

EXTERNAL REVIEW

OF THE
WORLD BANK/UNODC
STOLEN ASSET RECOVERY INITIATIVE

COMBINED REPORT OF THE PANEL OF
EXPERTS AND LEAD EVALUATOR

PANEL OF EXPERTS

MARY BUTLER
JUANITA OLAYA
JASON SHARMAN

LEAD EVALUATOR

ROGER MIRANDA

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Table of Contents

Executive Summary	2
Introduction	5
Strategic Relevance.....	7
Effectiveness	8
Sustainability.....	13
Partnership.....	14
Monitoring & Evaluation.....	21
Annex 1: Methodology.....	25
Annex 2: List of Persons Interviewed.....	26
Annex 3: Country Engagement Aggregate Data.....	29

EXECUTIVE SUMMARY

This external review was conducted at the request of the StAR Initiative's Management Committee to inform decisions regarding its strategic direction and implementation arrangements. The review was conducted by an external panel of experts and a lead evaluator. Please see a summary of the review's key findings below, along with recommendations. Evidence and analysis behind these can be found in the body of the report.

Strategic Relevance

Finding 1: StAR's asset recovery mission is and will remain relevant in a world of evolving technologies, document dumps, and increased global attention to corruption.

Recommendation 1: The MC should extend StAR for a term of ten years. The MC should secure sufficient and sustainable levels of funding to ensure implementation of StAR's work and support the Secretariat's fundraising efforts. A mid-point evaluation should be carried out in order to assess progress.

Finding 2: StAR's comparative advantages are its global platform, credibility, convening power and technical expertise. These strengths are applied through its three areas of work (Policy Influence & Partnerships, Country Engagement and Knowledge & Innovation), though more focus could be channelled toward the global problem of safe havens for stolen assets, which is a core element of StAR's original mission but has not been sufficiently prioritized in recent years.

Recommendation 2: Given StAR's mission, reach and stature - and that no other organization has taken up this mantle - it should redouble its efforts on building global momentum to deny havens for stolen assets. StAR should revise its strategy accordingly, modifying its approach and operational model as appropriate.

Effectiveness

Finding 3: StAR services and products are considered to be valuable and useful by direct beneficiaries and other stakeholders. StAR sets itself apart through informative and accessible knowledge products, effective policy influence, and, especially for certain countries, a unique ability to intermediate countries on both sides of an asset recovery case. Some other groups provide similar capacity-building activities and facilitate inter-country communications (e.g. ICAR, and the law enforcement and development arms of various countries), but StAR's knowledge products and its unique ability to broker between countries or draw on the convening power of the World Bank and UNODC to organize country-specific or multi-jurisdictional 'asset recovery forums' are generally not duplicated by any other institution.

Recommendation 3: To the extent a balance must be struck between country engagements and knowledge products on an on-going basis, we recommend that more emphasis be placed on knowledge products, which StAR is uniquely qualified to develop. Such products tend to complement the assistance needed by countries seeking StAR support.

Finding 4: StAR has made important strides in disseminating information on its activities and results to partners, policymakers and practitioners. The introduction of "The StAR Quarterly" newsletter, a rise in Twitter activity, plus informal briefings to donors and more succinct annual reports have increased and maintained stakeholder engagement. However, the lack of a guiding communication strategy and the level of effort required to maintain momentum misses important opportunities to leverage influence and share knowledge, and taxes StAR's already stretched resources.

Recommendation 4: The MC should define, with the support of the Secretariat, a communications strategy that may be implemented with some autonomy by StAR- granting it some flexibility. Such a strategy would define targets and a strategic purpose aligned to its mission. To ensure sufficient implementation, resource allocation will need to be deliberate. If the World Bank's internal processes don't allow for deployment of a strategic, independent, and flexible communications plan, perhaps UNODC procedures may; if not, the expectations of StAR's effectiveness should be lowered and reconsidered accordingly for the next period of review.

Partnership

Finding 5: The StAR partnership between UNODC and the World Bank provides the basis for an efficient means to achieve desired outcomes for asset recovery, though there is room for improvement. The MC members interviewed voiced strong support for StAR's work. The operational latitude given by the Management Committee (MC) to the Secretariat allows flexibility and responsiveness, though more strategic support and guidance from the MC would be useful. Challenges appear to be largely bureaucratic, and often result in delayed implementation of activities or possible missed opportunities.

Recommendation 5.1: The Management Committee should include two external members with asset recovery expertise to complement MC strengths and who can also highlight for the MC areas or activities where StAR can supplement existing anti-corruption initiatives and programs of the parent institutions.

Recommendation 5.2: The Management Committee should enable the Secretariat to hire additional core staff based on a staffing needs study that is matched to the work plan and projected future requirements.

Finding 6: While StAR's organizational structure has supported its current level of effectiveness, granting it more autonomy in certain operational areas, within the context of an overarching strategy, could enable it to tap into further potential.

Recommendation 6: MC should consider defining some degree of operational autonomy, within the context of an overarching strategy, which would enable StAR to streamline some of its internal processes and act proactively.

Finding 7: The Management Committee should play a more active role in advocating for StAR inside the respective partner organizations. Despite the relatively modest resources allocated to StAR, its catalytic effect can be maximized by additional synergies fostered by MC efforts in both parent institutions.

Recommendation 7.1: The MC should encourage other senior leaders in both organizations to pro-actively support StAR through messaging and streamlined practices to facilitate the operation of the Initiative.

Recommendation 7.2: The Secretariat should undertake a concerted effort to increase StAR's collaboration with other in-house partners based on an internal stakeholder mapping exercise.

Recommendation 7.3: The Secretariat should revise the Partnership Charter to incorporate this report's recommendations and submit the amended version to the Management Committee for review and approval.

Finding 8: The advantages of the UNODC/World Bank partnership derive from a leveraging of both partners' core competencies and their institutional standing. The partnership provides a unique platform that sets it apart from other actors in terms of the implementation of StAR's mission.

Finding 9: The disadvantages of the current partnership arrangement, in terms of implementation, revolve primarily around the management of different internal processes in partner institutions (i.e. hiring, resource mobilization & tracking, and internal coordination).

Monitoring & Evaluation

Finding 10: StAR has made modest but inconsistent progress in strengthening its M&E processes during the period under review. StAR's monitoring and evaluation activities evolved organically as

needs arose, although it still does not have a comprehensive framework in place. Since 2018, a more systematic approach has been introduced as a result of donors requests for evidence of progress and/or outcomes attained. Additional improvements are required in order to provide decision makers and team members with the relevant data for managing, improving and measuring effectiveness of the Initiative.

Recommendation 8.1: StAR should develop a comprehensive M&E framework, building upon current practices (including those used by UNODC) and adopting/adapting good practices from other institutions. The processes should foster the participation of StAR team members in order to generate buy-in. The information gathered through StAR's M&E framework should facilitate decision-making, resource prioritization, learning and programme improvement.

Recommendation 8.2: StAR should promote the exchange of good practices and lessons learned with comparable institutions.

INTRODUCTION

The Stolen Asset Recovery Initiative (StAR) works with a diverse group of stakeholders—including countries, financial centres, civil society groups and international institutions—to support efforts to deny safe havens for corrupt funds, including through asset recovery. StAR, created in 2007, is a partnership between the World Bank Group (WBG) and the United Nations Office on Drugs and Crime (UNODC).

Under WBG processes, multi-donor trust funds (MDTF) like StAR undergo an evaluative external review every five years. Accordingly, the StAR management committee (MC) requested an external review of StAR covering the period 2013-2018.

The purpose of the external review is to inform decisions of the MC regarding the StAR initiative, its strategic direction, and its implementation arrangements; in particular, regarding the extension of the current StAR sunset clause (to be decided by the MC by the end of 2019). The external review may prove useful to external stakeholders as well, including partners, donors, and potential donors, regarding continued or expanded financial support for the Initiative.

The review was conducted by an external panel of experts (who focused primarily on strategic relevance, effectiveness and sustainability) and a lead evaluator (who focused on partnership plus monitoring and evaluation). Some findings could have been situated under multiple sections of the report, and were thus placed where they would best facilitate analysis and logical flow, while avoiding repetition. For example, because partnership issues permeated across the other topic areas, the Panel and Lead Evaluator adopted a shared approach to evaluating that topic.

Although this report combines the work of both the Panel of Experts and the Lead Evaluator, all of whom collaborated closely, it is important to note that the Panel was not tasked to look at StAR's M&E system and thus cannot endorse, for that reason, the findings and recommendation related to that topic. The Lead Evaluator, having been privy to the proceedings of the Panel, fully endorses their findings and recommendations.

