Final Report

FINAL EVALUATION

Support to Anti-Corruption Efforts in Kosovo (SAEK) Phase III

Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Agency for Development and Cooperation SDC

Sweden
Sverige

PROJECT PROFILE

Project Identification	
Project Title:	Support to Anti-Corruption Efforts in Kosovo[1] (SAEK) Project – Phase III
Project ID:	Atlas: 00122188, Quantum: 00122188
Linkages to UNDP Strategic Plan 2022 – 2025 and UNDP RRF for Kosovo	
UNDP Strategic Plan	**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
UNDP Results and Resources Framework for Kosovo	**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
Project Outcome/s	**Outcome 1: Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced** **Outcome 2:** Anti-corruption institutions detect, repatriate hidden stolen assets and process corruption cases effectively **Outcome 3:** Civic engagement mechanisms to hold institutions accountable strengthened
Project Outputs	**Output 1.1** Policy and legal anti-corruption framework implemented in gender sensitive manner **Output 1.2**: AC strategy 2020-2024 effectively implemented in gender sensitive manner **Output 1.**3 Anti-corruption Strategy and Action 2024-2028 developed in gender sensitive manner **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 focus on vulnerable women and marginalised groups **Output 3.1** Public institutions are more responsive and effective in resolving cases of corruption brought forth by the public through CSO
Project Information	

Project Duration:	**Start Date:** 1 July 2020	**End Date:** 30 June 2024
Region	Western Balkans	
Country/territory	Kosovo[2]	
Project Budget		
Project budget	Swiss Agency for Development and Cooperation (SDC): 2.25 million EUR	

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[1] All references to Kosovo shall be understood to be in the context of Security Council resolution 1244 (1999).

	Swedish Agency for International Development and Cooperation (Sida): 2.25 million EUR Total Budget: 4.5 million EUR
Project expenditure as at time of evaluation	3,645,000 ERU as of 31/3/2024
Evaluation Details	
Evaluation Type	Final Project Evaluation
Evaluation coverage	1ˢᵗ May 2024 – 30ᵗʰ June 2024
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The evaluation team would like to thank all the partners who participated in the evaluation, including representatives from the government of Kosovo and the state institutions responsible for preventing and combatting corruption. In addition, the evaluation would also like to thank the responsible parties and CSO representatives who participated in key informant interviews and group discussions. Al stakeholders' openness and willingness to share information were critical in providing a comprehensive assessment of the project's impact and effectiveness.

Thanks is also extended to Valbona Bogujevci for her continuous support through the evaluation process in her role as Evaluation Manager, and for her kind review and quality assurance of the evaluation deliverables.

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ABBREVIATIONS

AMSCA	The Agency for the Management of Confiscated and Seized Assets
APC	The Agency for Prevention of Corruption
ARO	Asset Recovery Office
AWP	Annual Work Plan
CEC	Central Election Commission
CSO	Civil Society Organisation
ERG	Evaluation Reference Group
FE	Final Evaluation
FIU	Finance Intelligence Unit
GD	Group Discussion
GE	Gender Equality
HMRC	His Majesty's Revenue & Customs
HR	Human Rights
HRBA	Human Rights Based Approach
IR	Inception Report
KII	Key Informant Interview
KJA	Kosovo Justice Academy
KJC	Kosovo Judicial Council
KP	Kosovo Police
M&E	Monitoring & Evaluation
OCSP	The Office of Chief State Prosecutor
OECD DAC	Organisation for Economic Co-operation and Development/Development Assistance Committee
OSCE	Organization for Security and Co-operation in Europe
PEP	Politically Exposed Person
MoJ	Ministry of Justice
ROLAG	Rule of Law Advisory Group
SAEK	Support to Anti-Corruption Efforts in Kosovo
SC	Supreme Court
SDC	Swiss Agency for Development and Cooperation
SDG	Sustainable Development Goal
Sida	Swedish International Development Agency
SPRK	The Special Prosecution of the Republic of Kosovo
TAK	Tax Administration of Kosovo
ToC	Theory of Change
ToR	Terms of Reference
ToT	Training of Trainers
UN	United Nations
UNDP	United Nations Development Programme
UNEG	United Nations Evaluation Group

Executive Summary

This Evaluation Report relates to the Final Evaluation (FE) of the Support to Anti-Corruption Efforts in Kosovo (SAEK) Project – Phase III. The project is implemented by the United Nations Development Programme (UNDP) Kosovo. The evaluation was commissioned by the project at the end of its implementation phase and covers all four years of the project's implementation from 1 July 2020 – 30 June 2024.

As per the OECD/DAC Evaluation Criteria,[3] the FE aims to provide UNDP, the project's donors, government counterparts, civil society partners and other stakeholders with an impartial assessment of the results generated to date. The evaluation assesses the Project's relevance, effectiveness, efficiency, impact and sustainability as well as cross-cutting issues; identifies and documents evidence-based findings; and provides stakeholders with recommendations to inform the design and implementation of any future anti-corruption interventions in Kosovo.

The evaluation is based on data available at the time of the evaluation, including project documents and regular progress report and other relevant reports, as well as comprehensive in-person and online stakeholder consultations conducted during May 2024. The primary evaluation users, namely UNDP Kosovo, will use the evaluation to understand the progress of the project to date and further strategize for promoting anti-corruption efforts in Kosovo. The secondary users, namely the project's partners, will use the information to learn about what works and what does not when promoting anti-corruption efforts in Kosovo. The project's donors, the Swiss Agency for Development and Cooperation (SDC) and the Swedish International Development Agency (Sida) may use the evaluation for accountability and as input for decision-making purposes.

The methodology used a mixed-methods approach but was essentially qualitative. It comprised an analysis of all relevant project documentation shared by the project – 28 documents in total, and data collected both in-person and virtually through a total of 26 key informant interviews and group discussions. A total of 40 partners and stakeholders were met (13 women (33%) and 27 men (66%)) including representatives from the government and state institutions; implementing partners; civil society organisations; the project's donors; external partners and UNDP project and programme representatives and senior management.

The evaluation finds that the project is without doubt contributing to its goal of strengthening the legal and strategic framework for anti-corruption, and building capacities in a responsive manner, to reduce corruption and recover stolen assets. At the end of this third phase of SAEK project implementation, the project has achieved significant and impressive results. It has skilfully adopted a number of different approaches, including strengthening the normative framework relating to anti-corruption; strengthening the capacities of the state institutions to prevent and respond to corruption; as well as empowering the citizens of Kosovo through raising their awareness of corruption and how and where to report it.

The project was designed in a highly participatory and consultative manner, ensuring a high degree of stakeholder buy-in and national ownership as well as that the project was needs based and nationally driven. Most key anti-corruption related legislation is now in place and crucially, the

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[3] https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm

project has provided the institutions with the tools to implement the legislation, as well as civil society organisations with the tools and capacities to monitor the implementation of the legislation and hold the institutions to account. This has included a number of digital solutions, which when fully operationalised will significantly contribute towards enhancing the transparency and accountability of Kosovo's anti-corruption institutions. The KALLXO.com initiative has proven instrumental in increasing the awareness and engagement of citizens and offers a replicable model for strengthening civic engagement mechanisms in anti-corruption processes.

The project has been able to offer world-class expertise to Kosovo's anti-corruption institutions, as reflected in the capacities of the project team, as well as in the external expertise that the project was able to offer. All team members have extensive anti-corruption expertise, which is highly regarded and valued by the project partners as well as by external partners. Many of the project's staff are long-standing, providing the project with robust institutional knowledge as well as allowing the team to cultivate strong partnerships based on trust. This, combined with the neutrality of the UN and its convening power, has helped to position UNDP as the key anti-corruption partners for institutions and communities in Kosovo.

While sustainability has not yet been fully realised across all of the project's results, sustainability prospects are assessed as high, not least in terms of the level of national ownership. Changes in behaviour and mindsets, both within the institutions themselves, as well as among citizens are starting to be seen. Going forward into the no-cost extension of the project until 31 December 2024, it is imperative that the project develop a clearly defined Exit Plan and Sustainability Strategy, in order to reinforce and fully embed the results that have been achieved to date. Beyond the end of the project implementation, there are a number of key areas where the project should seek to provide additional support in order to ensure the full sustainability of its results.

This evaluation report provides a set of 13 findings, six conclusions, five recommendations and fourteen lessons learned. A summary of the key findings and recommendations are provided below. Chapter 1 provides the introduction; Chapter 2 the description of the project; Chapter 3 the methodology for conducting the evaluation; Chapter 4 the analytical framework; Chapter 5 contains the main analysis and findings of the evaluation; Chapter 6 provides the conclusions and assessment against the evaluation criteria; Chapter 7 recommendations and Chapter 8 the lessons learned.

Relevance

Finding 1: The project is highly relevant to the national development priorities of Kosovo, as reflected in its National Development Strategy 2030 and its Rule of Law Strategy 2021 - 2026. It also contributes towards Kosovo's EU aspirations, as reflected in Chapter 23 of the EU Acquis. It is well aligned with and contributes towards the development priorities of its donors, Switzerland and Sweden. Further, it tessellates with UN and UNDP's national, regional and global priorities, including the UN's Common Development Plan for Kosovo and UNDP's Strategic Plan 2022 - 2025. Moreover, the project convincingly contributes towards Kosovo's progress towards achievement of the 2030 Agenda and the Sustainable Development Goals, notably SDG 16, targets 5 and 6.

Finding 2: The project is highly relevant to its stakeholders – the anti-corruption institutions in Kosovo. The project design process was inclusive and participatory allowing the project to be tailored to their needs and the needs of the people of Kosovo in general, as well as being nationally driven. The project is able to offer practical solutions based on the needs of the institutions, using international standards and best practices, tailored to the Kosovo reality. The project design was informed by the previous two phases of SAEK, providing it with a strong evidence-base for the design of the project's activities. The project has been able to respond well to external challenges influencing its operational context, including the COVID-19 pandemic as well as internal political changes and the external geopolitical realities in the region.

Finding 3: The project's Theory of Change was grounded in thorough research and analysis and was evidence based and demand driven. It was underpinned by a solid risk assessment and sound assumptions, which remained relevant throughout its implementation. Building on the foundations laid in SAEK I and II, the project used a human rights-based approach, to further strengthen the normative framework, institutional capacities and the public's awareness of and engagement in anti-corruption processes in Kosovo. This enabled the project to work both vertically and horizontally – working with the executive at central and municipal level, the judiciary and with citizens. Through these approaches, the project has been able to skilfully position itself as the key anti-corruption partner for both institutions and communities in Kosovo. More qualitative indicators in the project's results framework would allow it to better capture its contribution towards higher level results.

Effectiveness

Finding 4: The project's approaches have contributed to its effectiveness. The project has provided a high-level of technical expertise to strengthen the normative framework on anti-corruption, including through supporting the development of 22 key primary and secondary legislation and policies. This has provided the basis for fighting corruption in Kosovo, providing the institutions with the correct mandates and facilitating the introduction of institutional mechanisms to enable the institutions to work together in a coherent and coordinated manner. Overall, the project has ensured that all key anti-corruption primary legislation is in place that complies with the United Nations Convention Against Corruption and other international standards. The neutrality of the UN in providing exposure to international standards has built trust between the project and its stakeholders and contributed to the achievement of results. Embedding technical experts into anti-corruption institutions has been a key driver of results.

Finding 5: The project's capacity development approaches and convening power have strengthened Kosovo's anti-corruption institutions and provided them with capacity and tools to effectively detect and suppress corruption. Key successes have included the establishment of the Assets Recovery Office (ARO), the upgrading of the Strategic Analysis Division within the FIU, strengthening the capacities of institutions to issue corruption charges and increasing the awareness of citizens on their rights and responsibilities on public transparency and accountability. There is evidence that the project has contributed to the transformation of how Kosovo institutions approach anti-corruption as well as citizen's understanding of transparency and accountability.

Finding 6: The project has considerably raised both the awareness and engagement of citizens in the fight against corruption. This has included an increased awareness of what corruption is and how it is tackled, as well as through initiatives to report, refer and monitor corruption. The KALLXO.com initiative, introduced through SAEK I, has proven instrumental in this process and offers a replicable model for strengthening civic engagement mechanisms in anti-corruption processes.

Digitalisation

Finding 7: The project has skilfully developed a number of digital solutions as key tools for enhancing the transparency and accountability of anti-corruption institutions in Kosovo. It has provided capacity development support to ensure that the institutions are capacitated to take over the operation and maintenance of these platforms and tools. However, a number of these tools have yet to be operationalized and it is too premature to assess their longer-term impact.

Efficiency

Finding 8: The project has been implemented in a lean and cost-efficient manner, offering good value for money for the results it has achieved and its anticipated future results, through identifying low cost – high impact measures combined with the long-term approach of both the project and its donors. Through forging strong partnerships with its responsible parties, the project's activities have been implemented efficiently. The world class expertise that the team is able to offer, both within the team itself and the external expertise it can bring in to the project, is highly regarded.

Finding 9: The project developed a robust monitoring framework to ensure that activities remained on-track and to course correct where necessary. The project board meetings have proved a useful forum for coordination, to raise understanding and to achieve better results. Despite delays caused to the implementation of the project, the project's delivery rate has increased since the end of the COVID-19 pandemic and in 2023 reached an impressive 94%. In terms of its achievement against indicators, the project has met or over exceeded 15/23 of its indicators, however the project's results framework does not always allow for the capturing of all of the project's qualitative results. Lessons learned could be better captured and shared more broadly.

Impact

Finding 10: SAEK III has had a profound impact on reducing corruption and enhancing transparency across various levels of society and governance. The project has had a significant and multifaceted impact on Kosovo's efforts to combat corruption, affecting a broad spectrum of society and governance. The project's comprehensive approach, combining policy support with practical tools and expert technical assistance, has laid a strong foundation for sustained anti-corruption measures in Kosovo.

Sustainability

Finding 11: The project was designed with the sustainability of results in mind, although these were not captured in a defined Sustainability or Exit Strategy. While sustainability has not yet been fully realised across all project interventions, there are strong indications that point towards sustainability prospects and there is a visible shift towards nationally-driven results. National ownership of both the project and its results is assessed as very high. However, there is a need to continue to reinforce the sustainability of the project's results and ensure that the results gained are not lost going forward.

Stakeholders and Partnership Strategy

Finding 12: The project has established strong partnerships both with its implementing partners as well as with other development partners working on anti-corruption efforts in Kosovo. This has allowed it to convene stakeholders to ensure the implementation of the project and to achieve results. The engagement of specialist partners positively affected the efficiency of the project implementation and results. The project has driven coordination with external partners, ensuring that there was no overlap or duplication, while also allowing it to identify synergies and complementarities where possible. The project has had regular communication with its donors, although it could have relied more on its donors to provide political support on sensitive issues when needed, through more frank communication.

Cross-cutting themes - Human Rights and Gender

Finding 13: While the project was designated as GEN 1, meaning it has no dedicated budget or activities allocated towards gender or inclusion, it made considerable efforts to mainstream gender and inclusion across all of its activities, achieving solid results in terms of gender equality and women empowerment. The project made concerted efforts to be inclusive, despite the constraints of the political context.

Recommendations

Recommendation 1 The project should develop an Exit Strategy and Sustainability Plan that clearly defines the steps and processes required to embed the project results in both the remaining no-cost extension phase as well as going forward. This should be done as soon as possible. This should feed into the development of follow-on projects and a Resource Mobilisation Strategy to ensure the sustainability of project results.

Recommendation 2 The project should codify and share all knowledge gained and lessons learned throughout the three phases of SAEK implementation. Going forward, standardised mechanisms for learning, should be introduced, which would ensure that all knowledge, evidence and lessons learned gained are captured and fully institutionalised. Consideration could also be given to creating a knowledge hub that would contribute to UNDP's Global Portal on Anti-Corruption for Development.[4]

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[4] https://anti-corruption.org

Recommendation 3 Given the huge number of results that have been achieved by the SAEK project, consideration should be given to undertaking an Impact Assessment. Not only would this assist the project in capturing and showcasing all of its results, but it could also be used to inform future programming and as a basis for resource mobilisation efforts. Qualitative indicators, which can capture behavioural and attitudinal change should be integrated into the Impact Assessment as well as into the Results Frameworks of any future programming in this area.

Recommendation 4 The project has already attracted government cost-sharing with the Ministry of Justice. Opportunities for additional cost-sharing should be explored with the government and anti-corruption institutions in Kosovo. This will evidence the commitment of the Government of Kosovo to strengthening its corruption framework and will likely strengthen resource mobilisation efforts.

Recommendation 5 In order to reinforce the sustainability of the project results and informed by the Exit Plan and Sustainability Strategy recommended in Recommendation 1, the project should identify areas that need further reinforcement to really embed SAEK III's results into the system.

FINAL EVALUATION
SUPPORT TO ANTI-CORRUPTION EFFORTS IN KOSOVO (SAEK) PHASE III PROJECT

1. Introduction

This Evaluation Report relates to the Final Evaluation (FE) of the Support to Anti-Corruption Efforts in Kosovo (SAEK) Project – Phase III. The project is implemented by the United Nations Development Programme (UNDP) Kosovo. The evaluation was commissioned by the project at the end of its implementation phase and covers all four years of the project's implementation from 1 July 2020 – 30 June 2024.

As per the OECD/DAC Evaluation Criteria,[5] the FE aims to provide UNDP, the project's donors, government counterparts, civil society partners and other stakeholders with an impartial assessment of the results generated to date. The evaluation assesses the Project's relevance, effectiveness, efficiency, impact and sustainability as well as cross-cutting issues; identifies and documents evidence-based findings; and provides stakeholders with recommendations to inform the design and implementation of future interventions.

The intended users of the evaluation include primary evaluation users, namely UNDP Kosovo, who will use the evaluation to understand the progress of the project to date and further strategize for promoting anti-corruption efforts in Kosovo. The secondary users, namely the project's partners, will use the information to learn about what works and what does not when promoting anti-corruption efforts in Kosovo. The project's donors, the Swiss Agency for Development and Cooperation (SDC) and the Swedish International Development Agency (Sida) may use the evaluation for accountability and as input for decision-making purposes. Overall, all users can use the evaluation for accountability and transparency purposes, to hold UNDP accountable for its development contributions. The evaluation team sought to ensure the full and active participation of all users as relevant throughout the evaluation process.

The Evaluation Report is structured as per the UNDP Evaluation Guidelines[6] as follows:

Chapter 2 presents the description of the intervention, including the context and background as well as the project itself. Chapter 3 provides the evaluations' objective, scope and purpose as well as the evaluation approach, methods and data analysis approaches utilised as part of the evaluation process. Chapter 4 presents the analytical framework, Chapter 5 the findings, Chapter 6 the conclusions, Chapter 7 the recommendations and Chapter 8 the lessons learnt.

There are a number of annexes to the Evaluation Report, including the key evaluation questions, evaluation matrix, informed consent protocol and data collection tools and instruments, the stakeholder list, the list of sources consulted, the Terms of Reference (ToR) and the signed Pledge of Ethical Conduct.

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[5] https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm
[6] http://web.undp.org/evaluation/guideline/documents/PDF/UNDP_Evaluation_Guidelines.pdf

2. Description of the intervention

2.1 Context

The endemic corruption within Kosovo remains a significant barrier to its social and economic development. Despite numerous interventions and legal frameworks established to combat corruption, it persists across all sectors and levels of administration. High-profile cases often result in acquittals, and successful prosecutions generally lead to minimal sentences, allowing offenders to retain their positions and the proceeds obtained through corrupt practices. This entrenched corruption is further exacerbated by a prevalent culture of impunity among high officials and widespread nepotism, which undermines public trust in the delivery of services

Challenges and Achievements

In 2018, Kosovo's struggle with corruption was notably evident, reflected by a score of 35/100 on Transparency International's Corruption Perceptions Index (CPI), placing it marginally above the average for Eastern Europe and Central Asia. This score highlighted the urgent need for enhanced legislative implementation and strengthened capabilities to effectively combat corruption, including to the identification and repatriation of stolen assets. Moreover, the presence of multiple institutions with overlapping mandates made coordinating investigations and prosecutions particularly challenging, underscoring the necessity for a more streamlined approach.

By recent assessments, Kosovo has shown marked improvement in its anti-corruption efforts, where in 2023 it ranked 83rd globally with a score of 41 on the CPI.[7] This shows that the country has made significant strides in terms of legislative reforms and strengthening institutional frameworks. However, a critical challenge remains: these enhancements have not yet translated into effective convictions, especially in high-profile cases involving top officials. This discrepancy highlights the ongoing need for focused efforts to ensure that legal and institutional advances lead to tangible outcomes in the fight against corruption.

Legal and Institutional Framework

The legal and institutional frameworks in Kosovo are largely aligned with international standards, yet notable gaps and jurisdictional overlaps persist. The low number of corruption-related cases compared to the overall criminal cases processed by the courts, do not necessarily show a low level of corruption but rather inefficiency in combating corruption. In addition, public perception of large-scale corruption being present in public and international institutions in Kosovo has been increasing.[8] This discrepancy underscores the importance of improving detection, prosecution and adjudication processes.

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[7] https://www.transparency.org/en/countries/kosovo

[8] In November 2023, 5.2% of respondents claimed they perceived large-scale corruption to be present in public and international institutions in Kosovo as compared to 23.5% in April 2023 and 21.1% in November 2022. Significant shifts in public perceptions of large-scale corruption have been noted in various institutions. The perception of corruption within the Kosovo Police has risen markedly, from 7.3% in April 2023 to 17.9%. Conversely, perceptions of corruption in Municipalities have also increased, from 15.8% in April 2023 to 21.7%. On a more positive note, the perception of corruption in the Courts has seen a notable decrease, dropping from 37.7% in April 2023 to 28.8%. Source: UNDP 2023. Public Pulse Brief XXV.

Political and Public Response
The October 2019 elections marked a pivotal moment, reflecting a resounding public demand for change. Voters significantly supported parties with strong anti-corruption stances, indicating a shift towards greater accountability and transparency in governance. The new political landscape offered a promising foundation for advancing anti-corruption efforts, supported by an increasingly mature electorate that demands higher standards of integrity from its leaders.

2.2 Background to the project

It was against this backdrop that SAEK III was developed. The SAEK III project's focus was to support the implementation of new anti-corruption legislation and move toward the end goal of repatriation of stolen assets and completing a robust corruption prevention system. The project supported core governance functions, promoted effective service provision, rule of law, anti-corruption capacities and access to justice, targeting barriers and vulnerabilities that kept people in poverty. It complemented the parallel efforts of partners to this project to maximize the impact of its work in the area of gender equity, human rights and environment protection. Inclusive and accountable governance systems and processes were recognized as crucial to sustainable development and human security.

Through a three-tier approach, SAEK III supported the policy, structural and capacity level, towards achieving the following sustainable results:

- Fulfilment of technical and legal requirements for the effective implementation of anti-corruption laws and strategies such as anti-money laundering, anti-corruption, and related action plans.
- Establishment of a legal and institutional framework for coordinated prosecutor-led joint investigations of financial crime; improved effectiveness in asset recovery; enhanced investigative journalism and coordination among public institutions at the central and local levels; further strengthening of Kallxo.com online platform for reporting corruption allegations.
- Provision of training for investigators on asset recovery and establishment of an asset recovery structure mandated to track down stolen assets and conduct thorough financial crime investigations.

The project provided expert support to the authorities in drafting policy documents, including national strategies and action plans, legislation, and guidance notes on conducting investigations, vetting procedures,[9] conflict of interest recusal procedures, judicial oversight mechanisms and other anti-corruption mechanisms and instruments, building upon interventions and novelties introduced throughout SAEK I and SAEK II.

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[9] As part of SAEK's legal and technical advice on anti-corruption procedures the project provided advice on vetting for three issues. In terms of political party financing SAEK supported the drafting of the primary and secondary legislation for the vetting of auditors to conduct independent auditing of financial records; for the Bureau for the Verification of Unexplained Wealth SAEK included vetting procedures for the Director and all staff; and through the embedded expert in the MoJ SAEK provided legal drafting advice to the Law on Vetting, specifically in regard to international standards and adherence to the Venice Commission opinion.

To ensure adequate expertise and successful progress within the project's goals related to transparency and accountability, the project partnered with several responsible partners/organizations:

- Basel Institute International Centre for Asset Recovery (ICAR) as the world leader in asset recovery training with an exceptionally successful record in supporting national investigators in tracking down stolen assets hidden abroad through case work assistance to support the Kosovo authorities on bolster case work and help repatriate assets based on intelligence gathering, prosecution strategies, and asset tracing for complex corruption and money laundering cases.
- Rule of Law Advisory Group (RoLAG) to support the Anti-corruption and Asset Recovery Policy Support Service that would contain a repository of documents regarding national and international anti-corruption strategies, policies, legislation and procedures which could be accessed by public officials, as well as serve as the locally supported central body for anti-corruption and asset recovery policy-making and continuous training.
- Kallxo.com platform to perform its invaluable role of receiving reports from citizens about alleged corruption, wrongdoings and mismanagement of public funds.
- GAP Institute to contribute to increased transparency in government spending and revenues, as well as to develop comparison and evaluation studies of various approaches for the administration of confiscated illicit wealth from the 4 budgetary perspectives.

The main Project Partner(s) over the implementation years included: SDC and Sida, as project's donors, Agency for Prevention of Corruption, Prosecution, Supreme Court, Ministry of Justice, Finance Intelligence Unit, Central Election Commission, Academy of Justice, FOL Movement, and Kosovo Tax Administration.

The project commenced implementation on 1 July 2020 and is due to be finalised as of 30 June 2024, with a six-month non-cost extension to complete started activities, monitor results, and ensure sustainability of such results, until 31 December 2024. It has been funded by the SDC and Sida and had a total budget of 4.5 million Euro.

2.3 Evaluation purpose, objective and scope

The ToR provides the overall framework for the evaluation, including the purpose, objective and scope of the evaluation, which the evaluation team has analysed to develop the specific methodology for conducting the evaluation.

As per the OECD DAC Evaluation Criteria,[10] the FE provides UNDP, the donors, government counterparts, civil society partners and other stakeholders with an impartial assessment of the results generated to date. The evaluation assessed the Project's relevance, effectiveness, efficiency, impact and sustainability. It identified and documented evidence-based findings, and provides stakeholders with actionable recommendations and elaborated lessons learned to inform the design and implementation of future interventions of a similar nature.

