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Independent project evaluation of the

**Law Enforcement Capacity Building in
the Fight against Illicit Drug Trafficking
in Selected Countries in West Africa**

Project number XAW/U53

Countries: Guinea Bissau, Mali, Senegal, Sierra Leone

Independent Evaluation Unit

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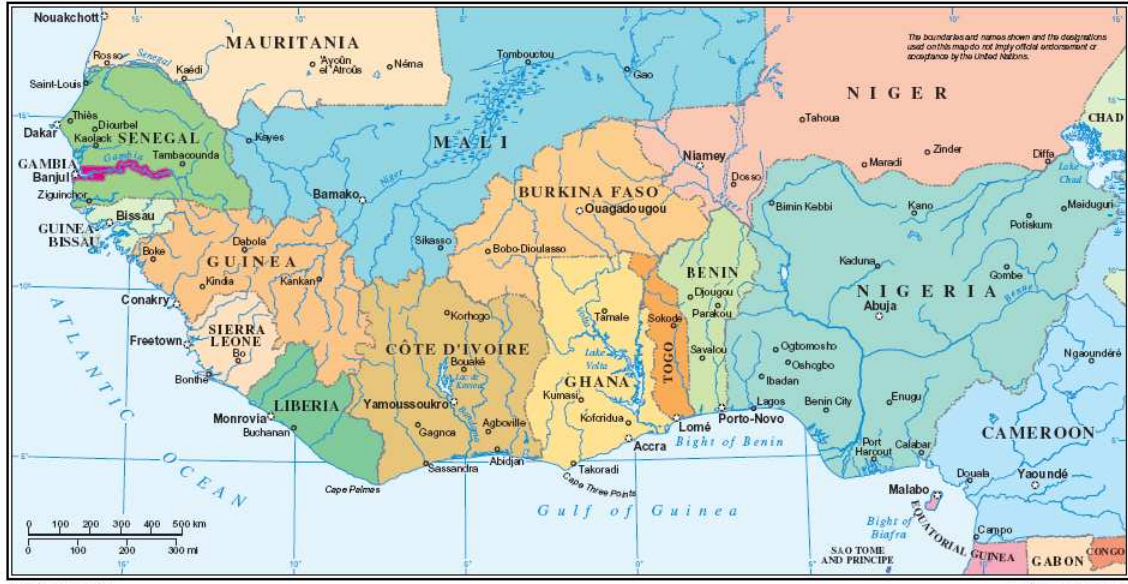
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WEST AFRICA



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ACRONYMS AND ABBREVIATIONS

ACC	Anti Corruption Commission (Sierra Leone)
AML	Anti Money Laundering
CENTIF	<i>Cellule Nationale de Traitement d'Informations Financières</i> – denomination of the FIU in the Uniform Anti Money Laundering Law applicable in Member States of the West African Economic and Monetary Union
ECOWAS	Economic Community of West African States
EU	European Union
FIU	Financial Intelligence Unit
GPML	Global Program against Money Laundering, the Proceeds of Crime and the Financing of Terrorism, UNODC
IPB	Integrated Program and Oversight Branch, UNODC
IT	Information Technology
MoU	Memorandum of Understanding
PEF	<i>Pôle Economique et Financier</i> – specialized units within the Public Prosecutor's Office in Mali
ROSEN	UNODC Regional Office for West and Central Africa based in Senegal
STR	Suspicious Transaction Report
TOC	Transnational Organized Crime
TOCU	Transnational Organized Crime Unit (Sierra Leone)
UNDP	United Nations Development Program
UNODC	United Nations Office on Drugs and Crime

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EXECUTIVE SUMMARY

Introduction and background

This Report provides an independent evaluation of UNODC project XAW/U53, entitled “Law Enforcement Capacity Building in the Fight against Drug Trafficking in Selected Countries in West Africa”. This project is a direct response to one of the main thematic priorities of the ECOWAS Political Declaration and resulting “Regional Action Plan to Address the Growing Problem of Illicit Drug Trafficking, Organized Crime and Drug Abuse in West Africa, 2008-2011”. The project was implemented by UNODC in 2009-2011, with the support of the Government of Italy.

The project objective was to build enhanced capacity of law enforcement agencies to combat illicit drug trafficking to and from beneficiary states, i.e. Guinea Bissau, Mali, Sierra Leone and Senegal. On the basis of preliminary assessment missions conducted in July 2009 beneficiary countries clearly expressed the need for the project to focus on the financial crimes component of drug trafficking and TOC, i.e. money laundering. This would enable the project to usefully complement other assistance initiatives that very much focus on law enforcement capacity building, by providing added value when investigating drug trafficking and organized crime cases.

The implementing activities consisted essentially of specialized training and were complemented with the delivery of IT and office equipment to the beneficiaries.

An independent evaluation was initiated upon completion of project activities. It consisted of a desk review of relevant documents, followed by a field mission that took place from 10 October to 4 November 2011. The purpose of this evaluation was to assess the impact of project activities, as well as to draw lessons from project implementation and make recommendations. Those could be the basis for instituting improvements when planning, designing and managing UNODC technical assistance in the interrelated fields of law enforcement capacity building, countering drug trafficking and anti money laundering.

Main findings

The evaluation mission confirmed that West African countries are extremely vulnerable to drug trafficking and resulting money laundering. This vulnerability is related to geographical, political, legal, institutional, economic and social factors. Trafficking tends to concentrate in countries with unstable political, social and economic situations and weak controls (law enforcement, prosecution, judiciary). Corruption appears to play an important role in criminal activities.

Whilst the countries have all adopted AML laws recently, infrastructures and human capacity to support the implementation of those laws need to be further developed. There is a disparity in AML capacity among countries, with countries like Senegal and to a certain extent Mali have made more overall progress than other countries like Guinea Bissau and Sierra Leone. Overall, coordination between investigating agencies and FIUs remains very weak, because of lack of technical expertise on countering financial crime and money laundering with the various agencies, and to an important extent also because of the lack of trust among them.

The project was considered by all countries as a very welcome initiative to assist them in better apprehending these vulnerabilities. The project was not only acknowledged to have a very practical and operational dimension, but most importantly it enhanced awareness and capacity with beneficiary agencies on countering money laundering as a necessary corollary of drug trafficking and other forms

of organized crime. Consequently specific emphasis was put on the FIUs that serve as a key actor in the fight against money laundering. The FIU of Guinea Bissau was provided with IT and office furniture enabling it to finally become operational. Through the provision of equipment some of the agencies were able to produce files in electronic format and even to develop simple database tools, where they would previously have been using paper. Also the training sessions implemented at the start of the project provided a unique opportunity for stakeholders from various domestic agencies to exchange views and experiences during a three week period, thus enhancing mutual understanding on their specific roles and mandates.

Nevertheless it should be pointed out that the project objective and outcomes, as worded in the initial project document, were fairly optimistic. The wording on the outcomes was adapted in the January 2011 Project Revision. Yet, they have only been achieved to a certain extent, in the sense that there still is a long way to go to further strengthen countries' capacity to effectively combat money laundering. Little concrete operational achievements, in terms of number of investigations, prosecutions or convictions for money laundering could be recorded during the onsite mission. Rather, there was a clear impression with stakeholders that the project had set important premises for enabling such results in the medium and longer term.

Further monitoring will be required for those efforts to materialize into operational successes. This will require further training in conducting financial crime investigations, with due consideration to strengthening database capacity and computer literacy for stakeholders to use IT tools in a most effective manner.

Main conclusions

Stakeholders in all beneficiary countries had very positive overall feedback on the project. The project emphasis on money laundering was acknowledged to be a relevant way to tackling drug trafficking and other forms of predicate crime. This AML approach still is fairly new to some of the beneficiaries.

Though the project enabled to provide a substantial level of input to countries through capacity building and delivery of equipment, further efforts will be required for effectively countering drug trafficking and resulting money laundering. Some countries have already achieved concrete results, whereas in others those efforts still need to materialize in operational successes. New challenges and interventions will be required to capitalize on the results achieved under this project, in the beneficiary countries and eventually in other West African countries.

Strategic focus of the project implementation was rightfully placed on a combination of specialized training and delivery of IT tools. Participants were appreciative of the opportunities to interact with other domestic agencies thus better understanding their respective roles and mandates, in particular concerning the FIUs. Further emphasis will have to be put in particular on the development of database capacity with targeted agencies in each country.

The dimension of international or regional cooperation, though captured under the ECOWAS Operational Plan and initially envisaged in the project document, was not captured in the project implementation. It is captured in most other UNODC projects and could usefully be considered as an additional feature in next step activities.

Main Recommendations

The main recommendations resulting from this independent evaluation are to further build on what could be achieved under this project, both in respect of operational training and strengthening of the use of IT equipment. Essentially they relate to the following:

(a) Operational action against drug trafficking or organized crime should integrate anti money laundering as a key strategic priority. This will require AML and other laws to contain sufficient parameters and safeguards as to ensure that investigations and prosecutions are shielded from political interference.

(b) Domestic authorities, with the support of development partners such as UNODC, should pursue further training and capacity building activities in the field of countering financial crime. Enhanced technical capacity with domestic stakeholders will be achieved through sharing of practical and operational experiences. South-South cooperation should be fostered and where available also the sharing of regional expertise. West African countries that have developed some specific expertise should be invited to support other ECOWAS Members. Domestic and regional training centers should be more actively involved when delivering training activities so as to ensure greater sustainability and long term impact of the training. On the other hand, UNODC should provide further assistance in order to guarantee the sustainability of the training activities financed by the project, both through national and regional projects, within the framework of the ECOWAS Action Plan for West Africa, or through accurate follow-up actions either through headquarters or through the Dakar regional office.

(c) Sustainability and the achievement of operational results will benefit from the creation of specialized pools of expertise. This should be pursued through the creation of dedicated institutions such as the FIUs, TOCU (Sierra Leone) or PEF (Mali).

(d) Domestic authorities, with the support of international partners such as UNODC, should make further efforts to build (basic) database tools and to enhance the use of those tools through stronger computer literacy. Concerning the provision of computers and other IT material, the beneficiaries should consider potential maintenance problem in the medium term.

(e) When developing projects, due consideration should be given to providing a detailed description of objectives, outcomes, outputs, indicators and coordination mechanisms. Project implementation would benefit from a more realistic planning of activities.

Main lessons learned

Analyzing/investigating money laundering that could result from predicate offences requires substantial changes in the way law enforcement conduct their work. As a policy, investigations from drug trafficking or other forms of crime should systematically try to uncover the illicit money flows.