The majority of the panel agreed to include names of specific countries considered emerging financial centres in global money laundering though at the request of the StAR Initiative, the authors have removed from the final version of the report those names. The evaluators agreed to do so for the following reasons: 1) listing them could jeopardize StAR's on-going efforts with those countries and 2) the names are already widely known to those who are familiar with money-laundering/asset recovery issues.

While the evaluators sympathize with the reasoning behind StAR's request, they consider it a missed opportunity to provide specificity to the evolving nature of the problem. The fact that naming countries is in and of itself problematic, highlights the constraints imposed on StAR. The obfuscation of information is symptomatic of the state of affairs of international asset recovery and the dynamics of international organisations mandated to address it.

The decision to remove the country names is in line with the United Nations Evaluation Group (UNEG) Norms and Standards for Evaluation (2016)¹ and the Joint Committee on Standards for Educational Evaluation (2011).¹

¹ The United Nations Evaluation Group (UNEG) Norms and Standards for Evaluation: Norm 5: Ethics- "[...] Evaluators must respect the rights of institutions and individuals to provide information in confidence,

The report is organized under five headings: strategic relevance, effectiveness, partnership, monitoring & evaluation and sustainability. The review identifies and outlines key findings succinctly with supporting evidence, and makes recommendations where appropriate.

must ensure that sensitive data is protected and that it cannot be traced to its source [...]”; Standard 3.2 Ethics- “Ethical principles for evaluation include obligations on the part of evaluators to behave ethically in terms of: [...] the avoidance of harm.”; Standard 4.9 Evaluation Report and products- “The evaluation report should state the limitations faced.”

The Joint Committee on Standards for Educational Evaluation: Concern for Consequences and Influence: “Evaluations should promote responsible and adaptive use while guarding against unintended negative consequences and misuse.” (Utility Standard 8); “Transparency and Disclosure Evaluations should provide complete descriptions of findings, limitations, and conclusions to all stakeholders, unless doing so would violate legal and propriety obligations.” (Propriety Standard 5)

Finding 1: StAR's asset recovery mission is and will remain relevant in a world of evolving technologies, document dumps, and increased global attention to corruption.

There is no doubt that StAR remains relevant. Asset recovery is an important issue across jurisdictions in line with increased public sensitivity to corruption among political elites. The asset recovery landscape has changed in several critical ways since StAR was founded, due to: a) major leaks exposing havens and previously hidden illicit financial flows, b) the increased role of emerging financial centres in global money laundering, c) enduring shortcomings in mitigation efforts and international Law enforcement cooperation among some financial centres in developed countries, d) new technologies that enable asset tracing (and hiding), e) increased global contention over free expression and investigative media in particular, f) an enhanced, worldwide awareness of the perils of corruption, g) increased enforcement efforts in critical countries with spill over effects (e.g. Brazil, Malaysia), and h) an enhanced awareness of the link between asset recovery and sustainable development, particularly the weight given to asset management and appropriate use upon its return for the benefit of the people in the receiving country, along the lines of the 2030 Addis Agenda and the SDGs. StAR has largely demonstrated responsiveness to the changing environment, though it remains limited by constraints outlined below.

In the last years more fora are addressing issues related to asset recovery, among them: the OECD, ADB, FATF, and G20 who have all increased the efforts in this field. In addition the International Center for Asset Recovery (ICAR) provides case support services in this area. This shows on the one hand an increased awareness about the importance of the issue at the policy level, and it also underscores the necessity and uniqueness of StAR's contribution to the field, due to its nature (an effort of two credible international institutions) and its scope: with an international reach, its capacity to leverage, connect and facilitate work.

Some of these changes affect the initial assumptions from the time of StAR's founding. For example, the need to raise general awareness about the importance and process of asset recovery has decreased, and assumptions around the need to build law enforcement and prosecutorial capacity in the developing world may have been overstated in hindsight. At the same time new or enhanced challenges become more prevalent: international coordination, collective action, illicit financial flows (IFF), and, particularly—a growing awareness among practitioners and academics that safe havens for IFF are proliferating in countries outside of the usual spectrum of governance initiatives.

Recommendation 1: The MC should extend StAR for a term of ten years. The MC should secure sufficient and sustainable levels of funding to ensure implementation of StAR's work and support the Secretariat's fundraising efforts. A mid-point evaluation should be carried out in order to assess progress.

Finding 2: StAR's comparative advantages are its global platform, credibility, convening power and technical expertise. These strengths are applied through its three areas of work (Policy Influence & Partnerships, Country Engagement and Knowledge & Innovation), though more focus could be channelled toward the global problem of safe havens for stolen assets, which is a core element of StAR's original mission but has not been sufficiently prioritized in recent years.

StAR's mission statement says it should "Support international efforts to deny safe havens for corrupt funds, including through asset recovery." In practice, in the view of the evaluators, StAR appears to spend a large amount of time facilitating cooperation and on capacity building in developing countries (which are seldom used to house stolen assets). Admittedly, there is a need for effectively ensuring a level of law enforcement cooperation needed to develop the predicate crime evidence for asset recovery. The issue is whether StAR should rebalance its efforts and allow more of the capacity development work to be performed by others, including international law enforcement and development agencies. Upon its founding, StAR's defining distinction was an approach to corruption and asset recovery that moved away from a primary focus on corruption in the developing world and toward a greater scrutiny on the financial centres and offshore jurisdictions that hosted the stolen assets. But today, every documented country engagement appears to be with a developing or transitional country (see Annex 3), and most of the publications seem intended for a developing country audience. Most people interviewed during the course of the external review, including StAR clients and staff, seemed not to know that denying havens in the developed world and in offshore centres was a part of its mission at all.

Outside of the developing world, new havens have proliferated since StAR was founded, but there has been scant policy response. During the period under review, emerging financial centres have played an increasing role in protecting stolen assets from recovery. Their lack of cooperation with asset recovery efforts has become even more notable as more countries have initiated asset recovery processes and are regularly identified by StAR clients as non-cooperative jurisdictions. Because these haven countries are unlikely to request assistance in asset recovery from a multilateral institution themselves, StAR's current work program has largely left the issue unattended.

To pursue its original mission to deny havens for stolen assets, StAR could pursue a range of options within or tangential to its current activities, for example: through its advocacy and knowledge building work, arguing for greater compliance with UNTOC, UNCAC, and FATF—both formally and informally. StAR could also work to push these organizations and frameworks to be more focused on rooting out such havens (for example, encouraging FATF to scrutinize such offshore centres more closely in its grey and blacklisting process). StAR could also consider engaging in more proactive, strategic interventions, rather than responding on-demand to country requests, as it currently does in its work program. In a context of scarce resources, this may require more prioritization and selectiveness in country engagement. This adjustment would allow StAR to increase its efforts in the Policy Influence & Partnerships and Knowledge & Innovation workstreams. This shift would help in combatting mission drift and mission creep away from safe havens.

Recommendation 2: Given StAR's mission, reach and stature - and that no other organization has taken up this mantle - it should redouble its efforts on building global momentum to deny havens for stolen assets. StAR should revise its strategy accordingly, modifying its approach and operational model as appropriate.

