Appraisal Report of

Prevention of Trafficking in Children and Women and Protection of Victims of Trafficking in Bangladesh

Implementing Agency:
International Organization for Migration (IOM)

Acronyms and Definitions

ADB	Asian Development Bank
ATSEC	Action against Trafficking and Sexual Exploitation of Children
CPCCT	Co-ordinated Programme to Combat Child Trafficking
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
ERD	Economic Relations Division
ILO/IPEC	ILO International Programme on the Elimination of Child Labour (IPEC)
IOM	International Organisation for Migration
LEA	Law Enforcing Agencies
LEB	Locally Elected Bodies
MDGs	Millennium Development Goals
MWCA	Ministry of Women and Children Affairs
NATSPA	National Anti-Trafficking Strategic Plan for Action
NGO	Non Government Organisation
PIU	Project Implementation Unit
PSC	Project Steering Committee
SARI/Q	South Asian Regional Initiative (Equity support programme)
ToT	Training of Trainers
ToR	Terms of Reference
USAID	United States Agency for International Development

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1 Policy Relevance of the Proposed Project

1.1 Project Context

Trafficking is a serious crime and embodies many facets of human rights abuse. In Bangladesh, women and children are highly vulnerable to trafficking for purposes of sexual exploitation, domestic servitude, and bonded labour. Women and girls are the most vulnerable to trafficking. Although there are no credi ble statistics on trafficking, there are reasons to believe that the incidence of trafficking is quite high and to consider it a human rights violation at a national scale.

In this context, the proposed project will address the issue of trafficking through an integrated measure of prevention, protection, prosecution and capacity building. The project intends to focus its attention on the children, adolescent girls and women who are most vulnerable to trafficking.

1.2 National Policy and the proposed project

CPCCT pilot project supported by the Norwegian Government is considered a break through initiative in Bangladesh on counter trafficking at the government level. The piloting of CPCCT has provided a range of lessons learned for working on anti trafficking issues at the national level. It also creates the background for the government to develop a long term perspective with coordinated national programmes to fight back with counter trafficking measures. Government of Bangladesh with the support of ADB has prepared a National Anti-Trafficking Strategic Plan for Action (NATSPA). IOM had provided technical support to MWCA to develop NATSPA. The proposed project rightly adopted NATSPA in its intervention strategies, which include awareness raising/Prevention, Rescue, Repatriation, Prosecution and Integration.

The Government's (MWCA) commitment to grapple with the complexities of trafficking and to develop an atmosphere of collaboration and cooperation among the vast range of stakeholders - including different government agencies has been demonstrated in the project design through the inclusion of nine ministries as implementing partners.

The project content will seek to uphold the principles of human rights as provided in the GOB policy with particular emphasis on the protection of rights of children, adolescent girls and women, by promoting access to education, vocational training and income generating activities.

1.3 Networking with other programmes and organisations

The project envisages collaboration of multiple agencies from government, NGOs and private sector. Strategically important international NGO networks on trafficking issues will be linked to the project. However, the project can also benefit from other similar projects implemented in Bangladesh, which includes SARI/Q and ILO/IPEC.

Time-bound project of ILO may also offer good opportunity to benefit. Besides, IOM is also implementing a number of projects with strong relevance to the proposed one. All these provide tremendous scope and opportunity to the project to build on and complement on a wider scale.

1.4   Risks and assumptions

The project has been developed on the basis of a number of assumptions, which may also be considered risk factors to the success of the project. Involvement of the government agencies is a key success factor of the project yet there is inadequate institutional integration with the government agencies except MWCA. Operationalizing PSC and PIU needs to be prioritised high on the project agenda. Similarly, the project expects to receive referral support from competent NGOs. Support from other IOM project(s) may be instrumental in ensuring effective referral service.

2 Programme Design

2.1 Goal and Objectives

The project aims to address trafficking of children, adolescent girls, and women through coordinated and integrated approach. It envisages addressing the vulnerability of the potential targets of trafficking through intervention in prevention, protection and prosecution aspects in human trafficking.

