External Evaluation
ACN Work Programme 2013-2015
(final)

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## Abbreviations

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<th>Description</th>
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<tr>
<td>ACN</td>
<td>Anti-Corruption Network for Eastern Europe and Central Asia</td>
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<tr>
<td>CSO</td>
<td>civil society organisation</td>
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<tr>
<td>DoJ</td>
<td>Department of Justice</td>
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<tr>
<td>EBRD</td>
<td>European Bank for Reconstruction and Development</td>
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<td>IAP</td>
<td>Istanbul Action Plan</td>
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<td>LEN</td>
<td>Law Enforcement Network</td>
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<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
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<tr>
<td>OSCE</td>
<td>Organization for Security and Co-operation in Europe</td>
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<tr>
<td>SIGMA</td>
<td>Support for Improvement in Governance and Management</td>
</tr>
<tr>
<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
</tr>
<tr>
<td>WB</td>
<td>The World Bank</td>
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Executive Summary

The present evaluation was commissioned by the ACN in summer 2014 to provide an external assessment of its Work Programme for 2013-2015, resulting in inputs to improve performance under the current Work Programme and in future activities. The evaluation assesses activities implemented between January 2013 and March 2015, although it also takes a longer backward perspective, as relevant and possible.

Background and Activities

The Anti-Corruption Network for Eastern Europe and Central Asia (ACN) is a regional anti-corruption outreach programme established under the OECD Working Group on Bribery in 1998. The Secretariat, located at the OECD Anti-Corruption Division, is guided by the ACN Steering Group composed of National Coordinators from ACN countries, as well as representatives from OECD countries, and international and non-governmental organisations.

Over the past decade, ACN activities have evolved to include the following core activities defined by the 2013-2015 Work Programme:

- Istanbul Anti-Corruption Action Plan (Third Round of monitoring);
- Cross-country thematic studies;
- Anti-Corruption Law-Enforcement Network.

Additional activities and more extensive projects are implemented on an ad hoc basis.

Findings

Relevance: All the activities considered under the current Work Programme are assessed to be highly relevant for ACN countries.

The Steering Group, composed of ACN National Coordinators and representatives from partner organisations, is the network’s governance mechanism and the organizing framework for ACN activities. It is also a platform for members to exchange good practices and information on anti-corruption reforms. Relevance of the Steering Group rests in the need to have such a forum. Nearly every profession establishes associations as peer exchange mechanisms, and it is also the case with anti-corruption practitioners. Its regional dimension adds value in gathering practitioners from similar national contexts facing similar challenges.

The Istanbul Action Plan Monitoring process relevance is established in a number of ways: in its external monitoring function, which enables countries to review progress on the fight against corruption; in its peer-review dimension that enhances contextual appropriateness and legitimacy of recommendations; in its uniqueness as a resource for Central Asian countries and Mongolia; in regularity and comprehensiveness of its reports, providing sustained attention on issues that require reform; and in flexibility of methodology that is regularly updated to respond to most important corruption challenges at present, and that can continue to evolve in the future. The monitoring reports also constitute a service to the broader anti-corruption/donor community in the region by providing actionable data to inform reform programmes and policy dialogue on anti-corruption.

Thematic Studies address knowledge gaps in the field of anti-corruption, which lacks guidance resources on numerous issues. They focus on themes that are of most interest to network members, but they serve as a resource to practitioners beyond the network and the region.
The Law Enforcement Network provides a standing platform on practical challenges faced by law-enforcement officials in their daily work. The emphasis on practical aspects, reinforced through case-study based seminars, is seen as a unique resource in strengthening the capacities of participants.

**Efficiency:** Efficiency in the use of network resources and the resulting synergies across activities is one of the most striking achievements of the ACN.

**Member contributions:** The network operates through activities in which all members can have a role. Their contributions include, at the most basic level, input into activities in the form of reviews and comments on various studies and other instruments. Many member countries, international organizations, ACN donors, as well as other OECD divisions also designate/second officials to serve as experts on the IAP monitoring teams or in various seminars, while some offer other forms of in-kind support for monitoring missions and network activities.

**Resources developed** for certain initiatives are routinely used for others, maximizing usefulness.

**Staff profiles:** In addition to being programme and project managers, ACN Secretariat staff are themselves experts who participate in monitoring missions, and provide advice on substantive issues to member countries. As Russian speakers, they have more efficient communication with national counterparts, which also results in significant savings in interpretation and translation costs.

**Administrative efficiency:** The number of staff compared to the volume of work of the ACN produces an impressive input/output ratio but capacities are rather stretched.

**Effectiveness:** Overall, the ACN is believed to have helped to build up a critical mass of national officials who have internalised international standards and good practices on anti-corruption policies and law-enforcement methods.

The IAP monitoring process has performed well in terms of outputs: monitoring reports are seen to be improving in quality partly due to recently-formalized national CSO inputs. Indeed, civil society participation in the IAP is far more extensive than in other monitoring mechanism operational in the region, and has been promoted through additional capacity-building actions under the current Work Programme. The outcomes are not tracked systematically, however, and are thus difficult to assess. Nevertheless, aggregate compliance rate with IAP recommendations stood at 30% at the end of the last Work Programme period (2012). Other unquantifiable outcomes include positively influencing the political will to implement anti-corruption reforms; provision of actionable findings around which national anti-corruption reform efforts can be coordinated, and which inform donor activities and policy discussions on anti-corruption. Ultimately, the IAP process helps countries comply with their international obligations under UNCAC and Council of Europe conventions.

Thematic Studies, while established as quality outputs, have few documented outcomes, although they have been identified as informing national policies on specialised anti-corruption institutions in Georgia and Ukraine, and asset declaration regimes in Croatia and Kyrgyzstan. The regional seminars organized in support of the studies (similarly to Law Enforcement Network seminars, below) are viewed as an important learning and exchange mechanism, essential in disseminating and internalising the information systematized in the studies. The published studies continue to serve as reference materials for practitioners and policy makers, including for organizations and anti-corruption practitioners beyond the ACN.

It is a strong impression among interviewed stakeholders that the Law Enforcement Network seminars have improved the country capacities for investigating and prosecuting corruption, and the peer-exchange dimension is reported to have facilitated direct law enforcement cooperation.
**Impact:** Establishing impact is difficult for all development or reform interventions due to attribution challenges, but in the case of anti-corruption efforts the problem is compounded by the multi-faceted quality of corruption and the many institutions/issue areas it encompasses, as well as a lack of regularly produced comparable data for each one. Aggregate indicators such as the TI CPI are entirely inappropriate for measuring impact of reform initiatives inter alia because they are too general and too comprehensive: they reflect perceptions (unreliable in themselves) on a number of unspecified corruption-related issue areas that may have no connection with the topics targeted by the reforms. Their connection with any one project or programme is far too tenuous.

