

Final Report for the Mid-term Evaluation of the
Support to Anti-Corruption Efforts in Kosovo (SAEK) II project

Prepared for
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Prepared by
Julia Mager and Krenar Loshi
Evaluation Team

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Disclaimer

The evaluation report was prepared by a team of external consultants, respectively Julia Mager – International Consultant and Krenar Loshi – Local Consultant, with the review and oversight of the UNDP in Kosovo. The content, analysis and recommendation of this report do not reflect necessarily the views of the UNDP or the United Nations' member states.

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LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|--------|---|
| AC | Anti-corruption |
| AoK/LE | Assembly of Kosovo Legislative Committee |
| CEC | Central Election Commission |
| CSO | Civil Society Organization |
| DANIDA | Danish International Development Agency |
| EC | European Commission |
| ECPR | European Commission Progress Report |
| ERA | European Reform Agenda |
| ET | Evaluation Team |
| FIU | Financial Intelligence Unit |
| GOPAC | Global Organization for Parliamentarians against Corruption |
| KACA | Kosovo Anti-Corruption Agency |
| MTE | Mid-term Evaluation |
| OCF | Office of Chief Prosecutor |
| OPM | Office of the Prime Minister |
| PEP | Politically Exposed Persons |
| RRF | Results and Resources Framework |
| SAEK | Support to Anti-Corruption Efforts in Kosovo |
| SDC | Swiss Agency for Development and Cooperation |
| ToC | Theory of Change |
| ToT | Training of Trainers |
| UNDP | United Nations Development Programme |

EXECUTIVE SUMMARY

This report presents the findings of the mid-term evaluation of the UNDP Kosovo Project “Support to Anti-Corruption Efforts in Kosovo” (SAEK II project). The goal of SAEK II is to reduce corruption in targeted Kosovo public institutions through a supply and demand approach.

The expected overall outcome of the SAEK II project will be measured by the level of institutional capacities to deter, detect and sanction corruption involving institutions and public officials and effective civic engagement mechanisms to hold institutions accountable.

In achieving its objective the project engages with central and local level institutions in the following three components:

1. Enhancing policy, regulatory and monitoring framework on prevention and combatting corruption;
2. Supporting AC institutions to detect and process corruption cases effectively; and
3. Strengthening civic engagement mechanisms to hold institutions accountable.

This is a five year project, funded by Swiss Agency for Development and Cooperation (SDC) and Danish International Development Agency (DANIDA) with the overall budget of 4.5 mil. EUR, which started in 2016 and is due to end in 2020, as a follow-up to SAEK I (2012-2015).

In line with the ToR, this mid-term evaluation of the project focused on:

- Evaluating OECD DAC criteria relevance, effectiveness, efficiency, potential for impact and sustainability; and
- Elaborating lessons learnt and recommendations for the remaining implementation period.

This evaluation was carried out in participatory manner in line with the request of the UNDP. Accordingly, one additional focus area was identified during the inception phase, namely, the need to reconstruct the theory of change in order to fully reflect the project’s changed intervention logic. This was required as the project underwent some substantial changes soon after inception, while the theory of change was not been fully elaborated.

The time period covered by the evaluation is three years, from 2016 until the end of 2018, with specific focus on the new revised approach adopted in 2017.

The evaluation focused on the progress made with the key project stakeholders: Kosovo Anti-corruption Agency, Office of the Chief Prosecutor, Financial Intelligence Unit, Supreme Court, Assembly of Kosovo Legislative Committee/GOPAC, Office of the Prime Minister/Central Election Commission and Internews/KALLXO.COM, as well as with Kosovo Police and municipalities of Prishtinë/Pristina and Gračanica/Gračanice.

This evaluation has been conducted in line with the OECD DAC criteria relevance, effectiveness, efficiency, potential for impact and sustainability. To this end, a mixed methods approach using qualitative and quantitative data collection methods was applied in order to gain comprehensive understanding of the performance of the project. Data collection was conducted based on two main sources of information, i.e. primary and secondary sources. Secondary sources such as

project documentation, relevant national documents/strategies, and UNDP policies shown in Table 1 below, provided basis for assessing the project. Primary data sources was generated through field visits and semi-structured interviews, meetings with the project team, discussions with selected stakeholders, selected beneficiaries in the public administration and civil society as well as donors of the project. All data was collated, triangulated and verified before conclusions were developed.

Based on the findings, the evaluation team has scored the evaluation using the UNDP Scoring Scale, with the overall score of 5: **Satisfactory, with minor shortcomings (scale 1- 6)**¹. The details of ranking are highlighted in the Conclusions chapter.

The main **findings** of the evaluation are as follows:

Relevance: The relevance criterion has been assessed as **satisfactory with minor shortcomings (score: 5)**. The project is highly relevant to the situational context, tackling key problems at the central and local level through the three components. The project is well aligned with UNDP and national strategies as well as target group priorities. Yet, the level these strategies are referred to in the project document is relatively general. The research conducted by the Evaluation Team (ET) shows that there is a high demand to strengthen institutional capacities to deter, detect and sanction corruption involving institutions and public officials and to strengthen civic engagement mechanisms to hold institutions accountable. The project is highly relevant to local needs and is in line with national and local level strategies and UNDP, SDC and DANIDA priorities. The design of the project has been adequately adopted to the chosen goal. Due to a shift of focus from corruption prevention to corruption suppression, the original theory of change was deemed obsolete and as such has been reconstructed within the framework of this evaluation. The evaluation of this reconstructed theory of change shows that the hypothesis are plausible, the strategic reference framework is well anchored in the concept and the expected results (outcomes, outputs) are clearly defined. However, there is a need to clearly elaborate the assumptions and risks in line with this reconstructed theory of change.

Effectiveness: The evaluation of the effectiveness criterion concludes with an overall rating of **satisfactory with minor shortcomings (score: 5)**. The evaluation of the effectiveness criterion showed that the project is well on track to achieve its expected results (outcomes, outputs). The project implementation resulted in a track record of achievements such as the development of comprehensive anti-corruption institutional and legal framework and e-tools aiming at covering main gaps in the system and working with all anti-corruption institutions. Moreover, support provided to kallxo.com shows tangible results making the platform the second trusted anti-corruption actor in Kosovo after Police (Kallxo own survey). Furthermore, the competent, demand driven and participatory approach of the project team make them a trusted partner of key

¹ 6 = Highly satisfactory: no shortcomings; 5= Satisfactory: minor shortcomings; 4 = Moderately satisfactory: moderate shortcomings; 3 = Moderately unsatisfactory: significant shortcomings; 2 = Unsatisfactory: Major problems; 1 = Highly unsatisfactory: Severe problems.

stakeholders providing access to sensitive issues. While the project implementation progresses smoothly tackles challenges such as lack of political will, resistance to change, the Swiss Embassy adds to project's political clout through interventions in high level meetings when necessary. Most of the identified challenges are adequately addressed by the project as measures have been developed to tackle the challenges/problems, which hindered the effective implementation. Key challenges such as lack of political will to effectively combat corruption is very difficult to effectively address, while tangible results in combatting corruption will depend on political will of key stakeholders. Commitments to promote ownership, alignment and harmonization aid, management for development results and mutual accountability are all anchored and reflected in mechanisms to ensure the effective project implementation.

Efficiency: The efficiency criterion has been assessed with an overall rating of **satisfactory with minor shortcomings** (score: 5). The evaluation of the efficiency criterion brought the following findings: On management and administrative arrangements and definition of roles and responsibilities there is a need to strengthen the project management role as already foreseen with the current vacancy for the position of project manager. This position has been re-advertised in order to increase the pool of suitable candidates. On the analysis of how well have the various activities transformed the available resources into the intended results in terms of quantity, quality and timeliness (in comparison with the plan) the evaluation found: The project's use of its own resources in terms technical advice is a very efficient approach to ensure high quality and timeliness of intended results. Also, the use of embedded advisors, development of annual accredited training courses are approaches and regional activities resulting in achieving intended deliverables in terms of quality, quantity and timeliness. Yet, the evaluation also found that there is room for improvement regarding the approach to integrity plans and the anti-corruption journalism award. While the majority of resources have been used efficiently with regard to achieving the intended results in terms of timeliness, a few results have not been achieved in time. This is mainly due to the fact that relevant legislation and policy have not been adopted so far by relevant institutions which is outside the project's control.

Potential for impact: The impact criterion has been assessed with an overall rating of **satisfactory with minor shortcomings** (score: 5). Evaluating the potential for impact criterion shows that the project has been successful in establishing an enabling environment for corruption prevention and suppression. While contributing to decreasing corruption in a challenging environment ,it the project devised some approaches, which have particular potential for impact according to research findings². Accordingly, approaches focusing on increasing judicial independence, establishing e-tools, increasing budget transparency and strengthening social accountability through kallxo.com and GAP have solid potential to have impact. While the project

² For example, the ANTICORRP project (2013-17) has been one of the largest social science research projects of the European Union. ANTICORRP has systematically assessed the impact of public anticorruption tools and their enabling contexts. The findings are public and can be found at: Alina Mungiu-Pippidi, 2018: Seven Steps to Control of Corruption: The Road Map, available at: https://www.mitpressjournals.org/doi/abs/10.1162/daed_a_00500; European Journal on Criminal Policy and Research, Volume 22, Issue 3, September 2016, <https://link.springer.com/article/10.1007/s10610-016-9322-1> and the special issue November 2018 of Crime, Law and Social Change on evidence-based anti-corruption, <https://link.springer.com/journal/10611>

reaches vulnerable groups and minorities, in particular, through kallxo.com and TV shows, it lacks a fully developed strategy on how to address the needs of women beyond gender mainstreaming.

Sustainability: The sustainability criterion has been assessed with the overall rating of **satisfactory with minor shortcomings** (score: 5). The findings show that there is still room for improvement in order to ensure that the benefits of the project will continue after it has ended. On the positive side, the project's systematic approach to anti-corruption on the supply and demand side provides a solid basis to ensure sustainability of the anti-corruption system in Kosovo. Yet, the project lacks a coherent approach to ensure the sustainability of results once it has been ended. This is particularly required considering the policy and legislation implementation gap, the risk of not effectively using e-tools and the donor dependence of Kallxo.com. Moreover, the findings show that there is room for improvement in institutionalizing acquired knowledge and skills. This is particularly needed as the project invested in capacity building programmes of financial crime, fraud examination and forensic crime experts. Additionally, more efforts are required to foster a change of behaviour's and motivations in terms of paying attention to marginalized and vulnerable groups. Furthermore, a lack of a concrete and realistic exit strategy and sufficient mitigation measures on sustainability risks will hinder ensuring sustainability to the full extent possible.

Lessons learned

The **lessons learned** are built around the key features of the project that need to be maintained in future phases:

Embedded advisors: Physical presence of embedded advisors in the key institutions has proven to be a great value added proposition of the project, securing not only effective on-the-job capacity development, direct communication and follow-up with beneficiaries, but also an added quality assurance. Nevertheless, the project must be mindful of capacity substitution trap and ensure that there's a clear exit strategy to such involvement.

Flexibility in approach: The project's flexible approach in addressing emerging needs of the key stakeholders has turned the project into a trusted partner, enabling stakeholders to swiftly address any emerging issues, thus clearing obstacles to a successful accomplishment of the set objectives. In advancing further, the project must capture well and document these key turning moments into project reports.

E-tools and platforms: The project's efforts in digitalizing the corruption reporting, tracking and investigation is enabling key anti-corruption institutions, as well as citizens to interact with one another much more effectively and at the same time adding to institutional transparency and accountability towards the citizens. During the next phase, the project must ensure higher degree of sustainability of use of such tools and platforms once the project has ended.

Shifting focus on integrity plans: The shift of focus from corruption prevention to corruption suppression entailed a change in approach on integrity plans moving from a UNDP-supported system to a national system on integrity plans. While the latter has potential to ensure sustainability of integrity plans in the long-run, an incremental approach moving from the UNDP-driven system to a national system on integrity plans is required.

Establishing and maintaining a comprehensive approach to combatting corruption: While the project established a comprehensive approach on addressing gaps in the anti-corruption system and developing the corresponding policy and legislative framework, there is the need to develop a more coherent approach on ensuring sustainability of the newly established anti-corruption system. This is particular due to the significant policy and legislation gap and the lack of capacities to effectively monitor and report on the implementation of relevant policies and legislation.

Increasing impact: While establishing an enabling environment for corruption prevention and suppression, intervention areas providing for more impact such as increasing judicial independence, establishing e-tools, increasing budget transparency and strengthening social accountability through kallxo.com and GAP should be prioritised in this complex context of Kosovo.

Demonstrating competence and gaining trust: The solid competencies of the project team provided the project with access to get involved in sensitive issues and gain trust of key stakeholders. This approach should be maintained in the remainder of the project implementation.

Keeping low profile: Although, at a cost to project's visibility, the project managed to influence policy direction in several relevant areas, while keeping a low profile to not attract the reaction of "interest groups" that could potentially become obstacle to reforms. This approach proved to be successful and should be maintained in 'sensitive' areas of intervention.

Long-term commitment: The project collaborates with a large number of stakeholders on highly complex issues and thus requires longer-term commitment in order to ensure impact of the suppression approach.

Recommendations

The evaluation suggests that the project on oncoming future phases needs to undertake the following measures:

Increasing relevance

- Clearly elaborate the assumptions and risks in line with the revised reconstructed theory of change.

Strengthening effectiveness

While the overall approach of the project demonstrated to be effective in achieving the expected results (outcomes, outputs), the following could be improved in remaining implementation period:

- Develop a coherent approach fostering the adoption of the Anti-corruption Strategy, and the amended laws, in particular, the Law on Financing Political Entities/Law on General Elections. In order to increase the needed political clout, closer cooperation with international key players such as the European Union or the United States of America is recommended. If successful this approach of fostering the adoption of laws should also be applied to other policies and laws to be adopted within the framework of this project.
- Considering that the project focused the first half of the implementation on developing and amending key laws and regulations, the focus on the second half needs to be on ensuring that key stakeholders possess the necessary capacities and mechanisms to effectively implement the improved policy and regulatory framework. Particularly, substantial amendments of laws will require continued trainings of key stakeholders, in particular, training of the prosecution to increase their understanding of the new laws. These trainings should focus on amendments to the Criminal Code, to the Law on High Officials Assets and Income Declarations, Law on Political Party Financing, and the Law on Disciplinary Liability of Judges and Prosecutors.
- Develop a coherent approach on ensuring the effective implementation of the Law on Financing of Political Entities/Law on General Elections and increase the capacities of newly established monitoring body in the CEC.
- Institutionalize the approach to corruption proofing based on stakeholder interests, capacities and potential to effectively apply the corruption proofing guidelines in the long-run. Clear institutional accountability lines should be established in order to avoid “blame-shifting” in case the guidelines are not implemented coherently. It is recommended to further develop the approach on corruption based on good practices in the region.
- Ensure that key stakeholders such as the Kosovo Anti-corruption Agency are supported in increasing their capacity to implement its expanded mandated in line with the Law on Anti-corruption Agency and the Law on High Officials Assets and Income Declarations. This will require training of staff and eventually establishing a ToT approach to increase the sustainability of the KACA.
- Ensure that institutions using e-tools to detect and process corruption cases will have the needed capacities to use these tools on a regular basis. E-tools need to be developed as user-friendly platforms, which will lead to efficiency gains.
- To support the Supreme Court in amending the sentencing guidelines in line with the revised Criminal Code and to build capacities enabling the Supreme Court to amend the sentencing guidelines regularly.
- Improve cooperation with EU and US in order to increase the political leverage and clout needed to move ahead with the implementation of the project.
- Further develop an approach to foster political will and decrease resistance to change.
- Support Kallxo.com in improving their security architecture to be better protected against threats in the course of anti-corruption investigations. The project could offer a training on security measures for investigative journalists working on corruption.

Improving efficiency

- The UNDP Programme Associate responsible for SAEK should ensure that all relevant data is captured and inserted in Atlas on regular basis and as comprehensively as possible, covering all RRF indicators.
- Based on the evaluation the proposed set up of the SAEK project team would be:
 - Project Manager – oversight, monitoring and management
 - CTA – overall technical advise
 - Dedicated Project Officers: one for implementation of outcome1 with legal background and another Project Officer with governance/CSO background for implementation of outcome 2 and 3
 - JPO – responsible for knowledge management, communication and visibility
- Alternative approaches to support institutions with integrity plans should be considered such as regular mentoring through the project team.
- The project should maintain and potentially increase its efforts to monitor and to push for the adoption of developed anti-corruption legislation and policies. Coordinating and building coalitions with other key stakeholders including international actors with political clout such as the European Union or the United States should be considered. This can be further explored through partnerships meetings where key stakeholders participate that SAEK organizes regularly for the last 2 and a half years.

Increasing potential for impact:

- Decreasing corruption is a very complex endeavour, in particular, in Kosovo. In order to increase the potential for impact it is recommended to consider latest research findings on anti-corruption
- tools and approaches. Accordingly, the project should continue and potentially expand approaches to increase judiciary independence, develop e-tools, to increase budget transparency and to improve social accountability through kallxo.com and GAP. These approaches demonstrated high potential for impact.³
- Develop a comprehensive monitoring and reporting system on RRF indicators at the project level.
- Enhance the kallxo.com platform by introducing additional features that enable reporters of corruption besides location to also indicate the age group, gender and ethnicity. The features could be optional, although there is no strong reason for it as they don't reveal identity.

Increasing sustainability

³ For example, the ANTICORRP project (2013-17) has been one of the largest social science research projects of the European Union. ANTICORRP has systematically assessed the impact of public anticorruption tools and their enabling contexts. The findings are public and can be found at: Alina Mungiu-Pippidi, 2018: Seven Steps to Control of Corruption: The Road Map, available at: https://www.mitpressjournals.org/doi/abs/10.1162/daed_a_00500; European Journal on Criminal Policy and Research, Volume 22, Issue 3, September 2016, <https://link.springer.com/article/10.1007/s10610-016-9322-1> and the special issue November 2018 of Crime, Law and Social Change on evidence-based anti-corruption, <https://link.springer.com/journal/10611>

- Given that the project experience a major shift in its approach, , the upcoming implementation period should be focused on sustainability. The project team is encouraged to develop an exit strategy in participatory manner with key stakeholders involved in the project as well as close coordination with the donors to the project. This is also necessary in case a follow-up project is envisaged. The following recommendations should be considered in the upcoming period and could also be included in the exit-strategy.
- Develop a comprehensive approach on how to ensure sustainability of the developed policy and legislative framework. Ensure that key stakeholders such as the Kosovo Anti-corruption Agency are supported in increasing their capacity to implement its expanded mandate in line with the Law on Anti-corruption Agency and the Law on High Officials Assets and Income Declarations. This will require training of staff and eventually establishing a ToT approach to increase the sustainability of the KACA.
- Considering the comprehensive changes resulting from the newly developed policy and legislative framework, any follow-up project should focus on increasing its sustainability and building on achievements to date.
- Develop a coherent approach on ensuring the effective monitoring of implementation of the Law on Financing of Political Entities/Law on General Elections and increase the capacities of newly established monitoring body.
- Develop a step-by-step approach ensuring a smooth transition from UNDP-driven to nationally driven approach to integrity plans. This approach should focus on increasing the sustainability of existing integrity plans, in particular, linking them with the budgets of the relevant institutions and communicating the new approach to institutions.
- Consider establishing a monitoring mechanism on the implementation of recommendations of the corruption risk assessments carried within the framework of this project. It is assumed that this would result in an increased implementation rate and improved sustainability of the results.
- Institutionalize the approach to corruption proofing based on stakeholder interests, capacities and potential to effectively apply the corruption proofing guidelines in the long-run. Clear institutional accountability lines should be established in order to avoid “blame-shifting” in case the guidelines are not implemented coherently. It is recommended to further develop the approach on corruption based on good practices in the region.
- In order to ensure the sustainability of the sentencing guidelines and strengthen accountability on their use, it is recommended to establish an electronic platform providing an overview of the sentencing on corruption cases.
- Support the Supreme Court in amending the sentencing guidelines in line with the revised Criminal Code and build capacities enabling the Supreme Court to amend the sentencing guidelines regularly.
- Ensure that institutions using e-tools to detect and process corruption cases will have the needed capacities to use these tools on a regular basis. E-tools need to be developed as user-friendly platforms, which will lead to efficiency gains.
- Review the use of the PEPs typology in order to strengthen the sustainability of the tool.

- In order to address obstacles to sustainability of the Office of the Disciplinary Prosecutor, it is advisable to recommend relevant institutions a transfer of civil servants who have been involved in the capacity building measures.
- In order to strengthen the sustainability of communication and PR functions of the Office of the Chief Prosecutor, it is recommended to increase communication capacities of this office avoiding any capacity gaps once the embedded advisor will leave in 2020. To this end, it is recommended to review the communication system and see how capacity gaps and coordination could be increased.
- It is recommended to engage an Expert on Business Model development in order to assess opportunities for Kallxo.com to develop a business model, which does not solely depend on donor funds. In case technical and regulatory obstacles could be overcome crowdfunding through a specific application would be an option to consider.
- In order to ensure the sustainability of the anti-corruption award it is recommended to hand-it over to domestic institutions – either any of the well-known anti-corruption NGOs and/or KACA.
- It is recommended to expand the approach to gender mainstreaming and minority inclusion to move beyond equal participation to empowerment tackling, in particular, areas in which vulnerable and marginalized groups are potentially exposed to corruption. Measures can include support Kallxo.com to add additional features to its platform besides geographical location, whereby users/reporters are also asked to declare their gender, age group and ethnicity. These features can also be optional, but are important in order to assess the impact of corruption awareness and nature of their concerns amongst vulnerable groups i.e. women, youth and minorities.

I EVALUATION BACKGROUND

The mid-term evaluation of UNDP's "Support to Anti-Corruption Efforts in Kosovo" (SAEK II project) was commissioned by the UNDP Kosovo, and was carried out during the period of 27 November 2018 – 26 December 2019, by an evaluation team consisting of one international and one local expert. The goal of SAEK II is to reduce corruption in targeted Kosovo public institutions through a supply and demand approach. The expected overall outcome of the SAEK II project will be measured in institutional capacities to deter, detect and sanction corruption involving institutions and public officials and effective civic engagement mechanisms to hold institutions accountable.

The SAEK II started implementation in May 2016 and is due to end on 30 April 2020. The SAEK II is funded by Swiss Agency for Development and Cooperation (SDC) and Danish International Development Agency (DANIDA) with the overall budget of EUR 4.5 mil.

As per ToR, this mid-term evaluation of the project aims at assessing the progress made in the implementation of the SAEK II project.

The SEAK II project is embedded in the context and framework of combatting corruption in Kosovo. While anti-corruption laws are strong, enforcement of anti-corruption legislation in Kosovo remains weak. According to European Commission Progress Report for 2018 (ECPR 2018)⁴ Kosovo is at an early stage/has some level of preparation in the fight against corruption and organised crime. Some progress was made with the track record on high level corruption and organised crime cases. While there is more preliminary confiscation of assets, there are still few final convictions, financial investigations and final confiscations of assets. Law enforcement agencies struggle to effectively fight organised crime in Kosovo. The police, prosecutors, and courts have thus far not been effective in in this respect. The judicial system is inefficient, leading to poor enforcement. The judicial system suffers from a large backlog; over 400,000 civil and criminal cases awaiting trial. The police still do not have enough sufficiently skilled prosecutors and police officers to investigate corruption. Tax evasion is common and the tax collection rate is low.