The project emphasis is on the vulnerability of the children, adolescents and women who are prone to trafficking. On the other hand the project also plans to provide redress to the people who have already become victims of trafficking. The magnitude and complexity of the issue requires a multi dimensional and coordinated approach among various institutions and agencies. A single agency cannot handle such a big issue. The project has rightly considered the need for multi-agency involvement to address the issue. The project concept is therefore well developed and relevant to the context of Bangladesh.

The project design is however lacking in clarity about the results, the project intends to achieve. The project aims to reduce the case of trafficking without specifying any objective estimates. Establishing credible data on human trafficking can itself be a good project result. As far as multi-sectoral approach is concerned the intended project result is rather weak. The project can bolster the result by establishing an institutional mechanism where GO agencies, NGOs and private sector can participate to address the issue of trafficking in a sustainable manner –not just during the project period.

2.2 Project Strategies and Approach

The strategies envisaged in the project include: Rights based approach, Capacity building, Integrated approach, Community involvement and participation, Partnership, NGO strengthening and networking, and Linkage building. Project components and activities are mostly based on these strategies though there is lack of sufficient detail in activities and components. This is an area where the project needs to work on to improve implementation. Each strategy has to be elaborated in one or more of the project components and activities.

2.3 Project components and Relevance of the activities

The project has four components that include: Prevention, Protection, Prosecution and Capacity building. Prevention is primarily based on awareness raising activities. A range of activities has been planned to increase public awareness. The project needs to develop a communication strategy to establish synergy among the various awareness development methods. Empirical evidence suggests that interactive and personal attention is more effective in promoting critical awareness. Only information dissemination is not enough to build awareness particularly on a complex issue like human trafficking. As far as the protection component is concerned, the project has given more emphasis on rehabilitation through livelihood development. The important issues of safety, security and trauma are not adequately elaborated in the project document though IOM has plans to address this issue through referrals. The project needs to have a clear plan for dealing with this issue.

2.4   Anticipated results and indicators

The project has articulated indicators and results of project components and activities. However the results have been articulated as completion of activities. They do not indicate what the contribution of specific activities is towards achieving project objectives. At the project management level, the information will serve the purpose of project efficiency but not the effectiveness of the project. Therefore, the project needs to develop an elaborated framework to articulate project results not only in the form of activity completion but also the anticipated change and development that affects the participants and institutions as intended in the intervention.

2.5   Experimentation and learning

Part of the project activities are pilot for IOM particularly livelihood development of the survivors and vulnerable people. IOM will implement activities related to this in four selected districts. There is no scope in the project design to replicate the learning within the project period.

Livelihood development is a key strategy to provide redress and reintegrate the survivors. The absence of rehabilitation programmes in other districts will have an impact on the credibility of the protection programme. The project needs to address the protection issue in these districts through referral, networking and linkages. The project strategies and activities needs to be further explained early in the project.

2.6   Key issues in the project design

The project design has a number of issues that needs to be addressed in the initial part of the project implementation. Following are the issues:

2.6.1   Prevention Component

Workshop on community campaign: This activity may be redesigned to develop a strategy paper on community campaign. The strategy paper should describe in detail methods and approaches for the project's awareness building component and delineate its communication strategy.

Road March: Road March is a politically charged programme which has relatively less impact on awareness development given the resources spent on it. This activity can be replaced by interactive community based action drama and folk based cultural programme to disseminate the message in an interactive way. The project can employ some innovative approach here to enhance impact.

Bill Board: IOM plans to set up 44 billboards in 22 districts based on the entry and exit location criteria. Such criteria seem to be quite generalised considering 22 districts when many of them will be adjacent to each other. Moreover, the billboard may not be the most cost-effective communication tool to disseminate complex messages such as those of counter trafficking. Therefore, initially a limited number of billboards can be put up, may be 1 per district and see the effectiveness of this tool during the awareness assessment. If it is found to be effective, then more billboards can be put up later on. Contingency fund can be used for additional billboards.

Seminar on Educational Curriculum: The seminar is a strategic event to kick start a long process or curriculum design. Follow up action plan and activities have to be included to make a reasonable contribution from the project side to include the trafficking issue in educational curriculum.

2.6.2 Protection Component

Mapping of available resources: Similar activity has just been completed by a USAID project called SARI/Q. This will be a duplication of existing work. The project can benefit from the work of SARI/Q in various aspects of protection and prosecution. An effective linkage with SARIQ will add value to this project.

