

UNDP Accountability and Transparency (ACT) Project Multi-Donor Evaluation.

Kabul, Afghanistan

4th – 31st of May 2011

Project details:

The overall Goal of the UNDP ACT project is *‘The Government’s ability to extend representation, accountability and service delivery through national and provincial ministries, sub national government and other institutions is clearly improving’*. The Purpose is the *‘capacity of national and local Government institutions to tackle corruption is improved with civil society providing greater demand for reform’*.

The ACT project began in 2007. In April 2009 the project was substantially revised and extended by three years to March 2012. The revised Accountability and Transparency (ACT) project was signed between the Government of Afghanistan and UNDP in April 2009. The scope of the project was extended to include the Control and Audit Office (CAO), Ministry of Education (MOE), Ministry of Interior (MOI) and Ministry of Finance (MOF). The High Office of Oversight (HOO) is the lead partner on corruption.

Start date: January 2007; **End date:** March 2012

Donors since 2007: Canada, Denmark, Italy, Norway, United Kingdom

Budget (annual report 2010) USD: 22,310,625

Committed (as of annual report 2010) USD: 15,291,026

Implementing agency: UNDP Afghanistan

Principal counterpart: High Office of Oversight

Review details:

The objective of this review is to undertake a joint donor annual review of the UNDP ACT project, specifically to: 1) assess the likelihood of the project achieving its target outputs, purpose and goal in remaining 10 months; 2) suggest measures to improve delivery over remainder of project; 3) recommend factors and issues to consider for future support on anticorruption.

The assignment was undertaken by Lorenzo Delesgues and Khwaga Kakar and was managed and funded by DFID on behalf of the donors currently funding the project.

The review team carried out a review of relevant strategic documents on anti-corruption. All documents to show ACT’s activities over the past three years were reviewed. Semi-structured interviews were conducted with a range of key national and international actors involved in the anti-corruption efforts, and field visits were organised in order to observe the contribution of the ACT for promoting capacity building for the Afghan institutions. Offices established with the support from ACT were visited and interviews were carried for staff from different levels of responsibility. Results were triangulated to determine results.

Acronyms

Accountability and Transparency	ACT
Afghan National Development Strategy	ANDS
Annual Workplan	AWP
Control and Audit Office	CAO
Civil Society Organisation	CSO
Department for International Development	DFID
Government of Islamic Republic of Afghanistan	GIRoA
High Office of Oversight	HOO
Integrity Promotion Office	IPO
Letter of Agreement	LOA
Ministry of Education	MoE
Ministry of Finance	MoF
Ministry of Interior	MoI
National Anti-Corruption Strategy	NACS
United Nations Convention Against Corruption	UNCAC
UNDP Country Office	UNDP CO
Vulnerability to Corruption Assessment	VCA

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Executive Summary

The objective of this assignment is to undertake a joint donor annual review of the UNDP ACT project, specifically to:

- assess the likelihood of the project achieving its target outputs, purpose and goal in remaining 10 months;
- suggest measures to improve delivery over remainder of project;
- recommend factors and issues to consider for future support on anticorruption.

The overall Goal of the UNDP ACT project is *‘The Government’s ability to extend representation, accountability and service delivery through national and provincial ministries, sub national government and other institutions is clearly improving’*. The Purpose is the *‘capacity of national and local Government institutions to tackle corruption is improved with civil society providing greater demand for reform’*.

The review aims to provide detailed assessment and constructive comments to assist the project. The review recognises that the UNDP ACT project takes place in one of the most complex and challenging environments in which to tackle corruption. Afghanistan is ranked by the latest Transparency International index as the equal second most corrupt country in the world (with Myanmar and just above Somalia). The relationship with counterparts has at times been difficult and the security environment has worsened over the course of the project.

The review found that the project’s outputs and purpose are only likely to be achieved to a very limited extent. The purpose is unlikely to be achieved but some outputs show delivery.¹

Whilst the review found that the design was theoretically sound in terms of its interdependent components and coherent approach in implementation, it has suffered from the realities of an extremely complex and unstable political and management environment. This is due to a number of factors, including the political environment, UNDP management issues and staffing difficulties suffered by the project. Most of the activities planned in the ACT project have not been delivered. Given this, the value of funds spent in comparison to the output delivered by the project is difficult to justify. The project did not respond and adapt to the important changes in the Afghan anti-corruption environment.

Key findings:

- The ACT project’s recent rebalancing of focus amongst the components has strengthened the structure of the project.
- 2011 has shown significant improvement in the project’s communication and relationship with donors and government counterparts.
- UNDP has been flexible to changing priorities and requests in providing support to the Monitoring and Evaluation Committee secretariat.

¹ The project is scored 4 on the DFID scale. (The DFID scoring system is 1-5 where 1 is the purpose and outputs are likely to be completely achieved and 5 is the purpose and outputs are unlikely to be achieved)

- The project contributed to the physical establishment of HOO and the recruitment of new staff but there is no evidence of capacity building or establishment of a “comprehensive” monitoring system in HOO.
- Line ministries – the MoF, MoE and MoI - suffered from a lack of attention. Difficulties with the HOO displaced the energy and attention of the small number of project staff. Despite expansion of work in this area since October 2010, the review assesses the project still provides insufficient staffing and technical support to the MoF and to the CAO.
- The major activities under the civil society component of the project (component 3) were put on hold for most of the year in 2010 meaning that NGOs were not mobilised to play their complementary role in complaint monitoring at the line ministries.
- The project did not manage to achieve the interaction amongst different institutions as set out in the project document. Without this, including the bottom-up pressure from civil society the theoretically mutually reinforcing interventions were unable to support and reinforce reforms.
- Increasing insecurity has adversely impacted the delivery of ACT by delaying and reducing the recruitment of key staff. It also limited the opportunities for direct on-the-job training as the presence of UNDP staff at the HOO office was significantly reduced for security reasons.
- The changes in project manager and the gaps between project managers damaged relationships with government counterparts and the affected the coherence and continuity of the project.
- The LOA hiring process was often not properly monitored, as UNDP staff were not directly involved in the recruitment of new staff. The LOA staff received only limited training. There was no systematic twinning between the staff hired under the LOA and regular civil servants.
- Indicators and baselines problematic or missing and milestones over-ambitious. Monitoring and oversight of the project is extremely weak with the quarterly reporting process not being sufficiently prioritised.
- There has been insufficient identification and monitoring of the risks to the project. The project was often insufficiently flexible in undertaking corrective actions to overcome risks and challenges.

Headline recommendations are as follows. These recommendations focus on the key targets for the project over the remaining months. Note that some of these (especially 1, 2 and 3) endorse the ACT project’s recent direction and approach. Others (4, 8 and 9) are partially underway.

HIGH PRIORITY

1. Strengthen the support of ACT in areas where activities have been initiated and the political buy-in and support from Government strong (CAO, MoE and MoF).
2. Prioritise rapid processing of the second round of civil society grants.
3. Concentrate the project’s support to the High Office of Oversight on specific areas: transparency of the complaints process, inter-institutional agreements and asset declaration.
4. Increase the speed and transparency of recruitment for key ACT project positions. Accelerate and improve the quality of recruitment of remaining staff under LoA. Renew

focus of LoA on real capacity building of civil servants by LoA staff as this is key to the project's exit strategy.

5. Make better use of coordination meetings to improve implementation and risk management (project board meetings, the newly established monthly donor fora, UN fora and technical expert meetings in HOO).

6. Take steps to improve ability to respond flexibly to difficult environment and a more intensive approach to risk management.

7. Conduct a light touch review of the results framework and logframe to improve indicators where possible. Ensure accurate project reporting based on outputs.

MEDIUM PRIORITY

8. Design and conduct baseline surveys on the awareness and the behaviour of civil servants in relation to corruption in collaboration with UNODC and civil society.

9. Ensure that the Monitoring and Evaluation Committee Secretariat is quickly staffed and structured for MEC independence.

10. Ensure that the ongoing budget is in line with the project's priorities.

LOW PRIORITY - MAY BE ADDRESSED ELSEWHERE OR IN LONGER TERM

11. Ensure greater focus on real capacity building of UNDP local staff by international staff to mitigate against disruption caused by high international staff turnover.

12. Establish a review committee to assess the progress made in UNCAC implementation.

This review is divided into several parts: the **background** summarises the context of anticorruption efforts in Afghanistan **ACT's approach** and the history of the project; the **findings section** analyses the impacts and results of each of the components during the life of the project; and there is a comprehensive section on **risks and challenges** including suggestions for measures to address these. The report concludes with specific **recommendations** including amendments to the logframe. Delivery against each activity is analysed in **Annex 1** and spend is analysed in **Annex 2**.

Full Review Report

Recommendations to UNDP and donors

Headline recommendations emerging from the findings of the report are summarised below. These recommendations focus on the key targets for the project over the remaining months. They suggest ways forward to try to achieve progress on the most important priorities and objectives in the time remaining, focusing on the feasible and the realistic and recognising the difficulties of project implementation. Note that some of these (especially 1, 2 and 3) endorse the ACT project's recent direction and approach. Others (4, 8 and 9) are partially underway.

HIGH PRIORITY

1. Strengthen the support of ACT in areas where activities have been initiated and the political buy-in and support from Government strong (CAO, MoE and MoF).

This can be achieved by:

- Completing VCAs and action plans first for Ministries where initial plans are in place (MoI, MoE, MoF and CAO) but do not move into new ministries until these are finalised and implemented.
- Focussing support for MoE and MoF complaints' departments in: staff recruitment, database development, specialized training for complaints.
- Ensuring MoE and MoF complaints' departments are formally linked to HOO, which has the overall coordinating role for complaint monitoring and processing.
- Associating HOO as far as possible with the extension of the project to line ministries (i.e: HOO staff could be seconded to Ministry complaint departments)
- Ensuring a greater inclusion (formal and informal) of line ministries (MoE, MoF and CAO) in coordination meetings such as the inter-institutional working group.
- Adjusting the structure of the project to ensure support to line ministries can continue regardless of progress with other components, reducing interdependence of components and 'firewalling' this work from the rest of the project (also relevant to recommendation 6).

Action: UNDP project management, Line ministries concerned, HOO

2. Ensure sustainable support to civil society organisations administered as a priority. This can be achieved by:

- Distributing grants to CSOs as a priority activity.
- Closely monitoring CSOs' performance following grant distribution.
- Supporting civil society to communicate and coordinate with government.
- Donors agreeing to a process to provide further financial support or grantees when ACT ends in March 2012.
- Donors conducting a study to identify the best ways to support Afghan civil society on anticorruption in the longer term, considering factors such as donors' and civil society's management requirements, flexibility, grant size and coordination.

Action: UNDP project management, CSO, Donors

3. Concentrate the project's support to the High Office of Oversight on specific areas: transparency of the complaints process, inter-institutional agreements and asset declaration. This can be achieved by:

- Improving technical dialogue with the HOO
- Ensuring LOA activities focus on project goals
- Limiting capital spend and not providing support to law enforcement activities
- Ensuring complaint registration is more transparent and accessible to a larger number of actors by using an online database.
- Focusing on line ministries VCAs and develop action plans
- Establishing the inter-institutional agreements
- Encouraging the HOO to publish asset declarations on a website.
- Donors should support coordinated messages to HOO on these issues.

ACTION: UNDP project management, HOO, donors.

4. Increase the speed and transparency of recruitment for key ACT project positions. Accelerate and improve the quality of recruitment of remaining staff under LoA. Renew focus of LoA on real capacity building of civil servants by LoA staff as this is key to the project's exit strategy. This can be achieved by:

- Prioritising the VCA consultant and complaint management staff positions
- Setting a 1 month deadline for the recruitment of key technical positions (applied by donors)
- Maintaining transparent merit based recruitment without exception (not compromised for speed.)
- Ensuring timely publication of all advertised positions. Close collaboration between the project and the country office to accelerate the recruitment of qualified candidates in a transparent manner.
- Continued recruitment for MoE and HOO through LOA – focusing on increasing existing areas of support rather than moving into new areas.
- Development of output-oriented TORs with specific success criteria on capacity development of civil servant counterparts – LOA staff should be twinned with line positions where possible.
- Monitoring LoA staff by UNDP and the government against agreed criteria.
- Ensuring UNDP staff are present on every interview panel
- Ensuring systematic capacity transfer to LOA staff by UNDP project team
- Capacity transfer between LOA staff and regular ministerial staff should be included in LOA's TOR.

Action: UNDP project management and Government (HOO and MoE)

5. Use coordination meetings to improve implementation and risk management. This can be achieved by:

- Using the Project Board Meetings to discuss progress in delivering outputs and any implementation problems, risks and lessons learned. Ensure there is space in the agenda to raise concerns. Invite civil society as observers. The Project Board Meetings are must be held regularly.

- Using the donor meetings to address political issues and constraints and ensure that all donors' programmes reinforce the bullets under 3.
- Using UN fora to ensure a coherent approach amongst UN institutions
- Developing improved coordination mechanisms for all institutions working with the HOO – technical level meetings essential. Greater emphasis by UNDP on coordination with GIZ and USAID in engagement with HOO, to ensure coherence and avoid manipulation and competition. Establishing a regular meeting among HOO's partners, ideally organised by HOO. Alternatively the UN and donors should ensure all partners meet on a regular basis (UNDP, UNODC, UNAMA, USAID, GIZ, civil society, Harakat, TAF)
- Using the inter-institutional working group to promote a coherent anti-corruption approach in government.

Action: UNDP project management, Country Office, Government counterparts, other Board members (incl donors) UNAMA, USAID and GIZ.

6. Take steps to improve ability to respond flexibly to difficult environment and a more intensive approach to risk management. This can be achieved by:

- Monitoring of a more comprehensive range of risks (see table)
- Using the donor group to monitor and manage risks
- Regularly reviewing ability to manage risks overall (e.g. current range and level of risks)
- Regularly reviewing ability to deliver ambitious project in a difficult context and prioritise accordingly
- Building in a systematic response to an altered security situation and associated restrictions, by reviewing impact on ability to deliver the project scale
- Carrying out activities first where greatest political willingness and capacity exist, recognising this is likely to be a changing picture (see recommendation on component 2)
- Adapting human resources and other procedures to the Afghan context.
- Ensuring that the project specifically looks to respond to priorities and benchmarks identified by the MEC.

