

FINAL REPORT

Mid-term Project Evaluation of the Support to Anti-Corruption Efforts in Kosovo, phase III (SAEK III)

Commissioned by:
UNDP Kosovo

Authors:
Krenar Loshi and Mytaher Haskuka
Evaluation Team

15 August 2022

Disclaimer: The analysis and recommendations of this report do not necessarily reflect the views of the United Nations Development Programme, its Executive Board or the United Nations Member States. This is an independent evaluation and reflects the views of its authors.

Note: Kosovo as per UNSCR 1244 (1999), hereinafter referred to as Kosovo.

Project Data

Project information

Project Title	Support to Anti-corruption Efforts in Kosovo - phase III (SAEK III)
Project number	0122188
Time Scope	1 July 2020 – 30 June 2024
Geographic Scope	Kosovo wide
Planned Budget	EUR 4.5 mil.
Executing Agency	UNDP Kosovo
Implementing Partners	Internews Kosova, Kosovo ROLAG, Kosovo GAP Institute, Kosovo Basel Institute on Governance, Switzerland
Key Institutional Partners	Academy of Justice Assembly of Kosovo Financial Intelligence Unit Kosovo Anti-Corruption Agency Ministry of Justice Office of the Chief Prosecutor Specialist Chambers and the Specialist Prosecutors Office Supreme Court
Donors	SDC – Swiss Development and Cooperation SIDA – Swedish International Development Cooperation Agency

Project budget breakdown by donor

Commitments	1 July 2020 – 30 June 2021 (EUR)	1 July 2021 – 30 June 2022 (EUR)	1 July 2022 – 30 June 2023 (EUR)	1 July 2023 – 30 June 2024 (EUR)	Total (EUR)
SDC	550,000	575,000	575,000	550,000	2,250,000
SIDA	550,000	575,000	575,000	550,000	2,250,000
Total	1,100,000	1,150,000	1,150,000	1,100,000	4,500,000

Project delivery to date (July 2020 – June 2022)

Donor	1 July 2020 – 30 June 2021 (EUR)	1 July 2021 – 30 June 2022 (EUR)	1 July 2022 – 30 June 2023 (EUR)	July 2023 – 30 June 2024 (EUR)	Total (USD)
SDC	407,232.64	n/a			
SIDA	398,181.66	n/a			
Total	805,414.30	n/a			

Project framework

Contributing Outcome of CPD	1.1 Rule of law system and institutions are accessible to all and perform in a more efficient and effective manner.
Contributing Outputs of CPD	1.1.6 Kosovo anti-corruption institutions are able to monitor, prevent and fight corruption at central and municipal level 1.2.1 CSOs have increased capacity in seeking accountability and transparency on fight against corruption
Previous evaluations	SAEK II Mid-term evaluation (2018) SAEK II Final evaluation (2020)
Audits	24 September 2021 (SAEK II and SAEK III)

Evaluation information

Evaluation type (project/ outcome/thematic/country programme, etc.)	Project evaluation	
Final/midterm review/ other	Mid-term evaluation	
Period under evaluation	Start	End
	1 July 2020	30 June 2022
Evaluators	Krenar Loshi and Mytaher Haskuka	
Evaluator email address	krenar.loshi@gmail.com mhaskuka@gmail.com	
Evaluation dates	Start	Completion
	23 May 2022	15 Aug 2022

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Abbreviations and Acronyms

AC	Anti-corruption
AoK	Assembly of Kosovo
AoJ	Academy of Justice
CDP	Common Development Plan
CSO	Civil Society Organization
CoE	Council of Europe
EC	European Commission
ECPR	European Commission Progress Report
ET	Evaluation Team
EUSR	European Union Special Representative in Kosovo
FIU	Financial Intelligence Unit
KACA	Kosovo Anti-Corruption Agency
KJC	Kosovo Judicial Council
KP	Kosovo Police
KPC	Kosovo Prosecutorial Council
MoJ	Ministry of Justice
OCP	Office of the Chief Prosecutor
OPM	Office of the Prime Minister
SAEK	Support to Anti-Corruption Efforts in Kosovo
SOP	Standard Operating Procedures
SPO	Specialist Prosecutors Office
SDC	Swiss Agency for Development and Cooperation
SIDA	Swedish International Development Assistance
PEP	Politically Exposed Persons
PPP	Public Private Partnership
TAK	Tax Administration of Kosovo
ToC	Theory of Change
ToR	Terms of Reference
UNDP	United Nations Development Programme
UNKT	United Nations Kosovo Team

Executive Summary

Background: UNDP's flagship anti-corruption programme 'Support to Anti-Corruption Efforts in Kosovo' (SAEK), has been running since September 2012, and currently is in the third phase of implementation (SAEK III), which started in July 2020 and is due to be completed in June 2024. The SAEK III is equally funded by the Swiss Agency for Development and Cooperation (SDC) and Swedish International Development Agency (SIDA), with the overall budget of EUR 4.5 mil. The goal of the SAEK III project is to conclude the framework for preventive and suppressive anti-corruption processes that leads to asset confiscation, by addressing three key challenges i) implementation of policy and legislative frameworks on suppression of corruption; ii) strengthening capacities of anti-corruption institutions; and iii) fostering public demand for accountability through civic engagement.

Evaluation: The mid-term evaluation of "Support to Anti-Corruption Efforts in Kosovo" phase III, was commissioned by the UNDP Kosovo, and was carried out by an independent evaluation team, during the period of 23 May 2022 – 31 July 2022. The overall objective of the assignment was to evaluate the project in terms of its relevance, effectiveness, efficiency, impact and sustainability, to note progress against indicators, identify possible implementation gaps, and propose corrective actions for the remaining period of implementation toward achieving the expected results.

Findings: In terms of **relevance**, the project was structured well in three outcome areas, containing results, indicators, targets, and activities, organized around a clear Theory of Change. The project actions were highly relevant to the context and aligned well with key government and international strategies and priorities. Furthermore, the project managed to successfully adapt changes to the activity delivery and overcome the challenges during the Covid pandemic. With regard to **efficiency**, the project organizational structure set by UNDP, had provided for solid quality assurance of implementation, coupled with well functioning internal and external coordination mechanisms, and strong partnerships and alliances. Notably, UNDP's impartiality and vast experience in the area of anti-corruption and rule of law, coupled with highly efficient and flexible mechanisms in place, able to deliver and adapt fast in a very complex and ever changing environment, were considered crucial aspects in ensuring successful implementation of the project. In terms of **effectiveness**, most of the targets of outcome 2 were achieved, and outcome 3 exceeded, whereas outcome 1 targets remained in progress due to prolongation with the adoption of the draft laws necessary for completion of foreseen activities, which is out of project's control. The key challenge was the adoption of the anti-corruption laws by the Assembly, mainly caused due to lack of quorum. Monitoring of results had improved significantly over the years, especially with regard to processes, but more needs to be done in strengthening demonstration of impact. With regard to **impact**, the individual level transformations were most evident in cases where a long-term certified training or on the job support was provided, such has been the case with special prosecutors, FIU and KACA. The organisational/systemic transformations were best demonstrated through a combined institutional effort such as the case with the freezing and confiscation of illicit funds. Whereas, societal level transformations involve citizens and cultural change, which were best demonstrated through the reporting of crime cases and spiralling effects created in terms of prompting institutions to act, which in turn generated greater public confidence to report such cases. Most importantly, significant efforts were made to mainstream **gender** across all activities, achieving overall women participation at around 40%, which considering the male dominated institutions (only around 30% are women) was a remarkable achievement despite falling short of the set target of 50%. With regard to **sustainability**, project's systematic approach in improving the legislative and policy framework against corruption, coupled with measures for increased effectiveness of anti-corruption institutions and strengthened civic engagement mechanisms to hold institutions accountable, provided a solid basis to build sustainability of the anti-corruption system in Kosovo. The potential for greater sustainability was generated through

strengthening local ownership of results, capacity development measures, multi-stakeholder approach, and public accountability measures.

Learnings: The key learning priorities that need to be maintained in the remaining period concerned:

Local ownership: The project understood early on the importance of building local ownership of processes and results, evidently so by focusing on demand driven initiatives, joint drafting of policy and legal acts, followed by capacity development measures, and eventual handover to relevant institutions; **E-tools:** In terms of e-tools, for the sustainability of their usage, it is very important that they are developed in a participatory manner, that they are functional and demonstrate efficiency gains to the institutions using them. These steps ensure that the usability of such tools will be sustained over time; **Managing change:** The project focus in working more with civil servants where possible, rather than politically appointed officials, ensured that ambitious goals are followed through, despite frequent elections and government changes (3 government changes during 2020-21); **Seeing challenge as an opportunity:** Restrictions posed by Covid-19 pandemic on in-person meetings was challenge and affected implementation, however it also presented an opportunity. Specifically, trainings organized together with FIU could not have such a huge audience if not organized online. In some cases, online virtual platforms provided opportunity to engage more than 200 participants at a time, from different sectors and regions, which otherwise would not be possible in physical space and would cost beyond budgetary limits; **Motivation and capacity for development:** Interviews with trainers highlighted one critical points for successful trainings, the need for participants who have minimal capacities to understand and are motivated for change. The capacities of participants to absorb and gain skills/competencies are critical together with motivation, therefore screening and preparatory work for selection and motivation of participants should be standard procedure.

Recommendations: The evaluation recommends that during the course of the remaining phase, the project undertakes the following measures, concerning:

KACA: SAEK needs to take quick steps in finalizing the online asset declaration platform for KACA, focusing on modules that are not dependent on the adoption of the law on asset declaration, whereas the asset declaration module can also be finalised but not activated until the law is adopted. This will allow KACA to start with the digitalization of some of the internal process, which they're eager to do at soonest (**urgent measure**).

FIU: The newly established Strategic Analysis Department has started to produce notable results in a short time frame, however further bilateral support from a foreign FIU is needed to gain practical knowledge of how to enhance strategic analysis and operationalize findings further. SIDA is well known to have mechanisms to engage Swedish agencies in assisting sister agencies in the region, an option that the project could explore further in discussion with SIDA.

KALLXO: Kallxo platform, although sustainable to an extent due to eco-system of products (news, shows, analysis, etc.) build around it, the scale it operates now is still dependent on donor funding, and the sustainability of results achieved through is platform would be significantly impacted after the project ends. Further support is needed in assessing and identifying a business model that is not dependent on donor funds.

Gender: Follow-up on the report on Gender Corruption Risks and Vulnerabilities survey, in formulating anti-corruption interventions with a gender perspective, addressing women vulnerabilities in particular, especially the ones related to nepotism, favouritism and patronage in the civil service.¹ In this regard, Integrity Plans offer the best opportunity for integrating novel practices in tackling nepotism, favouritism and patronage in the civil service from gender perspective. The project can start

¹ 94% of civil servants surveyed at the central level listed nepotism, favouritism and patronage as the main forms of corruption that exist across the civil service in Kosovo.

in developing such guidance now, to be ready by the time the draft law that mandates KACA with development and monitoring of integrity plans, is adopted.

Sustainability and exit strategy: Given that the project is the third phase, with two more years remaining until end of project, the upcoming implementation period should focus on sustainability. SAEK team should take immediate steps in ensuring gradual exit from activities, moving towards more of an advisory role. No new emerging priorities or activities ought to be undertaken without a clear exit strategy in place. The team is encouraged to develop a clear exit strategy in participatory manner with each of the stakeholders involved and in close coordination with funding partners SDC and SIDA.

Future direction: As SAEK is completing the third phase of implementation, which by the end will mark 12 years in working with key government institutions in strengthening policy framework and institutional capacities to tackle corruption, whereas most of it still remains relevant, most pressing one, today, is the establishment of a system for the Verification of Unexplained Wealth. It is a government priority – and the Venice Commission, recently, in June 2022, issued an Opinion on the draft law which gave Kosovo a green light to go ahead with the law. This is also a logical progression of SAEK's work. Namely, the central digital platform would be the SAEK created Wealth Discrepancy Database. While the staff would comprise of investigators who have already been trained in stolen assets recovery through SAEK. And finally, SAEK has extensive experience in drafting regulations and SOPs, which would be the most labour intensive activities that the government would need. Furthermore, the MoJ has also requested UNDP's support through a project and offered to help fund raise with potential donors. On another note, UNDP ought to build on the momentum and broaden the scope of the anti-corruption portfolio also into energy and environment related corruption, which has now become one of the most pressing problems also for Kosovo, as reported by Kallxo in relation to corrupt processes of issuing building permits in Brezovicë/Brezovica, issuing of irregular environment licences for the building of hydropower stations in Kaqanik/Kacanik, Brezovicë/Brezovica and Deqan/Decane areas, irregularities with licences for mineral exploitation as reported in UNDP's 'Corruption Risk Assessment – Kosovo Extractive Industries Sector', and numerous other cases.. In doing this, undertaking a comprehensive scoping study jointly with the government at the earliest opportunity, is strongly suggested.