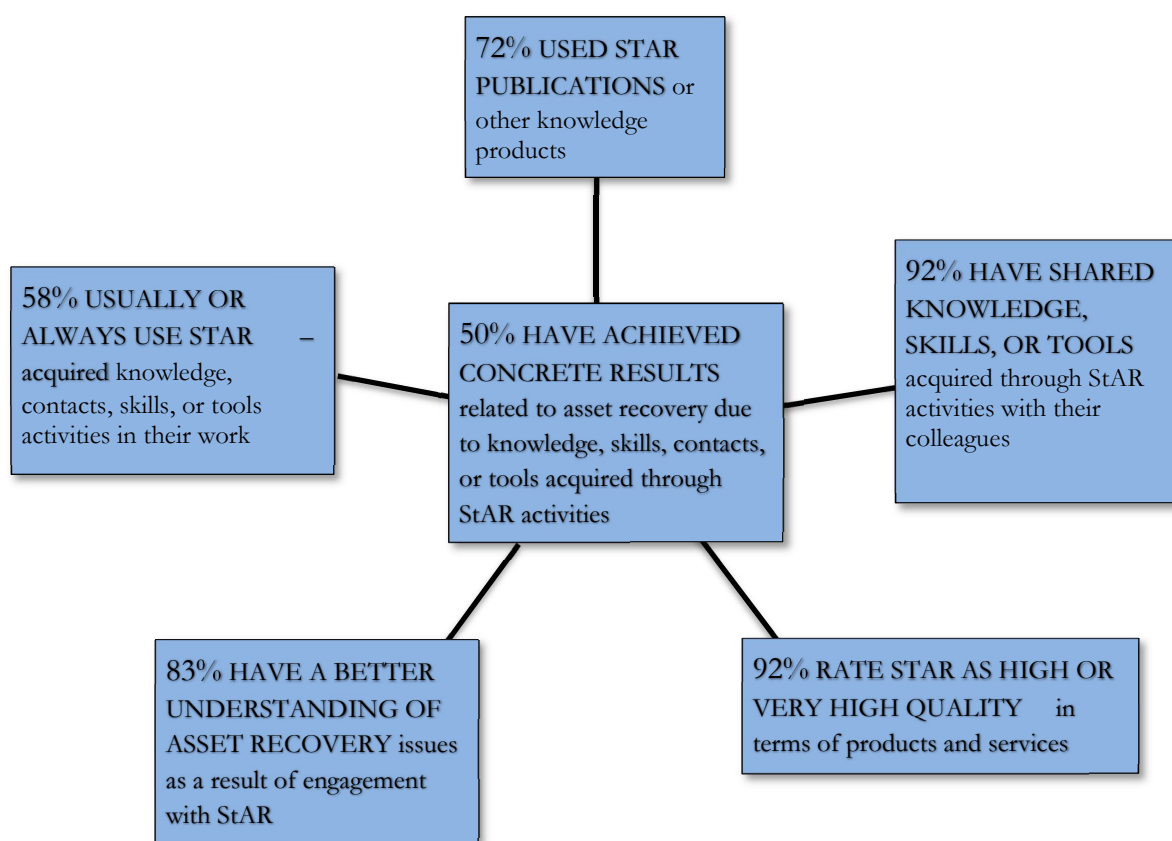
EFFECTIVENESS

Finding 3: StAR services and products are considered to be valuable and useful by direct beneficiaries and other stakeholders. StAR sets itself apart through informative and accessible knowledge products, effective policy influence, and, especially for certain countries, a unique ability to intermediate countries on both sides of an asset recovery case. Some other groups provide similar capacity-building activities and facilitate inter-country

communications (e.g. ICAR, and the law enforcement and development arms of various countries), but StAR's knowledge products and its unique ability to broker between countries or draw on the convening power of the World Bank and UNODC to organize country-specific or multi-jurisdictional 'asset recovery forums' are generally not duplicated by any other institution.

The surveys and interviews conducted during the evaluation revealed much appreciation of StAR's knowledge products and acknowledgment of its facilitation, country engagement work, and influential advocacy work and agenda-setting². In general, since StAR's founding, asset recovery itself has been successfully mainstreamed as a priority for numerous global and national institutions. As a multilateral initiative with an effective advocacy apparatus and the backing of two preeminent global institutions, StAR plays an effective role in advocating for AR priorities, though there is ample room for more efforts to be directed at denying safe havens (as described in Finding 2).

Within the boundaries of available evidence, the data collected as part of this evaluation points to an overall positive picture of StAR's effectiveness under its three workstreams. The surveys and interviews indicate high recognition of value created through StAR's knowledge products, facilitation work, policy influence, and country engagement.



² For example, pushing to incorporate corruption into FATF's agenda, and advocating for a focus on beneficial ownership in the G20 Anti-Corruption Working Group.

Fig. A – survey data from StAR beneficiaries (included counterparts who received StAR support, attended StAR events, utilized StAR products, or received technical assistance) Source: review survey

StAR knowledge products are highly valued by users, particularly the reports entitled *Few and Far Between* and *Puppet Masters*. They have been read and put to use by practitioners across jurisdictions. Success in this realm has been measured quantitatively by downloads (see Figure B below), but—more indicatively—by user-reported utility among different audiences. Many survey and interview participants cited both publications as definitive in the field and well-recognized across asset recovery practitioners in developing, transitional, and developed countries. Notably, asset recovery practitioners in developed and developing countries alike tend to be familiar with StAR publications, and both audiences tend to derive value for their work.

Fig. B – download data provided by StAR

	Asset Recovery Handbook (2011)	Puppet Masters (2011)	Few and Far Between (2014)	A Good Practices Guide for Non-conviction Based Asset Forfeiture (2009)
Total downloads ³	11,317	20,666	2,341	7,929

Source: World Bank's Open Knowledge Repository (OKR), World Bank Documents and Reports, and StAR website (2017-18 only)

Despite the success of early publications, there was a turn away from research in 2011, attributed internally to a high and expanding demand for country assistance. This has endangered the success of StAR's knowledge products as publications become more dated.⁴ There is a growing need for continued investment in this work stream. In general, it appears that staff and leadership want to devote more time to research, to highlight, among other issues: how corporate vehicles enable official corruption, the use of insolvency proceedings for asset recovery purposes, forms of international cooperation, failures to comply with FATF recommendations and UNCAC and UNTOC obligations, and the types of actors or structures that facilitate money laundering.

Recommendation 3: To the extent a balance must be struck between country engagements and knowledge products on an on-going basis, we recommend that more emphasis be placed on knowledge products, which StAR is uniquely qualified to develop. Such products tend to complement the assistance needed by countries seeking StAR support.

While few organizations have stepped forward to address the issue posed by proliferation of havens for stolen assets, there are several organizations in addition to StAR (e.g. ICAR and bilateral donors from asset-hosting countries) that conduct similar capacity-building country engagements

³ Combined figures for total downloads from the World Bank's Open Knowledge Repository (OKR), World Bank Documents and Reports, and StAR website (2017-18 only). Figures from OKR and Documents and Reports are accurate as of 10/30/2019. Downloads from the StAR website pre-2017 are pending.

⁴ Certain flagship publications are slated to be updated this year.

with developing nations in pursuit of their assets stolen through corruption. That said, interviews with beneficiaries indicate a high level of satisfaction and appreciation of in-country work done by StAR—a finding echoed in survey responses (see Figure C).

Figure C – Quotes from beneficiary surveys and interviews regarding results of StAR country engagement:

- *“StAR worked with anti-corruption people in Bangladesh, and I worked with anti-corruption investigators to seize and repatriate millions of dollars to Bangladesh.”*
- *“I work with the countries who have benefitted from StAR training...and benefit from guidelines established by StAR.”*
- *“We managed to advocate and get adopted the law that established the new Asset Recovery Agency in Ukraine.”*
- *“Our voices are now being heard and respected on principles of accountable assets return, and new legislation is now being passed in Nigeria concerning asset recovery and management.”*

Source: Review survey and interviews.

In practice, StAR’s country work often occupies a middle ground between the applied casework of organizations like ICAR and a more generalized technical assistance (e.g. drafting legislation, conducting trainings, facilitating international cooperation, and scoping cases), which is also done by UNODC independently as well as other capacity-building organizations. StAR tends to orient its broader work program around asset recovery cases, but it does not work on cases directly.

Many countries make similar or identical requests for support from StAR, ICAR, and other organizations and governments. This creates a dilemma between the risk of duplication and the desire to offer governments a diverse array of assistance types. Perhaps the main risk of duplication is that StAR becomes bogged down in excessive technical assistance and training commitments that other organizations can sufficiently handle, at the expense of its core mission and distinctive strengths, like advocacy, convening power and research. This results in some tension around prioritization, focus, and overall strategy for StAR.

While other organizations conduct general asset recovery technical assistance of a similar calibre to StAR, StAR sets itself apart in its ability to act as a broker between countries on both sides of an asset recovery case. StAR experts have frequently served to bridge MLA communications between requesting countries and the financial centres and offshore jurisdictions hosting the assets in question. This is particularly welcome in developing jurisdictions that lack the law enforcement capacity or pre-existing networks to initiate and conclude such requests. Furthermore, in an environment where trust is at a premium between agencies from different countries, StAR’s intermediation has been particularly valuable, especially where leveraged alongside the extensive networks and convening power of the World Bank and UNODC.

Although StAR is generally aware of its strengths and weaknesses in terms of country engagement, there seems to be a reluctance to decline assistance where it is requested. Unfortunately, the country focus may cause StAR to miss opportunities for engagement with other actors, like civil society or the private sector, on broader priorities. As mentioned, this also undermines StAR’s

mission of focusing on safe havens among developed country, offshore, and new financial centres, and skews the focus toward developing countries. Given its limited budget and staff, StAR is spread too thin to support the number of requesting countries properly and to also conduct the other activities it regards as vital to its mission (e.g. research and advocacy).

