

**OECD Anti-Corruption Network for Eastern Europe and Central Asia
Work Programme 2016-2019**

External Evaluation Report



This external evaluation was conducted by Marijana Trivunovic, working as an independent consultant for the OECD. This document assesses the progress made in the implementation of the Work Programme 2016-2019 of the OECD Anti-Corruption Network for Eastern Europe and Central Asia.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

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Abbreviations and Acronyms

ACN	Anti-Corruption Network for Eastern Europe and Central Asia
CPI	(Transparency International) Corruption Perception Index
CSO	civil society organisation
DAC	(OECD) Development Assistance Committee
EBRD	European Bank for Reconstruction and Development
WGI	(World Bank) Worldwide Governance Indicators
GRECO	(Council of Europe) Group of States against Corruption
IAP	Istanbul Action Plan
LEN	Law Enforcement Network
OECD	Organisation for Economic Co-operation and Development
OSCE	Organization for Security and Co-operation in Europe
UNODC	United Nations Office on Drugs and Crime
WB	World Bank

1. EXECUTIVE SUMMARY

The **Anti-Corruption Network (ACN)** is a regional outreach programme of the **OECD Working Group on Bribery**, open to all countries in Eastern Europe and Central Asia. It was established in 1998 as a regional forum to support member countries in their efforts to prevent and fight corruption through the exchange of information and good practices.

The present evaluation report assesses the progress made in the implementation of the ACN Work Programme 2016-2019. It considers the activities implemented during this period under four principal programme components: the Istanbul Action Plan; thematic studies and seminars on prevention and business integrity; and the Law-Enforcement Network. It also takes into account ACN's governance structure, operating practices, and cooperation with partners such as international, civil society, business and donor organisations. Specific in-country technical assistance projects are beyond the scope of the assignment, and they may well merit independent evaluation. Some aspects of the projects will nevertheless be considered in connection with the main Work Programme. Overall, the evaluation focused on the results of implemented activities and the challenges encountered, so that the lessons can inform future planning and implementation of network activities.

The evaluation was conducted based primarily on documentary evidence (including extensive internal monitoring and reporting data) limited number of interviews with key stakeholders (list of persons consulted is provided in Annex 2). The data obtained was taken at face value, however conclusions were drawn upon triangulating corroborated, if anecdotal, evidence collected from multiple sources.

The **report is structured in five main sections** starting with the Executive Summary and the Introduction. The findings are to be found in section three, segmented along the five DAC evaluation criteria (relevance, effectiveness, impact, efficiency, and sustainability). Section four contains main conclusions and recommendations based on lessons learned from implementation and reflecting the current debates and an evolving knowledge base in the anti-corruption field more broadly. Additional data is provided in annexes in section five.

Main Findings

This evaluation has found numerous indications that the ACN is making meaningful contributions to the anti-corruption efforts and knowledge both in member countries and in the discipline overall. It **confirms the previously established (in the 2015 evaluation) overall relevance, high quality, and efficiency of ACN activities and outputs.** The present analysis therefore aims to explore beyond this general positive appraisal to discern more subtle challenges for further refinement of ACN efforts.

The **relevance** of various ACN activities is confirmed across several dimensions, even if it varies across the membership base, as not all members take part in all the programme components. The Istanbul Action Plan (IAP) is the main component where only a select number of countries takes part, and for these countries, the relevance is confirmed by intense engagement with the process, among other indicators. Similar levels of engagement and ownership have been documented in connection with the Law Enforcement Network (LEN), including members requests for further in-country seminars. For both of these, the ACN peer-based methodology is seen as the most important factor in rendering the interventions relevant for the members. For other components, much relevance is drawn from the fact that thematic decisions are based on member suggestions rather than external strategies, and thus are fully responsive to member needs. Among these, the work on business integrity is additionally relevant as a less-frequently seen area of intervention, and one where the OECD and its partner (the EBRD) possess a comparative advantage vis-à-vis other international organisations.

There is an important change planned for the next Work Programme that is bound to shift the relevance of ACN's monitoring work. Namely, the IAP monitoring methodology will incorporate comparable scores, based on common objective criteria, on several performance indicators. At the same time, it will also expand reporting on many (but not all) of the performance indicators for the remaining ACN countries. The implementation and results of these changes over the in the next period merit close monitoring for lessons relevant for the broader anti-corruption practitioners community.

In terms of **effectiveness**, the numerous anecdotes and testimonials indicate the ACN's contribution to the fight against corruption. Most of these results concern the IAP monitoring process where the level of interaction is considerable and sustained, although evidence about other project components also exists. Much positive feedback exists in connection with the law enforcement network (LEN) and the case-study based seminars, in particular. One analysis of post-seminar survey results demonstrated a striking improvement in knowledge, but such evidence is not systematically available.

A part of the challenge in presenting ACN achievements stem from the shortcomings in the results framework and limited data collection, rather than the quality of the interventions. The results framework which does not always reflect all the positive outcomes being achieved (e.g. above-mentioned knowledge improvement outcomes, or exemplary NGO participation in the IAP monitoring process) or the most appropriate indicators; corresponding or data collection and analysis is likewise absent. This evaluation highlights the identified limitations and advises to address them, so that in the future the achieved results are systematically documented. It also proposes that the review of the monitoring framework boldly challenge the conventional approaches in conceptualising results in anti-corruption programming. The ACN has already moved beyond the common errors in assessing longer-term results in some key respects (like attempting to measure the **impact** of individual programmes through aggregate indicators such as the Transparency International Corruption Perceptions Index). It has also attempted to measure its results through member countries performance on several key indicators (also tied to the IAP monitoring and regional outlook noted above). With numerous data collection challenges, however, the work is not yet completed and a link back to the ACN results framework still needs to be made. The eventual solution could be instructive for the anti-corruption practitioners community more broadly.

The ACN continues to demonstrate **efficiency** through its parsimonious management of resources, identification and use of cost-free resources, and "recycling" or "re-purposing" outputs in multiple ways. It also continues to cooperate with other organisations to avoid duplication, maximise (and secure additional) funding and achieve synergies. Programme savings are also realised through member countries frequent in-kind contributions both when hosting ACN events and through covering the costs of their representatives' participation in ACN events. Member countries have also begun making voluntary financial contributions during the period under consideration (2016-2019).

Member contributions will not make the ACN financially self-sustainable, and it is highly questionable whether such an ambition would be appropriate in view of the membership base. Nevertheless, the ACN continues to attract donors, including a number of relatively small donors, as well as securing EU support for the first time in 2019. This diversity and ability to solicit interest of new partners—presumably due to the relevance and quality of both existing and new activities—bode well for the **sustainability** of the ACN.

In non-financial terms, many of ACN results are highly sustainable. Legislative or procedural changes in member countries effected through the IAP process, for instance, are seldom formally reversed (and if they are, they reappear on the international reform agenda). Various knowledge products contribute both toward advancing individual practitioners' capacities and the knowledge

development in the anti-corruption field more broadly. Many of the National Coordinators who participate in the Steering Committee have remained consistent for a number of years, and discussions with some of them (for the purposes of this evaluation) reflect an impressive level of expertise that has developed over time through initiatives like the ACN. The least documented area of results and their sustainability appears to be with the seminars apart from the LEN; with LEN, the advanced level of interaction indicates the engagement of professionals who typically remain in their fields, advance in the hierarchy, and often act as trainers or mentors to junior colleagues.

An overview of the ACN's particular strengths stand as follows:

- **Expertise is consistently identified as the most notable asset** of the ACN's team, including the experts engaged in various activities, and is reflected in the outputs such as monitoring reports and thematic seminars.
- The **high quality of Istanbul Action Plan monitoring reports is also due to the overall approach (methodology)**: each review considers all topics comprehensively; analysis is quite in-depth; peer-based assessments by regional experts bring a profound understanding of the context and the challenges reformers face; and, the extent of civil society inclusion is exemplary.
- The **methodology of the seminars**—the practical, case-study-based format of LEN seminars in particular—has likewise been highlighted by a number of respondents as more effective than other approaches they have encountered. Limited but arguably indicative evidence confirms that the seminars improve the participants' knowledge levels.
- ACN's engagement and **cooperation with partners** also stand out. Other international organisations seek to implement their own outreach mandates together with the ACN (for instance, the EBRD work on business integrity, and RAI aspiration to further integrate their efforts). ACN's convening capacity appears to result from its long-standing presence and track record in the region, and the institutional status of the OECD.
- The Secretariat's notable aptitude in **operating efficiently and maximising limited resources**, including through cooperation with other partners, remains at a commendable level.

Additional observations based on new evidence include the following:

- **ACN members' continued commitment to the voluntary network** is further demonstrated through in-kind contributions and outright voluntary membership fees. The latter is a recent development instituted within the 2016-2019 Work Programme.
- The **ACN Secretariat continues to strive to improve operations**. It has implemented the most important recommendations from the previous evaluation, one of them being a fundraising strategy that includes the above-mentioned voluntary membership fees.
- Also commendable is the Secretariat's **significant effort to measure its performance** by tracking outcome-level indicators on specific anti-corruption thematic areas. This is a no simple feat, and highlights both the challenges in measuring country performance in the fight against corruption, as well as the limitations of conventional approaches to measuring programming results.
- These **performance measurement efforts hold a value the entire anti-corruption practitioners community**, for instance by advancing knowledge on the obstacles in obtaining comparative

country data (e.g. the incongruity of data collection practices among countries; or, identifying meaningful performance benchmarks for “reactive” functions such as law enforcement).

- While the ACN’s contribution to anti-corruption efforts and knowledge is not in doubt, many of the conclusion are drawn on the basis of anecdotes and inference due to a lack of indicators and limited evidence. This evaluation has identified several weaknesses in the results framework, in particular instances where the **relationship between inputs and expected results should be reassessed**.

Recommendations:

The ACN **work on modifying IAP monitoring methodology in order to obtain a comparable scoring system should be continued**. It would be advisable to articulate explicitly (if only internally) what will be lost and what gained in comparison with the previous methodology. The Secretariat should thereafter **monitor the application of the revised methodology to confirm the additional benefits and potential unintended drawbacks**.

The ACN should likewise **continue its efforts to broaden its monitoring efforts to produce a Regional Outlook**. It should articulate how this “league table” is to be used (by the countries themselves, by the anti-corruption community) and how it will contribute to the fight against corruption. Here too, the Secretariat should **monitor the process for unanticipated benefits and potential obstacles**.

The Secretariat should **review the results framework for all Work Programme components**. Additional detail would be helpful: for instance, articulating distinct immediate, intermediate, and longer-term outcomes (and their indicators), and the assumed relationship between interventions and anticipated results, particularly for the thematic studies and seminars. The changes in the monitoring methodology could change the dynamics of relationships between the Secretariat and its members and affect the anticipated results.

Suggested is a **structured review process** consisting of the following elements:

- Research into existing practices of similar initiatives for lessons and ideas;
- Consultations with beneficiaries to gain additional feedback about programme benefits and expectations; and,
- Elaboration of the ACN results framework in detail, and scrutiny of its logic and assumptions; (in particular the implications of methodological changes and other issues raised in this evaluation);
- Consultations with donors and other stakeholders about the soundness of the approach;
- Elaboration of the necessary data collection protocols to support the amended framework.

Such a process should ideally provide the ACN with an improved results framework that reflects ACN’s specificities (voluntary regional network), strengths (expertise, high-quality outputs, convening capacity, etc.), and limitations (funding, institutional constraints, etc.) to better document the results of the new Work Programme. Insights gained through this process could also assist other organisations and initiatives facing similar challenges.

2. INTRODUCTION

The Anti-Corruption Network (ACN) is a regional outreach programme of the OECD Working Group on Bribery, open to all countries in Eastern Europe and Central Asia. It was established in 1998 as a regional forum to support member countries in their efforts to prevent and fight corruption through the exchange of information and good practices.

