EVALUATION REPORT

MID-TERM EXTERNAL EVALUATION OF THE

"SUPPORT TO JUSTICE INITIATIVES CURBING CORRUPTION AND PROMOTING COMMERCIAL DISPUTE RESOLUTION" (ACAI) PROJECT

Country of the evaluation intervention:
Republic of Iraq

Timeframe of the evaluation:
30 April 2021 - 31 August 2024

Date of report:
31 August 2024

EVALUATION COMMISSIONED BY

UNDP IRAQ

REPORT PREPARED BY

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ACKNOWLEDGEMENTS

DISCLAIMER

PROJECT AND EVALUATION INFORMATION DETAILS

Project Information	
Project/outcome title	**Support to justice initiatives curbing corruption and promoting commercial dispute resolution**
Project number/ Quantum ID	00126945
UNSDCF Outcome / Country Programme Document (CDP) 2020-2024 Outcome	Strengthened institutions and systems deliver people-centered, evidence and needs-based equitable and inclusive gender and age-responsive services, especially for the most vulnerable populations, with particular focus on advocating for women's leadership in decision-making processes.
UNDP Strategic Plan (2022-2025) Output	Open, agile, accountable, and future-ready governance systems in place to co-create and deliver solutions to accelerate SDG achievement.
Country	Republic of Iraq

Project dates	Start	Planned end
	30 April 2021	29 April 2025

Total committed budget	EUR 15,000,000 estimated at USD 17,611,500 (EUR to USD rate in April 2021)
Funding source	European Union
Project Implementation Approach	Direct Implementation Modality (DIM)
Implementing party	UNDP Country Office Iraq
Gender Marker	2

Evaluation information	
Evaluation type	Mid-term external project evaluation

Period under evaluation	Start	End
	30 April 2021	31 August 2024

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Evaluation dates	Start	Completion
	11 February 2024	31 August 2024

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LIST OF ACRONYMS AND ABBREVIATIONS

ACAI	Support to Justice Initiatives Curbing Corruption and Promoting Commercial Dispute Resolution (project name)
ACCF	Anti-Corruption Coordination Forum
ACT Iraq	Anti-Corruption Trust for Iraq
AUIB	American University in Baghdad
AUIS	American University of Iraq Sulaymaniyah
BOSA	Board of Supreme Audit
CLDP	Commercial Law Development Program
CoI	Commission of Integrity
CPD	Country Programme Document
CSO	Civil Society Organization
EU	European Union
EUAM	European Union Advisory Mission
FGD	Focus Group Discussion
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German Development Agency)
HJC	Higher Judicial Council
INL	Bureau of International Narcotics and Law Enforcement Affairs (US)
KII	Key Informant Interview
KRG	Kurdistan Regional Government
KRI	Kurdistan Region of Iraq
LNOB	Leaving No One Behind
M&E	Monitoring and Evaluation
MoU	Memorandum of Understanding
NCI	National Corruption Index
NDP	National Development Plan
NGO	Non-Governmental Organization
NIC	National Investment Commission
NMI	NATO Mission Iraq
PMU	Project Management Unit
ProDoc	Project Document
PSC	Project Steering Committee
SDG	Sustainable Development Goal
SJC	Supreme Judicial Council
SOP	Standard Operating Procedure
StAR	Stolen Asset Recovery Initiative
TAT	Technical Assistance Team
TOC	Theory of Change
TOT	Training of Trainers
UN	United Nations
UNCAC	United Nations Convention Against Corruption
UNCITRAL	United Nations Commission on International Trade Law
UNDAF	United Nations Development Assistance Framework
UNDP	United Nations Development Programme
UNEG	United Nations Evaluation Group
UNICEF	United Nations Children's Fund
UNITAD	United Nations Investigative Team to Promote Accountability for Crimes Committed by Da'esh/ISIL
UNSDCF	United Nations Sustainable Development Cooperation Framework
UNODC	United Nations Office on Drugs and Crime
UNAMI	United Nations Assistance Mission for Iraq

EXECUTIVE SUMMARY

Introduction

This mid-term evaluation assesses the progress, effectiveness, and potential impact of the Support to Justice Initiatives Curbing Corruption and Promoting Commercial Dispute Resolution (ACAI) project in Iraq. The evaluation aims to provide evidence-based findings and recommendations to inform decision-making by UNDP, the European Union as donor, and Iraqi government partners regarding potential adjustments to project activities, resource allocation, and implementation approaches.

Intervention Description

The ACAI project, funded by the European Union and implemented by UNDP Iraq from April 2021 to April 2025, aims to strengthen Iraq's anti-corruption framework and improve its business environment. Key components include:
-    Improving the legislative and strategic framework for anti-corruption
-    Enhancing the capacity of the justice sector to process corruption offenses
-    Strengthening commercial dispute resolution mechanisms
-    Creating a supportive environment in Parliament for anti-corruption reforms
-    Increasing transparency and public accountability

The project operates at both federal and regional levels, engaging government institutions, the judiciary, civil society, and the private sector. It aligns with Iraq's national development priorities and contributes to Sustainable Development Goals 8 and 16.

Evaluation Approach and Methodology

This utilization-focused, theory-based evaluation employed a mixed-methods approach, combining qualitative and quantitative data collection and analysis techniques. The methodology included:
-    Desk review of project documents, reports, and relevant contextual literature
-    Key informant interviews with project staff, government partners, and other stakeholders
-    Focus group discussions with project beneficiaries
-    Analysis of project monitoring data and performance indicators

The participatory approach ensured diverse perspectives were captured to produce relevant and actionable findings.

Principal Findings

-    Relevance: The project demonstrates strong alignment with Iraq's development priorities and UNDP's country program objectives, addressing key gaps in the anti-corruption framework. Its comprehensive approach addresses systemic weaknesses.
-    Coherence: ACAI effectively complements work among different entities, with strong coordination with development partners through the Anti-Corruption Coordination Forum.
-    Efficiency: The project shows mixed progress towards output targets, with strong performance in some areas but delays in others. Efficiency measures like leveraging UNDP structures and strategic resource allocation have been employed.
-    Effectiveness: Outputs are clearly articulated and feasible, with a suitable multi-stakeholder approach. Adaptive management has been key in the complex operating environment.
-    Impact: The project contributes to strengthening the anti-corruption legal framework, building institutional capacity, and fostering a culture of transparency. Enhanced dispute resolution has economic impact potential.

- Sustainability: Benefits in legislative reform, capacity building, and civil society empowerment show potential for continuation post-project. Challenges include reliance on external funding and need for government resource commitments.

Conclusions

ACAI demonstrates relevance, coherence with government priorities and UNDP objectives, and effectiveness in adapting to complex realities. Strengthening legal frameworks, building capacity, and empowering civil society are key to sustainability. Efficiency can be enhanced through streamlining implementation. Institutionalization of reforms, skills, and a culture of integrity are important for lasting impact.

Recommendations

- Enhance strategic engagement with Parliaments to accelerate adoption of anti-corruption legislation.
- Develop an exit strategy to ensure sustainability of project outcomes.
- Increase involvement of Iraqi experts in capacity building for local ownership.
- Diversify funding sources to mitigate risks to financial sustainability.

Evaluation Limitations and Mitigation Strategies

Limitations included a predominant reliance on qualitative data, overrepresentation of male interlocutors reflecting the male-dominated field, and potential loss of nuance in translation. These were mitigated through triangulation, deliberate efforts to include female participants where possible, and follow-up clarifications.

Evaluation Quality and Standards

The evaluation adhered to UNEG Ethical Guidelines and UNDP evaluation guidelines. Measures to ensure impartiality and credibility included triangulation of diverse data sources, use of structured analysis methods, and transparent reporting of limitations.

Next Steps and Way Forward

The findings of this evaluation will inform adaptive management by the project team, strategic decisions by UNDP, and policy formulation by the Iraqi government partners. Stakeholders are encouraged to reflect on these findings and take action to enhance the project's effectiveness and impact in its final stages.

1. INTRODUCTION

Background and Context

Iraq continues to face significant governance challenges, with corruption remaining a major obstacle to economic development, political stability, and the effective delivery of public services. The country ranked 157 out of 180 countries in Transparency International's 2021 Corruption Perceptions Index[1], highlighting the persistent nature of this issue. Against this backdrop, the Support to Justice Initiatives Curbing Corruption and Promoting Commercial Dispute Resolution (ACAI) project was launched in 2021 as an intervention to strengthen Iraq's anti-corruption framework and improve its business environment.

The ACAI project operates in a complex socio-political context characterized by ongoing security concerns, political fragmentation, and economic difficulties exacerbated by fluctuating oil prices. However, the project also benefits from a growing recognition among Iraqi leadership and civil society of the need to address corruption as a prerequisite for sustainable development and improved governance.

The project aligns closely with Iraq's national priorities as outlined in its Vision 2030 and National Development Plan 2018-2022, which emphasize good governance and anti-corruption as key pillars for economic growth and social progress. At the international level, the project supports Iraq's commitments under the United Nations Convention Against Corruption (UNCAC) and contributes to the achievement of Sustainable Development Goal 16 on peace, justice and strong institutions.

By strengthening institutional capacities to investigate and prosecute corruption while also empowering civil society to demand accountability - the ACAI project adopts a holistic approach to addressing this complex challenge. Its focus on commercial dispute resolution and creating an enabling environment for private sector development further underscores the project's alignment with broader economic development goals.

Evaluation Purpose

This mid-term evaluation of the ACAI project serves several purposes:

1. To assess the project's progress towards its intended results at the midpoint of implementation.
2. To identify strengths, weaknesses, and challenges in the project's design and execution.
3. To provide evidence-based recommendations for improving project performance and maximizing impact in the remaining implementation period.
4. To contribute to organizational learning and knowledge sharing within UNDP and among project partners.

The evaluation is particularly timely as it coincides with a period of political transition in Iraq, offering an opportunity to reassess the project's alignment with evolving national priorities and to adapt strategies as necessary. The findings and recommendations are expected to inform decision-making by UNDP, the European Union as donor, and Iraqi government partners regarding potential adjustments to project activities, resource allocation, and implementation approaches.

Evaluation Questions

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[1] Transparency International, 2021 Corruption Perceptions Index (Berlin: Transparency International, 2021), https://www.transparency.org/en/cpi/2021

The evaluation addresses a set of questions across the OECD-DAC criteria of relevance, coherence, effectiveness, efficiency, impact, and sustainability. Key themes explored include:

- The project's alignment with national priorities and beneficiary needs
- Coordination and synergies with other anti-corruption initiatives
- Progress towards achieving intended outputs and outcomes
- Efficiency of resource utilization and implementation strategies
- Potential for long-term impact and sustainability of project results
- Integration of cross-cutting issues such as gender equality and human rights

Intervention Description

Key components include:

1. Improving the legislative and strategic framework for anti-corruption
2. Enhancing the capacity of the justice sector to process corruption offenses
3. Strengthening commercial dispute resolution mechanisms
4. Creating a supportive environment in Parliament for anti-corruption reforms
5. Increasing transparency and public accountability

The project operates at both the federal level and in the Kurdistan Region of Iraq, engaging a wide range of stakeholders including government institutions, the judiciary, civil society organizations, and the private sector. With a total budget of EUR 15 million provided by the European Union, the project is implemented by UNDP Iraq over a four-year period from April 2021 to April 2025.

Evaluation audience

The primary users of this evaluation include:

- UNDP Iraq: To inform project management decisions and improve implementation strategies
- European Union: To assess the effectiveness of funding and inform future programming and partnership decisions
- Iraqi federal and Kurdistan government partners: To enhance ownership and guide national anti-corruption efforts
- Civil society organizations: To strengthen engagement in anti-corruption initiatives

The evaluation results are expected to be used to refine project implementation strategies, reallocate resources if necessary, and enhance coordination among stakeholders to maximize impact in the remaining project period.

Evaluation Approach and Methodology

This mid-term evaluation adopted a utilization-focused, theory-based approach to assess the ACAI project's progress, effectiveness, and potential for impact. This approach ensured the evaluation findings would be practical and actionable for stakeholders while examining the underlying theory of change.

Contribution Analysis was employed as the primary methodological framework, allowing for an examination of the theory of change against available data, logic, and assumptions. This was particularly suitable given the complex, multi-stakeholder nature of anti-corruption efforts in Iraq.

The evaluation utilized a non-experimental, mixed-methods design, with a predominant focus on qualitative data. The methodology included:

- Desk review of project documents, reports, monitoring data, and relevant literature
- Key informant interviews with various stakeholders, conducted both online and offline
- Focus group discussions with the National Investment Committee and the KRI Bar Association

Gender equality, disability inclusion, and social inclusion considerations were integrated throughout the evaluation process. The approach emphasized participatory and consultative processes to ensure diverse perspectives were captured and findings were relevant and actionable for all key stakeholders.

Report Structure and Contents

This evaluation report is structured as follows:

1. Executive Summary: Provides a concise overview of key findings and recommendations
2. Introduction: Outlines the evaluation context, purpose, and approach
3. Description of the Intervention Being Evaluated: Details the project's background, objectives, and implementation
4. Evaluation Scope and Objectives: Specifies the evaluation's coverage, purpose, and key questions
5. Evaluation Approach and Methods: Explains the methodological framework and data collection techniques
6. Findings: Presents detailed findings organized by evaluation criteria
7. Conclusions: Synthesizes key insights based on the findings
8. Recommendations: Offers actionable suggestions for improving project performance
9. Lessons Learned: Highlights key lessons for the remaining project timeframe and future interventions
10. Good Practices: Identifies successful approaches that can be replicated or scaled
11. Annexes: This section includes the Terms of Reference, stakeholder analysis, data collection methods, list of reviewed documents, in-depth analyses of interview data and project implementation against targets, a SWOT analysis of the intervention, and the evaluator's pledge of ethical conduct.

The findings section forms the core of the report, providing an assessment of performance across all evaluation questions reflected in the ToR. The recommendations and lessons learned sections will be of particular interest to project manager and decision-makers looking to enhance the project's effectiveness and impact in its final stages of implementation.

2. DESCRIPTION OF THE INTERVENTION BEING EVALUATED

The Support to Justice Initiatives Curbing Corruption and Promoting Commercial Dispute Resolution (ACAI) project aims to build on Iraqi efforts to fight corruption in a sustainable manner and create a conducive environment for attracting foreign investments and private sector development. The project seeks to benefit Iraqi government institutions, the justice sector, civil society, and ultimately the Iraqi people by addressing widespread corruption that impacts all aspects of citizens' lives and hinders economic development.

Expected Results and Implementation Strategy

The project's results framework includes the following key outputs:

1. Improved legislative and strategic framework for anti-corruption
2. The justice sector, lawyers and CoI are better equipped to process corruption offenses due to improved technical skills and integrity rules
3. Enhanced legislation, institutions, and capacity for commercial dispute resolution
4. Create a climate of support in Parliament for anti-corruption reforms
5. Increased transparency and public accountability

The implementation strategy involves providing technical assistance to address legislative/strategic gaps, training investigators, judges, prosecutors and lawyers on anti-corruption skills and integrity standards, reforming commercial arbitration/mediation legislation and building institutional capacity, engaging Parliament to increase support for anti-corruption measures, and supporting CoIs and judiciary to increase transparency and engage civil society/media.

The project adopts a gradual, technical assistance-focused approach while continuously analyzing the political context to adapt to opportunities or obstacles. It engages at both technical and senior political levels to build synergies across institutions. Sustainability will come from empowering Iraqi institutions, facilitating legislative reforms, and strengthening linkages between anti-corruption stakeholders.

The project's Theory of Change (see Annex 3) rests on several key assumptions:
- Sufficient political will exists to genuinely tackle corruption, adopt reforms, and engage with the project
- Parliament will constructively engage to endorse anti-corruption legislation
- Improved skills and integrity standards will tangibly improve anti-corruption enforcement
- Modernizing commercial dispute resolution will increase investor confidence
- Transparency and civil society engagement will sustain momentum for reform

Alignment with National and International Priorities

The project aligns with Iraq's National Development Plan 2018-2022[2] and Vision 2030[3], as well as the Kurdistan Regional Government's Vision 2030[4] and Roadmap to Economic Reforms[5]. It also supports the current Iraqi government's priorities, as outlined by Prime

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[2] Government of Iraq, National Development Plan 2018-2022 (Baghdad: Ministry of Planning, 2018), https://faolex.fao.org/docs/pdf/irq214656E.pdf
[3] Government of Iraq, Iraq Vision 2030 (Baghdad: Ministry of Planning, 2019), https://planipolis.iiep.unesco.org/sites/default/files/ressources/iraq_vision_2030_en.pdf
[4] Kurdistan Regional Government (KRG), Kurdistan Region of Iraq Vision 2030 (Erbil: KRG, 2020), https://www.iraqfoundation.org/wp-content/uploads/2021/04/KRI-Vision-2030-English.pdf
[5] Kurdistan Regional Government (KRG), Roadmap to Economic Reforms (Erbil: KRG, 2016), accessed July 23, 2024, https://open.undp.org/projects/00098460

Minister Mohammed Shia' Al Sudani in his address to the UN General Assembly on 22 September 2023.[6] These priorities include creating employment opportunities, eradicating poverty, fighting corruption, and enacting economic reforms, all of which are directly addressed by the project's objectives.

The project contributes to the United Nations Sustainable Development Cooperation Framework (UNSDCF) 2020-2024 for Iraq[7], specifically Outcome 3.1 on strengthening institutions to deliver people-centered services. It advances the implementation of the UN Convention Against Corruption (UNCAC)[8] and supports the achievement of the United Nations Development Programme (UNDP) Strategic Plan 2022-2025 goals[9], particularly Goal 2 on accelerating structural transformations for sustainable development and Goal 3 on building resilience.

Furthermore, the project directly promotes progress towards Sustainable Development Goal (SDG) 8 on decent work and economic growth and SDG 16 on peace, justice, and strong institutions[10], contributing to the 2030 Agenda for Sustainable Development.

Implementation Phase and Changes

The project is currently in its third year of implementation, having started in April 2021 with an expected end date of April 2025. A change occurred after the inception phase in 2022, when the project document was revised to incorporate findings from an in-depth assessment. This led to expanding and restructuring some outputs, particularly related to commercial dispute resolution, to take a more comprehensive approach. The revised project document maintained the core objectives and overall structure of the initial document while introducing several modifications to enhance the project's scope, relevance, and potential impact. Key changes included:
- Expanding the scope of Output 3 on commercial dispute resolution to cover a broader range of activities including legislative reform, institutional development, and capacity building
- Adding new outputs focused on creating parliamentary support for anti-corruption reforms and increasing transparency and public accountability
- Developing a theory of change
- Refining the results framework with more specific and measurable indicators

Key Partners and Roles

The key partners for each output are:

Output 1: Improved Legislative and Strategic Framework for Anti-Corruption

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[6] United Nations, "Iraqi Prime Minister highlights national priorities focused on people," UN News, September 22, 2023, https://news.un.org/en/story/2023/09/1141367

[7] United Nations, United Nations Sustainable Development Cooperation Framework (UNSDCF) 2020-2024 for Iraq (New York: United Nations, 2020), https://unsdg.un.org/sites/default/files/cf-documents/20868075-5308-4a80-b0de-2a73030bb58d_UNSDCF_v4_10_March_%282%29.pdf

[8] United Nations Office on Drugs and Crime (UNODC), United Nations Convention against Corruption (New York: United Nations, 2004), https://www.unodc.org/unodc/en/corruption/convention.html

[9] United Nations Development Programme (UNDP), UNDP Strategic Plan 2022-2025 (New York: UNDP, 2022), https://www.undp.org/sites/g/files/zskgke326/files/2022-07/UNDP%20Strategic%20Plan%202022-2025.pdf

[10] United Nations, Transforming our world: the 2030 Agenda for Sustainable Development, A/RES/70/1 (New York: United Nations, 2015), https://www.unep.org/resources/report/transforming-our-world-2030-agenda-sustainable-development

- Federal and Kurdistan Regional Government Commissions of Integrity: Key partners in developing anti-corruption strategies and legislative reforms
- Parliament: Engagement on anti-corruption legislation and oversight

Output 2: Improved Capacity and Integrity in Processing Corruption Offenses
- Higher Judicial Council: Collaboration on judicial integrity measures and capacity building for judges and prosecutors
- Federal and Kurdistan Regional Government Commissions of Integrity: Partners in capacity building for investigators

Output 3: Enhanced Commercial Dispute Resolution
- Ministry of Justice, Shura Council, and State Council: Key partners in legislative reforms related to arbitration and mediation
- Ministry of Trade, Ministry of Planning, Ministry of Finance, and Boards of Investment: Collaboration on capacity building for public servants
- Chambers of Commerce in Baghdad and Kurdistan Region: Partners in establishing arbitration and mediation centers
- Universities in Baghdad and Erbil: Collaboration on arbitration education and curriculum development

Output 4: Increased Parliamentary Support for Anti-Corruption
- Parliament: Key partner in promoting anti-corruption reforms and oversight

Output 5: Increased Transparency and Public Accountability
- Federal and Kurdistan Regional Government Commissions of Integrity: Partners in strategic communications and outreach
- Higher Judicial Council: Collaboration on developing communication strategies
- Civil society organizations and media: Partners in promoting transparency, accountability and responsible reporting on corruption

UNAMI provides support on trial monitoring, while other UN agencies like UNODC provide technical expertise as needed. The project also collaborates with international partners through an Anti-Corruption Coordination Forum.

Project Stakeholders

The key stakeholders of the project, who will rely on the evaluation findings, include the Supreme Judicial Council, Commission of Integrity (Federal and Kurdistan), Council of Representatives, Kurdistan Region Shora Council, Federal and regional Prime Minister's Offices, Parliament, Iraqi civil society organizations, UNDP and the European Union Delegation in Iraq.

The project's intended beneficiaries are the people of Iraq, who will ultimately benefit from strengthened anti-corruption efforts. The project works towards this goal by engaging a diverse range of stakeholders, including judges, prosecutors, investigators, lawyers, public officials, parliamentarians, journalists, and civil society activists.

The project has made deliberate efforts to promote gender equality and women's participation across its activities. It strives for increased women's participation through enhanced outreach and communication, aiming for a minimum of 20% women's participation in its commercial dispute resolution training programs. The project has also organized specific workshops for women, such as the workshop on the New York Convention for the Women Judges Association.

Cross-cutting issues addressed by the project include gender equality, human rights, and the engagement of vulnerable and marginalized groups. The project integrates gender equality and civil society engagement as cross-cutting elements in its design and implementation. It aims to promote understanding of corruption work, integrity, and transparency in parliament, ensuring no group is left behind. The trial monitoring program, implemented in collaboration with UNAMI's human rights office, aims to promote the rule of law, justice, and human rights.

Geographic Coverage

The project has a national scope, covering project activities across Iraq with a particular focus on the provinces of Baghdad and Erbil. The majority of policy-level activities are undertaken in coordination with the Federal Government of Iraq. However, a selected number of activities are also undertaken with the engagement of the Kurdistan Regional Government in Iraq (KRI), as determined during the project inception phase in consultation with key Iraqi interlocutors.

The focus on Baghdad and Erbil reflects the concentration of key government institutions and judicial bodies in these locations. Baghdad, as the capital, houses the central government, parliament, and key federal institutions. Erbil, as the capital of the Kurdistan Region of Iraq, is the seat of the regional government and judiciary. Engaging both federal and regional levels is crucial for the project's objectives of strengthening anti-corruption efforts and promoting commercial dispute resolution across Iraq.

Resources

The project has a total budget of USD 17,611,500 funded by the European Union for a duration of 48 months from April 2021 to April 2025. The project team consists of a Project Management Unit (PMU) with dedicated staff and a Technical Assistance Team (TAT) with national and international experts. The project also relies on support from UNDP Iraq's management and operational staff.

Contextual Factors

From 2021 to mid-2024, Iraq faced a complex array of political, economic, security, and social challenges that hindered the country's democratic progress and development. Despite holding elections and having various groups represented in the political system, democratic governance remained impeded by widespread corruption, the influence of militias operating outside the bounds of the law, and the weakness of formal institutions[11][12][13].

Throughout this period, the Iraqi government grappled with low institutional capacity, widespread corruption, and extensive influence of regional players, which hindered the ability of elected officials to formulate and implement policies[14]. Despite its increasingly assertive independence, the judiciary continued to be affected by external factors such as political pressure, acts of intimidation, societal forces, and religious interests[15].

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[11] Freedom House, "Iraq: Freedom in the World 2022 Country Report," Freedom in the World 2022 (Washington, D.C.: Freedom House, 2022), https://freedomhouse.org/country/iraq/freedom-world/2022

[12] Freedom House, "Iraq: Freedom in the World 2023 Country Report," Freedom in the World 2023 (Washington, D.C.: Freedom House, 2023), https://freedomhouse.org/country/iraq/freedom-world/2023

[13] Bertelsmann Stiftung, BTI 2024: Iraq (Gütersloh: Bertelsmann Stiftung, 2024), https://bti-project.org/en/reports/country-dashboard/IRQ

[14] Freedom House, Freedom in the World 2022 and 2023

[15] Freedom House, Freedom in the World 2023

Economically, Iraq continued to rely heavily on oil revenues, with attempts to diversify the economy and modernize the financial and banking sectors hampered by political dynamics. Corruption remained rampant, and the lack of basic services was widespread, with more than 800,000 Iraqis living in extreme poverty.[16]

Environmental challenges, such as water scarcity and the threat to the Iraqi marshes due to Turkey and Iran's restriction of Iraq's access to river water, posed significant risks to the country's ecosystems and the livelihoods of its citizens[17].

In the Kurdistan region, democratic institutions lacked the strength to contain the influence of the two ruling parties, each maintaining its own internal security forces occasionally engaging in the repression of journalists and peaceful protesters.[18]

In conclusion, during the period from 2021 to mid-2024, Iraq faced significant obstacles in its pursuit of democratic progress, economic development, and social stability. The complex interplay of political, economic, security, and environmental challenges, combined with the influence of regional actors and the weakness of formal institutions, hindered the country's ability to effectively address the needs and aspirations of its citizens.

Design Weaknesses

The project demonstrates a comprehensive approach to tackling corruption and enhancing commercial dispute resolution. While this holistic design is commendable, it also presents some challenges that could potentially impact the project's effectiveness and efficiency.

- Involving numerous stakeholders and beneficiaries: The project's design involves a wide range of stakeholders and beneficiaries across various institutions and levels of government, reflecting the complex nature of governance in Iraq. However, engaging with such a large number of actors may increase the risk of not achieving the project's targets within the given timeframe and resources. Coordinating efforts, aligning priorities, and ensuring consistent commitment from all parties could prove challenging, potentially diluting the project's impact.
- Combining anti-corruption and arbitration in a single project: While there are potential synergies between anti-corruption efforts and the promotion of commercial dispute resolution, the project's design could have benefited from separating these two aspects. Anti-corruption initiatives often require different strategies, stakeholders, and resources compared to those needed for improving arbitration processes.

By acknowledging these weaknesses and adopting appropriate mitigation strategies, the project can enhance its effectiveness and impact in addressing the complex governance challenges facing Iraq.

Implementation Constraints

Reviewing the project's narrative reports, the ACAI project has faced several implementation constraints. These include initial delays in staff recruitment, especially international experts; COVID-19 related restrictions impeding activities; suspension of the KRI Parliament affecting work with that authority; volatile political situation and government formation delays impacting timely completion of some activities; limited participation of women, particularly in the justice

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[16] Bertelsmann Stiftung, BTI 2024: Iraq
[17] Ibidem
[18] Freedom House, Freedom in the World 2023

sector and political sphere; demands for support sometimes exceeding project scope; slower than planned adoption of reviewed anti-corruption legislation by the government; and delays in the action plan for the federal anti-corruption strategy hampering related interventions.

The project has sought to mitigate these challenges through adaptive management, stakeholder coordination, focusing on areas within its control, using technology and teleworking, rescheduling activities, and enhancing outreach and communication efforts to boost women's participation. Despite the complex political and security environment in Iraq and reliance on government processes for reforms, overall implementation has progressed, with the project working to navigate constraints and deliver on its objectives.

3. EVALUATION SCOPE AND OBJECTIVES

3.1 Evaluation Purpose

The purpose of this mid-term evaluation is to assess the overall progress of the ACAI project and inform UNDP management the project implementation team, and partners on how to improve ACAI performance (in terms of its activities, processes, and results) going forward. The evaluation aims to document intermediate results, capture lessons learned, and provide recommendations for strengthening the project's overall performance.

3.2 Evaluation Scope

The evaluation has a national scope, covering project activities across Iraq with a particular focus on the provinces of Baghdad and Erbil. It examines the period from 30 April 2021 to 12 June 2024, encompassing approximately three years of project implementation. As part of the evaluation methodology, a capacity assessment is conducted to provide an overall analysis of existing human resource and financial capacities within the project compared to what is needed for successful implementation of the remaining duration.

The evaluation covers all five project outputs and their respective activities, assessing progress towards the intended outcomes. The target stakeholders include key government institutions such as the Supreme Judicial Council, Commission of Integrity (Federal and Kurdistan), Council of Representatives, Kurdistan Region Shora Council, Federal and regional Prime Minister's Offices, Parliament, and Iraqi civil society organizations.

3.3 Evaluation Objectives

The specific objectives of this evaluation are to:

1. Document progress and results against the theory of change and results framework, assessing whether the activities and outputs delivered to date have been effectively implemented and how they have, or are expected to, contribute to outcomes and impact.
2. Review the design and effectiveness, examining whether activities, outputs, outcomes, objectives and performance indicators are sufficiently aligned to enable an assessment of project effectiveness.
3. Identify what has worked well and what has not, documenting good practices and lessons learned.
4. Provide recommendations on how ACAI could strengthen its results by better aligning its priorities and strengthening partnerships as envisioned by UNDP, EU, and the Government of Iraq.
5. Assess the extent to which the project has contributed to promoting gender equality and women's empowerment and provide recommendations for enhancing gender mainstreaming in the remaining project period.

3.4 Evaluation Criteria

The evaluation assesses the project's performance using the OECD-DAC evaluation criteria of relevance, coherence, efficiency, effectiveness, impact, and sustainability. These criteria were selected as they are widely recognized as best practice in development evaluation and provide a comprehensive framework for assessing project performance.

In addition, the evaluation includes additional criteria - scalability and replicability. These criteria were included to assess the project's potential for expansion and adaptation in other contexts, which is important for understanding the broader applicability of the project's approach.

The evaluation also mainstreams cross-cutting issues of human rights, gender equality, and capacity building throughout the analysis. These issues were selected due to their importance in UNDP's programming principles and their relevance to the project's objectives of promoting inclusive and sustainable anti-corruption efforts.

Furthermore, the evaluation examines the extent to which UN programming principles of the human rights-based approach to planning, gender equality, capacity development, and results-based management have been integrated throughout the project cycle. These principles are core to UNDP's development approach and their mainstreaming is essential for ensuring the project's alignment with UNDP's strategic priorities.

The specific questions and sub-questions under each criterion, along with the corresponding indicators, data sources, and methods, are detailed in the evaluation matrix (Annex 2). The matrix operationalizes these criteria, providing a structured framework for data collection and analysis.

3.5 Evaluation Questions

The evaluation addresses a set of questions across the evaluation criteria. The overall themes of these questions include:

- Relevance to national priorities and emerging global development agendas
- Coherence with other interventions and stakeholder involvement
- Efficiency of implementation strategy and resource utilization
- Effectiveness in achieving planned results and factors contributing to success
- Potential impact on target institutions and beneficiaries
- Sustainability of project results and exit strategies
- Scalability and replicability of project components
- Integration of human rights, gender equality, and capacity building throughout the project

These questions are designed to provide an in-depth assessment of performance and guide recommendations for improvement in the remaining implementation period.

The evaluation questions in the report are largely consistent with those provided in the Terms of Reference. However, some minor adjustments were made to the wording and organization of the questions to improve clarity and flow. For example, the questions related to relevance were slightly reordered, and the wording of some questions was modified to better align with the OECD-DAC criteria. Despite these minor changes, the overall scope and intent of the questions remain the same, ensuring that the evaluation comprehensively assesses the project's performance across the key evaluation criteria.

3.6 Limitations and Constraints

The evaluation faced several limitations and constraints that should be noted:

Data Collection Limitations:

- The evaluation relied predominantly on qualitative data due to the nature of the anti-corruption intervention and the types of data sources available. While this approach provides rich contextual information, it may limit the ability to quantify effects or make statistically robust comparisons. To mitigate potential biases, qualitative findings were triangulated across multiple data sources and stakeholder groups.

- Most of the interlocutors were male, reflecting the gender disparity in the male-dominated field in which the project operates. Despite these circumstances, the evaluator made deliberate efforts to prioritize the selection of female interlocutors where possible. As a mitigation measure, the report mainstreams Gender Equality and Social Inclusion (GESI) considerations throughout its analysis and recommendations.
- For interviews conducted in Arabic and Kurdish, reliance on translation introduced the possibility of nuances being lost or misinterpreted. To mitigate this, the evaluator conducted follow-up clarifications where necessary to ensure accurate interpretation of responses.
- Much of the data came from interviews and focus groups, which may be subject to recall bias or social desirability bias from participants. To address this limitation, the evaluator cross-referenced self-reported data with project documentation and other sources where possible. Additionally, probing questions were used, and specific examples were sought to verify and deepen understanding of participants' responses.

Data Analysis Limitations:

- While contribution analysis was used to assess the project's influence on observed changes, definitively attributing these changes to project activities in a complex environment remains challenging. The evaluation acknowledges this limitation and presents findings as contributions rather than direct attributions, considering alternative explanations and contextual factors.

Report Length Limitation:

- The Terms of Reference expressly prescribed a maximum of 40 pages for the draft evaluation report, including the Executive Summary. This constraint posed a challenge given the high number of evaluation questions (37) that required presentation of evidence and analysis to meet UNDP evaluation report guidelines. These guidelines stipulate that findings should be backed up by evidence, which can be space intensive. To mitigate this constraint, the following measures were taken:
    o Combination of several related evaluation questions, reducing the initial number from 44 to 37.
    o Use of structured approaches to present findings concisely while maintaining depth of analysis.
    o Careful prioritization of content to ensure the most important information is included within the page limit.

The evaluator carefully considered these limitations throughout the evaluation process and took appropriate mitigation measures to ensure the credibility and usefulness of the findings and recommendations presented in this report.

4. EVALUATION APPROACH AND METHODS

4.1 Evaluation Approach

This mid-term evaluation adopted a utilization-focused, theory-based approach to assess the ACAI project's progress, effectiveness, and potential for impact. This approach was chosen to ensure the evaluation findings would be practical and actionable for the project team and stakeholders, while also examining the underlying theory of change driving the project's interventions.

The utilization-focused approach was employed by actively involving key stakeholders, particularly the project team and donor, throughout the evaluation process. Their information needs and intended uses of the evaluation guided the design of the evaluation questions, data collection methods, and reporting format. Regular communication and validation of findings with these stakeholders ensured the evaluation would yield relevant and actionable recommendations.

The evaluation employed Contribution Analysis as its primary methodological framework. This approach allowed for an examination of theory of change against available data, logic, and assumptions, providing insights into how and why observed results have occurred. Contribution Analysis was particularly suitable given the complex, multi-stakeholder nature of anti-corruption efforts in Iraq and the need to understand the project's contribution within this context.

Gender equality, disability inclusion, and social inclusion considerations were integrated throughout the evaluation process. This included ensuring diverse representation in data collection, disaggregating data where possible, and analyzing findings through a GESI lens.

4.2 Evaluation Design

The evaluation utilized a non-experimental, mixed-methods design, with a predominant focus on qualitative data due to the nature of the intervention and the type of internal data sources produced. While some quantitative data was incorporated, the evaluation dealt mostly with qualitative information.

4.3 Data Sources

The evaluation drew upon multiple data sources, both qualitative and quantitative, to ensure a comprehensive and triangulated assessment:

Qualitative data sources:

- Document review: Project documents, progress reports, and relevant external literature were analyzed.
- Key informant interviews (KIIs): In-depth interviews were conducted with various stakeholders, including implementing agency interlocutors (UNDP staff and project team members), direct beneficiaries (representatives from government entities, CSOs, and training beneficiaries), and external stakeholders (EU Delegation, UNAMI Human Rights, and an academic institution). The interviews were conducted both online and offline, depending on the stakeholder group and availability.
- Focus group discussions (FGDs): Group discussions were held with the National Investment Committee and the KRI Bar Association.

Quantitative data sources:

- Project monitoring data: Data on training participants, cases monitored, laws reviewed, and other output indicators were analyzed to assess progress against targets.
- Financial data: Budget utilization and expenditure data were reviewed to analyze the efficiency of resource use.

These sources were selected based on their relevance to the evaluation questions and their ability to provide diverse perspectives on the project's performance. The combination of qualitative and quantitative data allowed for a robust assessment of the project's progress, effectiveness, and efficiency.

The evaluator also attended the launch of the Trial Monitoring Report in Baghdad on June 6th, 2024, an event organized by UNDP with EU funding, in collaboration with Iraq's Supreme Judicial Council and UNAMI's Human Rights Office.

A total of 30 interlocutors participated in the KIIs and FGDs, with 23 men (77%) and 7 women (23%). The gender balance varied among the different stakeholder groups: Group 1 had 11 interlocutors with 6 men (55%) and 5 women (45%); Group 2 had 16 interlocutors with 15 men (94%) and 1 woman (6%); and Group 3 had 3 interlocutors with 2 men (67%) and 1 woman (33%). There was a general effort to ensure gender balance in the demographics of interlocutors, with the best balance achieved among the population of Group 1 interlocutors. The fact that not all groups of interlocutors achieved gender balance is further reflected as a limitation and explained in the report.

A detailed list of all internal and external sources consulted, along with the gender and number of participants, is organized and presented in Annex 2 of the report.

4.4 Sample and Sampling Frame

The evaluator adopted a structured grouping approach to inform the data collection phase, delineating stakeholders into three principal groups:

- Group 1: Implementing Agency Interlocutors: This group included actors linked with the project's executing body, such as UNDP departmental personnel and project team members. A purposive sampling approach was employed to target individuals with insights into the project's implementation.
- Group 2: Direct Beneficiaries: This group consisted of stakeholders directly impacted by the project's interventions. Stratified sampling was used to categorize the beneficiary population into specific strata based on regional representation, delineating between federal and KRI levels. The interlocutors were selected based on their relevance to the project, serving as focal points and leading respective institutions that benefited from the assistance.
- Group 3: External Stakeholders: This group encompassed individuals and entities outside the project's direct implementation or beneficiary circle who offer valuable, expert perspectives. Snowball sampling was used to uncover additional knowledgeable stakeholders and ensure a diversity of viewpoints.

4.5 Data Collection Procedures and Instruments

Data collection methods included:

- Semi-structured interviews: Conducted with key informants using tailored interview guides.
- Focus group discussions: Facilitated using structured discussion guides.
- Document analysis: Review of project documentation and relevant external sources.

- Capacity assessment: An assessment of existing human resource and financial capacities within the project compared to what is needed for successful implementation of the remaining duration. This assessment was conducted through a combination of document review, interviews with project staff, and analysis of financial and human resource data.

Data was collected both online and offline. An initial round of data collection was conducted prior to the field visit to Iraq. This was followed by a field visit from May 30th to June 12th, 2024, during which the evaluation consultant traveled to Baghdad and Erbil to gather additional data. The consultant met with interlocutors who were not available for meetings earlier due to various reasons, further enriching the data collected.

4.6 Ethical Considerations

The evaluation adhered to UNEG Ethical Guidelines for Evaluation. Key ethical considerations included:

- Obtaining informed consent from all participants: Prior to interviews and focus group discussions, the evaluator explained the purpose, scope, and voluntary nature of participation, ensuring that all participants provided explicit consent.
- Ensuring confidentiality and anonymity of respondents: The evaluator protected the identity of all participants by removing names and identifying information from interview transcripts and evaluation reports.
- Conducting the evaluation with cultural sensitivity and respect for local customs: The evaluator familiarized with local cultural norms and customs and demonstrated respect for diversity in engagement with stakeholders.

These ethical safeguards were outlined in the evaluation inception report and monitored throughout the evaluation process. The evaluator also signed the UNEG Pledge of Ethical Conduct in Evaluation (Annex 11).

4.7 Gender, Equity, and Social Inclusion (GESI) Considerations

GESI considerations were integrated throughout the evaluation by:
- Ensuring diverse representation in the sample
- Disaggregating data by gender and other relevant categories where possible
- Analyzing how the project has addressed GESI issues in its design and implementation

5. DATA ANALYSIS

The data analysis process for this evaluation was designed to examine and interpret the collected information to address the evaluation questions and criteria. The approach focused primarily on qualitative analysis methods.

5.1 Data Cleaning and Preparation

The data cleaning and preparation process involved several steps to ensure the quality and usability of the collected information:

- Interview and focus group transcription: Interviews and focus groups were transcribed verbatim. For interviews conducted in Arabic and Kurdish, translation was used to ensure accuracy.
- Data coding: A coding framework was developed based on the evaluation questions and OECD-DAC criteria. This framework was used to code the transcripts and document review notes using qualitative data analysis software.
- Data organization: Coded data was organized thematically to facilitate analysis across different data sources and respondent groups.

5.2 Data Analysis Methods

The evaluation employed a primarily qualitative analysis approach, with some basic quantitative analysis of project monitoring data. The following methods were used:

1. Thematic analysis: This was the primary method used to analyze interview and focus group data. The process involved:
- Familiarization with the data through multiple readings of transcripts
- Coding of data using the pre-defined framework, with additional codes added inductively as new themes emerged
- Identifying patterns and relationships within and across themes
- Interpreting themes in relation to the evaluation questions and criteria

2. Content analysis: This method was applied to project documents and reports to categorize and analyze their content. It helped in tracking project progress, identifying key challenges, and understanding the evolution of project strategies over time.

3. Contribution analysis: This approach was used to assess the project's contribution to observed changes, considering alternative explanations and contextual factors. It involved:
- Gathering evidence on observed changes and the project's activities
- Assessing the strength of evidence for the project's contribution
- Considering alternative explanations and contextual factors

4. Basic quantitative analysis: Descriptive statistics were used to analyze project monitoring data, such as the number of people trained, or laws reviewed. This provided a quantitative backdrop to the qualitative findings.

5. Triangulation: Data from different sources and methods were compared and contrasted to identify consistencies, discrepancies, and patterns. This enhanced the validity and reliability of the findings.

Throughout the analysis, particular attention was paid to gender, equity, and social inclusion considerations. This included disaggregating data where possible and examining differential impacts and experiences across different groups.

5.3. Data Analysis Approach and Structure

The data analysis was structured to present key findings and themes that emerged from the coded and organized data. Each finding was presented with a concise and descriptive title, followed by an explanatory paragraph that provided more details and discussed the implications relevant to the evaluation questions and criteria. Evidence from the collected data, including quotations and examples, was then presented to support each finding.

The explanatory paragraphs triangulated the findings with data from different sources and respondent groups, addressing potential weaknesses or limitations when applicable. The interview and focus group transcripts were analyzed to assess consensus among participants regarding specific evaluation questions.

For each evaluation question, an analysis was provided to summarize the key insights gained from the data.

6. FINDINGS

The findings presented in this chapter are based on a rigorous analysis of the data collected during the evaluation process. They are structured around the evaluation criteria and questions to provide a clear and direct connection between the inquiries made and the corresponding findings. The findings are stated as facts derived from the evidence gathered. The findings also incorporate insights related to gender equality, women's empowerment, and other relevant cross-cutting issues.

6.1. Relevance

6.1.1. Identify contributions, gaps and/or opportunities for further progress to the country's development priorities as identified in both the project's and UNDP Iraq CPD results and indicators framework.

Contributions to UNDP Iraq CPD Results and Indicators

The project's objectives and outputs are strategically designed to directly support and contribute to UNDP Iraq's Country Programme goals of enhancing governance and accelerating progress towards the Sustainable Development Goals (SDGs). By focusing on strengthening anti-corruption mechanisms, improving the legislative framework, and building institutional capacities, the project aims to create a more transparent, accountable, and effective governance system in Iraq.

