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**UNDP Management Response to the Final Evaluation of Anti-Corruption for Peaceful and Inclusive Societies (ACPIS) Global Project (2016-2020)**

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**General Response:**

UNDP is pleased to present a management response to the independent evaluation of UNDP’s Anti-Corruption for Peaceful and Inclusive Societies (ACPIS) Global Project. We value the findings and recommendations of this independent evaluation, given that anti-corruption work is a priority for UNDP in its Strategic Plan (2018-2021), its support to the implementation of the 2030 Agenda for Sustainable Development, and its focus on leveraging innovation and technology for preventing corruption and promoting transparency, accountability and integrity for sustainable development.

This final evaluation is a critical reference point to UNDP in light of its plans to develop the next phase of UNDP’s Anti-Corruption Global Programme for 2022-2025, as part of UNDP’s broader governance offer in support of the UNDP Strategic Plan 2022-2025. It is a timely endeavor that will inform UNDP’s Anti-Corruption Global Programme for the next four years.

The UNDP management recognises the efforts of this evaluation in collecting data, evidence and opinions of UNDP experts and donor and programme partners to review the progress and results of the ACPIS Global Project. UNDP management welcomes the findings and recommendations of the independent evaluation, which recognizes that:

* **Overall, UNDP has an added-value that no other organisation can provide in anti-corruption work**. It has developed a critical position in the global anti-corruption architecture that has enabled it to integrate anti-corruption work across development areas and to build partnerships that allow for a broad and unique global network.
* **ACPIS has led the drive to integrate anti-corruption measures across development areas related to specific service delivery sectors, such as education, health, justice, and others.** In particular, amid the COVID-19 pandemic, ACPIS was able to quickly scale-up its work in the health sector and promote the application of anti-corruption tools as governments rolled out significant response and recovery plans.
* **ACPIS incubated innovative social accountability initiatives in selected countries in the Asia-Pacific region that have had knock-on effects, results and impact at the national level**. Significant efforts were made to ensure that the work of ACPIS was inclusive and this can be seen not only in the beneficiaries of the work of the Global Programme, but also in its outputs, where the role of women and youth in anti-corruption dialogue were promoted through projects and activities.
* **Through an enhanced and robust relationship with UNODC, ACPIS continued UNDP’s work in supporting national governments to adopt anti-corruption standards and frameworks.** In addition, ACPIS leveraged the 2030 Agenda and the SDGs for even more results on the ground. In a number of countries, including Myanmar and Papua New Guinea, ACPIS has been instrumental in working with UNDP Country Offices to support their work with national partners to establish and improve national legal frameworks and institutional arrangements for anti-corruption.
* **ACPIS continued to play a leadership role in the global anti-corruption community** by promoting new ideas, approaches and tools, and testing and trying such systems on a scale that allows for expansion where they are seen to be effective. This can be seen through the support provided by ACPIS to UNDP’s leadership to engage on anti-corruption within the UN system, such as through the UN Global Task Force on Corruption and during the UN General Assembly Special Session on Corruption held in June 2021. Outside of the UN system, ACPIS continues to build and maintain strong partnerships with multilateral organisations, governments, civil society and the private sector to advocate for the integration of anti-corruption in all areas of development.
* **The success of ACPIS in achieving results is directly linked to the structure under which it is implemented.** Guided by a small, highly professional team based in Singapore, the Global Programme was nimble in its ability to respond to the shifting demands as the programme was implemented. In addition to the COVID-19 pandemic pivot previously noted, and the need to support the UN-wide coordination on the topic, ACPIS was able to leverage trusted relationships within and outside UNDP to offer technical expertise and knowledge that is far greater than would be expected of a small team of full-time staff supporting the programme. Again, the nurturing of partnerships has been critical to this approach.
* **ACPIS has become what one expects of a mature Global Programme**, with a focus on the needs of beneficiaries and an alignment with their priorities. Such inputs include: *Knowledge Broker, Technical Assistance Provider, Incubator, Facilitator, Thought Leader,* and *Knowledge Manager*.

UNDP agrees with most of the recommendations made by the independent evaluation and expresses its commitment to ensuring continued policy and programme support on anti-corruption globally, particularly to support the implementation of UNDP’s new Strategic Plan (2022-2025) and the 2030 Agenda for Sustainable Development.