The way drug traffickers operate becomes more and more complex, including in West Africa. The traditional approach and tools to counter crime are limited if one wants to apprehend those phenomena in an effective manner. If well understood, the incrimination of money laundering constitutes an innovative tool that has the potential to alleviate requirements in respect of burden of proof and obtain convictions and asset confiscations. Such policies will require efforts to enhance the trust relationship among various domestic agencies, as well as the developing and strengthening of database tools in all countries, in electronic format so as to enable centralization and accessibility of information.

I INTRODUCTION

1.1 Background and context

The exposure of West Africa to international drug trafficking has become a major concern in recent years. Evidence of cocaine transiting through the region and of the operation of organized crime groups has been growing. The attraction of West Africa comes from its geographical location, between Latin America and Europe, but also from other features that make it particularly vulnerable to all sorts of illicit trafficking such as weak institutional capacity with limited resources, soaring corruption, porous borders, informal and cash based economies, etc.¹

A direct consequence of these phenomena is the influx of large sums of cash that constitute the proceeds of crime and that need to be laundered, either domestically or after being transferred abroad. Though perception on the vulnerability linked to the laundering of illicit funds is still weak throughout the region, it does pose a serious threat to the stability and reputation of the regulated financial systems and hence to one of the main levies of economic development. Money laundering and other forms of financial crimes also contribute to seriously affecting societies by further encouraging corruption, illicit trafficking and other forms of predicate crimes, thus enhancing the feeling of impunity and lawlessness.

Aware of these threats, the ECOWAS countries in December 2008 adopted a Political Declaration that endorsed a Regional Action Plan “to Address the Growing Problem of Illicit Drug Trafficking, Organized Crimes and Drug Abuse in West Africa, 2008-2011”. Some ECOWAS Member States including Guinea Bissau, Mali and Sierra Leone have endorsed national strategies to counter drug trafficking and organized crime, which were launched with assistance from UNODC.

The project entitled “Law Enforcement Capacity Building in the Fight against Drug Trafficking in Selected Countries in West Africa (XAW/U53)” was designed as a direct response to one of the main thematic priorities of the above mentioned ECOWAS Regional Action Plan. It was also meant to complement other UNODC priority interventions ongoing in the beneficiary countries, i.e. Guinea Bissau, Mali, Senegal and Sierra Leone.

The overall objective of the project was to “build the capacity of law enforcement agencies to combat illicit drug trafficking to and from beneficiary states.” The project outcome, as revised in January 2011, was that “the beneficiaries (would) more effectively combat the money laundering aspects of drug trafficking and organized crime”. This outcome was to be achieved through two outputs:

- (a) National authorities possess the required knowledge and logistics to conduct their work
- (b) Beneficiary structures are assisted in their daily work and international relations

UNODC was chosen as the executing agency for the project, using its Regional Office for West and Central Africa based in Dakar, Senegal and in close liaison with UNODC Headquarters in Vienna. UNDP was in charge of executing financial issues. In November 2009, a Consultant was recruited to be in charge of supporting the coordination and implementation of project activities, together with the Project Coordinator.

Most of the training activities were implemented with expertise provided by the Italian Guardia di Finanza who was the main implementing partner. The Italian Guardia di Finanza dedicated ten of its staff to conduct training missions in each of the beneficiary countries. Activities were implemented in

¹ Transnational Trafficking and the Rule of Law in West Africa: A Threat Assessment, UNODC, July 2009

French (Mali and Senegal), English (Sierra Leone and Guinea Bissau) and Portuguese (Guinea Bissau).

The project was initially meant to be implemented within a 12 months period, from 1 April 2009 to 30 March 2010. Based on the July 2009 assessment missions the project implementation strategy had to be further elaborated. This enabled to tailor down the activities to meet the requirements expressed by the beneficiary agencies. Together with a number of delays in the delivery of activities, the project had to be revised on three occasions and extended in time. Further project activities were proposed and more time was required to implement those activities. Eventually the project was extended until the end of 2011.

The total budget of the project was 1.288.878 USD. It remained the same along the various project revisions.

1.2. Purpose and scope of the evaluation

The purpose of the evaluation was to assess the impact of project activities, to draw lessons from the project implementation, to make recommendations regarding best practices and to highlight deficiencies that could be the basis for instituting improvements to new projects planning, design and management of UNODC technical assistance in the interrelated fields of law enforcement capacity building, countering drug trafficking and anti money laundering.

The evaluation was conducted in Senegal, Mali, Guinea Bissau and Sierra Leone after a meeting with the UNODC Headquarters staff in Vienna, from 10 October 2011 to 4 November 2011. The overall purpose of the evaluation was to assess to extent to which the objective of the project has been achieved and point the way forward. Specifically, the evaluation sought to assess the impact of the project, and to make recommendations to improve new project planning, design and implementation.

The evaluation assessed the above in each of the four beneficiary countries by focussing on both components of the implementation strategy, i.e. the training activities and the delivery of IT/office equipment.

In particular the evaluation addresses quality criteria such as project relevance and utility, impact, effectiveness, efficiency and sustainability, as well as lessons learned and best practices.

1.3 Evaluation methodology

The evaluation team was conducted by one Independent international Evaluator recruited by UNODC in September 2011. Unlike what was announced, no representative from the project donor country joined the mission.

The evaluation was conducted in the following stages:

(a) desk review of relevant documents related to the project such as project documents, concept papers, log frame, action plans, annual work plan, terms of reference for consultancies, official correspondence, training modules and project progress reports;

(b) drafting of an inception report that was submitted to the UNODC Independent Evaluation Unit;

(c) meetings with all key stakeholders during a field visit to Vienna, Dakar, Bamako, Freetown and Bissau. Interviews were conducted with UNODC staff (both UNODC Headquarters and UNODC Regional Office for West and Central Africa), with representatives from the beneficiary agencies in all four countries, and with representatives of the implementing partners (Italian Guardia di Finanza);

(d) drafting of the evaluation report.

The respondents for the study were selected from key stakeholders such as domestic agencies of beneficiary country, UNODC Regional Office in Dakar and relevant staff at UNODC Headquarters in Vienna. Both probability and non-probability sampling techniques were employed. To reduce sampling error, stratified random sampling techniques were used to undertake the survey. Respondents abreast with knowledge and experience on the project were purposively selected to conduct in-depth interviews. This target population provided lessons learned, best practices, effectiveness and efficiency and feedback on how to improve future implementation.

1.4 Limitations to the evaluation

The evaluation exercise was conducted without substantial limitations. This being said, the rather summary way in which the initial project document was drafted did not facilitate in identifying what exactly had to be evaluated. The objectives, outcomes and outputs were broadly defined and the framework for implementation set out in the document did not contain too many details. It explicitly stated that the overall operational strategic approach and implementation modalities of the project would be discussed later on among UNODC staff and other selected experts. It provided little concrete information on implementing modalities, on the design and content of activities, on linkages between the training materials and equipment needs, or on arrangements to properly manage project implementation. This was remedied to an important extent in the January 2011 project revision, which sets out concrete activities under each output.

Communication with some of the beneficiary authorities in Guinea Bissau might have been smoother if a Lusophone interpreter had been made available. Also, there were limitations to the quality of the data sources. For example, an interview was conducted with the representative of the beneficiary agency who had been appointed recently. He was not fully familiar with the extent to which their agency had benefitted from the project. This was partially compensated through additional interviews with their staff who had themselves benefitted from the training.

Next to that there were some logistical arrangements that could have facilitated the organization of the on site visits in some of the countries. No means of transportation was provided to bring the evaluator to various meeting venues in Dakar.

II. EVALUATION FINDINGS

2.1 Design

The project was designed as a direct response to one of the main thematic priorities of the 2008 ECOWAS Regional Action Plan on countering drug trafficking and organized crime. It was one of the first projects to be elaborated after the adoption of this Action Plan. The stated objective of the project was to enhance capacity of law enforcement agencies to combat illicit drug trafficking to and from beneficiary states. Capacity would be built through two main strategic approaches which are (1) provision of specialized training complemented by (2) the delivery of IT and office equipment. Guinea Bissau, Mali, Senegal and Sierra Leone were chosen as the beneficiary countries. A substantial project revision was conducted in January 2011. Details of outcomes and outputs are shown in Annex 1 .

It is understood that due to certain time constraints the initial project document had to be produced under extremely tight pressure. This resulted in many essential components of the project to use broad and rather imprecise wording, in particular with regard to project outcomes and outputs. It explicitly stated that the overall operational strategic approach and implementation modalities of the project would be discussed later on among UNODC staff and other selected experts. It provided little concrete information on implementing modalities, on the design and content of activities, on linkages between the training materials and equipment needs, or on arrangements to properly manage project implementation. The document merely stated that the project would coordinate with country specific strategic frameworks or other technical assistance initiatives being provided in each of the beneficiary countries, without going further into detail.

As a result the initial project document essentially served the purpose of formulating a proposal to seek funding for starting to implement sections of the ECOWAS Regional Action Plan, whereas the objectives, outcomes and outputs would be further elaborated following the assessment missions. Those assessment missions conducted in each of the four countries in July 2009 enabled to address these considerations by identifying needs expressed by domestic authorities to meet the project objectives. The main outcomes of the assessment missions were twofold:

(a) the project objective was reoriented. The focus of the project would shift to countering the financial crimes and money laundering resulting from drug trafficking, rather than to focus on the traditional law enforcement approach to drug trafficking ;

(b) the project activities would be extended beyond ‘law enforcement agencies’ in the strict sense of the word, by including also the Financial Intelligence Units as well as representatives of judicial authorities (prosecutors) among the beneficiaries of the project.

Subsequently a work plan for training activities and for the purchase of office equipment was elaborated. Later on further implementing activities were proposed, thus setting out more concrete outcomes and outputs, and requiring the project to be extended in time through formal project revisions.

In January 2011 the project outcome and outputs were reformulated to make the structure of the project clearer. The outcomes were merged into a single one (“the beneficiaries more effectively combat the money laundering aspects of drug trafficking and organized crime”) with two main outputs (1.1: “National authorities possess the required basic knowledge and logistics to conduct their work” and 1.2.: “Beneficiary structures are assisted in their daily work and international relations”).

Also new indicators and means of verification were captured in the revised document, thus adding to the coherence with the new outcomes and outputs. The indicators stated in the initial project document were not always the most relevant elements to match against the proposed outcomes and outputs (e.g. 'improved rated of conviction' could not have been achieved through training law enforcement without also targeting judges).