I Introduction

UNDP's flagship anti-corruption programme 'Support to Anti-Corruption Efforts in Kosovo' (SAEK), has been running since September 2012, and currently is in the third phase of implementation (SAEK III), which started in July 2020 and is due to be completed in June 2024. The SAEK III is equally funded by the Swiss Agency for Development and Cooperation (SDC) and Swedish International Development Agency (SIDA), with the overall budget of EUR 4.5 mil.

The mid-term evaluation of "Support to Anti-Corruption Efforts in Kosovo" project phase III, was commissioned by the UNDP Kosovo to review the mid-term progress in relation to its relevance, efficiency, effectiveness, impact, and sustainability.

The evaluation was carried out during the period of 23 May 2022 – 30 June 2022, by an independent evaluation team consisting of one international and one local expert.

II Description of the intervention

The SAEK project since it started in 2012 has transitioned from focus corruption prevention (during SAEK I 2012 – 2015 period) on to corruption prevention and suppression (during SAEK II 2016 – 2020 period), which continued during the current SAEK III implementation phase (2020 – 2024), with added emphasis on confiscation and recovery of stolen assets. As such, the goal of the SAEK III project is to conclude the framework for preventive and suppressive anti-corruption processes that leads to asset confiscation, by addressing three key challenges:

- ⇒ implementation of policy and legislative frameworks on suppression of corruption (*outcome 1*);
- ⇒ strengthening capacities of anti-corruption institutions (*outcome 2*); and
- ⇒ fostering public demand for accountability through civic engagement (*outcome 3*).

The goal will be achieved through implementation of the following outcomes and outputs:

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

The first outcome focuses on the implementation of policies, legislation, plans and strategies, in order to increase institutional compliance with principles of integrity, transparency and improve capacities to suppress corruption.

Output 1.1: Policy and legal anti-corruption framework implemented in gender sensitive manner

Output 1.2: Anti-corruption Strategy 2020 – 2024 effectively implemented in gender sensitive manner

Output 1.3: Anti-corruption Strategy and Action Plan 2024 – 2028 developed in gender sensitive manner

Outcome 2: Anti-corruption institutions detect, repatriate hidden stolen assets and process corruption cases effectively.

The second outcome focuses on strengthening anti-corruption institutions by providing them with the capacity and tools to effectively detect and suppress corruption, to be able to seize illicit assets and to ensure their repatriation to the public budget.

Output 2.1: Anti-corruption institutions have improved tools and capacities to issue charges

Output 2.2: Successful adjudication of corruption cases

Output 2.3: Citizens are more aware of their rights and responsibilities on public transparency and accountability increased, with a focus on vulnerable women and marginalised groups

Outcome 3: Strengthened civic engagement mechanisms to hold public institutions accountable.

The third outcome focuses on the development of civic engagement mechanisms through initiatives on corruption reporting, referral and monitoring, to be able to influence public institutions to be more transparent and accountable to citizens on deterring, sanctioning corruption.

Output 3.1: Public institutions are more responsive and effective in resolving cases of corruption brought forth by the public through CSO.

III Evaluation Methodology

Objective and scope of the evaluation

Objective: The overall objective of the evaluation assignment was to conduct a mid-term evaluation Support to Anti-Corruption Efforts in Kosovo (SAEK) Project phase III, in terms of its relevance, effectiveness, efficiency, impact and sustainability, to note progress against indicators, identify possible implementation gaps, and propose corrective actions for the remaining period of implementation toward achieving the expected results.

Institutional scope: The evaluation focused on the progress made working with the key project stakeholders and beneficiaries in Kosovo:

- Institutions (Kosovo Anti-Corruption Agency, Office of Chief Prosecutor, Specialist Chambers and Specialist Prosecutor Office, Supreme Court, Assembly of Kosovo, Ministry of Justice, Financial Intelligence Unit, Academy of Justice)
- Civil society organizations (Internews Kosova, GAP Institute, ROLAG, Basel Institute on Governance)
- International organizations (SDC, SIDA, EUSR, US Embassy, CoE)

Time scope: The time period covered by the evaluation is July 2020 to June 2022.

Evaluation criteria

The evaluation was conducted in line with the evaluation objective and the ToR requirements (Annex 5). The evaluation employed an inclusive, participatory approach with due consideration to gender and communities composition in Kosovo, and followed the UNDP methodology as described in the Handbook for Planning, Monitoring and Evaluation and the OECD/DAC evaluation criteria, examining the relevance, effectiveness, efficiency, impact and sustainability of the interventions adopted and implemented by the project.

The evaluation was based on the Theory of Change logic of the SAEK III (Chart 1), which allowed for contrasting of the observed results against the original plans with an aim to collect evidence of what had changed and then, working backwards, determine whether and how interventions had contributed to change.

The evaluation was conducted in the following main phases:

Preparatory phase

Clarification of the mandate: Preliminary discussion with the SAEK Team was held on 24 May 2022, to clarify the understanding of the evaluation assignment ToR, the persons to interview, documents to review, the expectations, and the structure of the report.

Desk research: The key documents provided by the SAEK Team and gathered through research were studied to better understand the context dynamics, the legal framework, the experiences of UNDP in supporting anti-corruption efforts in Kosovo and the engagement of different development partners in this field.

Methodology proposal: The findings of the desk study defined the Methodology Proposal for the evaluation, containing the evaluation methodology, scope and evaluation matrix/questionnaire to be used during the interviews, which was discussed with the SAEK Team prior to conducting the field research, and submitted to UNDP for approval.

Data collection

The evaluation relied on a mixed-methods approach in order to ensure reliability and validity of evaluation results, in line with the ToR (Annex 5). Data was collected through desk review of project documentation, project monitoring data, relevant research papers (Annex 1) and semi-structured interviews with stakeholders, partners and beneficiaries (Annex 2), in line with the Evaluation Matrix (Annex 3). A mix 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. Primary data sources were consulted through conducting semi-structured interviews, meetings, discussions with selected stakeholders and beneficiaries in the government institutions and civil society. Secondary data sources were consulted through project documentation, relevant national documents/strategies and research papers.

The following main activities took place during this phase:

Briefing with the SAEK Team: The briefing with the SAEK Team was held on 30 May 2022, and will serve to get further updates and information from the SAEK Team on their reflections and engagement in the field of anti-corruption efforts, stakeholders and their interests, and progress to date.

Interviews with main stakeholders: Interviews with representatives of the main stakeholders were conducted during 3 – 10 June 2022. The following categories of actors were covered in the interviews, involving representatives from different institutions:

- SAEK team and UNDP management
- Government institutions (Kosovo Anti-Corruption Agency, Office of Chief Prosecutor, Supreme Court, Assembly of Kosovo, Academy of Justice, Ministry of Justice, Financial Investigation Unit, Specialist Chambers and Specialist Prosecutor Office)
- Civil society organizations (Internews Kosova, GAP Institute, ROLAG, Basel Institute on Governance)
- International organizations (SDC, SIDA, EUSR, US Embassy, CoE/PECK)

Discussion on preliminary key findings: Towards the end of the field mission, on 9 June, the interim findings were presented and discussed with UNDP management, in order to gather further feedback for the report writing.

Data analysis and report writing

Draft report: Based on the findings acquired during the field visits and review of the relevant project documentation, a draft report containing the methodology applied, a presentation of findings, a presentation of the lessons learned and clear strategic and operational recommendations, was

formulated and submitted to UNDP on 30 June for review and comments. All data will be collated, triangulated and verified before any conclusions are drawn.

Final report: Based on the feedback received from the UNDP and stakeholders, the report will be revised, completed and submitted to UNDP on 25 July 2022 for final approval.

Challenges and limitations

The evaluation process was not expected to encounter any major challenges and limitations. The potential risks were indicated in the table below, with an indicative assessment of the occurrence probability and mitigation measures, and subsequent result.

Table 1 – Map of risks and mitigation measures

Risks	Mitigation Strategy	Result
Difficulties in data collection <i>Probability: low</i>	The evaluation team will mitigate the potential risk of missing data through SAEK Team and interviews with stakeholders and beneficiaries.	Most data for 2020-21 was obtained from the progress reports. Some target data for 2021 are still missing. ET asked SAEK Team for data of Jan-Jun 2022 period, but were not readily available as the mid-term report for 2022 is due by the end of July.
Delays in the evaluation schedule due to delays in receiving comments <i>Probability: medium</i>	UNDP shall coordinate and ensure timely submission of comments from all relevant stakeholders.	Due to delays in receiving the comments, the evaluation period was extended from 31 July to 15 Aug 2022.
Unwillingness, unavailability or irresponsiveness of the beneficiaries to disclose the relevant information <i>Probability: low</i>	The evaluation team will seek the missing information and evidences from different documents and through interviews with the other actors, if needed.	No such difficulty encountered.
Limited participation in the interviews and/or participation of persons without adequate institutional knowledge of the programmes <i>Probability: medium</i>	The evaluation team will use Skype, Zoom and phone to reach the adequate persons that left their positions or are not able to participate in a face-to-face interview, if needed.	No such difficulty encountered.
Volume (digital / paper) is very high <i>Probability: low</i>	This risk will be mitigated by division of tasks among the evaluation team.	No such difficulty encountered.

Work schedule and deliverables

Start of the assignment: 23 May 2022

Methodology Proposal: Draft and submit the Methodology Proposal, containing the methodology to be applied during the mid-term evaluation, work plan and technical instruments to be used during the course of the assignment (*completed by 30 May 2022*)

Field Mission: Conduct field visits, meetings and interviews in Kosovo, gathering data to be used in the mid-term evaluation report (*completed during 3 – 10 June 2022*)

Draft Report: Draft and submit the Mid-term Evaluation report, containing the methodology applied, a presentation of findings, a presentation of the lessons learned and clear strategic recommendations to the UNDP and its partners suggesting possible adjustments for the remaining period of project's implementation, formulated based on the findings acquired during the field mission to Kosovo and through the relevant project documentation (*completed by 30 June 2022*)

Final Report: Review and submit the Final Evaluation report, accounting for the UNDP and stakeholders' feedback on the first draft (*completed by 15 August 2022*)

IV Findings

4.1 Relevance

The relevance chapter analyses i) whether and how well the project results, targets and indicators were defined clearly and if/how they link to outcomes (**design**); ii) whether and how well the interventions addressed the needs and priorities of targeted beneficiaries (**adequacy**); iii) whether and how well the project was linked to the stakeholder strategies and priorities (**alignment**), and iv) whether and how responsive was the project to challenges and opportunities faced during implementation (**adaptability**).

The project was structured well in three outcome areas, containing results, indicators, targets, and activities, organized around a clear Theory of Change. The project actions were highly relevant to the context and aligned well with key government and international strategies and priorities. Furthermore, the project managed to successfully adapt changes to the activity delivery and overcome the challenges during the Covid pandemic.

Design: The project was structured well in three outcome areas, containing results, indicators, targets, and activities. All of these components were clear and adequately linked up.

The project had a coherent Logical and M&E Framework, equipped with SMART² indicators and targets, and a clear Theory of Change (chart 1), explaining the sequence and nature of the change being pursued i.e. the problem being addressed; the problem causes, the interventions to tackle the problem causes, and the link to strategic goals.

The participatory character of the design process, especially at activity level was highlighted by the institutional stakeholders, which resulted in an increased trust and ownership of results. A very positive point in the design was a good attempt to mainstream gender in the Logical and M&E Framework.

The Theory of Change (chart 1) illustrates how the project strategy is anchored on the premise that corruption in Kosovo will be reduced through i) increased political commitment by developing concrete strategies, policies and measures that prevent and sanction corruption practices; ii) capacitating institutions with the tools, systems and knowledge to fight corruption; and iii) strengthening civil society mechanisms to seek greater institutional accountability.

² Specific, measurable, achievable, relevant, and time bound.