In addition, political parties' finances and campaign funding and expenditure continue to lack transparency and related legislation remains largely unenforced. This undermines public trust in political parties and continues to expose the democratic process to significant risks of corruption and undue influence. Moreover, Kosovo's civil society is underdeveloped and lacks sufficient funding to promote citizens' interests independently of the Institutions. Less than a third of registered CSOs are active, and those active are mainly supported by international organizations. CSOs are generally powerless to have an impact as watchdogs and abstain from criticizing institutions policies, thereby preventing democratic progress in Kosovo.

The ECPR 2018 recommends that in line with the European Reform Agenda, with a view to continue progress on the track record, the Kosovo institutions in the coming year should in particular:

- increase the number of prosecutors in the Special Prosecution Office investigating and prosecuting high-level corruption cases, and provide training to strengthen their capacity to conduct financial investigations, confiscate assets and effectively protect witnesses;
- amend the legal framework (on the suspension and removal of public officials indicted for and convicted of corruption, on declarations of assets and on whistle-blowers) bringing it in line with European standards;
- amend the legal framework governing political party and campaign financing on the basis of an opinion of the Venice Commission to ensure effective enforcement, accountability and transparency.

Worth mentioning, these recommendations are at the core of the SAEK project interventions.

⁴ This report covers the period from October 2016 to February 2018

II DESCRIPTION OF THE INTERVENTION

The SAEK II started implementation in May 2016 and is due to end on 30 April 2020. The SAEK II is funded by Swiss Agency for Development and Cooperation (SDC) and Danish International Development Agency (DANIDA) with the overall budget of EUR 4.5 mil.

The SAEK II project is a follow-up to SAEK I project, which was implemented during 2012 – 2015 period. Whereas the SAEK I focused on corruption prevention through institutional, citizen and CSO engagement, the SAEK II focuses on the corruption prevention and suppression through engagement with key anti-corruption institutions, namely Kosovo Anti-Corruption Agency (KACA), Office of the Chief Prosecutor (OCP), Financial Intelligence Unit (FIU), Supreme Court, Assembly of Kosovo Legislative Committee/GOPAC, Office of the Prime Minister/Central Election Commission and Internews/KALLXO.COM.

At the request of the donor, the project underwent a major change in 2017 by shifting focus from corruption prevention to corruption suppression activities. To this end, UNDP showed great flexibility in accommodating the changes requested by the donor. This shift in focus required significant effort by the project team in realigning the project activities, as well as discussing and agreeing on changes with project partners. These changes were adequately reflected in the new RRF and internal AWP. Nevertheless, due to time pressure the changes were not reflected in a new theory of change model. As such, this evaluation focused on reconstructing the theory of change as follows:

The goal of SAEK II is to reduce corruption in targeted Kosovo public institutions through a supply and demand approach. The expected outcome of the SAEK II project will be measured in institutional capacities to deter, detect and sanction corruption involving institutions and public officials and effective civic engagement mechanisms to hold institutions accountable. The intended impact of the project is **decrease in level of corruption** in targeted Kosovo public institutions. This will be achieved through three expected results/outcomes:

In achieving its objective the project engages with central and local level institutions in the following three components:

1. Enhancing policy, regulatory and monitoring framework on prevention and combatting corruption;
2. Supporting AC institutions to detect and process corruption cases effectively; and
3. Strengthening civic engagement mechanisms to hold institutions accountable.

Outcome 1: Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced

In the new ToC the **first outcome** focuses on development of policies, legislation, plans and strategies in line with international standards on anti-corruption in order to enable anti-corruption institutions to oversee integrity and transparency of central and local institutions and of political parties. The outcome 1 theory of change is that if selected institutions are supported to develop policies, legislation, plans and strategies in line with international standards on anti-corruption and

aided in their implementation and monitoring, then anti-corruption institutions will demonstrate increased compliance with principles of integrity, transparency and improved capacities to suppress corruption. This is because of the policy and legislative framework once implemented will close existing loopholes for corruption and ensure increased integrity and transparency through integrity plans, and various e-tools e.g. asset declarations etc.

Outcome 2: Anti-corruption institutions detect and process corruption cases effectively

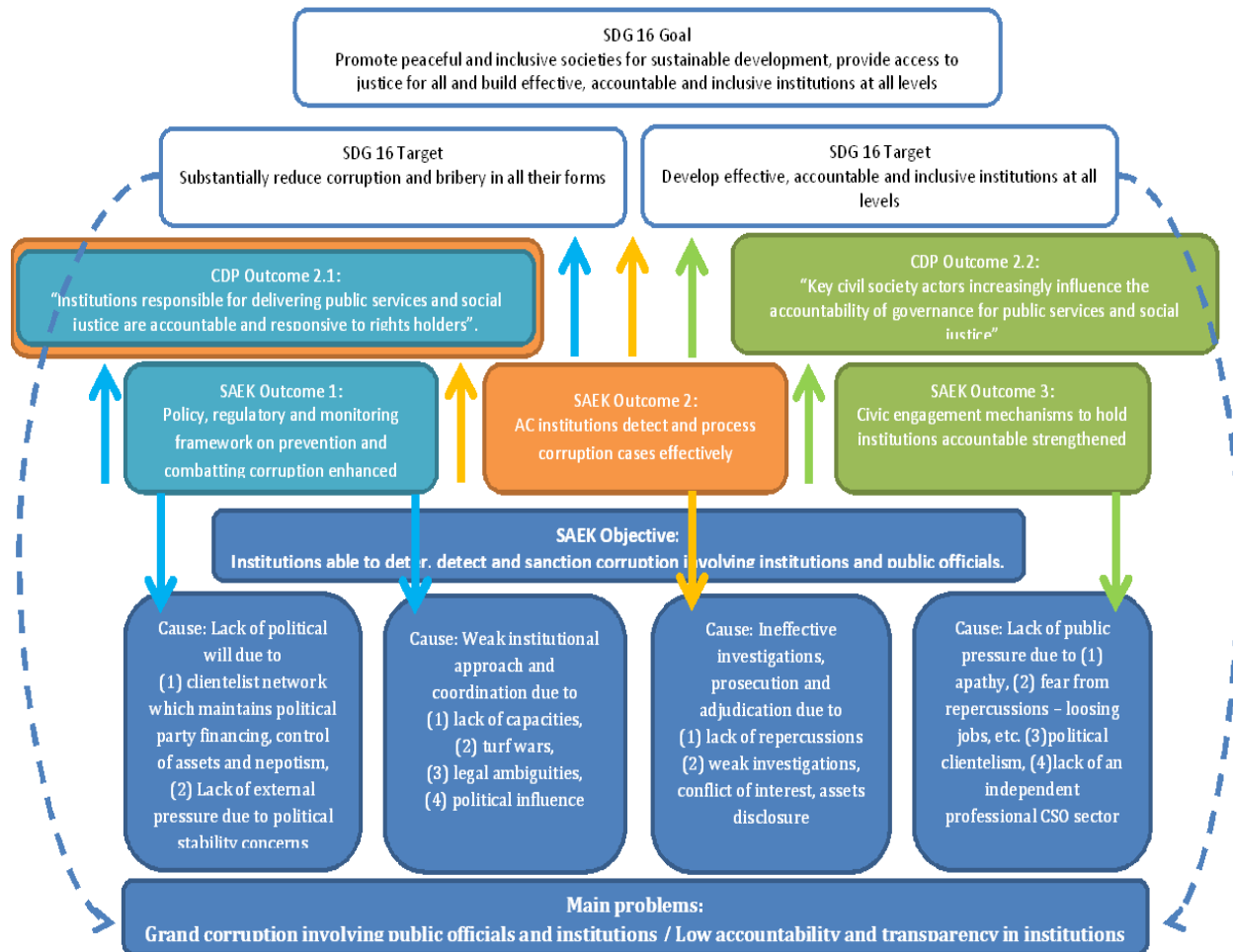
The **second outcome** focuses on strengthening the anti-corruption institutions and providing them with the capacity and tools to effectively detect and combat corruption. The outcome 2 theory of change is that if relevant anti-corruption institutions operate in line with an improved policy and legislative framework and have improved capacities and tools to detect and reveal corruption then these institutions will have the capacities to seize illicit assets and to ensure their repatriation to the public budget.

Outcome 3: Civic engagement mechanisms to hold institutions accountable strengthened

The third outcome focuses on development civic engagement mechanisms through initiatives on corruption reporting, referral and monitoring and on transparently displaying public expenditure resulting in increased awareness on how corruption is tackled and capacities to hold public institutions accountable. The **outcome 3 theory of change** is that if civic engagement mechanisms are established and used through initiatives on corruption reporting, referral and monitoring, on transparently displaying public expenditure and increased awareness on how corruption is tackled, then the public institutions will be more influenced to be accountable to citizens to follow anti-corruption rules and procedures.

The theory of change model below illustrates this logic:

Support to Anti-Corruption Efforts in Kosovo (SAEK) II Theory of Change



II EVALUATION SCOPE AND OBJECTIVES

The overall objective of this assignment is to conduct a mid-term evaluation of the SAEK II project in line with the Terms of Reference for this assignment.

As per ToR, the evaluation of the project was carried out in terms of its:

- Relevance, effectiveness, efficiency, impact and sustainability; and
- Elaboration on the lessons learnt and recommendations for the remaining period.

Prior to assessing the overall progress of the project and seeking evidence on whether, why and how the logic of intervention has worked, as agreed with the UNDP and SAEK Team, the project's **Theory of Change (ToC)** model was reconstructed, in order to allow for adequate methodological approach to the evaluation. This was required as the project underwent some substantial changes after the start in 2016, while the changes to the theory of change were not fully

elaborated. The new ToC was also reflected in a revised **Results and Resources Framework (RRF)** document (Annex 1).

Institutional scope: The evaluation focused on the progress made in the three components with the key project stakeholders: Kosovo Anti-corruption Agency, Office of the Chief Prosecutor, Financial Intelligence Unit, Supreme Court, Assembly of Kosovo Legislative Committee/GOPAC, Office of the Prime Minister and Internews/KALLXO.COM, Kosovo Police and municipalities of Prishtinë/Pristina and Gračanica/Graçanicë. External parties such as Kosovo Democratic Institute (KDI) were also consulted on their overview of situation.

Time scope: The time period covered by the evaluation is three years, from 2016 until the end of 2018, with specific focus on the new revised approach on corruption suppression adopted in 2017.

IV EVALUATION METHODOLOGY

4.1 General Principles

This evaluation strictly adheres to the transparency norms and ethical principles set by the United Nations Evaluation Group. The evaluation will be conducted in line with the principles that are outlined in the:

- UNEG “Ethical guidelines for Evaluation”
- “Code of Conduct for Evaluators in the UN System”.

The guidance provided by the United National Evaluation Group Quality Checklist for Evaluation and UNDP Handbook on Planning, Monitoring and Evaluating for Development Results was followed.

In line with recommendations of United National Evaluation Group the evaluation was carried out in a participatory way. Primary stakeholders of the UNDP SAEK II project participated in the evaluation during the interviews and consultations.

4.2 Data collection, sources and analysis

In line with the ToR, the evaluation relied on a mixed-methods approach in order to ensure reliability and validity of evaluation results.

Data was collected through desk review of project documentation, project monitoring data, relevant policies and field work. A mix methods approach using qualitative and quantitative data collection methods was applied in order to a gain comprehensive understanding of the performance of the project. Data collection was conducted based on two main sources of information, i.e. primary and secondary sources. Secondary sources such as project documentation, relevant national documents/strategies, and UNDP policies shown in Table 1 below, provided basis for assessing the project. Primary data sources was generated through

field visits and semi-structured interviews, meetings, discussions with selected stakeholders, selected beneficiaries in the public administration and civil society as well as donors of the project.

Table 1 - The main data sources and its usage in the evaluation:

| Main Data Sources | Description and Usage |
|--|---|
| SAEK II Project Document (original and revised version) | Key document for reviewing and reconstructing the theory of change and assessing the project against selected OECD DAC evaluation criteria/ evaluation questions. |
| SAEK II Project Reports (Semi-Annual and Annual Reports) | Key documents for assessing the progress of the project and assessing all relevant OECD DAC criteria/evaluation questions |
| SAEK II Annual Work Plans | Key documents for assessing the intervention logic and progress made in the implementation |
| SAEK II Project Board meeting notes | Key documents for assessing OECD DAC criteria/evaluation questions |
| SAEK II conceptual documents on rebalancing the project (Non paper, concept documents etc.) | Key documents for reconstructing and reviewing the theory of change |
| National strategies and policies on anti-corruption | Key documents to assess OECD DAC relevance criteria |
| SAEK II monitoring system and data | Essential quantitative data to assess relevant evaluation questions |
| UN Common Development Plan 2016-2020 | Key documents for reconstructing and reviewing the theory of change |
| Corruption assessments, reports and evidence-based corruption research (e.g. Transparency International's Corruption Perception Index (CPI), European Commission Progress Reports, UNDP Mosaic and Public Pulse reports, etc.) | Essential quantitative analysis on corruption trends |

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| Semi-structured interview with key informants | Essential for assessing OECD DAC criteria/evaluation questions |
| Group discussions | Essential for assessing OECD DAC criteria/evaluation questions |

Desk study: A comprehensive desk review of relevant project related documents has been conducted during the inception phase. The main focus of this desk review has been on understanding the SAEK II project, its theory of change, relevant beneficiaries and stakeholders in order to develop the evaluation methodology, evaluation matrix and a detailed work plan. The desk review also analysed existing secondary data (see Table 1 above) which could be used to assess the evaluation questions.

Field data collection: In the period of 10-14 December 2018 a field mission in Kosovo took place in order to collect primary data through semi-structured interviews, workshops, and small group discussions with key stakeholders and beneficiaries. The aim of this data collection phase was to gather diverse views on the SAEK II project.

Sampling: In order to increase the reliability of findings, the evaluation team used targeted sampling methods for each data collection process. Based on the stakeholder mapping a targeted non-random sampling technique was used to ensure balanced views and opinions from different stakeholder groups. Accordingly, the primary qualitative data collection process was designed to reach the full range of stakeholders, including beneficiaries, partners in Kosovo institutions, other international development partners, and civil society actors. To this end, a targeted selection procedure was applied for identifying relevant primary stakeholders who were closely involved in the implementation of the project and therefore possess sound knowledge on the project. Additionally, secondary stakeholders such as relevant civil society actors involved in anti-corruption work have been identified. The final sampling procedure was completed in collaboration with the UNDP SAEK II project team who assisted in developing the interview schedule and arranging of the interviews.

Data collection instruments and protocols: Interview guides (Annex 2) for the fieldwork were developed and applied consistently in line with the evaluation matrix. This ensured the systematic collection of data encompassing the questions and sub question of the evaluation matrix.

Data analysis and management: All data was collated, triangulated (see below on triangulation) and verified before conclusions will be developed. In order to analyse the data, protocols on interviews and group discussions were developed during the field mission.

Triangulation of data, sources and methods was used to minimise the possibility of errors and discrepancy. On data triangulation, data from different sources was collected using different data collection techniques, e.g. semi-structured interviews with different stakeholders and document

analysis. Additional data collection methods such as meetings, workshops, discussion groups, and a comprehensive analysis of different project documents and relevant policy documents was used in order to enhance the reliability.

Researcher triangulation, i.e. two independent evaluators collecting and analysing the data, was used throughout the evaluation process. Impartiality and independence was strictly observed during the selection of respondents for interviews.

Reliability and quality of information/data was ensured through a critical review and analysis, cross-checks, discussions among evaluators and probation of respondents while collecting information on project. The methodology used for this evaluation is an approach of analysis of primary and secondary data and finding out their interlinkages and developing an evaluative report. This approach is an established evaluation methodology aiming at capturing all stakeholders' comprehensive views.

4.3 Limitations

Regarding evaluability defined as “clarity in the intent of the subject to be evaluated, sufficient measurable indicators, accessible reliable information sources, and no major factor hindering an impartial evaluation process”⁵, it must be stated that the project revision which took place in 2016, was not sufficiently reflected and justified in the revised project document and the ToC, which constrained the evaluation. Thus, the Evaluation Team in discussion and cooperation with the project team reconstructed the ToC, in order to reflect the changes made and enable meaningful evaluation to take place.

Moreover, the desk study demonstrated that there is a lack of quantitative monitoring data which could be used to fully apply a mixed methods approach. Due to the tight timeline it was possible to conduct any additional quantitative data collection, and the evaluation need to rely on existing data available.

Additionally, it is important to point out that the time framework for this evaluation is very tight, which impacts on possibilities for adhering to good practices in the use of participatory methods, in particular the establishment of an evaluation reference group recommended by the United Nations Evaluation Group.

The following limitations inherent to the methods used were identified:

- *Selection bias* - As some informants may decline to participate, there is a possibility of selection bias, i.e. those respondents who choose to participate might differ from those who do not in terms of their attitudes and perceptions, their affiliation with central institutional / non-government structures, and socio-demographic characteristics and experience. This may apply to in-person interviews, and group discussions.

⁵ UNDP Handbook on Planning, Monitoring and Evaluating for Development Results, p 83

- *Recall bias* - Since a number of questions deal with issues that took place in the past or with changes that have taken place since the projects began, recall bias cannot be excluded. Some respondents may find it difficult to accurately compare organisational arrangements/capacity one or more years ago to the current situation.
- *Halo bias* - There is a known tendency among respondents to under-report socially undesirable answers and alter their responses to approximate what they perceive as the social norm (halo bias). The extent to which respondents will be prepared to reveal their true opinions may also vary for some questions that call upon the respondents to assess the performance of their colleagues or people on whom they depend on for the provision of services. In order to mitigate this limitation, the evaluation will provide the respondents with confidentiality and anonymity guarantees that will be embedded in data collection instruments as opening statements, where possible. Moreover, the interviews will be conducted in settings where respondents feel comfortable. Additionally, the evaluation team will focus on establishing rapport between the interviewer and the respondent.

In order to mitigate the potential effects identified above for qualitative data where much of the evidence may be anecdotal or inferred, the evaluation team used different triangulation methods to identify any inconsistencies and reduce the “response bias”, in which respondents tend to tell the evaluators what they want to hear. The use of layered triangulation across different methods, sources of information and evaluators and the mixed methods approach will reduced uncertainty in this regard. In sum, due to the fact that data, researcher and method triangulation will be possible and will be used for most evaluation questions the evidence generated is reliable.

V FINDINGS

5.1 Relevance

The relevance criterion focuses on the extent the project has been developed and implemented in line with UNDP and national policies, extent of the needs of the targeted group reflected, and extent of alignment with the chosen goal. For this purpose the following key questions have been analyzed (see Annex 2 for details):

- To what extent does the project fit into the relevant strategic frameworks?
- To what extent does the project reflect the needs of the target group?
- To what extent does the design of the project is adequately adapted to the chosen goal?

The project is highly relevant to the situational context, tackling key problems at the central and local level through the three components. The project is well aligned with central and local strategies as well as UNDP priorities. The research conducted by the Evaluation Team (ET) shows that there is a high demand to strengthen institutional capacities to deter, detect and

sanction corruption involving institutions and public officials, which is fully in line with the objective of the project.

The project design has allowed for substantial degree of flexibility required to address different and emerging needs of key stakeholders and beneficiaries. Upon demands of the SDC, the project has been able to make a significant shift from corruption prevention to corruption suppression without disturbing the balance of activities overall. Some of the shortcomings on prevention aspect regarding implementation of the Integrity Plans are expected to be dealt in the oncoming period through the new legal framework. This amended legislative and policy framework is expected to be adopted in the first half of 2019, whereby the new Anti-corruption Strategy 2018 – 2022 and new Law on KACA will make Integrity Plans obligatory for all institutions and will equip KACA with the mandate to monitor their implementation.

The shift of focus on corruption suppression has strengthened the project further, both in terms of areas and institutions covered, bringing much more credibility to the project and added value to beneficiaries of the project, through support to the necessary legislative amendments⁶ (under Outcome 1) and development of e-tools for detection of corruption⁷ (under Outcome 2). At the same time the work on prevention has been enhanced through continued support to Kallxo.com platform (under Outcome 3), corruption risk assessment (under Outcome 2) and newly introduced corruption proofing methodology in 2018 (under Outcome 1). Furthermore, under the new mandate of KACA, the institutions will be obliged to establish and implement Integrity Plans and report to KACA on a regular basis, which institutionalises and further strengthens the corruption prevention aspect of the project.

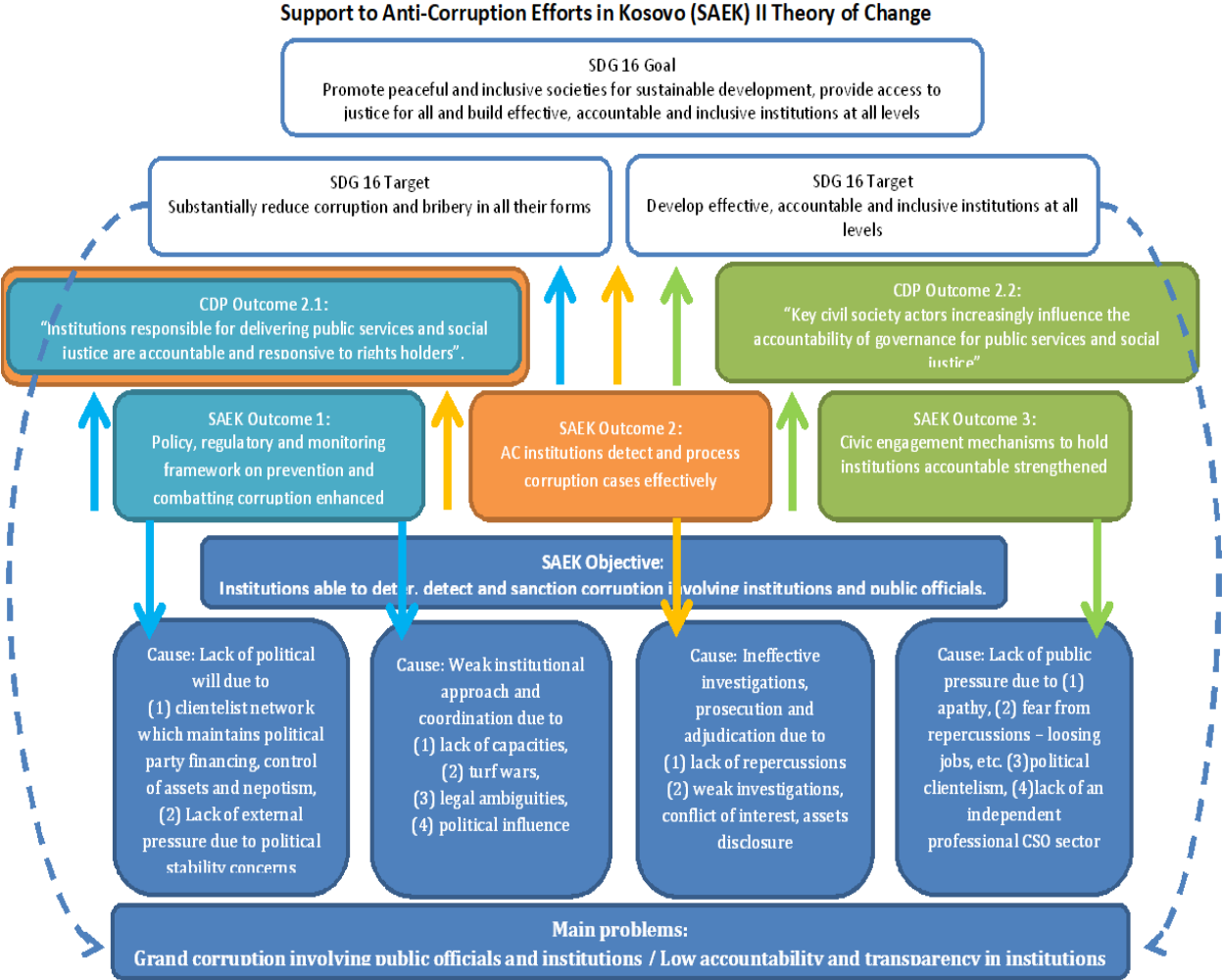
In view of these changes, the Theory of Change (ToC) of the project has been analysed by the evaluation team during the evaluation. Due to changes in the focus of the project from prevention of administrative corruption to suppression of grand corruption, the theory of change has been reconstructed jointly with the SAEK team during this evaluation. The new ToC (see Chart 1 below) has also been reflected in the new revised Results and Resources Framework (RRF) (Annex 1) followed by necessary changes to objective, outcomes, outputs and indicators in allowing the completed and planned activities to be reflected adequately and evaluated.

