Summary

The Office of Internal Oversight Services (OIOS) undertook a programme evaluation of United Nations Office on Drugs and Crime (UNODC) subprogramme 1, countering transnational organized crime, and subprogramme 2, a comprehensive and balanced approach to counter the world drug problem (with a focus on illicit drug trafficking issues alone). The evaluation covers the period from 2015 to 2019. The objective of the evaluation was to determine the relevance, effectiveness and efficiency of the subprogramme in delivering on their mandate.

UNODC was relevant in addressing transnational crime and illicit trafficking as the custodian of applicable conventions, their protocols and other instruments. The combination of its mandates and technical assistance were instrumental to engage with governments in policy discussions and undertake implementation on the ground. However, it did not fully exploit its comparative advantages owing to its programme structure and its funding model. These hampered the harmonization of its efforts and its agility in achieving results on the ground.

UNODC was effective in strengthening capacities of its counterparts in addressing cross-border crime and trafficking activities, although the scope and scale of effectiveness and sustainability were constrained by country contexts, cohesiveness in programming and funding. UNODC relevance, effectiveness and efficiency were influenced by limited integration of subprogrammes at the point of delivery and inadequate dovetailing with global, regional and country programmes. Overall, UNODC did not have a vertically or horizontally integrated approach to its programming.
UNODC made efforts to provide equal opportunities to female and male participants in capacity-building and in applying a gender lens to its programming. However, its programmes were not gender-transformative. To some extent, UNODC adopted a human rights approach by incorporating the rights of the victims in designing its programmes.

UNODC was viewed as the lead agency on Sustainable Development Goal 16. While a member of United Nations country teams, it had few instances of systematic collaboration with other agencies, because of asynchronous planning and funding cycles coupled with its limited presence on the ground.

OIOS made the following three important recommendations:

(a) Develop a strategic plan with concrete results to contribute towards the Sustainable Development Goals, including: a results framework depicting the organization’s theory of change, the organizational change strategies and enablers to drive results, a streamlined fundraising strategy and optimal staffing patterns between the headquarters and field offices;

(b) Ensure that its strategic plan incorporates full integration across themes and dovetailing with regional, global and country programmes to address national and cross-border needs and donor priorities while systematically incorporating gender and human rights considerations;

(c) Establish a clear road map of collaborations with United Nations agencies and other international organizations, to jointly contribute to the implementation of the Sustainable Development Goals at the country level and in line with national development plans.
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Introduction and objective</td>
<td>4</td>
</tr>
<tr>
<td>II. Background</td>
<td>4</td>
</tr>
<tr>
<td>III. Scope and methodology</td>
<td>8</td>
</tr>
<tr>
<td>IV. Evaluation results</td>
<td>9</td>
</tr>
<tr>
<td>A. Relevance: the activities of the United Nations Office on Drugs and Crime were relevant in addressing national, cross-border and international priorities in transnational organized crime and illicit trafficking, although extreme reliance on extrabudgetary and earmarked funding limited its ability to fully respond to priorities at the point of delivery</td>
<td>9</td>
</tr>
<tr>
<td>B. Effectiveness: the programming of the United Nations Office on Drugs and Crime contributed to strengthening capacities and developing legislation that responded to transnational organized crime and illicit trafficking, although systematic achievement and sustainability of intended outcomes were hampered by context, availability of resources and lack of cohesiveness in programming</td>
<td>12</td>
</tr>
<tr>
<td>C. Efficiency: the efficiency of the programming of the United Nations Office on Drugs and Crime in delivering results on the ground was hampered by limited dovetailing of its programmes, its funding model and administrative constraints</td>
<td>17</td>
</tr>
<tr>
<td>D. Cross-cutting: the effectiveness and efficiency of the United Nations Office on Drugs and Crime on the ground, as well as its comparative advantage in addressing transnational crime and illicit trafficking, were constrained by the absence of strategic vision in integrating its subprogrammes, limited collaboration with partners, as well as its organizational culture</td>
<td>21</td>
</tr>
<tr>
<td>V. Conclusion</td>
<td>23</td>
</tr>
<tr>
<td>VI. Recommendations</td>
<td>23</td>
</tr>
</tbody>
</table>

Annex

- Comments received from the United Nations Office on Drugs and Crime | 25 |
I. Introduction and objective

1. The objective of the evaluation by the Office of Internal Oversight Services (OIOS) of the United Nations Office on Drugs and Crime (UNODC) subprogramme 1 was to determine the relevance, effectiveness and efficiency of the Office’s subprogramme 1, countering transnational organized crime, along with subprogramme 2, a comprehensive and balanced approach to counter the world drug problem (with a focus on illicit drug trafficking issues alone). The topic emerged from a programme-level risk assessment described in the evaluation inception paper, and the evaluation was conducted in conformity with the norms and standards for evaluation in the United Nations system.  

2. The comments of UNODC management were sought, and its response is provided in the annex.

II. Background

A. History, mandate and governance

3. The mission of UNODC is to contribute to the achievement of security and justice for all by making the world safer from drugs, crime and terrorism. As stated in document ST/SGB/2004/6, UNODC was established to implement the Organization’s drug programme and crime programme in an integrated manner, addressing the interrelated issues of drug control, crime prevention and international terrorism in the context of sustainable development and human security. UNODC work in the two subject subprogrammes draws from a variety of mandates grounded in the following:

   (a) The international drug control conventions (1961, 1971 and 1988);

   (b) The United Nations Convention against Transnational Organized Crime (2000) and the Protocols thereto;

   (c) Special sessions of the General Assembly on the world drug problem, which include:

      (i) The Political Declaration and Plan of Action on International Cooperation towards an Integrated and Balanced Strategy to Counter the World Drug Problem (2009);


B. Main areas of work

4. The UNODC strategic framework for 2018–2019 is embedded in overall biennial plan and priorities of the General Assembly as programme 13. In the strategic framework, the following nine subprogrammes were identified: subprogramme 1, countering transnational organized crime; subprogramme 2, a comprehensive and balanced approach to counter the world drug problem; subprogramme 3, countering corruption; subprogramme 4, preventing terrorism; subprogramme 5, justice; subprogramme 6, research, trend analysis and forensics;
subprogramme 7, policy support; subprogramme 8, technical cooperation and field support; and subprogramme 9, provision of Secretariat services and substantive support to United National intergovernmental bodies.

C. **Programme impact pathway**

5. The programme impact pathway for subprogrammes 1 and 2 of UNODC is shown in figure 1.
Figure I

United Nations Office on Drugs and Crime programme impact pathway for subprogrammes 1 and 2 (countering transnational organized crime and the world drug problem)
D. Organizational structure

6. UNODC is headed by an Executive Director at the Under-Secretary-General level, who is accountable to the Secretary-General.

