

Interim Performance Evaluation

*Promoting Better Understanding of Indicators to Address Forced Labor
and Labor Trafficking in Peru*

United States Department of Labor

Bureau of International Labor Affairs

Office of Child Labor, Forced Labor, and Human Trafficking

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Interim Performance Evaluation of *Promoting Better Understanding of Indicators to Address Forced Labor and Labor Trafficking in Peru*
Interim Evaluation Report

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LIST OF ACRONYMS

| | |
|----------|---|
| CHS | Capital Humano y Social Alternativo |
| CL | Child Labor |
| CMEP | Comprehensive Monitoring and Evaluation Plan |
| COVID-19 | Severe Acute Respiratory Syndrome-Related Coronavirus 2 |
| CSO | Civil Society Organization |
| FISTRAP | Provincial Prosecutor's Office Specializing in Human Trafficking |
| FL | Forced Labor |
| FOA | Funding Opportunity Announcement |
| GoP | Government of Peru |
| HT | Human Trafficking |
| INEI | National Institute of Statistics and Informatics |
| ILAB | Bureau of International Labor Affairs |
| ILO | International Labour Organization |
| IMPAQ | IMPAQ International, LLC |
| M&E | Monitoring and Evaluation |
| MINHUSH | Ministry of Justice and Human Rights |
| MoL | Ministry of Labor |
| NCFAFL | National Commission for the Fight Against Forced labor |
| KII | Key Informant Interview |
| OCFT | Office of Child Labor, Forced Labor, and Labor Trafficking |
| OECD | Organisation for Economic Co-operation and Development |
| PMP | Performance Monitoring Plan |
| PSA | Pre-Situational Analysis |
| RETA | Registration and Statistics System for the Crime of Human Trafficking and Related Crimes |
| RF | Result Framework |
| SISTRA | Strategic Information System on Human Trafficking (under the Public Prosecutor) |
| SUNAFIL | Superintendencia Nacional de Fiscalización Laboral (National Labour Inspection Superintendence) |
| TOR | Terms of Reference |
| TPR | Technical Progress and Status Reports |
| UNICEF | UN Children's Fund |
| USAID | United States Agency for International Development |
| USDOL | United States Department of Labor |

EXECUTIVE SUMMARY

Background

The United States Department of Labor (USDOL) awarded the Capital Humano y Social Alternativo (CHS) a four-year, USD \$2 million grant to help the government of Peru (GoP) and labor stakeholders build capacity to prevent, detect, and eliminate forced labor (FL) and labor trafficking in the workplace. The *Promoting Better Understanding of Indicators to Address Forced Labor and Labor Trafficking in Peru* project (Engagement Against Forced Labor) began in December 2017 and will continue through December of 2021. CHS is implementing this project, which seeks the “engagement of labor stakeholders to better understand and address indicators of forced labor and labor trafficking through consultations and consensus building in Peru” in the regions of Lima-Callao, Loreto and Cusco. The project is a capacity-building project, aimed at improving and strengthening capacity of labor stakeholders and civil society to understand, address and follow-up on indicators of forced labor and labor trafficking in the country.

Evaluation Objectives and Approach

The main objectives of the interim performance evaluation are to:

- Assess the project’s relevance to Peru’s cultural, economic, and political contexts, as well as the validity of the project design and the extent to which it is suited to the priorities and policies of the host government and other national stakeholders;
- Determine whether the project is on track to meet its objectives, identify the challenges and opportunities encountered in implementing the project, and analyze the factors underlying these challenges and opportunities;
- Assess the effectiveness of the project’s strategies, as well as identify its strengths and weaknesses in implementation and areas in need of improvement;
- Provide evidence-based conclusions, lessons learned, and actionable recommendations; and,
- Assess the project’s plans for sustainability at local and national levels and among implementing organizations and identify steps to enhance its sustainability.

Through this interim evaluation, the evaluation team provides key stakeholders with information to assess and revise, as needed, the project’s implementation, work plans, strategies, objectives, partnership arrangements, and resources. The evaluation team has gleaned information from a diverse range of project stakeholders who participated in and were intended to benefit from interventions. The scope of the evaluation includes a review and assessment of all activities carried out under the USDOL Cooperative Agreement with CHS. The evaluation team considered all activities that have been implemented from the project’s launch through the time of evaluation fieldwork.

To conduct this interim evaluation, the evaluation team primarily collected qualitative data remotely. The team obtained quantitative data from available Monitoring and Evaluation (M&E) records and project reports and incorporated them into the analysis. The team triangulate quantitative and qualitative data for many of the evaluation questions to strengthen the credibility and validity of the results.

The evaluators conducted remote interviews with a wide range of stakeholders in the intervention regions, interviewing 43 stakeholders. The interviewees included representatives of the grantee, implementing partners, the host-country government, and civil society stakeholders. The fieldwork

was initially programmed for the second week of March 2020, but it was eventually postponed due to the Coronavirus Disease (COVID-19) outbreak and conducted remotely in October 2020.

Main Findings and Conclusions

The findings address the 12 evaluation questions approved in the Terms of Reference. The evaluation team presents them in this report by evaluation area: project relevance, effectiveness and efficiency, and sustainability.

Project Relevance:

The evaluation team found that the project corresponds to the needs of the target groups and it is aligned with the national policies against FL. However, the evaluation identified some shortcomings and limitations related mostly to the project's operations. Below is a summary of main findings regarding the project's relevance aspects.

- **A gap to be filled in terms of knowledge and expertise.** FL is a relatively new concept in the Peruvian legal/criminal system. Many institutions that have a specific mandate to enforce laws proscribing it do not yet necessarily possess the technical knowledge or methodological tools to do so in an effective and consistent manner. The project's focus on indicators of forced labor matches the needs of the justice system and other labor stakeholders (i.e. the Ministry of Labor).
- **The three outcomes of the Results Framework (RF) represent a coherent sequence of intervention.** However, its inherent logic has not been easy to translate into a workable and realistic program of activities. The RF might require some adjustments to better reflect the project's current situation, which is putting more emphasis on the regional level.
- **The two-pronged approach, working at the central/policy level and regional/grassroot level, was a sound combination in theory.** In practice, the top-down dynamic has not performed as expected. The pivotal role assigned in the project strategy to the National Commission for the Fight Against Forced Labor (NCFAFL) constrained the program's implementation of activities. The bottom-up approach, i.e., the program of actions foreseen at the regional level, however, has proven more adequate to meet the stakeholders' needs and expectations.
- **A reflection on the critical assumptions: CHS conducted consultations and appraisals prior to designing the project and throughout the elaboration of the Comprehensive Monitoring and Evaluation Plan (CMEP) and the Pre-Situational Analysis (PSA).** The volatility of the political environment in Peru is the primary factor causing the mismatch between the assumptions made in the project's design and the actual course of events. Some of the stakeholders consulted, however, maintain that institutionalizing new processes in the Peruvian institutional environment is very challenging per se and much more so under the current political volatility; second-best alternatives could have been anticipated beforehand.
- **Complementarity and inter-action with other USDOL and/or U.S. Government funded projects.** The CHS Indicators project complements other interventions funded by USDOL (The International Labour Organization (ILO)-Bridge project) or United States Agency for International Development (USAID) (Combating Human Trafficking) projects. The ILO-Bridge project team has been in contact with the CHS project team, and the teams have exchanged information on their respective actions. To date, no specific or formal collaboration has been agreed upon or has materialized.

Effectiveness:

- **Delays in the delivery of the project outputs:** The delivery of the different outputs is delayed due to different factors described in the report. As of October 2020, 41 percent of the budget has been spent while 70 percent of the implementing time has already elapsed.¹ There are some key outputs under outcomes 2 and 3, more specifically the technical proposal for the FL monitoring system and other associated products (training and materials), that are still in the early stages.

The evaluation team has identified the following results and preliminary effects associated with these results.

- **At the national/policy level: The advocacy work has been successful.** The National Plan Against Forced Labor III includes a reference to the application of FL indicators. The project has mobilized members of the National Congress to undertake legislative initiatives related to FL and other related issues. The Project has signed agreements with various Ministries to provide different types of services, mainly training and improvements to the registration platforms.
- **At the regional/grassroots level:** CHS has carried out an intense effort to mobilize, articulate, and build capacity, resulting in new coordination structures, more knowledge amongst stakeholders, and motivated teams.
- **Status of the FL monitoring system.** The project recently completed four preparatory studies meant to serve as basis for the elaboration of the technical proposal on FL indicators for the Peruvian stakeholders. Simultaneously, CHS has appointed the group of specialists to develop the technical proposal on FL indicators; the first draft is expected in the first quarter of 2021. The project team anticipates that these two products will result in institutions implementing the FL monitoring system gradually. The evaluation team questions the feasibility of implementation because of the political climate and the consequences of the Severe Acute Respiratory Syndrome-Related Coronavirus 2 (COVID-19) crisis.
- **Summary assessment of the effectiveness:** The evaluation team's overall assessment of the project reflects the dichotomy in the performance between the national/policy level and the regional/grassroots level. The evaluation team found that the project has made some interesting and promising inroads at the regional level, but that the project has encountered more challenges and impediments at the national level.
- **On the monitoring and reporting of the project.** Technically the CMEP and Performance Monitoring Plan (PMP) are considered very robust instruments, but the evaluation team has reservations regarding how they have been applied to express the project's current reality given its nuances. The evaluation team found the roll-out of the activities at the regional level was not necessarily well reflected in the early Technical Progress and Status Reports (TPRs), although, it is also possible that the course of the project in the regions was still building up and has just come to fruition during this last period. The evaluation team found the summary of the project achievements, listed in Annex A of the TPRs, to be very thorough but again it does not necessarily convey the project's whole picture or represent it comprehensively. More generally, communication has been a weakness of the

¹ Update of budget execution provided by the implementing partner (CHS) up to October 2020

project and this shortcoming has hindered the interaction between the ILAB and CHS teams.

Sustainability

In general, the project has expended most of its efforts to strengthen the public sector, targeting existing institutions that run their own programs and are covered by the national budget. This approach is a sustainable one, but there are other factors that could hamper the success of these efforts.

On the positive side:

- **Integration into institutional routines.** Many of the project deliverables could be integrated into the practices of existing institutions without requiring significant budget allocations. For example, the project's new protocols and registration tools that have been used for the FL cases can be integrated into the institutional routines.
- **Self-replicating processes.** Some of the outcomes resulting from the training and sensitization efforts (more knowledge, more awareness, etc.) could change patterns or behaviors and/or trigger cultural shifts among organizations and institutional networks with the potential to become self-replicating processes.
- **Commitment and ownership from regional stakeholders.** There are also positive signs emerging from the regional stakeholders' willingness and motivation to take this process forward.

The project's sustainability is threatened primarily by political, socio-cultural, and technical factors.

- **Political environment and post-COVID 19 situation.** Peru is currently experiencing a severe political crisis with constant changes in the Government Cabinet (4 presidents in the last two years). This combined with readjustment of priorities resulting from the current social and public health situation might affect the commitment and interest from Ministries and other relevant public institutions in taking the reforms proposed by the project forward.
- **Cultural paradigms.** The prevalence of some cultural paradigms caused challenges for disseminating the project's message and generating surveillance mechanisms at community level.
- **The lack of knowledge and expertise.** The lack of knowledge and limited capacity can cause inaction from some stakeholders and delay the project's effort to put in place and fully operationalized the monitoring system on FL issues.
- **Scaling-up and reaching the critical mass.** Although the project has generated very positive dynamics at the regional level, those dynamics mostly remain very localized and are mostly confined to the administrative centers. To have an effective and meaningful impact would require the project to scale-up the process and reach a critical mass at regional levels. In Departments such as Loreto and Cusco, this would likely require a sustained and persistent effort.