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[10] https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm

The evaluation took a specific overview of the projects' implemented activities, by gathering perceptions, aspirations, feedback and data from relevant partners, stakeholders and beneficiaries for objective analysis and conduct of the evaluation. The evaluation underlines the key factors that have either facilitated or impeded project implementation.

The FE covered the project period from 1 July 2020 to 30 April 2024 evaluating all project activities and all target groups. It covered conceptualisation, design, implementation, monitoring, evaluation, and reporting of results in consultation with all project stakeholders. The FE also considered any additional results that are anticipated to be achieved by the project's end date of 30 June 2024.

2.4. Theory of Change

The Theory of Change (ToC) for the project built on and contributed to the 2030 Agenda and the Sustainable Development Goals (SDGs) in particular, 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* and its corresponding targets 5 - *Substantially reduce corruption and bribery in all their forms* and 6 - *Develop effective, accountable and inclusive institutions at all levels*.

The overall ToC for the project, as detailed in its project document, was that *if the legal and strategic framework is in place, and capacities to implement them in a responsive manner, then corruption will be reduced, and stolen assets will be recovered.*

This was to be achieved through three expected outcomes:

Outcome 1: Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced
The **first outcome** focused 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 **outcome 1 theory of change** was that *if selected institutions are supported in implementing policies, legislation, plans and strategies in line with international standards on anti-corruption, then anti-corruption institutions will demonstrate an increased compliance with principles of integrity, transparency and improved capacities to suppress corruption. The effective implementation of the policy and legislative framework in gender and inclusive manner **will** close existing loopholes for corruption and ensure increased integrity and transparency.*
Output 1.1 - Policy and legal anti-corruption framework implemented in gender sensitive manner
Output 1.2 - AC 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** focused on strengthening anti-corruption institutions and providing them with the capacity and tools to effectively detect and suppress corruption. The **outcome 2 theory of change** was that *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.*

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** focused on the development of civic engagement mechanisms through initiatives on corruption reporting, referral and monitoring, resulting in increased capacities to hold public institutions accountable and awareness on how corruption is tackled. The **outcome 3 theory of change** was that *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.*

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

The ToC was also visualised in the project document and detailed underlying and root causes. The ToC was underpinned by the assumption that the four main project partners represented on the project board (Supreme Court, the Office of the Chief Prosecutor, the Anti-corruption Agency,[11] the Financial Intelligence Unit) must continue to play vital roles in combatting corruption with impartiality, professionalism and must strive to build capacities and undergo restructuring so as to enhance their results in preventing and suppressing corruption.

In addition to the well elaborated ToC, which charted the causal pathway foreseen to achieving results, the project's results framework contained the three outcome statements and seven output statements, together with their corresponding indicators. Each of the outcomes had one corresponding indicator, while there were 20 output indicators spread across the seven output areas. This totalled 23 indicators through which the progress of the project was monitored and measured.

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[11] As per Law no. 08/L-017, supported by SAEK III and passed on July 1st, 2022, the Anti-corruption Agency was transformed into The Agency for Prevention of Corruption.

3. Methodology

The main reference for the evaluation methodology was the OECD DAC Evaluation Criteria[12] as well as the UN Evaluation Group (UNEG) Norms and Standards.[13] The evaluation also adhered to the UNEG Guidance on Integrating Human Rights and Gender Equality in Evaluation and UNDP's updated Evaluation Guidelines (2021).[14] Furthermore, the evaluation was designed to be gender-responsive, followed a human-rights based approach, and reflected a utilisation-focused approach. These approaches are elaborated further below. The evaluation was both summative in terms of analysing the results of the project implementation as well as formative in terms of providing forward-looking and actionable recommendations to guide any future programming in this area.

3.1 Evaluability Analysis

The evaluation team undertook a rapid evaluability assessment, looking at the project's ToC together with its results and resources framework and the available project documentation. The evaluation team assessed that the ToC and Results Framework were clear, with clearly and appropriately worded outcome and output statements, together with well-articulated indicators, baselines and targets. The contribution of the outputs towards higher level results contained in the United Nations Kosovo Team Common Development Plan, UNDP Strategic Plan 2022 – 2025, the 2030 Agenda and the SDGs, the National Development Strategy of Kosovo 2016 – 2021 and 2030, the Anti-Corruption Strategy for Kosovo 2020 – 2024, as well as SDC's Strategy for Cooperation and Sweden's Strategy for Reform Cooperation in Eastern Europe, the Western Balkans and Turkey were all clear. All relevant project documentation have been shared with the evaluation team. Regular annual progress reports were comprehensive and available for all years and contained relevant and updated data, which were disaggregated where appropriate. In addition, the evaluation team had been provided with Project Board Meeting minutes, relevant financial reports, and the mid-term evaluation report. (Annex IV shows the full list of reviewed documents.) Overall, this meant that from documentary sources alone, triangulation was potentially possible. The conclusion from the evaluability analysis was that the evaluability of the project was very good.

3.2 Cross-cutting Themes – Human Rights, Gender and Digitalisation

In addition to the OECD DAC evaluation criteria, the evaluation team was asked to analyse three cross-cutting themes – human rights, gender and digitalisation. To respond to this and as per the UNEG Guidance on Integrating Human Rights and Gender Equality in Evaluation, gender equality and the human rights-based approach (HRBA) aspects were integrated into both the evaluation scope and methodology and incorporated into the evaluation matrix (Annex I) and evaluation questions (Annex II). This allowed the evaluation team to assess how the project contributed towards gender equality and diversity and inclusion, for example through affecting gender and power relations and structural causes of inequalities. The evaluation also analysed how the project had affected men and women differently. In addition to being participatory and inclusive, the evaluation team's approach was based on the principles of gender equality. All data gathered were

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[12] Organisation for Economic Cooperation and Development / Development Assistance Committee (OECD/DAC), Network on Development Evaluation, Better Criteria for Better Evaluation Revised Evaluation Criteria Definitions and Principles for Use, 2019, available at: https://www.oecd.org/dac/evaluation/revised-evaluation-criteria-dec-2019.pdf

[13] http://www.unevaluation.org/document/download/2787

[14] http://web.undp.org/evaluation/guideline/documents/PDF/UNDP_Evaluation_Guidelines.pdf

disaggregated to the largest extent possible (gender, age etc.) and efforts were made for positive sampling in terms of ensuring a minimum of 40% women representation during the key informant interviews (KIIs) and group discussions (GDs). However, due to the low representation of women in Kosovo institutions, this was not possible and the evaluation reached a total off 33% women. To the extent possible, the evaluation team assessed gender equality and the human rights-based approach using an intersectionality lens, looking at gender, age, disability status and other intersectional elements that might be relevant.

The evaluation team adopted a two-pronged approach towards gender equality and the HRBA as a means of analysing the cross-cutting themes.

The first ensured that the evaluation was gender responsive and efforts were made to promote:
- **Gender Equality and Human Rights (GE/HR)** throughout the evaluation scope of analysis and the evaluation criteria. This ensured that questions were designed to be gender responsive and that GE/HR – i.e. intersectionality-related data were collected at all stages of the evaluation.
- **A gender responsive methodology** to ensure appropriate methods and tools that reflected gender and inclusion sensitivity. This promoted the employment of a mixed methods approach and the collection of disaggregated data. It also guaranteed that a wide range of data sources and processes were employed, as well as a wide range of stakeholders interviewed, in order to promote diversity, inclusion and representation of all relevant groups in the evaluation. To further support this, data collection was conducted during working hours to accommodate the schedules of all participants, particularly aiming to ensure full participation from those with caregiving or other domestic responsibilities, enhancing the gender-sensitive nature of the data gathering process.
- **Evaluation findings, conclusions and recommendations reflect a gender and HR analysis**: The evaluation analysed the effects of the project on human rights and gender equality and ensured that findings included triangulated data and, where possible, disaggregated data.

The second was to ascertain the extent to which the project and its results were gender responsive. This entailed a detailed examination of the following:

- The overall design of the SAEK III project and the extent to which it ensured that the needs of women, in all their diversity, were considered. This included intersectional factors such as ethnicity, disability status, sexual orientation etc.
- The implementation of the SAEK III project and the extent that it ensured gender sensitivity and HRBA in its activities and the promotion of gender equality and HR both from a project management perspective as well as performance.

For digitalisation, the evaluation team assessed the extent to which the project introduced digital solutions as part of its work; whether the applied digital solutions had the desired effect and any unintended (positive or negative) effects; and the capacities of the responsible institutions for taking over responsibility for the maintenance of the digital solutions.

3.3 Evaluation criteria and elaboration of key questions

As per the ToR, the evaluation team was asked to consider a number of key questions shaped around the OECD DAC evaluation criteria and the additional cross-cutting themes. The key evaluation questions and sub-questions (see Annex I) were synthesized into an evaluation matrix (see Annex II), which guided the evaluation team and provided an analytical framework for conducting the evaluation. The evaluation matrix set out the relevant evaluation criteria, key questions and sub-questions, data sources, data collection methods/tools, indicators/success standards and methods for data analysis. The evaluation matrix was divided into each of the evaluation criteria – relevance, effectiveness, efficiency, impact and sustainability, with the addition of the cross-cutting themes mainstreamed throughout. Within the effectiveness criteria, each of the project's three outcomes were individually scrutinised.

3.4. Evaluation Design

3.4.1. Overall Approach

The evaluation was multi-faceted and the methodological approach used mixed (qualitative and quantitative) methods, as the best vehicle for meeting the evaluation's needs. The evaluation team ensured that the evaluation was conducted through a participatory and consultative process, which included all relevant national stakeholders and the project beneficiaries. The methodological approach promoted inclusion and participation by employing gender equality and human rights responsive approaches, as detailed above under section 3.2, including a utilisation-focused approach. These approaches and how they were incorporated into both the design of the evaluation and its conduct are detailed below:

(i) Utilisation Focused Approach[15]

The evaluation team adopted a utilisation-focused approach that promoted the usage of the evaluation report and sought to enhance learning among all stakeholders. There was a strong focus on the participation of the users of the evaluation report throughout the evaluation process. The intended users of the evaluation included primary evaluation users, namely UNDP Kosovo, who can use the evaluation to further strategize for strengthened anti-corruption efforts in Kosovo. The secondary users, namely the project's stakeholders, would use the information to learn about what works when advancing anti-corruption efforts in Kosovo. The project's donors, SDC and Sida, might use the evaluation for accountability and as input for decision-making purposes. Overall, all users could use the evaluation for accountability and transparency purposes, to hold UNDP accountable for its development contributions. The evaluation team sought to ensure the full and active participation of all users as relevant throughout the evaluation process.

3.4.2 Specific Approach

The evaluation's principal guide was the project document, in particular the Results Framework containing its logframe and M&E framework, which provided an indication and outline as to the set of questions that the evaluation team asked each stakeholder group. Draft Informant Interview Guides are provided at Annex II. Additional questions are provided in the Evaluation Matrix (Annex I).

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[15] https://www.betterevaluation.org/methods-approaches/approaches/utilisation-focused-evaluation

The evaluation team analysed the potential for further outcomes to which the project might contribute in the longer term. A linear approach to the evaluation based on the benchmark of results against indicators was insufficient to grasp the nature of the results produced and to identify the key facilitating and constraining factors. The methodological approach selected by the evaluation team thus allowed for a non-linear approach, which enabled an evidence-based analysis of the relevance, efficiency, effectiveness, impact and sustainability of the project's interventions as well as the cross-cutting themes.

3.5 Data collection methods and instruments

A number of different data collection methods and instruments were utilised by the evaluation team in order to collect as much primary and secondary, quantitative and qualitative data as possible to ensure the integrity of the evaluation. This allowed for the maximum reliability of data and validity of the evaluation findings, as well as generating feedback looks and insights to inform future planning.

(a) Desk research and document review of 28 documents: The evaluation team conducted a detailed desk research and document review as part of the inception phase. This process was ongoing throughout the evaluation to obtain additional information, to validate and verify preliminary findings, and to fact-check and cross-reference data and information. Documentary review findings were recorded using a standardised analytical tool derived from the evaluation matrix, questions, and criteria; and triangulated against other data sources to generate robust findings. Data collected from all sources were captured and systematised in a framework according to the key evaluation questions. The desk review and document research were triangulated with other data collection methods used in this evaluation to answer the evaluation questions as specified in the ToR and evaluation matrix.

(b) Financial Analysis: A detailed financial analysis was undertaken of the project's financial reports and related documentation to determine the level of efficiency of the project implementation.

(c) KIIs/GDs with 40 project partners and stakeholders: 13 women (33%) and 27 men (66%) were consulted during 26 key informant interviews and group discussions. The level of involvement of both men and women in the evaluation process contributed to the credibility of the evaluation and its findings. The qualitative interviews were conducted using interview protocols developed based on the evaluation questions (main questions and sub-questions). The interviews were semi-structured, with questions included from the interview guide, but also with enough flexibility to expand the topics of conversation based on the respondent's knowledge of the project's activities and the project overall. In all cases, participants were approached to provide informed consent and the evaluation team treated all information that respondents provided as confidential, in as much as their comments were generalised and/or reported in such a way that they could not be traced back to a particular individual. This was intended to foster a frank discussion and to encourage interviewees to provide an accurate assessment of the project.

A summary of the data collection is provided below:

|				
+28	**40**	**33%**	**11**	**15**
documents analysed	Individual consulted	women participation	KIIs	Group Discussions

Total 40 partners and stakeholders consulted

- Government representatives
- State institutions
- CSOs/NGOs
- Beneficiaries
- Responsible partners
- SDC/Sida
- UNDP project and programme staff
- UNDP Senior Management

15 Group Discussions
with project partners & stakeholders

11 Key informant Interviews
With project partners & stakeholders

Disaggregation of Stakeholders consulted by Sex

13 Women (33%)
27 Men (66%)

33% 67%
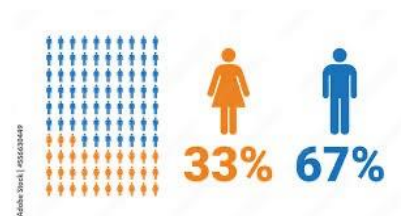
3.6 Workplan, management arrangements and resource requirements
3.6.1 Workplan
Please see below for a summary of the deliverables and responsibilities including the evaluation phases (data collection, data analysis and reporting).

Activities	Deliverables	Timeframe
Briefing by UNDP; evaluation design, methodology selection, workplan formulation including stakeholder list, design of data collection tools and instruments; submission of Inception Report, and approval of Inception Report	Inception report containing the methodology to be applied during the final evaluation, as well as the work plan and technical instruments to be used during the assignment was drafted, submitted, and endorsed by UNDP.	Submission of draft IR – 29th April 2024 Approval of Inception Report – 30th April 2024
Consultations, field visits, KIIs and group discussions; debriefing to 1) donors and 2) UNDP and ERG	Two online debriefing workshops with 1) SDC and Sida and 2) UNDP and key stakeholders are held and initial findings and recommendations presented.	Data collection – 6th – 17th May 2024 Debrief with donors – 5th June 2024 Debrief with UNDP – 7th June 2024
Submission of Draft Final Evaluation Report; consolidated comments to the draft report; finalisation of the Evaluation Report	Draft final Evaluation report with the methodology applied, a presentation of findings, a presentation of the lessons learned and clear strategic recommendations is submitted.	Submission of draft Evaluation Report – 6th June 2024 Consolidated comments shared – 19th June 2024

	A FE report accounting for stakeholders' feedback on the first draft is produced and validated by UNDP.	Submission of Final Evaluation Report 21st June 2024

3.6.2 Management Arrangements

The evaluation was managed by the Evaluation Reference Group, led by the Evaluation Manager from the UNDP Kosovo Country Office. The UNDP SAEK III project team was closely involved in the planning and execution of all stages of the evaluation. The ERG and the SAEK III project team were jointly engage in the planning and reporting stages, including the finalisation of the stakeholder list, the Inception Report, Debriefs and presentations of preliminary findings and recommendations, and the Final Evaluation Report.

Evaluation team

The evaluation was comprised of an International Evaluation Specialist and Team Leader and a Local Evaluation Specialist. A brief summary of their roles and responsibilities is provided below.

Joanna Brooks – International Evaluation Specialist

Joanna was the International Evaluation Specialist and Team Leader for the FE. As such, Joanna's role was to lead and coordinate all aspects of the evaluation as outlined in the ToR. Joanna provided general oversight as well as ensuring that quality and consistency is maintained throughout the reporting process. Responsibilities included desk research and document review of all project documentation and supporting documentation; preparation and submission of inception report; participation in the collection of primary data; analysis of primary and secondary data, presentation of preliminary findings; preparation and presentation of evaluation report. At all stages of the evaluation, Joanna maintained regular communication with the Evaluation Manager as well as with the UNDP SAEK III project team.

Jeta Pajaziti – Local Evaluation Specialist

Jeta was the Local Evaluation Specialist and supported all stages of the FE process. In particular, Jeta provided the analysis of the local context and the political economy of the current situation in Kosovo, in which the project has been implemented. Jeta was engaged in all stages of the evaluation process including the desk research and document review, designing data collection tools and instruments, data collection and drafting and analysis. Jeta was responsible for the organisation of the external stakeholder meetings in Kosovo. Together with the International Evaluation Consultant, Jeta participated in the debriefing workshops to present initial findings and recommendations and assisted and supported the preparation of the final evaluation report and the presentation of findings.

Resource requirements

The evaluation was conducted both virtually and in-person. The evaluation team finalised the list of stakeholders in coordination with UNDP SAEK III and relied on the Evaluation Manager to introduce the evaluation team to stakeholders. The Local Evaluation Expert organised all logistical requirements (travel, transportation etc.) necessary for conducting the in-person data collection for the evaluation.

4. Analytical Framework

In order to analyse the collected data, the following analytical methods were applied by the evaluation team:

Contribution Analysis

In the complex humanitarian/development context in Kosovo, it was difficult for the Final Evaluation to attribute the observed results *solely* to the project. This was partly because of the number of stakeholders involved, partly because of other exogenous factors, and partly because of the complex nature of the project itself. For this reason, the evaluation team adopted a contribution analysis approach, which did not firmly establish causality but rather sought to achieve a plausible association by analysing the project's ToC and Results Framework, documenting the project's successes and value-added, applying the "before and after" criterion, i.e., what existed now that did not exist before and what had changed since the start of the project, and through considering the counterfactual – what would have happened without the project.

Political Economy Analysis

A political economy approach recognised the local and regional contexts and the incentives faced by the actors engaged in it, i.e., the internal and external factors that determined success. This helped the evaluation team to understand who sought to gain and lose from the project, as well as to identify who had vested interests and the social and cultural norms that needed to be taken into account. Applying political economy analysis helped answer why things were the way they were and helped unpack the enabling environment by understanding the political economy drivers behind corruption in Kosovo. A political economy approach also allowed the evaluation team to consider the geo-political sensitivities at play in the country and the region and how these might have affected (positively or negatively) the project. This included being cognisant of the political, social and economic changes that had taken place during the project implementation.

Quantitative and Qualitative Data Analysis

Most of the primary data collection methods (key informant interviews and group discussions) collected qualitative data. These were analysed using a code structure[16], aligned to the key evaluation questions, sub-questions and indicators. The qualitative data from the primary data collection methods were cross-referenced with other sources such as documents. The quantitative data produced was anticipated to produce descriptive analysis (rather than more complex regressions). This was because the majority of the data collected was qualitative rather than quantitative.

Triangulation

Triangulation was the process of using multiple data sources, data collection methods, and/or theories to validate research findings. The evaluation team used more than one approach (data collection method) to address the evaluation questions in order to reduce the risk of bias and increase the chances of detecting errors or anomalies. Wherever possible, all data gathered, both qualitatively and quantitatively, were triangulated through cross verification from two or more sources. For interviews, this was done through posing a similar set of questions to multiple

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[16] A code structure was used to code the data in alignment with the key evaluation questions. It enabled the evaluation team to take larger sets of semi-structured data and to structure it into smaller segments for further analysis and triangulation.

interviewees. For the document review, it was accomplished through crosschecking data and information from multiple sources to increase the credibility and validity of the material. The evaluation team applied three approaches to triangulation: methods triangulation (checking the consistency of findings generated by different data collection methods); interrogating data where diverging results arose; and, analyst triangulation (discussion and validation of findings, allowing for a consistent approach to interpretive analysis).

Data Synthesis
Data synthesis was the process of bringing all the evidence together to synthesize the data and formulate findings and conclusions. Multiple lines of evidence fed into the contribution analysis. An evidence map was utilized to map information obtained from different sources on the same results area and evaluation questions, and information collected through interviews and case studies. The evaluation team synthesized data in two ways. The first was the process of articulating the key findings and cross-checking the strength of the evidence for each. Based on this, the conclusions were developed and cross-checked for their relevance to the findings.

Verification and Validation
The above steps incorporated verification and validation of evidence during the data collection and data analysis processes. In addition, the evaluation team presented the preliminary findings and recommendations at two evaluation debriefs held first with the donors (SDC and Sida representatives) and then with the ERG and UNDP Kosovo, and this draft report will be shared widely amongst the ERG, the project team and other key stakeholders, allowing for review and comments. These processes will provide an opportunity to share key findings, offer mutual challenges, and discuss the feasibility of and receptiveness to draft recommendations. It will also provide an important opportunity to foster buy-in to the evaluation process, particularly for the stakeholders who will have responsibility for implementing recommendations.

4.1 Sampling Methods for Qualitative and Quantitative Data Collection
The evaluation team used a combination of both purposive and random sampling techniques. For example, purposive sampling was used to try to ensure as equal a gender representation as possible, with a minimum of 40% women interviewees, and for participation in the KII to ensure that the participants could actively engage and provide the needed information during the KIIs. Random sampling techniques were applied for participation in the group discussions to the extent possible.

4.2 Challenges and Limitations of the Evaluation and Mitigation Responses
The evaluation team faced some key biases, including the following:

- *Recall bias*: The project had conducted many activities to date, and it was quite possible that key informants might not accurately remember particular specific project intervention activities. A similar problem could be that participants in multiple UN or other donor activities might blend their experiences into a composite memory or response and, subsequently, would not distinguish between them as separate activities in their responses. The evaluation team mitigated this bias primarily through a semi-structured interview protocol that called for questioning about specific activities from the SAEK III project implementation.

- *Response bias*: Informants might have given the evaluation team only positive remarks about the project because they would like to stay involved with the intervention in the future, and they thought that a negative evaluation could mean the end of project opportunities. The evaluation team adopted two main strategies for mitigating this bias. First, they stressed for each informant that they would maintain confidentiality and anonymity and then explained the evaluation team's independence from both UNDP and the project. Second, as with recall bias, questions designed to elicit specific examples helped to identify response bias.
- *Selection bias*: Beneficiaries provided by the project and its partners could mean that the evaluation team heard only from people who had positive experiences. As with the other forms of bias, multiple sources of data and questions eliciting specific examples helped to mitigate the risk of this bias. In addition, the stakeholders list was agreed collaboratively between the evaluation team and the project.
- *Scope of stakeholder engagement:* While the evaluation aimed to be inclusive, practical constraints such as time, resources, and accessibility might have limited the extent and depth of stakeholder engagement. There might have been relevant voices and perspectives that were not fully captured due to these constraints. The evaluation team made efforts to prioritize key stakeholders, extend engagement opportunities, and utilize varied communication channels.

4.3 Data management plan, informed consent and ethical considerations

The evaluation adhered to international best practices and standards in evaluation, including the OECD DAC ethical considerations for development evaluations[17] and UNEG Ethical Guidelines and Code of Conduct.[18] In addition, the evaluation team signed the UNEG Pledge of Ethical Conduct at the start of the evaluation process. All stakeholder information was handled with confidentiality and in accordance with UNDP's Rules on Personal Data Protection. All interview notes were de-identified by the evaluation team, and all names were changed into a code. Proper storage of data was essential for ensuring confidentiality, and the data protection procedures were adhered to during all stages of the evaluation. At the end of the evaluation, all notes and data were destroyed.

The evaluation was conducted in an ethical and legal manner, taking into account the well-being of those involved in and affected by the evaluation. The evaluation was conducted in accordance with professional ethics and standards to minimise risks to evaluation participants, including the principle of 'do no harm', and a protocol was in place to ensure that the clearly defined informed consent of all evaluation participants was obtained – please see Annex II for the informed consent protocol. All stakeholders were informed that the evaluation was being conducted independently and that their participation in the evaluation was entirely voluntary as well as being confidential and anonymous.

The evaluation team briefly explained the reasons and objectives of the evaluation and the scope of the questions. Stakeholders had the right to refuse or to withdraw at any time. The evaluation team also ensured respondent privacy and confidentiality, as the disclosure of confidential information might seriously jeopardise the efficiency and credibility of the evaluation process.

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[17] https://www.oecd.org/development/evaluation/qualitystandards.pdf
[18] United Nations Evaluation Group (UNEG), UNEG Ethical Guidelines for Evaluation- UNEGFN/CoC , 2008.

Therefore, the evaluation team was responsible for exercising discretion in all matters of the evaluation and did not divulge confidential information without authorisation. The evaluation team respected informants' right to provide information in confidence and also ensured that sensitive information could not be traced to its source so that the key informants were protected from reprisals. Original data, including de-identified interview notes from interviews, were retained by the evaluation team until completion of the evaluation at which point they were destroyed. Nothing in the evaluation report has been attributed to any individual, organisation or institution.

The evaluation's value added was its impartial and systematic assessment of the project. As with the other stages of the evaluation, involvement of stakeholders did not interfere with the impartiality of the evaluation. The evaluation team had the final judgment on the findings, conclusions and recommendations of the evaluation report, and the evaluation team was protected from pressures to change information in the report. Additionally, if the evaluation team were to identify issues of wrongdoing, fraud or other unethical conduct, UNDP procedures would have been followed and confidentiality be maintained.

5. Findings

This chapter presents the analysis and findings of the final evaluation grouped around each of the evaluation criteria and cross-cutting issues and based on the analysis of the qualitative and quantitative data collected. Each of the key evaluation questions is answered within the narrative and the analysis and findings are also informed by the guiding questions provided in the ToR and evaluation matrix.