Potential for impact has been identified in a number of specific issue-areas addressed by IAP reports and other outputs. For instance, IAP recommendations are seen to have influenced the implementation of key access to information provisions in Armenia, and improving transparency of the public sector in Georgia. Similar examples likely exist in other countries and fields, and it would be a mistake to assume that the lack of reporting indicates an absence of results. But expectations of results in the fight against corruption should be moderated: they are slow to materialize due to the complex nature of changes required, including changes in mindsets and political culture, as well as broader democratic transformation.

Other indications of potential impact include the following:

- IAP monitoring reports matter to countries, as evidenced in the intense debates over the content and phrasing of recommendations.
- Countries voluntarily join the ACN, submitting themselves to criticism and pressure to perform. This suggests that they recognize the benefits in the fight against corruption, and expect that the ACN will assist them in the effort.
- The monitoring experts’ extraordinary commitment to the process indicates that they believe that they are accomplishing something meaningful that is worth the effort.
- The ACN has attracted new donors and additional support for activities over the years, suggesting that they recognize that ACN is achieving some meaningful results.
- Related, Secretariat members are increasingly asked for input on shaping bilateral projects and policy messages, indicating that they recognize both the quality of expertise and the fact that the ACN is producing results.

Overall, this evaluation found a broad consensus among network members and other interviewed stakeholders that ACN monitoring reports, in particular, have an impact on national anti-corruption reform initiatives due to the profile and political clout of the OECD as the organization behind them.

**Sustainability:** The sustainability of the results across the ACN 2013-2015 Work Programme is quite promising. The initiative’s overall financial sustainability is not, however, as the ACN has only limited institutional budget through the OECD and no cost-recovery mechanism, although members do provide in-kind support for IAP monitoring and network seminars. While relationships with donors are quite constructive and there are many indicators that ACN work is appreciated, current funding sources are by no means guaranteed.

**Tracking results**

Overall, the tracking of results for ACN is rather poor, which is a disservice to a program that appears to be accomplishing a great deal. There are a number of simple ways that the ACN can improve on this, even by tracking results feedback in a simple results log, but a slightly more rigorous results framework is recommended to also sharpen the objectives of some activities.
Recommendations

- The ACN Secretariat is advised to attempt to track the results of its activities in a more systematic manner. A more systematic communication of identified results may help increase the peer pressure dimension of ACN’s work (as countries do not wish to see themselves outperformed), while highlighting ACN’s accomplishments may assist in fundraising.

- Consider developing a long-term fundraising strategy to ensure that ACN activities are, at a minimum, maintained at the present level.

- Consider increasing administrative support to ACN Secretariat. More rigorous tracking of results is one of the many small operational improvements that increase the administrative burden on an already-overstretched staff. Outsourcing the logistics for ACN events may also be considered in this connection.

- Consider the advantages and disadvantages of moving network meetings to another venue such as Istanbul, which is a travel hub for a number of ACN members. Such a move may reduce travel and accommodation costs, as well as the administrative burden on the Secretariat.

- Consider defining mandatory contributions for all network members across ACN activities, both substantive and material. The range of contributions that could be contemplated ranges from in-kind support for monitoring missions or other events to instituting membership fees.

- Consider the feasibility of restructuring Thematic Studies as tools to achieve specific objectives across ACN member countries. This would imply additional follow-up activities promoting the policy recommendations beyond what is currently in place and a greater financial investment, or alternatively treatment of fewer issue areas.

- Consider the advantages and disadvantages of highlighting the OECD dimension more extensively in ACN activities. For instance, IAP monitoring reports could be released with a great deal more “fanfare” which would undoubtedly increase (international) public attention and (international) public pressure on national authorities, potentially resulting in increased compliance with recommendations.
1. Introduction

The present evaluation was commissioned by the OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN) in summer 2014 to provide an external assessment of its Work Programme for 2013-2015.

The overall purpose of the evaluation is to promote learning and accountability by identifying the factors of success or failure, assessing the sustainability of results on output, outcome and impact levels, and drawing conclusions that may be used to improve performance under the current Work Programme and in future activities.

The evaluation assesses activities implemented between January 2013 and March 2015, although it also takes a longer backward perspective, as relevant and possible. It considers the governance structure and operating practices established by the ACN over the past decade as a context for the implementation of the current Work Programme. It covers all areas of the ACN Work Programme—including the Istanbul Action Plan, the Thematic Studies, the Law-Enforcement Network and the Steering Group—implemented in all ACN countries, and in cooperation with ACN partners such as international, civil society, business and donor organisations. The evaluation analyses the programme based on the OECD/DAC assessment criteria of relevance, effectiveness, efficiency, impact and sustainability.

1.1 Evaluation Methodology

The evaluation draws on three main sets of sources for its analysis. The first is documentary, consisting of a review of numerous ACN publications, project tools and reports, as well internal evaluations. The second set of inputs comes from interviews with a number of project stakeholders: network members, donors, partner organizations, representatives of national institutions and civil society, as well as ACN Secretariat staff and other relevant OECD officials, which took place in Paris in October 2014, during two field missions to Georgia and Tajikistan in November 2014, and via telephone. The final set of inputs consists of observation of ACN activities within the framework of a regional meeting (October 2014) and a country return mission to Tajikistan (November 2014).

The analysis takes stakeholder statements at face value, with the evaluator lacking the possibility to independently verify the soundness of some analyses, but the evaluation distinguishes opinions and perceptions from objective facts. Overall, the bulk of the stakeholder input into the findings is subjective, although every effort was made to verify impressions through multiple sources and triangulate information to the extent possible.

1.2 ACN Background and Activities

The Anti-Corruption Network for Eastern Europe and Central Asia (ACN) was established in 1998 as a regional forum for the promotion of anti-corruption reforms, exchange of information, elaboration of best practices and donor coordination. The ACN is a regional anti-corruption outreach

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1 The ACN is open for all countries in Eastern Europe and Central Asia, including Albania, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Former Yugoslav Republic of Macedonia, Georgia, Kazakhstan, Kyrgyzstan, Latvia, Lithuania, Moldova, Mongolia, Montenegro, Romania, Russia, Serbia, Slovenia, Tajikistan, Turkmenistan, Ukraine and Uzbekistan. OECD countries participate in the ACN as partners or donors. The ACN is open for participation by international organisations, such as the Council of Europe and its Group of States against Corruption (GRECO), the Organisation for Security and Cooperation in Europe (OSCE), the UN Office on Drugs and Crime (UNODC), and the UN Development
programme established under the OECD Working Group on Bribery. The Secretariat, located at the OECD Anti-Corruption Division, is guided by the ACN Steering Group composed of National Coordinators from ACN countries, as well as representatives from OECD countries, and international and non-governmental organisations.

Over the past decade, ACN activities have evolved to include the following:

- Istanbul Anti-Corruption Action Plan monitoring;
- Cross-country thematic studies;
- Anti-Corruption Law-Enforcement Network.

These core activities are defined by the 2013-2015 Work Programme that sets out specific quantitative and thematic objectives.