Vulnerable vs Victim of Trafficking: The project seems to have given similar weightage to survivors and people with vulnerability as the project participants. But as a matter of principle, the survivors should be given priority for project support over the vulnerable. The project should first cover 100% victims in its catchment area and allocate remaining resources to address the vulnerable people.

Rehabilitation vs reintegration: Rehabilitation through livelihood security is one element of reintegration. But there is also a critical social element in reintegration on which the project has not put enough importance. One cannot neglect this aspect in the context of our social dynamics and reality. The project has to develop this approach during implementation.

2.6.3 Prosecution Component

Referrals: IOM intends to address the case management of survivors through referrals. However, no such mention is made in the project document. Whole process and strategy of repatriation and prosecution need to be elaborated.

Procedural Review: The project does not have any activity to review and improve procedures with regard to prosecution. However, IOM is implementing a project with USAID[1] support which will address this issue more elaborately. The result of that project will contribute positively to this project.

2.6.4 Capacity Development

NGO Capacity Building and Networking: The project envisages support to ATSEC or any other competent organisation with a block fund to train NGO staff and strengthen NGO networking. ATSEC will build capacity of 60 NGOs. However, detail activities of ATSEC and role of 60 trained NGOs within the project context are not quite clear which needs to be elaborated further. ATSEC training programme should be based on the practical as well as strategic needs of the project.

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[1] The review was told by IOM staff on the USAID project. However, the review team did not have the access to the USAID support project document.

3   Institutional Issues and Project Management

3.1   Implementation Set Up

The project will be implemented in a collaborative framework where IOM will assume the main responsibility of delivery of project outputs with the support of the government agencies and NGOs. Relevant government agencies will come together under the leadership of MWCA to spearhead the project policy formulation, provide strategic directions and more importantly participate in implementation. The Project Implementation Unit (PIU) to be set up at the MWCA can deliver the role as expected in the project. Besides there will be a Project Steering Committee at the Ministry level to oversee the project and provide policy guidelines. All relevant ministries will be involved in the Project Steering Committee.

The proposed implementation set up provides sufficient opportunity to draw on the comparative advantages of each institution to contribute in the project implementation. It will require adequate clarity and commitment from the respective agencies to accomplish the organisational leverage that the project is seeking. There seems to be a role confusion or potential role confusion between IOM and the PIU to be set up at MWCA. PIU will have the ability to bring in necessary governmental support and cooperation the project will require during implementation. Therefore PIU will need to have clear mandate and responsibilities to effectively participate and contribute to the project and ultimately to take responsibility. This will require the PIU to be headed by a senior government official not below the rank of a Joint Secretary to work as counterpart to IOM in the project implementation. All operational issues need to be consulted and agreed upon at the PIU level. Therefore, PIU should not only provide advice but also participate in decision making processes. This will require people involved in the PIU to have hands on exposure on project processes and implementation. The project should provide adequate scope for the PIU members to visit project sites and engage them in events like district level training, meetings etc.

At the community level NGOs will be involved primarily in awareness development and training and rehabilitation of the victims and/or potential victims. NGOs have comparative advantage over other institutions in terms of awareness development and rehabilitation. Therefore NGOs can bring in necessary value to the project provided NGOs are selected objectively and on the merit of their respective competencies.

3.2   Decision Making Structure and Processes

The project envisages establishing several tiers of decision making based on the complexity and importance of the issue. However, ToRs for each level are yet to be detailed out such as what would be the mandate and decision making responsibility at various levels. This issue needs to be resolved at the beginning of the project in a consultative manner. Project Steering Committee (PSC) should focus absolutely on strategic and policy issues such as project strategy, implementation methods, stakeholder analysis, inter-agency collaboration, annual planning and budget review etc. The PSC should meet at least twice in a year. The formation and ToR of the PSC needs to be completed within the inception period of the project.

At the operational level, IOM and PIU are the main project structures related to the decision making of the project. As the implementing agency IOM will be responsible for decision making of the total project. However, there is a need to have adequate

consultation between IOM and PIU to proceed with the decisions. Following are some of the areas where consultations can potentially improve decision-making.