Evaluation Objective

The present evaluation report assesses the progress made in the implementation of the current ACN Work Programme (2016-2019). It considers the execution of activities and their results, as well as challenges encountered, in order to inform future planning and implementation of network activities, and to assist in reporting and ensuring accountability for the work undertaken.

Scope of evaluation

The evaluation considers activities implemented during 2016-2019, as well as ACN's governance structure and operating practices. It covers the principal components of the ACN Work Programme (the Istanbul Action Plan; thematic studies and seminars on prevention and business integrity; the Law-Enforcement Network) as they are implemented in various ACN countries, and in cooperation with ACN partners such as international, civil society, business and donor organisations. Specific in-country technical assistance projects are beyond the scope of the assignment, and they may well merit independent evaluation. Some aspects of the projects will nevertheless be considered in connection with the main Work Programme.

This report contains the main findings on the evaluation criteria set out by the terms of reference (provided as Annex 1). It provides recommendations based on lessons learned from the specific ACN activities implemented during the current Work Programme, and reflecting the current debates and an evolving knowledge base in the anti-corruption field more broadly.

Evaluation framework

The terms of reference for the present evaluation stipulate that the Work Programme should be assessed based on the OECD/DAC assessment criteria: relevance, effectiveness, efficiency, impact and sustainability. Particular evaluation questions provided under each category are noted at the beginning of each section.

Effectiveness, in particular, is assessed with respect to the outcomes defined in the programme logframe, provided in Annex 3. The relevant portions of the logframe will likewise be referenced in each relevant section.

As the present evaluator was also the author of the previous (April 2015) evaluation report for the 2013-2016 Work Programme¹, the current assessment will draw on the previous findings and recommendations in order to consider the progress in a slightly longer-term perspective.

Results framework

To begin, a few general observations on the results framework are in order.

¹ External Evaluation: ACN Work Programme 2013-2015. April 2015. Available at <https://www.oecd.org/corruption/acn/ACN-External-Evaluation-Report-2015-ENG.pdf>

Results frameworks are project management tools that aims to make interventions more effective. They promote better programme/project design by compelling users to make explicit, and thereby scrutinise, the reasoning informing programmatic decisions. They call for specifying, for instance, the link between the inputs and the projected outcomes, and the extent to which the proposed inputs are appropriate for achieving them. This set of considerations will be addressed under Relevance, in section 3.1 below.

They also assist in programme monitoring and assessment, by articulating precisely what a programme aims to achieve. Outcome level results are key because they can be reasonably linked with the project inputs. Outcomes can be more or less immediate, and the further removed the outcome, the more difficulty to establish a causal relationship. This is precisely the difficulty with assessing impact, as will be discussed further in section 3.3. below.

Ascertaining and documenting outcomes can nevertheless also pose a challenge, hence the need to specify indicators. The logframe does not specify indicators explicitly, but some are implied in the presentation of outcomes as well as in the annual reporting. This evaluation will consider not only the presented and implied metrics and evidence, but it will also suggest possible other approaches to capturing results in the future. These will be discussed in connection with the relevant programme components' Effectiveness in section 3.2. below.

Methodology

The evaluation was conducted based primarily on documentary evidence (various ACN reports and supporting materials) and a limited number of interviews with key stakeholders (list of persons consulted is provided in Annex 2). A survey of country representatives was decided against in view of sufficient input captured in ACN regular reporting. The analysis also considers, to a limited extent, the performance of comparable organisations, as well as the current state-of-the-art research and knowledge on anti-corruption issues in order to provide a broader context for reflection on future steps.

Limitations

The findings are primarily based on rather extensive internal monitoring data, and a select number of interviews from ACN stakeholders. The data obtained was taken at face value, however conclusions were drawn upon triangulating corroborated, if anecdotal, evidence collected from multiple sources.

Structure of report

The report is structured along the five DAC evaluation criteria, and along the main Work Programme components within each of those main sections. The final section contains main conclusions and recommendations, and five annexes follow.

3. FINDINGS

The following five sub-sections present evaluation findings on the five DAC evaluation criteria specified in the terms of reference. Within each sub-section, findings are further segmented according to the main programme components, as follows:

- Istanbul Action Plan;
- Prevention Work;
- Law Enforcement Network; and,
- Business Integrity seminars.

The evaluation considers the Steering Committee and the network overall as appropriate.

First and overall, the present assessment found a broad confirmation of views captured in the evaluation of the previous Work Programme, particularly in connection with the high quality of expertise and design of ACN activities. Members' appreciation for the network is firmly established.

The present analysis therefore aims to explore beyond this general positive appraisal of the ACN to discern more subtle issues and challenges that could be considered for further refinement of its efforts.

3.1. Relevance

Evaluation questions:

- To what extent did the design of the Work Programme and implemented activities address the important issues for and needs of the beneficiary countries?
- To what extent does the Programme provide a value added to other on-going anti-corruption activities in the region, builds on comparative advantages and coordinates with other programmes?

Corruption remains a challenge throughout the world, both in consolidated democracies and in countries that are still in the process of building robust governance system. The challenge differs only in character and scale, and these circumstances change over time. In this respect, ACN's **overall objective remains relevant**. Its **geographical focus likewise remains relevant** due to the shared experience of post-communist/socialist transition starting in the early 1990s, even if today the situation among the countries varies considerably.

The ACN is not the only network that brings together representatives of preventive anti-corruption bodies or law enforcement in the region, but the number of comparable initiatives may be declining, at least in the Western Balkan sub-region. It has been reported that at least one active initiative (RESPA, Regional School of Public Administration) will discontinue explicit anti-corruption programming. At the same time, another existing partner (RAI, Regional Anti-Corruption Initiative) has expressed an aspiration to cooperate with the ACN even more closely in the future. The ACN's institutional stature as a programme of the OECD and its longevity, together with the Secretariat's proactive outreach practices, position it as a dependable clearinghouse and convener of anti-corruption actors. Such a role may grow more valuable in the shifting institutional landscape in the region in the next several years.

Not all ACN activities are available to all its members: the Istanbul Action Plan monitoring process in particular is limited to a smaller group of countries² (the IAP is addressed in more detail below). Hence, **relevance varies across the membership base** due to the limited geographic coverage of particular programme elements. Relevance also varies across thematic focus areas: there is some diversity of challenges among the ACN members, and different countries are further advanced than others in establishing particular elements of their anti-corruption systems.

Overall, **particular topics** covered by thematic studies and seminars **reflect member needs and preferences** communicated to the Secretariat formally and informally, including at Steering Committee meetings and through questionnaires distributed during regional events. There is broad agreement in the professional community that much still remains to be learned about designing and implementing anti-corruption measures, which supports ACN's efforts to analyse and share lessons about practices implemented to date.

The **thematic work on prevention has grown more focused**. It has evolved from a broad compendium of preventive practices in the first study (the 2015 study *Prevention of Corruption in the Public Sector* produced under the previous Work Programme) to a three-sector study and related seminars in 2017 (*Corruption Prevention in the Education, Extractive and Police Sectors*), to single-themed work on

² Although the experts conducting the monitoring come from a far broader range of ACN member countries.

corruption prevention at local level (two regional seminars in 2017 and 2018 and the forthcoming study *Prevention of Corruption at Local Level: Good Practices and Policy Recommendations for Eastern Europe and Central Asia*).

The law enforcement publications concentrate on persisting and new challenges (e.g. independence of prosecutors, mutual legal assistance, confiscation of proceeds and instrumentalities of corruption crimes, investigations of beneficial ownership structures), and the meetings also often seek to advise on new tools or investigate approaches (e.g. block chain analysis). Law enforcement officials interviewed assess topics covered as both suitable and useful, thus **confirming the relevance of ACN's continuing efforts to strengthen law enforcement capacities**.

Last, but by no means least, the programme component addressing **business Integrity** (launched with the previous Work Programme and continuing at an increased pace in partnership with the EBRD) **emerges as especially relevant**, in particular because there are few other initiatives with pertinent substantive capacities.

The last observation about ACN's relatively unique contribution to combatting private sector corruption invites a **comparison with the relevance of its work on the public sector corruption prevention mechanisms and law enforcement**. While there is no doubt of a continuing need for tools and training on a range of anti-corruption topics generally speaking, the areas of prevention and law enforcement are often addressed by other organisations and technical assistance projects³. Because the needs throughout the region are considerable (excepting, perhaps, ACN's Baltic EU members), the concern is not with duplication, chiefly because the ACN is exceptionally proactive in coordinating with other organisations and co-organising activities. The concern is rather with the extent or "concentration" of inputs on any single thematic area (one or maximum two per annum), and the prospect of effecting the anticipated outcomes. It is of course more of a question of effectiveness that will be explored more fully in section 3.2 below, however it does bear considering in the context of relevance of the programme design and the strategic options.

Methodologically, all ACN programme components are rooted in peer-exchanges, and all stakeholders interviewed **confirm the relevance of the overall approach**. It is established good practice of various types of regional initiatives, including global and regional anti-corruption bodies (UNCAC Implementation Review Mechanism, GRECO in Europe, MESICIC in the Americas, the ADB/OECD Anticorruption Initiative for Asia and The Pacific, etc.), as well as, of course, technical assistance projects including twinning initiatives. It is also the rationale for countless professional associations in the private sector.

At the next level, the ACN employs four basic programming approaches: monitoring the adoption and implementation of international standards (Istanbul Action Plan); technical advice on options and good practices in designing and implementing these standards (Istanbul Action Plan and country-specific projects), collection and systematisation of good practices in various anti-corruption fields (thematic studies), and dissemination and training on good practices (thematic seminars and country-specific projects). Network members and observers have consistently expressed support for these approaches. Certain interlocutors have highlighted their appreciation for the "OECD methodology" in thematic studies based on member-state surveys. ACN's training approach—involving case studies and practical work—has been repeatedly characterised as excellent, due to both to the methodology and the consistently high level of expertise the ACN is able to secure.

³ Strengthening law enforcement capacities to investigate and prosecute corruption is part of numerous initiatives—ranging from global (e.g. UNODC) to sub-regional (e.g. European Union/Council of Europe Horizontal Facility for the Western Balkans and Turkey) The ACN Secretariat highlights however the unique contribution of the LEN in particular, as the only predictable, regular regional framework for anti-corruption prosecutors to discuss practice.

From the members' perspective, three indicators of relevance can be discerned in ACN's internal monitoring and reporting data for the network and its activities overall.

First, in 2017, the ACN began collecting **Steering Group members' scores on the usefulness of its various activities**. This evaluation interprets usefulness as a dimension of relevance. Because country representatives attending Steering Group meetings do not necessarily participate in various seminars personally and may not have communicated closely with the colleagues that did attend, the responses should not be viewed as definitive.

Table 1: 2018 responses to question on usefulness of ACN activities, on a scale of 1 (low) to 5 (high)

ACN activity	# country responses (out of 20)	% countries responded	Average score
ACN Steering Group meeting in July 2018 in Paris	9	45%	4,0
Monitoring under Istanbul Action Plan, including 4th round of monitoring of Kazakhstan, Ukraine and Tajikistan, and progress updates for Armenia, Azerbaijan, Georgia, Mongolia, Kyrgyzstan and Uzbekistan	11	55%	3,7
Thematic studies on prevention of corruption, including the seminar on declarations of assets and interests in June 2018 in Tbilisi, publication of the study on corruption prevention at sectoral level, and seminar on prevention of corruption at the local level in December 2018 in Tirana	10	50%	3,9
LEN meeting in November 2018 in Prague and thematic studies on confiscation	9	45%	3,9
work on business integrity, including the regional seminar in Kiev in January 2017, sub-regional in Belgrade in July 2017 and country seminars in Ukraine throughout the year	8	40%	4,0

Table 2: 2017 responses to question on usefulness of ACN activities, on a scale of 1 (low) to 5 (high)

ACN activity	# country responses (out of 25)	% countries responded	Average score
Steering Group Sept 2017	15	60%	4,0
Istanbul Action Plan KZ, TJ, UA	13	52%	3,8
Thematic studies on prevention, Tbilisi and Tirana	15	60%	3,8
LEN in Baku	13	52%	4,1
Business integrity, Kiev and Belgrade	14	56%	3,6

All ACN activities were rated as above average, which is interpreted as a confirmation of relevance.