Taking into account the recommendations of this review, UNDP commits that in the next phase of its anti-corruption policy and programmatic support work, it will further strengthen and streamline, within available and resources, the management structure and capacity of the global and regional anti-corruption teams, the scale of the interventions and the ability to create a global impact, and the integration of anti-corruption across all development areas.

UNDP will ensure a global reach, maintain an active Global Community of Practice, strengthen partnerships with donor and programme partners, facilitate experience and knowledge-sharing among different regions, and prioritize the following areas in which UNDP has comparative advantages: support for the implementation of the 2030 Agenda, social accountability, integrity, technology and innovation, and business integrity.

The next phase of UNDP’s global anti-corruption work (2022-2025) will focus on leveraging innovation and technology as an entry point to strengthen anti-corruption integration in other development areas, and strengthening evidence-based policy and programming on anti-corruption. It will also design and implement an effective joint response by donor and programme partners to upscale and sustain anti-corruption results.

More detailed responses to the recommendations are provided below. UNDP will ensure that the follow-up actions to most of these recommendations will be implemented during the second half of 2021 and in the next phase of UNDP’s anti-corruption policy and programmatic support work which commences at the beginning of 2022.

**Responses to specific recommendations:**

**High Priority**

* **Recommendation 1: Establish a Global Integrity Fund, managed by UNDP, that will be a facility for supporting innovative ideas on integration of anti-corruption into development objectives and SDG implementation.**

Similar in concept to the Global Environment Fund, REDD+ or the Global Climate Fund, anti-corruption, as a field, requires a well-funded facility that will support national and regional initiatives that promote the integration of integrity and anti-corruption into all aspects of development work and the current efforts to implement and achieve the SDGs. Such a fund would allow for the best elements of ACPIS – high quality technical capacity, thought leadership, knowledge brokering, pilot projects, nimble/adaptive programming – with the limited architecture and financial resources that can transform how anti-corruption is considered in an integrated manner for development. **MEDIUM-TERM**

**Response:** At the beginning of 2021, UNDP started developing the next phase of its global anti-corruption programming for 2022-2025. The idea to establish a Global Integrity Fund is in line with UNDP’s thinking to build on its 3 generations of Global Anti-Corruption Programmes and develop an Anti-Corruption Innovation Facility to support innovative initiatives which integrate anti-corruption across development objectives and SDG implementation. The next phase of global anti-corruption programming for 2022-2025 will be aligned with UNDP’s new Strategic Plan for 2022-2025 and its main three directions: 1) Structural transformation, particularly green, inclusive and digital transitions; 2) Leaving no-one behind, a rights-based approach centered on human agency and human development; and 3) Building resilience to respond to systemic uncertainty and risk.

The next phase of global anti-corruption programming is being developed in close consultation with experts within UNDP and the UN system, as well as with donor and programme partners. The Global Anti-Corruption Team will also draw on the results of the Anti-Corruption Portfolio and Demand Analysis conducted in early-2020 with 127 staff from UNDP Regional Hubs and Country Offices, as well as of the outcomes of discussions at the 2020 ACPIS Board Meeting (February 2021) and ACPIS Global Programme Retreat (April 2021).

* **Recommendation 2: Continue to identify cutting edge ideas and approaches to anti-corruption work that can be piloted for real world application, but with the intent of identifying those that can be scaled up/replicated.**

ACPIS did significant work in testing the use of technology and sectoral support to anti-corruption and integrity. This work should continue, but should be based on identifying and promoting new methods or ideas related to the next stages of anti-corruption work. This should also include a clear plan and sufficient resources to ensure the piloted projects are evaluated and promoted for replication or scaling up. This may require pilot projects that require more resources than were made available for pilots under ACPIS**. IMMEDIATE**

**Response**:

In May 2021, UNDP’s ACPIS Global Project launched its **Anti-Corruption Innovation Initiative**, with support from Norad and Sida. The main objective of the initiative is ***to promote transparency, accountability and anti-corruption through technology and innovation to build forward better and accelerate the achievement of the SDGs*.** A Call for Expressions of Interest (EOIs) invited UNDP Country Offices (COs) in Africa and Asia-Pacific regions to submit innovative project proposals to apply for resources of **up to US$500,000** for a project duration of 24-30 months. This initiative builds on the pilot initiative that ACPIS had undertaken since 2012 and aims to ensure long-lasting impact at the country level by providing sufficient resources and time, and by building stronger partnerships and ownership at the national level.