Action: UNDP project management and Country Office

7. Conduct a rapid and light touch review of the results framework and logframe to improve indicators where possible. Ensure accurate project reporting based on outputs. This can be achieved by:

- Amending some of the indicators and targets to be more realistic and to capture existing progress (see logframe section)
- A full re-structure of results framework is not recommended at this stage in the project because only 10 months are left. Donors should plan for conducting a project closure review on the basis of limited information and data.
- More detailed reporting in quarterly reports on output delivery, what has progressed and what hasn't. Less reporting on delivery by budget execution (financial 'burn rate').
- Reporting to include problems related to political and implementation risks.
- Reporting to set out clearly the decisions needed and in advance of the quarterly board meeting.

- The word “delivery” should not be used to describe expenditure.

Action: UNDP project management and Country Office, DFID/Donors.

MEDIUM PRIORITY

8. Design and conduct baseline surveys on the awareness and the behaviour of civil servants in relation to corruption in collaboration with UNODC and civil society. This can be achieved by:

- Designing the baselines in a manner that is helpful to other anti-corruption initiatives or future work, especially for CSOs to monitor civil servants responses to corruption (also valid for component 3). These should be public, the questionnaire should be circulated and shared with civil society so that stakeholders are involved in its design.

ACTION: UNDP project management, HOO, UNODC

9. Ensure that the Monitoring and Evaluation Committee Secretariat is quickly staffed and structured for independence. This can be achieved by:

- Continuing the current approach being taken by UNDP to facilitate a small and flexible secretariat. Facilitating support to ensure that the MEC is a well-informed committee but not established as a rival institution to the HOO.
- Continuing the current approach to minimise interference between the HOO and the MEC by establishing clear independent funding channels and an independent staffing process.

Action: UNDP project management, MEC, HOO

10. Ensure that the ongoing budget is in line with the project’s priorities. This can be achieved by:

- Reviewing recurrent costs –UNDP overheads- ensuring these are reduced or linked to output delivery
- Ensuring costs are linked to outputs
- Reviewing budget needs and reducing these where possible, particularly capital expenditures
- UNDP and donors together negotiating an amended budget related to activities / output delivery, consideration of no cost extension.
- Reviewing whether there is a real need for large further capital and investment expenditure. Providing justification if there is.
- Donor checks that the equipment being purchased is being adequately inventoried
- Donor checks that appropriate procedures are in place for disposing of the capital equipment following the project end.

Action: UNDP Country Office and donors.

LOW PRIORITY – MAY BE ADDRESSED ELSEWHERE OR IN LONGER TERM

11. Ensure greater focus on real capacity building of UNDP local staff by international staff to mitigate against disruption caused by high international staff turnover. This can be achieved by:

- Ensuring time is systematically set-aside for capacity transfer to UNDP local staff by International staff
- Ensuring capacity development of UNDP local staff is part of performance assessment for UNDP international staff.

Action: UNDP project management

12. Establish a review committee to assess the progress made in UNCAC implementation.

- There has been very limited work by UNODC and the International community, on how to bridge the gaps between Afghan laws and institutions and full implementation of UNCAC. For the moment the focus is mostly on law reforms.

Action: UNODC, Donors and Embassies, Government of Afghanistan

Background

Corruption in Afghanistan

Transparency International classifies Afghanistan as the 2nd most corrupt country in the world in 2010 (tied with Burma and just ahead of Somalia). National surveys conducted by Integrity Watch Afghanistan, a local NGO, reported that the average value of bribes in Afghanistan have doubled since 2008. This level of corruption threatens the Afghan state building process. Corruption undermines the actions of the Afghan government and the international community by corroding legitimacy. However despite high levels of corruption in Afghanistan, the international community only started to seriously consider the issue following the Paris conference in 2009. The sudden increase in funding for UNDP's ACT project in 2009 exemplifies this attention. Initially many of the international community's anti-corruption measures focused on prosecutions. However, the lack of a strong judicial system combined with disagreement with Afghan authorities over corruption, has meant that the international community has begun reorienting its approach towards prevention, building institutional capacity and supporting civil society.

Support to build the capacity of anti-corruption agencies showed positive results in Hong Kong and Singapore in the late eighties. Members of the international community working on anti-corruption suspected that a similar approach might work in Afghanistan, and therefore greater effort was applied to building the institution of the High Office of Oversight (HOO), the Afghan government's leading anti-corruption agency. The HOO was created in 2008. The establishment of a coordinating body to organise the Afghan government's anti-corruption activities was useful, and initially the HOO represented a relatively different model focused on coordination rather than prosecution. As the role of the HOO changes, the political risks for misuse of that authority are important. The socio-political environment of Afghanistan and the nature of its corruption is very different to Hong Kong. After three years and despite significant financial and technical support we can see that the HOO has not delivered. The Monitoring and Evaluation Committee (MEC) was created in 2011 to monitor progress on anti-corruption and make recommendations for the way forward.

Combating corruption in Afghanistan can be achieved by increasing its cost – financial, judicial, social or political. In developed countries, the focus is on increasing the financial and judicial costs of corruption and there are institutional ways to conduct business that are effective and cheap and there is a strong judicial system to hold corrupt individuals accountable. In Afghanistan this environment does not yet exist. Focusing on increasing the financial and judicial costs will not yet be successful. Today, corruption in Afghanistan has become more complex. Fighting corruption may affect the stability of the Afghan political establishment, making it very sensitive for the Afghan political elite. Removing corrupt elites would certainly shake the apparatus of corruption and create debate about the reasons of prioritizing certain cases more than others².

² The case of Mr. Salehi in July 2010 was emblematic and important charges against him had to be dropped. Mr. Salehi was an important figure close to Karzai's interests and was arrested after a number of proves were gathered against him by an anti-corruption task force. The case was brought to media's attention and was dropped following accusation that a proper procedure was

However, it is also possible to fight corruption by increasing its social cost through a strong bottom-up approach. Civil servants must deliver services corresponding to the public demand. In parallel, civil society must be organised in such a way as to interact constructively with the state, helping to ensure that civil servants are accountable to the public.

For these reasons, it is important to focus on the corruption that affects Afghans' daily lives and limits business and prevents economic growth. When it comes to corruption, the international community is in a difficult position, with very little room to challenge high-level corruption in the government. The international community's initiatives to tackle high level corruption are increasingly presented as an attack on Afghan sovereignty. Organised individual citizens can be instrumental in generating the necessary pressure to address corruption and complement a top-down approach. Both top-down and bottom-up approaches are necessary; they are both part of ACT design.

ACT's Approach

The support to the government in its efforts to address corruption is primarily provided by two UN agencies: UNDP and UNODC. UNDP with the ACT project focuses on the prevention aspects of anti-corruption whereas UNODC focuses on the enforcement aspects.

The overall purpose of the ACT is to ensure "the capacity of national and local government institutions to tackle corruption is improved with civil society providing greater demand for reform". Hence there is a strong emphasis placed on capacity development and the transfer of skills. It is expected that through ACT, key government institutions reduce their vulnerabilities to corruption and will be able to address corruption complaints in collaboration with civil society. This at the central and sub-national level and that civil servant are more responsive in preventing and fighting corruption.

The project takes the Afghan National Development Strategy (ANDS), the National Anti-Corruption Strategy (NACS) and the United Nations Convention Against Corruption (UNCAC) as its starting point and ACT's components/outputs are developed in order to support the government in meeting the priorities and requirements set out in these documents. The focus as set out in the ACT project document is therefore both at central and sub-national through a sectoral approach.

The project's methodology is first to understand the extent and causes of corruption in sectors such as education, audit, and finance and to use this to inform the development anti-corruption action-plans, new procedures and new initiatives. The programme places a strong emphasis on developing national capacities through training of trainers and skills transfer. To this end the project planned to engage international experts/advisers on a long-term basis with an explicit mandate and responsibility to provide mentoring and on-the-job training to national staff.

The project document places distinct emphasis on supporting the involvement of anti-corruption civil society (CSO), media and the general public in preventing corruption.

not followed. Karzai nominated a commission to look into the case. The result was a major drawback for any strong attempts to touch high-level individuals close to the power.

The formation of partnerships to link CSO, media and the government is seen as the mechanism for this. One specific activity planned was the provision of small grants to CSOs and media.

The HOO is identified as key partner for ACT given its central role in overseeing the implementation of the NACS, preventing corruption, providing training and advocacy and raising awareness of these issues. Other partners of the ACT are the Ministry of Finance (MoF), Ministry of Education (MoE), Control and Audit (CAO), Ministry of Interior (MoI) and civil society.

ACT was revised in April 2009 with the following four components:

- Component 1: Improved institutional and policy environment created to support the implementation of the national anti-corruption strategy.
- Component 2: Enhanced accountability, transparency and integrity in key government institutions.
- Component 3: Enhanced capacity of civil society and media to effectively contribute to the fight against corruption.
- Component 4: Increased awareness and understanding amongst civil servants and the public in Afghanistan of their role in the fight against corruption.

A further amendment to the project was made in January 2011 whereby components 3 and 4 were merged into 3 and an additional area of support, the Monitoring and Evaluation Committee was created (MEC) became the 4th component.

The ACT project has a holistic approach to anti-corruption making it very ambitious. The different components of the project are designed to support and reinforce one another.