Second, **rates of participation in activities** could be viewed as another indicator. Annex 4 contains a table of ACN member countries' participation in a non-exhaustive selection of thematic seminars.

Consistent attendance can be observed, including the presence of representatives of countries that do not typically take part in the Steering Committee (e.g. Belarus, Russia), as well as representatives of non-member states. These factors imply that the activities are relevant to network countries and beyond. While they have not been quantified, ACN members' substantive contributions to thematic studies, in seminars or IAP reviews, and on performance indicators (established and tracked since 2017, please see section 3.2 below) all equally signal their commitment and consequently the relevance of the network efforts.

Third, **countries' financial contributions** should also be considered. Since the launch of its' fundraising strategy, the ACN has asked its members to make voluntary contributions to network activities, with some results. Financial contributions should be viewed from the members' perspective, some of which—right or wrong—view the OECD as a club of rich countries that is not seek financial contributions from some of the poorest countries in Europe. From that perspective, the contributions that come in are that much more significant. By September 2019, six members had paid their suggested fees (Azerbaijan, Georgia, Kazakhstan, Lithuania, Mongolia and Uzbekistan), with another in the pipeline (Moldova). Combined with in-kind funding and financing of in-country activities taking, or self-funding participation in the Steering Group or other activities, these financial contributions denote commitment and consequently, relevance of the ACN to its members.

Istanbul Action Plan

Due to its standing as the “signature” ACN activity and because of the planned methodological changes, the Istanbul Action Plan (IAP) deserves particular consideration. It has represented the main division in relevance among the ACN countries, as not all members participate in the IAP. Potential concerns with possible duplication of other review mechanisms, in particular Council of Europe GRECO monitoring⁴, have been addressed already in the previous evaluation, where it has been determined that the efforts are complementary rather than overlapping (additional consideration of substantive matters below). It has been suggested, however, that the relevance of the IAP monitoring could be nevertheless further advanced with the inclusion of Belarus and Moldova in particular.

Numerous testimonials attest to the benefits that IAP countries have reaped through participation in the process. For a number of countries, the IAP assessments have been an essential (and for certain ones, nearly the only) source of guidance and advice on implementing international standards. As in the previous evaluation, interviewed country representatives confirmed the continued usefulness of receiving such regular and comprehensive guidance⁵ that the IAP reviews provide. Armenia's new anti-corruption strategy elaborated in 2019 clearly illustrates this value to countries, with ACN IAP recommendations clearly referenced as a basis for numerous policy decisions⁶. Also previously noted, Mongolia's request to join the initiative stands as a clear example of the initiative's value to the countries. The process itself has also been reported as useful by national activists in raising the profile of the reform needs—mainly because of the OECD “brand” supporting the recommendation—even if not always leading to results (see section 3.2 below).

The IAP reports have been identified a valuable resource for other organisations. In addition to assisting independent researchers (such as the present author, as already noted in the previous

⁴ All ACN countries are also subject to UNCAC monitoring, however, with lower frequency and less depth of assessment due to its global scope. Furthermore, UNCAC monitoring began only in 2010.

⁵ The IAP reports are comprehensive offering a review of all key elements of anti-corruption systems, and not only particular themes. The high technical quality and thoroughness of the ACN reports, which has often amounted to a technical paper pointing the ways forward and laying out various options for reform, have been repeatedly highlighted as invaluable by many of the consulted country representatives.

⁶ The author reviewed a draft of the national anti-corruption strategy; however, the final adopted version is not available in English at the time of finalization of this evaluation report.

evaluation), the reports have served as background data to other organisations working in, or interested in developing technical assistance projects in the region, including the European Commission and the Council of Europe.⁷

Another beneficial dimension of the IAP process is the inclusion of civil society in the monitoring, including support to their capacity development. In this respect, the IAP process is relevant for broadening the base for public participation in anti-corruption efforts, and in this respect in particular, it presents value added that exceeds other monitoring mechanisms.⁸ As noted in the previous evaluation, the content of the IAP monitoring reports matters to the countries, and the same intensity of debate during the review process—including members of civil society—was observed during this evaluation visit as well.

The ACN Secretariat has recognised that the intensive monitoring undertaken over the past decade and a half has served its purpose however, and that some changes are in order. To that end, the ACN is developing an alternative, broader (to include all ACN countries) but less intensive monitoring methodology that will seek to measure the countries' status against common, rather than individualised, performance indicators.

While the increased uniformity and thus transparency in the evaluation criteria are welcomed by many interlocutors, the proposed changes nevertheless imply a shift in the relevance of the monitoring process. On one hand, with an expansion of monitoring to all ACN countries, the change will provide a broader regional outlook. Introducing uniform scoring parameters that indicate a country's status compared to certain benchmarks—and comparison among peers—may prove useful for advocacy purposes and to spur action, the way that the CPI does. On the other hand, if the new approach necessitates limiting the depth of analysis, or the range of topics addressed, there is a risk that it may deprive some countries of the much-valued specific policy recommendations, and the *de facto* technical assistance that the monitoring reports provided. Intended or not, this was value added of the IAP reports. As with any significant methodological change, it would be advisable to articulate as explicitly as possible the programmatic logic of the proposed approach, in particular, the specific immediate objectives: what is the aim of the change? What does ACN hope to drop and what to gain? What are the specific objectives of the new approach: to provide policy advice/guidance, to influence reforms, and/or something other? Such clarity would facilitate future assessment and learning.

⁷ ACN Secretariat further reports additional uses of IAP reports, for instance by the IMF (details unspecified), or by the European Court of Human Rights, which referenced ACN recommendations among other relevant international documents in its 2015 judgment on Georgia in the Case of Gogitidze and Others v. Georgia. Available at: <http://hudoc.echr.coe.int/eng?i=001-154398>

⁸ Broadening CSO participation has not been identified as a (sub-)objective or an immediate outcome of IAP work, but it should have been. More on this in section 3.2. below.

3.2. Effectiveness

Evaluation questions:

- How effective were the activities in achieving the objectives of the Work Programme at the output and outcome level (as defined in the logframe)?
- Which activities were the most effective in achieving the objectives?

In its annual reporting, the ACN notes that all its activities have been conducted as planned. The numbers of implemented seminars have changed from those projected in the Work Programme due to shifts in funding: there have been fewer prevention seminars but an increase in business integrity events due to a partnership with the EBRD. Overall, the rate of implementation of the planned outputs is satisfactory.

An assessment of the results at the outcome level is more challenging. The ACN has specified expected outcomes in the programme logframe, and these will be considered in connection with specific programme components in sub-sections below.

3.2.1 Istanbul Action Plan

Logframe excerpt

OBJECTIVES and ACTIVITIES	OUTPUTS	OUTCOMES/RESULTS
4th monitoring round of Istanbul Action Plan (IAP) to improve legal and institutional frameworks of IAP countries and their capacity to enforce international anti-corruption standards in practice by assessing implementation of previous recommendations on anti-corruption policies, prevention and law-enforcement, and developing new ones;	<ul style="list-style-type: none"> • 9 monitoring reports • 9 IAP countries, • 27 progress updates; • 9 shadow NGOs reports; • 9 on-site visits, • 9 return missions, • 4 plenary meetings; • summary report 	<p>IAP countries implement:</p> <ul style="list-style-type: none"> • UN, OECD and COE standards and good practices, • implement effective anti-corruption reform and IAP recommendations, • adopt effective anti-corruption policies; • introduce legislation compliant with international standards • take strong enforcement actions • effective measures to prevent corruption in the public and private sector. <p>As a result, the legislative and institutional frameworks and capacity in the IAP countries are</p> <ul style="list-style-type: none"> • sufficient for effective prevention and combating corruption; • governments focus on implementation of anti-corruption reforms;

While the phrasing of the outcomes appears to suggest several distinct types of results, in reality, they are closely interrelated and follow from one another. Namely, the IAP monitoring recommendations are founded on “UN, OECD and COE standards and good practices” and are assumed to comprise the range of stated actions: “adopt[ion of] effective anti-corruption policies”; “introduc[tion] of legislation compliant with international standards”; implementation of “strong enforcement actions” and “effective measures to prevent corruption in the public and private sector”, all of which are assumed to be “sufficient for effective prevention and combating corruption”.⁹

⁹ The outcome “governments focus on implementation of anti-corruption reforms” will be disregarded due to the non-measurability of the notion “focus on”: there is no reliable metric for the implied pace of implementation—compared to what?

None on the specified outcomes can be assessed with precision, and in that respect, they are not useful as indicators. For one, they contain ambiguous terms such as “effective” and “strong”, which are open to interpretation. More problematically, it would be necessary to analyse the thematic substance of each recommendation to determine the extent to which each type of result was achieved. Such analysis will be provided in the next overview report (forthcoming in late 2019/2020), and hence outside the time frame of the present evaluation.

The IAP process however contains one element that clearly establishes a causal link between the inputs and immediate outcomes: recommendations. In this respect, **implemented recommendations are the most precise indicator of the programme component achieving its objectives**. ACN’s some statistical reporting on the numbers of implemented or partially implemented recommendations stands as follows:

Table 3: Trends in implementation of IAP recommendations:

year	% implemented	# implemented (fully, largely, partially)	# not implemented /no progress	total # of recommendations
2018	62%	not reported		
2017	76%	125	39	164
2016	69%	121	53	174

Source: ACN Annual reports for 2016, 2017, and 2018.

The overall rate of implementation has increased and then declined from 2017 to 2018, but conclusions should be drawn with caution. For one, each year only a selection of countries is reviewed, hence the aggregate numbers each year reflect different and not necessarily comparable groupings. Related, the aggregate figures conceal individual countries performance, where a minority of poor performers can offset the good performance of others.¹⁰ Ideally, the trends would also be analysed per country, and ideally also per thematic category (e.g. procurement vs. asset declarations vs. law enforcement). The ACN has indeed begun tracking country performance for a number of thematic areas, which will be discussed further below.

Second, even if the annual samples were comparable, there are at least two ways that the figures could be interpreted: one, the trend might signal a decline in the countries’ capacity or willingness to implement reforms; or two, it might indicate that the outstanding reforms are the truly difficult ones that take more time, effort, coalition building, financing, etc. to implement. With recommendations refined with each review cycle to focus ever more specifically on outstanding challenges, the second explanation it is certainly plausible—and perhaps more likely. These methodological concerns may be precisely the reason why the ACN ceased providing annual aggregate data on implemented recommendations. Whatever the situation, only one conclusion can be drawn based on above data: despite the fluctuations in the rate of implementation, there is nevertheless a general positive trend: recommendations **are** being implemented.

Many interlocutors have highlighted the OECD’s institutional status as an important factor in moving the reform process forward, which would not advance as steadily if driven by national officials only. Ultimately, the fight against corruption is a political endeavour, that cannot be achieved through monitoring and technical assistance alone. Post-2003 Georgia stands out as the case in point: its remarkable reduction in corruption was due to unambiguous political determination to tackle the problem. It is beyond monitoring efforts and technical assistance to effect major strides in fighting

¹⁰ This is precisely the drawback of the Corruption Perceptions Index and the Worldwide Governance Indicators. All aggregate measurements share this limitation.

corruption absent political commitment, and there is little evidence of international organisations' ability to influence the political will of even its member states, much less non-members, as it the case for IAP countries.