- Recruitment and placement of proposed staff
- Recruitment and contracting of NGOs
- Annual work plan
- Project Inception report
- ToR and contracts for all outsourcing activities
- Studies, reviews and evaluations

IOM should have the responsibility to accomplish the activities mentioned above but with concurrence from PIU. Concurrence will also be required from the donors with regard to the project inception report and annual work plan.

3.3   Mainstreaming the project

The project is proposed to be implemented through NGOs as well as government institutions. The involvement of the government is there but not quite significant. Strengthening MWCA and enhancing role of PIU will contribute to mainstreaming the project in the government system. Some of the project outcomes such as review of educational curriculum; protection and prosecution element of the project might help in mainstreaming of the project in the government system and provide sustainability. The project needs to have a clear strategy for "**BUY IN**" from the government officials at all stages of the project management. PSC, PIU and Study tour might be good "buy in" strategies for mainstreaming. However, some of the important ministries have been left out from the project particularly with regard to the mainstreaming. These ministries and agencies include: Economic Relations Division (ERD), Planning Commission and Implementation, Monitoring and Evaluation Division (IMED). Support and cooperation from these agencies will be vital for further integration of the project and possible future government initiated programme. These agencies need to be involved in the project not necessarily through PIU but in some other form including PSC. Representative from these agencies need to be included in the study tour.

Besides, mainstreaming the project at the government level, the benefits created by the project needs to be sustained. Awareness development activities are expected to bring in change and motivation among the general masses. However for protection and prosecution, there is need for establishing institutional mechanisms that will be mandated from the government to ensure that the victims are adequately protect and required prosecution measures are taken in a sustainable manner. The project needs to develop formulated strategies and establish institutional mechanisms both with the MWCA as well as the Department of Women Affairs.

3.4   Human Resources planning and staffing

The project envisages six full time staff headed by a National Programme Officer. Other members of the team will include an Advisor, two Project Coordinators, one Project Assistant and a Finance Staff. IOM have prepared detail ToR for each of these positions. The National Programme Officer will be responsible for managing the programme. Advisor will provide technical and conceptual support to the project implementation. Project Coordinators will be directly involved in programme delivery and will provide support to the NGOs.

The NPO position has been planned overwhelmingly with managerial responsibilities with little content in anti trafficking programme activities. It is expected that the person should have comprehensive knowledge and experience in counter trafficking with in-depth legal understanding and that s/he should be involved in direct programme delivery. Therefore the Advisor's position can be eliminated as a full time staff but given that IOM have limited experience in rehabilitation of victims with livelihood options, a consultant position can be created for 12 months to establish a livelihood development programme component in the project. This position can be created for the 2nd year of the project. Likewise other consultant positions can be created for the 3rd year to mainstream the project in the government system with supporting the key issues like educational curriculum and prosecution.

3.5   Financial Management

Overall financial management responsibility lies with the IOM. It has an established system of financial management. The project can benefit from the IOM system. IOM should develop a common reporting format in consultation with the donors to satisfy the information needs of all the parties involved. IOM project account should be audited annually by a recognized audit firm based on a ToR prepared in consultation with the donors and PIU. Audit reports should be circulated and discussed with the donors as well as PIU. IOM needs to establish an internal audit system to monitor the NGOs with regard to financial record keeping and reporting.

3.6   External Review and Assessment

The project envisages a Mid Term Review (MTR) to assess project progress in relation to the goal and purposes. The MTR will provide an opportunity for the project to take stock and plan for the remaining period in a flexible approach. However, it would not be possible for the MTR to assess the immediate impact of the project particularly with regard to the awareness development, which is a major prevention component in the project. The project should include a longitudinal study to assess the impact of its awareness development activities. A systematic and scientific study method should be applied at least twice during the project period to assess the awareness development over time. First assessment should take place one year after the start of the awareness development programme and the second study should take place exactly one year after the first study. The Project should harmonize its awareness development studies based on the results of the study. Besides, the project should take a number of case studies on livelihood options, repatriations, and social reintegration to develop a body of knowledge and use those materials for advocacy and policy development.