Evidence:
- The project directly contributes to UNSDCF/UNDP CPD Outcome 3.1, which aims to strengthen institutions and systems to deliver people-centered, equitable, and inclusive services, and CPD Output 2.1, which focuses on establishing open, accountable, and future-ready governance systems (Project Document, Executive Summary, UNSDCF[19]).
- The project's anti-corruption outputs, such as improving the legislative and strategic framework (Output 1) and enhancing the capacities of the justice sector and Commission of Integrity (Output 2), are specifically designed to strengthen institutions and promote accountability (Project Document, Results Framework).
- The project's results framework includes output indicators that directly align with and contribute to CPD Output 2.1 indicators. For example, the project tracks the number of anti-corruption legislative documents drafted or reviewed (Output 1 Indicator i), the number of public officials trained on anti-corruption topics (Output 1 Indicator iii), and the progress in developing codes of conduct for the judiciary and Commission of Integrity (Output 2 Indicator v) (Project Document, Results Framework). These indicators mirror the CPD Output 2.1 indicators on strengthening accountability and mitigating corruption risks (CPD Results Framework[20]).
- The narrative reports provide examples of the project's contribution to the achievement of CPD Outcome results and indicators. For instance, the project supported the development of implementation plans and oversight mechanisms for the Federal and KRI Anti-Corruption Strategies (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.3) and conducted capacity building workshops on corruption risk assessment and legislative impact assessment for public officials (ACAI Narrative Report

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[19] United Nations, United Nations Sustainable Development Cooperation Framework (UNSDCF) for Iraq (New York: United Nations, 2021), https://iraq.un.org/en/143250-united-nations-sustainable-development-cooperation-framework-iraq-unsdcf

[20] United Nations Development Programme (UNDP), Country Programme Document for Iraq (2020-2024) (New York: UNDP, 2020), https://www.undp.org/iraq/publications/country-programme-document-iraq-2020-2024

30th of April 2021- 29th of April 2022, Activity 1.4). These activities directly contribute to enhancing governance and strengthening institutions to combat corruption, as envisioned in the CPD Outcome 3.1 and Output 2.1.

Identified Needs and Stakeholder Requests for Anti-Corruption Initiatives

Legislative and capacity needs persist in Iraq's anti-corruption framework, necessitating targeted interventions to strengthen institutional effectiveness. Iraqi authorities at both federal and Kurdistan Region (KR) levels have identified specific issues and gaps that require attention.

Evidence:
- Legislative and strategic gaps remain in fighting corruption that the project aims to address, such as the need to update anti-corruption legislation in line with UNCAC[21] and establish oversight mechanisms for anti-corruption strategies. (Project Document, Strategy)
- There are capacity needs in public institutions investigating and adjudicating corruption cases in terms of technical skills and integrity systems that the project seeks to improve. (Project Document, Strategy)
- The Federal Commission of Integrity requested UNDP support in developing a comprehensive implementation and oversight mechanism for the Anti-Corruption Strategy. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.3)
- The Kurdistan Region of Iraq Commission of Integrity sought assistance in drafting a regulation for implementation and oversight of the KRI Anti-Corruption Strategy, as well as setting up a unit to monitor strategy implementation. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.3)
- Both federal and KRI authorities expressed the need for specialized training in corruption risk assessment and legislative impact assessment, with at least six institutions showing interest in these capacity-building activities. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.4)
- The project received requests for support in reviewing and improving key legislation, including the Access to Information Draft Law, draft Penal Code, Shura Council Draft Law, and Judicial Oversight Authority Draft Law. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.1)

Analysis

The project demonstrates strategic alignment with Iraq's development priorities and UNDP's country program objectives, while addressing gaps in the anti-corruption framework. Its focus on strengthening anti-corruption entities and reforming legislative frameworks directly supports both national goals and UNDP's broader governance objectives.

The project's approach is notably comprehensive, targeting legislative reform, institutional capacity building, and economic development through improved commercial dispute resolution. This integrated strategy addresses systemic weaknesses in Iraq's anti-corruption efforts, particularly in updating legislation to meet international standards and enhancing the technical capabilities of relevant institutions.

By leveraging the current supportive political climate and Iraq's recent accession to international conventions, the project capitalizes on timely opportunities for reform. This approach, combined with its targeted focus on identified gaps, positions the project to potentially accelerate progress in anti-corruption efforts and governance improvements.

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[21] United Nations Office on Drugs and Crime (UNODC), United Nations Convention against Corruption (New York: United Nations, 2004), https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf

6.1.2. Is the current project's assistance still relevant and appropriate to the national priorities, and emerging global development agenda?

Alignment with National Priorities

The project maintains strong relevance to Iraq's national anti-corruption priorities and aligns closely with global sustainable development objectives, particularly in strengthening governance and institutional effectiveness.

Evidence:
- The new Iraqi Prime Minister identified anti-corruption efforts and administrative reforms as key priorities in the Government Programme. (ACAI Narrative Report January 2023 - 8 October 2023, Situation Update. UN Press Release[22])
- A Memorandum of Understanding (MoU) was signed between the Prime Minister's Office and UNDP in April 2023, reaffirming the partnership and commitment to preventing and combating corruption in Iraq. The MoU builds on UNDP's current support to respond to anti-corruption priorities in line with the UN Convention Against Corruption (UNCAC). (ACAI Narrative Report January 2023 - 8 October 2023, Situation Update)
- The project's support in reviewing and drafting key anti-corruption legislations such as the Access to Information Law, Asset Recovery Law, and Public Procurement Law aligns with the government's priorities to strengthen the anti-corruption legal framework. (ACAI Narrative Report January 2023 - 8 October 2023, Output 1.1)
- Multiple key informants, including those from government institutions and external stakeholders, emphasized that anti-corruption is the number one challenge for Iraq. They noted that the project's relevance was confirmed by various entities, including the Commission of Integrity, government bodies, and judicial institutions from the outset.
- Key informants involved in project implementation noted that the project's focus on capacity building for institutions such as the judiciary, Commission of Integrity, and Ministry of Planning aligns with the need to drive change from within and complements the government's anti-corruption efforts.

Relevance to the Global Development Agenda

The project's focus on anti-corruption and institutional strengthening directly contributes to global sustainable development goals, SDG 8 and 16, and aligns with UNDP's strategic priorities for governance improvement.

Evidence:
- UNDP's Strategic Plan (2022-2025) Output 2.1 focuses on "open, agile, accountable, and future-ready governance systems in place to co-create and deliver solutions to accelerate SDG achievement." The project aligns with this output by strengthening anti-corruption institutions and promoting commercial dispute resolution. (ACAI Narrative Report 30 April 2021- 29 April 2022, Project Summary Sheet, UNDP's Strategic Plan 2022-2025[23])
- The project supports Iraq's implementation of the UN Convention Against Corruption (UNCAC)[24]. Iraq is currently undergoing its second cycle UNCAC review, and the project's assistance in legislative reforms and

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[22] United Nations, "Iraqi Prime Minister highlights national priorities focused on people," UN News, September 22, 2023, https://news.un.org/en/story/2023/09/1141367

[23] United Nations Development Programme (UNDP), UNDP Strategic Plan 2022-2025 (New York: UNDP, 2022), https://strategicplan.undp.org

[24] United Nations Office on Drugs and Crime (UNODC), United Nations Convention against Corruption (New York: United Nations, 2004), https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf

capacity building contributes to meeting Iraq's obligations under the Convention. (ACAI Narrative Report January 2023 - 8 October 2023, Output 1)

- Some respondents emphasized that addressing corruption is essential for Iraq's stability and security, and by extension, the wider neighborhood and Europe, as it is a root cause of instability, demonstrations, lack of trust in institutions, and irregular migration.
- Project team members highlighted that the emphasis on promoting transparency and anti-corruption measures contributes to creating an enabling environment for private sector development and foreign investment, which they view as essential for Iraq's economic diversification and sustainable development.

Analysis

The project's assistance remains highly relevant and appropriate to Iraq's national priorities and the global development agenda. It aligns closely with the government's anti-corruption efforts. This is evident from the signed Memorandum of Understanding between the Prime Minister's Office and UNDP, which reinforces the partnership against corruption. The project's involvement in reviewing and drafting key anti-corruption laws, such as the Access to Information Law and Public Procurement Law, addresses national priorities and strengthens the anti-corruption legal framework.

Globally, the project aligns with SDG 8 decent work and economic growth, and SDG 16, promoting inclusive societies, access to justice, and effective institutions. By focusing on capacity building for the judiciary and the Commission of Integrity, it supports UNDP's Strategic Plan (2022-2025) for open and accountable governance systems. The project's support for Iraq's implementation of the UN Convention Against Corruption during its review cycle shows its contribution to fulfilling international obligations. Promoting transparency and anti-corruption measures also creates an environment conducive to private sector development and foreign investment, essential for Iraq's sustainable development. This demonstrates the project's continued relevance and appropriateness to both national and global priorities.

6.1.3. To what extent is the project relevant to beneficiary needs?

Addressing Legislative and Strategic Gaps in Anti-Corruption Efforts

The project demonstrates high relevance in addressing legislative and strategic gaps in anti-corruption efforts, responding directly to the need for legal framework and effective implementation strategies at both federal and KRI levels.

Evidence:
- UNDP's review of the anti-corruption legal framework in Iraq identified compliance gaps with UNCAC and provided recommendations for legislative reforms. (ACAI Narrative Report 30 April 2021- 29 April 2022, Output 1.1)
- The project supported the Federal and KRI Commissions of Integrity (CoIs) in developing implementation plans and oversight mechanisms for their Anti-Corruption Strategies, responding to the need for effective strategy implementation. (ACAI Narrative Report 30 April 2021- 29 April 2022, Output 1.3)

Enhancing Anti-Corruption Capacities Across Multiple Stakeholder Groups

The project's extensive capacity building and training initiatives across multiple stakeholder groups, including public officials, judges, prosecutors, civil society activists, and journalists,

demonstrate high relevance to beneficiary needs for enhanced skills and knowledge in combating corruption.

Evidence:
- 1,001 public officials (246 women) were trained on legislative drafting, international anti-corruption standards, corruption risk assessments, and other priority topics, addressing capacity needs in key institutions. (ACAI Narrative Report January 2023 - 8 October 2023, Output 1.2)
- 289 judges, prosecutors, and CoI officials were trained on investigation techniques, illicit enrichment, digital forensics, and other skills for investigating and prosecuting corruption cases. (ACAI Narrative Report January 2023 - 8 October 2023, Output 2.2)
- 26 civil society activists and journalists from across Iraq received training on investigative reporting on corruption, responding to the need for enhanced civil society capacity to monitor and report on corruption. (ACAI Narrative Report 30 April 2021- 29 April 2022, Output 5.3)
- Interviews with project beneficiaries revealed that the training programs provided participants with valuable skills in areas such as legal protection for investigative journalism, interviewing techniques, and evidence-gathering
- The high level of participation in training events, as evidenced by feedback from direct beneficiaries, indicates strong demand and relevance of capacity building initiatives across various stakeholder groups.

Improving Commercial Dispute Resolution Mechanisms

The project's focus on improving commercial dispute resolution mechanisms, including support for key legislation and promotion of alternative dispute resolution, demonstrates strong relevance to the needs of the business community and legal professionals in creating a more efficient and trusted framework for resolving commercial disputes.

Evidence:
- UNDP is supporting the finalization of the Arbitration Law, aligning it with international standards to create a legal framework for commercial arbitration in Iraq. (ACAI Narrative Report January 2023 - 8 October 2023, Output 3.1)
- The project conducted a resource needs assessment of civil/commercial courts, identifying gaps and recommendations to enhance the efficiency of commercial dispute resolution, responding to the needs of businesses and investors. (ACAI Narrative Report January 2023 - 8 October 2023, Output 3.2)
- Workshops on the New York Convention and the MoU with the American University of Baghdad aimed to build capacity and promote education in commercial arbitration, addressing the need for skilled professionals in this field. (ACAI Narrative Report January 2023 - 8 October 2023, Output 3.3)
- Certain interviewees highlighted the lack of curriculum and legal framework for alternative dispute resolution in Iraq, indicating a clear need for the project's interventions in this area.

Addressing Security Needs of Vulnerable Stakeholders

While the project demonstrates some relevance in addressing the security needs of beneficiaries through training on legal instruments and measures, there is a clear need for more comprehensive legal protection and support, particularly for journalists and activists working in high-risk environments.

Evidence:
- During the training for civil society and journalists on investigative reporting, a session was dedicated to whistleblower protection and maintaining source anonymity, recognizing the security risks faced by those exposing

corruption. (ACAI Narrative Report January 2023 - 8 October 2023, Output 5.3)
- Some respondents suggested that while the project provided training on legal instruments and measures for personal security, the security situation in Iraq necessitates more comprehensive legal protection and support.
- See Annexes 3, 4, 5 for additional evidence on this aspect.

Analysis

The project demonstrates high relevance to beneficiary needs across key areas of Iraq's anti-corruption landscape. Its focus on addressing legislative and strategic gaps, particularly in aligning with UNCAC standards and supporting strategy implementation, responds to needs in the legal and policy framework.

The extensive capacity building initiatives across diverse stakeholder groups, including public officials, justice sector professionals, and civil society actors, address skill deficits. High participation rates and positive feedback indicate strong demand and relevance of these programs.

The project's emphasis on improving commercial dispute resolution mechanisms is particularly relevant to the business community's needs, potentially contributing to a more favorable investment climate.

The evidence suggests that further measures are needed to bolster the security of civil society organizations, particularly regarding legal protections and personal safety. These enhancements would enable them to more effectively conduct investigative journalism focused on corruption.

6.1.4. To what extent do the project's assumptions hold true in the current context?

The project document contains both explicit and implicit assumptions that underpin its approach and Theory of Change. Further in this sub-chapter, both types of assumptions will be analyzed.

Explicit Project Document Assumptions

Assumption: Sufficient levels of security and political stability prevail that allow implementation of project activities

Political instability and security challenges have impacted project implementation, necessitating adaptations in activity planning and execution.

Evidence:
- The narrative report covering the timeframe of April 30, 2022, to December 31, 2022, indicate that the volatile political situation in the country posed obstacles in timely identification and completion of activities, particularly those related to Parliament and Government formation. (Progress Report Apr-Dec 2022, Challenges and Mitigation Measures section)
- The suspension of the KRI Parliament by the Supreme Court delayed the project's work with the respective authority, leading to under-achievements in targets. (Progress Report Apr-Dec 2022, Output 1 section)
- The project implementation timeline was marked by a widespread political crisis in Iraq. The supporters of the Shiite cleric Muqtada Al-Sadr arranged protests across Iraq between June and November 2022 and stormed the heavily guarded Green Zone which houses the parliament, government buildings, embassies, and the United Nations offices. (Progress Report Apr-Dec 2022, Situation Update section)
- Several informants noted that the security situation in Iraq remains challenging with the presence of militias and armed groups, making life difficult for those working on sensitive issues like corruption.

Assumption: Existing and potential health pandemics stabilize allowing timely project implementation

While COVID-19 impacts were tangible, the project has adapted its operations to mitigate pandemic-related disruptions and maintain implementation progress.

Evidence:
- The project document, prepared in early 2021, identified the risk of global pandemics like COVID-19 that could impact Iraq and the project's overall operational environment. It noted that lockdown measures and movement restrictions for UN personnel in Iraq may result in a delayed start to activity implementation and overall project delays. The recruitment of new project personnel may also be subject to delays, including arrival to the duty station. The majority of project staff may have to telecommute from home, leading to a minimal or total absence of their field presence. (Project Document, Risk Log)
- The progress report for April 2021 to April 2022 mentioned that COVID-19 became a major impediment due to related lockdowns and restrictions on gatherings and travel under COVID Standard Operating Procedures (SOPs), which slowed the pace of implementation. However, UNDP and its partners have adapted to smart ways of conducting office work using technology and teleworking. (Progress Report Apr 2021-Apr 2022, Lessons Learnt section)

Assumption: Resources for project activities are available on time

Financial resources have been efficiently allocated and utilized, with no significant delays reported in fund disbursement from donors.

Evidence:
- The project has allocated resources to the corresponding outputs as per the agreement with the EU. The project is currently on track with its objectives and is efficiently utilizing the resources allocated. (Progress Report Apr 2021-Apr 2022, Management Effectiveness Review section)
- Key informants with knowledge of the project's financial operations reported that there were no delays from the donor in releasing payments. They noted that the project budget was prepared considering all aspects, which has reportedly helped smooth implementation.

Assumption: Key stakeholders continue to show willingness to engage and are receptive and responsive to the project

Stakeholder engagement has been generally positive, particularly among government institutions, though parliamentary responsiveness has been a challenge in some areas.

Evidence:
- 434 public officials (96 women) and parliamentarians attended workshops and trainings organized by the project. (Progress Report Apr-Dec 2022, Output 1 section)
- Judges, prosecutors and CoI officials participated in trainings on investigation and adjudication subjects. (Progress Report Apr-Dec 2022, Output 2 section)
- Workshops engaged legislators, government, private sector and civil society across Iraq in discussions on the Arbitration Bill. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- Multiple interviewees from diverse backgrounds reported that key government stakeholders, such as the Judicial Council and Commission of Integrity, have shown strong engagement. It was noted that the judiciary's

open sharing of data for trial monitoring represents an unprecedented level of access.
- Some respondents observed that parliament has shown less responsiveness, which they linked to delays in adopting anti-corruption legislation.

Assumption: Access to target locations in and outside Iraq is possible

The project document identifies access to target locations as a key assumption. While no specific evidence was found regarding access issues during the reporting periods, this assumption is closely linked to the security and political stability assumptions discussed above.

Evidence:
- The volatile security situation and political instability, as noted under the respective assumptions, could potentially affect access to target locations. However, no direct access issues were reported in the reviewed documents.

Implicit Assumptions Concerning Anti-Corruption in Theory of Change

Assumption: Strengthening the justice sector's capacity and integrity through training and improved codes of conduct will result in the justice sector being better able to investigate, prosecute and adjudicate acts of corruption

Capacity building efforts have shown positive results in improving the justice sector's ability to handle corruption cases, with progress in developing and implementing codes of conduct.

Evidence:
- Judges, prosecutors and CoI officials were trained on investigation and adjudication subjects. (Progress Report Apr-Dec 2022, Output 2 section)
- The project is working with judiciaries and CoIs in developing codes of conduct. The code of conduct for the federal judiciary was published and adopted, while the KRI code of conduct was drafted and submitted for adoption. (Progress Report Apr-Dec 2022, Output 2 section)
- Key informants reported that after trainings on illicit enrichment investigation, the number of such investigations by the integrity commission increased, indicating improved capacity.

Assumption: Improving the strategic and legislative environments, enhancing awareness of anti-corruption, and fostering active participation of parliamentarians, civil society and media in anti-corruption issues will create a culture of integrity

While progress has been made in engaging various stakeholders, more efforts are needed to fully realize a culture of integrity, particularly in parliamentary engagement and civil society participation.

Evidence:
- 434 public officials (96 women) and parliamentarians attended workshops and trainings on legislative drafting, corruption risk assessment, international standards etc. (Progress Report Apr-Dec 2022, Output 1 section)
- 16 civil society and media organizations were trained on responsible reporting on corruption cases. (Progress Report Apr-Dec 2022, Output Indicators table)
- The project supported the Kurdistan Regional Government in launching a special hotline to receive corruption complaints, encouraging citizen reporting while ensuring confidentiality. (Progress Report Apr-Dec 2022, Output 5 section)

- Interviewees noted that the project trained a cohort of activists and journalists on anti-corruption investigation and reporting. However, some suggested more could be done to actively engage civil society in legislative reviews and advocacy.
- Some respondents observed that parliamentary engagement in anti-corruption awareness has been limited, with few sessions on the UN Convention Against Corruption.
- Additional evidence specifically on validity of this assumption is presented in the analysis of outputs fulfillment and overall context, presented in Annex 8 and Chapter "Description of the Intervention Being Evaluated".

Assumption: The adoption of new modern legislation, integration of international anti-corruption standards, communicating lessons learned, and establishing an effective trial monitoring mechanism will increase accountability, transparency and integrity of the judiciary system and effectively contribute to curbing corruption in Iraq

Legislative reforms and trial monitoring have shown promise in improving judicial transparency and accountability, though obstacles remain in fully adopting and implementing new anti-corruption measures.

Evidence:
- The project reviewed several anti-corruption draft laws and provided recommendations to align them with international standards. The Iraqi Council of Ministers approved the draft Access to Information law in October 2022, with plans for parliamentary review and endorsement. (Progress Report Apr-Dec 2022, Output 1 section)
- A trial monitoring program was established and is operational. The first Trial Monitoring Report, covering August 2022 to April 2023, was completed with plans for sharing with the judiciary for discussion and feedback. (Progress Report Apr-Dec 2022, Output 2 section)
- Project beneficiaries reported that the trial monitoring identified strengths and weaknesses in anti-corruption adjudication. Sharing the findings reportedly increased the judiciary's openness to allowing CSO observers.
- Several interviewees noted that adopting new anti-corruption legislation has been challenging due to limited parliamentary engagement.

Implicit Assumptions Concerning Dispute Resolution in Theory of Change

Assumption: Enhancing access to informal justice and promoting informal dispute resolution mechanisms through legislative reform, institutional development, and capacity building will provide a secure investment climate that attracts more local and international investments

Progress has been made in legislative reforms and capacity building for alternative dispute resolution, but further improvements are needed to impact the investment climate.

Evidence:
- The project revised and drafted 3 legislations compatible with more than 12 best practices to enhance access to ADR mechanisms, including revisions to the Arbitration Bill and the Iraqi Trade Law. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- Training workshops were provided for 45 judges, public servants, arbitrators and mediators (21 women) to enhance their capacities. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- A commercial court was established in the Kurdistan Region of Iraq based on recommendations made to the Higher Judicial Council in October 2022

during the inception phase. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- Key informants highlighted recent positive developments, including Iraq joining the Singapore Convention on Mediation[25] and increased engagement of businesses in arbitration workshops.
- However, some interviewees pointed out that the lack of a standalone arbitration law and limited professional capacity are current constraints to a conducive investment climate.

Assumption: Achieving a comprehensive legislative framework compatible with international conventions, enhanced institutional and individual capacities, and a modern commercial dispute resolution system with efficient proceedings will boost understanding and conduct of arbitration proceedings

Efforts to align with international conventions and enhance dispute resolution capacities have shown positive results, though gaps remain in fully establishing a comprehensive and efficient commercial dispute resolution system.

Evidence:
- The project advocated for and provided legislative proposals for Iraq's accession to the Singapore Convention on Mediation. The Cabinet agreed to take essential steps towards accession upon submission of the legislative proposal. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- Preliminary assessments were conducted for the Federal Commercial Court, KRG Commercial Court and the Court of First Instance, and the Enforcement Departments to identify gaps. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- Training workshops resulted in a 75% improvement in participants' knowledge and skills in ADR. (Progress Report Apr 2021-Apr 2022, Output 3 section)

Analysis

The project's assumptions hold true to varying degrees in the current context:

The assumption of sufficient security and political stability has not fully held. Political volatility, including protests and the suspension of the KRI Parliament, has impacted project activities. The persistent security obstacles, particularly for those working on corruption issues, demonstrate the fragility of the operating environment.

The assumption regarding health pandemics has largely held true. Despite obstacles from COVID-19, the project and its partners have adapted through technology and teleworking, allowing for continued implementation.

The assumption about timely availability of resources holds true. The project is on track with its objectives and efficiently utilizing allocated resources, with no reported delays in donor payments.

The assumption of stakeholder willingness to engage partially holds. There is strong engagement from key government entities like the Judicial Council and Commission of Integrity. However, the parliament's lower responsiveness in adopting anti-corruption legislation indicates varied levels of stakeholder commitment.

The assumption about access to target locations is supported, as no specific access issues were reported.

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[25] John Lee, "Iraq signs Singapore Convention on Mediation," Iraq Business News, May 1, 2024, https://www.iraq-businessnews.com/2024/05/01/iraq-signs-singapore-convention-on-mediation/#google_vignette

The assumptions underlying the project's theory of change hold true to varying degrees:

For the anti-corruption component:

The assumption that strengthening justice sector capacity and integrity will improve corruption case handling partially holds true. Training has led to increased investigations, and codes of conduct have been developed. However, the full impact on prosecution and adjudication is not yet evident.

The assumption that improving strategic and legislative environments and enhancing awareness will create a culture of integrity holds to a limited extent. While trainings have been conducted and some mechanisms for citizen engagement established, parliamentary involvement remains limited.

The assumption that adopting new legislation, integrating international standards, and establishing trial monitoring will increase accountability partially holds. Progress has been made in legislative reviews and trial monitoring, but obstacles remain in parliamentary adoption of new laws.

For the dispute resolution component:

The assumption that enhancing access to informal justice will provide a secure investment climate holds to some degree. Legislative reforms and capacity building efforts have been initiated, but the lack of a standalone arbitration law and limited professional capacity remain constraints.

The assumption that achieving a comprehensive legislative framework and enhanced capacities will boost arbitration proceedings partially holds. Progress has been made in legislative proposals and training, but the full impact on arbitration conduct is not yet clear.

6.1.5. Has the project recognized and effectively responded to urgent and emerging priorities which were not originally in the project?

Responsiveness to Emerging Needs

The project has shown proactive engagement with emerging priorities, expanding its scope to address newly identified needs in anti-corruption efforts and dispute resolution mechanisms.

Evidence:
- During the inception phase, a need was identified for a high-level anti-corruption dialogue forum, even though this was not part of the original project document. Terms of reference were developed for establishing this forum. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.5)
- In the legislative review, several additional laws were identified for review and drafting that were not originally planned, in order to meet emerging government priorities. This included the Code of Criminal Procedure and draft law on Conflict of Interest in 2022. (ACAI Narrative Report 30th of April 2022 - 31st of December 2022, Activity 1.1)
- A new need emerged to support both the Federal and KRI Commissions of Integrity in establishing digital forensic laboratories. The project supported the design of the lab's conceptual framework and operational procedures. This was an unplanned activity responding to an identified capacity gap. (ACAI Narrative Report January 2023 - 8th October 2023, Activity 2.2)
- Respondents outlined that, In response to the Commission of Integrity's (COI) request for more digitalization support, the project established digital forensic labs. It also conducted an assessment of COI's case management system to propose improvements, although getting approval took time.

- Interviewees reported that the project added the Singapore Convention on Mediation[26] to its workplan when Iraq expressed interest in joining. This was described as an unplanned activity that the project undertook to support emerging government priorities.

Effectiveness of Unplanned Interventions

Unplanned interventions have yielded positive outcomes, with opportunities to further align technical assistance with long-term institutional needs.

Evidence:
- The review of additional draft laws beyond the original plan, such as the Penal Code, Access to Information and Procurement laws, led to the government incorporating many of UNDP's legislative recommendations. This demonstrates the effectiveness of expanding the legislative review in response to needs. (ACAI Narrative Report January 2023 - 8th October 2023, Activity 1.1)
- Supporting the Federal Commission of Integrity to establish a digital forensic lab is enabling them to retrieve and analyze digital evidence in corruption cases in a forensically sound manner. This unplanned activity is strengthening a key capacity gap. (ACAI Narrative Report January 2023 - 8th October 2023, Activity 2.2)
- However, the Federal Commission of Integrity has expressed concern that the project may not have adequately prioritized providing technical assistance that could have long-term impacts and support infrastructure for governance and digital transformation on the preventive side (Inputs received during validation of the Evaluation Report)
- Representatives from the National Investment Commission found the project's support in awareness raising on arbitration very useful, as this is a new area for Iraq. They reportedly requested to be more involved in future events as a key stakeholder.
- Several respondents viewed Iraq joining the Singapore Convention on Mediation with project support as an important milestone. They suggested it opens up opportunities for the project to provide more support on this emerging priority area.
- While the project has demonstrated effectiveness in addressing some emerging priorities, such as establishing digital forensic laboratories, the Federal Commission of Integrity has expressed concern that the project may not have adequately prioritized providing technical assistance that could have long-term impacts and support infrastructure for governance and digital transformation on the preventive side. This feedback suggests that there may be opportunities for the project to further align its technical support with the needs and priorities of key stakeholders like the CoI.

Analysis

The ACAI project has demonstrated agility in recognizing and responding to urgent and emerging priorities beyond its original scope. This adaptability is evident from the inception phase, where strategic modifications were formalized through a project document amendment, setting the stage for flexible implementation. Throughout its course, the project skillfully incorporated new stakeholders and expanded its focus to align with evolving national priorities, exemplified by the engagement of the National Investment Commission and the broadened legislative review. The project's rapid adaptation to COVID-19

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[26] United Nations, Singapore Convention on Mediation (Singapore: United Nations, 2019), https://www.singaporeconvention.org

constraints through online training and e-learning solutions ensured uninterrupted capacity building efforts.

Most notably, significant unplanned interventions, such as establishing digital forensic laboratories and supporting Iraq's engagement with the Singapore Convention on Mediation, addressed emerging needs. The effectiveness of these responsive actions is reflected in tangible outcomes, including the adoption of legislative recommendations and enhanced digital forensic capabilities in corruption investigations. However, the Federal Commission of Integrity has highlighted that while these interventions are valuable, there is a need for the project to further prioritize technical assistance that establishes promising infrastructure in the field of governance and digital transformation, activating the preventive side of anti-corruption efforts. This feedback suggests opportunities for the project to build upon its adaptive approach by more strategically aligning its technical support with long-term institutional needs and priorities.

Despite this area for potential enhancement, the project's overall flexible implementation strategy has substantially increased its relevance and potential for sustainable impact in Iraq's anti-corruption landscape. The ACAI project has effectively recognized, responded to, and delivered impactful results on urgent and emerging priorities, enhancing its overall effectiveness and value to stakeholders. By thoughtfully considering the Federal Commission of Integrity's feedback in its future implementation, the project can further strengthen its alignment with key institutional needs and maximize its long-term impact on Iraq's anti-corruption framework.

6.1.6. How were stakeholders involved in the project's design and implementation?

Stakeholder Engagement in Project Design

Extensive consultations with diverse stakeholders ensured relevance, alignment with national priorities, and fostered ownership

Evidence:
- The project document indicates that UNDP consulted with relevant public institutions including CoIs, Higher Judicial Council, Parliament and the Prime Minister Offices at federal and regional level during the scoping mission in the third quarter of 2020. (Project Document, Context section)
- Consultations with stakeholders allowed ensuring project activities are tailored to the needs of stakeholders while considering the context of Iraq. (Project Document, Context section)
- Several interviewees emphasized that the project's design was based on extensive consultations with Iraqi government and institutions, confirming its relevance and alignment with national priorities.
- Multiple respondents highlighted that the project's design involved consultations with various stakeholders, including government officials, UN agencies, and civil society organizations, fostering a sense of ownership among key actors.

Stakeholder Input During Inception Phase

Stakeholder consultations led to project adjustments, ensuring continued relevance and effectiveness

Evidence:
- An Inception Report[27] was conducted by experts after project signature, identifying needs and gaps in detail and proposing specific activities, outputs and outcomes. (Project Document, Project Activities, Outputs and Outcomes section)

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[27] Inception Report for EU ACAI

- Throughout the Inception Phase, fourteen laws were reviewed, and more than 30 meetings conducted with governmental institutions, civil society, corporates, and international community members in Iraq and KRI to identify gaps and relevant activities. (Progress Report Apr 2021-Apr 2022, Output 3 section)
- Key informants confirmed that during the project's inception period, a series of meetings with stakeholders and an assessment of activities were conducted, leading to necessary adjustments to ensure the project's continued relevance and effectiveness.
- Some interviewees mentioned that the project's budget and activities were revised based on the inception period consultations, further underscoring the importance of stakeholder input in refining the project's design.

Coordination Mechanisms

Establishment of forums for ongoing stakeholder engagement and coordination facilitated information sharing and collaborative problem-solving

Evidence:
- An Anti-Corruption Coordination Forum was established, bringing together international partners to discuss anti-corruption policies, strategies and required support. 5 meetings were held in the first year. (Progress Report Apr 2021-Apr 2022, Activity 1.6)
- Respondents outlined the existence of an Anti-Corruption Coordination Forum, which brings together international partners and Iraqi government institutions to discuss anti-corruption efforts and share information, facilitating ongoing stakeholder engagement and coordination.
- The Project Steering Committee provides a platform for key stakeholders to review performance, identify solutions to obstacles, and provide strategic guidance. (Project Document, Governance and Management Arrangements section)
- Several informants referenced the project's engagement with the Iraqi government through regular meetings and consultations, suggesting the presence of coordination mechanisms to facilitate collaborative problem-solving and ensure alignment with national priorities.

Analysis

The ACAI project demonstrates a strategic approach to stakeholder involvement throughout its lifecycle. From the design phase through implementation, the project has engaged a diverse range of stakeholders, including government institutions, civil society organizations, and international partners.

During the design and inception phases, extensive consultations were conducted to ensure the project's relevance and alignment with national priorities. These consultations led to necessary adjustments, enhancing the project's responsiveness to identified needs and gaps. The implementation phase has seen active stakeholder participation in capacity-building activities, workshops, and training sessions, promoting collaboration across different sectors involved in anti-corruption efforts.

The establishment of coordination mechanisms, such as the Anti-Corruption Coordination Forum and the Project Steering Committee, has facilitated ongoing engagement and collaborative problem-solving.

6.1.7. Quality of the Project Design

To what extent were lessons learned from other relevant projects considered in the design?

Incorporation of lessons from previous UNDP anti-corruption projects in Iraq

Clear evidence of explicit incorporation of lessons from specific previous projects, with direct influence on project design

Evidence:
- According to the Project Document (section II. Project Strategy), UNDP closed its previous program to support the development of a National Corruption Index (NCI) in December 2020. Key lessons from the NCI project that informed the ACAI project design include:
  o The politically volatile environment that resulted in dissolution of key partners was mitigated by setting up ad hoc teams within ministries to fill the capacity gap.
  o The one-year timeframe was too short for developing and implementing such a tool. Indexes require a few years to be improved and tailored to context.
  o The NCI allowed identification of corruption problems that now need detailed diagnosis through corruption risk assessments.
  o Capacity building empowered public officials to better understand corruption problems.
- The Project Document also states that UNDP's previous Anti-Corruption Trust for Iraq (ACT Iraq) project started in April 2020 provided two key lessons:
  o The anti-corruption strategies lack an implementation plan and monitoring mechanism that can be enhanced under ACAI.
  o Legislative drafting will benefit from international best practices and compliance with international norms and standards.

Analysis

The ACAI project design demonstrates a deliberate and effective incorporation of lessons learned from previous UNDP anti-corruption initiatives in Iraq, particularly the National Corruption Index (NCI) and Anti-Corruption Trust for Iraq (ACT Iraq) projects. This integration of past experiences shaped ACAI's approach, addressing key obstacles and opportunities identified in earlier efforts.

From the NCI project, ACAI adopted strategies to mitigate political volatility, implemented a more realistic timeframe for tool development, and focused on detailed corruption risk assessments. Lessons from ACT Iraq informed ACAI's emphasis on implementation plans and monitoring mechanisms for anti-corruption strategies, as well as the incorporation of international best practices in legislative drafting.

This strategic application of lessons learned reflects a commitment to adaptive programming and continuous improvement. By directly addressing past obstacles and building on successful approaches, ACAI's design exhibits a context-specific approach to anti-corruption efforts in Iraq. This thoughtful integration of previous experiences enhances the project's potential for effectiveness and sustainable impact, positioning it to avoid known pitfalls and capitalize on proven strategies.

To what extent the project logic, concept and approach is appropriated and relevant to achieving the project targets and objectives?

Project Logic Coherence

The project demonstrates strong logical coherence, with a clear theory of change linking problem analysis to outputs and outcomes, and alignment with broader country program goals.

Evidence:

- The ProDoc outlines a clear theory of change (TOC) in Section II that shows the logical flow from the problem analysis to the outputs, outcomes and overall impact. The TOC narrative demonstrates coherence in how the various elements are expected to contribute to the project objectives.
- The Results Framework in Annex I presents a logical hierarchy of indicators from the outputs up to the UNSDCF and CPD outcomes, showing alignment and coherence within the larger country program.
- The detailed output-level problem analysis and rationale in the ProDoc demonstrates vertical logic and coherence in how the proposed activities are designed to address the identified issues.

Concept Alignment with Objectives

The project concept shows strong alignment with anti-corruption objectives, with a majority of outputs directly addressing corruption issues and even non-corruption outputs supporting broader economic growth goals.

Evidence:
- The project concept focuses on strengthening legislative frameworks, institutional capacities, and skills to address corruption, which directly aligns with the anti-corruption objective.
- Outputs 1, 2, 4 and 5 all focus on anti-corruption, demonstrating strong conceptual alignment with this objective.
- Output 3 on commercial dispute resolution is framed as supporting the broader objective of promoting economic growth by improving the investment climate. This shows alignment of even the non-corruption output to the project's larger goals.

Approach Suitability

The multi-stakeholder, capacity-building approach adopted by the project is suitable for addressing corruption from multiple angles and sustainably strengthening anti-corruption systems.

Evidence:
- The project takes a multi-pronged approach of working with government, civil society, media and international partners. This multi-stakeholder approach is suitable for addressing corruption from different angles.
- The emphasis on capacity building of key actors like judges, investigators and parliamentarians is an appropriate approach to sustainably strengthen the system's ability to combat corruption.
- Integrating anti-corruption measures into other governance projects like public finance management demonstrates a suitable cross-cutting approach.

Design Weaknesses:

The project's holistic design, encompassing anti-corruption and commercial dispute resolution, is conceptually relevant for achieving its objectives in Iraq's complex governance landscape. However, the design also presents some weaknesses that could limit the efficiency and effectiveness with which project targets are met.

1. Involving numerous stakeholders and beneficiaries

Design weakness:
- The project engages with a wide range of stakeholders across various institutions and levels of government, including federal and regional Commissions of Integrity (CoI), government, parliament, justice sector, civil society, media, and citizens.

- Managing the varying interests, priorities, and capacities of such a large number of actors spread across federal and regional levels may prove challenging.

Examples from the Project Document:
- The Council of Ministers at the federal level might fail to formally approve the national anti-corruption strategy before the June 2021 elections, limiting the document's authority.
- The Kurdistan Region Government (KRG) Council of Ministers is eager to take a more robust role in anticorruption, but clarifications are needed around the roles of regional CoI and the new anti-corruption office.
- Parliamentarians may block bills that are not in favor of their political parties, irrespective of where the bill originated.

Impact on project effectiveness and efficiency:
- Aligning federal and regional strategies and getting consistent buy-in from all relevant institutions could be difficult.
- Navigating political interests across the large number of stakeholders involved will likely pose coordination challenges that could hamper the project's ability to deliver on its objectives within the planned timeline and budget.

2. Combining anti-corruption and arbitration in a single project

Design weakness:
- The project aims to tackle both corruption and commercial dispute resolution, which require distinct approaches, stakeholders, and technical expertise.

Examples from the Project Document:
- The anti-corruption component involves outputs related to improving legislative frameworks, enhancing investigation and adjudication capacities, promoting integrity in the justice sector, and increasing transparency and accountability.
- The commercial dispute resolution component focuses on reforming arbitration and mediation laws, modernizing courts and enforcement departments, building a culture of alternative dispute resolution, and raising awareness.
- Building inclusive alternative dispute resolution practices requires putting together major building blocks targeting arbitrators, proceedings, and arbitration institutions.

Impact on project effectiveness and efficiency:
- Managing the technical and stakeholder coordination requirements of what are essentially two sub-projects could strain the project's efficiency.
- Housing two distinct technical components in one project could impede focused and efficient delivery.
- Separating the two aspects into more focused projects may have allowed for more tailored designs and efficient implementation.

Analysis

The project demonstrates strong logical coherence and conceptual alignment with its anti-corruption objectives. The theory of change clearly links the problem analysis to the outputs, outcomes, and overall impact, showing coherence in how the various elements are expected to contribute to the project objectives. The Results Framework also presents a logical hierarchy of indicators, aligning the outputs with the UNSDCF and CPD outcomes and demonstrating coherence within the larger country program.

The project concept focuses heavily on strengthening anti-corruption frameworks, capacities, and skills, directly aligning with the anti-corruption objective. The majority of outputs (1, 2, 4, and 5) specifically target anti-corruption, while even the non-corruption

output (3) on commercial dispute resolution is framed as supporting the broader goal of promoting economic growth by improving the investment climate.

The multi-stakeholder, capacity-building approach adopted by the project is suitable for addressing corruption from multiple angles and sustainably strengthening anti-corruption systems. Working with government, civil society, media, and international partners allows for a multi-pronged approach, while emphasizing capacity building of key actors like judges, investigators, and parliamentarians is appropriate for sustainably strengthening the system's ability to combat corruption.

However, the project's holistic design, encompassing both anti-corruption and commercial dispute resolution, presents some weaknesses that could limit efficiency and effectiveness in achieving project targets. Furthermore, combining anti-corruption and commercial dispute resolution in a single project requires distinct approaches, stakeholders, and technical expertise. Managing the technical and stakeholder coordination requirements of what are essentially two sub-projects could strain the project's efficiency.

Are the project's outputs clearly articulated, feasible, realistic?

Clarity of Articulation

The project outputs are well-defined and clearly articulated, with detailed problem analysis, context, and measurable indicators provided for each output.

Evidence:
- The Project Document (ProDoc) in Section II "Project Strategy" clearly outlines the five key outputs: 1) Improved legislative and strategic framework for anti-corruption, 2) The justice sector, lawyers and CoI better equipped to process corruption offenses, 3) Enhanced legislations, institutions and capacities for commercial dispute resolution, 4) Create a climate of support in Parliament for anti-corruption reforms, and 5) Increased transparency and public accountability.
- For each output, the ProDoc provides a detailed problem analysis, context, and reasoning for the proposed activities under the output. This demonstrates a clear articulation and rationale for the outputs.
- The Results Framework in Annex I of the ProDoc further defines specific, measurable indicators, baselines and targets for each output, allowing progress to be tracked. This adds to the clarity in how the outputs are defined and will be measured.

Feasibility

The project's implementation strategy, including partnerships, phased workplans, and allocated resources, supports the feasibility of achieving the outlined outputs.

Evidence:
- The ProDoc outlines partnerships with Iraqi government entities, civil society, and international partners to implement project activities, rather than UNDP acting alone. This makes the outputs more feasible by sharing responsibilities.
- A 48-month, phased workplan is provided for each output and activity, demonstrating a feasible timeline for implementation.
- An indicative output-based budget is provided, demonstrating sufficient financial resources allocated to implement the activities under each output.

Realism

While acknowledging the ambitious nature of its goals, the project demonstrates realism by recognizing potential obstacles, leveraging existing efforts, and proposing mitigation measures for identified risks.

Evidence:
- The ProDoc acknowledges assumptions and risks that could impact the realism of achieving the outputs, such as political instability, security issues, and lack of political will. Mitigation measures are proposed. This shows realism about the operating environment.
- The project is building on previous anti-corruption work by UNDP and integrating with other ongoing projects. This makes the outputs more realistic by leveraging existing efforts rather than starting from zero.
- At the same time, the ProDoc notes the ambitious nature of the reforms envisioned and the need for highest-level Iraqi commitment, demonstrating realism about the magnitude of the challenge in achieving systemic change.

Analysis

The outputs are clearly articulated in the Project Document, with each of the five key areas well-defined and supported by detailed problem analysis and context. The inclusion of specific, measurable indicators, baselines, and targets in the Results Framework further enhances the clarity of what each output aims to achieve and how progress will be measured.

Feasibility is supported by the project's implementation strategy. The approach of partnering with Iraqi government entities, civil society, and international partners distributes responsibilities and leverages collective expertise, enhancing the likelihood of successful implementation. Equally, the project demonstrates realism by acknowledging the ambitious nature of its goals while recognizing potential obstacles in the operating environment. The identification of risks such as political instability and security issues, along with proposed mitigation measures, shows a pragmatic approach to implementation. Building on previous anti-corruption work and integrating with ongoing projects also enhances the realism of the outputs by leveraging existing efforts and relationships.

How were the UN programming principles mainstreamed in the design, implementation and monitoring and evaluation of the project?

UN Programming Principle: Leaving No One Behind (LNOB)

Emphasized through gender equality and civil society engagement.

Project Design:
- The project document states that the project will integrate gender equality and civil society engagement as cross-cutting elements. (Project Document, Project Strategy section)
- The project aims to promote understanding of corruption work and integrity and transparency in parliament, ensuring no group is left behind. (Project Document, Project Strategy section)

Implementation:
- The project is ensuring women's participation in project activities, with female participation ranging from 25-30% in the first year. The project strives for increased women's participation through enhanced outreach and communication. (ACAI Narrative Report Apr 2021-Apr 2022, Executive Summary)
- The project facilitated a roundtable with the Iraqi Women Judges Association on the role of women judges in anti-corruption cases, emphasizing the need for a gender perspective. (ACAI Narrative Report Jan-Oct 2023, Output 2 section)
- The project aims for a minimum of 20% women's participation in its commercial dispute resolution training programs to ensure equal access. (Project Document, Output 3 section)

Monitoring:
- Project indicators in the results framework are disaggregated by gender where relevant to monitor women's participation and gender equality. (Project Document, Results Framework)

UN Programming Principle: Human Rights

Integrated into project design and implementation, particularly in trial monitoring.