Lessons Learned and Promising Practices

The evaluation team found the following key lessons learned conducting the evaluation of the "Engagement Against Forced Labor" project.

- The design and preparatory phases have served to accurately identify the constraints faced by targeted institutions. However, the analysis of alternatives that follows most likely underestimated the severity of those constraints, as well as the likelihood of the risk factors

that could happen. Mitigation measures usually assume that these hurdles can be easily overcome by advocating and being persuasive, but this is not necessarily the case. Thus, the analysis of risks and critical assumptions needs to thoroughly consider alternatives beyond the best-case scenario, while being realistic about the limitations.

- The bottom-up approach (i.e. initiating changes at the grassroots level) might represent a realistic option to introduce new procedures and practices when building consensus at the policy level represents an uncertain path to achieve the project's objectives.
- The Results Framework should anticipate and avoid bottleneck situations where one of the Outcomes/Outputs is placed in such a critical position that its fulfilment becomes virtually indispensable and essential to continue the sequence. It seems advisable to maintain some degree of autonomy between components or some pre-identified alternatives to operate in case the key outcome is not fulfilled.

The following are the key promising practices:

- The use of existing networks and structures at the community level to disseminate messaging and improve the monitoring and surveillance capacity against forced labor. These structures are already in place and already seemed to have a significant effect in disseminating knowledge and raising awareness.
- Increase the capacity of justice operators² by using real case studies instead of theoretical and abstract modules in an academic style. This approach helped the trainees better understand and visualize the applicability of the training in their own daily practice.
- The comprehensive support provided to the justice operators and other stakeholders at the regional/local level. The project did not limit its support to the provision of lectures, but also supported anti-forced labor efforts by following up on cases and providing attention to the victims. This practice has been described as very useful to understand the whole cycle of intervention against forced labor.
- The use of inputs from grassroots interventions to inspire and sustain advocacy and influence policy. Together with other similar projects conducted by CHS, this project has been able to generate proposals and ideas to improve the regulatory framework that emerges from the daily practice of the justice operators. Political actors, such as National Congress members, have expressed positive views about the possibility of establishing these linkages between the two levels: direct action and political action.

Recommendations

The evaluation team suggests the following recommendations to CHS Project staff and USDOL to strengthen the long-term sustainability of the project's outcomes, and to improve future programming of projects to mitigate forced labor.

Recommendations for CHS Staff:

1. Conduct a comprehensive reassessment of the different options available to implement and operationalize the FL monitoring system.

The reassessment should include:

² Within the context of the project, the stakeholders refer to "Justice Operators" as all those institutions that have some responsibility in tackling Force Labor issues, generally the Police, the Public Prosecutor, the Public Defendant, the Judiciary, Regional Governments and different departments and units from the mainstream Ministries with mandate in this domain: Labor, Justice and Interior.

- ▶ A realistic appraisal of the current political, social, and public health circumstances.
 - ▶ A careful and exhaustive analysis of the options and recommendations put forward by the four preparatory studies recently delivered.
 - ▶ An analysis of the willingness and unequivocal commitment of key institutions, such as the MoL, to endorse and appropriate the system.
 - ▶ A review of the time requirements to implement the whole process.
 - ▶ Adopting a flexible approach and focusing on the specific requirements of the institutional partners should be an option to consider if the technical proposal for the FL indicators and monitoring system is not clearly endorsed by the incumbent institutions
- 2. Consider adjustments to the RF to better reflect the project's reality and current status.** The project team should consider some adjustments in the RF if the targets are reviewed, and the weight of the different components are rearranged. In any case, the evaluation team recommends that the project refine or reformulate some of the elements to better reflect the actual shift towards the regional space and visualize the training and awareness efforts which take place at this level.
 - 3. Explore the options to conduct further investment at the regional level.** In particular, the evaluation team recommends that CHS search, in a pro-active manner, for possible ways to trigger self-replicating processes to disseminate knowledge and information about FL.
 - 4. Further explore options of complementarity and collaboration with the ILO-Bridge project.** The ILO-Bridge project includes a component (Nº2) that covers policies, planning, and norms. The evaluation team anticipates that under this label there should be options for the two projects to collaborate to advocate and develop FL labor indicators and address other topics of common interest.
 - 5. Engage in regular contact with the Political Section of the U.S. Embassy to explore ways of collaboration.** CHS is already contributing to this dialogue via USAID in the domain of Human Trafficking (HT), but there is room to replicate this exercise in relation to the forced labor line of action and this USDOL funded action, in particular.
 - 6. Improve communication with USDOL and ensure the clarity, coherence, and comprehensibility of the documentation submitted.** Some of the early documents compile a lot of information but are not necessarily structured in a clear and systematic manner. The evaluation team also found that some of the regional processes, those of more intangible nature, were not well reflected in the reports.

Recommendations for USDOL:

- 7. Verify that the development of the CMEP by the contractor, grantee, and/or the implementing partner does not compromise or delay the start of program implementation.** USDOL has issued guidelines, materials, and templates to its partners providing guidance and clarification for development of the CMEP, but the experience of this project shows that this guidance might need some sort of explicit enforcement. Without an enforcement mechanism for USDOL guidance, there could be delays in the implementation of the full program of activities. This can be avoided or minimized by placing more emphasis and attention in verifying during these early stages that the program's activities run in parallel with enacting the CMEP.
- 8. Consider extending the project's period of performance with a non-cost extension.** All the data and information available to the evaluator suggests that time remaining will not

be enough for the project to complete the program activities. Unless there is a dramatic turn for the worse in the political circumstances, making the continuation unadvisable, the evaluation team understands that this extension might be justified to bring some processes to fruition. The evaluation team suggests an estimated extension period between 6 and 12 months, but the final decision on its length will depend on the remaining budget and an analysis of the tasks, which will need to be conducted jointly by CHS and ILAB.

- 9. Consider including more specific instructions and guidance in the corresponding Funding Opportunity Announcements (FOAs) requiring joint collaboration between USDOL-funded and complementary projects.** Without USDOL-initiation, collaboration among projects is occasional and hindered by institutional inertias and styles. An explicit requirement in the text of the funding instrument prompting the partners (grantee, contractor, etc.) to undertake specific measures in this regard might ease the process of collaboration among projects.

1. PROJECT DESCRIPTION AND CONTEXT

1.1 Project Description

The United States Department of Labor (USDOL) awarded the Capital Humano y Social Alternativo (CHS) a four-year, USD \$2 million grant to help the government of Peru (GoP) and labor stakeholders build capacity to prevent, detect, and eliminate FL and labor trafficking in the workplace. The *Promoting Better Understanding of Indicators to Address Forced Labor and Labor Trafficking in Peru* project (“Engagement Against Forced Labor”) began in December 2017 and will continue through December of 2021. CHS is implementing this project, which seeks the engagement of labor stakeholders to better understand and address indicators of forced labor and labor trafficking through consultations and consensus building in Peru, in the regions of Lima-Callao, Loreto and Cusco. The project is a capacity-building project, aimed at improving and strengthening capacity of labor stakeholders and civil society to understand, address and follow-up on indicators of forced labor and labor trafficking in the country.

The project’s main objective is to improve the capacity of labor stakeholders to understand and address indicators of FL and labor trafficking in Peru (See Exhibit 1 for the map of targeted project areas in Peru).

Exhibit 1. Project Evaluation Sites*



*Note: Interviews were conducted with government officials from the areas shaded in red: Cusco, Loreto, and the city of Lima.

To achieve this goal, the project seeks to achieve three main outcomes:

- **Outcome 1:** Improve understanding of forced labor and labor trafficking indicators among the NCFAFL.
- **Outcome 2:** Improve monitoring of working conditions linked to FL indicators by the NCFAFL.
- **Outcome 3:** Strengthen capacity of the labor inspectors to address forced labor and labor trafficking.

Exhibit 2 illustrates the projects' objectives and activities conducted.

Exhibit 2. Project Objective and Supporting Outcomes

| | |
|---|---|
| Objective: To improve the capacity of labor stakeholders to better understand and address indicators of forced labor and labor trafficking in the country of Peru. | |
| Outcome 1: Improved understanding of forced labor and labor trafficking indicators among the NCFAFL. | |
| 1.1) | Increased governmental agreement on forced labor and labor trafficking indicators among the NCFAFL <ul style="list-style-type: none">• Agreement approved by the NCFAFL to implement consensus building process of FL indicators |
| 1.2) | Increased technical capacity of the NCFAFL to develop FL indicators <ul style="list-style-type: none">• Technical proposal of forced labor and labor trafficking indicators submitted to the NCFAFL• Members of the NCFAFL trained on FL indicators |
| Outcome 2: Improve monitoring of working conditions linked to FL indicators by the NCFAFL. | |
| 2.1) | Forced Labor Indicators Monitoring System institutionalized among labor stakeholders of the NCFAFL <ul style="list-style-type: none">• Agreements approved by the NCFAFL to implement the monitoring system of forced labor indicators• Forced Labor monitoring system implemented |
| 2.2) | Increased availability of data on FL cases <ul style="list-style-type: none">• Labor stakeholders trained to implement the FL Monitoring System• Data on forced labor cases are available for use by relevant labor stakeholders |
| Outcome 3: Strengthened capacity of labor stakeholders and civil society to address forced labor and labor trafficking cases. | |
| 3.1) | Relevant Protocols adapted to include the registry and referral of cases linked to FL indicators and FL monitoring systems <ul style="list-style-type: none">• Recommendations on relevant Protocols submitted to labor stakeholders• Toolkit of referral victims to public and social services implemented |
| 3.2) | Worker organizations and Civil Society Organizations (CSOs) utilize Alert & Reporting Platform <ul style="list-style-type: none">• Alert & Reporting Platform implemented for workers' organizations and CSOs• Advocacy campaign carried out among the general public on the importance of alerting and reporting on situations of FL, based on the monitoring of landmark cases of FL |

Source: Terms of Reference, Indicators Project Interim Evaluation

1.2 Project Context

A 2010 report by USDOL on child labor (CL) and forced labor (FL) in the Production of Goods suggests that despite limited field research on FL in Peru, there is evidence that FL persists in three industries: 1) extraction of timber in jungle regions; 2) artisan-small scale informal gold mining activities; and 3) Brazil nut harvest. The GoP has engaged in numerous efforts to combat FL and labor trafficking. It is a signatory to multiple international agreements aimed to reduce FL, including the International Labour Organization (ILO) Conventions 29 and 105, and target 8.7 of the Sustainable Development Goals. The leading institution in FL is the Ministry of Labor (MoL), through the Vice Ministry of Labor. This Vice Ministry presides over the National Commission to Fight against Forced Labor, an entity that coordinates public and private institutions to fight forced labor. FL has been codified as a crime since 2017. The public entity responsible for prosecuting FL is the Public Ministry; the specialized prosecutors (Provincial Prosecutor's Office Specializing in Human Trafficking (FISTRAP)) are the governmental officials responsible for prosecuting FL, human trafficking, and other similar violations. In 2014, the GoP founded the National Labour Inspection Superintendence (SUNAFIL), a new institution to prevent and catch incidences of FL. SUNAFIL exists to promote and supervise compliance with labor standards for occupational safety and health and works to achieve universal “decent” working conditions. SUNAFIL actively conducts labor inspections; since its inception, its work has resulted in the addition of more than 10,000 workers to formal payrolls. Despite these efforts, FL issues persist and are especially resistant to change in the Amazon forest region of the country, where indigenous peoples are particularly vulnerable to labor abuses. Peru generally has a strong regulatory framework and monitoring structure to prevent FL and labor trafficking, though there is need for enhanced capacity to recognize indicators of such issues in the workplace.