The project as such is now clearly linked to UNDP goals and strategies and SDGs, and relevant central and local level strategies and plans (see Table 2 below), but this link needs to be strengthened and detailed in the project document as well.

⁶ Law on KACA, Law on High Officials Assets and Income Declarations, Law on Political Party Financing, Law on Disciplinary Liability of Judges and Prosecutors

⁷ E-tool for monitoring PEPs; E-tool for case management system of preliminary investigations within KACA; E-tool for direct access for the Office of the Chief Prosecutor to financial and criminal records within the Police, Tax Administration, Customs Administration, Cadastre

Chart 1 – The new revised Theory of Change model



In the new ToC the **first outcome** focuses on development of policies, legislation, plans and strategies in line with international standards on anti-corruption in order to enable anti-corruption institutions to oversee integrity and transparency of central and local institutions and of political parties. The outcome 1 theory of change is that if selected institutions are supported to develop policies, legislation, plans and strategies in line with international standards on anti-corruption and aided in their implementation and monitoring, then anti-corruption institutions will demonstrate increased compliance with principles of integrity, transparency and improved capacities to suppress corruption. This is because of the policy and legislative framework once implemented will close existing loopholes for corruption and ensure increased integrity and transparency through integrity plans, and various e-tools e.g. asset declarations etc.

The **second outcome** focuses on strengthening the anti-corruption institutions and providing them with the capacity and tools to effectively detect and combat corruption. The outcome 2 theory of change is that if relevant anti-corruption institutions operate in line with an improved policy and legislative framework and have improved capacities and tools to detect and reveal corruption then

these institutions will have the capacities to seize illicit assets and to ensure their repatriation to the public budget.

The **third outcome** focuses on strengthening civic engagement mechanisms to hold public institutions accountable. The outcome 3 theory of change is that if civic engagement mechanisms are established and used through initiatives on corruption reporting, referral and monitoring, on transparently displaying public expenditure and increased awareness on how corruption is tackled, then the public institutions will be more influenced to be accountable to citizens to follow anti-corruption rules and procedures.

The underlying factor for success of the overall theory of change is sufficient political will, strong legal and administrative framework and sufficient capacity to implement the anti-corruption agenda with particular focus on suppression of corruption.

Evaluating the theory of change, it has been found: Due to a shift of focus from corruption prevention to corruption suppression the original theory of change has been obsolete and the actual theory of change has been reconstructed within the framework of this evaluation. An evaluation of this reconstructed theory of change shows that the hypothesis are plausible, the strategic reference framework is well anchored in the concept and the expected results (outcomes, outputs) are clearly defined. However, there is a need to clearly elaborate the assumptions and risks in line with this reconstructed theory of change.

Table 2. Link to relevant strategies and plans.

| UN/UNDP | Key priorities/targets |
|--|---|
| <p>SDG Goal 16 (direct contribution/main goal):</p> <p>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p> | <p>Target: 16.5 Substantially reduce corruption and bribery in all their forms</p> <p>Indicators:</p> <p>16.5.1 Proportion of persons who had at least one contact with a public official and who paid a bribe to a public official, or were asked for a bribe by those public officials, during the previous 12 months</p> <p>16.5.2 Proportion of businesses that had at least one contact with a public official and that paid a bribe to a public official, or were asked for a bribe by those public officials during the previous 12 months</p> <hr/> <p>Target: 16.6 Develop effective, accountable and transparent institutions at all levels</p> <p>Indicators:</p> <p>16.6.1 Primary expenditures as a proportion of original approved budget, by sector (or by budget codes or similar)</p> <p>16.6.2 Proportion of the population satisfied with their last experience of public services</p> |

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| SDG Goal 16 (indirect contribution, through integrity plans) | <p>Target: 16.7 Ensure responsive, inclusive, participatory and representative decision-making at all levels</p> <p>Indicators: 16.7.1 Proportions of positions (by sex, age, persons with disabilities and population groups) in public institutions (national and local legislatures, public service, and judiciary) compared to national distributions</p> |
| SDG Goal 16 (indirect contribution, through legislative support and support to Kallxo and GAP) | <p>Target: 16.10 Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements</p> <p>Indicators: 16.10.2 Number of countries that adopt and implement constitutional, statutory and/or policy guarantees for public access to information</p> |
| <p>Goal 17 (indirect contribution, through international agreements on access to databases e.g. PEP database).</p> <p>Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development</p> | <p>Target: 17.6 Enhance North-South, South-South and triangular regional and international cooperation on and access to science, technology and innovation and enhance knowledge-sharing on mutually agreed terms, including through improved coordination among existing mechanisms, in particular at the United Nations level, and through a global technology facilitation mechanism</p> <p>Indicators: 17.6.1 Number of science and/or technology cooperation agreements and programmes between countries, by type of cooperation</p> |
| UN CDP 2016 – 2020 | Outcome 2.1: Institutions responsible for delivering public services and social justice are accountable and responsive to rights holders (through SAEK Outcomes 1 and 2) |
| Priority Area 1: Governance and Rule of Law | Outcome 2.2: Key civil society actors increasingly influence the accountability of governance for public services and social justice (through SAEK Outcome 3) |
| Central level | Key priorities/targets |
| National Development Strategy (2016 - 2021) | Pillar 2: Good Governance and Rule of Law Target 14: Increased judicial efficiency |
| Kosovo Anti-corruption Strategy 2013 – 2017 | All objectives, in particular, regarding implementation of Integrity Plans and Asset Declaration |
| Kosovo Anti-corruption Strategy 2018 – 2022 (pending approval) | |

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| Kosovo Strategy Against Organized Crime 2012 – 2017 and 2018 – 2022 | In particular regarding the role of the FIU, which is responsible for receiving, analysing and disseminating information related to money laundering and terrorist financing. |
| Kosovo Strategy for the Prevention of and fight Against Informal Economy, Money Laundering, Terrorist Financing and Financial Crimes 2014 – 2018 | In particular regarding the role of the FIU, which is responsible for receiving, analysing and disseminating information related to money laundering and terrorist financing. |
| Local level | Key priorities/targets |
| Kosovo Anti-corruption Strategy 2013 – 2017 | Implementation of Integrity Plans and Asset Declaration at the local level |
| Kosovo Anti-corruption Strategy 2018 – 2022 (pending approval) | |

Actions undertaken under each outcome bare a significant degree of local ownership both in terms of demand for change and contribution to change. This is particularly evident at the Outcome 3, whereby the Kallxo.com platform has been proposed, designed and functionalised entirely by the Internews CSO during SAEK I, whereas SAEK II continued to strengthen the research capacities of the platform and production of related TV shows. Similarly, the legislative amendments undertaken (under the Outcome 1) and development of e-tools (under Outcome 2) have been initiated and demanded by the local stakeholders, whereas the project provided the necessary technical support in enabling change. As such, all actions undertaken in this regard are demand driven and reflect the needs of the target group, and remain highly relevant interventions in a foreseeable future as well.

In sum, the project is highly relevant to the situational context, tackling key problems at the central and local level through the three components. The project is well aligned with UNDP and national strategies as well as target group priorities. The research conducted by the Evaluation Team (ET) shows that there is a high demand to strengthen institutional capacities to deter, detect and sanction corruption involving institutions and public officials, which is fully in line with the objective of the project. An evaluation of the reconstructed theory of change shows that the hypothesis are plausible, the strategic reference framework is well anchored in the concept and the expected results (outcomes, outputs) are clearly defined. However, there is a need to clearly elaborate the assumptions and risks in line with this reconstructed theory of change.

5.2 Effectiveness

The evaluation of the effectiveness criterion focused on the extent the project has achieved its goal and expected results. For this purpose the following questions have been analyzed:

- Is the project on track to achieve its expected results (outputs, outcomes)? What has been achieved?
- What challenges have been faced? What has been done to address the potential challenges/problems?
- Have the capacity development measures served the needs and demands of the stakeholders?
- In what ways could the project improve its efforts in the second half of project's implementation toward achieving the expected results (outcomes, outputs)?

The effectiveness criterion has been assessed against the evaluation matrix analyzing data gathered from semi-structured interviews and document review.

In order to evaluate whether the project is on track to achieve its expected results (outputs, outcomes) progress achieved has been evaluated against the RFF.

The project's overall objective is to develop institutions that are able to deter, detect and sanction corruption involving institutions and public officials. In line with the theory of change, this approach is manifested through enhancing the policy, regulatory and monitoring framework on prevention and suppression of corruption (outcome 1), in supporting anti-corruption institutions in detecting and processing anti-corruption cases effectively (outcome 2), and in strengthening civic engagement mechanisms to hold institutions accountable (outcome 3).

The evaluation at the outcome level led to the following findings:

| Outcome Indicator | Target | Progress achieved |
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| <i>Outcome 1: Policy, regulation and monitoring framework on the prevention and suppression of corruption enhanced</i> | | |
| 1.1 Number of anti-corruption policies and laws developed in line with UNCAC and relevant international standards and adopted by the responsible anti- | Five laws fully in line with UNCAC and international standards by 2020 shows the following: | During the implementation period the CoI entered into force, the Law on Judges Liability has been amended and is awaiting president's signature; the Law on Political Party Financing has been approved by the Kosovo institutions and is awaiting approval of the Assembly of Kosovo; the amendments to the Law on KACA and the Law on High Officials Assets and Income Declaration are in the process of being drafted by the MoJ working group. Consequently, three laws have been drafted and are awaiting final approval, while two additional laws are in the drafting process |

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| corruption bodies by 2020, | | and expected to be completed by April 2019. Considering that the project is going to run until mid-2020, solid progress has been achieved and it can be expected that this indicator will be fully achieved. |
| 1.2 Number of measures completed of the Action Plan of the Anti-Corruption Strategies 2013-2017 and 2018-2022 | 70% in 2017 of the first strategy, 25% in 2020 of the second strategy | While 70% of measures have been completed in the Anti-Corruption Strategy 2013-2017, the newly drafted Anti-Corruption Strategy 2018-2022 has not been fully adopted yet. The central level authorities have approved it in March 2018, but due to a technical error in the request sent to the Assembly of Kosovo it has not yet been approved. It is expected that the Assembly of Kosovo is going to approve the Anti-Corruption Strategy 2018-2022 in the upcoming period. Considering that the implementation of measures of the new Strategy is on-going, it seems to be likely that this indicator will be met. |
| 1.3 Number of public institutions that have completed integrity plans and undergone a monitoring review by the KACA (at least 25 public institutions until 2020 | 25 integrity plans adopted and 10 monitored by 2020 | While 21 central institutions and municipalities adopted integrity plans, so far no systematic approach to monitoring the implementation of integrity plans has been applied. The low monitoring is due to the fact that the approach to integrity planning has changed from a UNDP-driven approach to a nationalised approach to be led by the KACA. Although progress is solid and it seems likely that the indicator will be achieved there is a risk that the momentum on implementing adopted integrity plans will be lost (details see obstacles). |
| Outcome 2: Anti-corruption institutions detect and process corruption cases effectively | | |
| 2.1 Percentage of asset declarations made electronically and number of red flags generated | 50% e-declarations by 2020 | The following progress has been made in implementing this indicator: Legal amendments have been drafted to introduce e-declarations; IT database developed for case management system and e-declaration system; data migration is underway, training of KACA staff is on-going, and troubleshooting of the e-tool is underway. If the implementation continues on the same path and if relevant stakeholders commence using the e-tool, it can be assumed that this indicator will be achieved. |
| 2.2 Number of sectors that have undergone a corruption risk assessment | 5 corruption risk assessments by 2020 | So far four corruption risk assessments have been conducted, namely, the assessment on the extractive industries, on GLPS Kosovo Accreditation Agency, on the Chamber of Advocates, and the National Risk Assessment for Money Laundering. It is envisaged that |

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| | | a corruption risk assessment on Notaries (2019) and on Bailiffs (2020) will be conducted in the upcoming period. Considering the smooth implementation of this indicator, it is expected that this indicator is going to be achieved. |
| 2.3 Number of analytical reports and communications on corruption published by institutions | KACA and Office of the Chief Prosecutor continue to publish annually, and conduct regular communications activities in line with relevant strategies | 4 KACA round tables with CSOs and the media (2 each) have been held till 2018, as well as regular quarterly press conferences. OCP has had 7 press conferences - 1 per each regional office and Pristina, as well as <i>ad hoc</i> press conferences by the Chief Prosecutor. Communication strategies have been adopted by both KACA and the OCP. 10 prosecution spokespersons have been appointed and each has undergone one-on-one on the job training, and a workshop on public speaking in 2018. |
| Outcome 3: Civic engagement mechanisms to hold institutions accountable strengthened | | |
| 3.1 Number of cases of corruption identified, processed and made public through kallxo.com | Maintain or increase number of cases processed per year | Since the beginning of the implementation the number cases received increased from 250 in 2015 to 788 in 2018. Out of these 788 cases 192 have been verified, while additional 392 are in the process of being verified. In 2018, 391 reports received, 125 follow-ups with institutions and 20 impacts have been generated. Overall, since the beginning of the implementation in 2016, 3455 reports from citizens have been received, 986 have been verified leading to 591 follow-ups with institutions that resulted in 98 impacts. |
| 3.2 Number of viewers of kallxo.com media products on corruption (TV shows, online articles) | Number of viewers maintained or increased per year | From 1 January 2018, until 26 December 2018, 29,206.145 viewers have visited kallxo.com As reported by staff at kallxo.com, if comparing to 2017, there has been an increase in viewership by 14,000,000 viewers. |
| 3.3. Number of institutions publishing budgets and expenditures in a user friendly format on a regular basis | 30 municipalities and all anti-corruption institutions publish in user friendly format | All municipalities, central institutions and independent bodies/agencies have published their expenditures in a user-friendly format, for the year of 2017 and 2018. With the support of GAP, 22 central level institutions, 33 independent agencies, 38 municipalities have their budgets transparently presented on the GAP institute website. |

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| 3.4 Number of active GOPAC members and public sessions held | 10 active GOPAC members, and 3 public sessions | <p>The following has been achieved regarding this indicator: There have been nine GOPAC members in 2016, while membership dropped to four 2018 due to elections. The following public events have been organized:</p> <ul style="list-style-type: none"> • One public event in 2016 launching the chapter, • Two public events in 2017 on anti-corruption journalism award and gender based budgeting with women’s caucus, • One in 2018 on promotion of SDG manual including a discussion on Anti-corruption Legislation with MPs and CSOs |
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In line with the assessment conducted above the implementation of the outcome indicators are well on track and it is likely that the project is going to achieve its goal.

Looking at the output level the evaluation found the following:

Output 1.1 Anti-corruption legislation developed and capacities for implementation fostered

The project has achieved the following progress: It supported the development of the Anti-corruption Strategy including the corresponding Action Plan (2018- 2022). The completed Strategy and Action Plan for the first time had a proper assessment of challenges in each sector, listed concrete activities and measurable targets and provided a timeline and indicative budget. This is a vast improvement on Kosovo’s previous strategies and action plans. Once the amendments to the Law on the KACA are passed, and the KACA is mandated with monitoring implementation, the Strategy will be the key guiding policy on anti-corruption for Kosovo and the public and CSOs will be able to track progress.

Upon request by the Office of the Prime Minister, the project provided support amending the Law on Financing Political Entities/Law on General Elections. The lack of transparency and non-existent monitoring and oversight presented the largest remaining legislative gap in Kosovo’s anti-corruption framework. Within the framework of the working group on developing the amendments to this law, the project actively contributed to improving this law. During the reporting period, three rounds of public consultations (for Political Parties, CSOs, International Organizations and public sector institutions) were held at which all feedback was gathered, responded to or incorporated into the draft amendments. The project also served as the facilitator of communication with the Council of Europe’s Venice Commission and the Office of the Prime Minister in placing the Law on the Venice Commission’s agenda and navigating the formal request procedure which Kosovo has never done before. The Venice Commission’s Opinion on the Draft Amendments to the Law on Financing of Political Entities was extremely positive, and outlined a number of recommendations which have been incorporated in the law. The amended Law on Financing

Political Entities/Law on General Elections has been approved by the institutions and is awaiting the approval of the Assembly of Kosovo.

The project has supported drafting the amendments to the Law on the Anti-corruption Agency, the Law on High Officials Assets and Income Declarations. The proposed amendments to the Law on the Anti-corruption Agency would increase the mandate of the KACA and re-conceptualize of the corruption prevention system. The new law would introduce corruption proofing of legislation and creating a legal framework for submitting and monitoring integrity plans. Additionally, it will introduce an e-assets and income declarations system for public officials thereby making submission, monitoring and public access much easier. Regarding the Law on Public Officials Assets and Income Declarations, the proposed amendments will give the authority to the Agency to issue sanctions and introduce an e-assets and income declaration system that is part of the project's support to the KACA. The process of drafting the aforementioned laws is on-going and should be completed by April 2019.

The UNCAC GAP Assessment aims at assessing legal and policy gaps against the UNCAC. As a non-signatory, Kosovo has started the UNCAC GAP analysis on a voluntary basis. Yet, the implementation of this activity has been interrupted due to time commitments of the authorities to complete the GRECO assessment. It is envisaged to complete the UNCAC GAP assessment by December 2019.

The project completed the development of 21 integrity plans for central level institutions and municipalities. At the municipal level, the project supported the development of 17 integrity plans through close co-operation and establishment of relationships with municipal authorities. Municipalities valued the benefits of developing integrity plans as preventive measures which helped them to increase trust through increased transparency and accountability. The project also supported the implementation of the integrity plans. For example, in Prishtina municipality the project supported the e-recruitment/E-Rekrutimi (www.erekrutimi.net), the online job application web-app, and Prishtina Digjitale, (Digital Prishtina), the Android and iOS mobile app on municipal spending, latest news and a web-app on digitalising cultural grants.

At the central level, the project developed integrity plans with the Assembly of Kosovo, Ministry of Internal Affairs, Kosovo Police, Anti-Corruption Agency, and Kosovo Privatisation Agency. The work on the integrity plans has been ceased due to a shift of focus of the project on corruption suppression and nationalising the development, implementation and monitoring of integrity in line with the new Law on KACA.

Overall, there is sound progress on achieving all set indicators for this output. This is also due to the hands-on approach of the project team working closely with key stakeholders to draft legislation and policy. Considering the track record on implementing this output, it is likely that this output will be achieved by the end of the project implementation.

Output 1.2 Anti-corruption monitoring framework established and functioning

The project aims at establishing a comprehensive anti-corruption monitoring framework. Assessing the results achieved on anti-corruption monitoring framework established and functional (output 1.2), the evaluation found the following:

Establishing a monitoring mechanism to oversee the effective implementation of the Anti-Corruption Strategy and its Action Plan (2018-2022), will depend on their adoption. Yet, monitoring of the implementation of anti-corruption policy was previously conducted through the Prime Minister's High Level Dialogue monthly meetings in 2018. This process has been completed with the support of an embedded UNDP adviser in the PM's office. Considering that it is expected that the new Anti-Corruption Strategy will be adopted in the upcoming period, it can be assumed that the target on monitoring the implementation of the Anti-Corruption Strategy and its Action Plan will be met.

Work on the e-integrity tool will commence in 2019. It will provide the KACA with the possibility to monitor the implementation of integrity plans of central level institutions and municipalities. The implementation of this e-tool is envisaged for 2019/2020 and it is likely that the target stating that at least five public sector institutions will use this tool is going to be met. This is due to the fact that institutions and municipalities, which already developed integrity plans are interested in continuing to work on the implementation. Moreover, according to the new Law on KACA the development of integrity plans will be mandatory and KACA will monitor the implementation.

While the corruption-proofing tool has been developed, the implementation of corruption proofing of legislation has not commenced. However, there is high-interest of key stakeholders, in particular, the KACA, the Office of the Prime Minister and the Ministry of Justice, in taking the lead and being involved in corruption proofing of legislation. In order to ensure the effective implementation of corruption proofing it is required to determine the institutional roles in corruption proofing. Considering the sound buy-in and interest of key stakeholders, it can be expected that the implementation of this indicator will move ahead.

The project supported the development of sentencing guidelines, which will provide for an additional tool to monitor corruption cases. Following the participatory development of these sentencing guidelines within the framework of a working group, the guidelines have been adopted in 2018. The monitoring of the sentencing practice is underway and should be continued through 2020 based on which a review of the sentencing guidelines will be carried out.

Considering the overall progress in the implementation of this output, it is likely that this output will be achieved.

Output 2.1 E-mechanisms for corruption detection and processing established

Aiming at increasing the effectiveness, efficiency and transparency in corruption detection and processing the project aims at establishing an e-declaration system, e-PEP database, KACA e-case management and an e-tool for accessing criminal and financial records. The following progress has been achieved: Establishing an e-declaration system commenced in 2018, and it is envisaged that this process is going to be completed by 2019. Replacing the current paper-based

assets and income declaration system, it is expected that 50 percent of high public officials declare assets on the online system by 2020. In case the e-declaration system is user-friendly leading to efficiency gains of all stakeholders, it can be expected that the implementation will go ahead as envisaged.

The e-tool for monitoring PEPs is functioning by providing access to a global database used by FIUs and law enforcement agencies. This monitoring mechanism has been only established in December 2018. However, considering the high interest of FIU in using database it can be expected that this tool will be used to monitor at least 10 cases per year. This is mainly due to the fact that it provides FIU with new opportunities and increased efficiency to monitor PEPs.

Establishing an e-tool with the KACA for case management system of preliminary investigations should increase the efficiency of KACA in this field. Depending on the functionality and user-friendliness of this tool, it is expected that the paper-based system is going to be replaced by 2020.

Establishing an e-tool for the Office of the Chief Prosecutor to access criminal and financial records is another mechanism supported by the project. Providing e-access to financial and criminal records within the Police, Tax Administration, Customs Administration, Cadaster aims at improving the capacities of the Chief Prosecutor in investigating corruption cases. During 2018 the legal framework (an interagency MoU) was drafted by SAEK in December 2018 and presented to all of the Agencies. The MoU is expected to be signed early 2019. There is no formal adoption process needed, only signatures by all heads of institutions. It is expected that the IT system will be completed in 2019. While the Chief Prosecutor is highly interested in using this tool, its effective use will depend on the capacities of staff investigating corruption cases. If needed capacities are built, it is expected that the target of 20 individuals investigated using the e-tool is going to be achieved.