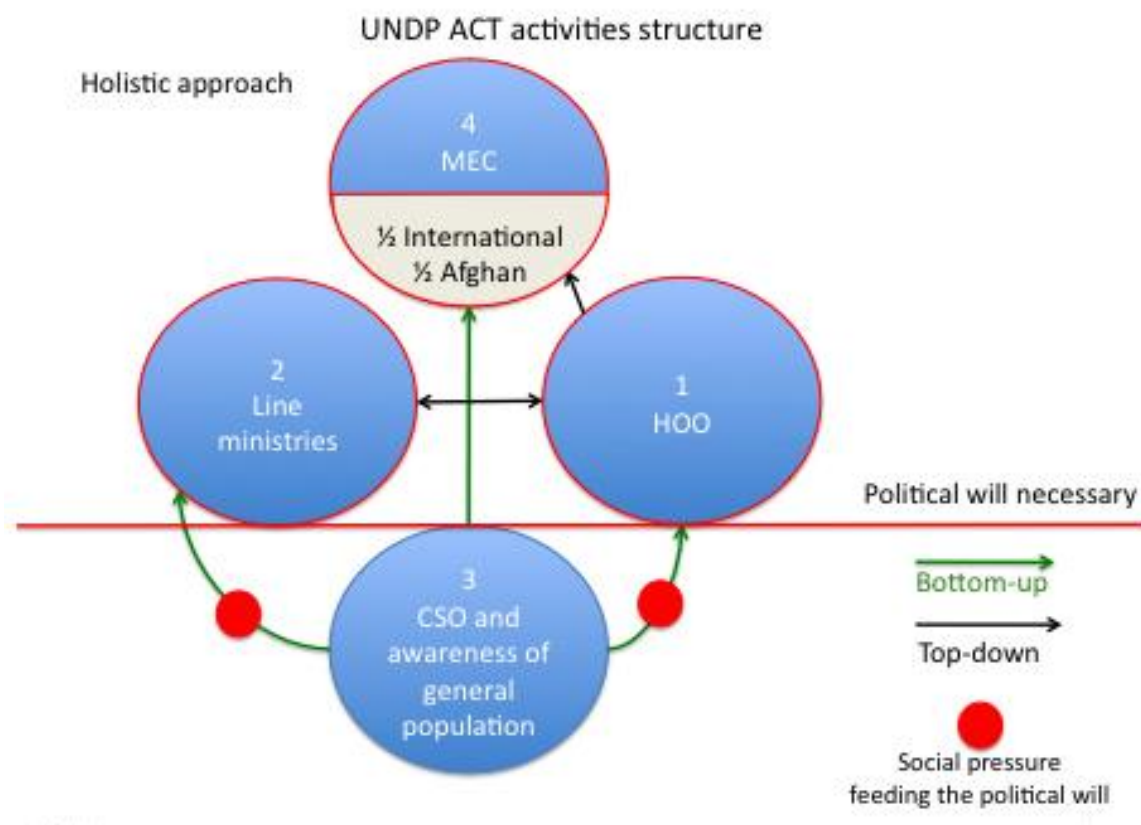


Figure 1: The Structure of ACT Project Components

ACT History

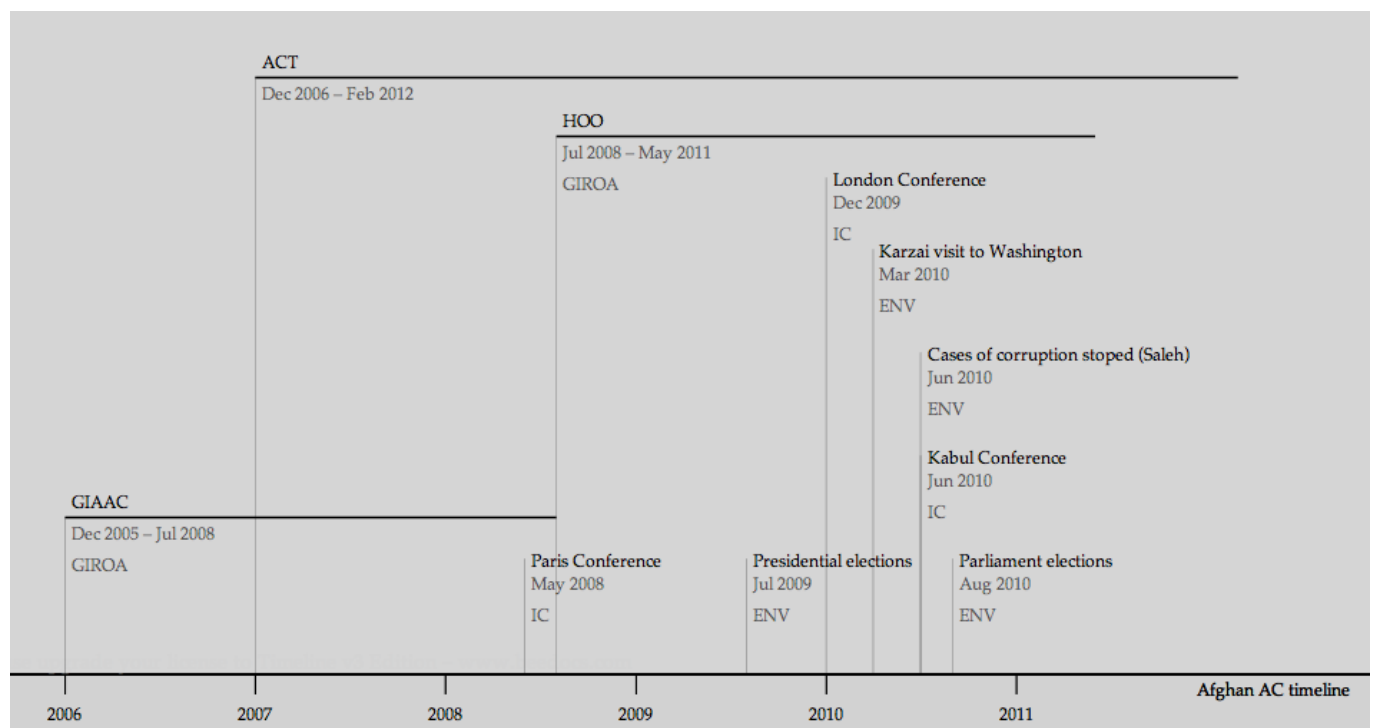
The UNDP ACT project was initially developed to support the implementation of the NACS and to provide support to civil society to be engaged on anti-corruption issues. Karen Hussmann and then Darko Pavlovic initially managed the project. In 2008 donors increased their emphasis on anti-corruption, and increasing pressure was brought to bear on the Afghan government to address the issue. In 2008, the government of Afghanistan took several key steps in the fight against corruption, including the ratification of the UNCAC, the finalization of NACS, and the establishment of a new institution responsible for coordinating anti-corruption activities of the government, the High Office of Oversight (HOO). The international community welcomed these efforts and increased its anti-corruption support. The ACT project was redesigned with a significantly larger budget and scope.³

Nils Taxell took on the role of project manager after the project's expansion. In October 2009, the Taliban attacked a UN guesthouse and the UNDP Country Office was unable to recruit a project manager until June 2010. During this initial period of the project, four different managers managed the project (none of them had been recruited for the position of project manager). The frequent shift in project managers handicapped the project greatly and set the stage for difficult working relations with the Afghan

³ ACT programme was initially launched in January 2006 and has been providing support to the GfRoa and Afghan civil society in the fight against corruption. The initial ACT programme has a much smaller budget of USD 2,3 millions.

counterparts once the new project manager, Edgardo Buscaglia, arrived in June 2010. It seems that for almost 8 months Afghan counterparts received little support and no strategic decisions were taken on how to reorient ACT according to the change in context that had taken place once the new project manager was on board.

In June 2010, a new project manager joined ACT but he faced the challenge of a tense relationship between the project and its main counterpart, the HOO. The focus of ACT was primarily on support to HOO and substantial attention was not paid to the three other outputs of the project: support to the line ministries, Control and Audit Office, civil society, and public awareness activities. The ACT is again facing further management challenges. Edgardo Buscaglia left in February 2011 although the review team understands that the project provided funding for him beyond this. Shervin Majlessi, who seems to have the right skills to deal with the political tensions, replaced him as acting project manager. Shervin Majlessi is due to leave the project in August.



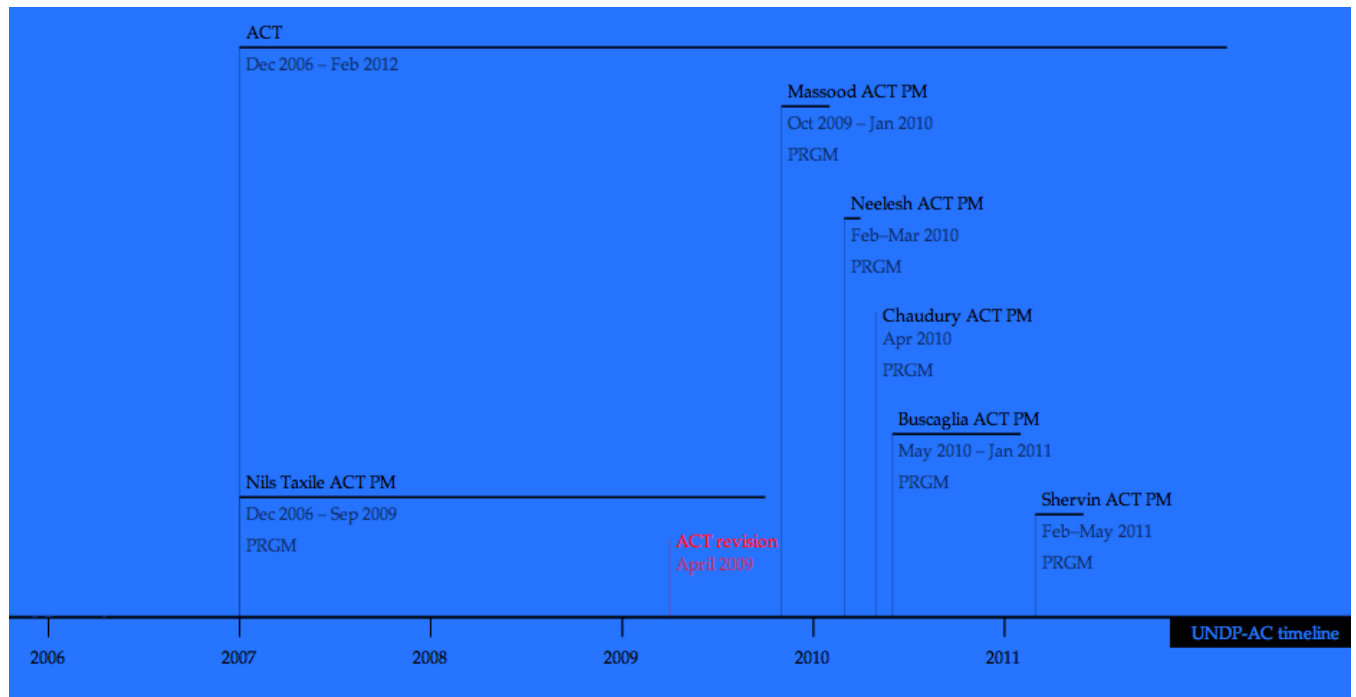


Figure 2: Major Anti-Corruption Events and ACT's Management Changes

ACTs' Management Structure

The management structure of ACT is composed of the following components: (1) Project Board, (2) Project Assurance, (3) Project Support, (4) Project Manager and (5) Project Team.

The Project Board includes UNDP Country Office- Executive and Senior Supplier; HOO- as the main Beneficiary; CAO; MOE; MOF and MOI; together with donors of ACT.

Recruitment, procurement, management and utilisation of financial resources should be conducted based on UNDP rules and regulations. Project assurance is to be provided by the UNDP Country Office. Project support such as recruitment of staff, procuring goods or services is to be provided by the UNDP Country Office Operations Section.

The project staff emphasise the need "to engage international experts/advisors on a long-term basis rather than relying on consultants. This will ensure capacity development, skills transfer, follow-up and sustainability of project activities". Additionally, it was made clear in the project document that there is a need for involving sufficient human resources in the project to ensure timely delivery.

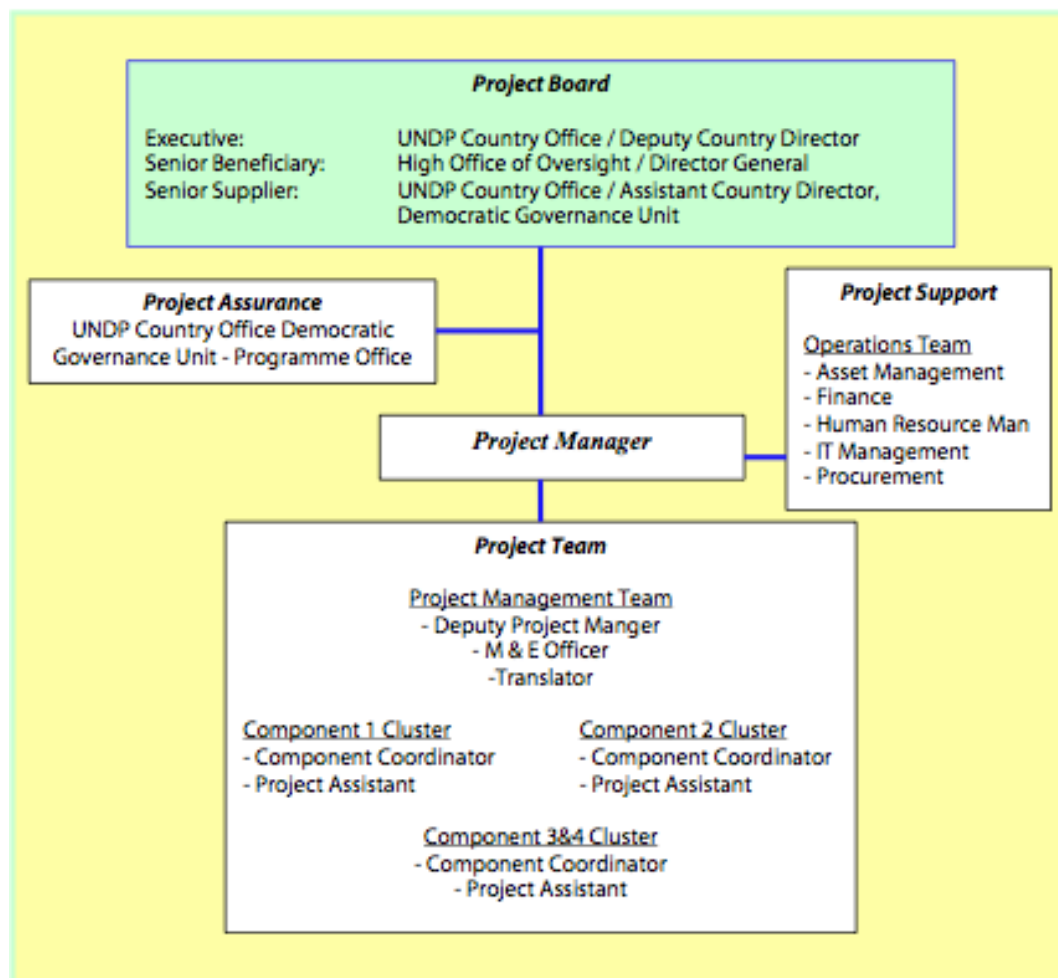


Figure 3: Management Structure of ACT

Findings

General assessment

The review found that the project's outputs and purpose are only likely to be achieved to a very limited extent. The purpose is unlikely to be achieved but some outputs show delivery.⁴

The ACT project's recent rebalancing of focus amongst the components has strengthened the structure of the project. Increasing focus on the line ministries such as MoF, CAO and the MoE should begin to make an impact. 2011 has shown significant improvement in the project's communication and relationship with donors and government counterparts. More regular meetings have been established with donors the project is making efforts – in difficult circumstances – to encourage greater government coordination also. UNDP has been flexible to changing priorities and requests in providing support to the Monitoring and Evaluation Committee secretariat. The review team found that donors were appreciative of this. It is too early yet to make an assessment of the work of the MEC.

However whilst the review found that the design was theoretically sound in terms of its interdependent components and coherent approach in implementation it has suffered from the realities of an extremely complex and unstable political and management environment. Further, the project was unable to respond and adapt to the important changes in the Afghan anti-corruption environment. Most of the activities planned in the ACT project have not yet been delivered. The review did not find activities where outputs had been fully completed, and the team assesses that these are unlikely to be complete by the end of the project. (In fact many of the activities are still in the process of being established, which is worrying for a project that is due to end in ten months.) The value of funds spent in comparison to the output delivered by the project is difficult to justify.

Project design versus project implementation

The lack of political incentives for reform represents a significant risk within the project. Judicial, financial and social pressures on political decision-makers are needed to trigger change. However in practice the project did not manage to achieve the interaction amongst different institutions as set out in the project document. Without this, including the bottom-up pressure from civil society, it has been extremely difficult to reinforce reforms.

Indicators and baselines problematic or missing

The indicators used to measure the successful implementation of the UNDP ACT project are in many cases problematic. The baselines which should have been used to measure progress against specific outputs were not established at the project's inception. The indicators in many places are not able to measure activities specific to ACT and therefore progress is not directly attributable to the project. For example, other anti-

⁴ The project is scored 4 on the DFID scale. (The DFID scoring system is 1-5 where 1 is the purpose and outputs are likely to be completely achieved and 5 is the purpose and outputs are unlikely to be achieved)

corruption programmes work in the same areas as the ACT project and also contribute to the achievement of the indicators.⁵

The lack of baselines for the activities related to awareness raising and capacity building is particularly challenging and we cannot objectively calculate activities' achievements. No baselines were established to assess the level of capacity of the HOO staff when the ACT initiated its work with them; similarly, no baseline was conducted in the other ministries when ACT initiated its work there. It is impossible now to assess the project's effect on the capacity of the HOO or other ministries without these baselines. In place of baselines, progress in the project has been assessed through processes such as holding workshops or hiring qualified staff, but this stops short of measuring a transfer of capacity to the regular civil servants working in the ministry.

Without more concrete baselines and indicators, UNDP uses the word "delivery" but this indicates only the balance between what was the budget supposed to be spent and the actual expenditures of the project. This is unrelated to the output delivery of the project during that period.

Milestones over-ambitious

In many places the milestones for the project are over-ambitious. Reforming 15 procedures a year is very ambitious, bearing in mind the complexity of such reforms and the number of variables involved in making the reforms successful. A more reasonable milestone might be 5 procedures per year and then once the simplification process is better understood, increasing this to 8 or 10. It is important to start the simplification process with institutions that have a strong political will for reform (for example the MoE and MoF).