Project Design:	- The project document states human rights principles will be integrated as a cross-cutting element in project design. (Project Document, Project Strategy section)
Implementation:	- The trial monitoring program, implemented with UNAMI's human rights office, aims to promote rule of law, justice and human rights by supporting the judiciary. (ACAI Narrative Report Apr 2021-Apr 2022, Output 2 section)
	- Trainings for civil society and media emphasize adhering to international standards in corruption reporting, including protecting human rights. (ACAI Narrative Report Jan-Oct 2023, Output 5 section)
Monitoring:	- The project's trial monitoring program, conducted with UNAMI human rights office, allows monitoring of human rights standards in corruption cases. (Project Document, Output 2 section)

UN Programming Principle: Gender Equality and Women's Empowerment

Objective with targeted efforts to increase women's participation.

Project Design:	- The project document states that gender equality will be integrated as a cross-cutting element in project design. (Project Document, Project Strategy section)
	- The project has a gender marker of 2, indicating gender equality is a significant objective. (Project Document, Cover Page)
Implementation:	- The project is ensuring women's participation in project activities, with female participation ranging from 25-30% in the first year. The project strives for increased women's participation through enhanced outreach and communication. (ACAI Narrative Report April 2021-April 2022, Executive Summary)
	- The project facilitated a roundtable with the Iraqi Women Judges Association on the role of women judges in anti-corruption cases, emphasizing the need for a gender perspective. (ACAI Narrative Report Jan-Oct 2023, Output 2 section)
	- The project aims for a minimum of 20% women's participation in its commercial dispute resolution training programs to ensure equal access and empower women economically and professionally. (Project Document, Output 3 section)
Monitoring:	- Project indicators in the results framework are disaggregated by gender where relevant to monitor women's participation and gender equality. (Project Document, Results Framework)

UN Programming Principle: Sustainability and Resilience

Focused on capacity development and durable institutional changes.

Project Design:	- The project approach aims to produce sustainable outcomes through capacity development, legislative and policy reforms, and creating durable links between stakeholders. (Project Document, Sustainability section)
	- Skills learned by target groups will be transferable to enable replication and wider impact within Iraq. (Project Document, Sustainability section)

Implementation:	-	Trainings are designed with a Training of Trainers (TOT) approach to develop sustainable internal resources for continued capacity building. (ACAI Narrative Report Apr 2022-Dec 2022, Output 3 section)
	-	The project is working with Judicial Training Institutes to integrate integrity training into their curricula for long-term sustainability. (Project Document, Output 2 section)
Monitoring:	-	Sustainability elements are outlined for each output in the project document to guide monitoring. (Project Document, Sustainability section)

UN Programming Principle: Accountability

Ensured through governance structures and monitoring mechanisms.

Project Design:	-	The project is governed by a multi-stakeholder Project Steering Committee to provide oversight and ensure accountability. (Project Document, Governance and Management Arrangements section)
	-	UNDP's Social and Environmental Standards and Accountability Mechanism will be applied. (Project Document, Risk Management section)
Implementation:	-	The project steering committee meets annually to review progress, provide strategic guidance and ensure accountability. The first PSC meeting was held in January 2023. (ACAI Narrative Report Jan-Oct 2023, Project Oversight and Quality Assurance section)
	-	The project is enabling civil society and media to conduct responsible reporting on corruption cases to enhance public accountability. (Project Document, Output 5)
Monitoring:	-	The project has a monitoring plan outlining accountability mechanism such as regular progress reporting to steering committee and compliance with UNDP and EU monitoring requirements. (Project Document, Monitoring and Evaluation section)

Analysis

Leaving No One Behind, and Gender Equality and Women Empowerment are emphasized through targeted efforts to increase women's participation in project activities, with gender-disaggregated monitoring indicators tracking progress.

Human Rights principles are integrated notably in the trial monitoring program, implemented in collaboration with UNAMI's human rights office, promoting rule of law and justice. This approach extends to training civil society and media on international standards in corruption reporting.

Sustainability and Resilience are prioritized through capacity development initiatives and durable institutional changes. The project employs a Training of Trainers approach and works with Judicial Training Institutes to embed integrity training in curricula, ensuring long-term impact.

Accountability is ensured through governance structures, including a multi-stakeholder Project Steering Committee and adherence to UNDP's Social and Environmental Standards. The project also empowers civil society to enhance public accountability through responsible corruption reporting.

To what extent is the Project well-designed and has well-planned exit strategy?

Strengths in Design for Sustainability

The project demonstrates a well-designed approach for sustainability through its strategy and output-level considerations.

Evidence:
- The project approach aims to produce sustainable outcomes through empowerment, development of Iraqi capacity, legislative and policy reforms, and creation of links between stakeholders in anti-corruption institutions, justice sector, civil society and the public to strengthen accountability and anti-corruption reforms. (Project Document, Section II.V. Sustainability)
- Outputs 1 and 3 focus on legislation and strategies that are owned by the Iraqi government and do not bear long-term cost. Implementation costs will become part of federal or regional budgets through the processes for adoption of legislation and policy. (Project Document, Section II.V. Sustainability)
- Output 2 aims to build individual and institutional capacities that will be sustained beyond the ACAI timelines. Skills acquired by individuals will be transferred within the community of investigators and judges. Together these outcomes will result in institutions trusted by citizens. (Project Document, Section II.V. Sustainability)
- Output 4 will result in better capacity and awareness in Parliament that lasts for the mandate period of upcoming Parliamentarians. The practice of engaging Parliament by civil society and public institutions will last longer. The financial cost for maintaining forums is limited. (Project Document, Section II.V. Sustainability)
- Output 5 will set an organizational culture of communication with citizens, civil society and media that will become an integral part of the functioning of public institutions. Public institutions will bear the main ongoing costs in their budgets. (Project Document, Section II.V. Sustainability)
- Interviewees mentioned that the project aimed to address corruption at both macro and micro levels through a comprehensive approach. The project team reportedly worked on implementing the government's anti-corruption strategy in coordination with the government.
- Some respondents noted that the project is working on the legislative and strategic framework which is key to work on government structures and promote long-term reforms on anti-corruption and commercial arbitration. The capacity building of professionals is also reportedly important for sustainability.

Weaknesses in Design for Sustainability

While the project demonstrates strengths in its sustainability design, there are areas for improvement, including the need for an exit strategy, clearer mechanisms for institutionalizing capacity, and greater emphasis on utilizing local expertise.

Evidence:
- No specific exit strategy is outlined in the project document. The focus is on the elements built into the design that are intended to enable sustainability, but there is no clear plan for exit and handover. (Project Document, Section II.V. Sustainability)
- Assumptions are made about government commitment and budgets to sustain outcomes, but risks and mitigation measures related to this are not elaborated. (Project Document, Section II.V. Sustainability)
- Capacity building efforts are emphasized for sustainability, but mechanisms to institutionalize the capacity, such as integration into organizational plans and budgets, are not specified. (Project Document, Section II.V. Sustainability)

- Interviewees mentioned that an exit strategy was not clearly defined from the beginning. At the project's midterm, the team is reportedly still working with UNDP on developing the exit strategy, including plans to transfer curricula to local judicial and anti-corruption training institutes. This was reportedly a key recommendation from a recent monitoring mission.
- Some respondents noted that some activities relied on international rather than local expertise. Involving more Iraqis would reportedly help continue the work after international contracts end. There reportedly seems to be a lack of connection between the international efforts and the local community.

Analysis

ACAI demonstrates a thoughtful approach to sustainability in its design, incorporating several elements aimed at ensuring long-term impact. The focus on empowering Iraqi institutions, developing local capacity, and implementing legislative and policy reforms shows a clear intention to create lasting change. Each output has been designed with sustainability considerations, from embedding costs in government budgets to building transferable skills and fostering a culture of accountability.

However, the project's design for sustainability is not without limitations. Most notably, there is a lack of an exit strategy in the project document. This omission could potentially hinder smooth transition and handover of activities to local stakeholders.

The project's reliance on international expertise, rather than local capacity, is another area that may need attention. Greater involvement of Iraqi experts could have enhanced the project's sustainability by ensuring continuity of efforts after the departure of international consultants.

Furthermore, while it assumes government commitment and budget allocation for sustaining outcomes, it does not sufficiently address the risks associated with these assumptions or outline clear mitigation measures. The mechanisms for institutionalizing the capacity built through it are also not clearly specified, which could impact the long-term retention of skills and knowledge within target institutions.

6.2. Coherence

6.2.1. To what extent did the project complement work among different entities, including development partners and civil society? To what extent has project been able to form and maintain partnerships with other development actors including bilateral and multilateral organizations, civil society organizations, academia and the private sector to leverage results?

Coordination with Development Partners

Strong evidence of systematic coordination and collaboration with multiple international partners

Evidence:
- ACAI convened a bi-monthly Anti-Corruption Coordination Forum (ACCF) to harmonize anti-corruption efforts among international partners. 5 ACCF meetings were held in the first year and 2 more in the second year, with participants including EU, EUAM, NMI, US Embassy/INL, USAID/DAI, UK Embassy, UNDP, UNODC, UNAMI OHCHR, GIZ, Transparency International, and the World Bank. (1st Annual Progress Report, Output 1.6; 2nd Annual Progress Report, Output 1.6)
- UNDP collaborated with the EU-funded GIZ project "Private Sector Development and Employment Promotion" and the EU-funded World Bank project on 'Public Finance Management (PFM)' to ensure coordination and coherence. (Project Document, section II.III Synergies with related initiatives)
- Some respondents highlighted UNDP's collaboration with various UN agencies, such as UNAMI Human Rights Office, UNODC, and UNICRE, on anti-corruption efforts, demonstrating a coordinated approach among development partners.
- Interviewees noted the project's engagement with international organizations like Transparency International, further underscoring its commitment to fostering partnerships and coordination with development partners.

Engagement with Civil Society

Clear demonstration of active engagement and support for civil society organizations

Evidence:
- The project trained 26 civil society activists and journalists from across Iraq on investigative journalism and CSO investigative reporting in the first year. (1st Annual Progress Report, Output 5.3)
- A second cohort of around 30 civil society and journalists advanced their corruption reporting skills through two workshops in the second year. (2nd Annual Progress Report, Output 5.3)
- The project aimed to create an anti-corruption forum with civil society participation to discuss corruption, although this was not established in the first two years. (Results Framework, Output 4)
- Feedback from project beneficiaries provided evidence of direct involvement in training and capacity building for civil society organizations, journalists, and activists, indicating a strong commitment to engaging and supporting these stakeholders.
- Some interviewees mentioned the formation of an anti-corruption network, which includes representatives from civil society organizations and training participants, demonstrating the project's efforts to foster collaboration and sustainability among civil society actors.

Partnerships with Academic Institutions

The project has initiated collaborations with academic institutions to integrate anti-corruption and dispute resolution topics into higher education, though further expansion of these partnerships is needed.

Evidence:
- In September 2022 (2nd year), ACAI signed an MoU with the American University in Baghdad (AUIB)[28] covering several priority anti-corruption areas including joint curriculum development. (2nd Annual Progress Report, Output 3.3)
- The project planned to formalize similar cooperation with the American University of Sulaymaniyah and several leading Iraqi public universities. (2nd Annual Progress Report, Output 3.3)
- Certain respondents mentioned the need for collaborating with the Ministry of Higher Education to incorporate anti-corruption and commercial dispute resolution into university curricula.

Analysis

The ACAI project has demonstrated a sound approach to complementing work among different entities, effectively engaging with development partners, civil society organizations, government institutions, and academic bodies.

The project's coordination with development partners is particularly strong, evidenced by the establishment of the bi-monthly Anti-Corruption Coordination Forum (ACCF). This forum has brought together a diverse range of international partners, fostering harmonization of anti-corruption efforts. The project's collaboration with other EU-funded initiatives and UN agencies further underscores its commitment to a coordinated approach.

Engagement with civil society has been active and substantive, focusing on capacity building for activists and journalists in investigative reporting on corruption. The formation of an anti-corruption network including civil society representatives demonstrates the project's effort to create sustainable partnerships in this sector.

ACAI's collaboration with government institutions is comprehensive, involving key bodies such as the Commissions of Integrity, Supreme Judicial Councils, and Parliaments at both federal and KRI levels. This engagement spans legislative reviews, capacity building, and strategy implementation, indicating a deep level of cooperation with official entities.

The project has also initiated partnerships with academic institutions, notably through an MoU with the American University in Baghdad, with plans to expand to other universities. This demonstrates a forward-thinking approach to institutionalizing anti-corruption efforts in educational curricula.

6.2.2. To what extent has project increased synergies with other projects in UNDP and other agencies?

Synergies with UNDP Projects

Evidence of active collaboration and integration with multiple UNDP initiatives

Evidence:
- The project leveraged partnerships with other ongoing UNDP projects such as the Anti-Corruption in the Arab Countries (ACIAC) Programme, the Anti-Corruption for Trust (ACT) in Iraq, the UNDP Iraq Security Sector Reform (SSR) and Rule of Law programme, UNDP Global Rule of Law Programme, and the Iraq Crisis Response and Resilience Programme. (1st Annual Progress Report, section II. Management Effectiveness Review)

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[28] United Nations Development Programme (UNDP), "A promising partnership: UNDP and AUIB join hands for Iraq's future," September 13, 2023, https://www.undp.org/iraq/press-releases/promising-partnership-undp-and-auib-join-hands-iraqs-future

- Cooperation with ACIAC focused on corruption risk assessment, anti-corruption strategies, legislative review and capacity building of CoIs. Work with ACT project mostly focused on civil society empowerment. (1st Annual Progress Report, section II. Management Effectiveness Review)
- The project came under the Governance Pillar of UNDP Iraq's Programme Portfolio, helping cost-effectiveness by leveraging operational support and processes already in place within UNDP Iraq. (Project Document, section VII. Project Management)
- Project team members indicated that the ACAI project has been working closely with other UNDP projects, such as the Security Sector Reform project, to address anti-money laundering efforts and find synergies in capacity building for investigators.
- Interviewees noted that the project has been collaborating with UNDP's climate change and digital transformation projects to ensure that anti-corruption measures are mainstreamed across various initiatives.

Synergies with Other Agencies

Strong evidence of coordination and collaboration with various international agencies

Evidence:
- UNDP worked closely with UNAMI, which brought ample experience in monitoring justice issues. The project's trial monitoring program was implemented in close cooperation with UNAMI's human rights section. (Project Document, section II.V UN Partnerships)
- UNDP drew upon UNODC's expertise where required, especially for international cooperation (including extradition), asset recovery, legislative work and support in trainings. UNDP referred to UNODC headquarter-based experts to ensure coordination on UNCAC review and the StAR initiative. (Project Document, section II.V UN Partnerships)
- Specific collaboration included working with UNODC to synergize support on asset recovery after Iraq requested UNODC assistance under its StAR initiative in 2020. (Project Document, section II.III Synergies with related initiatives)
- Some respondents particularly highlighted the project's strong collaboration with UNAMI Human Rights Office in the context of trial monitoring, which has reportedly helped to strengthen the relationship between UNDP and UNAMI and provide a more holistic approach to addressing human rights and corruption issues.

Analysis

Within UNDP, ACAI has actively collaborated with multiple initiatives, including the Anti-Corruption in the Arab Countries Programme, Anti-Corruption for Trust in Iraq, and the Security Sector Reform and Rule of Law programme. These partnerships have facilitated knowledge sharing and resource optimization across different areas of anti-corruption work, from corruption risk assessment to civil society empowerment. The project's integration into UNDP Iraq's Governance Pillar has further enhanced cost-effectiveness by utilizing existing operational support and processes.

Externally, ACAI has established strong synergies with other UN agencies and international organizations. The collaboration with UNAMI on trial monitoring and with UNODC on asset recovery and UNCAC review demonstrates a coordinated approach to leveraging specialized expertise. This inter-agency cooperation has not only enhanced the project's technical capacity but also contributed to a more comprehensive and coherent anti-corruption strategy in Iraq.

The project's efforts to mainstream anti-corruption measures across various sectors, including climate change and digital transformation, highlight its commitment to a holistic approach. This cross-cutting strategy ensures that anti-corruption principles are integrated into diverse development initiatives, potentially amplifying the overall impact.

6.2.3. How have changes in the external environment affected the project's theory of change?

External Environmental Shifts

Political volatility and regional instability have presented obstacles to the project's implementation, necessitating adaptive strategies and flexible approaches.

Evidence:
- The political situation in Iraq remained volatile during the project period. The period from April 2022 to December 2022 was marked by a widespread political crisis, with protests and storming of the parliament building. A new government was finally formed in October 2022 after a year of political deadlock. (ACAI Narrative Report 30th of April 2022 - 31st of December 2022, Situation Update)
- In May 2023, the Iraqi Federal Supreme Court ruled that the extension of the term of the Kurdistan Region Parliament in 2022 was unconstitutional. This decision complicated the political scene in the Kurdish region. (ACAI Narrative Report January 2023 - 8th October 2023, Situation Update)
- Several interviewees viewed the political situation in the country as the main obstacle to the project and other efforts, with the government focusing more on security and economic issues rather than anti-corruption.

Impact on Project Assumptions

Key project assumptions, particularly those related to political stability and pandemic conditions, have been tested by evolving circumstances, requiring ongoing reassessment and adjustment.

Evidence:
- The project document notes that a key assumption is "sufficient levels of security and political stability prevail that allow implementation of project activities". The political instability and protests in 2022 probably challenged this assumption to some degree. (Project Document, Assumptions and Risks)
- Another assumption was the "existing and potential health pandemics stabilize allowing timely project implementation". While not explicitly mentioned, the COVID-19 pandemic probably continued to have some impact in the early stages. (Project Document, Assumptions and Risks)
- Key informants noted that the project document was developed based on the assumption of commitment from both the federal government and the Kurdistan Regional Government to address anti-corruption together.

Adaptability of the Theory of Change

The project has demonstrated resilience by adjusting its approach and activities in response to political changes and regional developments, while maintaining focus on core objectives.

Evidence:
- Despite the political challenges, the project was able to adapt and continue implementation. For example, after the delays in government formation in 2022, once the new government took office, the project re-engaged on priorities like the Access to Information law which was then approved by the Council of Ministers in October 2023. (ACAI Narrative Report January 2023 - 8th October 2023, Activity 1.1)
- The project adjusted some activities due to the political situation in the Kurdistan Region after the court ruling. Planned activities with the Kurdistan

Parliament were put on hold until the situation normalizes. (ACAI Narrative Report January 2023 - 8th October 2023, Challenges and Lessons Learnt)
- Some respondents reported that the project adapted its approach by emphasizing the need for both the federal and Kurdistan Regional governments to be in the same room during the launch, recognizing the importance of a unified anti-corruption effort across Iraq. This was seen as demonstrating the project's ability to adjust its theory of change to ensure buy-in and commitment from key stakeholders.

Analysis

The ACAI project's theory of change has demonstrated resilience and adaptability in the face of Iraq's volatile political landscape. External shifts, including prolonged government formation processes, regional constitutional challenges, and changing national priorities, have tested the project's core assumptions about political stability and commitment to anti-corruption efforts.

Despite these obstacles, the project has shown remarkable agility. It has re-engaged with new government formations, as evidenced by the approval of key legislation and renewed partnerships. The project's ability to adjust activities in response to regional political complications while maintaining a focus on unified anti-corruption efforts across federal and regional levels demonstrates a strong understanding of the political dynamics.

Furthermore, the project has expanded its approach to incorporate emerging factors and stakeholders. The integration of anti-corruption efforts with climate change and women's issues initiatives, as well as the engagement with new beneficiaries like investigators, indicates an evolving, more holistic approach to governance.

6.2.4. To what extent do other interventions or policies support or undermine the project

Supporting Factors

Supportive Interventions and Policies

National strategies and international commitments provide a favorable framework, enhancing project relevance and facilitating implementation

Evidence:
- The draft National Anti-Corruption Strategy (2019-2022) and the Kurdistan Regional Government's (KRG) Anti-Corruption Strategy (2021-2025) provided entry points for project activities, even if not formally adopted. (Project Document, section I.II Operational Context)
- Iraq's accession to UNCAC in 2008 and ongoing UNCAC review cycles generated recommendations that guided project focus areas. (Project Document, section I.II Operational Context)
- Interviewees highlighted that the project's efforts to support the development and adoption of anti-corruption strategies at both federal and KRI levels align with the government's stated priorities and commitments, creating a supportive policy environment for project implementation.
- Some respondents noted that Iraq's accession to international treaties on anti-corruption and commercial dispute resolution further reinforces the project's relevance and provides a favorable framework for its interventions.

Undermining Factors

Political Challenges Impeding Anti-Corruption Progress

Political instability, resistance to change, and shifting government priorities pose ongoing obstacles to the project's implementation and long-term sustainability of anti-corruption efforts.

Evidence:
- The suspension of the KRI Parliament by the Supreme Court in 2022[29] delayed some project activities with the regional parliament. (2nd Annual Progress Report, Challenges and Lessons Learnt)
- Demands for anti-corruption support often went beyond the project's scope, requiring coordination with other partners. (2nd Annual Progress Report, Challenges and Lessons Learnt)
- Certain interviewees suggested that political instability and changes in government priorities could potentially undermine the project's progress and sustainability, as anti-corruption efforts may not remain a top priority for future administrations.
- Some respondents implied that resistance to reform within government institutions could hinder the project's ability to achieve its objectives, particularly in terms of implementing legislative changes and promoting institutional capacity building.

Analysis

Supporting factors bolster the project's relevance and potential for success. National anti-corruption strategies and Iraq's international commitments, particularly to UNCAC, provide a favorable policy framework that aligns with and legitimizes the project's objectives. This alignment enhances the project's relevance and facilitates implementation by creating entry points for activities and guiding focus areas.

Collaborative efforts with other projects and international agencies have created valuable synergies, optimizing resources and expanding the project's reach. The Anti-Corruption Coordination Forum exemplifies how international coordination strengthens the project's effectiveness through knowledge sharing and aligned efforts. Moreover, supportive legal and policy reforms, such as the passage of the Access to Information law, reinforce the project's objectives by creating a stronger anti-corruption framework.

However, the project also faces obstacles that potentially undermine its effectiveness. Political instability, as evidenced by the suspension of the KRI Parliament, can delay activities and disrupt implementation. Resistance to reform within government institutions poses an obstacle to achieving sustainable change. Furthermore, shifting political priorities may jeopardize the long-term sustainability of anti-corruption efforts.

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[29] Timour Azhari and Ahmed Rasheed, "Iraqi Kurdistan parliament's 2022 term extension unconstitutional, supreme court rules," Reuters, May 30, 2023, https://www.reuters.com/world/middle-east/iraqi-kurdistan-parliaments-2022-term-extension-unconstitutional-supreme-court-2023-05-30/

6.3. Efficiency

6.3.1. To what extent have the project implementation strategy and execution been efficient and cost-effective?

Efficiency of the Project Implementation

The project has leveraged existing UNDP structures and partnerships to streamline operations, while strategically investing in high-quality expertise to achieve project outputs effectively.

Evidence:
- The project leveraged operational support and processes already in place within UNDP Iraq and partnerships with other ongoing UNDP projects to improve cost effectiveness. (Project Document, Cost Efficiency and Effectiveness section)
- Consolidated operations and administration support teams working across the UNDP portfolio helped consistency in processes, saved time and resources. (Project Document, Project Management section)
- Where there was a shortage of national level expertise, the project relied on high quality international technical expertise, seen as a strategic investment fundamental to achieving project outputs. (Project Document, Cost Efficiency and Effectiveness section)
- The project aimed to ensure sustainability by working with existing government structures so that actions started in the project can be continued by government partners. For example, train the trainer activities with CoI's Anti-Corruption Academy, the Judicial Training Institute and the Bar Association enable partners to continue activities after project end. (Project Document, Sustainability section)
- Some interviewees noted that the procurement process was efficient, with activities agreed between the project manager and counterparts, detailed TORs prepared, and a competitive bidding process among pre-selected service providers. Payments were reportedly processed smoothly after services were completed and supporting documentation checked.
- Several respondents from the judiciary stated the project's cooperation with the trial monitoring team was very fruitful. The project team reportedly ensured not to disturb trial processes by discussing matters after hearings.

Analysis

The ACAI project has demonstrated a strong commitment to efficiency and cost-effectiveness in its implementation strategy and execution. Key efficiency measures include leveraging existing UNDP Iraq operational support, partnering with ongoing projects, utilizing consolidated support teams, and strategically employing international expertise where needed. The project has also focused on working within existing government structures to ensure sustainability.

Cost-effectiveness has been achieved through competitive procurement processes, use of pre-vetted expert rosters, strategic planning for consolidated procurement actions, and a focus on sustainable outcomes such as skills development and institutional capacity building.

While some obstacles were encountered, such as procurement delays due to a new oversight system, these issues have been largely resolved. The project has received praise for its flexible support and services provision.

6.3.2. To what extent were adequate resources (financial and human) secured prior to project implementation? Were the requested financial tranches received on time?

Human Resource Allocation

Adequate staffing achieved, with leveraging of existing UNDP resources

Evidence:
- The project team includes staff carrying out technical assistance, administration and management. It comprises full-time dedicated and part-time specialized project staff, apportioned based on actual support required. (Project Document, Project Management section)
- The Project Management Unit (PMU) consists of a Project Manager, Project Management Specialist, M&E and Reporting Specialist, and Project Associate, all UNDP staff dedicating 100% of their time to the project. (Project Document, Project Management section)
- The Technical Assistance Team (TAT) consists of full-time staff (international and national personnel) leading on technical expertise in areas such as anti-corruption, legislation, investigation, mentoring, integrity, commercial dispute resolution, and communication. (Project Document, Project Management section)
- The project is further supported part-time by key staff positions in the UNDP Country Office, including Human Resources, Procurement, Finance, and IT staff. (Project Document, Project Management section)
- Most of ACAI positions were filled in the first year, with recruitment underway for the remaining positions expected to be filled in the first half of the second year. (Progress Report April 2021-April 2022, Management Effectiveness Review section)
- Informants mentioned that existing UNDP resources were leveraged where possible. For example, when the communication strategy was delayed due to lack of an expert, the project reportedly relied on UNDP's internal expertise to cover that aspect in the interim.

Financial Resource Allocation

Financial resource management has been efficient, with timely fund disbursement and careful budgeting supporting smooth project operations.

Evidence:
- The project has allocated resources to the corresponding outputs as per the agreement with the EU. The project is currently on track with its objectives and is efficiently utilizing the resources allocated. (Progress Report April 2021-April 2022, Management Effectiveness Review section)
- Key informants reported that there were no delays from the donor in releasing payments. As per the EU agreement, once 70% of a tranche is utilized and reported, the next tranche is released within 3 months. Having a cushion of 30% from the previous tranche reportedly helps avoid cash flow issues.
- Respondents noted that the project budget was prepared considering all aspects, which has helped smooth implementation. A contract amendment was also reportedly done to incorporate changes realized during the inception period. Careful budgeting has reportedly supported the project in running smoothly from a financial perspective.

Analysis

Human resources were adequately secured, with a well-structured staffing plan including a dedicated Project Management Unit and Technical Assistance Team. The project leveraged existing UNDP resources, filling most positions in the first year and utilizing internal expertise to cover gaps. This approach ensured a balance of dedicated project staff and part-time specialized support from the UNDP Country Office.

Financial resources were carefully allocated and managed. The project budget was prepared, considering all aspects of implementation and incorporating changes identified during the inception period. This careful planning has contributed to smooth financial operations throughout the project's lifecycle.

Importantly, there were no delays in receiving financial tranches from the donor. The EU agreement's structure, which allows for the next tranche to be released when 70% of the previous one is utilized and reported, has provided a financial cushion and helped avoid cash flow issues. This timely receipt of funds has supported consistent project implementation.

6.3.3. Is there any appropriate mechanism for monitoring the progress of the project? If yes, is there adequate usage of results/data for programming and decision making?

Existence of Monitoring Mechanisms

The project has implemented a monitoring system with multiple components

Evidence:
- The project follows UNDP's policies and procedures for monitoring. Throughout the project, UNDP monitoring and evaluation (M&E) remains actively involved in process and progress monitoring and tracking the progress and quality of the implementation process. Tools have been developed for progress monitoring against project targets. (Project Document, Monitoring and Evaluation section)
- The project has a multi-stakeholder Project Steering Committee that serves as the highest-level project management and oversight body. It reviews progress against target results, supports the identification of solutions to obstacles faced by the project, and reviews risks and lessons learned. (Project Document, Governance and Management Arrangements section)
- UNDP conducts project review meetings at least annually to assess performance and ensure realistic budgeting over the project life. (Project Document, Monitoring Plan)
- The project also undergoes an Annual Project Quality Assurance review against UNDP quality standards. (Project Document, Monitoring Plan)
- Quarterly and annual progress reports are prepared, and a final report will be prepared at the end of the project. (Project Document, Monitoring Plan)
- Interviewees mentioned that an online library stores all project documents by output and activity. Indicator tracking and activity progress is reportedly updated quarterly.
- Some respondents noted that risks are regularly updated and reported to management. EU reporting reportedly includes quarterly updates on progress against the results framework.

Analysis

The ACAI project has implemented a monitoring mechanism that effectively tracks progress and informs decision-making. This system includes regular progress tracking, a multi-stakeholder Project Steering Committee, annual reviews, quality assurance processes, and detailed reporting.

The project actively uses monitoring data for adaptive management and decision-making. This is evidenced by timely signaling of slow progress to stakeholders, active risk management, application of lessons learned, and course corrections based on performance data. The monitoring system's effectiveness is further enhanced by its integration with UNDP's corporate quality assurance processes and its alignment with donor reporting requirements.

6.3.4. To what extent and how has the project mobilized and used its resources (human, technical and financial) to achieve its planned results since implementation started?

Efficient Resource Mobilization through Partnerships

The project has effectively leveraged existing UNDP resources and external partnerships

Evidence:
- The project works under the Governance Pillar of UNDP Iraq's Programme Portfolio, which helps in cost-effectiveness by leveraging operational support and processes already in place within UNDP Iraq. (Project Document, Cost Efficiency and Effectiveness)
- The project is leveraging partnerships with other ongoing UNDP projects such as the Anti-Corruption in the Arab Countries (ACIAC) Programme, the Anti-Corruption for Trust (ACT) in Iraq, the UNDP Iraq Security Sector Reform (SSR) and Rule of Law programme, UNDP Global Rule of Law Programme, and the Iraq Crisis Response and Resilience Programme. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Management Effectiveness Review)
- Respondents mentioned that the project effectively leveraged UNDP's existing relationships and knowledge of the Iraqi context to mobilize resources.
- Some interviewees noted that partnerships with other UN agencies, such as UNAMI Human Rights Office, enabled trial monitoring activities to be conducted without incurring additional costs for the project.

Structured Resource Planning

The project implemented a comprehensive planning approach for resource allocation

Evidence:
- The project has allocated resources to the corresponding outputs as per the agreement with the EU. The project is currently on track with its objectives and is efficiently utilizing the resources allocated. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Management Effectiveness Review)
- For timely delivery of outputs, the project has developed a quarter-wise detailed implementation plan. In this detailed implementation plan, all the activities and corresponding sub-activities have been chalked down for planning and following up purposes. The project manager and component leads review the detailed implementation plan on a regular basis and update whenever required. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Management Effectiveness Review)
- Key informants reported that during the project's inception period, an assessment was conducted to revise activities, budget requirements, and unit costs based on consultations with stakeholders and analysis of the evolving context.
- Respondents mentioned that the project team worked closely with technical experts to assess resource needs for delivering planned outputs, ensuring resources were allocated efficiently to achieve intended results.

Analysis

Resource mobilization has been efficiently executed through strategic partnerships and leveraging existing UNDP structures. The project's integration within UNDP Iraq's Governance Pillar has enhanced cost-effectiveness by utilizing established operational support and processes. Partnerships with other UNDP projects and UN agencies have allowed for resource sharing and knowledge transfer, maximizing the impact of available resources.

In terms of human and technical resources, the project has effectively deployed expertise for legal framework analysis and reform. Reviews of anti-corruption legislation at both federal and regional levels were conducted, leading to recommendations for improvement. This demonstrates efficient use of technical resources to produce tangible outputs aligned with project objectives.

Financial resources are efficiently managed, with the project reported to be on track with its objectives and efficiently utilizing allocated resources. The assessment conducted during the inception period to revise activities and budget requirements based on stakeholder consultations indicates a proactive approach to ensuring efficient financial resource allocation.

6.4. Effectiveness

6.4.1. What have been the major achievements since the project commenced in 2021?[30] What is the project status with respect to targeted outputs in terms of quality and timelines? To what extent is the project on-track to achieve planned results (intended and unintended)? If there were any delays in the project targets achievement for the performance indicators, what were the causes of the delay, and what was the effectiveness of corrective measures undertaken?

Major Achievements:

- Output 1: Strong progress with over 80% achievement in 3 out of 5 indicators, including the full implementation of the Federal and KRI Anti-Corruption Strategies.
- Output 2: Targets exceeded in case monitoring, training, and SOP development for the justice sector, lawyers, and CoI.
- Output 3: Targets related to training and knowledge improvement have been met or exceeded.
- Output 5: Training of civil society and media organizations on responsible reporting of corruption cases has exceeded the target by a significant margin.

Overview of the Outputs Status:

- Output 1: On track to achieve planned results, with remaining indicators set to be measured or fully achieved by project end.
- Output 2: Significant progress, but enhancement of codes of conduct for judiciary, CoIs, bar associations, and parliaments shows partial progress, requiring further efforts.
- Output 3: Mixed progress, with progress on legislation drafting, adoption, and efficiency improvement through SOPs lagging behind targets.
- Output 4: Limited progress, with overall achievement well below intended targets.
- Output 5: Mixed progress, with the enhancement of strategic outreach capacity of public institutions at 50% of the target, and initiatives to enhance citizen's access to information progressing slower than planned.

Is the project on track to achieve the planned targets?

The project has made significant progress in some areas, particularly in Output 1, Output 2 (case monitoring, training, and SOP development), and Output 5 (training of civil society and media organizations). However, the project is facing challenges in fully achieving targets in several other areas, such as:

- Output 3: Legislation drafting, adoption, and efficiency improvement through SOPs.
- Output 4: Quarterly forum meetings and information sessions for parliament members and staff.
- Output 5: Enhancement of strategic outreach capacity of public institutions and initiatives to enhance citizen's access to information.

Given the project's current status and the remaining timeframe, increased efforts and resources may be required to address the lagging areas and ensure the project comes closer to achieving its overall planned targets by the end of its implementation period.

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[30] The Terms of Reference (ToR) originally posed the evaluation question as follows: "What have been the major achievements and lessons learnt since the project commenced in 2021?" However, to enhance the overall structure and coherence of the report, the findings related to the lessons learned during project implementation are addressed in a separate chapter. This approach allows for a more focused and in-depth analysis of the project's achievements in this section, while providing a dedicated space for discussing the valuable insights gained throughout the project's duration.

Analysis

The report in Annex 8 provides a detailed analysis of each output, examining the progress made against the specific indicators and targets set for each output. It breaks down the achievements, challenges, and current status of each output in a comprehensive manner.

6.4.2. What factors have contributed to achieving the desired results? To what extent do external factors, such as government ownership, security constraints, have impacts on project implementation?

Success Factors

Key success factors include stakeholder empowerment, trust-building, technical expertise, and facilitation of peer learning.

Evidence:
- The Narrative Report from April 2021 to April 2022 notes that "Working together with key Government counterparts throughout from the inception to implementation of interventions helps in empowering the stakeholders, ensures ownership, transparency, and sustainability of programme interventions. Trust has been key to ensure the optimal cooperation of the stakeholders. UNDP has maintained excellence in the quality of services provided, responsiveness to the needs and institutional context, credibility for the quality of the expertise and neutrality among other to build a trusted relationship."
- The same report also highlights that "UNDP has acknowledged the importance of cooperation between federal and KRI institutions. In this regard, UNDP has emphasized on the importance of such cooperation in meetings with federal and KRI leaderships, provided practical solutions and facilitated joint trainings to enhance trust and cooperation at technical levels between federal and KRI public officials."
- The Narrative Report from January 2023 to October 2023 notes under Output 1 that "The Iraqi side readily embraces UNDP proposals and recommendations aimed at enhancing draft laws, especially when these proposals are accompanied by a practical examination of successful approaches from other countries. It is preferred that this examination includes visits to these countries, where their representatives vividly showcase the advantages and efficacy of adhering to international standards. Iraqi partners find these proposals convincing not only when presented by UNDP experts but also when validated by their counterparts from another nation." This demonstrates the value of UNDP's technical expertise and facilitation of peer learning as success factors.
- Several interviewees noted that the focus of the new government on anti-corruption as a main agenda item created an enabling environment for the project to work.
- Some respondents mentioned that the technical experts on the project had a strong understanding of the subject matter and expertise from similar work in other countries, enabling them to effectively carry out project activities in Iraq.
- Interviewees noted that the relationships and coordination the project established with other actors working on anti-corruption helped deliver project results.

Key Contributors

Active engagement of key partners, skilled project team, and strong backing from high-level stakeholders have been essential.

Evidence:
- The ProDoc identifies key partners as "federal (and where applicable regional) commissions of integrity (CoI), government, parliament, and the justice sector." Their active engagement is noted as factor of success.
- The Narrative Reports consistently highlight the role of CoI, Parliament, and Judiciary counterparts in implementing activities across the outputs, demonstrating their central role in driving results. For example, the January-October 2023 report notes under Output 2.5 that "The code of conduct for the judicial subject matter experts, court translators and interpreters are being drafted by the drafting committee appointed by the SJC of Iraq. UNDP shared insights on drafting good CoC with the drafting committee and they will share the final draft with UNDP in the coming quarter."
- Some respondents mentioned that the ACAI project team's skills, team dynamics, and senior management support were key assets.
- Interviewees noted that the project benefited from strong backing from the prime minister, heads of institutions, and the EU. This reportedly enlightened the international community in Iraq about the project's work.

Government Ownership

High-level government commitment and engagement have contributed to project success.

Evidence:
- The ProDoc notes that "The overall project design rests on the assumption that achieving the projects' goal and objectives will require genuine political commitment from the highest levels of authorities and the judiciary in Iraq."
- The Narrative Report from January 2023 to October 2023 notes that "To further strengthen the collaboration between UNDP and the Government of Iraq, a Memorandum of Understanding (MoU) was signed on 12 April 2023 by the Prime Minister's Office and UNDP. This MoU reaffirms the partnership and commitment of both parties to preventing and combating corruption in Iraq to promote transparency, accountability, and integrity in the public and private sectors." This high-level agreement is a strong sign of government ownership.
- Several respondents mentioned that the new government has put anti-corruption efforts at the core of its program, with the prime minister frequently mentioning his commitment to tackling the issue. In consultations, all government authorities reportedly underlined the importance and strategic nature of the ACAI project.

Security Constraints

While identified as a potential high-impact risk, security constraints have not been reported as major impediments to implementation, though they pose ongoing challenges for expert retention and project dynamics.

Evidence:
- The ProDoc in the Risks section identifies that "Highly volatile security conditions prevail and travel within and outside Baghdad with restricted movements leading to delay in implementation of some project activities." The associated risk is rated as Probability 4, Impact 4 (High), demonstrating acknowledgement of the potential impact of the security situation on implementation.
- The reviewed Narrative Reports do not highlight any specific instances where security issues impacted activities.
- Some interviewees noted that retaining international experts to work in Iraq on certain project components is quite challenging due to the security situation.

Analysis

Key success factors include stakeholder empowerment and trust-building, technical expertise and peer learning, strong partnerships and coordination, and a skilled project team supported by high-level stakeholders. Working closely with government counterparts from inception to implementation has fostered ownership, transparency, and sustainability of interventions. The ACAI project team's capabilities, combined with backing from senior management and high-level stakeholders, have been important assets.

Government ownership has been a major positive external factor. The new government's prioritization of anti-corruption efforts, including the Prime Minister's personal commitment, has created an enabling environment for the project. The signing of a Memorandum of Understanding between the Prime Minister's Office and UNDP further demonstrates high-level government buy-in.

Security constraints, while identified as a potential high-impact risk, have not been reported as major impediments to implementation in the reviewed documents. However, they pose ongoing challenges for expert retention and could potentially disrupt project dynamics if an incident were to occur.

6.5. Impact

6.5.1. Does the overall project intervention contribute to longer-term outcomes/results? What is the impact or effect of the intervention in proportion to the overall situation of the target institutions and direct beneficiaries?

Strengthening the Anti-Corruption Framework

The project has contributed to aligning Iraq's anti-corruption legislation with international standards and enhancing strategic planning capabilities, laying a foundation for sustained improvement in the anti-corruption landscape.

Evidence:
- The project supported the Iraqi authorities in aligning domestic anti-corruption legislation with international standards, particularly the UN Convention Against Corruption (UNCAC). This included reviewing and providing recommendations on the Access to Information draft law, Penal Code draft, KRI Shura Council draft law, and KRI Judicial Oversight Authority draft law. (ACAI Narrative Report 30 April 2021 - 29 April 2022, section 1.1)
- The project supported the Federal and KRI Commissions of Integrity (CoIs) in developing implementation plans and oversight mechanisms for their anti-corruption strategies. This involved preparing action plans, providing training on strategy implementation and oversight, and supporting the development of reporting guidelines. (ACAI Narrative Report 30 April 2021 - 29 April 2022, section 1.3)
- Respondents mentioned that the project supported the government in conducting a review of the anti-corruption legal framework in Iraq. Based on the findings, the project reportedly provided technical support in reviewing draft anti-corruption laws to improve them in line with international commitments like UNCAC.
- Some interviewees noted that the project is working on macro level policies to support the government in reviewing, revising and developing new regulations to fight corruption

Fostering a Culture of Integrity and Transparency

Efforts to empower civil society, enhance public reporting mechanisms, and improve institutional communication on anti-corruption issues contribute to building a sustained culture of accountability and transparency.

Evidence:
- Support was provided to the Kurdistan Regional Government to launch a hotline for citizens to report corruption, enhancing access to information and accountability. (ACAI Narrative Report 30 April 2022 - 31 December 2022, Activity 5.4)
- Assessments of the strategic communications capacities of the Federal and KRI Commissions of Integrity were conducted to identify gaps and recommend improvements in their public outreach on anti-corruption. (ACAI Narrative Report Jan 2023 - 8 Oct 2023, Activity 5.1)
- Respondents mentioned that by working with the Commission of Integrity on corruption risk assessment methodology and supporting anti-corruption strategy implementation, the project aims to make anti-corruption a priority despite competing economic and security issues facing the government.

Analysis

In strengthening the anti-corruption framework, the project has made contributions by aligning Iraq's legislation with international standards, particularly the UN Convention Against Corruption. The support provided in developing implementation plans and oversight

mechanisms for anti-corruption strategies at both federal and regional levels lays a solid foundation for sustained improvement in the country's anti-corruption landscape.

The project's efforts in fostering a culture of integrity and transparency through civil society empowerment, enhancing public reporting mechanisms, and improving institutional communication on anti-corruption issues are expected to contribute to a sustained culture of accountability.

6.5.2. What is the potential long-term impact of the project on promoting inclusive development and reducing inequalities in Iraq through its anti-corruption efforts?

The project's anti-corruption efforts have the potential to contribute to more inclusive development by promoting equitable access to resources and services. However, the extent to which the project design and implementation explicitly considered and addressed the differential impacts on marginalized groups is less evident.

The project's theory of change assumes that reducing corruption will lead to more equitable economic development and service delivery, benefiting poor and excluded populations. While this alignment with inclusion goals is positive, the project documentation does not provide a detailed analysis of the specific barriers and drivers of exclusion faced by different marginalized groups in the context of corruption in Iraq.

Enhancing transparency and access to information, a key focus of the project, could empower marginalized citizens to demand accountability. However, the project reports do not highlight targeted efforts to ensure that these mechanisms reach and are utilized by excluded groups. Similarly, while the project's support for civil society and media reporting on corruption has the potential to amplify the voices of marginalized communities, the extent to which these initiatives directly engaged or represented these groups is unclear.

Applying an inclusion lens throughout the project cycle, as recommended by the OECD Guidance, could strengthen the project's ability to understand and address the differential impacts of corruption on marginalized groups. This would involve a more explicit stakeholder analysis to identify excluded groups, an examination of barriers and drivers of exclusion in the theory of change, targeted interventions to address these barriers, and monitoring and evaluation frameworks that capture disaggregated data on inclusion dimensions.

While the project's overall anti-corruption objectives align with the goal of inclusive development, a more proactive and systematic approach to integrating inclusion considerations could enhance its impact on reducing inequalities and empowering marginalized groups in Iraq.

6.5.3. Are there any unintended consequences or alternative pathways that have emerged during project implementation?

Alternative Pathways Emerged During Project Implementation

The project has demonstrated flexibility in adapting to challenges, finding alternative pathways to achieve objectives when faced with staffing changes, political instability, and implementation barriers.