5.1 Relevance

Finding 1: The project is highly relevant to the national development priorities of Kosovo, as reflected in its National Development Strategy 2030 and its Rule of Law Strategy 2021 - 2026. It also contributes towards Kosovo's EU aspirations, as reflected in Chapter 23 of the EU Acquis. It is well aligned with and contributes towards the development priorities of its donors, Switzerland and Sweden. Further, it tessellates with UN and UNDP's national, regional and global priorities, including the UN's Common Development Plan for Kosovo and UNDP's Strategic Plan 2022 - 2025. Moreover, the project convincingly contributes towards Kosovo's progress towards achievement of the 2030 Agenda and the Sustainable Development Goals, notably SDG 16, targets 5 and 6.

The project was highly relevant to the national development priorities of Kosovo, as reflected in its National Development Strategy 2016 – 2021, as well as the National Development Strategy 2030.[19] In particular it contributes towards the pillar on Safety and the Rule of Law, which aims that *The Kosovo Police and other law enforcement authorities will be trained to fight organized crime and corruption, while the increase in the number and professionalism of prosecutors and judges will reduce the time it takes to resolve these cases.* It also contributes to the pillar on Good Governance including the introduction of *accountability mechanisms where every politician and public servant is responsible for his actions or inactions, and public resources are managed in the right way; better administrative services for citizens and businesses that are easy to use and easily accessible, including more electronic services; and a government that is open and transparent to its citizens on the spending of public money, by strengthening internal and external control over budget spending.*

The project is also well aligned with and contributes towards Kosovo's Rule of Law Strategy 2021 – 2026, in particular objectives 4.2.2. Improving professionalism in the fight against organized crime and high-level corruption and 4.4 Strengthening the Fights Against Corruption.[20] The project was designed to directly contribute to the implementation of the priorities of the Anti-Corruption Strategy 2020-2024. However, due to factors beyond the control of the project, this Strategy was not adopted.

The project was relevant for the development priorities of its donors in Kosovo. It directly contributed towards the SDC Strategy for Cooperation 2017-2020, as well as the more rent SDC Strategy for Cooperation 2022 – 2025 and in particular the Swiss portfolio on Democratic Governance and Peace Outcome 1 *Women and men enjoy the benefits of strengthened democratic*

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[19] https://kryeministri.rks-gov.net/en/national-development-strategy-2030/

[20] https://md.rks-gov.net/desk/inc/media/8EF86336-E250-4EA2-9780-D4B8F7E853B5.pdf

governance and peace and *Outcome 1.1: State institutions are more accountable and citizens are more engaged in public affairs.*[21]

The project also contributed to the Sweden Strategy for 2021-2027 for Reform Cooperation in Eastern Europe, the Western Balkans and Turkey,[22] and its pillar on *Human rights, democracy, the rule of law and gender equality*. The objectives of this pillar to which the project contributes are - *Better democratic governance and greater respect for human rights and the rule of law; Improved conditions for accountability, increased transparency and reduced corruption*; and *Better prospects for a gender-equal society.*

Furthermore, the project contributes to the European Union's (EU) integration enlargement policy, as reflected in Chapter 23 of the Acquis on Judiciary and Fundamental Rights, and addresses the concerns about the functioning of the rule of law, and in particular anti-corruption, as detailed in the regular EU progress reports.

The project is highly relevant for the UN and UNDP at both the global and country level, as reflected in UNDP's previous Strategic Plan 2018 – 2021, as well as its current Strategic Plan 2022 – 2025;[23] the UNDP Global Programme on Rule of Law, Human Rights and Security;[24] and the United Nations Kosovo Team Common Development Plan outcome 1.1: rule of law system and institutions are accessible to all and perform in a more efficient and effective manner and outputs of the UNDP Kosovo Results and Resources Framework.

Moreover, the project convincingly contributes towards Kosovo's progress towards achieving the 2030 Agenda and the Sustainable Development Goals. In particular, the project contributes towards SDG 16 and its Goal to *Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.* Specifically, the project contributes towards two of SDG 16's targets, Target 5 - *Substantially reduce corruption and bribery in all their forms* and SDG 16 Target 6 - *Develop effective, accountable and inclusive institutions at all levels.*

Finding 2: The project is highly relevant to its stakeholders – the anti-corruption institutions in Kosovo. The project design process was inclusive and participatory allowing the project to be tailored to their needs and the needs of the people of Kosovo in general, as well as being nationally driven. The project is able to offer practical solutions based on the needs of the institutions, using international standards and best practices, tailored to the Kosovo reality. The project design was informed by the previous two phases of SAEK, providing it with a strong evidence-base for the design of the project's activities. The project has been able to respond well to external challenges influencing its operational context, including the COVID-19 pandemic as well as internal political changes and the external geopolitical realities in the region.

Most importantly, the project is highly relevant to its stakeholders, the anti-corruption institutions in Kosovo. The design of SAEK III was participatory and inclusive and based on extensive

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[21] https://www.eda.admin.ch/countries/kosovo/en/home/international-cooperation/strategy.html
[22] https://www.government.se/globalassets/regeringen/dokument/strategy-reform-cooperation-western-balkans-and-turkey-2021-27.pdf
[23] https://www.undp.org/sites/g/files/zskgke326/files/2021-09/UNDP-Strategic-Plan-2022-2025_1.pdf
[24] https://www.undp.org/rolhr

discussions and consultations with the project's partners. In particular, the project was designed together with the heads of the institutions included in the prodoc. As one stakeholder informed:

"We sat down before the start of the project and told UNDP our needs. The project reflected this and tried to fill the gaps."

Another confirmed:

"UNDP provides qualitative support, which is aligned with our strategic objectives."

This allowed the project to be tailored to the needs of its stakeholders and the people of Kosovo in general, as well as being nationally driven. The project design was also informed by the previous two phases of SAEK, building on the results gained and lessons learnt and providing it with a strong evidence-base for the design of the project's activities. It was also informed by the final evaluation of the SAEK II project, with recommendations from the evaluation being incorporated and addressed in the SAEK III project document.

Throughout its implementation period, the project has had to be flexible and adaptable to its operational context. It began implementation at the height of the COVID-19 global pandemic, requiring it to immediately shift all activities to an online modality. While this inevitably caused some delays, the project was able to continue with implementation and supported its partners with the shift to the new working modality. The project has also had to react to the internal and external political developments and reality. Notably, the envisaged Anti-Corruption Strategy 2020 – 2024, with which the project's outcome 1 was aligned, was never adopted, new legislation and amendments to existing legislation often took longer than expected to be adopted and reforms to the institutional framework, all impacted the project's implementation. The first year of the Project was also characterised by political instability as the first Albin Kurti cabinet collapsed in a no-confidence vote on March 25th, 2020, then the Avdullah Hoti Cabinet that was formed on June 3rd, 2020, was determined on December 21st, 2020, by the Constitutional Court to be invalid, and finally the second Kurti cabinet was formed on March 22nd, 2021. These developments translated into a paralysis of the public service as it was focused on government changes and elections and then the leadership hesitancy to take decisions, affecting all operations. Furthermore, the unsettled changes of leadership of multiple SAEK institutional stakeholders caused delays in project activities. For example, in 2022 the Chief State Prosecutor (CSP), Director of FIU, the Supreme Court (SC) President, and the Police General Director were led by 'Acting' leaders. Finally, due to unrest in the north of Kosovo, the criminal justice chain had to reallocate resources and attention towards the north affecting decision-making but also availability of staff to drive processes and to attend SAEK activities. For example, several police officers were assigned to the north and could not participate in two specialised training on Asset Recovery and Financial Crime. The project was able to adapt adeptly to these internal and external political developments, adjusting its activities and providing support based on the needs and the operational reality on the ground. This was in large part due to the high level of expertise within the project, reflected in the project staff's extensive knowledge of the Kosovo political context, combined with its experience and knowledge of international standards and best practices in anti-corruption programming. As one of the project's stakeholders commented:

The project also adapted its approach based on needs. For example, the initial approach for the support provided by the Basel Institute to The Special Prosecution of the Republic of Kosovo (SPRK) was online. This was in part due to COVID-19 , but proved not to be efficient, so the approach was changed and a technical expert from the Basel Institute was embedded into the SPRK. The success of this approach is discussed further below under Finding 4.

Finding 3: The project's Theory of Change was grounded in thorough research and analysis and was evidence based and demand driven. It was underpinned by a solid risk assessment and sound assumptions, which remained relevant throughout its implementation. Building on the foundations laid in SAEK I and II, the project used a human rights-based approach, to further strengthen the normative framework, institutional capacities and the public's awareness of and engagement in anti-corruption processes in Kosovo. This enabled the project to work both vertically and horizontally – working with the executive at central and municipal level, the judiciary and with citizens. Through these approaches, the project has been able to skilfully position itself as the key anti-corruption partner for both institutions and communities in Kosovo. More qualitative indicators in the project's results framework would allow it to better capture its contribution towards higher level results.

The Theory of Change (ToC) for the project was grounded in thorough research and analysis and was both evidence based and demand driven, being informed as detailed above, by both the results and lessons learned from SAEK I and II, as well as extensive discussions and consultations with the project's partners. This allowed the ToC to detail and address the root causes underlying grand corruption involving public officials and the low accountability and transparency of institutions.

The project's ToC was also underpinned by a solid risk assessment, which was regularly reviewed and updated throughout the project's implementation, as well as sound assumptions, including that the four main project partners represented on the project board (Supreme Court, the Office of the Chief State Prosecutor, the Anti-corruption Agency,[25] the Financial Intelligence Unit) must continue to play vital roles in combatting corruption with impartiality, professionalism and must strive to build capacities and undergo restructuring so as to enhance their results in preventing and suppressing corruption.

The project was developed using a human rights-based approach, to further strengthen the normative framework, institutional capacities and the public's awareness of and engagement in anti-corruption processes in Kosovo. Through these approaches, the project has been able to skilfully position itself as the key anti-corruption partner for both institutions and communities in Kosovo. In addition to its well elaborated ToC, which charts the causal pathway foreseen to achieving results, the project's results framework contains the three outcome statements and seven output statements, together with their corresponding indicators. Each of the outcomes have one corresponding indicator, while there are 20 output indicators spread across the seven output areas. This totals 23 indicators through which the progress of the project is monitored and measured.

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[25] As per Law no. 08/L-017, supported by SAEK III and passed on July 1st, 2022, the Anti-corruption Agency was transformed into The Agency for Prevention of Corruption.

However, this is a very large number of indicators, which are exclusively quantitative and are more focused at the activity or output level and do not necessarily allow the project to fully capture its results. While the evaluation team was informed that this approach was done in agreement with the project's donors, more qualitative indicators in the project's results framework would have allowed the project to better capture its contribution towards higher level, outcome results.

5.2 Effectiveness

This section analyses the effectiveness of the project and is broken down by each of its three outcomes. While it does not analyse all of the project's activities, it uses certain activities and results to evidence the findings.

Finding 4: The project's approaches have contributed to its effectiveness. The project has provided a high-level of technical expertise to strengthen the normative framework on anti-corruption, including through supporting the development of 22 key primary and secondary legislation and policies. This has provided the basis for fighting corruption in Kosovo, providing the institutions with the correct mandates and facilitating the introduction of institutional mechanisms to enable the institutions to work together in a coherent and coordinated manner. Overall, the project has ensured that all key anti-corruption primary legislation is in place that complies with the United Nations Convention Against Corruption and other international standards. The neutrality of the UN in providing exposure to international standards has built trust between the project and its stakeholders and contributed to the achievement of results. Embedding technical experts into anti-corruption institutions has been a key driver of results.

The project's first approach, as captured in its outcome 1, was to enhance the policy, regulatory and monitoring framework on the prevention and suppression of corruption. Support was focused 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. Three outputs reflected the project's approach - Output 1.1 - Policy and legal anti-corruption framework implemented in gender sensitive manner; Output 1.2 - AC Strategy 2020 – 2024 effectively implemented in gender sensitive manner; and Output 1.3 - Anti-corruption Strategy and Action 2024-2028 developed in gender sensitive manner.

Despite the challenges faced in its operational context as detailed under finding 2 above, the project has achieved significant results. In 13 eight pieces of legislation and by-laws have been adopted and a further 9 are pending adoption with the support of SAEK III. These are detailed in Annex VII. The project is supporting the entire legal framework and the adoption of the main Laws paved the way for the project to support the development of secondary legislation in the form of by-laws and regulations. Three key pieces of legislation that have been adopted with the support of the project are the Law on the Agency for Prevention of Corruption, the Law on Asset Declaration and the Law on Financing of Political Parties.

The adoption of the Law on the Agency for the Prevention of Corruption in 2022, marked a key milestone in the project. Having supported its predecessor Kosovo Anti-Corruption Agency, the new Law elevated the Agency to a specialised Agency dealing with i) conflict of interest, ii) whistle-blowers and iii) deceleration of assets. UNDP's support was integral to this process and

with the project's support the new Law equips the agency with administrative sanctioning powers which allows the agency to issue fines directly instead of going through the court, something that the agency did not have thus far. SAEK was crucial to the adoption of the Law as well as in supporting its implementation. This included the development of the system for online declaration of assets, developing a methodology for the anti-corruption proofing of legislation; and support to the drafting of Integrity Plans. This included through the provision of an embedded expert who brought in international standards and perspectives. As one stakeholder commented:

"SAEK's support has been crucial to the success of the Agency for the Prevention of Corruption."

The main feature of the Law on Asset Declaration is the online declaration of assets, which was developed by the project, and which enables fast and efficient processing of data to avoid human errors that have occurred in the past. In addition, the Law has expanded the categories required to declare assets into two main categories: seniors officials and public officials (more exposed to corruption risks). The project supported the development of the methodology for the online declaration and provided tools and ensured the system is in place. This was done in an extremely short period of time, evidencing the project's ability to be responsive and adaptive to the needs of its stakeholders. With the Law being adopted in August 2022, the online system was already operational by February 2023. It its first week, 5,000 public servants had already submitted their online declarations. The project then support the training of additional public servants on how to use the system, which resulted in an additional 6,000 registrations. In total, 98% of public servants used the online system to declare their assets and only 2% relied on the previous, paper based system in 2023. While the Agency is still carrying out the verification process, they have already referred some cases to the prosecution. This evidences not only the utility of the system, but also its value in terms of detection of corruption in Kosovo.

Another key area of support provided by the project has been with regards to the introduction of Integrity Plans, which have become a legal requirement for central level public institutions as of 2024. Following the development of a standardised methodology and instructions for drafting and integrating integrity plans, the project engaged the FOL Movement to conduct trainings for 10 central public institutions on the development of their Integrity Plan based on the approved methodology. As a result of the support provided by the project, not only did the 10 central public institutions develop and submit their Integrity Plans, but these were also used by other institutions in the development of their own Integrity Plans. In total, by the legal deadline, 100/140 institutions submitted Integrity Plans using the SAEK supported methodology. The project has also supported the development of software to monitor the implementation of the Integrity Plans, which will be operationalized by the end of Q2 2024.

The project has provided targeted and meaningful support to the implementation of the Law on Financing of Political Parties, which was adopted in September 2022. The law ensures transparency in funding and expenditure, timely reporting, and auditing of financial statements by political entities, and effective and proportionate sanctions for violations. Following its adoption, the Central Election Commission (CEC) approached UNDP for support on developing the internal regulations required to implement the Law as well as the software required for web-based registration and certification of political parties. As one stakeholder commented:

While the online system will not be fully operational until March 2025, it is anticipated to have far-reaching impact in the transparency of the financing of political parties in Kosovo. Concurrently, UNDP supported the development of the CEC's internal regulations, allowing it to operate in accordance with the Law. This included the regulation regarding the appointment of the CEC Director and the internal regulation on the financial control of political parties.

Other key legislative support provided through the project has been with regards to the Draft Law on Court Appointed Experts, the Draft Law on the State Bureau for Verification and Confiscation of Unjustified Assets and the development of amendments to the Law on Notaries. The Draft Law on Court Appointed Experts will enable the establishment of an appointment mechanism which has been lacking since 2013. This Law will allow for the registration of court experts and an envisaged online system will be situation with the Kosovo Judicial Council (KJC). The court experts are currently being identified and the adoption of the Law is pending a decision by the Constitutional Court.

The Draft Law on the State Bureau for Verification and Confiscation of Unjustified Assets is vital for the successful combatting of corruption. The SAEK Project has been proposing since 2017 the establishment of such a Bureau. However, with the legal initiative pursued by the new government, the establishment of the Bureau needs to be closely monitored to prevent any misuse of the new institution to target political opponents by introducing clear and rigorous rules of procedures for initiating and handling cases. Despite the ongoing constitutional review of this Law by the Constitutional Court of Kosovo, SAEK has actively participated in developing recommendations for the internal structure of the Bureau. Once the Law is finalized and enters into force, these recommendations will be shared with the Ministry of Justice (MoJ). SAEK's paper envisions the following units to support the Bureau's mandate: Legal Department, Risk Analysis Department, Department of Verification and Forensic Accounting, and Department for Finance and General Services. The organizational structure outlined in the internal organization regulation, subject to final approval, reflects a strategic alignment with the Bureau's responsibilities.

SAEK has provided assistance to the MoJ in the development of amendments to the Law on Notaries. SAEK's primary focus in this amendment process was centred on introducing the possibility of conducting notarial transactions through electronic means. This initiative aimed to lay the groundwork for an automated notarial platform, which will ultimately contribute to the population of specified notarial data within the Tax Administration of Kosovo's Investigation Tool. This is discussed further below under 5.3 – digitalisation.

The project has also been providing support in the development of the Anti-Corruption Strategy 2024 – 2028 and its corresponding Action Plan. Kosovo has not had an Anti-Corruption Strategy for six years and with the support of a SAEK expert embedded in the Office of Prime Minister (OPM) a draft Strategy and Action Plan were developed by the OPM during 2023. However, due to a number of concerns raised by international partners regarding the lack of a consultative process in the development of the Strategy, the draft was not adopted at the end of 2023 as envisaged, and

was circulated more widely during the early part of 2024. It was noted by some stakeholders that more technical support from the beginning, rather than only logistical support as SAEK provided to the OPM, could have facilitated a more consultative process that would result in a more refined document in line with European and international standards, potentially preventing these concerns and making the process more expeditive. The Draft Strategy and Action Plan is currently being scrutinised by GRECO experts and it is envisaged that it will be adopted on International Anti-Corruption Day on 8 December 2024. Despite the challenges in the development of the draft, this is the first time that the Government of Kosovo has taken full ownership of the drafting process and has fully led on its development. This should be recognised as a key achievement in the capacity building of Kosovo's institutions in addressing and preventing corruption. Once adopted, the OPM has already asked UNDP to support implementation and the monitoring of the Action Plan.

Thus, there is considerable evidence that the project has ensured that all key anti-corruption primary legislation is in place, which complies with the United Nations Convention Against Corruption and all international standards. The neutrality of the UN in providing exposure to international standards has built trust between the project and its stakeholders and contributed to the achievement of results. As one stakeholder confirmed:

"The work on legislative reform is remarkable and an achievement in itself."

The project has introduced a best practice in terms of supporting anti-corruption bodies in Kosovo through the embedding of technical experts in a number of the anti-corruption institutions to support the achievement of results and provide capacity building to strengthen the capacities of the institutions. This has included embedding a technical legal expert in the MoJ, who has provided valuable legal expertise to the MoJ by actively participating in working groups for the drafting of anti-corruption legislation and policies. A Data Management and Integration Expert was embedded in the Tax Administration of Kosovo (TAK), who has provided valuable technical and IT expertise on the development of an integrated database and connectivity, including merging various databases and formats with other agencies in Kosovo; and as mentioned above, a technical expert was embedded in the OPM for the development and monitoring of the Anti-Corruption Strategy, with a focus on coordinating and compiling various inputs from sectorial ministries and members of the working group. This approach has proved transformational in achieving the objectives of the project and has been highly valued by the anti-corruption institutions. As one stakeholder commented:

"The expertise provided through the project was of very high quality. We appreciate their work and their expertise is very important to use and their knowledge including on international standards and best practices."

Due to inconsistencies in the adjudication of corruption related cases, in particular in cases of defendants who are politically connected, the project supported the development of Sentencing Guidelines for Corruption Offences. The Guidelines were adopted by the SC, but despite the project's efforts to include adherence to the Sentencing Guidelines in the performance review of the judiciary, this was not approved by the KJC, meaning that the Guidelines are currently non-binding. With its implementing partner, ROLAG, the project has been monitoring the

implementation of the Sentencing Guidelines. As reported by the project, throughout 2023, the project has received a total of 81 court cases. Based on the cases that were analysed, 40 were convicting judgments and 41 acquitting judgments. Out of the 40 convicting judgments analysed, 22 of those fell out of the sentencing guidelines sanctioning range while 18 judgments were listed as within the sanctioning range of the sentencing guidelines. Comparing to 2022, although more cases were analysed, the number of cases with convictions remains low. Out of all cases reviewed only 50% of those were convicting. Since then, the evaluation was informed that ROLAG has monitored over 300 cases and is starting to see a slight improvement, however the low conviction rate indicated that Kosovo still has some way to go in improving its results in sanctioning high-level corruption and returning stolen assets. Going forward in the longer term, consideration could be given to introducing specific legislation to make the Sentencing Guidelines mandatory in specific types of cases, as is the case in other jurisdictions such as the US and the UK and as has recently been introduced in North Macedonia.

Finding 5: The project's capacity development approaches and convening power have strengthened Kosovo's anti-corruption institutions and provided them with capacity and tools to effectively detect and suppress corruption. Key successes have included the establishment of the Assets Recovery Office (ARO), the upgrading of the Strategic Analysis Division within the FIU, strengthening the capacities of institutions to issue corruption charges and increasing the awareness of citizens on their rights and responsibilities on public transparency and accountability. There is evidence that the project has contributed to the transformation of how Kosovo institutions approach anti-corruption as well as citizen's understanding of transparency and accountability.

The project's second key approach has been through the provision of well targeted and specific capacity building to strengthen Kosovo's anti-corruption institutions and their capacities to detect, repatriate hidden stolen assets and process corruption cases effectively. This was approached through three complementary outputs - Output 2.1 - Anti-corruption institutions have improved tools and capacities to issue charges; Output 2.2 - Successful adjudication of corruption cases; and 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.

One of the project's key achievements has been the upgrading of the FIU's Strategic Analysis Unit into a Strategic Analysis Division. The supported provided through SAEK, in the form of capacity building and technical expertise, led to a significant increase of cases opened for alleged crimes relating to money laundering in construction, crypto-currencies, remittances, cross-border cash smuggling, financial flows to high-risk drug and terrorism countries. The Unit opened new cases involving Politically Exposed Persons (PEPs) using strategic analysis tools which paved the way for proactive investigations of targets without first receiving a Suspicious Transaction Report (STR) from a bank or other private sector reporting entity which had a knock-on effect of eliminating the potential for political interference into cases. The success of the Unit led to a decision by the FIU to upgrade it to a Division for Strategic Analysis in 2024, which evidences the project's effective support. As one stakeholder commented:

"The project has been extremely fruitful in producing concrete results of the fight against money laundering, always related to the field of anti-corruption."

This has resulted in considerably strengthening the capacities of the institutions to initiate anti-corruption cases that are based on evidence, with supporting data and analysis. A knock-on effect of this is that the institutions no longer fear retribution for bringing cases, because they have the evidence, data and analysis to prove them.

The project has strengthened Kosovo's anti-corruption institutions to issue corruption charges through a series of tailor-made capacity building programmes. For example, with the Basel Institute the project developed a Training of Trainers (ToT) curricula and training programme for new investigators and anti-corruption officials on how to conduct investigations and run cases. The training was tailor-made and was developed following a self-funded scoping mission by the Basel Institute to customise the training to the Laws and reality in Kosovo. The training used techniques that had never been used before in Kosovo and was a combination of 50% theoretical and 50% practical training, being based on a real life case. Another feature of the training was that it was multi-disciplinary and the ToT included a Judge from the Special Department of the Basic Court Pristina, a Prosecutor from the Serious Crime Unit, a Prosecutor from Appellate Prosecution and a representative from the FIU. The training was conducted over 5 days and has now been integrated into the curricula of the Kosovo Judicial Academy (KJA). Over 10 trainings have been conducted so far for over 200 police, customs, prosecutors, judges, FIU, tax administrators etc. The training is certified by both the KJA and the Basel Institute. Participants are given learning materials that they are able to use in their everyday work, for example, the table of evidence/proofs/offences. The training has not only brought about an increase in knowledge, but also in how participants approach investigations and run cases. As one stakeholder informed:

"Not only have we seen a big increase in knowledge but we are also starting to see that the participants are beginning to think differently, for example about the types of evidence, or the elements required to bring a case."

Another key success has been the establishment of the Asset Recovery Office (ARO) under the Chief State Prosecutor's Office. In 2008, Kosovo established an Asset Recovery Unit in the police, which has two designated police officers, but was never functional. This Unit was dissolved in mid-2023, paving the way for the establishment of an ARO. The project has provided considerable support to this process, not least in ensuring that it was placed under the Office of Chief State Prosecutor. It also provided considerable technical assistance, including capacity building, technical advice, drafting regulations and establishing contacts with institutions. With the project's support the ARO was able to sign Memorandums of Understanding with most of the key anti-corruption institutions, namely KP, FIU, AMSCA, TAK, and Kosovo Customs. This demonstrates UNDPs convening power because they had to get a large number of institutions to agree. It also evidences that UNDP has both the tenacity and capacity to do this.

However, at the time of conducting the evaluation, the ARO has only just launched and it is too premature to assess what the effects of this new office will be. The ARO will need considerable capacity building assistance going forward, in terms of training, developing SoPs, developing software and ensuring it is fully budgeted and fully capacitated to function.