The 2011 revision did not address project management mechanisms and in particular reporting lines and communication towards the donor. Those could have been set out more clearly, which would have avoided occasional confusion and delays in project implementation.

2.2 Relevance

As a direct response to several needs expressed in the ECOWAS Political Declaration and Regional Action Plan of December 2008 in the area of prevention of drug abuse, illicit drug trafficking and organized crime in West Africa, the project targeted:

- (a) the long term need for capacity building for law enforcement agencies in the sub region;
- (b) the need for more efficient international coordination of activities, particularly when tackling transnational organized crime; and
- (c) the need for increased data collection on drugs and crime trends.

The assessment missions conducted in each of the four beneficiary countries enabled to specify those needs and to complement them with other objectives such as:

- (a) the relevance of countering money laundering resulting from drug trafficking, as a new approach to countering drug trafficking and other forms of predicate crimes;
- (b) the need to strengthen domestic cooperation, by involving not only law enforcement agencies but also other stakeholders such as Financial Intelligence Units² and judicial authorities;
- (c) the need to deliver activities that would most usefully complement other ongoing technical assistance activities in the beneficiary countries, provided either by UNODC or by other international partners in the field of anti money laundering or law enforcement capacity building. This aims at avoiding duplication with other projects such as the establishment of TCUs in Guinea Bissau and Sierra Leone, activities provided under the Mali NIP, capacity building provided by or through GIABA, etc.

The project emphasis on money laundering and financial crime is extremely relevant and valid. Overall, countries so far have put insufficient emphasis on this necessary corollary of drug trafficking or other forms of predicate crimes throughout West Africa, even though all four beneficiary countries have adopted anti money laundering laws. Tackling drug trafficking or other forms of predicate crime through their money laundering component is still innovative throughout the region.

Another focus of the project activities was on strengthening database capacity. This is fairly new but of the utmost importance, in particular when dealing with money laundering investigations. The latter require the agencies involved to trace illicit money flows deriving from trafficking or other predicate offences. All agencies involved including the FIUs need to pay due attention to strengthening their

² A Financial Intelligence Unit (FIU) is a central, national agency responsible for receiving (and, as permitted, requesting), analyzing and disseminating to the competent authorities, disclosures of financial information: (i) concerning suspected proceeds of crime and potential financing of terrorism, or (ii) required by national legislation or regulation, in order to counter money laundering and terrorism financing.

database capacity, to supply them with information against which to match the data appearing in their investigations. Those include information on financial transactions but also data on ownership of businesses, real estate, relationships between individuals, to enable to identify the financial, professional and social environment of those under investigation. This dimension was captured in the project through the training modules and the IT equipment that were delivered in all beneficiary countries.

Likewise effectively countering crime, either illicit trafficking or money laundering, cannot be achieved without effective cooperation among domestic agencies. The attention paid by the project to this aspect of countering financial crime is equally relevant. Such cooperation has several dimensions. It targets i.a.

(a) interaction among law enforcement agencies, such as specialized agencies and those that have a more general mandate; and

(b) cooperation between law enforcement agencies and the FIU. FIUs have been established recently and under the terms of the legislation in each of the four beneficiary countries they are designed as administrative bodies. Other stakeholders have become familiar with the specific mandate of the FIU and of how they should cooperate in operational matters. Alternatively if there is a lack of trust or if they see each other as competing agencies this would seriously restrict the potential to effectively counter money laundering;

(c) interaction between investigative bodies and the prosecuting agencies. Countering drugs and crime has been observed to be ineffective in many countries throughout West Africa due to the absence of communication or trust between law enforcement and the judiciary.

At the time of the July 2009 needs assessment missions, Senegal was identified as the country that had made the most progress in this field through the establishment of their CENTIF in 2005. The latter has been analyzing a growing number of files suspected of being related to the laundering of illicit funds, including drug money, and some of those files have been forwarded to the judicial authorities. Despite these achievements further needs were identified to strengthen investigative capacity with law enforcement agencies thus making them better understand how to cooperate among them and with the CENTIF. The project also enabled to make them understand that money laundering is not an exclusive area of investigation for the CENTIF, but that their own investigations should include money laundering components.

Similar conclusions can be drawn for the other three countries. Though the progress they had made by the time the project started was not as important as the one made by Senegal, the project could rely on some acquis. Mali already had an operational CENTIF and established the Pôle Economique et Financier to serve as specialized pools of expertise at the Public Prosecutor's department, consisting of both prosecutors and members of the Judicial Police. Sierra Leone's FIU was still struggling to get operational and the CENTIF Guinea Bissau was only formally in place. Its members had been appointed but by 2009 the unit still didn't have premises or any financial means to start operating.

2.3 Efficiency

The project had one stated objective which was to enhance capacity of law enforcement to combat illicit drug trafficking to and from the beneficiary states. This objective would be pursued through capacity building on countering the financial crimes component of drug trafficking, i.e. money laundering. The project outputs were articulated around the acquisition of knowledge (training) and logistics (equipment), as well as through mentoring activities and study tours.

The evaluation mission identified that the following activities were delivered:

(a) assessment missions to all four beneficiary countries, in July 2009;

(b) development of training programs on anti money laundering, intelligence analysis and financial investigation techniques by a group of Italian Guardia di Finanza experts, in French and in English;

(c) delivery of three week training courses in each country, between February and April 2010;

(d) delivery of a one week specialized training session for the CENTIF Senegal in April 2010;

(e) procurement, purchase and delivery of IT equipment to all agencies involved in the training sessions;

(f) study tours for FIU representatives of Guinea Bissau and Sierra Leone to counterpart units in Brazil and Malawi respectively (January/February 2011);

(g) procurement and delivery of office equipment for the CENTIF Bissau which enabled the unit to inaugurate its premises on 12 April 2011;

(h) procurement and delivery of office equipment to PEF in Bamako, Mali, including the refurbishment of a custody room at their premises;

(i) deployment of Italian Guardia di Finanza experts in Mali (May and October 2011) and in Sierra Leone (May 2011) to follow up on the training provided in 2010;

(j) expert mission by representatives of the Portuguese FIU to the CENTIF Guinea Bissau, followed by an AML/CFT awareness raising and training workshop for domestic stakeholders;

(k) independent evaluation and closing event.

The initial project document provided for a 12 month timeframe for implementing all activities, starting on 1 April 2009. This timeframe can hardly be considered as realistic to implement such an ambitious regional project with a substantial amount of funds. Factors such as the time required for hiring a Consultant, for identifying suitable dates for organizing three week training sessions consecutively in four countries, for avoiding holiday seasons, etc. inevitably resulted in the need to extend the project in time. Also there were delays in procuring goods with UNDP, delays in processing the formalities related to the hand over of equipment to beneficiary agencies, security considerations that had to be clarified before bringing external experts to the region, etc. The project was revised and extended in time on three occasions. This also enabled to propose new activities that were not envisaged initially and that could still be implemented given the availability of funds. Eventually the project implementation required over 30 months. Given the geographical scope of the project and the amount of funds available, it would have been much more realistic to use a timeframe substantially longer than the one that was initially anticipated.

It should be noted that the administrative requirements under UN rules and procedures that had to be completed before equipment could physically be handed over in many cases substantially delayed this process. This not only created problems of storage. It could also possibly lead to serious issues in respect of liability for damage or loss before receipt by the beneficiaries. One monitor went missing whilst stored with UNDP in Guinea Bissau. To date UNDSS did not complete its investigation. Additional equipment for the CENTIF Mali had been purchased and delivered to UNODC early 2011, but had not yet been handed over to the beneficiary agency, at the time of the evaluation onsite visit, because official correspondence had been lost with the Ministry of Economy and Finance. The process was reinitiated and should be completed before the end of 2011. Also some situations were observed in which the beneficiary agencies did not return the hand over form with their signature³ (Gendarmerie in Senegal) or were reported not to be using some of the equipment (UPS machines with Judicial Police in Mali and server with FIU Sierra Leone⁴).

³ Despite reminders sent by UNODC the Gendarmerie in Senegal never completed the procedure.

⁴ See below under 2.5. (ii)

As described in the initial project document the institutional arrangements were very summary. Consequently they had to be articulated in the course of implementation. On 1 November 2009 a Consultant was hired to support the coordination and implementation of project activities. The consultancy contract could be extended for the entire duration of the project, including after project revisions, thus ensuring coherence and continuity. Her recruitment coincided with the formal designation of the GPML Regional Advisor on AML/CFT, based at ROSEN, as project coordinator. The latter had articulated the strategic orientations of the project at the end of the July 2009 assessment missions. His involvement enabled to coordinate the project with other ongoing AML related activities delivered through UNODC in the beneficiary countries.

Coordination took place with IPB at UNODC Headquarters, and the latter coordinated with the donor through its Permanent Representation in Vienna. IPB provided appropriate backstopping and feedback to the field, thus bridging between the donor and field staff. UNODC ROSEN kept the Ambassador of the donor country informed of the stage of implementation and of strategic developments, and also the liaison officer of the Italian Guardia di Finanza based in Dakar, thus ensuring transparency along the entire implementation process.

Project implementation was monitored through (semi-) annual progress reports, as well as other reports and updates from the project implementing staff. Also mission reports were obtained for all missions delivered by the project staff, by the external experts who delivered training initiatives (Italian Guardia di Finanza, UIF Portugal), as well as by the beneficiaries of the study tours (Guinea Bissau and Sierra Leone).

2.4 Partnerships and cooperation

In addition, project implementation was coordinated with other ongoing domestic programs or UNODC projects in Guinea Bissau, Mali and Sierra Leone, in particular of the following:

(a) in Guinea Bissau: UNODC projects GNBU44 (in as far as it targets the capacity of the Judiciary Police to conduct intelligence led law enforcement operations) and GNBU47 (in as far as it targets strengthening the institutional and human capacity in the judicial administration, through ending the prevailing impunity in drug related or organized crime). The coordination made sure that the project activities would not overlap, given that the project target audience included some of the same beneficiaries. Complementarity was ensured i.a. through the focus on the CENTIF which was not covered under the other UNODC projects. Also, the operationalization of the CENTIF Guinea Bissau was coordinated with GIABA. The latter agreed to pay the rent for the CENTIF premises, whereas the project funded its IT and office equipments ;

(b) in Mali: the National Integrated Program on countering drug trafficking and organized crime, which i.a. aims at strengthening capacity with different agencies in charge of fighting money laundering, financing of terrorism as well as corruption. Though activities under project XAWU53 were distinct from those provided under the NIP, they shared the common objective of enhancing capacity building with relevant authorities in particular in the field of countering money laundering ;

(c) in Sierra Leone: the activities on capacity building for law enforcement were coordinated through the United Nations Integrated Peace-building Office for Sierra Leone. In the field of anti money laundering, UNODC is also coordinating activities with the World Bank which has been providing AML/CFT assistance to the Bank of Sierra Leone and the FIU in the field of financial sector supervision.