Overall the findings on progress achieved on output 2.1 show that the project will most likely achieve its targets if e-tools are user-friendly leading to efficiency gains of all stakeholders involved and capacities of staff using e-tools is built.

Output 2.2 Analytical and specialized investigative capacities in relevant institutions established

Establishing analytical and specialized investigative capacities in relevant institutions aims at contributing to improved detection and processing of corruption cases. Evaluating the progress of the implementation led to the following results: The project conducted a series of trainings and developed training courses for financial crime/corruption investigators as follows: Financial investigation specialized course completed in 2016 (25 investigators); Tax Evasion specialized course completed in 2017 (40 investigators); specialized courses on grand corruption together with CEELI completed in 2017 and 2018 (3 courses, 11 investigators); Accredited Licensed Fraud Examination and Forensic Accounting course completed in 2018, (45 investigators). With these results the project already met the target of 30 licensed fraud examiners within investigative bodies and 50 trained through specialized courses. In this connection, it also needs to be pointed

the approach of the project to establish a Accredited Licensed Fraud Examination and Forensic Accounting course is seen as particularly valuable to foster criminal investigative capacities in the long-run.

Developing a publication on typologies of money laundering of Politically Exposed Persons (PEPs) aims to illustrate trends of how corrupt officials are misusing the financial system to hide illicit proceeds. It has been developed based on common types of money laundering involving PEPs in Kosovo and presented to over 50 officials from the police, prosecution, tax administration, customs administration, Financial Intelligence Unit, Anti-corruption Agency, Central Bank, and private banks. The purpose of this publication is to help the private sector discern suspicious financial activities involving PEPs, and law enforcement and the judiciary better understand how this type of white collar crime is being committed in order to improve prosecution and adjudication. The feedback on this publication has been very positive. Overall, the work on the PEPs to increase investigative capacities has successfully been completed.

During the implementation period, three corruption risk assessments have been conducted, namely, the assessment on the extractive industries, on GLPS Kosovo Accreditation Agency, and on the Chamber of Advocates. It is envisaged that a corruption risk assessment on Notaries (2019) and on Bailiffs (2020) will be conducted in the upcoming period. Considering the smooth implementation of this indicator, it is expected that this indicator is going to be achieved.

The project supported developing the Kosovo Money Laundering National Risk Assessment through surveys, input by the Ministry of Finance Working Group on the NRA, chaired by the FIU. The NRA analyzes risks, threats and vulnerabilities within all financial and non-financial institutions for the period 2015-2018. The final document, once adopted by the Ministry of Finance will be submitted to Moneyval, FATF and used to educate private sector reporting entities, and develop an action plan for strengthening Kosovo's anti-money laundering regime. While the implementation of the Kosovo Money Laundering National Risk Assessment has been completed in December 2018, it is envisaged that the Minister of Finance will adopt it in 2019 completing the implementation of this indicator.

In order to identify problems in investigations, prosecution and adjudication and provide recommendations for improving the handling of cases an in-depth review of 20 completed corruption cases commenced in August 2018 and will continue through 2019. Upon completion of this review it is envisaged to submit the review to the President of the Supreme Court and the Chief Prosecutor.

Capacity enhancement of the Office of the Disciplinary Prosecutor to effectively and efficiently investigate allegations of misconduct by judges and prosecutors supported through three legal researchers and 20 interns to help with reviewing cases till 2017. Due to the adoption of new Law on the Disciplinary Liability of Judges and Prosecutors in 2018 that will transfer the mandate to another body, work with the Office of the Disciplinary Prosecutor has been ceased in 2018. The SEAK project will ensure that all ongoing cases are transferred to the new body and then to cease work in this area. With this activity the implementation in this field has been completed.

Considering the sound track record of the implementation of this output, it is likely that the set indicators will be met.

Output 2.3 Effective institutional communication on corruption cases established

This output aims at strengthening the communication of the Chief Prosecutor and the KACA on corruption cases. During the implementation period the following has been achieved: With the support of an embedded communication advisor, the project developed in partnership with KACA a communication strategy in 2017 and conducted two public relations events with media and CSOs in 2018. The project also supported through an embedded advisor the development of a communication strategy within the prosecution. In order to strengthen the communication of the prosecution, 10 spokespersons have been appointed and trained on public speaking within each regional prosecution office. As the majority of targets for the set indicators have been accomplished, it is very likely this output will be achieved. The only pending activities are four more PR and communication events to be conducted by KACA.

Outcome 3 Civic engagement mechanisms to hold institutions accountable strengthened

Output 3.1 Civic engagement platforms for corruption reporting, referral and monitoring supported

This output aims at supporting the civic engagement platform kallxo.com for corruption reporting, referral and monitoring. The project supported kallxo.com to improve its reporting platform by developing and launching a corruption-reporting app available for both Android and iOS platforms. This app is a new corruption-reporting tool, which is directly linked to the main kallxo.com database where corrupt cases are stored. The project also facilitated meetings between kallxo.com and other anti-corruption institutions to discuss anti-corruption cases and improve the referral and monitoring processes.

Since the beginning of the implementation of SAEK II, 3,455 reports have been received by kallxo.com; whereas the team of researchers managed to verify 986 cases leading to 591 follow-ups with institutions, which resulted in 98 impacts. In order to foster the impact of the work of kallxo.com the project aims at increasing the verification rate of potential corruption cases reported on kallxo.com. The baseline for this output indicator has been 10% of cases that have been reported and processed are verified, while the current verification rate is at 25 % and it is expected that all cases will be verified to meet the target of this indicator. Consequently, there is still need to increase the verification rate in order to achieve this output.

Output 3.2 Awareness on how corruption is tackled is increased

This output aims at increasing awareness on how corruption is tackled. The implementation builds on a series of innovative anti-corruption awareness raising activities, which have been transformed into activities aiming at increasing awareness on how corruption is being tackled. To this end, the project supports developing and airing the TV show the prosecutor, an award on investigative journalism in the field of corruption, and developing the GOPAC chapter.

The following progress has been achieved: The implementation of this output initially focused on increasing citizens' awareness on corruption and following activities have been implemented:

- Grants on awareness raising have been provided to civil society organisation in 2017 and 2018;
- In line with the recommendations of the Corruption Risk Assessment in Education with the Ministry of Education, the project supported developing and disseminating education materials for youth especially women and vulnerable /marginalized groups, on active citizenship;
- Innovative awareness raising activities such as data cuisine, game over, and an innovation challenge on corruption have been held, the Anibar Transparency Animation Workshop has been conducted, a Corruption Museum has been established and an OpenData/Transparency workshop have been held;
- A communications campaign for the Kosovo Association of Patients' Rights (PRAK) has been conducted.

Recognising the benefits and limits of externally supported awareness raising activities, this series of activities has been transformed into activities aiming at increasing awareness on how corruption is being tackled. To this end, the following activities have been implemented.

The TV show “the prosecutor” aims at increasing awareness of general population that the prosecutor by law is to lead criminal investigation, and not by the police as is the current perception. In line with the set indicators the TV show the prosecutor has been produced and nine episodes have been aired and additional three produced. In order to increase awareness and recognise the importance of investigative journalism, an award for investigative journalists who produce stories about corruption has been established and three anti-corruption journalism awards have been conducted within the framework of the international anti-corruption day. The GOPAC Chapter has been established and four public hearing events on anti-corruption have been organised. While 3,360 citizens filed corruption complaints through kallxo.com (baseline data from September 2014) and 40,000 citizens kallxo.com on Facebook, the number of citizens actively engaging in anti-corruption measures increased to 174,826 Facebook followers (January 2019) and 13,940 Youtube subscribers (September 2018). This constant increase in citizens following anti-corruption information and actively engaging with kallxo.com shows an increase interest in awareness on how corruption is tackled. Accordingly, this output has been already partly achieved, i.e. indicators 3.2.2 to 3.2.5 have been achieved while indicator 3.2.1 on the tv show the prosecutor is progressing well.

Output 3.3 Public expenditure transparently displayed

The main aim of this output is to ensure that public expenditure is transparently displayed. To this end the project has supported the GAP institute in establishing a user-friendly online service that allows people to view and understand how public budgets are spent in relation to budgetary planning. The GAP institute also educates students and the public on budget making and spending processes. The support of SAEK II resulted in 22 central level institutions, 33 independent agencies, 38 municipalities have their budgets transparently presented on the GAP institute website. With these achievements the targets set for this output have been met.

In sum, there is solid progress at the outcome and output levels. Therefore, it is likely that the project is going to achieve its expected results (outcomes, outputs).

Key achievements

While there has been constant progress in the implementation, the following key achievements have been established based on an analysis of semi-structured interviews and project documents:

- Key stakeholders see the project team as a trusted partner who provides hands-on participatory advice, in particular, in drafting legislation and policy. This also allowed the project to focus on sensitive issues such as a review of 20 past corruption cases and establishing of inter-institutional cooperation.
- Development of comprehensive anti-corruption institutional and legal framework and e-tools aiming at covering main gaps in the system and working with all anti-corruption institutions. This approach is crowned with establishing e-platforms expected to lead to significant efficiency gains.
- Kallxo.com is a key mechanism increasing demand in anti-corruption measures and holding anti-corruption institutions accountable. Kallxo.com established itself as one of the most trusted anti-corruption platforms, which is very popular among the population. According to a survey conducted by UBO Consulting for measuring citizens' perceptions on whom they trust in fighting corruption, kallxo.com is the second most trusted institution in Kosovo, following the Kosovo Police. It developed a very effective approach on receiving, investigating and monitoring corruption cases. Innovative shows such as "The Prosecutor" contribute to increasing transparency and accountability of key anti-corruption stakeholders such as the Chief Prosecutor.
- Well-targeted capacity building measures such as the accredited fraud and forensic accounting course developed and implemented in cooperation with SKAAK.
- Contribution to knowledge management within UNDP. The project has shared its experience and approach upon request of the UNDP Istanbul Regional Hub, UNDP country offices in Georgia, Korea, and Ukraine.

Key challenges

While overall progress in the implementation of the project is solid, the following challenges have been encountered during the implementation of the project:

- Introducing changes in the policy and regulatory framework, and strengthening anti-corruption institutions require political will and commitments to reforms that would address roots causes of corruption. Yet, lack of political will to combat corruption effectively is still one of the major challenges the project has faced. For example, the project developed a "non-paper on re-conceptualizing the institutional framework for the flight against corruption". This paper aims to contribute to changing the anti-corruption architecture in Kosovo. It analyzes the need to reshuffle the institutional architecture of the main bodies dealing with the prevention and suppression of corruption and give them the power to effectively combat corruption. While strengthening the institutional set-up in combatting corruption could contribute to the fight against corruption, key stakeholders lacked political will to take this idea forward. This shows

that the lack of political will is a major obstacle in the fight against corruption, which has also been pointed out in the last report of the European Union (EU). Accordingly, the lack of political will prevents tangible results in tackling endemic corruption in Kosovo (EU, 2016). In order to increase the political will the project has supported the Prime Minister's High Level Dialogue meetings on anti-corruption, and organized public hearings by the AoK Legislative Committee and GOPAC. In addition, SAEK organizes regular Partnership Briefings with all key international stakeholders to discuss policy issues and agree to joint positions. SEAK's work with civil society aims to impact public opinion, which in turn can positively influence political will.

- Resistance to change is another challenge the project has encountered. The project has contributed to developing an improved policy and regulatory framework and strengthened institutions to combat corruption. Through its participatory approach the project team established trust with key stakeholders who have increased their understanding of the benefits of improving their policies, regulations and capacities in order to effectively combat corruption. Yet, achieving tangible results in the fight against corruption will depend on commitments to change and implement the improved policy and regulatory framework. The project envisages focusing the last six months of its implementation on supporting the implementation of improved anti-corruption policy and regulatory framework. Considering the complexities of the developed policy and regulatory framework, six months will most likely not be sufficient to achieve tangible results.
- UNDP had contributed to the policy reform agenda and tackled some real issues through various dissemination of findings events engaging at high level of decision making through that process. As a development organization, in comparison to major diplomatic missions and donors, UNDP remains is less able to effectively push for major reforms in the field of anti-corruption. While the project has closely cooperated with the Swiss delegation to Kosovo to gain more political clout, key international players such as the European Union and the United States of America dominate this field. Efforts in this direction have been made through partnership meetings and should continue for the remaining period of the project.
- Changing the focus of the project from corruption prevention to corruption suppression resulted in ceasing activities on integrity plans and developing an approach to nationalize integrity planning. While this approach decreases dependence on international assistance in the long-run, a transitional strategy needs to be developed allowing to develop the necessary capacities at the national level and avoiding losing momentum on implementing existing integrity plans.
- While the project established and maintained solid working level relations with most anti-corruption institutions, the Ministry of Justice – as another key player in Kosovo's anti-corruption architecture – could improve its willingness to cooperate with the project. The issues with the Ministry of Justice are due to their unwillingness to take the lead in the UNCAC process with the explanation that Kosovo is not a UN Member State and that their other activities are priorities (e.g. functional review, GRECO evaluation). Yet, the project has succeeded in building relations with the Ministry of Justice in the following areas: (1) the Ministry of Justice has requested SAEK to take the lead in drafting the new KACA Law and the Law on Assets and Income Declarations; (2) the Ministry of Justice legal officers have

undergone SAEK training on corruption proofing of legislation and have requested additional support in this area.

- On the civil society side aiming at creating demand for anti-corruption reforms the environment is rather hostile towards anti-corruption investigations and civil society leaders such as the head of Kallxo.com encountered threats.

In sum, most of the identified challenges are adequately addressed by the project as measures have been developed to tackle the challenges/problems, which hindered the effective implementation. Key challenges such as lack of political will to effectively combat corruption is very difficult to effectively address. Therefore, tangible results in combatting corruption will depend on political will.

The capacity building measures served the needs and demands of the stakeholders. This is due to a very demand-driven and participatory approach: All of the capacity development exercises were developed through a series of discussions/meetings with the heads of all relevant institutions. The usual process has been that the SAEK project has received requests from relevant heads of institutions for areas of training. Based on these requests, the project team developed the proposed curricula and presented it to the relevant heads of institutions for comments and acceptance. Tailor-made trainings to prosecutors and investigative authorities to specialize on handling corruption cases and other anti-corruption bodies have been developed in participatory manner with key stakeholders and based on international standards. For example, the Tax Evasion and Financial Investigation courses were developed jointly with US FBI special agents, US IRS special agents, and an ex-UK Metropolitan Police (Scotland Yard) agent. The project discussed with the heads of the police, prosecution, tax administration what their needs were, developed case studies and a training course and presented it to the heads of relevant institutions for their review and acceptance. The feedback has been very positive. Regarding the accredited course on fraud examination/forensic accounting, the SAEK project team held meetings with all of the heads of institutions to explain to them this field and how it is the cutting edge of financial investigation and is used by EU member states and the US. The course was split into two modules. Module 1 was based on Kosovo law and was developed by SCAAK as a modified version of their regular courses on accounting and auditing. Module 2 was developed by a licensed fraud examiner who designed the course to follow the international standard Accredited Certified Fraud Examiner's (ACFE) course. The aim here was to ensure that our course was in compliance with the international standard and to prepare our participants for taking the international course in the future. There was large interest in this course and a waiting list of investigators who wanted to attend. Therefore, the project had to turn away 20 investigators due to a lack of space. This highly participatory approach of developing training and capacity development measures shows that the needs and demands of stakeholders have been fully respected, while considering the objectives and available resources of the project.

Aiming to ensure overall aid coordination, UNDP has organized and jointly chaired with SDC partnership briefings on anti-corruption with relevant international donors and organizations on a quarterly basis. These partnership briefings have served as a forum to discuss upcoming initiatives, to develop synergies, and to discuss strategic policy priorities, current events, and

proposed legislation. In addition, a specific timely topic is identified for each meeting and one of the partners is invited to provide a short briefing on their work. Partnership briefings are comprised of all key development partners that deal with anti-corruption.

These partnership briefings provide an effective platform for exchanging information on on-going projects, programmes, policies and approaches to combat corruption. Due to the fact that there are only a few key donors and international organizations focusing on anti-corruption such as the European Commission, USAID and CoE, the project is in constant contact with the aforementioned stakeholders. On the policy level the project has regular meetings with representatives of the US embassy and EULEX. Moreover, some of the key stakeholders such as KACA and FIU focus on donor coordination in order to avoid overlaps and duplication of projects.

On the implementation of commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability the evaluation found: Mechanisms for ensuring accountability are a close alignment of the project's work with Kosovo's Anti-corruption Strategy and Action Plan, and the legislative agenda. This also ensures ownership as all project interventions are linked with the Anti-corruption Strategy and Action Plan and the legislative agenda. This way the project team makes sure that its work is in line with Kosovo's priorities and that the authorities themselves set deadlines, responsible institutions and estimated budget cost. Moreover, the SAEK project has held regular meetings with all relevant heads of institutions to discuss their priorities, needs and the project's planned interventions to ensure that this is completely in line with their annual plans. Alignment and harmonization of aid is ensured through partnership briefings and regular meetings with all other anti-corruption projects. This allows the SAEK project to ensure that activities complement each other and that there is no overlap. Moreover, all four key partners -Prosecution, KACA, FIU, Supreme Court - develop their own priorities and coordinate with each of the projects to ensure that they are provided with the support that they need and that there is no overlapping or competition. Management for development results is ensured UNDP Assistant Resident Representative oversees the project and ensures that results are in line with the Country Development Plan. Furthermore, the project contributed to knowledge management within UNDP and shared its experience and approach upon request of the UNDP Istanbul Regional Hub, UNDP country offices in Georgia, Korea, and Ukraine.

In conclusion, the evaluation of the effectiveness criterion showed that the project is well on track to achieve its expected results (outcomes, outputs). The project implementation resulted in a track record of achievements such as the development of comprehensive anti-corruption institutional and legal framework and e-tools aiming at covering main gaps in the system and working with all anti-corruption institutions. Moreover, support provided to kallxo.com shows tangible results making the platform the second trusted anti-corruption actor in Kosovo. Furthermore, the competent, demand driven and participatory approach of the project team make them a trusted partner of key stakeholders providing access to sensitive issues. While the project implementation progresses smoothly challenges such as lack of political will, resistance to change, lack of sufficient political clout have been identified. Most of the identified challenges are adequately

addressed by the project as measures have been developed to tackle the challenges/problems, which hindered the effective implementation. Key challenges such as lack of political will to effectively combat corruption is very difficult to effectively address, while tangible results in combatting corruption will depend on political will of key stakeholders. Commitments to promote ownership, alignment and harmonization aid, management for development results and mutual accountability are all anchored and reflected in mechanisms to ensure the effective project implementation.

5.3 Efficiency

The evaluation of the efficiency criterion focused on the extent the project's use of resources is appropriate with regard to the outputs and outcomes achieved. To this end, the following four questions have been evaluated in line with the terms of reference:

- Are the management and administrative arrangements sufficient to ensure the effective implementation of the project?
- Have the roles and responsibilities been clearly defined and described?
- How well have the various activities transformed the available resources into the intended results in terms of quantity, quality and timeliness? (in comparison with the plan)

The efficiency criterion has been assessed against the evaluation matrix analyzing data gathered from semi-structured interviews and document review. The approach chosen to evaluate the efficiency criteria is the expert judgment⁸ which is based on a focused analysis of the project document and the implementation of annual work plans.

On that the management and administrative arrangements the evaluation found that the project is managed through the following structures:

- The UNDP SAEK Project Team under a Direct Implementation Modality (DIM) has carried out the management of the project. Accordingly, UNDP is responsible for the overall management and administration of the project, primarily with regard to the responsibility for the achievement of the outputs and the stated outcome. UNDP has delegated managerial duties for the day-to-day running of the project to the Project Manager, selected by UNDP through a competitive and transparent selection process.
- There are two oversight structures:
 - A management meeting composed of UNDP senior management, SAEK, SDC and DANIDA that meets immediately prior to every board meeting to discuss implementation of the project, risks to be encountered, and to make policy level decisions.
 - The board (or steering committee) composed of beneficiaries, donors, SAEK and UNDP senior management. This decision making body discusses and decides upon strategic issues pertaining to annual work plans, impacts on outcomes, revisions to the annual work plans and budgets to ensure activities and interventions remain pertinent to needs and achieve optimum results.

⁸ Details on expert analysis see: Palenberg, M. (2011): Tools and Methods for Evaluating the Efficiency of Aid Interventions, *Evaluation Working Papers*. Bonn: Bundesministerium fuer wirtschaftlichen Zusammenarbeit und Entwicklung.

- Partnership briefings serve as donor coordination platforms. These meetings serve as a forum to discuss upcoming initiatives, develop synergies, and discuss strategic policy priorities, current events, proposed legislation. In addition, a specific timely topic is identified for each meeting and one of the partners is invited to provide a short briefing on their work.

These management arrangements provide an efficient set-up to ensure a participatory approach in managing the project and to coordinate strategic decisions and interventions with key stakeholders.

On clearly defined roles and responsibilities, the evaluation found that the project document foresees a project team consisting of project management and technical advisor roles and responsibilities as follows:

Project management

- *Project Manager* - responsible for managing the capacity development of and ties with institutions/partners at the national and local levels, providing guidance and expert inputs into all outcomes, achieving the overall project outputs and day-to-day management of the project;
- *Project Officer* - responsible for Outcome II and taking lead in judicial integrity and gender considerations throughout the project
- *Project Officer* - responsible for Outcome III and taking lead on innovation and usage of non-conventional media throughout the project, as well as responsible for the overall communication and outreach of the project.

Technical advisors

- *International Chief Technical Advisor* - deployed for the duration of project implementation as the a higher-level practitioner, with experience in anti-corruption preventive bodies in other countries, and able to advise both the direct beneficiaries and the project team on best ways to proceed with shaping and implementing concrete activities responsible for strategic-level advice and transfer of knowledge and skills to the project team and ensuring the monitoring and evaluation on regular basis;
- *Anti-Corruption Advisor* (responsible for Outcome I and taking lead in all thematic anticorruption areas of project implementation, assisting the team with quality assessment of the products delivered with project support);

Organizational, HR, procurement, IT and other related issues will be provided by UNDP Kosovo through a Project Associate working specifically for the project.

Quality Assurance is provided by the UNDP programme team supporting the project team by ensuring appropriate project management milestones are managed and completed. The UNDP Deputy Programme Coordinator and Governance & Peacebuilding Portfolio Manager holds the Project Assurance role according to the project document.

This organisational structure provides for a clear definition and division of roles and responsibilities. However, it was never put in place.

The organisational structure of the project looks as follows:

- International Chief Technical Advisor: Responsible for strategic-level advice, for technical advice to both the direct beneficiaries and the project team on best ways to proceed with shaping and implementing concrete activities, responsible and transfer of knowledge and skills to the project team. The CTA joined in summer 2016.
- Project Manager: From May 2016 until November 2018, the roles and responsibilities of the project manager also included significant technical advisory responsibilities, as the project manager was heavily involved in developing the corruption suppression elements of the project and providing advice on legislative and policy drafting. The project manager resigned in November 2018. However, he will continue working with project as a Senior Legal Adviser on corruption suppression.
- Project Officer: The roles and responsibilities of the project officer have included work on integrity plans, legislative committee, GOPAC, UNCAC gap assessment and selected corruption risk assessments such as with the bar association.
- Project Associate: Since December 2017 this position supports the implementation of the project focusing on organisational, logistical and administrative issues.
- Junior Professional Officer: Since December 2018 a junior professional officer has started to support the project team focusing on visibility and communications.