The themes of the Anti-Corruption Innovation Initiative are clustered around **five areas of anti-corruption work:**

Cluster 1: Technology and innovation for integrity in the health sector

Cluster 2: Technology and innovation for public procurement reform

Cluster 3: Open data innovation for transparent beneficial ownership

Cluster 4: Innovation for integrity in climate, biodiversity and environment initiatives

Cluster 5: Digital tools to accelerate measurement & monitoring of anti-corruption targets in SDG 16

Through a competitive process, **24 Country Offices** (17 from Africa and 7 from Asia) submitted their project proposals. The Advisory and Peer Review Committee composed of experts from Norad, Sida, U4, UNODC, and UNDP (anti-corruption and thematic areas) recommended **8 Country Offices** (4 from Africa and 4 from Asia) for immediate funding. Given that the ACPIS Global Project’s resource mobilization activities are ongoing as the programme team continues to shape the next phase of its global anti-corruption programmatic work, the ACPIS team will continue working with COs, which were not selected for immediate funding in July 2021, to revise and finalize their proposals for possible funding in the next phase of the Global Programme starting in 2022. The Anti-Corruption Innovation Initiative therefore serves as the basis which will further strengthen and promote the next phase of the global anti-corruption programming and UNDP’s Anti-Corruption Innovation Facility.

* **Recommendation 3: Invest in a robust UNDP internal Community of Practice to support, inform and link anti-corruption expertise within the organisation**

Communities of practice have previously been perceived as costly and less than optimal with regard to results, but post-pandemic there is the opportunity to redefine the concept based on multi-faceted approach and the use of different tools, including digital ones, to ensure UNDPs technical experts in the field of anti-corruption at the global, regional and country levels are well-connected and able to access the new knowledge being generated globally by UNDP. As staff have adapted to more remote learning and experience sharing due to the Pandemic, there is an opportunity to transfer some work that was done only in-person through workshops to online discussions and courses that can be completed both in a synchronous and asynchronous manner. **IMMEDIATE**

**Response**: In early 2019, as part of UNDP’s policy and programme support, UNDP established its Global Policy Network (GPN), bringing together various thematic areas, including governance, into one connected network.The vision of UNDP’s GPN is to become the cutting-edge provider of timely development advice, providing support to COs and programme countries in an integrated and coherent manner and to instantly connect countries to a world of knowledge, resources and networks of best practice they need to achieve development breakthroughs. As part of the GPN, UNDP established seven Communities of Practice, aligned with the six signature solutions and the SDG Integration mandate.

The Anti-Corruption Community of Practice, which is a part of UNDP’s CoP on Governance, has a long history, and comprises UNDP’s staff at global, regional and country levels, as well as UNDP’s programme and donor partners. Since 2003, UNDP has organised Regional and Global Community of Practice Meetings to strengthen its policy and programme architecture. In 2019, UNDP organized two Regional Anti-Corruption Community of Practice Meetings (Europe and CIS region in May; and Asia-Pacific region in June). ACPIS and the next phase of UNDP’s global anti-corruption programming will continue to coordinate and facilitate the Anti-Corruption Community of Practice, including regional- and country-level networks on anti-corruption.

The ACPIS team further strengthened a global anti-corruption architecture within UNDP by closely engaging with Anti-Corruption and Governance Advisors in all regions, and by working with various teams from other thematic areas within UNDP such as the Health team and Conflict Prevention, Peacebuilidng and Responsive Institutions team to integrate anti-corruption in various development areas.