Additional activities and more extensive projects are implemented on an ad hoc basis, primarily at the request and with the financial support of donor partners. These range from capacity-development trainings for NGOs on shadow monitoring of the Istanbul Action Plan to more extensive national or sub-regional technical assistance projects such as the anti-corruption projects for Ukraine or Georgia, Ukraine, Armenia and Moldova (GUAM). Secretariat members also routinely engage in ad hoc outreach and advisory activities, for instance in workshops, conferences and consultations organized by national and international partners.

These additional activities fall into two main types of categories: those that are relatively “stand-alone” and those that amount to sub-projects of the basic Work Programme. National or (sub-) regional technical assistance projects would fall into the first category. Capacity development of NGOs to conduct shadow monitoring, on the other hand, amounts to a coherent sub-project of the Istanbul Action Plan even if it is not reflected in the Work Programme as such.

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2 The OECD Working Group on Bribery in International Business Transactions is made up of representatives from the Parties to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; for information about the Working Group, please refer to [www.oecd.org/daif/nocorruption](http://www.oecd.org/daif/nocorruption).
2. Main Findings

The following section presents the key findings based on the consulted sources, organized in five main sub-sections reflecting OECD/DAC evaluation criteria: relevance, efficiency, effectiveness, impact, and sustainability. Within each of these sub-sections, the distinct ACN activities are addressed at differing levels of detail, as appropriate for the subject matter, hence the internal structure of the sub-sections varies throughout the report.

2.1 Relevance

The first and overarching aspect of ACN relevance within the wide range of corruption and integrity issues it covers concerns its focus on domestic corruption, which is the most important challenge for the countries involved. In contrast to the Working Group on Bribery (WGB) with which it is formally affiliated and which addresses the supply side of foreign bribery, the ACN reaches out beyond the formal institutional mandate of the WGB in the narrow sense to genuinely meet its members' needs.

Within the broad category of domestic corruption, the range of countries represented in the network implies very different contexts, different levels of corruption, and different range of anti-corruption efforts. This, in turn, implies both specific national needs as well as common, regional ones. As will be discussed below in connection with each, the different ACN activities are relevant on both levels.

2.1.1 ACN Steering Group Activities

Within the 2013-2015 Work Programme log frame, the Steering Group is represented as a distinct “activity”. This is reasonable considering that the Steering Group is more than the network’s governance mechanism: it is also the organizing framework of the ACN overall.

The Steering Group consists of ACN National Coordinators and representatives from partner organisations and is an integral element of all ACN activities. As a decision-making mechanism, the Steering Group reviews the performance of programme activities, suggests changes (including new activities), and adopts the ACN Work Programme.

Its members also provide considerable substantive input into the content and scope of a number of specific ACN activities, for instance topics of interest for thematic studies or the IAP monitoring methodology.

Further, the Steering Group is the main platform for members to exchange good practices and information on anti-corruption reforms, and the basic structure around which network activities are organized. ACN outputs are substantively reviewed within this structure, although the exact composition expands or contracts on the basis of the activity involved. For instance, Istanbul Action Plan monitoring review meetings include additional participants like monitoring experts, country delegations, and NGOs, although the reports are adopted by Steering Group members alone. Reviews of Thematic Studies might include at a minimum those Steering Group members who serve in the thematic Advisory Group (although participation is often broader, based on interest the topic in question) and external experts. Special sessions on other activities, for instance on civil society monitoring of governments’ anti-corruption efforts, are also often organized in conjunction, enabling Steering Group members to participate if they so choose. Each of these meetings provides opportunities for exchange and peer-learning among network members.
A key aspect of relevance in connection with the meetings concerns the need to have such a forum. Nearly every profession establishes associations and organizes conferences where they can exchange information about challenges and good practices, and the ACN serves precisely such a purpose. Officials interviewed for this evaluation unanimously expressed appreciation for an opportunity to network with their colleagues, stating that the peer exchanges are a valuable source of information, inspiration, and resources for their work.

As a governance framework, the Steering Group provides a meaningful mechanism for network members to shape the direction of ACN activities, where inputs from countries are seriously considered and adopted by consensus, increasing members’ ownership of the process and providing it legitimacy, so that ACN activities are not seen as externally imposed. Decisions are made by members who are present at meetings, and although quorum is not strictly defined, the flexibility appears highly functional in terms of efficiency of decision-making. The absence of particular representatives has not emerged as a detriment to the ownership and legitimacy objectives.

2.1.2 Istanbul Action Plan Monitoring

Istanbul Action Plan monitoring is the core of the ACN work and highly relevant for the countries in question.

External monitoring: At the most basic level, monitoring of anti-corruption efforts is extremely valuable for countries to be able to take stock of their progress, stepping back from the everyday work and short-term objectives. Some countries have effective national-level monitoring processes to assess their efforts, but such mechanisms, as valuable as they can be, lack the more objective dimension of external evaluations that are based on international standards and good practices.

Peer review: The regional dimension of the process means that it is based on peer review of countries that are far more similar than different in their historical and political traditions, and above all the process of transition from socialism. In this respect, both the reviewers, the majority of whom are regional experts, and officials of countries under review have a common understanding of a variety of challenges stemming from similar political cultures and inherited bureaucratic traditions, and the difficulties inherent in reforming them. Istanbul Action Plan members also share a common language. This makes the monitoring process, and indeed all exchanges under the auspices of the ACN, much more relevant to the countries than if a similar exchange were conducted with, for instance, France, on one side, and Vietnam, on the other.

Unique resource for some members: Until recently, the IAP process stood as the only review process in place for the Central Asian member countries (also Mongolia, which joined recently) that are not members of GRECO, and hence not subject to GRECO monitoring. For those countries, there are further no other regional mechanisms such as those available under the African Union Anti-Corruption Convention or the Inter-American Anti-Corruption Convention. While in recent years, the UNCAC has launched a monitoring procedure of its own, this process is at present incomparable to either the ACN or GRECO in the level of scrutiny involved. For these countries, the IAP remains the only meaningful review.

The purpose of this assessment is not to compare IAP monitoring to other analogous efforts, but some comparison is inevitable, and inescapable as concerns questions of relevance and duplication.

Broad scope of assessments: In the early years of implementation, IAP duplication with GRECO was a concern, but this is no longer the case. Over the years the ACN efforts have developed a unique profile that offers assessments that are complementary to, but rather distinct from GRECO. ACN monitoring is more comprehensive in the range of issues covered than GRECO, which focuses on
distinct topics in each round. By contrast, the IAP methodology also revisits issues of concern raised in the previous rounds (in addition to new sets of questions), providing a continuous picture of the progress of overall reforms over time, examining the identified challenges as long as they remain unresolved, as well as identifying new issues as they emerge. The Third Round of monitoring, currently underway, is particularly concerned with implementation of anti-corruption measures, which provides a much-needed depth of reviews.

Regular updates: IAP monitoring rests an iterative overview process in place, and a “big picture” diagnostic assessment, which is not only reflected in the initial reports, but is updated regularly through progress reports. While these updates are based on self-reporting by countries under review and not verified through country visits, they nevertheless receive scrutiny from the responsible review team, are open to civil society comments, and are examined by ACN peers as part of monitoring review meetings.

