due to an underestimation of the time needed for the undertaking: for the programme countries to collectively draft, negotiate, agree on, sign, have ratified and implement such an international treaty in the given timeframe was ambitious but, in hindsight, unrealistic. As one regional stakeholder noted: *“there were attempts to undermine it, which lost us time, but which is also an indicator of the strength of this tool and its potential. From the RAI side, perhaps there could have been more pro-activity in keeping up the pace”*. A national beneficiary stated that *“an international treaty is simply time consuming. There are lots of formalities regarding the process and the negotiations. Perhaps we all underestimated that a little at the outset. There were people who were very skeptical of how possible it was to achieve an international treaty within that time frame, but we see it was indeed possible, even with a slight delay.”*

Regarding Outcomes 4-6, the timeframe was largely sufficient. UNODC organised and held all their planned trainings and workshops within the originally planned timeframe, and the no cost-project extension was not needed by the UNODC as work has been completed. The number of days allocated for the workshops was sufficient to cover the large amount of material for participants, while not being too long which may have prevented attendees from attending. One of the business sector interviewees noted that, for them, the conference was slightly long as for the business community, it is important to keep events short and succinct to ensure they are not prevented from attending. The unforeseen delay in the country review processes for some countries has meant that opportunities for CSOs to engage will be impacted.



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The budget available for delivering the workshops and events was broadly sufficient. Attendees reported that the events were well organised and cost for travelling to the events (including travel costs and per diems) were covered which helped ensure a broad participation. However, post-training follow-up activities for CSOs to conduct in-country trainings were not funded by the UNODC, with the CSOs expected to cover such activities from their own budget. While this was possible for some well-funded, high capacity CSOs, not all of those who participated in the trainings had the budget or staffing to engage in follow-up work.

**Were any bottlenecks identified in the implementation of the programme and how could they have been avoided?**

There were few bottlenecks identified when assessing the implementation of the Regional Programme activities. Early in the implementation, there was a change of management at RAI, which led to some delays. It was noted that, as the UNDOC did not require the no cost contract extension, as all planned activities had taken place. This created a gap between when activities took place and when this final evaluation was conducted, which was less than ideal as some of the CSO staff have since moved on from their roles. It was noted that there was a lack of clarity between who has the final say over the E-platform design and content - UNODC or the UNCAC Coalition. This caused minor issues in the development of the website. Furthermore, one UNCAC focal point reported that they did not receive an invitation to one of the training events until after the event had passed. This was because the invitation was sent to a different department first, and they were notified too late.

**Was the Programme team adequate to deliver the implementation process?**

All RAI beneficiaries praised the RAI Secretariat for their professionalism, responsiveness and competence in managing the Regional Programme. Their flexibility was valued and communication lines were always open. Capacities in the areas of communications and advocacy could be strengthened to ensure greater visibility and follow-up. As a regional stakeholder commented, *“more in-country follow-up after activities would have been welcome to encourage the agencies to maintain the momentum after a training, for example. Sometimes it felt like there wasn’t much follow-up to see how things were being implemented afterwards”*.

Likewise, UNODC interviewees noted that the UNODC project team were responsive and highly supportive when answering questions during the follow up stage. That said, many interviewees noted the lack of in-country coordination of follow-up activity, and have suggested that greater involvement or regular communication by the UNODC CST (or other partners) would help maintain momentum for the process after the trainings. Some administrative support for the programme was provided by the broader SEE team, which could be budgeted for in the future within the project budget itself. While budget, staffing and time for the creation and launch of the e-platform was sufficient, the Regional Programme did not include staffing for on-going maintenance, specifically communications or coordination staff who could help mobilise discussions on UNCAC and gather and share information about what is happening with the country review processes. External communications support to raise broader awareness of the Regional Programme with external stakeholders and the general public was also missing.

**Has the cooperation among Programme partners (RAI and UNODC) been successful?**

Both partners spoke very positively about working with one another. It is clear that both organisations have excellent reputations in the region and their comparatively different areas of focus and years of establishment offer the opportunity of complementary knowledge sharing. The UNODC with extensive experience of large multi-country projects, offered RAI an established professionalised way of working and project management. Capitalising on its regional network and knowledge, RAI was able to suggest suitable attendees to UNODC for the workshops which helped ensure a broad range of relevant experts were present. UNODC was invited, and attended, the RAI negotiations around the International Treaty.

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Some of the experts at the negotiations had also been trained at the UNODC events, so this offered a further networking opportunity. However, RAI themselves were not highly visible at the UNCAC workshops and trainings, and this partnership was generally unknown by many beneficiaries and stakeholders.

Thus, given the programme design and the quite separate nature of the objectives each partner was working on, there is recognition that there was not as much synergy across the areas of work as could have been achieved with a revised design. The Regional Programme remained as one of two halves. For future efforts, it would be preferable to leverage better the combined state and civil society actor approach and develop more crossover between the programme objectives and activities.