2.5 Effectiveness

Interviews with representatives from all beneficiary agencies revealed that they had positive feedback about the benefits of this project. To some agencies more than others, analyzing or investigating money laundering was a new approach to countering predicate crimes and the quality of the expertise provided during training sessions undoubtedly resulted in enhanced capacity. Also the use of IT equipment provided under the project and the building of institutional capacity in particular with the CENTIF Guinea Bissau have contributed to a great extent in securing a substantial level of achievement.

Many of the indicators stated in the project document, whilst being entirely valid as such, did not seem to be measurable or to relate directly to the objective. Indicators such as ‘increased number of drug seizures’ or ‘improved rate of convictions for drug trafficking’ could materialize also irrespective of the project. The indicators highlighted in the January 2011 revised project document make reference to the number of case files related to drug trafficking and money laundering being investigated or prosecuted in the beneficiary countries. Few law enforcement and judicial authorities do keep such statistics. Only the Senegal FIU reported an increase in the number of convictions for money laundering⁵.

Rather, there are other elements which confirm that the objective has been achieved such as:

(a) the use by beneficiary agencies of the IT equipment that was delivered, in particular the computers to draft reports and other documents relevant to investigations or prosecutions;

(b) the use by beneficiaries of the servers provided to the Judicial Police of Senegal and the PEF in Bamako to enhance linkages between the various members of these agencies, thus facilitating the coordination of their operational work ;

(c) the fact that i.a. the PEF of Bamako has effectively been integrating the ML dimension in a number of investigations for predicate crimes;

(d) the creation of institutional capacity with the CENTIF Bissau which did exist only formally before the project started.

Although the onsite mission could not identify situations where beneficiaries of the IT equipment were insufficiently able to use them, this might have deserved some more attention in order to make sure that the project outcomes would be more sustainable.

This being said it is difficult to measure the precise extent to which the project outcome and outputs have been achieved. This results from the absence of official statistics with most of the beneficiary agencies, from the broad and ambitious nature of the project objective, but most importantly from the profound change in strategic approach it requires from law enforcement agencies and judicial authorities.

When investigating or prosecuting drug trafficking or other forms of predicate crime, they should pay due attention to including the money laundering dimension. In addition they should take note of the existence and specific mandate of the FIU, as a new institutional actor, though without generating the perception that the FIU has a monopoly in the field of countering money laundering. The money laundering incrimination should be regarded as a tool that can be used by law enforcement and the judiciary even without intervention by the FIU.

Although the first training sessions under this project were delivered early 2010, transposing the learning of those sessions into operational practice is a lengthy process and can only yield concrete results in the medium or long term. It is too early to draw firm conclusions, except that there are concrete indications of the following achievements.

⁵ Three convictions in 2010 and five in 2011 (at the time of the onsite mission).

Pools of expertise in the field of countering financial crimes have been created among the beneficiary agencies. For instance the PEF of Mali, in particular the one of Bamako but also those of Kayes and Mopti, have benefited from the three week training and two follow up missions. Interviews with the beneficiaries have confirmed their familiarity with the AML law and the legal tools it provides for countering various forms of crime. Similar conclusions can be drawn for other agencies such as the TOCU and ACC in Sierra Leone, the CENTIF in Guinea Bissau and the Judicial Police in Senegal.

The equipment resulted in enhanced capacity with all recipient agencies, to the extent that most of it is effectively being used for purposes of producing investigation reports and in some cases for compiling simple databases. AML investigations require authorities to be able to access and query a range of data before they can effectively reconstitute money trails.

The CENTIF Bissau has been placed in material conditions that enables it to receive and analyze STRs. Although at the time of the evaluation visit no STRs had been sent to the unit, the CENTIF received its first STR from a commercial bank in mid-December 2011. The disclosure was made by a bank representative that had participated in the training seminar organized under this project in Bissau, in October 2011.

There are also concrete elements that demonstrate enhanced investigative capacity in all beneficiary countries. The FIU of Sierra Leone for instance has developed a modest database format in excel, which at this stage is adapted to their needs. Though as long as the country's new AML is not passed, the FIU will still lack the authority to more effectively exploit these data.

The project outputs focused around (i) the organization of training sessions on crime investigation techniques, including financial crimes, and on methods of intelligence gathering, storage and analysis, (ii) on the procurement of essential equipment and on (iii) the creation of mechanisms to facilitate sharing of information at national level.

(i) Training activities implemented through the project consisted of three week training sessions on countering money laundering and financial crime for about 25 representatives of various agencies in each of the beneficiary countries (separately) in early 2010, expert missions to Mali and Sierra Leone in 2011 to follow up on the training that was provided in 2010, and an awareness raising/training seminar in Guinea Bissau for domestic stakeholders.

The activities delivered with the Italian Guardia di Finanza focused on key components of analyzing financial data and investigating criminal files related to either drug trafficking or other forms of predicate crimes, and on tracing resulting money flows. Participants appreciated the three week duration of the 2010 trainings, the opportunity it provided to engage and familiarize with other domestic agencies, and the focus on practical case examples. The 2010 training sessions were delivered with each participant using a desktop computer, which enabled them to develop or in some cases acquire basic computer literacy. Part of the training focused on database design and management, using basic IT tools such as excel or access. Two follow up missions by an Italian Guardia di Finanza expert in Mali and one in Sierra Leone provided an opportunity to refresh the learnings acquired in 2010.

Other activities specifically targeted the FIUs of the beneficiary states. Those included the study tours for three FIU representatives from Guinea Bissau and two from Sierra Leone to Brazil and Malawi respectively. The choice of those partner countries was particularly well thought through and should be taken as an excellent example of South-South cooperation. In addition to being a Lusophone country, Brazil is recognized to have an effective FIU with long standing experience in analyzing financial information. The choice of Malawi as a partner for the Sierra Leone FIU was motivated by fair similarities between both jurisdictions, in respect of overall economic and social development, size of the financial system, legal system and language. Malawi has gained substantial experience in setting up an FIU and recently became a Member of the Egmont Group. Representatives of the Malawi unit had provided expert participation in two training sessions organized in Freetown. Also assistance provided by the Portuguese FIU to the Guinea Bissau CENTIF through a two week expert mission was instrumental in helping the latter to set up its operational plan and effectively start the process of receiving and analyzing STRs. As indicated above the CENTIF received its first disclosure

in December 2011 through a representative from a commercial bank who participated in the October 2011 training seminar organized under this project.

(ii) All agencies that participated in the training sessions were provided with computers and other IT equipment. In line with the needs assessment conducted in July 2009, emphasis was put on some key institutions such as the Judicial Police of Senegal, the CENTIF Guinea Bissau, the PEF of Bamako and the Transnational Organized Crime Unit in Sierra Leone. Onsite missions have confirmed that the computers, photocopying machines, printers and faxes were being used. Stakeholders raised comments though about the high cost to purchase the toners for the printers that were provided under the project⁶, which might make them useless if their agency was unable to pay such high costs. From the four agencies that were provided with a server on the basis of the June 2009 assessment, only the PEF in Bamako and the Judicial Police in Senegal were effectively using it. The one for the CENTIF Guinea Bissau had only recently been installed and connected to all their computers. It is expected that it will assist in organizing the operations of the unit, as highlighted also by the expert from the Portugal FIU during his expert mission in October 2011. The FIU of Sierra Leone has been struggling to effectively start the process of receiving and analyzing STRs. Since the initial stages of the project, political commitment to countering money laundering has been fading. The draft AML/CFT Bill which would strengthen the authority of the FIU and which has been pending for more than three years, was not yet adopted at the time of the evaluation visit⁷. The unit is still housed in a temporary location in the Bank of Sierra Leone building, where the server is safely stored until it gets assigned to a more permanent location. It is unclear when or even whether that will happen. The FIU staff were able to use the computers to compile a database of currency transaction reports⁸, thus providing concrete follow up to some of the modules contained in the 2010 training. However little concrete results could be obtained through the analysis, in part because of concerns with domestic stakeholders regarding data confidentiality which have limited the disclosure of STRs to the Sierra Leone FIU.

One of the most visible achievements of the project is the operationalization of the CENTIF Guinea Bissau. In coordination with GIABA, who paid the rent and renovation of a privately owned office building, UNODC provided computers, a printer, fax, photocopying machine and a server as well as a generator, office furniture and stationary. Assurances were obtained from the Guinea Bissau Minister of Finance that should the CENTIF move to Government owned premises, which it hopefully will in a near future, all equipment and furniture will stay with the CENTIF. It was also confirmed that the CENTIF has been included in the country's State Budget for 2012. At the time this report was being finalized the State Budget had not yet formally been approved.

(iii) Eventually the project did not provide opportunities to develop guidelines or principles for domestic cooperation. However it should be acknowledged that all four countries already have legislation that sets out the main principles of such cooperation, e.g. in Criminal Procedure Laws or in the AML Laws. The training sessions provided ample opportunity to highlight the specific features of those laws and in particular how the interaction between law enforcement, FIU and judicial authorities has to be understood.

In conclusion, the project outputs contributed to enhancing capacity with the beneficiary agencies to more effectively combat the money laundering aspects of drug trafficking and organized crime. Extending the specialized training over several weeks in 2010 and having follow up missions in 2011 enabled agencies with a specific mandate in the field of countering money laundering and financial crime to more effectively incorporate the AML dimension in their investigations. Pools of expertise have been created, institutionalized and strengthened in all beneficiary countries. The use they are making of IT equipment has enabled them to process money laundering cases more effectively than before, and in some instances to create database tools. The use of such database tools will need to be

⁶ The IT equipment was purchased with DanOffice in Denmark and shipped to West Africa. UNODC has an LTA with DanOffice.

⁷ The Sierra Leone FIU reported that Bill was gazetted on 8 December 2011 and that it was being discussed by Parliament in First Reading on 19 December 2011.