In March 2020, ACPIS carried out an ‘Anti-Corruption Global Community of Practice Survey 2020’, a portfolio and demand analysis to assess the existing anti-corruption work, demands, gaps and priorities among UNDP Regional Hubs and Country Offices. 127 governance, SDG 16 and anti-corruption focal points from UNDP Country Offices, Regional Hubs, Global Policy Centres and Headquarters participated in this survey. All regions were more or less equally represented, and 54% of the total respondents were women. The findings of the Anti-Corruption Portfolio and Demand Analysis demonstrate that anti-corruption has been well integrated into governance projects/programmes (71.6% of respondents) such as rule of law, public administration, access to justice and human rights, and integrated into other development areas (40.2% of respondents), particularly in service delivery sectors (e.g. health, education, water, etc.), women’s empowerment, and SDG integration/acceleration initiatives. The top priority for anti-corruption work is in resource mobilisation, as identified by 63.0% of respondents, followed by capacity development and advisory support. 59.3% of respondents highlighted that there is a lack of sustainable resources on anti-corruption, whether in terms of financial resources or technical capacity, both at country and regional levels.

In addition, amid the COVID-19 pandemic, ACPIS realigned its policy and programme support to maximise the impact of its activities and provide guidance to Regional Hubs and Country Offices on how to realign their anti-corruption work to adapt to new realities. ACPIS further expanded its collaboration with UNDP governance and anti-corruption teams across all regions, Global Policy Centres (e.g. Oslo Governance Centre, Seoul Policy Centre) other UNDP teams (e.g. Health, SDG Integration, Conflict Prevention, Peacebuilding and Responsive Institutions), UN agencies (e.g. UNODC, WHO and UNSSC), donor partners (e.g. Norad, Sida) and programme partners (Transparency International, U4 Anti-Corruption Resource Centre) to create more integrated anti-corruption solutions to respond to and recover from COVID-19 and build forward better.

* **Recommendation 4: Continue to integrate anti-corruption principles and approaches into the broader UN development agenda**

ACPIS has made significant progress in integrating anti-corruption values into the broader development of agenda for UNDP and the UN-system in general. This work must continue and is buoyed by the anticipated direction of the next UNDP Strategic Plan that is likely to focus on SDG-16 and the need for addressing governance barriers to the implementation of the SDGs. This work should include a three-pronged approach –

* Supporting UNDP leadership in the UN system coordination related to anti-corruption efforts;
* Taking a leadership role within the broader AC community in promoting further integration; and
* Identifying pilot countries which are receptive to such integration and providing the resources and technical support required to test and try sector-level and country-level integration.

**IMMEDIATE**

**Response:**

UNDP, UNODC and UN/DPPA are co-chairs of the UN Global Task Force on Corruption. The Task Force aims to strengthen a One UN approach in addressing global corruption challenges. The ‘[UN Common Position to Address Global Corruption](https://ungass2021.unodc.org/uploads/ungass2021/documents/session1/contributions/UN_Common_Position_to_Address_Global_Corruption_Towards_UNGASS2021.pdf)’ was developed by the Global Task Force to establish a common framework for the United Nations system to support Member States to prevent and respond to corruption challenges.

To promote the integration of anti-corruption within the UN system, UNDP will continue working together with UN Staff System College and UNODC to train UN Staff and other practitioners through the flagship five-week online course [‘Anti-Corruption in the Context of the 2030 Agenda for Sustainable Development’](https://unssc.org/courses/anti-corruption-context-2030-agenda-november-december-2020/), which provides guidance on integrating anti-corruption in the SDGs and implementing anti-corruption targets in SDG 16. In 2019 and 2020, ACPIS also trained more than 400 practitioners, representing governments, the private sector, civil society, academia, international organisations and UN agencies, through this course.

In addition, the ACPIS team works closely with the WHO, the Global Fund and the World Bank as part of the Coalition on Anti-Corruption, Transparency and Accountability for Health (CATCH) to address corruption in the health sector. The CATCH initiative is being implemented in 2021 with funding from Norad. UNDP’s Global Anti-Corruption and Health teams will be actively engaged in project implementation at the global and country levels.