### **Cross-cutting themes including Gender & Social Inclusion**

**The programme of work demonstrated the inclusion of both men and women in project activities throughout, including achievements related to RAI revising its ways of working and internal policies related to gender, and RAI events mentioned the equal representation of genders which helps promote gender equality within the beneficiary organisations. UNODC had very high participation of women in all its events of between 55% and 70% of CSO attendees being female, this reflects that female representation within CSOs in the region is already very strong.**

#### **Did the Regional Programme safeguard an inclusive participation and equal representation?**

The Regional Programme design and logframe included clear targets on balanced gender representation (30% female representation) in capacity building activities and trainings. For its part, RAI encouraged this through a policy of equal representation of genders being mentioned in all invitations, which was noted by many interviewees at the national level, an indicator of the success of this at least at the awareness-raising level. The gender balance at events was achieved and participation targets were exceeded.

While women are generally quite active in the anti-corruption institutions in the region, one specific ambition of RAI was that in Outcome 1 and 2, at least one gender focal point or gender specialist from national authorities would be involved in the programme activities. The national beneficiaries did not have dedicated gender focal points in the national institutions, as was originally foreseen, and these were not established over the course of the Programme. While the inclusion of this indicator was a laudable ambition and beneficial for awareness-raising among the institutions of this gap in their structures, the regional context was not conducive to its achievement.

Internally at RAI, a gender consultant trained the staff on gender awareness. This was a mixed success, with some participants engaging fully and others not buying in substantially to the objectives. The focus on gender and social inclusion did lead to substantial changes to the ways of working and the policies of the organisation, including maternity and other gender-sensitive policies. This was a huge plus for the organisation and it would not have been achieved without the project.

The events and trainings organised by UNODC had a high participation and involvement from women, and far exceeded the target of 30% attendance by women, with between 55% and 70% of attendees for each workshop being female. Women head many of the CSOs in the region, and female attendees were also present from the private sector and the government. It was noted by attendees of the events that discussions involved both comments and questions from male and female attendees, with women making constructive contributions and the dialogue being reported as open. The panels and presenters also included a number of female experts, while some CSOs who attended the trainings were working on

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women's issues and a representative from a 'women in business' group also attended the private sector events, helping to further inclusive participation.

Inclusive participation was also expanded by the involvement of a broader range of CSOs at the trainings including those working on drugs, human trafficking and youth due to the applicability of the UNCAC chapter on prevention for such groups. It was also noted that including CSOs from Kosovo\* even though it is not a UNCAC signatory helped encourage a more inclusive regional dialogue.

### **Has the multi-stakeholder dialogue on policy discussion and development improved? Become more inclusive?**

RAI beneficiaries noted that while there is quite a high percentage of women working in anti-corruption institutions in the region, the issue of gender awareness and inclusion is still underdeveloped in the region and it was not seen as a priority for most RAI beneficiaries interviewed for the evaluation. There are, however, some anecdotal indications of positive contributions of female participation in the UNCAC review processes from the evaluation survey:

- When asked if they had contributed to the checklist assessment for their country, 5 out of 9 women said that they had contributed, compared with 3 of 6 men who took the survey, with 80% of women who said they contributed to the checklist said that they made a useful contribution.
- When asked if they had contributed to the in-country visit, 2 out of 8 women survey respondents who said that they had, compared with 3 out of 6 men. Both women reported that their contribution to the country visit was fairly useful.
- And when asked about the quality of their communication with government, 5 out of 9 female respondents said that the dialogue with government has been open and constructive.





### **Has the Regional Programme been focused on identification and reduction of existing barriers?**

Within RAI, the Regional Programme spurred improvements to internal policies in terms of gender-awareness and this should be considered a key achievement related to gender and inclusion. As one regional stakeholder commented: *“RAI went from being Gender-blind to being Gender-aware. For the first time, this issue truly came onto RAI’s agenda and the internal policy reforms are very welcome”*. This is important also as it sets the tone for member states who may be inspired by RAI’s progressive moves in this area.











For the implementation of the UNODC activities, to a certain extent, the programme has helped reduce existing barriers by ensuring good participation by women from CSOs at events and conferences, as well as expert presenters, helping to give greater visibility to their voices in discussions and helps contribute to a more inclusive review process for the 2nd cycle of the UNCAC review. That said, it appears that there was already strong representation of women in CSOs in the region so this was not necessarily an outcome of the UNODC’s work but rather a reflection of the regional context. It was not evident in the review that prior identification of barriers had been undertaken and whether the project responded to that as such.







## 6. Conclusions

The following table summarises the key findings of this evaluation with reference to the evaluation questions agreed in the inception phase and detailed in the ‘evaluation questions, indicators and sources of verification’ table presented in Annex 9 of this report. This summary table should be read with reference to the more detailed findings on evaluation questions and sub-questions in the preceding chapter.