It has been remarked in the previous assessment that the OECD could do more to raise the profile of the ACN in order to wield its influence through this outreach programme. The ACN Secretariat reports promoting its work both internally (for instance, in the OECD-wide events such as Global Anti-Corruption and Integrity Forum) and its institutional affiliation externally (for instance, a high-ranking OECD official has for the first time participated in an ACN monitoring visit during the period under consideration). Such a two-pronged approach should be maintained and strengthened where possible to further extend OECD's positive influence on member governments' political will to tackle corruption.

Beyond the explicitly articulated objectives and outcomes, it should be noted that the IAP process is widely recognised as a monitoring mechanism that excels in fostering civil society participation. While the ACN reports on CSO inputs into the review process (summarised in Table 4 below), no link is made to with ACN support to this outcome. (A potentially useful indicator could be constructed around **NGO participation in the monitoring process** in the future.

Table 4: NGO inputs into Istanbul Action Plan process

Monitoring reports	Progress updates	Number of NGO inputs
2018		
Armenia		12
Kyrgyzstan		
Ukraine (chapter on SOEs)		2
	Tajikistan	2
	Georgia	3
	Kazakhstan	1
2017		
Kazakhstan		3
Tajikistan		2
Ukraine		4
	Armenia	4
	Azerbaijan	
	Georgia	
	Mongolia	
	Kyrgyzstan	1
	Uzbekistan	
2016		
Azerbaijan		
Georgia		
	Armenia	3
	Kazakhstan	1
	Kyrgyzstan	2
	Mongolia	
	Tajikistan	2
	Ukraine	1
	Uzbekistan	

3.2.2 Corruption prevention

Logframe excerpt

OBJECTIVES and ACTIVITIES	OUTPUTS	OUTCOMES/RESULTS
<p>Corruption prevention seminars to improve capacity of ACN countries to prevent corruption by promoting recommendations and good practices on prevention of corruption as presented in the relevant thematic study, and to identify new good practices;</p>	<p>7 seminars for prevention practitioners 25 ACN countries, about 450 experts trained; updated study on prevention;</p>	<p>ACN countries take strong actions to</p> <ul style="list-style-type: none"> • prevent corruption • implement recommendations and • use some of the tools presented in the study, e.g. research, risk assessment, sector specific plans, ethics training, electronic services, access to information, develop and share new practices. <ul style="list-style-type: none"> • develop good capacity to prevent corruption • take effective and innovative measures to prevent corruption in the public administration, and • share their good practice across the region;

Similarly to the logframe component for the Istanbul Action Plan process, outcomes articulated for corruption prevention contain both short-term and longer-term results that follow from, or reiterate one another. Presumably, “us[ing] some of the tools presented in the study” amounts to “implement[ing] recommendations [from the studies]” and consequently also to “tak[ing] effective and innovative measures to prevent corruption in the public administration”. Such steps would arguably amount to “develop[ing] good capacity to prevent corruption” resulting in “prevent[ing] corruption”. The relevant indicator would be the adoption of measures advocated in the prevention studies; however, this data is not tracked.

The ACN has begun collecting and publishing in its annual reports data on the status of various preventive measures in categories of “anti-corruption policy and institutions” and “integrity in the public administration”. However, as it is not possible to causally link ACN outputs (thematic studies and seminars) to preventive policies or measures adopted in member countries except in select cases, the reported outcomes cannot be readily attributed to this programme component.¹¹

Interviewees have indicated that the corruption prevention studies are above all valuable reference materials that, along with the seminars, provide inspiration rather than drive reform measures. This value of the provided information is corroborated by the attendance rates noted in Annex 4 as well as the ratings of applicable activities presented in Tables 1 and 2 in the relevance section 3.1. above. It should also be remembered that all quality research and systematisation of practices furthermore contributes to an evolving body of knowledge on how to counter corruption more effectively.

Event agendas, participant lists, as well as the roster of national experts participating in monitoring all provide evidence that the final expected outcome “shar[ing]... good practice across the region” is ensured in every ACN activity. Further informal exchanges were also reported and observed outside of the scheduled sessions.

¹¹ The previous evaluation had already remarked that implementing measures requires far more sustained support than the guidance available from the thematic studies or seminars, and the observation continues to apply.

3.2.3 Law Enforcement Network (LEN)

Logframe excerpt

OBJECTIVES and ACTIVITIES	OUTPUTS	OUTCOMES/RESULTS
<p>Law-enforcement network to improve capacity of ACN countries to detect, investigate and prosecute corruption by promoting good practices and recommendations presented in studies on responsibility of legal persons, foreign bribery and MLA and developing new studies;</p>	<ul style="list-style-type: none"> • 7 meetings of the law-enforcement network • 25 ACN countries; • about 450 experts trained; • 2 new studies on criminalization; 	<p>ACN countries take strong actions to combat corruption, and implement recommendations to</p> <ul style="list-style-type: none"> • establish and enforce corporate liability for corruption, • establish foreign bribery offence, and • strengthen MLA systems. <p>They develop good law-enforcement capacity;</p> <p>Law-enforcement practitioners from ACN countries</p> <ul style="list-style-type: none"> • apply the knowledge and contacts they acquired during seminars in their work; • new complex offences are well understood by the ACN law-enforcement practitioners;

There is some question as to whether the results relating to legislative changes (“establish... corporate liability for corruption”, “establish foreign bribery offence”) and system development {“strengthen MLA systems”) are appropriate outcomes for activities involving law enforcement practitioners who may have only limited influence at the policy level. LEN participants may have more or less influence in these processes from country to country. While this evaluation accepts the ACN Secretariat contention that such advocacy efforts back home is further supported by the related Thematic Studies and recommendations from IAP monitoring reports, it continues to question whether the expectations are realistic.

It is further difficult to assess whether “Law-enforcement practitioners from ACN countries apply the knowledge and contacts they acquired during seminars in their work”. While the ACN now collects and presents some data on the numbers of corruption cases that entail some of the instruments covered by the seminars,¹² a causal link between the trainings and the results cannot be clearly established. Anecdotal testimony, however, does exist.

Evidence is available to confirm that LEN seminars contribute to “develop[ing] good law-enforcement capacity” in terms of knowledge. For instance, results from a knowledge-check exercise carried out in connection with a training provided through the Ukraine country project documents a meaningful change in seminar participants’ responses before and after the event (please see Annex 5). Considering that ACN seminars have been repeatedly praised by participants for their practically-oriented case study-centred methodology, there is sufficient basis to assume that knowledge development outcomes are being achieved.

The ACN Secretariat also highlights one recent example where the training methodology developed for the Ukraine country project (involving a simulated investigation of a complex corruption case) was applied at a LEN seminar. Following that seminar, three countries (Kyrgyzstan, Latvia and Uzbekistan) requested additional follow-up in-country training. Such instances attest that LEN is indeed contributing to the outcome of “new complex offences are well understood by the [participating] ACN law-enforcement practitioners” and that they, in turn, are communicating the received information to their colleagues at home—even in EU member states.

¹² ACN Annual Reports have included collected data on numbers of corruption cases involving, for instance, legal persons; confiscation; and mutual legal assistance.

The ACN further reports that network members provide invaluable input into the production of knowledge products, for instance the forthcoming Thematic Study on the independence of prosecutors. Also reported is that LEN as a group is considering moving toward a higher level of formalisation, for instance by promoting the participation of the same country representatives. A more consistent core membership that would contribute to advanced dialogue and greater specialisation. Correspondingly, it is planned that in the next Work Programme LEN seminars focus on high level corruption. In addition to reflecting a high degree of ownership of the network by its members, such potential changes suggest a potential shift in measurable results going forward, and a need to revisit the results framework. A review of the results framework should also consider the role of seemingly peripheral aspects of LEN, for instance interaction with the Global Law Enforcement Network and other activities of the Working Group on Bribery.

3.2.4 Business integrity

Logframe excerpt

OBJECTIVES and ACTIVITIES	OUTPUTS	OUTCOMES/RESULTS
<p>Business integrity seminars to improve capacity of ACN countries to prevent corruption in the business sector by promoting good practices identified in the relevant study and reviewing implementation of policy recommendations.</p>	<ul style="list-style-type: none"> • 7 meetings of business integrity practitioners • for 25 ACN and several OECD countries, • about 450 experts trained; • review on business integrity 	<p>The governments and the private sector in the ACN countries</p> <ul style="list-style-type: none"> • take effective measures to prevent corruption involving companies; • implement recommendations and apply good practices to promote business integrity; • new good practices are identified and disseminated across the region.

Evidence about the outcomes of the business integrity thematic studies and seminars is scarce. Similarly to corruption prevention discussed above, the admittedly unreliable data on business integrity does not establish a link with ACN outputs. Nevertheless, it is reasonable to consider the corruption prevention in the public sector results as a proxy, and predict similar outcomes, particularly as the outputs were designed based on similar, practical and case-study oriented methodologies.

On the other hand, business integrity is a relatively new and less-commonly addressed topic in the region, hence the awareness raising dimension is more significant. On the whole, while business integrity studies and seminars alone may not result in the implementation of “recommendations... and good practices to promote business integrity” (and equally “effective measures to prevent corruption involving companies”), they may well constitute the first step toward those longer-term outcomes. This component, perhaps even more so than others, could benefit from additional reflection about appropriate anticipated outcomes and how to measure them.

3.2.5 ACN overall

While not specifically stipulated in the TOR, it would be an oversight to consider distinct segments of the Work Programme without reflecting on the ACN as a whole. Arguably, it is the totality of the activities, rather than any one segment alone, that would produce outcomes that the ACN has attempted to capture by tracking country performance on a number of anti-corruption indicators, which are presented in the 2017 and 2018 Annual reports. The ACN is to be commended for its efforts, however there are important limitations in applying this data as a reflection of ACN results.

The most important of these is that ACN attribution cannot be readily established. As noted in the separate thematic sections, various ACN activities influence member countries' policies and practices to varying degrees. The degree of engagement and corresponding influence is significantly different between countries subject to IAP monitoring and others.

There is evidence to support the assumption that IAP monitoring contributes to the adoption of key preventive and repressive mechanisms. The above-noted 2019 National Anti-Corruption Strategy in Armenia is a case in point, but there are other documented instances of country reformers seeking to satisfy international standards promoted by the ACN and other international organisations (the Council of Europe in particular, and to a lesser extent the UN). ACN's comparative advantage in the IAP stems from the regularity and comprehensiveness of its assessments and updates.

It has been suggested that ACN seminars on prevention, law enforcement, and business integrity may represent an alternate source of inputs that reinforce policy recommendations of IAP monitoring reports. The logic is that the extent of engagement is also an important (if not key) factor for influencing policies. If this is true, then it stands to reason that sustained technical assistance projects exert the most influence on policies and practices, and thus possibly eclipse the effect of monitoring recommendations alone. For instance, it is quite plausible that a country's adoption of an anti-corruption strategy is far more attributable to a technical assistance project that supported workshops and expert inputs into the process than the recommendations in the IAP monitoring report alone.

In sum, the country performance data does not necessarily reflect ACN influence, particularly for non-IAP countries. Even in IAP countries, the results do not necessarily reflect "unique ACN influence", since other actors in the field may have also contributed to the outcomes. It may be possible—although probably highly impractical—to attempt to "filter" the results by degree of ACN influence, for instance by segmenting groups of countries that are not members of GRECO, or thematic areas that are covered uniquely by the ACN versus those supported by technical projects. Overall, however, because of the potential multiplicity of actors involved, the overall results are a poor measurement for the effectiveness of the ACN itself.¹³

ACN is a regional programme that cannot achieve the same level of results as more focused country projects, and this evaluation therefore questions the appropriateness of assessing its results according to similar benchmarks. Anecdotal evidence over the years has shown ways in which the ACN has influenced the adoption of anti-corruption policies and practices by IAP member countries in particular. With the change and expansion of its monitoring approach, it seems appropriate to review the results framework to ensure that the ACN is not committing itself to objectives that it cannot possibly achieve, and ignoring less obvious outcomes¹⁴. A voluntary network, the ACN clearly that succeeds in convening national representatives from countries who are under no legal obligation to join. This suggest that it provides a value for its members, otherwise they would not participate, including through financial and in-kind contributions. Going forward, it is possible that somewhat (or even altogether) different metrics may be needed for evaluating regional programmes such as the ACN.