Flexibility in methodology: While it based on existing international standards, the IAP monitoring process is not mandated to verify compliance with any one international convention, and therefore has the flexibility to apply standards that are not formalized in conventions or not formally binding in all participating IAP member states. This includes, for instance, Council of Europe standards on judicial independence or aspects of the OECD Anti-Bribery Convention, or good practices to promote the integrity of the civil service and reduce administrative barriers for businesses, among others. In effect, the IAP has a nearly inexhaustible range of corruption-related issues it can incorporate in its monitoring over time. For instance, there are considerations to include in the next (Fourth Round) of monitoring a review of specific vulnerable sectors (e.g. health, education, etc.), which is beyond the mandate of any other monitoring framework.

The monitoring methodology has undergone an impressive evolution, and not only in the content of the monitoring: the format of the process has also seen considerable change. The periodic updates have been instituted at the suggestion of the countries (countering concerns that the administrative burden of the ACN monitoring is excessive), and CSO input has been intensified and formalized far beyond either GRECO or the UNCAC efforts.

Overall, the ACN has demonstrated a striking ability to adapt and remain responsive to its members’ needs, remaining highly relevant after more than a decade. It also retains the potential to remain relevant in the future in targeting new issues beyond those formalized in international conventions.

Service to development/ investment/ anti-corruption reform community: An often-neglected aspect of relevance of the IAP monitoring process rests in providing a resource for a broader community of anti-corruption practitioners and donors. The reliable periodic snap shots of the current status of the fight against corruption and new or persistent challenges, the IAP reports are invaluable for donors and implementers at the project identification/design stage, as well as a general reference for comparative practices. The interviews conducted for this evaluation indicated that both donors and consultants working on TA projects in the region (the author of this report included) have found IAP monitoring reports to be a useful resource in country assessments or other research. Related, the broad scope of anti-corruption issues covered is also relevant as a policy dialogue tool where the “big picture” view is essential. At the same time, specific IAP recommendations have also been used donors and international organizations to shape their own policy messages (for instance by the IMF in connection with the establishment of a specialized investigative bureau in Ukraine).

Other aspects of the review process also provide a service to other international organizations and donors. In one case observed by the evaluator (Tajikistan), the ACN return visit to present the monitoring report to national authorities was also used to provide a briefing for other international partners active in the national donor coordination body on anti-corruption issues. As some of the
donors represented around the table did not engage on anti-corruption issues, the presentation of the report was their first briefing on the issue. In countries where there are not too many other international efforts, such outreach actions provide additional value. The situation is vastly different among member countries, of course, but the ACN approach is flexible enough to extend its reach where it is needed.

The IAP monitoring reports could have relevance beyond the development community in a manner that does not appear to be considered at present, for instance for academic and policy research, or as an information resource to business considering investing in a particular country. In-depth assessments such as the IAP reports provide far more extensive and specific information about corruption risks than the more widely known international indices (e.g. TI CPI).

2.1.3 Thematic studies

Anti-corruption is a relatively recent field with rather limited research and systematised knowledge resources to guide practitioners. ACN Thematic Studies seek to address precisely this knowledge gap by using a comparative methodological approach.

While in the past, there had been some criticism about a somewhat ad hoc approach and insufficient involvement of country experts, the ACN Secretariat has responded by selecting the themes among the common challenges identified through IAP monitoring in consultation with Steering Group members to better reflect the needs and interests of member countries. In addition, primary data is now collected through questionnaires to National Coordinators. In reflecting regional needs, the studies are relevant not only for the ACN members themselves, but also for other stakeholders—donors and implementers—working in the region and beyond.

Some thematic studies concern law enforcement themes and also support the work of the ACN Law Enforcement Network.

2.1.4 Law-enforcement network (LEN)

The Law-enforcement network (LEN) provides a standing platform on practical challenges faced by law-enforcement officials in their daily work. While there exist formal law-enforcement cooperation organisations (INTERPOL/EUROPOL), other (sub)regional networks (e.g. Western Balkan “neighbourhood”), and periodic (sub-)regional training initiatives within the framework of various donor initiatives, the ACN network seminars are assessed by stakeholders not to duplicate efforts but rather to provide a unique forum that offers sustained support for challenges in investigating and prosecuting corruption.

As noted earlier in this report, exchange among peers is essential in learning and improving skills. For law enforcement officials, contacts gained through such exchanges can also assist in carrying out investigations, helping speed up the bureaucratic process involved in information exchange in trans-border investigations. Investigators even in highly-resourced countries such as the US meet regularly in similar forums to exchange of information and techniques, and deem such meetings essential to their work.

An advantage of the ACN LEN approach rests to a considerable degree, in the already-mentioned similarity of contexts, where law enforcement officials meet with comparable institutional, capacity, and other challenges, and similar forms of corrupt practices. These interactions provide different and equally valuable lessons as interactions with officials from countries with more developed and more well-resourced law enforcement agencies. The former can often offer innovative solutions to practical challenges arising from their common, often limited environments. The latter also provide guidance on emerging issues in law enforcement and new approaches, and serve as an
“aspirational” model for how national services should further develop. Both aspects are appreciated by stakeholders.

The approach of the network seminars is also highly relevant for law enforcement officials. The workshops are based on case studies and in-depth discussions of specific topic, with the focus on practical approaches in resolving the challenges encountered in every day work.

The scope and theme for each workshop is decided on the basis of issues identified during the monitoring process (common challenges law enforcement officials) and feedback from LEN network members collected after each seminar. The analogous network under the Working Group on Bribery also provides input, as do national law enforcement training institutions that are members of the LEN Advisory Group. In this respect, the relevance of each seminar is (re-) considered on an ongoing basis. Some of the interlocutors interviewed for this evaluation suggested relevance can be further improved by identifying and working through even more case studies from the IAP countries as these better represent their daily challenges.

2.2 Efficiency

Efficiency in the use of network resources and the resulting synergies across activities is one of the most striking achievements of the ACN. The synergies are such that it is essentially impossible to discuss the various components in isolation.

2.2.1 Member contributions

One aspect of this efficiency lies in the fact that network operates through activities in which all members can have a role. Their contributions take a number of forms.

At a most basic level, country representatives provide input into all ACN activities. They comment on IAP monitoring questionnaires and drafts of Thematic Studies, where they also supply country examples; they participate in thematic seminars. It is through these processes that they internalize the information and good practices offered.

As Steering Group members, National Coordinators also review and comment on proposed work programmes, and help to conceive other network activities. They are resource people for soliciting national expertise and identifying participants for seminars and workshops.

Many member countries designate/second officials in addition to the National Coordinators to serve as experts on the IAP monitoring teams or in various seminars. International organizations (e.g. EBRD, UNODC, WB) and donors (e.g. US/DoJ) also routinely provide experts on this basis. Two long-term IAP Monitoring Review Meeting Chairs from Slovenia and Switzerland are most prominent examples of such contributions. Their long-term involvement and commitment to the process has earned them the profile of “leaders” in the activity and highly recognizable “faces” of the ACN, as much as the staff themselves.