In light of these problems with measurement, the assessment team focused on whether or not an activity had been carried out. Delivery assessments are based on information provided by UNDP, interviews and field visits. The assessment team also tried to understand the context and challenges within which project implementation took place.

Component 1: Improved institutional and policy environment created to support the implementation of NACS.

The ACT project contributed to the physical establishment of HOO and the recruitment of new staff. Office supply and cars were purchased and 29 staff were hired to support the HOO to carry out its functions. While these achievements should be acknowledged, there is no evidence of capacity building or establishment of a "comprehensive" monitoring system in HOO (see table 1).

The followings factors contributed to weak delivery in this component:

- The difficult political relationships between ACT and the director of HOO.
- The HOO's reluctance to engage with UNDP on policy or planning, and difficulty in agreeing priorities and practical workplan.

⁵ i.e: "Percentage of population aware of mechanisms available for reporting cases of corruption"

- Lack of recruitment of key posts to support HOO with its capacity building and on-the-job training. For example, a curriculum expert was supposed to develop training materials and a strategic organisation expert was to help in restructuring of HOO. These positions are still vacant.
- UNDP did not begin work on those activities that were not blocked and did not require political will where the project could have made progress (for example capacity building, in-country training events, Vulnerability to Corruption Assessments (VCAs), needs assessments).

However UNDP did show flexibility in responding to the strategic plan developed by MSI (the US contactor supporting the HOO).

The capacity development provided by UNDP to the HOO staff was conducted primarily through organising three workshops and several on-the-job trainings on procedure simplification. In interviews with the assessment team, the HOO staff complained that capacity building support had not been provided and that exchange opportunities were not facilitated. UNDP's security restrictions prevented UNDP-ACT staff from being based at the HOO to provide on-the-job training and mentoring. In addition a capacity needs assessment - coordinated with the strategic plan- was not conducted at the HOO by UNDP.

The staff hired under the LOA do not seem to have contributed to effectively capacity building of HOO staff due to the following reasons:

- The review team found that it was not possible to evaluate the capacity of staff newly recruited through the LOA. This is mainly because a transparent and merit based mechanism was not systematically followed. There have been some accusations of nepotism from different sides (HOO and UNDP).
- UNDP ACT staff played a limited role in HOO staff recruitment under the LOA and monitoring of the work.
- No clear TOR for staff existed.
- The LOA staff didn't work directly with HOO staff. There is tension between LOA staff and regular HOO staff due to salary differentials. This adversely affected collaboration between HOO staff and LOA staff.

Table 1: Summary of component 1 Key activity results

Outputs	Indicative Activates	Progress
1.1 High Office of Oversight enabled to fulfil its mandate.	Enhance the capacity of HOO Secretariat/Chief of Staff's Office	Not done as the capacity for many functions of HOO are still weak.
1.1.1. Management and administrative capacity of the High Office of Oversight enhanced.	Carry out needs assessment of Administration and Human Resource Departments	A needs assessment of HOO was completed by USAID.
	Provide capacity development support and on-the-job mentoring support to the Administration and Human Resource Departments	Not provided. Staff were hired under the LOA structure to support HOO but they did not receive training and their work was not monitored. The HOO is still in need of major capacity development

		support, but the political will for reform is limited.
1.1.2. Capacity of key departments in the High Office of Oversight enhanced through the issuing of Protocols of inter-institutional coordination for addressing the combat and prevention of corruption	Carry out needs assessment for the Strategy, Planning and Oversight Departments	Not done.
1.2. Comprehensive corruption monitoring system established	Establish a survey Unit in the HOO	A unit has now been established, but it is not fully functional and the capacity is weak.
	Develop monitoring system for the implementation of NACS	Not done.

Component 2: Enhance Accountability, transparency and integrity in key government institutions.

The project's support to the line ministries – the MoF, MoE and MoI - suffered from a lack of attention from UNDP country office. HOO difficulties displaced the energy and attention of the small number of project staff. With stronger and more consistent project management, the period October 2009-June 2010 could have been used to develop in-depth training materials and to conduct VCAs and other activities that did not require the political support of HOO. However without these technical inputs and human support, the project proved insufficiently flexible to deliver in these areas. It delivered poorly until further attention was given to the Ministry of Education starting in October 2010. On the HOO front, the *laissez-faire* approach observed between October 2009 and June 2010 due to a lack of consistent project management was exacerbated by tensions between the HOO leadership and the UNDP ACT project manager after July 2010.

Since October 2010, the ACT project has expanded its emphasis beyond the HOO and intends to work more with the MoE, MoF and CAO. This review assesses that there is still insufficient staffing and technical support given to the MoF and to the CAO. Some support is provided to the MoE through LOA staff and minimal support is provided to the MoF and CAO. One advisor works in CAO and many activities are pending due to the approval of the new audit law. The work at the MoI has not started; only initial discussions regarding conducting VCA have taken place. More capacity building and interactions with the ministry would have been possible during the last 18 months. We observed a strong political willingness to carry out activities of ACT in the CAO, MoF and MoE. These opportunities should not be lost.

Consistent work on the component 2 began only after October 2010 and was concentrated in the MoE and to a lesser degree in the CAO. The work at the MoE started in November 2010. The person in charge of the work at the CAO became the project manager for a few months in February 2010, diverting his support to the CAO. Another

factor causing delays in work with CAO is the new audit law's adoption delays. Its final content is not yet clear, delaying the development of training material for the CAO.

The strong political will that existed at the MoE, MoF and CAO could have been used more systematically. Important opportunities to increase the output delivery of the ACT were lost.

A systematic approach to the complaint mechanism is lacking, and no database of the complaints has been built. Such database could help with better circulation of information between the line ministries and HOO and could help UNDP project staff ensure follow-up is conducted consistently.

The VCA was only completed for the MoE. The VCA conducted for the MoF needs to be updated. The delay in conducting VCA has a direct impact on the development of line ministries' action plans, as action plans should be based on the findings of the VCAs.

Outputs	Indicative Activates	Progress
2.1: VCAs completed and recommendations integrated in on-going technical assistance in four government institutions.	Conduct VCA in Ministries of Education, Ministry of Interior, a municipality and CAO.	A VCA was completed for Ministry of Education. The process was participatory. However 3 other VCAs were not completed. VCA consultant recruitment has been initiated. The work on the Kabul municipality has not been initiated.
2.2: Complaints and investigation capacity established/developed in four government institutions	Carry out the review of complaints and investigation mechanisms at the central and sub-national level in Ministry of Education, MoF, MoI.	Review of complaints and investigation systems at MoE and MoF have been completed. Complaints departments have been established in two government institutions, the MoE and MoF. No database exists, no substantial training provided (central and sub-national level).
	Provide capacity development support and on-the-job mentoring to the staff in other complaints and investigation mechanisms in the ministries/offices at the central and sub-national level.	Not done however a few workshops were organised about AC in general.
	Develop complaints management software.	Not done. A plan for the software was developed. A procurement process for developing the software for the MoF has begun.
	Establish linkages with the network of civil society actors to serve as complaints recipients and forwarding channel.	Not done. A few CSO networks were established but no complaints have been sent to those networks.
	Train the civil society network and Integrity Promotion Officers on handling of the complaints	Not done. A one-day preliminary workshop was conducted for 6 CSOs in this regard.

2.3 Integrity Promotion Offices established in four government institutions.	Establish IPOs in MoE, MoF, and MoI.	IPOs have not been established. Agreements were signed between ACT and MoE and MoF for establishing IPOs. Discussions are on-going for an agreement to establish an IPO in the MoI.
	Carry out information campaign at the central and sub-national level for general population and civil servants in the ministries/offices on the on-going efforts to prevent corruption.	Not done. Anti-corruption posters were developed but not disseminated as per instructions from UNAMA due to the political risks.
2.4. Capacity of the Control Audit Office to detect corruption and fraud strengthened.	Carry out review of existing financial and auditing procedures to assess effectiveness in deterring and detecting fraud and corruption.	Some work has been completed.
	Carry out needs assessment of relevant CAO staff.	Not conducted completely but workshops were organised to measure the needs of CAO staff.
	Develop capacity development plan and training materials based on needs assessment.	Some training was offered but it was not based on the needs of CAO. The CAO requires much further specialised training.
	Provide capacity development support and on-the-job mentoring to relevant CAO staff to implement relevant financial audit and performance audit procedures	Different workshops were organised but on-the-job mentoring for audit procedures is pending the passage of the new audit law.
	Facilitate participation in relevant trainings and exchange visits to develop the capacity of relevant CAO staff	Not done. Only two CAO staff travelled to Singapore for a short training.
	Support training facilities with equipment and furniture	Done.

Component 3: Increased Awareness and Understanding amongst the public and enhanced capacity of civil society and media to effectively contribute to the fight against corruption.

In the summer of 2009 the second round of the grant facility was postponed. UNDP CO was concerned about risk of corruption in grant awarding process. A delay of more than 18 months followed before UNDP was able to re-announce the grant facility. The major activities under component 3 of the project were therefore on hold for most of 2010. The direct consequence on the ACT project was that NGOs were not mobilised to play their complementary role in complaint monitoring at the line ministries. ACT resumed the grant facility at the end of 2010 (after 18 months) and has now received 19 proposals. New grants will be awarded during the next two months.

The ACT team developed the awareness raising poster campaign, which explained that corruption could prevent access to education and to health facilities but this was blocked at the last minute because UNAMA found the messages of the posters politically controversial. The campaign was to be conducted at the end of 2010 in a sensitive post electoral environment where UNAMA was under important pressure from the Afghan government. Posters relating to electoral corruption were – rightly – not distributed. However after checking the content of the education and health messages, we think the campaign messages were not particularly controversial. This incident shows that a better coordination between UNDP and UNAMA should exist to avoid confusion and blockages.

Several workshops were organised with CSOs in 2010. However, the work of CSOs could not be linked with the work of line ministries in their efforts to prevent corruption. Most (2/3) of the CSOs who received a grant from UNDP in 2008 did not apply in the second round. Some failed due to a lack of continual support after the 2008 grant, others refused to participate because of UNDP's administrative complication and payment delays that puts the grant recipients at risk.

Outputs	Indicative Activates	Progress
3.1. Awareness raising campaign materials for the general public developed and distributed to raise understanding of general public about corruption and their role in the fight against corruption	Develop campaign plan in collaboration with HOO	Not done. A new consultant will work on the campaign plan.
	Develop awareness-raising campaign in collaboration with HOO and disseminate nationwide	Not done. AC posters were developed but not disseminated due to concern from UNAMA about their messages. Looking at the messages of the campaign, they did not appear controversial.
3.2. Training module on the role of public representatives in the fight against corruption developed and capacity building training delivered to members of parliament and provincial councils	Develop training module on anti-corruption for members of parliament and provincial councils.	Not done. Plan to hire an international consultant. The UNDP recruitment process took too long. The position was re-announced a couple of time.
	Conduct training of trainers workshops	Not done.
3.3. Training modules on the operational role of civil society in public complaints processing, monitoring public service delivery, research and advocacy, and access to information developed and trainings delivered(linked to output 2.2).	Conduct needs assessment for CSOs, youth and media organizations involved in getting involved in the fight against corruption	2 workshops in Herat, 2-3 in MoF, 2 in MoE workshops conducted with the members of CSOs regarding their needs and role in fight corruption.
	Develop capacity development plan for CSOs, youth and media organisations	Not done.

	Develop training materials aimed at increasing the capacity of selected organisations to increase their involvement in the fight against corruption.	ACT developed an integrity manual (2008-2009).
	Conduct training workshops at the central and sub-national level.	Not done. Training provided in Herat and Kabul.
3.4. Civil society and media networks established, guidelines for complaints processing by CSOs developed, and training manual on technical assessment of government institutions developed.	Hold consultations with CSOs, youth, media organisations and gov't	Done.
	Develop plan for engagement/collaboration between HOO/the government and CSOs, youth and media organisation to fight against corruption	Not done. HOO was not ready to engage with CSO. The process has now begun.
	Establish 4 AC networks one each working on complaints follow up and facilitations	Not done. 2 proposals have been received. In the selection process.
Output 3.5: Civil society networks receive grants through the accountability and Transparency Grant Facility in order to establish operational channels of engagement with the state.	Conduct awareness raising sessions on ACT-GF during capacity building workshops	Some information shared.
	Select 5-6 CSOs, youth and media organisations per year to receive grants through the ACT Grants Facility.	Not done. Proposals have been received. A technical assistance committee has been selected.
	Conduct annual evaluation lessons learned workshop to assess level of success and impact of activities carried out by grants recipients	Not done.
	Carryout assessment of the projects implemented by CSOs to determined the effectiveness of the project	Not done.

Component 4: Enhanced independent monitoring of anti-corruption efforts undertaken by government and civil society (MEC).

The MEC was inaugurated on 11 May 2011. The activities that UNDP will support have, for the most part, not yet had time to be completed. There are some risks of delays due to the institutional arrangements between the MEC and the HOO regarding staffing. HOO is supposed to agree the staffing of the MEC secretariat and there are currently some tensions between the two institutions.

Outputs	Indicative Activates	Progress

Output 4.1: An executive secretariat of the MEC established with institutional channels developed to link with independent technical sources of information from HOO, civil society and private sector networks	Conduct training needs assessment amongst the MEC technical staff; Develop training modules on AC practices	Not completed. The process that has started is ongoing.
Output 4.2: The capacity development of a civil society board achieved.	Conduct 6 trainings for civil associations and private sector networks	3 workshops for the Afghan Chamber of Commerce and Industries (ACCI)
Output 4.3: The formation, capacity development, and training of an operational private sector business board.	Conduct 6 trainings for civil associations and private sector.	Not done.
Output 4.4: Stakeholders group established	Organize frequent meeting forums and roundtables include key stakeholders	Not done

The review team understands that some outputs (4.2, 4.3 and 4.4) may be revised.