Evidence: - The Narrative Report from April 2021 to April 2022 notes in the "Changes and Way Forward" section that based on year 1 experience and consultations with stakeholders, UNDP aligned the project activities and timeframe as required, including a series of modifications to some project outputs and activities that were communicated to the EU in an inception report. This demonstrates flexibility to adapt the project pathways based on learning during implementation.

- The Narrative Report from April 2022 to December 2022 notes under Output 3 that the specific progress was slower than planned due to the technical expert for that output taking leave from the project. In response, UNDP initiated a process to hire a new team leader supported by short-term experts. This shows an alternative staffing pathway to maintain continuity.
- The Narrative Report from January 2023 to October 2023 mentions under Output 1.5 that the planned High-Level Dialogue Forum could not be established due to a lack of a functioning Parliament and government throughout 2022. As an alternative, UNDP pitched the idea directly to the new government once it was formed, and provided high-level policy advice through a joint UN advisory note which was well received. This demonstrates finding alternative pathways to advance the anti-corruption agenda when the original plan was blocked by external circumstances.

Analysis

The project has demonstrated adaptability in overcoming challenges through alternative pathways. Key examples include realigning activities based on early implementation lessons, adapting staffing strategies to maintain continuity despite personnel changes, and pivoting engagement strategies in response to political instability.

This flexibility has been instrumental in maintaining project momentum in a complex operating environment. The project's ability to quickly adjust its approach while staying focused on core anti-corruption goals indicates effective management and a deep understanding of the local context.

6.6. Sustainability

6.6.1. What are the potential challenges/risks that may prevent the project from producing the intended results? Are there any social or political risks that may jeopardize sustainability of project outputs and the project contributions to country programme outputs and outcomes?

Political Instability and Challenges in Sustaining Anti-Corruption Momentum

While anti-corruption is stated as a high priority for the Iraqi government, political instability and competing priorities pose significant challenges to consistent implementation of reforms and project activities

Evidence:
- The project document identifies political instability, including "inconclusive Parliamentary elections and prolonged formation of the new government" as a high probability and impact risk. This instability can lead to delays in legislative and policy reforms, even when there is stated commitment to anti-corruption efforts. (Project Document, Appendix II: Risk Log, Risk #2)
- While high-level commitment exists, there are challenges in maintaining consistent engagement across all stakeholders. This can result in delays or temporary postponements of project activities. (Adapted from Project Document, Appendix II: Risk Log, Risk #8)
- Several informants suggested that the competing priorities of security and economic issues, alongside political instability, can divert attention and resources from anti-corruption efforts, posing challenges to the project's consistent implementation.
- Some respondents noted that capacity constraints, such as the general lack of knowledge among lawyers to handle anti-corruption cases effectively, present additional challenges to sustaining anti-corruption momentum.

Security Concerns

Significant risk affecting project activities and staff safety

Evidence:
- The project document identifies "highly volatile security conditions prevail and travel within and outside Baghdad with restricted movements" as a high probability and impact risk, potentially leading to temporary pause or delays in project implementation. (Project Document, Appendix II: Risk Log, Risk #3)
- Another risk noted is "project staff physical safety and security at risk due to the highly sensitive nature of the project focus and activities." While rated as low probability, it is seen as a high impact risk that could restrict project staff movements. (Project Document, Appendix II: Risk Log, Risk #4)
- Highly volatile security conditions prevail and travel within and outside Baghdad with restricted movements leading to delay in implementation of some project activities." (Risk Log 2023, Probability 4, Impact 4)
- Multiple interviewees across different stakeholder groups mentioned that the security situation in Iraq, including the presence of militant and militia groups, creates obstacles for project implementation and staff safety.

Operational Challenges

Risks related to staffing, procurement, and coordination affecting project efficiency

Evidence:
- The project document identifies a risk of "difficulty in identifying/attracting qualified national and international technical experts and/or service providers (organizers) to assist in the implementation of activities that require a high level of technical expertise in the anti-corruption and related

fields." This is rated as a medium probability but high impact risk that could affect the quality of project deliverables. (Project Document, Appendix II: Risk Log, Risk #6)
- Another medium probability and high impact operational risk is "being unable to attract and retain high caliber national and international staff/consultants resulting in high staff turn-over. Operational delays in staff/consultant/service provider hiring leading to project implementation delays." (Project Document, Appendix II: Risk Log, Risk #7)
- "Difficulty in identifying/ attracting qualified national and international technical experts and/or service providers to assist in the implementation of activities that require a high level of technical expertise in the anti-corruption and commercial dispute resolution fields." (Risk Log 2023, Probability 3, Impact 5)
- Several respondents noted that understaffing and prolonged hiring processes hinder the project's operational capacity.
- Some interviewees mentioned that coordination obstacles with stakeholders, such as conflicting schedules and limited availability, affect project activities and timelines.

Institutional Resistance and Cultural Factors

Obstacles in implementing reforms due to institutional and cultural barriers

Evidence:
- The project document notes a risk of "lack or limited willingness between federal and KRI public institutions to work together on specific issues." This is rated as a medium probability and high impact risk that could result in entities being unwilling to cooperate and proactively engage in advancing the project. (Project Document, Appendix II: Risk Log, Risk #12)
- "Lack of buy-in from Iraqi judicial, political and government stakeholders and they are unwilling to genuinely commit to/ engage in advancing anti-corruption work." (Risk Log 2023, Probability 4, Impact 5)
- A few respondents suggested that conservative culture and resistance within judicial institutions question the necessity of specialized anti-corruption commissions, viewing corruption solely as a criminal matter.
- Some interviewees noted that a significant gap and lack of trust exist between government institutions and civil society in collaborating on anti-corruption efforts, with limited access to information and opportunities for civil society to contribute.

Analysis

Political instability and lack of political will pose a high probability and high impact risk to the project. Prolonged government formation processes and potential lack of commitment from key stakeholders could lead to delays in implementing legislative and policy reforms important to the project's success. The government's focus on security and economic issues may further sideline anti-corruption efforts.

Security concerns represent another significant risk. The volatile security situation in Iraq, including the presence of militant groups, creates challenges for project implementation and staff safety.

Operational obstacles, including difficulties in attracting and retaining qualified staff and experts, pose risks to project efficiency and the quality of deliverables. Prolonged hiring processes and coordination challenges with stakeholders further compound these issues.

Institutional resistance and cultural factors present additional obstacles. There is limited willingness between federal and Kurdistan Regional Government institutions to collaborate

on certain issues. Conservative culture within judicial institutions and a lack of trust between government and civil society also hinder effective anti-corruption efforts.

6.6.2. Analyzing whether benefits of the project are likely to continue after the project cycle.

Mid-Term Benefits Likely to Continue After Project Ends

The project has implemented a number of initiatives with potential for long-term impact:

Evidence:
- The adoption of the Access to Information Law and potential passage of an improved Public Procurement Law, both drafted with UNDP support, will provide a lasting legal framework to promote transparency and combat corruption in Iraq even after the project's conclusion. (ACAI Narrative Report Jan 2023 - 8 Oct 2023, section 1.1 and 1.4)
- The capacities built within the Iraqi judiciary and Commissions of Integrity through extensive training on ethics, anti-corruption investigations, and commercial dispute resolution will remain with these institutions and enhance their functioning beyond the project timeline. The adoption of codes of conduct will institutionalize integrity standards. (ACAI Narrative Report 30 April 2022 - 31 December 2022, sections 2.2, 2.5, 2.6 and Output 3.3)
- The informal network of trained civil society activists and journalists planning to establish an NGO will provide a sustainable platform for continued anti-corruption reporting and advocacy after the project. (ACAI Narrative Report Jan 2023 - 8 Oct 2023, Activity 5.3)
- The MoU with the American University in Baghdad for collaboration on anti-corruption and commercial arbitration education will have a long-term impact by enabling the university to integrate these subjects into its curriculum and train successive student cohorts. (ACAI Narrative Report Jan 2023 - 8 Oct 2023, Output 3.3)
- The establishment of a commercial court in KRI and needs assessment of commercial courts will inform judicial reform efforts to improve the handling of business disputes more efficiently long after the project ends. (ACAI Narrative Report 30 April 2022 - 31 December 2022, Output 3.2; ACAI Narrative Report Jan 2023 - 8 Oct 2023, Output 3.2)
- Government approval for allowing arbitration centers and agreement to finalize the draft Arbitration Law in line with the UNCITRAL model[31] will pave the way for modernizing Iraq's arbitration infrastructure and building confidence among businesses even if the law is passed after the project timeline. (ACAI Narrative Report 30 April 2021 - 29 April 2022, Output 3.1; ACAI Narrative Report Jan 2023 - 8 Oct 2023, Output 3.1)
- Some interviewees noted that the project is working to build a staff within institutions who have the capability and willingness to train their own staff on topics like code of conduct, corruption investigation, and negotiation. This training of trainers approach reportedly aims to institutionalize capacity building.
- Respondents mentioned that judicial codes of conduct for judges, experts, and translators drafted with project support will have a lasting impact if adhered to after the project ends. Non-compliance with the codes is reportedly seen as the main risk to sustainability.

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[31] United Nations Commission on International Trade Law (UNCITRAL), UNCITRAL Model Law on International Commercial Arbitration (1985), with amendments as adopted in 2006 (Vienna: United Nations, 2008), https://uncitral.un.org/en/texts/arbitration/modellaw/commercial_arbitration

- Some interviewees noted that the project supported establishing digital forensics labs in the two Commissions of Integrity to build sustainable capacity for corruption investigations.
- Respondents mentioned that the establishment of a network of trained activists and journalists working collectively on anti-corruption investigations helps them continue their work in a more secure manner after the project ends.

Analysis

The project demonstrates strong potential for continued benefits after its conclusion, particularly in key areas such as legal and policy frameworks, institutional capacity, civil society engagement, education, commercial dispute resolution, and technological advancements in anti-corruption efforts.

Legislative improvements, such as the Access to Information Law, and enhanced capacities within judicial and integrity institutions through training and the adoption of codes of conduct, are expected to have lasting impacts. The establishment of civil society networks and collaborations with educational institutions should contribute to sustained anti-corruption advocacy and awareness.

Improvements in commercial dispute resolution and the introduction of digital forensics capabilities in anti-corruption agencies also promise long-term benefits. However, the sustainability of these gains depends on continued political will, adequate resource allocation, and adherence to new standards and practices.

While the project has created a strong foundation for lasting impact through institutionalized capacity building and self-sustaining mechanisms, ongoing support and adaptation by Iraqi institutions and civil society will be essential to fully realize and maintain these potential long-term benefits.

6.6.3. Does the project have the capacity to sustain its operations in terms of financial and programmatic implementation?

Financial Capacity

The project demonstrates strong financial capacity for its current implementation phase, but there are potential challenges for long-term sustainability.

Evidence:
- The project has a total budget of USD 17,611,500 funded by the European Union for a duration of 48 months from April 2021 to April 2025. (Project Document, Project Summary Sheet)
- The project budget is allocated across the five key outputs: 1) Improved legislative and strategic framework for anti-corruption (USD 2,579,713); 2) Justice sector capacity building (USD 5,330,454); 3) Commercial dispute resolution (USD 2,703,992); 4) Parliamentary engagement (USD 2,703,992); and 5) Transparency and accountability (USD 3,141,194). (Project Document, Appendix V: Indicative Output-Based Budget)
- The project leverages operational efficiencies by being integrated into UNDP Iraq's governance programme and utilizing existing staff capacities across projects. Common services and long-term agreements with vendors enable cost savings. (Project Document, Section IV: Project Management)
- Some interviewees noted that the EU as the donor has been timely in releasing payments. As per the agreement, once 70% of a funding tranche is utilized and reported on, the next tranche is reportedly released within 3 months. This has reportedly helped avoid cash flow issues.
- Respondents mentioned that careful budgeting during project design, incorporating lessons from the inception phase, has enabled smooth

utilization of funds. A contract amendment was reportedly made to reallocate funds based on the inception phase learning, allowing the project to be responsive to needs.
- Some interviewees noted that reliance on just one donor (the EU) for funding is seen as a risk for sustainability. Diversifying the sources of funding and getting government buy-in to co-finance activities are reportedly suggested to improve financial sustainability.

Programmatic Capacity

The project demonstrates programmatic capacity for sustained operations, leveraging UNDP's extensive experience, specialized expertise, strategic partnerships, and adaptive management practices to effectively deliver anti-corruption and governance interventions in Iraq.

Evidence:
- UNDP has a long-standing presence in Iraq since 1976 and extensive experience implementing governance projects, including previous anti-corruption and justice sector initiatives, providing institutional knowledge and established partnerships to deliver the project effectively. (Project Document, Section II.III: UN partnerships)
- The project has a dedicated Project Management Unit (PMU) consisting of a Project Manager, Project Management Specialist, M&E and Reporting Specialist, and a Project Associate handling day-to-day implementation, financial management, monitoring, and donor reporting. (Project Document, Section IV: Project Management)
- A multi-disciplinary team of national and international technical experts in anti-corruption, legislation, investigations, integrity, and commercial dispute resolution is budgeted to provide specialized expertise to support implementation. (Project Document, Section IV: Project Management)
- The project design leverages partnerships with other UN agencies like UNODC (for corruption prevention and asset recovery) and UNAMI (for trial monitoring) as well as coordinates with other donor initiatives to enable holistic coverage of anti-corruption and justice needs in Iraq. (Project Document, Section II.III: UN partnerships)
- The project has a sound monitoring and evaluation plan, including quarterly progress reviews and monitoring by the Project Board and UNDP Programme Assurance, enabling course corrections. (Project Document, Section V: Monitoring and Evaluation)
- Respondents across different stakeholder groups mentioned that the project team's technical expertise, understanding of the Iraqi context, and strong networks with government stakeholders contribute to their capacity to sustain programmatic operations.
- Some interviewees noted that flexibility to respond to emerging needs, such as supporting digitalization of corruption investigations based on government demand, shows the project's capacity to adapt its programming for continued relevance.
- Respondents mentioned that institutional relationships and trust built with key government and civil society stakeholders is seen as an asset for the project to leverage for sustainability, as stakeholders now reportedly see the project as a credible long-term partner.

Analysis

Financially, the project is well-positioned for its current implementation phase. With a substantial budget of USD 17,611,500 funded by the European Union, the project has secure funding until April 2025. UNDP's financial management practices, including the

ability to advance funds and leverage operational efficiencies, contribute to the project's financial stability. The EU's timely release of payments based on utilization rates has helped avoid cash flow issues, and careful budgeting has enabled smooth fund utilization.

However, the reliance on a single donor (EU) for funding is a potential risk for long-term financial sustainability. Diversifying funding sources and securing government co-financing could enhance financial stability beyond the current project period.

Programmatically, the project demonstrates capacity for sustained operations. UNDP's long-standing presence in Iraq, extensive experience in governance projects, and established partnerships provide a strong foundation for effective delivery. The dedicated Project Management Unit, supported by a multi-disciplinary team of experts, ensures specialized expertise and day-to-day management capacity.

The project's programmatic strength is further enhanced by strategic partnerships with other UN agencies and donor initiatives, enabling coverage of anti-corruption and justice needs. The monitoring and evaluation plan allows for adaptive management, ensuring the project remains relevant and effective.

The project team's technical expertise, understanding of the Iraqi context, and strong networks with government stakeholders contribute to the capacity for sustained programmatic operations. The flexibility to respond to emerging needs, such as supporting the digitalization of corruption investigations, demonstrates the project's adaptability and continued relevance.

6.6.4. How strong and sustainable are UNDP systems and processes in place to continue delivering quality services to the partners?

Results-Based Management and Accountability Mechanisms

The project employs results frameworks, independent oversight, and regular reporting to ensure accountability and track progress towards objectives.

Evidence:
- The project has a Results and Resources Framework with clearly defined outputs, indicators, baselines, and annual targets to track progress. Monitoring methods and frequencies are specified for each indicator. (Project Document, Results Framework)
- UNDP's Programme Assurance function, delegated to the Governance Pillar and Programme Management Support Unit, is responsible for objective and independent project oversight and monitoring to ensure achievement of results. (Project Document, Section VI: Governance and Management Arrangements)
- Some interviewees noted that the project team submits periodic reports to the donor and complies with corporate reporting requirements.

Adaptive Management and Flexibility

UNDP demonstrates strong adaptability, revising project designs based on stakeholder input and adjusting implementation strategies in response to challenges

Evidence:
- The project conducted an extensive inception phase to validate the project design and results framework with stakeholders. Based on the inception phase findings and consultations, revisions were made to the project outputs, activities, and budget which were communicated to the EU through an inception report and amendment request, demonstrating adaptability. (ACAI Narrative Report 30 April 2021 - 29 April 2022, Executive Summary)
- When faced with delays in the Council of Representatives elections, the project adapted by focusing on activities like trainings and assessments that could proceed without Parliament in place. The project also adjusted to

COVID-19 restrictions by conducting some activities virtually. (ACAI Narrative Report 30 April 2021 - 29 April 2022, Challenges and Mitigation Measures)
- Respondents mentioned that the project adapted to challenges such as hiring delays and stakeholder availability by utilizing internal UNDP expertise and rescheduling activities.

Quality Assurance and Oversight

Quality assurance measures are in place, including a dedicated Project Board, adherence to UNDP standards, and regular reviews by both UNDP and the donor.

Evidence:
- The project has established a Project Board chaired by UNDP and co-chaired by the EU Delegation with representation from key government stakeholders to review project progress, monitor risks, approve work plans, and provide strategic direction. (Project Document, Section VI: Governance and Management Arrangements)
- The project is subject to UNDP's Social and Environmental Standards and Accountability Mechanism and follows strict quality management procedures. An annual project quality assurance review will be conducted by UNDP. (Project Document, Section VIII: Risk Management)
- Some interviewees noted that UNDP's governance pillar and the project team provide quality assurance for the project.

Analysis

Results-based management and accountability mechanisms are well-developed, featuring results frameworks, independent oversight, and regular reporting. The project employs a detailed Results and Resources Framework, utilizes UNDP's Programme Assurance function for objective monitoring, and maintains a comprehensive M&E system. These mechanisms ensure accountability and effective tracking of progress towards objectives.

Adaptive management and flexibility are key strengths of UNDP's approach. The project has demonstrated adaptability, revising designs based on stakeholder input and adjusting implementation strategies in response to challenges such as political delays and COVID-19 restrictions. This flexibility allows the project to remain relevant and effective in a dynamic environment.

Quality assurance and oversight mechanisms are in place, including a dedicated Project Board, adherence to UNDP standards, and regular reviews by both UNDP and the donor. These measures ensure ongoing quality control and strategic alignment of project activities.

The project's focus on capacity building and knowledge management supports sustainable service delivery. By prioritizing sustainable capacity development within Iraqi institutions and capturing lessons learned, UNDP is building local capabilities and informing future interventions.

6.6.5. What lessons related to sustainability can we draw from the execution of the project?

Challenges Overcome

The project demonstrated resilience in the face of political instability, security concerns, and pandemic-related restrictions, highlighting the importance of adaptability for sustainable implementation.

Evidence:
- Despite political instability and security concerns, the project was able to engage key government partners and adapt implementation as needed to

achieve objectives (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Executive Summary)

- Respondents mentioned that despite delays in the legislative process, the project persisted in advocating for anti-corruption reforms and engaging stakeholders.
- Some interviewees noted that the project adapted to the limited availability of international expertise for the commercial arbitration component by eventually securing a dedicated expert.

Lessons:

Lesson 1: Adaptability is key to sustainability in challenging contexts

The ACAI project faced significant challenges, including political instability, security concerns, and pandemic-related restrictions. However, the project demonstrated resilience and adaptability in the face of these obstacles. By engaging key government partners and adjusting implementation strategies as needed, the project was able to achieve its objectives despite the difficult circumstances.

This highlights the importance of adaptability for sustainable project implementation. When operating in complex and unpredictable environments, projects must be flexible and able to adjust their approach in response to changing conditions. This may involve modifying timelines, finding alternative ways to engage stakeholders, or identifying creative solutions to unexpected challenges.

Lesson 2: Persistence and advocacy are essential for driving long-term change

The project encountered delays in the legislative process related to anti-corruption reforms. However, rather than abandoning this objective, the project persisted in advocating for these reforms and engaging stakeholders. This persistence demonstrates the importance of long-term commitment to driving sustainable change.

Reforms and institutional changes often take time, and projects must be prepared to stay the course and continue advocating for their objectives even in the face of setbacks or delays. By maintaining a focus on long-term goals and consistently engaging stakeholders, projects can build the momentum and support needed to achieve sustainable impact.

Lesson 3: Securing dedicated expertise can help overcome capacity constraints

The project initially faced challenges in securing international expertise for the commercial arbitration component. However, by eventually securing a dedicated expert, the project was able to overcome this capacity constraint and move forward with implementation.

This highlights the importance of identifying and securing the specific expertise needed to support sustainable project outcomes. When local capacity is limited, bringing in dedicated experts can help fill gaps and ensure that projects have the knowledge and skills needed to achieve their objectives. This may require persistence and creativity in identifying and engaging the right experts, but it can be critical to long-term success.

Adaptability Measures

Flexibility in project design and implementation, including revising outputs and activities based on emerging needs and context, proved essential for maintaining relevance and effectiveness.

Evidence:	- Based on extensive consultations during the inception period, some project outputs and activities were adjusted to fit the emerging needs and country context. Modifications were communicated to the EU through the inception report. (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Executive Summary) - Under Output 3, project outputs and activities were realigned towards an inclusive justice approach involving local and international businesses, investors and contractors, based on existing and emerging needs of Iraq (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Output 3 progress) - Respondents mentioned that the project adjusted its approach to meet beneficiaries' needs, such as providing legal experts to support investigative journalists and establishing an anti-corruption network. - Some interviewees noted that when faced with resistance to certain terminology (e.g., gender), the project rephrased its language to women's empowerment to ensure acceptance and continued progress.
Lessons:	**Lesson 4: Designing for flexibility enhances project relevance and effectiveness** The ACAI project demonstrated the importance of flexibility in project design and implementation. Based on extensive consultations during the inception period, the project adjusted some of its outputs and activities to better align with the emerging needs and country context. These modifications were communicated to stakeholders through the inception report, ensuring transparency and buy-in. This adaptability allowed the project to maintain its relevance and effectiveness in the face of evolving circumstances. By being responsive to the needs of beneficiaries and the realities on the ground, the project was able to deliver interventions that met the real-time priorities of the communities it served. **Lesson 5: Realigning project focus based on emerging needs supports sustainable impact** Under Output 3, the project realigned its focus towards an inclusive justice approach involving local and international businesses, investors, and contractors. This shift was based on an assessment of the existing and emerging needs in Iraq, rather than strictly adhering to the original project plan. This demonstrates the value of continually assessing the context and being willing to realign project focus as needed to meet the most pressing needs. By staying attuned to the evolving priorities of beneficiaries and stakeholders, projects can ensure that their interventions are targeting the areas of greatest potential impact, thereby supporting more sustainable outcomes. **Lesson 6: Adapting communication and terminology can help overcome resistance and ensure progress** In some cases, the project encountered resistance to certain terminology, such as "gender." Rather than insisting on using this language, the project adapted its communication to refer to "women's empowerment." This shift in terminology helped ensure acceptance and allowed the project to continue making progress towards its objectives.

This highlights the importance of being sensitive to local contexts and willing to adapt communication strategies as needed. By using language that resonates with beneficiaries and stakeholders, projects can help overcome resistance, build trust, and foster the buy-in needed for sustainable change. This may require flexibility and creativity in how key concepts and objectives are framed and communicated.

Stakeholder Engagement Strategies

Close coordination and consultative approaches with diverse stakeholders at federal and regional levels enhanced ownership and tailored interventions to specific needs, supporting long-term sustainability.

Evidence:
- The project kept close coordination with key federal and regional partners including commissions of integrity, government, parliament, justice sector, civil society and academia (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Executive Summary)
- Consultations with relevant stakeholders allowed tailoring project activities to stakeholder needs while considering the complex socio-economic, political and governance context (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Participatory/Consultative Processes)
- Respondents mentioned that the project fostered strong, trusting relationships with key institutions through consistent engagement, leading to unprecedented access and cooperation.
- Some interviewees noted that workshops and training were designed consultatively with stakeholders to ensure relevance and buy-in.

Lessons:

Lesson 7: Close coordination with diverse stakeholders enhances ownership and sustainability

The ACAI project prioritized close coordination with a wide range of stakeholders at both the federal and regional levels. This included commissions of integrity, government entities, parliament, the justice sector, civil society, and academia. By engaging with this diverse group of partners, the project was able to build broad-based ownership and support for its initiatives.

This level of stakeholder engagement is critical for long-term sustainability. When stakeholders are closely involved in the design and implementation of project activities, they are more likely to feel a sense of ownership and commitment to the outcomes. This can help ensure that the impact of the project is sustained beyond the initial intervention period, as stakeholders have the motivation and capacity to carry the work forward.

Lesson 8: Tailoring interventions to specific needs through consultation supports relevance and effectiveness

The project used consultative processes to tailor its activities to the specific needs of stakeholders, while also taking into account the complex socio-economic, political, and governance context in Iraq. This approach helped ensure that interventions were relevant and responsive to the real challenges and priorities on the ground.

By investing time in understanding the nuances of the local context and the perspectives of different stakeholders, projects can design interventions that are more likely to be effective and sustainable. This may require a greater upfront investment in consultation and needs assessment, but it can pay significant dividends in terms of the long-term impact and relevance of the project.

Lesson 9: Consistent engagement builds trust and cooperation for sustainable change

Through consistent engagement, the ACAI project was able to foster strong, trusting relationships with key institutions. This led to unprecedented levels of access and cooperation, which were essential for achieving the project's objectives.

This highlights the importance of investing in relationship-building and consistent engagement over time. Trust is not built overnight, but through repeated interactions and demonstrations of reliability and commitment. By prioritizing consistent engagement, projects can gradually build the trust needed to tackle sensitive issues and drive sustainable change.

Lesson 10: Consultative design of capacity building enhances relevance and buy-in

The project designed its workshops and training programs in consultation with stakeholders to ensure their relevance and to secure buy-in. This consultative approach to capacity building helped ensure that the content and format of these interventions met the real needs and preferences of participants.

When stakeholders are involved in the design of capacity building initiatives, they are more likely to see the value and relevance of these activities. This can enhance motivation and engagement, leading to more effective learning and application of new skills and knowledge. Ultimately, this consultative approach to capacity building can contribute to more sustainable outcomes, as stakeholders have the ownership and commitment needed to put their new capacities into practice.

6.6.6. What are national partners' resources, motivation and ability to continue implementing project till end?

Resources

National partners are utilizing existing government structures, with potential for integrating project activities into federal or regional budgets. There is interest in digital transformation investments, but concrete resource allocations remain limited.

Evidence:
- The project works closely with existing government structures and seeks to ensure activities started will be continued by government partners, such as training through the Anti-Corruption Academy, Judicial Training Institute and Bar Association (ProDoc, Sustainability)
- Adoption of anti-corruption legislation and policy requires processes that will become an integral part of federal or regional budgets (ProDoc, Sustainability per output)
- Respondents mentioned that the government has expressed interest in investing in digital transformation to support anti-corruption efforts, showing potential for resource allocation.

Motivation

There is evidence of commitment to anti-corruption efforts at high levels of government, with both federal and regional administrations identifying these as priorities. However, the translation of this commitment into sustained action faces challenges due to competing priorities and institutional constraints. National partners have demonstrated engagement in project activities, though the depth of ownership varies across different institutions and levels of government.

Evidence:

- The new Iraqi government identified anti-corruption efforts and administrative reforms as key priorities in its Government Programme (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Context)
- There is earnestness displayed by the Prime Minister in attempting to change how corruption is dealt with. The federal Commission of Integrity is expected to follow parts of the draft anti-corruption strategy even if it is not formally approved. (ProDoc, Activity 1.3 context)
- Kurdistan Regional Government's Council of Ministers is eager to take a more active role on anti-corruption, as evidenced by the draft law on Supreme Council for Public Reform and Anti-Corruption (ProDoc, Activity 1.3 context)
- Multiple interviewees across different stakeholder groups noted that national partners have shown high levels of engagement and ownership, actively participating in project activities and expressing a desire for continued support.

Ability

Capacity has been enhanced through the project, particularly in the justice sector. However, there are uncertainties about the ability to maintain momentum without continued external support.

Evidence:
- One major shortcoming of Iraq's previous Anti-Corruption Strategy was that the Commission of Integrity, as the sole entity responsible for overseeing implementation, was not powerful enough to advance implementation with legislative and executive authorities (ProDoc, Activity 1.3 context)
- Capacities of investigators and judges developed through the project will allow them to change justice practices, while institutional changes from new integrity standards will enhance rule of law culture for the long-term (ProDoc, Sustainability per output)
- Skills acquired by individuals will be transferred within the community of investigators and judges, and new integrity rules will apply across institutions (ProDoc, Sustainability per output)
- Some respondents mentioned that national partners have gained knowledge and skills through the project's capacity building efforts, enabling them to better investigate and prosecute corruption cases.
- Interviewees noted that the project has worked to institutionalize training curricula and resources within partner institutions to enable sustained implementation.
- Some respondents mentioned that beneficiaries expressed doubts about their ability to maintain momentum and achieve impact without continued support and protection from the project.

Analysis

Resources-wise, the project has strategically integrated its activities into existing government structures, which provides a foundation for sustainability. There is potential for incorporating project activities into federal or regional budgets, particularly with the government's expressed interest in digital transformation investments to support anti-corruption efforts. However, concrete resource allocations remain limited, which could pose challenges for the project's continuation and long-term sustainability.

Motivation among national partners is evidently a strong point. Both federal and regional governments have prioritized anti-corruption efforts, with the Prime Minister identifying it as a key priority. The high levels of engagement and ownership demonstrated by national partners in project activities indicate a strong commitment to the project's goals. This

motivation provides a solid foundation for continued implementation and potential sustainability of project outcomes.

In terms of ability, the project enhanced the capacity of national partners, particularly in the justice sector. The transfer of skills within the community of investigators and judges, along with the institutionalization of new integrity standards, suggests an improved ability to combat corruption. The project's efforts to embed training curricula and resources within partner institutions further support sustained implementation.

6.6.7. To what extent is there constructive cooperation among the project partners? What are the levels of satisfaction of government counterparts, etc.?

Quality of Cooperation

Commission of Integrity (CoI):

Evidence:
- UNDP provided support to both federal and KRI CoIs in reviewing the guidelines and procedures for implementation or oversight of the anti-corruption strategies (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.3)
- UNDP held meetings with federal and KRI CoIs to understand the status of anti-corruption strategies and discuss possible implementation mechanisms (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.3)

Higher Judicial Council (HJC):

Evidence:
- UNDP collaborated with the Higher Judicial Council to organize workshops for judges on developing codes of conduct (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 2.5)
- Multiple interviewees noted that the project has a strong, productive relationship with HJC. The Council has reportedly been open and cooperative, granting unprecedented access for trial monitoring and collaborating on the development of a Judicial Code of Conduct.

Parliament:

Evidence:
- UNDP organized meetings with both federal and KRI parliaments to discuss and review parliamentary codes of conduct (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 4.1)
- Parliament requested UNDP to provide information sessions on UNCAC and the Doha Declaration (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 4.1)
- Some respondents mentioned that engagement with Parliament has been limited due to its suspension in the Kurdistan region and challenges in scheduling activities.

International Partners:

Evidence:
- UNDP convened an Anti-Corruption Coordination Forum with international partners including EU, EUAM, NMI, US/UK Embassies, UNODC, World Bank etc. to discuss anti-corruption efforts in Iraq (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Activity 1.6)
- UNDP collaborates with Transparency International and GIZ on anti-corruption topics like the CPI ranking of Iraq (ACAI Narrative Report 30th of April 2021- 29th of April 2022, Alignment and Coordination)

Civil Society:

| Evidence: | - | UNDP's previous work with civil society under other projects provided a foundation to enable selected civil society and media organizations to report responsibly on corruption (ProDoc, Activity 5.3) |
| | - | Interviewees noted that the project consulted with civil society organizations in developing anti-corruption recommendations and has worked to build the capacity of journalists and activists. However, some respondents felt that CSOs could be more actively engaged in legislative review processes. |

Analysis

The Commission of Integrity (CoI) shows a high level of cooperation, with the project providing support in reviewing guidelines and procedures for anti-corruption strategies. The Higher Judicial Council (HJC) stands out as a particularly strong partnership. The project has established a productive relationship with the HJC, collaborating on initiatives such as developing a Judicial Code of Conduct and implementing trial monitoring. Cooperation with Parliament has been more limited, primarily due to external factors such as the suspension of the Kurdistan regional parliament and scheduling difficulties. Despite these challenges, there have been positive engagements, including Parliament's request for information sessions on international anti-corruption conventions.

The project has effectively engaged with international partners, convening an Anti-Corruption Coordination Forum and collaborating with organizations like Transparency International and GIZ. Cooperation with UN agencies such as UNAMI, UNODC, and UNICEF has been productive, leveraging their expertise and resources.

Overall satisfaction levels among government counterparts and beneficiaries are reported to be high. An independent EU mission highlighted encouraging results and positive feedback from stakeholders. Government counterparts have expressed appreciation for the training and expertise provided.

6.6.8. What is the likelihood that project results will be sustainable in terms of systems institutions financing and anticipated impact?

Systems

Efforts to establish new organizational cultures, procedures, and frameworks show potential for systemic change, including improved communication with citizens and more efficient corruption investigations.

Evidence:	-	The project aims to set an organizational culture of communication and interaction with citizens, civil society and media that will become an integral part of the functioning of public institutions (ProDoc, Sustainability per output)
	-	Standard operating procedures developed for corruption investigations will serve as guides for effective anti-corruption investigations (ProDoc, Activity 2.4)
	-	Establishing commercial courts and modernizing enforcement departments under the judiciary will make enforcement of arbitral awards more efficient in terms of cost and time (ACAI Narrative Report Jan 2023 - Oct 2023, Output 3.2)
	-	Some interviewees mentioned that the project has supported the development of an anti-corruption strategic framework and the adoption of a Judicial Code of Conduct, which provide a foundation for sustained anti-corruption efforts.
	-	Respondents noted that training curricula and resources have been institutionalized within partner institutions to enable ongoing capacity building.

Institutions

Strong institutional ownership and capacity building efforts increase the likelihood of sustained engagement. New integrity standards and norms are expected to enhance the rule of law culture long-term.

Evidence:
- Institutional changes resulting from new integrity standards and norms embedded in the judiciary and Commissions of Integrity will enhance a culture of rule of law for decades (ProDoc, Sustainability per output)
- Capacities developed in arbitral matters will stay beyond the project lifetime (ProDoc, Sustainability per output)
- Skills acquired by individuals will be transferred within the community of investigators and judges, and integrity rules will apply across institutions (ProDoc, Sustainability per output)
- Multiple interviewees across different stakeholder groups mentioned that the project has fostered strong ownership and commitment among key institutions like the Commission of Integrity, Higher Judicial Council, and Parliament, increasing the likelihood of continued engagement.
- Some respondents noted that capacity building efforts have focused on training the trainers within institutions to ensure sustainable knowledge transfer.

Government Resource Availability

The availability of government resources to support scaling and replication of project activities may be constrained by budgetary limitations and competing priorities.

Evidence:
- The project document notes that the scarcity of government resources allocated to anti-corruption institutions is a constraint to their effectiveness. (Project Document, Section I. Development Challenge)
- While the project aims to advocate for increased resource allocation for anti-corruption efforts, government budget constraints, especially considering economic challenges and competing priorities, may limit the availability of resources for replicating project activities. (Project Document, Section II.I. Advancing cautiously in a supportive political climate to achieve sustainable long-term results)
- Interviewees mentioned that the availability of government resources, both financial and human, will play a significant role in the scaling and replication of project components.
- Some respondents noted that while the government has demonstrated interest and commitment, the allocation of adequate resources to support the expansion of activities may be influenced by competing priorities and budgetary constraints.
- Interviewees mentioned that ensuring the sustainability of scaled or replicated components will require the government to allocate sufficient resources and explore innovative financing mechanisms.

Anticipated Impact

The potential for long-term impact is significant, particularly in legal frameworks, institutional capacity, and commercial dispute resolution. However, sustainability may be affected by political instability, shifting priorities, and resource constraints.

Evidence:
- Together, the individual and institutional capacity outcomes will result in institutions trusted by citizens (ProDoc, Sustainability per output)

- Adoption of the new arbitration law will bring Iraq's procedural legislation in harmony with the New York Convention and best international standards, important for Iraq to become an arbitration-friendly state (ACAI Narrative Report Jan 2023 - Oct 2023, Output 3.1)
- Establishing domestic arbitration and mediation institutions will allow access to supportive informal justice mechanisms, build local expertise and culture, and turn Iraq into a commercial dispute resolution hub in the region (ACAI Narrative Report Jan 2023 - Oct 2023, Output 3.2)
- Some respondents noted that the project's work on strengthening the legal framework and building institutional capacity is expected to have a lasting impact on anti-corruption efforts in Iraq.
- Interviewees mentioned that increased public awareness and engagement of civil society, journalists, and activists are expected to maintain pressure for sustained anti-corruption reforms.
- However, some respondents noted that the long-term impact may be affected by political instability, shifting government priorities, and the need for continued financial support.

Analysis

In terms of systems, the project has made efforts to establish new organizational cultures, procedures, and frameworks that have the potential for lasting systemic change. The development of standard operating procedures for corruption investigations, the establishment of commercial courts, and the adoption of a Judicial Code of Conduct provide a solid foundation for sustained anti-corruption efforts. The institutionalization of training curricula within partner institutions also supports ongoing capacity building.

Institutionally, there are positive indicators for sustainability. Strong ownership and commitment among key institutions like the Commission of Integrity, Higher Judicial Council, and Parliament increase the likelihood of continued engagement. The focus on training trainers within institutions and the embedding of new integrity standards and norms in the judiciary and Commissions of Integrity are expected to enhance the rule of law culture long-term.

However, financing presents a challenge to sustainability. While some of the outcomes are designed to be integrated into government budgets, there is substantial reliance on external funding, particularly from the EU. Limited concrete financial commitments from the government raise questions about the long-term sustainability once external funding ends.

The anticipated impact is substantial, particularly in strengthening legal frameworks, building institutional capacity, and improving commercial dispute resolution. The potential for Iraq to become a regional hub for commercial dispute resolution is a noteworthy potential long-term impact. Increased public awareness and civil society engagement also bode well for sustained pressure for anti-corruption reforms.

6.7. Scalability/ Replicability

6.7.1. What components of the project show greater likelihood for scalability and why? How likely is the project or its components to be scaled or replicated by relevant ministries in government?

Assessment of Replicability of Project's Components

The project's components, especially in areas of legislative reform, institutional strengthening, and capacity building, show promising potential for replication by relevant government ministries.

Evidence:
- The project's focus on legislative reforms, institutional strengthening, and capacity building in anti-corruption and commercial dispute resolution align with the mandates and interests of key government partners such as the Commissions of Integrity, Ministry of Planning, and Supreme Judicial Council. This increases the potential for replication by these institutions. (Annual Progress Report, 30 April 2021 to 29 April 2022, Section I. Context)
- The project's engagement with government partners in the design and implementation of activities, such as joint development of training programs and standard operating procedures, could facilitate their ability to replicate successful approaches. (Annual Progress Report, 30 April 2021 to 29 April 2022, Section II. Project Progress)
- Multiple interviewees across different stakeholder groups mentioned that the project's components, especially trial monitoring, arbitration, legislative reforms, and capacity building, demonstrate a high likelihood of being scaled or replicated by relevant government ministries.
- Respondents noted that the alignment of these components with national priorities and the strong interest and demand from key stakeholders indicate a favorable environment for government-led replication.
- However, some interviewees mentioned that the success of scaling and replication efforts will depend on the government's institutional capacity, resource availability, and the compatibility of project activities with existing systems.

Success Factors for Scaling

Key factors supporting scalability include close collaboration with Iraqi counterparts, transferable skills development, improved stakeholder relationships, and alignment with government priorities.

Evidence:
- The project aims to work closely with key Iraqi counterparts and build their capacity, which could enable them to lead the expansion of successful interventions. (Project Document, Section II. Strategy)
- Transferable skills learned by the project's target groups could enable replication of activities more widely within Iraq. (Project Document, Section II.V. Sustainability)
- Improved relationships developed between anti-corruption institutions, the justice sector, civil society and media could facilitate collaboration to scale up project results. (Project Document, Section II.V. Sustainability)
- Legislative and policy reforms advocated by the project could help create an enabling environment for scaling anti-corruption efforts. (Project Document, Section II.V. Sustainability)
- Multiple respondents across different stakeholder groups noted that the project benefits from strong government support and alignment with

national priorities, particularly in the area of anti-corruption. High-level government officials, including the Prime Minister's office, have reportedly demonstrated commitment and support for the project. This alignment reportedly serves as a key enabler for scaling up project activities. Moreover, the positive feedback and expressed demand from key stakeholders, such as the judiciary, reportedly indicate a strong buy-in for specific components, which is key for ensuring the successful expansion of project activities.

Barriers to Scaling

Challenges to scaling include political dynamics, weak institutional capacity, security concerns, limited funding diversity, and gender inequity in participation.

Evidence:
- The complex political economy and vested interests that enable corruption in Iraq could limit political will to expand anti-corruption measures, even if specific project activities are successful. (Project Document, Section I. Development Challenge)
- Weak institutional capacity, limited resources, and lack of coordination between institutions are constraints to scaling that are not fully addressed in the project strategy. (Project Document, Section I. Development Challenge)
- Volatile security conditions and political instability could make it difficult to expand activities, especially to new geographic areas. (Project Document, Annex II: Risk Log)

6.8. Cross-cutting Issues

6.8.1. Human Rights: To what extent have the poor, people with disabilities, women and other marginalized groups benefitted from implementation of the project?

Inclusivity of Project Benefits

The project aimed to benefit marginalized groups through anti-corruption efforts, but specific mechanisms for ensuring inclusion and measuring impact on these groups were limited.

Evidence:
- The project document notes that corruption disproportionately affects vulnerable populations and aims to reduce inequalities by promoting equitable access to justice. However, specific mechanisms for ensuring inclusion are not detailed. (Project Document, Section I. Development Challenge)
- Output 5 on increased transparency and public accountability includes activities to enhance citizens' access to information and enable civil society and media to report on corruption cases. This could potentially benefit marginalized groups by increasing their awareness and ability to demand accountability, but targeted outreach to these groups is not specified. (Project Document, Section III. Results and Partnerships, Output 5)
- Some interviewees mentioned that the project had a component focused on building the capacity of journalists and activists, including women, to report on corruption cases and create a network to support government anti-corruption efforts.
- Respondents noted that while the project aimed to include women, their participation was limited due to the low representation of women in the anti-corruption and judicial institutions the project worked with.

Poverty Reduction Effects

While the project's theory of change suggests potential poverty reduction impacts through improved governance, direct poverty alleviation was not a primary objective and these effects were not explicitly measured.

Evidence:
- The project's theory of change outlines that reducing corruption will contribute to more equitable economic development and poverty reduction, but these higher-level impacts are not directly measured. (Project Document, Section II. Theory of Change)
- The project's focus on improving the business environment through commercial dispute resolution under Output 3 could indirectly benefit poor populations by enabling job creation and economic growth, but direct poverty alleviation is not a primary objective. (Project Document, Section III. Results and Partnerships, Output 3)

Equity in Resource Distribution

The project aimed to enhance resource distribution indirectly by mitigating corruption but did not directly tackle the equitable allocation of resources or services.

Evidence:
- Analysis in the project document suggests that corruption enables inequitable distribution of public resources and capture by elites, with negative impacts on service delivery for the poor. However, the project's approach focuses primarily on reducing corruption rather than direct redistribution of resources. (Project Document, Section I. Development Challenge)
- Anti-corruption activities under Output 1 and Output 2, such as capacity building for integrity institutions and the judiciary, are not explicitly

structured to ensure equitable geographic or demographic distribution of resources. (Project Document, Section III. Results and Partnerships)

Analysis

The project's approach to benefiting marginalized groups, including the poor, people with disabilities, women, and other vulnerable populations, is largely indirect and embedded within its broader anti-corruption objectives.

The project's efforts to increase transparency and public accountability, particularly through enhancing citizens' access to information and empowering civil society and media, have the potential to benefit marginalized groups by increasing their awareness and ability to demand accountability. However, targeted outreach to these groups is not explicitly outlined.

Some initiatives, such as capacity building for journalists and activists, including women, to report on corruption cases, show a more direct attempt to involve marginalized groups. However, challenges persist, particularly in achieving balanced gender representation due to structural issues in partner institutions.

The project's theory of change suggests potential poverty reduction impacts through improved governance and a better business environment. However, these higher-level impacts are not directly measured, and poverty alleviation is not a primary objective.