Evaluation Conclusions		
Relevance		
	RAI	UNODC
How well was the Regional Programme designed to adjust to changing circumstances in SEE over its lifetime?	 The design of the RAI activities built in a certain degree of flexibility to allow for adaptation to changing circumstances over its lifetime.	 There is evidence that activities were able to adjust to changing circumstances in the region - utilisation of partners in the content creation of the workshops is helpful
To what extent are the objectives of the Programme in line with the national strategies and priorities?	 RAI Outcomes found to be very much in line with national strategies and priorities. This was helped by the RAI Steering Committee providing an ear to the ground in the member countries and aligning activities with national priorities.	 The UNODC area of work was seen as highly relevant for the region. Engagement on UNCAC was relevant by all CSOs trained for their strategies. Working with the private sector less so, but still overall welcomed
Did the Partners understand the context and pre-conditions that would have ensured that the change is sustainable and long-term?	 RAI generally displays a deep understanding of the context in which its beneficiaries operate. Areas for improvement: understanding varying needs and capacities re: IT tools and understanding the scale, scope and time required for negotiating, signing and implementing an International Treaty (Outcome 3).	 UNODC did, to a certain extent, understand pre-conditions particularly related to capacity building CSOs and supporting them via networking to engage in the UNCAC reviews. Areas for improvement: barriers to conducting in-country trainings, the context of private sector engagement and barriers to joint advocacy/campaigns, ongoing E-platform maintenance, and lack of political will/focal point capacity.
Was the programme design coherent and the pathways for impact (theory of change) well-articulated?	 The internal Theory of Change logic for each Outcome clear. While the overall goal of the Regional Programme was well defined and the activities clearly stated about how they would contribute - some issues were found with the logical pathways (especially with regard to connections between Outcomes). The risks of lack of political will, capacity issues within the ACAs and general high levels of corruption in the region were not given prominence in the theory of change. Areas needing better articulation: Pathways of change regarding to CRA and CPL being meaningfully implemented; trained CSOs being able to contribute meaningfully into the country review, being able to deliver their own trainings and working with the private sector on joint media campaigns and advocacy. On UNODC side, the lack of funding for follow up activities for CSOs created challenges for low-resourced, understaffed CSOs. Only limited risks were identified prior to the project beginning and mitigation strategies were not always clearly defined. A lack of coherence between the annual targets for Objective 4 regarding number of CSOs trained and the overall total number of CSOs trained was found as the annual targets do not specify whether duplication is allowed.	

Effectiveness		
To what extent were the 6 objectives/outputs of the Programme achieved?	 Outcomes 1 and 2 achieved (some outputs delayed but on course for achievement). Outcome 3 substantively achieved although formally the signing ceremony has had to be delayed.	 Outcomes 4 and 6 have been largely achieved, with CSOs reporting improved capacity to contribute to UNCAC reviews and to do trainings in their own countries, better networks reported and the E-platform being used for the intended purpose. Outcome 5 is partially achieved with the majority of survey respondents who attended the trainings saying their skills to work with the private sector increased as a result. There is little evidence of CSOs getting increased resources as a result of the trainings. Some examples of engagements with the private sector are found, however, the advocacy or media impact of these engagements is generally limited.
What were the major factors which influenced the achievement or non-achievement of the Regional Programme?	 Factors that helped: RAI's deep knowledge of the national beneficiary contexts, flexibility to include unforeseen institutions as beneficiaries, professional and responsive Regional Programme team at RAI, excellent external consultants and trainers, country-specific, tailored approach to trainings, excellent experts for the development of the International Treaty text and leading negotiating process, involvement of Austria as host of Treaty negotiations.	 Factors that helped: well-organised and well-resourced trainings and workshops with sessions that were relevant and useful particularly for the CSO attendees, the responsive team at the UNODC has helped answer CSOs questions in a timely manner about the review process, and the engagement of partners - the SELDI network and the UNCAC Coalition, helped ensure activities and outputs were responsive to the needs of the CSOs from the region.
	 Factors that hindered: Varying capacities of beneficiary institutions, unforeseen national institutional changes, insufficient time and resources allocated to the development of specifications for the IT tools, underestimation of the complexity and time needed to negotiate and implement an International Treaty.	 Factors that hindered: lack of funding/capacity for follow up activities, lack of coordination of follow up activities, lack of clarity on who would lead, no communication coordination to drive traffic to the E-platform, challenging context for private sector engagement in anti-corruption and challenges with political will/ capacity of government focal points.
Were the capacities of the beneficiaries prepared for accepting the new IT tools?	 Partially. 2 out of 3 beneficiary institutions evaluated as ready to implement the IT tools fully and effectively.	 The beneficiaries skills are sufficient to use the platform. However, capabilities of the stakeholder partner managing the platform were lacking for maintenance.
To what extent are the beneficiaries capable and prepared to maintain the positive effects of the development interventions without support in the long term?	 Many results achieved by the Programme show a high likelihood of sustainability.	 Partially. The beneficiaries report likelihood to use UNCAC knowledge in future, as well as to stay engaged in implementation. Many also report plans to use E-platform in future. Only half who attended private sector trainings say they are likely to use these skills in the future.