Chart 1 – SAEK III Theory of Change



Adequacy: The project was highly relevant to the situational context and addressed in nature the challenges and demands of the targeted beneficiaries, both at institutional and civil society level. Corruption is still perceived to be among the top problems in the society. Tackling corruption through set up of a functioning assets recovery system to identify and repatriate stolen assets, and to more efficiently process and adjudicate corruption cases is seen as a high priority. There continues to be a high demand to strengthen institutional capacities to deter, detect, sanction and adjudicate corruption cases, which is fully in line with the objectives of the project.

The selection of the targeted institutions was also particularly adequate. The project has managed to involve in its activities all relevant anti-corruption institutions, and within that the key institutional experts/heads of departments, while actively pursuing to reach equal gender participation.

Alignment: The project was well aligned to and contributed to the following main strategies and priorities:

- ⇒ **Kosovo:** Anti-Corruption Strategy 2021-2023 (approved by the government), objectives:
- Development of “zero tolerance” approach against corruption

- Building integrity, responsibility and transparency in the work of public administration bodies and strengthening the citizens' trust on public institutions
 - Improving legislation and strengthening institutional capacities for prevention and fight against corruption
 - Public awareness raising and education of general public in the anti-corruption area
- ⇒ **SDG:** Agenda 2030, SDG 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, target 16.5: Substantially reduce corruption and bribery in all their forms; and target 16.6: Develop effective, accountable and inclusive institutions at all levels.
- ⇒ **UNDP:** United Nations Kosovo Team (UNKT) Common Development Plan (CDP) 2016-2020, outcome 1.1: rule of law system and institutions are accessible to all and perform in a more efficient and effective manner; and to outputs of UNDP Kosovo, 1.1.6 Kosovo anti-corruption institutions are able to monitor, prevent and fight corruption at central and municipal level; and 1.2.1 CSOs have increased capacity in seeking accountability and transparency on fight against corruption.
- ⇒ **SDC:** Strategy for Cooperation 2021-2024, Art. 2 Eastern Europe Cooperation Act – Switzerland's cooperation with the states of Eastern Europe, goal a) to promote and strengthen the rule of law and human rights in these countries and to help build or consolidate their democratic systems, in particular stable political institutions.
- ⇒ **SIDA:** Strategy for Sweden's reform cooperation with the Western Balkans and Turkey for 2021–2027, objective on Human rights, democracy, the rule of law and gender equality.

Adaptability: The project has been able to successfully explore different avenues and opportunities for engagement. As progress was made during different phases of the project, the project shifted its focus from corruption prevention (during SAEK I) to corruption suppression (during SAEK II) to recovery and repatriation of stolen assets (SAEK III), while maintaining close relationship with existing and new institutions to avoid falling back.

Furthermore, in spite of the difficult political situation and restrictions due to Covid pandemic, most of the activities were implemented as planned, and SAEK has managed to have an impact on anti-corruption, by continuing to work with the all relevant governmental bodies, independent institutions, and Assembly of Kosovo. During that period a good progress was made on legislation and policy, through the support to draft laws and the draft anti-corruption strategy 2021-2023, which were approved by the government and are now awaiting adoption by the assembly. National money laundering risk assessment was also adopted by the government during that time. Despite the difficulties, the project managed to successfully facilitate signing of the MoU between the Chief Prosecutor of Kosovo and the Basel Institute on Governance, opening the doors for support for case work in recovering stolen assets hidden in Kosovo and abroad. With regard to capacity development and analysis, two webinars were held on public private partnerships on combating financial crime with more than 350 participants which was a significant number of attendees, considering online delivery.

Future direction: Whereas most of areas the project is involved still remain relevant, and especially the recovery and repatriation of stolen assets which is in its beginning, after 10 years of work on policy and institutional capacity to fight corruption, UNDP ought to build on the momentum and seek avenues to broaden the scope of the anti-corruption portfolio into energy and environment related corruption, which has now become one of the most pressing problems also for Kosovo society.

4.2 Efficiency

In this chapter, the evaluation assesses the extent to which the project made good use of its resources in terms of the i) extent to which the management and administrative arrangements sufficiently ensured the efficient implementation of the project (**governance**); ii) extent of partnership building and coordination of actions among the relevant stakeholders (**partnerships and alliances**); and iii) the added value that UNDP brought to these partnerships and to the project in general (**added value**).

The project organizational structure set by UNDP, had provided for solid quality assurance of implementation, coupled with well-functioning internal and external coordination mechanisms, and strong partnerships and alliances. Notably, UNDP's impartiality and vast experience in the area of anti-corruption and rule of law, coupled with highly efficient and flexible mechanisms in place, able to deliver and adapt fast in a very complex and ever-changing environment, were considered crucial aspects in ensuring successful implementation of the project.

Project governance (management and internal coordination): The project was governed by the Project Board, consisting of UNDP (as Executive), SDC and SIDA (as Senior Suppliers), and government institutions (as Senior Beneficiaries). The Board held three semi-annual meetings so far, and provided detailed comments and guidance on the progress and direction of the project.

The quality assurance was provided by the UNDP Kosovo office – programme staff, namely the UNDP Assistant Resident Representative (ARR) and a Programme Assistant. ARR oversaw the project team work and covered the review and approval of all written outputs of the project and of budget expenditure. The ARR had also conducted period monitoring and field visits, and meetings with key stakeholders to assess the situation and the progress made.

The technical expertise to the Board, to Quality Assurance and the Project Team, was provided by the Chief Technical Advisor (international), also responsible for the M&E aspects of the project implementation.

The day-to-day project management was delegated to the project team, headed by the Project Manager (currently vacant, new appointment expected in September), working together with a Senior Legal Adviser (covering outcomes 1 and 2), a Project Officer (covering outcome 3), and an Admin and Finance Officer.

Furthermore, the project in its implementation was assisted by local and international expert organizations/NGOs, namely ROLAG, Basel Institute on Governance and GAP Institute (outcome 2/capacity development of institutions) and BIRN/KALLXO (outcome 3/civil society and public participation). In addition, the project currently has two embedded Legal Advisors, one at MoJ and one at KACA, to assist with the implementation of outcome 1/legal drafts priorities. It's worth mentioning that GAP Institute and BIRN/KALLXO have been implementing partners to SAEK since phase I, which speaks for itself about the level of trust and cooperation between the implementing partners. The cooperation with ROLAG and Basel Institute on Governance is relatively new and started during phase III, which nonetheless has been able to materialise quickly into positive actions thanks to institutional access and guidance provided by SAEK.

Despite the Covid pandemic, the project structure remained fully engaged and functional, utilising digital platforms for communication and activity implementation. Over time, due to prolonged isolation periods, the interest in online activities waned, but most of them were successfully carried

out nonetheless. The departure of the Project Manager, was successfully backstopped by the existing project staff, with no need to hire interim manager.

An important aspect that facilitated the smooth implementation of the project was that most of the project team members had already worked in the first two phases of SAEK. The fact that the team remained largely the same over the years speaks volumes about the style of management of the project, which was empowering and motivating.

The role and functioning of the Project Board was also highly valued by stakeholders. It was highlighted as a space for the exchange of information and debate on the progress of the project. In addition to the Project Board, the communication channels between the different parties involved in the project were fluid.

Particularly noteworthy is the fact that during the evaluation, no complaint or grievance emerged by stakeholders interviewed, either about the flow of information (e.g. presentations or quality of reports) or about administrative bottlenecks (e.g. late payments or cumbersome mechanisms). In contrary, UNDP mechanisms have been praised for their expedience. Where there have been delays in procurement e.g. with the establishment of the online asset declaration platform, it was affected by external factors linked to delayed implementation of the Law on Asset Declaration, which allows for online declarations, and also due to changes in the management of KACA. Nevertheless, the platform is due for completion in the coming period full operationalisation is expected as soon as the law is adopted.

Chart 2 – SAEK III organizational structure:

Partnerships and alliances (external coordination): The strongest partnership that SAEK III established and strengthened was with the key institutional stakeholders, namely KACA, OCP, FIU and

Supreme Court. This partnership translated into a close collaboration during the design and implementation of much of the project's activities.

Other important alliances established by the project were with MoJ and AoK, especially valuable with respect to drafting of the AC laws and subsequent consultation process in the parliament.

On the side of civil society, partnership with BIRN/KALLXO, which has been ongoing since SAEK II, has been instrumental in generating and maintaining public trust and interest in seeking greater accountability from the government and the judiciary.

The project made significant efforts for better coordination and synergies with international organisations active in the field of anti-corruption, with CoE/PECK, EUSR and U.S. Embassy, by initiating regular semi-annual partnership briefings for the purpose of information sharing on upcoming activities and coordination of efforts, including issuing joint statements such as the case with regard to draft law on corruption prevention. However, the feeling among some of the partners is that there should be more frequent meetings, including informal ones, to strengthen the coordination and avoid doubling of efforts.

Finally, but not least, the funding partners SDC and SIDA played an active role through proactive participation in board meetings, field visits and discussions with the stakeholders on the progress of the activities.

Added value: Before the start of the SAEK project, UNDP in Kosovo had already accumulated a vast experience in the field of anti-corruption since 2004, being actively involved in capacity development of the then newly established KACA. That experience has grown tremendously over the years, and especially during the 10 years of SAEK implementation. In addition, UNDP in Kosovo has also amassed valuable experience in the area of rule of law reform, working with courts, prosecution and police in a number of other projects over the years. Furthermore, UNDP being a UN entity is considered to be an impartial partner, which is highly valuable to the stakeholders amidst competing foreign agendas and priorities. UNDP's impartiality and experience in the project area allowed SAEK to work with a solid network of institutions build on trust acquired as a result of many years of work in the field of anti-corruption and rule of law.

UNDP has also been efficient in terms of resources used for implementation of the project, especially when considering the high complexity area of anti-corruption and volume of work, involving a vast number of institutions and activities ranging from capacity development, technical assistance, policy and strategic advice, to coordination, advocacy and lobbying, both locally and internationally, implemented with a modest project team (chart 2) of four local staff and one international, who also cover much of the expert technical assistance needed by beneficiaries, without having to outsource such expertise in frequent basis. By having in-house expertise also contributed to sustainability and continuity of the actions, partnerships and knowledge transfer over the many years and different phases of SAEK.

4.3 Effectiveness

In this chapter, the evaluation assesses the effectiveness, through i) measuring the extent to which different components were on track towards achieving their expected results (**progress**); and ii) analysing how well the progress towards results was being measured and monitored (**monitoring and evaluating**).

Progress: In this section the evaluation analyses the progress the project has made compared to what was planned under each outcome, assessed against the evaluation matrix, analysing data gathered from semi-structured interviews and document review.

Most of the targets of outcome 2 were achieved, and outcome 3 exceeded, whereas outcome 1 targets remained in progress due to prolongation with the adoption of the draft laws necessary for completion of foreseen activities, which is out of project's control. The key challenge was the adoption of the anti-corruption laws by the Assembly, mainly caused due to lack of quorum. Monitoring of results had improved significantly over the years, especially with regard to processes, but more needs to be done in strengthening demonstration of impact.

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

Outcome 1: Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced in a gender sensitive manner	Overall evaluation assessment for outcome 1: All outcome 1 targets planned by July 2022 – in progress , on track to be achieved during 2022. The key challenge, which is holding the implementation of foreseen activities remains the adoption of the draft laws by the assembly due to lack of quorum, which is outside project's control.
Output/Result and Target (by July 2022)	Results level evaluation assessment
1.1 Policy and legal anti-corruption framework implemented in gender sensitive manner Target: 2 laws and strategies adopted by July 2022	Target achieved: 1 draft law adopted by the Assembly, 1 draft law approved by the government – pending adoption by the Assembly; 1 strategy in process Note: Considering the fact that the 'adoption' of laws and strategies is not in project's control, rather the support to 'drafting' of such is, the evaluation focused on assessment of support to drafting of laws. In total 1 law, 2 draft laws and 4 strategic documents have been successfully supported through drafting stages within the target deadline, namely: - Draft Law on Agency for Prevention of Corruption ³ – recently adopted by the Assembly in June 2022

³ The new Agency on Prevention of Corruption (renamed, previously KACA) will be a specialized Agency dealing with i) conflict of interest, ii) whistle-blowers and iii) deceleration of assets. In addition, the new law will equip the Agency with

	<ul style="list-style-type: none"> - Draft Law on Asset Declaration⁴ – at AoK, 1st reading in process - Draft Law on the State Bureau for Verification and Confiscation of Unjustified Assets – at the MoJ, drafting stages - Draft Law on Financing of Political Entities – approved by the government - National Anti-Corruption Strategy – in process (was pending adoption of the Law on Agency for Prevention of Corruption) - Concept Document on Law on Court Appointed Experts – at the MoJ, public consultation stages; - ROLAG analysis of 141 judgements, of which 100 convicting judgements related to corruption and advice provided to Kosovo Judicial Council to ensure a more uniform implementation in line with the sentencing guidelines.⁵ <p>The project also provided comments to the MoJ on the package of laws related to prosecutorial system.</p>
<p>1.2 AC strategy 2020-2024 effectively implemented in gender sensitive manner</p> <p>Target:</p> <p>25% of measures implemented in gender sensitive manner by July 2022;</p> <p>5 Municipalities and local institutions adopt KACA integrity plans by July 2022</p>	<p>Note: <i>The drafting of the AC strategy and the KACA mandate to monitor the integrity plans was pending on the adoption of the new Draft Law on the Agency for Prevention of Corruption.</i></p> <p>Target in-progress: The project jointly with OPM, MoJ and KACA facilitated the drafting of the AC Strategy. In preparation for the AC strategy, 4 preliminary sectoral assessment reports (on Political, Rule of Law, Public Administration, Procurement and Management of Public Finances) were completed in December 2021.</p> <p>Furthermore, in preparation for implementation of integrity plans, the project jointly with KACA has completed the draft-methodology for integrity plans and conducted a training of trainers for 15 KACA officers. As the new law on the Agency for Prevention of Corruption mandates KACA to monitor the implementation of integrity plans, the implementation of this activity is pending its adoption, expected during 2022, upon which the planned activities will be implemented via the trained KACA officers.</p>

administrative sanctioning powers which will allow the agency to issues fines directly instead of going through the court, as was previously the case.