Figure D – Examples of StAR Policy Influence:

- StAR helped five countries design and adopt new laws related to asset recovery over the past two years.
- StAR has played a central role in the UNCAC COSP and Asset Recovery Working Group process since its founding—leading sessions on frontier topics such as GFAR principles and asset management / disposal.
- StAR has worked to highlight the importance of international cooperation in the asset recovery process—facilitating this development and proliferation of Asset Recovery Interagency Networks (ARINs), and publicizing their value at international forums.
- StAR has helped to bring the concept of beneficial ownership to the forefront of the global conversations around corruption and illicit finance, particularly notable in its spotlight at the G20.

Source: Review survey and interviews.

Finding 4: StAR has made important strides in disseminating information on its activities and results to partners, policymakers and practitioners. The introduction of “The StAR Quarterly” newsletter, a rise in Twitter activity, plus informal briefings to donors and more succinct annual reports have increased and maintained stakeholder engagement. However, the lack of a guiding communication strategy and the level of effort required to maintain momentum misses important opportunities to leverage influence and share knowledge, and taxes StAR’s already stretched resources.

There has been a concerted effort to enhance the frequency and substance of StAR’s communications with stakeholders and the wider public over the period under review. Evaluators were advised that this enhanced communication approach was necessary for donors and appreciated by interested readers. There are some indications that StAR is reaching ever more people. One stakeholder stated: “[...] it is very positive to see both the quarterly report StAR is publishing as well as their activity on Twitter, which I think is giving the Initiative more visibility.” In this vein, the StAR website is slated to undergo a complete re-design to improve user-friendliness, though there seems to have been some significant delay in this endeavour.

Fig. E – Communications data provided by StAR

	2016	2017	2018
Website unique visitors	81,911	45,381	29,966
Twitter Followers	unavailable	2,865	3,331 10/2019: 4,949

Top website visitors by country, 2017-18 (by unique visitors) <ol style="list-style-type: none"> 1. United States 2. United Kingdom 3. Philippines 4. India 5. Canada 6. Indonesia 7. Germany 8. France 9. Pakistan 10. Nigeria 11. Ukraine 12. Russian Federation 	Website sections visited, 2017-18 (by unique visitors)		
		2018	2017
	Corruption Cases (Asset Recovery Watch & Settlements database)	37.4%	44.3%
	All other website sections	62.6%	55.7%

Several donors acknowledged the value of alternative means of exchanging information, with one saying: “The newsletter and twitter provides us with a better view but also informal communications take place [...] we have plenty of contact opportunities (at various fora)”. Complementing its communication efforts with donors, StAR has also addressed the requests made by some for improved, indicator-based reporting, so as to provide systematic and consistent data over time (see the section on monitoring and evaluation for more information).

However, there seems not to be a communication strategy that guides StAR’s approach in order to maximize potential value. If such a strategy exists, staff and leadership are not in consensus on its purpose and guiding principles. Institutional factors and internal processes within the World Bank seem to contribute to the difficulties in defining such a communication strategy and even in issuing short term communications. While this may or may not be flexible, it comes at a cost for StAR.

Likewise and perhaps contributing to the aforementioned issue, StAR has had difficulty communicating its contribution and importance within the World Bank, which may have marginalized StAR and limited its potential over time.

Recommendation 4: The MC should define, with the support of the Secretariat, a communications strategy that may be implemented with some autonomy by StAR- granting it some flexibility. Such a strategy would define targets and a strategic purpose aligned to its mission. To ensure sufficient implementation, resource allocation will need to be deliberate. If the World Bank’s internal processes don’t allow for deployment of a strategic, independent, and flexible communications plan, perhaps UNODC procedures may; if not, the expectations of StAR’s effectiveness should be lowered and reconsidered accordingly for the next period of review.

SUSTAINABILITY

All of StAR’s work streams are interconnected- having important spill over effects among themselves and into the Initiative’s overall effectiveness. Research and knowledge management, for example, have been key to StAR’s legitimacy and credibility, and have also been an enabling factor

for country assistance work. The same can be said about country assistance, advocacy, and international facilitation work. In order to ensure that StAR has sufficient resources to continue to work on all interconnected workstreams, priorities need to be carefully determined. Considering the resource constraints and need to invest more in areas like denying safe havens, the reviewers recommend that StAR rebalance and reduce the quantity but not the scope of its work, in order to respect the reinforcing elements of its broad program.

There are other factors at the operational level, elaborated in the other sections of the report that appear to affect the sustainability of StAR's efforts, among them:

- Staff rotation, over reliance on short-term consultants, and hiring freezes affect knowledge management, internal capacities built over time, and institutional memory.
- Conflicting or changing senses of priority within the internal structures of the World Bank or UNODC respectively, which make the operational and financial sustainability of the initiative vulnerable.
- The operational model, which tends to emphasize reactive over proactive action, and reduces the capacity of StAR to adapt to emerging challenges with flexibility.

PARTNERSHIP

Finding 5: The StAR partnership between UNODC and the World Bank provides the basis for an efficient means to achieve desired outcomes for asset recovery, though there is room for improvement. The MC members interviewed voiced strong support for StAR's work. The operational latitude given by the Management Committee (MC) to the Secretariat allows flexibility and responsiveness, though more strategic support and guidance from the MC would be useful. Challenges appear to be largely bureaucratic, and often result in delayed implementation of activities or possible missed opportunities.

Roles

StAR was established through a Partnership Charter in 2007, which was amended in 2018. The Charter states StAR's goal, objectives, principles, and work pillars. The Charter set a two-tier decision-making arrangement: (i) a Management Committee, which provides strategic guidance, and (ii) the StAR Secretariat, which manages day-to-day activities. A StAR Donor Consultative Group was also created, having a consultative role regarding future plans and past activities, though not involved in the approval of StAR's work plan, budget, operations or products.

The Partnership Charter also details planning and implementation arrangements as well as the administration of the Multi-Donor Trust Fund, World Bank-UNODC coordination, monitoring, evaluation, and reporting responsibilities. As a complementary instrument, an Operations Manual contains the processes to be followed by team members. It was revised this year.

The Charter and the Operations Manual provide the necessary framework to facilitate StAR's work. The governance roles, functions, and procedures are clearly delineated.

In practice, the framework has been implemented to maximize the Secretariat's operational latitude vis-a-vis the Management Committee. The MC approves StAR's work plan and budget but does not attempt to manage the Secretariat in its daily execution. Generally speaking, the team's autonomy seems to have had a positive impact on the work—there is more flexibility, responsiveness, and local decision-making. That being said, the hands-off approach by the MC appears to have led to a lack of high level focus on StAR, and a lack of incorporation of its mission into other priority UNODC/World Bank anti-corruption programs. Evaluators noted that there have

been few MC meetings over the years (as established in the Charter), and long vacancies in its membership. This may have contributed to fundraising difficulties in recent years. All told, it brings a significant disadvantage: a weak link between StAR's mission, its overarching and original strategy, and its operational approach (see Finding 2). The light-touch oversight works reasonably well on a day-to-day basis, but it has arguably resulted in StAR's drift away from prior mission goals tendency to spread thinly across many commitments.

Considering that MC membership is limited to representatives of the partner institutions, external perspectives at the highest strategic and goal-setting level are missing which may also contribute to the aforementioned issue. Undoubtedly, institutional knowledge is highly valuable and essential for understanding the internal constraints and opportunities faced by StAR. On the other hand, the evolving internal institutional priorities and pressures can adversely affect StAR's work, through mission creep and drift.

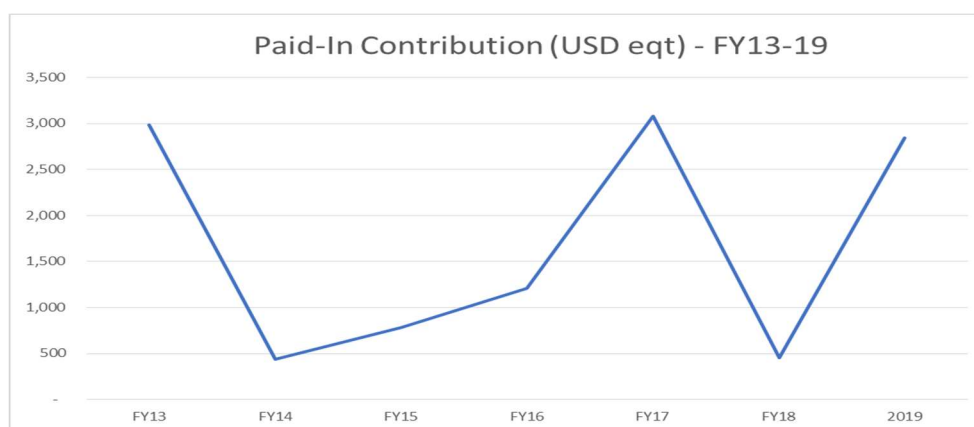
In order to enrich strategic deliberations and provide an external view on emerging trends and practices, the Management Committee could benefit from having external members, perhaps in a non-voting capacity. These members would be leading practitioners and advocates in the asset recovery field.