7. The Office consists of three substantive divisions – the Division for Operations, the Division for Treaty Affairs and the Division for Policy Analysis and Public Affairs – as well as one management and administrative division, the Division for Management. Each division is headed by a Director, who is accountable to the Executive Director. Subprogrammes 1 and 2 fall under the responsibility of both the Division for Treaty Affairs and the Division for Operations.

E. Resources

8. UNODC is subsumed under parts 16 and 23 of the United Nations Secretariat programme budget. The 2018–2019 proposed budget was $772.8 million. Extrabudgetary resources, which stood at $731.4 million (95 per cent), constituted the overwhelming portion of budget, with $41.4 million (5 per cent) from regular budget resources. Most of the extrabudgetary funding was tightly earmarked (special purpose), while unearmarked resources (general purpose) constituted a mere 1.2 per cent. The biennial budgets covering 2012 to 2019 are shown in figure II.4

Figure II
Source of programme budgets, 2012–2019
(Millions of United States dollars)

9. As at January 2020, UNODC had a presence in 81 countries, with 115 office locations globally, and 2,424 personnel (678 international and 1,746 local). It had 8 regional offices, 7 country offices, 94 project offices, 2 liaison and partnership

offices and 2 liaison offices. The Division for Operations managed all field offices and facilitated effective coordination between field offices and headquarters.

III. Scope and methodology

10. In the evaluation, subprogrammes 1 and 2 (with a focus on illicit drug trafficking issues alone) in the period 2015–2019 were assessed using the criteria of relevance, effectiveness and efficiency. Subprogrammes 1 and 2 absorbed important portions of the total UNODC programme budget (27 per cent and 34 per cent, respectively) (see figure III). The evaluation was focused on the following areas of transnational crime and illicit trafficking: (a) border security; (b) illicit drug trafficking and precursors; (c) trafficking in persons and smuggling of migrants; (d) cybercrime; and (e) money-laundering. The rationale for narrowing the scope of the evaluation was twofold: to assess substantive areas that were covered by most regional programmes and to increase specificity of findings, given resource constraints.

Figure III
Breakdown of budget by subprogramme and management functions

11. In the evaluation, a case study methodology was employed that included visits to eight field offices. Case selection ensured a diversity of resource levels and geographic locations and took into consideration security factors and the recency of other evaluations. The case studies completed were of the Country Office in Pakistan (a highly resourced country office), the Regional Office of Central Asia (an important regional office in Kyrgyzstan and Uzbekistan), the country offices in Latin America (including the Country Office in Colombia, a highly resourced country office), the Liaison and Partnership Office in Mexico and the Regional Office for Southern Africa (a less-resourced office in Namibia, South Africa and Zambia). In addition, interviews were conducted with staff and stakeholders at headquarters in Vienna.

---

12. The following methods were used in the evaluation:

(a) Desk review of UNODC publications, annual reports, evaluations, monitoring reports, programme documents, budget fascicles, websites, staffing tables, country studies, etc.;

(b) Stakeholder interviews and group discussions covering 236 individuals (48 per cent stakeholders and 52 per cent UNODC staff; 42 per cent women and 58 per cent men);

(c) Thirteen direct observations of training sessions (Mexico, Pakistan and South Africa), seminars (Kyrgyzstan), subcommission and coordination meetings (Uzbekistan), laboratories and equipment handover ceremonies (Kyrgyzstan and Uzbekistan);

(d) In the evaluation, standard assessment tools were used to document and code data from desk review documents. Content and comparative analysis were used for perceptual data from the stakeholder interviews and group discussions to identify response categories and patterns. Quantitative and qualitative data were triangulated from primary and secondary data sources.

Limitations

13. The present evaluation had the following limitations:

(a) The original list of cases included three other regions (East Africa, North Africa and South Asia) that were not completed owing to budget constraints, thereby limiting the external validity and generalizability of results to other UNODC regional programmes;

(b) To avoid duplication with the report of the Multilateral Organisation Performance Assessment Network, in the present evaluation, neither programme results frameworks nor the UNODC monitoring system across the case studies was examined;

(c) In the absence of systematic and reliable data on long-term outcomes and impact for the case studies, it was difficult to assess the effectiveness of the programme comprehensively. Intermediate outcomes were examined (see figure I) based on the triangulation of data from stakeholder interviews and group discussions, desk review and direct observations.

IV. Evaluation results

A. Relevance: the activities of the United Nations Office on Drugs and Crime were relevant in addressing national, cross-border and international priorities in transnational organized crime and illicit trafficking, although extreme reliance on extrabudgetary and earmarked funding limited its ability to fully respond to priorities at the point of delivery

The Office maintained its comparative advantage in preventing and combating transnational crime and illicit trafficking, although it was constrained in fully taking advantage of its added value due to funding constraints

14. Respondents were strikingly unanimous regarding the UNODC comparative advantage. The Office continued to offer clear added value in addressing transnational crime and illicit trafficking and was a key custodian of relevant conventions, protocols

---

6 The Multilateral Organisation Performance Assessment Network report was not received in time to be triangulated with OIOS findings.
and other instruments. The UNODC depth of experience and technical expertise, as well as its neutrality and substantive authority, enabled it to convene a wide range of stakeholders. The combination of its mandates and expertise positioned the organization uniquely to engage with governments in policy formation and implementation. In comparison, most respondents in the case studies believed that other United Nations and international organizations did not have such an advantage.

15. The UNODC field presence provided an important added value. However, the scale of its presence in various regions varied, depending on funding and donor priorities. That was evidenced by differences in the staff size, scope and resourcing of various project and programme offices, country offices and regional offices. Staff and stakeholders perceived that UNODC was not fully exploiting its comparative advantage (i.e., its convening power, technical expertise and depth of experience). That was attributed to a lack of, or a limited, field presence, while a large pool of staff was posted at the headquarters; reliance on extrabudgetary and earmarked funding; and a low regular budget (5 per cent). Under such conditions, UNODC had to balance requests from host countries with donor priorities. Competition for funds for global, regional and country programmes and projects among programme divisions at headquarters and regional and country offices promoted internal competition and conflict. That, in turn, prevented UNODC from fully exploiting its comparative advantage to offer more strategic and tailored technical assistance to Member States.

The Office’s programming in transnational crime and illicit trafficking was underpinned by empirical evidence using research on global trends; where funding was available, country-level evidence was generated

16. UNODC conducted research and trend analysis on drugs and crime at the global level to inform international policymaking in addressing global problems, in particular those of a transnational nature and produced a wide range of reports. Stakeholders appreciated the relevance and quality of UNODC data as a basis for developing policy, in particular statistics on drugs and crime.