⁴ The main novelty of the new Law on Declaration of Assets is the online declaration of assets, which was developed by the project, and will enable fast and efficient processing of data in order to avoid human errors that have occurred in the past. In addition, the draft law foresees expansion of the categories to declare assets into two main categories: seniors officials and public officials (more exposed to corruption risks). For the former the declaration of assets will be public, while for the latter category the asset will not be publicised.

⁵ ROLAG's findings revealed that out of a total of 74 convictions, in 45 cases the judgments were not within the parameters set out in the Sentencing Guidelines, while 29 cases or 39% are within the Sentencing Guidelines.

	In addition, the project provided technical assistance to KACA officials in corruption proofing methodology and implementation and monitoring of the Communication Strategy.
1.3 Anti-corruption Strategy and Action 2024-2028 developed in gender sensitive manner Target: 0 by July 2022	N/A: Due to be implemented during 2023-24 period.

Outcome 2: Anti-corruption institutions detect, repatriate hidden stolen assets and process corruption cases effectively	Overall evaluation assessment: All outcome 2 targets planned by July 2022 – achieved
Output/Result and Target (by July 2022)	Results level evaluation assessment
<p>2.1 Anti-corruption institutions have improved tools and capacities to issue charges</p> <p>Target:</p> <p>+10% increase in the number of cases on the previous year;</p> <p>10 cases issued on money laundering charges by 2022;</p> <p>75 individuals investigated through e-platforms by 2022;</p> <p>50 investigators specialized by 2022;</p> <p>#of notaries registered to monitor potential</p>	<p>Target achieved:</p> <ul style="list-style-type: none"> - 10% increase in the number of cases. 1,003 cases in 2020 compared to 901 cases in 2019; - 18 cases sent by the FIU to Special Prosecution in 2020; - 1,124 persons were analysed/investigated by FIU through electronic platform - 16 investigators specialized in 2020 <p>In building public private partnerships (with banks, insurance companies, notaries, accountants, auditors, lawyers, real estate agents, money remittance agencies), for improving coordination and mutual feedback among private sector entities and the FIU, the project delivered 6 specially designed workshops with more than 200 participants, on cryptocurrency money laundering, understanding beneficial ownership, corporate and legal structures and handling Politically Exposed Persons (PEPs) as clients. In addition, the project will begin work on developing corruption money laundering indicators, a risk assessment of the banking sector, and support companies in developing collective action initiatives to jointly level the playing field for procurement contracts and Public Private Partnerships (PPPs).</p> <p>With regard to trainings of court and prosecution staff, the project supported the development of a curriculum for corruption offences aimed at professional associates (legal advisors) and legal officers (legal clerks) in courts and prosecution offices, published by the Academy of Justice in December 2021. At the request of stakeholders,</p>

<p>corruption and enhance reporting cases by 2022.</p>	<p>the project's implementing partner – the Basel Institute, developed a training for law enforcement institutions and judges in cryptocurrencies related to prevention and combatting of money laundering.</p> <p>In addition, the project, in partnership with the Council of Europe/PECK III project, provided support in defining the mandate and scope of the newly established Strategic Analysis Department within the FIU.</p> <p>Furthermore, the project is supporting the Ministry of Justice and the Chamber of Notaries to design and develop an online Notarial Case Management Platform to monitor potential corruption risks, which will enable the automatic transfer of notarial data on movable and immovable transactions to the Tax Administration of Kosovo (TAK) for further investigation.</p>
<p>2.2 Successful adjudication of corruption cases</p> <p>Target:</p> <p>+10% amount of preliminary assets confiscated on the previous year by 2022;</p> <p>+10% amount of final assets confiscated on the previous year by 2022.</p>	<p>Target in-progress:</p> <ul style="list-style-type: none"> - 118% increase of the amount of preliminary assets confiscated in 2020 compared to 2019, or 19,182,157.00 € confiscated in 2020 compared to 8,787,307.63 € in 2019; - 52% decrease of the amount of final assets confiscated in 2020 compared to 2019, or 476,490.00 € in 2020 compared to 991,593.00 € in 2019. <p>The Office of the Chief Prosecutor of Kosovo signed an MoU with the Basel Institute on Governance through which six cases were handed over for specialized support in uncovering stolen assets hidden in foreign jurisdictions. In addition, the Basel Institute on Governance has developed a specially designed ToT curricula for investigators on assets recovery, which was adopted by the Academy of Justice.</p> <p>Furthermore, ROLAG in cooperation with the National Coordinator for Fighting Economic Crime (National Coordinator) produced a paper on the establishment of a 'know-how forum' for professional-level discussions on issues pertinent to asset confiscation, to address the practical aspects of asset recovery, including international challenges and best practices. Another paper was produced by ROLAG for the Office of the Chief Prosecutor (OCP), on the Asset Recovery Unit, best international practices and functioning in other countries. Following this, it has been agreed that the Asset Recovery Office is to be transferred from the Kosovo Police (KP) to the OCP, and will serve as an advisory body to OCP, and it shall be composed of representatives of Police, FIU, Tax Administration, Customs and other law enforcement agencies, as needed. To this end, ROLAG has developed an internal Draft Regulation on the Establishment of the Asset Recovery Unit which determines the organization, manner of work, activity and competencies of the Unit and sent it out for comments from stakeholders.</p>

<p>2.3 Citizens are more aware of their rights and responsibilities on public transparency and accountability increased, with focus on vulnerable women and marginalised groups</p> <p>Target:</p> <p>100 irregularities observed and found by 2022;</p> <p>50 applications for the best essay in the field of public finance as a part of International Anti-corruption Day by 2021;</p> <p>2 policy papers and other studies published on monitoring the public spending patterns by 2022;</p> <p>4 updates of budgetary data in the GAP Platform by 2022.</p>	<p>Target exceeded:</p> <ul style="list-style-type: none"> - 12 irregularities/categories identified by GAP Institute in the Covid Economic Recovery Package; - 62 applications/essays, 28 in 2020 and 34 in 2021 - 2 policy papers/studies and 4 articles published by GAP Institute - 3 updates of budgetary data in the GAP Platform during 2021 <p>The GAP Institute achieved significant results in increasing citizen awareness and engagement on transparency and decision making, through production of reports and infographics on the Covid Economic Recovery Package, capital investments, and its signature budget platform on expenditures from central and local institutions.</p> <p>Furthermore, GAP for the second year in a row, in marking the International Anti-corruption Day, organized the essay competition, focusing on topics such as women empowerment and women's inclusion in the Covid Economic Recovery Package, designed to depict main challenges faced by women in the labour market in Kosovo, and analyse the measures taken by the government to tackle women's employment during the pandemic. purpose of this activity is to engage students in the policy making process and bring to attention the important issues affecting women.</p>
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Outcome 3: Civic engagement mechanisms to hold institutions accountable strengthened	Overall evaluation assessment: All outcome 2 targets planned by July 2022 – exceeded
Output/Result and Target (by July 2022)	Results level evaluation assessment
3.1 Public institutions are more responsive and effective in resolving cases of corruption brought forth by the public through CSOs	<p>Target exceeded: During July 2020 – June 2022, the Kallxo platform results shown below demonstrate significant progress made, much of which is attributed to SAEK support:</p> <ul style="list-style-type: none"> - 2,795 reports from citizens received - 1,235 reports were verified, 45% of total cases - 1,079 follow-ups with institutions - 24,982 articles published

<p>Target:</p> <p>30% of cases processed by Kallxo by 2021;</p> <p>20 sanctions issued by relevant authorities by 2021;</p> <p>+10% on the previous year/increase number of social media followers by 2021;</p> <p>+20% high schools compared to previous year;</p> <p>at least one hundred subscribers by 2021.</p>	<ul style="list-style-type: none"> - 65 web TV shows being broadcast - 65 cases submitted to the authorities for alleged corruption, - 100 tax evasion reports were filed, and - 160 businesses were fined based on tip-offs from the public. - 40 people were arrested - more than 10 big cases were opened in the courts for corruption - 2 former ministers, 2 mayors, 2 municipal directors, 30 police officers, 1 prosecutor, 2 medical doctors, 10 public officials, - Out of these cases one mayor was sentenced with prison, 1 medical doctor, 15 police officers, one businessman. - As a result of follow-ups disciplinary measures were initiated against 10 prosecutors, judges and public officials, 3 out of those were sentenced <p>Currently Kallxo.com platform has 404,188 followers, compared to 243,069 or 60% increase since 2019.</p> <p>Furthermore, in 2021 Kallxo held training sessions with High Schools in Gjilan/Gnjilane and Fushe-Kosove/Kosovo-Polje municipalities. The training was aimed at students of Kosovo's state-run high schools that are interested in undergoing training in media production, media literacy, ethics, tackling fake news, and producing videos and photography.</p>
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Monitoring and evaluating: The project's monitoring system contains clear and measurable indicators. However, targets although clear and measurable, were often too ambitious and out of project's control. Worth mentioning here are targets related to adoption of the laws, which are clearly out of project control. It would be more realistic target to state "support to drafting of the laws" rather than "adoption of the laws".

Progress reports were clear and timely and provided sufficient information to meet the requirements of UNDP and donors. Furthermore, the gender disaggregation of data was carried out consistently throughout activities as related to legal drafting, trainings and webinars, research, recruitments and appointments, and participation in advocacy activities.

However, because the logical framework indicators and targets were only quantitative, monitoring was more likely in most cases able to capture information about processes i.e. how activities were implemented, rather than impact. The exception here are indicators and targets related to confiscation, which clearly demonstrate impact although they're quantitative. The other exception is reporting by Kallxo who managed to clearly demonstrate the impact of citizen's reporting of corruption, through case studies, presentations, documentaries, etc.

Main challenges: Besides the challenges faced with the adoption of the draft laws by the assembly, still one of the biggest problems highlighted by many stakeholders is lack of finalization of corruption cases with serious sentencing and confiscation of assets. This is mainly due to the problems with evidence gathering and presentation by prosecutors, however there are also cases when certain judges hold onto until it expires. These cases where trials are held and accused officials are "cleared" with court decisions due to lack of evidence, often as a result of poor investigation or worse due to expiry time, endangers the public trust in fight against corruption and may lead to decrease of public

support for reporting corruption. KPC and KJC ought to be supported and urged in improving the implementation of the performance standards set and sanction such practices within their ranks.

4.4 Impact

In this chapter, evaluation assesses what was achieved, how change happened as a result of (or as a contribution to) the project, in three main areas: i) **individual transformations**, ii) **organisational/systemic transformations**, and iii) **societal transformations**. The assessment in this chapter also assesses the potential for impact from the gender perspective.