6.8.2. Gender Equality: To what extent has gender been addressed in the design, implementation and monitoring the different interventions? To what extent has project support promoted positive changes in gender equality? Were there any unintended effects? Is the gender marker assigned to this project representative of reality?

Gender Mainstreaming in Project Design

Gender equality was integrated as a cross-cutting element in the project design.

Evidence:
- The project document states that "The project will integrate gender equality, human rights principles and civil society engagement as cross-cutting elements." (Project Document, Section II: Project Strategy)
- The project has a gender marker of 2, indicating gender equality is not the main objective but the project promotes it in a consistent way. (Project Document, Project Summary Sheet)

Gender-Responsive Implementation

The project made efforts to ensure women's participation in activities and organized some women-specific events, though challenges in achieving gender balance persisted.

Evidence:
- The project ensures participation of women in activities. For example, in 2022, 96 out of 434 officials (22%) trained on legislative drafting, international standards, anti-corruption strategies and assessments were women. (2022 Annual Report, Output 1 progress)
- Workshops were organized specifically for women, such as the workshop on New York Convention for the Women Judges Association in 2022. (2022 Annual Report, Activity 2.5)
- Some interviewees mentioned that a recent analysis by the EU delegation found low participation of women in capacity building trainings and low gender representation in the institutions the project works with. UNDP is reportedly now working on a plan to address these issues, such as trying to bring more women beneficiaries into trainings.
- Respondents noted that the project included a special session on women's empowerment in the field of investigative journalism.

Gender-Sensitive Monitoring

Gender-disaggregated data was collected for relevant indicators, allowing for some tracking of gender-related outcomes.

Evidence:
- Project indicators are disaggregated by gender where relevant, such as number of officials trained. (Project Document, Results Framework)
- The 2022 Annual Report provides gender-disaggregated data on training participants. (2022 Annual Report, Output 1 and 2 progress)

Accuracy of Gender Marker Assignment

The assigned Gender Marker of 2 is representative of its approach and reported results in promoting gender equality.

Evidence:
- The project was assigned a Gender Marker of 2 (GEN2) at the design stage, signifying that while gender equality is not the primary objective, the project aims to consistently promote it. (Project Document, Project Summary Sheet)
- The project's approach and reported results align with the GEN2 marker criteria outlined in the UNDP Gender Marker guidelines:
  o The project demonstrates efforts to promote gender equality in its implementation, such as ensuring women's participation in training activities and organizing targeted workshops for women judges. (2022 Annual Report, Output 1 and 2 progress)
  o Gender-disaggregated indicators are used to track and measure changes related to gender equality, such as the number of male and female training participants. (Project Document, Results Framework; 2022 Annual Report)

Analysis

The project has made conscious efforts to address gender equality, though with varying degrees of success across different aspects of its implementation. The project design incorporated gender equality as a cross-cutting element, earning a gender marker of 2, which accurately reflects its intent and approach.

In implementation, the project has taken steps to ensure women's participation in activities and organized some women-specific events. This is evidenced by the inclusion of women in training programs and workshops tailored for women judges. However, challenges in achieving gender balance persist, with recent analysis indicating low participation of women in some capacity-building trainings and limited gender representation in partner institutions.

The project's monitoring efforts demonstrate a commitment to gender-sensitive data collection, with gender-disaggregated indicators allowing for tracking of women's participation. This approach has enabled the project team to identify and address gender imbalances in participation.

6.8.3. Women Empowerment: To what extent has the project contributed to women's empowerment?

Decision-Making Participation

The project aimed to promote women's participation in decision-making processes, aligning with broader UN development goals.

Evidence:
- The project aimed to promote women's participation in decision-making processes, as stated in the project's alignment with UNSDCF Outcome

(2020-2024), which focuses on "advocating for women's leadership in decision-making processes." (Project Document, Results Framework)

Skill Development and Capacity Building

The project provided various training opportunities for women, contributing to skill development in the judiciary and anti-corruption sectors.

Evidence:
- The project has provided training opportunities for women in various capacities:
  o In 2022, 96 out of 434 officials (22%) trained on legislative drafting, international standards, anti-corruption strategies, and assessments were women. (2022 Annual Report, Output 1 progress)
  o A workshop on the New York Convention was organized specifically for the Women Judges Association in 2022. (2022 Annual Report, Activity 2.5)
- These training activities contribute to skill development and capacity building for women in the judiciary and anti-corruption sectors.
- Multiple interviewees across different stakeholder groups mentioned that the project provided training to women journalists and activists on investigating and reporting corruption cases.
- Some respondents noted that women were part of a network of activists and journalists formed after the project training to collaboratively work on anti-corruption issues.

Analysis

The project has made notable efforts towards women's empowerment, primarily through skill development and capacity building initiatives. Training programs in the judiciary and anti-corruption sectors have provided women with valuable opportunities to enhance their competencies, potentially positioning them for greater influence in their fields. However, the project's impact on increasing women's participation in decision-making processes is a work in progress, with room for further development.

While the project's anti-corruption efforts may indirectly contribute to addressing systemic inequalities, challenges persist in overcoming entrenched social and cultural barriers. The relatively low representation of women in key institutions remains an ongoing issue that the project continues to operate.

6.8.4. Capacity Building: Did the project adequately invest in, and focus on, national capacity development to ensure sustainability and promote efficiency. Are the knowledge products (reports, studies, etc.) delivered by the project utilized by the country?

Investment in National Capacity Development

The project invested in capacity building for various stakeholders in Iraq's anti-corruption and justice sectors.

Evidence:
- The project has invested in capacity building for various stakeholders in Iraq, including:
  o Training for judges, prosecutors, and CoI officials on investigation and adjudication subjects (Project Document, Output 2; 2022 Annual Report, Activity 2.2)
  o Workshops and training on legislative drafting, international standards, anti-corruption strategies, and assessments for public officials (2022 Annual Report, Output 1 progress)

- o Training on Codes of Conduct for judges and prosecutors (2023 Progress Report, Activity 2.6)
  - o Training on corruption risk assessments for public officials (2023 Progress Report, Activity 1.4)
- The project also supported the development of institutional capacity, such as:
  - o Assisting the KRI Commission of Integrity in launching a special hotline to receive corruption complaints (2022 Annual Report, Activity 5.4)
  - o Supporting the establishment of digital forensics laboratories at the Federal and KRI Commissions of Integrity (2023 Progress Report, Activity 2.2)
- Interviewees mentioned that the project provided training and capacity building support to Iraqi professionals in the justice sector and to lawyers on anti-corruption investigation and prosecution. Over 400 professionals were reportedly trained.
- Some respondents noted that the project is working with the Judicial Institute and the Anti-Corruption Academy to transfer curricula and conduct trainings to ensure sustainability.
- Interviewees mentioned that one reoccurring recommendation from various beneficiaries was for the project to work more with Iraqi experts and trainers, rather than relying solely on international experts, to build local capacity.

Knowledge Transfer Effectiveness

The project facilitated knowledge transfer through training activities, workshops, and mentoring initiatives, with some evidence of practical application.

Evidence:
- The project has facilitated knowledge transfer through various training activities, workshops, and mentoring initiatives:
  - o Workshops on the New York Convention for judges and lawyers (2023 Progress Report, Output 3.3)
  - o Training on arbitration and mediation for judges, public servants, arbitrators, and mediators (Project Document, Output 3.3)
  - o Mentoring of CoI investigators on diversifying investigative techniques (Project Document, Activity 2.3; 2023 Progress Report, Activity 2.3)
- The project also developed knowledge products, such as:
  - o A review of Iraq's anti-corruption legal framework (2022 Annual Report, Output 1)
  - o A review of the draft Asset Recovery Law and Public Procurement Law (2023 Progress Report, Activity 1.1)
- Some respondents noted that training participants reported increased knowledge and skills in anti-corruption investigation and asset recovery. Some reportedly noted improved understanding of international anti-corruption mechanisms.
- Interviewees mentioned that after participating in project trainings, some journalists and activists formed a network to collaboratively investigate corruption cases, suggesting they are applying the knowledge gained.

Sustainability of Capacity-Building Efforts

Efforts were made to ensure sustainability of capacity building, though challenges remain in securing long-term government commitment and resources.

Evidence:
- The project aimed to ensure sustainability by:
  - o Involving the Judicial Institutes and CoI trainers in developing and delivering training on Codes of Conduct (Project Document, Activity 2.6)

- o Collaborating with universities to introduce arbitration and mediation into academic curricula (Project Document, Activity 3.3.5; 2023 Progress Report, Output 3.3)
- o Establishing digital forensics laboratories within the Commissions of Integrity for long-term capacity development (2023 Progress Report, Activity 2.2)
- Some respondents noted that the project is working on an exit strategy to transfer responsibilities to national partners. This reportedly includes training of trainers efforts with the Judicial Institute and Anti-Corruption Academy.
- Interviewees mentioned that sustainability depends on continued government commitment and allocation of resources to anti-corruption efforts. Political will is reportedly a key factor.

Analysis

The project has implemented a wide range of capacity-building initiatives, targeting key stakeholders in Iraq's anti-corruption and justice sectors. These include training programs for judges, prosecutors, CoI officials, and public servants on various aspects of anti-corruption work. The project has also supported institutional capacity development, such as establishing digital forensics laboratories and launching a corruption complaint hotline.

Knowledge transfer is effective in many areas, with participants reporting increased skills and understanding. The formation of a journalist and activist network to investigate corruption cases demonstrates practical application of the knowledge gained. However, there is a reoccurring recommendation from beneficiaries to increase the involvement of Iraqi experts in training delivery, which could enhance local ownership and sustainability.

Sustainability efforts are evident in the project's approach, particularly in collaborating with local institutions like the Judicial Institute and Anti-Corruption Academy to transfer curricula and conduct trainings. However, long-term sustainability remains a challenge. The effectiveness of these capacity-building efforts ultimately depends on continued government commitment and allocation of resources to anti-corruption initiatives.

7. CONCLUSIONS

Relevance
The ACAI project demonstrates strong relevance to Iraq's national priorities and the global development agenda. The project's objectives and activities align closely with the government's anti-corruption efforts, as evidenced by the signed Memorandum of Understanding between the Prime Minister's Office and UNDP. The project's involvement in reviewing and drafting key anti-corruption laws, such as the Access to Information Law and Public Procurement Law, addresses national priorities and strengthens the anti-corruption legal framework.

The project demonstrates high relevance to beneficiary needs across key areas of Iraq's anti-corruption landscape. Its focus on addressing legislative and strategic gaps, particularly in aligning with UNCAC standards and supporting strategy implementation, responds to needs in the legal and policy framework. The extensive capacity building initiatives across diverse stakeholder groups, including public officials, justice sector professionals, and civil society actors, address skill deficits.

The project has demonstrated agility in recognizing and responding to urgent and emerging priorities beyond its original scope. This adaptability is evident from the inception phase, where strategic modifications were formalized through a project document amendment. Throughout its course, the project skillfully incorporated new stakeholders and expanded its focus to align with evolving national priorities, exemplified by the engagement of the National Investment Commission and the broadened legislative review.

Coherence
The ACAI project has demonstrated a sound approach to complementing work among different entities, effectively engaging with development partners, civil society organizations, government institutions, and academic bodies. The project's coordination with development partners is particularly strong, evidenced by the establishment of the bi-monthly Anti-Corruption Coordination Forum (ACCF). Engagement with civil society has been active and substantive, focusing on capacity building for activists and journalists in investigative reporting on corruption.

The project has increased synergies with other projects within UNDP and across various agencies, demonstrating a strategic approach to leveraging resources and expertise for enhanced impact in anti-corruption efforts. Within UNDP, ACAI has actively collaborated with multiple initiatives, facilitating knowledge sharing and resource optimization across different areas of anti-corruption work. Externally, ACAI has established strong synergies with other UN agencies and international organizations, demonstrating a coordinated approach to leveraging specialized expertise.

The project's theory of change has demonstrated resilience and adaptability in the face of Iraq's volatile political landscape. Despite challenges to some assumptions, the project's ability to adapt strategies, engage new stakeholders, and maintain progress towards its objectives in a volatile environment underscores the resilience and continued relevance of its underlying theory of change.

The project operates within a complex environment where both supporting and undermining factors influence its effectiveness and impact. Supporting factors bolster the project's relevance and potential for success, such as alignment with national anti-corruption strategies and Iraq's international commitments. Collaborative efforts with other projects and international agencies have created valuable synergies, optimizing resources and expanding the project's reach. However, the project also faces challenges that potentially undermine its

effectiveness, particularly political instability and resistance to reform within government institutions.

The project demonstrates a strategic approach to stakeholder involvement throughout its lifecycle. From the design phase through implementation, the project has consistently engaged a diverse range of stakeholders, including government institutions, civil society organizations, and international partners. This approach to stakeholder engagement has contributed to the project's relevance, effectiveness, and potential for sustainability.

Efficiency

The project demonstrates mixed progress towards achieving its targeted outputs, with some areas showing advancement while others lag behind. Outputs 1 and 2, focusing on improving the legislative framework and equipping the justice sector to handle corruption cases, show strong progress. Output 3, aimed at enhancing commercial dispute resolution, presents a more varied picture, with slower progress on legislative drafting and organizing workshops. Outputs 4 and 5, focused on parliamentary support for anti-corruption reforms and increasing transparency, show the most delays.

The project has demonstrated a strong commitment to efficiency and cost-effectiveness in its implementation strategy and execution. Key efficiency measures include leveraging existing UNDP Iraq operational support, partnering with ongoing projects, utilizing consolidated support teams, and strategically employing international expertise where needed. Cost-effectiveness has been achieved through competitive procurement processes, use of pre-vetted expert rosters, strategic planning for consolidated procurement actions, and a focus on sustainable outcomes such as skills development and institutional capacity building.

The project has faced delays in achieving some performance indicators, primarily due to Iraq's volatile political situation, the suspension of the Kurdistan Regional Government Parliament, demands exceeding the project's scope, and internal challenges such as key personnel leaves. To address these issues, the project has implemented several corrective measures, including rescheduling activities with time buffers, maintaining close government coordination, synchronizing efforts with other international partners, and leveraging internal UNDP expertise to cover specialized gaps.

The project demonstrates effective resource allocation in both human and financial aspects. Human resources were adequately secured, with a well-structured staffing plan including a dedicated Project Management Unit and Technical Assistance Team. Financial resources were carefully allocated and managed, with the project reported to be on track with its objectives and efficiently utilizing allocated resources. The assessment conducted during the inception period to revise activities and budget requirements based on stakeholder consultations indicates a proactive approach to ensuring efficient financial resource allocation.

The project has implemented a monitoring mechanism that effectively tracks progress and informs decision-making. The monitoring system's effectiveness is further enhanced by its integration with UNDP's corporate quality assurance processes and its alignment with donor reporting requirements. The project demonstrates a strong commitment to evidence-based management, utilizing its monitoring system to track progress, identify challenges, and inform strategic decisions throughout the project lifecycle.

Effectiveness

The project's outputs demonstrate a high degree of clarity, feasibility, and realism, although they are ambitious in nature. The outputs are clearly articulated in the Project Document, with each of the five key areas well-defined and supported by detailed problem analysis and context. Feasibility is supported by the project's implementation strategy, including

partnerships, phased workplans, and allocated resources. The project demonstrates realism by acknowledging the ambitious nature of its goals while recognizing potential challenges in the operating environment.

The project demonstrates a high degree of appropriateness and relevance in its logic, concept, and approach to achieving its targets and objectives. The project's logic exhibits strong coherence, with a clear theory of change linking problem analysis to outputs and outcomes and aligning well with broader country program goals. The project concept shows strong alignment with anti-corruption objectives, with the majority of outputs directly addressing corruption issues. The multi-stakeholder, capacity-building approach adopted by the project is particularly suitable for addressing corruption from multiple angles and sustainably strengthening anti-corruption systems.

The project has demonstrated adaptability in surmounting challenges through alternative pathways. Key examples include realigning activities based on early implementation lessons, adapting staffing strategies to maintain continuity despite personnel changes, and pivoting engagement strategies in response to political instability. This flexibility has been present in maintaining project momentum in a complex operating environment.

The project has effectively mainstreamed UN programming principles throughout its lifecycle, demonstrating integration of these core values. Leaving No One Behind and Gender Equality and Women's Empowerment are emphasized through targeted efforts to increase women's participation in project activities, with gender-disaggregated monitoring indicators tracking progress. Human Rights principles are integrated notably in the trial monitoring program, implemented in collaboration with UNAMI's human rights office, promoting rule of law and justice. Sustainability and Resilience are prioritized through capacity development initiatives and durable institutional changes. Accountability is ensured through governance structures, including a multi-stakeholder Project Steering Committee and adherence to UNDP's Social and Environmental Standards.

The project has demonstrated a strong ability to form and maintain partnerships with various development actors, leveraging these relationships to enhance project results. With bilateral and multilateral organizations, the project has established effective coordination mechanisms, particularly through the Anti-Corruption Coordination Forum. Engagement with civil society organizations has been significant, focusing on capacity building and reporting initiatives. In the academic sphere, the project established partnerships to integrate anti-corruption and dispute resolution into university curricula.

The project's success in achieving desired results can be attributed to several key factors, with external elements also playing an important role in shaping implementation. Key success factors include stakeholder empowerment and trust-building, technical expertise and peer learning, strong partnerships and coordination, and a skilled project team supported by high-level stakeholders. Government ownership has been a major positive external factor, with the new government's prioritization of anti-corruption efforts creating an enabling environment for the project. Security constraints, while identified as a potential high-impact risk, have been managed effectively thus far.

Impact
The program intervention demonstrates strong potential to contribute to longer-term outcomes and results across several key areas. In strengthening the anti-corruption framework, the project has made significant contributions by aligning Iraq's legislation with international standards and supporting the development of implementation plans and oversight mechanisms for anti-corruption strategies at both federal and regional levels. The project's efforts to enhance the capacity and integrity of the justice sector show promise for long-term

impact through the establishment of a Trial Monitoring, specialized training for judges and prosecutors, and the development of codes of conduct aligned with international standards.

In promoting commercial dispute resolution and economic development, the project's work on modernizing the legal framework for commercial arbitration and enhancing dispute resolution capacities contributes to creating a more favorable business environment. The establishment of a new commercial court in KRI and Iraq's signing of the Singapore Convention on Mediation are steps towards attracting private sector development and investment, which could have long-term economic benefits.

The project's intervention has had an impact on target institutions and direct beneficiaries, though the extent of this impact varies across different areas. The approval of the Access to Information law and improvements to the Public Procurement law are notable achievements in terms of legislative and strategic framework. The capacity building of the justice sector shows substantial positive impact, with the tripling of investigations related to illicit enrichment and the successful prosecution of high-profile cases demonstrating meaningful improvements in the sector's capabilities.

In commercial dispute resolution, the project has catalyzed important steps towards modernizing Iraq's arbitration framework. Increased awareness and interest in alternative dispute resolution methods among key stakeholders suggest a positive trajectory. The project's impact on civil society engagement has been particularly strong, with the formation of an informal collaborative network by trained civil society members and journalists for continued anti-corruption investigative reporting demonstrating sustained empowerment and initiative.

Sustainability

The project demonstrates strong potential for continued benefits after its conclusion, particularly in key areas such as legal and policy frameworks, institutional capacity, civil society engagement, education, commercial dispute resolution, and technological advancements in anti-corruption efforts. Legislative improvements and enhanced capacities within judicial and integrity institutions through training and the adoption of codes of conduct are expected to have lasting impacts. The establishment of civil society networks and collaborations with educational institutions should contribute to sustained anti-corruption advocacy and awareness.

The project demonstrates strong capacity to sustain its operations in terms of both financial and programmatic implementation, though there are some potential challenges for long-term sustainability. Financially, the project is well-positioned for its current implementation phase, with secure funding until April 2025 and effective financial management practices. However, the reliance on a single donor poses a potential risk for long-term financial sustainability. Programmatically, the project demonstrates capacity for sustained operations, leveraging UNDP's long-standing presence in Iraq, extensive experience in governance projects, and established partnerships.

UNDP has established systems and processes to deliver quality services to partners, with several strengths contributing to sustainability. Results-based management and accountability mechanisms are well-developed, utilizing results frameworks, independent oversight, and regular reporting. Adaptive management and flexibility are key strengths, with the project demonstrating adaptability in revising designs and adjusting implementation strategies in response to challenges. UNDP's strong partnerships and coordination efforts contribute to sustainable service delivery, fostering a collaborative ecosystem for anti-corruption efforts. Quality assurance and oversight mechanisms ensure ongoing quality control and strategic

alignment of project activities. The project's focus on capacity building and knowledge management supports sustainable service delivery.

The implementation of the project offers several valuable lessons related to sustainability. Resilience and adaptability are essential for long-term success, with the project demonstrating effective navigation of political instability, security concerns, and pandemic-related restrictions. Flexibility in project design and implementation is essential for maintaining relevance and effectiveness, with the project's willingness to adjust outputs and activities based on emerging needs and country context. Close stakeholder engagement and consultative approaches enhance ownership and sustainability. Effective resource management, including leveraging partnerships, consolidating operations, and maintaining flexible budget management, is key to sustainable project execution.

The national partners' resources, motivation, and ability to continue implementing the project until its end present a mixed picture, with strong motivation but potential challenges in resources and long-term ability. Motivation among national partners is a strong point, with both federal and regional governments prioritizing anti-corruption efforts. However, resources remain an issue, with the project's integration into existing government structures providing a foundation for sustainability, but concrete resource allocations remaining limited. In terms of ability, the project has enhanced the capacity of national partners, particularly in the justice sector, but uncertainties persist about the ability to maintain momentum without continued external support.

The likelihood of sustainable project results varies across different dimensions of sustainability. In terms of systems, the project has made notable efforts to establish new organizational cultures, procedures, and frameworks that have the potential for lasting systemic change. Institutionally, there are positive indicators for sustainability, with strong ownership and commitment among key institutions and the focus on training trainers and embedding new integrity standards. However, financing presents an obstacle, with reliance on external funding and limited concrete financial commitments from the government. The anticipated impact of it is substantial, particularly in strengthening legal frameworks, building institutional capacity, and improving commercial dispute resolution, but the sustainability of these impacts may be affected by political instability, shifting government priorities, and ongoing resource constraints.

The project demonstrates a thoughtful approach to sustainability in its design, incorporating several elements aimed at ensuring long-term impact. Each output has been designed with sustainability considerations, from embedding costs in government budgets to building transferable skills and fostering a culture of accountability. However, the project's design for sustainability is not without limitations, most notably the lack of an exit strategy in the project document. The project's substantial reliance on international expertise, rather than local capacity, is another area that may need attention.

Scalability and Replicability

The project demonstrates potential for scalability across several components, with trial monitoring and arbitration showing the highest likelihood for expansion. Legislative reforms and capacity building initiatives also present strong opportunities for scaling due to their alignment with government priorities and their ability to address needs in the Iraqi context. Key factors supporting scalability include strong government buy-in, close collaboration with Iraqi counterparts fostering local ownership, development of transferable skills, and improved relationships between key stakeholders.

The potential for the project or its components to be scaled or replicated by relevant government ministries is promising, though some obstacles remain to be addressed. There is

strong evidence of government interest and buy-in for the project's objectives, particularly in anti-corruption efforts. The project's components, especially trial monitoring, arbitration, legislative reforms, and capacity building, align well with national priorities and have garnered enthusiasm from key stakeholders. However, the government's institutional capacity to scale and replicate project components varies across different ministries. Resource availability also presents a potential obstacle, with competing priorities and budgetary constraints potentially influencing the allocation of adequate resources to support the expansion of activities.

Cross-Cutting Issues

The project's strategy for benefiting marginalized groups, such as the poor, people with disabilities, women, and other vulnerable populations, is primarily indirect and integrated into its broader anti-corruption objectives. While the project recognizes that corruption disproportionately affects these groups, specific mechanisms for ensuring their inclusion or measuring direct impacts on them are limited. The project's efforts to increase transparency and public accountability have the potential to benefit marginalized groups by increasing their awareness and ability to demand accountability, but targeted outreach to these groups is not explicitly outlined.

The project has made conscious efforts to address gender equality, though with varying degrees of success across different aspects of its implementation. The project design included gender equality as a cross-cutting element, resulting in a gender marker of 2, which aptly reflects its intent and approach. In implementation, the project has taken steps to ensure women's participation in activities and organized some women-specific events. However, difficulties in achieving gender balance persist, with recent analysis indicating low participation of women in some capacity-building trainings and limited gender representation in partner institutions.

The project has made notable efforts towards women's empowerment, primarily through skill development and capacity building initiatives. Training programs in the judiciary and anti-corruption sectors have provided women with opportunities to enhance their competencies, potentially positioning them for greater influence in their fields. However, the project's impact on enhancing women's participation in decision-making processes remains a work in progress. While the project's anti-corruption efforts may indirectly contribute to addressing systemic inequalities, difficulties persist in overcoming entrenched social and cultural barriers.

The project has made significant investments in national capacity development, with a focus on sustainability and efficiency. The project has implemented a wide range of capacity-building initiatives, targeting key stakeholders in Iraq's anti-corruption and justice sectors. Knowledge transfer has proven effective in many areas, with participants reporting increased skills. Sustainability efforts are evident in the project's approach, particularly in collaborating with local institutions like the Judicial Institute and Anti-Corruption Academy to transfer curricula and conduct trainings. However, long-term sustainability remains an issue, with the effectiveness of these capacity-building efforts ultimately depending on continued government commitment and allocation of resources to anti-corruption initiatives.

8. RECOMMENDATIONS

Recommendation 1: Enhance strategic engagement with the Federal Parliament and the Kurdistan Region of Iraq (KRI) Parliament to accelerate adoption of anti-corruption legislation

Project Aspect in Need of Solution:
The evaluation findings highlight that despite the project's progress in reviewing and drafting key anti-corruption laws, the adoption process remains slow due to limited engagement with both the Federal Parliament and the KRI Parliament. This has impeded the project's ability to fully achieve its intended outcomes related to strengthening the legislative framework for anti-corruption in Iraq.

Recommended Actions:
1.1. Develop targeted engagement strategies for the Federal Parliament and KRI Parliament: The project team should create tailored plans to enhance collaboration with parliamentarians in both the federal and regional contexts, identifying key stakeholders, communication channels, and advocacy opportunities.
1.2. Leverage high-level support: Engage high-level government officials and donors to build political will for accelerated adoption of anti-corruption legislation at both the federal and regional levels.
1.3. Facilitate multi-stakeholder dialogues: Organize inclusive discussions involving the Federal Parliament, KRI Parliament, government agencies, civil society, and international partners to build consensus and momentum for legislative reforms.

Beneficiaries/Audience:
- Project Team: Responsible for designing and implementing the enhanced parliamentary engagement strategies.
- Federal Parliament and KRI Parliament: The primary targets of the engagement strategies, with the aim of accelerating the adoption of anti-corruption legislation at both the federal and regional levels.

Priority Level: High

Responsibility for Implementation:
- Project Team: Lead the development and implementation of the parliamentary engagement strategies.
- Federal Parliament and KRI Parliament: Engage constructively with the project team and demonstrate political will for adopting anti-corruption legislation.
- Donor: Provide political support for the engagement efforts.

Implementation Timeframe:
To be initiated immediately and implemented over the next 6-12 months, given its high priority and the need to accelerate legislative adoption.

Thematic Area: Programmatic

Gender and Social Inclusion:
Ensure that the parliamentary engagement strategies are gender-responsive and inclusive, considering the participation and perspectives of women parliamentarians and marginalized groups in the legislative process at both the federal and regional levels.

Recommendation 2: Develop an exit strategy to ensure sustainability of project outcomes

Project Aspect in Need of Solution:
The evaluation notes the absence of an exit strategy in the project document, which could hinder smooth transition and handover of project activities to local stakeholders (Finding 6.6.8). This lack of a clear exit strategy may impact the project's ability to ensure the sustainability of its outcomes and long-term impact.

Recommended Actions:
2.1. Conduct a sustainability assessment: The project team should assess the current status of project activities, identifying areas where local ownership and capacity have been built and areas that require further attention.
2.2. Engage key stakeholders in exit strategy development: Involve key Iraqi institutions, such as the Federal and KRI Commissions of Integrity, the judiciary, and local training institutes, in the process of developing the exit strategy to ensure their buy-in and commitment.
2.3. Develop a phased handover plan: Create a detailed plan for gradually transferring responsibilities, resources, and ownership of project activities to local partners, setting clear milestones and timelines.
2.4. Integrate capacity building into the exit strategy: Prioritize the institutionalization of training curricula and resources within local judicial and anti-corruption training institutes to ensure the long-term sustainability of capacity building efforts.

Beneficiaries/Audience:
- Project Team: Responsible for developing and implementing the exit strategy.
- Partners (Federal and KRI Commissions of Integrity, Judiciary, Training Institutes): Actively participate in the development of the exit strategy and commit to taking ownership of project activities.

Priority Level: High

Responsibility for Implementation:
- Project Team: Lead the development and implementation of the exit strategy.
- Partners: Actively participate in the development of the exit strategy and commit to taking ownership of project activities.

Implementation Timeframe:
To be developed within the next 3-6 months, with implementation phased over the remaining project duration.

Thematic Area: Sustainability

Gender and Social Inclusion:
Ensure that the exit strategy considers the long-term sustainability of efforts to promote gender equality and social inclusion, including the continued engagement of women and marginalized groups in anti-corruption efforts beyond the project's lifetime.

Recommendation 3: Increase the involvement of Iraqi experts and trainers in capacity building activities

Project Aspect in Need of Solution:
Evaluation findings indicate that some beneficiaries recommend increasing the involvement of Iraqi experts and trainers in capacity building activities, rather than relying solely on international expertise. This reliance on international experts may limit the local ownership and sustainability of capacity building efforts.

Recommended Actions:
3.1. Conduct a mapping exercise: Identify and assess the capacity of qualified Iraqi experts and trainers in the fields of anti-corruption, judiciary, and commercial dispute resolution.
3.2. Develop a local expert engagement plan: Create a plan to involve Iraqi experts in the design, development, and delivery of capacity building activities, setting targets for their participation.
3.3. Establish a mentorship program: Pair international experts with Iraqi counterparts to facilitate knowledge transfer and build the capacity of local trainers.

Beneficiaries/Audience:
- Project Team: Responsible for identifying and engaging Iraqi experts and trainers in capacity building activities.
- Iraqi Experts and Trainers: Benefit from increased opportunities to contribute to the design and delivery of capacity building programs, enhancing their skills and expertise.
- Implementing Partners: Collaborate with the project team to identify and involve Iraqi experts in capacity building efforts.

Priority Level: Medium

Responsibility for Implementation:
- Project Team: Lead the identification and engagement of Iraqi experts and trainers in capacity building activities.
- Implementing Partners: Support the project team in identifying and involving Iraqi experts in capacity building efforts.

Implementation Timeframe:
To be initiated within 3 months and implemented over 6-12 months.

Thematic Area: Programmatic, Sustainability

Gender and Social Inclusion:
Ensure that the engagement of Iraqi experts and trainers is gender-balanced and inclusive, actively seeking the participation of women and experts from marginalized groups in the design and delivery of capacity building programs.

Recommendation 4: Diversify funding sources to mitigate risks to long-term financial sustainability

Project Aspect in Need of Solution:
The evaluation notes that the project's reliance on a single donor (EU) poses a potential risk to long-term financial sustainability. This dependency on a sole funding source may limit the project's ability to scale up and sustain its activities beyond the current funding cycle.

Recommended Actions:
4.1. Develop a resource mobilization strategy: The project team should create a strategy for diversifying funding sources, identifying potential international donors, national government agencies, and private sector partners.
4.2. Engage with other international donors: Actively reach out to other international donors with aligned priorities, presenting the project's achievements and potential for impact to secure additional funding.
4.3. Advocate for government co-financing: Work with key government partners to advocate for the allocation of national budget resources to support the continuation and scaling up of project activities.

Beneficiaries/Audience:
- Project Team: Responsible for developing and implementing the resource mobilization strategy.
- UNDP: Supports the project team in identifying and engaging with potential donors and partners.
- Government Partners: Collaborate with the project team to advocate for the allocation of national budget resources to support the project's sustainability.

Priority Level: Medium

Responsibility for Implementation:
- Project Team: Lead the development and implementation of the resource mobilization strategy.
- UNDP: Support the project team in identifying and engaging with potential donors and partners.

Implementation Timeframe:
Strategy development to begin within 3 months, with ongoing implementation throughout the project lifetime.

Thematic Area: Operational, Sustainability

Gender and Social Inclusion:
Ensure that the resource mobilization strategy considers the importance of securing funding for initiatives that specifically target gender equality, women's empowerment, and the inclusion of marginalized groups in anti-corruption efforts.

9. LESSONS LEARNED

Lesson 1: Adaptive management is important for handling complex political landscapes and ensuring project relevance

Evidence:
- The project demonstrated agility in recognizing and responding to urgent and emerging priorities beyond its original scope, exemplified by the engagement of the National Investment Commission and the broadened legislative review.
- The project's ability to adapt strategies, engage new stakeholders, and maintain progress towards its objectives in a volatile environment underscores the resilience and continued relevance of its underlying theory of change.

Lesson 2: Stakeholder engagement and coordination mechanisms enhance project effectiveness and sustainability

Evidence:
- The project's collaborative approach to stakeholder engagement, consistently engaging diverse stakeholders from the design phase through implementation, has contributed to its relevance, effectiveness, and potential for sustainability.
- The establishment of the bi-monthly Anti-Corruption Coordination Forum (ACCF) has brought together a diverse range of international partners, fostering harmonization of anti-corruption efforts.

Lesson 3: Monitoring systems enable evidence-based decision-making and adaptive management

Evidence:
- The project's monitoring mechanism effectively tracks progress and informs decision-making, contributing to its ability to stay on track with objectives and utilize resources effectively.
- The project actively uses monitoring data for adaptive management and decision-making, as evidenced by timely signaling of slow progress to stakeholders, active risk management, application of lessons learned, and course corrections based on performance data.

Lesson 4: Diversifying funding sources and securing government buy-in are essential for long-term financial sustainability

Evidence:
- The project's reliance on a single donor (EU) for funding is a potential risk for long-term financial sustainability.
- Motivation among national partners is a strong point, with both federal and regional governments prioritizing anti-corruption efforts. However, concrete resource allocations from the government remain limited.

10. GOOD PRACTICES

Good Practice 1: Establishing a Multi-Stakeholder Anti-Corruption Coordination Forum

Description:
The ACAI project established a bi-monthly Anti-Corruption Coordination Forum (ACCF) to harmonize anti-corruption efforts among international partners. The forum, co-chaired by the EU Delegation to Iraq and UNDP, brought together a diverse range of stakeholders, including EUAM, NMI, US Embassy, UK Embassy, UNODC, UNAMI OHCHR, GIZ, Transparency International, and the World Bank. The ACCF provided a platform for discussing federal and KRI's anti-corruption policies, strategies, efforts, and required support through different interventions.

Success Factors:
- Inclusive and diverse stakeholder engagement
- Regular and structured coordination mechanism
- High-level leadership and co-chairing by EU Delegation and UNDP
- Focus on harmonizing efforts and building synergies

Evidence of Effectiveness:
- Five ACCF meetings were held in the first year and two more in the second year, demonstrating sustained coordination efforts (1st and 2nd Annual Progress Reports, Output 1.6).
- The ACCF provided a space for international actors to discuss ideas and build synergies for effective and efficient programming (ACAI Narrative Report January 2023 - 8 October 2023).

Scalability and Replicability:
The ACCF model can be replicated in other contexts where multiple international partners are engaged in anti-corruption efforts. Key prerequisites include identifying a lead agency to convene the forum, securing high-level buy-in from stakeholders, and establishing a clear mandate and structure for coordination.

Good Practice 2: Capacity Building for Investigative Journalism on Corruption

Description:
The ACAI project trained 26 civil society activists and journalists from across Iraq on investigative journalism and CSO investigative reporting. The six-month training program aimed to enable civil society and media to report responsibly on corruption cases. The training covered topics such as legal protection for investigative journalism, interviewing techniques, evidence-gathering, and maintaining source anonymity.

Success Factors:
- Targeted capacity building for civil society and media
- Practical training content
- Inclusion of participants from diverse regions

Evidence of Effectiveness:
- The trained cohort of activists and journalists evolved into a collaborative network, expected to be registered as an NGO, demonstrating sustained capacity and partnership. (ACAI Narrative Report January 2023 - 8 October 2023, Output 5.3).
- Participants reported increased knowledge and skills in investigating and reporting corruption cases (Group 2 interviews).

Scalability and Replicability:
The investigative journalism training model can be scaled up to include more participants and replicated in other contexts where media and civil society play an important role in anti-corruption efforts. Adaptation may be needed to align the training content with local legal frameworks and media landscapes.

Good Practice 3: Developing a Trial Monitoring Program

Description:
In collaboration with UNAMI, the ACAI project established a Trial Monitoring Program to observe and report on major corruption cases before the Anti-Corruption Courts in Iraq. The program aimed to promote the rule of law, justice, and human rights by supporting the judiciary and identifying areas for improvement in the handling of corruption cases. The project developed a sound methodology for monitoring, reporting, and providing recommendations to strengthen the integrity and effectiveness of the judicial process.

Success Factors:
- Strong partnership between UNDP and UNAMI
- Monitoring methodology and reporting framework
- Engagement and buy-in from the Iraqi judiciary
- Focus on promoting rule of law and human rights

Evidence of Effectiveness:
- 278 corruption cases (195 federal, 83 KRI) were monitored, significantly exceeding the end target of 150 total cases (ACAI Narrative Report January 2023 - 8 October 2023, Output 2.1).
- The first annual Trial Monitoring Report, covering August 2022 to April 2023, was completed, providing findings and recommendations to strengthen the judicial process (ACAI Narrative Report January 2023 - 8 October 2023, Output 2.1).

Scalability and Replicability:
The Trial Monitoring Program can be scaled up to cover more corruption cases and replicated in other contexts where strengthening the integrity and effectiveness of the judicial process is a priority. Key prerequisites include securing the cooperation of the judiciary, establishing a clear monitoring methodology, and ensuring the independence and credibility of the monitoring team.

Good Practice 4: Mainstreaming Anti-Corruption in Public Procurement

Description:
The ACAI project supported the Iraqi government in reviewing and improving the draft Public Procurement Law to enhance its ability to combat corruption and improve efficiency in public procurement processes. The project provided technical assistance and recommendations based on international best practices and engaged a multi-stakeholder task force to build consensus around the proposed reforms. The strengthened Public Procurement Law aims to protect public resources from fraud and corruption risks and promote transparency and accountability in government contracting.

Success Factors:
- Alignment with government priorities and national development goals
- Technical expertise and international best practices
- Focus on preventing corruption and improving efficiency

Evidence of Effectiveness:
- The Council of Ministers Secretariat adopted several of UNDP's recommendations to enhance the Public Procurement Law's ability to combat corruption and improve efficiency (ACAI Narrative Report January 2023 - 8 October 2023, Output 1.4).
- Proper implementation of the strengthened Public Procurement Law could protect billions of dollars from fraud and corruption risks (ACAI Narrative Report January 2023 - 8 October 2023, Output 1.4).

Scalability and Replicability:
Mainstreaming anti-corruption in public procurement can be replicated across different sectors and levels of government. The approach of providing technical assistance, engaging stakeholders, and aligning with international best practices can be adapted to specific country contexts and procurement frameworks.

11. ANNEXES

Annex 1. TOR of the Evaluation Assignment

**INDIVIDUAL INTERNATIONAL CONSULTANT PROCUREMENT NOTICE
MID-TERM PROJECT EVALUATION**

Project/Outcome Information	
Project title and Outcome title	Title: Support to justice initiatives curbing corruption and promoting commercial dispute resolution Intermediate/Project Outcome: Outcome 3.1- Strengthened institutions and systems deliver people-centered, evidence and needs-based equitable and inclusive gender and age-responsive services, especially for the most vulnerable populations, with particular focus on advocating for women's leadership in decision-making processes SDG Target: SDG 8 and 16
Atlas ID	00126945
Country	Iraq
Geographical coverage	Nationwide
Beneficiaries	The following but not limited to the: Supreme Judicial Council, Commission of Integrity (Federal and Kurdistan), Council of Representatives, Kurdistan Region Shora Council, Federal and regional Prime Minister's Offices, Parliament and Iraqi civil society organizations.
Date project document signed	29th April 2021
Project dates	**Start** **Planned end**
	30th April 2021 29th April 2025
Project budget (USD)	$17,611,500
Resources mobilized (as of 30th September 2023)	$17,611,500
Project delivery at the time of evaluation (as of 30th September 2023)	$6,896,336
Funding source	European Union
Implementing party	United Nations Development Programme

1. Programme Background

The "Support to Justice Initiatives Curbing Corruption and Promoting Commercial Dispute Resolution" is a multi-year project funded by the European Union (2021-2025). The project was designed against the backdrop of the complex socio-economic challenges faced by Iraq due to rampant corruption resulting in popular calls for action against corruption and the need for international investment in Iraq to provide support in taking substantive and sustainable steps to combat corruption and promote economic growth.

Through its different outputs, the project promotes anti-corruption entities' work, supports in accelerating corruption cases, promotes increased use of commercial arbitration and development of legislations on commercial dispute resolutions and the execution of arbitral awards in Iraq. It is also working to strengthen the capacity of specialized institutions adjudicating and investigating corruption offences and justice reforms in general by working in close collaboration with the Higher Judicial Council supporting the review and improvement of integrity and disciplinary mechanisms in the justice sector. The project

ensures the Parliament's buy-in on anti-corruption, integrity and investment reforms and promotes understanding of corruption work and integrity and transparency in parliament. The overall project design rests on the assumption that achieving the project's goal and objectives will require genuine political commitment from the highest levels of authorities and the judiciary in Iraq.

The overall objective is to build on Iraqi efforts to fight corruption in a sustainable manner and create a conducive environment for attracting foreign investments and private sector development.

The specific objectives are the following:

- Address legislative and strategic gaps in fighting corruption
- Improve capacity and integrity of public institutions investigating and adjudicating corruption offenses
- Improve capacity and legal framework to conduct commercial litigation
- Enable a climate of support in Parliament for fighting corruption and enhancing commercial litigation system
- Engage civil society, media and citizens in a constructive dialogue in the anti-corruption reform

Project Outputs and Activities

The project outputs and activities are aligned with the needs of the people of Iraq and the recovery and development priorities of the GoI, UNDP and the EU, focusing on promoting economic growth, strengthening integrity and the rule of law.

Project Outputs and Key Activities

1. Improved legislative and strategic framework for Anti-Corruption

Key activities under this component include but are not limited to the following:

- Draft or review domestic anti-corruption legislation in line with UNCAC and international standards
- Enhanced legislative drafting capacity and awareness of international standards embedded in revised or new legislation
- Support federal and KRI CoIs to develop implementation plans and oversight mechanisms to monitor the implementation of the Anti-Corruption Strategies
- Develop CoIs' capacity to conduct impact assessments of corruption legislation and corruption risk assessments
- Support the Federal and KRI governments to establish Joint Anti-Corruption High-Level Dialogue Forum
- Convene bi-monthly International Partners Anti-Corruption Coordination Forum

2. The justice sector lawyers and CoI are better equipped to process corruption offences due to (2.1.) improved technical skills relevant for corruption investigation prosecution adjudication and (2.2.) improved integrity rules of the justice sector

- Develop and run a trial monitoring programme in close cooperation with UNAMI Human Rights Office for all cases before the Central Anti-Corruption Court
- Conduct training and capacity building activities with focus on investigations for investigating judges, prosecutors and CoI investigators
- Provide mentors to CoI to deliver advice on diversifying investigative techniques
- Support the development of standard operating procedures (SOPs) for specific challenges arising out of corruption investigations and ensure public officials enforcing them are trained
- Support the federal and KRI judiciaries and CoIs in developing comprehensive codes of conduct
- Develop comprehensive training materials for TOTs and regular trainings on the concept of integrity for the Judiciaries and CoIs
- Develop a comprehensive SOP for ensuring a system of background checks and vetting upon entry into the service of the judiciary and promotion or assignment to specialized courts

- Strengthen ethics and integrity frameworks for independent lawyers registered to practice before a court of law and develop a training programme

3. Enhanced Legislations, Institutions, and Capacities for Commercial Dispute Resolutions
    - Enhanced access to ADR mechanisms through reformed legal framework compatible with domestic needs, best practices, and international conventions
    - Modernized commercial courts, enforcement departments, and arbitration and mediation centers in structure, proceedings, and practices through preliminary assessments, SOPs, and set of arbitration and mediation rules
    - Enhanced capacities of judges, selected public servants, local arbitrators, and mediators, and increased awareness of ADR among academics, legal and business societies

4. Create a climate of support in Parliament for anti-corruption reforms
    - Conduct information campaigns on UNCAC and the Doha Declaration for parliamentarians of both houses to sensitize them on Iraq's international obligations
    - Conduct a review of rules of conduct and training on them for parliamentarians
    - Create an anti-corruption forum comprised of representatives of the legislative and integrity committees, civil society, CoI and the Board of Supreme Audit to meet quarterly to discuss corruption and integrity challenges.