**Medium Priority**

* **Recommendation 5:** **Expand UNDP support of integrity in public services to include new areas of work**

ACPIS has done impactful work in the field of supporting integrity in procurement processes and construction project management. That work should be expanded to other aspects of public services delivery with a focus on those areas where there is the potential for an intersection of social accountability and sectoral engagement, such as health services and education. **MEDIUM TERM**

**Response:**

UNDP’s next phase of global anti-corruption programming for 2022-2025 envisions expanding UNDP’s support for integrity building in public services by focusing on six service lines:

1. Anti-corruption for effective service delivery (including health, education, water, etc.)
2. Integrity for climate, biodiversity and environment
3. Anti-corruption for conflict prevention and peacebuilding
4. Transparency and integrity in cities and local authorities
5. Anti-corruption for economic governance and development financing
6. Empowering agents of change for anti-corruption (focusing on gender equality and women’s empowerment, youth empowerment and private sector engagement)

This approach builds on UNDP’s experience, knowledge and ongoing programming support to effectively and comprehensively integrate anti-corruption across all key areas of development to accelerate progress on the SDGs through transparent and accountable service delivery, management of public funds and resources, and the prevention of illicit financial flows, amongst other areas.

* **Recommendation 6: UNDP should expand outreach to corporations that have a proven commitment to business integrity and have already put in place corporate training and engagement departments in line with global anti-corruption priorities.**

UNDP should leverage the relationship it has developed with the B20 to access a network of private sector firms that will allow for even greater reach for UNDPs anti-corruption efforts. By expanding its partnerships with the private sector UNDP can benefit from their added value of core knowledge of how business can be a positive force for the fight against corruption. **MEDIUM TERM**

**Response:**

The ACPIS Global Project has strengthened its engagement with the private sector to promote business integrity for the achievement of the SDGs. In response to the COVID-19 pandemic, UNDP and the B20 issued a Joint Statement ‘[Accountability and Anti-Corruption in the Age of a Global Pandemic](https://www.undp.org/press-releases/covid-19-b20-undp-joint-statement)’, calling for collective action by public and private sectors to improve response and recovery efforts by focusing on accountability, integrity and higher standards of ethical conduct.

In addition, one of the key service lines for the next phase of anti-corruption programming is **Empowering Agents of Change for Anti-Corruption (Service Line 6)**, which focuses on:

* Partnering the private sector to promote integrity in businesses and supply chains
* Promoting diversity and inclusion in businesses, and strengthening women's leadership for anti-corruption and business integrity
* Strengthening the Global Knowledge Platform on integrity and anti-corruption to empower stakeholders through training, leadership development, knowledge exchange and sharing

In the frames of the next phase of global anti-corruption policy and programme support work, a Joint Platform on Business Integrity will be established together with corporations that promote business integrity, Corporate Social Responsibility (CSR) and Environmental, Social, and Corporate Governance (ESG) practices in line with the aspirations of the 2030 Agenda for Sustainable Development. The aim of the Joint Platform is to offer developing countries with policy and technical support on business integrity, CSR and ESG practices, and to facilitate the exchange of knowledge and good practices with businesses and small and medium-sized enterprises (SMEs) in developing countries.

It is expected that through mentoring and sharing of knowledge and experience, the Joint Platform will help enrich the knowledge of businesses and SMEs in developing countries, and empower them to learn and act together to help accelerate the achievement of the SDGs by 2030.

* **Recommendation 7: Position UNDP as the focal point for integrating anti-corruption in the UN development agenda.**

The UN has made significant efforts in the past few years to create a coherent approach to anti-corruption and its role in the broader development agenda. UNDP, with its AC architecture (led by the ACPIS team), should continue to engage in the Task Force and UNGASS in order to provide the timely, high quality technical advice that is critical to a coherent policy on UN AC engagement. But beyond such support, as the coherent policy is implemented, UNDP should be positioning itself to be the UN system’s “go to” agency with regard to managing and supporting implementation by all agencies and the Secretariat. **IMMEDIATE**

**Response:**

UNDP’s new Strategic Plan (2022-2025) aims to support countries to expand people’s choices for a fairer, sustainable future, and to build the world envisioned by Agenda 2030 with planet and people in balance. The objective of UNDP’s Strategic Plan (2022-2025) is to accelerate and scale up development results so significantly that we bring the Goals back within reach. These are huge, whole-of-society puzzles that require collective efforts and integrated approaches. UNDP offers a unique network of global reach and local presence, sectoral expertise and trusted partnerships to help solve these puzzles.