Funding

StAR's funding derives from the Multi Donor Trust Fund (MDTF) and from the World Bank global engagement budget. The MDTF covers a portion of fixed costs and a range of variable costs, including: programming, travel, consultants, and production of StAR materials. There is also a separate project budget for UNODC's contribution to the work of StAR, which covers the costs of seconded UNODC staff and selected activities.

In accordance with the Partnership Charter and the MDTF Transfer Agreement, UNODC can request a transfer from the MDTF to its budget line for StAR activities led by UNODC. This has occurred almost yearly since StAR's establishment for amounts up to \$600,000. However, as UNODC has recently received additional and increased funding for its portion of StAR's activities, joint fundraising efforts are now focused on developing proposals for this part of the funding in addition to the MDTF.⁵ In this new configuration, it will be important for StAR and its component parts to maintain overall budgetary and reporting coherence.

Fig. F- StAR Funding 2013-2019 (Source: StAR)



⁵ In 2018, the MDTF received contributions from Australia, Switzerland and the UK (DFID and FCO), while Belgium, Luxembourg, Norway and the US also contributed to the UNODC budget for StAR activities (with Germany expected).

Coordination

The Secretariat's senior managers, led by the StAR Coordinator in consultation with a UNODC counterpart, collaborate (formally and informally) in order to formulate and implement the work plan and respond to unforeseen situations. Contact between the staffs based at UNODC and the World Bank is somewhat limited, though there is a monthly conference call, held in order to provide progress reports and address upcoming activities. Most surveyed assessed it to be very useful, though participation in these calls appears to be incomplete and inconsistent due to scheduling conflicts and prioritization.

There are signs that the collaboration is improving. A team member stated "Communication and coordination between the WB and UNODC teams has improved significantly [...] We now conduct monthly team meetings, have set up a shared folder system for work documents, and our quarterly newsletter also contributes to improving information exchange since it is easier to find out what colleagues are working on."

A partnership between disparate institutions is unlikely to be seamless. Although advantages are derived from combining the strengths of two organizations, challenges also emerge, given differing institutional mandates, culture, and processes. As a former StAR collaborator said, "Efficiency gains which may be possible due to the slightly greater political independence of the World Bank in comparison to UNODC may in some cases be lost through the adding of two bureaucratic systems, and in particular apparently growing complexity of obtaining approvals at various levels for seemingly mundane issues."

The need for more full-time dedicated staff is a severe constraint on StAR's effectiveness. In particular, the hiring freeze at the World Bank seems to be the biggest limitation, leading to an over-reliance on short-term consultants. The high rotation of short-term and part-time personnel can be detrimental to motivation, stability, co-ordination, and institutional memory, though it does facilitate country and facilitation work and allow for financial flexibility. StAR is pursuing various work-arounds, including the possibility of using UNODC as the primary hiring entity.

Similarly, UNODC staff can only be seconded to the World Bank for a maximum of four years under WB rules. The potential loss of continuity of service and StAR institutional memory caused by this practice is significant.

Overall, the partnership implementation issues that require continued attention by the Secretariat centre on practical, day-to-day operational matters—they are not of a strategic nature. These issues should be resolved while adhering to the internal processes established by the partner organizations. The partnership modality as set by the Charter is an appropriate means to run the Initiative.

Recommendation 5.1: The Management Committee should include two external members with asset recovery expertise to complement MC strengths and who can also highlight for the MC areas or activities where StAR can supplement existing anti-corruption initiatives and programs of the parent institutions.

Recommendation 5.2: The Management Committee should enable the Secretariat to hire additional core staff based on a staffing needs study that is matched to the work plan and projected future requirements.

Finding 6. While StAR's organizational structure has supported its current level of effectiveness, granting it more autonomy in certain operational areas, within the context of an overarching strategy, could enable it to tap into further potential.

There are aspects of the organisational arrangement that work well within the limitations and complexities of such a partnership arrangement. There are other hurdles that could be minimized, mostly operational (e.g. staff management, knowledge management, communications, donor reporting). It appears that streamlining some of those processes would free up resources needed to

support mission-related tasks. Fulfilling the mission of denying safe havens and the challenges of a constantly changing environment both require a pro-active and strategic approach. StAR is operated like the joint project it is, but as such, lacks certain autonomy desirable in the context of these operations, and that other actors in this field have.

The Initiative has work plans and a laid out theory of change, but seems to lack an overarching strategy that responds with agility to evolving challenges, restrictions, and opportunities. Outside the internal or external review processes like this one, there is little strategic thinking to drive the activities. This has to do with the operational model and potentially with the restrictions inherent to a hybrid undertaking such as StAR. It is likely that such an effort would enable StAR to optimise impact and avenues for action, to put communications at the service of its mission and to engage with stakeholders strategically. The absence of a strategy may not have been visible when StAR was operating primarily under a “requesting country” model, but if the Initiative wishes to go beyond that it will become necessary.

Within the authority of Partnership Agreement, there could be expanded latitude for StAR to operate more freely. The MC should consider facilitating the below developments (some mentioned before):

- Consider an expanded delegation of authority to the StAR Coordinator;
- Stabilize StAR’s staffing capacities;
- Enable autonomous communication within the range of an agreed strategy and a broader stakeholder engagement;
- Incorporate other stakeholders' views to its strategic guidance by either adding third parties to the MC or establishing an advisory board;
- Consolidate reporting on operations and other accountability processes;

Recommendation 6: MC should consider defining some degree of operational autonomy, within the context of an overarching strategy, which would enable StAR to streamline some of its internal processes and act proactively.

Finding 7: The Management Committee should play a more active role in advocating for StAR inside the respective partner organizations. Despite the relatively modest resources allocated to StAR, its catalytic effect can be maximized by additional synergies fostered by MC efforts in both parent institutions.

One of the advantages that emerges from the partnership is StAR’s ability to collaborate with relevant units from each parent institution. This is the main reason for the StAR Secretariat being located within the World Bank’s Financial Stability and Integrity Global Practice and in UNODC’s Corruption and Economic Crime Branch (CEB) in the Division for Treaty Affairs (DTA). The close links with AML activities and UNCAC implementation and provision of technical assistance to countries make this set-up appropriate. Yet StAR could potentially transcend the “boundaries” normally associated with those units that host it- yet it has not done so to a significant degree.

StAR is perceived, according to many team members, as a small initiative in comparison to the related work being carried out by the World Bank. A couple of stakeholders mentioned that they perceive that StAR is not a priority for senior World Bank management as there appears to be “[...] a certain lack of support and engagement from (WBG) top management”. This assessment was shared by a senior manager at the Bank, in a more nuanced fashion: “StAR is important for the institution and is recognized by clients. It is not the core for World Bank business, so StAR isn’t part of the usual internal conversation with country representatives for example. [StAR] is very specialized [...] The Bank has other important areas of work.”

The departure of key managing directors and the perception, shared by many interviewees, that the World Bank is more risk averse now when it comes to anti-corruption engagements than before, has resulted in a change in the enabling environment for StAR. An internal stakeholder stated that “The perceived level of support impacts on how the rest of the house deals with StAR- meaning it is less now [than before].” In the past, for example, StAR was used as the World Bank’s “agent” on anti-corruption and asset recovery issues in the G7 and G20, but those fora are less focused on the topics in the past couple of years, so StAR’s internal attractiveness has diminished to a degree.

Other stakeholders mentioned that UNODC could also improve the coordination of several of its initiatives (AML, CFT, policy research, etc.) in order to take more advantage of potential synergies with StAR.

One of the responsibilities of the Secretariat is: “Coordinating implementation of the work plan across the Bank and UNODC, with clear deliverables and accountability for results.” This responsibility presupposes that the possible links with other internal partners have been identified and areas of collaboration determined. The Secretariat has made efforts, especially inside the Bank, to publicize StAR, but more work is required to take advantage of complementary efforts (e.g. with the Governance Global Practice). The same holds true for UNODC.