⁸ Unlike in the other three countries, the Sierra Leone AML legislation provides for an obligation to report not only suspicious transaction reports, but also currency transaction reports, i.e. based on certain currency thresholds.

further expanded. The training that was provided will have to be further strengthened and extended to other beneficiaries, including with the judiciary before the project outputs and outcome will yield concrete results in the medium or long term. The low number of investigations, prosecutions and convictions for drug trafficking and related money laundering in most of the beneficiary countries suggests that there is still a long way to go.

2.6 Impact

Likewise, the impact of the project in terms of capacity building is not obvious to measure in the short term. The training 2010 training sessions targeted the following trainees:

(a) In Guinea Bissau: 18 trainees, representing the Public Prosecutor's Office (6), the Judicial Police (6) and the CENTIF (6);

(b) In Mali: 25 trainees, representing the CENTIF (6), various sections of the Judicial Police (8), the PEF (7), Gendarmerie (2) and Customs (2);

(c) In Senegal: 23 trainees, representing the CENTIF (4), various sections of the Judicial Police (14), Gendarmerie (3) and Customs (2). A specialized session for the CENTIF targeted four Board Members of the Unit as well as 11 staff members.

(d) In Sierra Leone: 26 trainees, representing the ACC (7), the National Drug Law Enforcement Agency (3), the Central Intelligence and Security Unit (2), the Joint Drug Interdiction Task Force (2), the FIU (2), the Sierra Leone Police/Criminal Investigations Department (10)

The beneficiary agencies were identified during the July 2009 onsite missions. The number of trainees per agency was determined by the Project coordinator, based on the needs assessments, whereas the nominations were done by the respective authorities. One should highlight that all trainees did have an operational background, working on analyzing, investigating or prosecuting drug trafficking or financial crime cases.

Written tests taken with all participants in the four countries both at the beginning and at the end of the 2010 training sessions showed significant improvement of their insight in the subject matters. Further, there is clear and positive feedback from the participants that this project brought something essential to the agencies working in law enforcement. The most important impact is the shift in the way people work. This relates to both the awareness of linking a predicate crime with its money laundering dimension as well as to the introduction and use of IT equipment in various agencies.

The latter has the potential to accelerate the process of investigations. In a number of instances, such as with the Economic and Financial Brigade of the Judicial Police in Bamako, those investigations and the unit's databases were previously handled manually on paper format. This resulted in delays and many practical difficulties when searching for data on individuals or companies. Now that the unit can process such information electronically this will provide immediate benefits for its investigators.

An important restriction to the impact of the equipment is that it requires adequate computer literacy with the users. Experiences in Guinea Bissau in particular suggested a very low level of experience with some participants on how to use a computer. The onsite mission did not reveal cases where computers would have been assigned to people that could not use them.

2.7 Sustainability

There are many factors that will determine the sustainability of the project on the longer term. Most of them are beyond the control of project implementation. The main acquis in this regard is the institutional framework which is embedded into the law. Project sustainability will rely on the first place on the continued existence of agencies like the Judicial Police, Customs, the Anti Corruption Agency (Sierra Leone), the PEF (Mali) and more recently the FIUs. In the case of Sierra Leone, the TOCU is established through an interagency MoU, which by its nature is not legally enforceable. There are no indications however against sustained commitment to implement this MoU.

Sustained political commitment to counter organized crime and money laundering is another factor. Still on Sierra Leone there are serious concerns regarding the country's FIU. This unit has a very weak institutional capacity to leverage the project implementation. Moreover it is understaffed. Efforts on this FIU will not yield results unless the unit's mandate gets expanded through the adoption of the draft AML/CFT Bill which has been pending for a number of years now.

Another example where enhanced political commitment will be crucial is the CENTIF Guinea Bissau. Provisions have been made to guarantee the unit's operability in the short and medium term. Due to the unavailability of Government owned premises the unit is currently housed in a privately owned house for which GIABA paid the initial rent. Anticipating the construction of a complex to house various ministries, the Government provided assurances that the CENTIF would soon move to a publicly owned building and that it would retain the use of all office equipment and furniture that was provided to the unit under the project. Also a CENTIF budget has been included in the proposed 2012 State Budget, though one can only urge the Guinea Bissau authorities to effectively provide the unit with its own budget. Upon completion of the present report, the State Budget had not yet been formally endorsed by the Guinea Bissau National Assembly.

The sustainability of the project will also benefit from continuity of staffing with the beneficiary agencies. This is a crucial factor for both their top management to keep focusing on AML as a strategic approach, and for the executing staff (analysts, investigators, etc...) in charge of implementing this approach and the acquired skills.

At the time of the evaluation mission only few of those individuals were reported to have moved on to other positions. The new Director of Judicial Police in Senegal was well aware of the vulnerabilities related to money laundering and the need to address them as part of their overall action.

Given that several agencies have a mandate on countering money laundering, those will need to cooperate by effectively sharing strategic and operational data. This requires not only a sound understanding of legal provisions that govern such cooperation, but most importantly commitment with the directors of those agencies to apply those provisions and its underlying principles. This is particularly true as regards the cooperation between law enforcement and FIU (where the FIUs are designed as 'administrative' units even though their action has the same purpose as that of law enforcement agencies), for the cooperation between law enforcement and the judiciary, and for cooperation among law enforcement agencies. Concerning the latter, Sierra Leone has proposed a concrete response through the establishment of an inter-agency TOCU. Also statistical data provided by the Senegal FIU, which include convictions for money laundering, indicate that the country has obtained concrete results through inter-agency cooperation, and that it is ahead on the other beneficiary countries. Similar considerations can be made concerning the issue of international cooperation.

A dimension that seems not to have been included in the project implementation though is the "train the trainer" concept. The overall level of expertise in the field of investigating money laundering with most of the agencies that benefitted from the project was rather low at the time implementation started. This was particularly true in Guinea Bissau and Sierra Leone, to a lesser extent in Mali and Senegal, and with the notable exception of the FIUs of the latter two countries. As a result, one could wonder whether the "train-the-trainer" approach would have been a realistic one. Yet efforts could have been made to involve representatives of training schools of the various law enforcement agencies, where

those exist. The July 2009 assessment missions provided opportunities to meet with representatives of training schools in Senegal and Mali.

Sustainability of the use of IT equipment is a challenging issue in the West African context, which is characterized by hot, dusty and humid environments as well as instable electricity networks. UPS machines have been purchased to protect computers and servers, though when arranging the training sessions their number has been limited to fit to two or three computers at a time. When dispatching the equipment to various agencies after the training the number of UPS was insufficient, which required beneficiaries to use existing ones or purchase new ones. Unfortunately some didn't, thus exposing the machines to fluctuations in voltage on the electricity networks. All computers were provided with anti-virus software, which was installed on all computes when they were initialized for purposes of the 2010 training sessions. The servers that are being used were also equipped with anti virus software. This being said the beneficiary agencies will have to take care of updating the software and bear related costs.

Although this was not actually captured under the project objectives, no particular actions seem to have been taken to remedy the low level of computer literacy identified with some of the beneficiary agencies, already highlighted above. This might have deserved some more attention in order to make the project outcomes more sustainable. This being said, the Evaluation onsite mission did not identify situations where beneficiaries of the IT equipment were insufficiently able to use them.

III. CONCLUSIONS

The project was one of the first technical assistance initiatives at the regional level to effectively address countering drug trafficking and related money laundering as foreseen in the ECOWAS Political Declaration and Action Plan in such a comprehensive way. The input provided to the countries through the project, both in terms of operational training and of equipment, has been substantial. Yet they should probably be regarded as the first building blocks for more effectively counter (drug related) money laundering. Overall progress will only be achieved and visible through higher numbers of investigations/prosecutions as well as seizures/confiscations of proceeds of crime. At present, only Senegal has achieved concrete results through convictions for money laundering. AML policies in Mali are likely to generate their first results soon.

Strategic focus of the project implementation was rightfully placed on a combination of specialized training and delivery of IT tools. Activities were delivered with due consideration to providing opportunities for stakeholders from various domestic agencies to get to know each other and also to understand more about the role and mandate of other agencies. Further emphasis will have to be put in particular on the development of database capacity with targeted agencies in each country.

Even though no concrete evidence of new or strengthened mechanisms to share information domestically or internationally could be found during the mission, there was positive feedback from participants in the 2010 training sessions that those involved representatives from various domestic agencies. Such positive feedback was particularly tangible in Sierra Leone, where a number of law enforcement agencies are enhancing coordination through their involvement in the TOCU. The dimension of regional cooperation does not seem to have been captured in the project activities, though it appears that the needs identified in the assessment missions required the project to focus primarily on strengthening capacity at domestic level.

New challenges and interventions will be required to capitalize on the results achieved under this project, in the beneficiary countries. Eventually it could be envisaged to transpose project activities to other West African countries domestic agencies to get to know each other and also to understand more about the role and mandate of other agencies. Further emphasis will have to be put in particular on the development of database capacity with targeted agencies in each country.

IV. RECOMMENDATIONS

4.1 Issues resolved during the evaluation

The evaluation took place after the implementing activities had been completed. No particular issues had to be resolved during the evaluation mission.

4.2 Actions recommended

One of the main achievements of the project is to have focused on tackling drug trafficking and organized crime through their money laundering component. Therefore regional and domestic policies, whether in the field of countering drugs or crime, should integrate anti money laundering as a key strategic priority. This could apply also to anti corruption efforts, conflict prevention, peace building and indeed development initiatives in general. Such policies require high level political commitment. Countries' key policy makers, regional bodies such as ECOWAS and technical assistance providers such as UNODC should be fully aware of the need to counter the financial crimes that inevitably derive from crime and conflict situations.

The low number of investigations, prosecutions and convictions for drug trafficking and related money laundering in most of the beneficiary countries suggests that countries will require further input in respect of training and use of IT tools before they will be able to tackle those complex forms of crime in an effective manner.

The institutionalization of pools of expertise in the field of AML should be encouraged. Laws or other regulating documents in all four beneficiary countries assign specific mandates to units such as the FIUs, the PEF (Mali) or TOCU (Sierra Leone). The project showed that such entities with a dedicated mandate have the potential to gradually build expertise in a very specialized field such as countering financial crimes or drug trafficking, thus increasing the potential for yielding concrete operational results in terms of investigations and prosecutions. Countries should not only consider creating such agencies but also clearly articulate the modalities of their cooperation with other domestic stakeholders. Specialized agencies should receive full political support when carrying out their assignment, but also be provided with sufficient and competent staff, with material resources such as office space and equipment as well as budget capacity. Where financial resources are lacking, countries should consider enhanced tools and capacity to effectively recover the proceeds of drug trafficking or money laundering, and use (part of) those proceeds to strengthen the capacity of their domestic agencies⁹.