ACT's risks and challenges

As corruption climbed the international agenda following the Paris conference, important pressures were brought to bear on the UNDP ACT project. The budget grew from 2.3 million USD in 2008 to 15.2 million in 2009. There was a significant risk that this level of ambition was not realisable.

Before initiating or expanding projects, UNDP evaluates the relevance of the project with UNDP's mission and mandate, but does not evaluate the capacity of UNDP to effectively implement it. There is no evidence that the donors and UNDP conducted a feasibility study before increasing the project's funding in 2009.

There was insufficient identification and monitoring of the risks to the project. The ACT project documents identified only two risks, political will and the issue of differential salaries for HOO staff. The project documents undervalue a number of other risks. These risks are identified in the table below:

Risks	Importance
Lack of continuity in the management of the project	This impacted the relation with the HOO and the morale of the project staff. It also delayed the acknowledgment that the project needed to be reoriented.
Failure to gain government's commitment	The lack of leadership in the project made it difficult to get solid buy-in from the government. In addition, the political intricacies at government level were not well managed by UNDP. It has been extremely challenging for UNDP to get the government to be firm in its engagements regarding the project (strategy, project revisions).
Misunderstanding the requirements	It seems that the level of communication with the government was not equal across the different partners of UNDP (in particular with the MoF and HOO). Some of the high-level government staff we interviewed are still not clear about the project objectives and therefore are less supportive.
Lack of adequate involvement of the government	
Insufficient staffing and human resource planning /lack of staff capacity	This challenge was partially identified but UNDP did not respond to it. The review team did not find evidence of rigorous human resource planning for the ACT project. Due to the difficulties in recruiting competent staff in the Afghan environment, a comprehensive plan would have made the project less vulnerable.
Conflict between government about the design of the project	Certain aspects of the project are problematic to implement due to a lack of governmental support. The project documents should be signed by the different government partners to avoid the project being hijacked in case of disagreement from one side. For the moment the project documents are only signed by UNDP and the HOO. The presence of other partners like the MoE, the MoF or other would have given UNDP more weight to deploy its activities beyond the HOO.
No requirement to link the output delivery with financial expenditures	The project has spent more than 8 million USD between 2007 and 2010 and the corresponding expected delivery is lacking. A mechanism might be needed to flag significant variance in spend and output to UNDP management and the Steering Committee.

The review team is concerned that ACT anticipated some of these risks but did not prepare adequate responses to them. The adaptability of a bureaucratic and highly administrative institution like UNDP in a post-conflict environment where the context

changes quickly and where political tensions are common can cause projects to fail. For this reason, risk management should be central in all projects. The stability of staff is key to providing predictability and coherence to the project; this stability could be in part achieved if more room was given to highly qualified Afghans. This would also help in building long-term relations with Afghan authorities. Afghan staff would also be more likely to be able to detect political manipulations.

Lack of focus to all components of project

The review team found that the project management failed to provide simultaneous support to four components of the project. There are two reasons for this. Firstly, the project did not have sufficient staff to deliver the overambitious project. This will be discussed in a later section. Secondly, it seems the project was consumed for almost two years in building a working relationship with the HOO at the cost of inadequate attention to the other components. The involvement of the HOO should not have been seen as a prerequisite to delivery on the other components. For example, conducting VCAs in MoE, MoF, MoI, support to civil society and media are some of the activities under components 2, 3 and 4 of the project which did not require the involvement of HOO. Still these activities were not completed. As a result of lack of ability to integrate inter-related components of project, the expected synergies amongst the components could not be achieved. For example, even if CSOs had been supported to effectively collect public complaints, this would not have been able to bring lasting results without development of line ministry capacity to address these complaints cases.

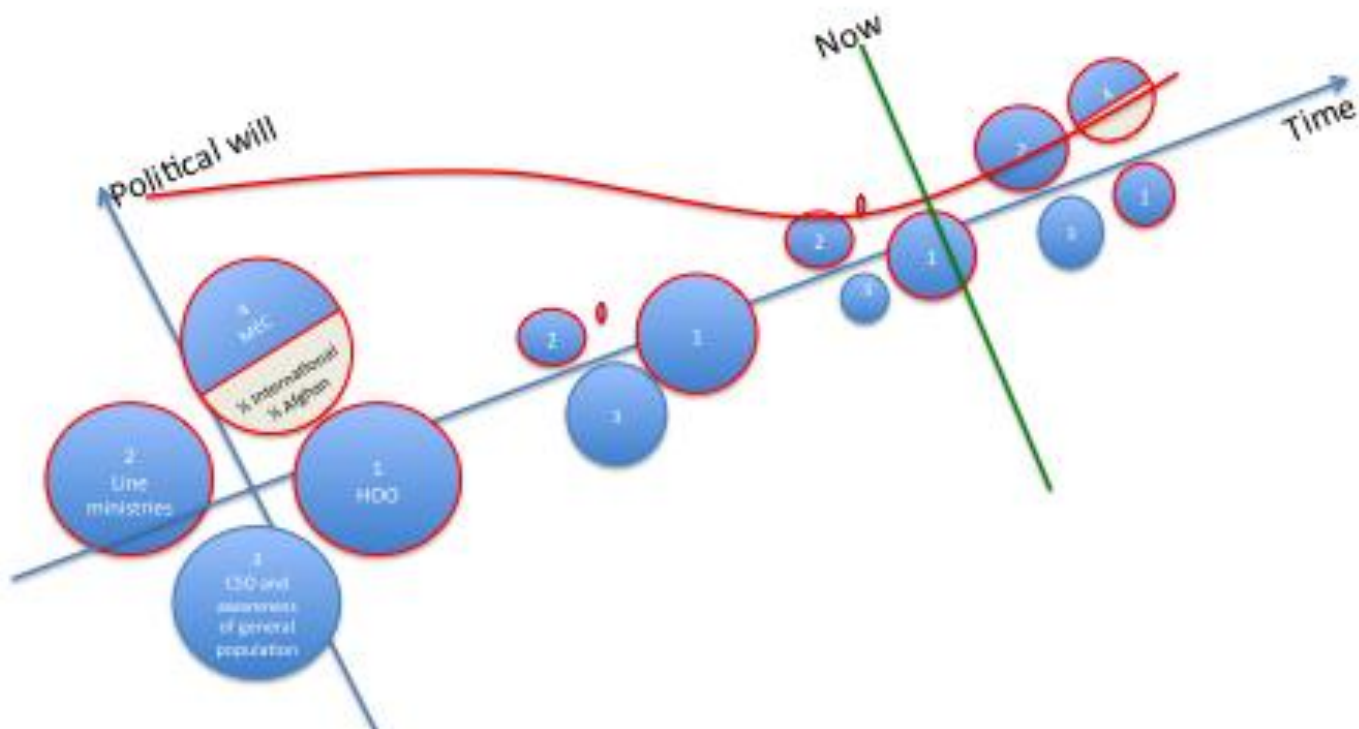


Figure 4: ACT project's evaluation 2009-2011. This figure shows the extent to which each components of the ACT were active. The larger the circles the more they have

delivered. Stage one is how much they should have delivered ideally. The political will is calculated based on the extent to which critical project components were delivering.

Insecurity

Working in a post-conflict country such as Afghanistan poses risks for national and international actors involved in development work. In the Afghan context since 2005 in particular, the environment in which international organisation functions has changed and there are now greater working and living restrictions. The Bakhtar Guesthouse incident in which the UN was targeted had major consequences on all UN projects. This incident took place when the ACT project was beginning its expansion. As a results of this incident UNDP's recruitment was frozen and the number of international staff was limited due to increased security pressure from UNDP New York's headquarter.

Increasing insecurity in the following areas has adversely impacted the delivery of ACT:

- The ACT project was planning to hire 105 staff in 2009 and scaled this down to 41. The recruitment of the new project manager succeeding Nils Taxell was delayed, leaving a period of 8 months of uncertainty in the ACT project. Most international UNDP staff were moved to the green village for security reasons; commuting became a factor of stress and loss of time. It was reported that trip from the green village to the HOO office usually took about 90 minutes in the morning.
- International staff are difficult to find and expensive. The UNDP recruitment process often takes more than 5 months and the international staff rarely remain more than one year in Afghanistan because of the security and living arrangements.
- The expansion of the ACT component in the region was slowed down by insecurity. Authorisation was required to conduct the training sessions and the training sessions were shortened, limiting their possible impact. International staff in most cases are not authorised to travel out of Kabul. The expansion of the project to the sub-national level was done through government partnership but this is a very recent evolution of the project.
- The presence of UNDP staff at the HOO office was drastically reduced for security reasons. This limited the opportunities for direct on-job training. The new building where HOO has recently relocated has security risks. This suggests that the lack of UNDP permanent presence in the HOO and limited contact between HOO and UNDP staff might remain a problem.

Despite the great risk of insecurity, an analysis of the impact of insecurity on the project did not take place. A revision of the project should have taken place after the attack on Bakhtar Guesthouse to include security consequences on the project's implementation. The project aimed to deliver an overambitious output while the international staff couldn't be recruited.

Letters of Agreement

The LOA are used as a contractual tool to provide the Afghan government with staff paid through UNDP funds. It is used in many of UNDP's projects. In the ACT project LOAs are used with the HOO and with the MoE. The staff hired through the LOA report to the Government of Afghanistan. While the LOA mechanism has made it possible to recruit news staff for MoE and HOO, the sustainability and contribution of the newly recruited staff for capacity building varies across these two institutions.

Table 3: LOA Staff Status

	Total	Staffed	End of contracts	Comment
HOO	35	29	May 2010	To be increased to 51 posts until March 2012
MoE	73	29	December 2011	33 staff are in the screening process

During the interviews, we observed that the LOA hiring process was often not properly monitored, as UNDP staff were not directly involved in the recruitment of new staff. This was particularly the case in the HOO. From the interviews, it appears that some pressure was exerted on UNDP from the donors to quickly provide staff to the HOO. As a consequence, the quality of the first wave of staff recruited under the LOA might be weak. The contracts for HOO LOA staff ended 21 May 2011. Although not all the LOA positions were filled –only 19 out of 30 - the number of new positions under LOA has been increased to 50. These 50 contracts are benefiting from better TORs but they will work only for 10 months, until March 2012. The time required to make the interviews, screen the candidates and issue the contracts is likely to exceed 4 months, leaving little time for the new staff to deliver their tasks and provide sufficient capacity building to the institution.

LOA staff are a key entry point to bring capacity into the ministry. They should act as mentor to other civil servants and ensure to transfer their skill. However, the following was observed in the HOO:

- The review team found that it was not possible to evaluate the capacity of staff newly recruited through the LOA. This is mainly because a transparent and merit based mechanism was not systematically followed. There have been some accusations of nepotism from different sides (HOO and UNDP).
- The HOO did not carry out proper monitoring of LOA. The TORs of the LOA were not results-oriented. It is therefore difficult to highlight the areas of contribution of LOA staff.
- Some tensions existed between the staff hired under the LOA and the other civil servants. These tensions were due mainly to salary differentials. The salaries of LOA staff range from USD 600 to USD 3500. The impact of this tension resulted in a lack of cooperation between HOO regular staff and staff hired under LOAs. In some situations, the regular HOO staff blocked some work given or initiated by LOA staff. Thus, the transfer of skills and knowledge between LOA staff and regular staff can be considered to be minimal.
- The LOA staff received only limited training and just a few benefited from training abroad – invitations to conferences are often given to Afghan members of the executive. Opportunities for capacity development were lost.
- Finally, there was no systematic twinning between the staff hired under the LOA and regular civil servants. The twinning could have helped maintain some

capacity in the institution once the LOA system came to an end. With the leadership transition at the head of the HOO, a large number of LOA staff left, leaving nothing for the institution to build on. The impact of ACT in transferring capacity to middle level staff in the HOO is limited.

Insufficient Staffing

The availability of qualified staff on the market is a major constraint to the project. It is difficult to recruit international staff due to ongoing insecurity and in addition it is difficult to find qualified national staff. During the past three years, the project has not been able to hire as many staff as it needed. The project reduced its staffing requirement by 60% from 2009 to 2010 while keeping the same output for the project.

Staff	2009	2010	2011
Planned	105	41	42
Occupied	6	13	27
Vacant	99	28	15
% Occupied	6	32	64

A proper human resource plan has not been developed and this might have helped to identify where staffs cut could be made and when recruitment and TORs needed to be finalised. The plan would need to reflect the complexity of the UNDP recruitment process.

In general, UNDP's recruitment is slow. On average it takes about four to six months to recruit for a position. According to the project, there are about four posts that were advertised in August of 2010, but the process is not completed. The recruitment process involves collaboration between the project unit and UNDP's CO's Human Resources Department. During this process, there are many delays caused by insufficient HR staff on UNDP CO side. In addition to the normal UNDP procedures, UNDP management screening has recently been added. According to this new process the interview panel recommends a candidate for a position through a transparent process then UNDP CO management interview the candidates once again. In some situations UNDP CO management's decisions contradicts interview panel decisions.

There are only 9 technical staff⁶ remaining in the project- only two at a senior level.

Relation between the central office and the project

The country office is supposed to provide oversight and support to the project primarily in the area of human resources and procurement. During our interviews we observed that the role of the country office was not limited to those issues. Senior management of UNDP Country Office informed the review team that the UNDP country director is meeting with the head of the HOO to establish working relations. This blurs lines of

⁶ Source: UNDP-ACT staff list

communication with the project team. The UNDP Country Office and the project should coordinate to ensure clear communication with government counterparts (e.g. expectations around resources and other messages).

Regular reports on the project are provided to the UNDP CO. These reports should reflect the output delivery of the project. As the project began to show some signs of difficulty, the project team would have appreciated advice on technical and strategic direction from the UNDP CO, according to our interviews. Country Office's inputs in term of technical supervision were limited.