The network additionally benefits from advice and expertise from other OECD divisions. For instance, SIGMA experts frequently serve on IAP monitoring teams.

It bears highlighting experts seconded to the ACN to take part in activities receive no fees (or hefty per diems that de facto serve as fees); only travel and sustenance costs are covered by the ACN. While the value of these inputs has not been quantified, it stands to be a significant contribution to operations.
Members also offer other kinds of in-kind support for monitoring missions and network activities, ranging from in-country logistical support for such events, to meeting premises and hosting the meetings/events altogether (and covering costs).

Other international partners such as the OSCE and UNDP have also been noted to provide similar support on numerous occasions, as noted, for instance, in the budget presentation in the 2009-2013 progress assessment.

### 2.2.2 Multiple use of materials

Resources developed for certain initiatives are routinely used for others. For example, the Thematic Study on Specialised Anti-Corruption Institutions, initially developed to support Ukraine, was subsequently updated and is used across the ACN (and beyond). Similarly, a training methodology, including the methodology for case study development, which was elaborated under GUAM project remains applied for all law-enforcement network seminars. Law enforcement-related Thematic Studies provide a reference and thereby further support for the law enforcement officials.

### 2.2.3 Staff profiles

In addition to being programme and project managers, ACN Secretariat staff are experts themselves. They participate in monitoring missions and in development of substantive materials. They regularly provide technical advice to member countries on draft laws and policy proposals, precluding the need for consultants and related expenses. In fact, due to the efficient resource mobilisation within the Secretariat and throughout the network, the engagement of external consultants in the ACN is quite limited overall, mostly for the development of Thematic Studies.

The fact that all Secretariat members are Russian speakers is likewise a tremendous asset that promotes efficiency. All IAP countries share this common language. Not only is this relevant for communication with the national counterparts, but there is also a pool of expertise with relevant language skills, promoting much better understanding between monitoring teams and the national counterparts. It also implies considerable savings in interpretation and translation costs, which have not been quantified.

### 2.2.4 Administrative efficiency

In terms of the input-output ratio, the whole of ACN activities are implemented by 4 managers supported by 1.5 assistants, which is rather modest in relation to the amount of work involved. The ACN Secretariat office space is also quite limited, although this appears to be a challenge for the whole of the OECD. The Secretariat finds innovative approaches to make due with limited resources, preferring to direct available funds toward activities rather than administration. However, it would not appear inappropriate or frivolous to secure additional assistance in this domain to relieve the stretched capacities.

### 2.3 Effectiveness

The ACN has served as an invaluable resource for in-country reformers in a variety of ways that are linked to specific ACN activities below. Overall, there appears to be a consensus that the efforts have

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3 In the period of 2009-2012, in-kind contributions from ACN countries were estimated to exceed EUR 250,000. Anti-corruption Reforms in Eastern Europe and Central Asia: Progress and Challenges, 2009-2013, pp. 194-195.
achieved considerable progress in developing the technical capacities—expertise—of network members, particularly the National Coordinators/Steering Group members who regularly take part in meetings and substantive reviews (of monitoring reports, Thematic Studies, etc.). A critical mass of these officials is believed to have internalised international standards and acquired the knowledge about effective anti-corruption policies and good practices, or law-enforcement methods.

### 2.3.1 IAP Monitoring

As concerns outputs, under the Work Programme 2013-2015 the IAP monitoring was foreseen to produce 10 reports of 9 AIP countries:

- 7 Third Round monitoring reports (Armenia, Azerbaijan, Georgia, Kazakhstan, Kyrgyzstan, Tajikistan and Ukraine);
- 1 joint Second and Third Round monitoring report (due to Uzbekistan’s recent accession to the IAP);
- 1 Review Report (Mongolia, which joined the ACN in 2014); and,
- 1 joint First, Second, and Third Round Monitoring Report (Mongolia).

The reports are on track to be delivered as planned.

Stakeholders interviewed for this evaluation rate the reports as being of very high quality overall, which is seen to have improved over the years. This assessment relates to the high quality of expertise engaged for monitoring team and the diligence of the process involved, both of which have been refined over time, for instance, with additional guidance for newly-recruited experts (e.g. “Practical Guide for Monitoring Experts”) and procedures that seek to maximise the efficiency of information exchange.

A recent amendment in the development of reports is the formal inclusion of civil society shadow monitoring reports in AIP monitoring process. Civil society representatives are also invited to review meetings, where they actively participate in the discussions of the monitoring report and progress reports along with national officials. Along with other independent information solicited from other bilateral and international organisations active on anti-corruption issues in countries, these multiple sources provide for more incisive assessments. Civil society shadow reports are not produced in all countries, however, due to national capacity constraints, but the numbers are growing thanks to capacity-development activities of the Secretariat. The CSO efforts amount to a project in itself, and include the development of NGO monitoring manual and in-country training seminars.

Another essential aspect of the quality of the report is attributable to the remarkable level of commitment to the task demonstrated by the experts involved. Monitoring missions involve long hours and often difficult travel conditions. The process of drafting and adopting the reports is gruelling, typically involving long and late hours of negotiation between the monitoring team and country delegations. The process is anything but formal, and while the reports and their recommendations are ultimately adopted in agreement with the countries being monitored, there is a surprising level of frankness about the detected shortcomings reflected nevertheless.

The buy-in of countries achieved through the process appears to positively influence the readiness to pursue reforms based on the recommendations. IAP monitoring reports receive attention from national authorities, and there is notable commitment to fulfilling the recommendations. Most countries integrate ACN recommendations into their national anti-corruption reform programmes/policies/ action-plans. Some, for instance, Kazakhstan and Tajikistan, have elaborated specific action plans and/or working groups to pursue these recommendations.
While integration of ACN recommendations into official national reform policies can be considered an outcome at the most basic level, the results achieved are more substantial.

Compliance with ACN recommendations is a more meaningful indicator of outcomes. Overall, the rate of fulfilment of recommendations (those “largely” or “partially” implemented) stood at 30%, as calculated at the end of the previous Work Programme (2012). While it is beyond the scope of the evaluation to analyze them in detail, the recommendations have contributed to achieving some important progress in promoting the integrity of the civil service, improving access to information (highlighted in Armenia and Georgia in particular), and strengthening judicial independence in Georgia, among other issues. Regrettably, the ACN Secretariat does not report on these achievements separately, hence many of the outcomes achieved through the monitoring process are not readily apparent.

The rate of compliance with ACN IAP recommendations, while easily quantifiable, is but one level of outcomes, however. More difficult to capture systematically (and not easily quantifiable) are other aspects specified by national stakeholders, as follows.