Other units of UNODC and the World Bank that are not currently engaged with StAR, could be leveraged to add value across the board. This would require that MC members advocate for StAR at the highest levels in a systematic, purposeful fashion. The Secretariat can suggest to the MC where efforts can be directed to maximize usefulness. The intention is not to pursue collaborations just for the sake of it, but to think outside the box or even piggy-back on other initiatives that reside outside StAR’s traditional internal partners. This would also signal to internal stakeholders the value and importance of StAR and the need to support its work.

StAR could, for example, expand its collaboration with internal partners working on policy analysis and advocacy. Similarly, the extent to which UNODC and World Bank country programmes embed AR into their work can also consolidate StAR’s efforts and promote their sustainability. In this regard, StAR’s involvement in the process initiated by the Addis Agenda for Financing Development is positive in that it links AR with related topics; likewise with the work currently underway on illicit financial flows.

Recommendation 7.1: The MC should encourage other senior leaders in both organizations to pro-actively support StAR through messaging and streamlined practices to facilitate the operation of the Initiative.

Recommendation 7.2: The Secretariat should undertake a concerted effort to increase StAR’s collaboration with other in-house partners based on an internal stakeholder mapping exercise.

Recommendation 7.3: The Secretariat should revise the Partnership Charter to incorporate this report’s recommendations and submit the amended version to the Management Committee for review and approval.

Finding 8: The advantages of the UNODC/World Bank partnership derive from a leveraging of both partners’ core competencies and their institutional standing. The partnership provides a unique platform that sets it apart from other actors in terms of the implementation of StAR’s mission.

The hybrid nature of the StAR venture is largely observed to be a net positive. Chiefly, the UNODC/ WBG partnership enables the StAR team to draw on two extensive networks and operate with the gravitas of both multilateral institutions that sponsor it—a rare dual prestige in the policy realm. Given that each institution has its own reputational vulnerabilities; StAR is able to strategically emphasize the more “favoured” organization in any given context while minimizing the other one to sensitive audiences.

Advantages

- Both organizations' mandates place them in a unique position vis à vis other actors
- Legal framework (UNCAC) provides a sound basis for engagement
- UNCAC Secretariat with access to COSP and ARWG
- Access to government partners, donors, and a broad range of other relevant stakeholders
- In-house expertise and experience
- Credibility due to track record of UNODC and WBG helps attract willing partners and makes engagement difficult to ignore
- Access to staff (multidisciplinary teams) and services of both organizations
- Synergies based on wide-ranging scopes of both institutions
- Country office network provides local knowledge and support
- Ability to convene diverse group of stakeholders
- Extensive professional networks
- StAR's own track record as a partner for diverse AR stakeholders

StAR's own track record in working on AR issues throughout its existence is an important aspect that cannot be overlooked. Although its genesis and continued value proposition originated via partnership of UNODC and the Bank, StAR itself is now an asset to both organizations, with a strong track record and brand recognition.

Finding 9: The disadvantages of the current partnership arrangement, in terms of implementation, revolve primarily around the management of different internal processes in partner institutions (i.e. hiring, resource mobilization & tracking, and internal coordination).

The hybrid nature of StAR does result in some disadvantages. Non-core staff members tend to give their primary loyalty to their parent organization rather than to StAR itself; subsets from both the WBG and UNODC teams are often pulled away from StAR programming to address the priorities of their respective parent institutions. The parallel weaknesses of both institutions, including susceptibility to lengthy hiring freezes at WB, also translate into rigidities in staffing processes, delays in decision-making, difficulties in addressing institutional communications, and slowed implementation of changes that could improve effectiveness.

Disadvantages

- Added bureaucratic layers that can lead to delays in response times, increased workloads, hiring limitations and communication shortcomings
- Team members' time can be taken up by other projects and institutional priorities with higher visibility and resources in their respective parent organizations at the expense of StAR work
- Occasional overlap and potential for duplication of efforts with projects/activities led by other units in both organizations
- Differences in monitoring and reporting processes
- Different organizational cultures
- Diminished sense of "team spirit" as majority of collaborators are located on different continents and remain saddled with other institutional commitments

Although bureaucratic challenges “come with the territory”, the Secretariat has managed to successfully navigate some hindrances to StAR’s work, as in the case of UNODC staff secondments. Moving forward, the role of the MC in helping to resolve key bureaucratic issues which the Secretariat has limited influence on will be critical (see Recommendation 1). The MC should not micro-manage, but should facilitate solutions that acknowledge the peculiarities that arise from a partnership of this nature.

Striking the appropriate balance between reliance on the services of a decentralized team and a solid core staff remains a challenge. Due to the hiring limitations already mentioned, support of short term consultants has been required to supplement the work that could be done by a reinforced core staff. With many team members having to dedicate much of their time to non-StAR tasks, it is difficult to generate a long-term common sense of purpose and an “esprit de corps”, potentially resulting in a disparate delivery of services. In essence, the review agrees with the view expressed by one of the stakeholders consulted: “I do not see a structural problem, but a capacity problem and punctual, random delays that do not necessarily have a structural background.”

Finding 10: StAR has made modest but inconsistent progress in strengthening its M&E processes during the period under review. StAR’s monitoring and evaluation activities evolved organically as needs arose, although it still does not have a comprehensive framework in place. Since 2018, a more systematic approach has been introduced as a result of donors requests for evidence of progress and/or outcomes attained. Additional improvements are required in order to provide decision makers and team members with the relevant data for managing, improving and measuring effectiveness of the Initiative.

The StAR Partnership Charter provides guidance regarding the monitoring, evaluation, and reporting framework for the Initiative. The Secretariat is tasked with developing and maintaining a monitoring and evaluation system to assess the progress and impact of StAR activities on an ongoing basis. The primary means for reporting progress are the annual reports, donor group and individual briefings, and the StAR Quarterly newsletter.

StAR reports on its work according to the internal processes of both partner organizations, with varying activities depending on which partner institution conducted the work. As the StAR Work Plan 2017-2020 states: “In the case of Bank-managed activities, Bank staff undertake monitoring and evaluation in accordance with Bank policies and procedures and in the case of UNODC-managed activities, UNODC staff undertake monitoring and evaluation in accordance with UNODC policies and procedures. For the World Bank, [...] FCI [...] has compiled the key indicators against which StAR is to report internally. For UNODC, the activities under the StAR Initiative are implemented as part of the UNODC “Global Programme to prevent and combat corruption through effective implementation of United Nations Convention against Corruption in support of Sustainable Development Goal 16” (GLOZ99), which also provides the legal, administrative and substantive framework and has separate mechanisms for Monitoring, Reporting and Project Completion; as well as for Evaluation.” The UNODC monitoring and evaluation framework, which is in place for the UNODC-run side of the StAR partnership, could be expanded and adopted by the whole Secretariat, though this would require a dedicated staff member.

Most observers suggest that, while amount of assets recovered is of obvious interest, it is not a particularly useful way to measure success of StAR or other asset recovery initiatives. While StAR does convey this metric in printed reports, many donors deem it unnecessary and counter-productive. Considering that asset recovery processes involve so many actors across jurisdictions, with critical decisions outside the control of StAR and other partners, to hold the Initiative accountable to such a metric is unfair and uninformative. While the support StAR provides is often considered to be a very important part of recovering assets, it is but one aspect of a complex system.

Likewise, informal brokering and partnerships development can be quantified (i.e. number of meetings or facilitations) but the results (cases moved forward) are largely beyond StAR’s control. It is therefore challenging to accurately measure the direct impact that StAR has on its mission of supporting international efforts to deny safe havens through asset recovery.

The 2013 Internal Review recommended that StAR strengthen its M&E mechanism since it was found to be deficient. StAR proceeded to map an AR theory of change, review its mission, vision, and goal statements, and develop a results framework (which has since been updated). Team members provide output data and selected results that are then aggregated and expanded in annual reports and the StAR Quarterly newsletter. Since July 2018, StAR has also been reporting on five indicators (see table below) at the request of donors. All these efforts are valuable, yet unfortunately, the overall picture of impact remains unclear.

It is good practice to clearly articulate an M&E framework, describing the system as a whole, its approach (including how to leverage the existing reporting requirements imposed by both organizations⁶), roles and responsibilities, tools, and more. As such, StAR has not articulated a comprehensive M&E framework, though as shown, some key pieces are there. The theories of change outcomes that StAR is working toward are not only key components of any LogFrame and related work plan, but can also become the cornerstone for an M&E framework. In order to develop one at this point, management must dedicate resources, including time, to get the process moving and generate buy-in.