4 Budget Analysis

IOM has prepared a three-year budget based on its plan of action and programme targets that is Tk. 211,619,608 or UDS 3,167,010[2]. Core institutional cost such as personnel cost, recurring costs and organisational overhead are calculated based on its organisational policies and practices. Other programme related costs are estimates based on its assumption of possible expenditure.

4.1 Analysis of cost breakdown

Overhead at the IOM: The cost breakdown suggests that IOM will spend 74% of the budget for programme delivery and the remaining 26% will be used for programme overhead including 5% institutional overhead for IOM international office. Personnel cost will run a little over 13% of the budget and office management cost will be around 8% of the budget.

Partner NGO Overhead: IOM plans to employ 11 NGOs to implement awareness building activities and other field level activities. The project will support NGOs with two full time staff and practical compensation for the Executive Director and Financial Officer. Besides, the project will provide a lump sum amount for office costs. IOM has allocated an amount of Tk. 21,862,500 or 11 % of the budget for NGOs overhead**.** Programme budget for the NGOs will be separately allocated based on agreed action plan. Thus the effective overhead of the project stands at around 37%. The remaining 63% budget will go directly for programme beneficiaries.

The overhead ratio is higher than similar programmes run by NGOs or other international agencies. But this is not exceptionally high given that 5% of the overhead is directly deducted for IOM headquarters. Besides, the total budget of the programme is not significant which has an implication for high overhead.

Travel and DSA for IOM based project staff: IOM has planned 660 field visits with an allocation of almost 5% of the budget for its lean programme staff. This appears to be quite high in the context of total time available to the programme staff. With the abolition of a full time advisor, the planned trips can hardly be achieved. However, trips by government officials can be covered with this fund.

Child Focus Programme: The project has specific programme components for children, which includes awareness building, education and training for under privileged children and training and dissemination meetings. Total cost for child component is estimated at Tk. 21.56 million which is 11%. About 50% of this amount will be spent in four districts as pilot for education and training for underprivileged children.

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[2] This budget is the outcome of the appraisal mission based on the revised budget provided by IOM during mission.

Adolescent Girls and Women focus programme: The project has specific programme components similar to the above for adolescent girls and women. The project has allocated Tk. 75.84 million or 39% of the total project for this. About half of this amount will be spent for economic development of 1925 vulnerable girls and women. The project plans to give away Tk.20,000 per person for livelihood development. This amount should be used carefully based on individual's capacity and economic opportunity. A stringent follow up mechanism has to be built-in to ensure that the money does not increase concern for security and safety of the recipients.

Bill Board: Budget for installation of 22 billboards in each of the 22 districts has been included in the budget. However, after the first awareness assessment, if bill board is found to be an effective communication media for trafficking, additional bill boards can be installed seeking fund from contingency.

4.2 Cost Effectiveness of Programme Component

IOM cost structure for programme is similar to other comparable organisations such as UN organisations. Programme benefits will be spread over many stakeholders in 22 districts including government officials, NGOs and general public. Around 2000 people with social and economic vulnerability will be rehabilitated with meaningful employment by the project. More than 1 million will have critical awareness on human trafficking. These people are expected to form a critical mass to protect the vulnerable people from human trafficking. Programme budget for these results and benefits can be justified given the project can really create this impact in the society. A number of activities can be changed from the perspective of cost effectiveness as well. These were discussed in the programme design section of this report. However, the main challenge will rest on IOM's ability to produce an effective result. Monitoring needs to be very systematic and stringent to ensure that the project lives up to its expectation. IOM will have to develop and establish a monitoring framework with results-oriented indicators.

4.3 Contingency Fund

The budget prepared by IOM does not have any allocation for contingencies given that the project is in many ways an experimental one. Therefore contingency allocation needs to be maintained in the budget to enable the project to allocate extra fund to meet any emergent needs that may come up during the project implementation. 5% of the total project fund may be set aside as contingency. However, IOM will require concurrence from the donors to use the contingency fund.

4.4 Funding Mechanism for Donors

The Royal Norwegian Embassy and the Embassy of Denmark have conveyed their formal intent to support the project. Since the project is developed in an integrated manner, it will be operationally efficient and less cumbersome if the two donors form a consortium to jointly fund the project. The funding level might be different for two donors but the commitment and involvement is terms of project steering should be equally shared. Given that a large part of the project component will be experimental for IOM, it is expected that the donors will provide necessary inputs during the implementation to ensure that the project runs successfully and generates expected results. Therefore, both the donors should set aside some funds to support the project in the form of MTR, Final evaluation, and other need based consultancy inputs.