2. EVALUATION OBJECTIVES AND METHODOLOGY

2.1 Evaluation Objectives

The evaluation team's main objectives in conducting the interim performance evaluation were as follows:

- Assess the project's relevance to Peru's cultural, economic, and political contexts, the validity of the project's design, and the extent to which it is suited to the priorities and policies of the host government and other national stakeholders;
- Determine whether the project is on track to meet its objectives, identifying the challenges and opportunities encountered in doing so, and analyze the factors underlying these challenges and opportunities;
- Assess the effectiveness of the project's strategies, and identify strengths and weaknesses in its implementation and areas in need of improvement;
- Provide evidence-based conclusions, lessons learned, and actionable recommendations; and,
- Assess the project's plans for sustainability at local and national levels and among implementing organizations, and identify steps to enhance its sustainability.

2.2 Evaluation Questions

The evaluation questions addressed the project's relevance, effectiveness, efficiency, perceived impact, sustainability, good practices, and lessons learned. The questions are grouped as follows:

Relevance of Project Design

1. To what extent is the project's theory of change and intervention logic suitable to, and coherent with, the implementing context?
2. Were the project's strategies relevant to the specific needs of its project participants, communities, and other stakeholders?
3. Given the country context at the mid-point of the project's implementation timeline, how relevant is the project's design? How are factors, such as the ongoing implementation of other ILO-funded projects in Peru (i.e., the ILO Bridge Project), affecting the CHS project's efforts?
4. Have any changes to the national landscape impacted the critical assumptions and risks articulated in the Theory of Change? If so, does the project have a feasible strategy for adaptation?

Effectiveness and Efficiency

5. How effective has the project been thus far in achieving its objectives? What driving factors have influenced the achievement or non-achievement of the objectives? What are the factors driving and/or hindering the timeliness of results so far?
6. How do project stakeholders perceive the project's efforts and contributions to combatting forced labor and labor trafficking in the target areas (Cusco, Lima, Loreto)?
7. Has the project caused any unintended results among its target communities and participants at the mid-point of the project's implementation timeline? If so, what were they?
8. How are factors related to the project's management and design, including designation of key personnel and staff capacity, affecting efficiency efforts? Are there relevant efficiency challenges (human/financial/etc.)?

9. How is the allocation of the project's budget actual expenditures, and burn rate affecting efficiency efforts?

Sustainability (limited assessment at mid-term):

10. What is the level of participation of the various stakeholders, their degree of commitment to the project's execution, and their contribution towards the project's objectives?
11. To what extent are the project's plans for sustainability adapted to the local level, national level, and the capacity/interests of implementing partners?
12. Are there any risks or opportunities that are likely to limit or facilitate the sustainability (technical, financial, economic, social, institutional, and environmental) of the project's results?

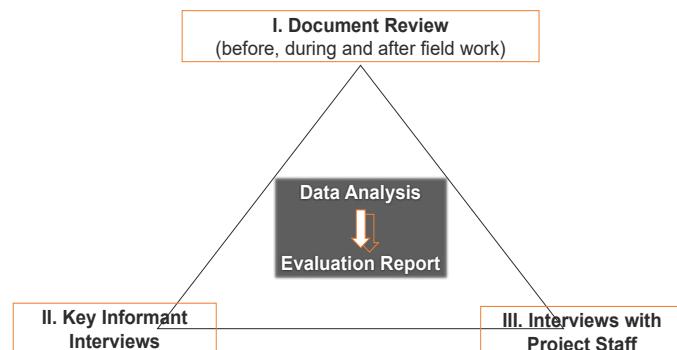
Good Practices and Lessons Learned

13. What are the promising practices and lessons learned that could benefit similar USDOL funded projects?

2.3 Methodology

Evaluation Team: The evaluation team consisted of a lead evaluator and a national evaluation specialist, who were supported by IMPAQ staff. The lead evaluator developed the methodology in consultation with IMPAQ, USDOL, and the project staff; directly conducted interviews and facilitated other data collection processes; analyzed the evaluation material gathered; presented feedback on the initial results of the evaluation to the national stakeholder meeting; and prepared the evaluation report. The national evaluation specialist provided further insight and analysis of the project's findings within the current implementing environment.

Exhibit 3. Evaluation Methodology



Approach. The evaluators collected data that were primarily qualitative in nature. The evaluation team conducted remote interviews with the project's stakeholders. The evaluators followed semi-structured interview protocols, making adjustments based on the interviewees' background knowledge and/or involvement in the project's activities.

In addition, evaluators obtained quantitative data from the project's documents and reports and incorporated them into the analysis. The evaluators triangulated quantitative and qualitative data for many of the evaluation questions to strengthen the credibility and validity of the results (see Exhibit 3).

Evaluation Schedule. The evaluation took place in October 2020. Prior to its initiation, the evaluation team reviewed project documents, developed data collection instruments, and collaborated in planning fieldwork interviews. The evaluators conducted interviews remotely from October 19 to 29, 2020, and presented preliminary findings at a debrief meeting on November 4,

2020 with representatives from USDOL. Most of the data analysis and report writing occurred from October 29 to November 18, 2020.

Data Collection. USDOL developed the evaluation questions with input from CHS Project staff and the IMPAQ evaluation team. These questions served as the basis for the guides and protocols used during key informant interviews (KIs) and document reviews. The methods used by the evaluation team to collect data are illustrated in Exhibit and include the following:

- *Document Review:* The evaluator reviewed and referenced numerous project documents including the project design document, grant modifications, technical progress reports (TPRs), performance monitoring plan, and other supporting materials obtained during the fieldwork component. [ANNEX B](#) contains a complete list of the documents reviewed by the team.
- *Key Informant Interviews:* The evaluator conducted interviews remotely with stakeholders in Peru. In total, the team interviewed 43 stakeholders. The interviewees included representatives of the grantee, implementing partners, host-country government (at central and regional level), national congress, and civil society stakeholders. Exhibit lists the stakeholder groups interviewed and their characteristics, as well as the number of interviews conducted, and number of persons interviewed by the evaluation team.

Exhibit 4. Stakeholders Interviewed for Interim Evaluation of the Indicators Project

| Stakeholder Group | Number of Interviews Conducted | Number of Persons Interviewed | Sample Characteristics |
|---|--------------------------------|-------------------------------|--|
| CHS Project Staff | 4 | 8 | CHS staff based in Lima, Cusco and Loreto |
| Local and Regional Government Officials | 10 | 13 | Representatives of regional or municipal governments |
| National Government Officials | 8 | 14 | Officials from the Ministry of Labor, Ministry of Justice, Ministry of Interior and the judiciary branch |
| U.S. Government Representatives | 3 | 3 | Political Officer, U.S. Embassy in Lima; International Relations Officer, USDOL, USAID |
| National Congress | 1 | 2 | Member of the National Congress |
| Others | 3 | 3 | ILO and Civil Society Organizations |
| TOTAL | 29 | 43 | |

De-brief meeting. The evaluation team did not conduct a stakeholder workshop given the restrictions on in-person meetings due to the COVID-19 pandemic. Instead, the evaluation team, held an online de-brief meeting convened by IMPAQ, in which the evaluators presented the preliminary findings to ILAB and CHS staff, and fielded questions and comments.

Data Analysis. The document review and stakeholder interviews generated a significant amount of raw qualitative data that the evaluators then categorized, synthesized, and summarized to analyze based on the evaluation questions.

The findings presented in this evaluation are based on information that the evaluation team collected from background documents and through interviews with project staff and stakeholders. The accuracy and usefulness of these findings relies on the integrity and relevance of the information provided to the evaluator from these sources.

Limitations.

The limitations of the evaluation are mainly associated with the challenges of replacing in-person data collection with remote methods. The in-person field work, initially programmed for the second week of March, but was suspended due to the Coronavirus Disease (COVID-19) outbreak and its associated restrictions. ILAB, IMPAQ, and CHS teams eventually rescheduled the fieldwork for October 2020 under a remote assessment modality. This represented a discontinuation of 6 months between the desk review-phase and the fieldwork-phase, while the project continued its implementation under the COVID-19 restrictions. Thus, the evaluation team needed to adjust for the evaluation's approach, including evaluation questions and the overall analysis to capture the implications of the COVID-19 situation, and this new scenario had to be brought into the evaluation questions and overall analysis. The challenges are listed below with the applied contingency measures.

- Conducting remote KIIs did not facilitate the same rapport as in-person interviewing. Unobtrusive observation was also not possible. As regards the rapport with stakeholders, the evaluation team carried out online KIIs in a way that enabled interviewers to ask (open-ended) questions. The evaluation team also offered opportunities for a more in-depth discussion about specific points related to the implementation of the project and the results achieved.
- Another limitation was that the evaluation team could not directly target community level beneficiaries to include in the analysis of this report, due to inability to have these stakeholders gather and reach them by phone, or other virtual means. However, given the more institutional nature of the project's stakeholders, the evaluation team was able to mitigate this limitation by relying on interviews with other stakeholders as a proxy to community-level interviews.
- Lastly, in a few cases, some of the respondents were not able to participate in the interviews at the date and time set due to poor connectivity. However, in most cases, the evaluation team successfully rescheduled and completed the interview at another time using a different platform that was easier for the respondents to use. There was only one case that the interview was cancelled, and we could not reschedule it.

3. FINDINGS

The findings address the 12 evaluation questions approved in the Terms of Reference (see [ANNEX D](#)). They are organized by evaluation area: relevance of project design; effectiveness and efficiency; and sustainability.

3.1 Relevance of Project Design

Question 1: To what extent are the project's theory of change and intervention logic suitable to and coherent with the implementing context?

3.1.1 The Project's Theory of Change

Technically, the project's three expected outcomes represent a logical and consistent sequence of intervention to achieve the project's objectives. Building consensus and validating indicators to identify Forced Labor (OTC 1), followed by the setting up and inter-connection of monitoring systems (OTC 2) and the capacity building of justice operators and stakeholders to monitor FL (OTC3), are adequate components to improve the capacities of the incumbent institutions to understand and address indicators of forced labor and labor trafficking in Peru (Project Objective). The evaluation team's analysis of the causality and cumulative effects between the different levels of the Results Framework (outputs, sub-outcomes, and outcomes) identified a consistent path towards the pursued changes.

The evaluation team found that the narrative sections of the project document did not present the project's internal logic and consistency in a clear and convincing manner. The initial versions that the team consulted during the desk phase were unclear and reflected a bewildering itinerary for the implementation of the project. The evaluation team reviewed, during the fieldwork phase, a revised version (V3) that improved some of these weaknesses. This newest version of the document is better organized and expresses the project's logic and Theory of Change in a clearer manner. The deficient clarity of the documents has been reported as an obstacle in enabling the flow of support from ILAB towards the project.