In this context, the next phase of UNDP’s anti-corruption global policy and programmatic support work will build on the integrated approach of the previous anti-corruption initiatives and will position UNDP as the focal point for integrating anti-corruption in the UN’s development agenda in line with aspirations set in the new UNDP Strategic Plan.

In addition, the [UNGASS Political Declaration](https://undocs.org/A/S-32/2/ADD.1) underscores that the anti-corruption work of the United Nations should be strongly linked to and coordinated with measures and programmes contributing to strengthening the rule of law at the national and international levels. The Declaration also calls on UNODC to continue coordination and cooperation with UNDP to foster anti-corruption measures that enable the implementation of the 2030 Agenda.

The implementation of UNDP’s new Strategic Plan (2022-2025), UNGASS Political Declaration, UNDP’s role as co-chair of the UN’s Global Task Force on Corruption, and UNDP’s global anti-corruption programming for 2022-2025 will ensure UNDP’s lead role in integrating anti-corruption in the UN development agenda.

**Low Priority**

* **Recommendation 8**: **Explore how digitalisation has positively impacted the role of women in the fight against corruption.**

Anecdotal evidence is pointing to the fact that the Pandemic has enabled women to use digital technology to have the flexibility to access the knowledge and skills to be more active participants in the fight against corruption, including the ability to take a lead role in social accountability. This will require further research to define the specific parameters and impact of digitalization, but such work may have significant consequences for civil society, especially women. **MEDIUM TERM**

**Response:**

The global anti-corruption policy and programme support work for 2022-2025 includes a dedicated service line focused on empowering agents of change for anti-corruption, including women (Service Line 6). Corruption and its consequences have wide-ranging ramifications on society and undermine efforts to leave no one behind. Civil society, communities – women and youth in particular play a critical role to promote a culture of integrity and shape a more sustainable future for all. Moreover, to maximise the effectiveness of anti-corruption interventions in the long run, empowering champions, strengthening leadership & achieving anti-corruption goals through changes in behaviours and social norms are important.

Under this Service Line, the global anti-corruption work will engage women, youth and civil society in social accountability, monitoring, advocacy and innovative anti-corruption initiatives; promote women's participation and leadership for anti-corruption; and strengthen research and evidence on anti-corruption innovation, civil society, women and youth; among other activities.

* **Recommendation 9: Promote the adoption of national rules and systems to ensure Beneficial Ownership and transparency in corporate filings.**

Beneficial ownership is focused on the provision of laws and rules that ensure a transparent process for establishing corporation and those individuals who have ownership of these entitles as a means of limiting corruption. UNDP should take on this topic as one of the cutting-edge topics that will expand the integration of AC in development work while promoting partnerships with the private sector and governments interested in transparency. This can include the development of think pieces, an advocacy campaign and pilot projects to promote the required legal reforms in receptive jurisdictions. **MEDIUM TERM**

**Response:**

Public registers of beneficial owners can provide access to high-quality data about who owns, controls, and benefits from companies and their profits. This information – known as beneficial ownership transparency – helps tackle corruption, reduce investment risk, and improve national and global governance. Yet, beneficial ownership transparency is new to many countries that stand to benefit, and more support is needed to realise its impact.

UNDP’s Anti-Corruption Innovation Initiative includes a focus on open data innovation for transparent beneficial ownership (Cluster 3). While specific projects submitted by UNDP COs were not focused on promoting beneficial ownership transparency, many project proposals included significant elements promoting open data and transparency in public procurement, contracting, environmental governance, etc. Beneficial ownership transparency is a relatively new topic and UNDP’s Global Anti-Corruption Team will continue building on this work. In particular, the global anti-corruption policy and programmatic work for 2022-2025 envisions the development of think pieces, advocacy and public awareness campaigns and dedicated country-level projects related to this topic.

In 2021, the ACPIS Global Project established a partnership with Open Ownership (OO), a global expert in this area of work involved at every stage of the process to make reforms work and to deliver results for citizens. This partnership will continue beyond 2021, and it is planned to develop joint projects on beneficial ownership transparency to build business and market confidence, tackle corruption and criminal activities, improve government procurement and spending, and support sustainable and equitable development at the global, regional and country levels.