<p>Did the generated regional dialogue have an impact on change process, and to what extent?</p>	<p> All forms of dialogue promoted by the project were lauded by beneficiaries as extremely beneficial, providing opportunities for exchange of experiences and knowledge-sharing.</p>	<p> A major success of the trainings and events was providing beneficiaries and stakeholders from different countries with the opportunity to share experiences and knowledge.</p>
<p>Were there any unintended consequences of the Programme?</p>	<p> Only positive unforeseen consequences were noted. Regarding Outcome 1, in BiH, the inclusion of HJPC as an additional beneficiary in the Regional Programme was not foreseen and largely seen as a success, broadening the reach of the CRA IT solution and strengthening the relationship between RAI and an important anti-corruption institution in BiH. Regarding Outcome 3, the Treaty on Data Exchange was originally foreseen by RAI as a regional instrument, but the Treaty's potential as an international legal instrument emerged over the course of the Regional Programme and is seen by many as a very promising international tool for anti-corruption.</p>	<p> Only positive unforeseen consequences were noted. Regarding Outcome 4, the trainings and workshops themselves facilitated networking between focal points and CSOs, which was not specifically noted in the log frame. Regarding Outcome 5, the trainings also built the capacity of private sector attendees around anti-corruption and UNCAC. A business sector stakeholder reported passing back information from the trainings to the company's compliance team.</p>
<p><b>Efficiency</b></p>		
<p>Was the Programme timeframe and budget realistic?</p>	<p> The budget was sufficient and well-managed. The timing was insufficient for the IT solutions (Outcomes 1 and 2) and for Outcome 3.</p>	<p> The budget and staffing were realistic for the planned activities, but no budgeting for the follow up activities which would have been useful to improve the effectiveness of the Regional Programme.</p>
<p>Were any bottlenecks identified in the implementation of the programme and how could they have been avoided?</p>	<p> Change in RAI management early in the Regional Programme and other changes in key RAI staff led to some inevitable delays in decision-making and may have particularly delayed Outcome 3.</p>	<p> Only minor bottlenecks were reported. UNDOC did not require the no cost extension creating a gap between completing work and this evaluation. Some uncertainty between who has the final say over the E-platform design and content - UNODC or the UNCAC coalition. One focal point noted they received an event invitation after an event had occurred, due to the invitation being sent to a different government department.</p>
<p>Was the Programme team adequate to deliver the implementation process?</p>	<p> All RAI beneficiaries praised the RAI Secretariat for their professionalism, responsiveness and competence in managing the Regional Programme. Their flexibility was valued and communication lines were always open. Capacities in the areas of communications and advocacy could be strengthened.</p>	<p> Partially - the UNODC team was responsive and helpful with follow up email communication, and the events were seen as very well organised. Planning for administrative support, ongoing maintenance/comms support for the e-platform, coordination of follow up activities, and external communications of the Regional Programme more generally would have helped improve outcomes.</p>

<p>Has the cooperation among Programme partners (RAI and UNODC) been successful?</p>	<p> Both organisations spoke highly of each other and enjoyed open communication and good cooperation at the Regional Programme team level. However, given the programme design and the quite separate nature of the objectives each partner was working on, there is recognition that there was not as much synergy across the areas of work as could have been achieved with a revised design.</p>	
<p><b>Cross-cutting Themes</b></p>		
<p>Did the Regional Programme safeguard an inclusive participation and equal representation?</p>	<p> Targets regarding gender-balanced participation in activities were exceeded. Further work in the region could look to increase focus of presentation on corruption risks which have a greater impact on women (education, health services and spending of public funds).</p>	
<p>Has the multi-stakeholder dialogue on policies discussion and development improved? <i>Become more inclusive?</i></p>	<p> RAI beneficiaries noted that while there is quite a high percentage of women working in anti-corruption institutions in the region, the issue of gender awareness and inclusion is still underdeveloped in the region and it was not seen as a priority for most RAI beneficiaries interviewed for the evaluation.</p>	<p> UNODC events achieved high participation from female representatives from the beneficiary organisations, far exceeding the target of 30% representation. A wider range of CSOs were included at events including those looking at women’s rights, youth, drugs and human trafficking. Kosovo’s* inclusion at events was mentioned as supporting a more inclusive dialogue.</p>
<p>Has the Regional Programme been focused on identification and reduction of existing barriers?</p>	<p> RAI internal policies and procedures have become more gender-sensitive as a result of the Regional Programme. At the awareness-raising level, the Programme promoted a more inclusive process (through gender mentions in invitations etc., which was noted by beneficiaries)</p>	<p> Partially. UNODC collected data throughout on the participation of women at its events, and by having high participation of women at events, this contributes to the reduction of existing barriers. However, this high attendance reflects the already high number of women in CSOs in the region, rather than due to specific actions taken by the project. Little evidence is found for identification of barriers.</p>

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## 7. Recommendations

This chapter outlines the main recommendations arising from the evaluation, which, if acted upon, can help to improve future programming, in particular the follow-up Regional Programme which is currently being designed to build upon the results of the existing one.

### 1. Place greater emphasis on monitoring and promoting implementation of anti-corruption policies and initiatives

- ❖ For RAI: Future programming should recognise the ongoing implementation gap - new approaches have been introduced (CRA and CPL) but the focus now should be on pushing for implementation, rather than rollout of more tools.
- ❖ For RAI: RAI should engage more at the political level to increase political will for implementation and to mitigate against changes at the lower institutional levels leading to loss of institutional knowledge.
- ❖ FOR UNODC: Give greater focus in building political will for a transparent and accountable UNCAC review process. Call for greater engagement of CSOs by Member States in the reviews and call for clear, open, and constructive dialogue when responding to CSO recommendations. Encourage Member States to publish the full reports from country reviews on the designated UNODC webpage.
- ❖ For UNODC: Maintain communication with CSOs about the status of the 2nd review cycle and outcomes of discussions about what will happen after the 2nd cycle is completed.