¹³ Beyond the attribution difficulties, there are additional challenges for compiling and interpreting the country data. One is the inconsistency of data collection practices among countries, which severely limits comparability. Another is the lack of clear performance benchmarks for many anti-corruption functions. Law enforcement is the clearest example: how many investigations/arrests/convictions constitute "good performance"? For asset declarations regimes, how many detected violations indicate that sufficient scrutiny is applied? The anti-corruption practitioners community still strives to arrive at meaningful solutions, and ACN's contribution will be a welcome and invaluable contribution to these efforts—but it will not necessarily constitute a measurement tool for ACN's own work.

¹⁴ For instance, it has been suggested by some interviewees that the process of collection of country performance data has spurred some members to learn about performance monitoring where they had no such previous knowledge.

3.3. Impact

Evaluation questions:

- To what extent were the objectives of the Work Programme achieved?
- What was the overall impact of the activities implemented under the Work Programme on the fight against corruption in Eastern Europe and Central Asia (as defined in the logframe)?

The 2016-2019 Work Programme logframe specifies two types of impact: one, in the longer-term, a decrease in corruption levels in the ACN countries, and two, improved public trust in the public sector. These indicators represent an advance from conventional approaches that typically (and mistakenly) use the Transparency International's Corruption Perceptions Index (CPI) and the World Bank Worldwide Governance Indicators (WGI) scores as indicators of results at impact level.

It is inappropriate to consider impact in terms of "overall levels of corruption" because "overall levels" are impossible to assess: corruption is a broad phenomenon occurring across multiple sectors that cannot be comprehensively influenced by any a single programme. Few anti-corruption experts still support using aggregate indicators such as the CPI or the WGI for monitoring and evaluation purposes. Transparency International itself, the author of the CPI, discourages such application.

Less has been published about the appropriateness of using measurements of public trust as a proxy for advances in the fight against corruption. Presumably, such view might reflect the perceived "political will", but further research and consideration would be needed. A more practical obstacle lies simply with obtaining data. As the ACN Annual Reports demonstrate, not all ACN countries appear to conduct such surveys, and/or they may not be conducted at regular intervals according to comparable methodologies. Furthermore, as countries are unlikely to use the same approaches, comparison among countries would not be possible. Using national quantitative data as an indicator impact would require a considerable level of methodological scrutiny and analysis.

ACN annual reporting on the specified impact results is incomplete, likely due to the above-described challenges in collecting and analysing national survey data. Annual reports continue to include CPI and WGI scores. The review of the results framework recommended elsewhere in this evaluation should also revisit assumptions about impact level results and how to document them.

What technical assistance and experience sharing through initiatives such as the ACN *have achieved* over the years can be glimpsed observing the proceedings of the ACN Steering Committee meetings, and speaking with country coordinators. An onlooker perceives many seemingly-small developments that suggest the impact which the totality of anti-corruption efforts have had over the years. For instance, the quality of discussion has shifted, with many national representatives offering inputs at the same level of expertise as might external consultants. There now exists a cadre of national anti-corruption specialists capable of providing technical assistance, which they have an opportunity to do in many of the ACN activities (e.g. IAP monitoring or trainings), even if they are limited in applying their expertise in their own countries.

The proposed modification of the IAP monitoring methodology itself may signal a tacit recognition that the technical guidance has been delivered to a satisfactory extent, and that attention is being shifted to creating an avenue of pressure to influence the elusive "political will". This may be an astute strategic shift that should be reflected in the results framework. The creative thinking behind the shift should be elaborated to the impact level to assess whether it leads to a more useful conceptualisation of anticipated results and indicators.

3.4. Efficiency

Evaluation questions:

- How efficient were the activities implemented under the Work Programme in achieving the objective, i.e. could the objectives be achieved with less or a better use of resources?
- Which activities were the most and the least effective in achieving the objectives?
- To which extent did the programme management ensure the efficiency of its implementation?

The previous evaluation highlighted the efficiency of ACN activities in terms of parsimonious management of resources, which relates to the above-defined third evaluation question on efficiency. The prior assessment holds also for the present Work Programme, as the ACN Secretariat continues to identify and make use of freely available resources, “recycle” and re-purpose its outputs in multiple ways, and cooperate with other organisations to avoid duplication, maximise resources and achieve synergies.

Some examples of this economical management and generation of resources stand as follows:

- The ACN adapts and promotes knowledge resources developed by other OECD units, for instance the 2018 methodology for education sector assessment;
- Seminars are organised back-to-back with other events of interest to participants so that they may benefit from attending both without the additional travel costs (e.g. 2019 monitoring and Steering Committee meetings were organised back-to-back and concurrently with the OECD Global Forum on Anti-Corruption and Integrity; the November 2018 LEN seminar took place back-to-back with the International Bar Association (IBA) Central and Eastern Europe and Central Asia Anti-Corruption Enforcement and Compliance Conference, etc.);
- A considerable number of inputs into thematic studies (e.g. Corruption Prevention in the Education, Extractive and Police Sectors) and monitoring reports are provided *pro bono*;
- All prevention and business integrity seminars are co-organised and co-funded or externally funded. The business integrity work in particular has been funded by the EBRD (after the first co-funded seminar) and thus extending beyond the initially planned scope; and,
- As noted elsewhere, some international organisations and member countries provide considerable in-kind support (seconding experts, hosting events, self-funding participation in events etc., reported at near EUR 95 000 in 2016; near EUR 130 000 in 2017; and over EUR 140 000 in 2018). Members voluntary annual membership fees to the ACN, instituted in 2017, have amounted to EUR 34 813 by the end of 2018.

The longevity of the ACN team, including experts, also contribute to the organisation’s efficiency. They have acquired an exceptional level of regional knowledge (particularly of the IAP countries) and maintain an institutional memory that prevents wasteful repetitions or false starts often observed with frequent staff turnover.

The present evaluation questions inquire about the efficiency of activities in achieving the specified objectives. There is no clear answer for three reasons. One, as the annual reports contain no financial breakdown of particular activities, it is not possible to be formulating a value-for-money calculation. Two, the data on outcomes is not systematically disaggregated according to specific activities. There has been some anecdotal evidence about the IAP monitoring process providing key impetus for adopting and implementing certain laws (e.g. freedom of information law in Armenia), however, as there is no comparable data for the changes at the national level based on knowledge gained through seminars and thematic studies. And in many cases, it may well be the cumulative effect of the IAP process *and* the seminars that leads to particular outcomes. Three, and most importantly,

the value of the outcomes is not quantifiable even if they were systematically tracked. Is it “more valuable” to effect recommendations through the IAP process or to persuade private sector organisation to implement integrity measures? Firm conclusions about the comparative effectiveness of particular activities cannot be drawn.

The above discussion of effectiveness raised several questions about the prospect of prompting stipulated outcomes through various ACN activities. It also noted was the relatively limited success of technical interventions absent political will more generally, across organisations and programmes. Nevertheless, available evidence (and common sense) do suggest that larger, country-focused, and more sustained investments would yield more outcomes at the level of adopted laws or enhanced procedures. But, apart from select country projects, broad regional initiatives such as the ACN have a different remit, and the outcomes may need to be alternatively conceived.

3.5. Sustainability

Evaluation questions:

- To what extent can the impact of the Work Programme be maintained after its completion?
- How can the sustainability of the impact be supported in the future?

The documented outcomes achieved through the ACN Work Programme appear sustainable in the sense that legislative or procedural changes in member countries effected through the IAP process are seldom formally reversed. That said, in the anti-corruption sphere there have been examples of obstructions of fledgling or even established institutions through, for instance, reductions in budgeting or political interference. This is a risk common to all anti-corruption programming, not only the ACN. Even in such cases, ACN monitoring captures the reversals and returns them to the reform agenda: the analysis and the recommendations rooted in international standards remains in the public domain to be referenced and reinforced by subsequent initiatives.

Thematic studies and similar knowledge products promise similar extended value. They have been identified by a number of stakeholders as useful reference materials, and they contribute to the overall development of an evolving anti-corruption knowledge base.

The assessment is more uncertain with the remaining ACN activities. To the extent that business integrity efforts are framed in terms of the benefits to the companies themselves, they could emerge as more sustainable than public sector efforts, but in the short-term and lacking evidence, this is merely a hypothesis to be tested.

Seminars for practitioners are the most unpredictable element. On one hand, the technical capacity developed by individuals endures: as noted above, the level of expertise many of the longer-term country representatives have gained is impressive. On the other hand, if the institutional or broader national environment does not permit them to apply their expertise, those individuals may leave the public sector altogether and apply their skills elsewhere. Yet even if their knowledge is applied in other ways—for instance, through NGOs or even international organisations—they will still be working to advance the fight against corruption, and in this sense, the results will last.

The ACN continues to attract donors, including a number of relatively small donors. It has secured EU funding for the first time in 2019. Member in-kind and voluntary direct financial contributions are significant for reasons of relevance and ownership, but they will not make the ACN financially self-sustainable—and it is highly questionable whether such an ambition would be appropriate in view of the membership base. They do contribute to a diversity of funding sources, however. The ACN's fundraising strategy appears to be bearing fruit, which casts a positive outlook for its financial sustainability in the medium terms.

4. LESSONS AND RECOMMENDATIONS

This evaluation has found numerous indications that the ACN is making meaningful contributions to the anti-corruption efforts and knowledge both in member countries and in the discipline overall. It confirms the previously established (2015 evaluation) overall relevance, high quality, and efficiency of ACN activities and outputs. Particular strengths stand as follows:

- **Expertise is consistently identified as the most notable asset** of the ACN's team, including the experts engaged in various activities, and is reflected in the outputs such as monitoring reports and thematic seminars.
- The **high quality of Istanbul Action Plan monitoring reports is also due to the overall approach (methodology)**: each review considers all topics comprehensively; analysis in quite in-depth; peer-based assessments by regional experts bring a profound understanding of the context and the challenges reformers face; and, the extent of civil society inclusion is exemplary.
- The **methodology of the seminars**—the practical, case-study-based format of LEN seminars in particular—has likewise been highlighted by a number of respondents as more effective than other approaches they have encountered. Limited but arguably indicative evidence confirms that the seminars improve the participants' knowledge levels.
- ACN's engagement and **cooperation with partners** also stand out. Other international organisations seek to implement their own outreach mandates together with the ACN (for instance, the EBRD work on business integrity, and RAI aspiration to further integrate their efforts). ACN's convening capacity appears to result from its long-standing presence and track record in the region, and the institutional status of the OECD.
- The Secretariat's notable aptitude in **operating efficiently and maximising limited resources**, including through cooperation with other partners, remains at a commendable level.

Additional observations based on new evidence include the following:

- **ACN members' continued commitment to the voluntary network** is further demonstrated through in-kind contributions and outright voluntary membership fees. The latter is a recent development instituted within the current Work Programme.
- The **ACN Secretariat continues to strive to improve operations**. It has implemented the most important recommendations from the previous evaluation, one of them being a fundraising strategy that includes the above-mentioned requests for voluntary membership fees.
- Also commendable is the Secretariat's **significant effort to measure its performance** by tracking outcome-level indicators on specific anti-corruption thematic areas. This is a no simple feat, and highlights both the challenges in measuring country performance in the fight against corruption, as well as the limitations of conventional approaches to measuring programming results.
- These **performance measurement efforts hold a value the entire anti-corruption practitioners community**, for instance by advancing knowledge on the obstacles in obtaining comparative country data (including, for instance, the incongruity of data collection practices among countries is one key obstacle, or identifying meaningful performance benchmarks for reactive functions such as law enforcement).
- While the ACN's contribution to anti-corruption efforts and knowledge is not in doubt, many of the conclusion are drawn on the basis of anecdotes and inference due to a lack of indicators and limited evidence. This evaluation has identified several weaknesses in the results framework, in particular instances where the **relationship between inputs and expected results should be reassessed**.