Individual transformations: The individual level transformations are most evident in cases where a long-term certified training or on the job support was provided. For example, the training of special prosecutors, who underwent a year-long certified training in money laundering and financial investigations. The training enabled the special prosecutor interviewed to apply the learnings in practice, which has positively impacted the quality of investigations carried. Due to very complex nature of the cases, the best practices learned through the training, enabled the special prosecution to effectively identify the potential pitfalls during investigation and remedy them, which would otherwise render the case invalid before the court, risking much of time and resources invested in building up the case. Another good example of individual level transformation was demonstrated by the acting director and staff of the FIU, who had participated in continuous high-level trainings, meetings and conferences. This contributed to a change in perception around importance of partnerships with various public and non-public actors, as an effective tool against money laundering and corruptive practices, which had increased the motivation and commitment of FIU in forging new private-public partnerships, that were absent previously. Furthermore, on the job assistance provided to the KACA staff, proved to be an effective tool for increasing individual level productivity and effectiveness in reviewing asset declarations, drafting numerous legal opinions, and conducting investigation of cases.

The individual level transformations were most evident in cases where a long-term certified training or on the job support was provided, such as has been the case with special prosecutors, FIU and KACA. The organisational/systemic transformations were best demonstrated through a combined institutional effort such as the case with the freezing and confiscation of illicit funds. Whereas, societal level transformations involve citizens and cultural change, which were best demonstrated through the reporting of crime cases and spiralling effects created in terms of prompting institutions to act, which in turn generated greater public confidence to report such cases. Most importantly, significant efforts were made to mainstream gender across all activities, achieving overall women participation at around 40%, which considering the male dominated institutions (only around 30% are women) was a remarkable achievement despite falling short of the set target of 50%.

Organisational/systemic transformations: This level of transformations is more evident in terms of combined organisational efforts related to freezing and confiscation of assets, which are yielding promising results in recent period, speaks volumes about the maturity and transformation of institutions. In 2021 alone, 9 mil. euros in funds were frozen, compared to 7 mil. euros in total frozen during the entire period of 2004-2020. Furthermore, as a result of FIU's successful organization of several international conferences on money laundering and cryptocurrency fraud, great engagement with the private sector, public private partnership on detecting money laundering and successful completion of the National Risk Assessment, Kosovo's candidate was elected Vice Chair of the Egmont Group of FIUs (the global organization of FIUs that comprises over 160 members). This is extraordinary given that Kosovo is a new member of Egmont and no Vice Chair has ever been elected from southeast

Europe. This achievement showcases increased capacities of Kosovo's FIU in the past five years and in that SAEK played a significant role through supporting the candidacy and improving the Kosovo FIU's results, particularly in private public partnerships. International recognition of Kosovo institutions and staff and their appointment in important positions in global organizations, is a tremendous organizational achievement.

Societal transformations: This level of transformation is best demonstrated throughout outcome 3, whereby Kallxo platform has been able to demonstrate how an efficient citizen reporting platform can generate spiralling effects at institutional level in terms of response to cases reported by the citizens, many of which end up to be valid cases, resulting in sentencing of individuals or group of individuals, both private and public. The second important level of impact is the cultural aspect, whereby by demonstrating that citizen reporting works, such has been the case with Kallxo platform, more and more citizens become aware, build confidence, and increasingly report crime cases. Currently Kallxo platform has 404,188 followers, compared to 243,069 or 60% increase since 2019.

Below, two selected case studies are presented to demonstrate the social level impact achieved through Kallxo:

Brezovica case

Based on citizen reports in Kallxo.com, an interview with the main witness of this case was held early in 2021. He denounced the involvement of many officials including a high level official of the Shterpce/Strpce municipality, and of the Ministry of Environment, Spatial Planning and Infrastructure, and many other officials accused for corruptive practices and bribery by issuing unlawful environmental permits for construction in Sharri Mountain National Park.

Based on the presented evidence, prosecutors' office in Ferizaj/Urosevac opened the case and by April 2022 more than 20 people were arrested and more than 10 million euros in assets have been seized.

All the data that Kallxo.com gathered was shared with the investigation team, however the story is not published on website based on the request of prosecutor's office, because publication of data could damage the investigation. With the number of high-level officials involved and amount of assets seized Brezovica case is one of the biggest cases in Kosovo.

Karageva case

During September 2020, 73 people were charged by the Gjilan/Gnjilane prosecutors office for Karageva case of illegal casino operations.

The operation was conducted based on the file that Kallxo.com submitted to the Prosecutor's Office. The file contained video footage made by the Kallxo team in the area where the activity took place.

Prosecutor stated that "The operation was carried out based on the information that prosecutor office received from Kallxo."

The case is successful because most of those arrested have pleaded guilty and are awaiting trial, while the most interesting part is that the prosecution has launched financial investigations to verify their assets. The Karageva case will be one of the few if not first cases of confiscation of property after the end of the trial.

Gender dimension: Considering the overall gender composition of the institutions has yet to reach 50% quota for women (currently around 30% overall are women), it has proven difficult for the project to reach the desired target of 50%. Where in project's control, e.g. in recruitment and appointments, the project has managed to reach and exceed the target. Furthermore, the project has conducted specific research on gender i.e. Report on Gender Equality to assist public and private institutions to identify gender related corruption risks and vulnerabilities in their sectors. In addition, to mark the international anti-corruption day, the project published a video was dedicated to gender and anti-corruption and the importance of women inclusion in anti-corruption policies.

In improving gender equality and mainstreaming throughout programmes and strategies, in the beginning of 2021, UNDP Kosovo has established a Gender Focal Team, composed of senior management, communications team, representatives of each project, who will work on the gender strategy of the office, introducing innovative ways of including and mainstreaming gender.

Below are listed some of the gender data on activities carried out during the evaluation period, related to legal drafting activities, trainings, webinars, research, and advocacy activities.

Legal drafting:

- Working Group for the draft Law on the Agency for Prevention of Corruption consisted of 23 members, 10 or **43 %** were women.
- Working Group for the draft Law on the Declaration of Assets consisted of 14 members, 6 or **43 %** were women.
- Working Group for the draft Concept Document on Court Appointed Experts consisted of 16 members, 6 or **37.5 %** were women.

Trainings and webinars:

- July 2020: 35 out of 92 attendees were women or **38%**.
- December 2020: 62 out of 155 attendees were women or **40%**.
- Politically Exposed Persons (PEPs) webinar: 142 participants, 58 women or **41%**.
- Cryptocurrency money laundering webinar: 86 participants, 35 women or **41%**.
- Launch of Money Laundering National Risk Assessment: 79 participants, 30 or 38% were women.
- From a total of 102 participants that attended the four webinars on best anti-corruption practices of anti-corruption agencies in Hong Kong, Latvia, Croatia and Slovenia, 34 or **33%** were women.
- Kallxo high school trainings were attended by a total of 48 participants, of which 37 or **78%** were women.
- Training on crypto currencies was attended by 23 participants, 9 or **39%** were women
- Roundtable on the draft law on financing of political entities was attended by 35 participants, of whom 15 or **43%** were women.
- Two events on 'know-how forum", one with 11 participants, 5 or **45%** women, and one with 15 participants, 4 or **27%** women.

Recruitment and appointments:

- Out of 5 interns recruited for KACA, 4 or **80%** were women.
- The panel for discussion on gender report findings was comprised of 6 members, whereas 5 or **83%** were women.

Research:

The Report on Gender Corruption Risks and Vulnerabilities survey was launched in December 2021, the main findings and recommendations of which may be used for formulating anti-corruption policies and strategies with a gender perspective. Survey had 1440 respondents, of which **35%** were women.

Advocacy:

To mark the International Anti-Corruption Day in 2021, for the second year in a row, project's implementing partner - the GAP Institute organized an essay competition focusing on women empowerment and women's inclusion in the Economic Recovery Package, aiming to engage students in the policy making process and bring to attention the important issues affecting women. The winning essays managed to depict main challenges faced by women in the labour market in Kosovo, and analyse the measures taken by the government to tackle women's employment during the pandemic, and also give recommendations on ways to improve the approach towards women's employment.

4.5 Sustainability

In this chapter, evaluation assesses i) the prospect whether the stakeholders will remain committed and involved on processes established by the project, after the project end; ii) the prospects for the results of the project (individual and organizational transformations) being sustained after the project end; and iii) whether the project applied a concrete and realistic exit strategy to ensure sustainability.

Project's systematic approach in improving the legislative and policy framework against corruption, coupled with measures for increased effectiveness of anti-corruption institutions and strengthened civic engagement mechanisms to hold institutions accountable, provided a solid basis to build sustainability of the anti-corruption system in Kosovo. The potential for greater sustainability was generated through strengthening local ownership of results, capacity development measures, multi-stakeholder approach, and public accountability.

Below are some of the main examples how potential for greater sustainability is ensured through local ownership, capacity development, multi-stakeholder approach, and public accountability measures.

Local ownership: SAEK had put strong emphasis on developing an anti-corruption project that is designed jointly with institutions through research and consultations, thus build a system that is there to remain as an institutionally owned system. In line with the theory of change, this approach to anti-corruption is expressed through support i) to the policy, regulatory and monitoring framework on prevention and suppression of corruption (outcome 1); ii) to anti-corruption institutions to detect, to repatriate hidden stolen assets and to process corruption cases effectively (outcome 2); and iii) to strengthening civic engagement mechanisms to hold institutions accountable" (outcome 3).

In enhancing the policy, regulatory and monitoring framework on prevention and suppression of corruption (outcome 1), the project supported the development of the Anti-corruption Strategy (2021-2024) which was adopted by government (pending approval by the assembly) which is pending on adoption of the Law on Corruption Prevention Agency).

All laws are in the process of adoption by the assembly, and once adopted, the processes established will be embedded across all institutions, which guarantees a great degree of continuity of processes supported by the project.

Capacity development: With regard to capacity development activities, which were many, the sustainability has been best insured through training of trainers approach, such has been the case with the Academy of Justice trainers for example. The training program was prepared relating to generic principles and concepts of corruption. The objective of the training was to create a comprehensive Anti-Corruption Training Programme for the Academy of Justice in view of ongoing legal and institutional developments. With Academy of Justice agreement, several trainers (up to 10) were identified for each of the topics and trained according to the programme. The ultimate objective of this training was the accreditation of the programme that could be used by the Academy of Justice in the future for possible interested target groups that would be required to attend this type of training programme. This training outline was developed in cooperation with the EU Project - PECK III and will be delivered jointly.

Capacity development of new institutions, such was the case with the Strategic Analysis Department in FIU, which was supported by SAEK together with the Council of Europe PECK III project, is another good example of building institutional sustainability through carefully though capacity development steps. In this regard, throughout 2021, a number of webinars were held with FIU staff, to determine

the scope and mandate of the new Strategic Analysis Department ensuring the suitability of the process. A needs assessment defining the competencies of the new Unit, staffing and timeline was adopted by the FIU. The trainings were held for FIU analysts on how gather financial data from public and private sources and analyse them to identify trends that are otherwise undetected by normal criminal investigation techniques. Guidelines were drafted by SAEK together with PECK that define the functions of the new unit and how to implement strategic analysis. The guidelines were adopted by the FIU and the Strategic Analysis Department was established as local sustainable intervention for fighting corruption and money laundering activities.

Similarly, Institutional development support of ROLAG in specialization on asset recovery has resulted in ROLAG providing advice to prosecutors on assets recovery and coordination of the Office of the Chief Prosecutor and the Basel Institute on allocating case work. Furthermore, the Basel Institute, with the support of UNDP, has provided technical advice to ROLAG on building their capacities to serve as a knowledge hub and Anti-corruption and Assets Recovery Policy Support Service. Issues addressed included establishing a repository of knowledge products and long-term sustainability. This component has a local ownership and in terms of sustainability works on creation of anti-corruption capacities within Kosovo society, however as with other specialised CSOs, ROLAG is also highly donor driven and lack financial sustainability beyond project funding.

Multi-stakeholder approach: Capacity development interventions with Financial Intelligence Units (FIUs) related to money laundering and cryptocurrencies with an aim of creating public private partnership, are a good example of interventions that ensures a good degree of sustainability in terms of building multi-stakeholder alliances that rely on one another for results. The training addressed an audience of law enforcement agencies (LEAs), prosecutors and representatives of Financial Intelligence Units (FIUs) engaged in financial investigations, prosecutions involved in investigating economic crime and the recovery of illicit assets.

Another good example of multi-stakeholder involvement is the training of private sector entities on anti-money laundering. In this regard two webinars were held in July and December 2020 for representatives of Kosovo's private sector (banks, insurance companies, notaries, accountants, auditors, money remittance agencies, lawyers) as well as police, tax and customs investigators, prosecutors, judges and FIU officials.