5. Increased transparency and public accountability
    - Support the CoI in strategic communications and outreach on anti-corruption issues aimed at Parliament and the public
    - Support the federal Higher and KRI Judicial Councils in developing communication strategies for corruption prosecutions and adjudications building on existing outreach efforts
    - Enhancing participation of civil society (including women and young people) and the media in accountability and policy making process and conducting responsible reporting on corruption cases
    - Improve citizen's access to information and support the implementation of access to information legislation

Overall, ACAI project contributes to:

UNDP Strategic Plan 2022-2025	Outcome 1: Advance poverty eradication in all its forms and dimensions OUTPUT 2.1 Open, agile, accountable and future-ready governance systems in place to co-create and deliver solutions to accelerate SDG achievement Indicator 2.1.1 Number of measures to strengthen accountability (including social accountability), prevent and mitigate corruption risks, and integrate anti-corruption in the management of public funds, service delivery and other sectors
Programme Outcome / UNDP Country Programme Document (2020-2024)	Outcome 3.1- Strengthened institutions and systems deliver people-centred, evidence and needs-based equitable and inclusive gender and age-responsive services, especially for the most vulnerable populations, with particular focus on advocating for women's leadership in decision-making processes
National Priority or Goal: Framework of Government Programme	National development priority: 1. Lay the foundations for good governance.
Sustainable Development Goals (SDGs)	SDG 8 and 16

This is the first evaluation to be conducted for this Project.

2. Evaluation purpose, scope, and objectives

2.1. Evaluation purpose
Against this background, during the mid-point of ACAI's implementation, an independent mid-term evaluation is envisioned to be undertaken as per the project document and the updated UNDP's Evaluation Guidelines (2021) and the Financial and Administrative Framework Agreement between the EU and the UN. The goal of the mid-term evaluation is to assess the overall progress of the ACAI project and inform the project management, project implementation team and its partners on how to improve ACAI performance (in terms of its activities, process and results) going forward. Thus, the evaluation shall document intermediate results, lessons learned and provide recommendations for strengthening the projects overall performance.

2.2. Scope of evaluation
Results scope:
The mid-term evaluation will cover the period April 2021 – October 2023, highlighting the key lessons learned to provide informed guidance for the remaining years of the project and for future programming. The evaluation will cover all activities planned and/or implemented during the period April 2021 – October 2023 and will focus on the contribution of the five project outputs to implementation and achievement of results. Capacity assessment will also be done to provide an overall assessment and analysis of existing human resource and financial capacities within the project and compare it against what is needed for the successful implementation of the remaining duration. The timing of the evaluation is designed such that it will take place at the mid of implementation so as to factor in all interventions and the associated results achieved. The key users of the MTR report will be; the UNDP Country Office, Iraqi Government Ministries and European Union Delegation.

In drafting the final report, the consultant should outline recommendations for adjustments to Project design and architecture, identify entry points to increase UNDP relevance to deliver on the national priorities and sustainable development goals.

Timeframe:
The evaluation will be conducted from November to December 2023, covering the mid-term period (April 2021 – October 2023) of the Project implementation cycle.

Geographical coverage:
Given that the Project is nationwide with a particular focus on the provinces of Anbar, Baghdad, Basra, Erbil, Sulaymaniyah, the evaluation will have a national scope.

Evaluation Audience: The evaluation will be relied upon by but no limited to: Supreme Judicial Council, Commission of Integrity (Federal and Kurdistan), Council of Representatives, Kurdistan Region Shora Council, Federal and regional Prime Minister's Offices, Parliament, Iraqi civil society organizations, UNDP and the European Union Delegation in Iraq. The evaluation will also depend and coordinate with the third party monitoring of EU and Independent Country Programme Evaluation of UNDP for detailed information on previous findings.

2.3 Evaluation Objectives
The specific objective of this Programme evaluation is to:
- Document progress and results against the theory of change and results framework and assess whether the activities and outputs delivered to date have

been effectively implemented and how such have, or are likely to, contribute to outcomes and impact.

- Review the design and effectiveness of the project, e.g. whether activities, outputs, outcomes, objectives and performance indicators are sufficiently aligned to enable an assessment of project effectiveness.
- Review what worked and what did not, and document good practices and lessons learned.
- Provide recommendations on how ACAI could strengthen its results by better aligning its priorities and strengthening partnership as envisioned by UNDP, EU and the Government of Iraq.

3. Evaluation Criteria and Key Questions

The Programme evaluation will generate evidence of progress and challenges, helping to ensure accountability for the implementation of the programme, as well as identifying and sharing knowledge and good practices through following standard Organization for Economic Cooperation and Development (OECD) Development Assistance Committee (DAC) evaluation criteria[32].

The below UNDP project quality criteria will be guiding the MTE: relevance, social and environmental sustainability, management and monitoring, efficiency, effectiveness, sustainability and national ownership. In addition, the MTR will explore extent to which UN programming principles of Human Rights Based Approach to planning (HRBA), gender equality; capacity development and results-based management have been mainstreamed throughout the implementation period.

Relevance:
- What have been the major achievements and lessons learnt since the project commenced in 2021?
- Identify contributions, gaps and/or opportunities for further progress to the country's development priorities as identified in the both the project's and UNDP Iraq CPD results and indicators framework.
- Is the current project's assistance still relevant and appropriate to the national priorities, and emerging global development agenda?
- Has the project recognized and effectively responded to urgent and emerging priorities which were not originally in the project?
- To what extent were lessons learned from other relevant projects considered in the design?

Coherence:
o To what extent did the project complement work among different entities, including development partners and civil society?
o To what extent do other interventions or policies support or undermine the project
o How were stakeholders involved in the project's design and implementation?

Efficiency:
- What is the project status with respect to targeted outputs in terms of quality and timelines?
- To what extent have the project implementation strategy and execution been efficient and cost-effective?
- If there were any delays in the project targets achievement for the performance indicators, what were the causes of the delay, and what was the effectiveness of corrective measures undertaken?

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

- To what extent were adequate resources (financial and human) secured prior to project implementation? Were the requested financial tranches received on time?
- Is there any appropriate mechanism for monitoring the progress of the project? If yes, is there adequate usage of results/data for programming and decision making?
- What are the potential challenges/risks that may prevent the project from producing the intended results?
- To what extent and how has the project mobilized and used its resources (human, technical and financial to achieve its planned results since implementation started
- To what extent has project increased synergies with other projects in UNDP and other agencies?

Effectiveness:
- Are the project's outputs clearly articulated, feasible, realistic?
- To what extent the project logic, concept and approach is appropriated and relevant to achieving the project targets and objectives?
- To what extent is the project on-track to achieve planned results (intended and unintended)?
- How were the UN programming principles mainstreamed in the design, implementation and monitoring and evaluation of the project?
- To what extent has project been able to form and maintain partnerships with other development actors including bilateral and multilateral organizations, civil society organizations, academia and the private sector to leverage results?
- What factors have contributed in achieving the desired results?
- To what extent do external factors, such as government ownership, security constraints, have impacts on project implementation?

Impact:
The extent to which the programme's is expected to contribute to longer term outcomes/results. The impact or effect of the intervention in proportion to the overall situation of the target institutions or direct beneficiaries.
- Does the overall programme intervention contribute to longer-term outcomes/results?
- What is the impact or effect of the intervention in proportion to the overall situation of the target institutions and direct beneficiaries?

Sustainability:
- Analyzing whether benefits of the programme are likely to continue after the programme cycle.
- Does the project have the capacity to sustain its operations in terms of financial and programmatic implementation?
- How strong and sustainable are UNDP systems and processes in place to continue delivering quality services to the partners.
- What lessons related to sustainability can we draw from the execution of the project?
- What are national partner's resources, motivation and ability to continue implementing project till end?
- To what extent is there constructive cooperation among the project partners? What are the levels of satisfaction of government counterparts, etc.
- What is the likelihood that project results will be sustainable in terms of systems institutions financing and anticipated impact?
- Are there any social or political risks that may jeopardize sustainability of project outputs and the project contributions to country programme outputs and outcomes?
- To what extent are the interventions well-designed and have well-planned exit strategies?

Scalability/Replicability:
- What components of the project show greater likelihood for scalability and why?
- How likely is the project or its components to be scaled or replicated by relevant ministries in government?

Cross-cutting Issues:
- Human Rights: To what extent have the poor, people with disabilities, women and other marginalized groups benefitted from implementation of the project.
- Gender Equality: To what extent has gender been addressed in the design, implementation and monitoring the different interventions? To what extent has project support promoted positive changes in gender equality? Were there any unintended effects? Is the gender marker assigned to this project representative of reality
- Capacity Building: Did the project adequately invest in, and focus on, national capacity development to ensure sustainability and promote efficiency. Are the knowledge products (reports, studies, etc.) delivered by the project utilized by the country?

4. Methodology

Based on UNDP's polices and guidelines on M&E and the standard global practices on reviewing projects/programmes, the independent consultant will discuss and design the methodology to conduct the mid-term evaluation. The evaluation process will entail a combination of desk review of all relevant project documents and knowledge products; interviews and meetings (face-to-face, Zoom/MS TEAMS meetings and/or phone interviews) with UNDP key staff, senior management, project beneficiaries, partner organizations, civil society organizations and all other relevant stakeholders. Data review and analysis of other data sources and methods will be applied as necessary. To ensure maximum validity, reliability of data (quality) and promote use, the evaluation team will ensure triangulation of the various data sources. The consultant should ensure that evaluation products address gender, disability, and human right issues.

Data from the evaluation will be triangulated to appraise and conclude findings. The consultant will be assisted by the Project M&E Specialist- (ACAI) as needed and work under the overall guidance and oversight of the UNDP Governance Pillar head.

All analysis must be based on observed facts, evidence, and data. Findings should be specific and concise and supported by information that is reliable and valid. Cross-cutting issues and the SDGs should be integrated into the final evaluation report. The final methodological approach including interview schedule, field visits and data to be used in the evaluation should be clearly outlined in the inception report and fully discussed and agreed between UNDP, key stakeholders and the evaluators.

5. Evaluation Products (Key deliverables)

The total duration of the MTE will be approximately **40 of days** over a period **of 12 of weeks starting (date)** and shall not exceed five months from when the consultant(s) are hired. The expected date start of contract is **1st November 2023**.

Working day allocation and schedule for the evaluation:

Activity	Estimated number of days
Desk Review and inception report	5 days
Data collection mission • Consultations and field visits, in-depth interviews, and focus groups	15 days

Debriefing to UNDP and key stakeholders	1 day
Evaluation report writing (draft and final report)	10 days
Final briefing of UNDP (including senior management)	1 day
Final evaluation report writing	4 days
Brief summary evaluation report	4 days
Estimated total days	**40 days**

The key deliverables that the Evaluation Team is expected to produce are:

Deliverables
Inception Report - Based on the terms of reference (TOR) and initial debriefing with the UNDP team, as well as the desk review outcomes, the consultant is expected to develop an inception report. This report should detail out the evaluator's understanding of what is being evaluated and why, the evaluation methodology that describes data collection methods and sampling plan, together with the rationale for their selection and limitations. The report should also include an evaluation matrix identifying the key evaluation questions and how they will be answered by the selected methods. Annexed workplan should include detailed schedule and resource requirements tied to evaluation activities and milestone deliverables. The presentation of the inception report will be an opportunity, for both the consultant and UNDP, for discussion and clarification.
Debriefing - after completion of the field work
Draft Evaluation Report (max 40 pages including Executive Summary) to be submitted to UNDP for review; UNDP will provide a combined set of comments, using Evaluation Report Audit Trail, to the evaluator to address the content required (as agreed in the inception report) and quality criteria as outlined in the UNDP evaluation guidelines.
A presentation will be delivered to the UNDP Team on the draft evaluation report outlining the key following aspects: (i) overall evaluation findings of ACAI, and (ii) overall evaluation findings and in-depth analysis relating to each Outputs. Feedback received from the presentation of this draft Evaluation Report should be considered when preparing the final report. The evaluator should produce an audit trail indicating whether and how each comment received was addressed in revisions to the final Report.
Final Evaluation Report (guided by the minimum requirements for a UNDP Evaluation Report /UNDP Outline of the evaluation report format (see annex 6) should be submitted to UNDP
Brief summary report (within 5 pages) linking the final evaluation findings to the country programme outcome 3.1 focusing on Governance, to be submitted before expiry of the contract.   It should be noted that the above list of deliverables, together with the implementation time-frame (see section 8) might be subject to review and revision by UNDP in discussion with the Consultant in the event of unexpected changes to the context/ working environment in Iraq during the consultancy period. Standard templates that need to be followed are provided in the Annexes section. It is expected that the Consultant will follow the UNDP evaluation guidelines and UNEG quality check list and ensure all the quality criteria are met in the evaluation report**.**

6. Evaluation ethics

"This evaluation will be conducted in accordance with the principles outlined in the UNEG 'Ethical

Guidelines for Evaluation'.[33] The consultant must safeguard the rights and confidentiality of information providers, interviewees, and stakeholders through measures to ensure compliance with legal and other relevant codes governing collection of data and reporting on data. The consultant must also ensure security of collected information before and after the evaluation and protocols to ensure anonymity and confidentiality of sources of information where that is expected. The information knowledge and data gathered in the evaluation process must also be solely used for the evaluation and not for other uses with the express authorization of UNDP and partners."

7. Management and implementation arrangements

The Project MTE is commissioned by UNDP Iraq Resident Representative delegated to the Governance Pillar. The main UNDP Focal Point will be the Monitoring, Evaluation and Reporting Specialist, - ACAI project, who will be supported by the Programme Management Support Unit (PMSU). Together the ACAI Project Management team and the PMSU will serve as the focal points for providing both substantive and logistical support to the Consultant. Assistance will be provided by the PMSU, ACAI Management team to make any refinements to the work plan of the selected Consultant (i.e. key interview partners; organize meetings; and conduct field visits (if necessary and if the security situation permits).

This TOR shall be the basis upon which compliance with assignment requirements and overall quality of services provided by the Consultant will be assessed by UNDP.

As part of the assignment:
o UNDP will provide office space with access to the internet and printer when in-country in Erbil or Baghdad, Iraq.
o UNDP will provide the following list of additional documents to the selected Consultant
  o Donor Reports
  o Relevant Financial Information
  o Contact Details of Stakeholders and Partners
  o Project Beneficiary Details
  o Risk Analyses and Lessons Learned Logs
  o Other relevant documents
o The Evaluation Consultant is expected to
  o Have/bring their laptops, and other relevant software/equipment.
  o Utilize their own mobile and personal email address during the consultancy period, including when in-country.
  o Make their own travel arrangements to fly in-country and transportation arrangements outside work hours.

Make necessary arrangements for translations during interviews/focus group discussions/consultations. Therefore, the evaluator is encouraged to have at least 1 Arabic language speaker.

8. Locations and timeframe for the evaluation process

The detailed evaluation workplan will be agreed upon between the UNDP and the selected Consultant. The Project evaluation will take place over a period **40 working days** between including a combination of home-based work and one (1) in-country visit, which includes travel to Project implementation locations in Baghdad, Basra, Erbil and Sulaymaniyah. The security situation in each location will be reviewed prior to roll out of the final field visit plan. The assignment and final deliverable are expected to be completed no later than **31st January 2024**, with the detail as described in the below table.

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[33] UNEG, 'Ethical Guidelines for Evaluation, updated June 2020:
http://www.unevaluation.org/document/detail/2866

ACTIVITY	ESTIMATED # OF DAYS	DATE OF COMPLETION	PLACE	RESPONSIBLE PARTY
Meeting briefing with UNDP (project manager and staff as needed)	-	At the time of contract signing-	Home-based & UNDP CO (online)	Consultant UNDP Team
Sharing of the relevant documentation with the consultant	-	At the time of contract signing	Via email	UNDP Team
Desk review, evaluation design, methodology and updated workplan including the list of stakeholders to be interviewed	5 days	Within 5 days of contract signing-	Home-based	Consultant
Submission of the inception report (15 pages maximum)	-	Within five days of contract signing-		Consultant
Deliverable 1: Comments and approval of inception report	-	Within three days of submission of the inception report-	UNDP Country Office	Consultant UNDP Team
Consultations and field visits, in-depth interviews and focus groups	15 days	Within four weeks of contract signing-	In country (field visits)	Consultant
Deliverable 2: Debriefing to UNDP	1 day		In country	Consultant
Preparation of draft evaluation report (50 pages maximum excluding annexes), executive summary (5 pages)	10 days	Within two weeks of the completion of the field mission-	Home-based	Consultant
Deliverable 3: Draft evaluation report submission	-	*Within two weeks of the completion of the field mission-*		Consultant
Consolidated UNDP and stakeholder comments to the draft report	-	Within one week of submission of the draft evaluation report-	UNDP Country Office	UNDP Team
Final debriefing with UNDP (including Senior Management)	1 day	Within one week of receipt of comments-	Home-based & UNDP CO (online)	Consultant UNDP Team
Deliverable 4: Final evaluation report incorporating additions and comments	4 days	Within one weeks of final debriefing- …..	Home-based	Consultant

provided by programme staff and UNDP country office				
Submission of the brief summary report linking SJSG evaluation to the Governance outcome (5 pages maximum excluding annexes)	4 days	Within one weeks of final debriefing-	Home-based	Consultant
Deliverable 5: Approval of the brief summary report		By the time of contract ending-	Home-based & UNDP CO (online)	
Estimated total workdays for the evaluation	**40 days**			

9. Indicative payment schedule and modalities

The consultant is expected to deliver the following outputs / deliverables. It should be noted that the following list of outputs/ deliverables might be subject to review and revision by UNDP in discussion with the consultant in the event of unexpected changes to the context / working environment in Baghdad/ Iraq during the consultancy period. Payments will be made upon acceptance and approval by UNDP of the planned deliverables, based on the following tentative payment schedule:

Terms of Payment	Percentage (%)
(i) Upon the satisfactory **completion and acceptance of Inception Report** and Presentation As part of the final Inception report it must include as a minimum: o Updates to evaluation methodology and work plan o Final Evaluation report template o Questionnaires for Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) o Sampling methodology and work plan, as applicable o List of interviewees and desk review documents	15%
(ii) Upon the satisfactory completion of the field work in keeping with the agreed work plan and its debriefing	20%
(iii) Upon the satisfactory submission and acceptance of the draft Evaluation Report	30%
(iv) Upon the satisfactory (a) final debriefing addressing comments received on draft Evaluation Report, and (b) submission and acceptance of the final Evaluation Report duly approved by UNDP's Monitoring, Evaluation and Reporting Specialist / Programme Management Support Unit.	35%

*NB Travel and accommodation:
All envisaged travel costs must be included in the financial proposal. This includes all travel within country or outside duty station/ repatriation travel. In general, UNDP does not accept travel costs exceeding those of an economy class ticket. In cases where UNDP arranges and

provides travel and/or accommodation due to security and other reasons, it should be noted that these costs will be deducted from the payments to the Consultant.
In the case of unforeseeable travel, payment of travel costs including tickets, lodging and terminal expenses should be agreed upon in writing, between UNDP and selected Consultant prior to travel and will be reimbursed.

10. Evaluation team composition and required competencies

UNDP seeks to recruit an International Consultant with the following profile. The Consultant must have high levels of relevant technical expertise; rigorous research and drafting skills; and the capacity to conduct an independent and quality evaluation. Qualified female candidates are strongly encouraged to apply.

Education:
- Master's degree in public administration, law, political science, finance, economics, international relations, development studies, or related field.

Experience:
- At least 10 years of working experience in programme/project management, monitoring and evaluation or design of anti-corruption measures.
- A prior record of producing research studies (preferably in anti-corruption).
- Project evaluation experience with international development partners and United Nations system

Language Requirements:
- Strong reading, writing, spoken skills in English.
- Written, spoken skills in Arabic will be an added advantage.

Corporate Competencies
o Demonstrates commitment to the UN's values and ethical standards.
o Promotes the mission, vision and strategic goals of UNDP.
o Displays cultural, gender, religion, race, nationality and age sensitivity and adaptability.
o Treats all people fairly and with impartiality.

Functional Competencies
o Consistently approaches work with energy and a positive, constructive attitude.
o Ability to work under pressure and to meet deadlines.
o Demonstrates excellent oral and written communication skills.
o Demonstrates openness to change and ability to manage complexities.
o Self-reliant and able to work as a part of a multi-cultural team in a stressful.

Professionalism
o Shows pride in work and in achievements; is conscientious and efficient in meeting commitments; observing deadlines and achieving results; is motivated by professional rather than personal concerns; shows persistence when faced with difficult problems or challenges and, remains calm in stressful situations.

Communication
o Speaks and writes clearly and effectively; listens to others, correctly interprets messages from others and, responds appropriately; asks questions to clarify and, exhibits interest in having two-way communication; tailors language, tone, style and, format to match the audience and, demonstrates openness in sharing information and, keeping people informed.

Planning and Organizing

o Identifies priority activities and assignments; allocates appropriate amount of time and resources for completing work; foresees risks and allows for contingencies when planning; monitors and adjusts plans and actions as necessary and, uses time efficiently.

Client Orientation
o Considers all those to whom services are provided to be "clients" and seeks to see things from clients' point of view; establishes and maintains productive partnerships with clients by gaining their trust and respect and, meets time line for delivery of product or services to client.

Teamwork
o Works collaboratively with colleagues to achieve organisational goals; builds consensus for task purpose and direction with team members and, supports and acts in accordance with final group decisions, even when such decisions may not entirely reflect own position.

Technological awareness
o Keeps abreast of available technology, actively seeks to apply technology to appropriate tasks and, shows willingness to learn new technology.

11. Application submission process and criteria for selection:

Application Process
Interested qualified and experienced individual consultants must submit the following documents/information to demonstrate their qualifications and interest:
1. Letter of Confirmation of interest and availability using the template provided by UNDP; please see attached template.
2. Most Updated Personal detailed CV including past experience in similar assignment and at least 3 references.
3. UN P11 Form ("CV Form");
4. A detailed methodology on how the candidate will approach and conduct the work and
5. Two samples of evaluation reports done/authored within the past two years.

Note: Applicants must not have worked in the design or implementation of this project or in an advisory capacity for any of the interventions, directly as consultants or through service providers.

Submitted proposals will be assessed using Cumulative Analysis Method. The proposals will be weighed according to the technical proposal (carrying 70%) and financial proposal (carrying 30%). Technical proposals should obtain a minimum of 70 points to qualify and to be considered. Financial proposals will be opened only for those application that obtained 70 or above in the technical proposal. Below are the criteria and points for technical and financial proposals

Evaluation Criteria		Max. Point 100	Weight
Technical	**Criteria A:** relevance and responsiveness of candidate's past experience, Qualification based on submitted documents: o Master's degree in public administration, law, political science, finance, economics, international relations, development studies, or related field **(10 points)** o At least 10 years' experience in evaluation of anti-corruption, arbitration and justice sector projects/programmes in crisis countries **(10 points)** o Previous experience and substantive knowledge on results-based management (RBM) and results-oriented monitoring and evaluation **(10 points)**	**60 Points**	**70%**

Evaluation Criteria	Max. Point 100	Weight
o Experience of working with government institutions in post-conflict settings (**10 points)** o Experience of working at the policy level/strategic level (**10 points**) o Excellent report writing skills **(10 points)**		
Criteria B: relevance and responsiveness of candidate's approach, technical proposal and submitted work plan and Methodologies: o Time plan, methodology on how the consultant will conduct the required tasks **(10 points)** o Experience in the usage of computers and office software packages (MS Word, Excel, etc) **(10 points)**	**40 Points**	
Financial <u>**Lowest Offer / Offer*100**</u>		**30%**
Total Score = (Technical Score * 0.7 + Financial Score * 0.3)		

Weight Per Technical Competence	
5 (outstanding): 96% - 100%	The individual consultant/contractor has demonstrated an OUTSTANDING capacity for the analyzed competence.
4 (Very good): 86% - 95%	The individual consultant/contractor has demonstrated a VERY GOOD capacity for the analyzed competence.
3 (Good): 76% - 85%	The individual consultant/contractor has demonstrated a GOOD capacity for the analyzed competence.
2 (Satisfactory): 70% - 75%	The individual consultant/contractor has demonstrated a SATISFACTORY capacity for the analyzed competence.
1 (Weak): Below 70%	The individual consultant/contractor has demonstrated a WEAK capacity for the analyzed competence.

12. TOR Annexes

This section presents additional documents to facilitate the proposal preparation by the Consultant.

Annex 1: a) Programme Document contains the Programme's Results and Resources Framework b) Project Partners & Stakeholders

Annex 2: Documents to be consulted
UNDP Handbook on Monitoring and Evaluation for development results: http://web.undp.org/evaluation/handbook/documents/english/pme-handbook
UNDP Evaluation Guidelines (June 2021): http://web.undp.org/evaluation/guideline/documents/PDF/UNDP_Evaluation_Guidelines
UN Ethical Guidelines for Evaluation: http://www.unevaluation.org/document/download/547
UNDP Country Programme Document (CPD) 2020-2024: https://www.iq.undp.org/content/iraq/en/home/library/iraq-cpd-2020-2024.html

Annex 3: Evaluation matrix (Sample Evaluation Matrix) – to be included in the inception report.

Table A. Sample of evaluation matrix						
Relevant evaluation criteria	Key questions	Specific sub-questions	Data sources	Data collection methods/tools	Indicators/ success standard	Data analysis method

Annex 4: Code of conduct forms.
The Consultant Firm and each member of the Evaluation Team consultant will be requested to read carefully, understand and sign the "UN Code of Conduct."
Annex 5: Suggested minimum content/ guidance on Inception Report Template

Annex 6: Guidance on Evaluation Report Template (Refer Annex 4 – PDF pages 118-122): http://web.undp.org/evaluation/guideline/documents/PDF/section-6
Annex 6: Evaluation guidelines during COVID-19
Annex 7: Integrating Gender Equality and Human Rights in Evaluation - UN-SWAP Guidance, Analysis and Good Practices
- http://www.unevaluation.org/document/download/2107
- http://www.unevaluation.org/document/download/2695
Annex 8: Audit trail Template
Annex 9: Quality Assessment Checklists-June 2021 (http://web.undp.org/evaluation/guideline/section-6.shtml)
Annex 10: Dispute and wrongdoing resolution process and contact details (will also be provided at the time of signing the contract)

Annex 2. Evaluation Matrix

Evaluation Questions	Specific sub-questions	Indicators/ Standards	Data Sources	Data Collection Methods/ Tools	Data Analysis Method
Relevance					
What have been the major achievements and lessons learnt since the project commenced in 2021?	Specific outcomes achieved in line with project objectives. Key lessons learned during project implementation.	Number and type of activities completed vs. planned. Beneficiary feedback on project implementation to date. Examples of adaptive management in response to challenges.	Project reports, activity reports, stakeholder interviews	Document review, key informant interviews	Thematic, content analysis
Identify contributions, gaps and/or opportunities for further progress to the country's development priorities as identified in the both the project's and UNDP Iraq CPD results and indicators framework.	Alignment of project activities with national development priorities and CPD indicators. Identified gaps in contributions to national priorities. Opportunities for enhancing alignment with CPD results.	Degree of alignment with CPD indicators and national development priorities. Identified gaps in meeting national priorities. Potential areas for future contributions.	Project documents, UNDP CPD, national development plans	Document review	Comparative analysis
Is the current project's assistance still relevant and appropriate to the national priorities, and emerging global development agenda?	Current alignment of project assistance with national priorities. Relevance of project activities to the global development agenda.	Level of alignment with national development priorities. Evidence of contribution to SDGs and other global commitments.	National development plans, project documents, stakeholder interviews	Document review, key informant interviews	Thematic content analysis
To what extent is the project relevant to beneficiary needs?	Effectiveness of the project in addressing the specific needs of target beneficiaries. Alignment of the project's activities and outputs with beneficiaries' priorities.	Degree of alignment between project objectives and beneficiary needs Beneficiary satisfaction with project activities and outputs	Project documents, Beneficiary interviews	Document review, key informant interviews, focus group discussions	Content, thematic analysis

To what extent do the project's assumptions hold true in the current context?	Validity of the project's assumptions considering the current political, economic, and security situation in Iraq. Impact of changes in the external environment on the relevance of the project's assumptions.	Alignment of assumptions with current context Evidence of external factors influencing assumptions	Project documents Stakeholder interviews	Document review, key informant interviews, focus group discussions	Content, thematic analysis
Has the project recognized and effectively responded to urgent and emerging priorities which were not originally in the project?	Identification and response to emerging priorities. Flexibility and adaptability of project design and implementation.	Instances of project adaptation to new priorities. Stakeholder satisfaction with responses to emerging issues.	Project reports, stakeholder interviews	Document review, key informant interviews	Thematic content analysis
To what extent were lessons learned from other relevant projects considered in the design?	Incorporation of lessons from previous similar projects. Mechanisms for integrating lessons into project design.	Evidence of lessons learned integrated into project planning. Feedback from project design team on use of past project evaluations.	Project design documents, evaluation reports of previous similar projects, interviews with project design team	Document review, key informant interviews	Thematic content analysis
Coherence					
To what extent did the project complement work among different entities, including development partners and civil society?	Degree of coordination and collaboration with other entities. Examples of complementarity in activities and objectives.	Number and quality of partnerships with other entities. Evidence of joint activities or shared outcomes. Stakeholder feedback on complementarity.	Project reports, partnership agreements, stakeholder interviews	Document review, key informant interviews	Quantitative analysis of partnerships, thematic content analysis
To what extent has project increased synergies with other projects in UNDP and other agencies?	Examples of collaborative efforts with other projects/agencies. Impact of synergies on project outcomes.	Number and type of synergies established. Assessment of the added value from these synergies.	Project reports, partnership agreements, stakeholder interviews	Document review, key informant interviews	Quantitative analysis of synergies, thematic content analysis

How have changes in the external environment affected the project's theory of change?	Influence of external factors on the project's implementation and outcomes. Adjustments made to the project's theory of change in response to these factors.	Identification of external factors affecting the project Evidence of adaptive management in response to changes	Project reports, stakeholder interviews	Document review, key informant interviews	Content analysis, thematic analysis.
To what extent do other interventions or policies support or undermine the project	Identification of synergies and conflicts with other interventions or policies. Impact of external interventions or policies on project outcomes.	Instances of support or hindrance from external interventions or policies. Adjustments made to the project to align with or mitigate external influences.	Project reports, policy documents	Document review	Thematic content analysis
How were stakeholders involved in the project's design and implementation?	Mechanisms for stakeholder engagement. Extent of stakeholder input in project phases. Satisfaction of stakeholders with their level of involvement.	Types and frequency of stakeholder engagement activities. Evidence of stakeholder inputs incorporated into project design and implementation.	Project documents, stakeholder engagement plans, stakeholder interviews	Document review, key informant interviews	Thematic content analysis
Efficiency					
What is the project status with respect to targeted outputs in terms of quality and timelines?	Comparison of planned vs. achieved outputs.	Percentage of outputs achieved on time.	Project reports, monitoring data	Document review, key informant interviews	Quantitative analysis of output achievement
To what extent have the project implementation strategy and execution been efficient and cost-effective?	Analysis of cost per output/ outcome. Comparison of planned vs. actual expenditure.	Efficiency ratio (cost-effectiveness). Deviations from the budget and reasons.	Project financial reports, project documents	Document review, ey informant interviews	Cost-effectiveness analysis, budget variance analysis
If there were any delays in the project targets achievement for the performance indicators, what were the causes of the delay, and what was the effectiveness of corrective measures undertaken?	Identification of delays and their causes. Evaluation of the impact of delays on project outcomes.	List of delayed targets and reasons. Changes in project indicators post-correction.	Project reports, monitoring data, stakeholder interviews	Document review, key informant interviews	Thematic content analysis, pre-post comparison of indicators

	Assessment of corrective actions taken.				
To what extent were adequate resources (financial and human) secured prior to project implementation? Were the requested financial tranches received on time?	Analysis of resource allocation vs. project needs.\n\nTimeliness of financial disbursements.	Percentage of resource requirements met.\n\nTimeline of financial tranche receipts.	Project budget, financial reports, project documents	Document review, key informant interviews	Resource gap analysis, financial timeline analysis
Is there any appropriate mechanism for monitoring the progress of the project? If yes, is there adequate usage of results/data for programming and decision making?	Existence of monitoring mechanisms.\n\nExtent of data utilization for project management.	Effectiveness rating of the monitoring system.\n\nExamples of data-driven decision making.	Project monitoring plan, monitoring reports, project meeting minutes, stakeholder interviews	Document review, key informant interviews	Monitoring system assessment, thematic content analysis
What are the potential challenges/risks that may prevent the project from producing the intended results?	Identification of internal and external risks.\n\nRisk mitigation strategies and their effectiveness.	List of identified risks and their potential impact.\n\nStatus of risk mitigation measures.	Project risk log, project reports, stakeholder interviews	Document review, key informant interviews	Risk assessment, thematic content analysis
To what extent and how has the project mobilized and used its resources (human, technical and financial to achieve its planned results since implementation started	Efficiency of resource mobilization.\n\nEffectiveness of resource utilization.	Resource utilization rate.\n\nAchievements vs. resources used.	Project financial reports, project progress reports, stakeholder interviews	Document review, key informant interviews	Resource utilization analysis
Effectiveness					
Are the project's outputs clearly articulated, feasible, realistic?	Clarity of output descriptions.	Number of outputs with clear, measurable definitions.	Project documents	Document review	Content analysis, thematic analysis
To what extent the project logic, concept and approach is appropriated and relevant to achieving the project targets and objectives?	Alignment of project logic with targets and objectives.\n\nRelevance of the project approach to the context and needs.	Logic model or theory of change analysis.\n\nCorrespondence between project approach and achievement of objectives.	Project documents	Document review,	Thematic analysis

Are there any unintended consequences or alternative pathways that have emerged during project implementation?	Observation of unexpected outcomes (positive or negative) during project implementation. Emergence of alternative approaches or strategies as a result of the project's activities.	Examples of unintended consequences Identification of alternative pathways or approaches	Project reports, stakeholder interviews	Document review, Key informant interviews, Focus group discussions	Content analysis, Thematic analysis.
To what extent is the project on-track to achieve planned results (intended and unintended)?	Progress towards achievement of specific project results. Identification of unintended results.	Percentage of milestones achieved on schedule. Documented instances of unintended results.	Project documents, monitoring data	Document review, key informant interviews	Progress analysis, content analysis
How were the UN programming principles mainstreamed in the design, implementation and monitoring and evaluation of the project?	Integration of UN principles such as human rights, gender equality, environmental sustainability, etc.	Evidence of principles reflected in project activities and M&E practices. Changes made to incorporate UN principles.	Project documents, M&E reports	Document review,	Content analysis, thematic analysis
To what extent has project been able to form and maintain partnerships with other development actors including bilateral and multilateral organizations, civil society organizations, academia and the private sector to leverage results?	Number and quality of partnerships formed. Impact of partnerships on project results.	List of partners and nature of collaboration. Assessment of partnership contributions to project outcomes.	Project reports, partnership agreements, stakeholder interviews	Document review, key informant interviews	Partnership analysis, contribution analysis
What factors have contributed in achieving the desired results?	Internal and external factors that have supported the achievement of results.	Identified factors linked to successful outcomes. Stakeholder perceptions of contributory factors.	Project reports, stakeholder interviews	Document review, key informant interviews	Factor analysis, thematic analysis
To what extent do external factors, such as government ownership, security constraints, have impacts on project implementation?	Impact of government support or lack thereof. Effects of security constraints on implementation.	Examples of government or external support impacting project. Adjustments made in response to security constraints.	Project reports	Document review	Impact analysis, thematic analysis

Impact					
Does the overall programme intervention contribute to longer-term outcomes/results?	Analysis of the program's alignment with broader sectoral or national long-term goals. Evidence of program influence on systemic changes or capacity building.	Degree of alignment with national or sectoral long-term goals. Examples of systemic changes attributable to the program.	National development plans, project reports	Document review	Alignment analysis, contribution analysis
What is the impact or effect of the intervention in proportion to the overall situation of the target institutions and direct beneficiaries?	Relative significance of the intervention's impact on target groups. Changes in the capacity, practices, or outcomes for target institutions/beneficiaries.	Measures of capacity or practice changes in target institutions. Beneficiary reports of changes in condition or opportunities.	Institutional assessments, stakeholder interviews	Document review, key informant interviews	Impact analysis, thematic analysis
Sustainability					
Analyzing whether benefits of the programme are likely to continue after the programme cycle.	Assessment of the sustainability of program benefits.	Strategies in place for benefit continuation.	Project documents, sustainability plans, stakeholder interviews	Document review, key informant interviews	Sustainability assessment, thematic analysis
Does the project have the capacity to sustain its operations in terms of financial and programmatic implementation?	Evaluation of financial sustainability. Assessment of programmatic sustainability.	Plans for financial sustainability post-funding. Capacity for independent programmatic continuation.	Project financial reports, project plans	Document review, key informant interviews	Financial analysis, programmatic sustainability assessment
How strong and sustainable are UNDP systems and processes in place to continue delivering quality services to the partners	Robustness of UNDP systems for continued service delivery.	System and process assessment.	UNDP operational documents	Document review	Systems analysis, partner feedback analysis
What lessons related to sustainability can we draw from the execution of the project?	Identified best practices and challenges for sustainability.	Compilation of lessons learned. Recommendations for future sustainability.	Project reports, stakeholder interviews	Document review, key informant interviews	Lessons learned analysis, thematic analysis
What are national partner's resources, motivation and ability	Assessment of national partner's commitment and capacity.	Availability of resources.	Partner capacity assessments,	Document review, key informant interviews	Thematic analysis

to continue implementing project till end?		Demonstrated motivation and commitment.	stakeholder interviews		
To what extent is there constructive cooperation among the project partners? What are the levels of satisfaction of government counterparts, etc.	Quality of cooperation. Satisfaction levels among partners and government counterparts.	Measures of partner cooperation.	Project meeting minutes, partner feedback, stakeholder interviews	Document review, key informant interviews	Partnership analysis, satisfaction analysis
What is the likelihood that project results will be sustainable in terms of systems institutions financing and anticipated impact?	Projection of sustainability in various aspects.	Sustainability assessment across key areas.	Project documents, institutional plans	Document review	Sustainability analysis, thematic analysis
Are there any social or political risks that may jeopardize sustainability of project outputs and the project contributions to country programme outputs and outcomes?	Identification of potential social and political risks.	Risk analysis and mitigation strategies in place.	Risk assessments, project reports, stakeholder interviews	Document review, key informant interviews	Risk analysis, thematic analysis
To what extent are the interventions well-designed and have well-planned exit strategies?	Evaluation of intervention design and exit strategy effectiveness.	Quality of design and exit strategies.	Project design documents	Document review	Design and strategy analysis, thematic analysis
Scalability/Replicability					
What components of the project show greater likelihood for scalability and why?	Identification of scalable project components. Factors contributing to the scalability of these components.	Scalability assessment criteria met by project components. Stakeholder and expert opinions on scalability factors.	Project reports, scalability assessments, stakeholder interviews	Document review, key informant interviews	Component analysis, thematic analysis
How likely is the project or its components to be scaled or replicated by relevant ministries in government?	Government interest and capacity to scale or replicate project components. Alignment of project components with government priorities and systems.	Indications of government commitment to scaling/replication. Compatibility of project components with existing government initiatives and systems.	Government communications, project reports	Document review, key informant interviews	Government capacity analysis, alignment analysis

Cross-cutting Issues					
Human Rights: To what extent have the poor, people with disabilities, women and other marginalized groups benefitted from implementation of the project.	Level of improvement in access to services and rights for targeted groups. Specific benefits realized by marginalized groups.	Increased access to services (quantitative). Qualitative improvements in the living conditions of marginalized groups.	Project beneficiary data, stakeholder interviews	Document review, key informant interviews	Beneficiary analysis, thematic analysis
Gender Equality: To what extent has gender been addressed in the design, implementation and monitoring the different interventions? To what extent has project support promoted positive changes in gender equality? Were there any unintended effects? Is the gender marker assigned to this project representative of reality	Integration of gender considerations in project phases. Impact on gender equality. Presence of unintended gender-related outcomes. Accuracy of the project's gender marker.	Gender-responsive measures implemented. Changes in gender equality indicators. Analysis of unintended effects. Alignment of gender marker with project activities and outcomes.	Project documents,	Document review, gender analysis,	Gender assessment, thematic analysis
Women Empowerment: To what extent has the project contributed to women's empowerment?	Effectiveness of the project in addressing women's needs and priorities. Implementation of specific activities or interventions to promote women's empowerment.	Evidence of project activities targeting women's needs Examples of women's empowerment outcomes	Project documents, stakeholder interviews	Document review, key informant interviews, Focus group discussions	Gender assessment, content analysis, thematic analysis
Capacity Building: Did the project adequately invest in, and focus on, national capacity development to ensure sustainability and promote efficiency. Are the knowledge products (reports, studies, etc.) delivered by the project utilized by the country?	Scope and effectiveness of capacity-building activities. Utilization of knowledge products by national entities.	Number and type of capacity-building initiatives. Evidence of knowledge product usage and impact.	Project reports, capacity assessment data	Document review	Capacity development assessment, knowledge product impact analysis

Annex 3. Theory of Change

Anti-Corruption: Corruption in Iraq is widespread, entrenched and institutionalized over two decades by an impunity that thrives on a political economy of state and market. As a result, legislations fighting corruption are inadequate and not updated, institutions weak and lacking integrity, public officials in need of skills and practical tools, and civil society and media operate in an environment of fear and suppression. The impunity for corruption is sustained when the justice sector is unable to investigate, prosecute and adjudicate acts of corruption. Through this Project, the justice sector's capacity and integrity will be strengthened through training of investigators, prosecutors, judges and lawyers on diverse technical skills and code of conducts, strategic and legislative environments will improve, awareness of anti-corruption will be enhanced and active participation of parliamentarians, civil society and media in the communication and reporting of anti-corruption issues will foster a culture of integrity. Such efforts will result to the adoption of new modern legislatives, integration of international anti-corruption standards and good practices; communicating lessons learned to stakeholders, as well as the establishment of an effective trial monitoring mechanism. These will inevitably increase accountability, transparency and integrity of the judiciary system and effectively contribute to the curbing of corruption in Iraq.

Commercial Dispute Resolution: The denial of equal access to informal commercial dispute resolution mechanisms in a country hinders its economic growth and impedes cross-border trade. The adoption of modern, enforceable, and binding dispute settlement mechanisms, i.e., arbitration and mediation, is crucial to provide secure investment climate to local and international businesses that would attract more investments. The Commercial Dispute Resolution Initiative aims to enhance access to informal justice and promote informal dispute resolution mechanisms through in Iraq, including Erbil, through; (1) reforming legislative framework; reviewing existing legislations, highlighting gaps, benchmarking against international best practices, and recommending amendments while addressing domestic needs, (2) developing institutions; courts, enforcement departments, ADRs centers to expand commercial courts subject-matter jurisdictions and establish modernized ADRs centers and proceedings, and (3) building capacities of judges, public servants, arbitrators, mediators, and university students through providing specialized training programs to bridge performance and knowledge gaps. The ultimate outcomes of the Initiative is to achieve a comprehensive legislative framework for commercial dispute resolutions, in Iraq that is compatible with Iraq's obligations under international conventions, mainly, New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards, and international best practices, enhanced institutional and individual capacities, transforming the commercial dispute resolution system by modernizing the courts' hearing and expanding its jurisdiction to judicial arbitral matters and modern transaction disputes, and boosting the judges, arbitrators and attorney's understanding and conduct of arbitration proceedings.

Annex 4. Stakeholder Grouping and Data Collection[34]

Entities	Data collection and Modality	Gender and Number of Participants[35]
Group 1. Implementing Agency Interlocutors		
UNDP DRR	Online KII	1M
UNDP DRR Operations	Offline KII	1M
UNDP Iraq Governance Pillar/ Governance Pillar of UNDP Iraq's Programme Portfolio	Online KII	1F
Project Manager	Online KII	1M
Technical Experts (1 expert per output; selection based on the highest relevance, seniority/leadership towards the topic)	Online KII	1M 1M 1F
Technical Expert Arbitration	Online KII	1F
Project Officer	Online KII	1M
Project M&E and Reporting Specialist	Online KII	1F
Project Associate-Administration and Finance	Online KII	1F
Group 2. Direct Beneficiaries		
Ashuor Foundation for Relief and Development	Online KII	1M
CoI	Offline KII	1M
Supreme Judicial Council	Offline KII	1M
National Investment Committee	Offline FGD	3M 1F
Al-Karkh Court of Appeal	Offline KII	1M
Baghdad University	Online KII	1M
Investigator organization for the rule of law	Online KII	1M
CSO activist/ training beneficiary	Online KII	1M
KRI General Prosecutor	Offline KII	1M
Vision foundation for human rights	Offline KII	1M
KRI Parliament	Offline KII	1M
KRI Bar Association	Offline FGD	2M
Group 3. External Stakeholders		
EU Delegation	Online KII	1F
UNAMI Human Rights	Offline KII	1M
College of Law, AUIS	Online KII	1M

The evaluator attended the June 6th, 2024 launch of the Trial Monitoring Report in Baghdad, an event organized by UNDP with EU funding, in collaboration with Iraq's Supreme Judicial Council and UNAMI's Human Rights Office.