Further capacity building in the field of countering financial crime, through sharing of practical and operational experiences, should be pursued. A particular dimension of such capacity building efforts could be to further promote South-South cooperation, i.e. with countries like Brazil or Malawi who are facing similar operational challenges as the ones existing in West Africa . This could also result in relying increasingly on expertise that is being developed in the sub-region. The latter will help mitigating the disparity in capacities that exist among ECOWAS Member States.

Also training would also be more sustainable if technical assistance providers would more actively associate domestic or regional training centers with project implementation. Those include police academies or training schools for other law enforcement agencies, as well as training infrastructures

⁹ The issue of asset recovery was not covered under the objectives/outcomes and outputs of the project.

for prosecutors and other representatives of judicial authorities. Reference could also be made to the regional training centers such as the ones existing in Nigeria (for Anglophone trainees) and Côte d'Ivoire (Grand Bassam – for Francophone trainees).

The establishment and management of databases should be further supported, with specific focus on basic database tools (eg. registers for individuals and companies) and on capacity building with those agencies that have a specialized mandate in countering money laundering. Anti-drug agencies should consider creating such databases at a centralized level to capture and maintain all relevant information, including on ongoing investigations and prosecutions. This will i.a. benefit the data analysis done by the FIU.

In order to provide IT equipment in a sustainable manner, project design and implementation could have made use of hiring an IT expert, or at least seeking comments and input on proposed purchases of items.

Enhancing computer literacy as a parameter for measuring and improving success of project implementation should be considered.

Overall project management and implementation would have benefitted from a more detailed description of objectives, outputs, indicators, coordination mechanisms between stakeholders etc from the outset. Although a substantive project revision was conducted in January 2011, much of this could have been remedied if the project document had undergone a comprehensive rewriting just after the July 2009 assessment missions.

V. LESSONS LEARNED

5.1. Lessons learned – operational issues

The vulnerabilities in respect of organized crime are high throughout the region. Yet, countries' capacity to tackle those phenomena is still weak because of a range of factors. Those include limited financial resources, lack of political commitment, exposure to corruption, etc.

Enhancing this capacity to countering predicate crimes through their money laundering component is a challenging and worthy objective as money laundering is closely linked to drug trafficking the progress made by the beneficiary countries, i.a. through the project, suggest that there is still a long way to go.

In addition to mitigating factors such as corruption and low level of resources and political commitment, analyzing/investigating money flows that could be related to predicate offences requires substantial changes in the way law enforcement conduct their work. First of all, it requires a change in strategic approach. So far the vast majority of investigations by law enforcement still are merely reactive. In many cases investigations result for instance from occasional interceptions of illicit drugs. Those drugs are seized and the couriers arrested, but the investigations do not go beyond those facts. Rather, a proactive and truly investigative dimension should be added to those cases, to try to uncover possible criminal networks, trafficking roots and indeed resulting money laundering. Thus the change in strategic approach also requires relevant agencies to incorporate the money laundering dimension into their operations aimed at countering drug trafficking or other forms of predicate crime. This still is a very innovative approach in the beneficiary countries.

Secondly in order to perform such proactive investigations or analyze financial flows countries need much stronger database capacity. Data collection, storage and management are crucial tools which are still missing in many instances. The access of relevant authorities to data such as official identification of individuals (register of individuals), information on real estate ownership, statutory information on companies including beneficial ownership, commercial registries, vehicle registries, etc. are all essential and basic tools which only exist to some extent in the beneficiary countries, primarily in Senegal and to a much lesser extent in the other countries. The existence of databases should be coupled with the requirements to access the data and to conduct searches in order to retrieve relevant information in a short period of time. The latter can only be achieved through enhanced focus on developing and strengthening IT tools. A substantial number of agencies in the beneficiary countries were and still are recording information on paper format, often without data being properly centralized among the sub units of decentralized entities. This seriously limits their accessibility and reliability. Moreover those paper records are very vulnerable to robbery or material deterioration through fire, humidity, poor quality of the paper used, etc.

A third issue is the prerequisite to establish, maintain and enhance mutual trust among agencies, at all levels, so as to promote effective exchange of data. FIUs have emerged as a new key player in the fight against money laundering. The AML laws in all four beneficiary countries assign a very central role to the FIU for purposes of analyzing STRs. This requires it to match financial data with information that could be available to public administrations or other law enforcement agencies for instance. The latter have to provide information to the FIU upon request though because of professional secrecy they would not be able to access the FIU data itself. This apparent absence of reciprocity has often obstructed cooperation between law enforcement and FIU, though such approach is short sighted. The FIU serves as a filter between reporting entities and the repressive agencies. When the FIU identifies, on the basis of data it could collect from various sources, that a file contains

sufficient indications of money laundering, it will promptly inform law enforcement or the judiciary. This results in only relevant FIU data being made available to law enforcement¹⁰.

5.2. Lessons learned – project preparation, design and implementation

Delivering technical assistance through an ambitious project such as the present one requires careful preparation, planning and design. It is understood that due to certain constraints the initial project document had to be produced under extremely tight pressure. This resulted in many essential components of the project to use imprecise wording, in particular with regard to project outputs and outcomes, which had to be articulated later on. Although this has to be mitigated by the coherent way in which the project was implemented, consideration could have been given to formally reviewing and editing the project document at an earlier stage. This could have been taken care of right after the assessment missions, or at least before the actual project implementation started.

The way training sessions brought together staff from various agencies was beneficial to the trainees who had the opportunity to thoroughly exchange experience and skills. Most importantly this benefits to mutual trust, which is a requirement for operational cooperation at domestic level. Moreover using IT equipment during the training provided a way for the beneficiaries to learn how to use innovative tools. Having the equipment delivered within a shorter timeframe after the training would have facilitated reproducing the learnings of those training sessions in their day to day working environment.

Finally the choice of Italian experts to deliver these trainings sessions has been highly appreciated by all the beneficiary countries who requested further cooperation with Italian Government.

This project and the way it was implemented will hopefully provide inspiration for West African States, with the support of UNODC and other international partners such as GIABA, in pursuing the goal of more effectively countering drug trafficking and resulting money laundering in this part of the African continent.

¹⁰ In the case of Guinea Bissau, Mali and Senegal the FIU disseminates information to the Prosecutor who forwards the case to an investigating judge. Through this dissemination law enforcement can access the FIU data.

ANNEX I. TERMS OF REFERENCE

for the Independent Evaluation of Project

XAW/U53 – Law Enforcement Capacity Building on Countering Drug Trafficking in Selected Countries in West Africa

1. BACKGROUND INFORMATION

The threat posed to the stability of West Africa by illicit drug trafficking is very real. The dramatic increase in seizures of Latin America drugs bound for Europe is evidence that West Africa is already a major hub for the illicit traffic. In 2009, 35 tons of cocaine left South America for West and Central Africa, of which some 13 tons were consumed locally, and 21 tons passed through the Region en route to Europe all in all worth 800 million US Dollars.¹¹ UNODC estimates that around 40 tons of cocaine consumed in Europe in 2007 was trafficked through West Africa, for a wholesale value (in West Africa) of about \$600 million, and a retail value (on the streets of Madrid, London or Rome) more than five times as much (\$3.2 billion).

As two recent UNODC reports state¹², the influx of such large sums of money undermines the democratic process and poses a real threat to the development and security of the sub-region, still struggling to emerge from decades of political instability and violent conflict.

West Africa has become a focal point of organised crime and illicit trafficking because it is vulnerable. National institutions in the sub-region are often under-resourced, weak and fragile, as West African states strive to emerge from violent conflict and long institutional crises. Such an environment provides opportune conditions for the infiltration of criminal organisations and the subsequent influx of large sums of cash, destabilising economies and tearing at the social and political fabric of West African societies.

The consequences of not addressing this issue are far reaching. In order to ensure that the sub-region does not fall victim to drug trafficking networks, national law enforcement agencies (including Financial Intelligence Units, Law Enforcement and Judicial authorities) need to be

¹¹ UNODC, Transatlantic Cocaine Market, April 2011

¹² UNODC, "Drug Trafficking as a Security Threat in West Africa", October 2008. UNODC, "Cocaine Trafficking in West Africa. The Threat to Stability and Development (with special reference to Guinea-Bissau)", December 2007.

provided with basic essential knowledge (“software”) and equipment (“hardware”). The introduction and promotion of inter-state regional coordination mechanisms are also critical for impeding the work of drug traffickers. Through the provision of law enforcement training related to drug trafficking and basic operational equipment, this project focuses on filling a critical gap needed to combat this threat, while helping secure the stability of the sub-region for greater development.

This project is a direct response to the main thematic priority of the ECOWAS Regional Response Plan of Action regarding “Effective law enforcement and national/regional cooperation against the high-level increase in illicit drug trafficking and organised crime” and complements other UNODC priority interventions ongoing and proposed for West Africa.

Conscious of the threat posed by drug trafficking and Transnational Organized Crime (TOC) to their internal stability and balanced development the Governments of Guinea Bissau¹³, Mali¹⁴ and Sierra Leone¹⁵ have all endorsed drug and crime national strategies and launched with the assistance of UNODC integrated programs. Hence the current project provided the training resources and know how already budgeted in the mentioned strategies and integrated programs.

The project was elaborated early 2009 with a view to build the capacity of law enforcement agencies of Guinea Bissau, Mali, Sierra Leone and Senegal in fighting drug trafficking and transnational organized crime. The Government of Italy donated a total of 1.288.878 USD to enable the West African countries to pursue that objective. As from the conception of this project, the Italian *Guardia di Finanza* (hereafter referred to as ‘GdF’), was chosen as the main implementing partner of UNODC. In November 2009, a Consultant was hired to be in charge of coordinating the implementation of project activities, together with the Project Coordinator. Project activities are being implemented

¹³ “*Plano de Emergencia de Combate ao Narcotrafico*”, 7 July 2007 and “Combating and Preventing Drug trafficking to and from Guinea Bissau – Promoting the Rule of law and Effective Administration of Justice 2007 – 2010”, 17 December, 2007, *Plano Operacional Nacional para o combate ao tráfico de drogas, crime organizado e abuso de drogas na Guiné-Bissau 2011-2014*, June 2011.

GNBU44 - Guinea-Bissau Anti-Trafficking (GIB AT) - Establishment of a Specialised Unit within the Judicial Police to Investigate and Combat Drug Trafficking and Organized Crime, (Maybe we can mention this project as synergy with XAWU53.instead of national strategy.)