The operationalization of the above outcomes into a realistic and workable program has proven to be challenging in Peru's current context. The team identified two primary issues that it will describe in more detail in the following questions.

1. The evaluation team determined that based on the specific content and linkages between the outcomes, that the successful realization of Outcome 1, "Improved understanding of forced labor and labor trafficking indicators among the National Commission for the Fight Against Forced Labor (NCFAFL)," is a necessary precondition to realize Outcome 2 and, to a great extent, Outcome 3. Consensus and approval from Outcome 1 are needed to deliver the products and services foreseen in Outcomes 2 and 3. This has impeded the implementation. The project team proposes to address this impediment by expanding the regional scope for Outcomes 2 and 3. (See further.)
2. One of the project's main assumptions concerned the role assigned to the NCFAFL, in particular to the Technical Secretariat. This role, technically responsible for coordinating public policies over forced labor at the national level, was allocated a very prominent position in the project's strategy, assuming that everything that this Commission approved would have a higher level of political legitimacy and would trickle down to the whole system.

The NCFAFL even validated the project's approach, but the assumption of developing the project's logic on a "positive dialogue among labor stakeholders to agree and validate indicators" has not been fulfilled. It has been particularly challenging with the NCFAFL as a whole. Collaborative relationships with the Ministries (Labor, Justice, Interior) and the independent/autonomous institutions, such as the Public Prosecutor individually as separate bodies, have been easier to establish, although there was a need to introduce specific adaptations in each case.

The evaluation team has found that the disaggregation of the three main outcomes in supporting outcomes and outputs, does not fully reflect the complexity and variety of products and services that the project is delivering, particularly in terms of increasing capacity and raising awareness. This issue will also be discussed further.

Question 2: Were the project's strategies relevant to the specific needs of the project's participants, communities, and other stakeholders?

3.1.2 Needs of Participants, Target Groups, and Government Stakeholders

Consultations conducted by the evaluation team confirm the relevance of further developing forced labor indicators in Peru. Forced labor has been recently codified as a crime in the Peruvian criminal system (Legislative Decree N° 1323 of January 2017), which, in practice, means that justice operators are not familiar with the specifics of this reform and, therefore, are not fully able to enforce it as they should. Several respondents who belong to this group recognized their limited knowledge of the new regulation and expressed difficulties identifying the signs of forced labor and its differentiation from other unlawful situations in the field of labor and human exploitation.

The evaluation team found that there was little knowledge and expertise on this matter, including among Ministries, justice operators, academia, and CSOs. Several respondents referred to the very limited number of specialists in the subject, the inadequate and little research trajectory and the absence of clear models of intervention available. This lack of knowledge, according to some testimonies, is causing inaction from the institutions in charge and allowing many potentially unlawful situations to go unprosecuted. The 11 indicators issued by ILO³ have not necessarily been well disseminated across the whole spectrum of institutions and territories. Moreover, the ILO indicators have been formulated generically, thereby, they are not illustrative enough to aid those who have to interpret real cases.

The evaluation team also determined that different forms of exploitation are deeply ingrained in some uses and social practices such as the "padrinazgo or madrinazgo". It is a traditional practice in many parts of the country that children from poor and mainly rural backgrounds are offered education, food, housing, and a supposedly better future by families in urban areas while in most

³ The ILO indicators of Forced Labor represent the most common signs or "clues" that point to the possible existence of a forced labor case, such as restriction of movement, deception, threats... They are based upon the definition of forced labor specified in the ILO Forced Labour Convention, 1930 (No. 29) and derived from theoretical and practical experience of the ILO's Special Action Programme to Combat Forced Labour (SAP-FL). More details and information can be found in https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm

cases they ended up being subject to servitude and labor exploitation. While wide sectors of the population in rural and poor areas still see these as an opportunity for social mobility and access to education (and do not recognize them as forms of exploitation), “padrinazgo or madrinazgo” are officially classified as the worst form of FL and CL because they involve a clear use of violence and coercion. However, this is not necessarily the case for other forms of labor exploitation that do not align with cultural paradigms and practices.

For all the above, the evaluation team concludes that the project represents a very relevant initiative to fill some notorious gaps in knowledge, information, and awareness about FL in relation to different groups and audiences, as well as take a step forward to operationalize the ILO’s 11 indicators in FL. With regard to the public institutions and authorities that have responsibilities in this domain, the project represents an opportunity to expand knowledge and command on the subject and to start a dynamic of coordination and joint action, particularly at regional level, as will be detailed further. The evaluation team determined that the project is highly relevant: the project educates and better enables the different executive authorities (Ministries of Labor, Justice and Interior) to develop new mechanisms to combat FL. Further, the project enables the Peruvian justice system to enforce the new regulation. The project is not directly targeting the general public, but it is conveying messages that indirectly contribute to a cultural shift regarding behavioral and cultural patterns in relation to FL. Lastly, it plays an auxiliary role in assisting the corresponding authorities in dealing with cases of FL and protecting the victims.

3.1.3 Relevance of Project Strategies

The evaluation team found that the project’s strategies were relevant to the project’s participants, but observed some differences between the policy/central level (National Commission, Ministries and other independent institutions) and the grassroots/regional level (Regional Governments and justice operators in the Departments of Cusco and Loreto)

The project has adopted a combination of top-down and bottom-up approaches. The evidence gathered by the evaluation team so far indicates that while the latter generally has been successful the former has been mostly problematic. The evaluation team discussed some of the findings supporting this statement in the discussion of the previous question (nº1). The pivotal role given to the National Commission (NCFAFL) has constrained the trickle-down application of a technical proposal of Force Labor indicators. As explained earlier, the initial assumption made by the project was that the NCFAFL’s legitimacy and authority would help disseminate new messages and new practices, but this has not occurred. The NCFAFL⁴ is composed of 19 high ranked and bureaucratic institutions meeting three times a year and it has proven to be not very operative for the purpose of building consensus and effectiveness.

The stalemate created around the NCFAFL forced CHS to shift towards bilateral approaches with the member institutions of the National Commissions, in particular, the key Ministries (Labor, Justice and Interior) and autonomous institutions, such as the Specialized Public Prosecutor (FISTRAP). The National Police and the Public Defendant, although technically under the authority

⁴ http://www.mintra.gob.pe/trabajo_forzoso/cnlctf.html

of the Ministry of Interior and the Ministry of Justice respectively, have been targeted separately. The reactions and interest of these institutions towards the proposal of developing and operationalizing FL indicators (based on ILO's 11 indicators of FL) can be described as uneven and, in many cases, ambiguous. The high turnover of officers has been another factor that has hampered the continuity of the discussions with these institutions.

Through contacts with these institutions, the evaluation team has encountered different degrees of interest and willingness to take the project forward. The institutions welcomed the project's support and recognized CHS as a key partner to develop the agenda against labor and human exploitation, but beyond that formal endorsement of the project they all required that this support be customized to their specific requests. The development of the 11 ILO indicators into a disaggregated technical proposal including registers is not necessarily the main priority for many of them; without denying and rejecting the value of CHS proposal, they have shown interest in other products and services.

1. The Ministry of Labor (MoL), for example, as the leading institution in the subject, has expressed great interest in the four studies contemplated by the project, but the decision to endorse the development and operationalization of Force Labor indicators is subject to the collection of additional data and information. Some of these are expected to proceed from the four referred studies, while others are expected to come from the pilot survey⁵ on Force Labor prevalence being conducted by ILO⁶ in collaboration with the National Institute of Statistics and Informatics (INEI by its acronym in Spanish). The MoL remarked to the evaluation team that their main gap is related to knowledge about the problem (characteristics, dimension, etc.) and their main priority is to fill this gap before moving onto anything else.
2. SUNAFIL representatives highlighted that the institution would like to incorporate new tools to conduct search and finding operations, and, in this sense, they requested support to develop a geo-localization application to support their teams in the field. The development of the 11 Force Labor indicators was not put forward as a priority.
3. The Specialized National Prosecutor (FISTRAP) has interest in the training and capacity-building of its operators and in embedding this training into the national curricula of public prosecutors. Moreover, this institution expressed great interest in improving the registration system by linking the Strategic Information System on Human Trafficking (SISTRA) and the Registration and Statistics System for the Crime of Human Trafficking and Related Crimes (RETA) system, allowing them to have a more comprehensive follow-up of the victims' situation.
4. The Ministry of Interior and the National Police have expressed interest in training and improving the RETA system being used to register cases.

⁵ The survey was supposed to be delivered in September 2020, but due to the COVID 19 Outbreak the date of delivery has been postponed

⁶ This action is part of the ILO-Bridge project.

5. The Ministry of Justice and the Public Defender's Office⁷ has equally expressed interest in getting to support to train the public defendants with particular focus on ensuring the full protection of the victim throughout the whole process.

This brief summary illustrates that the interests and preferences of the different institutions are not homogenous nor fully aligned to the project's proposal. Based on their current statements, every institution requires a customized monitoring system for their specific needs, while the project's initial approach has been to fit all the institutions in the same FL monitoring system.

It is worth noting that most institutions have identified the following two situations that are hampering their efforts to take this matter forward.

1. First, the COVID-19 pandemic has closed some of these institutions over a period of two-to-three months during this current year. They have now reopened but are still operating with different types of restrictions, which could cause one task to take longer to be completed with limited resources. For example, the government still does not allow any face-to-face gatherings, and relocated the staff of some institutions to support addressing urgent pandemic responses.
2. Second, because of the political uncertainty, various high-ranked officials interviewed within the framework of this evaluation exercise stated that they have taken over their responsibilities recently and many of them expressed the perception of being only temporarily in office, until the next round of elections, which are scheduled to take place in 11 months. Under these circumstances, some of these individuals openly recognize their inability to plan and act strategically with a medium and long-term timeframe.

The evaluation team found that the situation at the regional/local level, with the operators acting at the grassroots level, has been much more receptive and responsive towards the project's proposal. With very slight differences, all of the stakeholders consulted (Regional Prosecutor, Police, SUNAFIL, Public Defendant and Regional Governments) have shown a higher degree of ownership, interest, and commitment towards the project's proposal and approach. According to their testimonies, the main virtue of the project has been filling gaps in knowledge and information about FL in the regions. These deficiencies prevented those in charge of prosecuting the offenses and enforcing the law from applying the right approach.

As discussed earlier, the bottom-up approach, the enlargement of technical and practical solutions to those practicing at the grassroots level, has proven to be a more workable method than the top-down approach, in which the agreements and technical guidelines would cascade from the National Commission and other national structures. The evaluation team found that the regional domain was much more pragmatic and less influenced by the political climate than the national domain. As a result, some interesting dynamics of coordination and joint action have been initiated that will be detailed further.

The difficulties encountered by the project to implement the top-down approach raised some questions about the efficacy of the consultations and appraisals conducted by CHS prior to the

⁷ Free Public Defense legal services for people who do not have economic resources or are in a vulnerable situation.

design of the project. The main question here is why the project found such elusive response from institutions that technically were supposed to benefit from the project and have agreed with the project's approach in advance. However, the evaluation team was not able to fully answer this question due to high government officials' turnover. Unfortunately, the informed national stakeholders, those who could have provided insights on the preparatory works conducted to design the project, were largely no longer working in those roles. The high turnover of officials has been, therefore, one of the main difficulties found by the project to obtain the endorsement and commitment of the governmental instances, since the project team had to start over and rebuild the working relations a few times.