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[34] Note on the fact that the names of the interlocutors are not being indicated in this report to assure efficient personal data protection.

[35] In some interviews, particularly at CoI, KRI General Prosecutor, and KRI Parliament, non-participating individuals were present. The participant count reflects only those who actively contributed to the discussion.

Annex 5. In-Depth Analysis of Group 1 Interview Data

This annex presents an in-depth analysis of the interview data collected across three stakeholder groups: Implementation Actors, Direct Beneficiaries, and External Stakeholders.

Group 1. Implementing Agency Interlocutors: 11 interviews with 12 interlocutors

Thematic Analysis and Frequency (descending order)

1. Capacity Building and Training (Mentioned 9)
   - Training for judges, prosecutors, investigators on anti-corruption topics
   - Workshops on digital forensics, e-crimes, bribery investigation
   - Training for investigative journalists

2. Legislative and Policy Reforms (Mentioned 8)
   - Draft arbitration law approved by Council of Ministers and sent to Parliament
   - Iraq signed Singapore Mediation Convention
   - Work on access to information law, conflict of interest law, asset recovery law
   - Support for anti-corruption strategy implementation

3. Government Bureaucracy and Delays (Mentioned 8)
   - Slow progress in adopting drafted legislation
   - Multiple layers of approval required
   - Changes in government officials disrupting continuity

4. Recruitment and Staffing Issues (Mentioned 7)
   - Long recruitment processes (4-6 months) for hiring experts
   - Difficulty finding qualified experts willing to work in Iraq
   - Project understaffed in some areas

5. Need for Government Ownership and Funding (Mentioned 7)
   - Importance of government co-financing to demonstrate commitment
   - Need to develop "bankable ideas" to attract government investment
   - Reliance on single donor (EU) seen as a risk

6. Efforts to Increase Women's Participation (Mentioned 7)
   - Requests for 50% female participation in trainings when possible
   - Specific workshops organized for women judges
   - Challenges due to low numbers of women in senior positions

7. Trial Monitoring Program (Mentioned 6)
   - Exceeded targets, monitoring 300 trials per year vs 100 planned
   - Provided insights into judicial processes and areas for improvement

8. Shift Towards Advocacy and Public Engagement (Mentioned 6)
   - Suggestions to focus more on awareness-raising and public advocacy
   - Potential to leverage social media and public events (e.g. anti-corruption run)
   - Making anti-corruption more visible in government messaging

9. Donor Relations and Reporting (Mentioned 6)
   - Regular financial and narrative reporting to EU
   - Challenges with EU's 70% expenditure rule for tranche releases

10. Resistance to Transparency (Mentioned 5)

- Reluctance to share information or allow access to internal processes
- Resistance to external scrutiny, especially from Commission of Integrity

11. Institutionalization of Training and Tools (Mentioned 5)
   - Training of trainers to build long-term capacity
   - Development of manuals and standard operating procedures
   - Integration of anti-corruption modules into academic curricula

12. Inter-Agency Coordination (Mentioned 7)
   - Collaboration with UNODC, GIZ, OHCHR on various components
   - Anti-Corruption Coordination Forum bringing together international partners

13. Cultural and Social Barriers (Mentioned 4)
   - Restrictions on women's travel for training events
   - Resistance to use of term "gender" in some contexts

SWOT Analysis of Group 1 Interview Data

Strengths	Weaknesses
- Strong legislative and policy reform achievements - Effective capacity building programs - Successful trial monitoring program - Good relationships with main government stakeholders - Strong inter-agency coordination	- Recruitment and staffing challenges - Over-reliance on a single donor (EU) - Limited focus on advocacy and public engagement - Challenges in ensuring women's participation - Bureaucratic delays in project implementation
Opportunities	Threats
- Potential for increased government ownership and funding - Expansion of advocacy and public engagement efforts - Institutionalization of training and tools - Digitalization initiatives - Growing interest in arbitration and mediation	- Political instability and changes in government - Resistance to transparency from some government entities - Systemic corruption deeply embedded in Iraqi institutions - Security concerns - Lack of sustained funding beyond the current project phase

Annex 6. In-Depth Analysis of Group 2 Interview Data

Group 2. Direct Beneficiary Interlocutors: 12 interviews with 16 interlocutors

Thematic Analysis and Frequency (descending order)

1. Relevance and Importance of Training (Mentioned 15 times)
   - Investigative journalism training highly relevant to Iraqi context
   - Anti-corruption efforts seen as crucial
   - Arbitration and alternative dispute resolution training further needed

2. Project Implementation and Quality (Mentioned 14 times)
   - High-quality training provided
   - Project team's flexibility and responsiveness
   - Professional trainers and experts
   - Professionalism of trial monitoring implementation
   - Some concerns about relevance of international examples to Iraqi context

3. Recommendations for Improvement (Mentioned 13 times)
   - More focus on local context and laws
   - Increased involvement of Iraqi experts
   - Better coordination between different stakeholders
   - More practical, hands-on training experiences
   - Importance of digital skills in anti-corruption work

4. Security Concerns (Mentioned 12 times)
   - Personal safety of journalists and activists
   - Need for protection mechanisms
   - Challenges in publishing sensitive information

5. Legal Framework and Institutional Challenges (Mentioned 11 times)
   - Need for improved arbitration laws
   - Challenges in implementing anti-corruption measures
   - Lack of trust between government and civil society and vice-versa

6. Gender Balance and Women's Empowerment (Mentioned 8 times)
   - Specific sessions on women's empowerment in investigative journalism
   - Need for more focus on women's issues in anti-corruption efforts

7. Sustainability Concerns (Mentioned 7 times)
   - Uncertainty about long-term impact without continued support
   - Need for funding opportunities to apply learned skills
   - Importance of creating sustainable networks and institutions

SWOT Analysis of Group 2 Interview Data

Strengths	Weaknesses
- High relevance and importance of training to Iraqi context - High-quality project implementation and training delivery - Project team's flexibility and responsiveness - Professional trainers and experts - Professionalism in trial monitoring implementation - Specific focus on women's empowerment in investigative journalism	- Some concerns about relevance of international examples to Iraqi context - Limited focus on women's issues in anti-corruption efforts - Insufficient attention to digital skills in anti-corruption work - Lack of trust between government and civil society
Opportunities	**Threats**
- High demand for investigative journalism and anti-corruption training - Potential to strengthen legal framework for anti-corruption efforts - Scope for increased involvement of Iraqi experts in training delivery - Possibility of creating sustainable networks and institutions	- Significant security concerns for journalists and activists - Challenges in publishing sensitive information - Institutional challenges in implementing anti-corruption measures - Uncertainty about long-term impact without continued support - Lack of funding opportunities to apply learned skills

Annex 7. In-Depth Analysis of Group 3 Interview Data

Group 3. External Stakeholders: 3 interviews with 3 interlocutors[36]

Thematic Analysis and Frequency (descending order)

1. Arbitration and Alternative Dispute Resolution (Mentioned 12 times)
   - Lack of awareness and education about arbitration in Iraq
   - Need for legal framework and curriculum development
   - Cultural resistance to new dispute resolution methods

2. Relevance and Importance of Anti-Corruption Efforts (Mentioned 9 times)
   - Corruption identified as the number one challenge in Iraq
   - Anti-corruption efforts seen as crucial for stability, security, and attracting foreign investment
   - Project perceived as highly relevant by both authorities and external stakeholders
   - Corruption identified as root cause of instability, lack of trust, and irregular migration

3. Project Recommendations (Mentioned 8 times)
   - Develop curriculum for law schools in collaboration with Ministry of Higher Education
   - Educate business community about arbitration benefits
   - Involve more Iraqi experts in project activities
   - Strengthen work with parliament and civil society
   - Improve project visibility and connections with local community
   - Focus on commercial arbitration in potential project extension

4. Project Achievements and Progress (Mentioned 7 times)
   - Support for strategic framework on anti-corruption
   - Adoption of Code of Conduct for judges
   - Progress in commercial arbitration component
   - Increased cooperation between institutions

5. Delays and Challenges (Mentioned 6 times)
   - Delays in legislative processes due to political sensitivity
   - Initial delays in commercial arbitration component due to lack of expertise
   - Challenges in engaging parliament and civil society
   - Weak civil society landscape in Iraq

6. Institutional Cooperation and Trust (Mentioned 5 times)
   - High level of trust and cooperation between UNDP and government institutions
   - Openness of Supreme Judicial Council to trial monitoring

7. Gender and Women's Empowerment (Mentioned 4 times)
   - Low participation of women in capacity building trainings
   - Need for more gender-sensitive approach in law revisions
   - Challenges due to male-dominated institutions

8. Sustainability and Exit Strategy (Mentioned 4 times)
   - Importance of working on legislative and strategic framework for long-term impact
   - Need for government budget commitment to continue trainings
   - Transfer of curricula and training of trainers planned

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[36] Due to the lower number of interlocutors and commitment around protecting anonymity, this part of the analysis will present themes broadly.

9. Civil Society Engagement (Mentioned 3 times)
   - Limited work with civil society organizations
   - Potential for increased cooperation with CSOs in anti-corruption efforts
   - Weak civil society landscape in Iraq

SWOT Analysis of Group 3 Interview Data

Strengths	Weaknesses
- High relevance of anti-corruption efforts in Iraq - Strong government ownership and institutional cooperation - Adoption of Code of Conduct for judges - Progress in commercial arbitration component - High level of trust between UNDP and government institutions - Support for strategic framework on anti-corruption	- Delays in legislative processes - Initial lack of expertise in commercial arbitration - Limited engagement with parliament and civil society - Low participation of women in capacity building trainings - Weak exit strategy and sustainability planning - Limited project visibility in the local community
Opportunities	Threats
- Potential for curriculum development in law schools and business schools about arbitration benefits - Increased cooperation with civil society organizations in anti-corruption efforts - Involving more Iraqi experts in project activities - Strengthening work with parliament - Potential project extension focusing on commercial arbitration - Developing a more gender-sensitive approach in law revisions	- Political sensitivity of anti-corruption efforts - Weak civil society landscape in Iraq - Cultural resistance to new dispute resolution methods (e.g., arbitration) - Male-dominated institutions hindering gender equality efforts - Potential lack of government budget commitment for continuing trainings - Possible instability in the political landscape affecting project impact

Annex 8. Main Documents Reviewed [37]

Key Strategic Documents
- Country programme document for Iraq (2020-2024)
- UNDP Strategic Plan 2022-2025
- Iraq UNSDCF 2020-2024
- Project document "Support to Justice Initiatives Curbing Corruption and Promoting Commercial Dispute Resolution"

Contextual Documents for Iraq
- Government Programme, Prime Minister's Office, Republic of Iraq, May 2020
- Transparency International, Corruption Perception Index 2023
- Control Of Corruption: Percentile Rank by Country
- UN Documents for Iraq: Secretary-General's Reports
- Addendum 1 to CA MIDEAST-2021-422-722
- Inception Report for EU ACAI

Methodological Guidance
- UNDP Handbook on Planning, Monitoring and Evaluating for Development Results
- UNDP Evaluation Guidelines, June 2021
- UNEG Ethical Guidelines for Evaluation
- UNDAF Companion Guidance, Programming Principles
- UNDP Gender Marker

Additional Documents
- ACAI PAC Strategy
- Iraq Judicial System and Grand Corruption Cases the Central Anti-Corruption Criminal Court Trial Monitoring Programme First Report (August 2022-July 2023)
- Iraqi Prosecutor Law No. 47 of 2017
- Iraqi Public Prosecutor Law No. 159 of 1979
- Newsletters on Anti-Corruption Initiatives in Iraq
- Revised ACAI Steering Committee Terms of Reference
- ACAI Narrative Reports: 4th January 2024 - March 2024; 30th April 2021 - 29th April 2022; 30th April 2022 - 31st December 2022; January 2023 - 8th October 2023
- Risk Log 2023

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[37] The list of sources presented in this annex, while not exhaustive, highlights the most pertinent documents that have substantially informed this evaluation.

Annex 9. SWOT Analysis of ACAI's Implementation

Strengths	Weaknesses
- Strong progress in several output areas, particularly Output 1 (legislative and strategic framework), Output 2 (justice sector capacity building), and Output 5 (training of civil society and media). - Successful establishment and operation of the trial monitoring program, exceeding targets for number of cases monitored. - Effective capacity building efforts, with targets met or exceeded for training of public officials, judges, prosecutors, and CoI officials. - Proactive adaptability in responding to emerging needs and adjusting implementation strategies. - Strong partnerships and coordination with government stakeholders, UN agencies, and international partners.	- Delays and limited progress in some output areas, particularly Output 3 (commercial dispute resolution), Output 4 (parliamentary engagement), and certain indicators under Output 5. - Challenges in achieving gender balance and women's participation targets. - Absence of a clear exit strategy and sustainability planning. - Reliance on a single donor (EU) for funding, posing risks to long-term financial sustainability. - Insufficient involvement of Iraqi experts in capacity building activities.
Opportunities	**Threats**
- High relevance and alignment of anti-corruption efforts with government priorities, providing an enabling environment for project interventions. - Potential for increased government ownership and resource allocation to sustain project outcomes. - Engaged civil society and media networks as partners in promoting transparency and accountability. - Expanding collaboration with academic institutions to integrate anti-corruption in educational curricula. - Positive initial results in trial monitoring and capacity building provide a foundation to scale up these interventions.	- Persistent political instability that could undermine long-term project impact and sustainability. - Resistance to reform from some stakeholders benefiting from the status quo of corruption. - Deteriorating security conditions impeding project implementation and staff safety. - Weak civil society landscape and limited space for their engagement in anti-corruption efforts. - Sociocultural barriers to gender equality and women's participation in anti-corruption efforts.

Annex 10. Comprehensive Analysis of Project Output Progress

Output 1: Improved Legislative and Strategic Framework for Anti- Corruption

In summary, Output 1 has shown strong progress, with over 80% achievement in 3 out of the 5 indicators. The remaining indicators are on track to be measured or fully achieved by the end of the project.

i) # of anti-corruption legislative document containing compliance indicators with international norms drafted or reviewed

- Total target: 16
- Cumulative achievement: 11 out of 16 (68.75% achieved)
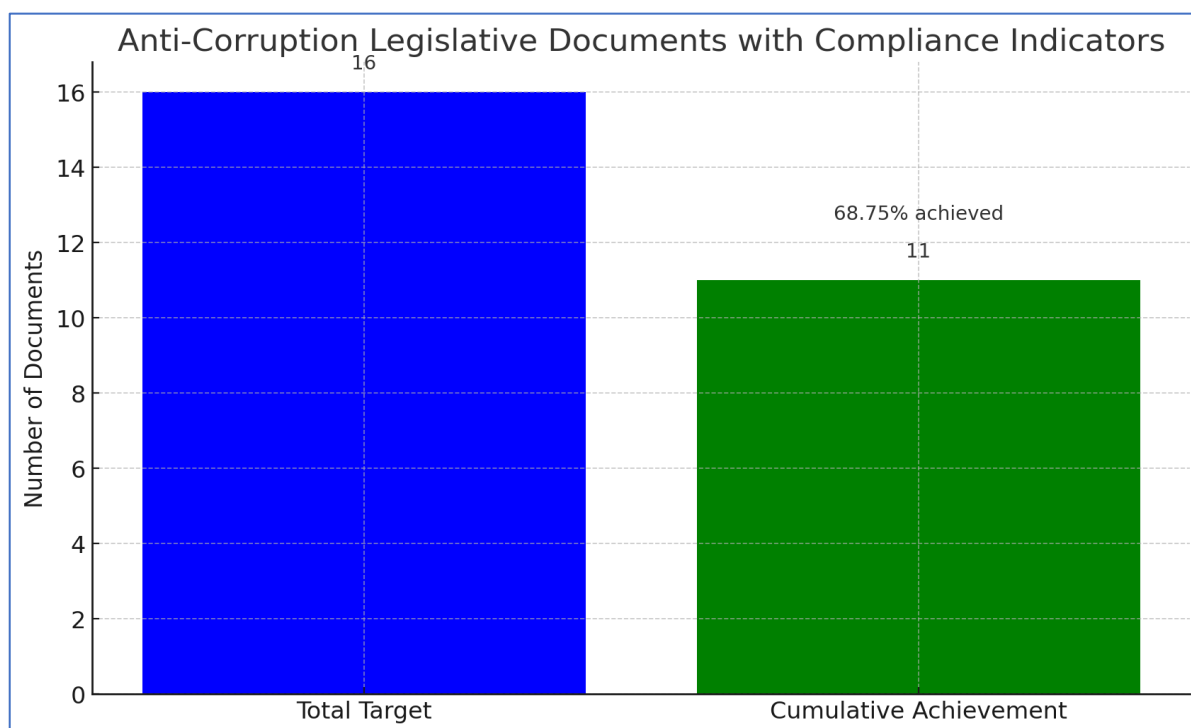
Progress by reporting period:

April 2021 - April 2022 (Year 1): The report states that 4 anti-corruption draft laws were reviewed during this period, namely the federal Access to Information Draft Law, the federal draft Penal Code (anti-corruption provisions only), the KRI Shura Council Draft Law, and the KRI Judicial Oversight Authority Draft Law.

April 2022 - December 2022: The report mentions that 2 additional laws were reviewed during this period: the Code of Criminal Procedure and the draft law on Conflict of Interest.

January 2023 - October 2023: The report indicates that 4 more draft laws/regulations were reviewed:
- Access to Information bill (second review)
- Draft bill on asset recovery
- Draft public procurement law
- Public Procurement Legal Framework and the Draft Law on Government Contracts

January 2024 - March 2024: The report mentions that 1 draft law on "Asset Recovery" was reviewed during this period.

Based on the analysis of reports, a total of 11 anti-corruption legislative documents containing compliance indicators with international norms have been drafted or reviewed as of March 2024. This represents a 68.75% completion rate against the total target of 16 documents.

ii) Number of anti- corruption legislative documents submitted for adoption by the Council of Ministers or the Parliament

- Total target: 8
- Cumulative achievement: 7 out of 8 (87.5% achieved)

Anti-Corruption Legislative Documents Submitted for Adoption

Percentage Achieved: 87.50%
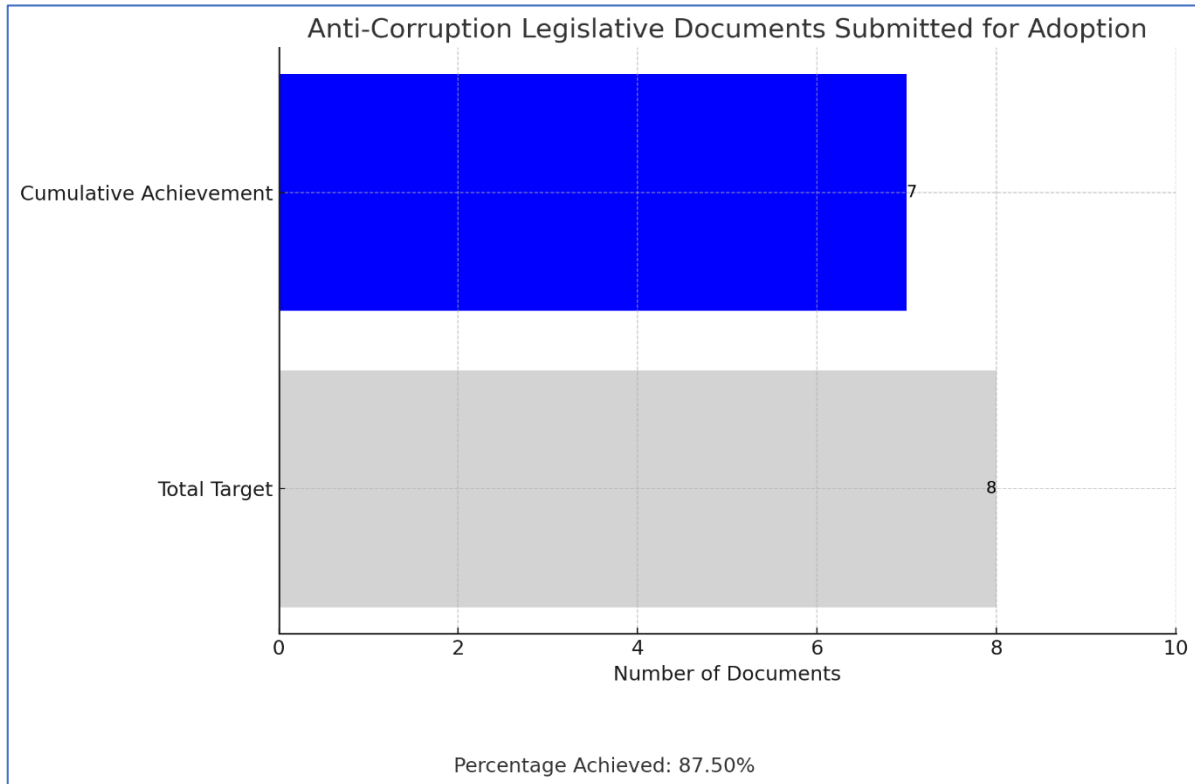
Progress by reporting period:

April 2021 - April 2022: No anti-corruption legislative documents were reported as submitted for adoption in this period. The narrative report for this timeframe mentions that reviews were conducted on 4 draft laws (Access to Information, Penal Code provisions, KRI Shura Council, KRI Judicial Oversight Authority) but they had not yet been submitted for adoption.

April 2022 - December 2022: 3 anti-corruption legislative documents were submitted for adoption in this period.

January 2023 - October 2023: 2 additional anti-corruption legislative documents were submitted:
1) Access to Information Law - approved by Council of Ministers in October 2023
2) Public Procurement Law - a revised draft incorporating UNDP recommendations was sent to State Council for further review after a workshop

January 2024 - March 2024: 2 more legislative documents progressed:
1) The Council of Ministers formally approved the draft Arbitration Law in February 2024, initiating the process in the Council of Representatives.
2) The Asset Recovery law draft is undergoing review.

In total, based on the analysis of narrative reports, 7 out of the targeted 8 anti-corruption legislative documents were submitted for adoption to the Council of Ministers or Parliament by March 2024. This represents a nearly 88% completion rate against the total target.

iii) # of public officials trained on legislative drafting, reviewed laws, related international standards, AC strategies, AC legislative assessment, and corruption risk assessment (Disaggregated by type & gender)

- Total target: 955 public officials (236 women)
- Cumulative achievement: 1,042 officials trained (263 women), which is 109% of the total target and 111% of the women's target.

Public Officials Trained on Anti-Corruption Measures (Updated Data)

Percentage Achieved (Total): 109.11%, Percentage Achieved (Women): 111.44%
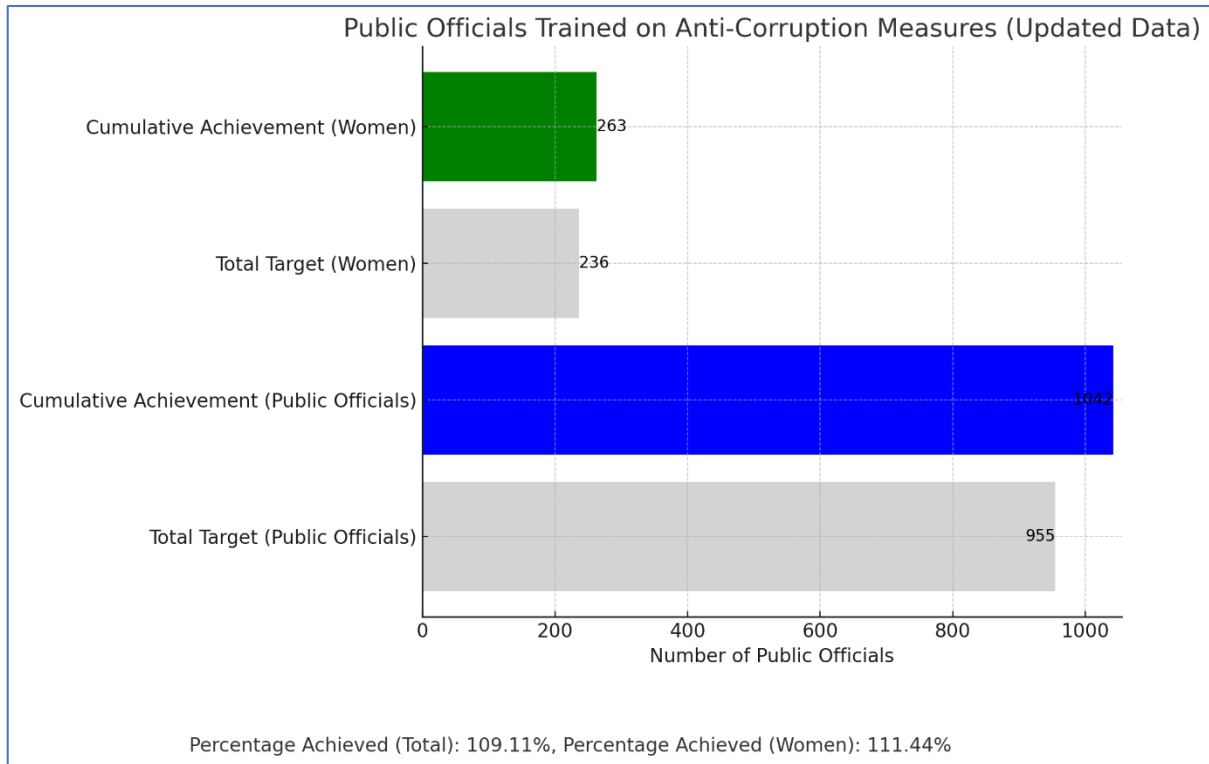
Progress by reporting period:

April 2021 - April 2022: 282 public officials were trained, out of which 25% were women (approximately 71 women). The trainings covered topics like legislative drafting, reviewed legislation, international standards, AC strategies, AC legislative assessment, and corruption risk assessment.

April 2022 - December 2022: 306 additional public officials were trained, out of which 96 were women. This brings the cumulative total to 588 public officials trained, including approximately 167 women.

January 2023 - October 2023: 434 more public officials were trained, out of which 96 were women. The cumulative total now stands at 1,022 public officials trained, including around 263 women.

January 2024 - March 2024: 20 additional public officials were trained. The gender breakdown was not provided for this period.

In summary, at least 1,042 public officials have been trained against the target of 955, which is an achievement rate of over 100%. Regarding women's participation, at least 263 women were trained against the target of 236, which is also an achievement rate exceeding.

iv) % of trained officials utilizing learned skills at the workplace

- Total target: 40%
- Cumulative achievement: Not yet tracked, a study is planned to measure this indicator.

Progress by reporting period:

April 2021 - April 2022: No data was reported for this indicator. The report mentions "A study is planned to track this indicator and will be reported in next quarter."

April 2022 - December 2022: No specific data was provided. The report states "A study is planned to track this indicator and will be reported in next quarter."

January 2023 - October 2023: The report mentions "A study is planned to track this indicator and will be reported in next quarter." However, no actual percentage is provided.

January 2024 - March 2024: The report states "This is going to be traced during the mid-term evaluation." No concrete data is available.

Based on the provided information, the project has not yet reported the actual percentage of trained officials utilizing their learned skills at the workplace. The reports consistently mention that a study is planned to track this indicator, but no results have been produced so far.

- Rating scale: [1 = existence of Anti-Corruption Strategy (ACS); 2 = implementation of ACS designed & tested; 3 = ACS fully implemented]
- Total target: Level 3 (ACS fully implemented)
- Cumulative achievement: Level 3 (ACS fully implemented) - 100% achieved

Level of Progress towards the Implementation of Anti-Corruption Strategies
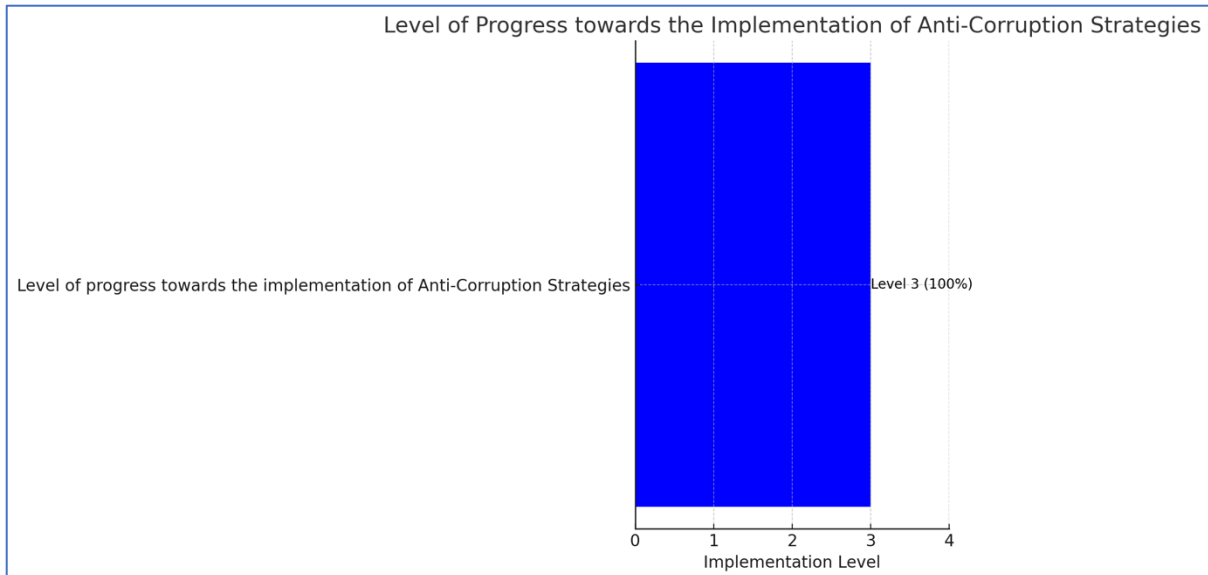
Progress by reporting period:

April 2021 - April 2022: The report indicates that the Federal and KRI Anti-Corruption Strategies were adopted, published, and disseminated, which corresponds to Level 1 on the rating scale.

April 2022 - December 2022: The progress is at Level 2, as reported: "Federal and KRI implementation plans, and oversight mechanisms adopted, and 2 reports issued by CoIs on the implementation of the Anti-Corruption Strategies."

January 2023 - October 2023: The report states that the progress has reached Level 3, indicating that the Anti-Corruption Strategies are now fully implemented.

January 2024 - March 2024: The report confirms that the progress remains at Level 3, with the Anti-Corruption Strategies fully implemented.

Based on the analysis, the project has successfully achieved its target of fully implementing the Federal and KRI Anti-Corruption Strategies (Level 3 on the rating scale). The progress was gradual, moving from the adoption and dissemination of the strategies (Level 1) to the design and testing of implementation plans and oversight mechanisms (Level 2), and finally to the full implementation of the strategies (Level 3).

Output 2: The justice sector, lawyers and CoI are better equipped to process corruption offenses due to (2.1.) improved technical skills relevant for corruption investigation, prosecution, adjudication and (2.2.) improved integrity rules of the justice sector

Output 2 demonstrates significant progress, with targets exceeded in case monitoring, training, and SOP development. Enhancement of codes of conduct for judiciary, CoIs, bar associations, and parliaments shows partial progress, requiring further efforts to fully achieve intended outcomes.

i. Level of progress in developing and implementing a trial monitoring programme Rating scale: [1 = no trial monitoring program (TMP); 2 = TMP developed; 3 = TMP operational and reviewed 4 = TMP fully implemented]

- Total target: Level 4 (TMP fully implemented)
- Cumulative achievement: Level 4 (TMP fully implemented) - 100% achieved
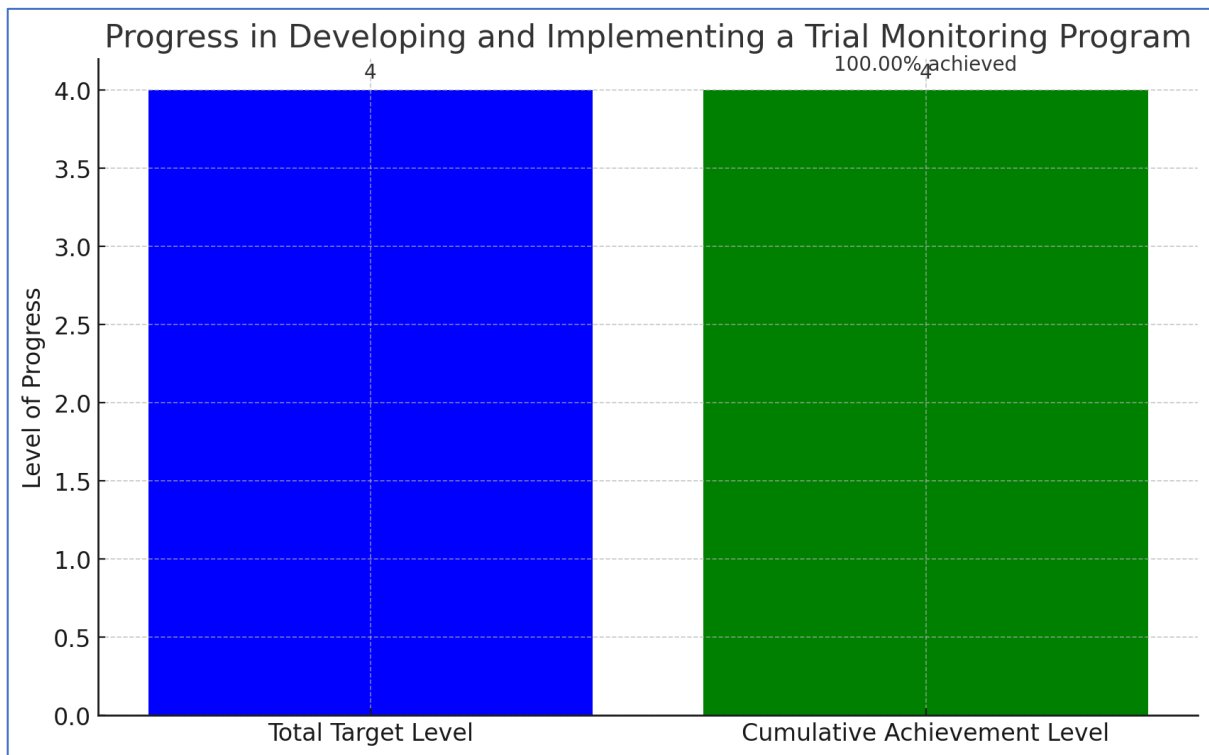
Progress by reporting period:

April 2021 - April 2022: The report indicates that the trial monitoring has been developed, which corresponds to Level 2 on the rating scale. It mentions that UNAMI Human Rights Office and UNDP signed an MoU for the trial monitoring portfolio, and the recruitment of staff for the trial monitoring unit was ongoing.

April 2022 - December 2022: The progress has reached Level 3, as the report states that the trial monitoring is now operational and being reviewed. The trial monitoring team has been monitoring cases and reviewing verdicts in both Federal Iraq and the Kurdistan Region of Iraq (KRI).

January 2023 - October 2023: The report confirms that the progress remains at Level 3, with the trial monitoring operational and under review. The team continues to monitor cases and review verdicts in Federal Iraq and KRI.

January 2024 - March 2024: In this period, the report indicates that the progress has reached Level 4, meaning the trial monitoring is now fully implemented. The team is actively monitoring cases, collecting verdicts, and organizing workshops with key stakeholders to enhance collaboration and understanding.

Based on the analysis, the project has successfully achieved its target of fully implementing the trial monitoring (Level 4 on the rating scale). The progress was gradual, moving from the development of the program (Level 2) to its operation and review (Level 3), and finally to its full implementation (Level 4).

- Total target: 120 cases by CACC and 30 cases by other courts
- Cumulative achievement: 259 cases by CACC (215.8% achievement rate) and 103 cases by other courts (343.3% achievement rate)
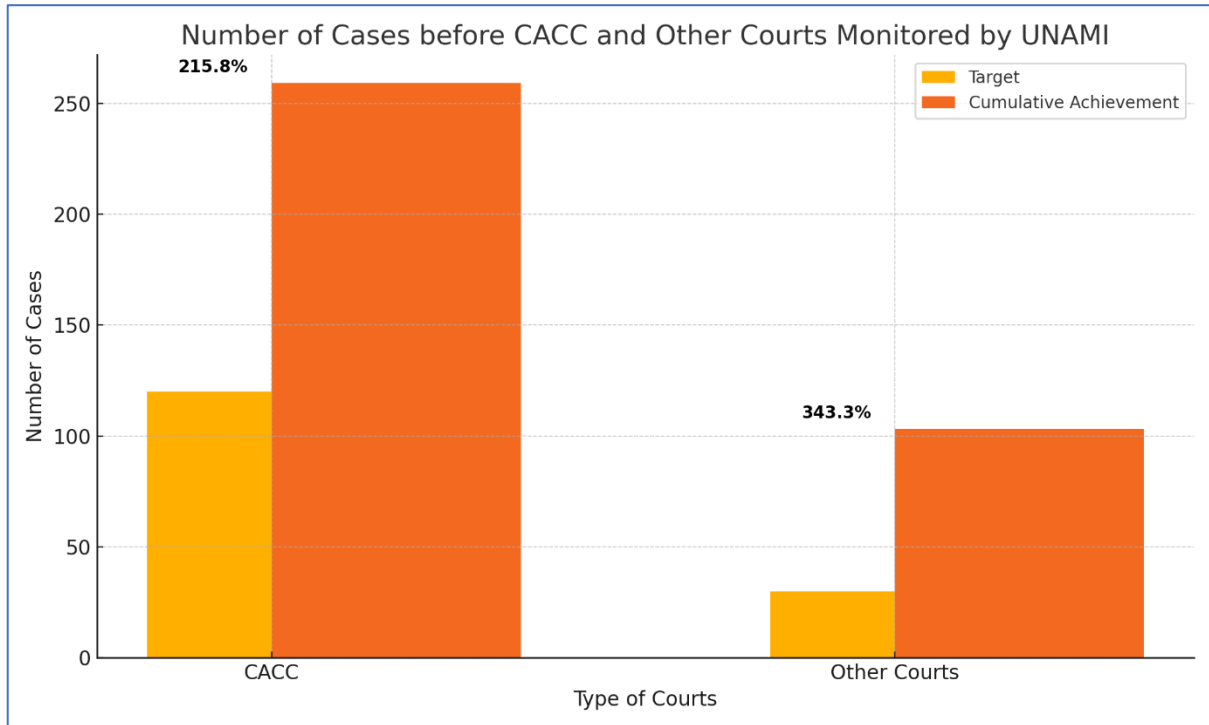
Progress by reporting period:

April 2021 - April 2022: No cases were reported as monitored during this period, as the trial monitoring progam was still in the development phase.

April 2022 - December 2022: The report states that 109 cases were monitored during this period, out of which 86 were before the CACC in Baghdad, and 23 were in the Kurdistan Region of Iraq (KRI) courts. Additionally, 116 cases were reviewed from old files.

January 2023 - October 2023: In this period, 181 new cases were monitored, with 117 cases before the CACC in Baghdad and 64 cases before the courts in KRI.

January 2024 - March 2024: The report indicates that 72 new cases were monitored during this quarter, with 56 cases before the CACC and 16 cases in KRI courts.

Based on the analysis, the project has surpassed its target for both CACC and other courts. As of March 2024, a total of 259 cases have been monitored by CACC against the target of 120 cases, representing a 215.8% achievement rate. For other courts, 103 cases have been monitored against the target of 30 cases, representing a 343.3% achievement rate.

iii) # of judges, prosecutors and CoI officials (federal and KRI) trained on 15 out of 45 investigation and adjudication subjects identified in the inception report (Disaggregated by participants and subject type)

- Total target: 280 officials trained on 15 subjects
- Cumulative achievement: 345 officials trained on 12 subjects
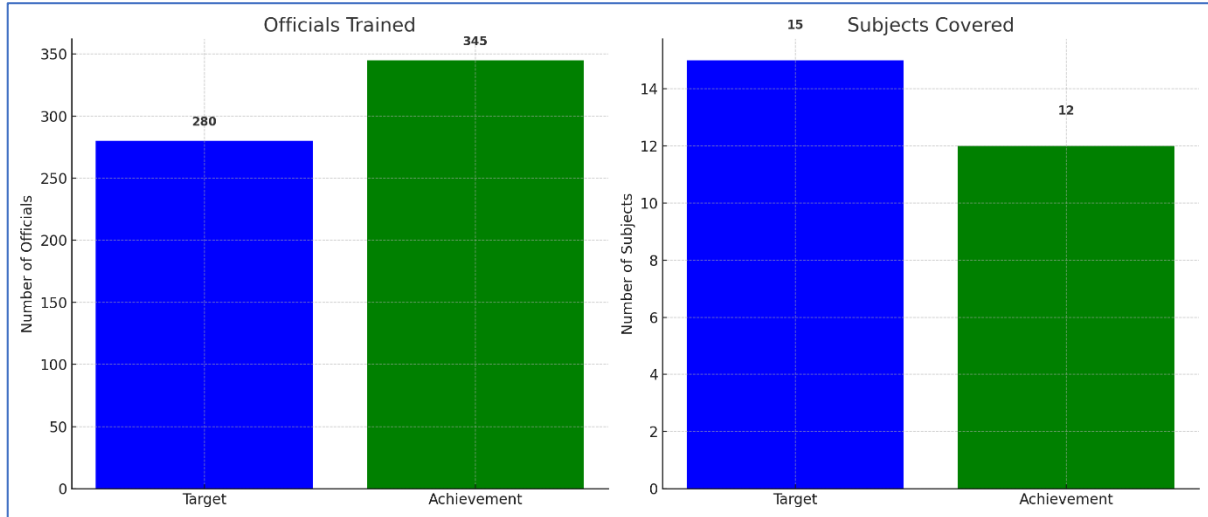
Progress by reporting period:

April 2021 - April 2022: No specific numbers were reported for this indicator during this period. The report mentions that a training needs assessment was completed, identifying 45 courses needed for the federal level and 38 courses for the KRI level. Two separate training sessions were conducted for 50 members of the judiciary, investigative judges, and prosecution offices in Baghdad and Erbil.

April 2022 - December 2022: The report states that 289 officials were trained on an average of 5 subjects during this period. The trainings covered topics such as judicial independence & impartiality, investigation techniques and methods, illicit enrichment, rights of the suspect and the accused, standards of proof in criminal investigations, and evidence processing and gathering.

January 2023 - October 2023: No additional information was provided for this specific indicator in the report for this period.

January 2024 - March 2024: The report indicates that 56 officials were trained on 3 different subjects during this quarter. The cumulative total now stands at 345 officials trained on an average of 12 subjects.

Based on the analysis, the project has made significant progress in training judges, prosecutors, and CoI officials on various investigation and adjudication subjects. As of March 2024, a total of 345 officials have been trained on an average of 12 subjects, surpassing the target of 280 officials trained.

However, there is a lack of clarity regarding the exact number of subjects covered in the trainings. The target specifies training on 15 out of 45 identified subjects, but the reports mention an average of 5 and 12 subjects covered in different periods.