¹⁴ *Rapport sur la Criminalité organisée et les trafiques illicites au Mali, Décembre 2008, Assistance à la mise en œuvre du Programme National Intégré de lutte contre les trafics illicites et la criminalité au Mali*, April 2009.

¹⁵ National Drug Control Act, July,2008; Memorandum of Understanding was drafted for the establishment of the Sierra Leone Joint Drug Interdiction Task Force (JDITF), August 2008, Building institutional capacity to respond to the threat posed by illicit drug trafficking and organized crime in Sierra Leone, April, 2009

since then and are expected to be concluded by mid October 2011, i.e. just before the evaluation can start. The project itself will be formally closed on 31 December 2011.

Based on the requests formulated by beneficiary countries and the findings of preliminary assessment missions conducted in July 2009 by a team of UNODC experts and specialized trainers from the GdF the focus of project was reoriented to address in particular the financial crimes component of drug trafficking and organised crime, i.e. money laundering.

The project was revised and extended until December 2011. The project objectives remained the same, though new implementing activities were added under the main outputs, which related to the provision of training and IT/Office equipment to competent authorities, such as Financial Intelligence Units, law enforcement agencies and the Judiciary. The extension also aims at providing sufficient time for the independent evaluation.

The overall objective of the project reads as follows: to build the capacity of law enforcement agencies to combat illicit drug trafficking to and from beneficiary states.

The following revised Outcome and Outputs should be evaluated:

Outcome:

The beneficiaries more effectively combat the money laundering aspects of drug trafficking and organized crime

Output 1.1:

National authorities possess the required knowledge and logistics to conduct their work

Output 1.2:

Beneficiary structures are assisted in their daily work and international relations

Performance Indicator: timely, quality technical assistance

2. PURPOSE OF THE EVALUATION

In compliance with the project document, the final project evaluation is undertaken by initiative of UNODC ROSEN, with the Project Coordinator being the evaluation manager, to measure its achieved results against planned outcomes and outputs.

In general, the overall purpose of the evaluation is to draw lessons from the project implementation, and to assess the impact of the implementing activities, and to make recommendations regarding best practices and highlight any deficiencies that could be the basis for instituting improvements to

new projects planning, design and management. Broader, it is expected that the evaluation will provide insight that will help UNODC increase the effectiveness and impact of its technical assistance in the interrelated fields of law enforcement, anti drugs and anti money laundering. As the project will be completed this year, evaluation is being undertaken during the last months of the project.

The main stakeholders of the evaluation are the domestic authorities that benefitted from project activities in each of the beneficiary countries, management of UNODC HQ and ROSEN, as well as project staff. All stakeholders will participate in the evaluation according to their roles in project implementation by submitting project related information to the evaluator (i.e. ROSEN and project staff), take part in interviews and other exercises undertaken during the evaluation. The draft evaluation report will be shared with relevant units of UNODC, Government counterparts and the donor country for feedback and comments. All stakeholders will be provided with a copy of the final report.

3. EVALUATION SCOPE

The evaluation will measure results of project implementation in all four countries participating in the project (Guinea Bissau, Mali, Senegal and Sierra Leone) over the period from July 2009 to December 2011 against the various outputs of the project (cf. above). The evaluation will assess the impact of the training sessions on countering financial crime and money laundering resulting i.a. from drug trafficking and of other training activities, of the delivery of IT and other equipment, and make recommendations regarding best practices and highlight any deficiencies.

The thematic coverage of the evaluation will focus on anti money laundering and countering financial crime resulting from predicate crimes such as drug trafficking and transnational organized crime.

The evaluation specifically will address the following quality criteria: project relevance and utility, impact, effectiveness, efficiency and sustainability, as well as lessons learned and best practices.

The following areas should be presented and evaluated in the evaluation report:

- priority area and comparative advantage of UNODC
- relevance and attainability of the project objectives
- results achieved
- relevance and utility of the results

- sustainability of results and benefits
- partnership and governance (efficiency of cooperation with national and international stakeholders)
- problems and constraints encountered during implementation.

In particular the specific areas of evaluation should cover the following:

Project relevance and utility

- to what extent is the project aligned with the policy strategies and needs of West African countries, of the partner country in particular, in respect of countering money laundering resulting from drug trafficking and organized crime
- to what extent is the project aligned with the policy strategies of UNODC, other United Nations Organizations and bilateral donors?
- Is does the project provide appropriate solutions to the problems it is intended to address?
- How does the project contribute to eliminate the root causes of money laundering related to drug trafficking and organized crime?
- Are the objectives of the project still relevant? Are money laundering and financial crimes related to drug trafficking and organized crime still a major problem in the beneficiary countries?
- What is the value added of the project in relation to other priority needs and efforts made to solve it (in particular efforts under other UNODC projects)?
- Is the project in line with the priority areas for technical cooperation identified by UNODC and does it make use of the Office's comparative advantage, in particular its field knowledge and expertise?

Impact

- what difference has the project made to beneficiaries?
- What are the intended or unintended positive and negative long-term effects on individuals and institutions?
- What are the micro- and macro-level long term economic, technical, environmental and other effects on individuals and institutions?

Effectiveness

- has the project achieved its objectives and results (outputs, outcomes, impact)? If not, has some progress been made towards their achievement?
- How has the project enabled domestic authorities to strengthen their capacity to counter money laundering and financial crimes resulting from drug trafficking and organized crime?
- What are the reasons for the achievement or non-achievement of the project objectives/outputs?
- To what extent is the progress made so far the result of the project rather than of external factors?
- What could have been done to make the project more effective?

Efficiency

- Has the budget been allocated and spent as planned? If not, for what reasons?
- Has the project delivered its outputs on time? If not, for what reasons?
- Has the staff been selected and recruited in a timely manner? If not, for what reasons?
- Compared with alternative approaches to accomplishing the same objectives, has progress been made at an acceptable cost?
- Could more have been achieved with the same input?
- Could the same have been achieved with less input? Would alternative approaches accomplish the same results at a lower cost?
- What measures have been taken during planning and implantation to ensure that resources were efficiently used?
- To what extent are the organizational structures of UNODC, the managerial support provided to the project, and the coordination mechanisms used by UNODC, both at Field and HQ level, supporting the project?

Sustainability

- To what extent will the benefits generated through the project be sustained after the end of donor funding?
- Have the beneficiaries taken ownership of the project objectives? Are they committed to continue working towards these objectives once the project has ended?
- Is their engagement to counter money laundering in particular likely to continue, to be scaled up, replicated or further institutionalized after the project ends?

Lessons learned and best practices

- what lessons can be learned from the project implementation in order to improve performance, results and effectiveness of UNODC project activities in the future?
- What best practices emerged from the project implementation?
- Can they realistically be replicated in the West Africa context?
- What lessons can be drawn from unintended results, if any?

4. EVALUATION METHODS

The evaluation will be conducted using the following methods:

- desk review of the project document, concept note, logframe, action plan, annual work plans, terms of reference for consultancies, official correspondence, reports of training sessions and project progress reports;
- interviews with key stakeholders and counterparts from the beneficiary countries, including domestic agencies, UNODC regional office in Dakar, relevant staff at UNODC Headquarters in Vienna; and
- observation during field visits.

The evaluator should provide a detailed description of the evaluation methods to be used prior to the field mission, and to summarize the review of documentation in an **Inception Report**. The latter should determine the exact focus and scope of the exercise, including the evaluation questions. The methodology will include, but not necessarily be limited to, those listed above. This step is needed because it enables the evaluation manager, project staff and the evaluator to check whether the evaluation is proceeding as desired and to discuss any previously unidentified challenges or limitations that may have emerged. The Inception Report should also be submitted to UNODC/Independent Evaluation Unit (IEU) prior to the field visits for consultation and clearance.

Judgments presented in the evaluation report should be supported by reference to the methods used for coming to a certain conclusion. In conducting the evaluation, the evaluator needs to take account of relevant international standards, including the UNODC / IEU Evaluation Policy and Guidelines and the United Nations Evaluation Group (UNEG) Norms and Standards.

Upon completion of the fact-finding and analysis phase, a draft evaluation report will be prepared. The draft should be circulated to the parties for comments. The evaluator will take the comments

into account and may choose to address them in producing the final report, for which he/she will be solely responsible.

The domestic stakeholders that should be met with during the field missions include, but are not limited to

- Guinea Bissau
 - o The Financial Intelligence Unit (CENTIF)
 - o The Judicial Police
 - o The Public Prosecutor's Office
 - o UNODC colleagues based in Bissau
- Mali
 - o The *Pôle économique et financier*
 - o The Financial Intelligence Unit (CENTIF)
 - o The Judicial Police
 - o The Coordinator of the National Integrated Programme on Countering drug Trafficking and Organised Crime in Mali
 - o UNODC colleagues based in Bamako
- Senegal
 - o The Judicial Police/Criminal Investigations Department
 - o The Financial Intelligence Unit (CENTIF)
 - o UNODC/ROSEN colleagues
- Sierra Leone
 - o The Transnational Organised Crime Unit (ROCU)
 - o The Financial Intelligence Unit (FIU)
 - o The Anti Corruption Commission
 - o UNIPSIL colleagues based in Freetown

5. EVALUATION TEAM COMPOSITION

The evaluation of the project will be carried out by an independent expert (international evaluator) appointed by UNODC. The donor to the project may provide an expert to participate in the evaluation as an observer.

Costs associated with the UNODC expert will be borne by the project. All costs for a donor appointed observer will be borne by the donor government directly.

The expert shall act independently in his individual capacity, and not as a representative of the government or organisation which appointed him/her. The independent expert should adhere to the independence and impartiality of the evaluation process discussed in the UNODC guiding principle for evaluation and have no previous experience or involvement with the project. This expert should have the following qualifications:

- experience in conducting independent evaluations (if possible within the UN system), i.e. experience in developing and applying both qualitative and quantitative evaluation methods, and technical competency in evaluation. Evaluator should have either a related university degree or substantive record of practical experiences ;
- familiarity with the substance matter, i.e. countering money laundering and financial crime, countering drug trafficking and organised crime;
- knowledge of the functioning of a Financial Intelligence Unit;
- excellent analytical, drafting and communication/writing skills in English;
- knowledge of French and/or Portuguese will be considered as an asset;
- field experience in West Africa or in developing countries in other parts of the world is an asset.

6. PLANNING AND IMPLEMENTATION ARRANGEMENTS

The essential project documents will be sent to the evaluator in advance to allow for preliminary familiarization with the project subject and preparation of the inception report.