Public accountability: One of the best examples of process and result sustainability is the Kallxo platform, which encourages public to demand greater accountability from institutions. In terms of sustainability of the process, interventions relating to the platform for reporting cases of corruption by the public have proved to be very successful and have been replicated in other areas as well, many other civil society organizations or independent citizen initiatives such as 'Neighbourhood Watch' Facebook group, have created similar platforms for the report of problems with public infrastructure, problems with public services, work on municipalities and other related areas. Replication of the logic of interventions indicates that this approach has been endorsed by wide public and it is perceived as great success story.

Exit strategy: The findings demonstrate that the project's systematic approach in improving the legislative and policy framework against corruption, coupled with measures for increased effectiveness of anti-corruption institutions and strengthened civic engagement mechanisms to hold institutions accountable, provides a solid basis to build sustainability of the anti-corruption system in Kosovo. The project as such has been designed with an aim to provide for greater institutional sustainability, in particular, by strengthening local ownership through participatory approaches in involving key stakeholders in the design of the project and its activities. Due to the fact that the project is going to run for two more years the implications on sustainability are not significant at this stage.

However, exit-strategy steps should be prioritized as of now, for the remaining period of the project. One area to pay specific attention is the sustainability of Kallxo platform, as the scale it operates now is still dependent on donor funding, and the sustainability of results achieved through is platform would be significantly impacted after the project ends. Further support is needed in assessing and identifying a business model that is not dependent on donor funds.

V Conclusions

The following are the key conclusions stemming from the evaluation analysis of project's relevance, efficiency, effectiveness, impact and sustainability:

RELEVANCE:

- ⇒ The project was structured well in three outcome areas, containing results, indicators, targets, and activities, organized around a clear Theory of Change.
- ⇒ The project actions were highly relevant to the context and aligned well with key government and international strategies and priorities.
- ⇒ The project managed to successfully adapt changes to the activity delivery and overcome the challenges during the Covid pandemic.

EFFICIENCY:

- ⇒ The project organizational structure set by UNDP, had provided for solid quality assurance of implementation, with well functioning internal and external coordination mechanisms, and strong partnerships and alliances.
- ⇒ UNDP's impartiality and vast experience in the area of anti-corruption and rule of law, coupled with highly efficient and flexible mechanisms in place, able to deliver and adapt fast in a very complex and ever changing environment, were considered crucial aspects in ensuring successful implementation of the project.

EFFECTIVENESS:

- ⇒ Most of the targets of outcome 2 were achieved, and outcome 3 exceeded, whereas outcome 1 targets remained in progress due to prolongation with the adoption of the draft laws necessary for completion of foreseen activities, which is out of project's control.
- ⇒ The key challenge was the adoption of the anti-corruption laws by the Assembly, mainly caused due to lack of quorum.
- ⇒ Monitoring of results had improved significantly over the years, especially with regard to processes, but more needs to be done in strengthening demonstration of impact.

IMPACT:

- ⇒ The individual level transformations were most evident in cases where a certified long-term training or on the job support was provided, such has been the case with special prosecutors, FIU and KACA.
- ⇒ Organisational/systemic transformations were best demonstrated through a combined institutional effort such as the case with the freezing and confiscation of illicit funds.
- ⇒ Societal level transformations involve citizens and cultural change, which were best demonstrated through the reporting of crime cases and spiralling effects created in terms of prompting institutions to act, which in turn generated greater public confidence to report such cases.
- ⇒ Significant efforts were made to mainstream gender across all activities, achieving overall women participation at around 40%, which considering the male dominated institutions (only around 30% are women) was a remarkable achievement despite falling short of the set target of 50%.

SUSTAINABILITY:

- ⇒ Project's systematic approach in improving the legislative and policy framework against corruption, coupled with measures for increased effectiveness of anti-corruption institutions and strengthened civic engagement mechanisms to hold institutions accountable, provided a solid basis to build sustainability of the anti-corruption system in Kosovo.
- ⇒ The potential for greater sustainability was generated through strengthening local ownership of results, capacity development measures, multi-stakeholder approach, and public accountability.

VI Lessons Learned

Local ownership: The project understood early on the importance of building local ownership of processes and results, evidently so by focusing on demand driven initiatives, joint drafting of policy and legal acts, followed by capacity development measures, and eventual handover to relevant institutions.

E-tools: In terms of e-tools, for the sustainability of their usage, it is very important that they are developed in a participatory manner, that they are functional and demonstrate efficiency gains to the institutions using them. These steps ensure that the usability of such tools will be sustained over time. Furthermore, it is important to ensure that institutions using e-tools have the needed capacities to operate and maintain such systems, before embarking in developing them.

Managing change: The project focus in working more with civil servants where possible, rather than politically appointed officials, ensured that ambitious goals are followed through, despite frequent elections and government changes (3 government changes during 2020-21).

Challenge as an opportunity: Restrictions posed by Covid-19 pandemic on in-person meetings was challenge and affected implementation, however it also presented an opportunity. Specifically, trainings organized together with FIU could not have such a huge audience if not organized online. In some cases, online virtual platforms provided opportunity to engage more than 200 participants at a time, from different sectors and regions, which otherwise would not be possible in physical space and would cost beyond budgetary limits.

Motivation and capacity for development: Interviews with trainers highlighted one critical points for successful trainings, the need for participants who have minimal capacities to understand and are motivated for change. The capacities of participants to absorb and gain skills/competencies are critical together with motivation, therefore screening and preparatory work for selection and motivation of participants should be standard procedure.

VII Recommendations

The evaluation recommends that during the course of the remaining phase, the project undertakes the following measures:

KACA: SAEK needs to take quick steps in finalizing the online asset declaration platform for KACA, focusing on modules that are not dependent on the adoption of the law on asset declaration, whereas the asset declaration module can also be finalised but not activated until the law is adopted. This will allow KACA to start with the digitalization of some of the internal process, which they're eager to do at soonest (**urgent measure**).

FIU: The newly established Strategic Analysis Department has started to produce notable results in a short time frame, however further bilateral support from a foreign FIU is needed to gain practical knowledge of how to enhance strategic analysis and operationalize findings further. SIDA is well known to have mechanisms to engage Swedish agencies in assisting sister agencies in the region, an option that the project could explore further in discussion with SIDA.

KALLXO: Kallxo platform, although sustainable to an extent due to eco-system of products (news, shows, analysis, etc.) build around it, the scale it operates now is still dependent on donor funding, and the sustainability of results achieved through is platform would be significantly impacted after the project ends. Further support is needed in assessing and identifying a business model that is not dependent on donor funds.

Gender: Follow-up on the report on Gender Corruption Risks and Vulnerabilities survey, in formulating anti-corruption interventions with a gender perspective, addressing women vulnerabilities in particular, especially the ones related to nepotism, favouritism and patronage in the civil service.⁶ In this regard, Integrity Plans offer the best opportunity for integrating novel practices in tackling nepotism, favouritism and patronage in the civil service from gender perspective. The project can start in developing such guidance now, to be ready by the time the draft law that mandates KACA with development and monitoring of integrity plans, is adopted. With regard to women participation in project activities, especially at the local level, which is expected to be the case with Integrity Plans, the project should seek to hold as many activities in spaces other than hotels and restaurants. Holding activities in public spaces, for example schools, municipal halls, NGO premisses, etc. may prompt more women to participate.

Sustainability and exit strategy: Given that the project is the third phase, with two more years remaining until end of project, the upcoming implementation period should focus on sustainability. SAEK team should take immediate steps in ensuring gradual exit from activities, moving towards more of an advisory role. No new emerging priorities or activities ought to be undertaken without a clear exit strategy in place. The team is encouraged to develop a clear exit strategy in participatory manner with each of the stakeholders involved and in close coordination with funding partners SDC and SIDA.

Future direction: As SAEK is completing the third phase of implementation, which by the end will mark 12 years in working with key government institutions in strengthening policy framework and institutional capacities to tackle corruption, whereas most of it still remains relevant, most pressing one, today, is the establishment of a system for the Verification of Unexplained Wealth. It is a

⁶ 94% of civil servants surveyed at the central level listed nepotism, favouritism and patronage as the main forms of corruption that exist across the civil service in Kosovo.

government priority – and the Venice Commission, recently, in June 2022, issued an Opinion on the draft law which gave Kosovo a green light to go ahead with the law. This is also a logical progression of SAEK's work. Namely, the central digital platform would be the SAEK created Wealth Discrepancy Database. While the staff would comprise of investigators who have already been trained in stolen assets recovery through SAEK. And finally, SAEK has extensive experience in drafting regulations and SOPs, which would be the most labour intensive activities that the government would need. Furthermore, the MoJ has also requested UNDP's support through a project and offered to help fund raise with potential donors. On another note, UNDP ought to build on the momentum and broaden the scope of the anti-corruption portfolio also into energy and environment related corruption, which has now become one of the most pressing problems also for Kosovo, as reported by Kallxo in relation to corrupt processes of issuing building permits in Brezovicë/Brezovica, issuing of irregular environment licences for the building of hydropower stations in Kaqanik/Kacanik, Brezovicë/Brezovica and Deqan/Decane areas, irregularities with licences for mineral exploitation as reported in UNDP's 'Corruption Risk Assessment – Kosovo Extractive Industries Sector', and numerous other cases. In doing this, undertaking a comprehensive scoping study jointly with the government at the earliest opportunity, is strongly suggested.

ANNEXES

Annex 1: Documents and literature

- UNDP (2020). Project Document: Support to Anti-corruption Efforts in Kosovo – SAEK III
- UNDP (2020). SAEK III Narrative Progress Report July – December 2020
- UNDP (2021). SAEK III Narrative Progress Report July – December 2021
- UNDP (2021). SAEK III Narrative Annual Progress Report July 2020 – June 2021
- SAEK III (2021). Project Board Meeting Minutes. 28 September 2021
- SAEK III (2021). Project Board Meeting Minutes. 23 February 2021
- UNDP Kosovo SAEK III. (2021). short summary of Anti-Corruption Partnership Briefing. Nov 2021
- SAEK III (2022). SAEK III PROJECT BOARD MEETING MINUTE. 4 March 2022
- SAEK Press Release, 10 June 2021, Launch of the Money Laundering and Terrorist Financing National Risk Assessment
- European Union Office in Kosovo (2020) Legislative Review Mechanism Consolidated Legal Opinion concerning the Draft Regulation on determining the procedure for receiving and handling the cases of whistleblowing. December 2020
- European Commission (2021). Kosovo Report. 14 October 2021
- Draft Proposals Public Consultation Draft Law for Agency Prevention Corruption
- Draft Proposals Public Consultation Draft Law for Agency Prevention Corruption
- EU UNDP comments to draft Rule of Law Strategy and Action Plan February 2021
- EGMONT (2021). Best EGMONT Cases 2014-2020
- European Union Office in Kosovo (2020) Consolidated Legal Opinion concerning the Draft Law on Declaration, Origin and Control of Assets. October 2020
- Gender Specific Corruption Risks and Vulnerabilities in the Public and Private Sector
- Money Laundering Typologies
- Understanding beneficial ownership and legal arrangement combatting money laundering
- Policy paper on Corruption and Vulnerable Groups
- Transparency International (2022). 2021 Corruption Perceptions Index
- UNDP Public Pulse Brief XXI

Annex 2: Meetings Agenda

Day/Time	Institution	Participants	Evaluation Team	Meeting type, place
Monday, 30 May 2022				
17:00- 18:30	UNDP SAEK III	Mato Meyer, Rrezart Reka, Albert Avdyli	KL and MH	In person, UNDP Office
Friday, 3 June 2022				
13:30- 14:30	Ministry of Justice, adviser	Florent Spahija, Adviser	KL & MH	In person
14:30- 15:30	SAEK III	Elfije Krasniqi, Project associate	KL and MH	In person, UNDP Office
15:45- 16:45	UNDP	Valbona Bogujevci, P ARR & Programme Coordinator	KL and MH	In person, UNDP Office
Monday, 6 June 2022				
09:00- 10:30	Kosovo Anti-Corruption Agency, (KACA)	Yll Buleshkaj, Director of KACA Blerim Kelmendi, Director of the Department for Combating Corruption	KL & MH	In person, KACA offices
11:00- 12:00	KACA	Veli Hoti, advisor to KACA	KL and MH	In person, KACA offices