Monitoring and controlling

As part of the April 2009 project revision, the mechanism for monitoring and evaluation of the implementation of the project was amended. The amendments aimed to "allow for adjusting the pace and design of the project in a rapidly changing institutional, political and economic environment." The following reflects some of the mechanisms that were proposed in ACT's new monitoring and evaluation framework:

- Internal monitoring to be conducted by the project management team through weekly project management team meetings. Minutes of these meetings are expected to be shared with the UNDP Country Office and interested stakeholders;
- Joint monitoring to be carried out by organising monthly project meetings with relevant government counterparts;
- Activity level monitoring to be preformed by the Project Team Component Cluster;
- The Project Team to develop an overall monitoring and evaluation plan; and
- An external mid-term evaluation of the project will be carried out in the final quarter of 2009.

Monitoring and oversight of the project is extremely weak. Responsibility for ensuring that the project is delivering on the agreed outcomes lies with both the project and CO management. Without basic reporting against the indicators taking place, it seems unlikely that the current management structure is able to ensure delivery of the required outcomes.

The management structure set out in the UNDP project document appears suitable. However, there is little evidence to indicate adequate monitoring of ACT. The project establishes a project board and its membership includes government, donors and UNDP. The board meetings seem more like a formality rather than a platform to guide ACT towards its outputs. The project board met only three times between January 2010 and April 2011. The review team's discussions with senior staff at the MoF and CAO indicate that the MoF and CAO do not understand the purpose of the meetings and, more importantly, were not aware of the support under ACT to their institutions.

There is some indication that the quarterly reporting process narrative is not being sufficiently prioritised. For example, a comparison of the progress reports for the first and second quarters of 2010 shows that many of the sections are almost identical, with just a few words changed. Some issues presumably do not change significantly over three months – but identical texts seems to suggest that the team attach little importance to the quality of reporting. Furthermore, we observed that progress on

activities is not accurately reflected in the reports. Higher progress rates are given to underperforming activities.

		Status
1	Weekly management team meetings Meeting minutes are expected to be made available to the UNDP Country Office and summaries provided to the stakeholders.	Summaries of these are not currently shared with the government.
2	Monthly project component meetings to be carried out jointly with relevant government counterparts. Through these meeting regular feedback from government counterparts on the progress of project implementation to be provided.	Monthly meetings were held. However from our interview, it appears that MoF, CAO, HOO management is not well informed about the project's contribution to their work as stated in the project document.
3	Monitoring and evaluation plan	The plan does not exist.
4	Quarterly and annual progress reports	Reports are prepared. But serious inconsistencies were detected. The delivery rate is actually the percentage remaining in the financial balance.
5	An external mid-term evaluation of the project will be carried out in the final quarter of 2009 to evaluate the project's approach, achievements, and failures.	Significantly delayed and no longer able to act as a mid-term evaluation – this is being carried out in 2011.
6	A final external evaluation of the project will be carried out three months prior to the end of the project.	Pending deadline.
7	An external audit will be conducted at the end of the project to ensure that UNDP resources have been managed, in accordance with the financial regulations, rules and practices and procedures, the project document and project work plans.	Pending deadline. The external audit conducted at the end of the project is not really useful in case problems are detected as it is too late to make adjustments.

ACT's performance was not observed and measured on a regular basis to identify challenges and risks against the annual workplan. Corrective actions were not taken to overcome risks and challenges. In one instance 2009's Annual Workplan (AWP) was revised and the financial delivery target was changed from USD 5,608,530 to USD 2,778,389. This reflected recruitment delays and the fact that it was not feasible to deliver the initial amount envisaged because of the presidential election of 2009. A review of the AWP 2009 and 2010, however, reveals that the output delivery for 2010 was actually not different from 2009 – ie there was no adjustment of deliverables. Thus, although a risk was identified, corrective actions were not taken to adapt the new 2010 AWP to the reality of delivery resulting from the 2009's delays.

UNCAC

Afghanistan signed the UNCAC in 2004 and a law against corruption and bribery was promulgated. The implementation of UNCAC implies that the Afghan institutions should go through a long process of standardisation and homogenisation of their legal framework. This is a complex and challenging process.

Article 5 of the UNCAC imposes an obligation to develop and regularly monitor a coherent and coordinated anti-corruption strategy, and requires the participation of citizens in the planning and implementation of that strategy. The participation of civil

society in monitoring the revision and or implementation of the national anti-corruption strategy is required. Article 13 of UNCAC further calls on the government to promote the active participation of civil society, non-governmental organisations and community-based organisations, in the prevention of, and the fight against, corruption. Public information and education projects are some measures to be undertaken.

Traditionally the UNCAC implementation is monitored by the UNODC. From the review team's interview, we understood that a gap analysis of the Afghan legislation toward the implementation of the UNCAC was conducted in 2008. The analysis examines successively the institutional framework, the preventive measures, criminalisation, investigation, prosecution, trial, sanctions and the asset recovery.

UNODC sponsored Afghan officials to attend the UNCAC conference in Doha. A formal monitoring mechanism should be set-up and a self-assessment checklist should be established by 2013. The Afghan government was slow to implement a code of conduct related to the UNCAC.

Analysis of Spending to date

This analysis is based upon figures provided by UNDP detailing monthly spend in 2009, 2010, and up until May 2011. There are several observations:

First, the *project spending on capital goods and equipment has been significantly higher than we might expect* from a technical assistance and capacity building project.

Second, and perhaps linked to this, the *spending on staffing has been a lower proportion than we would have expected*. This project is largely a technical assistance project – and so we would expect that delivery of the objectives would be associated with “people on the ground”. This is not reflected in the spending data.

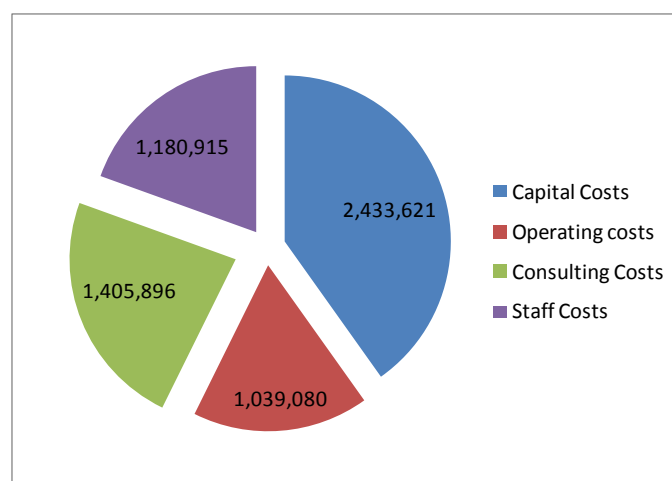
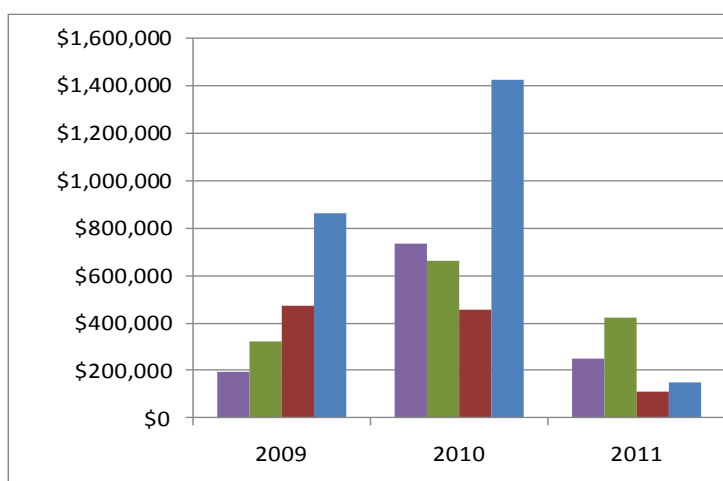
Third, there appears to have been an *extremely heavy bias towards spending in activities 1, 2 and 5, with far less emphasis on activities 3, 4 and 6*. However, we note that some changes in the definitions of activities over the life of the project do not appear to be reflected in changes to the financial reporting, so we may have misunderstood this.

Fourth, the *spending on this project is extremely volatile*. Monthly spending in 2010 ranged from \$1.06 million in June 2010 to \$104,000 in July 2010. Managing this level of spending volatility is difficult for a project – and in turn may be a proxy indicator for difficulties in the planning processes.

Below we set out some additional data and explanation on each of these observations.

Capital and Operating Expenditure

One of the key issues associated with this project is the level of capital and operational costs versus costs associated with “frontline” delivery. The charts below summarise these project expenditures to date. The column chart shows expenditure on capital costs, operating costs, consulting costs and staff costs for each year of the project. The pie chart totals expenditure in these four categories for the project so far.



What is clear from these charts, and the table below, is that the majority of the project spending has been related to project set up, rather than front-end delivery. If, for purposes of simplicity, we accept that all staff time has been related to “front end” delivery this still only amounts to 40% of total expenditure. Just over \$2.4m of the \$6.4m

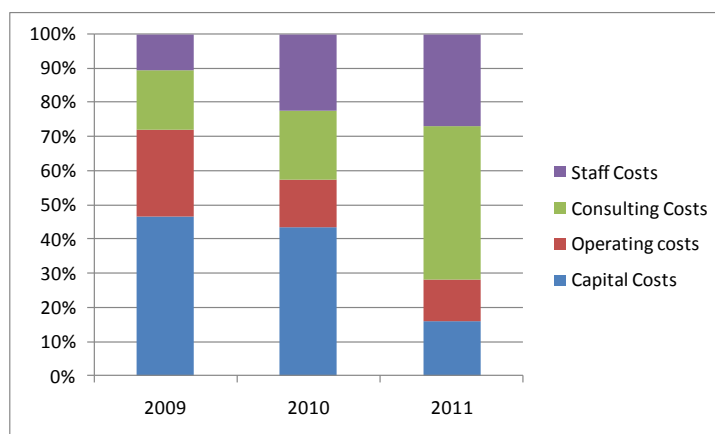
total project spending to date has been on equipment, furniture and IT. This represents significantly more on internal project set up than would be expected for a project of this size.

There are also questions about the timing of the project infrastructure spending. The project is due to come to an end in March 2012. But a large proportion of spending on furniture and IT came in June 2010 – around 20 months prior to the end of the project. Specifically, nearly \$830,000 was spent in June 2010 alone. We would question whether buying new equipment at this point, rather than for example renting equipped office space, represented good value for money. In addition, this spending on furniture, IT and equipment is continuing. To date in 2011, the project has spent a further \$150,000 on furniture, equipment and IT – representing 16% of total spend this year. For activity 4, 30% of the 2011 spend to date has been used for equipment and furniture.

The key recommendations from this are that 1) the project staff carefully consider the need for any further capital and investment expenditure. 2) donors should check that the equipment being purchased is being adequately inventoried, and 3) donors should check that appropriate procedures are in place for disposing of the capital equipment following the project.

Staffing spending

The spending profile also raises questions about the adequacy of staffing for delivery. Project progress reports continually note the difficulties associated with recruitment. This is reflected in the staff and consulting costs. The chart below shows the proportions of spending on operating and capital costs, as well as staff and consulting costs. What can clearly be seen is how little was spent on staffing in 2009 and 2010 as a proportion of total spend. Clearly this has affected the ability of the project to deliver.



More positively, we see that so far in 2011, 72% of project spending has related to staff and consulting expenditure. These are levels far more appropriate for a technical assistance project.

Spending by activity

There have been some changes in the definitions of the project activities⁷. For example, a decision was reported in the second quarter progress report for 2010 to roll the majority of project component 4 into component 3 (see for example, page 13, Second Quarterly Progress Report). It is not entirely clear how these changes have flowed through to the financial reporting, and so we cannot be absolutely sure of our conclusions. However, it appears that considerably more money has been spent on activities 1, 2 and 5 than on other activities. As the table below shows, activities 3 and 6 represent around 1.1% of total spend.

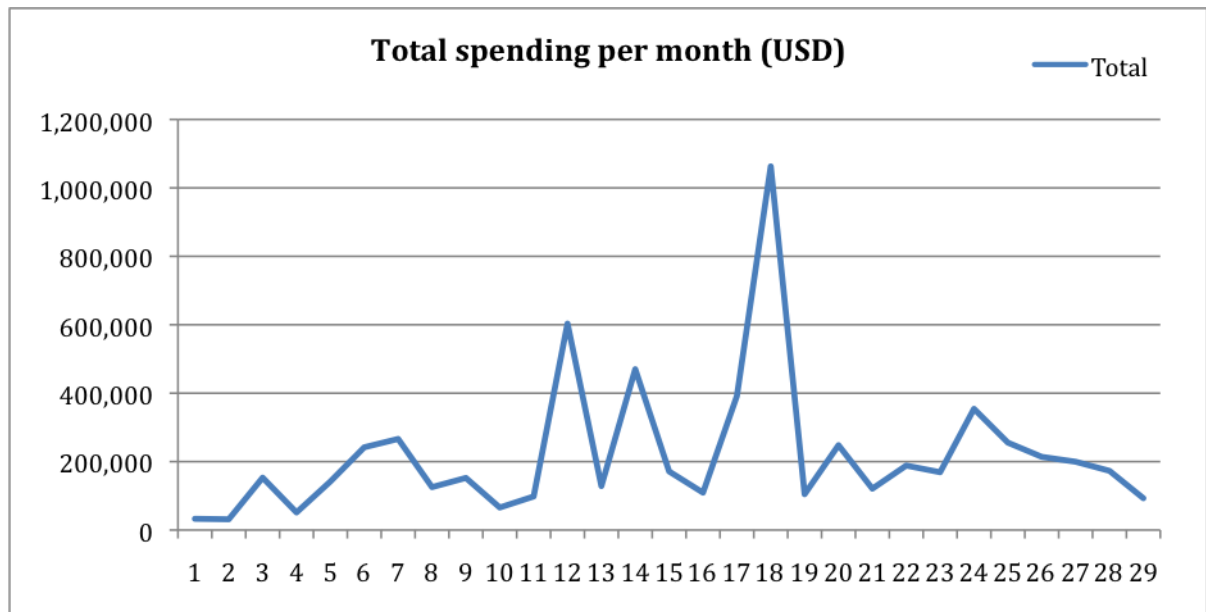
Activity	Spend (US\$)	% of total spend
Activity 1	2,378,297	37.1%
Activity 2	1,767,509	27.5%
Activity 3	66,037	1.0%
Activity 4	344,027	5.4%
Activity 5	1,856,899	28.9%
Activity 6	5,621	0.1%
Total	6,418,390	

This imbalance in spending across the components is not necessarily an issue if there are good reasons. But it might be worth re-examining the smaller components of the project to assess whether they could be rolled into larger components – hence reducing the number of components to manage. Or, considering what could be done to bolster activity in the smaller activities to balance the project between its activities.