17. While UNODC research and global reports provided important information on patterns of transnational criminal activity in particular regions and countries, country-level findings were not systematically produced. Country-level data were collected when donor interest and funding existed (e.g., the Centre of Excellence in Statistical Information on Government, Crime, Victimization and Justice in Mexico and the Integrated System for Illicit Crop Monitoring in Colombia) and when specifically requested by Member States.

---

7 Observations undertaken at the fifty-fourth session of the Subcommission on Illicit Drug Traffic and Related Matters in the Near and Middle East, held in Tashkent on 23–27 September 2019.

8 Such as the International Organization for Migration, the United Nations Development Programme (UNDP), the World Bank and the German Agency for International Cooperation.

9 The word “staff” encompasses all categories of personnel. In Southern Africa, UNODC had one regional office and five small project offices (between one and five staff). In addition to the regional office in Uzbekistan, the Regional Office for Central Asia had six programme offices (between 1 and 26 staff). The Country Office in Colombia had the largest number of staff (589). The Liaison and Partnership Office in Mexico had 154 staff.

10 As at January 2020, there were 569 staff at headquarters (395 international and 174 local personnel) working in all nine subprogrammes.

11 The Liaison and Partnership Office in Mexico conducted surveys of households, victims, police officers and others and collaborated with the National Institute of Statistics and Geography of Mexico to monitor, and publish a variety of independent statistics on crime and illicit crops.

12 In Colombia, the Integrated System for Illicit Crop Monitoring generated relevant data through multiple sources: monitoring using geographical information systems; surveys on crop cultivation, corruption and crime; and mechanisms to gather qualitative data on human trafficking.
18. Reports based on data from crop surveys in Afghanistan were published regularly and highly regarded. The programme office in Kyrgyzstan supported specific research, and programme designs occasionally reflected findings from specific studies, such as the needs assessment conducted in advance of the joint coordination meeting to establish border liaison offices. However, the influence of more extensive studies was not observed in the Regional Office for Central Asia or the Country Office in Pakistan.

19. In Colombia and Mexico, there was greater use of locally generated data and statistics, as well as of empirical evidence, in designing programmes. In both offices, data collection and statistics functions were very well resourced and generated accurate, up-to-date and systematic information and evidence for developing policy related to countering organized crime. On the other hand, one study showed that reliance on a single donor was a risk factor, given that the donor could withdraw its support, as in the case of the Country Office in Colombia, which relied on the Ministry of Justice of Colombia for funding of the Integrated System for Illicit Crop Monitoring.

20. Data collection and analysis were cross-cutting programme areas for the Regional Office for Southern Africa, yet there was neither available funding nor donor interest for the generation of evidence at the country level. Although some countries in the region, such as Zambia, produced annual reports on drug seizures, country-level needs assessments were conducted mostly as technical assistance by individual mentors and consultants. Furthermore, in the absence of strong partnerships with local organizations, UNODC could not draw upon community-level knowledge of criminal networks to inform its interventions and engagement with Member States. The Regional Office for Southern Africa relied predominantly on UNODC global reports and publications, government statistics and counterpart data in various areas of cross-border crime and trafficking, such as the South African Development Community (SADC) database on trafficking in persons and the Asset Recovery Inter-Agency Network for Southern Africa reports on money-laundering.

21. Given limited general funding in support of local research activities, UNODC was forced to align itself with donor priorities rather than country needs for evidence generation. It was revealed that UNODC data were largely used for information sharing, research and analysis, rather than for national policy planning. For example, data published by UNODC in annual opium surveys in Myanmar did not inform the rest of the programme.

The Office developed programmes in response to country priorities and context, subject to availability of funding

22. Overall, UNODC counterparts and OIOS desk review confirmed that UNODC programmes responded to country priorities. In Mexico, most programmes were

---

13 In Colombia, the Integrated System for Illicit Crop Monitoring provided evidence of the overlap between the gangs engaged in smuggling of migrants and drug cartels.


15 Mentors were technical experts who provided coaching to Member States.

16 Such as the Global Initiative Against Transnational Organized Crime and the Institute for Security Studies.

17 An informal network of prosecutors and investigators from 16 countries combating money-laundering.

18 Finding from Professional peer review of UNODC research function, final report, May 2018.

19 Ibid.


21 See UNODC, Final Independent In-Depth Evaluation of the Regional Programme for South-East Asia (Vienna, 2020).
designed and implemented under the aegis of the Merida Initiative, which encapsulated national priorities in countering transnational organized crime and illicit trafficking. Similarly, in Colombia, alternative development projects were enshrined in the 2016 peace agreement.

23. In Kyrgyzstan and Uzbekistan, the Regional Office for Central Asia and the programme office in Kyrgyzstan were well aligned with country priorities articulated in national reform road maps. However, such alignment was less evident in Pakistan, where neither government stakeholders nor UNODC staff were able to articulate how, and to what extent, UNODC programmes fit into priority areas of the Government of Pakistan. Instead, stakeholders reported that programming was determined through a general congruence of country needs and donor priorities and, to a lesser extent, the strategic vision of UNODC.

24. The Regional Office for Southern Africa worked closely with SADC members to respond to regional concerns regarding the areas of organized crime and illicit trafficking and to promote ownership and cross-border collaboration. However, the Regional Office had not implemented interventions on drug trafficking or on urban crimes, although both areas were programme components. The gaps were attributed to an absence of adequate funding. In addition, Regional Office stakeholders mentioned a lack of strategic programming and a general practice of following only donor priorities.

B. Effectiveness: the programming of the United Nations Office on Drugs and Crime contributed to strengthening capacities and developing legislation that responded to transnational organized crime and illicit trafficking, although systematic achievement and sustainability of intended outcomes were hampered by context, availability of resources and lack of cohesiveness in programming

The Office contributed to tangible results in preventing and combating transnational crime and illicit trafficking, although the degree of effectiveness and sustainability varied according to context, resources and cohesiveness in programming

25. UNODC contributed to strengthening international and cross-border cooperation and collaboration through multilateral agreements (e.g., the Merida initiative); memorandums of understanding (e.g., the SADC and UNODC memorandums of understanding, the Great Mekong memorandum of understanding and the memorandum of understanding between the Governments of Tajikistan and Uzbekistan); joint programmes and training with other United Nations agencies (e.g., collaboration with the International Organization for Migration in Kyrgyzstan and Southern Africa); institutional partnerships (e.g., between UNODC and the World Customs Organization Container Control Programme, the Asset Recovery Inter-Agency Network for Southern Africa and SADC, as well as between the World Bank and the individual Departments of Agriculture of Afghanistan, Colombia and Myanmar on alternative development projects); donors; and, to a lesser extent,