### 2. Plan and promote greater synergies between the two implementing partners

- ❖ For both RAI and UNODC: Regional Programme design should have crossover activities to capitalise on RAI's strong network of State partners and UNODC's civil society focus allowing for top-down and bottom-up pressure for change.
- ❖ For both RAI and UNODC: More profiling of the partnership at UNODC and RAI events.
- ❖ For both RAI and UNODC: More visibility of RAI at the UNODC workshops and trainings via presentations, speeches or inclusion in panel discussions.

### 3. Invest more in partnerships with other stakeholders in the region

- ❖ For RAI: RAI can do more to establish and maintain strong relationships with other international organisations in the region, such as GRECO, OECD, WB, UN, USAID and other donors, as well as with CSOs with shared objectives who are allies can ultimately act as advocates for RAI.
- ❖ For UNODC: UNODC should engage in dialogue with the UNCAC Coalition, SELDI and other relevant networks about increasing the strategic value of the partnerships, and future roles and responsibilities. These partnerships offer significant value to the UNODC due to their mandates and geographical coverage. Involvement of a CSO partner/s during the planning stage of future programme work could lead to greater opportunities and synergies across different work streams.

### 4. Review the programme logic and monitoring and evaluation approach

- ❖ For both RAI and UNODC: Impact monitoring and evaluation needs strengthening for future Programming.
  - For RAI, this means there is a need for beneficiaries to move beyond the drafting of CRA integrity plans to monitoring impact of CRA/Integrity plans. RAI should consider a full impact assessment specifically on



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- CRA and CPL in the region, with a view to understanding the conditions under which real downstream impact is achieved.
- For UNODC, this means a greater focus on outcome-based indicators related to the change the programme is trying to achieve. Engage in extensive planning to ensure that activities, outputs and outcomes follow a logical transition and are informed by an analysis of the context and needs of the beneficiaries. This is particularly relevant for work engaging the private sector as this is a newer area of work.
  - ❖ For both RAI and UNODC: Engage in a detailed risk assessment during the project planning stage involving different partners and selected beneficiaries for input. Develop detailed approaches to how risks will be responded to, and the relative risk and impact level the risks would have to the programme, if experienced.
  - ❖ For both RAI and UNODC: Both organisations need to establish a streamlined but comprehensive monitoring, evaluation and learning system to gather (as real-time as possible) insights from beneficiaries and stakeholders on follow-up actions and impacts of the interventions.
  - ❖ For both RAI and UNODC: For the next Regional Programme, a mid-term evaluation should be included in the overall Monitoring, Evaluation and Learning plan, in order to identify barriers to success early and allow for course-correction during the second half of the Programme.

#### **5. Technological solutions need revised approach to planning and roll-out**

- ❖ For RAI: If engaging further with digitalisation in future Programming (which is certainly relevant for the beneficiaries), greater time and effort should be invested in developing detailed and end-user-focused specifications.
- ❖ For UNODC: Engage in an end-user focused feedback review of the content, layout and usability of the E-Platform to ensure that it stays fit for purpose and meets the needs of the beneficiaries. Undertake user testing research to gather feedback on what works and what does not work. Plan for appropriate staffing to maintain engagement with the site and update content (including gathering content from beneficiaries and stakeholders). Look to other communication channels (including social media, emails and newsletters) to drive wider audiences to the site.
- ❖ For UNODC: Broaden monitoring data collection for the E-Platform using Google Analytics so that changing levels of engagement with the platform can be analysed and better understand what content proves most popular.

#### **6. Continuing with UNODC trainings - review the style, content and groupings**

- ❖ For UNODC: Ensure that UNCAC content provided at the trainings is comprehensive, detailed and informative to meet the needs of an engaged and experienced audience. Given the value-added of these workshops is providing a unique opportunity for learning about the Convention, maintain appropriate coverage on this during the sessions. Briefings either as documents or webinars, could be provided prior to the events to ensure that inexperienced attendees are familiar with the basics.
- ❖ For UNODC: Provide thematically tuned training content depending on the issues identified from the 2nd cycle review period. Engage the private sector particularly on themes particularly relevant for the business community.
- ❖ For UNODC: Organise future trainings specifically to support CSOs to push for implementation of UNCAC recommendations and for monitoring progress.

#### **7. Ensure the Treaty on Data Exchange is promoted and adopted internationally**

For RAI: For the International Treaty on Data Exchange to reach its full potential, RAI should develop and implement a sustained advocacy strategy to promote uptake and use of the Treaty in and beyond the region. The

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delay posed by the COVID-19 global health crisis can be used to clarify and respond strategically to the EU position on the Treaty and encourage more States to sign up at the signing ceremony in Vienna. The number of initial signatories will send a strong signal of the Treaty's value.