Quality Assurance and oversight responsibilities lie with the Assistant Deputy Resident Representative due to the comprehensive nature and the complexities of the project.

Comparing the current staffing structure with the originally envisaged one, it appears that the original staffing structure would have provided the project more staff and a clearer division of technical and project management functions. This is due to the fact that the original staffing structure envisaged two instead of currently one staff member on technical advice and three instead of currently one staff member focusing on project management.

Assessing the administrative and management further, the evaluation found that providing the project manager with technical advisory responsibilities has led to challenges in fulfilling all responsibilities with equal dedication, in particular, at times requiring significant technical support. Consequently, some project management responsibilities such as knowledge management, monitoring and evaluation, ensuring visibility of the project have not been fully realized. It is expected that the recruitment of a fulltime project manager will address this issue and provide for a more efficient organisational structure of the project.

The remaining roles and responsibilities have been divided in line with the needs arising from the implementation of the project. Accountability for project results could be increased by clearly providing staff involved in technical advisory work and capacity building with distinctive portfolios in line with the reconstructed theory of change. This would imply providing staff members with the responsibility to implement selected outputs and outcomes.

Due to the nature of the project requiring significant administrative, logistical and organisational support, the division of roles and responsibilities could be increased leading to an improved workflow and efficiency gains.

In sum, the findings on management and administrative arrangements and definition of roles and responsibilities demonstrated that there is a need to strengthen the project management role as already foreseen with the current vacancy for the position of project manager.

Evaluating how well have the various activities transformed the available resources into the intended results in terms of quantity, quality and timeliness (in comparison with the plan) the evaluation resulted in the following findings: An analysis of the implementation of annual project work plans found that the implementation of activities transformed available resources using efficient approaches leading to intended results. Particularly, the technical advice provided by project staff in the drafting of essential policy and legislation such as the new anti-corruption strategy and the law on political party financing led to efficiency gains. This is due to the fact that resources for external consultants have been saved, while the project team deepening relations with key stakeholders, efficiently used their expertise in providing technical advice. This approach is particularly efficient as it resulted in high quality deliverables and the expected quantity due to participatory approaches and high-level technical input. Compared to the originally planned approach of using external consultants this approach demonstrates to be of value added as direct technical advice provided by the project team has certain advantages such as: External consultants first need to fully understand the complexities of combatting corruption in Kosovo, and establish a relationship with relevant key stakeholders, while the project team already has both a deep understanding of Kosovo specific issues and trust of key stakeholders.

Additionally, the project's approach of using seven embedded advisors in key institutions to provide technical expertise and mentoring⁹ demonstrated to be an efficient use of resources to achieve expected results. This is due to the fact that the embedded advisors provided everyday support and were incorporated as full staff members within relevant institutions. The embedded advisors were used to support one-to-one trainings and transfers of knowledge. Additionally, the embedded advisors provided the project team with day-to-day information about the needs and functioning of the institutions. This approach allowed the project team to address the needs of

⁹ The following embedded advisors have been supported key institutions: Anti-Corruption Agency, (2 experts: legal adviser and communications and PR); Office of Prime Minister, (1 anti-corruption adviser); Supreme Court, (1 legal officer); Office of the Disciplinary Prosecutor, (3 legal officers, through March 2018).

the institution in a tailor-made and time manner. Hence contributing to the quality of the implementation.

Moreover, the approach of the project to provide tailor made long-term training courses to prosecutors and investigative authorities to specialize on handling corruption cases and other anti-corruption bodies is an efficient way to achieve the intended results with the available resources. According to project staff the SCAAK accredited annual course on fraud examination and forensic accounting provided the best quality of all trainings conducted within the framework of the project. This is due to the mix of local and international trainers, local practice and international standards and the accreditation for those participants that passed the course. It was deemed that the amount of time, effort and cost of putting together a three day training far outweighed that of developing curricula, going through the accreditation process and delivering a year long course through SCAAK.

Furthermore, conducting regional activities such as within the framework of RAI or studies visits to neighboring countries is an efficient way to use the resources to achieve the intended results. Particularly, study visits to Albania such as to the Albanian High Inspectorate for Assets and Income Declarations demonstrated to be efficient to foster the implementation of the project.

While these activities and approaches transformed the available resources into the intended results in terms of quantity, quality and timeliness (in comparison with the plan) in an efficient manner, the approach taken regarding integrity planning shows some room for improvement. According to the work plan the project envisaged to support local and central institutions in developing integrity plans. During the first year of the implementation of SEAK II 17 integrity plans have been developed for municipalities and central level institutions. To this end, a consultancy company was hired which supported relevant institutions in developing integrity plans. The decentralized bottom-up approach on developing integrity plans has been changed an institutionalized top down approach due to the following reasons: It was reassessed that the project should first develop the policy and legislative framework making integrity planning mandatory and providing KACA with the mandate to monitor the implementation of integrity plans. The project assumes that this approach would allow them to measure results of the implementation and thus go beyond the mere adoption of integrity plans. Furthermore, the shift of focus from corruption prevention to corruption suppression required the project team to focus more resources on corruption suppression at the expense of integrity planning.

Institutionalizing the development of integrity plans is certainly a precondition to ensure that integrity plans including their implementation become a regular practice. Yet, ceasing all activities on integrity planning without any support to institutions with integrity plans bears the risk that integrity plans will not be implemented and the resources invested at the beginning of the project implementation have not been used efficiently. In this connection, it is also important to point out that some activities previously envisaged such as involving NGOs as watch-dogs to monitor the implementation of integrity plans could have been an efficient transition approach to foster the implementation of integrity plans.

During the first year of the project implementation various innovative anti-corruption awareness-raising activities have been conducted. The focus on awareness raising has been significantly decreased within the framework of changing the focus from corruption prevention to corruption suppression. Organizing the anti-corruption journalism award is one of the few remaining awareness raising activities and one of the highlights of the international anti-corruption day. Yet, this activity is very time and resources intensive. In order to increase the efficiency of this activity it would be required to either start earlier with the preparations or to hire an additional part time staff member just for this award. This is needed as all project staff were engaged in reviewing submissions, translations, scoring stories and organizing the event within a short amount of time. A company was hired to run the facebook page, voting and logistics. Considering the significant use of resources, the approach of organizing the anti-corruption journalism award should be changed to increase the efficiency of the use of resources.

Some decreases in efficiency are linked to external changes such as a new law on the Disciplinary Liability of Judges and Prosecutors providing the Office of the Office of the Disciplinary Prosecutor with a new mandate. It remains to be seen whether the support provided to this institution will be efficient.

The majority of resources have been used efficiently with regard to achieving the intended results in terms of timeliness. Yet, a few results have not been achieved in time due to the fact that relevant legislation and policy have not been adopted so far. Moreover, the UNCAC gap assessment has been put on hold as potential lead institutions such as the Ministry of Justice and KACA have not been in the position to take the lead. This is due to the fact that both institutions are busy with other priorities and the UNCAC gap assessment is not a priority as non-UN member state.

Summarising the evaluation of the efficiency criterion the following findings have been brought: On management and administrative arrangements and definition of roles and responsibilities there is a need to strengthen the project management role as already foreseen with the current vacancy for the position of project manager. This position has been re-advertised due to lack of applications from suitable candidates. If necessary, considering the complexity of the project, the position needs to be upgraded from the current SB4 level to SB5 level. On the analysis of how well have the various activities transformed the available resources into the intended results in terms of quantity, quality and timeliness (in comparison with the plan) the evaluation found: The project's use of its own resources in terms technical advice is a very efficient approach to ensure high quality and timeliness of intended results. Also, the use of embedded advisors, development of annual accredited training courses are approaches and regional activities resulting in achieving intended deliverables in terms of quality, quantity and timeliness. Yet, the evaluation also found that there is room for improvement regarding the approach to integrity plans and the anti-corruption journalism award. While the majority of resources have been used efficiently with regard to achieving the intended results in terms of timeliness, a few results have not been achieved in time due to the fact that relevant legislation and policy have not been adopted so far.

5.4 Potential for impact

The potential for impact criterion focuses on the extent the project might have long lasting changes and benefits. For this purpose the following key questions have been analyzed:

- Has the project appropriately reached its target groups? Is the project serving the needs of vulnerable groups, i.e. women, youth, minorities?
- To what extent did the project contribute to behavioral changes and motivation of key stakeholders regarding corruption prevention and corruption suppression?

The project actions undertaken under the three outcomes carry significant potential for impact in decreasing the level of corruption in targeted public institutions, which is the desired impact of the project.

To this end, the project has been successful in establishing an enabling environment for corruption prevention and suppression by engaging with key anti-corruption institutions in defining the necessary legal environment and mechanisms/tools for deterring, detecting and sanctioning corruption involving institutions and public officials, which is the key objective of the project.

At the institutional level there is evidence that the project has appropriately reached its target group i.e. anti-corruption institutions and as such the institutions are fully responsive to the actions undertaken, which enables long lasting desired changes and benefits in the following aspects:

Outcome 1:

Kosovo Anti-corruption Agency (KACA): The project is strengthening the KACA's mandate and providing it with tools to fulfill a corruption prevention role, in terms of allowing for full preliminary investigations into assets and income declarations; issuing of administrative sanctions for violations regarding conflicts of interest, assets and income declarations; issuing opinions on public procurement procedures; conducting corruption proofing of legislation; monitoring of integrity plans and the implementation of the Anti-corruption Strategy and Action Plan, by which it will more easily detect violations, sanction them and deter further corruption. In this regard, the legislation is being amended, an e-declaration system is being developed, and the staff structure is being reorganized and trained on their new competencies.

Central/Local institutions: The project is assisting selected central and local institutions in developing Integrity Plans to systematically address integrity risks, with the goal of strengthening institutional resistance to corruption and thus, reducing corruption levels. The project is also establishing jointly with KACA a monitoring and reporting mechanism on evaluation and implementation of integrity plans, which is expected to enter into force in 2019.

Office of the Prime Minister/Central Election Commission: The project is establishing a fully functioning auditing and monitoring system by which an independent body within Central Election Commission will oversee political parties' campaign and regular financial reports, sanction violations, and allow the public to access information on what persons or companies are donating to which parties during election cycles and regular operations in non-election years. The Law on Political Party Financing is expected to be adopted in 2019.

Outcome 2:

Office of the Chief Prosecutor (OCP): The project is developing i) a fully functioning communication system throughout all prosecution offices with appointed spokespersons; ii) a set group of accredited fraud investigators/forensic accountants within investigatory agencies (Tax, Customs, FIU, KACA, Police, Prosecution) who, as part of joint investigation teams, can track illicit funds, and support trials through serving as court appointed experts; and iii) a secure and closed data access system by which a selected number of prosecutors can directly access databases from the Tax, Customs, Police, Cadastre to extract criminal and financial data for the purposes of corruption investigations without tipping off anyone in these institutions of who the target is and what data is being viewed.

Financial Intelligence Unit (FIU): The project jointly with the FIU is conducting a proper assessment of the risks/threats/vulnerabilities of the anti-money laundering system, which would allow for informed policy changes both at the private and public sector levels that would in turn lead to better allocation of resources into identifying money laundering. The FIU is being enabled to conduct thorough investigations into Politically Exposed Persons (PEPs) assets and share this information with law enforcement, and KACA.

Supreme Court: The project jointly with the Supreme Court has developed sentencing guidelines with clear aggravating and mitigating circumstances for each criminal offense pertaining to corruption, organized crime, financial crime which will guide judges in reaching an appropriate sentence and also inform appellate courts in deciding whether initial sentences were properly decided. Moreover this will eliminate possibilities for judgments to be skewed through corruption and political influence.

A proper assessment of deficiencies in investigative and court procedures will allow an informed policy making procedure on how to reform the justice sector so as to create a track record of successful grand corruption cases and seized criminal assets.

Outcome 3:

Internews/Kallxo.com: The project is strengthening the Research Unit of the online platform Kallxo.com to manage the information flow on www.kallxo.com and coordinate follow-up activities with responsible anti-corruption bodies. The project will also roll-out and presence of Kallxo.com platform in 38 municipalities in Kosovo through established cooperation agreements with small CSOs and local media operating across Kosovo. Through project monitoring and coordination mechanisms, support is being provided to Kallxo.com team and the anti-corruption institutions on sharing of information on corruption cases and follow-up.

Assembly of Kosovo Legislative Committee/GOPAC: The project is providing training and legal review support to the Legislative Committee on reviewing legislation and conducting hearings on anti-corruption issues and oversight hearings over the KACA.

The project is also supporting the establishment of a GOPAC chapter and support in organizing public hearings with cross-party support on such issues as passing anti-corruption legislation, the functioning of anti-corruption measures.

In sum up, the project has been successful in establishing an enabling environment for corruption prevention and suppression by engaging with key anti-corruption institutions in defining the necessary legal environment and mechanisms/tools for deterring, detecting and sanctioning corruption involving institutions and public officials, and by strengthening effective civic

engagement mechanisms to hold institutions accountable which is the key objective of the project. Yet, it needs to be noted that various empirical studies on the impact of corruption prevention and suppression approaches and tools in aid demonstrated that purely legal approaches to anti-corruption (such as setting up autonomous anti-corruption agencies, political party financing) do most likely only have a limited immediate impact in state-captured environments such as Kosovo where corruption is the norm. However, increasing the independence of the judiciary, establishing e-tools, increasing budget transparency and social accountability through kallxo.com have more potential to have immediate impact.¹⁰

With regard to what extent is the project addressing the needs of vulnerable groups i.e. women, youth and minorities, it is evident that Kallxo.com platform and TV shows provide an interactive medium which enables the population, especially youth to influence corruption related issues and increase their civic engagement and social responsibility, thus contributing to behavioral changes and motivation of youth regarding corruption prevention and suppression. Through these means, the project seeks to address the demand side of democratic governance and use the potential of proactive transparency to generate engagement, by capitalizing on the capacities of citizens, activists and civil society organizations in Kosovo. Similarly, the project has been proactive in engaging with Serb majority municipalities in development of the Integrity Plans, and has managed so far to introduce them in Gracanica/Gracanice, Klokot/Klllokot and Novoberdo/Novoberde municipalities, whereas the northern Serb majority municipalities have yet to join due to political reasons. However, due to lack of monitoring data, it's less evident to what extent the project is addressing the needs of women beyond gender mainstreaming of activities.

In summary, evaluating the potential for impact criterion shows that the project has been successful in establishing an enabling environment for corruption prevention and suppression. While contributing to decreasing corruption in state-captured environments as in Kosovo, is extremely challenging the project devised some approaches, which have particular potential for impact according to research findings¹¹. Accordingly, approaches focusing on increasing judicial independence, establishing e-tools, increasing budget transparency and strengthening social accountability through kallxo.com and GAP have solid potential to have impact. While the project reaches vulnerable groups and minorities, in particular, through kallxo.com and TV shows, it lacks a fully developed strategy on how to address the needs of women beyond gender mainstreaming.

5.5 Sustainability

The evaluation of the sustainability criterion focused on the extent the benefits of the project are likely to continue after the project has ended. To this end, the following four questions have been evaluated in line with the terms of reference:

¹⁰ These are the findings of the ANTICORRP project (2013-17) one of the largest social science framework research projects of the European Union. ANTICORRP is systematically assessed the impact of public anticorruption tools and their enabling contexts. The findings are public and can be found at: Alina Mungiu-Pippidi, 2018: Seven Steps to Control of Corruption: The Road Map, available at: https://www.mitpressjournals.org/doi/abs/10.1162/daed_a_00500; European Journal on Criminal Policy and Research, Volume 22, Issue 3, September 2016, <https://link.springer.com/article/10.1007/s10610-016-9322-1> and the special issue November 2018 of Crime, Law and Social Change on evidence-based anti-corruption, <https://link.springer.com/journal/10611>.

¹¹ Ibid.

- How will the project ensure sustainability of its results when the project will have ended (i.e. continuity of developed capacities, use of knowledge, improved practices, implementation of policies, strategies, laws, plans developed within the framework of the project etc.)?
- What has been achieved in institutionalizing the acquired knowledge and skills?
- To what extent has the project led to a change of behaviours and motivations in terms of paying attention to marginalised and vulnerable population groups.
- Does the project have a concrete and realistic exit strategy to ensure sustainability?

The sustainability criterion has been assessed against the evaluation matrix analyzing data gathered from semi-structured interviews and document review.

The evaluation found the following: On the question how the project will ensure sustainability of its results when it will have ended, the evaluation found that UNDP SEAK project team developed a holistic approach to tackling corruption. Accordingly, a strong emphasis has been put on developing an anti-corruption system that is there to remain. In line with the theory of change, this approach to anti-corruption is manifested through enhancing the policy, regulatory and monitoring framework on prevention and suppression of corruption (outcome 1), in supporting anti-corruption institutions in detecting and processing anti-corruption cases effectively (outcome 2), and in strengthening civic engagement mechanisms to hold institutions accountable (outcome 3). These three main intervention logics have the following different implications regarding how the project will ensure sustainability of its results when the project will have ended.

On enhancing the policy, regulatory and monitoring framework on prevention and suppression of corruption (outcome 1), in particular, on anti-corruption legislation and policies developed and capacities for implementation fostered (output 1.1) the project has achieved the following progress: It supported the development of the Anti-corruption Strategy including the corresponding Action Plan (2018 - 2022) and the amendments to the Law on Financing Political Entities/Law on General Elections. Both require to be adopted by central institutions and the Assembly in the upcoming period. Furthermore, the project has supported drafting the amendments to the Law on the Anti-corruption Agency, the Law on High Officials Assets and Income Declarations and the UNCAC GAP Assessment. The process of drafting the aforementioned laws is on-going and should be completed by April 2019, while the UNCAC GAP Assessment is envisaged to be completed by December 2019. Moreover, the project completed the development of 21 integrity plans for central level institutions and municipalities. (revised ToC)

The project rests on the idea that developing/amending above mentioned legislation and policies aims at closing existing gaps in the anti-corruption system of Kosovo, thus increasing its effectiveness, efficiency, impact and sustainability. Yet, this will only be possible if the above-mentioned laws and policies are finalized, adopted and implemented. The current approach of the project has mainly focused on supporting the drafting process in a participatory manner. Furthermore, the project has systematically pushed for the adoption of the laws through close cooperation with the Office of the Prime Minister on central institutions approval and the Assembly (Legislative Committee) on parliamentary adoption.

Considering the overall implementation gap of policies and legislation in Kosovo (ECPR 2018) and the partially significant changes in mandate and scope of work of key institutions such as the Kosovo Anti-Corruption Agency, the timeframe of ensuring sustainability is not sufficient. Furthermore, at this stage of the implementation the project has not developed a comprehensive approach on how to ensure the effective and efficient implementation of aforementioned policies and laws. This pertains particularly the Kosovo Anti-Corruption Agency, which will be in charge of implementing the amended Law on Anti-corruption Agency and the Law on High Officials Assets and Income Declarations, and monitoring the implementation of the Anti-corruption Strategy. While the project supports the Kosovo Anti-corruption Agency in establishing e-tools on asset declaration, in monitoring of integrity plans, the implementation of the above mentioned laws and policies will require an increase of KACA staff from currently 40 to 70 staff members. These new staff members will need to be trained due to the fact that experienced candidates with relevant expertise are rarely available on the job-market in Kosovo.

According to the amendments to the Law on Financing of Political Entities/Law on General Elections, setting up a dedicated focal point in the CEC who is going to oversee and monitor the implementation of the law is required. In order to ensure the effective implementation of the law the project envisages the following approach: Developing a manual for political parties and the CEC on their responsibilities and how to implement the new law. This will be followed by developing an IT system for political parties to submit their campaign and regular funding reports. As last step, it is envisaged that the new CEC staff will be trained on how to perform their monitoring function. However, the Law is set for adoption in 2019 and there will only be one year from its adoption until it comes into force. Therefore, it is very likely that no staff will be hired for us to train before the project ends. In order to ensure the effective implementation of the law the project foresees training of new CEC staff in 2020, to have the IT system in place and the legal implementation manual ready for political parties on how to implement their new tasks. In case of delays in the implementation the project developed a contingency plan, namely, involving the Westminster Foundation for Democracy in training of new CEC staff. While there is only a short-time period to ensuring the effective implementation of the law, the project already developed a contingency plan on how to ensure sustainability.

On the integrity plans the evaluation found that most of the 21 central and municipal level institutions that developed integrity plans would require additional support to ensure their sustainability. This pertains mainly to smaller institutions, however, even bigger institutions such as Pristina municipality expects support from UNDP in the implementation of the integrity plan. In this connection, it is crucial to point out that shifting focus moving from corruption prevention to corruption suppression resulted in ceasing direct support to developing and implementing integrity plans. While the project – as part of the strengthened focus on corruption suppression - foresees to move to a nationalized system on integrity plans led by KACA, there is a need to ensure a step-by-step transition from the UNDP-driven to the nationalized system. This transitional approach is particularly required as most developed integrity plans and corresponding action plans have not been linked to the budget of the institution. Not reflecting the integrity action plan in the budget of the institution bears significant sustainability risks as integrity action plans will not be implemented

in a comprehensive manner. Moreover, it seems that not all institutions involved in the development of integrity plans are fully aware of the project's new approach. The nationalized system to integrity plans envisages that integrity plans are mandatory according to the amended Law on KACA and that KACA is going to monitor the implementation of the integrity plans. In order to ensure the development of the integrity plans it is foreseen to develop a train-the-trainer system on integrity plans led by KACA. However, it will take some time to make this approach fully functional, in particular, as the law has not been adopted yet and the monitoring and ToT system first need to be established. Therefore, an approach bridging the fully UNDP-led system to the national system is needed to ensure sustainability of the projects results.

Assessing the results achieved on anti-corruption monitoring framework established and functional (output 1.2), the evaluation found the following: The implementation of this output has only commenced on developing an e-integrity tool, corruption proofing and sentencing guidelines (indicators 1.2.2, 1.2.3, 1.2.4). At this stage of the implementation, the project did not establish an approach on ensuring the sustainability of achieved results beyond ensuring local ownership and participatory approach.

On corruption proofing of legislation there is high-interest of key stakeholders, in particular, the KACA, the Office of the Prime Minister and the Ministry of Justice, in taking the lead and being involved. In order to ensure sustainability of corruption proofing it is required to determine the institutions in charge of this tool.

Sentencing guidelines have been developed, adopted and are in used on a voluntary basis. In order to sustain the efforts on using the sentencing guidelines transparency and accountability on using the guidelines should be strengthened. According to the Supreme Court, the sentencing guidelines will need to be adjusted in line with the new Criminal Code to be adopted in 2019. Due to a lack of capacities, these amendments will need to be supported by UNDP. In order to ensure sustainability of the sentencing guidelines required institutional capacities will need to be built to regularly update the sentencing guidelines.

Assessing the results achieved on e-mechanisms for corruption detecting and processing established (output 2.1), the evaluation found the following: This output focuses on establishing the following e-tools to detect and process corruption cases: E-declaration system, PEP searchable database, KACA case management system, and E-tool for accessing criminal and financial records. While the development of all e-tools (but the one on PEPs) is on-going, sustainability of expected results can only be estimated. While the e-tool for monitoring PEPs is functioning by providing access to a global database used by FIUs and law enforcement agencies of assets held by PEPs and related persons, it only has fully been established in December 2018. In case all e-tools to be developed will be functional and demonstrate efficiency gains to the institutions using them, then it can be expected that the sustainability of these tools will be satisfactory. Therefore, it is of utmost importance to ensure that institutions using e-tools have needed capacities, while the tools need to be user-friendly and lead to efficiency gains.