Other key results under this outcome have been the embedding of an external expert from the Basel Institute into the SPRK. The expert has provided technical advice and assistance that has resulted

in investigation plans, requests from foreign jurisdictions and the development of stolen asset recovery strategies. In addition, the expert provided well-targeted support through training investigators on stolen asset recovery and provided legal drafting advice to the Office of the Prosecutor Legal Committee on drafting a regulation for the establishment of the ARO. The SPRK continued to submit cases to the Basel Institute for further technical assistance, including one grand corruption case involving multiple foreign jurisdictions. The technical expertise was of very high quality and highly valued, tailored to the local context and needs based and demand driven. As one stakeholder commented:

"The capacity building with the Basel Institute was highly needed and beneficial and has led to changes in how we approach cases. It has helped us to chase the money and address organized crime and money laundering."

The expert also provided trainings and sessions through the Know-How Forum established by ROLAG. The Know-How Forum serves as a multi-institutional mechanisms to facilitate discussions on the challenges the anti-corruption institutions face in their work. Established in 2022 by ROLAG with support of the project, it is led by the National Coordinator for Fighting Economic Crime. The Forum has provided a platform to bring together representatives from the Prosecution System, KP, FIU, AMSCA, and the Basel Institute.

Together with the GAP Institute, the project has considerably raised the awareness of the citizens of the need for transparency and accountability in budget processes. GAP digests the annual budget documents, as both central and local level and digests this, reproducing it for citizens in an accessible manner. This has contributed towards addressing the misuse of funds and decreasing opportunities for corruption. For example, since GAP started to analyse the data on the amounts allocated for hospitality and travel, subsequent budgets have decreased these amounts. Not only have GAP's efforts increased transparency and accountability but they have also enabled citizens to access information and led to more realistic budgets based on citizen's needs. With SAEK's support, the GAP Institute pushed for publication of the "Analytical Card of Accounts," which if managed to be mainstreamed as a legal requirement would completely transform the level of transparency. This is something the project should continue to advocate for. The GAP publication with regards to the political parties' influence on capital investments from central to local level, is another key and unique success, which resulted in generating a large public debate, as well as a debate at the Assembly of Kosovo.

Together with SAEK, GAP has also conducted an annual student competition to mark International Anti-Corruption Day. The competition has become something of a tradition in Kosovo and encourages a youth participatory approach in policy-making processes, through forging ideas and forming perspectives. For example, in 2023, students were encouraged to research and discuss about best practices of other countries that have had an impact in reducing corruption, analyse the impact of corruption in public procurement for the economy, and the positive impact of technology in improving transparency. For the second topic they were encouraged to analyse public-owned enterprises, their sustainability mechanisms and transparency measures. This novel approach has encouraged students to get involved, contribute, and engage in important public policy issues and also to ensure that the youth is included in public policy discussions.

Finding 6: The project has considerably raised both the awareness and engagement of citizens in the fight against corruption. This has included an increased awareness of what corruption is and how it is tackled, as well as through initiatives to report, refer and monitor corruption. The KALLXO.com initiative, introduced through SAEK I, has proven instrumental in this process and offers a replicable model for strengthening civic engagement mechanisms in anti-corruption processes.

Under outcome 3, the project has focused on strengthening civic engagement mechanisms to hold public institutions accountable, through an online platform developed through SAEK – KALLXO.com. Kallxo is an online platform for reporting corruption, fraud, conflict of interest, and other related cases of misuse of official position, negligence and including cases on hampering the Kosovo citizens' rights that was established during the first phase of SAEK.

During the 12 years since its establishment, KALLXO has dramatically changed the level of awareness and understanding of citizens in Kosovo on what is corruption, the effects or corruption, how to register incidents of corruption and how corruption cases are investigated and brought. It has shown the citizens of Kosovo that you can report corruption and something will be done. The shift in mentality and culture amongst the citizens can be seen by the exponential increase in the number of incidents of corruption being reported on the platform as well as awareness raising activities conducted by KALLXO. One of the most instrumental of these has been a recent television series of 13 episodes depicting the work of the prosecution in uncovering corruption cases. The shows aim to provide citizens access into the work of the prosecution and also the process of investigations and have resulted in an increase in people reporting corruption cases directly to the prosecution. This may also be a contributory factor in the increase in trust that citizens have in the prosecution, which has increased from 4% to 26% between 2004 – 2024.[26] As one stakeholder commented:

"The awareness raising among the public through KALLXO is one of the biggest results of the project and is tangible."

While the ultimate aim is to hand over the KALLXO reporting platform directly to the prosecution, it is still gauged as being too early for this, until the public's trust in the prosecution service increases further. The KALLXO data speaks of itself. Up to the end of 2023, 12,286 cases were filed, out of which, 9,083 were transferred to relevant institutions. This resulted in the following sanctions:

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https://app.powerbi.com/view?r=eyJrIjoiOTk5YTI3NTMtZjQ0YS00ZWEzLTlhZGEtZTZiYjQ5Njc3NzNmIiwidCI6ImIzZTVkYjVlLTI5NDQtNDgzNy05OWY1LTc0ODhhY2U1NDMxOSIsImMiOjh9&pageName=ReportSectionad48e4d89a7fa2291420

Arrests	• 20 police officers • 20 business owners
Disciplinary procedures	• 18 judges and prosecutors • 5 Tax Administration officials • 20 public officials for conflicts of interest
Indictments	• 20 municipal officials • 2 ministers • 1 judge • 5 officials of public enterprises • 19 police officers (out of which 13 were convicted)
Tax violations	• 100 businesses
Money laundering charges	• 17 people
Failure to declare assets and income	• 20 public officials

5.3 Digitalisation

Finding 7: The project has skilfully developed a number of digital solutions as key tools for enhancing the transparency and accountability of anti-corruption institutions in Kosovo. It has provided capacity development support to ensure that the institutions are capacitated to take over the operation and maintenance of these platforms and tools. However, a number of these tools have yet to be operationalized and it is too premature to assess their longer-term impact.

A number of key digital solutions have been introduced by the project to support the transparency and accountability of the anti-corruption institutions in Kosovo. As detailed under Finding 4 above, the project supported the development of an electronic Declaration of Assets platform, through developing a methodology and providing the tools to support the system. This resulted in the registration of over 11,000 public servants or 98% of those obliged to declare their assets.

The project has supported the TAK in the development of an online investigation tool. Building on the system provided by the UK's HMRC, SAEK provided an expert to help develop the system and connect the TAK to other law enforcement agencies. The TAK has already signed an MoU with the prosecution and is producing reports for them on potential incidents of corruption. As one stakeholder informed:

"SAEK really helped us to develop processes and to improve the quality of our data so there are less mistakes and it is more reliable, especially for the prosecution of potential cases of corruption."

The online platform will be developed to allow automated data transfer from the notaries to the Tax Administration for investigation purposes. The initial plan is that the platform will transfer data to the Tax Administration platform only for transactions worth more than 30,000 euros.

Furthermore, for the purposes of an investigation, the Tax Administration will receive information on whether the parties to the proceedings are PEPs. This will encourage the Tax Administration to investigate possible misuse of powers for personal gain (given the fact that the Tax Administration already has information on taxes paid by the population of Kosovo) and forward this information to the prosecution. PEPs will be investigated for any transaction made through notary offices, and this will limit the potential adverse impact on society. While the system is still being finalised and it is too premature to assess its results, it is anticipated to have far reaching impact in possible misuse of powers for personal gain cases. Specific expertise that was provided by the project through the technical expert includes the following:

- Upgrading of the iBASE Software to the latest version and adding new features to the DHTI[27] database.
- Development of comprehensive security policies for DHTI system data classification.
- Integration and updating of data from MIA institutions, Notaries, Cadastre, Ministry of Finance, and other relevant sources.
- Creation of markings for available data according to criteria from DHTI and creation of periodic.
- Development of analysis models through iBASE and the Analyst's Notebook Application for the needs of DHTI.
- Design of red flag / alerts for entities that are entered into the system as per the marking criteria. Development of an automated report for the needs of the prosecution.

The project has also supported the development of software for a platform to monitor the financial aspects of political parties. SAEK engaged an expert to formulate technical requirements, contributing to the overall effectiveness of the platform. The platform will be tested at the end of May 2024 and will become fully operational as of 1 March 2025. Three levels of stakeholder will have access to the platform – the CEC, political parties and auditors, while the citizens of Kosovo will be provided with general information. Again, while too premature to assess the impact of this platform in it envisaged that it will allow the CEC and the Office to effectively oversee and regulate political party financing and promote integrity and legality in political party funding and expenditures.

The project was approached by the AMSCA to support the development of a database for digitally recording all the moveable assets in its depot. The platform will be ultimately linked to a larger database, which is being developed by the Council of Europe and will also be linked to the public auction website, allowing for the selling of confiscated assets. This aspect is under development by GIZ. This support was provided very swiftly and was highly appreciated, as one stakeholder commented:

> "We approached UNDP because we had already waited for 2 years for support from the EU. UNDP was very expedited and the expert support provided was of high quality."

Similarly, it is still too premature to assess the results of this initiative.

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[27] DHTI is an Albanian acronym *Departamenti i Hetimeve Teknologjia Informative* which in English is Department of Investigation – IT.

The project has also supported the development of the Notarial Case Management Platform to monitor potential corruption risks. However, since the development of the functional requirements for the Notary Platform as well as the beta version of the platform, there have been a number of challenges with both the server space and other IT configurations as well as a reluctance on the part of the Notary Chamber of the Republic of Kosovo to sign MoUs between respective agencies/ministries related to the platform. In addition, the coordination between MoJ and ASI related to the server space and other IT configurations were heavily delayed and challenged. There are also challenges with regards to ensuring the platform complies with the Law on Data Protection.

Another digital solution as part of maintaining citizen's trust in the overall justice system, SAEK III supported the prosecutorial system in increasing transparency and accountability within their structures and to the citizens through the development of the prosecutorial web-portal. This portal shall be an important and digital tool containing all important information, documents and events related to the prosecutorial offices/institutions. The portal is due to be launched during the first week of June 2024.

It is envisaged that once all of these databases, platforms and tools are fully operationalised the accountability and transparency of the respective anti-corruption institutions will be considerably enhanced, however it is too early to assess their impact, beyond the Declaration of Assets online platform, which has proven to be highly efficient. A consolidated list of the digital solutions designed through the project and their current status is provided at Annex VI.

5.4 Efficiency

Finding 8: The project has been implemented in a lean and cost-efficient manner, offering good value for money for the results it has achieved and its anticipated future results, through identifying low cost – high impact measures combined with the long-term approach of both the project and its donors. Through forging strong partnerships with its responsible parties, the project's activities have been implemented efficiently. The world class expertise that the team is able to offer, both within the team itself and the external expertise it can bring in to the project, is highly regarded.

The project adopted a number of approaches to enhance efficiency throughout its project implementation. This included the guiding approach of identifying low cost measures combined with the long-term approach of both the project and its donors. This has proven to be highly effective and is evidenced by both the high level of results achieved as well as the accumulation of results. Many results gained in SAEK III were as a result of initial results gained during SAEK I and II and/or the laying of groundwork in SAEK I and II to enable the achievement of results in Phase III. The project has achieved a good value for money co-efficient throughout its implementation. Project donors informed that they were satisfied with the value for money given the results achieved by the project. One commented:

"I can see the project is bringing good value for money and even extra results."

The project has forged strong partnerships with its responsible parties – Internews Kosova, GAP Institute and ROLAG, as well as with the Basel Institute, which have contributed to the efficient of the project. These partnerships are discussed more fully under Finding 11 below.

With regards to the efficiency of the staffing structure, the project has been implemented by a well capacitated team, ably led by its project manager and supported by the Chief Technical Advisor and other team members. All team members have extensive anti-corruption expertise, which is highly regarded and valued by the project partners as well as by external partners. Many of the project's staff are long-standing, providing the project with robust institutional knowledge as well as allowing the team to cultivate strong partnerships based on trust. Without fail, the evaluation team were informed by all partners and stakeholders of the extremely high level of dedication and commitment of the team; the excellent partnerships and relationships that have been developed by the team; the high level of technical expertise that the team is able to offer; and the genuine willingness of the team to provide assistance to the partners, not only to further the results of the project, but also simply to help. The team are highly valued as being experts in their field and not simply as project managers or implementers. In addition, the project is very discreet, despite being implemented in a highly politicised and sensitive area and this has led to increased trust. Overall, the stakeholders have a high level of trust in both the project and the project staff, which is visible and frequently acknowledged. As one commented:

"UNDP is a trusted and experienced partner, who brought us much needed technical expertise."

Finding 9: The project developed a robust monitoring framework to ensure that activities remained on-track and to course correct where necessary. The project board meetings have proved a useful forum for coordination, to raise understanding and to achieve better results. Despite delays caused to the implementation of the project, the project's delivery rate has increased since the end of the COVID-19 pandemic and in 2023 reached an impressive 94%. In terms of its achievement against indicators, the project has met or over exceeded 15/23 of its indicators, however the project's results framework does not always allow for the capturing of all of the project's qualitative results. Lessons learned could be better captured and shared more broadly.

The project has developed a robust monitoring framework and is conducting monitoring at the project and programme level, as well as reporting and informing stakeholders. At the project level, weekly monitoring meetings are conducted where the project team refer to the Annual Work Plan (AWP) and track progress, discuss challenges, what has worked well and what not etc. At the programme level, there are twice monthly meetings held where the project reports on its progress. This also included discussions with the UNDP Governance unit where discussions are held to identify potential synergies. At the strategic level, the project's CTA is regularly monitoring as well as providing quality assurance of the project's reports and any press statements.

By-monthly donor coordination meetings are held to progress and challenges are discussed and minutes are taken and shared afterwards. Also organize partnership coordination meetings on a 6-monthly basis. SAEK is the Chair and efforts are made to avoid any overlap and duplication and identify potential synergies. Implementing partners report to the project on a quarterly basis in the form of both narrative and financial reports and monthly meetings are organized with them.

The project has been efficiently managed throughout its implementation and the Project Board meetings have served as a forum for coordination and to discuss challenges and results. It brings together all four key anti-corruption institutions, the SC, the FIU, the APC and the OCSP. It also allowed for the fostering of contacts between institutions and aided to the efficiency of the project through active, focused discussions. As one participant informed:

> "Through the Project Board meetings, we learnt about challenges that other institutions are facing and then changed our work."

Members of the Project Board informed the evaluation team of the utility of the meetings. They also informed that they regularly receive information relating to the meetings in advance and receive minutes and other relevant follow-up after each meeting.

The project's delivery rate has increased during its implementation period, being considerably impacted by the global COVID-19 pandemic. This has resulted in a non-cost extension of the project until 31st December 2024. However, in 2023, the project's delivery rate was an impressive 94% and the project is on-track to delivery highly by the end of its implementation period.[28] The delivery rate is illustrative of the project developing a realistic budget that is based on the needs of its partners.

In terms of its progress against indicators, the project has met or over achieved 15/23 of its indicators, including 2 of its 3 outcome level indicators. The remaining outcome level indicator and three of the project's output level indicators are on-track to be met by the end of the implementation period. The remaining two indicators will not be met as they relate to the implementation of the 2020 Anti-Corruption Strategy, which was never adopted. However, as discussed elsewhere in this report, the project's results framework and indicators are largely quantitative and do not fully allow the project to capture all of its results, in particular at a higher, outcome level. For full details of the project's progress towards its indicators, please see Annex V.

The three phases of the SAEK project have been implemented over a 12-year time period, during which, a significant number of lessons learned have been generated as well as knowledge gained. While the project has made some efforts in capturing and documenting these, and there is considerable institutional knowledge within the project team, additional efforts could be made to capture lessons learned and share them more broadly. Through individual contacts, the project has shared its knowledge and lessons learned with UNDP anti-corruption programming in Iraq, Moldova, Fiji, Montenegro, Albania and Timor L'este.

5.5 Impact

This section assesses the impact of the SAEK III project, examining the significant changes that have resulted from the intervention at the individual, community, and institutional levels. This

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[28] Delivery rate reflects expenditures occurred already together with committed funds.

analysis uses specific activities and outcomes to evidence the broad impacts of the project, informed by qualitative and quantitative data collected throughout the evaluation period.

Finding 10: SAEK III has had a profound impact on reducing corruption and enhancing transparency across various levels of society and governance. The project has had a significant and multifaceted impact on Kosovo's efforts to combat corruption, affecting a broad spectrum of society and governance. The project's comprehensive approach, combining policy support with practical tools and expert technical assistance, has laid a strong foundation for sustained anti-corruption measures in Kosovo.

Despite the project not including impact indicators to measure its impact, from analysis of the project's results it can be seen that SAEK III has had a profound impact on reducing corruption and enhancing transparency across various levels of society and governance.

At the institutional level, the project has fortified the legal and operational frameworks essential for combating corruption. By supporting the drafting and implementation of critical anti-corruption legislation, and by embedding technical experts within institutions, the project catalysed significant structural changes. These include the establishment of the ARO and enhancements in the operational capacities of the FIU, APC and other key agencies. The project has instilled durable changes in behaviours and practices related to corruption and transparency. For instance, the institutionalization of practices such as online asset declarations at the APC and the implementation of Integrity Plans across public institutions have laid a foundational structure for continued progress in governance transparency and accountability. The strategic analysis tools and training provided to institutions like the FIU and the APC have led to a higher detection rate of corruption cases and more effective enforcement actions. As one stakeholder said:

> "UNDP has transformed how Kosovo institutions think about how they should tackle anti-corruption, and it is not only through some dry policies, etc., but it is the practical work and the daily support and contact that has positioned UNDP as one of the most trusted and better organisations that understands where the problems are and designs solutions as per their needs."

At individual and community levels, the project has contributed to a significant increase in public awareness and participation. Initiatives like KALLXO.com (as described in finding 6) have significantly boosted public engagement, empowering citizens to actively participate in anti-corruption efforts. This has led to a notable change in public attitudes towards corruption, fostering a culture of accountability and transparency. Then, there has been a marked increase in the public's willingness to report corruption and a greater awareness of the mechanisms available for such reporting. This change is further reflected in the increased trust in prosecution, from 4% in 2004 to 26% in 2024, indicating a strengthened social contract and heightened public expectations for accountability. This shift is crucial for long-term cultural change in perceptions of corruption.

Some indication of the impact of the project can be gauged from analysing the project's outcome level indicators. In addition to the adoption of 8 key pieces of primary legislation and by-laws facilitated by the project, anti-corruption institutions have succeeded in exponentially increasing stolen asset recovery, with the final year figures for preliminary assets confiscated at 324% annual increase and final assets confiscated at an incredible 3423% annual increase. The number of

subjects investigated through e-platforms has steadily grown and is now part of regular investigative procedures. The number of money laundering cases has grown each year, however the number of indictments on corruption charges has been sporadic. This may indicate a focus on high level grand corruption cases as a strategic priority. Further, the KALLXO.com corruption allegation reporting platform has maintained its position as the most trusted platform for citizens to report corruption. The number of cases reported and verified has increased annually, and the final available figure of 1,748 verified cases is a 105% increase since the start of the project. The reports resulted in 75 criminal complaints and fourteen sanctions against officials named in the complaints. However, including impact indicators or conducting an impact assessment, would have allowed the project to better capture its results at the impact level.

5.6 Sustainability

Finding 11: The project was designed with the sustainability of results in mind, although these were not captured in a defined Sustainability or Exit Strategy. While sustainability has not yet been fully realised across all project interventions, there are strong indications that point towards sustainability prospects and there is a visible shift towards nationally-driven results. National ownership of both the project and its results is assessed as very high. However, there is a need to continue to reinforce the sustainability of the project's results and ensure that the results gained are not lost going forward.

The project document for SAEK III contains a section on the sustainability of the project's results as well as a brief strategy. However, as of the time of conducting the evaluation, a full Sustainability and Exit Strategy has not been produced by the project and there seems to have been some misunderstanding between the project and its donors about if and when this was expected. Developing this at the outset of SAEK III would have helped to guide the implementation of the final phase of the project and focus the project on ensuring the sustainability of its results. That said, there are strong indications that point towards the sustainability prospects of the projects results, which with some reinforcement should anchor the results more firmly within the system.

First, the project's approach was designed with sustainability in mind. From building on previous results, developing an evidence based and demand driven project, with full participation of the project's stakeholders, enabled a high degree of ownership in the project and its results. In addition, the technical expertise provided through the project built the capacities of the institutions, contributing to the sustainability of the support. As one stakeholder commented:

"We see this as our project and UNDP are just helping us through the provision of technical expertise and ensuring we meet international standards."

Another commented:

"We see during the project board meetings the commitment and ownership of the national stakeholders."

The structure of the project, through combining strengthening the policy and legislative framework with the provision of capacity building and tools to implement the legislation and policies, while

simultaneously raising the awareness of the public of their rights and responsibilities with regards to anti-corruption, has also led to the sustainability of the project's results. The effects of primary and secondary legislation adopted, and now being implemented, will continue beyond the lifespan of the project. The capacity building provided has strengthened the capacities of institutions to implement the legislation and policies going forward and training curricula have been handed over and embedded in institutions such as the KJA, allowing national stakeholders to continue with conducting training independently of the project.

Another indication of the sustainability of the project's results and the high level of ownership is with regards to the project starting to attract government cost sharing for some of its activities. For example, the project secured cost-sharing with the MoJ on the development of asset confiscation tools and the establishment of the Bureau for the Verification of Unexplained Wealth. The ability of Kosovo to create the Bureau rests in large part on the results achieved through SAEK.

Beyond the high degree of ownership, perhaps one of the key indications of sustainability is in the changing of mindsets and behaviours, which anecdotally, is beginning to be seen. As one stakeholder informed:

> "We are starting to see a mindset change, especially with regards to the acceptance of best practice."

Another confirmed this, commenting:

> "There is a maturing in understanding among the institutions but this level varies greatly, especially among judges and prosecutors, for example with regards to the use and application of circumstantial evidence. They now need to apply what they know."

Generally speaking, through the SAEK project, the legislative and policy framework is in place, the institutions are in place and have the correct mandates to fulfil their functions, the procedures and processes are in place to allow them to implement their mandates and the institutions are funded by the Government of Kosovo. However, there are still some risks to ensuring the long-term sustainability of all of the project's results. This includes the adoption of some of the pieces of legislation, notably the Law on the Bureau for the Verification of Unexplained Wealth and the amendments to the Law on Notaries, as well as the operationalisation of all of the digital platforms created by the project. In addition, many of the results achieved by the project would benefit from additional support to ensure their sustainability. This includes operationalising and fully capacitating the ARO, conducting oversight of political party financing, ensuring the adoption of and then monitoring the implementation of the Anti-Corruption Strategy and its corresponding Action Plan and ensuring the effective and efficient management of seized assets.

The results achieved in partnership with civil society are more varied in their level of sustainability, because the CSOs are donor funded. However, there is a noticeable shift in the understanding of the role of civil society and the project has forged partnerships between civil society organisations and some of the anti-corruption institutions. The GAP Institute will continue the excellent work it has done regarding the budget analysis beyond the lifespan of the project and will most likely continue to run the annual student essay writing competition, which is a low-cost initiative.

However, ROLAG remains donor dependent and the Know-How Forum may have better sustainability prospects if it were handed over to the ARO, once the ARO is fully functional. Without donor support, the FOL Movement will not be able to continue assisting institutions in developing Integrity Plans and in this context, it would have been advantageous for APC representatives to attend or lead the 10 workshops with institutional representatives on drafting these Plans, thereby enhancing both the practical effectiveness and the long-term sustainability of the training outcomes.

The project has made concerted efforts to address the sustainability of the KALLXO platform during SAEK III. This included efforts on introducing a system of crowd-funding as well as introducing a subscription service. However, these efforts have as yet, not come to fruition. In the longer term, the vision for KALLXO should be for it to focus on the investigative journalism aspects, while reporting of cases of corruption should be handled by the police or prosecution.

5.7. Stakeholders and Partnership Strategy

Finding 12: The project has established strong partnerships both with its implementing partners as well as with other development partners working on anti-corruption efforts in Kosovo. This has allowed it to convene stakeholders to ensure the implementation of the project and to achieve results. The engagement of specialist partners positively affected the efficiency of the project implementation and results. The project has driven coordination with external partners, ensuring that there was no overlap or duplication, while also allowing it to identify synergies and complementarities where possible. The project has had regular communication with its donors, although it could have relied more on its donors to provide political support on sensitive issues when needed, through more frank communication.

The project has established solid partnerships with a broad partnership base, which has allowed it to convene stakeholders to ensure the implementation of the project and to achieve results. This includes the partnerships it created with its implementing partners – ROLAG, GAP Institute and Internews Kosova as well as with FOL Movement and the Basel Institute and the KJA. While SAEK consistently engaged in regular interactions and meetings with donors and subsidiaries, it did not facilitate joint meetings among implementers or between implementers and donors. Establishing meetings between UNDP and the subsidiaries would have promoted synergy and potentially improved project outcomes.

The approach of the project to engage specialist partners positively affected the efficiency of the project implementation and results. For example, the technical expertise provided through the Basel Institute significantly enhanced the capacities of the anti-corruptions institutions. The engagement with ROLAG was initiated due to the project's desire to enhance their capacities on financial investigation and asset recovery through both capacity building, provided by Basel and through the establishment of the Know-How Forum. The project and its stakeholders had identified a need and a gap among CSOs in dealing with stolen asset recovery and selected ROLAG based on its experience with the judiciary and that it was not perceived as being overly critical of the government. The project has had a long standing relationship with the GAP Institute, which continued during SAEK III, building and expanding on previous results, such as expanding the

budget analysis platform to include municipal level budgets, thus bringing transparency and accountability closer to the citizens. All partnerships were built on mutual understanding and the project cultivated a high degree of trust. As one of its partners commented:

> "We had outstanding cooperation with UNDP. The project team is very dedicated and highly responsive. We have never had a better symbiotic relationship with any counterpart."

Amongst development partners, the US and the EU are the biggest stakeholders at the policy level and it is to the project's credit that it achieved an equal partnership with them. This was achieved through constant communication and coordination, ensuring that there was no overlap or duplication and identifying synergies where possible. For example, the project sat with representatives from the US to identify areas where the Basel Institute could provide assistance, complementary to the assistance being provided by the US to the Special Prosecutor. The project agreed with the Council of Europe implemented and EU funded PECK project, that PECK would address the issue of whistleblowers, so this was not included in SAEK's efforts. Together with the CoE, the project conducted a joint activity with the FIU on strategic analysis. The project organised partnership briefings with international partners to further the communication and coordination and to exchange information. .