#### **8. Place greater focus on post-activity follow up and advocacy**

- ❖ For RAI and UNODC: In order to maintain the momentum built from the work done so far, the next phase of this programme should begin as soon as possible following the end of the current phase.
- ❖ For RAI: Future Programming should include more activities on post-intervention follow-up to sustain the momentum and promote meaningful impact.
- ❖ For UNODC: Include during the trainings discussions around next steps, with clear plans, action points and deadlines (with people assigned for tasks) for what to do next to apply the lessons from the workshop back in the beneficiaries' countries.
- ❖ For UNODC: Utilise "agents of change" or anti-corruption champions within each country to mobilise engagement around the UNCAC review in each programme country. Also explore opportunities for giving small grants to beneficiaries so that they can do follow up activities after the workshop, based on a needs assessment.
- ❖ For UNODC: Consider either the UNODC or a partner organisations (such as SELDI network or UNCAC Coalition) playing a coordinating role for in-country follow up work. Convening regular group telephone calls of beneficiaries in a country or arranging national visits to improve knowledge sharing and maintaining momentum for the review process.

#### **9. Adopt a more sectoral approach to allow targeted capacity-building**

- ❖ For RAI: Beneficiaries and external stakeholders favour moving in the direction of a sectoral approach allowing more focused interventions in particular corruption hot-spots (Judiciary, Healthcare etc.). RAI should work with anti-corruption agencies to identify the sectors where the needs are highest and where the most impact can be achieved. RAI should identify and target "integrity leaders" within specific sectors (for example HJPC for the Judiciary in BiH) and work with them to design and provide tailored interventions for their specific sector.
- ❖ For UNODC: If greater focus is given in future to the implementation of UNCAC rather than the review process, consider a sectoral approach to engaging a wider range of government departments which have corruption risks. This would also broaden the range of CSOs who could be engaged via the Regional Programme (including more engagement of women's rights organisations, or CSOs working on corruption issues that impact women the greatest i.e. healthcare and education).

#### **10. Invest in Communications, PR and Advocacy capacity**

- ❖ For RAI and UNODC: Both organisations can do better with regard to external communications and PR, for example by expanding the social media presence messaging. For future programming, an Advocacy and Communications Strategy should be developed and updated throughout implementation with options for joint advocacy and communications between the two organisations where possible.

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## 8. List of Annexes

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## 9. Endnotes

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<sup>1</sup> Henceforth it will be listed as Kosovo\*. The asterisk refers to the following footnote: 'This designation is without prejudice to positions on status, and is in line with UNSC 1244 and the International Court of Justice Opinion on the Kosovo Declaration of Independence.'

<sup>2</sup> The two surveys were sent to all 47 RAI beneficiaries and all 73 UNODC CSO beneficiaries. Response rates were 55% (RAI) and 21% (UNODC). Responses were received to the RAI survey from beneficiaries from all participating countries, while for the UNODC survey responses were received from beneficiaries from all countries with the exception of Kosovo\*.

<sup>3</sup> As per the UNCAC review process, each State party assigns a focal point to coordinate its participation in the review, someone who has substantive expertise on the provisions of the Convention under review. The work of the UNCAC focal point is supported by governmental experts.

<sup>4</sup> See Annex 10 for profiles of the evaluation team members.

<sup>5</sup> Transparency International (2019) Corruption Perceptions Index, accessible @ <https://www.transparency.org/cpi2019> and previous issues of same.

<sup>6</sup> See for example Imeri, A. A. et al., (2018). The (in)effectiveness of EU benchmarking mechanism in the Western Balkan. Reforming from the Bench - Marking offside. Skopje: European Policy Institute (EPI). <http://ten.europeanpolicy.org/wp-content/uploads/2018/03/Inside-Regional.pdf> ; Imeri, A. A. and Ivanovska, A. (2016). Sitting on the bench and marking – how effective?; Unger, T. (2018). Keeping the promise: Addressing impunity in the Western Balkans. Utrecht: Impunity Watch. [https://www.impunitywatch.org/docs/Keeping\\_the\\_Promise\\_%5BFINAL%5D.pdf](https://www.impunitywatch.org/docs/Keeping_the_Promise_%5BFINAL%5D.pdf)

<sup>7</sup> Transparency International (2016) Fighting Corruption in the Western Balkans and Turkey: Priorities for Reform, accessible @ <https://www.transparency.org/whatwedo/publication/7481>

<sup>8</sup> OSCE (2019) 'Trial Monitoring of Corruption Cases in Bosnia and Herzegovina: Second Assessment', accessible @ <https://www.osce.org/mission-to-bosnia-and-herzegovina/417527>.