The evaluator will be briefed on the project by the UNODC Integrated Programming Branch (IPB) / West and Central Africa Team when arriving at UNODC Headquarters in Vienna as well as by the Independent Evaluation Unit and by the Regional Project Coordinator upon his/her arrival into the region (via Dakar, Senegal).

UNODC Regional Project Coordinator and the project staff in countries will provide necessary substantive and administrative support during the evaluator's field visits.

Although the evaluator should be free to discuss all matters relevant to his/her assignment with the authorities concerned, he/she is not authorized to make any commitment on behalf of UNODC or the Government.

The evaluator will submit the evaluation report (in English) to the Project Coordinator, UNODC ROSEN. The report will contain the findings, conclusions and recommendations of the evaluator as well as a recording of the lessons learned. The draft evaluation report should be shared with UNODC ROSEN, as well as with the Chief of the Independent Evaluation Unit and IPB/West and Central Africa Team at UNODC HQ in Vienna for their review prior to its finalization. The evaluator, while considering the comments provided on the draft, would use his/her independent judgment in preparing the final report. IEU will serve to provide quality assurance throughout the process by providing comments on the evaluation tools, the draft report and will provide final clearance for the final evaluation report.

The final evaluation report should be submitted to UNODC within one week after receiving stakeholders' feedback to the draft report, and no later than 15 December 2011. The report should be no longer than 15 pages, excluding annexes and the executive summary. The report will be distributed by UNODC as required to the governmental authorities and to the donor.

The suggested timeframe for the evaluation mission: mid October to mid November 2011 (four weeks)

When (Tentative dates)	What tasks	Where (location)
Week of 17 October 2011 5 working days	Desk review and meeting with UNODC HQ/IPB and IEU	Home and Vienna, Austria
Week of 24 October 2011 4 working days	Meet with UNODC Rosen and domestic authorities in Senegal	Dakar, Senegal
27 October 2011 4 working days	Flight to Bamako – Start of field visit to Bamako, Mali	Bamako, Mali
2 November 2011 3 working days	Flight Bamako-Bissau via Dakar – start field mission to Bissau	Bissau, Guinea Bissau
6 November 2011 3 working days	Flight Bissau-Freetown via Dakar – start field mission to Freetown	Freetown, Sierra Leone
9 November 2011 3 working days	Flight back to Dakar – debriefing with ROSEN	Dakar, Senegal
11 November 2011 2 working day	Flight back home	home

14-18 November 2011 5 working days	Prepare draft report	home
21-25 November 2011 no consultancy fees for this period	Round of comments among relevant stakeholders	
28 November – 2 December 2011 5 working days	Finalization of the report and submission to UNODC	home
Total 34 working days		

Detailed budget

Item	AU	GB	ML	SN	SL	Total
Consultancy fees: 34 x 400 USD						13.600
DSA	4 x 322 = 1288	2 x 271 = 542	6 x 228 = 1368	(4 + 2 + 2) x 295 = 2360	3 x 174 = 522	6.080
terminals	14 x 39 = 546					546
Interpretation (tbd whether required)		?	?	?		
Local transportation	-	(cf UNODC)	(cf UNODC)	(cf UNODC)	3 x 100	300
GRAND TOTAL						20.526

Expected deliverables

- inception report (including a finalized design matrix)
- draft evaluation report
- summary of findings to be presented during debriefing meeting at ROSEN, Dakar
- Final Evaluation Report

NOTE : the UNODC standard format and guidelines for evaluation reports should also be attached to the terms of reference.

7. PAYMENT

Consultants will be issued consultancy contracts and paid in accordance with United Nations rules and procedures.

A lump-sum will be paid in three installments:

- A 75% advance for travel expenses (DSA and terminals) will be paid out before the start of the field visits. The remaining expenses will be paid out after the field mission on the basis of a duly completed F10 form.

- The consultancy fee will be paid out in two steps. A first payment of 50% of the fee will be made upon receipt of the draft report by UNODC (i.e. by the relevant units/sections at headquarters and field offices, as well as by the Independent Evaluation Unit). The remaining 50 % of the consultancy fee will be paid out after completion of the respective tasks and receipt of the final report and its clearance by the Independent Evaluation Unit.

8. PERFORMANCE INDICATORS

- timely and accurate submission of the documents;
- substantive and linguistic quality of the prepared documents;
- conformity of the project evaluation report with the standard format and guidelines for the preparation of project evaluation reports and technical guidance received;
- report should contain recommendations for future course of action.

ANNEX II. LIST OF PERSONS CONTACTED DURING THE EVALUATION

<u>VIENNA</u>	
UNODC IPB	Ms. Aisser Al-Hafed
UNODC IEU	Ms. Karen Cadondon
<u>SENEGAL</u>	
CENTIF	Mr. Ngouda Fall Kane; President FIU
UNODC	Mr. Ludovic D'Hoore; Project Coordinator Ms. Asma Sainkoudje-Broquet; Consultant
Judicial Police	Ms. Anna Semou Faye; Director Mr. Idrissa Cisse ; Director, Criminal Investigations Department Mr. Mamadou Thiandoum, former Director
Customs	Mr. Mokthar Doucoure; Director Mr. Djaga Soumare Mr. Samba Diop
Italian Embassy	Mr. Luca Parelli, Liaison Officer, Italian <i>Guardia di Finanza</i>
GIABA	Mr. Mu'azu Umaru
<u>GUINEA BISSAU</u>	
CENTIF	Dra. Teresa Antonia da Veiga, President of CENTIF
Judicial Police	Mr. Joao Biague, Director General Mr. Jose Luis Rodrigues Mr. Elmer Batica Ferreira
Public Prosecutor's Office	Mr. Edmundo Mendes
UNODC Office	Mr. Manuel Pereira, Project Coordinator Mr. Anriette Merle, Programme Assistant
<u>MALI</u>	
CENTIF	Mr. Modibo Sylla, President of CENTIF Mr. Boubacar Diarra, Member

Pôle économique et Financier	Cdt. Traore, Chief of investigation Mr. Oumar Sogouba, Public Prosecutor
National Integrated Programme	Mr. Moussa Kolon Coulibaly, Coordinator
UNODC	Mr. Matar Diop, Project Coordinator Ms. Hadiaratou Cisse, Programme assistant
Judicial Police	Mr. Modibo Diallo, Director Training Department
Gendarmerie	Mr. Sambou Diakité, Chef de Cabinet du Directeur Général de la Gendarmerie Nationale
Office Centrale des Stupéfiants	Mr. Moussa Zabout Maiga, Directeur OCS
Direction des Enquêtes Douanières	Mr. Mamadou Bah Mr. Ibrahim Ag
Italian <i>Guardia di Finanza</i>	Ltg. Giuseppe Pescuma
<u>SIERRA LEONE</u>	
Anti Corruption Commission	Mr. Nabillahi Musa Kamara, Director Ms. Nima Kamara, Staff member Ms. Maada Konneh, Staff member
Criminal Investigations Department	Mr. Alfred Karrow Kamara
Financial Intelligence Unit	Mr. Ahmed Mansaray, Member of the FIU Mr. Samuel Jabbie, Officer in Charge
Transnational Organized Crime Unit	Ms. Amara Sessay, Board Member
UNODC	Wassim Nassim, Procurement Officer
UNIPSIL	Janice McClean, Senior Police Adviser

ANNEX III. DESK REVIEW LIST

- Project Document, April 2009 ;
- Assessment Mission Report, Bissau, Guinea Bissau, 6-9 July 2009;
- Assessment Mission Report, Bamako, Mali, 13-16 July 2009;
- Assessment Mission Report, Freetown Sierra Leone, 18-21 July 2009;
- Mission Report by Italian *Guardia di Finanza*, Guinea Bissau, 1-9 February 2010;
- Mission Report by Italian *Guardia di Finanza*, Mali, 15 February -5 March 2010;
- Mission Report by Italian *Guardia di Finanza*, Sierra Leone, 22 February-12 March 2010;
- Mission Report by Italian *Guardia di Finanza*, Senegal 29 March- 2 April 2010;
- Interim Report April 2010;
- Project Revision document, January 2011;
- Report on Study Visit to the Brazil Financial Intelligence Unit, 24-28 January 2011;
- Report on Study Visit to the Malawi Financial Intelligence Unit, 28 February-4 March 2011;
- Report Expert Mission to Sierra Leone by Italian *Guardia di Finanza*, May-June 2011
- Mission Report on inauguration of CENTIF Bissau, Guinea Bissau 11-13 April 2011.

MATRIX OF FINDINGS

Findings :Problems and issues identified	Supporting evidences	Recommendations
1 West African countries remain vulnerable to drug trafficking and resulting money laundering	Weak law enforcement and corrupt judicial systems.	Operational action against drug trafficking or organized crime should integrate anti money laundering as a key strategic priority. Pursue AML efforts as a strategic priority.
2 Senegal and Mali are making more progress in respect of capacity building than Guinea Bissau and Sierra Leone	Senegal and Mali have better infrastructures and human capacity to support the implementation of laws.	Infrastructure and human capacity to support the implementation of laws need to be developed in particular in Guinea Bissau and Sierra Leone
3 The project substantially contributed to increased awareness with beneficiary agencies on the importance of countering money laundering, as a necessary corollary of drug trafficking and other forms of organized crime	Overall, coordination between investigating agencies and FIUs remains very weak, because of lack of technical expertise on countering financial crime and money laundering with the various agencies	Involvement of training schools, enhanced South-South, domestic and regional cooperation are needed to ensure greater appropriation of AML issues, as well as sustainability and long term impact of the training.
4 The training provided a unique opportunity to deepen mutual understanding among domestic stakeholders on the AML roles and responsibilities.	Various stakeholders shared experiences on the AML roles and responsibilities.	Further training and capacity building activities in the field of countering financial crime at domestic level
5 The initial project design was rather poor. This required a re-articulation of project objectives, outputs, outcomes and activities, thus adding to the delays in implementation.	The project objective and outcomes were difficult to measure in concrete terms, indicators were inadequate or could not be verified	Future project documents should be better reflected before being launched. Objectives and outcomes should be clear, realistic and measurable in concrete terms
6 Lack of efforts to build (basic) database tools and to enhance the use of those tools through stronger computer literacy.	Some of the equipment was not used, difficulty to verify the creation and population of new databases through the delivered IT equipment	This will require further strengthening of database capacity and computer literacy for stakeholders to use IT tools in a most effective manner