Assessing the sustainability of results achieved regarding analytical and specialized investigative capacities in relevant institutions established (output 2.2), the evaluation found: Financial crime/corruption criminal investigators have been trained and specialized in conducting financial investigations through a series of training courses such as:

- The financial investigation specialized course completed by 25 investigators in 2016,
- The tax evasion specialized course completed by 40 investigators in 2017
- Specialized courses on grand corruption together with CEELI completed by 11 investigators in 2017 and 2018
- The accredited licensed fraud examination and forensic accounting course completed by 45 investigators in 2018.

The project trained 50 financial investigators and licensed 30 investigators in fraud. Within this process the project developed and institutionally anchored a fraud investigations course. The sustainability of this result will depend on the effective use of the trained, in particular, by the certified fraud examination and forensic accounting investigators. The project currently focuses on ensuring that the Chief Prosecutor is going to regularly use the certified investigators. Therefore, the sustainability of this result is still pending.

PEPs Typologies have been published and presented to key stakeholders. The sustainability of this typology will depend on its regular use. The FIU assesses the PEPs on corruption as very beneficial at national and international level as the PEPs Typologies resulted in receiving positive feedback on the international level as part of the EGMONT group. At this stage of the implementation the continued use of and the benefits gained through using the PEPs Typologies will determine the sustainability of this tool.

The project supported the following sectoral/institutional risk assessments (Indicator 2.2.3): Extractive industries, Chamber of Advocates, GLPS risk assessment of the Kosovo Accreditation Agency, FIU Money Laundering National Risk Assessment, AMCHAM Business Ethics survey and recommendations. Additionally, the SAEK project team served in working groups of the following sectoral risk assessments NGO Sector, Games of Chance Sector, Construction Sector. The sustainability of these corruption risk assessments will depend on the use of these reports and the implementation of the recommendations of the risk assessment reports. The project does not envisage any monitoring of the implementation of the recommendations of the corruption risk assessments carried out. Therefore, the sustainability of the achieved results cannot be further assessed. However, considering the low policy implementation rate it is likely that there is room for improvement in following up on the recommendations of the risk assessments.

The report on the review of corruption cases is in the process of being developed. Follow-up action will be required in order to ensure that recommendations are put into practice. This would also foster sustainability of this indicator.

While the capacity enhancement of the Office of the Disciplinary Prosecutor to effectively and efficiently investigate allegations of misconduct by judges and prosecutors has been ceased due

to the fact that the new law on the Disciplinary Liability of Judges and Prosecutors will transfer the mandate to another body. Due to these changes in the body responsible to investigate allegations of misconduct by judges and prosecutors, the support provided within the framework is no longer sustainable.

Evaluating how the project will ensure sustainability of effective institutional communication on corruption cases established, the evaluation team identified the following findings: With the support of an embedded advisor a communication strategy has been developed and two PR events with media and CSOs have been held. Based on this KACA will develop their own capacities in line with their new internal policy. This demonstrates that the efforts made by the project achieved a certain level of sustainability enabling KACA to continue building communication capacities by themselves.

The Chief Prosecutor's Office developed a communication strategy with the support of the project in 2018. The implementation of the communication strategy is envisaged until 2020. Considering the fact that an embedded advisor is supporting this work on PR and taking into account the benefits the Chief Prosecutor sees in effective communication, it is likely that the communication strategy will be implemented. The Communication Advisor has helped to implement the new Public Communication Strategy and spokespersons in charge of public communication have been recruited at all prosecution offices. At this stage, the Chief Prosecutor would need increased coordination to ensure the effective functioning of the communications system and gradual withdrawal of the Communication Advisor from PR duties. This would also contribute to the sustainability of the communications system of the OCP.

The findings on strengthening civic engagement mechanisms to hold institutions accountable (outcome 3), in particular, civic engagement platforms for corruption reporting, referral and monitoring supported (Output 3.1) are as follows:

This output refers to the work conducted by Kallxo.com, which is one of the most trusted institutions in Kosovo in fight against corruption. Kallxo.com is still completely dependent on donor funding and the sustainability of results achieved through its platform would be significantly impacted after the project ends. There is currently a lack of a strategy to ensure sustainability of the results achieved through Kallxo.com. However, assessing and implementing a business model not fully dependent on donor funds, would increase the sustainability of Kallxo.com.

Regarding public awareness and communication products developed and published (output 3.2) the evaluation found: The TV-show "The Prosecutor" is part of the Kallxo.com and faces the same sustainability issues as outlined above.

The anti-corruption journalism award celebrating the anti-corruption day is also fully depends on the project's funding and it should be considered to hand the celebration of the anti-corruption day over to relevant institutions or a leading CSO or a state institution.

On displaying public expenditure transparently, the evaluation found that the service currently provided by GAP depends on the funding of UNDP and it is unclear whether and how it would continue without the support of donor funds. Therefore, it would be required to develop an exit strategy with GAP.

In sum, the findings demonstrate the following: The project's systematic approach of improving the legislative and policy framework, and the effectiveness of anti-corruption institutions and of strengthened civic engagement mechanisms to hold institutions accountable, provides a solid basis to ensure sustainability of the anti-corruption system in Kosovo. Yet, the project lacks a coherent approach to ensure the sustainability of results once it has been ended.

On the question what has been achieved in institutionalizing the acquired knowledge and skills, the evaluation has established the following findings based on an analysis of activities resulting in increased knowledge and skills. In the following areas project activities resulted in increased knowledge and skills:

- Legislation and policies developed within the framework of the project (outcome 1, output 1.1)
- UNCAC GAP assessment (outcome 1, output 1.1)
- Integrity plans (outcome 1, output 1.1)
- Corruption proofing of legislation (outcome 1, output 1.2)
- Sentencing guidelines (outcome 1, output 1.2)
- Financial investigation training programme (outcome 2, output 2.2)
- Fraud examination and forensic accounting training programme (outcome 2, output 2.2)
- Typologies on money laundering of Politically Exposed Persons (outcome 2, output 2.2)
- Kosovo Money Laundering National Risk Assessment (outcome 2, output 2.2)
- Capacity enhancement of the Office of the Disciplinary Prosecutor (outcome 2, output 2.2)
- Institutional communication on corruption (outcome 2, output 2.3)
- Civic engagement platforms on corruption and accountability (outcome 3)

The following has been achieved in institutionalizing knowledge and skills acquired:

The project has provided significant support to key stakeholders in anti-corruption institutions by mentoring and involving them in drafting essential pieces of legislations and policies. This participatory approach builds lasting capacities and skills of stakeholders in key positions involved in the drafting process.

Efforts have been undertaken to institutionalize knowledge and skills gained on integrity plans and to ensure that this tool is used in the long-run. Yet, as pointed out above it is crucial to ensure a follow-up with institutions that already developed integrity plans in order to increase sustainability.

Relevant stakeholders gained increased knowledge and skills in corruption proofing of legislation. Due to the fact that the implementation on corruption proofing is still on-going and it has not been

determined which institution is going to take the lead in corruption proofing, skills and knowledge in this field will only be sustainable if/when institutionalized in the upcoming period.

While the Supreme Court acquired increased knowledge and skills on developing and implementing sentencing guidelines, the process of developing sentencing guidelines has not been institutionalized and it seems that there is a need to involve the project in developing revised sentencing guidelines once the new Criminal Code has been adopted.

The project provided a training programme on financial investigation (outcome 2, output 2.2) within framework of CEELI workshops. To what extent, the training will be sustainable will depend on the use of the trained investigators in the field of grand corruption.

Analytical and investigative capacities have been increased through a year-long certified fraud examination and forensic accounting course for 45 police, prosecutors, tax, customs and financial intelligence agents and investigative journalists. The aim of this training has been to build financial investigation capacities to identify corruption schemes and confiscate illicit proceeds. This accredited course developed and run in partnership with the Kosovo Association of Accountants and Auditors (SCAAK). SCAAK is the official professional association in this field and its courses are accredited by the Kosovo Accreditation Agency. While institutionalizing this certified fraud examination and forensic accounting course and ensuring that it is run by SCAAK is a solid foundation for ensuring sustainability, it still needs to be determined how the certified fraud examination and forensic accounting experts will be used. The project is currently following-up on this with the Chief Prosecutor and the President of the Supreme Court to ensure that those accredited are used for joint investigation teams and as court appointed experts (see also above).

The project resulted in an increased knowledge and awareness on Politically Exposed Persons which is institutionalized through the use of the PEP e-tool. Furthermore, with the support of the SAEK project the knowledge and skills of the Office of the Disciplinary Prosecutor to effectively and efficiently investigate misconduct by judges and prosecutors have been increased. However, due to a change in mandate of the aforementioned institution, the knowledge and skills will not be used in the Office of the Disciplinary Prosecutor, but through the new institutional set-up. While the SAEK project tries to ensure the sustainability of these results by transferring established capacities and skills to the new institution it is not clear whether this approach is going to succeed.

Moreover, the project put efforts on developing knowledge and skills on communication and PR. Particularly, the embedded Communication Advisors placed in KACA and the Office of the Chief Prosecutor played an important role in strengthening skills and knowledge in communication and PR. Establishing a communications and PR system in the Chief Prosecutors Office and appointing 10 spokespersons in prosecution services, ensures that the acquired knowledge and skills are institutionalized. Building on the skills gained in the project, KACA envisages further strengthening their communications work building on the skills acquired through the project. This also shows that the gained knowledge has been institutionalised.

Kallxo.com can be seen as institutionalized mechanisms for reporting, referral and monitoring of corruption cases. This platform provides a very solid foundation for ensuring sustainability of knowledge and skills gained on reporting, referral and monitoring of corruption cases. Yet, as pointed out above Kallxo.com is fully depend on donor funds.

In sum, the findings show that while skills and knowledge such as in kallxo.com and the communications functions of KACA and the Office of the Chief Prosecutor have been institutionalized, the next phase of the project implementation will need to pay particular attention to institutionalizing knowledge and skills in order to ensure the sustainability of the achieved results.

On the extent the project resulted in changes of behaviors and motivations in terms of paying attention to marginalized and vulnerable groups, the evaluation found the following: According to UNDP's progress reports on the project and semi-structured interviews, every intervention is gender mainstreamed. However, the project has run into challenges while ensuring gender mainstreaming throughout its activities given that it was hard to influence change in the composition of beneficiaries. It needs to be pointed out that these challenges were external, in the sense that the overall situation regarding gender equality in institutions is below the desirable 30%. Therefore, although the project insisted for at least 30% of participation of women in activities, at times this was not possible. In addition, most experts and heads of partner institutions were men, thus, making gender mainstreaming in activities challenging.

Beyond focusing on equal participation of men and women, the project also conducted activities on gender budgeting aimed at empowering women. The project also envisages activities (sexual exploitation and corruption at universities) focusing more directly on the role of women in corruption, which should contribute to a change in motivation and behaviours.

Regarding minorities, the project hired an embedded advisor for the municipality of Gracanica who also reached out to the remaining Serbian municipalities. This provided for the inclusion of Serbian minorities in the project, however, not resulting in a change of behaviour and motivation in terms of paying attention to vulnerable groups.

Indicating a change of behaviour, national counterparts involved in the project proactively nominate at least 30 percent of female participants and minorities if possible. Beyond this, the evaluation could not detect a change of behaviours and motivation in in terms of paying attention to marginalized and vulnerable groups. Yet, there is room to go beyond equal participation and focus more on empowerment of women and minorities, in particular, in situations that might involve women in corruption.

On a concrete and realistic exit strategy of the project, the evaluation established the following findings: The project has been designed focusing on the sustainability element, in particular, strengthening local ownership through participatory approaches in involving key stakeholders in the design of the project and its activities. Yet, a concrete exit strategy focusing on how to ensure the sustainability of the project's results is pending. Due to the fact that the project is going to run

for 1,5 years more the implications on sustainability are not significant at this stage. However, on mitigation measures proposed to address sustainability risks the evaluation found that the project lacks a risk management structure in line with the shift of focus on corruption suppression. Particularly, there is a need to elaborate sustainability risks and corresponding measures.

In sum, the findings on the evaluation of the sustainability criterion show that there is still room for improvement in order to ensure that the benefits of the project will continue after it has ended. On the positive side, the project’s systematic approach to anti-corruption on the supply and demand side provides a solid basis to ensure sustainability of the anti-corruption system in Kosovo. Yet, the project lacks a coherent approach to ensure the sustainability of results once it has been ended. This is particularly required considering the policy and legislation implementation gap, the risk of not effectively using e-tools and the donor dependence of Kallxo.com and GAP. Moreover, the findings show that there is room for improvement of institutionalizing acquired knowledge and skills. This is particularly needed as the project invested in capacity building programmes of financial crime, fraud examination and forensic crime experts. Additionally, more efforts are required to foster a change of behaviour’s and motivations in terms of paying attention to marginalized and vulnerable groups. Furthermore, a lack of a concrete and realistic exit strategy and sufficient mitigation measures on sustainability risks will hinder ensuring sustainability to the full extent possible.

VI CONCLUSIONS AND RATING

Based on the findings, the evaluation team has ranked the evaluation criteria using the UNDP Scoring Scale, with the overall score of 5: Satisfactory, with minor shortcomings.

The UNDP Scoring Scale is explained below:

- 6 = Highly satisfactory (HS): no shortcomings
- 5 = Satisfactory (S): minor shortcomings
- 4 = Moderately satisfactory (MS). Moderate shortcomings
- 3 = Moderately unsatisfactory (MU): Significant shortcomings
- 2 = Unsatisfactory (U): Major problems
- 1 = Highly unsatisfactory (HU): Severe problems.

OVERALL SCORE:

| | |
|---------------|--|
| Overall Score | 5: Satisfactory, with minor shortcomings |
|---------------|--|

RELEVANCE:

| | |
|----------------|---|
| Overall Rating | 5: Satisfactory, with minor shortcomings |
| Observations | The project is highly relevant to the situational context, tackling key problems at the central and local level through the three components. The project is well aligned with UNDP and national strategies as well as target group priorities. |

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| | <p>Yet, the level these strategies are referred to in the project document is relatively general. The research conducted by the Evaluation Team (ET) shows that there is a high demand to strengthen institutional capacities to deter, detect and sanction corruption involving institutions and public officials and to strengthen civic engagement mechanisms to hold institutions accountable. High relevance in terms of local needs, in line with national and local level strategies and UNDP, SDC and DANIDA priorities. The design of the project has been adequately adopted to the chosen goal. Due to a shift of focus from corruption prevention to corruption suppression, the original theory of change was deemed obsolete and as such has been reconstructed within the framework of this evaluation. The evaluation of this reconstructed theory of change shows that the hypothesis are plausible, the strategic reference framework is well anchored in the concept and the expected results (outcomes, outputs) are clearly defined. However, there is a need to clearly elaborate the assumptions and risks in line with this reconstructed theory of change.</p> |
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EFFECTIVENESS:

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|----------------|---|
| Overall Rating | 5: Satisfactory, with minor shortcomings |
| Observations | <p>The evaluation of the effectiveness criterion showed that the project is well on track to achieve its expected results (outcomes, outputs). The project implementation resulted in a track record of achievements such as the development of comprehensive anti-corruption institutional and legal framework and e-tools aiming at covering main gaps in the system and working with all anti-corruption institutions. Moreover, support provided to kallxo.com shows tangible results making the platform the second trusted anti-corruption actor in Kosovo after Police (Kallxo own survey). Furthermore, the competent, demand driven and participatory approach of the project team make them a trusted partner of key stakeholders providing access to sensitive issues. While the project implementation progresses smoothly tackles challenges such as lack of political will, resistance to change, the Swiss Embassy adds to project's political clout through interventions in high level meetings when necessary. Most of the identified challenges are adequately addressed by the project as measures have been developed to tackle the challenges/problems, which hindered the effective implementation. Key challenges such as lack of political will to effectively combat corruption is very difficult to effectively address, while tangible results in combatting corruption will depend on political will of key stakeholders. Commitments to promote ownership, alignment and harmonization aid, management for development results and mutual accountability are all anchored and reflected in mechanisms to ensure the effective project implementation.</p> |

EFFICIENCY:

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|----------------|--|
| Overall Rating | 5: Satisfactory with minor shortcomings |
| Observations | Summarising the evaluation of the efficiency criterion the following findings have been established: On management and administrative arrangements |

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| | <p>and definition of roles and responsibilities there is a need to strengthen the project management role as already foreseen with the current vacancy for the position of project manager. This position has been re-advertised due to lack of applications from suitable candidates. On the analysis of how well have the various activities transformed the available resources into the intended results in terms of quantity, quality and timeliness (in comparison with the plan) the evaluation found: The project's use of its own resources in terms technical advice is a very efficient approach to ensure high quality and timeliness of intended results. Also, the use of embedded advisors, development of annual accredited training courses are approaches and regional activities resulting in achieving intended deliverables in terms of quality, quantity and timeliness. Yet, the evaluation also found that there is room for improvement regarding the approach to integrity plans and the anti-corruption journalism award. While the majority of resources have been used efficiently with regard to achieving the intended results in terms of timeliness, a few results have not been achieved in time due to the fact that relevant legislation and policy have not been adopted so far. Overall, these findings show a sound level of efficiency.</p> |
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IMPACT (potential):

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|----------------|---|
| Overall Rating | 5: Satisfactory with minor shortcomings |
| Observations | Evaluating the potential for impact criterion shows that the project has been successful in establishing an enabling environment for corruption prevention and suppression. While contributing to decreasing corruption in state-captured environments as in Kosovo, is extremely challenging the project devised some approaches, which have particular potential for impact according to research findings ¹² . Accordingly, approaches focusing on increasing judicial independence, establishing e-tools, increasing budget transparency and strengthening social accountability through kallxo.com and GAP have solid potential to have impact. While the project reaches vulnerable groups and minorities, in particular, through kallxo.com and TV shows, it lacks a fully developed strategy on how to address the needs of women beyond gender mainstreaming. |

SUSTAINABILITY:

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|----------------|--|
| Overall Rating | 5: Satisfactory with minor shortcomings |
| Observations | The evaluation of the sustainability criterion is satisfactory with minor shortcomings. The findings show that there is still room for improvement in order to ensure that the benefits of the project will continue after it has ended. |

¹² For example, the ANTICORRP project (2013-17) has been one of the largest social science research projects of the European Union. ANTICORRP has systematically assessed the impact of public anticorruption tools and their enabling contexts. The findings are public and can be found at: Alina Mungiu-Pippidi, 2018: Seven Steps to Control of Corruption: The Road Map, available at: https://www.mitpressjournals.org/doi/abs/10.1162/daed_a_00500; European Journal on Criminal Policy and Research, Volume 22, Issue 3, September 2016, <https://link.springer.com/article/10.1007/s10610-016-9322-1> and the special issue November 2018 of Crime, Law and Social Change on evidence-based anti-corruption, <https://link.springer.com/journal/10611>

| |
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| <p>On the positive side, the project’s systematic approach to anti-corruption on the supply and demand side provides a solid basis to ensure sustainability of the anti-corruption system in Kosovo. Yet, the project lacks a coherent approach to ensure the sustainability of results once it has been ended. This is particularly required considering the policy and legislation implementation gap, the risk of not effectively using e-tools and the donor dependence of Kallxo.com and GAP. Moreover, the findings show that there is room for improvement of institutionalizing acquired knowledge and skills. This is particularly needed as the project invested in capacity building programmes of financial crime, fraud examination and forensic crime experts. Additionally, more efforts are required to foster a change of behaviour’s and motivations in terms of paying attention to marginalized and vulnerable groups. Furthermore, a lack of a concrete and realistic exit strategy and sufficient mitigation measures on sustainability risks will hinder ensuring sustainability to the full extent possible.</p> |
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VII LESSONS LEARNED AND RECOMMENDATIONS

Lessons learned

The **lessons learned** are built around the key features of the project that need to be maintained in future phases:

Embedded advisors: Physical presence of embedded advisors in the key institutions has proven to be a great value added proposition of the project, securing not only effective on-the-job capacity development, direct communication and follow-up with beneficiaries, but also an added quality assurance. Nevertheless, the project must be mindful of capacity substitution trap and ensure that there’s a clear exit strategy to such involvement.

Flexibility in approach: The project’s flexible approach in addressing emerging needs of the key stakeholders has turned the project into a trusted partner, enabling stakeholders to swiftly address any emerging issues, thus clearing obstacles to a successful accomplishment of the set objectives. In advancing further, the project must capture well and document these key turning moments into project reports.

E-tools and platforms: The project’s efforts in digitalizing the corruption reporting, tracking and investigation is enabling key anti-corruption institutions, as well as citizens to interact with one another much more effectively and at the same time adding to institutional transparency and accountability towards the citizens. During the next phase, the project must ensure higher degree of sustainability of use of such tools and platforms once the project has ended.

Shifting focus on integrity plans: The shift of focus from corruption prevention to corruption suppression entailed a change in approach on integrity plans moving from a UNDP-supported system to a national system on integrity plans. While the latter has potential to ensure

sustainability of integrity plans in the long-run, an incremental approach moving from the UNDP-driven system to a national system on integrity plans is required.

Establishing and maintaining a comprehensive approach to combatting corruption: While the project established a comprehensive approach on addressing gaps in the anti-corruption system and developing the corresponding policy and legislative framework, there is the need to develop a more coherent approach on ensuring sustainability of the newly established anti-corruption system. This is particular due to the significant policy and legislation gap and the lack of capacities to effectively monitor and report on the implementation of relevant policies and legislation.

Increasing impact: While establishing an enabling environment for corruption prevention and suppression, intervention areas providing for more impact such as increasing judicial independence, establishing e-tools, increasing budget transparency and strengthening social accountability through kallxo.com and GAP should be prioritised in this complex context of Kosovo.

Demonstrating competence and gaining trust: The solid competencies of the project team provided the project with access to get involved in sensitive issues and gain trust of key stakeholders. This approach should be maintained in the remainder of the project implementation.

Keeping low profile: Although, at a cost to project's visibility, the project managed to influence policy direction in several relevant areas, while keeping a low profile to not attract the reaction of "interest groups" that could potentially become obstacle to reforms. This approach proved to be successful and should be maintained in 'sensitive' areas of intervention.

Long-term commitment: The project collaborates with a large number of stakeholders on highly complex issues and thus requires longer-term commitment in order to ensure impact of the suppression approach.

Recommendations

The evaluation suggests that the project on oncoming future phases needs to undertake the following measures:

Increasing relevance

- Clearly elaborate the assumptions and risks in line with the revised reconstructed theory of change.

Strengthening effectiveness

While the overall approach of the project demonstrated to be effective in achieving the expected results (outcomes, outputs), the following could be improved in remaining implementation period:

- Develop a coherent approach fostering the adoption of the Anti-corruption Strategy, and the amended laws, in particular, the Law on Financing Political Entities/Law on General

Elections. In order to increase the needed political clout, closer cooperation with international key players such as the European Union or the United States of America is recommended. If successful this approach of fostering the adoption of laws should also be applied to other policies and laws to be adopted within the framework of this project.