- A number of interlocutors indicated that the IAP monitoring reports have helped them garner both political and material support for pursuing particular reforms due to the prominent profile of the organisation behind it (OECD). International organizations’ recommendations (regrettably) tend to have more influence on public policy than the domestic actors, and in a number of IAP countries, the ACN reports are the main point of reference. In this respect, it appears quite clear that while the peer review aspect confers perhaps a higher level of legitimacy and validity to the report recommendations, it is nevertheless the status of the OECD that provides the incentive for compliance. The ACN Secretariat has sought to further strengthen this aspect by providing cover letters signed by the OECD Secretary General and sending the monitoring reports to the Prime Ministers of the countries concerned.

- That said, the peer pressure dimension should not be downplayed. The ACN Secretariat reports that adoption of new standards by some countries impacts the response of others. For instance, the introduction of criminal liability of legal persons by a few IAP members is felt to have created significant pressure for others to do the same.

- The longevity of the IAP process is also seen to contribute to effectiveness. It has raised the expectation that countries’ anti-corruption performance will be assessed rigorously and that the scrutiny is not passing.

- The inclusion of civil society organizations in the monitoring process coupled with their capacity building had helped promote civil society participation in national anti-corruption efforts more broadly by providing them with both the technical know-how and legitimacy as respected voices in anti-corruption debates.

- Contrary to international indices (e.g. Transparency International’s Corruption Perception Index, CPI), the IAP monitoring reports provide actionable diagnostic data and identify specific areas for intervention, and also provide a picture of progress over. They are therefore also used by other donors and implementers to shape policy dialogue with national partners, as well as to design or prioritize their own interventions and coordinate efforts. The Secretariat receives numerous requests from in-country international partners to participate in the shaping or implementing reform interventions based on monitoring recommendations. On at least one occasion (the return mission organized by the ACN to present report findings, which coincided with the evaluation visit; Tajikistan, November 2014), the ACN report was also used to facilitate donor coordination, where a presentation of the findings was also made to a
donor group working on anti-corruption issues. The ACN Secretariat reports outreach to other in-country international partners as a matter of routine.

- Ultimately, the IAP process helps countries comply with their international obligations under UNCAC and Council of Europe anti-corruption conventions. However, as noted in the section on relevance above, it promotes anti-corruption reforms beyond the standards enshrined in those instruments.

Finally, the entire process of IAP monitoring—from the selection of review topics and design of questionnaires, to the review and adoption of monitoring reports and continual review of updates—serves the network members to develop their own expertise. To paraphrase one interlocutor interviewed for this evaluation, ACN activities have led to a group of key officials who have internalised international standards and good practices, have developed a lot of knowledge, and have the capacity to significantly contribute to national AC efforts once the political conditions provide them with the opportunity for doing so.

### 2.3.2 Thematic studies

The 2013-2015 Work Programme foresaw the development of three Thematic Studies on the following topics:

- Prevention of corruption;
- Business integrity; and,
- Criminalisation of corruption (3 aspects: liability legal persons, foreign bribery, and mutual legal assistance).

The Thematic Studies were all in the process of development at the time of the present evaluation, and are expected to be completed during 2015 or early 2016. As they are works in progress, they cannot yet be assessed; however, it is possible to review the past Thematic Studies as a reference to the expected results.

Stakeholders interviewed for the present evaluation all expressed support for the Thematic Studies undertaken to date and assessed the outputs as being of high quality. They stated that the information therein has been useful in extending their knowledge base and serving as a reference, as needed. However, it was the various exchanges in the process of their development—reviews of drafts and regional events organised around the themes in question—that appear more relevant for achieving the outcome of internalizing the issues and knowledge. The final publication remains as a reference, providing a tool for extending and sustaining the results achieved.

As concerns the studies currently under development, it is reported that the drafts of studies on prevention of corruption and criminal liability of legal persons both received quite positive feedback of network members who were involved in their review.

As concerns outcomes in terms of applying this knowledge, the studies serve as a reference in a number of different contexts:

- Some studies serve as tools for IAP monitoring experts, who often refer to them as a technical interpretation of an international standard;

- The publication on the models of specialised anti-corruption institutions, updated in 2013, guided the reform of the anti-corruption institutions in Ukraine. The relevant October 2014 package of laws defined the establishment of a specialised bodies in line with the standards described in the publication. The same study, together with the specific IAP
recommendations to Georgia, was one of the main reference points in the process of reforming the legislation on the Prosecution Service of Georgia;

- The Thematic Study on asset declarations has helped to shape asset declaration systems in Central Asia and elsewhere, with Croatian and Kyrgyz national authorities reporting to the ACN Secretariat that the study was an important reference in reforming their respective national systems.

The Thematic Studies are reference resources, but in themselves insufficiently detailed to provide all the necessary guidance in designing and implementing actual reform measures. They serve to deepen the knowledge of network members on specific AC issues, but to achieve more results on the in-country level, there may need to be additional investments in both dissemination and other follow-up. For that, however, there would need to be far more resources invested.

Of course, ACN Thematic Studies being publicly available free of charge serve as a resource to non-network members as well. No data exists on the possible range of users of the materials, but there is some anecdotal evidence, including the experience of this evaluator, that they have been used as resource material to other researchers and implementers on other organizations’ reform initiatives. In that respect, some of the follow-up comes from other sources, as was the case with the OSCE work in Central Asia on asset declarations. Some of this work may not always take place in coordination with the ACN and thus remains untracked. Overall, to extend the reach of the Thematic Studies, follow up actions would need to be more extensive, more deliberate and more specific objectives would need to be defined.

### 2.3.3 Law-enforcement network

The law-enforcement seminars are reported to be of very high quality. The most valuable and possibly unique aspect of the outputs is reported to stem from the case-study approach: the processing of hypothetical cases based on existing current ones by participants divided into teams. The approach is reported to differ significantly from many other analogous training events. Other factors that are reported to influence the quality of the training events is a careful pre-selection of the participants by the ACN Secretariat: invitations to national authorities include criteria for the profile of participants (primarily officials that work on actual cases, rather than managerial posts, officials responsible for international cooperation, or other anti-corruption specialists with no investigation or prosecution functions) and request nominees CVs to verify that the target profile is indeed achieved. This is not a routine practice of many other organizations. The final key aspect of achieving quality is the format of the workshop itself which does not consist of lecturers and an audience: all participants have equal roles to play, creating a true peer-exchange. The time format has also been refined over the years based on participant feedback, reducing the number of topics covered and devoting more time to each topic (case) thus allowing thorough analysis. The ACN is able to draw on the expertise of the Working Group on Bribery and a number of network law-enforcement (training) institutions to identify issues, cases, and experts.