A monitoring and evaluation “system” independent of its complexity, has to provide its primary users with the information required, for their intended use, in a timely fashion. The design and implementation of the StAR M&E system- with its corresponding M&E work plan- has to be commensurate with operational constraints of the Initiative. Ultimately, its success will depend on its usefulness for informing management decisions (e.g. resource allocation, implementation adjustments), tracking progress, and reporting on achievements.

The work done on the design and monitoring of the five indicators is very promising and can feed into the M&E framework. StAR team members use templates developed for the purpose of recording data on the indicators, which are then collated and analysed for subsequent reporting. The data collected is both quantitative and qualitative. The five mutually agreed indicators (see Figure G) are linked with the theory of change and the 2017-2020 Results Framework.

Figure G: Current indicators for monitoring and reporting results to donors, linked to other instruments

#	Five Key Indicators	Related Theory of Change Outcomes	Selected Indicators in the 2017-2020 Results Framework
1	Number of countries improving legislative framework on asset recovery	Legislation on AR in place Country has effective money laundering regime	Number and list of asset recovery legislation in place to which StAR contributed Number of countries improving their legislative framework on core asset recovery issues
2	Number of asset recovery cases opened that include a proceeds of corruption component	The Country Assistance TOC assumes AR cases are opened once preconditions are met.	Number of cases open that include a proceeds of corruption component Number of asset recovery cases initiated on the basis of administrative action / civil remedies

⁶ This is already being done to some extent. Information on activities conducted under StAR by UNODC is shared with the Secretariat. Although the Activity Report template UNODC uses, for example, is more detailed, StAR’s format collects data deemed useful also beyond the five indicators mentioned above.

3	Number of countries with improved domestic co-ordination mechanisms adopted as asset recovery action plan	Effective AR institutions are in place Domestic institutions effectively cooperate	Number of countries having an Action Plan for Asset Recovery to which StAR contributed Number of countries having formalized, with StAR assistance, domestic coordination mechanisms Number of countries having developed coordinated AR cases strategies with StAR support
4	Knowledge gaps and emerging trends identified and addressed in new knowledge products	Knowledge gaps identified Emerging criminal trends identified	Number of requests by countries or international bodies for data on emerging trends Number of good practices, trends and frontiers identified
5	Concrete inputs into key global asset recovery policy themes through leadership at events and through use of knowledge products	Global policymakers understand preconditions for successful AR Gaps in international standards identified International standards are adjusted Adoption of international standards by national authorities	ARWG recommendations and COSP resolutions reflect importance of asset recovery provisions, of StAR input, and progress in implementation Financial centres adopt and publish asset recovery strategies Number of new or amended IS adopted by national authorities Standard setters revise international standards as appropriate

These indicators could form part of the comprehensive monitoring plan. Some issues to consider related to monitoring and evaluating progress based the five indicators include:

- Indicator 1: Benefits of developing a simple rating tool to assess the legislative framework in countries at the beginning of a StAR engagement in order to eventually measure the “improvement”;
- Indicator 2: Revise the TOC in order to add an “AR cases opened” outcome. Consider the relevance and adequacy of the current indicators given that the Results Framework relates it to capacity building (e.g. others could be: number of potential cases reviewed using new knowledge, number of potential cases deemed as not viable etc.);
- Indicator 3: Improved domestic co-ordination occurs “downstream” to the existence of an AR action plan, thus the RF indicator pertaining to coordinated case strategies is more

indicative than the number of plans or mechanisms in place (both of which are proxy indicators). Consider other indicators, such as change in perception of stakeholders vis the effectiveness of the coordination mechanism, to obtain a more accurate measure;

- Indicator 4: Assumes an ongoing monitoring of knowledge gaps, trends, and good practices, allowing for these to then be identified and addressed. The importance of this assumption warrants it be reflected in the TOC as an outcome itself (currently not there). Doing so will highlight the importance of the work required to identify trends (not their number) and in proactively searching for knowledge gaps and good practices. Subsequently, results and activity indicators can be formulated and aligned based on the revised results framework;
- Indicator 5: Consider the degree to which the indicator is an adequate measure for its linked outcome(s).

Striking a balance between the data to be collected and the ability to do so (resources and instruments) is another challenge encountered when designing an M&E framework. An initiative such as StAR, with limited resources, must prioritize the key indicators that inform decision-making. The 2017-2020 Results Framework has 50 results indicators and 55 activity indicators- some easier to track than others. This is a huge burden and may therefore result in inconsistent tracking.

A case in point is StAR's work in capacity building. Capacity building is part of StAR's country engagement approach, with training- whether generic or case related- as an important sub-component. The monitoring of capacity building is therefore critical for management, improvement, and accountability purposes. One of the six indicators in the Results Framework under this category is the percentage increase of asset recovery knowledge-gain by stakeholders trained. This is an appropriate indicator to measure AR knowledge gain, yet there is little evidence of relevant data being collected in a systematic fashion across all country engagements. To do so, pre and post-assessments would have to become part of all training activities. A couple of team members have adopted this approach intermittently, which could serve as a starting point.

Beyond that, measuring the effectiveness of capacity building (through training) entails more than determining actual learning. A useful M&E framework should address the four levels of training evaluation (reaction, learning, behaviour, and results) so that StAR management and team members can have the necessary information to increase the effectiveness of their efforts. In order to achieve this, without overburdening the staff, requires making deliberate choices and trade-offs when designing the M&E framework.

Designing StAR's M&E framework presents an opportunity for exchanging good practices and lessons learned with other actors in the same field. UNODC has an established M&E system in place for their operations, with a dedicated M&E officer. Likewise, ICAR has designed various instruments to monitor and assess their work. Consulting with these, and others, could be useful.

Recommendation 8.1: StAR should develop a comprehensive M&E framework, building upon current practices (including those used by UNODC) and adopting/ adapting good practices from other institutions. The processes should foster the participation of StAR team members in order to generate buy-in. The information gathered through StAR's M&E framework should facilitate decision-making, resource prioritization, learning and programme improvement.

Recommendation 8.2: StAR should promote the exchange of good practices and lessons learned with comparable institutions.

ANNEX 1: METHODOLOGY

The review was conducted in adherence to its terms of reference and guided by Utilization-focused evaluation (UFE) principles. In order to address the review questions in the evaluation matrix, a mixed-methods approach for data collection was adopted. This approach facilitated the triangulation of evidence, leading to findings and recommendations based on broad and comprehensive data sets. The review adhered to the United Nations Evaluation Group (UNEG) norms and standards, particularly with Norm 6 dealing with the ethical conduct of the exercise.

The evaluation was conducted by external evaluators, comprised of a three-person panel of experts and a lead evaluator. Panel members had substantive expertise and a great deal of experience in stolen asset recovery work and related areas, as well as knowledge and familiarity with StAR. The Panel operated under a separate terms of reference. A geographical and gender balance in the evaluation team was achieved. The Panel assessed StAR's strategic direction, effectiveness and sustainability. The Lead Evaluator reviewed the UNODC-World Bank partnership and the M&E system in addition to coordinating the review.

The principal methods utilized were: document review, interviews, questionnaires and surveys. The Panel derived its findings, conclusions and recommendations, after reviewing all the data collected, through deliberations both in person and via conference calls.

A total of 58 persons were interviewed (individually or in groups). A total of 38 current and former StAR team members were sent a questionnaire and 299 other individuals, including donors, beneficiaries, and AR stakeholders, were invited to answer a survey. The Internal Review of 2013 served, when appropriate, as a baseline to compare the evolution of the Initiative.

The principal limitation encountered was a low response rate to the questionnaires and surveys. Response rates between 20-30% is often the norm in exercises of this type, thus caution must be used when interpreting the results. Response rates were:

- Questionnaire: current team members 42%, former team members 57%;
- Survey: donors 34%, beneficiaries 23%, and other stakeholders 20%.

The limitation was foreseen and mitigated by the use of a Panel of Experts in order to broaden the evaluative perspectives and evidence base brought to bear.

The evaluators agreed to StAR's request to remove from the final version of the report the names of countries considered emerging financial centres. Detailed explanation can be found in the introduction.