13:30- 14:30	Kosovo Judicial Academy	Enver Fejzullahu, Director KJA	KL and MH	In person, KJA offices
15:00- 16:00	DOJ/OPDAT US Embassy	Blenina Kusari, Senior Legal Specialist, DOJ/OPDAT US Embassy	KL & MH	Online meeting via "zoom"
16:30- 18:30	Internews Kosova KALLXO.com	Faik Ispahiu, director Internews Kosova, Jeta Xhara, BIRN Albulena Sadiku, Kreshnik Gashi,	KL and MH	In person, Internews Kosova Offices
<u>Tuesday, 7 June 2022</u>				
08:30- 09:30	Office of the Chief State Prosecutor	Agron Qalaj, Prosecutor	KL and MH	In Person State prosecutor Office
10:45- 11:45	Ministry of Justice	Ardian Bajraktari, Head of Legal Office,	KL and MH	In person,
13:30- 14:30	Supreme Court	Enver Peci, President	KL and MH	In person, Supreme Court, Palace of Justice
<u>Wednesday, 8 June 2022</u>				
09:00- 10:00	Special Prosecutor Office	Naim Abazi, Prosecutor	KL	In Person, SP Office
10:45- 11:45	GAP Institute	Agron Demi, Research Director Blendi Hasaj, Executive Director	KL and MH	In Person, GAP institute
	ROLAG	Flakrina Osmani, Director Florent Emini, Legal Officer	KL and MH	In Person, GAP institute
<u>Thursday, 9 June 2022</u>				
09:00- 10:00	European Union	Hugo Rascao, Legal Adviser Jarno Feliks Helppikangas, Legal Adviser	KL and MH	Online, "Zoom" meeting
10:45- 11:45	Assembly of Kosovo	Adnan Rustemi, MP, Head of Committee on Legislation	KL and MH	
13:30- 14:30	SIDA	Mirniye Stublla, SIDA Program Manager	KL and MH	In person, SIDA offices
15:00 16:00	UNDP, debrief and preliminary results	Maria Suoko, Resident Representative, Neils Knudsen, Deputy RR, Valbona Bogujevci, ARR,	KL and MH	UNDP Office
<u>Friday, 10 June 2022</u>				
09:00- 10:00	POLCON	Fitim Mulolli, CEO Polcon	KL and MH	In person
10:30- 11:30	SDC	Berat Thaqi National Program Officer	KL and MH	SDC Offices
13:00-14:00	Assembly of Kosovo	Besnik Tahiri, Head of working group for the anti-corruption draft-laws at Parliament	KL	AoK offices
16:00- 17:00	Basel Institute	Peter Wilson, Program Office Jonathan Spicer, Senior Asset Recovery Specialist Stephen Ratcliffe, Senior Investigation Specialist Phyllis Atkinson, Head of Training ICAR Thierry Ravalomanda, Senior Asset Recovery Specialist Iker Lekuona, Head of Programme	KL and MH	Online ZOOM meeting
<u>Wednesday, 15 June 2022</u>				
10:00-11:00	PECK EU Project	Vlora Marmullakaj, CoE PECK EU Project	MH	In person
<u>Monday, 20 June 2022</u>				
	Financial Intelligence Unit	Behar Xhema, Acting director	MH	In person

Annex 3: Evaluation Matrix

KEY Questions to be addressed by evaluation	TOR Questions	Data collection and analysis tools
1. Relevance: Understanding how appropriately the identified problems and the interventions responded to the needs of the targeted beneficiaries and other key stakeholders throughout the life of the project.		
Design: Are the expected results clearly defined, both quantitatively and qualitatively, and were they achievable with the planned approach and resources?	<ul style="list-style-type: none">- To what extent were lessons learned from other relevant projects considered in the project’s design?- To what extent/Is the project relevant in terms of the needs and potentials/resources of the key stakeholders and beneficiaries? What were the main circumstantial factors taken into account in the project plans and implementation?- Is sufficient local ownership demonstrated?- Have there been any changes in policies and strategy development that have affected the project? If yes, have necessary revisions and adaptations been designed?- To what extent has the project been appropriately responsive to political, legal, economic, institutional, etc., changes in the country?- What are the areas of relevance for future interventions in the target area?	Desk review In-depth interviews
Adequacy: Is the project addressing the nature and scope of the challenges facing by targeted beneficiaries? In addressing these challenges, to what extent has taken into account the needs and demands as well as the assets and resources available of key stakeholders and beneficiaries?		Desk review In-depth interviews Direct Observation
Alignment: Were project’s interventions clearly within stakeholders’ mandate and congruent with their strategic framework?		Desk review In-depth interviews
Adaptability: How responsive has the project been to new policies and strategy development occurring after project design?		Desk review In-depth interviews
Future: What are the areas of relevance for future interventions in the target area?		Desk review In-depth interviews
2. Efficiency: Assessing the extent to which the project made good use of its financial and human resources		
Governance (internal coordination): To what extent the management and administrative arrangements sufficient to ensure efficient implementation of the project. Clarity and adequacy of roles; responsibilities; decision making procedures; and information flows.	<ul style="list-style-type: none">- 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)- Are the management and administrative arrangements sufficient to ensure efficient implementation of the project?	Desk review In-depth interviews

Partnership and alliances (external coordination): Extent towards the project implemented the commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability among all relevant stakeholders.	- How has donor coordination impacted the efficiency of implementation and results?	Desk review In-depth interviews
Added value: 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).		Desk review In-depth interviews
3. Effectiveness: Assessing the extent to which the project has its expected results (what has been done?)		
Progress: Have different components of the project achieved the expected results? What challenges have been faced? What has been done to address the potential challenges/problems?	- To what extent Is the project on track to achieve its expected results? What has been achieved? - How have the synergies between the responsible implementing partners and UNDP contributed to project goals? - What challenges have been faced? What has been done to address the potential challenges/problems? - Are the expected results clearly defined, both quantitatively and qualitatively, and are they achievable with the planned approach and resources?	Desk review In-depth interviews Direct Observation
Monitoring, evaluating and learning: How appropriately was progress towards results measured and monitored? To what extent were intended results (outputs, outcomes) adequately defined, appropriate and stated in measurable terms, and are the results verifiable?		Desk review In-depth interviews
4. Impact: Building a mature understanding of how change is happening as a result of (as a contribution of) the project, including an analysis of unexpected changes and expected changes in unexpected audiences.		

<p>Individual, organisational/systemic and societal level transformations: To what extent did the project contribute to positive transformations on the targeted beneficiaries?</p>	<ul style="list-style-type: none">- Has the project appropriately reached its target groups? Is the project serving the needs of vulnerable groups, i.e. women, youth, minorities?- Have the capacity development measures served the needs and demands of the stakeholders? What has been achieved in institutionalizing the acquired knowledge and skills?- In what ways could the project improve its efforts in the second half of project’s implementation toward achieving the expected results and maximizing impact?- How has the project implemented the commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability?	<p>Desk review In-depth interviews Direct Observation</p>
<p>To what degree beneficiaries reacted favourably to the capacity development?</p> <p>To what degree beneficiaries acquired the intended knowledge, skills, attitudes, confidence and commitment based on their participation in a capacity development event?</p> <p>To what degree beneficiaries apply what they learned or what they have acquire during when they are back on the job?</p> <p>To what degree targeted outcomes occur as a result of the capacity development?</p> <p>To what degree were the assumptions, factors or risks appropriately defined in the project design?</p>		
<p>Gender dimension: What effects were realized In terms of gender equality, If any?</p> <p>Were women and men distinguished in terms of participation and benefits within project?</p>		<p>Desk review In-depth interviews</p>
<p>5. Sustainability: Identifying aspects of the projects that are likely to be sustained after their completion, including an analysis of the factors for sustainability.</p>		

Process: What are the prospects that key stakeholders will remain involved in this process once the project had finished?	- To what extent do stakeholders support the project's long-term objectives? - How will the project ensure sustainability of its results and impacts when the project will have ended (i.e. continuity of developed capacities, use of knowledge, improved practices, etc.)? - Does the project have a concrete and realistic exit strategy to ensure sustainability? - In case of sustainability risks, are sufficient mitigation measures proposed?	Desk review In-depth interviews
Results: What are the prospects for the results of the project (individual and organizational transformations) being sustained after the project end?		Desk review In-depth interviews Direct Observation
Exit strategy: Did the project apply a concrete and realistic exit strategy to ensure sustainability?		Desk review In-depth interviews

Annex 4: Project Results Framework

UNDP Strategic Plan relevant output:
Output 1.2.3: Institutions and systems enabled to address awareness, prevention and enforcement of anti-corruption measures to maximize availability of resources for poverty eradication
Outcome 1: Rule of law system and institutions are accessible to all and perform in a more efficient and effective manner Output 1.1 Perception of corruption reduced in the public
UNDP Results and Resources Framework for Kosovo:
Project title: Support to Anti-corruption Efforts in Kosovo III (SAEK III)
Project's Goal: reduce corruption in targeted Kosovo public institutions, to set up a functioning assets recovery system to identify and repatriate stolen assets, and to more efficiently process and adjudicate corruption cases.

EXPECTED OUTPUTS	OUTPUT INDICATORS	DATA SOURCE	BASELINE		TARGETS (by frequency of data collection)					DATA COLLECTION METHODS & RISKS
			Value	Year	Year 1	Year 2	Year 3	Year 4	FINAL	
Outcome 1: Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced Indicators: # Anti-corruption laws, strategies developed Baseline: 0 Target: 3 Laws; 2 Strategies										
Output 1.1 Policy and legal anti-corruption framework implemented in gender sensitive manner	1.1.1 Number of anti-corruption policies and laws (bylaws, regulations, SOPs) adopted in line with the UNCAC and relevant	Official gazette and internal reports	3	2019	2	2	2	2	8	Based on the 2019 UNCAC GAP Assessment, EU Annual Reports, KACA reports adopted and pending anti-corruption legislation will be evaluated against the

	international standards, and gender balanced by 2024									intended impact. A risk remains that some pending legislation and policies will not be adopted timely due to political circumstances, however support to the implementation of existing legislation/policies will continue.
Output 1.2: AC strategy 2020-2024 effectively implemented in gender sensitive manner	1.2.1 Percentage of measures implemented in gender sensitive manner, of the Action Plan of the Anti-Corruption Strategy 2020-2024 by 2023	Report of the Kosovo Anti-Corruption Agency	0	2019	25%	25%	25%	25%	100%	The online tool for monitoring the implementation of the AC Strategy will clearly indicate progress achieved, measure the effectiveness of implementation and flag potential bottlenecks.
	1.2.2 # Municipalities and local institutions adopt KACA integrity plans	KACA Integrity Plan online database	0	2019	5	5	5	5	20	Reports generated through KACA's online database of integrity plans developed by SAEK II
Output 1.3: Anti-corruption Strategy and Action 2024- 2028 developed in gender sensitive manner	1.3.1 Anti-corruption Strategy and Action Plan 2024-2028	Official Gazette and internal reports	0	2019	1	0	0	1	2	SAEK III will again support the development of the new Strategy and Action Plan and ensure that it is submitted on time. Due to an ever-increasing backlog on the AoK agenda, a

										risk remains that the AoK again does not adopt it on time.
Outcome 2: Anti-corruption institutions detect, repatriate hidden stolen assets and process corruption cases effectively 1.Indicators: Corruption charges issued Baseline: 1,247 cases, involving 2,319 persons (2018) Target: % 25 increase by 2024										
Output 2.1: Anti-corruption institutions have improved tools and capacities to issue charges	2.1.1 Number of new cases issued on corruption charges	Court and prosecution records	1,247 cases, involving 2,319 persons	2018	+5% on the previous year	+10% on the previous year	+15% on the previous year	+20% on the previous year	+50% on the 2018	Data on court cases and issued indictments are issued by the relevant courts and prosecution offices regularly. Given the low level of confiscated assets and economic crime indictments a marked increase should be visible after the interventions.
	2.1.2 Number of new cases issued on money laundering charges	Court and prosecution records	6 cases, involving 12 persons	2018	8 cases	10 cases	12 cases	14 cases	44 cases	Ibid.
	2.1.3 Number of individuals investigated through e-platforms	Internal reports from the Prosecution, FIU, KACA	20	2018	50	75	100	100	325	The Prosecution, FIU and KACA have records of cases initiated through their respective online platforms and can provide this information in numeric form.