The evaluation team has also been able to establish that CHS carried out consultations prior to the design of the project, and even after its approval the development of the Comprehensive Monitoring and Evaluation Plan (CMEP) and the Pre-Situational Analysis (PSA) represented opportunities to validate the assumptions. The evaluation team posits that the current reluctance and hesitation shown by the above institutions towards the proposal of developing and operationalizing FL indicators results from a combination of factors, of which the political volatility is the main one. Certain misgivings towards CSOs in leading public policies and more recently the shift of priorities due to the COVID-19 crisis also has contributed to the delays. In any case, the recount of priorities presented by the different institutions also begs the question if a unique proposal (All in one lump) being trickled down from the NCFAFL has been the most adequate approach to integrate this variety of requests. The current situation suggests that a more flexible approach providing tailor made solutions could be more realistic.

Some other issues remain to be discussed as well about the identification of critical assumptions that will be presented under Question 4.

Question 3: Given the country's context at mid-point of the project's implementation timeline, how relevant is the project's design? How are factors, such as the ongoing implementation of other ILAB-funded projects in Peru (i.e., the ILO Bridge Project), affecting the CHS project's efforts?

3.1.4 Results Framework

The Results Framework (RF) is technically accurate and precise, and the project team has expressed positive views about the way that this instrument helps CHS managers and technicians visualize the project's chain of results and streamline the actions. The evaluation team, however, understands that in the light of some of the analysis presented above, it might be advisable to introduce some adjustments so that the RF can better reflect the reality of the project.

What is this reality?

1. The shift towards the bilateral and regional levels. The references to the NCFAFL in several items of the RF have limitations and need adjustment. Since this structure is not necessarily going to be the only counterpart in the delivery, approval, and implementation of the different products and services there is need to expand the institutional scope. Under the current formulation, the target of many of the indicators under Outcomes 1 and 2 is not going to be met in the time the project has currently left and the realization of Outcome 1

acts as a precondition to implement the activities under Outcome II. Similarly, the technical definition of some indicators, as described in the CMEP, might need adjustments to clarify what can be considered or counted under the wording of the indicator.

2. Dynamics in progress are not necessarily well reflected on the Results Framework (RF). The evaluation team, based on the opinions and testimonies it gathered, understands that the training and mobilization effort is paying off in the form of more awareness and coordination among the regional stakeholders around Forced Labor indicators. These are dynamics that are not very visible in the RF. Again, this shortcoming might be related to the prominent role given to the NCFAFL in formulating the different items in the RF, a decision that obscures other achievements.
3. Adjust timing and deliverables. The evaluation team learned that the project's management still assumes it is feasible to deliver most of the outputs and achieve their corresponding outcomes anticipated in the RF. However, the evaluation findings do not suggest that this expectation is realistic within the remaining period of implementation (until December 2021). The evaluation team anticipates that the project might need an extension. If an extension is granted, the political environment and the variety of constraints and limitations encountered so far might still limit what the project can achieve. Based on the responses of the main national stakeholders, the evaluation team has some reservations about the possibility of effectively putting a FL Monitoring System in place and increasing the availability of FL data. These aspects will be analyzed in more detail below and under the effectiveness criterion.

3.1.5 Complementarity with Other U.S. Government and USDOL Funded Actions

It is possible that sporadic contacts between the teams of the CHS FL indicators project and the ILO Bridge project occurred, but these contacts have not led to any specific joint or coordinated action. Both management teams regard their respective projects as occupying different spaces and are not disputing any jurisdiction thematically or geographically. Both teams expressed their willingness to cooperate, although there is no explicit intention to search for options in a pro-active manner. Both projects converge on the agenda set by the MoL and it has been argued that it should be the role of the MoL to consider and propose further coordination if it deems it necessary.

CHS also has been implementing, with USAID funding, a sequence of actions against "Human Trafficking in the Amazonia." The last intervention within this series covered the period September 2018 to June 2020, but it has been granted an extension due to the COVID-19 pandemic's impact on the implementation. The evaluation team learned that a new proposal to continue this line of action is currently under discussion. It focuses on strengthening and capacity building public institutions with a mandate to combat this practice in Loreto, Cuzco and Madre de Dios, which are virtually the same institutions in charge of combating FL. There is, therefore, a geographic and operational intersection between the USDOL FL indicators project and the USAID Human Trafficking Project. The evaluation team has not explored in much detail how this complementarity is managed, but the stakeholders at the regional level usually refer to both lines of action as CHS work, without disaggregating FL from HT.

The evaluation team established that the project has limited interaction with the U.S. Embassy (Political Section). The Embassy officers know about the project, but due to staff rotations and

more recently the COVID-19 pandemic, it has not been possible to establish more regular contacts and enable the sharing of knowledge and points of view. The evaluation team understands that more regular contact would enable CHS to provide inputs for the undergoing policy dialogue between the Embassy and the different Ministries, something that eventually might turn into an opportunity to influence the development of policies in the direction desired by the project. The evaluation team learned that CHS has been contributing to this policy dialogue process in relation to the Human Trafficking issues via USAID, but it is believed that this is not the case with regard to FL.

Question 4: Have any changes to the national landscape impacted the critical assumptions and risks articulated in the Theory of Change? If so, does the project have a feasible strategy for adaptation?

3.1.6 Analysis of Critical Assumptions

The evaluation team understands that the project encountered difficulties in building consensus and reaching agreements with national institutions due to political instability, fragmentation, and volatility.

The project has conducted various checks to validate its assumptions but some of the stakeholders consulted still have argued that the Peruvian institutional environment offers little margin to institutionalize new processes. Stakeholders offered the following examples of limitations that are generally present and have to be duly considered as part of the critical assumptions and risk analysis: frequent staff rotations, limited budget, short-term vision and decisions based on personal preferences.

One of the most common flaws in project design is underestimating the severity and scope of these limiting factors. In fact, the PSA conducted a very thorough analysis of the conditions and limitations of the environment, outcome by outcome and institution by institution, and some of these have actually occurred. The PSA anticipated most of the constraints and conditions described in Question 2; accordingly, the evaluation team questions the actual effect of this exercise in mitigating the risks identified. Instead of thoroughly exploring what can be really done under these constraining circumstances and anticipating the most adequate strategy, it is usually assumed that the best-case scenario will allow the fulfilment of the project's Theory of Change. As it has already been anticipated under Question 1, one of the critical assumptions made by the project was that the NCFAFL was going to facilitate the process and become the entry point into the institutional framework, but the NCFAFL has been ambiguous about their interest and commitment to take the whole process forward.

The COVID-19 pandemic has delayed and added another tier of uncertainty to the process. Facing the impact caused by COVID is likely to be the top priority for most of the institutions and absorb most of their resources. The Ministry of Labor, according to some respondents, likely will devote a lot of time and energy to process the furlough schemes; there will be little budget left to support other activities.

The project is already adapting and assessing alternatives for the future. The evaluation team learned that one of the options is to readjust weights and emphasis between geographical and institutional levels, as explained. The team thinks that this approach corresponds more precisely

to what is actually happening in the project and will be a more flexible and realistic approach, but the expectation of having the Force Labor monitoring system fully in place providing reliable data and information for the justice operators might still be optimistic.

The evaluation team observed that most stakeholders have adapted well to remote work, and after two or three months of initial bewilderment, it has been possible to incrementally resume the program's activities. Meetings, trainings sessions, and studies are in progress and, to a certain extent, the pandemic has optimized certain processes. The course of the pandemic and its long-term consequences remain unclear; and it doesn't seem realistic to expect big commitments and pledges from the main national institutions.

3.2 Effectiveness and Efficiency

Question 5: How effective has the project been thus far in achieving its objectives? What factors have influenced or impeded the achievement of the objectives? What factors are driving and/or hindering the timeliness of results so far?

3.2.1 Summary of Main Achievements

The evaluation team's findings on this question are in line with answers to the previous questions. The team will elaborate on the results here in a more structured manner.

First, the evaluation team observed that overall the implementation process and the delivery of outputs have been delayed because of the following factors:

1. The time devoted to developing the CMEP: Although the project team generally agrees that the CMEP has been worth the time that it has taken to develop, approximately the first 10 months of the implementation period were devoted to this task. Per DOL policy, there is no restriction to move ahead with the project activities while developing the CMEP. However, this option was not duly considered by the project, and the project did not make any significant progress in its implementation during this period.
2. Difficulties in building consensus with the NCFAFL institutions around the project's activities, as explained earlier.
3. The COVID-19 pandemic's interference with project activities, from March 2020 onward.

Due to the above factors, the delivery of the project's products and services (milestones, outputs and outcomes) is behind schedule. In some cases, as already explained, the project team might need to conduct a review of their scope to adjust them to the current circumstances. The evaluation team presents the project's Results Framework (RF) with the assessment of the achievements in [ANNEX A](#). This document shows that many of the outputs under outcomes 2 and 3 have not been delivered yet. For example, the technical proposal for the development of FL indicators, its approval and further operationalization, the alert and reporting platform, the toolkit for the referral of victims, are some key outputs that still have not been delivered.

The evaluation team found that the project has made some progress on such items, which is presented below with some complementary analysis.

Advocacy work and policy influence

Because of the fraught political environment, the project has had difficulty at the policy level gathering explicit and unequivocal support from the main institutional partners. Nevertheless, the evaluation identified that the project has made some important achievements. For example, as a result of the advocacy work conducted by CHS, the III National Plan against Force Labor (2019-2022) has included references to FL indicators, meaning that organizations in charge of implementing the III Plan must use them.

CHS has extended its advocacy work to the National Congress and obtained preliminary support from some members to enact five new laws. Two of them already have been processed by the justice permanent commission: (i) Bill to unify the existing 18 typified modalities of exploitation under one unique modality of human exploitation and (ii) Bill for the civil protection and reparation of victims of human exploitation. The other three initiatives in the pipeline, according to National Congress sources, are: (iii) the creation of the National Observatory on Forced Labor issues, (iv) the allocation of budget line in the National Budget for the implementation of the III National Plan; and the (v) the approval of Internet filters for pornographic websites. Bills (iii) and (iv) are directly related to the work carried out under this project.

Agreements with Public Institutions

The project has signed collaboration agreements with various public institutions that provides training and technical assistance, as well as include development of instruments and /or the completion of mappings and other preparatory studies. Those institutions are as follows are:

- The Ministry of Labor and Employment Promotion (MoL) to complete the delivery of four studies and support for the implementation of the III National Plan for the Elimination of Force Labor.
- The Ministry of Justice and Human Rights (MINHUSH) to update DATAMART system and train “Public Defendants”.
- The Public Prosecutor to update the SISTRA system and train Officers.
- The Regional Governments of Cusco and Loreto to develop the Regional Observatory and train the justice operators

Four preliminary studies conducted to prepare to set-up a monitoring system that includes Forced Labor indicators

These four studies are:

1. Mapping study of government institutions that have services focused on the prevention, detection, care, and reintegration of victims of forced labor, as well as social programs that serve the country's vulnerable populations.
2. Study of barriers that prevent the adequate understanding and application of forced labor indicators, including analysis of normative competencies, organizational structure, problems and barriers to collaboration among stakeholders, and training needs of the actors.
3. Inventory of government institutions that have information systems to record cases or reports about forced labor or trafficking in persons for the purpose of labor or sexual exploitation, incorporating their respective variables and content.