Volatility in spending

While we cannot draw any definite conclusions, we also note that the spending on this project and its associated activities is extremely lumpy. For example, the chart below shows the monthly spending on activity 1 throughout the life of the project to date. We would expect a much smoother expenditure profile for a several-year long capacity building and support project. Handling such large fluctuations in monthly spending must be a significant challenge to the project. We would recommend that the project managers look again at the planning processes within the project – to ensure that activity is smoothed over the project.

⁷ Activity 1: National anti-corruption strategy; Activity 2: Internal integrity, Activity 3: Civil society, Activity 4: awareness and education; Activity 5: programme team support, Activity 6: MEC



Conclusions

The review recognises that the UNDP ACT project takes place in one of the most complex and challenging environments in which to tackle corruption. The relationship with counterparts has at times been difficult and the security environment has worsened over the course of the project.

The review scores the project 4 as it found that the project's outputs and purpose are only likely to be achieved to a very limited extent. The purpose to improve the "capacity of national and local government institutions to tackle corruption [is improved], with civil society providing greater demand for reform" is unlikely to be achieved by the end of the project in March 2012 but some outputs show delivery.

ACT's support to improving institutional and policy environment for the implementation of NACS was limited to supporting the establishment of the HOO. ACT has supported the establishment of HOO by paying for logistic matters such purchasing cars and office rental. Furthermore, 29 staff were hired for HOO to bring more technical support to the office and form a base for capacity building and transfer. However, the hired staff were not always hired based on merit and the capacity transfer to the HOO's staff was limited due to tensions emerging between the staffs under LOA and the former HOO staff. The monitoring of their work was also weak. Other support from ACT such as the establishment of inter-institutional protocol, and the capacity assessment of HOO did not take place and corruption monitoring has not been operationalised.

The review team observed minimum results in enhancing the accountability, transparency and integrity of key government institutions. Some encouraging results were observed in the MoE due to ACT's support for the establishment of a new complaints department and the completion of VCA. The CAO has benefited from the work of ACT's international staff. However in other areas, the project has failed to implement key activities planned to enhance the accountability, transparency and integrity of these institutions. Out of four VCAs (MoI, MoE, MoF and CAO) only one was conducted and support to complaint and investigation capacity has not been provided; well-designed trainings are not currently conducted; Integrity Promotion Offices are not established.

ACT supported the establishment of integrity promotion offices (IPO) to deal with corruption. However, the project did not support institutional capacity building of these newly established IPOs. Only the IPO in the MoE is starting to carryout its function regarding the complaint departments.

The knowledge-generating activities such as need assessments and vulnerability to corruption assessments were planned but not conducted, with the exception of the MoE. Specialised anti-corruption training and or on-the-job training were also not provided. Only CAO benefited from the on-job trainings provided by ACT staff on a daily basis. Complaints departments were established in an autonomous manner without formal linkages to HOO, contributing to more confusion in an already complex complaint mechanism environment. There is not collaboration and coordination among complaint departments.

The knowledge of the project from many government counterparts seems weak. This is specially the case in the MoF and CAO. These two institutions were not even aware of outputs that are directly related to their institutions, making it difficult for them to see how they could provide more constructive support to the ACT.

By focusing on priority areas over the remaining duration of the project, it is hoped that the UNDP ACT project will be able to deliver activities already in train and to support work where the greatest political will exists. Coordination with other donors, within government and within the UN will be essential. Most urgent for UNDP management of the project is recruitment of key staff and the capacity building of local staff and government counterparts that in the long term must take this work forward. The review is extremely concerned about yet another possible gap in ACT projects management after the current project manager's departure. The project will end soon and should in the remaining time set the ground for future anti-corruption activities.

This review reveals some challenges beyond the specific ACT project which reflect on UNDP's broader operational approach. This is the case in particular with regard to human resource management, the strategic support between the country office and the project, the management of Letters of Agreement, expenditure and output reporting and the management of security. It is hoped that UNDP Afghanistan can respond to some of these issues which particularly affects its operation in a post conflict environment.

Measurement recommendations

Logframe/ monitoring issues

A set of issues around the monitoring framework need to be addressed. These are:

- The relevance and usefulness of the indicators being used by UNDP in its results framework;
- The extent to which monitoring in the project is against the indicators in the results framework – and the results framework is a management tool, and;
- The extent to which DFID logframe maps onto the UNDP results framework.

Over the remaining life of the project we propose an initial focus on the second and third of these. A focus on these activities would yield the largest improvement in the performance of the project – and in the ability of funders to judge progress – over the shortest time period. Only ten months are left before the end of the project and an entire revision of the project would involve considerably management time, and negotiation from both DFID and UNDP. Not enough time might then be left to implement it. The revision should concentrate on the activities that are progressing well and on the quality of the monitoring.

The review team recommends discussion with UNDP on the measurability of the current indicators. Where these are not measurable they will need to be revised over a shorter timescale. The table below sets out an assessment of which of the current indicators could be used/ easily adapted, and those that should be dropped.

The time remaining before the end of the project, ten months, make it impossible to pause the project during the revision phase. However the little value for money of this project should be addressed.

Ensuring measurement against the UNDP results framework

The review team had a number of concerns about the current UNDP results framework.

- 1) Project reporting is not aligned to agreed indicators
- 2) Indicators and milestones are insufficiently specific to effectively monitor progress
- 3) The formulation of the indicator is sometime imprecise (“a number of ministries”)
- 4) Or the indicator does not capture the extent with which an action initiated is close to completion (“action initiated in tow processes”)

Results/ Goals	Performance Indicators	Baseline info/ target	Implementation progress
Output 1.1 High Office of Oversight enabled to fulfil its mandate	No. of Ministries and government offices that have developed anti-corruption action plans based on the NACS	Baseline – nil 2009 – 5 Feb 2012 – all	A number of ministries and other government institutions prepared and sent their anti-corruption plans.
	No. of admin procedures assessed/ reviewed by the HOO and recommendations for simplification made	Baseline – 1 2009 – 8 Feb 2012 - 68	The project is working with the HOO to establish its Prevention and Public Admin Reform Department to undertake business process simplification in key government institutions. Action initiated in two processes.

If the results framework is to be a useful document – and if there is to be any basis at all for measuring results and value for money - reporting must be conducted against the agreed indicators. This must form the first priority for any movement towards assessing

value for money.

Revision to the indicators

The issues covered by this project are extremely difficult to pin down in terms of quantitative indicators. But the table below, which assesses the project indicators gives a picture of extremely weak indicators across project outputs. The key issue is that the indicators are not measurable – or likely to be measurable. There is no clear solution to this, given the short amount of time remaining on the project.

In particular, it is very unlikely that we will make significant progress to measuring cost/ benefit, or even cost effectiveness particularly given the limited remaining time on this project.

In sum, it may be possible to measure some of the indicators below for the remaining life of this project (those in the table below listed as “no change proposed, or where a simple change could improve the indicator” e.g. 4.1.1 below). The review team does not recommend redesigning the indicators at this point in the project. However, as above, if this project is extended after March 2012, it requires a fundamental redesign if there is to be any chance of achieving value for money. No extension of the project beyond its current life should be considered without this.

Table 1: Assessment of indicators.

Indicator	Useful/ Measurable	Change?
Output level		
Public institutions at central and sub-national level have introduced accountability and integrity mechanisms (including complaints mechanisms)	This is a restatement of the project's aspiration rather than an indicator. It is not possible to measure this in any meaningful sense.	This indicator should be changed or removed. One possible amendment would be to make it very specific - for example that ministries have a specific policy, agreed by the minister, on corruption.
National Anti-corruption strategy developed	Yes – a useful proxy measure. Of course the strategy isn't going to deliver improvements alone – but its a key stage in what will be a long process. The benchmarks however appear to be confused - UN centric and less useful.	No change proposed except to change the benchmarks to a single measurable indicator – for example, NACs adopted by cabinet.
Component indicators		
1.1.1 Number of Ministries and govt offices that have developed anti-corruption action plans based on NACS and reported to HOO on implementation progress	Yes – a good proxy measure of progress.	No change required
1.1.2 Number of protocols of inter-institutional co-ordination for address the combat and prevention of corruption	It is not clear what this means – and this is reflected in the fact that it isn't being reported against.	Suggest removal from the results framework. Adds nothing, and confuses.
2.1.1 number of action plans developed adopted and implemented based on VCAs conducted	This is measurable in discussion with ministries, and does give some proxy measure of progress	Suggest no change.
2.2.1 Percentage of complaints referred within the the ministry/ office investigated and completed at	This is way beyond the current state of the project – complaints mechanisms aren't yet in place, so	Suggest remove.

Indicator	Useful/ Measurable	Change?
year end	it is not a useful indicator	
2.3.1. % of civil servants aware of ministry/ office internal integrity mechanisms and understand and apply the Code of Conduct and Conflict of Interest Policies	There is no mechanism to collect this data, and the indicator is overloaded (what if someone is aware, but not applying the code?).	It is not useful to include a completely unmeasured indicator in the results framework. It should be removed.
2.4.1 % of cases referred to CAO by HOO reviewed and completed by year-end.	Again a composite indicator – very ambitious, and not means of measuring this	Suggest a rethink of this indicator – it is important to have some measure of this given its centrality to the project.
3.1.1 Number of CSOs, youth and media organisations selected for funding through ACT grants facility	This isn't a great indicator – very input based. But it is at least measurable (even though in progress reports UNDP have chosen not to report directly against it)	Keep this indicator in, and ensure that reporting is against it.
3.1.2. Number of CSOs and media organisations receiving funding through ACT-GF achieving targets as per grant agreement	This is not measurable, and therefore not useful. Given the state of internal monitoring within this project we must doubt the ability of the UNDP to monitor the performance of others in the foreseeable future.	Suggest removing this indicator
4.1.1 % of population aware of mechanisms available for reporting cases of corruption.	There is no means for measuring this indicator – and spending the amount it would require to make an estimate of this would not likely be a good use of resources.	Replace with the Integrity Watch Indicator of the % of Afghans who would report corruption – this requires that they are aware of at least one mechanism for reporting corruption
4.2.1 [identical indicator to 4.1.1]	As above	As above

Annexes

Annex 1: ACT AWP Status

Outputs	Indicative Activates	Progress	Status	Achievable before March 2012 ⁸
Component 1: Improved institutional and policy environment created to support the implementation of NACS.				
1.1 High Office of Oversight enabled to fulfill its mandate.	Enhance the capacity of HOO Secretariat/Chief of Staff's Office	Not done as the capacity for many functions of HOO are still weak.		3
1.1.1. Management and administrative capacity of the High Office of Oversight enhanced.	Carry out needs assessment of Administration and Human Resource Departments	An overall assessment of HOO has been done by USAID.		
	Provide capacity development support and on-the-job mentoring support to the Administration and Human Resource Departments	Not fully provided. Staff hired under the LOA structure to support HOO but they didn't get training nor were their work monitored. HOO is still in need of major capacity support.		3

⁸ The grades are subjective, based on the author's experience and assessment of the environment in which the activities are conducted. We are using DFID scoring system.

1.1.2. Capacity of key departments in the High Office of Oversight enhanced through the issuing of Protocols of inter-institutional coordination for addressing the combat and prevention of corruption	Carry out needs assessment for the Strategy, Planning and Oversight Departments	Not done.		3
	Develop capacity development plan and training materials based on the needs assessment.	Not done.		3
	Provide capacity development support and on-the-job mentoring to the staff of the strategy, Planning and Oversight Departments.	Not done.		4
	Support HOO and its Strategy Department in operationalizing the National Anti-Corruption Strategy and develop action plan.	Not done.		3
1.1.3. Strategic national, regional and international partnerships developed.	Facilitate exchange visits of Afghan officials	One trip was organized.		3
1.2. Comprehensive corruption monitoring system established	Establish a survey Unit in the HOO	A unit has not been established. But it is not fully functional and the capacity is weak.		3
	Develop monitoring system for the implementation of NACS	Not done.		4

	Carry out nationwide surveys for general populations, civil servants and business sector	Not done. A questionnaire for civil servant corruption perception has been developed and the field research will start at the end of May, 2011.		4
	Conduct Focus group discussion	Not done.		3
	Conduct case studies	Not done		3
Outputs	Indicative Activates	Progress	Status	Achievable before March 2012
Component 2: Enhance Accountability, transparency and Integrity in key government institutions				
2.1: Vices completed and recommendations integrated in on-going technical assistance in four government institutions.	Conduct VCAs in Ministry of Education, Ministry of Interior, a municipality and CAO.	VCA was completed for Ministry of Education. The process was participatory and staff from the other ministries participated in the process. However 3 other VCAs are not completed. Recruiting MoI VCA consultant. The work on municipality has not initiated.		2
	Develop action plans for implementation of the VCA recommendations	Not done. Initial action plan for MoE developed.		3

2.2: Complaints and investigation capacity established/developed in four government institutions	Carry out the review of complaints and investigation mechanisms at the central and sub-national level in Ministry of Education, MoF, MoI.	Review of complaint and investigation system at MoE and MoF have been completed.		3
2.2.1: development of training manual for the Complaints Offices in 3 ministries.	Develop recommendations/action-plan for strengthening the structure and organization of complaints and investigation mechanisms.	Consultations with the staff of MoF but no formal assessment.		4
	Provide capacity development support and on-the-job mentoring to the staff and on other complaints and investigation mechanisms in the miniseries/offices at the central and sub-national level.	Not done however a few workshops were organized about AC in general.		4
	Develop complaints management software.	Not done. A plan of the software was developed. The procurement process for developing the software for the MoF has started.		2
	Provide IT/communication equipment for handling complaints and investigation in MoE, MoF, MoI.	Not done.		3