---

22 Alternative development projects targeted small rural farmers involved in illicit crop cultivation.
23 See OIOS, Audit of the UNODC operations in Pakistan 2016–2018, report 2018/122, December 2018. Findings consistent with those in an OIOS audit of the Country Office in Pakistan, through which the need to strengthen strategic planning and project management aspects was identified.
24 The Ministerial Committee of the Southern African Development Community consults with respective countries to inform the regional programme document.
25 Based on the 2013–2020 regional programme. In the regional programme document, the Regional Office for Southern Africa programming pillars spanned several substantive areas, but their annual implementation was subject to availability of funding.
non-governmental organizations. In Central Asia, the Central Asian Regional Information and Coordination Centre for combating the illicit trafficking of narcotic drugs, psychotropic substances and their precursors was a key mechanism for ensuring cross-border cooperation.\(^{26}\)

26. Overall, donor, counterpart and staff assessment of the effectiveness of UNODC activities was positive. Respondents felt that UNODC was successfully addressing national capacity gaps in responding to transnational crime and illicit trafficking. They viewed the combination of technical trainings and workshops, coaching and mentoring, tools and guidelines, awareness-raising campaigns and assistance in formulating legislation and regulatory frameworks as important mechanisms for achieving results. Stakeholders confirmed that UNODC capacity-building efforts had been invaluable in increasing skills and knowledge among law enforcement, immigration and border control officials and the judiciary and provided an important vehicle for coordination across departments and among Member States. Although UNODC was not the sole actor in this field, in all cases, there was evidence of its contribution, including the revision of legislation and policies, data collection and monitoring systems, drug seizures, the establishment of asset forfeiture units, an increase in amount of assets seized, a reduction in the cultivation of illicit crops and the detection of human trafficking and convictions in cases thereof. The table below provides examples of UNODC achievements identified by interviewees.

27. Several challenges influenced the scale and scope of results achieved on the ground, including political stability and political will, the development stage and capacity of countries, cultural norms, trust, coordination and collaboration (i.e., among relevant ministries, law enforcement agencies and the judiciary within countries, as well as among countries at the regional level), cohesiveness in programming and funding.\(^{27}\) Respondents stated that UNODC lacked sufficient visibility, except to its direct counterparts, owing to its relatively scant presence in some regions and countries, the sensitive nature of its work and the absence of communications and advocacy strategies at headquarters and field offices.

28. Counterparts and staff considered political will and government commitment to be critical to effective implementation. For example, in the context of the national Government’s economic priorities, the anti-money-laundering partnership between UNODC and the Securities and Exchange Commission of Pakistan was successful in improving that country’s assessment by the Financial Action Task Force. In Uzbekistan, the Government’s increased openness towards the United Nations and other organizations was viewed as a significant catalyst for regional cooperation.

29. Political instability hindered the achievement of results. A deterioration in security throughout project sites in Colombia, and changes in government in both Colombia and Mexico in 2018, resulted in a shift in national priorities. Institutional memory was eroded in both instances as a corollary to staff exodus, which affected the continuity of UNODC programmes. Desk review findings indicated that, while regional programmes attracted donor support, the sustainability of country programmes fell short owing to political and economic instability, among other factors.\(^{28}\)

30. Uneven institutional capacity and resources across countries had an impact on results at the regional level. For example, in the Regional Office for Southern Africa, the cost of the goAML\(^{29}\) license, notwithstanding differential pricing, was deemed expensive.

\(^{26}\) A network for sharing intelligence across borders established in 1996 among seven Central Asian Republics, the Russian Federation and UNODC.

\(^{27}\) It was not possible to measure the impact of those factors on effectiveness and sustainability.

\(^{28}\) UNODC, *Final Independent In-Depth Evaluation of the Regional Programme for South-East Asia.*

\(^{29}\) goAML, an anti-money-laundering software application used in financial crime investigations, was developed by UNODC.
by some countries. Similarly, SADC members applied resources unevenly towards the SADC trafficking in persons database, which jeopardized data reliability and timeliness.

**Achievements of the United Nations Office on Drugs and Crime identified by interviewees**

<table>
<thead>
<tr>
<th>Case studies</th>
<th>Achievements</th>
<th>Link to programme impact pathway outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Southern Africa</td>
<td>Development of SADC regional data management of trafficking in persons and goAML</td>
<td>Prevent and counter trafficking in persons, smuggling of migrants and money-laundering</td>
</tr>
<tr>
<td></td>
<td>SADC data facilitated better understanding of the magnitude of forced labour in cases of trafficking in persons; in South Africa, forced labour cases identified nearly doubled in one year</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Asset Recovery Inter-Agency Network for Southern Africa as a successful platform for strengthening cooperation and exchange of information on anti-money-laundering was exported to regions including West and Central Asia, the Asia-Pacific region and the Caribbean</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Increase in total assets seized by Member States in the Asset Recovery Inter-Agency Network for Southern Africa amounted to $1 billion</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime: most SADC countries had criminalized trafficking in persons by 2018</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Trafficking in persons trainings enhanced monitoring skills, analysis and exchange of data, leading to greater identification and prosecution in cases of trafficking in persons</td>
<td></td>
</tr>
<tr>
<td>Colombia</td>
<td>Report on illicit crop cultivation treated as the gold standard, driving drug control policies of Colombia and the United States of America</td>
<td>Prevent and counter drug trafficking</td>
</tr>
<tr>
<td></td>
<td>Through the alternative development programme, 37,000 ha of coca were eradicated and approximately 100,000 families supported</td>
<td></td>
</tr>
<tr>
<td>Mexico</td>
<td>Centre of Excellence in Statistical Information on Government, Crime, Victimization and Justice being replicated in the Republic of Korea</td>
<td>Prevent and counter drug trafficking, trafficking in persons and smuggling of migrants</td>
</tr>
<tr>
<td></td>
<td>Regional project for gathering crime and victim statistics covering 19 countries in Latin America and the Caribbean</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Established international standards on crime statistics with the United Nations Economic Commission for Europe</td>
<td></td>
</tr>
<tr>
<td>Central Asia</td>
<td>Contributed to an increased number of seizures of narcotics and victims of trafficking through support provided to border liaison offices</td>
<td>Prevent and counter drug trafficking, trafficking in persons and smuggling of migrants</td>
</tr>
<tr>
<td></td>
<td>Facilitated the establishment and strengthening of inter-agency mobile teams to improve coordination in drug seizures and with regard to trafficking in persons</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Strengthened cross-border cooperation towards combating drug trafficking and trafficking in persons through the Central Asian Regional Information and Coordination Centre</td>
<td></td>
</tr>
</tbody>
</table>