4. Design a system that records the actions of the government concerning the reintegration of victims of forced labor, in order to monitor the situation of the victims until their final stage.

The evaluation team has had access to the preliminary versions of these four studies. They contain thorough analysis and exhaustive data about the areas studied. The mapping study, for example, has identified 58 programs that include services with the potential to contribute to the fight against Forced Labor and Human Trafficking. Forty-six of these programs are under 16 Ministries of the executive branch, 3 under the judiciary, and 9 under the scope of autonomous entities. Likewise, the proposal for the system to record reintegration actions conducted for victims, contains the different options and the conditions to be given in each case to achieve the interoperability of the information systems. The evaluation team will not provide a detailed analysis of these studies here, as it is beyond the scope of work of this evaluation. However, the team foresees that they represent solid bases to reassess the different options available for the project to increase its work with the different institutions.

Achievements at Regional Levels

At the regional level, the project resulted in positive dynamics in conducting the training, mobilization and promotion of joint coordination. All of these activities were adequate and generated very positive effects.

- Forced labor sub-commissions were created in Loreto and Cusco. The evaluation team assessed that the regional stakeholders cohered around FL as a differentiated line of action from HT. The evaluation team has gathered some examples of coordinated actions against FL.
- Intense training efforts have raised more awareness among the justice operators. The evaluation team gathered testimonies that refer to more knowledge and expertise available at institutional levels to tackle FL.
- Self-replication experiences were initiated in both departments using existing networks: the Peace Courts network in Cusco Department (reached out to 283 judges) and the Social Departments of 53 local governments (Municipalities) in Loreto.

Other initiatives are in progress:

- The project has appointed the group of specialists in charge of developing the technical proposal on FL indicators. The first draft of the proposal is expected for the first quarter of 2021.
- A technical proposal is being explored to set up a Regional Observatory of FL in Cusco as part of the agreement signed between the Regional Government and the CHS. This observatory is meant to collect, document, and disseminate information related to FL issues in the region. A consultant has been appointed to develop the structure and contents of this instrument.

3.2.2 Monitoring and reporting of results / achievements

As per standard procedure, projects funded by USDOL/ILAB are required to apply a CMEP, which is an instrument that compiles the different analyses and procedures applied during the implementation process: Analysis of Problems, Theory of Change, and the Performance Monitoring Plan (PMP). In the latter document, the project details, based on its objectives and

outcomes, the indicators (quantitative and qualitative), the measurement approach (definitions), data sources, frequency of data collection, those responsible for reaching each indicator, and the analysis for each project component. The PMP serves to monitor and evaluate the project at its various levels and all of its activities. The evaluation team found the CMEP, and the PMP in particular, to be useful instruments. During their elaboration, the project team had the opportunity to analyze the intervention in great detail and anticipate the path that the project should follow to achieve its objectives

One of the outputs of the PMP is the Technical Progress Report (TPR), the document that is produced every six months to report on the progress made regarding the RF. It includes a spreadsheet ([ANNEX A](#)) that memorializes data processing, compilation of the indicators, and reporting of results to the TPR. This document is the quickest way to get a snapshot of the project's achievements with regard to the different indicators.

Despite the technical robustness of these instruments, the evaluation team found that the TPRs delivered so far do not reflect properly the project's reality and complexity. Generally, the TPRs delivered up to April 2020 reflect a negative view of the project's performance. This assessment is supported by facts, like those discussed earlier about the project's difficulties to reaching agreements with NCFAFL and how this has hampered the delivery of various outputs under Outcomes 2 and 3. Having said that, the evaluation team found that the early TPRs did not fully reflect the roll out of the activities at the regional level. The evaluation team hypothesizes that the project in the regions was still building up and had just come to fruition during this last period. The latest TPR corresponding to October 2020 was delivered after the fieldwork of this evaluation and has not been included in this analysis. Another plausible explanation could be that it was an oversight from CHS to report on these aspects.

The evaluation team found the TPRs' summary of achievements in Annex A to be a very thorough instrument, but again, it did not necessarily reflect the full picture of the project's reality or its intricacies. One of its shortcomings arises from the inadequacy of the RF to properly reflect the training, awareness, and coordination effort that is being made at regional level.

The CHS monitoring team, despite its endorsement of the instrument, is having difficulties reporting meaningful information for each of the 45 items composing this matrix, many of them of a very similar nature and description. The evaluation team noticed that in many cases the same output is reported several times in relation to different indicators, something that might be reflective the repetitive character of some of the elements in the RF. By definition, milestones reflect the transition from one stage to the next, but in some cases, they have been worded reflecting very little differences, for example: (i) "Institutions agree"; (ii) "institutions validate" and (iii) "institutions approve" or (i) "institutions agree to coordinate" and (ii) "institutions agree to establish FL monitoring groups". In many cases, the reality is not so nuanced, and the only option is to report the same item three times. Milestones can surely help establish the stage of a process, but they also bring more complexity and require an extra effort in terms of monitoring. It has to be noted, as well, that the third milestone implies the fulfilment of the two previous ones and in some cases, using only the third milestone would be a way of simplifying the reporting.

In some other cases, the only option to report some results is to make a flexible interpretation of the technical definition of the indicator. The evaluation team found that the summary of achievements of the TPRs is at times a bit repetitive and not necessarily reader friendly.

Given the current state of affairs, these instruments might present the reader an outdated view of the project. The evaluation team found that the project is taking a slightly different direction than originally anticipated. The evaluation team has come across a simplified matrix that has been included as a section of the sustainability strategy. For the purpose of communicating the project's achievements, this matrix is perhaps more telling and better summarizes the project's reality than the extended and detailed version of [ANNEX A](#).

Question 6: How do the project's stakeholders perceive the project's efforts and contributions toward combatting forced labor and labor trafficking in the target areas (Cusco, Lima, Loreto)?

3.2.3 Stakeholders' perception

Most of the stakeholders' perceptions of the project are mixed with their perceptions of CHS work around human exploitation issues, in particular human trafficking and sexual exploitation. CHS is perceived as a very supportive, skilled, and committed organization working on those issues and the stakeholders, in general, do not differentiate their views for one specific line of action against the other. The national stakeholders have a general mandate to cover all these topics and equally perceive CHS's work as a whole.

However, stakeholders generally acknowledge that the FL is a new legal figure in the Peruvian system. CHS has played an instrumental role in bringing awareness to it and developing an agenda to prevent it by prosecuting and protecting the victims. This is particularly recognized at the regional level where CHS has a well-known reputation in these thematic areas. Local operators highlight CHS's key role in providing technical assistance to improve planning and coordinating around combating FL and supporting the victims. They also highlight that the project has helped them recognize the specificities of forced labor compared to human trafficking and to develop the corresponding structures and procedures to act accordingly.

At the national level, CHS's reputation and expertise is well recognized, especially with regards to filling technical gaps, improving processes, providing training, developing tools, etc. Several stakeholders described CHS's approach as very comprehensive, including the "three Ps" (Prevention, Prosecution and Protection) and covering a wide array of actions ranging from direct attention to the victims to the elaboration of inputs to develop the regulatory framework, an aspect highlighted by sources from the National Congress.

The evaluation team also ascertained that CHS's role is perceived at times to be controversial, since the organization is usually active in the public arena and in the media commenting on sensitive issues. One of its main and regular deliverables is the "Civil Society Alternative Report," an assessment of the state's progress in fighting human trafficking. CHS's role in monitoring, influencing, and reporting on public policy might generate mistrust among public institutions. No specific issues of this nature have emerged regarding this project, but some respondents provided this as contextual information that should be taken into consideration.

Question 7: Has the project caused any unintended results on its target communities and participants at the mid-point of the project's implementation timeline? If so, what were they?

3.2.4 Unintended Results

The evaluation team did not have direct contact with communities during the evaluation because of the nature of the project's activities and the remote character of the exercise. The stakeholders that the team consulted did not report unintended effects at the community level and at any other level. Regional institutions' reaction was that the project exceeded their expectations. As previously explained, the evaluation team found some compelling examples of replicating initiatives streaming from these initial processes. There are preliminary signs that the training and transmission of messages to the structures at grassroots levels (municipalities, peace court judges) resulted in better alert and protection systems. For example, informants from Loreto reported to the evaluation team that they received more inquiries from isolated districts that received some essential information about the indicators of FL.

The evaluation team recalls some of the comments presented in the previous question N°6 related to the stakeholders' perceptions of the project. Beyond its specific Result Framework, the project is another CHS action and it has helped to reinforce the auxiliary role that the organization plays to support the public institutions and the justice operators in fulfilling the mandate of preventing and prosecuting human exploitation and protecting its victims.

Question 8: How are factors related to project management and design, including designation of key personnel and staff capacity, affecting efficiency efforts? Are there any relevant efficiency challenges (human/financial/etc.)?

3.2.5 Project Management

Unfortunately, the evaluation team's interaction with the project team was limited by the remote modality applied during the fieldwork phase of this evaluation. The project team was unable to directly observe the project team and the management dynamics.

The project team is composed of 13 people, including CHS executive director. The organizational chart shows that the team has good coverage of technical areas (education, labor and communication) and administrative areas (administration, accounts and secretary). Two regional teams (Cusco and Loreto) each have two people and one project director in charge of the overall management. The project team is competent and supported by national and regional institutions/stakeholders.

The evaluation team observed different planning dynamics. In some cases, they refer specific areas of intervention, such as communication or advocacy, and in some others, they refer to the projects or the regional level. The team's analysis of these plans revealed that while the former ones, for example advocacy, are detailed and founded in an exhaustive analysis, the regional are basically a matrix with the plan of activities for the month or the quarter.

CHS has designated different teams for the seven projects currently underway.⁸ Some issues have been raised about projects/lines of action sharing or exchanging human resources. Indeed, the regional stakeholders interviewed by the evaluation team referred to the CHS teams and experts hired by this project as dealing with issues concerning other themes, particularly human trafficking and sexual exploitation. It is possible that staff hired by one project support actions from another project.

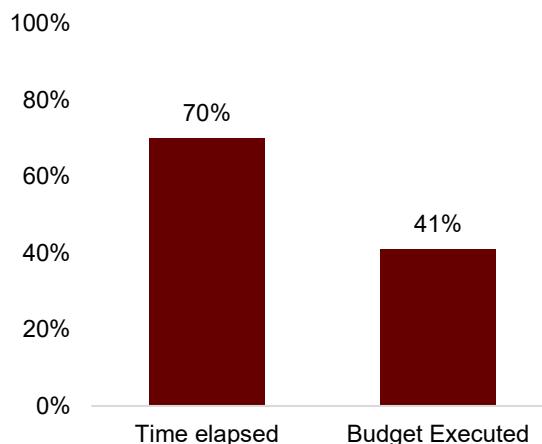
The evaluation team could not establish the scope of this practice and the extent to which it impacts the efficiency and effectiveness of this particular project. Themes are interconnected and the optimization of human resources might be a good practice in terms of generating internal synergies and improving global efficiency. There is not enough evidence to assert that resources from this project were being diverted and so undermined the achievement of results.

Question 9: How is the allocation of the project's budget/actual expenditures/burn rate affecting efficiency efforts?