As concerns outcomes, participants have reported an enormous value in such a practical focus, which provides officials an opportunity to apply diverse investigative approaches and prosecutorial strategies. It is "learning-by-doing" approach, even if it is a simulation. While the feedback is not systematic, the interviewed stakeholders—participants and presenters alike—expressed a firm conviction that the seminars have improved the country capacities for investigating and prosecuting corruption. Participation is said to be particularly important for junior officials who lack the experience and do not have access to many other forms of training. There is no systematic tracking of this feedback, however.
The meetings of law enforcement officials have additional outcomes, consistent with findings reported for the ACN network in general. The professional relationships arising from the meetings are reported to facilitate information exchange more broadly. Officials are reported to contact one another for advice on particular cases whether of national or trans-national character. For the latter, the relationships are said to have facilitated direct law enforcement cooperation, where information from other countries (e.g. on beneficial owners or natural persons coming from other ACN countries) is obtained in the early stages of investigations, before formal mutual legal assistance requests are filed. Such exchanges help investigators obtain preliminary information on whether a particular line of inquiry is promising and hence worth pursuing formally, and are not easily initiated unless the investigator personally knows the colleague on the other side. Officials also assist each other in formulating mutual legal assistance requests, speeding up the bureaucratic procedures that can significantly delay investigations (e.g. if the form is incorrectly filled, if not all relevant data is included, etc.)

2.4 Impact

Establishing the impact of any reform (or broader development intervention) is a well-recognized challenge at a minimum due to the difficulty in establishing attribution as one moves along the results chain. With anti-corruption efforts, however, the challenge is compounded by (at least) two factors: the multi-faceted character of corruption and the lack of relevant data.

Briefly, the difficulty with complexity of the notion of corruption is that it concerns a multitude of sectors and practices across the public and private spheres. In the context of attempting to establish impact of any anti-corruption initiative, one would need to consider effects in the fields addressed by that initiative, rather than "corruption" more globally. For the ACN, this would mean attempting to define and assess impact on each issue area it addresses, from access to information, to public procurement, to integrity of public officials, to civil service reform, to law enforcement effectiveness, to enumerate but a few. To do this systematically across all member countries, or even the nine IAP countries, is impractical to say the least.

The problem of data insufficiency relates to the first challenge insofar as the well-known global indices like the TI Corruption Perception Index (CPI) and the World Bank Control of Corruption Indicators are aggregate measurements that combine inputs—mostly perceptions—on a range of corruption-related issue areas, which cannot be disaggregated. Their connection with any one project or programme is far too tenuous. At the same time, there are no alternatives: data on distinct anti-corruption issue areas is either not produced, not produced regularly enough, or not produced for all countries according to the same methodology.

With this in mind, the only reasonable option would be to attempt to track change in specific issue areas in an anecdotal manner. The ACN Secretariat does so, although unsystematically, and much of the information that is tracked relates to outcomes rather than impact. For instance, the adoption of IAP recommendations reflected in legislative amendments is an outcome. Even the start of the implementation of these legislative amendments is an outcome, although if implemented effectively, it begins to suggest impact. Evidence of change in performance is what is needed to demonstrate impact, however.

One example of an issue area with evidence to suggest potential for impact is access to information. In Armenia, NGOs have reported to the ACN that officials responsible for public information requests have been finally appointed in public institutions as prescribed by law. The NGOs in question attribute the implementation of the provision directly to ACN highlighting the issue in its monitoring report, and seem rather optimistic that this policy change opens real prospects for improved
transparency in the public sector. In Georgia, what is assessed as an improvement in transparency in quite concrete terms is attributable in part to ACN recommendations in this field.

It is very likely that more examples such as these could be identified, and it would be a mistake to assume that the lack of reporting means an absence of results. But expectations of results in the fight against corruption should be moderated: they are slow to materialize due to the complex nature of changes required, including changes in mindsets and political culture, as well as broader democratic transformation.

A final set of observations is raised for consideration as proxy indicators of potential impact, as follows:

- IAP monitoring reports matter to countries. The debates over the content and phrasing of recommendations would not be as long and intense as they are if they did not create expectations and pressure in connection with implementation.

- Countries have voluntarily joined the ACN, with Central Asian republics as more recent newcomers and Mongolia the latest. They submit themselves to evaluation and criticism, and continuing pressure to perform. This suggests that they recognize the benefits of showing results in the fight against corruption, and expect that the ACN will assist them in doing so.

- The IAP monitoring and review experts' already-noted extraordinary yet unremunerated commitment to the process indicates that they believe that they are accomplishing something meaningful that is worth the effort.

- The ACN has attracted new donors and additional support for activities over the years, suggesting that they recognize that ACN is achieving some meaningful results.

- Related, Secretariat members are increasingly asked for input on shaping bilateral projects and policy messages, indicating a recognition of both the quality of expertise and the fact that the ACN is producing results.

Overall, this evaluation found a broad consensus among network members and other interviewed stakeholders that ACN monitoring reports, in particular, have an impact on national anti-corruption reform initiatives due to the profile of the OECD as the organization behind the reports, which holds considerable political clout. Quite simply, countries want to receive favourable assessments from prominent international organizations. It is an aspect that could be further strengthened, as the ACN does not appear to capitalize on this asset to the extent that it may be possible.

2.5 Sustainability

2.5.1 Outputs and results

The sustainability of the results across the ACN 2013-2015 Work Programme is quite promising.

The issues raised by the IAP monitoring reports are in the public domain and issues requiring attention (unaddressed recommendations) will continue to be scrutinized both by national civil society organizations and international/donor organizations. The responsibility will remain with national governments to demonstrate that the identified challenge has been effectively met. The reports will continue to provide a basis for engaging in dialogue on these issues.
The sustainability of outcomes of law enforcement seminars is enhanced through the production of relevant Thematic Studies, and through the involvement of national training institutions.

The knowledge base developed through the ACN more broadly is sustained in part through the publication of Thematic Studies, and the expertise developed and internalised by officials who have participated in network activities will remain a resource for the broader anti-corruption community even if they move from their present positions.

Sustainability is enhanced overall due to the longevity of ACN activities, and the thoughtful incremental expansion and refinement of activities. More than a decade of investments in the knowledge base (most broadly speaking) of all participants in the various ACN activities has resulted in an internalization of standards and performance expectations to an extent that no short-term program could ever hope to achieve.

2.5.2 Financial sustainability

By contrast to the rather optimistic assessment of the sustainability of results, above, ACN’s financial sustainability is not assured. The number of contributors has increased, and some support has arrived unsolicited (e.g. Lichtenstein), but the ACN has only very limited independent source of revenue: the OECD contributes only one managerial staff position and half an administrative one. Nor are cost-recovery mechanisms sufficient: ACN member states do contribute, but it is in-kind support—an off-setting of costs rather than income.

ACN Secretariat’s relationship with donors is exemplary: it is a true partnership, with the latter providing considerable and meaningful input into shaping network activities. Donors are also increasingly requesting and supporting additional national projects, the latest one being in Ukraine.

These are all rather positive indicators of ACN quality, but they do not guarantee continued funding, however. A reduction of activities reflecting any cuts in funding would be a pity considering the important work being done and all the challenges that remain. The ACN should consider bolstering its fundraising efforts, based on a more rigorous demonstration of its results in order to secure continued operations.

2.6 Tracking results

As this evaluation has repeatedly noted a lack of evidence to demonstrate the results of ACN efforts, some consideration of this issue appears warranted.