---

30 It was not possible for the evaluation team to verify the accuracy of the examples.
<table>
<thead>
<tr>
<th>Case studies</th>
<th>Achievements</th>
<th>Link to programme impact pathway outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kyrgyzstan</td>
<td>Strengthened international cooperation through the Subcommission on Illicit Drug Traffic and Related Matters in the Near and Middle East</td>
<td>Prevent and counter drug trafficking</td>
</tr>
<tr>
<td></td>
<td>Support provided to the Counter-narcotics Service helped to establish two forensics laboratories to facilitate timely analysis of seized substances</td>
<td>Prevent and counter drug trafficking</td>
</tr>
<tr>
<td></td>
<td>Conducted targeted and effective awareness-raising campaign on trafficking in persons</td>
<td>Prevent and counter trafficking in persons</td>
</tr>
<tr>
<td></td>
<td>Supported research on institutional responses to victims of trafficking</td>
<td>Prevent and counter trafficking in persons and smuggling of migrants</td>
</tr>
<tr>
<td></td>
<td>Supported gender mainstreaming efforts of Ministry of Interior of Kyrgyzstan</td>
<td>Gender mainstreaming</td>
</tr>
<tr>
<td>Pakistan</td>
<td>Contributed to national legislation to address trafficking in persons and smuggling of migrants</td>
<td>Prevent and counter trafficking in persons and smuggling of migrants</td>
</tr>
<tr>
<td></td>
<td>Research capacity of Federal Investigation Agency strengthened through long-term capacity-building support</td>
<td>Prevent and counter drug trafficking, trafficking in persons, smuggling of migrants and money-laundering</td>
</tr>
<tr>
<td></td>
<td>Supported several national agencies in strengthening financial policies and standard operating procedures, resulting in improved financial risk ratings</td>
<td>Prevent and counter money-laundering</td>
</tr>
</tbody>
</table>

31. Other challenges to achieving results included cultural norms and customary practices. Evidence from Southern Africa showed that, in some instances, it was difficult to stop cross-border trafficking in children for labour because it was a customary practice in the local community. At times, immigration officers showed leniency towards traffickers or failed to protect victims.

32. Although UNODC was instrumental in convening various actors within the criminal justice system and law enforcement, as well as Member States within regions, evidence showed that challenges persisted. In Southern Africa, results were impeded by an absence of trust and collaboration among officials from different institutions (e.g., police, prosecutors, judges, immigration and customs). Moreover, in some instances, a lack of trust among Member States hampered the exchange of information and resulted in countries working in silos. In the Regional Office for Central Asia, staff reported that their long-standing investment in enhancing trust and collaboration among government counterparts across Member States had only recently begun to achieve results.

33. In some cases, it was observed that cohesiveness in programming and implementation contributed to effectiveness and sustainability, such as in the Blue Heart Campaign against Human Trafficking in Mexico, which was used as the template for an anti-money-laundering campaign within Mexico and was exported to other countries. However, in its absence, there was less evidence of effectiveness and sustainability. For example, the alternative development projects in Myanmar did not
incorporate the necessary mechanisms that would have ensured better results, such as farmers’ cooperatives, roads and security, before signing up the beneficiaries.31

34. Funding played a key role in ensuring effectiveness and sustainability. For example, the Country Office in Colombia, as the best-resourced country office in Latin America, supported neighbouring countries, such as Argentina, Bolivia, Brazil and Peru, through the sharing of information and lessons learned. The Country Office in Colombia was the regional focal point for the Stolen Asset Recovery Initiative with the World Bank (asset forfeiture). On the other hand, results tended to dissipate in the absence of continued funding. In Kyrgyzstan, State agencies continued to rely on UNODC for the provision of chemical reagents and equipment to maintain operations in counter-narcotics laboratories that the Office had helped to establish. In the Country Office in Pakistan, where a new phase of funding was imminent, several government counterparts expressed concern about the hiatus in support and consequent uncertainty regarding their partnership with UNODC, and were even wary of the sustainability of the results achieved.

The Office addressed gender equality and human rights-based approaches within its programmes to a limited extent, despite challenging political and cultural contexts

35. UNODC engaged on gender issues through policy and legislative discussions and provided the same opportunities to women and men to participate in its activities. However, there was scant evidence from case studies and secondary sources that the interventions were gender-transformative.32 In Kyrgyzstan, UNODC had a long-term engagement with the Ministry of Interior supporting the gender mainstreaming of the police. It partnered with the Kyrgyz Association of Women Judges, providing support for a study on female offenders. Victim-centred approaches in legislation on trafficking in persons and the smuggling of migrants were adopted in Pakistan and Uzbekistan. In Colombia, alternative development programming attempted to bring a gender perspective to some of its projects, for example by setting up women’s cooperatives and addressing the needs of women-led families. However, stakeholders viewed many of the activities as falling short with regard to providing women with necessary skills.

36. Overall, UNODC efforts towards achieving gender balance in training sessions and workshops met with limited success, given the overwhelmingly male-dominated nature of the target institutions.33 Staff and stakeholders agreed that UNODC focused on national capacity-building in the protection of trafficked women and children. In Southern Africa, the Office brought police officers together with members of the judiciary to develop a regional strategy to tackle gender-based violence. UNODC relied on Member States to uphold gender equality across various ranks of law enforcement officers and the judiciary. Donor interests contributed to the extent of focus on gender issues. For example, in the Liaison and Partnership Office in Mexico, the major donor preferred to concentrate on fighting organized crime in the project on the smuggling of migrants. Nevertheless, trainings incorporated elements of raising the awareness of law enforcement officials with regard to responding to victims of sexual assault and transgender victims.

31 UNODC, “Mid-term independent project evaluation: sustainable livelihoods and development in Myanmar 2014–2019”.
32 Ibid.
33 Training workshops observed in the Regional Office for Southern Africa had balanced gender participation. In contrast, the training on illicit crop eradication observed in Mexico included only male participants.
37. On an ad hoc basis, UNODC addressed human rights on the basis of donor interest and host country support. In such cases, UNODC engaged with Member States by incorporating the rights of the victims and suspects into its training activities. That was evidenced in its victim-centred programming, which was focused on both the number of victims rescued and supported and the volume of drugs seized or traffickers convicted. In the Regional Office for Southern Africa and the Country Office in Pakistan, UNODC provided technical assistance in developing legislation to ensure that the rights of victims of trafficking were upheld.

C. Efficiency: the efficiency of the programming of the United Nations Office on Drugs and Crime in delivering results on the ground was hampered by limited dovetailing of its programmes, its funding model and administrative constraints

There was limited evidence of dovetailing with global, regional and country programmes, except where there was some level of co-funding

38. Effective harmonization across levels of programming, such as between the global Container Control Project and the Regional Office for Central Asia programmes, or between the global anti-money-laundering and trafficking in persons projects in Southern Africa and the Regional Office for Southern Africa programmes, resulted in economies of scale. However, there was limited evidence of systematic dovetailing with global, regional and country programmes, except where there was some level of co-funding. Across all case studies, government stakeholders highlighted the need for greater integration across levels of programming.