	Establish linkages with the network of civil society actors to serve as complaints recipients and forwarding channel.	Not done. A few CSO networks were established but no complaints are received from CSOs.		
	Train the civil society network and IPOs on handling of the complaints	Not done. A one day preliminary workshop was conducted for 6 CSOs in this regard.		2
2.3 Integrity Promotion Offices established in four government institutions.	Establish IPOs in MoE, MoF, and MoI.	IPO are not established. Agreements were signed between ACT and MoE and MoF for establishing IPOs. Discussions are on-going for an agreement to established IPO in MoI.		2
	Through IPOs, support the ministries in developing action plans taking into account the NACS, Vices and sector surveys.	Not done.		3
	Develop capacity of IPOs to support the efforts of HOO in the respective ministries/office.	Not done/ political tension between the HOO and the other ministries/no inter-institutional agreements were signed.		4

	Provide training to civil servants in the ministries and sub-national on anti-corruption, ethics and conflict of interest.	A few trainings (2-3) were provided in HOO, MoE, MoF, CSOs.		3
	Carry out information campaign at the central and sub-national level for general population and civil servants in the ministries/offices on the on-going efforts to prevent corruption.	Not done. Anti-corruption posters were developed but not disseminated as per instructions from UNAMA.		2
	Ensure that IPOs are integrated into the permanent structure of the ministries/office.	Not done.		3
	Ensure the IPO plays oversight role over the complaints resolution process and its links to civil society.	Not done. The recruitments of UNDP staff for IPO under process.		4
	Develop counseling mechanism to public officials facing questions on ethics and conflict of interest cases.	Not done.		
	Support the coordination and collaboration between the HOO and relevant ministries for the implementation of the NACS.	Inter-institutional working group is established. 3-4 meetings have been conducted.		3
	Follow-up on field complaints with FIU and HOO.	Not done.		3

2.4. Capacity of the Control Audit Office to detect corruption and fraud strengthened.	Carry out review of existing financial and auditing procedures to assess effectiveness in deterring and detecting fraud and corruption.	Some work has been done.		2
	Carry out needs assessment of relevant CAO staff.	Not conducted completely but workshops were organized to measure the CAO staff's needs		2
	Develop capacity development plan and training materials based on needs assessment.	Some trainings were offered but they are not based on the needs of CAO and they still many specialized trainings.		2
	Provide capacity development support and on-the-job mentoring to relevant CAO staff to implement relevant financial audit and performance audit procedures	Different workshops were organized but on-job-mentoring for the procedures are pending for the new audit law to be passed.		2
	Facilitate participation in relevant trainings and exchange visits to develop the capacity of relevant CAO staff	Not done. Only two CAO staff traveled to Banking for a short training.		2

	Support training facilities with equipment and furniture	Not done. (check budget break-down)		2
Outputs	Indicative Activates	Progress	Status	Achievable before March 2012
Component 3: Increased Awareness and Understanding amongst the public and enhance capacity of civil society and media to effectively contribute to the fight against corruption				
3.1. Awareness raising campaign materials for the general public developed and distributed to raise understanding of general public about corruption and their role in the fith against corruption	Develop campaign plan in collaboration with HOO	Not done. A new consultant will work on a campaign plan.		3
	Develop awareness-raising campaign in collaboration with HOO and disseminate nationwide	Not done. AC posters were developed but not disseminated due to concern from UNAMA about their messages.		3
	Hold celebration of international anti-corruption day	Completed.		

	Conduct assessment of awareness impact through questions and answers to participants, addressing all anti-corruption measures to be undertaken.	Not done.		4
3.2. Training module on the role of public representatives in the fight against corruption developed and capacity building training delivered to members of parliament and provincial councils	Develop training module on anti-corruption for members of parliament and provincial councils.	Not done. Plan to hire an international consultant. The UNDP process took too long. The position was re-announced a couple of time.		3
	Conduct training of trainers workshops	Not done.		3
	Ensure that training modules are mainstreamed in on-going training activities delivered at the central and sub-national level	Not done. Plan to work with ASGP workshop but since the modules and trainers not done so couldn't work on this.		
3.3. Training modules on the operational role of civil society in public complaints processing, monitoring public service delivery, research and advocacy, and access to information developed and trainings delivered (linked to output 2.2)	Conduct needs assessment for CSOs, youth and media organizations involved in getting involved in the fight against corruption	2 workshops in Herat, 2-3 in MoF, 2 in MoE workshops conducted with the members of CSOs regarding their needs and role in fight corruption.		3

	Develop capacity development plan for CSOs, youth and media organizations	Not done.		3
	Develop training materials aimed at increasing the capacity of selected organizations to increase their involvement in the fight against corruption.	ACT developed an integrity manual in 2008-2009.		2
	Conduct training workshops at the central and sub-national level.	Not done. Training provided in Herat, in Kabul.		3
3.4. Civil society and media networks established, guidelines for complaints processing by CSOs developed, and training manual on technical assessment of government institutions developed	Hold consultations with CSOs, youth, media organizations and gov't	Done.		
	Develop plan for engagement/collaboration between HOO/the government and CSOs, youth and media organization to fight against corruption	Not done. HOO was not ready to engage with CSO. The process has started now.		2
	Establish 4 AC networks one each working on complaints follow up and facilitations	Not done. 2 proposals have been better. In the selection process.		2

Output 3.5: Civil society networks receive grants through the accountability and Transparency Grant Facility in order to establish operational channels of engagement with the state.	Conduct awareness raising sessions on ACT-GF during capacity building workshops	Some information shared.		2
	Select 5-6 CSOs, youth and medial organizations per year to receive grants through the ACT Grants Facility.	Not done. Proposals have been received. A technical assistance committee has been selected.		2
	Conduct annual evaluation lessons learned workshop to assess level of success and impact of activities carried out by grants recipients	Not done.		2
	Carryout assessment of the projects implemented by CSOs to determined the effectiveness of the project	Not done.		2
Outputs	Indicative Activates	Progress	Status	Achievable before March 2012

Component 4: Enhanced independent monitoring of anti-corruption efforts undertaken by government and civil society

Output 4.1: An executive secretariat of the MEC established with institutional channels developed to link with independent technical sources of information from HOO, civil society and private sector networks	Conduct training needs assessment amongst the MEC technical staff	Not completed. The process which has started is on-going.		2
	Develop training modules on AC practices	Not done.		2
	Conduct training for the future trainers.	Not done.		2
	Ensure that training modules are compatible with best practices applied to institutional assessment of corruption levels.	Not done.		3
Output 4.2: The capacity development of a civil society board achieved.	Conduct 6 trainings for civil associations and private sector networks	Three workshop for ACCI		2
	Conduct training of trainers for civil associations	Not done.		2
Output 4.3: The formation, capacity development, and training of an operational private sector business board.	Conduct 6 trainings for civil associations and private sector.	Not done.		2

	Conduct training of trainers for private sector and civil associations	Not done.		2
Output 4.4: Stakeholders group established	Organize frequent meeting forums and roundtables include key stakeholders	Not done		2
	Conduct 4 forums with stakeholders providing state of the policy implementation status	Not done		3
	Conduct training of trainers for private sector and civil associations.	Not done		3

Annex 2: Spending Data

Detailed Staff and Consultant Costs				
	2009	2010	2011	Totals
Activity 1				
local consultants	49,400	25,040	-1,041	73,399
international consultants	65,270	89,910	0	155,180
contractual services individual	10,221	40,081	0	50,302
total consulting costs	124,891	155,031	-1,041	278,881
total staff and consultant costs	124,891	343,570	79,442	547,903
Activity 2 for Ministries				
local consultants	4,400	9,150	0	13,550
international consultants	-6,753	60,016	14,124	67,387
contractual services individual	37,307	94,176	44,726	176,209
total consulting costs	34,954	163,342	58,850	257,146
total staff and consultant costs	34,955	465,566	154,490	655,011
Activity 2 not for ministries				0
local consultants	-1,375	0	60	-1,315
international consultants	0	2,700	-930	1,770
contractual services individual	166,130	150,375	99,641	416,146
total consulting costs	164,755	153,075	98,771	416,601
total staff and consultant costs	361,060	395,686	173,883	930,629
Other consultant and staff costs				0
contractual services individual	66	136,608	157,044	293,718
contractual services individual	130	52,051	107,369	159,550
total consulting costs	196	188,659	264,413	453,268

total staff and consultant costs	196	188,659	264,413	453,268
Totals				
Total staff costs	196,306	733,374	251,235	1,180,915
total consulting costs	324,796	660,107	420,993	1,405,896
total consultant and staff costs	521,102	1,393,481	672,228	2,586,811

Operational and Capital Costs				
	2009	2010	2011	Total
Capital costs	861,288	1,422,754	149,579	2,433,621
Operational costs activity 1	238,972	301,396	49,381	589,749
Operation costs activity 2	97,090	45,570	18,106	160,766
Operational costs activities 3,4,5,6	134,027	109,068	45,470	288,565
GMS	111,788	246,671	421	358,880
Totals	1,445,174	2,127,469	264,968	3,831,581

Overall Summary Spending Data

	2009	2010	2011	Totals
Capital Costs	861,288	1,422,754	149,579	2,433,621
Operating costs	470,089	456,034	112,957	1,039,080
Consulting Costs	324,796	660,107	420,993	1,405,896
Staff Costs	196,306	733,374	251,235	1,180,915
Total	1,854,488	3,274,279	936,775	6,059,512

Annex 3: Interview List

	Organization	Name	Meeting time
1	UNDP	Shervin Majlessi	07-May
2		Massood Amer	11-May
3		Ikram Afzali	10-May
4		Fazal Ahmad Rahel	10-May
5		Ahmad Wali Qaderi	09-May
6		Jan-Jilles van der Hoeven	14-May
7		Neelesh Kumar Sah	09-May
8	Ex UNDP	Nils Taxell	-
9	Ex UNDP	Edgardo Buscaglia	01-Jun
10	UNODC	Heather Barr	11-May
11	HOO	Sharif Rhapoo	08-May
12		M.Khuranji	09-May
13		Zahir Rasol	08-May
14		M. Ariai	10-May
15		M. Fakherzad (LOA)	17-May
16	Norway	Bjorn Klouman Bekken	16-May
17	CIDA	Crystal Procyshen	11-May
18	DFID	Aislin Baker	12-May
19		Kevin Leitch	12-May
20		Juliet Field	12-May
21	Denmark	Nazar Ahmad Shah	11-May
22	USAID	Jim Wasserstrom	08-May
23	CAO	M. Hussaini	21-May
24	MoF	Abdul Razaq Vahidi	21-May
25	MoEdu	Mohammad Ghani	17-May
26	MEC	M.Ossmani	16-May

Annex 4: Methodology

The objective of this assignment was to undertake a joint donor annual review of the UNDP ACT Project in accordance with DFID's programme management procedures and other donor requirements.

The main purpose of this assignment included providing the followings: (i) assess the extent to which the project goal, purpose and outputs are likely to be met at the end of the programme and (ii) make recommendations for improvements to the programme management of the project, and (iii) make recommendations for future donor support to the relevant institutions following the end of the Project in March 2012. This evaluation covered the period of January 2010- March 2011. For contextual reasons; we also considered some activities conducted by the ACT in 2009.

The evaluation team covered the following areas:

- Management: UNDP's overall management of the project, including risk management and review of the 2010 Annual Review recommendations
- Summary Annual Review March 2011: Ensure that all the recommendations and action points for the annual review team are delivered as part of the multi-donor review process.
- Structure: Assessing the overall structure of the project and whether the balance of components is optimal to handle the risks inherent in the difficult political environment.
- Coordination: The organizational and governance arrangements, which oversee the implementation of the project and the coordination between UNDP, Government and donors and other anticorruption initiatives.
- Logframe: revised indicators and revise the logframe.
- UNCAC (UN Convention Against Corruption) assessments of Ministries: review the relevance and assess the feasibility of conducting these assessments, and identify what support would be required.
- Economic analysis. The data provided by UNDP didn't allow us to go much in depth in UNDP ACT spending patterns.

Because of the size and complexity of corruption issues, the team also evaluated issues such as implementation modalities, capacities building, processes established to ensure national ownership and sustainability of the project.

The Process

Not much monitoring data is currently being collected for the UNDP project at the outcome level and, as a consequence, the evaluation was heavily based on interviews and reporting documents of the project. For most of the indicators, a reliable baseline does not exist, and this made it particularly difficult to measure the impact. Triangulation was used, asking similar questions of parties on different sides of the development partnership with a view to determining results.

Desk Study

A review of relevant strategic documents on anti-corruption was carried out. Additionally, all documents to show ACT's activities over the past three years were reviewed. The following is a list of

documents that were reviewed by the team:

The National Anti-Corruption Strategy

ACT's documents:

- Quarterly and Annual Report
- AWP, 2009, 2010, 2011
- HR and Procurement Plans 2009, 2010, 2010
- Budget breakdowns for 2009, 2010, 2011

Interviews

Semi-structured interviews were conducted with a range of key national and international actors involved in the anti-corruption efforts. These included:

- Government institutions: HOO, MoF, MoE, CAO, MEC
- Civil society leaders
- UNDP
- Donors of ACT program: DFID, CIDA, Norway, Denmark
- Other international organization such as UNODC, USAID.

Field Visits

In order to observe the contribution of the ACT for promoting capacity building for the Afghan institutions, field visits were organised. Offices established with the support from ACT were visited and interviews were carried for staff from different levels of responsibility. The review team visited the following institutions:

- Ministry of Finance, Complaints Office
- CAO
- Ministry of Education, Complaints Office
- ACT Project Office in the UNDP Elect compound
- HOO (Deputy of HOO, strategic and planning departments, procedure simplification unit, LOA management unit)

Limitation of the methodology

The evaluation team had to compensate for several inherent limitations in the methodology adopted resulting both from process and design of monitoring and evaluation systems.

- Absence of baseline data in any of the outcome.
- Lack of consistent attempts to identify and collect data on outcome indicators by ACT
- Lack of sufficient breakdown information in budget expenditures provided by UNDP
- Lack of sufficient details in project staffing documents