Recommendations:

The ACN **work on modifying IAP monitoring methodology in order to obtain a comparable scoring system should be continued**. It would be advisable to articulate explicitly (if only internally) whether anything will be lost in comparison with the depth and quality of guidance that the IAP reports have provided to date. The Secretariat should thereafter **monitor the application of the revised methodology both for additional benefits and potential unintended drawbacks**.

The ACN should likewise **continue its efforts to broaden its monitoring efforts to produce a Regional Outlook**, and articulate how this “league table” is to be used (by the countries themselves, by the anti-corruption community) and how it will contribute to the fight against corruption. Here too, the Secretariat should **monitor the process for unanticipated benefits and potential obstacles**.

The Secretariat should **review the results framework for all Work Programme components**. Additional detail would be helpful: for instance, specifying distinct immediate, intermediate, and longer-term outcomes (and their indicators), and the assumed relationship between interventions and anticipated results. Monitoring methodology changes may change the dynamics between the Secretariat and ACN members and affect the anticipated results.

In proceeding, two additional considerations apply. One **the political economy dimension—the elusive “political will”—should be recognised**. It is *the* indispensable “ingredient” for successful reforms and represents the main limitation of possible results of technical assistance alone. The ACN as an outreach initiative of the OECD might therefore also examine its assumptions about the extent to which it can attempt to influence the political economy in the countries where it is engaged. **The expectations about what can be achieved should be reviewed in light of all the above reflections and planned methodological changes**.

Two, **ACN’s regional character should be kept in mind**, and its benefits and limitations clearly considered. Can a regional programme reasonably have the same objectives as a country reform project? The Secretariat might consider, for instance, the logframe for the Ukraine country project compared to the Work Plan logframe segments for LEN or Business Integrity in order to pinpoint the differences in expectations. This process might also consider differentiating between IAP and non-IAP countries in line with the extent of interaction and investments with the respective groups. This evaluation is advancing a hypothesis—to be tested—that a regional initiative, as opposed to in-country technical assistance projects, requires alternative metrics.

Suggested is a **structured review process** consisting of the following elements:

- Research into existing practices of similar initiatives for lessons and ideas;
- Consultations with beneficiaries to gain additional feedback about programme benefits and expectations; and,
- Elaboration of the ACN results framework in detail, and scrutiny of its logic and assumptions; consider in particular the implications of methodological changes and other issues raised in this evaluation;
- Consultations with and donors and other stakeholders about the soundness of the approach;
- Elaboration of the necessary data collection protocols to support the amended framework.

Such a process should ideally provide the ACN with an improved results framework that reflects ACN’s specificities (voluntary regional network), strengths (expertise, high-quality outputs, convening capacity, etc.), and limitations (funding, institutional constraints, etc.) to better document the results of the new Work Programme. Insights gained through this process could also assist other organisations and initiatives facing similar challenges.

5. ANNEXES

External Evaluation

Terms of References

These Terms of References were prepared by the ACN Secretariat as a basis for the evaluation of the Work Programme for 2016-2019 that will be conducted by an external consultant.

For more information, please contact Mrs Olga Savran, ACN Manager, tel. +33 (0)1 45 24 13 81, olga.savran@oecd.org.

Anti-Corruption Network for Eastern Europe and Central Asia

The Anti-Corruption Network for Eastern Europe and Central Asia (ACN) was established in 1998 as a regional forum for the promotion of anti-corruption reforms, exchange of information, elaboration of best practices and donor coordination.¹⁵ The ACN is a regional anti-corruption programme established under the OECD Working Group on Bribery.¹⁶ The Secretariat, which is located at the OECD Anti-Corruption Division, is guided by the ACN Steering Group composed of National Coordinators from ACN countries, as well as representatives from OECD countries, international, and non-governmental organisations. Detailed information about the ACN is available on its website www.oecd.org/corruption/acn. The ACN Steering Group at its meeting on 9 October 2015 adopted the Work Programme for 2016-2019.

Purpose of the Evaluation of the ACN Work Programme for 2016-2019

The ACN Work Programme for 2016-2019 includes a provision regarding its evaluation. According to the Work Programme, its evaluation will be carried out in the framework of the ACN Steering Group. The external evaluation will be carried out by an independent external consultant and will be presented to the Steering Group at the end of the Work Programme. Summary report "Fighting Corruption in Eastern Europe and Central Asia: Progress and challenges for 2013-2015" will serve as a base-line study, describing the situation against which progress will be assessed and comparisons will be made.

The external evaluation will aim to identify the factors of success or failure, to assess the sustainability of results on outputs, outcomes and impact levels and to draw conclusions that may be used for the completion of the current Work Programme and for the development of the future activities. The results of these evaluations will be made available to the donors who provide funding to the ACN activities for their reporting purposes, thus ensuring accountability of the Work Programme implementation.

¹⁵ The ACN is open for all countries in Eastern Europe and Central Asia, including Albania, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Former Yugoslav Republic of Macedonia, Georgia, Kazakhstan, Kyrgyzstan, Latvia, Lithuania, Moldova, Mongolia, Montenegro, Romania, Russia, Serbia, Slovenia, Tajikistan, Turkmenistan, Ukraine and Uzbekistan. OECD countries participate in the ACN as partners or donors. The ACN is open for participation by international organisations, such as the Council of Europe and its Group of States against Corruption (GRECO), the Organisation for Security and Cooperation in Europe (OSCE), the UN Office on Drugs and Crime (UNODC), and the UN Development Programme (UNDP), as well as multi-lateral development banks, such as the Asian Development Bank, Council of Europe Investment Bank, EBRD, and the World Bank. The ACN is also open for participation by non-governmental partners, including Transparency International and other non-governmental and business associations.

¹⁶ The OECD Working Group on Bribery in International Business Transactions is made up of representatives from the Parties to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; for information about the Working Group, please refer to www.oecd.org/daf/nocorruption.

Scope and Focus of the Evaluation

The external evaluation will examine progress of the ACN Work Programme implementation, including activities and their impact, achievements and challenges of the project implementation. The evaluation will cover activities implemented during 2016-2019, and will take into account the governance structure and operating practice established by the ACN over the past decade which provided a context for the implementation of the current Work Programme. It will cover all areas of the ACN Work Programme, including the Istanbul Action Plan, the Thematic Studies, the Law-Enforcement Network and the Steering Group implemented in all ACN countries, and in cooperation with ACN partners such as international, civil society, business and donor organisations. The evaluation should be based on the OECD/DAC assessment criteria such as relevance, effectiveness, efficiency, impact and sustainability, as follows:

1. Relevance

- 1.1. To what extent did the design of the Work Programme and implemented activities address the important issues for and needs of the beneficiary countries?
- 1.2. To what extent does the Programme provide a value added to other on-going anti-corruption activities in the region, builds on comparative advantages and coordinates with other programmes?

2. Effectiveness

- 2.1. How effective were the activities in achieving the objectives of the Work Programme at the output and outcome level (as defined in the logframe)?
- 2.2. Which activities were the most effective in achieving the objectives?

3. Impact

- 3.1. To what extent were the objectives of the Work Programme achieved?
- 3.2. What was the overall impact of the activities implemented under the Work Programme on the fight against corruption in Eastern Europe and Central Asia (as defined in the logframe)?

4. Efficiency

- 4.1. How efficient were the activities implemented under the Work Programme in achieving the objective, i.e. could the objectives be achieved with less or a better use of resources?
- 4.2. Which activities were the most and the least effective in achieving the objectives?
- 4.3. To which extent did the programme management ensure the efficiency of its implementation?

5. Sustainability

- 5.1. To what extent can the impact of the Work Programme be maintained after its completion?
- 5.2. How can the sustainability of the impact be supported in the future?

The evaluation should include recommendations, which can be based on lessons learned from the activities implemented during this Work Programme and can be taken into account during the development of the new Work Programme.

Evaluation Methods and Process

To prepare the external evaluation, the OECD/ACN Secretariat will employ an external consultant.¹⁷ The consultant will be invited to study the various documents, consult with the OECD/ACN Secretariat, ACN beneficiaries and partners, and to prepare an evaluation report that will identify main achievements and challenges of as well as recommendations for improvements that can be taken into account during further implementation of the ACN Work Programme.

More specifically, the consultant will use the following methods for the evaluation:

¹⁷ With the view of a limited budget available for the evaluation, the ACN may employ the same consultant who did the evaluation of the previous Work Programme, as this consultant is already familiar with the ACN and the previous recommendations that came out from the evaluation.

1. Desk review

- 1.1. Study the ACN Work Programme for 2016-2019 and related documents such as summary records of the ACN Steering Group meetings, annual activity reports and other documents related to the Work Programme development and implementation during this period;
- 1.2. Study ACN working documents including those developed in the framework of the Istanbul Action Plan, Thematic Studies and the Law-Enforcement Network; the consultant may also solicit additional information from beneficiaries and partners who took part in these activities and conduct his/her own independent research;
- 1.3. Conduct additional independent research on all aspects related to Work Programme implementation, including research on relevant web sites, media sources and other publicly available information.

2. Consultations

- 2.1. Consult with the OECD/ACN Secretariat: this may involve a mission, telephone or video discussions to the OECD headquarters to meet the OECD/ACN staff members that were involved in the implementation of the Work Programme as well as with other OECD colleagues who were involved in various ACN activities; alternatively – if the budget available for the evaluation is too limited – consultations can be conducted by phone or video;
- 2.2. Consult with the ACN donors: this may involve mission, telephone or video discussions with all the donors that provided funding to the ACN during the assessment period to meet the staff members that were involved in the development and implementation of the ACN Work Programme activities;
- 2.3. Consult with the ACN beneficiary countries: this should involve visits, telephone or video discussions with the countries participating in the project to meet both governmental, civil society, business and international representatives that were involved in the implementation of various ACN activities; however, if the budget available for the evaluation is too limited, the consultant may need to attend the regional meetings organised by the ACN which bring together several representatives from the ACN countries and use written questionnaires;
- 2.4. Consult with partner organisations: the consultant should also liaise with other ACN partners, including other international organisations, such as the OSCE, the UNDP, the UNODC, the World Bank, the EBRD and others, both in their headquarters and in the ACN countries;
- 2.5. Consult with the other organisations and individuals that participated or cooperated with the OECD during the implementation of the project, including the monitoring experts, speakers and other contributors to the ACN Work Programme Implementation.

3. Drafting and finalisation of the report

- 3.1. Analyse gathered data and information and assess the project implementation using the assessment criteria described above;
- 3.2. Prepare a draft of the evaluation report and present it to the OECD Secretariat, the ACN Steering Group, and other stakeholders for review and comments;
- 3.3. Finalise the report based on the comments and present it to the OECD Secretariat and the ACN Steering Group.

Evaluation Report

The report should be prepared in English, and presented in a Word Document of maximum 20 pages (excluding annexes). The report should include the following main chapters:

1. Cover page
2. Executive summary
3. Introduction (objective of the evaluation, its scope and brief description of the evaluation methods)
4. Brief context for the ACN Work Programme implementation
5. Main findings (overall evaluation of the implementation of the ACN Work Programme, main achievements and impact)
6. Lessons learned (potential areas of improvement)
7. Recommendations
8. Annexes (ToR, list of stakeholders consulted, detailed description of the evaluation methodology and process).