ANNEX 2: LIST OF PERSONS INTERVIEWED

W. M. Thanuja Damayanthi Bandara, Assistant Director Legal, Commission to Investigate Allegations of Bribery or Corruption, Sri Lanka

Chinedli Bassey, Civil Society Legislative Advocacy Centre (Nigeria)

Youssef Belgacem, TI Tunisia

Sara Brimbeuf, TI France

Nils Bruckhnisen, TI Germany

Laure du Castillon, Delegate Public Prosecutor, Ministry of Foreign Affairs (Belgium)

Polina Chyzh- Office of the Director, NABU (Anti-Corruption Bureau of Ukraine)

Gillian Dell, TI Secretariat

Gretta Fenner, Director of the Institute's International Centre for Asset Recovery, Basel Institute on Governance

Steve Goodrich, TI UK

Maheshi Herab, TI Sri Lanka

Alan Lally-Francis, TI UK

Kabir Gbolahan Latona, Assistant Director, Legal and Prosecution, Economic and Financial Crimes Commission (EFCC), Nigeria

Rob Leventhal, Deputy Director, U.S. State Department, Bureau of International Narcotics and Law Enforcement Affairs (INL), Office of Anticrime Programs

Kellen McClure, Anti-Corruption Advisor, Bureau of International Narcotics and Law Enforcement (INL) Department of State (USA)

Javier Mendoza-Rodriguez, First Secretary & StAR focal point at the Permanent Mission of Ecuador to the United Nations (Vienna)

Emmanuel Nweke, Counsellor, Permanent Mission of Nigeria to the United Nations (Vienna)

David Pimm, Senior Policy Research Analyst, International Crime and Terrorism Division (IDT), Global Affairs (Canada)

Vaclav Prusa, Civil Society Legislative Advocacy Centre (Nigeria)

Walter Reithebuch, Senior Policy Advisor – Anti-Corruption and Asset Recovery, Swiss Agency for Development and Cooperation, Federal Department of Foreign Affairs (Switzerland)

Cath Rylance, Global Head Anti-Corruption, Prosperity Fund, Foreign and Commonwealth Office (UK)

Kateryna Ryzhenko, TI Ukraine

W. L. R. Silva, Commissioner, Commission to Investigate Allegations of Bribery of Corruption, Sri Lanka

Guilherme Siqueira, TI Brazil

Elisavet Spitaki, TI EU

Lise Stenstrud, Policy Director on Anti-Corruption, NORAD (Norway)

Modibbo Ribadu Hamman Tukur, Director, Financial Intelligence Unit (NFIU), Nigeria

Gizo Uglava- First Deputy Director, NABU (Anti-Corruption Bureau of Ukraine)

JC Weliamuna, Head of the Presidential Task Force on Stolen Asset Recovery, Sri Lanka

Rose Whiffen, TI UK

UNODC

John Brandolino, Director, Division for Treaty Affairs

Jean-Luc Lemahieu, Director Division for Policy Affairs

Brigitte Strobel-Shaw, Chief of the Conference Support Section, Corruption and Economic Crime Branch, UNODC

Badr El Banna, Crime Prevention and Criminal Justice Office

Sophie Meingast, Crime Prevention and Criminal Justice Officer

Vladimir Kozin, Crime Prevention and Criminal Justice Officer

Felipe Freitas, Crime Prevention and Criminal Justice Officer

Andrea Agudelo, UNODC Colombia

David Alamos, UNODC Colombia

World Bank

Emily Rose Adeleke, Senior Financial Sector Specialist, Office of the Senior Global Director.

Jim Anderson, Lead Governance Specialist, Governance Global Practice

Alfonso Garcia Mora- StAR Management Committee Member, Global Director, Finance, Competitiveness & Innovation

Niraj Verma, Africa Regional Practice Manager

Ceyla Pazarbasioglu, Chair of the StAR Management Committee & Vice President for Equitable Growth, Finance and Institutions

Jean Pesme, former StAR Coordinator

Joel Turkewitz, Lead Public Sector Specialist, Governance Global Practice

Alexandra Habershon, Senior Governance Specialist, Governance Global Practice

World Bank StAR Team

Nigel Bartlett

Lisa Bostwick

Jean Pierre Brun

Emile van der Does de Willebois, Coordinator

Elsa Gopala Krishnan

Solvej Krause

Shervin Majlessi

Yira Mascaro, former StAR Coordinator

Laura Pop

Vikki W. Taaka

Keesook Viehweg

ANNEX 3: COUNTRY ENGAGEMENT AGGREGATE DATA

Country Engagements

List of countries StAR engaged with between 2013 and 2017. Data was extracted from the StAR Annual reports. Data from 2018 is pending. Engagements include capacity building (CB), case related (CR) activities, placing a mentor (MT). In some cases activity-type was not specified in the documents reviewed (NS). Exploratory discussions are labelled “ED”, a request is “Rq” and scoping missions are “SM”; “NAR” is no activity reported, which does not count towards yearly totals, while “X” means engagement was ended.

Country	2013	2014	2015	2016	2017
<i>Africa</i>					
Botswana	Rq	SM CB	CB	Rq CB	NAR
Burundi				Rq	NAR
Egypt	CB CR	CB X			
Ethiopia	Rq CB CR	NAR	NAR		
Gambia					Rq
Kenya	CB	NAR	ED	CB	NAR
Libya	Rq	NAR	NAR		
Nigeria		CR	NAR	Rq SM	CB
Rwanda	Rq	SM	NAR	NAR	
Senegal	MT	X			
Seychelles		Rq SM	NAR	NAR	
Somalia	Rq SM	CB	CB	CB	NS
South Sudan	CB CR	Rq SM			

Tanzania	CB	MT CB	CB	CB	CB
Tunisia	CR	CB	CB	CB	NS
Uganda	CB CR	SM CB CR	CB	CB CR	NS
<i>ME/Asia</i>					
Afghanistan				Rq	NAR
India	CB	NAR	Rq	NAR	NAR
Indonesia	Rq	NAR	NAR		
Iraq		ED	NAR	NAR	
Jordan		Rq	NAR	NAR	
Kazakhstan				Rq SM	NS
Kyrgyz Republic	CB CR	CB	CR	CB	NS
Mongolia	CB	CB	CB	CB	NS
Myanmar					CB
Sri Lanka			Rq SM	SM CR CB	MT
Timor-Leste				SM CB	NAR
Vietnam				CB	NAR
Yemen		Rq CB	NAR	NAR	
<i>Europe</i>					
Moldova	Rq	SM CB	Rq SM	CB	CR CB
Romania	CB	CB	CB CR	NAR	NAR

Ukraine		SM CR	SM CR	CB	NS
<i>Latin America</i>					
Argentina				Rq CB	SM CB
Bolivia	CB CR	CB CR	CR CB	CB	NAR
Chile	Rq	NAR	NAR		
Colombia	Rq	CB	CB Rq	CB	CB
Costa Rica	Rq	NAR	Rq CB	Rq CB	NS
El Salvador	Rq	CB	CB	Rq CB	NAR
Guatemala	Rq CB	NAR	Rq	Rq SM CB	CB
Guyana			Rq	SM CB	CB
Mexico					NS
Paraguay			Rq	SM	NS
Peru	SM	CB	CB	NAR	NAR
Total Active Countries/YR	25	22	21	25	20

➤ 33 different countries engaged with StAR to one degree or another during 2013-2017. There is no information available for 2018 yet.

Regional/Special Forums

Fora	2013	2014	2015	2016	2017
Arab Forum on Asset Recovery	<ul style="list-style-type: none"> Organized 3 Special Sessions facilitating 59 bi-laterals; Assisted in organizing 2nd Forum facilitating 81 bi-laterals; Compilation of CSO AR Guide; 	<ul style="list-style-type: none"> Continued compilation of CSO AR Guide; Assisted in organizing AFAR III facilitating 70 bi-lateral meetings; 	<ul style="list-style-type: none"> Special Session in May; IV Forum facilitating 40 bi-laterals; 		
The East African Magistrates and Judges Association (EAMJA)		<ul style="list-style-type: none"> CB (incorporated later into each country engagement); Engagement has concluded; 			
Ukraine Forum on Asset Recovery (UFAR)		<ul style="list-style-type: none"> Assisted in organizing Forum; Facilitated meetings; 			

Bay of Bengal Initiative for Multi-Sectoral Technical and Economic Cooperation (BIMSTEC)					<ul style="list-style-type: none"> • StAR delivered a workshop on international cooperation in AR;
Asia-Pacific Economic Cooperation (APEC)					<ul style="list-style-type: none"> • Co-organized a workshop on “Enhancing Cooperation Among Law Enforcement Authorities for Effective Asset Recovery” for the APEC Network on Anti-Corruption Authorities and Law Enforcement Agencies (ACT-NET) Meeting;

Global Forum on Asset Recovery (GFAR)					<ul style="list-style-type: none">• Four priority countries: Nigeria, Sri Lanka, Tunisia and Ukraine
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