- Considering that the project focused the first half of the implementation on developing and amending key laws and regulations, the focus on the second half needs to be on ensuring that key stakeholders possess the necessary capacities and mechanisms to effectively implement the improved policy and regulatory framework. Particularly, substantial amendments of laws will require continued trainings of key stakeholders, in particular, training of the prosecution to increase their understanding of the new laws. These trainings should focus on amendments to the Criminal Code, to the Law on High Officials Assets and Income Declarations, Law on Political Party Financing, and the Law on Disciplinary Liability of Judges and Prosecutors.
- Develop a coherent approach on ensuring the effective implementation of the Law on Financing of Political Entities/Law on General Elections and increase the capacities of newly established monitoring body in the CEC.
- Institutionalize the approach to corruption proofing based on stakeholder interests, capacities and potential to effectively apply the corruption proofing guidelines in the long-run. Clear institutional accountability lines should be established in order to avoid “blame-shifting” in case the guidelines are not implemented coherently. It is recommended to further develop the approach on corruption based on good practices in the region.
- Ensure that key stakeholders such as the Kosovo Anti-corruption Agency are supported in increasing their capacity to implement its expanded mandated in line with the Law on Anti-corruption Agency and the Law on High Officials Assets and Income Declarations. This will require training of staff and eventually establishing a ToT approach to increase the sustainability of the KACA.
- Ensure that institutions using e-tools to detect and process corruption cases will have the needed capacities to use these tools on a regular basis. E-tools need to be developed as user-friendly platforms, which will lead to efficiency gains.
- To support the Supreme Court in amending the sentencing guidelines in line with the revised Criminal Code and to build capacities enabling the Supreme Court to amend the sentencing guidelines regularly.
- Improve cooperation with EU and US in order to increase the political leverage and clout needed to move ahead with the implementation of the project.
- Further develop an approach to foster political will and decrease resistance to change.
- Support Kallxo.com in improving their security architecture to be better protected against threats in the course of anti-corruption investigations. The project could offer a training on security measures for investigative journalists working on corruption.

Improving efficiency

- The UNDP Programme Associate responsible for SAEK should ensure that all relevant data is captured and inserted in Atlas on regular basis and as comprehensively as possible, covering all RRF indicators.
- Based on the evaluation the proposed set up of the SAEK project team would be:

- Project Manager – oversight, monitoring and management
- CTA – overall technical advise
- Dedicated Project Officers: one for implementation of outcome 1 with legal background and another Project Officer with governance/CSO background for implementation of outcome 2 and 3
- JPO – responsible for knowledge management, communication and visibility
- Alternative approaches to support institutions with integrity plans should be considered such as regular mentoring through the project team.
- The project should maintain and potentially increase its efforts to monitor and to push for the adoption of developed anti-corruption legislation and policies. Coordinating and building coalitions with other key stakeholders including international actors with political clout such as the European Union or the United States should be considered. This can be further explored through partnerships meetings where key stakeholders participate that SAEK organizes regularly for the last 2 and a half years.

Increasing potential for impact:

- Decreasing corruption is a very complex endeavour, in particular, in Kosovo. In order to increase the potential for impact it is recommended to consider latest research findings on anti-corruption
- tools and approaches. Accordingly, the project should continue and potentially expand approaches to increase judiciary independence, develop e-tools, to increase budget transparency and to improve social accountability through kallxo.com and GAP. These approaches demonstrated high potential for impact.¹³
- Develop a comprehensive monitoring and reporting system on RRF indicators at the project level.
- Enhance the kallxo.com platform by introducing additional features that enable reporters of corruption besides location to also indicate the age group, gender and ethnicity. The features could be optional, although there is no strong reason for it as they don't reveal identity.

Increasing sustainability

- Given that the project experience a major shift in its approach, , the upcoming implementation period should be focused on sustainability. The project team is encouraged to develop an exit strategy in participatory manner with key stakeholders involved in the project as well as close coordination with the donors to the project. This is also necessary in case a follow-up project is envisaged. The following recommendations

¹³ For example, the ANTICORRP project (2013-17) has been one of the largest social science research projects of the European Union. ANTICORRP has systematically assessed the impact of public anticorruption tools and their enabling contexts. The findings are public and can be found at: Alina Mungiu-Pippidi, 2018: Seven Steps to Control of Corruption: The Road Map, available at: https://www.mitpressjournals.org/doi/abs/10.1162/daed_a_00500; European Journal on Criminal Policy and Research, Volume 22, Issue 3, September 2016, <https://link.springer.com/article/10.1007/s10610-016-9322-1> and the special issue November 2018 of Crime, Law and Social Change on evidence-based anti-corruption, <https://link.springer.com/journal/10611>

should be considered in the upcoming period and could also be included in the exit-strategy.

- Develop a comprehensive approach on how to ensure sustainability of the developed policy and legislative framework. Ensure that key stakeholders such as the Kosovo Anti-corruption Agency are supported in increasing their capacity to implement its expanded mandate in line with the Law on Anti-corruption Agency and the Law on High Officials Assets and Income Declarations. This will require training of staff and eventually establishing a ToT approach to increase the sustainability of the KACA.
- Considering the comprehensive changes resulting from the newly developed policy and legislative framework, any follow-up project should focus on increasing its sustainability and building on achievements to date.
- Develop a coherent approach on ensuring the effective monitoring of implementation of the Law on Financing of Political Entities/Law on General Elections and increase the capacities of newly established monitoring body.
- Develop a step-by-step approach ensuring a smooth transition from UNDP-driven to nationally driven approach to integrity plans. This approach should focus on increasing the sustainability of existing integrity plans, in particular, linking them with the budgets of the relevant institutions and communicating the new approach to institutions.
- Consider establishing a monitoring mechanism on the implementation of recommendations of the corruption risk assessments carried within the framework of this project. It is assumed that this would result in an increased implementation rate and improved sustainability of the results.
- Institutionalize the approach to corruption proofing based on stakeholder interests, capacities and potential to effectively apply the corruption proofing guidelines in the long-run. Clear institutional accountability lines should be established in order to avoid “blame-shifting” in case the guidelines are not implemented coherently. It is recommended to further develop the approach on corruption based on good practices in the region.
- In order to ensure the sustainability of the sentencing guidelines and strengthen accountability on their use, it is recommended to establish an electronic platform providing an overview of the sentencing on corruption cases.
- Support the Supreme Court in amending the sentencing guidelines in line with the revised Criminal Code and build capacities enabling the Supreme Court to amend the sentencing guidelines regularly.
- Ensure that institutions using e-tools to detect and process corruption cases will have the needed capacities to use these tools on a regular basis. E-tools need to be developed as user-friendly platforms, which will lead to efficiency gains.
- Review the use of the PEPs typology in order to strengthen the sustainability of the tool.
- In order to address obstacles to sustainability of the Office of the Disciplinary Prosecutor, it is advisable to recommend relevant institutions a transfer of civil servants who have been involved in the capacity building measures.
- In order to strengthen the sustainability of communication and PR functions of the Office of the Chief Prosecutor, it is recommended to increase communication capacities of this office avoiding any capacity gaps once the embedded advisor will leave in 2020. To this

end, it is recommended to review the communication system and see how capacity gaps and coordination could be increased.

- It is recommended to engage an Expert on Business Model development in order to assess opportunities for Kallxo.com to develop a business model, which does not solely depend on donor funds. In case technical and regulatory obstacles could be overcome crowdfunding through a specific application would be an option to consider.
- In order to ensure the sustainability of the anti-corruption award it is recommended to hand-it over to domestic institutions – either any of the well-known anti-corruption NGOs and/or KACA.
- It is recommended to expand the approach to gender mainstreaming and minority inclusion to move beyond equal participation to empowerment tackling, in particular, areas in which vulnerable and marginalized groups are potentially exposed to corruption. Measures can include support Kallxo.com to add additional features to its platform besides geographical location, whereby users/reporters are also asked to declare their gender, age group and ethnicity. These features can also be optional, but are important in order to assess the impact of corruption awareness and nature of their concerns amongst vulnerable groups i.e. women, youth and minorities.

ANNEXES

ANNEX 1: RESULTS AND RESOURCE FRAMEWORK

SAEK II: Results and Resource Framework (2018 – 2020)

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| Project title and ID (ATLAS Award ID): Support to Anti-Corruption Efforts in Kosovo (SAEK) II |
| Project Objective: Institutions able to deter, detect and sanction corruption involving institutions and public officials. |
| Impact: Level of corruption in targeted Kosovo public institutions has decreased. |
| Impact Indicator 1: Citizens' perception on corruption prevalence in Kosovo at central level and local level institutions. |
| Impact Baseline 1: UNDP Kosovo Public Pulse prevalence of corruption in health 52.6%, energy 44.7%, education 29.3%, central institutions 38.5%, and local institutions 33.8%. |
| Impact Baseline 2: Corruption Perception Index (CPI) rank for Kosovo is 95 th out of 180 in 2016. |
| Impact Baseline 3: Corruption Perception Index (CPI) for Kosovo is 36 in 2016. |
| Impact Target 1: At least 5% decrease of citizen's perception on prevalence of corruption in targeted institutions (health, energy, and education selected central and local institutions) by 2020. |
| Impact Target 2: CPI rank for Kosovo is 75 th in 2020 (20 places rise). |
| Impact Target 3: CPI for Kosovo is 46 in 2020 (10 point rise). |
| Note: The Corruption Perceptions Index (CPI) ranks countries and territories based on how corrupt their public sector is perceived to be. A country or territory's score indicates the perceived level of public sector corruption on a scale of 0 (highly corrupt) to 100 (very clean). |

Links:

SDG Goal 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

SDG 16 Target: Substantially reduce corruption and bribery in all their forms

SDG 16 Target: Develop effective, accountable and inclusive institutions at all levels

Kosovo UNCDP (2016-2020) Outcome 2.1: Institutions responsible for delivering public services and social justice are accountable and responsive to rights holders

Kosovo UNCDP (2016-2020) Outcome 2.2: Key civil society actors increasingly influence the accountability of governance for public services and social justice

Outcome 1: Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced

Outcome Indicators:

- 1.1 Number of anti-corruption policies and laws developed in line with the UNCAC and relevant international standards and adopted by the responsible anti-corruption institutions, by 2020;
- 1.2 Number of measures completed of the Action Plan of the Anti-Corruption Strategies 2013-2017 and 2018 – 2022, by 2020;
- 1.3 Number of public institutions that have completed integrity plans and undergone a monitoring review by the KACA (at least 25 public institutions until 2020);

Baseline:

- 1.1 5 laws partially in line with UNCAC and international standards¹⁴
- 1.2 50% implemented of 2013-2017 Strategy (2016); 0% implemented of 2018-2022 Strategy
- 1.3 5 integrity plans adopted and 0 monitored (2016)

Target:

- 1.1 5 laws fully in line with UNCAC and international standards by 2020 (status: CoI entered into force; Law on Judges Liability awaiting president's signature; Political Party Financing with the AoK; Law on KACA and Law on Assets at the MoJ working group drafting level)
- 1.2 70% in 2017 of the first strategy, 25% in 2020 of the second strategy (status: 70% completed in the first strategy; strategy 2 not yet adopted but measures underway)
- 1.3 25 integrity plans adopted and 10 monitored by 2020 (status: 21 adopted, 0 monitored till 2018)

Sources of verification:

- 1.1 Official gazette and internal reports;
- 1.2 Report of the Kosovo Anti-Corruption Agency;
- 1.3 Report of the Kosovo Anti-Corruption Agency

¹⁴ Law on KACA, Law on High Officials Assets and Income Declarations, Law on Political Party Financing, Law on Disciplinary liability of judges and prosecutors

| INTENDED OUTPUTS | INDICATIVE INTERVENTIONS | RESPONSIBLE PARTIES | INPUTS |
|--|---|--|--|
| <p>Output 1.1: Anti-corruption legislation and policies developed and capacities for implementation fostered</p> <p>Indicators:</p> <p>1.1.1 2018-2022 Anti-corruption Strategy and Action Plan adopted by the Assembly of Kosovo</p> <p>1.1.2 Amendments to the Law on the Anti-corruption Agency adopted by the central level authorities</p> <p>1.1.3 Amendments to the Law on High Officials Assets and Income Declarations submitted to the central level authorities</p> <p>1.1.4 Amendments to the Law on Financing of Political Entities/Law on General Elections submitted to the central level authorities</p> <p>1.1.5 UNCAC GAP Assessment completed and submitted to central level authorities</p> <p>1.1.6 Integrity plans developed and adopted by public sector institutions</p> <p>Baselines:</p> <p>1.1.1 2012-2017 Anti-corruption Strategy and Action Plan</p> <p>1.1.2 No amendments drafted</p> | <p>Activity results</p> <p>1.1.1 Anti-corruption Strategy and Action Plan 2018-2022 drafted (completed 2017). <i>N.B. Approved by the central level authorities in March 2018, but due to a technical error in the request sent to the AoK not yet approved by them. We are working on rectifying the PM Office's mistake.</i></p> <p>1.1.2 Amendments to the Law on the Anti-corruption Agency drafted (on-going since May 2017, to be completed by April 2018)</p> <p>1.1.3 Amendments to the Law on High Officials Assets and Income Declarations drafted (on-going since May 2017, to be completed by April 2018)</p> <p>1.1.4 Amendments to the Law on Financing of Political Entities/Law on General Elections drafted (since March 2017, completed October 2018)</p> <p>1.1.5 UNCAC GAP Assessment completed (on-going since September 2016, to be completed by December 2019). <i>N.B. originally planned for 2017-2018 but put on hold due to the authorities' time commitments on conducting a GRECO assessment and a functional review of the justice sector and will now be led by SAEK with approximately 20 officials from all relevant anti-corruption bodies and UNODC. The aim is to have Kosovo authorities through this self-assessment tool identify legal and implementation gaps in the</i></p> | <p>Kosovo Anti-Corruption Agency</p> <p>Prime Minister's Office for Legal Support Services</p> <p>Ministry of Justice</p> <p>UNODC</p> <p>Local and central level institutions</p> <p>Assembly of Kosovo</p> | <p>Embedded adviser (KACA from 2017-2020)</p> <p>Embedded adviser (municipal level from 2017-2020)</p> <p>Embedded adviser (AoK Legislative Committee, planned from 2018-2019)</p> |

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| <p>1.1.3 No amendments drafted</p> <p>1.1.4 No amendments drafted</p> <p>1.1.5 No UNCAC GAP assessment conducted</p> <p>1.1.6 5 municipalities adopted integrity plans</p> <p>Targets:</p> <p>1.1.1 Anti-corruption Strategy adopted, implemented and monitored</p> <p>1.1.2 Amendments adopted and implemented</p> <p>1.1.3 Amendments adopted and implemented</p> <p>1.1.4 Amendments adopted and implemented</p> <p>1.1.5 UNCAC GAP assessment completed</p> <p>1.1.6 At least 10 integrity plans completed and adopted</p> | <p><i>anti-corruption framework that are not in line with the UNCAC.</i></p> <p>1.1.6 Integrity plans for central level and local level public institutions completed (21 completed till 2018, focal points to be trained in 2019/2020). <i>N.B. work was stopped in 2018 due to an assessment that integrity plans should first be legislated and then a proper monitoring mechanism put in place. The legislative amendments are being drafted and the monitoring system will be established in 2019.ⁱ</i></p> | | |
| <p>Output 1.2: Anti-corruption monitoring framework established and functional</p> <p>Indicators:</p> | <p>Activity Results</p> <p>1.2.1 Monitoring mechanism for the Anti-corruption Strategy and Action Plan established (scheduled for 2019/2020). <i>N.B. monitoring of the implementation of anti-corruption</i></p> | <p>Kosovo Anti-Corruption Agency</p> <p>Local and central level institutions</p> | <p>Embedded adviser (KACA from 2017-2020)</p> |

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| 1.2.1 | Number of monitoring meetings held among responsible institutions for implementing the AC strategy | policy was done through the PM's High Level Dialogue monthly meetings in 2018. This process has been completed and the embedded adviser in the PM's office has completed his tasks. | Supreme Court | Embedded adviser (municipal level from 2017-2020) |
| 1.2.2 | Number of public sector institutions that have uploaded integrity plans onto the KACA based E-tool | | | |
| 1.2.3 | Number of pieces of legislation reviewed by 2020. | | | |
| 1.2.4 | Sentencing guidelines adopted by the Supreme Court and review of sentencing practice according to new guidelines completed | | | |
| Baseline: | | 1.2.2 | E-tool for uploading, submitting and monitoring integrity plans developed and functioning (scheduled for 2019/2020) | Embedded adviser (PM's office 2018) |
| 1.2.1 | No monitoring meetings held | 1.2.3 | Corruption proofing of legislation system functioning within the KACA (on-going till 2020, methodology developed in 2018, 3 trainings for officials completed in 2018, draft legislation to introduce corruption proofing developed in 2018) | MoU with Supreme Court for conducting review of sentencing guidelines signed in 2018 and will continue through 2020 |
| 1.2.2 | No e-tool for integrity plans | 1.2.4 | Sentencing guidelines developed and monitored in terms of corruption cases (sentencing guidelines adopted in 2018, working group meeting regularly from 2018 through 2020, monitoring of sentencing practice underway and to continue through 2020 based on which a review of the sentencing guidelines will be carried out) | Group for Legal and Political Studies (GLPS), and American Chamber of Commerce (AMCHAM) grants from 2017-2018 |
| 1.2.3 | No legislation has been corruption proofed | | | |
| 1.2.4 | No sentencing guidelines in existence | | | |
| Target: | | | | |
| 1.2.1 | At least 3 AC strategy and Action Plan monitoring meetings held by 2020 | | | |
| 1.2.2 | E-integrity plan tool established and used by at least 5 public sector institutions | | | |
| 1.2.3 | At least 3 pieces of legislation proofed by 2020. | | | |

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| 1.2.4 | At least 10 corruption sentences reviewed against the new sentencing guidelines | | | |
| <p>Outcome 2: Anti-corruption institutions detect and process corruption cases effectively</p> <p>Outcome indicators:</p> <p>2.1 Percentage of asset declarations made electronically and number of red flags generated</p> <p>2.2 Number of individuals investigated through e-platforms</p> <p>2.3 Number of sectors that have undergone a corruption risk assessment and level of monitoring and implementation reports</p> <p>2.4 Number of analytical reports and communications on corruption published by institutions</p> <p>Baseline:</p> <p>2.1 0% e-declarations in 2016</p> <p>2.2 0 individuals investigated through e-platforms</p> <p>2.3 3 corruption risk assessments completed in 2016 (Health, Education, Judicial Integrity). No monitoring and implementation completed.</p> <p>2.4 KACA and OCP publish on an annual basis and conduct irregular communications activities</p> <p>Target:</p> <p>2.1 100% e-declarations by 2020 (status: legal amendments drafted to introduce e-declarations; for case management system and e-declaration system the IT database developed, data migration underway, training of KACA staff underway, and troubleshooting underway in December 2018)</p> <p>2.2 20 cases investigated through e-platforms (status: in 2018 the MoU legal framework for the prosecution database has been completed and the IT specifications are under development; the PEPs database within the FIU is fully functional in December 2018 and 2 PEPs individuals investigated by FIU)</p> <p>2.3 5 new corruption risk assessments by 2020 (status: 2016 extractive industries, 2018 GLPS Kosovo Accreditation Agency, Chamber of Advocates; 2018 National Risk Assessment for Money Laundering; 2019 planned Notaries, 2020 planned Bailiffs). 2 monitoring and implementation reports published by 2020.</p> <p>2.4 KACA and Office of the Chief Prosecutor continue to publish annually, and conduct regular communications activities in line with relevant strategies</p> <p>Sources of verification:</p> <p>2.1 KACA annual report</p> <p>2.2 Prosecution reports, FIU reports</p> <p>2.3 Published reports</p> | | | | |

| 2.4 KACA and OCP reports and communication plans | | | |
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| INTENDED OUTPUTS | INDICATIVE INTERVENTIONS | RESPONSIBLE PARTIES | INPUTS |
| <p>Output 2.1: E-mechanisms for corruption detection and processing established</p> <p>Indicators:</p> <p>2.1.1 E-declaration system developed</p> <p>2.1.2 PEPs searchable database access provided to FIU and used by analysts</p> <p>2.1.3 KACA case management system developed</p> <p>2.1.4 E-tool for accessing criminal and financial records developed</p> <p>Baseline:</p> <p>2.1.1 Paper based assets and income declaration system</p> <p>2.1.2 No PEPs database for searching assets in the FIU</p> <p>2.1.3 Paper based files of cases within the KACA</p> <p>2.1.4 Paper based requests to access criminal and financial records sent by the prosecution to other investigative authorities</p> | <p>ACTIVITY RESULTS</p> <p>2.1.1 E-declarations established for public officials assets and income (on-going since May 2018, to be completed 2019)</p> <p>2.1.2 E-tool for monitoring PEPs functioning by providing access to a global database used by FIUs and law enforcement agencies of assets held by PEPs and related persons (started November, completed December 2018)</p> <p>2.1.3 E-tool for case management system of preliminary investigations within KACA established (on-going since May 2018, to be completed 2019)</p> <p>2.1.4 E-tool for direct access for the Office of the Chief Prosecutor to financial and criminal records within the Police, Tax Administration, Customs Administration, Cadastre established (legal framework drafting started in January 2018 and completed in December</p> | <p>KACA</p> <p>FIU</p> <p>Office of the Chief Prosecutor</p> | |

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| <p>Targets:</p> <p>2.1.1 50% of high public officials declare assets on the online e-system by 2020</p> <p>2.1.2 FIU regularly uses database to monitor PEPs (at least 10 cases per year)</p> <p>2.1.3 All active cases filed in the case management system by 2020</p> <p>2.1.4 At least 20 individuals investigated using the e-tool for accessing financial and criminal records by 2020</p> | <p>2018, IT system to be completed in 2019)</p> | | |
| <p>Output 2.2: Analytical and specialized investigative capacities in relevant institutions established</p> <p>Indicators:</p> <p>2.2.1 At least 50 financial crime investigators trained and at least 30 investigators licensed in fraud examination.</p> <p>2.2.2 PEPs Typologies published</p> <p>2.2.3 Number of sectoral/institutional corruption risk assessments completed</p> <p>2.2.4 Kosovo's Money Laundering National Risk Assessment submitted to central level authorities</p> | <p>ACTIVITY RESULTS</p> <p>2.2.1 Financial crime/corruption criminal investigators trained and specialized in conducting financial investigations (financial investigation specialized course completed in 2016 (25 investigators); Tax Evasion specialized course completed in 2017 (3 courses, 11 investigators); Accredited Licensed Fraud Examination and Forensic Accounting course completed in 2018, 45 investigators).</p> | <p>FIU</p> <p>Office of the Chief Prosecutor</p> <p>Police</p> <p>Tax Administration</p> <p>Customs Administration</p> <p>Supreme Court</p> | |