39. Harmonization was impeded by competition for finances and audience, in addition to impeded communication among managers of global and regional programmes. Global programmes, typically administered by headquarters, relied on field offices to provide services outside their regular scope of activities. Some donors and staff reported that global programmes tended to have better results because of the streamlined management of activities and robust technical expertise, while others cited several constraints imposed by their funding. The constraints included a lack of flexibility; an inability of regional representatives to determine how to allocate funds; a lack of transparency in spending; divergent reporting lines, which, at times, created friction among staff; and the inefficient utilization of funds by locating staff in Vienna instead of field offices. Staff in Mexico and Southern Africa pointed to gaps in coordination and communication between global programmes and field offices; at times, headquarters staff participated in meetings or conferences in the country without informing local focal points.

40. Respondents specified that it was difficult to maintain a balance between donor and country priorities and to achieve the effective integration of global, regional and country programmes. In Central Asia, the geographical overlap of the Regional Programme for Afghanistan and Neighbouring Countries and the Regional Office for Central Asia, as well as ambiguity in discrete substantive mandates, created inefficiencies in programming. Several stakeholders, including senior management,

34 For example, the global and regional programmes on anti-money-laundering in Southern Africa.
35 For example, between the Regional Programme for Afghanistan and Neighbouring Countries and the Regional Office for Central Asia, between the Regional Office for Central Asia and the programme office in Kyrgyzstan and between the framework of Pakistan’s Action to Counter Terrorism and the Country Office in Pakistan.
36 In the field, the work of the Regional Office for Central Asia in subprogrammes 1 and 2 was often related to countering the trafficking of illicit substances, thus overlapping with the Regional Programme for Afghanistan and Neighbouring Countries in substantive mandate as well.
reported that the overlap created competition for funding and poor internal communication. The perception at headquarters, however, was that the Regional Programme and the Regional Office had a discrete set of functions: the Regional Programme facilitated regional collaboration in the trafficking of narcotics and illicit substances, while the Regional Office harnessed the shared economic, social and institutional trajectories of Member States in Central Asia.

41. In Mexico, several staff reported a lack of a regional approach to Central American countries owing to limited cooperation with the Regional Office for Central America and the Caribbean in Panama. Furthermore, notwithstanding donor interest in a project to prevent human trafficking in indigenous communities, neither the donor nor staff knew how to dovetail the project with the Liaison and Partnership Office in Mexico programme.

42. Global programmes faced limitations in harmonization because they were aligned with donor priorities and not necessarily with individual country needs. Harmonization between the headquarters and field offices was lacking because, in being responsive, field offices sometimes committed themselves to programmes that headquarters did not have the expertise to support, although the trade-off was the agility and responsiveness to meet local needs.

43. Regional budgets allowed programme managers greater flexibility than global programmes. While there was limited flexibility to realign programmes, given donor agendas, both the Regional Office for Central Asia and the Regional Office for Southern Africa invested in relationships with donors to build on existing work and address perceived gaps. One benefit of global programmes was the ability to leverage technical expertise from programmes with relatively longer-standing donor support. However, it was perceived that the cost of hiring experts in Vienna was higher than in field offices, and those experts were often unfamiliar with local dynamics, which led to frustration among field office staff.

The Office had limited flexibility and agility due to its funding model and numerous administrative constraints

44. The Office’s agility in programming, as well as its adaptability to changing contexts, was limited by its funding model, which included a large proportion of special purpose funds dedicated towards time-sensitive, project-based activities (see figure IV). As previously noted, the Regional Office for Southern Africa lacked a much-needed component on illicit drug trafficking and urban crime owing to funding limitations. Similarly, the Country Office in Pakistan was compelled to focus on antiterrorism programmes notwithstanding counterparts’ keenness to tackle illicit drug trafficking. The Liaison and Partnership Office in Mexico found it difficult to operationalize its thematic work, given its heavy reliance on a single donor. Overall, the UNODC funding model was based on field offices being fully reliant on the extrabudgetary resources that they raised. The short-term nature of funding – arising largely from donor preference and compounded by political and economic factors – reduced programme agility.
45. In Central Asia and Southern Africa, staff felt that annual workplans within the framework of the regional and country programmes provided some flexibility to adapt to changing needs and context, but there was no evidence of logical frameworks or risk assessments with mitigation measures to allow for adaptability. Reliance on a limited number or single major donor entailed other risks that reduced flexibility. As indicated in figure V, 49 per cent to 66 per cent of UNODC funds came from just three donors. For example, in the Liaison and Partnership Office in Mexico, the donor considered UNODC to be more of an implementing partner than a principal actor designing its own programme. Similarly, in Colombia, respondents felt that growth in the office’s pool of donors would enhance longer-term planning. Overall, although staff attempted to synchronize donor focus with country needs, the programme remained tethered to donor priorities. That, in turn, restricted the extent to which programme managers could integrate work across subprogrammes, harmonize global programmes with regional or country ones and strategically design interventions.  

[See UNODC, “Mid-term evaluation of Paris Pact Initiative Phase IV: a partnership to combat illicit traffic in opiates originating in Afghanistan”, evaluation report, October 2018. Findings are consistent with those therein.]
Donors, counterparts and staff confirmed that the administrative arrangements for procurement and staffing derived from the United Nations Secretariat, which UNODC was obligated to follow, were bureaucratic and inefficient for field office operations. From headquarters perspective, reforms to procurement processes introduced since 2019 challenged the provision of an agile response to country needs. Human resource services provided by the United Nations Development Programme (UNDP) were intended to enhance efficiency, but, in practice, the quality of service varied. Findings from case studies and secondary sources revealed bottlenecks in implementation owing to headquarters approval requirements. In Mexico, the major donor perceived a lack of urgency and efficiency in decision-making, attributed to patchy coordination between the Liaison and Partnership Office in Mexico and headquarters. Staff in the Regional Office for Central Asia reported that equipment sometimes depreciated by the time approvals for its release were granted. On the other hand, in some cases, such as that of the programme office in Kyrgyzstan, stakeholders felt that UNODC was flexible and generally responded in a timely fashion.

Umoja was seen as a tedious system taking up an inordinate amount of management and staff time to carry out procurement, travel and payments. Staff complained about the inflexibility of related processes, which delayed the implementation of activities. The perception was validated by secondary sources. Although Umoja was designed to promote greater accountability and transparency, it was not necessarily tailored to field realities.