Perhaps where there has been less consensus has been with regards to the develop of the Anti-Corruption Strategy, which was perceived by some partners as being developed in a non-consultative and participatory manner. Once these concerns were brought to the attention of the project, the project made concerted efforts to expand the process of Strategy development to address the concerns of the partners.

Other organisations with whom the project has partnered include UNODC with whom the project conducted activities on raising the awareness of activity corruption amongst high-school students, as well as with Organization for Security and Co-operation in Europe (OSCE) who also provided support to the CEC.

The project has had regular communication with its donors, conducting bi-monthly donor meetings, responding to ad hoc requests as well as the annual narrative and financial reporting and project board meetings. However, the donors felt that the project could have relied on them more to provide political support on sensitive issues when needed and that more frank communication would have aided this. The project should not be afraid to discuss issues and challenges with its donors.

5.8 Cross-cutting themes - Human Rights and Gender

Finding 13: While the project was designated as GEN 1, meaning it has no dedicated budget or activities allocated towards gender or inclusion, it made considerable efforts to mainstream gender and inclusion across all of its activities achieving solid results in terms of gender equality and women empowerment. The project made concerted efforts to be inclusive, despite the constraints of the political context.

The project did not have a specific focus on gender and inclusion and was designated GEN 1 meaning that it had a limited contribution towards gender equality. Despite this, the project made considerable efforts to mainstream gender across all of its activities. This included the gender sensitisation of all primary and secondary legislation, efforts to ensure a 30% participation rate of women in all of the project's capacity building activities as well as including a focus on women in its awareness raising activities. It its annual reporting, the project detailed gender related data and information for all of its activities.

Through this, the project has been able to achieve a nearly 40% participation rate on average across all of its activities, with some activities, such as the student essay competition far exceeding this. This is a substantial achievement, particularly in view of the gender structure of Kosovo's state institutions, which are still heavily balanced in favour of men. The project introduced gender responsive budgeting analysis in its analysis on the budget platform, conducted with the GAP Institute and also did an analysis on women owned businesses in public procurement processes.[29] In addition, initiated in SAEK II, the project has conducted a series of three Gender Specific Corruption Risks and Vulnerabilities Analyses.

Further, while not explicitly addressed by the project, there is a link between tackling corruption within the prosecution and the effect this has on femicide. Very often, those who commit violence against or kill their partners have a criminal past, but due to corruption in prosecution, they did not receive the deserved prison time.

The project also made efforts to be as inclusive as possible, despite the challenges of including all of Kosovo's ethnic groups in the project's activities. For example, the project had planned for the capacity development training programmes developed by the Basel Institute to be delivered in both Albanian as well as Serbian. And while all training materials were prepared in both languages, the training was not ever conducted in Serbian, due to the geopolitical circumstances at the time, and the context in North Kosovo, in particular after September 2023.

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[29] "Public Procurement in Kosovo and Inclusive Economic Empowerment", https://www.institutigap.org/documents/36291_Public procurement and inclusive economic empowerment found that the law overseeing public procurement in Kosovo, called the Public Procurement Law, does not consider gender, and it does not match up with the Kosovo Law on Gender Equality. The study of 9,673 contracts from 2022 revealed that 81.1% went to male-owned businesses, 10.3% to women-owned, 5.8% to businesses co-owned by women, and 2.7% with indeterminate ownership. Men-owned businesses received 78.7% of the total funds (about 405 million euros), while women-owned businesses obtained 4.9% (around 25.4 million euros). The report suggests aligning the public procurement process with Kosovo's gender equality laws, recommending targets for women-owned businesses, and emphasizing data collection on women's involvement and the impact of procurement decisions on gender equality.

6. Conclusions

Based on an assessment of the OECD DAC evaluation criteria, the evaluation team can make the following conclusions:

Relevance: Highly aligned with national goals and international standards

SAEK III was meticulously designed to align with Kosovo's national priorities and international standards, effectively supporting legislative reforms and strengthening institutional frameworks for combating corruption. Its responsiveness to Kosovo's evolving socio-political landscape further underscores its commitment to addressing specific anti-corruption needs and broader international governance commitments.

Coherence: Strong alignment with other initiatives and policies

SAEK III demonstrated exceptional coherence, aligning seamlessly with both national anti-corruption strategies and international standards. The project complemented other interventions and policies by filling critical gaps in Kosovo's anti-corruption efforts, such as enhancing legal frameworks and integrating international standards and best practices. This synergy not only amplified the project's effectiveness but also ensured consistency across various governance reforms, contributing to a unified approach to combat corruption in Kosovo.

Fig. 1: Source:

OECD Evaluation Criteria

Effectiveness: Achieved significant legislative and institutional enhancements

SAEK III effectively supported the development and implementation of key legislation and strengthened institutional frameworks essential for combating corruption, achieving its objectives successfully. It provided the tools required for the institutions to implement the legislation and significantly empowered the citizenry of Kosovo, expanding their
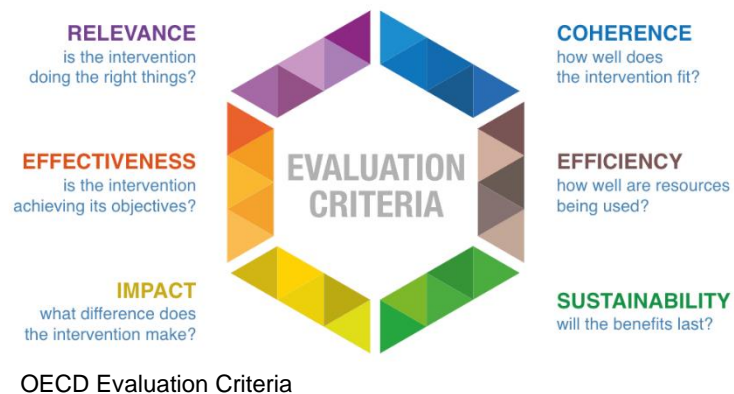
Efficiency: Optimal use of resources for maximum impact

The project demonstrated high efficiency in resource utilization, implementing activities that maximized impact, such as embedding technical experts and leveraging UNDP's convening power, leading to substantial improvements in anti-corruption efforts. It adopted an approach of low-cost: high impact, which contributed to its results. Furthermore, the project staff is highly capacitated and the project was able to offer its stakeholders both internal and external world-class expertise, which was highly

Impact: Significant behavioural changes at multiple levels

SAEK III has markedly influenced behaviour and practices across individual, institutional, and community levels, fostering a robust culture against corruption. At the community and individual levels, it has heightened public awareness and participation, with platforms like KALLXO.com empowering citizens to engage actively in reporting and combating corruption. Institutionally, it has reinforced the legal and operational frameworks necessary for these entities to effectively tackle corruption, thereby establishing a more transparent and accountable

Sustainability: Established strong foundations for enduring anti-corruption measures

SAEK III has laid a robust foundation for sustained anti-corruption measures in Kosovo. By enhancing institutional capacities, embedding technical experts, and developing comprehensive legal frameworks, it has facilitated sustainable governance changes. Community empowerment through awareness initiatives ensures that corruption prevention remains a public priority, fostering long-term stakeholder support and vigilance.

7. Recommendations

As this Final Evaluation marks the end of the three phases and 12 years of implementation of the SAEK project, a small number of recommendations have been provided that can be used to inform the remining implementation period under the no-cost extension to December 2024 as well as to guide UNDP's future programming on supporting anti-corruption efforts in Kosovo. These are actionable recommendations aimed at fully embedding and further reinforcing the results gained to date. This is particularly pertinent given that both SAEK and the EU's long-standing PECK project will end in 2024, potentially leaving Kosovo without any support in the area of anti-corruption going forward. Each recommendation provides a series of next steps, who they are addressed to and a time-frame for implementation. A greater focus has been placed on capturing some of the lessons learned, which can be future developed and shared more broadly within the UNDP system. This are provided in Chapter 8.

Recommendation 1 The project should develop an Exit Strategy and Sustainability Plan that clearly defines the steps and processes required to embed the project results in both the remaining no-cost extension phase as well as going forward. This should be done as soon as possible. This should feed into the development of follow-on projects and a Resource Mobilisation Strategy to ensure the sustainability of project results.
Recommendation targeted at SAEK III, immediate priority, based on findings 4, 5, 6, 7, 10 and 11 and conclusions

The project should immediately focus on developing an Exit Plan and Sustainability Strategy This should clearly define and detail the steps that need to be taken in order to fully embed and institutionalise the results achieved. This should address the financial sustainability of the project's results and areas where advocacy will be required to ensure the inclusion of project results into the national budget and institution level budgets as well as the sustainability of the results achieved with civil society organisations. Inevitably, not all project results will be fully sustainable by the end of the no-cost extension period to 31 December 2024, and in this respect, the project should address what will be required beyond the lifespan of the project to ensure the sustainability of its results – e.g. full adoption of all Laws, secondary legislation and tools required for implementation of Law; monitoring and oversight of project results etc. This will help identify areas where future UNDP assistance will be required and provide the project the evidence and data needed to develop follow-on projects (see recommendation 5). This can then be used to develop a targeted Resource Mobilisation Strategy.

Next Steps:
- Develop a short-term Exit Plan to cover the remaining project implementation period to 31/12/2024 – *short-term*
- Develop a mid-longer term Sustainability Strategy to cover any future required programming to reinforce and embed project results – *short/mid-term*
- Develop a Resource Mobilisation Strategy to attract funds for potential future programming on Anti-Corruption – *short-mid-term*

Recommendation 2 The project should codify and share all knowledge gained and lessons learned throughout the three phases of SAEK implementation. Going forward, standardised mechanisms

for learning, should be introduced, which would ensure that all knowledge, evidence and lessons learned gained are captured and fully institutionalised. Consideration could also be given to creating a knowledge hub that would contribute to UNDP's Global Portal on Anti-Corruption for Development.[30]

Recommendation targeted at SAEK III and UNDP short-mid-term priority, based on findings 4, 5, 6, 7 and 9 and conclusions

The project has established itself as a key partner in anti-corruption programming in Kosovo and generated a wealth of knowledge and lessons learned during its 12-years of anti-corruption programming in Kosovo that many others could learn from. The project should make efforts to codify and capture all lessons learnt to date and make efforts to share this more broadly within the UN system.

Going forward, any future project requires standardised mechanisms for learning, which should ensure that all knowledge, evidence and lessons learned gained are captured and fully institutionalised.

Consideration should be given to creating a knowledge and evidence-base hub or repository that can be accessible to all relevant stakeholders. This would contain knowledge products (policy guidance, fact sheets, guidelines and recommendations) and pilot initiative insights, best practices and lessons learned. This could assist UNDP and other UN Agencies as well as government bodies, the judiciary, regional bodies, CSOs and development partners, including the project's donors, in furthering anti-corruption efforts at the national, regional and global levels. This could form part of UNDP's Global Portal on Anti-Corruption for Development[31] and opportunities to fund the development of such a hub, should be explored internally within UNDP as well as externally with other development partners.

Next Steps:
- Codify and capture knowledge and lessons learned during SAEK I, II and III – *short-term*
- Introduce standardised mechanisms for learning – *mid-term*
- Consider creating a knowledge hub/repository and explore opportunities for funding – *mid-long term*

Recommendation 3 Given the huge number of results that have been achieved by the SAEK project, consideration should be given to undertaking an Impact Assessment. Not only would this assist the project in capturing and showcasing all of its results, but it could also be used to inform future programming and as a basis for resource mobilisation efforts. Qualitative indicators, which can capture behavioural and attitudinal change should be integrated into the Impact Assessment as well as into the Results Frameworks of any future programming in this area.

Recommendation targeted at SAEK III and UNDP short-mid-term priority, based on findings 3, 4, 5, 6, 7, 9 and 11 and conclusions

The project should consider conducting a full impact assessment, which would measure the true contribution of the project to the 2030 Agenda and the SDGs as well as the national development

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[30] https://anti-corruption.org
[31] https://anti-corruption.org

priorities of Kosovo and the priorities of UN/DP at the global, regional and national level. This should include the gathering of quantitative data but have a focus on gathering qualitative data, which would capture the effects of the project on people as well as any contribution the project has made towards changing perceptions, behaviours and mindsets. This would not only help to feed into any future iterations of the project, but would also showcase the project's results and achievements and could be used by others in designing similar interventions as well as for resource mobilisation efforts.

The project has achieved huge results, that are not always fully captured in its results framework due to lack of qualitative indicators. Going forward, UNDP and the SAEK project team should ensure any future projects include a combination of both quantitative and qualitative indicators that would capture behavioural and attitudinal change. Indicators should be SMART (specific, measurable, achievable, realistic and timebound)– and pitched at the correct level – i.e. impact, outcome or output.

Next Steps:
- Consider undertaking an impact assessment towards the end of the no-cost extension – *short-term*
- Develop a carefully considered results framework for future projects with SMART indicators at output, outcome and impact level to fully capture the projects results – *short-mid-term*

Recommendation 4 The project has already attracted government cost-sharing with the Ministry of Justice. Opportunities for additional cost-sharing should be explored with the government and anti-corruption institutions in Kosovo. This will evidence the commitment of the Government of Kosovo to strengthening its corruption framework and will likely strengthen resource mobilisation efforts.

Recommendation targeted at SAEK III and UNDP short-mid-term priority, based on findings 8, 10 and 11 and conclusions

During Phase III of SAEK, the project was successful in attract government cost-sharing with the Ministry of Justice on the development of asset confiscation tools and the establishment of the Bureau for the Verification of Unexplained Wealth. Opportunities for additional cost-sharing should be explored with the Government of Kosovo and the relevant anti-corruption institutions. Not only would this contribute towards the longer-term sustainability of project results, but it would also elevate UNDP at the national level and strengthen its resource mobilisation efforts.

Next Steps:
- Explore opportunities for government cost-sharing –*short-mid-term*

Recommendation 5 – In order to reinforce the sustainability of the project results and informed by the Exit Plan and Sustainability Strategy recommended in Recommendation 1, the project should identify areas that need further reinforcement to really embed SAEK III's results into the system. *Recommendation targeted at SAEK III and UNDP short-mid-term priority, based on findings 4, 5, 6, 7 and 10 and conclusions*

Despite the best efforts of the project, it is inevitable that some of its results will not be fully embedded or sustainable at the end of the no-cost extension. Based on the Exit Plan and Sustainability Strategy, the project should identify areas that will requirement further reinforcement going forward. Areas identified by the evaluation team include the following:

- Adoption of Law and support to establishment of Bureau on Unexplained Wealth - The foreseen Bureau for the Verification of Unexplained Wealth builds upon many of the results produced through the SAEK project, particularly in the capacities built to effectively recover hidden stolen assets, digital solutions on analysing declared wealth, and money laundering strategic analysis. UNDP is best placed to support the creation of this new body given its expertise in the field and involvement in the legal drafting. It is of utmost importance that this body is created in such a way to show maximum effectiveness while maintaining strong legal safeguards. It is also of note that the Kosovo government has demonstrated strong commitment to this initiative and has requested UNDP's support. To date Kosovo has contributed some resources to UNDP to help them establish the bureau. Donor cost-sharing for these initiatives would be recommended given that they would have a significant impact and sustainability is secured through the government's financial and political commitment to the process.

- Operationalisation of the ARO and continued support to ROLAG - The SAEK project has succeeded in helping establish the ARO. This multi-disciplinary team of investigators coached and trained through the SAEK project have the potential to make significant results in stolen asset recovery. However, at the time of the completion of the SAEK project the ARO will have just been established and initial outreach efforts will have been undertaken to analyse existing cases and provide support to prosecutors running cases that involve stolen asset recovery. Given the amount of support provided by the SAEK project thus far, further assistance to the ARO would be very beneficial to ensuring that the ARO grows into its role and becomes one of the most important anti-corruption bodies in Kosovo. It would be advisable if further support could be provided in the form of coaching, training, providing channels of cross-border operational exchanges on cases involving assets hidden abroad, and digital solutions to manage cases and the input received by the various institutions who are part of the ARO (prosecution, police, tax, customs, FIU, AMSCA). In addition, the project should continue to support ROLAG, with a view to ultimately handing over the Know-How Forum to the ARO, once its capacities are strengthened.

- Oversight of Political Party Financing – CEC - Through the SAEK project a Law on Financing of Political Entities was drafted and adopted which paved the way for establishing the new Office for the Registration and Oversight of Political Parties within the CEC. The SAEK project has been the lead in providing support to this new Office through drafting bylaws and creating the database for political party financing which eases the declaration of expenses/donations, monitoring of violations and provides transparency to voters and the general public. Once the SAEK project ends, the need for support to this Office will still remain. Namely, it would beneficial if UNDP could continue to provide support to this Office through training financial officers from political entities on how to use the database and report their income and expenditures, train the CEC officers in charge of oversight, and to increase transparency and the efficacy of cases identified through analysing reports in the database and cross-checking them with public procurement records

and the SAEK developed wealth discrepancy database for possible indications of cases that may involve stolen asset recovery. UNDP targeted support would ensure that the Office remains sustainable and continues to achieve results.

- Implementation of A/C Strategy and Action Plan – APC - UNDP and SAE played the leading role in developing previous anti-corruption strategies and was the lead technical adviser in the development of the current Strategy, expected to be adopted at the end of 2024. In addition, SAEK created the Agency for the Prevention of Corruption database for monitoring the implementation of the Action Plan. To ensure proper implementation and monitoring of the Strategy, both the Action Plan reporting institutions and the Agency in its monitoring function, would benefit with support. Activities in support of the implementation of specific measures, and coaching and training for monitoring implementation would be logical additional activities after the completion of the SAEK project. In addition, the Agency's staff is anticipated to expand by 15 during 2024 and an additional 20 during 2025, all of whom will require capacity building.

- Enhancing Strategic Analysis of Money Laundering offenses - The UNDP SAEK driven establishment of a Strategic Analysis Division within the Financial Intelligence Unit (FIU) has led to significant proactive investigations into politically exposed persons and other sectors. The Division could provide additional impetus to enhancing success rates in money laundering and corruption investigations, including the recovery of hidden stolen assets. As has been recommended in the mid-term evaluation as well, the FIU would benefit from receiving support and guidance from a foreign FIU profiled in Strategic Analysis. In addition, a future project could support the FIU in producing trend reports that forecast money laundering threats based on strategic analysis products. These analyses could feed into the work of the Asset Recovery Office, the Bureau as well as the Agency for the Prevention of Corruption and the CEC for preventive purposes. Possible follow-up projects in this area on anti-money laundering would be helpful in sustaining results and continuing Kosovo's positive trajectory in prosecutions and stolen asset recovery.

- Management and oversight of seized assets – AMSCA - The SAEK project has succeeded in establishing a stolen asset recovery system from which it is highly likely that there will be a steady increase in the value and types of assets recovered. Through SAEK, the AMSCA has been equipped with an asset management database which has made storage and disposal of movable assets much more transparent and efficient. With the increase of higher quality stolen asset recovery cases developed thanks to the ARO, it is anticipated that for the first time AMSCA will be faced with the challenge of managing and running immovable assets such as businesses. The Kosovo authorities will need significant support in setting up a system to manage seized businesses through public administrators until final judgement or liquidation procedures are in place, improve communication with judicial authorities on assessing criminal activity involved in the operation and ownership of businesses, and finally develop transparent criteria for the allocation of funds received through the disposal of seized assets upon criminal convictions.

- Expand more into high-risk areas – for example health and education and possibly construction and the environment - The health and education sectors, as well as construction and the environment, have continuously come up as high-risk areas for corruption in independent assessments. Moreover, these sectors disproportionately affect women and vulnerable groups. UNDP could build upon its successes in developing sectoral corruption risk assessments and its gender and corruption assessments by targeting these

sectors through gender sensitive sectoral corruption risk assessments. A consolidated corruption risk assessment of the corruption sector could also be undertaken. The findings in these assessments could be used to make and promote policy prescriptions at the local and central levels. Furthermore, these recommendations would provide valuable insight into the development of mitigation measures within the Integrity Plans of local level institutions for which UNDP has significant experience since they were the lead in establishing the entire integrity plan system in Kosovo.

- Continuous public awareness – efforts should be made in any future projects to continue with raising public awareness to further increase the public's understanding regarding corruption and how to report it and how it is investigated. Additional efforts could be made to work at the local level.
- KALLXO.com – The ultimate aim should be for KALLXO.com to continue with the investigative journalism side of its role, while all reporting of corruption should ultimately be done through the APC, the police or the prosecution. The project should continue its efforts to try to find a sustainable solution for KALLXO.com, which has proven to be a highly effective model.

Next Steps:
- Develop concept notes and on areas requiring reinforcement and include in resource Mobilisation Strategy –*short-mid-term*

8. Lessons learned

Lesson 1: Prioritize sustainability from project inception: Initiatives must begin with an explicit focus on their sustainability post-project completion. This includes establishing clear institutional commitments for necessary resources, such as dedicated budgets and explicit authorities. The establishment of the ARO and the CEC Office to implement the Law on Financing of Political Entities highlighted the importance of government willingness as a significant indicator, but also revealed the gaps when such commitments are not solidified in institutional agendas.

Lesson 2: Phased approach to project implementation: SAEK's three-phase approach underpinned its success. Starting with awareness and prevention, moving to legislation, and culminating in policy implementation and sustainable asset recovery, each phase built on the previous one. This structured yet flexible approach allowed for adapting to the evolving project landscape and stakeholder needs, demonstrating the effectiveness of a phased strategy in complex governance environments.

Lesson 3: Comprehensive stakeholder coordination: Effective coordination among all levels of government and between various stakeholders was essential for seamless project implementation. The project's ability to engage and convene a wide range of stakeholders from police, to prosecution, to judges, to the judiciary academy, to the public, to parliament members ensured a holistic approach to anti-corruption efforts, demonstrating the value of comprehensive coordination in complex governance projects.

Lesson 4: Document and distribute lessons learned effectively: Systematically capturing and disseminating lessons learned is crucial for the continuity and improvement of future projects. This involves not just documenting lessons but also ensuring they are shared in accessible formats with all relevant parties, including future projects, institutions, and donors, as well as within UNDP, to facilitate knowledge transfer and application. SAEK conducted multiple activities to identify lessons and it captured those through meeting minutes, however, recording lessons in a tracker – to be categorised per intended users – would have ensured that lessons serve future initiatives.

Lesson 5: Foster open and effective communication with local stakeholders: Establishing and maintaining open, direct, and efficient communication with local stakeholders is crucial. This was evidenced by SAEK III staff's approachability, responsiveness and flexibility, which significantly enhanced stakeholder engagement and cooperation. Regular communication, whether written or verbal, and streamlined procedures, as acknowledged and valued by the stakeholders, significantly contributed to building trust and expediting collaborative efforts. This lesson underscores the importance of maintaining direct and efficient communication channels in project management.

Lesson 6: Embed gender equality and social inclusion (GESI) in core activities and strategies: Integrating principles of gender equality and social inclusion into the project's strategy and operations ensures a broader impact and compliance with international standards. Projects must not only incorporate these principles but also actively promote them through their activities and institutional partnerships. Given SAEK's scope of work and the sensitive and complex field and nature of anti-corruption, integrating GESI into initiatives was challenging, still the project ensured

to encourage higher participation of women in activities, conducted studies on this issue, and reminded national stakeholders to GESI mainstream their documents.

Lesson 7: Deliver comprehensive and proactive support: Effective project support should be systemic, strategic, and proactive rather than just logistical. Starting with comprehensive support can prevent future redundancies and enhance efficiency. For instance, SAEK III's support to writing the ARO regulation, encouraging institutions to assign representatives, facilitating meetings between stakeholders, supporting the logistics of organising meetings, and organising the ARO inauguration meeting, showcased how early and all-encompassing engagement leads to better outcomes and stakeholder buy-in. On the other hand, the logistical support for the development of the anti-corruption strategy was not sufficient, and more technical support since the beginning would have spared efforts at later stages and made the process more expeditive.

Lesson 8: Responsive and expedited support in project management: Institutions often face legal and bureaucratic barriers that hinder progress. SAEK's approach of minimizing bureaucratic delays and providing swift, effective support was highly valued. This strategy not only built trust but also fostered stronger relationships with stakeholders. The project's ability to expedite support, reducing process durations from months to weeks, demonstrated a model of efficient project management that others could replicate. This approach by UNDP and SAEK was particularly valued and contrasted with support provided by other international partners. To illustrate SAEK representatives met AMSCA representatives for the first time in January, they co-identified potential SAEK support to AMSCA that would be within the scope of work, and by mid-May they were about to publish the procurement notice. Another example is the swiftness with which SAEK developed the online assets registration system, which was up and running within six months from the passing of the Law.

Lesson 9: Integrated and contextual capacity building: Effective capacity building must integrate both theoretical and practical approaches, focusing on changing skills, mindsets, and behaviours to suit local legislation and cultural contexts. This involves employing multidisciplinary and context-specific training strategies that are engaging, practical, and inclusive of local languages and trainers to ensure maximum relevance and ownership among participants. For instance, collaboration with the Basel Institute and FOL Movement showcased how practical training sessions can be crucial in enhancing institutional capabilities. Moreover, embedding technical experts within institutions and providing on-the-job support by both local and international experts have proven vital in delivering training that is not only tailored to the local context but also robust and comprehensive. Such integrated approaches ensure that capacity building efforts are not only educational but also adaptable to the specific needs and nuances of the project environment, thereby promoting sustainable development and effective learning transfer. However, the transfer of lessons learned and higher sustainability could have been further ensured if APC representatives would have attended or led the 10 workshops with institutional representatives on writing Integrity Plans. Their involvement could have provided more direct input from a critical local regulatory body, enhancing the practical impact and sustainability of the training outcomes.

Lesson 10: Leveraging data for public accountability: The SAEK-supported GAP Institute platform that provided accessible budget data significantly impacted public engagement and accountability. This initiative not only improved transparency but also educated the public and

local organizations about governmental spending, leading to a more informed and engaged citizenry. It also led to the develop of more realistic budgets based on the citizen's needs. The project's approach to making complex data accessible and relevant to the public exemplified best practices in transparency and public engagement.