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| 2.2.5 | Report on Review of Corruption Cases submitted to the President of the Supreme Court and the Chief Prosecutor | 2.2.2 | Typologies of money laundering of Politically Exposed Persons (PEPs) developed (completed in 2018) | | |
| 2.2.6 | Number of cases on unethical behaviour of judges & prosecutors processed by Office of the Disciplinary Prosecutor (ODP) | 2.2.3 | Sectorial/institutional corruption risk assessments completed (Extractive industries completed in 2016, Chamber of Advocates completed in 2018, Notaries and Private Bailiffs scheduled for 2019 and 2020, Group for Legal and Political Studies (GLPS) risk assessment of the Kosovo Accreditation Agency completed in 2018, AMCHAM Business Ethics survey and recommendations completed in 2018) | | |
| Baselines: | | | | | |
| 2.2.1 | No accredited licensed fraud examiners within investigative bodies | | | | |
| 2.2.2 | No assessment of how PEPs launder illicit proceeds in Kosovo conducted | | | | |
| 2.2.3 | Health, Education, Judicial sector corruption risk assessments completed (2016) | | | | |
| 2.2.4 | 2014 National Risk Assessment | | | | |
| 2.2.5 | No external impartial evaluation of completed corruption cases has been conducted | | | | |
| 2.2.6 | 30% of cases on unethical behaviour of judges & prosecutors processed by Office of the Disciplinary Prosecutor (ODP) (2014) | | | | |
| Targets: | | | | | |
| 2.2.1 | At least 30 licensed fraud examiners within investigative bodies, 50 trained through specialized courses | 2.2.4 | Kosovo Money Laundering National Risk Assessment developed through surveys, input by the Ministry of Finance Working Group on the NRA, chaired by the FIU. The NRA analyzes risks, threats and vulnerabilities within all financial and non-financial institutions for the period 2015-2018. The final document, once adopted by the Ministry of Finance will be submitted to Moneyval, FATF and used to educate private sector reporting entities, and develop an action plan for strengthening Kosovo's anti-money laundering | | |

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| <p>2.2.2 PEPs typologies published and presented to stakeholders</p> <p>2.2.3 At least 3 sectoral/institutional corruption risk assessments completed</p> <p>2.2.4 Money Laundering National Risk Assessment adopted by central level authorities</p> <p>2.2.5 20 corruption cases thoroughly reviewed, deficiencies identified and recommendations provided</p> <p>2.2.6 All ongoing disciplinary cases until 2017 reviewed</p> | <p>regime. (started in June 2018 and completed in December 2018 with an aim for the Minister of Finance to adopt it in 2019)</p> <p>2.2.5 Review of completed corruption cases to identify problems in investigations, prosecution and adjudication and provide recommendations for improving the handling of cases (ongoing since August 2018 and will continue through 2019, 20 cases currently under in depth review)</p> <p>2.2.6 Capacity enhancement of the Office of the Disciplinary Prosecutor to effectively & efficiently investigate allegations of misconduct by judges and prosecutors (supported through 3 legal researchers and 20 interns to help with reviewing cases till 2017, work with the ODP completed in 2018). <i>N.B. All work has ceased due to the adoption of new Law in 2018 that will transfer the mandate to another body.</i></p> | | |
| <p>Output 2.3 Effective institutional communication on corruption cases established</p> <p>Indicators:</p> | <p>ACTIVITY RESULTS</p> <p>2.3.1 Development of communication strategy and public relations events held for the KACA (strategy completed in 2017, 2 PR events</p> | <p>Office of the Chief Prosecutor</p> <p>KACA</p> <p>Kallxo</p> | <p>Embedded adviser within the Office of the Chief Prosecutor (2017-2020)</p> |

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| <p>2.3.1 KACA Communication strategy developed, number of PR events with CSOs and the media by 2020</p> <p>2.3.2 Communication strategy adopted by the Chief Prosecutor</p> <p>2.3.3 Number of spokespersons appointed within the prosecution services</p> <p>Baseline:</p> <p>2.3.1 No communication strategy within KACA, and no PR events with CSOs and the media</p> <p>2.3.2 No communication strategy within the Prosecution</p> <p>2.3.3 No appointed spokespersons within the prosecution offices</p> <p>Targets:</p> <p>2.3.1 KACA Communication strategy developed, at least 6 PR events with CSOs and the media by 2020</p> <p>2.3.2 Communication strategy adopted by the Chief Prosecutor</p> <p>2.3.3 At least 4 spokespersons appointed within the prosecution services</p> | <p>with media and CSOs held in 2018).</p> <p>2.3.2 Development of communication strategy within the Prosecution (communication strategy developed in 2018, implementation ongoing till 2020)</p> <p>2.3.3 Spokespersons (10 in total have been appointed) within each regional prosecution office trained on public speaking (2 workshops held in 2018, implementation ongoing till 2020)</p> | | <p>Embedded adviser within the KACA on communications (2017-2018)</p> |
| <p>Outcome 3: Civic engagement mechanisms to hold institutions accountable strengthened</p> | | | |

Outcome indicators:

- 3.1 Number of cases of corruption identified, processed and made public through kallxo.com
- 3.2 Number of viewers of kallxo.com media products on corruption (TV shows, online articles)
- 3.3. Number of institutions publishing budgets and expenditures in a user friendly format on a regular basis
- 3.4 Number of active GOPAC members and public sessions held

Baseline:

- 3.1 250 corruption cases in 2015
- 3.2 Check with kallxo, reports
- 3.3 0 user friendly budgets and expenditures published (check with GAP)
- 3.4 9 in December 2016, 1 public launch of the chapter

Target:

- 3.1 Maintain or increase number of cases processed per year (status: check with KAllxo)
- 3.2 Number of viewers maintained or increased per year (status: check with KAllxo)
- 3.3 30 municipalities and all anti-corruption institutions publish in user friendly format (status: check with GAP)
- 3.4 10 active GOPAC members, and 3 annual public sessions (status: 9 members in 2016, 4 members in 2018 – number dropped due to elections; 1 public event in 2016 launching the chapter, 2 in 2017 on anti-corruption journalism award and gender based budgeting with women’s caucus, 1 in 2018 on promotion of SDG manual in Albanian and Serbian and Discussion on Anti-corruption Legislation with MPs and CSOs)

Sources of verification:

- 3.1 Kallxo reports
- 3.2 Kallxo reports
- 3.3 GAP reports
- 3.4 Internal monitoring reports

| INTENDED OUTPUTS | INDICATIVE ACTIVITIES | RESPONSIBLE PARTIES | INPUTS |
|--|--|---------------------|---|
| Output 3.1: Civic engagement platforms for corruption reporting, referral and monitoring supported Indicator: | ACTIVITY RESULTS 3.1.1 Kallxo.com platform is strengthened further (on-going till end of the project) | Kallxo | Implementing partner agreement with kallxo through 2020 |

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| <p>3.1.1 % of cases processed by Kallxo.com</p> <p>Baseline: 3.1.1 90% of cases reported on Kallxo.com are processed and 10% verified (2015)</p> <p>Target: 3.1.1 All cases verified by Kallxo.com Research Unit by 2020</p> | | | |
| <p>Output 3.2: Public awareness and communication products developed and publicized</p> <p>Indicator: 3.2.1 Number of viewers of the TV show the Prosecutors and number of viewers increased</p> <p>3.2.2 Number of participants voting for the best anti-corruption journalism award</p> <p>3.2.3 GOPAC Chapter and Legislative Committee organize at least 4 public hearing events on anti-corruption</p> <p>3.2.4 Number of innovative awareness raising measures on anti-corruption reaching out to citizens conducted</p> | <p>ACTIVITY RESULTS</p> <p>3.2.1 TV show “The Prosecutor” about how prosecutors undertake corruption investigations aired (8 episodes aired in 2018, on-going till 2020).</p> <p>3.2.2 International Anti-corruption Day marked with public events to raise awareness (3 annual journalism awards in 2016, 2017, 2018 – ongoing through 2019);</p> <p>3.2.3 AoK through the Legislative Committee and GOPAC Chapter provides platform for civic engagement and discussions on anti-corruption (2 Legislative Committee public hearings on TI CPI rating and annual KACA report supported in 2017, 2018; GOPAC Chapter established in 2016 and one hearing held on anti-</p> | <p>KACA</p> <p>Kallxo</p> | <p>Implementing partner agreement with Kallxo through 2020</p> |

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| <p>3.2.5 Number of citizens actively engaging in anti corruption measures – submitting reports, following TV shows - through kallxo.com</p> <p>Baseline:</p> <p>3.2.1 No TV show promoting and explaining the work of prosecutors to the public</p> <p>3.2.2 No award recognition for investigative journalists who produce stories about corruption.</p> <p>3.2.3 No GOPAC Chapter in existence</p> <p>3.2.4 No innovative awareness raising measures on anti-corruption reaching out to the youth, citizens [I think we can say this, since there certainly was nothing like creating video games, corruption drawing competition for children, corruption data cuisine]</p> <p>3.2.5 Number citizens actively engaging in anti-corruption measures – submitting reports, following TV shows - through kallxo.com constantly increased</p> <p>Target:</p> | <p>corruption legislation and SDG manual in 2018, one women’s caucus public hearing on gender based budgeting held in 2016). <i>N.B. GOPAC was established in December 2016, shortly after new elections were held and all work with the AoK was put on hold until new MPs were elected.</i></p> <p>3.2.4</p> <p>3.2.5 1 children’s drawing competition completed 2018, 3 public discussions completed in 2016, 2017, 2018; Game over Corruption application competition in 2017, anti-corruption museum and Open Data Transparency workshop in 2016).</p> <p>3.2.6 3,360 citizens filed corruption complaints through kallxo.com (baseline data from September 2014); number of Facebook followers 40,000 (baseline data from 2014); number of Facebook followers 90,000 (baseline data from 2016); number of Facebook followers (September 2017 baseline data) 135,574; 166,919 Facebook followers (baseline data September 2018); 13,940 Youtube subscribers</p> | | |
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| <p>3.2.1 10 “The Prosecutor” TV shows produced and aired by 2020 and viewers constantly increased</p> <p>3.2.2 3 anti-corruption journalism awards by 2020, 3 public roundtables organized by 2020</p> <p>3.2.3 GOPAC Chapter established and fully functioning</p> <p>3.2.4 3 innovative anti-corruption awareness raising campaigns conducted</p> <p>3.2.5 number of citizens actively engaging in anti-corruption measures – submitting reports, following TV shows - through kallxo.com increased</p> | <p>(baseline data from September 2018)</p> | | |
| <p>Output 3.3 Public expenditure transparently displayed</p> <p>Indicator:</p> <p>3.3.1 Number of municipal budgets transparently presented to the public, number of annual budgets transparently presented to the public</p> <p>Baseline:</p> <p>3.3.1 No transparent public budgets presented to the public</p> | <p>ACTIVITY RESULTS</p> <p>3.3.1 Citizen participation in budgeting process through transparency, civic education (with GAP Institute, ongoing through 2019)</p> | <p>GAP Institute</p> | <p>Implementing partner agreement with GAP institute through 2019</p> |

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| Target: 3.3.1 At least 10 municipal budgets presented transparently per year, and 1 central level budget presented per year | | | |
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ANNEX 2: EVALUATION MATRIX

| Questions | Indicator | Data collection methods/tools | Methods for data analysis | Data sources |
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| Relevance | | | | |
| Key question 1: To what extent does the project fit into the relevant strategic frameworks? | | | | |
| Q 1: To what extent does the project contribute to the implementation of relevant national policies and strategies? | <p>Evidence that the project is linked to relevant national policies and strategies</p> <p>Evidence that the project is coherent with national policies and strategies</p> <p>Evidence that the project fosters the implementation of relevant national policies and strategies</p> | Desk review Stakeholder interviews | Triangulation | Project documentation; national strategies; interview protocols with stakeholders |
| Q2: Have there been any changes in policies and strategy development that have affected the project? If yes, have necessary revisions and adaptations been designed? | <p>Evidence of changes in policies and strategies affecting the project</p> <p>Evidence of project revision(s) based on changes in relevant strategies and policies</p> | Desk review Stakeholder interviews | Triangulation | Project documentation; national strategies; interview protocols with stakeholders |
| Q3: How does the project contribute to the Sustainable Development Goals? | <p>Evidence of coherence and consistency of the project and SDGs</p> <p>Evidence of link of project with SDGs</p> | Desk review Stakeholder interviews | Triangulation | Project documentation; UNDP strategies; interview protocols with stakeholders |
| Key question 2: To what extent does the project reflect the needs of the target group? | | | | |
| Q 4: Is the project relevant in terms of the needs and potentials/resources of the key stakeholders and beneficiaries? Are the project's activities and any of their continuation still relevant for the main beneficiaries? | <p>Project document and situation analysis reflect needs of key stakeholders and beneficiaries</p> <p>Evidence that the project reflects the needs of the key stakeholders and beneficiaries</p> | Desk review Stakeholder interviews | Triangulation | Project documentation; national strategies; interview protocols with stakeholders |
| Q 5: What were the main circumstantial factors taken into account in the project plans and implementation? | Evidence of identification of the main circumstantial factors in project documentation (project plans and progress reports) | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |

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| | Evidence of relevant adjustments due to identified circumstantial factors | | | |
| Q6: Is sufficient local ownership demonstrated? | Extent of national ownership through involving local stakeholders in project design and revision; alignment of project with the central institutions strategy for anti-corruption; national ownership of the reform agenda promoted by the project; | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q7: What are the areas of relevance for future interventions in the target area? | Evidence of areas of relevance for future interventions | Stakeholder interviews | Triangulation | Project documentation; national strategies; interview protocols with stakeholders |
| Key question 3: To what extent does the design of the project is adequately adapted to the chosen goal | | | | |
| Q8: Does the project have a clear results logic/theory of change as basis for monitoring and evaluation? | Evidence of a clear results logic/theory of change used as basis for monitoring and evaluation | Desk review Stakeholder interviews Workshop | Triangulation | Project documentation; interview protocols with stakeholders |
| Q9: Are the hypotheses plausible? | The extent to which hypotheses are valid, likely, acceptable, and reliable | Desk review Stakeholder interviews Workshop | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 10: Is the strategic reference framework well anchored in the concept? | Strategic reference framework reflected in the concept of project | Desk review Stakeholder interviews Workshop | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 11: Are assumptions and risks sufficiently stated and taken into consideration? | Assumptions and risks reflected in the overall design | Desk review Stakeholder interviews Workshop | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 12: Are expected results (outputs, outcomes) clearly defined, and stated in measureable terms, and are results verifiable? | SMART indicators, corresponding baselines and targets defined Monitoring system in place and used | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Impact, Effectiveness and Efficiency | | | | |
| Effectiveness | | | | |
| Key question 4: To what extent has the project achieved its goal and expected results (RFF) | | | | |
| Q13: Is the project on track to achieve its expected results (outputs, outcomes)? What has been achieved? | Evidence of progress in achieving relevant outcome and output indicators Evidence of achievements in line with project documentation | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |

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| Q 14: What challenges have been faced? What has been done to address the potential challenges/problems? | Evidence of factors hindering the implementation Evidence of addressing identified obstacles to the implementation Evidence of regular use of risk assessment and relevant mitigation strategies | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 15: Have the capacity development measures served the needs and demands of the stakeholders? | Evidence of capacity development measures implemented in line with needs and demands of stakeholders Evidence of improvements regarding identified needs and demands of stakeholders | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 16: In what ways could the project improve its efforts in the second half of project's implementation toward achieving the expected results (outcomes, outputs)? | Evidence for room for improvement required to be addressed in the second half of project's implementation toward achieving the expected results (outcomes, outputs) Evidence of shortcomings to be addressed in the second half of project's implementation toward achieving the expected results (outcomes, outputs) | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Key question 7: To what extent has overall aid coordination been properly ensured? | | | | |
| Q 17: How has the project implemented the commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability? | Evidence of commitment to aid coordination and effective implementation of commitments | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Efficiency | | | | |
| Key question 5: To what extent is the project's use of resources is appropriate with regard to the outputs and outcomes achieved | | | | |
| Q 18: Have the roles and responsibilities been clearly defined and described? | Evidence of clear definition and division of roles and responsibilities | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 19: How well have the various activities transformed the available resources into the intended results in terms of quantity, quality and timeliness? (in comparison to the plan) | Use of resources is appropriate with regard to the quantity, quality and timeliness outputs achieved (in comparison to the plan) Use of resources is appropriate with regard to the quantity, quality and timeliness | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |

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| | outcomes achieved(in comparison to the plan) | | | |
| Q 20: Are the expected results achievable with the planned approach and resources? | Extent to which expected results are achievable with the planned approach Extent to which expected results are achievable with the planned human resources Extent to which expected results are achievable with the planned financial resources | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 21: Are the management and administrative arrangements sufficient to ensure efficient implementation of the project? | Evidence of appropriate management and administrative arrangements Extent of factors enabling/hindering staff members to ensure efficient implementation of the project | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Impact (potential) | | | | |
| Key question 7: Is there evidence of long lasting desired changes and benefits, in which aspects? | | | | |
| Q 22: Has the project appropriately reached its target groups? Is the project serving the needs of vulnerable groups, i.e. women, youth, minorities? | Evidence that the project responded to the needs of vulnerable groups Target groups reached in line with | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 23: To what extent did the project contribute to behavioural changes and motivation of key stakeholders regarding corruption prevention and corruption suppression? | Perceived changes in behaviours and motivation of key stakeholders to prevent and suppress corruption | Desk review Stakeholder interviews Focus group | Triangulation | Project documentation; interview protocols with stakeholders |
| Sustainability | | | | |
| Key question 6: To what extent are benefits of the project likely to continue after the project has ended? | | | | |
| Q 24: How will the project ensure sustainability of its results when the project will have ended (i.e. continuity of developed capacities, use of knowledge, improved practices, etc.)? | Evidence of use of developed capacities, practices, and knowledge. Evidence of implementation of developed policies, strategies and legislation. Evidence of use of developed tools (e.g. data management systems etc). | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 25: What has been achieved in institutionalizing the acquired knowledge and skills? | Evidence of use of knowledge and skills Evidence of multiplier effects (i.e. ToTs, regular relevant capacity building embedded in institutional and policy framework) | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |

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| Q 26: To what extent has the project led to a change of behaviours and motivations in terms of paying attention to marginalised and vulnerable population groups. | Evidence of change of behaviour in terms of paying attention to marginalised and vulnerable population groups. Evidence of change of motivation in terms of paying attention to marginalised and vulnerable population groups | Desk review Stakeholder interviews | Triangulation | Project documentation; interview protocols with stakeholders |
| Q 27: Does the project have a concrete and realistic exit strategy to ensure sustainability? | Evidence of a clear exit strategy for the project in place and track record in its implementation | Desk review Stakeholder interviews | Triangulation | Project documentation stakeholders |
| Q 28: In case of sustainability risks, are sufficient mitigation measures proposed? | Sustainability issues considered in risk analysis and sufficient mitigation taken | | | |

ANNEX 3: ITINERARY FOR EVALUATION FIELD MISSION

| Time | Location | Institution | Person | Address/Contact details | Topics | Resources required | Evaluation team |
|----------------------------|-----------|---------------------------|-----------------------------|--|-----------------------------------|--------------------|-----------------|
| THURSDAY, 6.12.2018 | | | | | | | |
| 09:00-10:00 | Prishtina | Municipality of Prishtina | Muhedin Nushi, Deputy Mayor | HQ, Centre | Cooperation with SAEK and results | n/a | Krenar |
| 13:30-14:30 | Prishtina | Kosovo Police | Brahim Sadriu, HR Officer | HQ, Center 4 th floor, nr.66 045 266 252 | Cooperation with SAEK and results | n/a | Krenar |

| MONDAY 10.12.2018 | | | | | | | |
|-----------------------|-----------|------------------|---|---------------------------------|---|---|--------|
| 08:30-10:00 | Prishtina | UNDP | Alexandra Roccasalvo, DRR Valbona Bogujevci, ARR Mato Meyer, SAEK CTS | | Objectives of the mission, briefing | n/a | Krenar |
| 13:00-14:00 | Prishtina | FIU | Behar Xhema, ?? | HQ, Dragodan Eduard Lir no. 194 | Cooperation with SAEK and results | Transport from UNDP Translation (Albanian) | Both |
| 14:30-15:30 | Prishtina | Supreme Court | Enver Peci, President | HQ, Centre Luan Haradinaj | Cooperation with SAEK and results | Transport from FIU Translation (Albanian) | Both |
| 16:30-17:30 | Prishtina | UNDP | Alexandra Roccasalvo, DRR | | Objectives of the mission, briefing | n/a | Both |
| TUESDAY 11.12.2018 | | | | | | | |
| 10:00-11:30 | Prishtina | SDC | Arjan Shabani, Programme Manger | HQ, Aktash | Cooperation with UNDP and SAEK results | Transport from Hotel | Both |
| 11:30-12:30 | Prishtina | UNDP | Valbona Bogujevci, ARR Marta Gazideda, Governance Portfolio Manager | | Objectives of the mission, briefing | n/a | Both |
| 13:00-14:00 | Prishtina | UNDP | Ulrike Richardson, RR | | Objectives of the mission, UNDP CP /UN CDP strategy, briefing | n/a | Both |
| 15:00-16:30 | Prishtina | Internews/Kallxo | Faik Ispahiu, CEO | HQ, Aktash | Cooperation with SAEK and results | Transport from UNDP | Both |
| WEDNESDAY, 12.12.2018 | | | | | | | |
| 09:00-11:00 | Prishtina | KACA | Shaip Havolli, CEO | HQ, Taslixhe | Cooperation with SAEK and results | Transport from Hotel | Both |

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| | | | | | | Translation (Albanian) | |
| 11:00-15:00 | Prishtina | UNDP | SAEK Team | | ToC and RRF reconstruction | n/a | Both |
| 15:00-16:00 | Prishtina | UNDP | Mato Meyer, SAEK CTS | | Objectives of the mission, briefing | n/a | Both |
| 15:00-16:00 | Prishtina | UNDP | Albert Avdiu, SAEK former PM | | Objectives of the mission, briefing | n/a | Both |
| THURSDAY 13.12.2016 | | | | | | | |
| 09:00- 10:30 | Prishtina | UNDP | Viktor Popovic, SAEK Embedded Advisor | | Cooperation with SAEK and results | n/a | Both |
| 11:00-12:00 | Prishtina | State Prosecutor Office | Aleksander Lumezi, Chief Prosecutor Merita Gashi, SAEK Embedded Advisor | HQ, Centre | Cooperation with SAEK and results | Translation (Albanian) | Both |
| 13:00- 14:30 | Prishtina | UNDP | Rrezarta Reka, SAEK Project Officer | | Objectives of the mission, briefing | | Both |
| 15:00-16:00 | Prishtina | Office of the Prime Minister | Mentor Borovci, Director of Legal Office | HQ, Centre | Cooperation with SAEK and results | Translation (Albanian) | Both |
| 16:30-17:30 | Prishtina | UNDP | Alexandra Roccasalvo, DRR | | Evaluation preliminary results de- briefing meeting | | Both |
| FRIDAY 14.12.2016 | | | | | | | |
| 09:00-11:00 | Prishtina | UNDP | UNDP, SAEK Team, key stakeholders | | Evaluation preliminary results de- briefing meeting | | Both |
| 11:00 | | Departure of Julia | | | | | |

| MONDAY 17.12.2016 | | | | | | | |
|---------------------------|-----------|-----------------------------------|---|---------------------|-----------------------------------|--|--------|
| 11:00-12:00 | Prishtina | Assembly of Kosovo | Albulena Haxhiu, Chair of the Legislative Committee | AoK, Centre | Cooperation with SAEK and results | | Krenar |
| 13:00-14:00 | Prishtina | Assembly of Kosovo | and Armend Zemaj, Chair of GOPAC | AoK, Centre | Cooperation with SAEK and results | | Krenar |
| TUESDAY 18.12.2016 | | | | | | | |
| 10:00-11:30 | Prishtina | Kosovo Democratic Institute (KDI) | Arben Kelmendi, Programme Manager Florent Spahija, Project Officer | Rr. Bajram Kelmendi | General overview on corruption | | Krenar |