<sup>9</sup> Institute for Economics and Peace (2019) Global Peace Index (2019), accessible @ <https://reliefweb.int/sites/reliefweb.int/files/resources/GPI-2019-web003.pdf>

<sup>10</sup> Freedom House (2019) Freedom in the World: Democracy in Retreat, accessible @ <https://freedomhouse.org/report/freedom-world/freedom-world-2019> (and previous issues of same)

<sup>11</sup> See, for example, Kmezic, M. and Bieber, F., 2017. And Reporters Without Borders' 2019 World Press Freedom Index report, accessible @ <https://rsf.org/en/ranking>

<sup>12</sup> The European Commission's 2017 'Monitoring report of the 'EU Guidelines for Media Freedom and Media Integrity 2014-2020'' also finds media freedom lacking, stating that 'political and economic power centres are seizing control over the media, ignoring the public interest and preventing media freedoms' in the region. However the same report indicates that investigative journalism is the bright side of media sectors in the Balkan countries. The report notes that across the region, 'investigative journalism is most often practiced in specialized CSOs or similar independent entities that produce investigative stories, which are then published on their online platforms or in mainstream media.' Indeed the region boasts some very dedicated and experienced CSOs on anti-corruption in the region, showing high commitment to participate in anti-corruption work, which is a major opportunity for the Regional Programme.

<sup>13</sup> See Annex 8 for a summary graphic of key socio-political trends in the region during the Regional Programme timeline.

<sup>14</sup> Friedrich Ebert Stiftung (2018), 'Political Trends & Dynamics. Gender Politics in Southeast Europe' available @ <http://library.fes.de/pdf-files/bueros/sarajevo/12902/2017-12-2018-01.pdf>

<sup>15</sup> Lilyanova, Velina (2018) 'Women in the Western Balkans: Gender equality in the EU accession process' available @ [https://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS\\_BRI\(2018\)625139](https://www.europarl.europa.eu/thinktank/en/document.html?reference=EPRS_BRI(2018)625139) European Parliamentary Research Service.

<sup>16</sup> Friedrich Ebert Stiftung (2018) Ibid.

<sup>17</sup> European Commission (2017) 'A credible enlargement perspective for and enhanced EU engagement with the Western Balkans' available @ [https://ec.europa.eu/commission/sites/beta-political/files/communication-credible-enlargement-perspective-western-balkans\\_en.pdf](https://ec.europa.eu/commission/sites/beta-political/files/communication-credible-enlargement-perspective-western-balkans_en.pdf)

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<sup>18</sup> While some activities were conducted in Bulgaria, Croatia and Romania, these countries were not included in this evaluation as they are not funded by ADA.

<sup>19</sup> Outcome 3 will officially be completed when the signing ceremony for the International Treaty has taken place. This was planned for March 2020 but has been postponed due to the COVID-19 global health crisis, until June 2020, and so this final activity could not be covered by the evaluation.

<sup>20</sup> See Findings chapter, section on 'Relevance' for further details on this.

<sup>21</sup> See for example: European Commission (2017) 'A credible enlargement perspective for and enhanced EU engagement with the Western Balkans' available @ [https://ec.europa.eu/commission/sites/beta-political/files/communication-credible-enlargement-perspective-western-balkans\\_en.pdf](https://ec.europa.eu/commission/sites/beta-political/files/communication-credible-enlargement-perspective-western-balkans_en.pdf) and European Parliament Briefing (2017) 'Anti-corruption efforts in the Western Balkans'. Available @ [http://www.europarl.europa.eu/RegData/etudes/BRIE/2017/599417/EPRS\\_BRI\(2017\)599417\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2017/599417/EPRS_BRI(2017)599417_EN.pdf)

<sup>22</sup> OECD (2018) 'Competitiveness in South East Europe', available at <https://www.oecd.org/publications/competitiveness-in-south-east-europe-9789264298576-en.htm>.

<sup>23</sup> Source: Survey of RAI beneficiaries. N=25. Results combined from two survey questions. Q: Thinking back to 2016, when the Regional Programme started, to the best of your knowledge, how relevant, if at all, would you say that the following activities were for your national strategy or priorities to fight corruption? And Q. And thinking about now in 2020, how relevant, if at all, would you say that the following activities are now for your national strategy or priorities to fight corruption?

<sup>24</sup> Source: Survey of RAI beneficiaries. Results combined from two survey questions, filtered by respondents involved in each Outcome. Q: To the best of your knowledge, to what extent were corruption risk assessment mechanisms in use in your country before the RAI Programme commenced (pre-2016)? N=15; And Q. To the best of your knowledge, to what extent was Corruption Proofing of Legislation being implemented in your country before the RAI Programme commenced (pre-2016)? N=18.

<sup>25</sup> Source: Survey of UNODC CSO beneficiaries. Base n=15. Results combined from two survey questions. Q: Thinking back to 2015, when the programme started, to the best of your knowledge how relevant, if at all, would you say that the following activities were for your national strategy or priorities to fight corruption? Q. And thinking about now in 2020, how relevant, if at all, would you say that the following activities are now for your national strategy or priorities to fight corruption?

<sup>26</sup> Source: UNODC. Due to the status of Kosovo\* and as it is not a UNCAC signatory, it is not involved in the UNCAC review processes.

<sup>27</sup> See [https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/2-4September2019/IRG\\_2019\\_NGO\\_6.pdf](https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/2-4September2019/IRG_2019_NGO_6.pdf)

<sup>28</sup> See also section on 'Effectiveness' (Outcome 1)

<sup>29</sup> See also section on 'Effectiveness'.

<sup>30</sup> Source: RAI Progress Reports 1-7 as delivered to donor throughout Programme implementation. Note: N/A indicates that the country was not a target for the Outcome, ✓ indicates the Regional Programme achieved its Outcomes in the country, X indicates non-achievement (changes may have occurred but these are not attributable to the Programme).