Lesson 11: Institutionalising new practices and platforms: The creation of platforms for political parties to report their donors and for wealth declaration as well as the support to establish the analysis office at the FIU demonstrated the project's success in institutionalizing new practices. These platforms have allowed stakeholder institutions to perform their roles more effectively, showcasing the importance of creating lasting tools that support transparency and accountability.

Lesson 12: Coordinated approaches with other donors: The project exemplified best practices in donor coordination, ensuring that international standards and best practices were integrated into local laws and policies. This collaborative approach prevented duplications and contradictions in project efforts, highlighting the importance of harmonized donor activities in achieving coherent project outcomes. For example, In the process of drafting and reviewing legal documents, the collaboration between the EUSR office and the UNDP SAEK project was crucial. Through the use of the Legal Review Mechanism (LRM), both entities ensured that proposals for draft laws were harmonized to present a coherent approach that aligned with international community standards. This proactive coordination helped avoid potential contradictions and duplications in the laws, thereby setting a standard for local stakeholders that reflected best practices and international norms.

Lesson 13: Maximizing the impact of board meetings: SAEK III's board meetings were crucial not only for administrative purposes but also for fostering relationships and exchanging ideas among national institutions. The non-technical, relationship-oriented nature of these meetings provided a sense of ownership and a platform for cooperation, enhancing accountability and ownership. By focusing on developing personal connections and exchanging ideas, these meetings proved more beneficial than traditional, report-centric gatherings. The streamlined structure in SAEK III, focusing on informing rather than approving, facilitated more effective and engaged discussions. Challenges should be a standard section for the board meetings, to allow opportunity to discuss challenges and jointly find solutions.

Lesson 14: Enhancing synergy between main implementers and subsidiaries: SAEK maintained regular interaction and meetings with donors and subsidiaries, however, it did not organise common meetings among implementers or between implementers and donors. Meetings between UNDP and the subsidiaries would have fostered synergy and could have enhanced project outcomes. Still, for the local organisations, the cooperation with UNDP influenced their practices. To illustrate, the focus on gender-responsive budgeting and green economy practices exemplified how aligning project goals with broader strategic objectives can lead to substantial improvements in project delivery and stakeholder engagement.

Annex I: The evaluation matrix

<table>
<tr><td colspan="7" align="center">ANNEX I - EVALUATION MATRIX</td></tr>
<tr>
<th>Relevant Evaluation criteria</th>
<th>Key Questions</th>
<th>Specific Sub-Questions</th>
<th>Data Sources</th>
<th>Data collection Methods/Tools</th>
<th>Indicators/ Success Standard</th>
<th>Methods for Data Analysis</th>
</tr>
<tr>
<td>The relevance of the project design, with a specific focus on its theory of change and how the three project outcomes realistically and effectively contributed to its overall objective</td>
<td>• To what extent was the project in line with the national development priorities, the Kosovo programme's outputs and outcomes, the UNDP Strategic Plan and the SDGs?
• To what extent did the project contribute to the theory of change for the relevant programme outcome?
• Has the project been relevant in terms of the needs and potentials/resources of the key stakeholders and beneficiaries? What were the main circumstantial factors considered in the project plans and</td>
<td>• Were any stakeholder inputs/concerns addressed at the project formulation stage?
• How does the project address the human development needs of intended beneficiaries?
• Was a stakeholder analysis conducted as part of the project development phase?
• What project revisions were made - if any - and why?
• Did the project's ToC clearly articulate assumptions about why the project approach is expected to produce the desired change? Was the theory of change</td>
<td>• National Development Strategy of Kosovo 2016-2021; National Development Strategy of Kosovo 2030; Kosovo Strategy on Role of Law 2021-2026; Anti-Corruption Strategy; sector strategies, action plans, and relevant reports
• SDC Strategy for Cooperation
• Strategy for Sweden's Reform Cooperation with Eastern Europe, the Western Balkans and Turkey for 2014-2020 & Strategy for Sweden's</td>
<td>• Document review and desk research
• Independent external research and reports
• Key informant interviews
• Focus group discussions
• Email, phone and online follow-up where necessary</td>
<td>N/A</td>
<td>• Qualitative and quantitative data analysis and disaggregation
• Data synthesis
• Descriptive statistical analysis
• Political economy analysis
• Contribution analysis
• Process tracing
• Triangulation
• Discussion of data amongst the evaluation team and the UNDP SAEK III project team</td>
</tr>
</table>

	implementation? • Was there sufficient local ownership demonstrated? • To what extent did the project contribute to gender equality, the empowerment of women and the human rights-based approach? • Have there been any changes in policies and strategy development that have affected the project? If yes, have necessary revisions and adaptations been designed? • What, if any, are the areas of relevance for future interventions in the target area?	grounded in evidence? • What analysis, in particular of the GESI/HRBA context and its political economy, was done in designing the project[32]? • Was the project able to adapt to evolving needs/changing context? • To what extent did it use adaptive management to maintain its relevance? • What is the level of acceptance for and support to the Project by relevant stakeholders? • How HRBA & GE mainstreaming principles were taken into account into project design and concretely and effectively	Reform Cooperation with the Western Balkans and Turkey for 2021-2027 • United Nations Kosovo Team Common Development Plan; UNDP Strategic Documents incl. UNDP Strategic Plan, UNDP Gender Equality Strategy, UNDP CPD • Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports • Relevant partner reports			• Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team

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[32] "Gender analysis should be applied at all levels, including planning, programming, budgeting, monitoring and evaluation"; 1997 ECOSOC Resolution on gender mainstreaming.

		implemented? • What project revisions were made – if any - and why, in response to changes in policies and strategy development? • What project revisions were made - if any - and why, in response to changes in policies and strategy development? • Was the project able to adapt to evolving needs/changing context? What areas of relevance are identified for future interventions?				
Effectiveness – The overall effectiveness of the implemented project activities towards the expected results	• To what extent did the project contribute to the country programme outcomes and outputs, the SDGs, the UNDP Strategic Plan and national development priorities? • Has the project been on track to achieve its	• What are the key internal and external factors that have contributed, affected, or impeded the achievements of alignment with country programme outcomes, SDGs, UNDP Strategic Plan, and national	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions • Email, phone and online follow-up	N/A	• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive statistical analysis

expected results? What has been achieved? • What challenges have been faced? What has been done to address the potential challenges/problems? • Has the project appropriately reached its target groups? Has the project served 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? • Have the expected results been clearly defined, both quantitatively and qualitatively, and have they been achieved with the	development priorities, and how have UNDP and the partners managed these factors? • To what extent have stakeholders been involved in project implementation, and how has their involvement influenced the project's ability to stay on track and achieve expected results? • In what ways did the Project come up with innovative measures for problem-solving to address the challenges faced? • To what extent is the project succeeding in fulfilling female and male beneficiaries' practical and strategic needs, including those of vulnerable groups, for inclusive access to justice and		where necessary	• Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team

	planned approach and resources? • How has the project implemented the commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability? • What factors have contributed to achieving or not achieving intended country programme outputs and outcomes? • What factors contributed to effectiveness or ineffectiveness? • Were the projects objectives and outputs clear, practical and feasible within its frame? • To what extent have stakeholders been involved in project implementation? • To what extent are	legal empowerment? • What good practices or successful experiences or transferable examples have been identified in the capacity development measures that serve the needs and demands of the stakeholders? • Were the projects objectives and outputs clear, practical, and feasible within its frame, and were the strategies used, particularly the HRBA and GEWE approaches, effective in the implementation of the project? • How effective were the strategies used in the implementation of the project to promote ownership, alignment, harmonization, management for development results, and mutual				

	project management and implementation adaptive and participatory and is this participation contributing towards achievement of the project objectives?	accountability? • In which areas does the project have the fewest achievements, what are the constraining factors, and how can or could they be overcome? • What are the key internal and external factors (success & failure factors) that have contributed, affected, or impeded the effectiveness of the project, and how have UNDP and the partners managed these factors? • To what extent have stakeholders been involved in project implementation? • To what extent did it use adaptive management to maintain its relevance and ensure participation is contributing towards the achievement of the project objectives?				

Outcome 1 - Policy, regulatory and monitoring framework on the prevention and suppression of corruption enhanced in a gender sensitive manner **Output 1.1** Policy and legal anti-corruption framework implemented in gender sensitive manner **Output 1.2** AC strategy 2020-2024 effectively implemented in gender sensitive manner **Output 1.3** Anti-	• To what extent did the project's activities contribute to the enhancement of the policy, regulatory, and monitoring framework on the prevention and suppression of corruption in a gender-sensitive manner? • Has the implementation of the Anti-corruption Strategy and Action Plan 2020-2024 been effective, and to what degree has it been influenced by the project's gender-sensitive approach? • How effectively is the development of the Anti-corruption Strategy and Action Plan 2024-2028 being carried out, and how is inclusivity and gender sensitivity being ensured in this process?	• How have the legislative drafting and support to public officials influenced the achievement of the project's outcomes in line with the UNCAC and AC Strategy? • What advancements have been made in developing assets' recovery guidelines, and how do these contribute to the overall anti-corruption framework? • How has the monitoring of sentencing guidelines affected the consistency and fairness of corruption-related sentences? • What impact has the monitoring of the 2020-2024 Anti-corruption Strategy and Action Plan had on the effectiveness of AC legislation?	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports • Relevant partner reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions • Email, phone and online follow-up where necessary	**Outcome 1** Indicator(s): # Anti-corruption laws, strategies developed Baseline(s): 0 Target(s): 3 Laws; 2 Strategies **Output 1.1** Indicator(s): 1.1.1 Number of anti-corruption policies and laws (bylaws, regulations, SOPs) adopted in line with the UNCAC and relevant international standards, and gender balanced by 2024 Baseline(s): 3 Target(s): 8 **Output 1.2** Indicator(s): 1.2.1 Percentage of measures implemented in	• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive statistical analysis • Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to

corruption Strategy and Action 2024-2028 developed in gender sensitive manner		• How has technical support to anti-corruption bodies and capacity building of municipalities improved the implementation of anti-corruption policies? • What have been the outcomes of the gender equality-related corruption risks and vulnerabilities survey, and how have these informed the project's approach? • How is the process for developing the 2024-2028 Anti-corruption Strategy and Action Plan ensuring participation from all relevant stakeholders, including women and marginalized groups?			gender sensitive manner, of the Action Plan of the Anti-Corruption Strategy 2020-2024 by 2023; 1.2.2 # Municipalities and local institutions adopt KACA integrity plans Baseline(s): 0 Target(s): 100%; 20 **Output 1.3** Indicator(s): 1.3.1 Anti-corruption Strategy and Action Plan 2024-2028 Baseline(s): 0 Target(s): 2	evaluation team
Outcome 2 – Anti-corruption institutions detect,	• How has the project enhanced the capacity of anti-corruption institutions to detect, repatriate hidden	• What strategies have been most effective in overcoming the challenges faced by	• Project Document; Project Progress Reports; Project Board meeting minutes;	• Document review and desk research • Independent external research and reports	**Outcome 2:** Indicator(s): Corruption charges issued	• Qualitative and quantitative data analysis and

repatriate hidden stolen assets and process corruption cases effectively **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	stolen assets, and effectively process corruption cases? • To what extent have anti-corruption institutions improved their tools and capacities to issue charges due to the project interventions? • How successful has the adjudication of corruption cases been following the project's support? • To what extent has awareness of rights and responsibilities on public transparency and accountability increased among citizens, with a focus on vulnerable women and marginalized groups?	these institutions, particularly in ensuring gender-responsive approaches within their operations? • How has specialized training impacted the abilities of public officials to implement corruption prevention measures? • What are the observed outcomes of the legal training provided to judges and prosecutors on assets recovery and economic crime? • In what ways have the trainings for private sector entities influenced their compliance with anti-money laundering requirements? • To what extent did the establishment of a Strategic Analysis Department and the development of a financial crime investigation toolkit	Project Financial Reports • Relevant partner reports	• Key informant interviews • Focus group discussions • Email, phone and online follow-up where necessary	Baseline(s): 1,247 cases, involving 2,319 persons (2018) Target(s): 25% increase by 2024 **Output 2.1:** Indicator(s): 2.1.1 Number of new cases issued on corruption charges; 2.1.2 Number of new cases issued on money laundering charges; 2.1.3 Number of individuals investigated through e-platforms; 2.1.4 Number of investigators, women and men, specialized in assets recovery investigative techniques; 2.1.5 Number of notarial cases registered to monitor potential	disaggregation • Data synthesis • Descriptive statistical analysis • Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team

accountability increased, with a focus on vulnerable women and marginalised groups		enhance the institutional capacity for anti-corruption efforts? • In what ways has the support provided to the CEC, political parties, and CSOs improved their transparency practices, particularly regarding political party financing and budget transparency at the municipal level? • Can you provide examples of corruption cases that have been successfully adjudicated due to the project's support, particularly through the Basel Institute on Governance's expertise? • What impact has the development of accredited courses and the establishment of policy support services within			corruption and enhance reporting Baseline(s): 1,247 cases, involving 2,319 persons; 6 cases, involving 12 persons; 20; 43; 0 Target(s): +50% on the 2018; 44 cases; 325; 200; All cases per relevant year. **Output 2.2:** Indicator(s): *2.2.1 Amount of preliminary assets confiscated; 2.2.2 Amount of final assets confiscated* Baseline(s): €28 million, €27,000 Target(s): +50% on the 2018; +50% on the 2018 **Output 2.3:** Indicator(s): 2.3.1 Number of irregularities	

		RoLAG had on the success rate of corruption case adjudications? • How effective has the monitoring of the "Economic Recovery Package" been in increasing public transparency and understanding among citizens? • What feedback has been received from the beneficiaries of the Notarial Case Management Platform, and how has this influenced their perception and action against corruption?			observed and found within the monitoring the transparency and allocation of the "Economic 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; 2.3.3 Number of policy papers and other studies published monitoring the public spending patterns; 2.3.4 Update of budgetary data in the GAP Platform <u>Baseline(s):</u> 0; 0; 0; 0 <u>Target(s):</u> 200; 200; 8; 16	
Outcome 3 – Civic engagement	• How effectively have civic engagement	• How has the Kallxo.com Research Unit contributed to	• Project Document; Project Progress Reports;	• Document review and desk research • Independent	**Outcome 3** <u>Indicator(s):</u> Cases of	• Qualitative and quantitative

mechanisms to hold institutions accountable strengthened

Output 3.1 Public institutions are more responsive and effective in resolving cases of corruption brought forth by the public through CSO | mechanisms been established and utilized to increase accountability of public institutions through initiatives on corruption reporting, referral, and monitoring?
• To what extent have these civic engagement mechanisms influenced public institutions to be more transparent and deter corruption in their decision-making processes? | managing information flow and coordinating follow-up activities with anti-corruption bodies?
• What has been the impact of the TV program "The Prosecutor" on public awareness and engagement in uncovering corruption cases?
• How has training investigators on public communication improved transparency and accountability of the investigations?
• What changes in awareness and behaviour have been observed among high school students as a result of the lectures on preventing corruption?
• What is the plan for sustaining the subscription server | Project Board meeting minutes; Project Financial Reports
• Relevant partner reports | external research and reports
• Key informant interviews
• Focus group discussions
• Email, phone and online follow-up where necessary | corruption identified, filed and convictions made widely public by kallxo.com
Baseline(s): 852 Cases (2018)
Target(s): 200% increase

Output 3.1
Indicator(s): 3.1.1 % of cases processed by Kallxo.com; 3.1.2 Number of sanctions (administrative and criminal) issued by relevant authorities by 2024; 3.1.3 Number of social media followers, disaggregated by gender,of Kallxo.com: 3.1.4 Number of high school female and male students | data analysis and disaggregation
• Data synthesis
• Descriptive statistical analysis
• Political economy analysis
• Contribution analysis
• Process tracing
• Triangulation
• Discussion of data amongst the evaluation team and the UNDP SAEK III project team
• Verification of data with stakeholders
• Fact checking by UNDP SAEK III, comment and feedback to evaluation team |

		for the kallxo.com platform after project completion?			(senior) reached during lectures; 3.1.5 Number of registered subscribers on the paid subscription platform Baseline(s): 27.3%; 64; 166,919 Facebook followers; 0; 0 Target(s): 30% (of the total cases); 80; +40% on 2018; 30 high school; 100	
Efficiency in delivering outcomes The cost efficiency of the implemented project activities towards the expected results	• Was the project management structure outlined in the project document efficient in generating the planned outputs? • To what extent the strategy and the project execution were efficient and cost-effective? • How well have the various activities transformed the available resources into the intended	• To what extent is the existing project management structure appropriate and efficient in generating the expected results? • Have the implementation modalities been appropriate and cost-effective? • Was there good coordination and communication between partners in the project?	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions • Email, phone and online follow-up where necessary	N/A	• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive statistical analysis • Political economy analysis • Contribution analysis

	results in terms of quantity, quality and timeliness? (in comparison to the plan) • Have the resources (funds, human resources, time, expertise, etc.) been allocated strategically to achieve results? • To what extent have project funds and activities been delivered in a timely manner? • How efficient were responsible partners toward contributing to the outcomes of the project?	• Was the project implemented within deadline and cost estimates? • What were the reasons for over or under expenditure within the Project? • Are the resources allocated sufficient/too much? • Is the project fully staffed, and are the staffing/management arrangements efficient? • Are procurements processed in a timely manner? • Did UNDP solve any implementation issues promptly? • To what extent were UNDP able to synergize with other UN agencies to ensure efficiency? • How often has the Project Board met?				• Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders Fact checking by UNDP SAEK III, comment and feedback to evaluation team
Sustainability of the project	• How has the project ensured sustainability of its results and impacts (i.e.	• To what extent are the project activities likely to be institutionalized and	• Sector strategies, action plans, and relevant reports • Project	• Document review and desk research • Independent external research	N/A	• Qualitative and quantitative data analysis

| The extent to which the positive effects of SAEK III endure beyond the project period | continuity of developed capacities, use of knowledge, improved practices, etc.)?
• How much has the project lead to a change of behaviours and motivations in terms of paying attention to marginalized and vulnerable population groups?
• Are there any financial, political or social risks that might jeopardize the sustainability of project outputs?
• Do the legal frameworks, policies and processes within which the project operates pose risks that may jeopardize sustainability of project benefits?
• To what extent do mechanisms, procedures and policies exist to allow primary stakeholders | implemented by the relevant institutions after the completion of this project?
• To what extent has the project created a shift in attitudinal and cultural behaviour towards inclusive access to justice and people-centred rule of law?
• Is there an exit strategy for the Project? Does it take into account political, financial, technical, and environmental factors?
• What are the key factors that will require attention to improve the prospects of sustainability of Project results?
• To what extent were sustainability considerations taken into account in the design and implementation of interventions?
• What is the level of | Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports
• Relevant partner reports | and reports
• Key informant interviews
• Focus group discussions
• Email, phone and online follow-up where necessary | | and disaggregation
• Data synthesis
• Descriptive statistical analysis
• Political economy analysis
• Contribution analysis
• Process tracing
• Triangulation
• Discussion of data amongst the evaluation team and the UNDP SAEK III project team
• Verification of data with stakeholders
• Fact checking by UNDP SAEK III, comment and feedback to evaluation team |

	to carry forward the results attained on gender equality, empowerment of women, human rights and human development? • To what extent do stakeholders support the project's long-term objectives? • Were the lessons learned documented by the project team on a continual basis and shared with appropriate parties who could learn from the project? • What could be done to have better exit strategies and sustainability? • Did implementing partners receive further support in assessing and identifying a business model that is not dependent on donor funds? • How far SAEK has progressed toward	national and sub-national ownership of the project activities? • To what extent are lessons learned being documented by the project team on a continual basis and shared with appropriate parties who could learn from the project? • Does the project provide for the handover of any activities? What could be done to improve exit strategies? • What are the perceived capacities of the relevant institutions for taking the initiatives forward? • To what extent do stakeholders support the project's long-term objectives and are involved in developing a clear exit strategy? • What is the level of				

					N/A	
	developing a clear exit strategy in a participatory manner? • Do public institutions like the Agency for Prevention of Corruption, police, prosecution etc. offer reliable channels for reporting corruption? • To what extent online platform such as "How does the state spend my money?" is sustainable or can be institutionalized?	national and sub-national ownership of project activities in the context of establishing reliable channels for reporting corruption? • What are the perceived capacities of the relevant institutions for taking the initiatives forward, such as the sustainability of the online platform?				
Stakeholders and Partnership Strategy	• Who are the major actors and partners involved in the project and how were their roles and interests? • Was the partnership strategy effective? • To what extent the project contributed to awareness raising and capacity development of the involved partners, the efficiency of partnerships developed and	• How were the roles and responsibilities of the key actors and partners defined to align with the project's objectives, and what strategies were implemented to manage their interests? • Can you provide examples of successful outcomes or milestones attributable to the	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports • Relevant partner reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions • Email, phone and online follow-up where necessary	N/A	• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive statistical analysis • Political economy analysis • Contribution

	implications on national ownership?	partnership strategy, indicating its effectiveness? • In what specific ways did the project facilitate capacity development among partners, and what measurable impact did this have on enhancing the efficiency and sustainability of the partnerships?				analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team
Evaluation	• Can the project be evaluated credibly? • Were intended results (outputs, outcomes) adequately defined, appropriate and stated in measurable terms, and are the results verifiable? • Were monitoring systems in place and how effective has it	• What methodologies or evaluation frameworks have been used to ensure that the project's evaluation is objective and reliable? • How were the project's intended results specified, and what measures were taken to ensure that	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports • Relevant partner reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions • Email, phone and online follow-up where necessary	N/A	• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive statistical analysis • Political economy

	been? • To what extent are the results at the outcome level attributable to the project actions?	they could be effectively measured and verified? • Can you detail the monitoring systems that were established for the project, and assess their effectiveness in tracking progress and identifying areas for improvement? • What methods have been used to determine the causality between the project's actions and the outcomes achieved?				analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team
Theory of Change or Results/Out come Map	• What are the underlying rationales and assumptions or theory that defines the relationships or chain of results that lead initiative strategies to intended outcomes? • What are the assumptions, factors or risks inherent in the	• Can you describe the core principles of the theory of change for the project, including how each initiative strategy was expected to lead to the intended outcomes? • What assumptions were made during the	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports • Relevant partner reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions • Email, phone and online follow-up	N/A	• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive statistical analysis

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	design that may influence whether the initiative succeeds or fails?	project design about the context, stakeholders, or resources, and how have these influenced the project's progress and success?		where necessary		• Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team
Human Rights	• To what extent have poor, people with disabilities and other disadvantaged and marginalized groups benefited from the work of the project?	• What measurable benefits and improvements have been realized by poor, people with disabilities, and other marginalized groups as a direct result of the project's	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports • Relevant partner reports	• Document review and desk research • Independent external research and reports • Key informant interviews • Focus group discussions		• Qualitative and quantitative data analysis and disaggregation • Data synthesis • Descriptive

		interventions?		• Email, phone and online follow-up where necessary		statistical analysis • Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team
Gender	• What effects were realized in terms of gender equality, if any? • Were women and men distinguished in terms of participation	• Can you identify and quantify the specific effects the project has had on gender equality? • How has the project differentiated	• Project Document; Project Progress Reports; Project Board meeting minutes; Project Financial Reports	• Document review and desk research • Independent external research and reports • Key informant interviews	N/A	• Qualitative and quantitative data analysis and disaggregation • Data

	and benefits within project? • To what extent has the project promoted positive changes in gender equality and the empowerment of women? • What were the follow up actions deriving from the Gender Corruption Risks and Vulnerabilities survey? • Was gender perspective included in the Integrity Plans?	between the participation and benefits of women and men, and what data supports this? • What evidence is there to demonstrate that the project has effectively promoted gender equality and women's empowerment? • What actions were taken in response to the findings of the Gender Corruption Risks and Vulnerabilities survey? • How was the gender perspective integrated into the Integrity Plans, and what impact has this integration had on the project outcomes?	• Relevant partner reports	• Focus group discussions • Email, phone and online follow-up where necessary		synthesis • Descriptive statistical analysis • Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team
Digitalisation	• Did the project introduce digital solutions as part of its work? • Did the applied	• What digital solutions were implemented by the project, and how were they expected to	• Project Document; Project Progress Reports; Project Board meeting minutes;	• Document review and desk research • Independent external research and reports	N/A	• Qualitative and quantitative data analysis and

	digital solution have the desired effect and were there any unintended effects (positive and negative)? • Are the capacities of responsible institutions sufficient for taking over the maintenance of the platform provided?	enhance project outcomes? • Can you evaluate the effectiveness of these digital solutions and report any unintended consequences they may have had? • How prepared are the responsible institutions to manage and maintain the digital platforms developed by the project?	Project Financial Reports • Relevant partner reports	• Key informant interviews • Focus group discussions • Email, phone and online follow-up where necessary		disaggregation • Data synthesis • Descriptive statistical analysis • Political economy analysis • Contribution analysis • Process tracing • Triangulation • Discussion of data amongst the evaluation team and the UNDP SAEK III project team • Verification of data with stakeholders • Fact checking by UNDP SAEK III, comment and feedback to evaluation team

Annex II: Informed Consent Protocol and Data Collection Tools and Instruments

2.1 Informed Consent Protocol

Date: _____Time: Start_____End_____

Name: _____ Position: _____

Location: _____ Male ___ Female _____

Confidentiality and Informed Consent Statements: Thank you for taking the time to meet with us. We are a team of external evaluators including Joanna Brooks (International Evaluation Specialist) and Jeta Pajaziti Doli (Local Evaluation Specialist). We are conducting an independent final evaluation of the **Support to Anti-Corruption Efforts in Kosovo project (SAEK III)** We have been hired by UNDP for this assignment but are not employees of UNDP and are independent from both UNDP and the project. All information shared will be kept confidential and anonymous. We will aggregate and present our findings from interviews in a way that cannot be tied back to any individual or organization. Therefore, please feel free to speak openly and candidly with us.

Your participation is voluntary. Please feel free to ask to skip any question that you do not feel comfortable answering or ending the interview at any point. In terms of use, we will produce a draft evaluation report following our fieldwork which will be shared with UNDP stakeholders for their comments. We will then revise and finalize the draft based on the comments received. UNDP Kosovo will be responsible for the circulation of the report.