An absence of adequate delegation of authority to field offices was an issue. Across the case studies, staff complained that the offices were unable to complete simple procurement, administrative and finance procedures owing to inadequate delegation of authority. They pointed out that, in many instances, the field offices’ level of accountability exceeded their level of authority, making it difficult to deliver expected results efficiently.

---

38 UNODC, Final Independent In-Depth Evaluation of the Regional Programme for South-East Asia.
D. Cross-cutting: the effectiveness and efficiency of the United Nations Office on Drugs and Crime on the ground, as well as its comparative advantage in addressing transnational crime and illicit trafficking, were constrained by the absence of strategic vision in integrating its subprogrammes, limited collaboration with partners, as well as its organizational culture.

There was limited evidence of integration at the point of delivery, reducing effectiveness and efficiency.

49. Stakeholders considered integration across subprogrammes from two perspectives: (a) the extent to which projects were coherently assimilated under discrete subprogrammes; and (b) adequate linkages across the subprogrammes in a given office.

50. In reference to the extent to which projects were coherently assimilated under discrete subprogrammes, donors and staff alike reported that donor policy did not support an integrated approach, although they agreed that potential efficiencies may be attained if substantive institutional agreements could cover multiple areas of work.

51. Counterparts and staff articulated the importance of linkages across subprogrammes. Respondents considered criminal activities to be interrelated, highlighting the need for integration across thematic pillars for greater efficiency and effectiveness. For example, in Colombia, organized gangs had diversified into the illegal mining of gold as a more lucrative activity than illicit crop cultivation.

52. Staff considered the funding model to be a constraint to integration at the point of delivery, while donors believed that UNODC needed to pay closer attention to ensuring interlinkages. The same concern was voiced by respondents from headquarters, who believed that divisions often worked independently, without sufficient information-sharing.

Although the Office demonstrated some coordination with partners and stakeholders in contributing to the Sustainable Development Goals, it missed opportunities for greater collaboration, which reduced effectiveness and efficiency.

53. UNODC was acknowledged by donors, counterparts and staff as being the lead agency on Goal 16, but also contributing to Goals 5, 8, 10, 11 and 15. Few instances of systematic collaboration between UNODC and other agencies were observed across case studies. It was generally recognized that United Nations agencies viewed one another as competitors for donor funding. Resident Coordinators described the potential for a more prominent role of UNODC on the United Nations country teams. However, asynchronous planning and funding cycles, as well as divergent results frameworks, prevented closer collaboration. Some Resident Coordinators felt that there were limitations to active collaboration in the absence of common operational mechanisms.

54. In all of the case studies, government stakeholders highlighted the need for better coordination within UNODC and across the system more broadly to allow for the effective resource utilization. Internally, there was a perception of potential dilution of focus if UNODC were to become a more active member of the United Nations country team, in particular given the size differential between UNDP and UNODC. In one case study, staff felt that it was difficult to work with other agencies in anti-money-laundering because of agency-specific mandates, with the relevant Conventions applying only to UNODC.

55. The Liaison and Partnership Office in Mexico, the Regional Office for Central Asia and the Regional Office for Southern Africa were the main coordinators of Goal 16 in their respective United Nations country teams. However, in the Regional Office for
Central Asia and the Regional Office for Southern Africa, there was no evidence of specific inter-agency efforts. Mexico was one of the few countries in which UNODC was part of the European Union-funded Spotlight Initiative to eliminate violence against women and girls, working with UNDP, the United Nations Entity for Gender Equality and the Empowerment of Women, the United Nations Population Fund and the United Nations Children’s Fund. In addition, the Latin American and the Caribbean Crime Victimization Survey Initiative generated data for four Sustainable Development Goal indicators. Some efforts to improve internal collaboration across the thematic pillars, however, resulted in increased bureaucracy. For example, the restructuring of the Liaison and Partnership Office in Mexico office to create a programme office promoting cross-thematic interaction and knowledge-sharing resulted in increased bureaucracy in the form of internal meetings and the filling out of forms, thereby reducing the amount of time available for programme work.

The Office’s organizational culture impeded the effective and efficient delivery of programmes on the ground

56. UNODC offered technical expertise and neutral facilitation at the regional level. Respondents in Mexico considered the Liaison and Partnership Office in Mexico as promoting innovation and as an incubator for new ideas and campaigns. However, the organizational culture was viewed as siloed, rather than integrated. For example, respondents noted few interlinkages and a limited exchange of information among divisions at headquarters regarding programming, financial management and human resources, with implications for programme design and implementation. The foregoing was attributed to an absence of an overarching organizational strategy and vision and specific guidance from leadership.

57. The relationship between headquarters and field offices and between regional hubs and programme offices was a concern. Staff and partners noted a highly centralized and bureaucratic culture emanating from headquarters, with stymied information-sharing, approvals required at every stage and inordinate delays in implementation. At headquarters, staff criticized the lack of vision of senior leadership at the headquarters and regional levels and siloed and competitive approaches among subprogrammes as a corollary of the funding model. Staff in the Country Office in Colombia noted that UNODC did not promote dispersed expertise across all countries in the region.

58. Staff viewed the absence of an internal or external communication strategy as leading to a lack of clarity of roles and mistrust across the organization. A staff member noted that the relationship between field office and headquarters depended on personality and management style. If management and the team did not understand each other, the relationship and support offered by headquarters fell short. Staff in field offices were affected by insecure funding, short-term contracts with limited benefits and the perception that field offices were responsible for supporting headquarters costs. For example, in the programme office in Kyrgyzstan and the Regional Office for Southern Africa, staff complained about employment insecurity and an absence of career opportunities. Most senior managers in the organization were men, which was viewed as perpetuating a male-dominated culture. An internal review of gender parity in the Liaison and Partnership Office in Mexico found that, notwithstanding a large number of female employees, a significant gender gap in salaries existed.

39. Such as the Blue Heart Campaign against Human Trafficking and the methodologies created by the Centre of Excellence in Statistical Information on Government, Crime, Victimization and Justice in Mexico.

V. Conclusion

59. The contribution of UNODC to strengthening the capacities of its counterparts in addressing cross-border crime and illicit trafficking activities was undeniable. Its efficiency, effectiveness and sustainability were, however, undermined by an absence of adequate interlinkages among global, regional and country programmes and of integration of subprogrammes at the point of delivery. Furthermore, effectiveness and sustainability were reduced without cohesiveness in programming.