3.2.6 Implementation capacities

While 70 percent of the implementation period has been completed (34 of 48 months), only 41 percent of the budget has been spent (October 2020). This difference is reflected in the following chart.

Exhibit 5. Time Elapsed vs. Budget Executed



Monitoring and Evaluation, Travel and Direct Costs are the three budget lines showing lower percentages of expenditures with 6 percent, 13 percent and 10 percent respectively. Personnel with 55 percent and Fringe Benefits with 47 percent of expenditures are also low, but more in line with the elapsed time.

There is a situation of under-expenditures, partly due to the COVID-19 pandemic that cancelled all the travels and their associated expenses. However, COVID-19 aside, the distribution of expenses is still showing significantly low figures in relation to the direct costs. According to the

⁸ <http://chsalternativo.org/proyectos/proyectos-vigentes/>

findings this could most likely happened when the project was not able to reach a consensus with national institutions to implement the planned activities. As a result, they did not spend the associated costs so that is why the figures show low numbers.

Human and financial resources have been available on time and no specific issues have been found regarding the correspondence between the needs and the resources available. There has been a short period of impasse due to the resignation of the M&E officer coinciding with the manifestation of the COVID-19 outbreak, but the vacancy was filled relatively quickly, and no major disruption has been caused to the follow up monitoring work. There have been mechanisms in place to monitor the inputs (procurement), control the expenses, and ensure their eligibility.

3.3 Sustainability

Question 10: What is the level of participation of the various stakeholders, their degree of commitment to the project's execution, and their contribution towards the project's objectives?

3.3.1 Involvement and Participation of Stakeholders

Regional institutions have seen that the project presents an opportunity to increase their knowledge in the subject and to improve their collective organization through the regional networks. The evaluation team observed that regional institutions are genuinely grateful for the project's outreach and they are looking—within their limits and constraints—for alternatives to take the process forward and expand its effects.

Ministries and institutions at the central level have been more reluctant to commit to the project's proposals, as already explained. Formally, they express interest in having in place a FL Monitoring System, but other themes and other timing usually emerge as their main priorities. Their degree of ownership in relation to the project can be described as uneven. The NCFAFL has not acted collectively and the different Ministries have put forward their specific requests to the project. Some of these institutions recognize that they are constrained by the political moment and are unable to act with a medium and long-term view.

Question 11: To what extent are the project's plans for sustainability adapted to the local level, national level, and capacity/interests of implementing partners?

3.3.2 The Project's Sustainability Strategy

A sustainability strategy was one of the deliverables requested in the cooperative agreement. The strategy points towards identifying the outputs, outcomes, and processes promoted by the project that can be linked or integrated into the routine of existing structures or policies: the set of indicators, the training curricula for specialized prosecutors, and adjustments to the registration and information systems. From the technical point of view, the project is not planning to deliver products and services out of the range of capabilities of the national/local stakeholders and from the financial point of view they are not deemed to require significant budget allocations, but mostly organizational decisions. The monitoring system could become institutionalized and routine under the general budget of the Ministries involved.

Some other processes or outcomes are expected to be integrated into the dynamics of the target groups and translated into new patterns of behavior. For example, the knowledge about FL,

awareness, and changes in the socio-cultural paradigms are self-replicating processes in that the knowledge about different topics and changing attitudes could continue with their own dynamic. This is particularly the case at the regional level, where the knowledge and expertise provided by the project could be embedded into institutional practices. Likewise, changes in the regulatory framework remain and continue to produce effects while they are in force.

Bearing all of the above in mind, the scenario outlined in the sustainability strategy might reflect a realistic scenario, but there are other issues of a political and organizational nature that should be taken into consideration, which the evaluation team addresses in its answer to the next question.

Question 12: Are there any risks or opportunities that are likely to limit or facilitate the sustainability (technical, financial, economic, social, institutional, and environmental) of the project's results?

3.3.3 Risks

There are different factors that might impede the project's sustainability and the continuation of the project's effects.

First, the political climate and the ambiguous and mixed response received from the institutions at the policy and central level: the MoL, the MINJUSH, SUNAFIL and all the rest of institutions integrated in the NCFAFL. These institutions have not explicitly endorsed the proposal of developing and implementing a monitoring system with FL indicators, and to greater or lesser extent, most of them propose alternatives and/or raise different kind of conditions. At the time of conducting the evaluation study, there is no conclusive evidence leading to the expectation that the development of a technical proposal is going to trigger the gradual buy-in and interest in the process by these institutions. There are external factors, such as the prior completion of the pilot survey on FL prevalence required by the MoL, that is not under the project's control. Moreover, the time remaining to implement the project is limited, the course and aftermath of the COVID-19 pandemic remain unclear, and the current political environment is not conducive to ambitious reforms. Matching the project's proposal with the interests and expectations of the national partners will require some time and effort.

Second, the scale of the dynamics initiated at regional level. There are signs that a first layer of institutions and officers in Cusco and Loreto have been introduced to the concepts and criteria to identify and tackle FL and that they are trying to translate these new ideas into practice. However, both departments are challenging territories at the time of introducing reforms, particularly Loreto, due to its vastness, isolation and geographic characteristics. Resources are scarce and many of the stakeholders expressed their frustration about the difficulties that they encounter when spreading the message across and exerting their authority over the entire territory under their jurisdictions.

The testimonies gathered indicate that, despite the good will and motivation of the justice operators at departmental level, these experience great difficulties and challenges in reaching out to the districts and monitoring what is happening in distant and isolated areas, where FL violations usually occur. Some interesting initiatives have been reported to the evaluation team, such as liaising with forestry auditors to act in a coordinated fashion, but they are still presented as small-

scale initiatives. Despite these efforts, the specialized prosecutor (FISTRAP) in one of the Departments, reported to the team that in two years his office had not processed one single case.

Stakeholders at regional level confirm that CHS has well-established teams and proven capacities in both regions, and there is no evidence to suggest that the geographical coverage of project has overstretched the organization's capacities. It is probably beyond the project's scope to provide coverage to the whole territory in just a single region; it is a task that remains to be completed by the regional stakeholders. However, it seems evident that reaching out to a critical mass remains as a key challenge to achieve the project's objectives and trigger a sustainable effect.

Some stakeholders have also referred to the socio-cultural risks, in the sense that even if the regulatory framework evolves and the institutional capacities increase, there is still a great deal of acceptance among wide sectors of the Peruvian society around the positive character of certain forms of exploitation such as the "Padrinazgo/Madrinazgo." For these stakeholders, these forms of FL are not being properly addressed yet and there is a need to put more emphasis on the prevention and elimination of those "culturally accepted" forms of exploitation.

Finally, there is a lack of knowledge and information about the FL problem and limited expertise available in-country. Several stakeholders have referred to this gap in knowledge and expertise to potentially explain the inaction of some institutions, particularly at the central level. The evaluation team confirms that representatives of some Ministries recognized their limitations in this regard: "before we act, we want to know." Two of the four components of the ILO-Bridge project are meant to address those gaps, as are the four studies delivered by this project. It is reasonable to expect that in a few more years, this gap will be filled, and policy makers will have more tools and methods at hand to address these limitations. Meanwhile, this is a constraint that cannot be underestimated.

3.3.4 Opportunities

The evaluation team has noticed great motivation and enthusiasm on the side of the justice operators, particularly at the regional level. Despite the limitations just presented, in both departments, the institutions have shown an interest and desire to act against FL and HT. When acknowledged, the fight against these crimes generates a great deal of adherence from different sectors of the society and the institutional spectrum. The lack of knowledge and resources presented above are obviously big constraints, but the willingness and determination of those in key positions could inspire imaginative formulas and alternatives within the existing conditions.

4. LESSONS LEARNED AND PROMISING PRACTICES

During this interim evaluation, the evaluation team gathered lessons learned and promising practices from interviewees' perspectives, CHS progress reports, and the evaluators' analyses. The lessons reflect learning from both CHS successes and limitations; and the promising practices represent approaches or intervention strategies implemented by CHS. These practices are worthy of replication since they could potentially increase the project's effectiveness and impact, as well as contribute to the sustainability of the processes initiated.

4.1 Lessons Learned

- The analysis of risks and critical assumptions needs to thoroughly consider alternative strategies out of the best-case scenario. The design and preparatory phases have served to accurately identify the constraints faced by targeted institutions. However, the analysis of alternatives that follows most likely underestimated the severity of those constraints, as well as the likelihood of the risk factors that could happen. Mitigation measures usually assume that they can be easily overcome by advocating and being persuasive, but this is not necessarily the case when a project operates in a highly politicized environment and the institutional dynamics are complex and very fragile. The project should consider options out of the best-case scenario, while being realistic about the existing limitations. It should also further consider what can be done in an environment that is not necessarily conducive to change.
- The bottom-up approach (i.e. the generation of change from the grassroots level) might be a realistic option to introduce new procedures and practices when building consensus at the policy level seems unlikely to achieve the project's objectives. Regional/grassroots level institutions can be more pragmatic and willing to improve procedures than the national institutions that are constrained by their political agendas and bureaucratic procedures.
- The Results Framework should anticipate and avoid bottleneck situations where one of the Outcomes/Outputs is placed in such a critical position that its fulfilment virtually becomes indispensable and essential to continuing the sequence of intervention. Although the complementarity between outcomes represents a key feature of logic systems, it seems advisable to maintain some degree of autonomy between components or some pre-identified alternatives to operate, in case the key outcome is not fulfilled. This seems to be the case that occurred regarding Outcome 1 in the RF. The design and approval of the monitoring system for FL indicators by the NCFALF represents a milestone that conditioned the subsequent delivery of many outputs under Outcomes 2 and 3. Many of the Outputs under these two outcomes have been conceived and formulated in such a way that they can only be delivered if the monitoring system has been approved. In practice, CHS has looked for alternatives for this constraint by expanding and placing more emphasis in the regional level despite the difficulties found with the NCFALF and its members at the central level. The issue that emerges in this case is that this alternative is not necessarily the itinerary reflected in the RF.

4.2 Promising Practices

- The use of existing networks and structures at community levels to disseminate the message and improve the monitoring and surveillance capacity against Forced Labor. Even if those structures do not necessarily represent the justice operators, they can still play a very important role in preventing cases of FL and protecting victims. Examples of these practices have been found in both Departments of Cusco and Loreto with the training and awareness raising of 283 Peace Court judges (Cusco) and the Social Action teams of 53 district governments (Loreto). Some of the operators also refer to contacts and liaisons with forestry auditors.
- The capacity building of the justice operators by using real case studies instead of theoretical and abstract modules in academic style. The regional stakeholders have expressed very positive views about the training methodologies that were based in the discussion and resolution of practical cases. This approach helped the trainees better understand and visualize the applicability of the training to their own daily practice.
- The comprehensive support provided to the justice operators and other stakeholders at the regional/local level. Local stakeholders highlighted the fact that the project did not limit its support by providing only lectures or theoretical advice, but also follow-up on cases and brought attention to the victims. This practice has been described as very useful in portraying the whole cycle of intervention against forced labor.
- The use of inputs from grassroots work to feed advocacy and policy influence. The evaluation team gathered testimonies that reflect this itinerary: lessons learned and reflections emerging from the grassroots level served to expand upon inputs for communication and advocacy campaigns. This project together with other similar projects conducted by CHS have been able to generate proposals and ideas to improve the regulatory framework that emerges from the daily practice of the justice operators. Political actors, such as National Congress members, have expressed positive views about the possibility of establishing these linkages between the two levels: direct action and political action.