	2.1.4 Number of investigators, women and men, specialized in assets recovery investigative techniques	Internal reports from the Prosecution, FIU, KACA, Tax, Customs authorities	43	2019	50	50	50	50	200	Licenses issued by the relevant local authority.
	2.1.5 Number of notarial cases registered to monitor potential corruption and enhance reporting	Cases from the Notary Chamber of Kosovo (notary offices)	0	2020	All cases for 2020	All cases per relevant year	All cases per relevant year	All cases per relevant year	All cases per relevant year	The Notary Chamber ensures cases are registered on the platform by the registered notary cases. The Ministry of Justice monitors the cases registered. The cases for PEPs are also referred to the FIU and the TAK Investigation platform.
Output 2.2: Successful adjudication of corruption cases	2.2.1 Amount of preliminary assets confiscated	EU Annual Report, Court and prosecution records	€ 28 million	2018	+5% on the previous year	+10% on the previous year	+15% on the previous year	+20% on the previous year	+50% on the previous year	ata on court cases and issued indictments are issued by the relevant courts and prosecution offices regularly. Given the low level of confiscated assets and economic crime indictments a marked increase should be visible after the interventions.
	2.2.2 Amount of	EU Annual Report, Court and prosecution records	€ 27,000	2018	+5% on the	+10% on the previous	+15% on the previous	+20% on the previous	+50% on the 2018	Ibid.

	final assets confiscated	on records			previous year	us year	us year	us year		
Output 2.3 Citizens are more aware of their rights and responsibilities on public transparency and accountability increased, with focus on vulnerable women and marginalised groups	2.3.1 Number of irregularities observed and found within the monitoring the transparency and allocation of the “Economic Recovery Package”;	Project Reports	0	200	100	100				The data shall be collected through the monitoring of the documents and other disclosed information by public authorities in the implementation of the recovery package.
	2.3.2 Number of applications for the best essays in the field of public finance as a part of International Anti- corruption Day	Project Report	0	200	50	50	50	50		GAP Institute shall organize the Award for the best essays in the field of public finance as a part of International Anti-corruption Day – the targeted audience are students with interest in the public finance and public administration.
	2.3.3 Number of policy papers and other published monitoring the public spending patterns studies	Project Report	0	8	2	2	2	2		The GAP Institute through its regular monitoring shall produce regular reports either thematic or general on the models and patterns of public spending with emphasis on capital investment and other areas prone to

										corruption and undue influence.
	2.3.4 Update of budgetary data in the GAP Platform	Platform update frequencies		16	4	4	4	4		The data shall be gathered by GAP from public institutions based on access to public documents requests, and will be entered into the platform which will be updated regularly.
Outcome 3: Civic engagement mechanisms to hold institutions accountable strengthened Indicators: Cases of corruption identified, filed and convictions made widely public by kallxo.com Baseline: 852 Cases (2018) Target: 200% Increase										
Output 3.1: Public institutions are more responsive and effective in resolving cases of corruption brought forth by the public through CSO	3.1.1 % of cases processed by Kallxo.com	Kallxo reports	27.3%	October 2017-December 2018	30%	30%	30%	30%	30% (of the total cases)	Kallxo.com reports on the progress of all cases regularly.
	3.1.2 number of sanctions (administrative and criminal) issued by relevant authorities by 2024	Kallxo reports	64	October 2017-December 2018	20	20	20	20	80	Ibid.
	3.1.3 Number of social media followers, disaggregated by gender, of Kallxo.com	Kallxo reports	166,919 Facebook followers	2018	+10% on the previous year	+10% on the previous year	+10% on the previous year	+10% on the previous year	+40% on 2018	Kallxo.com reports on social media users subscriptions and follows.
	3.1.4 Number of high school female and male students (senior) reached	Project Reports	0	December 2020	At least one high school per municipality	+20% on the previous year	+20% on the previous year	+20% on the previous year	30 high schools	Project reports will indicate the number of high school seniors reached throughout the

during lectures									duration of the project.
3.1.5 Number of Project 0 registered Reports subscribers on the paid subscription platform	Project Reports	0	December 2020	At least one hundred			100	100	Kallxo.com reports

Annex 5: Terms of Reference

Background

The Support to Anti-Corruption Efforts in Kosovo (SAEK III) Project, supports the implementation of a legal and institutional framework in line with international standards with a measurable track record of successfully prosecuted corruption cases and a robust preventive mechanism uncovering alleged conflicts of interest and abuse of authority. The aim is to enable and ensure key suppressive and preventive bodies are maximizing their abilities to detect, investigate, prosecute, adjudicate corruption related offenses as well as confiscate criminal proceeds derived thereof.

SAEK III Project is based on a three-tier approach necessary to achieve tangible and sustainable results in anti-corruption:

- Policy level work to assist in fulfilling technical and legal requirements and demonstrate effective implementation of laws, SDG 16, and strategies and action plans through:

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

Focusing on the implementation 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 effective implementation of the policy and legislative framework will close existing loopholes for corruption and ensure increased integrity and transparency.

- Structural level work to establish a legal and institutional framework for coordinated prosecutorial led joint investigations of financial crime and demonstrable effectiveness in assets recovery so as to effectively sanction crime, remove generated illicit proceeds and increase public pressure to produce results in the fight against corruption, through:

Outcome 2: Anti-corruption institutions detect, repatriate hidden stolen assets and process corruption cases effectively

Focusing on strengthening anti-corruption institutions and providing them with the capacity and tools to effectively detect and suppress corruption. If relevant anti-corruption institutions operate in line with an improved policy and legislative framework and have improved capacities and tools to detect corruption and suppress corruption then these institutions will have the capacities to seize illicit assets and to ensure their repatriation to the public budget.

- Partnerships with CSO's to develop mechanisms for reporting corruption and holding institutions accountable, through:

Outcome 3: Civic engagement mechanisms to hold institutions accountable strengthened

Focusing on the development of 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. If civic engagement mechanisms are established and used through initiatives on corruption reporting, referral and monitoring, and

increased awareness on how corruption is tackled, then public institutions will be influenced to be more accountable to citizens on deterring, sanctioning corruption and transparent in their decision-making processes.

Objective of the Assignment

Conduct a mid-term evaluation of the SAEK III project activities to note progress against indicators, identify possible implementation gaps, and propose corrective actions.

Duties and Responsibilities

The international evaluation specialist will undertake the following duties and responsibilities:

- In close cooperation with the Local Evaluation Specialist, conduct a comprehensive desk review of project-related documents and UNDP evaluation policies and, based on this information, draft and submit an inception report containing the following: a.) the appropriate methodology to be applied during the evaluation; b.) the work plan and any technical instruments to be used during the assignment, while being guided by the set of evaluation questions as presented. Together with the Local Evaluation Specialist conduct on-site field visits, meetings, discussions, and interviews with stakeholders (Kosovo Anti-Corruption Agency, Chief Prosecution, Supreme Court, Ministry of Justice, FIU, Internews Kosova, GAP Institute, ROLAG, etc.) The Evaluation Team is also expected to conduct interviews and meetings with UNDP senior management and Programme, and SAEK III team.
- Draft a mid-term evaluation report based on the agreed methodology, a presentation of findings, presentation of the lessons learned and clear strategic recommendations exploring possible adjustments for the remaining period of project's implementation.

The mid-term evaluation report must include, but not necessarily be limited to, the elements outlined below:

- Title and opening pages
- Table of contents
- List of acronyms and abbreviations
- Executive summary
- Introduction
- Description of the intervention
- Evaluation scope and objectives
- Evaluation methodology
- Data analysis
- Findings and conclusions
- Recommendations
- Lessons learned
- Report annexes

Finalize the mid-term evaluation report, accounting for the UNDP and stakeholders' feedback on the first draft.

Evaluation questions:

RELEVANCE:

- To what extent were lessons learned from other relevant projects considered in the project's design?
- To what extent/Is the project relevant in terms of the needs and potentials/resources of the key stakeholders and beneficiaries? What were the main circumstantial factors taken into account in the project plans and implementation?
- Is sufficient local ownership demonstrated?
- Have there been any changes in policies and strategy development that have affected the project? If yes, have necessary revisions and adaptations been designed?
- To what extent has the project been appropriately responsive to political, legal, economic, institutional, etc., changes in the country?
- What are the areas of relevance for future interventions in the target area?

IMPACT, EFFECTIVENESS, AND EFFICIENCY:

- To what extent Is the project on track to achieve its expected results? What has been achieved?

- How have the synergies between the responsible implementing partners and UNDP contributed to project goals?
- What challenges have been faced? What has been done to address the potential challenges/problems?
- Has the project appropriately reached its target groups? Is the project serving the needs of vulnerable groups, i.e. women, youth, minorities?
- Have the capacity development measures served the needs and demands of the stakeholders? What has been achieved in institutionalizing the acquired knowledge and skills?
- In what ways could the project improve its efforts in the second half of project's implementation toward achieving the expected results and maximizing impact?
- Are the expected results clearly defined, both quantitatively and qualitatively, and are they achievable with the planned approach and resources?
- 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)
- Are the management and administrative arrangements sufficient to ensure efficient implementation of the project?
- How has the project implemented the commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability?
- How has donor coordination impacted the efficiency of implementation and results?

SUSTAINABILITY:

- To what extent do stakeholders support the project's long-term objectives?
- How will the project ensure sustainability of its results and impacts when the project will have ended (i.e. continuity of developed capacities, use of knowledge, improved practices, etc.)?
- Does the project have a concrete and realistic exit strategy to ensure sustainability?
- In case of sustainability risks, are sufficient mitigation measures proposed?

Methodology and Evaluation Ethics

The Evaluation Team may employ any relevant and appropriate quantitative or qualitative methods it deems appropriate to conduct the project mid-term evaluation. Methods should include a desk review of documents; interviews with stakeholders, partners, and beneficiaries; field visits; use of questionnaires or surveys, etc. However, a combination of primary and secondary, as well as qualitative and quantitative data should be used. The Evaluation Team is expected to revise the methodological approach in consultation with key stakeholders as necessary, particularly the intended users and those affected by mid-term evaluation results. The Team should present its findings in both quantitative data and qualitative recommendations. The Evaluation Team is expected to hold interviews and meetings with the relevant staff of UNDP, SAEK III, main Project partners and beneficiaries (Kosovo Anti-Corruption Agency, Prosecution, Supreme Court, Ministry of Justice, FIU, Tax Administration, Internews Kosova, GAP Institute, etc.) The Team will be expected to share the list of interviews to be conducted with UNDP SAEK III beforehand. The suggested methodology should be compatible with the UNDP approach to evaluations as described in the *Handbook for Planning, Monitoring and Evaluation*.

The Evaluation Team is expected to use its findings and expertise to identify the lessons learned, and to propose recommendations for improving the project's future efforts toward achieving the expected results. Prior to the Evaluation Team's arrival, it will receive a list of documents to be consulted for its review. The Team will have latitude to design a detailed evaluation scope and methodology and will present a proposed work plan as part of the inception report to UNDP before arrival to Kosovo in order to optimize the time spent during the field mission.

The mid-term evaluation will be conducted in accordance with the principles outlined in the UNED *Ethical Guidelines for Evaluation*. The Evaluation Team must address any critical issues in the design and implementation of the evaluation, including evaluation ethics and procedures to safeguard the rights and confidentiality of information providers.

Deliverables/Outputs

- Methodology to be applied during the mid-term evaluation, as well as the work plan and technical instruments to be used during the course of the assignment is drafted, submitted, and endorsed by UNDP (estimated date of completion 06 May 2022)
- Field visits, meetings and interviews in Kosovo are conducted, gathering data to be used in the mid-term evaluation report (estimated date of completion 13 May 2022)
- Draft and submit mid-term Evaluation report with the methodology applied, a presentation of findings, a presentation of the lessons learned and clear strategic recommendations to the UNDP and its partners suggesting possible adjustments for the remaining period of project's implementation is formulated, based on the findings acquired during the field mission to Kosovo and through the relevant project documentation, jointly with the Local Evaluation Specialist (estimated date of completion 27 May 2022)
- A mid-term Final Evaluation report accounting for the UNDP and stakeholders' feedback on the first draft is produced and validated by UNDP (estimated date of completion 10 June 2022)

Annex 6: Agreement to abide by the Code of Conduct for Evaluation in the UN System

Name of Consultant: Krenar Loshi

Name of Consultancy Organisation (where relevant):

I confirm that I have received and understood and will abide by the United Nations Code of Conduct for Evaluation.

Signed in London on 23 May 2022

Signature: (submitted to UNDP)

Name of Consultant: Mytaher Haskuka

Name of Consultancy Organisation (where relevant):

I confirm that I have received and understood and will abide by the United Nations Code of Conduct for Evaluation.

Signed in Prishtina on 23 May 2022

Signature: (submitted to UNDP)