<sup>31</sup> Source: Survey of RAI beneficiaries. Results combined from three survey questions, filtered by respondents involved in each Outcome. Q. To what extent would you say that corruption risk assessment mechanisms have been strengthened or weakened in your country over the course of the programme? (N=14); Q. To what extent was Corruption Proofing of Legislation strengthened or weakened over the course of the Programme in your country? (N=18) and Q. To what extent has regional cooperation on data exchange in asset disclosure and conflict of interest been strengthened or weakened as a result of this Programme?(N=13).

<sup>32</sup> See section on 'Relevance'.

<sup>33</sup> Aspects of the trainings which participants particularly appreciated were: The 'mock reviews' or role-playing aspect; learning about what UNCAC is and what it involves, cross-regional peer-to-peer learning between CSOs; using UNCAC reviews for wider advocacy; content on access to information, procurement, public sector finance, AML and asset recovery

<sup>34</sup> UNODC "Report on the Evaluation of the Multi-stakeholder Workshop on UNCAC and its review mechanism, VIC, Vienna, Austria, 20-23 September 2016". Please note responses were not disaggregated by country, so both SEE and African CSO comments in English were included in the analysis

<sup>35</sup> Source: Survey of UNODC Survey Beneficiaries. Base: All respondents who answered the question. Chart shows answers combined from 4 separate questions. Q How would you say your (a) skills to contribute effectively to the ongoing UNCAC review (b) skills to conduct in-country trainings on UNCAC (c) skills to work with private sector on anti-corruption/UNCAC and (d) amount of resources (financial, personnel or technical resources) which your organisation has to work with private sector on UNCAC... changed as a result of the programme?

<sup>36</sup> See Comparative review study on the civil society involvement in the process of revision of the UNCAC Convention Albania, Bosnia and Hercegovina, Croatia, Macedonia and Montenegro <https://ti-bih.org/english-comparative-report/?lang=en>

<sup>37</sup> Source: UNODC 7th progress Report Logframe Monitoring File

<sup>38</sup> Secondary analysis of UNODC "6th month follow up survey results - 2018" with the evaluation survey results, suggests that respondents to the follow up survey included non-training activities when asked "have you replicated any part of the training you received in your company, organization, chamber of commerce, country or region?". This, combined with possible memory recall issues for the evaluation survey, may account for a lower reported number of follow up trainings given than reported in the 7th progress report.

<sup>39</sup> The Sarajevo event in Sept 2017 and Belgrade event in Sept 2018 were both co-funded by ADA and the European Bank for Reconstruction and Development (EBRD)

<sup>40</sup> UNODC "Report on the Evaluation of the Multi-Stakeholder Workshop on the United Nations Convention against Corruption and its Review Mechanism, Sarajevo, Bosnia and Herzegovina, 25-29 September 2017"

<sup>41</sup> Secondary analysis of UNODC "6th month follow up survey results - 2018" with the evaluation survey results, suggests that respondents mentioned a broader range of follow up activities when asked "Since the workshop, have you taken part in any follow-up activities or collaborative efforts between the private sector and civil society to combat corruption?" rather than specifically joint advocacy and media campaigns as required for the log frame. This combined with possible memory recall issues for the evaluation survey may account for a lower reported number of follow up trainings given, that reported in the 7th progress report.

<sup>42</sup> See "UNODC Civil society and private sector agree on principles for partnership on addressing corruption in SEE" at

<https://www.unodc.org/unodc/en/ngos/civil-society-and-private-sector-agree-on-principles-for-partnership-on-addressing-corruption-in-see.html>

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<sup>43</sup> See UNODC Progress Report No. 7

<sup>44</sup> See <https://uncaccoalition.org/anti-corruption-platforms/southeast-europe/>

<sup>45</sup> Numbers of CSOs profiled from the following countries are: Albania -6, BiH - 5, Kosovo\* - 2, North Macedonia -3, Moldova -5, Montenegro -3, and Serbia -1.

<sup>46</sup> The 5 survey respondents who said that they/their organisation had attended intergovernmental meetings on UNCAC, each respectively said that they had attended 1, 2, 3, 12 and 40 meetings. The median is 3, and the mean is 12.

<sup>47</sup> Source: Survey of RAI beneficiaries. Results combined from two survey questions. Q: How likely or unlikely is it that the corruption risk assessment mechanism will continue to be applied in your country over the next 3 years? (N=14) And Q. How likely or unlikely is it that the Corruption Proofing of Legislation will continue to be applied in your country/institution over the next 3 years? (N=18)

<sup>48</sup> See section on IT tools sustainability below

<sup>49</sup> Source: Survey of UNODC CSO Beneficiaries. Base. All respondents who answered the question. Results shown are combined from 4 separate questions. Q. And how likely or unlikely (a) are you to use knowledge related to UNCAC again in the next 12 months (b) your organisation to engage in UNCAC implementation processes/ follow-up activities (c) use skills in working with the private sector again in the next 12 months and (d) use the E-Platform in the next 3 years?