Thank you again for your willingness to participate in this interview. Do you have any questions before we get started?

2.2 Key Informant Interview Guides

KIIs Guide for UNDP and SAEK III Project Staff

Introduction
- For UNDP and project staff – please describe your role in the SAEK III project and for how long you have been involved in the project.

Relevance:
- How closely did the project align with national development priorities, and how did it address the UNDP Strategic Plan and the SDGs?
- What factors influenced the project's design to meet the needs and utilize the resources of key stakeholders?
- Can you provide specific examples of how the project promoted local ownership, gender equality, and a human rights-based approach?
- Were any changes in policies or strategic development during the project cycle addressed through revisions in the project's approach?

Effectiveness:

- What were the most significant accomplishments of the project concerning the country programme outcomes, and what has been the progress towards the SDGs?
- How have you measured the project's progress against expected results, and how have you addressed challenges encountered during implementation?
- Could you illustrate how the project reached and served its target groups, including vulnerable populations?
- What measures have been taken to ensure that the acquired knowledge and skills have been institutionalized by the stakeholders?

Efficiency:
- How did the project management structure contribute to the efficiency of output generation?
- Evaluate the strategy and execution of the project in terms of efficiency and cost-effectiveness, particularly how activities have translated resources into results.
- Discuss the strategic allocation of resources like funds, human resources, and expertise, and the role of responsible partners in contributing to the project's outcomes.

Sustainability:
- What strategies has the project employed to ensure the sustainability of its impacts, especially regarding capacity development and continued practice improvements?
- How has the project prepared to mitigate potential financial, political, or social risks to the sustainability of its outputs?
- How are the project's long-term objectives supported by stakeholders, and how are lessons learned being documented and applied?

Stakeholders and Partnership Strategy:
- Identify the major partners involved in the project and their roles. How effective was the partnership strategy in terms of capacity building and national ownership?

Theory of Change or Results/Outcome Map:
- Explain the rationale behind the project's theory of change and how assumptions and risks were managed to navigate towards intended outcomes.

Cross-cutting themes:
Human Rights:
- To what extent have poor, people with disabilities and other disadvantaged and marginalized groups benefited from the work of the project?

Gender:
- What specific outcomes related to gender equality have been observed?
- How were gender distinctions managed in terms of project participation and benefits?
- In what ways has the project brought about positive changes in gender equality and women's empowerment?
- What follow-up actions have been taken as a result of the Gender Corruption Risks and Vulnerabilities survey?
- How was the gender perspective integrated into the Integrity Plans?

Digitalisation:
- How has the project incorporated digital solutions, and what effects have these had?
- Are the capacities of the institutions responsible for maintaining the platform sufficient, and how can this be improved?

Do you have any comments, recommendations or inputs regarding the better implementation of the project activities?

Thank the participant

KIIs Guide for SDC and Sida representatives

Introduction
- Please outline your organization's role and contributions to the SAEK III project. How long has your organisation been involved, and what are the main objectives from your perspective?

Relevance:
- In your view, how did the SAEK III project align with Kosovo's national development priorities and the broader goals of your organisation?
- Could you discuss the extent to which the project's contributions have been in line with the existing theory of change for the targeted programme outcomes?
- From a donor perspective, were the needs and resources of key stakeholders adequately considered in the project planning and execution?
- How have you perceived the demonstration of local ownership within the project, and what significance does this hold for its relevance?
- Can you detail how the project has advanced gender equality and women's empowerment and whether you've seen evidence of a human rights-based approach in action?
- Have any policy or strategic developments during the project timeline necessitated adaptations, and if so, how have these been managed?

Effectiveness:
- How would you evaluate the project's effectiveness in contributing to the expected country programme outcomes, SDGs, and alignment with national priorities?
- Could you describe the project's achievements and whether it has stayed on course to fulfil its anticipated results?
- What challenges have emerged, and what interventions have been made to tackle these?
- Has the project effectively targeted and met the needs of vulnerable groups, and how have capacity development measures been implemented to serve the stakeholders?

Efficiency:
- From your perspective, was the project management structure as outlined in the project document successful in generating the intended outputs efficiently?
- How do you assess the cost-effectiveness of the project strategy and execution, especially in terms of transforming resources into the intended results?

- Can you comment on the timeliness and strategic allocation of resources in achieving the project's results, and how have responsible partners fared in contributing to this efficiency?

Sustainability:
- What sustainability measures do you believe the project successfully implemented, and what are the observed or potential risks to the sustainability of project outputs?
- How do you view the support from stakeholders for the project's long-term objectives, and to what extent have the lessons learned been documented and utilized for future planning?
- In terms of exit strategies, what suggestions do you have for enhancing sustainability, and how have implementing partners been supported in developing self-sufficient business models?

Stakeholders and Partnership Strategy:
- Could you identify the key actors and partners in the project and explain the effectiveness of the partnership strategy in fostering national ownership and capacity building?
- What impact do you believe the project had on raising awareness among involved partners, and how has it influenced the efficiency of the partnerships developed?

Theory of Change or Results/Outcome Map:
- What, in your opinion, are the underlying rationales, assumptions, or theories that have shaped the project's strategies and intended outcomes?
- Are there any design factors or inherent risks that you believe may influence the success or failure of the initiative?

Cross-cutting themes:
Human Rights:
- From a donor perspective, how have disadvantaged and marginalized groups, including the poor and people with disabilities, benefited from the project's work?

Gender:
- What effects on gender equality have you noted as a result of the project, and how has the project managed distinctions in participation and benefits between women and men?
- What positive changes in gender equality and the empowerment of women have been promoted by the project, and what follow-up actions have been initiated from gender-related surveys?

Digitalisation:
- How has the introduction of digital solutions by the project shaped your view of its innovation, and have these solutions had the desired effect?
- Do you feel the capacities of the responsible institutions are sufficient to maintain the provided platforms, and what improvements can be made?

Do you have any comments, recommendations or inputs regarding the better implementation of the project activities?

KIIs Guide for Institutional Stakeholders

Introduction
- To begin, please tell me a little about your familiarity with / understanding of the ***Support to Anti-Corruption Efforts in Kosovo (SAEK) Project – Phase III***. Overall, what is it trying to achieve, what was the extent of consultation with your institution/the government?
- What was your/your organization role in the project? Can you mention the activities that you/your organization involved in? When did you begin cooperating with UNDP SAEK III and in which area(s)?
- What aspects of the project's work are you most familiar with?

Relevance:
- How does the SAEK III project align with your institution's mandate and the national development priorities it aims to address?
- In your institution's experience, to what extent has the project been shaped by the needs and potentials of the key stakeholders it is meant to serve?
- Could you provide examples of how local ownership has been fostered through the project, and how has it supported the goals of gender equality and a human rights-based approach?
- Have there been any policy or strategic shifts that impacted the project's direction, and how has your institution adapted to these changes?

Effectiveness:
- Assess the project's contributions to the outcomes and outputs of the country programme and its alignment with SDGs and national priorities from your institutional perspective.
- Can you discuss the project's achievements and the degree to which it is on track to realize its expected results?
- What challenges has your institution observed, and what solutions have been implemented to address them?
- How effectively has the project reached and served its target groups, including vulnerable populations, in your view?

Efficiency:
- From the standpoint of your institution, was the project's management structure effective in generating the anticipated outputs?
- How do you rate the strategy and execution of the project in terms of its efficiency and cost-effectiveness?
- Discuss the allocation of resources in terms of achieving the project's goals, and how have responsible partners contributed to this aspect?

Sustainability:
- What measures do you consider have been put in place by the project to ensure the sustainability of its results and impacts?
- How has the project influenced a change in behaviours and motivations regarding marginalized and vulnerable groups from the perspective of your institution?
- Are there any risks that your institution identifies as potentially jeopardizing the sustainability of the project's outputs?

Stakeholders and Partnership Strategy:

- How would you describe the role and effectiveness of the key actors and partners involved in the project, particularly concerning capacity building and national ownership?
- To what extent has the project contributed to awareness raising among the institutional partners involved?

Cross-cutting themes:
Human Rights:
- To what extent have your institution's objectives related to human rights been supported by the project's work?

Gender:
- What are the observed outcomes in terms of gender equality, and how has the project supported or enhanced the gender-focused objectives of your institution?
- Discuss any follow-up actions that have been taken or planned as a result of gender-related findings in the project.

Digitalisation:
- How has the introduction of digital solutions in the project aligned with the digitalisation goals or plans of your institution?
- Evaluate the capacities of the institutions responsible for maintaining the platforms or solutions provided by the project, and suggest any areas for improvement.

Do you have any comments, recommendation or inputs regarding the better implementation of the project activities?

Thank the participant

KIIs guide for Interviews with CSOs
Introduction
- Please describe your organization's specific role and involvement in the SAEK III project, including the duration and main objectives of your participation.

Relevance:
- How does the SAEK III project align with your organization's mission and the priorities of the communities you serve?
- Could you provide examples of how the project addressed the actual needs and potentials of stakeholders, particularly in the areas your organization focuses on?
- Discuss the extent to which your organization has witnessed or contributed to local ownership within the project and its support of gender equality and human rights.

Effectiveness:
- From your organization's perspective, what significant contributions has the project made to the intended country programme outcomes and the SDGs?
- Please discuss the progress towards achieving the expected results and any milestones that your organization has helped to achieve.

- What obstacles has your organization encountered in the project, and how have you addressed them?
- How has your organization ensured that the project's target groups, especially vulnerable ones, have been reached and served?

Efficiency:
- Evaluate the efficiency of the project management structure as experienced by your organization in generating the intended outputs.
- Reflect on the cost-effectiveness of the project strategy and the transformation of resources into results. How has your organization contributed to or benefited from this efficiency?

Sustainability:
- What strategies or actions has your organization implemented, in partnership with SAEK III, to ensure the sustainability of project impacts?
- Describe any financial, political, or social risks you foresee that might threaten the sustainability of the project's outputs and how you are addressing them.
- To what extent does your organization support the project's long-term objectives, and how are lessons learned being documented for future use?

Stakeholders and Partnership Strategy:
- Identify and describe the roles of key actors and partners your organization has engaged with within the project. How effective do you believe the partnership strategy has been?
- What impact has the project had on raising awareness and developing capacities among the partners you work with?

Cross-cutting themes:
Human Rights:
- Share how the project has impacted the human rights landscape according to your organization's experience and the groups you work with.

Gender:
- Discuss any observed changes in gender equality and the empowerment of women as a result of the project. How has your organization contributed to or benefitted from these changes?
- What actions have followed the gender-focused surveys or assessments within the project?

Digitalisation:
- How has your organization adapted or contributed to the digital solutions introduced by the project? What effects, both intended and unintended, have you observed?
- Assess the capabilities of the relevant institutions, including your own, to maintain and carry forward the digital platforms or solutions provided by the project.

Do you have any comments, recommendations or inputs regarding the better implementation of the project activities?

Thank the participant

Annex III: List of individuals or groups interviewed or consulted

Participants	Position	Institution	Sex
Albert Avdiu	Consultant	UNDP SAEK III	M
Albulena Sadiku	Deputy Director	Internews Kosova / BIRN	W
Ardian Nikolla	Chief of Staff	Office of the Chief Prosecutor	M
Bahri Hyseni	Head of ARO	Asset Recovery Office (ARO)	M
Behar Xhema	Acting Director	Financial Intelligence Unit (FIU)	M
Berat Thaqi	National Programme Officer	Swiss Agency for Development and Cooperation (SDC)	M
Besim Kelmendi	Acting Chief Prosecutor	Office of the Chief State Prosecutor (OCSP)	M
Besnik Buzhala	Director	Office of Political Parties, Central Election Committee (CEC)	M
Besnik Veseli	Tax Analyst	Tax Investigations Department, Financial Intelligence Unit, Tax Administration of Kosovo (TAK)	M
Blendi Hasaj	Executive Director	GAP Institute	M
Constantine Palicarsky	Crime Prevention and Criminal Justice Officer	Thematic Support Section, Corruption and Economic Crime Branch, United Nations Office on Drugs and Crime (UNODC)	M
Daniel Eric Stonecipher	BASEL Expert in Kosovo	Basel Institute on Governance	M
Driton Morina	Financial Officer	UNDP SAEK III	M
Enver Krasniqi	Acting Director	The Agency for the Management of Confiscated and Seized Assets (AMSCA)	M
Faik Ispahiu	Founder & Director	Internews Kosova	M
Fjolla Raifi Luzha	Project Manager	UNDP SAEK III	W
Flakrina Osmani	Director	Rule of Law Advisory Group (ROLAG)	W
Florent Emini	Legal Officer	Rule of Law Advisory Group (ROLAG)	M
Hugo Lascão	Legal Adviser (between 04 May 2020 and 01 May 2023)	Rule of Law Department in EUSR Kosovo	M
Jarmo Helppikangas	Head	Rule of Law Department in EUSR Kosovo	M

Jeton Dragusha	Deputy Director	Tax Investigations Department, Financial Intelligence Unit, Tax Administration of Kosovo (TAK)	M
John Hanley	Resident Legal Advisor	DOJ/OPDAT US Embassy	M
Kreshnik Gashi	Managing Director	Internews Kosova	M
Kreshnik Radoniqi	Chairman	Central Election Committee (CEC)	M
Kujtim Munishi	Trainer, Prosecutor	Kosovo Justice Academy (KJA)	M
Marta Gazideda	Governance and Peacebuilding Portfolio Manager/Deputy	United Nations Development Programme (UNDP)	W
Mato Meyer	Chief Technical Adviser, Anti-corruption	UNDP SAEK III	M
Mexhide Demolli	Director	FOL Movement	W
Mirnije Stublla	Programme Manager	Swedish International Development Agency (Sida)	W
Naim Abazi	Special Prosecutor	The Special Prosecution of the Republic of Kosovo (SPRK)	M
Nazlie Bala	Legal Adviser	Ministry of Justice (MoJ)	W
Nora Bajrami	Program Manager	FOL Movement	W
Nora Jashari	External Associate	GAP Institute	W
Nuno Queiros	Resident Representative for Kosovo	United Nations Development Programme (UNDP)	M
Peter Wilson	Program Office	Basel Institute on Governance	M
Phyllis Atkinson	Senior Asset Recovery Advisor International Centre for Asset Recovery	Basel Institute on Governance	W
Rrezearta Reka	Rule of Law Advisor	UNDP SAEK III	W
Tea Blakaj Hoxha	Adviser to OPM	Office of the Prime Minister (OPM)	W
Valbona Bogujevci	Assistant Resident Representative and Programme Coordinator	United Nations Development Programme (UNDP)	W
Yll Buleshkaj	Director	Agency for the Prevention of Corruption (APC)	M

Annex IV: List of supporting documents reviewed

1. Anti-Corruption Strategy 2021-2023, Republic of Kosovo
2. Country Programme Document – Serbia – 2021-2025 results and resources framework for Kosovo** under Security Council resolution 1244 (1999)
3. Gender Specific Corruption Risks and Vulnerabilities, UNDP, July 2021
4. National Development Strategy 2016-2021, Republic of Kosovo
5. National Development Strategy 2030, Republic of Kosovo
6. Policy Paper on Corruption and Vulnerable Groups, UNDP, June 2020
7. Project Document – UNDP KOSOVO: SAEK III
8. Public Pulse Brief XXV, UNDP
9. Results strategy for Sweden's reform cooperation with Eastern Europe, the Western Balkans and Turkey 2014-2020
10. SAEK III Narrative Progress Report July 2020 – June 2021
11. SAEK III Narrative Progress Report July 2021 – June 2022
12. SAEK III Narrative Progress Report January – December 2022
13. SAEK III Narrative Progress Report January – December 2023
14. SAEK III Financial Report July 2020 – June 2021
15. SAEK III Financial Report July 2021 – December 2021
16. SAEK III Financial January – December 2022
17. SAEK III Financial Report January – December 2023
18. SAEK III Project Board Meeting Minutes (23.02.2021, 28.09.2021, 04.03.2022, 14.10.2022, 04.05.2023, 21.11, 2023)
19. Strategy for Sweden's global development cooperation on sustainable economic development 2022-2026
20. Strategy for Sweden's Reform Cooperation with Eastern Europe, the Western Balkans and Turkey for 2014-2020
21. Strategy for Sweden's Reform Cooperation with the Western Balkans and Turkey for 2021-2027
22. Strategy on Rule of Law 2021-2026, Republic of Kosovo
23. Swiss Cooperation Programme Kosovo 2017-2020
24. Swiss Cooperation Programme Kosovo 2022-2025
25. Switzerland's International Cooperation Strategy 2021-2024
26. UNDP Gender Equality Strategy 2022-2025
27. UNDP Strategic Plan 2018-2021
28. UNDP Strategi Plan 2022-2025

Annex V: Project results framework and progress towards targets

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
CPD Output 1.1.6: Kosovo anti-corruption institutions are able to monitor, prevent and fight corruption at central and municipal level **Result:** The strengthened legal mandate of the Agency for the Prevention of Corruption has given the body the authority to directly issue sanctions for violations, while the digital solution Public Officials' Assets and Income Declaration database has vastly improved its monitoring capabilities. The legally mandated Integrity Plan system now covers all municipal level public bodies and has improved both monitoring and development of corruption mitigation measures at both municipal and central levels. The Tax Administration's Wealth Discrepancy Database generates intelligence reports on physical and legal entities suspected of financial crime.
CPD Output 1.2.1: CSOs have increased capacity in seeking accountability and transparency on fight against corruption **Result** The creation of digital solutions for political party financing and public officials' assets and income declarations gives CSOs and the public transparent access to records that are used for seeking accountability of public officials. The kallxo.com corruption reporting platform has resulted in sanctions against judges and prosecutors and informed the public of grand corruption cases. The Supreme Court's Sentencing Guidelines for Corruption Offenses allows CSOs to monitor court cases and report on adherence or divergence to the guidelines that could indicate possible unethical behaviour, corruption or capacity development needs for the judiciary.
UNDP Results and Resources Framework for Kosovo:
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
Result: The overhaul of Kosovo's anti-corruption legal framework has resulted in strengthened mandates of key institutions (the Agency for the Prevention of Corruption, the Central Election Commission) and more effective sanctioning authority. Digital platforms for public officials' assets and income declarations (APC) and the database for financing of political entities (CEC) have made anti-corruption efforts more transparent and accessible to the public. Kosovo has also established new departments and offices that perform vital anti-corruption functions: the Asset Recovery Office (within the prosecution); the Strategic Analysis Division (within the Financial Intelligence Unit; the Office for Registration and Monitoring of Political Party Financing (within the CEC); Divisions for Corruption Proofing of Legislation, Integrity Plans (within the APC).
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.
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
Outcome 1 Result: *Kosovo's anti-corruption legal and policy framework has been completed. Throughout the duration of the project, eight laws and bylaws were adopted pertaining to key anti-corruption laws including the Law on the Agency for the Prevention of Corruption, the Law on Public Officials' Assets and Income Declarations and the Law on Financing of Political Entities. Due to political instability one Anti-corruption Strategy was developed and is pending adoption.*

			BASELINE	TARGETS & RESULTS (by frequency of data collection)		

EXPECTED OUTPUTS	OUTPUT INDICATORS	DATA SOURCE	Value	Year	Y1	Y1 Result (July 2020 - June 2021)	Y2	Y2 Result (July 2021 - June 2022 & January - December 2022)	Y3	Y3 Result (January - December 2023)	Y4	Y4 Results (January - December 2024)	FINAL TARGET	FINAL RESULT	DATA COLLECTION METHODS & RISKS
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 international standards, and gender balanced by 2024*	*Official gazette and internal reports*	3	2019	2	1 draft law and 1 strategy were adopted by the Government but not by the Assembly	2	4 laws adopted by the Assembly & 1 concept document	2	2 laws have been adopted, and 8 bylaws and methodologies approved by relevant institutions.	2	2 bylaws adopted. 4 bylaws under development	8	8 adopted and 4 pending till the end of the project Achieved – by end of project will be over-achieved by 4	*Based on the 2019 UNCAC GAP Assessment, EU Annual Reports, KACA reports adopted and pending anti-corruption legislation will be evaluated against the 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	*1.2.1 Percentage of measures implemented in gender sensitive manner, of the Action Plan of*	*Report of the Kosovo Anti-Corruption Agency*	0	2019	25%	N/a	25%	N/a	25%	N/a	25%	N/A due to political instability, the NACS was never adopted	100%	0% to date as the NACS was not adopted	*The online tool for monitoring the implementation of the AC Strategy will*

gender sensitive manner	*the Anti-Corruption Strategy 2020-2024 by 2023*													*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	N/A (the legislation was not adopted)	5	N/A (the legislation was not adopted)	5	120 public institutions have developed and adopted the integrity plans	5	120 integrity plans	20	120 to date, with the number expected to increase. The overachievement of the target is due to the legislative changes requiring all public institutions to complete integrity plans as well as the speedy adoption of the methodology by the APC.	*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	N/a	0	N/a	0	N/a	1	N/A the NACS is set to be adopted end of June 2024	2	1 the NACS has been developed and is pending adoption	*Governmental decision on adoption of the NACS and Action Plan.*
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														

Outcome 2 Result: *Anti-corruption institutions have succeeded in exponentially increasing stolen asset recovery, with the final year figures for preliminary assets confiscated at 324% annual increase and final assets confiscated at 3423% annual increase. The number of subjects investigated through e-platforms has steadily grown and is now part of regular investigative procedures. The number of money laundering cases has grown each year, however the number of indictments on corruption charges has been erratic. This may indicate a focus on high level grand corruption cases as a strategic priority.*															
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	325 cases, involving 335 persons	2018	+5% on the previous year	147 indictments or 55% decrease in the number of indictments	+10% on the previous year	236 indictments or 61% increase in the number of indictments	+15% on the previous year	112 indictments or 53% decrease in the number of indictments	+20% on the previous year	Figure not available yet	+50% on	Total number of indictments lower than baseline, however qualitative improvement in terms of grand corruption values and level of officials indicted.	*Data on court cases and issued indictments are issued by the relevant courts and prosecution offices regularly..*
	2.1.2 Number of new cases issued on money laundering charges	*Court and prosecution records*	158 cases	2018	8 cases	158 cases sent by the FIU to Special Prosecution in 2020	10 cases	263 cases sent by the FIU to the Special Prosecution in 2021	12 cases	289 cases on money laundering charges initiated by the FIU.	14 cases	27 cases to date, complete figure not available yet	44 cases	Total number of cases to date are 737 which exceeds the target of 44 cases. The increase is due in large part to improved anti-money laundering measures by the FIU.	*Ibid.*
	2.1.3 Number of individuals investigated through e-platforms	*Internal reports from the Prosection, FIU, KACA*	20	2018	50	1,124 persons were analysed/investigated by the FIU through electronic platform. 7,550 cases generated through the Tax Administration Wealth Discrepancy Database.	75	178 subjects analysed by the FIU. 7,590 cases generated through the Tax Administration Wealth Discrepancy Database.	100	154 subjects analysed by the FIU. 11,689 cases generated through the Tax Administration Wealth Discrepancy Database.	100	42 subjects analysed by the FIU to date. TAK data not yet available.	325	1,498 FIU internal reports were generated and 26,829 TAK financial discrepancy reports were generated – outperforming the target of 325 reports. Significantly exceeded the	*The Prosecution, TAK, FIU and KACA have records of cases initiated through their respective online platforms and can provide this information*

												targets with both TAK and the FIU generating intelligence reports and analysing subjects through digital platforms regularly. Both the FIU's e-investigation capabilities and the SAEK developed TAK e-platform outperformed the target with advanced search and red flag indicator functions.	*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	16 investigators specialized in 2020 compared to 20 in 2019	50	1 training delivered on cryptocurrency money laundering for 20 investigators who were introduced with investigative techniques to trace criminal proceeds laundered through cryptocurrency vehicles.	50	ToT completed and handed over the Judicial Academy. Two five-day trainings completed by the local trainers through the AoJ for 70 participants.	50	Judicial Academy has independently conducted one five-day training for 20 investigators	200	126 investigators were specialized which is under the set target of 200, however sustainable training through the Judicial Academy has been assured.	*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	N/a	All cases per relevant year	N/a	*15%o n the previ ous year*	N/a	All cases per releva nt year	Platform set to be completed by the end of the project.	All cases per relevant year.	N/A platform not yet operational	*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 adjudicati on of corruptio n cases	*2.2.1 Amount of preliminary assets frozen/sequestra ted*	*EU Annual Report, Court and prosecut ion records*	28 millio n	2018	5% on the previous year	118% increase of the amount of preliminary assets frozen/sequestra ted in 2020 compared to 2019, or 19,182,157.00 € in 2020 compared to 8,787,307.63 € in 2019	10% on the previ ous year	35% decrease of the amount of preliminary assets frozen/seques trated in 2021 compared to 2020, or 14,238,163 € in 2021 compared to 19,182,157.0 0 € in 2020	10% on the previ ous year	46% increase of the amount of preliminary assets frozen/seques trated in 2022 compared to 2021, or 20,728,965 in 2022 compared to 14,238,163 in 2021	20% on the previ ous year	324% increase of the amount of preliminary assets frozen/seques trated in 2023 compared to 2022, or 87,847,342 EUR in 2023 compared to 20,728,965 EUR in 2022	50% on the previous year	There has been an exponential increase in the amount of preliminary assets frozen/seques trated since the beginning of the project. However, the figures dropped for 2020-21 which correlates in the drop in figures of cases for this year – both of which could be attributed to the COVID-19 pandemic.	*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.*

	2.2.2 Amount of final assets confiscated	EU Annual Report, Court and prosecution records	€ 49 000	2018	5% on the previous year	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	10% on the previous year	62% increase of the amount of final assets confiscated in 2021 compared to 2020, or 772,819 EUR final assets confiscated in 2021, compared to 476,490.00 € in 2020.	15% on the previous year	13% decrease of the amount of final assets confiscated in 2022 compared to 2021, or 669,765 EUR final assets confiscated in 2022, compared to 772,819 € in 2021.	20% on the previous year	3423% increase of the amount of final assets confiscated in 2023 compared to 2022, or 23,594,635 EUR final assets confiscated in 2023, compared to 669,765 EUR in 2022.	50% on 2018	After slow progress for the first two years, the increase in 2023 and the prognosis for 2024 show an enormous increase, well exceeding the target set.	Ibid.
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"; Number of infographics/reports/on monitoring the transparency of the economic revival package	Project Reports	0	200	100	12 irregularities/categories identified by GAP Institute in the Economic Recovery Package	100	After the first year of analysing and identifying irregularities, the GAP Institute continued to monitor the transparency of the allocation of the Economic Recovery Package, by publishing infographics. For the reporting, period, 2 infographics were published	2	2 infographics published	N/A no further reports planned.	1 report; 4 infographics	1 report; 4 infographics. The GAP Institute stopped reporting irregularities after the first year of the project	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	28 applicants/students applications for the best essays in the field of public finance as a part of International Anti-corruption Day in 2020	50	A total of 27 students applied with essays on topics: "Digitalizatio n of public services and corruption", and "Energy	50	19 applications for the best essay as a part of International Anti- corruption Day by 2021.	50	Although the total number of applicants has decreased, there has been a strong core interest in the competition and high	50	74 student applications in total.	GAP Institute shall organize the Award for the best essays in the field of public finance as a part of

							sustainability in Kosovo"				quality of submissions.				*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 studies published monitoring the public spending patterns	*Project Report*	0	8	2	2 policy papers/studies and 4 articles published by GAP Institute	2	2 reports and infographics were published	2	2 policy reports and infographics were published on Capital Investment Distribution	2	The target has been met.	8	8 reports in total	*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*	0	16	4	GAP Institute has updated three times the platform during 2021	4	Updates and visualization of budget transparency index completed	4	Updates and visualization of budget transparency index completed	4	The target has been met.	4	4 per year	*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.