There currently exists a log frame developed for the ACN Work Programme 2013-2015. It was developed at the request of one of the donors, and it is not routinely used. It is a simple framework that defines activities, outputs, outcomes and impact for each of the four main activities defined under the Work Programme, as well as those for the Programme overall.

Not all indicators are equally robust, and there is some confusion between outputs, outcomes, and impact. The log frame has not served as a useful tool for the Secretariat, in part perhaps, because it has not identified the right indicators to track results. For instance, the outcome indicator for the IAP monitoring component is “peer pressure to implement reforms” (something unmeasurable) rather than compliance with recommendations, which is easily measurable and more meaningful.

While over-formalization is not advised, it does appear that a more rigorous results framework would assist the Secretariat in better tracking and reporting on results. It may be particularly useful
in connection with the Thematic Studies, where the very process of thinking through the indicators one step beyond what is currently there would help to better define what they really wish to accomplish through them.

The process of tracking results, rather than (only) being a burden, may also have potential benefits. For the IAP monitoring process, the Secretariat would need to solicit the assistance of member countries. It is possible that countries produce and collect some performance in context of other initiatives (e.g. bilateral projects), and it is quite likely that some relevant data is already reported to the ACN to demonstrate the fulfilment of recommendations.

Evidence of impact, by contrast, would likely require data beyond what countries provide for the purposes of the monitoring reports: it would involve actual performance assessments of newly-implemented measures. Moving in this direction would be a challenge for countries, no doubt, but developing such monitoring and evaluation methodologies would be an asset in the long term, and would assist them in better communicating their own achievements internally and internationally.

The suggestion here is not for an immediate major investment that would exceed current administrative capacities, but rather for a gradual elaboration of a data collection system in coordination with a few national counterparts who have an interest in developing capacities in this area.

The warning against over-formalization is not a mere formality (pun intended). Too narrow emphasis on reporting on (or quantifying) outputs and outcomes risks a number of unintended negative consequences:

- It begins to represent a considerable administrative burden.
- It can lead to a more mechanistic implementation of activities to reach output targets, as opposed to the current thoughtful design of each activity.
- It can create the perverse incentive of setting easily achievable (and ‘reportable’) objectives rather than the truly meaningful difficult ones, as the ACN does at present.
3. Lessons learned

- The ACN accomplishes a great deal and its stakeholders are highly positive about its results. However, there are few specific examples. This is to be expected outside of the Secretariat and its closest associates: ACN members are unlikely to recall particular benefits or achievements, especially in hindsight. However, the Secretariat itself should do more systematically track achievements to demonstrate the effects of their work. The log frame developed for the 2013-2015 Work Programme is not a useful tool in this respect. While over-formalization might be counterproductive, a slightly more rigorous results framework could be quite helpful.

- It appears more challenging to demonstrate results for some Work Programme components, like the Thematic Studies. At present, it is unclear whether this is due to insufficient dissemination, or insufficient follow-up (outreach, training). It may be useful to reconsider the objectives of these studies, as well as whether there is a depth vs. breadth trade-off to be made.

- Some network members contribute a great deal to the various activities, while others less. Those who contribute less arguably benefit less, since it is the participatory aspect that actually promotes learning. The law-enforcement seminars have devised an effective model to promote the active role of all participants. While other network activities do not operate in the same manner, perhaps some consideration can be given to approaches that might achieve a similar level of participation for all members.

- Related, some stakeholders have raised a question of whether member countries might be requested to make contributions to the network activities as an expression of commitment to the ACN and to promote its financial sustainability. There are many forms this could take, from annual fees to in-kind contributions (which are already made on a voluntary basis). There are at least two regional networks in the Western Balkans that collect membership fees, and while this model may not be practicable for the ACN, some sort of mandatory contribution may be appropriate.

- The organisation of network meetings in Paris places a considerable demand on Secretariat time and network resources. It may be possible to streamline the personnel involvement by outsourcing the event organisation to an external contractor. It has been further suggested that cost savings might be streamlined if meetings were organized elsewhere (for instance in Istanbul), which is already a travel hub for many of the network members, and where many associated costs may be significantly lower.

- The ACN does not appear to capitalise on its institutional affiliation to the extent that it might be possible, yet the OECD profile is one of its most important assets to influence the adoption of monitoring recommendations and the political will to fight corruption more generally. More could be done to promote the ACN/OECD link and the ACN "brand".
4. Recommendations

- The ACN Secretariat is advised to attempt to track the results of its activities in a more systematic manner. Evaluation mechanisms that have been put in place recently to solicit feedback from stakeholders may be one avenue to probe about in-country outcomes and the impact of ACN investments, but unsolicited comments should be tracked as well, at a minimum in a country/issue area indexed log. Statistical analyses may be possible beyond the aggregate compliance rate on IAP recommendations, for instance analysing compliance across countries on specific issue areas (which may translate into input on Thematic Study topics). Much information about anti-corruption outcomes is probably already provided to the Secretariat as justification for fulfilment of recommendations, and these could be tracked as outcomes in a more structured manner. In this connection, the log frame may be developed more rigorously to help identify the type of data needed. A more systematic communication of identified results may help increase the peer pressure dimension of ACN’s work (as countries do not wish to see themselves outperformed), while highlighting ACN’s accomplishments may assist in fundraising.

- Consider developing a long-term fundraising strategy to ensure that ACN activities are, at a minimum, maintained at the present level.

- Consider increasing administrative support to ACN Secretariat. More rigorous tracking of results is one of the many small operational improvements that increase the administrative burden on an already-overstretched staff. Outsourcing the logistics for ACN events may also be considered in this connection.

- Consider the advantages and disadvantages of moving network meetings to another venue such as Istanbul, which is a travel hub for a number of ACN members. Such a move may reduce travel and accommodation costs, as well as the administrative burden on the Secretariat (including, for instance, the burden of Schengen visa arrangements), provided it is possible to identify a reliable partner to whom to outsource the logistics.

- Consider defining mandatory contributions for all network members across ACN activities, both substantive and material. The range of contributions that could be contemplated includes expanding those already provided on a voluntary basis by some members (e.g. in-kind support for monitoring missions or other events, provision of experts, contributions to Thematic Studies), requiring more extensive participation in events (Steering Committee meetings), or even instituting membership fees. Higher expectations are often met with improved performance.

- Consider the feasibility of restructuring Thematic Studies as tools to achieve specific objectives across ACN member countries. This would imply additional follow-up activities promoting the policy recommendations beyond what is currently offered and a greater financial investment, or alternatively treatment of fewer issue areas. While it is not recommended that the ACN attempt to transform into an implementing agency, there appear to be additional opportunities for focused follow-up with other in-country partners and regionally to bolster outcomes.

- Consider the advantages and disadvantages of highlighting the OECD dimension more extensively in ACN activities. For instance, IAP monitoring reports could be released with a great deal more “fanfare” which would undoubtedly increase (international) public attention and (international) public pressure on national authorities, potentially resulting in increased compliance with recommendations.

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