60. UNODC had a unique opportunity to engage with Member States in policy discussions and implementation on the ground through its mandates and technical assistance, in addition to its convening power. Notwithstanding its comparative advantage, UNODC did not fully exploit the opportunity owing in part to its organizational structure and culture, absence of strategic vision and limited integration and in part to its funding model. Those factors inhibited UNODC from promoting internal synergies in its programming and sustaining a balance between donor and country priorities. Consequently, at times, it was forced to subordinate country priorities to donor interests to secure extrabudgetary funds. That, in turn, had an impact on the harmonization of efforts and agility in achieving results on the ground.

61. Notwithstanding its being a member of the United Nations country team and the lead agency on Goal 16, UNODC had few instances of systematic collaboration with other agencies, owing in part to asynchronous planning and funding cycles and in part to its limited visibility and presence on the ground. UNODC could be more adept at attracting funds for joint programming with other organizations, both geographically and by intervention, with an effective communication and advocacy strategy at headquarters and in the field.

VI. Recommendations

62. OIOS makes three important recommendations.

Recommendation 1

63. UNODC should develop a strategic plan with concrete results (outputs, outcomes, impact) to be achieved in contributing towards the attainment of the Sustainable Development Goals. The strategic plan should contain a results framework depicting the organization’s theory of change and the organizational change strategies and enablers to drive results (including a streamlined fundraising strategy and optimal staffing patterns between the headquarters and field offices).

Indicators of achievement: (a) a strategic plan, including a resource mobilization plan and a collaborative road map for fundraising between headquarters, regional offices and country offices; (b) a results framework encompassing theory of change, specific outcome and impact indicators and contributions to the Sustainable Development Goals; and (c) a robust organizational monitoring system tracking results at the output, outcome and impact levels

Recommendation 2

64. UNODC should ensure that its strategic plan incorporates full integration across themes, and regional, global and country programmes, to address national and cross-border needs and donor priorities while systematically incorporating gender and human rights considerations.

Indicators of achievement: (a) evidence of sound research underpinning the various programmes; (b) evidence of thematic integration and dovetailing with global, regional and country programmes; and (c) evidence of systematic incorporation of gender and human rights considerations into programme design, implementation and reporting
Recommendation 3

65. UNODC should establish a clear road map of collaboration with United Nations agencies and other international organizations, in accordance with their respective mandates, that builds on each other’s strengths and comparative advantage to jointly contribute to the implementation of the Sustainable Development Goals at the country level and in line with national development plans (or the United Nations Sustainable Development Cooperation Framework, where available).

Indicator of achievement: evidence of partnerships, joint activities and joint financing with other United Nations agencies and international organizations in the field, disaggregated according to contribution to the Sustainable Development Goals

(Signed) Fatoumata Ndiaye
Under-Secretary-General for Internal Oversight Services
March 2021
Annex*

Comments received from the United Nations Office on Drugs and Crime

The United Nations Office on Drugs and Crime (UNODC) would like to extend its gratitude to the Office of Internal Oversight Services (OIOS) for the opportunity to provide comments on the above-mentioned report. UNODC fully acknowledges the importance of this evaluation and values the consultative and transparent approach throughout the evaluation process.

UNODC appreciates the findings regarding its relevance in addressing transnational crime and illicit trafficking, its effectiveness in strengthening capacities of its counterparts, as well as being identified as the lead agency for Sustainable Development Goal 16. Note is further taken with gratitude on the evaluation highlighting UNODC’s comparative advantage in preventing and combating transnational crime and illicit trafficking, as well as the fact that UNODC’s work was underpinned by empirical evidence, using research on global trends. Moreover, UNODC recognizes that OIOS identified the reliance on extra-budgetary and earmarked funding as a limiting factor for UNODC’s ability to fully respond to priorities at the country level.

UNODC has carefully studied the report and confirms that the findings and recommendations will further support UNODC’s institutional development work, including several ongoing initiatives by UNODC senior management in 2020.

UNODC would however like to reiterate that the findings relating to Umoja seem to be unfounded given that no specific issue has been highlighted. Over the past years, experience further shows that many Umoja issues in field offices are rather policy or procedural than system issues. Moreover, in line with recent developments (February 2020) the delegation of procurement authority up to $100,000 was granted to UNODC field offices.

UNODC acknowledges the limitations of the evaluation as identified by OIOS (e.g. three regions that were not visited due to budgetary constraints and lack of systematic examination of programme logical frameworks). Considering these limitations and the fact that OIOS focused exclusively on subprogramme 1 and subprogramme 2 (focusing on illicit drug trafficking), the recommendations on the overarching strategy of UNODC and its operating model however seem to be beyond the initial scope of this evaluation.

Despite this, UNODC concurs with the recommendations of the report and the related overall perspectives. The responses below form part of a larger UNODC recommendation action plan and provide examples of how the recommendations will be utilised. In this context, UNODC will seek the support of Member States in advancing their implementation.

Recommendation 1: UNODC accepts this recommendation. An organization-wide strategy, fully considering the points raised by this evaluation, is already under development. Depending upon the context and resources available, some or all of the components highlighted by OIOS will be implemented. However, UNODC may not be able to fully comply with the request for optimal staffing patterns between headquarters and field offices. Maintaining flexible and responsive programming at

* In the present annex, the Office of Internal Oversight Services sets out the full text of comments received from the United Nations Office on Drugs and Crime. The practice has been instituted in line with General Assembly resolution 64/263, following the recommendation of the Independent Audit Advisory Committee.
the national, regional and global levels limits the ability to predetermine and maintain consistent staffing levels.

**Recommendation 2**: UNODC accepts this recommendation. The new strategy, which is currently under development, will be designed along both thematic and geographical axes. It will be based upon a variety of evidence including a situational analysis, as well as further enhance the internal cooperation of UNODC’s projects and programmes. The Implementation of this Strategy will be done through developing Results Frameworks that are part of UNODC programmes at all levels. The strategy will triangulate the articulated needs of the development partners, the priorities of the donors, research data and analysis, as well as other evidence produced by UNODC. Moreover, gender equality considerations are systematically included in the development of all programmes. UNODC will continue integrating the protection and promotion of human rights in all substantive areas and programme cycle stages.

**Recommendation 3**: UNODC accepts this recommendation. The development of a detailed road map for increased collaboration with other United Nations entities may however be challenging, as collaborations depend on the context, both in terms of content and geographical scope. UNODC is however fully committed to United Nations reform initiatives and joint work with other United Nations agencies, whereby efforts will be made to identify good practices stemming from joint activities and joint programmes. Furthermore, UNODC will track its increased efforts for joint activities and joint fundraising. Due to the interconnectivity of the Sustainable Development Goals and the framework of the Secretariat’s enterprise resource planning (Umoja) a disaggregation by Sustainable Development Goals may be challenging but will be further explored. Finally, UNODC will continue making efforts to support Member States’ attainment of the Sustainable Development Goals at the country, regional, global and thematic level.