Coordination among the donors will be critical to ensure effective steering. One donor should provide the leadership in the steering process. This should be mutually agreed on between the donors. However, the leadership can rotate on a yearly basis. Though the donors will sit in the project steering committee, there is a need to meet with IOM bi-laterally to resolve mutual issues. Therefore, the donors may sit with IOM on a quarterly basis.

4.5   Financial Reporting

IOM has standard yet flexible reporting system for the donor-funded projects. It uses a standard computerized accounting system that provides necessary flexibility to generate reports to satisfy the specific requirement of donors. Since the project will use funding from two donors, IOM will require to report in way that satisfy the requirements of both the donors. Donor's reporting format has to be developed in consultation between IOM and the potential two donors. IOM will generate quarterly financial reports for the donors. However, it will have to prepare monthly project reports based on its PAS 2000 system, which will be ratified by its central financial system based in Manila. These reports will be the basis for audit and financial reviews.

5 Recommendation and Conclusions

The proposed project is relevant to the context. Its strategies and approaches are well integrated with the project context. However, there are certain aspects that the project should review and reconsider for further development. Following are some of the recommendations.

Overall

The project is planned for 36 months. This period should be divided in to two phases. The first three months should be considered an inception phase and the remaining periods as implementation phase. During the inception phase the project should:

- Prepare comprehensive project document including work plan, implementation methods and training and awareness development content and processes.

- The inception report should be discussed and approved by the Project Steering Committee (PSC).

- IOM should develop NGO selection process to ensure that only the competent NGOs get selected. A competitive selection procedure using limited bidding methods can be adopted.

- IOM will need to ensure that the right quality staffs are placed from the very beginning of the project. National Programme Officer should assume his/her responsibility from inception of the project.

Programme Aspects

- The project should focus on interactive methods in awareness development activities. The whole awareness related activities should be based on a clearly defined communication strategy.

- Impact of awareness development activities should be evaluated periodically using scientific and systematic methods.

- Awareness building activities for children and adolescent girls and women can be combined together to minimize duplication and build leverage.

- Within the protection component, referral services have be ensured for all victims particularly for safety, security and trauma management. Project strategy on networking and linkages needs to be further elaborated and put in place for ensuring the early recovery of the survivors.

- The economic opportunities offered by the project should be accessed by the survivors on a priority basis.

- The project will need to develop effective replication strategy based on the pilot experience.

- IOM will need to strengthen its prosecution component with regard to referral and procedural review of legal aspects.

- A detailed programme of capacity development needs to be prepared in consultation with ATSEC or a competent capacity development organisation.

Institutional Aspects

- PIU needs to assume increasing level of responsibility and ownership of the project for greater sustainability and mainstreaming. PIU would effectively work as counterpart of IOM and increasing level of decision-making role.

- The project staffing needs to be restructured with the abolition of the advisor position. In lieu of that, two consultant positions can be created for 12 months each respectively on livelihood development and mainstreaming the project with the government particularly on educational curriculum and legal procedural review.

Financial Aspects

- The budget needs to be reviewed in line with changes in programmes and institutional arrangements.

- A contingency fund equivalent to 5% of the project cost needs to included in the project for ensure adequate flexibility of the project design.

- Per Diem and DSA budgeted for IOM staff should be used to pay for the travel made by relevant government officials involved with PIU and steering committee. Government official should receive same amount of DSA and avail transportation like IOM.

- IOM should prepare a uniform financial report for the donors to be submitted quarterly.

This project promises lots of opportunity for the people who are already victims of trafficking. But more importantly, the project will secure lot more potential victims from abuses and violation of human rights. But there are also challenges of receiving support and cooperation from all the agencies as envisaged in the project design. IOM's organisational character and credibility might be very instrumental in bringing in relevant agencies together and share responsibility to secure the lives of the vulnerable and victims. The project has the potential for the donors to contribute in preserving the rights of the people living in difficult conditions and learn from it. The appraisal mission rightly endorses the donors' intention to support the project.