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*	*27,30 %*	*October 2017-December 2018*	30%	1,739 cases were verified/processed by KALLXO.com or 59,96% in 2019 while 868 were verified/processed by KALLXO.com or 54.86% in 2020.	30%	More than 85% of cases processed by kallxo.com, after the following actions: 1,950 reports received. 1,657 reports verified. 400 follow-up letters submitted to institutions	30%	More than 80% of cases processed by KALLXO.com, after the following actions: 1,748 reports verified.	30%	The target has been met.	30% (of the total cases)	Up to the end of 2023, 12,286 cases were filed; out of which, 9,083 were followed-up to relevant institutions. This resulted in the following sanctions: Arrests: 20 police officers, 20 business owners; Disciplinary procedures: 18 judges and prosecutors; 5 Tax Administration officials, 20 public officials for conflicts of interest Indictments: 20 municipal officials, 2 ministers, 1	*Kallxo.com reports on the progress of all cases regularly.*

													judge, 5 officials of public enterprises, 19 police officers (out of which 13 were convicted) Tax violations: 100 businesses Money laundering charges: 17 people Failure to declare assets and income: 20 public officials	
	3.1.2 number of sanctions (administrative and criminal) issued by relevant authorities by 2024	*Kallxo reports*	64	*October 2017- December 2018*	20	During 2019, disciplinary procedures were requested against 10 judges and prosecutors where five sanctions were issued while in 2020 six cases were requested, where have been initiated, one ceased, one rejected whereas two are under procedure.	20	65 legal complaints filed	20	4 judges were sentenced with disciplinary measures.	20	The target has been met.	80	147 public officials were sanctioned, exceeding the target of 80. Up to the end of 2023, 12,286 cases were filed; out of which, 9,083 were followed-up to relevant institutions. This resulted in the following sanctions: Arrests: 20 police officers, 20 business owners; Disciplinary procedures: 18 judges and	*Ibid.*

												prosecutors; 5 Tax Administration officials, 20 public officials for conflicts of interest Indictments: 20 municipal officials, 2 ministers, 1 judge, 5 officials of public enterprises, 19 police officers (out of which 13 were convicted) Tax violations: 100 businesses Money laundering charges: 17 people Failure to declare assets and income: 20 public officials	
3.1.3 Number of social media followers, disaggregated by gender, of Kallxo.com	*Kallxo reports*	*166,919 Facebook followers*	*2018*	10% increase from the previous year	355,574 followers on its official Facebook page and 21,800 YouTube subscribers, an increase of 109,943 Facebook followers and 4,200 YouTube subscribers	10% increase from the previous year	KALLXO.com has a total of 477,137 Facebook followers, 34,800 YouTube subscribers, and a total of 33,300 followers on Instagram	10% increase from the previous year	KALLXO.com has a total of 477,137 Facebook followers, 34,800 YouTube subscribers, and a total of 33,300 followers on Instagram. All this data shows the continuation of an	10% increase from the previous year	Steady increase in the number of followers annually and from the baseline till today.	Data not available yet for 2024	The total number of followers across social media platforms has remained steady at around 500,000 for the previous two years. This is a significant increase on the baseline	*Kallxo.com reports on social media users subscriptions and follows.*

								increase trend of followers by each year.				of 166,919 and indicates that the number of users has plateaued but remains constant.	
3.1.4 Number of high school female and male students (senior) reached during lectures	Project Reports	0	Dec.20	At least one high school per municipality	Trainings were held in two High Schools in Gjilan and Fushe-Kosova, where 48 students were participating.	20% increase from the previous year	More than 100 high school students introduced to investigative journalism and corruption reporting through 7 lectures	20% increase from the previous year	More than 120 high school students introduced to investigative journalism and corruption reporting through 5 lectures.	20% increase from the previous year	Steady annual increase.	30 high schools	Project reports will indicate the number of high school seniors reached throughout the duration of the project.
3.1.5 Number of registered subscribers on the paid subscription platform	Project Reports	0	Dec.20	At least one hundred	N/a		Kallxo has researched on the best modalities to allow subscription and plans have been made in this direction. The donation page has been created and currently, functionalities are being tested.		Kallxo.com has researched and assessed modalities to introduce subscriptions for their services. In addition, a donation page has been created and is currently being tested.	100	No progress on paid subscriptions to the service.	100	Kallxo.com reports

Annex VI: Digitalisation solutions facilitated by SAEK III

Digitalisation Solution	Beneficiary Institution	Key Results
The Depot Database	The Agency for the Management of Confiscated and Seized Assets (AMSCA)	• Terms of Reference developed • Procurement process ongoing
Electronic Declaration of Public Officials' Assets and Income Declarations Platforms	The Agency for Prevention of Corruption (APC)	• 98% of public servants used the online system to declare their assets
Database for Financing of Political Entities	Central Election Commission (CEC)	• Formulation of technical requirements • The platform will be tested at the end of May 2024
Notarial Case Management Platform	Ministry of Justice (MoJ) & Notary Chamber of the Republic of Kosovo	• Development of the functional requirements of the Notary Platform and beta version of the platform
Kosovo Prosecution Web-portal	Office of the Chief Prosecutor (OCP)	• Launch of the prosecutorial web-portal
An Online Investigation Tool	Tax Administration of Kosovo (TAK)	• In development process

Annex VII: List of Primary and Secondary Legislation Adopted or pending adoption with support of SAEK III

Primary and Secondary data adopted with support of SAEK

1. Law on Financing of Political Entities
2. Law on the Agency for the Prevention of Corruption
3. Law on Public Officials' Assets and Income Declarations
4. Law on the Special Prosecution Office
5. Law on the Kosovo Prosecutorial Council
6. Law on Court Appointed Experts
7. Regulation on Strategic Analysis
8. Regulation on the Establishment of the Asset Recovery Office
9. Regulation on the Methodology for Integrity Plans
10. Regulation on the Methodology for Corruption Proofing of Legislation
11. Regulation on the Selection Procedure for the Head of the Office for the Registration of Political Parties and Oversight over Political Party Financing
12. Regulation for Selecting Criteria for Auditing Political Parties' Financial Reports
13. Regulation for Internal Structure of the Office for Political Parties Financial Reporting and Control

Primary and Secondary data pending adoption with support of SAEK

1. Law on the Bureau for the Verification of Unexplained Wealth (pending Constitutional Court opinion)
2. Draft Amendment of the Constitution for Integrity of Judges
3. Draft Law on Law on Integrity of Judges
4. Draft Law on Notaries
5. Draft Law on the Academy of Justice
6. Draft Code of Ethics for Judicial Experts
7. Draft Regulation on Fees for Judicial Experts
8. Draft Regulation on Special Investigations Unit
9. Draft Regulation for Financial reporting and Monitoring of Political Parties

Annex VIII: Terms of Reference of the International Evaluation Specialist

I. Position Information

Title: **(INTERNATIONAL POSITION) Evaluation Specialist to Conduct Final Project Evaluation of the Support to Anti-Corruption Efforts in Kosovo Project, SAEK III**
Department/Unit: Governance and Peacebuilding Portfolio
Reports to: SAEK III Project Manager
Duty Station: Prishtina, Kosovo
Expected Places of Travel (if applicable): Kosovo
Duration of Assignment: 20 Apr - 10 June 2024

Need for presence of IC consultant in office:
☐**partial**
☐intermittent (explain)
☐full time/office based (needs justification from the Requesting Unit)

Provision of Support Services:
Office space: Yes - partial
Equipment (laptop etc):   No
Secretarial/Logistical Services   Yes - responsible SAEK III team members
If yes has been checked, indicate here who will be responsible for providing the support services:

Signature of the Budget Owner: ………………………………….

II. Background Information

The Support to Anti-Corruption Efforts in Kosovo project (SAEK III) focus is to support the implementation of new anti-corruption legislation and move toward the end goal of repatriation of stolen assets and complete a robust corruption prevention system. The project supports core governance functions, promote effective service provision, rule of law, anti-corruption capacities and access to justice, targeting this way barriers and vulnerabilities that keep people in poverty. It will complement the parallel efforts of partners to this project to maximize impact of our work in the area of gender equity, human rights and environment protection. Inclusive and accountable governance systems and processes are recognized as crucial to sustainable development and human security.

Through a three-tier approach, SAEK III supports the policy, structural and capacity level, towards achieving the following sustainable results:
* Fulfilment of technical and legal requirements for the effective implementation of anti-corruption laws and strategies such as anti-money laundering, anti-corruption, and related action plans.
* Establishment of a legal and institutional framework for coordinated prosecutor led joint investigations of financial crime; improved effectiveness in asset recovery; enhanced investigative journalism and coordination among public institutions at the central and local levels; further strengthening of Kallxo.com online platform for reporting corruption allegations.
* Provision of training for investigators on asset recovery and establishment of an asset recovery structure mandated to track down stolen assets and conduct thorough financial crime investigations.

The project provides expert support to the authorities in drafting policy documents, including national strategies and action plans, legislation, and guidance notes on conducting investigations, vetting procedures, conflict of interest recusal procedures, judicial oversight mechanisms and other anti-corruption mechanism and instruments, building upon interventions and novelties introduced throughout SAEK I and SAEK II.

To ensure adequate expertise and successful process within project's goals related to transparency and accountability, the project has identified several responsible partners/organizations:

- Basel Institute International Centre for Asset Recovery (ICAR) as the world leader in asset recovery training with exceptionally successful record in supporting national investigators in tracking down stolen assets hidden abroad through case work assistance to support the Kosovo authorities on bolster case work and help repatriate assets based on intelligence gathering, prosecution strategies, and asset tracing for complex corruption and money laundering cases.
- Rule of Law Advisory Group (RoLAG) to support the Anti-corruption and Asset Recovery Policy Support Service that will contain a repository of documents regarding national and international anti-corruption strategies, policies, legislation and procedures which can be accessed by public officials, as well as serve as the locally supported central body for anti-corruption and asset recovery policy-making and continuous training.
- Kallxo.com platform to perform its invaluable role of receiving reports from citizens about alleged corruption, wrongdoings and mismanagement of public funds.
- GAP Institute to contribute to increased transparency in government spending and revenues, as well as to develop comparison and evaluation studies of various approaches for the administration of confiscated illicit wealth from the 4 budgetary perspectives.

Main Project Partner(s) over the implementation years: The Swiss Agency for Development and Cooperation (SDC), Swedish International Development Cooperation Agency (SIDA), as our project's donors, Agency for the Prevention of Corruption, Prosecution, Supreme Court, Ministry of Justice, Finance Intelligence Unit, Central Election Commission, Academy of Justice, FOL Movement, Kosovo Tax Administration.

Start/end date of the project subject to impact external evaluation are, 1 July 2020 – 30 June 2024.

As the project entered its final stage of implementation, the project will hire an International Evaluation Specialist to conduct a final project evaluation to assess the overall progress towards the expected results and provide recommendations for future similar interventions.

Assignment will be conducted in line with UN 8 Point Agenda and the UNDP Gender responsive mandate.

III. Objective of the Assignment

The overall objective of this assignment is to conduct a final evaluation of the project in terms of its relevance, impact, effectiveness, efficiency, and sustainability, and elaborate on the lessons learned and recommendations for future interventions of similar nature.

The evaluation will take a specific overview of the projects' implemented activities, by gathering perceptions, aspirations, feedback and data from relevant partners, stakeholders and beneficiaries for objective analysis and conduct of the evaluation.

The evaluation will look to underline the key factors that have either facilitated or impeded project implementation. The International Evaluation Specialist will work together with and lead the Local Evaluation Specialist, under direct supervision of the Project Manager, in close consultation with the Programme Team. The project team will provide information on administrative and logistical support as needed.

IV. Scope of Work and Evaluation Questions

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 Expert conduct on-site field visits, meetings, discussions, and interviews with stakeholders of the project, donors of the project, responsible partners, UNDP senior management and Programme, and SAEK III team. The Evaluator is expected to share the list of interviews to be conducted beforehand and receive feedback and clearance from UNDP.
- Organize a debriefing workshop with UNDP and key stakeholders to present initial findings and recommendations.
- As per the model agreed from the inception report and on the feedback received by stakeholders and during the debriefing workshop/session, prepare the final evaluation report containing the methodology applied, a presentation of findings and clear strategic recommendations to the UNDP and its partners for future similar interventions. These recommendations should contain specifically to whom of each of the partners of the project they are addressed. The evaluation consultant will be responsible for all components of the evaluation, and responsible for provision of deliverables listed on time and of acceptable quality of reports, in accordance with the Terms of Reference, ensuring the quality of all products. The reports will be delivered in English language, be qualitative in content and accessible on data (not photo or pdf) due to adding's and translation in local languages.
- The final 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 final evaluation report, accounting for the UNDP and key stakeholders' feedback on the first draft.

Evaluation questions:

RELEVANCE:
- To what extent was the project in line with the national development priorities, the Kosovo programme's outputs and outcomes, the UNDP Strategic Plan and the SDGs?
- To what extent did the project contribute to the theory of change for the relevant programme outcome?
- Has the project been relevant in terms of the needs and potentials/resources of the key stakeholders and beneficiaries? What were the main circumstantial factors considered in the project plans and implementation?
- Was there sufficient local ownership demonstrated?
- To what extent did the project contribute to gender equality, the empowerment of women and the human rights-based approach?
- Have there been any changes in policies and strategy development that have affected the project? If yes, have necessary revisions and adaptations been designed?
- What, if any, are the areas of relevance for future interventions in the target area?

EFFECTIVENESS:
- To what extent did the project contribute to the country programme outcomes and outputs, the SDGs, the UNDP Strategic Plan and national development priorities?
- Has the project been on track to achieve its expected results? What has been achieved?
- What challenges have been faced? What has been done to address the potential challenges/problems?
- Has the project appropriately reached its target groups? Has the project served 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?
- Have the expected results been clearly defined, both quantitatively and qualitatively, and have they been achieved with the planned approach and resources?
- How has the project implemented the commitments to promote ownership, alignment, harmonization, management for development results and mutual accountability?
- What factors have contributed to achieving or not achieving intended country programme outputs and outcomes?
- What factors have contributed to achieving or not achieving intended project outputs and outcomes?
- What factors contributed to effectiveness or ineffectiveness?
- Were the projects objectives and outputs clear, practical and feasible within its frame?
- To what extent have stakeholders been involved in project implementation?
- To what extent are project management and implementation adaptive and participatory and is this participation contributing towards achievement of the project objectives?
- How effective were the responsible partners on contributing to project's goals?

EFFICIENCY:
- Was the project management structure outlined in the project document efficient in generating the planned outputs?
- To what extent the strategy and the project execution were efficient and cost-effective?
- 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)
- Have the resources (funds, human resources, time, expertise, etc.) been allocated strategically to achieve results?

- To what extent have project funds and activities been delivered in a timely manner?
- How efficient were responsible partners toward contributing to the outcomes of the project?

SUSTAINABILITY:
- How has the project ensured sustainability of its results and impacts (i.e. continuity of developed capacities, use of knowledge, improved practices, etc.)?
- How much has the project lead to a change of behaviours and motivations in terms of paying attention to marginalized and vulnerable population groups?
- Are there any financial, political or social risks that might jeopardize the sustainability of project outputs?
- Do the legal frameworks, policies and processes within which the project operates pose risks that may jeopardize sustainability of project benefits?
- To what extent do mechanisms, procedures and policies exist to allow primary stakeholders to carry forward the results attained on gender equality, empowerment of women, human rights and human development?
- To what extent do stakeholders support the project's long-term objectives?
- Were the lessons learned documented by the project team on a continual basis and shared with appropriate parties who could learn from the project?
- What could be done to have better exit strategies and sustainability?
- Did implementing partners receive further support in assessing and identifying a business model that is not dependent on donor funds?
- How far SAEK has progressed toward developing a clear exit strategy in a participatory manner?
- Do public institutions like the Agency for Prevention of Corruption, police, prosecution etc. offer reliable channels for reporting corruption?
- To what extent online platform such as "How does the state spend my money?" is sustainable or can be institutionalized?

Stakeholders and Partnership Strategy
- Who are the major actors and partners involved in the project and how were their roles and interests?
- Was the partnership strategy effective?
- To what extent the project contributed to awareness raising and capacity development of the involved partners, the efficiency of partnerships developed and implications on national ownership?

Evaluation:
- Can the project be evaluated credibly?
- Were intended results (outputs, outcomes) adequately defined, appropriate and stated in measurable terms, and are the results verifiable?
- Were monitoring systems in place and how effective has it been?
- To what extent are the results at the outcome level attributable to the project actions?

Theory of Change or Results/Outcome Map
- What are the underlying rationales and assumptions or theory that defines the relationships or chain of results that lead initiative strategies to intended outcomes?
- What are the assumptions, factors or risks inherent in the design that may influence whether the initiative succeeds or fails?

Evaluation cross-cutting issues sample questions
Human rights
- To what extent have poor, people with disabilities and other disadvantaged and marginalized groups benefited from the work of the project?

Gender
- What effects were realized in terms of gender equality, if any?
- Were women and men distinguished in terms of participation and benefits within project?
- To what extent has the project promoted positive changes in gender equality and the empowerment of women?
- What were the follow up actions deriving from the Gender Corruption Risks and Vulnerabilities survey?
- Was gender perspective included in the Integrity Plans?

Digitalization
- Did the project introduce digital solutions as part of its work?
- Did the applied digital solution have the desired effect and were there any unintended effects (positive and negative)?

- Are the capacities of responsible institutions sufficient for taking over the maintenance of the platform provided?

V. Methodology and Evaluation Ethics

The Evaluation Team may employ any relevant and appropriate quantitative or qualitative methods it deems appropriate to conduct the project 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 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 team, donors, Project partners and beneficiaries (Agency for the Prevention of Corruption, Prosecution, Supreme Court, Ministry of Justice, Finance Intelligence Unit, Central Election Commission, Academy of Justice, FOL Movement, Kosovo Tax Administration.) The team will be expected to share the list of interviews to be conducted with UNDP SAEK III team 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 final 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.

VI. Expected Outputs and Deliverables

Deliverables/Outputs	Target Due Dates	Review and Approvals Required
Inception report containing the methodology to be applied during the final evaluation, as well as the work plan and technical instruments to be used during the assignment is drafted, submitted, and endorsed by UNDP.	30 Apr 2024	Evaluation Manager and Programme Analyst
Field visits, meetings and interviews in Kosovo are conducted, gathering data to be used in the final evaluation report.	17 Mat 2024	Evaluation Manager and Programme Analyst
A debriefing workshop with UNDP and key stakeholders is held and initial findings and recommendations presented (online).	24 May 2024	Evaluation Manager and Programme Analyst
Draft final Evaluation report with the methodology applied, a presentation of findings, a presentation of the lessons learned and clear strategic recommendations to the UNDP, is submitted.	28 May 2024	Evaluation Manager and Programme Analyst
A Final Evaluation report accounting for the UNDP and stakeholders' feedback on the first draft is produced and validated by UNDP.	10 June 2024	Evaluation Manager and Programme Analyst

VII. Recruitment qualifications

Education:
- Master's degree in social sciences, economic development or other related qualification.

Experience:
- At least 5 years of demonstrated relevant work experience with evaluation of development interventions at national and/or international level is required.

- Demonstrable experience with evaluation processes for capacity development initiatives in the anti-corruption field;
- Previous work experience in the Western Balkans, preferably Kosovo in particular, is considered an asset.
- Extensive knowledge of results-based management evaluation, as well as of participatory M&E methodological and practical considerations in conducting evaluations of development interventions is required.

Language requirements:
Fluent in English. Excellent analytical and report writing skills in clear and fluent English

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VIII. Scope of price proposal and schedule of payments

The Contract is based on lump-sum remuneration and shall be processed subject to deliverables as per the schedule
listed below:
- Deliverable 1 - Submission of the Inception report with methodology: 20% of the total amount of the contract
- Deliverable 2, 3 & 4 – Draft final Evaluation report: 50% of the total amount of the contract
- Deliverable 5 – Final Evaluation report: 30% of the total amount of the contract

Payments will be made upon successful completion of the deliverables and their acceptance by the Project Manager/Programme Analyst, including submission of a certificate of payment.

IX. Recommended presentation of offer

The following documents are required:

- A CV indicating all experience from similar projects, as well as the contact details (email and telephone number) of the candidate and at least three (3) professional references.
- Technical proposal: a max. the 2-page document briefly outlining the methodology envisaged for the assignment for delivering the expected results within the indicated timeframe.
- Financial proposal: The International Evaluation Specialist is expected to provide an all-inclusive lump sum amount/financial proposal.
- A copy of Diplomas and a copy of Passport.

X. Criteria for selection of the Best Offer

Offers will be evaluated using a combined scoring method, where the technical qualifications, relevant work experience and the technical proposal will be weighted a max. of 70% and combined with the price offer which will be weighted a max of 30%.

XI. Competencies

Corporate Competencies
- Demonstrates integrity by modelling the UN's values and ethical standards
- Promotes the vision, mission and strategic goals of UNDP
- Displays cultural, gender, religion, race, nationality and age sensitivity and adaptability
- Treats all people fairly without favouritism

Functional Competencies
- Plans, prioritizes, and delivers tasks on time.
- Ability to work independently and takes initiative in addressing problems encountered.
- Ability to establish effective working relations in a multicultural team environment; supports effective and efficient team work.
- Result oriented and constructive attitude.
- Analytical and strategic thinking / results oriented;
- Ability to design and manage coordination processes, including with multiple stakeholders;
- Good knowledge of organizational policies and procedures related to the position and ability to apply them consistently in work tasks;
- Good knowledge of information technology and ability to apply it in work assignments;
- Good interpersonal skills and ability to communicate effectively, both orally and in writing;

- Learning and sharing knowledge and encourage the learning of others.

This TOR is accepted by:

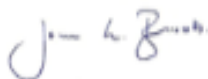Name: _____

Signature: _____

Date of Signature: _____

Annex IX: Signed Ethical Pledge

ETHICAL GUIDELINES FOR EVALUATION
PLEDGE OF ETHICAL CONDUCT IN EVALUATION

By signing this pledge, I hereby commit to discussing and applying the UNEG Ethical Guidelines for Evaluation and to adopting the associated ethical behaviours.

INTEGRITY	ACCOUNTABILITY	R E S P E C T	BENEFICENCE
I will actively adhere to the moral values and professional standards of evaluation practice as outlined in the UNEG Ethical Guidelines for Evaluation and following the values of the United Nations. Specifically, I will be: • Honest and truthful in my communication and actions. • Professional, engaging in credible and trustworthy behaviour, alongside competence, commitment and ongoing reflective practice. • Independent, impartial and incorruptible.	I will be answerable for all decisions made and actions taken and responsible for honouring commitments, without qualification or exception; I will report potential or actual harms observed. Specifically, I will be: • Transparent regarding evaluation purpose and actions taken, establishing trust and increasing accountability for performance to the public, particularly those populations affected by the evaluation. • Responsive as questions or events arise, adapting plans as required and referring to appropriate channels where corruption, fraud, sexual exploitation or abuse or other misconduct or waste of resources is identified. • Responsible for meeting the evaluation purpose and for actions taken and for ensuring redress and recognition as needed.	I will engage with all stakeholders of an evaluation in a way that honours their dignity, well-being, personal agency and characteristics. Specifically, I will ensure: • Access to the evaluation process and products by all relevant stakeholders – whether powerless or powerful – with due attention to factors that could impede access such as sex, gender, race, language, country of origin, LGBTQ status, age, background, religion, ethnicity and ability. • Meaningful participation and equitable treatment of all relevant stakeholders in the evaluation processes, from design to dissemination. This includes engaging various stakeholders, particularly affected people, so they can actively inform the evaluation approach and products rather than being solely a subject of data collection. • Fair representation of different voices and perspectives in evaluation products (reports, webinars, etc.).	I will strive to do good for people and planet while minimizing harm arising from evaluation as an intervention. Specifically, I will ensure: • Explicit and ongoing consideration of risks and benefits from evaluation processes. • Maximum benefits at systemic (including environmental), organizational and programmatic levels. • No harm. I will not proceed where harm cannot be mitigated. • Evaluation makes an overall positive contribution to human and natural systems and the mission of the United Nations.

I commit to playing my part in ensuring that evaluations are conducted according to the Charter of the United Nations and the ethical requirements laid down above and contained within the UNEG Ethical Guidelines for Evaluation. When this is not possible, I will report the situation to my supervisor, designated focal points or channels and will actively seek an appropriate response.

19th April 2024

(Signature and Date)

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J. Pajaziti   19.04.2024

(Signature and Date)