Schedule

The timeframe for the evaluation is January - September 2019: the contract with the consultant will be concluded by end February 2019. The inception report should be presented to the Secretariat for comments by 15 March 2019. The Secretariat may provide comments and questions to the draft report. The consultant may be invited to present the inception report at the ACN Steering Group tentatively scheduled for 22 March 2019 at the OECD Headquarters in Paris, France. The consultant will be invited to prepare the draft report by 15 September 2019. The Secretariat may provide comments and questions to finalise the report. The consultant will be invited to address comments from the Steering Group meeting and to provide the final report by 15 October 2019. The summary of the schedule is provided below:

- Recruiting the external consultant – End February 2019
- Inception report presented to the Secretariat – 15 March 2019
- Presentation of the inception report to the ACN Steering Group – 22 March 2019
- Draft report presented to the Secretariat – 15 September 2019
- Final report presented to the Secretariat – 15 October 2019

The Consultant

The consultant will need to have working experience in the ACN region and knowledge of anti-corruption issues. The consultant will also need to have experience of evaluating donor funding projects and projects implemented by international organisations. The consultant should be fluent in English and Russian, knowledge of other languages used in the ACN regional will be an advantage.

Annex 2: Persons consulted

ACN Secretariat /OECD

Ms Olga Savran
Manager
Anti-Corruption Network for Eastern Europe and Central Asia (ACN), OECD

Ms Rusudan Mikhelidze
Consultant
ACN Secretariat OECD

Ms Tanya Khavanska
Legal and Policy Analyst
Directorate for Financial and Enterprise Affairs Anti-Corruption Division OECD

Mr Andrii Kukharuk
Consultant
ACN Secretariat OECD

Mr Dmytro Kotlyar
Consultant
ACN Secretariat OECD

Ms Enery Quinones
Chair of the Istanbul Anti-Corruption Action Plan
Anti-Corruption Network for Eastern Europe and Central Asia (ACN), OECD

Ms Mathilde Mesnard
Deputy Director
Directorate for Financial and Enterprise Affairs, OECD

Mr Drago Kos
Chairman
Working Group on Bribery in International Business Transactions, OECD

Mr Jesper Johnson
Policy Analyst, Strategic Framework of Public Administration Reform
SIGMA, OECD

ACN National coordinators

Mr Kamran Aliyev
Director
Anti-corruption Department, Prosecutor's Office of Azerbaijan

Mr Sabuhi Aliyev
Head of Department
Anti-Corruption Directorate with the Prosecutor General of the Republic of Azerbaijan

Mr Olzhas Bektenov

Deputy Chairman
Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-corruption

Ms Leila Iyldyz
Advisor
Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-corruption

Mr Bayarkhuu Tuvshinsaikhan
Commissioner in Charge, Head of the Department
Prevention and Public Awareness Department
Independent Authority Against Corruption of Mongolia

Ms Bolorchimeg Jargalsaikhan
Foreign Affairs Officer, Commissioner
Independent Authority Against Corruption of Mongolia

Ms Milica Bozanic
Assistant Director, Sector for Foreign Affairs and Strategic Development
Anti-Corruption Agency of the Republic of Serbia

Ms Nigora Muqimi
Head of the international department, civil society and mass media
Main Department on Prevention of Corruption
Agency under the state financial control and fight against corruption of the Republic of
Tajikistan

Mr Evgeniy Korlenko
Head
Academy of General Prosecutor's Office Uzbekistan

ACN Experts

Ms Jolita Vasiliauskaite
Counsellor
Bureau of the Committee on National Security and Defence of the Seimas, Republic of Lithuania

Ms Kätlin-Chris Kruusmaa
Advisor, Criminal policy
Ministry of Justice, Tallinn, Estonia

Ms Airi Alakivi
Diplomatic Delegate, Permanent Representation of the MFA of Estonia to the European Union,
Ministry of Foreign Affairs (MFA)

Mrs Anca Jurma
Prosecutor, Councillor to the Chief Prosecutor of DNA
National Anticorruption Directorate (DNA), Romania

Ms Elena Koncevicute
Senior Anti-corruption Adviser

European Union Anti-corruption Initiative, Ukraine

Mr Vitalii Kasko

Independent Expert, Former Deputy Prosecutor General of Ukraine, Member of the Executive Committee of the International Association of Prosecutors, Partner of the Vasil Kisiil & Partners, Ukraine

Mr Evgeny Smirnov

Associate Director, Procurement Policy Adviser
Procurement Policy and Advisory Department, EBRD

Non-governmental Organisations

Ms Sona Ayvazyan

Executive Director
Transparency International Anticorruption Center, Armenia

Mr Erekle Urushadze

Programme Manager, Anti-Corruption Programme
Transparency International Georgia

Ms Anastasiia Krasnosilska

Head of Advocacy Programs
NGO Anticorruption action center, Kyiv, Ukraine

International partners and donors

Ms Brigitte Bruhin

Policy Advisor
Federal Department of Economic Affairs, Education and Research EAER
State Secretariat for Economic Affairs SECO
Economic Cooperation and Development
Policy and Services (WEPO)

Mr James Callahan

Senior Program Advisor
Bureau of International Narcotics and Law Enforcement Affairs
US Department of State

Mr Claudio Nardi

First Secretary
Office for Foreign Affairs
Principality of Liechtenstein

Mr Chiawen Kiew

Associate Director of Investigations
Office of the Chief Compliance Officer, EBRD

Ms Iris Pilika

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Ms Sigrid Brettel
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DG NEAR, European Commission

Mr Nicholas Cendrowicz
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DG NEAR, European Commission

Mr Irakli Kotetishvili
Policy Specialist, Anti-Corruption and Public Administration
Governance and Peacebuilding Cluster
UNDP, Isanbul Regional Hub

Mr Igor Nebyvaev
Head of Unit, Economic Crime and Cooperation Division
Council of Europe

Ms Aneta Arnaudovska
Anti-corruption Expert
Regional Anti-Corruption Initiative (RAI) – Secretariat

Ms Jasna Panjeta
Programme and Outreach Officer
Regional Anti-Corruption Initiative (RAI) - Secretariat

Annex 3: ACN Work Programme 2016-2019 Logical Framework

OECD mission: To promote policies that will improve the economic and social well-being of people around the world		ACN Work Programme 2016-2019 LOGIC FRAME		ACN goal: To help ACN countries to reduce the levels of corruption
INPUTS	OBJECTIVES and ACTIVITIES	OUTPUTS	OUTCOMES/RESULTS	IMPACT
<p>Each activity makes use of the following inputs:</p> <ul style="list-style-type: none"> • Countries: National coordinators, other state institutions, co-funding of the ACN activities; • Partners: international organisations, civil society, business, researchers and experts; • People: OECD/ACN Secretariat and Consultants and monitoring team members; • Money and other material resources: voluntary contributions, co-funding, OECD core financing. 	<p>4th monitoring round of Istanbul Action Plan (IAP) to improve legal and institutional frameworks of IAP countries and their capacity to enforce international anti-corruption standards in practice by assessing implementation of previous recommendations on anti-corruption policies, prevention and law-enforcement, and developing new ones;</p> <p>Corruption prevention seminars to improve capacity of ACN countries to prevent corruption by promoting recommendations and good practices on prevention of corruption as presented in the relevant thematic study, and to identify new good practices;</p> <p>Law-enforcement network to improve capacity of ACN countries to detect, investigate and prosecute corruption by promoting good practices and recommendations presented in studies on responsibility of legal persons, foreign bribery and MLA and developing new studies;</p> <p>Business integrity seminars to improve capacity of ACN countries to prevent corruption in the business sector by promoting good practices identified in the relevant study and reviewing implementation of policy recommendations.</p>	<p>9 monitoring reports 9 IAP countries, 27 progress updates; 9 shadow NGOs reports; 9 on-site visits, 9 return missions, 4 plenary meetings; summary report</p> <p>7 seminars for prevention practitioners for 25 ACN countries, about 450 experts trained; updated study on prevention;</p> <p>7 meetings of the law-enforcement network for 25 ACN countries; about 450 experts trained; 2 new studies on criminalization;</p> <p>7 meetings of business integrity practitioners for 25 ACN and several OECD countries, about 450 experts trained; review on business integrity.</p>	<p>IAP countries implement UN, OECD and COE standards and good practices, they implement effective anti-corruption reform and IAP recommendations, they adopt effective anti-corruption policies; introduce legislation compliant with international standards and take strong enforcement actions and effective measures to prevent corruption in the public and private sector. As a result, the legislative and institutional frameworks and capacity in the IAP countries are sufficient for effective prevention and combating corruption; governments focus on implementation of anti-corruption reforms;</p> <p>ACN countries take strong actions to prevent corruption implement recommendations and use some of the tools presented in the study, e.g. research, risk assessment, sector specific plans, ethics training, electronic services, access to information, develop and share new practices. They develop good capacity to prevent corruption and take effective and innovative measures to prevent corruption in the public administration, and share their good practice across the region;</p> <p>ACN countries take strong actions to combat corruption, and implement recommendations to establish and enforce corporate liability for corruption, establish foreign bribery offence, and strengthen MLA systems. They develop good law-enforcement capacity; law-enforcement practitioners from ACN countries apply the knowledge and contacts they acquired during seminars in their work; new complex offences are well understood by the ACN law-enforcement practitioners;</p> <p>The governments and the private sector in the ACN countries take effective measures to prevent corruption involving companies; they implement recommendations and apply good practices to promote business integrity; new good practices are identified and disseminated across the region.</p>	<ul style="list-style-type: none"> • In the longer-term, corruption levels in the ACN countries decline; • Public trust in the public sector improves.

ASSUMPTIONS: Political will in the ACN countries to pursue anti-corruption reforms; sufficient resources for anti-corruption reforms; support by international donor community; NGOs and businesses are motivated to participate in anti-corruption activities; political situation is stable and no cataclysms take place to shift attention to other areas.

Annex 4: Participation in ACN events

Prevention seminars*

	New Approaches and Practical Tools to Prevent Corruption at the Local Level - Regional Seminar for Local Level Practitioners, Vienna November 2018	Impact of Corruption Prevention Measures at National and Sectoral Level Issyk-Kul, Kyrgyzstan May 2016 Russian speaking IAP countries
Albania	1	n/a**
Armenia	1	3
Austria	1	n/a
Azerbaijan	2	2
Belarus	1	2
Bosnia-Herzegovina	2	n/a
Bulgaria	1	n/a
Croatia	1	n/a
Georgia	2	1
Kazakhstan	2	4
Kyrgyzstan	2	8
Latvia	2	
Lithuania	2	
Moldova	1	1
Mongolia	2	2
Montenegro	1	n/a
N. Macedonia	2	n/a
Romania	2	1
Serbia	1	n/a
Slovenia	1	n/a
Spain	1	n/a
Tajikistan	2	2
Ukraine	1	4
Uzbekistan		2

*Participant lists for the Regional Seminar "Corruption-Free Cities of the Future" in Tirana, Albania, In December 2017 and the June 2017 seminar "Assessing the Implementation and Effectiveness of Systems for Disclosing Interests and Assets by Public Officials" in Tbilisi were not available.