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- Total target: 10 SOPs (6 for investigations, 4 for background checks and vetting)
- Cumulative achievement: 16 SOPs drafted (160% of total target achieved)
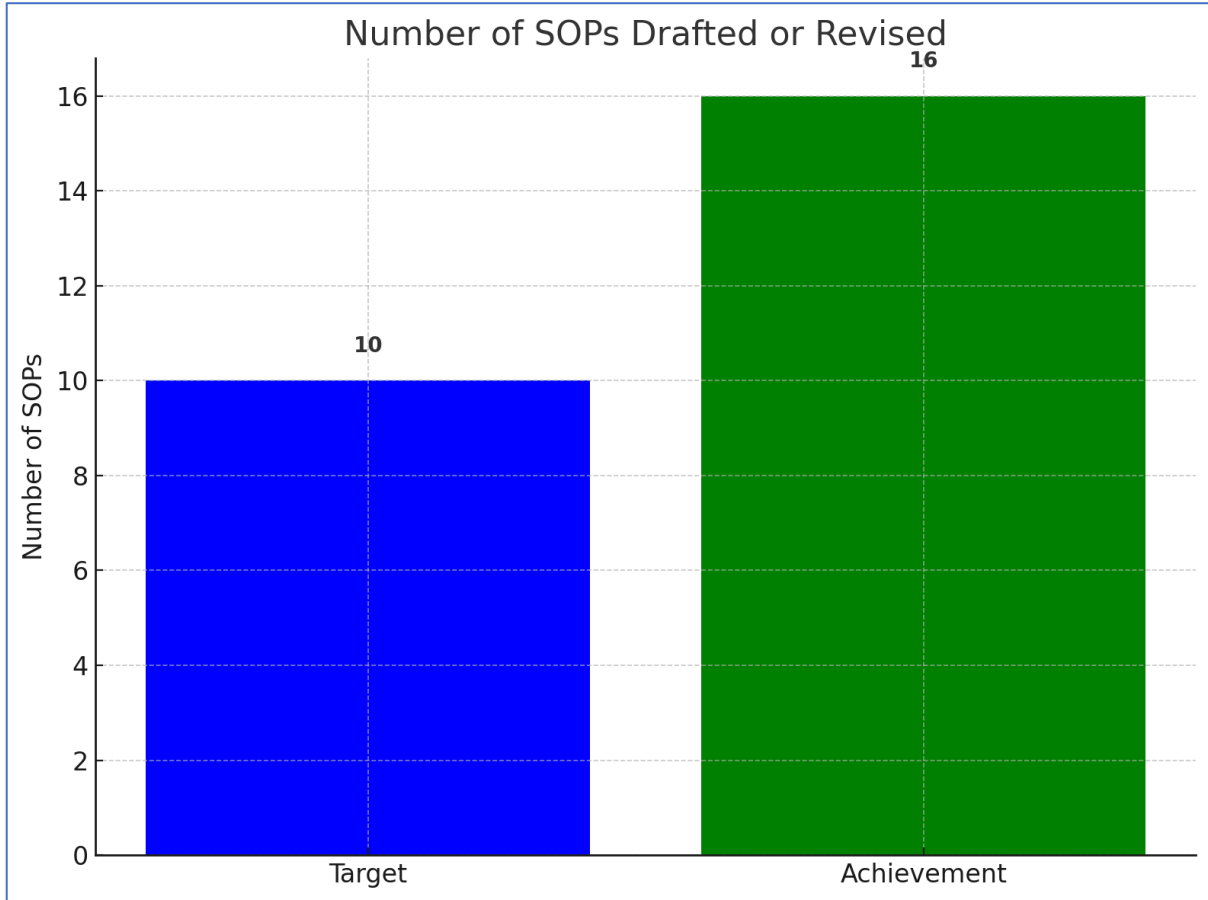
Progress by reporting period:

April 2021 - April 2022: No progress was reported on this indicator during this period. The report mentions that this activity is planned for Year 2 and beyond.

April 2022 - December 2022: The report states that no progress was made on this indicator, as it is linked to the mentoring component, which will identify investigation challenges that require SOPs.

January 2023 - October 2023: The report indicates that the development of SOPs is still in progress. UNDP has received the SOPs on investigations from both KRI and Federal Commissions of Integrity and is currently reviewing them. Two workshops are planned in the next quarter to initiate the process of modifying/redrafting the SOPs.

January 2024 - March 2024: Significant progress was reported during this quarter. The project has started creating a comprehensive manual and SOPs for digital forensics. A Digital Forensics Manual was drafted, outlining the principles, procedures, and best practices for digital forensic investigations. Additionally, a suite of 16 SOPs was developed,

covering detailed steps for several types of devices and forensic procedures. These SOPs and manual are currently being translated into Arabic.

Based on the analysis, the project has made substantial progress in drafting and revising SOPs, particularly in the area of digital forensics. The development of a comprehensive manual and 16 SOPs for digital forensics is a significant achievement, as it addresses a crucial aspect of modern corruption investigations. However, the reports do not provide a clear breakdown of the SOPs drafted or revised for background checks and vetting of judges upon entry and their promotion. To fully assess the progress on this indicator, more information is needed on the specific number of SOPs developed for each category (investigations and background checks/vetting) and the sectors they cover.

V) Level of progress towards enhancement of codes of conduct (integrity rules) for the federal and KRI judiciaries, CoIs and bar associations, (3 federal and 3 KRI). Rating scale: [1 = consultation process; 2 = design of process and outcome; 3 = adoption & implementation; 4 = improvement of outcome]

-   Total target: 6 codes of conduct approved, reviewed, revised, with training manuals and training conducted
-   Cumulative achievement: Federal code of conduct published and adopted (partial achievement, progress made but target not fully met)

Progress by reporting period:

April 2021 - April 2022: The report indicates that the consultation process (Level 1) has been completed, and codes have been drafted. Two workshops were delivered separately for KRI and Federal judiciaries to develop comprehensive codes of conduct. As a result, the Task and Finish Committees from both regions have drafted their codes, which will be validated and reviewed in the upcoming months.

April 2022 - December 2022: The progress has reached the design of process and outcome (Level 2). The Federal Code of Conduct has been published and adopted, while the KRI Code of Conduct has been drafted for the Judiciary and submitted for adoption.

January 2023 - October 2023: The report does not provide specific information on the progress of this indicator for this period.

January 2024 - March 2024: The progress has reached the improvement of outcome stage (Level 4). The report highlights several key achievements:
-   The Code of Conduct for Subject Matter Experts before the Judiciary was unanimously adopted by the Supreme Judicial Council in January 2024.
-   UNDP ACAI is planning the inaugural workshop on the Code of Conduct for Subject Matter Experts before the Judiciary, scheduled for June 2024.
-   UNDP ACAI has conducted workshops reaching nearly one-third of the total number of judges, including specialized workshops for female judges.
-   An online course on the Code of Conduct was developed in collaboration with the Supreme Judicial Council and is undergoing final stages of development.
-   The Code of Conduct for KRI CoI investigators was finalized and submitted to the KRI CoI for review.

Based on the analysis, the project has made significant progress in enhancing the codes of conduct for the federal and KRI judiciaries, CoIs, and bar associations. The adoption of the Code of Conduct for Subject Matter Experts, the extensive training workshops conducted, and the development of an online course demonstrate the project's efforts to improve the integrity rules within the justice sector.

While the reports do not explicitly state the number of codes of conduct approved, reviewed, and revised, the progress achieved suggests that the project is well on track to meet its target of enhancing 6 codes of conduct. The ongoing initiatives, such as the planned workshop on the Code of Conduct for Subject Matter Experts and the review of the KRI CoI investigators' Code of Conduct, indicate a strong commitment to further enhancing the integrity rules across the justice sector.

vii) Level of progress towards adopting & implementing codes of conduct for Parliaments (1 federal and 1 KRI) [Rating scale: 1= Consultation on drafting process; 2= Drafted Code of Conduct; 3= Code of Conduct submitted for approval & training on code of conduct; 4= training on code of conduct]

- Total target: 2 codes of conduct drafted, submitted for approval, with training for 60 KRI and 140 federal parliament members
- Cumulative achievement: Drafts of codes of conduct prepared (Level 2 achieved, partial progress made towards target)

Progress by reporting period:

April 2021 - April 2022: The project conducted an assessment titled "Codes of Conduct for Parliamentarians - A Comparative Study" to get an overview of the existing situation. Consultations were held with the federal and KRI Parliaments to assess the status of current rules of conduct. The project will coordinate with relevant departments to establish a code of conduct committee to help draft or update the codes.
Progress: 1 = Consultation on drafting process completed

April 2022 - December 2022: The KRI Parliament confirmed an initial draft code of conduct exists that needs further development. They agreed to share the final draft with UNDP for expert review. UNDP is following up with the federal parliament to work on their code of conduct. Relevant activities will be implemented in 2023.
Progress: 1 = Consultation on drafting process

January 2023 - October 2023: UNDP reviewed the KRI Parliament's draft code of conduct but did not share results with the parliament after their term extension was ruled unconstitutional. The reviewed code will be shared once new MPs form the parliament after elections. For the federal parliament, a meeting was held with the Integrity Committee. The committee agreed to share a draft code with UNDP for review and feedback. Training for the drafting committee is also planned.
Progress: Drafted Code of Conduct

January 2024 - March 2024: The project engaged an international expert to work with parliament on comprehensively reviewing and enhancing the codes of conduct to ensure compliance with international standards. Further improvements are expected in the coming months.
Progress: Drafted Code of Conduct

In summary, over the project period, draft codes of conduct were developed for both federal and KRI parliaments through a consultative process, but have not yet been finalized, submitted for approval or had training conducted. The cumulative progress reached "Drafted Code of Conduct" (level 2 out of the 4 level scale). The project has not yet fully achieved its total targets of having the codes submitted for approval and providing training to 60 KRI and 140 federal parliament members.

Output 3: Enhanced legislation, institutions, and capacity for commercial dispute resolutions

In summary, Output 3 shows mixed progress. While targets related to training and knowledge improvement have been met or exceeded, progress on legislation drafting, adoption, and efficiency improvement through SOPs is lagging. Awareness campaigns also require further efforts to fully achieve the intended targets.

i) # of drafted or revised legislation[38] or regulation compatible with best practices

- Total target: 16
- Cumulative achievement: 8 (50%)

Number of Legislation or Regulation Drafted or Revised
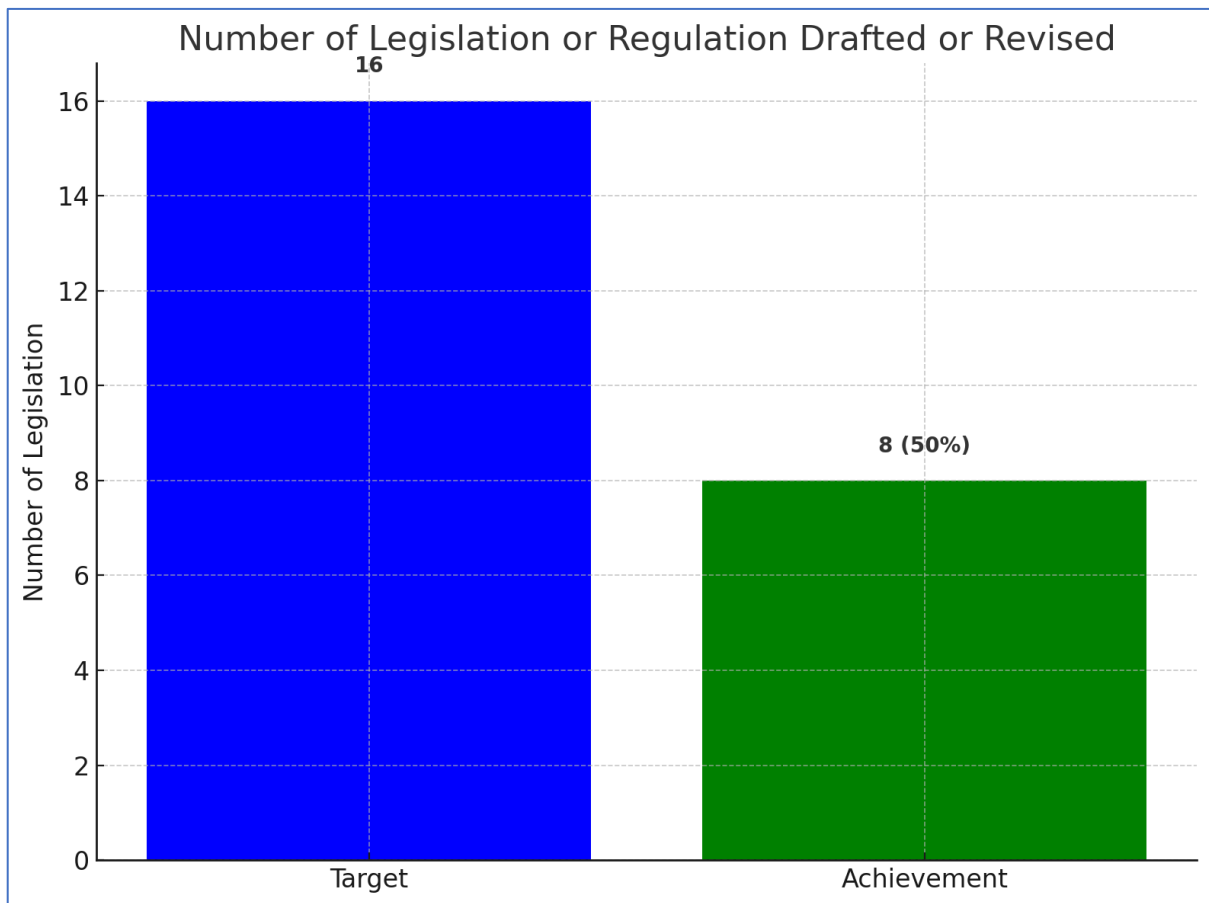
Progress by reporting period:

April 2021 - April 2022: Reviewed and drafted 3 laws: Arbitration Bill (3 versions), advocacy paper and legislative proposal to encourage Iraq joining the Singapore Convention, and the commercial law regarding amending the definition and list of commercial activities.

April 2022 - December 2022: - No additional progress reported.

January 2023 - October 2023: Revised the 2nd and 3rd versions of the Arbitration Bill. Revised the Trade Law.

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38 Number of legislation or regulations is not meant to be a full law, it can be only a few articles of a law

154

January 2024 - March 2024: No additional progress reported.

In summary, over the project period, a total of 8 legislation or regulations were drafted or revised to be compatible with best practices. This is short of the total target of 16 set for this indicator. The majority of the progress (5 out of 8) was made in Year 1, with some additional progress (3 out of 8) in Year 3. No further legislation or regulations have been drafted or revised in the upcoming timeframe.

ii) # of adopted laws by Council of Ministers or Parliament or adopted regulations by concerned public institutions

- Total target: 12 adopted laws or regulations
- Cumulative achievement: 1 (8.33% of total target achieved)
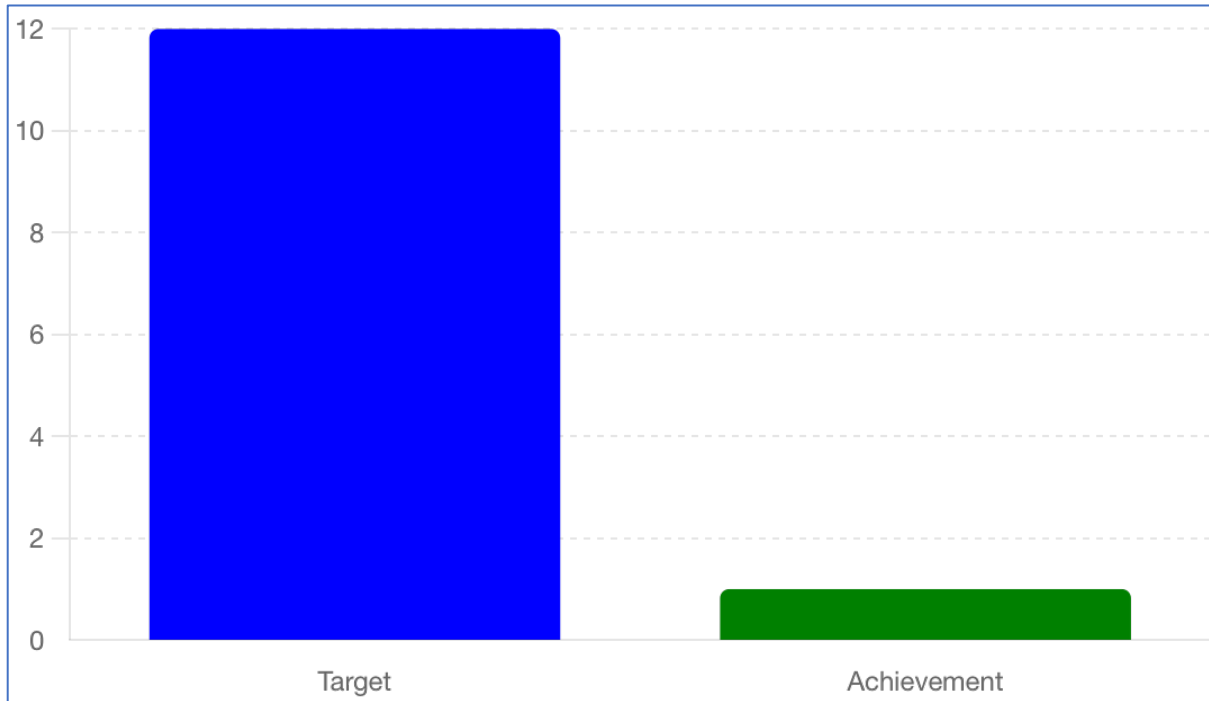
Progress by reporting period:

April 2021 - April 2022: No laws or regulations reported as adopted.

April 2022 - December 2022: No laws or regulations reported as adopted.

January 2023 - October 2023: No laws or regulations reported as adopted.

January 2024 - March 2024: The Council of Ministers approved the draft Arbitration Law in February 2024. The draft will now go to the Council of Representatives for deliberations as part of the legislative process.

In summary, over the project period up to March 2024, 1 law (the draft Arbitration Law) was approved by the Council of Ministers but is still pending adoption by Parliament. No other laws or regulations were reported as fully adopted. This falls short of the total target of 12 adopted laws or regulations set for this indicator. The project narrative indicates ongoing efforts to get the draft Arbitration Law through the full legislative process in Parliament. However, as of the latest reported quarter (January-March 2024), the target of 12 adopted laws or regulations has not been met.

iii) increased efficiency of courts and enforcement department through reduction in the number of procedures and time (duration) needed to enforce arbitral awards

- Total target: 2 preliminary assessments and 4 SOPs developed and revised over the project's period to decrease time and procedures needed for enforcement
- Cumulative achievement: 4 preliminary assessments conducted (200% of assessment target achieved), no progress reported on SOPs
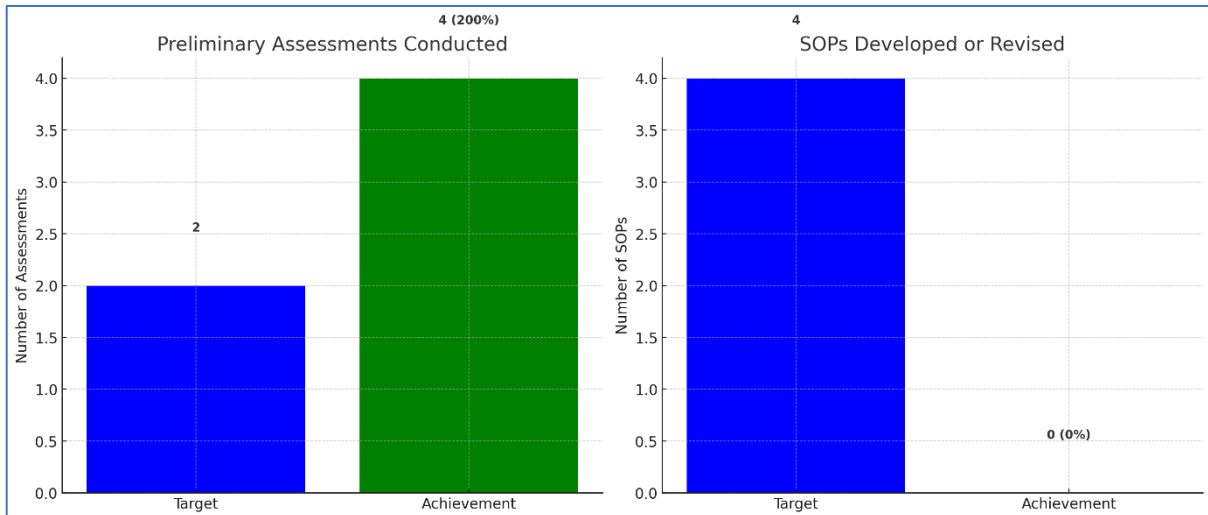
Progress by reporting period:

April 2021 - April 2022: 3 preliminary assessments conducted: Federal Commercial Court, KRI Commercial Court and Court of First Instance, and Enforcement Departments.

April 2022 - December 2022: No additional progress reported.

January 2023 - October 2023: A Resource Needs Assessment of civil/commercial courts within the judiciary was conducted. The assessment identified areas where efficiency of adjudication of commercial cases can be improved.

January 2024 - March 2024: No progress reported on development or revision of SOPs.

In summary, over the project period up to March 2024, a total of 4 preliminary assessments were conducted to identify areas for increasing efficiency of courts and enforcement departments. This meets and slightly exceeds the target of 2 preliminary assessments. However, the reports do not indicate that any Standard Operating Procedures SOPs were developed or revised to actually implement changes to decrease time and procedures needed for enforcement of arbitral awards. The target of developing and revising 4 SOPs was not met. The assessments have laid the groundwork by identifying areas for improvement, but the project has not yet reported progress on translating these into concrete procedural changes through SOPs.

IV) improved knowledge among arbitrators, judges and other types of trainees through awareness workshops and training
  - **A. Knowledge improvement to commercial ADR obtained through training (Pre- & Post Assessments)**
  - **B. # of training programs and workshop s provided**
  - **C. # of trainees disaggregated by gender**
  - **D. # of awareness /public educational campaigns conducted**

Progress by reporting period:

A. Knowledge improvement to commercial ADR obtained through training Pre-& Post Assessments

April 2021 - April 2022: One 3-day workshop delivered for 25 participants from government, civil society, and academia with 89% improvement in participants' knowledge and skills.

In summary, the project has reported exceeding its target of 70% improvement in knowledge and skills, with a cumulative achievement of 75% improvement. However, specific knowledge improvement percentages were only reported for Year 1 89%. Subsequent reports do not provide percentages for individual training events.

B. # of training programs and workshops provided
- Total target: 26 training workshops

April 2021 - April 2022: 1 workshop delivered 3-day workshop for 25 participants from government, civil society, and academia

April 2022 - December 2022: 1 workshop delivered

January 2023 - October 2023: 3 workshops delivered: workshop on New York Convention for judges and heads of enforcement departments; two workshops on New York Convention for lawyers and members of Iraqi Bar Association and Kurdistan Bar Association

January 2024 - March 2024: 5 workshops/training programs delivered: workshop on New York Convention for Women Judges Association; workshop for lawyers of Ministry of Justice; International Commercial Negotiation & Mediation Training and Practice Program in Baghdad; International Commercial Negotiation & Mediation Training and Practice Program in

In summary, the project has delivered a total of 10 training workshops over the reporting period, which is 38.46% of the total target of 26 workshops. Progress was relatively slow in the first two years with only 2 workshops conducted. The pace increased in Year 3 with 3 more workshops. The most substantial progress was made in the reported quarter of Year 4, with 5 workshops conducted, doubling the cumulative total.

At the current cumulative total of 10 workshops, the project is still 16 workshops short of its total target, with 61.54% of the targeted workshops remaining to be conducted. Significant acceleration in the pace of workshop delivery would be needed in the remaining period to fully achieve the target of 26 workshops.

C. # of trainees disaggregated by gender
- Total target: 270 (54 women)

April 2021 - April 2022: 25 participants (8 women) in the 3-day workshop

April 2022 - December 2022: 20 participants (13 women) in the reported workshop

January 2023 - October 2023: 63 participants (22 women) across the 3 reported workshops.

January 2024 - March 2024: workshop on New York Convention for Women Judges Association: 29 women; Workshop for lawyers of Ministry of Justice: 9 participants gender breakdown not specified; International Commercial Negotiation & Mediation Training and Practice Program in Baghdad and Sulaymaniyah: no participant numbers reported; Workshop as part of the Riyadh International Disputes Week: small delegation of Iraqi officials, no specific numbers; Trainees in this quarter: 38 (29 women minimum) based on available data;

In summary, based on the available data, the project has trained a minimum of 146 individuals, of whom at least 72 are women. This represents 54.07% of the total trainee target of 270 and exceeds the target of 54 women trainees.

However, there are some data gaps in the 4th report, with no specific participant numbers provided for some of the workshops. The actual total number of trainees is likely higher than 146. If complete participant data was available for all workshops, the project would likely be closer to or potentially exceeding its overall trainee target.

D. # of awareness/public educational campaigns conducted
-    Total target: 3 public educational campaigns

April 2021 - April 2022: 0 campaigns conducted

April 2022 – December 2022: 0 campaigns conducted

January 2023 - October 2023: No update provided on this indicator

January 2024 - March 2024: 1 campaign conducted

Against the total target of conducting 3 public educational campaigns, 1 campaign has been conducted so far based on the latest report. The project seems behind track on fully achieving this target, having completed 1 out of the targeted 3 campaigns. More campaigns would need to be conducted in the remaining project period to meet the total target.

Output 4: Create a climate of support in Parliament for anti-corruption reforms

Output 4 demonstrates limited progress. While some information sessions have been held, particularly at the federal level, the overall achievement is well below the intended targets. The quarterly forum meetings, aimed at bringing together key stakeholders, have not yet been implemented according to the reports.

A) # of information sessions held for members of Parliament and their staff to promote knowledge on anti-corruption international standards and Parliamentary integrity. (Disaggregated by type of parliament)

- Total target: 14 information sessions (7 for federal and 7 for KRI)
- Cumulative achievement: 4 information sessions (3 for federal and 1 for KRI) (28.57% of total target achieved, 42.86% of federal target and 14.29% of KRI target achieved)
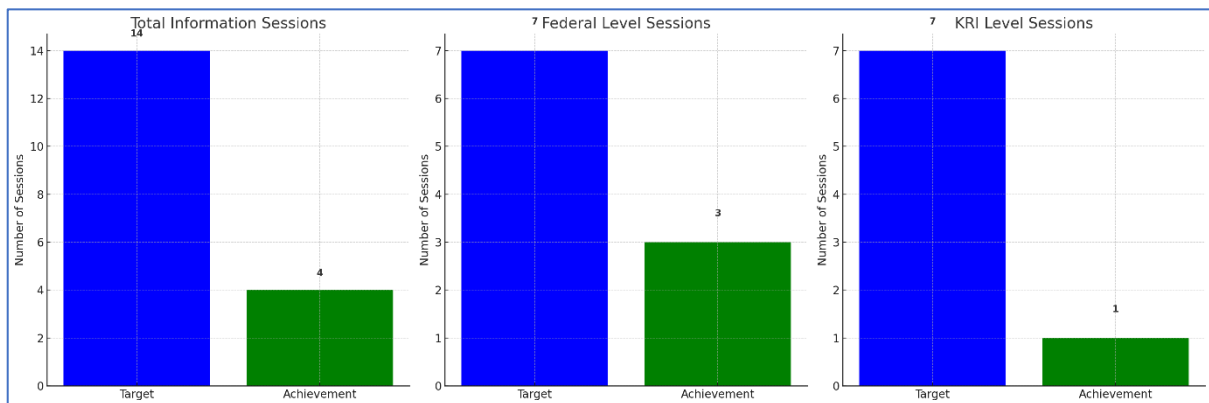
Progress by reporting period:

April 2021 - April 2022: 2 information sessions (1 for federal and 1 for KRI)

April 2022 – December 2022: 0 information sessions

January 2023 – October 2023: 1 information session

January 2024 - March 2024: 1 information session (for KRI parliament)

Cumulative achievement: 4 information sessions (3 for federal and 1 for KRI)

Against the total target of conducting 14 information sessions (7 each for federal and KRI parliaments), only 4 sessions have been conducted so far based on the cumulative progress reported - 3 for the federal parliament and 1 for the KRI parliament.

The data shows that it is may be unlikely that the project will meet the total target, as 10 more sessions would need to be organized in a short timeframe. The progress has been particularly slow on sessions for the KRI parliament compared to the federal one. Increased efforts and resources may need to be directed to enable more sessions, especially for the KRI parliament, in order to get closer to the overall target by project completion.

- Total target: 12 forum meetings (5 at federal and 5 at KRI level)
- Cumulative achievement: 0 forum meetings (0 at federal level and 0 at KRI level)
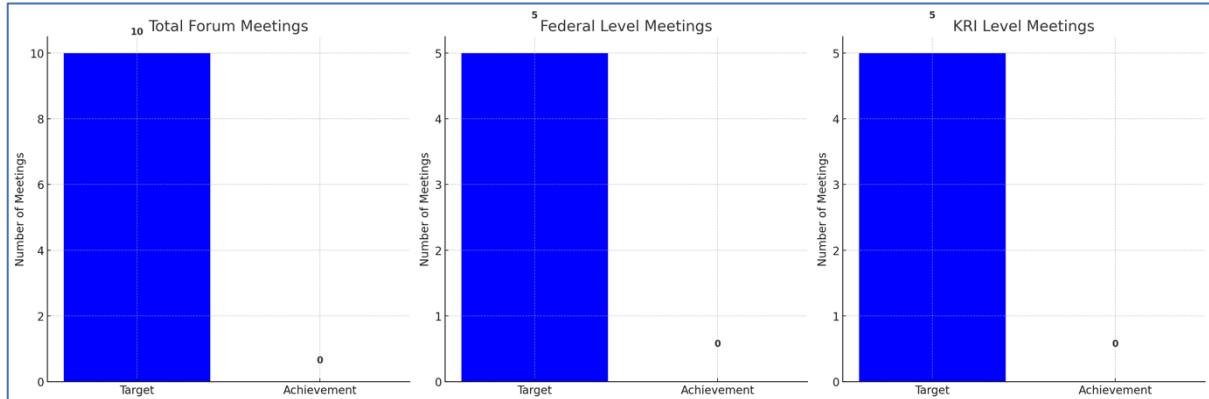
Progress by reporting period:

Based on the reports, no quarterly forum meetings have been held so far at either the federal or KRI level against the total target of 12 such meetings (5 each at federal and KRI level). The Year 1 report mentions that the structure of the Anti-Corruption Forum has been conceptualized but not established yet. The upcoming reports do not provide any update on the forum, indicating that the forum remained unestablished, and no meetings were conducted through the project duration up until the latest reporting period.

With the project nearing completion and no meetings held in the first three years and final quarter, it seems highly unlikely that the target of 12 forum meetings will be met. Establishing the forum and organizing the targeted number of meetings appears to be an area where the project has faced significant challenges and made no progress. The project may need to reflect on the reasons behind this and document the learnings, even if the forum meetings do not materialize by project end.

Output 5: Increased transparency and public accountability

Output 5 shows mixed progress. The training of civil society and media organizations on responsible reporting of corruption cases has exceeded the target by a significant margin, indicating strong performance in this area. However, the enhancement of strategic outreach capacity of public institutions is at 50% of the intended target, suggesting that further work is needed to fully achieve this objective. Initiatives to enhance citizen's access to information have also progressed slower than planned, with only one-third of the target initiatives implemented so far.

A) # of public institutions with enhanced strategic outreach capacity to communicate better about their anti-corruption efforts (Disaggregated by type)

- Total target: 4 public institutions with improved strategic outreach capacity
- Cumulative achievement: 1 (25% of total target achieved)
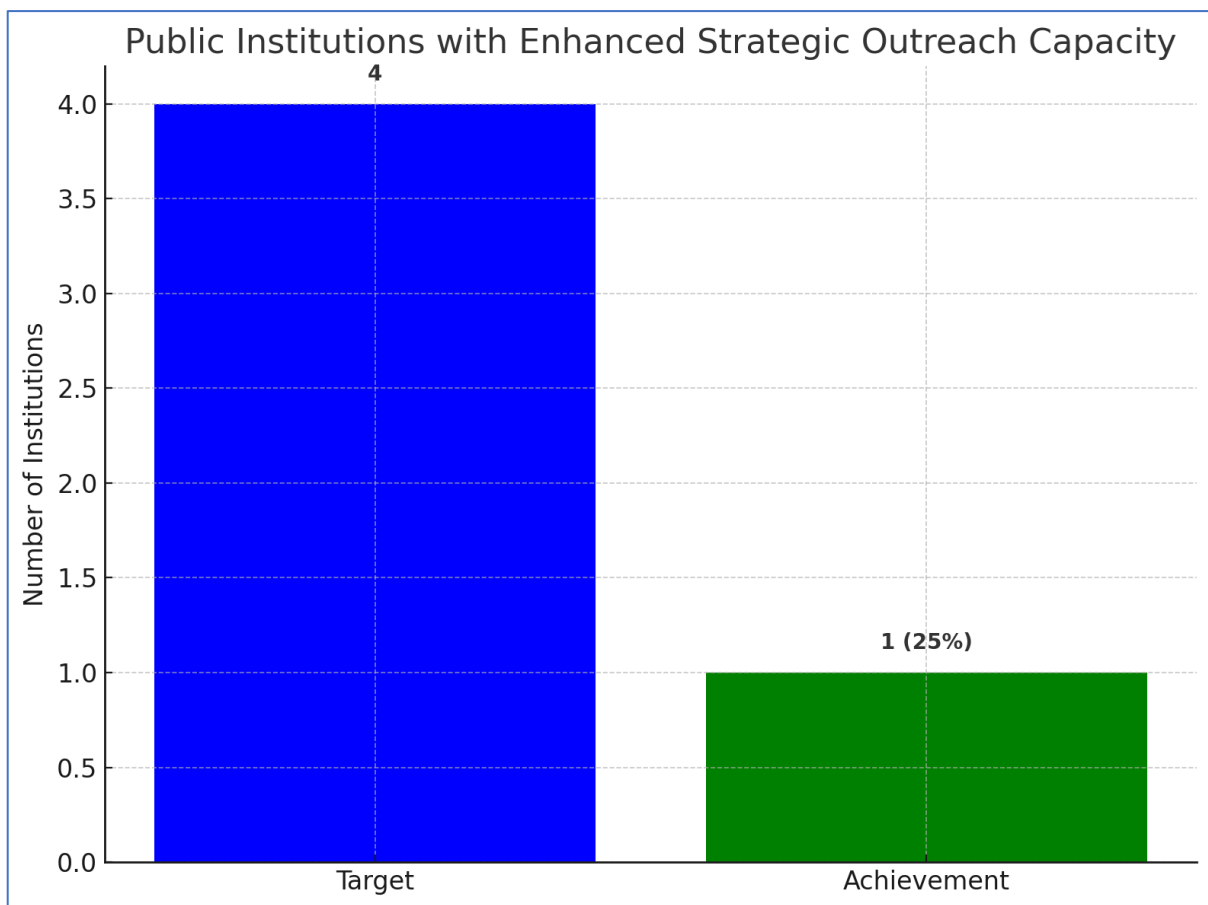
Progress by reporting period:

January 2023 - October 2023:1 public institution

January 2024 - March 2024: 0 public institutions (the report mentions ongoing support to FCoI and KRI CoI but no confirmed enhanced outreach capacities yet)

The cumulative progress shows that outreach capacity of 1 public institution has been enhanced so far against the total target of 4 institutions. The Year 1 and 2 reports do not mention any concrete achievements on this indicator. The Year 3 report states that 1 institution's outreach capacity was enhanced. However, the Year 4 report suggests ongoing

efforts to boost FCoI and KRI CoI's strategic communications but does not confirm enhanced capacities yet.

With only 1 institution's outreach capacity strengthened until the latest reporting period, the project seems behind track in achieving the target of enhancing capacities of 4 institutions. As the project is in its final stage, expedited efforts would be required to provide the envisaged support to more institutions, assess improvements in their outreach, and report concrete results in order to come closer to the intended target.

- Total target: 30 (18 civil society and 12 media organizations)
- Cumulative achievement: 46 (153.33% of total target achieved)

Civil Society and Media Organizations Trained on Responsible Reporting
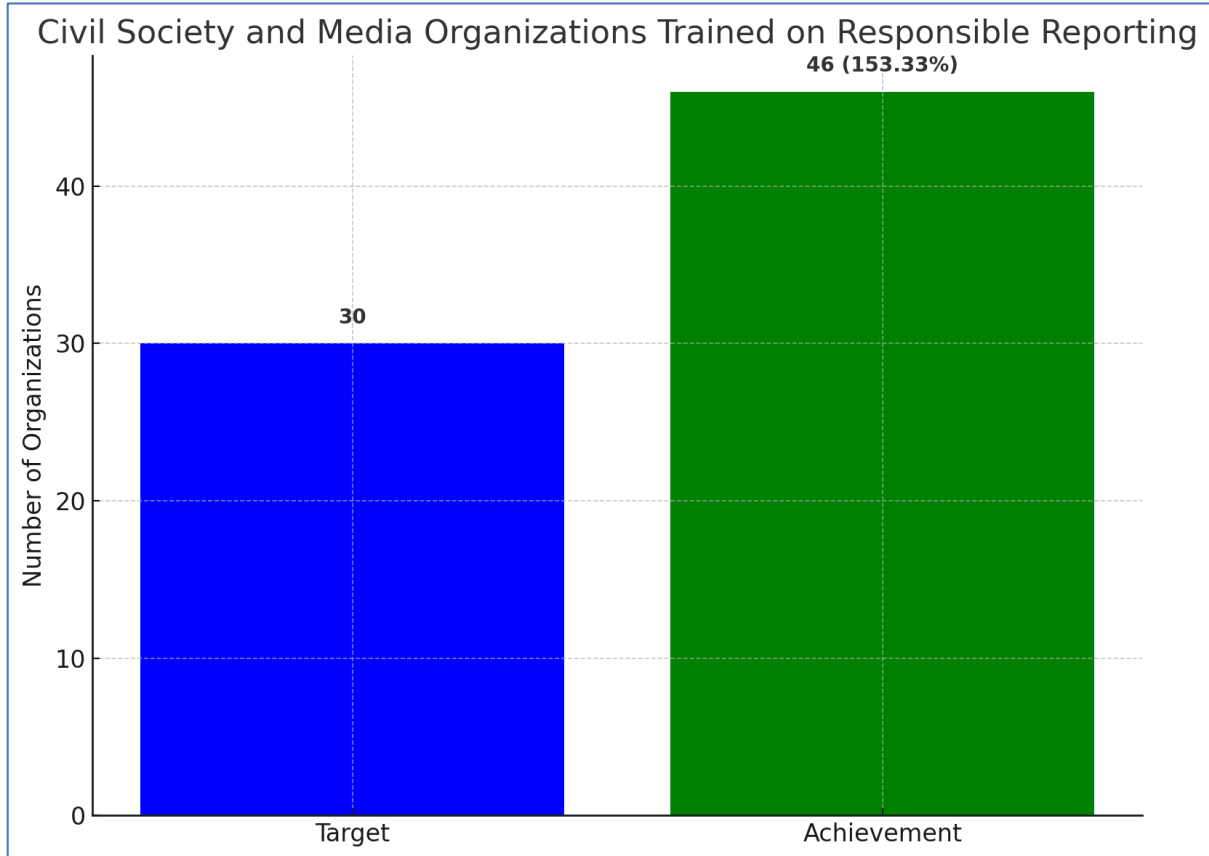
Progress by reporting period:

April 2021 - April 2022: 16 organizations

April 2022 - December 2022: 16 organizations

January 2023 – October 2023: 16 civil society activists and journalists trained (breakdown by organization type not provided)

January 2024 - March 2024: Around 30 civil society and journalists trained (exact number and breakdown by organization type not provided)

The project has exceeded the total target of training 30 organizations, having cumulatively trained around 46 civil society organizations and media on responsible reporting of corruption cases. However, while the Year 1 report provided a breakdown of the types of organizations trained, the subsequent reports did not give this disaggregation. Respectively, it is unclear from the available information what is the final breakdown between civil society organizations and media outlets out of the 46 total trained. Nevertheless, the project has performed well on this indicator, surpassing the overall training target. Providing the disaggregated data in the future reports would help track the progress against the specific targets for each type of organization.

C) # of initiatives supported to enhance citizen's access to information with CoI, HJC, Parliament and the upcoming Access to Information Commission or its alternative

- Total target: 6 initiatives
- Cumulative achievement: 2 (33.33% of total target achieved)
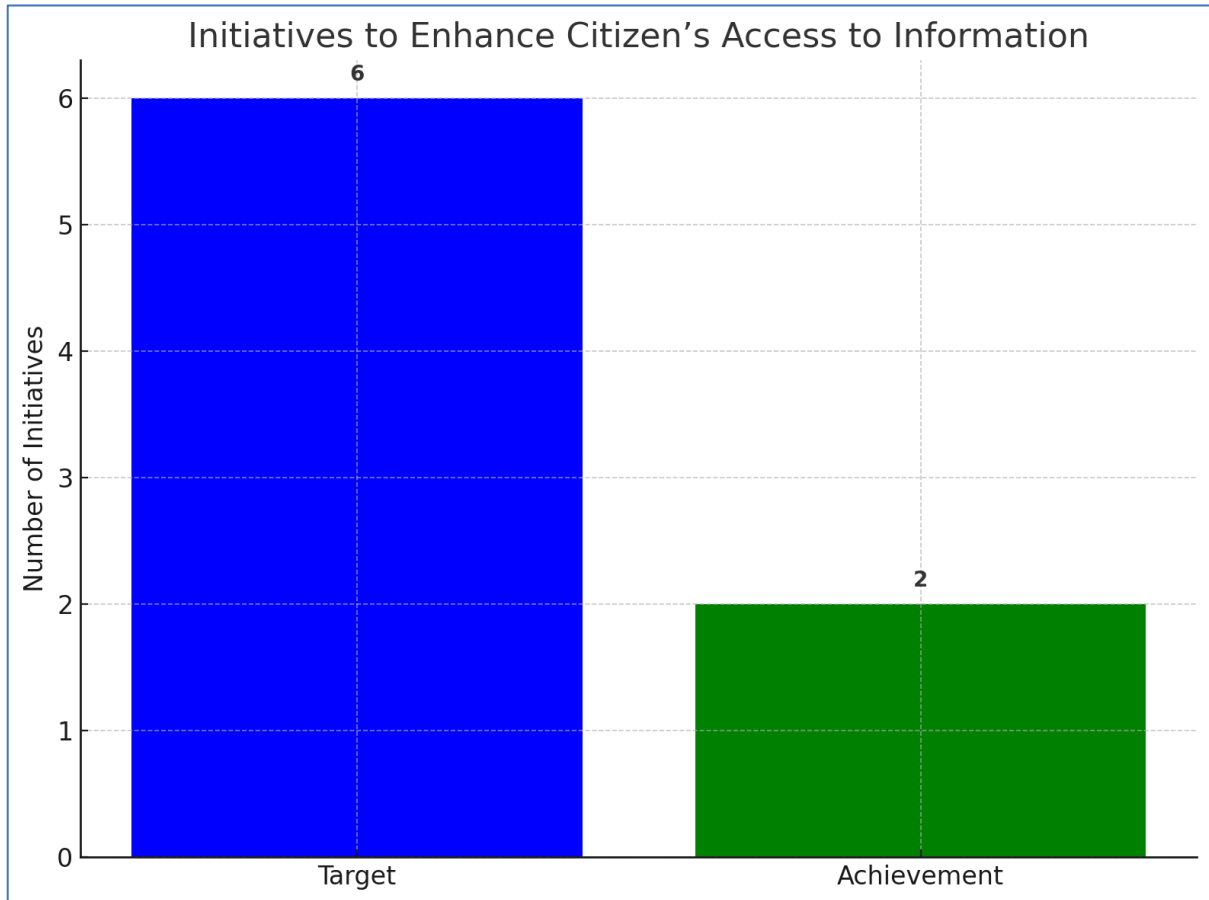
Progress by reporting period:

Year 1 report (Apr 2021 - Apr 2022): 1 initiative (supported the Kurdistan Regional Government in launching a special hotline to receive complaints related to corruption and irregularities)

Year 2 report (Apr 2022 - Dec 2022): 1 initiative (hotline launched in Year 1 continued to operate)

Year 3 report (Jan 2023 - Oct 2023): 1 initiative (support in the adoption of the Access to Information Law draft by the Council of Ministers in October 2023)

Year 4 report (Jan 2024 - Mar 2024): 0 initiatives (the report mentions this activity will be implemented following the enaction of the Access to Information law)

Against the total target of supporting 6 initiatives to enhance citizen's access to information, the project has so far supported 2 initiatives based on the progress captured in the reports - launching of a corruption complaints hotline in Kurdistan Region and supporting the adoption of the draft Access to Information Law. With the Access to Information Law

pending enaction, the project has not been able to implement related initiatives planned under this indicator.

Given that only 2 out of the targeted 6 initiatives have been completed so far, and the project is nearing its end, it seems challenging for the project to meet its target unless the pending Access to Information law is enacted soon and the planned initiatives are rapidly implemented in the remaining project duration. The progress on this indicator appears to be highly dependent on the enaction of the law which is beyond the project's direct control.

Annex 11. Pledge of ethical conduct in evaluation

ETHICAL GUIDELINES FOR EVALUATION
PLEDGE OF ETHICAL CONDUCT IN EVALUATION

UNEG — United Nations Evaluation Group

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

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.**

ACCOUNTABILITY

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.

RESPECT

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.).

BENEFICENCE

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 when 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 that is not possible, I will report the situation to my supervisor, designated focal points or channels and will actively seek an appropriate response.

11th of February 2024, Andrei Iovu

_____ (Signature and Date)