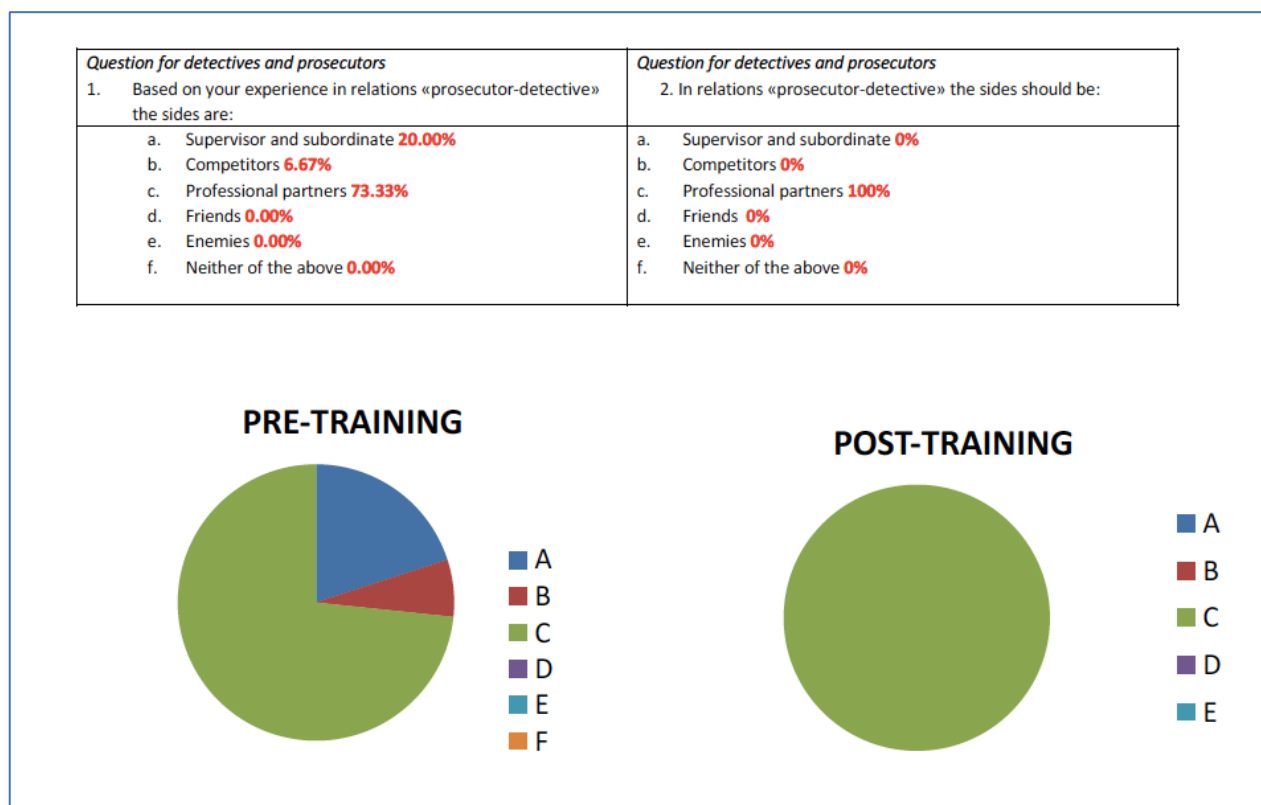
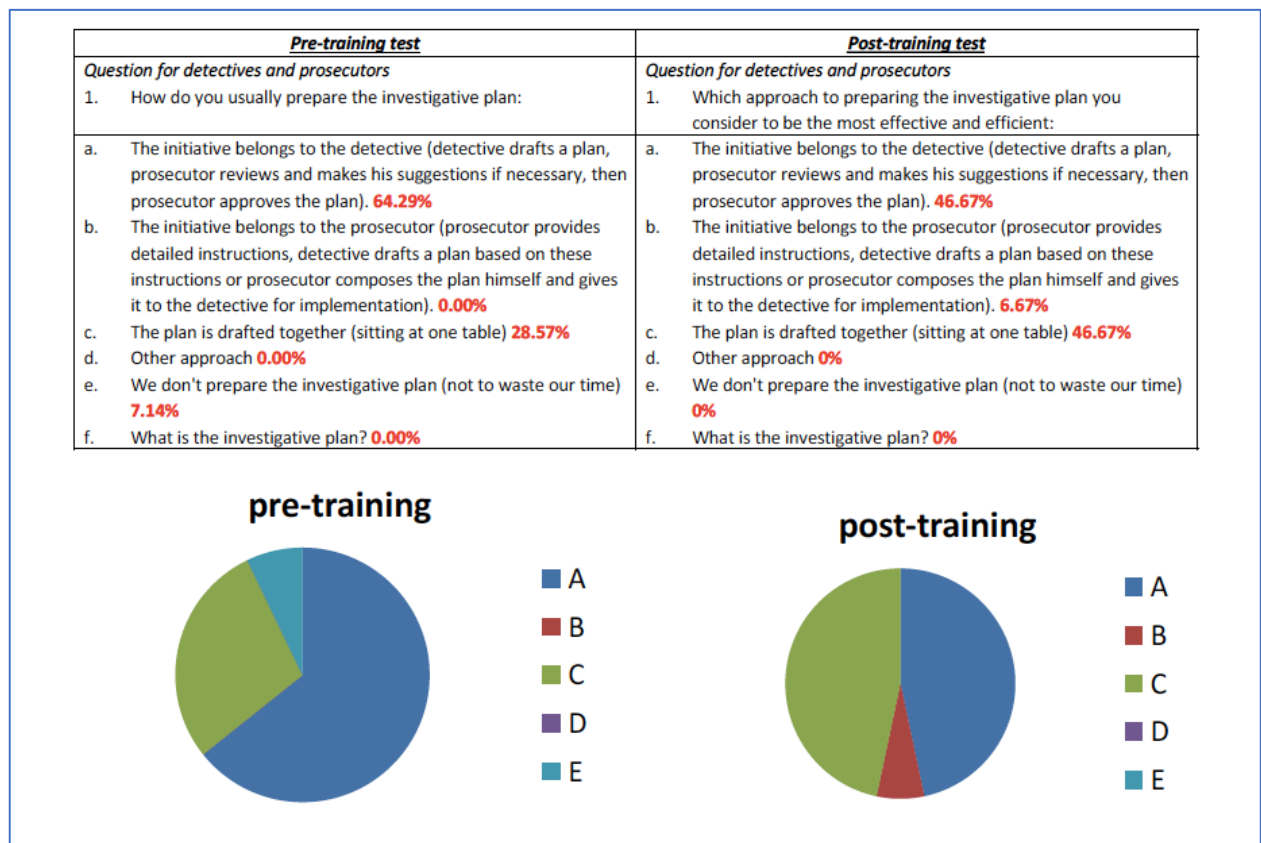
**n/a= not applicable

LEN Event participation

	9th LEN Expert Seminar Prague, Czech Republic November 2018 Independence of Prosecutors, Detection of Corruption and International Cooperation in Corruption Cases	8th LEN Expert Seminar - Baku, Azerbaijan October 2017 Confiscation of Proceeds, Asset Recovery and Independence of Prosecutors	7th LEN Meeting Astana, Kazakhstan December 2016 International Cooperation, Confiscation of Proceeds and Independence of Prosecutors
Albania	1	2	1
Armenia	1		1
Azerbaijan	2	6	2
Belarus	1	1	1
Bosnia-Herzegovina	1	1	1
Bulgaria		2	1

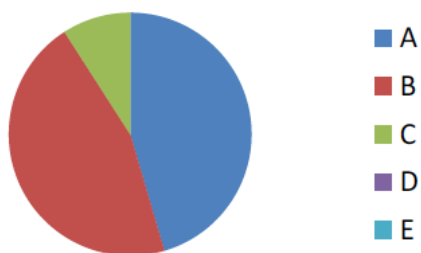
Croatia	1	2	1
Estonia	1	3	3
Georgia	1	2	2
Kazakhstan	1	2	?
Kyrgyzstan	1	2	6
Latvia	1	3	3
Lithuania	1	3	3
Moldova	1	2	2
Mongolia	1	2	2
Montenegro	1	2	1
North Macedonia	1	2	
Poland		1	
Romania	2	2	2
Russia	1	1	1
Serbia	1	2	1
Slovenia			1
Tajikistan	3	2	1
Ukraine	2	6	8
Uzbekistan	1	2	2

Annex 5: Example of knowledge verification results

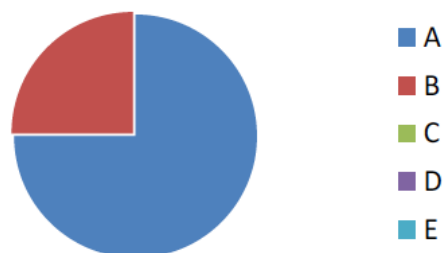


<p><i>Question for detectives</i></p> <p>1. Work of the analysts for your investigations usually is:</p>	<p><i>Question for detectives</i></p> <p>3. За своєю суттю робота аналітиків для ваших розслідувань може бути:</p>
<p>a. Very useful 45.45%</p> <p>b. Sometimes useful 45.45%</p> <p>c. Not important 9.09%</p> <p>d. Harmful 0.00%</p> <p>e. Other 0.00%</p>	<p>a. Very useful 75%</p> <p>b. Sometimes useful 25%</p> <p>c. Not important 0%</p> <p>d. Harmful 0%</p> <p>e. Other 0%</p>

PRE-TRAINING

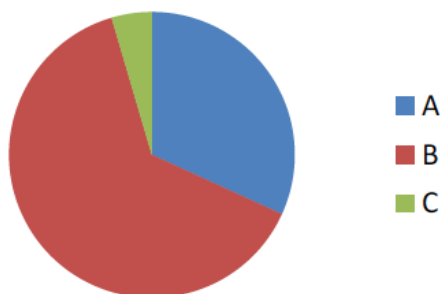


POST-TRAINING

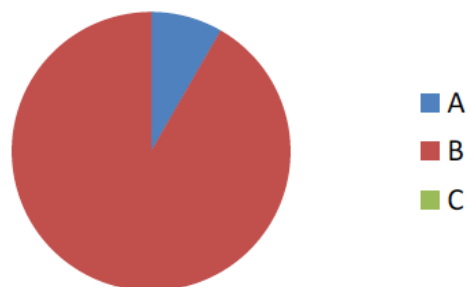


<p><i>Question for everyone</i></p> <p>1. In what way do you see the role of the analysts in the investigations:</p>	<p><i>Question for everyone</i></p> <p>4. In what way do you see the role of the analysts in the investigations:</p>
<p>a. Detectives/prosecutors turn to the analysts with specific tasks if necessary 31.82%</p> <p>b. Analysts are part of the investigative and prosecutorial group 63.64%</p> <p>c. Other 4.55%</p>	<p>a. Detectives/prosecutors turn to the analysts with specific tasks if necessary 8.33%</p> <p>b. Analysts are part of the investigative and prosecutorial group 91.67%</p> <p>c. Other 0%</p>

PRE-TRAINING

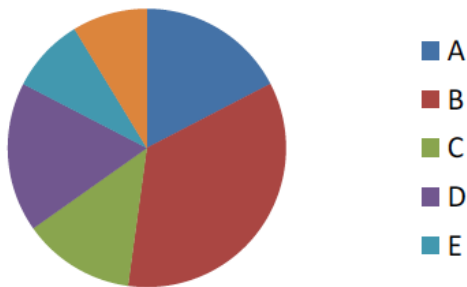


POST-TRAINING



Question for everyone	Question for everyone
5. The most complicated issue in financial investigations for me is:	5. The most complicated issue in financial investigations for me now will be the fact that:
<ul style="list-style-type: none"> a. These crimes are hard to qualify 17.39% b. Most of the evidence is abroad 34.78% c. I'm lacking knowledge to analyze evidence in a proper way 13.04% d. In these cases it is hard to identify the amount of loss 17.39% e. In these cases there are a lot of forensic examinations 8.70% f. Other 8.70% 	<ul style="list-style-type: none"> a. These crimes are hard to qualify 0% b. Most of the evidence is abroad 65.22% c. I'm lacking knowledge to analyze evidence in a proper way 8.70% d. In these cases it is hard to identify the amount of loss 13.04% e. In these cases there are a lot of forensic examinations 13.04% f. Other 0%

PRE-TRAINING



POST-TRAINING