5. CONCLUSIONS

In this section, the evaluation team presents conclusions about the project's performance with regard to each of the evaluation criteria: relevance and coherence, effectiveness and perceived impact, management effectiveness, and efficiency and sustainability.

5.1 Relevance

- **The project “Promoting Better Understanding of Indicators to Address Forced Labor and Labor Trafficking in Peru” is a relevant intervention within the context of the fight against Forced Labor in the country.** FL is a novel concept in Peruvian Criminal Law and, thus, it represents a challenge for the justice operators who do not possess the technical knowledge or the methodological tools to enforce the new law in an effective and consistent manner.
- **The focus on indicators.** The specific focus on the indicators of FL addresses one of the main gaps encountered by the national stakeholders when applying the new legal framework.
- **This logic of the RF has not been easy to translate into a workable or realistic program of activities.** The operationalization of the three outcomes has proven to be more problematic than initially expected, particularly due to the failure of the assumptions made with regard to the interest and commitment of the institutions at the policy and central level. The pivotal role assigned in the project strategy to the NCFAFL constrained the implementation of the program's activities. The bureaucratic and highly politicized nature of this structure impeded the necessary consensus building and roll-out the sequence of activities. Likewise, Ministries and other independent bodies at this level, although they formally endorsed the project's objectives, appeared ambivalent and reluctant to develop FL indicators. Most of them expressed other priorities and presented other demands to the project. As it stands, the RF of the project still reflects the overall project Theory of Change, but it might require some adjustments to better reflect the project's current situation, in particular the shift towards the regional level adopted by the project strategy.
- **The bottom-up approach, the program of actions implemented at the regional level, has been adequate to meet the needs and expectations of the stakeholders.** Regional governments and justice operators at this level have engaged more actively and showed more ownership towards the project's proposals.
- **Complementarity and inter-action with other USDOL and/or U.S. Government funded projects.** The CHS indicators project technically complements other interventions funded by USDOL (the ILO-Bridge project) or USAID (Combating Human Trafficking). Interaction is more explicit and evident with the USAID-funded project, since both projects are being implemented by CHS. The national stakeholders perceive that there is a continuum and they both represent the CHS work. With regard to the ILO-Bridge project, the evaluation team observed that the project teams have been in contact and exchanged information about their respective actions. However, the projects have not yet formally agreed to collaborate.

5.2 Effectiveness

- **Delays in the delivery of the project outputs:** The delivery of the different outputs has been delayed by different factors discussed in the report (e.g., little progress in the implementation during the elaboration of the CMEP, difficulties in reaching agreements with the main partners, and the effects of the COVID-19 pandemic). There are some key outputs under outcomes 2 and 3, more specifically the technical proposal for the FL monitoring system and other associated products (training and materials) that remain in progress.

The evaluation team nevertheless identified results and attributed preliminary effects to them.

- **At the national/policy level:** The advocacy work conducted under the framework of the project has been successful, and has resulted in the III National Plan against Forced Labor including a reference to the application of FL indicators. The project also mobilized members of the National Congress to undertake legislative initiatives related to FL issues. Agreements have been signed with various ministries to provide different type of services, mainly training and improvements of the registration platforms.
- **At the regional/grassroots level:** At the regional level, an intense effort of mobilization, articulation, and capacity building has been carried out by CHS resulting in new coordination structures, more knowledge, and motivated teams. There are examples of new initiatives undertaken jointly by the regional governments and the justice operators, such as the set-up of FL sub-commission within the regional networks, the elaboration of a proposal for a regional observatory on FL issues (Cusco), and the replication of experiences toward the district and community levels. The evaluation team has collected positive testimonies from the regional stakeholders regarding how the project has provided them with better understanding and knowledge about FL indicators. There are also signs that this support has enabled more coordinated and articulated efforts, but the evaluation had difficulties assessing the extent to which this collective effort increased actions against FL.

Other actions in progress:

- **Status of the FL monitoring system.** The project recently delivered the four preparatory studies meant to serve as basis for the elaboration of the technical proposal on FL indicators. Simultaneously, the group of specialists completed work on the technical proposal on FL indicators; the first draft is expected during the first quarter of 2021. The project team considers that these two products, the studies and the technical proposal, will enable them to open a new chapter in the negotiation with the key institutions, fundamentally the MoL, and will pave the way for a gradual implementation of the FL monitoring system across the institutional landscape. The evaluation team has misgivings about the feasibility of this assumption. At the time the evaluation team drafted this report, the international media announced that the Peruvian National Congress removed President Martin Vizcarra from office. Reports indicate that a new cabinet will have to be appointed in the next few weeks. This means that the project will have to renegotiate with the different ministries and begin lobbying efforts again.

Summary assessment of the project's effectiveness:

- The evaluation team's overall assessment of the project reflects the divergence in performance between the national/policy level and the regional/grassroots level. The evaluation team found that the project made some interesting and promising inroads at the regional level, which was not communicated effectively in the TPRs delivered up to April 2020. The evaluation team attributes this to the project team's difficulties communicating the project's strategy and reporting its intermediate results to USDOL. The evaluation team attributes these difficulties to language discrepancies and translation, and to the lack of clarity and precision in the documentation presented.

5.3 Sustainability

The evaluation team's analysis indicates that the project has a path to sustainability, despite some inherent challenges. In general, the project channeled most of its efforts towards strengthening the public sector, targeting institutions that are already in place, running their own programs, and are covered by the national budget. The project does not expect to set up new structures but instead aims to improve the performance of existing ones by providing new instruments and developing new routines. This approach is likely sustainable; there are, however, other factors that could hamper the success and continuity of these efforts.

Sustainable approaches:

- Many of the project deliverables can be integrated into the routines and practices of existing institutions. Strictly speaking, when these products and services have been appropriated, they likely will not require significant budget allocations and could continue delivering results or producing effects as part of the regular functioning of the incumbent institutions.
- Some of the outcomes resulting from the training and sensitization efforts (more knowledge, more awareness, etc.) can change patterns of behavior and/or trigger cultural shifts among organizations and institutional networks and thus have the potential to become self-replicating processes.
- There are also positive signs emerging from the willingness and motivation shown by the regional stakeholders to continue this process. The project has accurately matched some of their main needs and expectations, and despite all of the limitations that they face, they are willing to search for imaginative formulas and adopt organizational decisions to move on with this agenda.

Impediments to sustainability mainly relate to political, socio-cultural, and technical factors:

- First, the evaluation team recognizes that the political environment when combined with the social and public health situation is not conducive to ambitious reforms. The political landscape is very uncertain and emerging from the COVID-19 pandemic likely will require significant energy and resources from public institutions. The program likely will have to conduct a thorough exercise to adapt the expected outcomes to the current circumstances and exigencies.
- There are additional challenges related to the prevalence of some cultural paradigms that impeded communicating the project's message and generating surveillance mechanisms at community level. Some stakeholders have referred, in particular, to practices such as

the “Padrinazgo/Madrinazgo,” that, according to their views, are still widely accepted in some parts of the country and are not recognized as a form of FL.

- The lack of knowledge and expertise is another aspect that might hamper the project’s effort to implement and fully operationalize the monitoring system on FL issues. The absence of knowledge and tested models of intervention can cause inaction on the part of the authorities, and the shortage of experts, as well as the reduced trajectory of research, could limit the options available to develop these new models.
- Finally, it is important to note that, although the project has generated very positive dynamics at the regional level, those dynamics mostly remain very localized, confined to the administrative centers. The trigger of an effective and meaningful impact would require to scale-up the process and reach the critical mass at regional level, something that in Departments such as Loreto and Cusco is likely to require a sustained and persistent effort.

6. RECOMMENDATIONS

The following recommendations are directed to CHS Project staff and USDOL to strengthen the long-term sustainability of project outcomes, or to improve future programming of child labor projects.

6.1 Immediate Recommendations for CHS Staff:

1. Conduct a comprehensive reassessment of the different options available to implement the FL monitoring system and make it fully operational.

The reassessment should include the following:

- ▶ A realistic appraisal of the current political, social, and public health circumstances. Based on recent developments, it appears that new ministerial teams are likely to be appointed and this could significantly impact the project's ability to roll out the monitoring system.
- ▶ A careful and exhaustive analysis of the options and recommendations put forward by the four preparatory studies recently delivered. The evaluation has not been able to carry out this exercise, but it has been possible to establish that they contain detailed data and information about the institutional programs and mechanisms. This information will inform decisions about how to go implement the project.
- ▶ The willingness and unequivocal commitment of key institutions, such as the MoL, to endorse and appropriate the system.
- ▶ Time requirements to implement the whole process. As explained earlier, the 14 months left in the funding likely will be insufficient to execute the remaining program activities. The evaluation team anticipates that there will be a need to request a time extension.

The evaluation team has not gathered sufficient insights into institutional dynamics, and we are not in a position to outline the specific details of the approach that the project should follow in this regard, unfortunately. This recommendation basically emphasizes the importance of looking for alternative options, including downsizing the scope of the initial target, if needed. Adopting a flexible approach and focusing on the specific requirements of the institutional partners should be an option to consider if the technical proposal for the FL indicators and monitoring system is not clearly endorsed by the incumbent institutions. The initial assumption that a common FL monitoring system could be incorporated as "one-size fits all" by the NCFAFL institutions, it might not be realistic and there might be a need to search for alternatives.

2. Consider adjustments to the Result Framework (RF) to better reflect the reality of the project.

After conducting the reassessment recommended, the project team should consider some adjustments in the RF if the targets are reviewed, and the weight of the different components rearranged. In any case, the evaluation team recommends that the project refine or reformulate some of the elements to better reflect the actual shift towards the regional space and visualize the training and awareness efforts which take place at this level. References to the NCFAFL and the FL monitoring system might also need some

adjustments since the project has in fact shifted towards providing different types of technical assistance and support aimed at improving institutional action against FL, not necessarily focusing in setting up the FL monitoring system through the NCFAFL.

The rationale and justification of this shift should be thoroughly described and presented in the upcoming TPRs. Beyond rewording the different elements of the Logframe by adding a reference to the regional scope, the project would benefit greatly if CHS makes an effort to justify and describe this shift in detail. This will also enable the USDOL to reconnect with the new approach and adapt the follow-up and support to the new situation.

3. Further explore options to optimize and enhance the processes initiated at the regional level.

As the evaluation team has reiterated throughout this report, the regional level has proven to be more receptive and responsive towards the project's proposals. The institutions at this level have developed spaces to integrate and take forward the FL agenda. This is in clear contrast to the developments at the national level.

The evaluation team finds that this represents an opportunity to enhance the regional level (the bottom-up approach). The evaluation team recommends that the project explore the options to conduct further investment at this level, even at the expense of reallocating resources (potentially financial but also time and effort from the team) from the central/policy level, if the reassessment of options indicates a lessened prospect of success.

In particular, the evaluation team highly recommends that the project search pro-actively for self-replicating processes to disseminate knowledge and information about FL. The experiences of the Peace Court Judges in Cusco and the District Governments in Loreto represent good examples of the potential use of these networks to spread the message across and activate alert systems. There are 113 District Governments (Municipalities) in the Cusco Department that could be targeted by the project. If the top-down approach meant to activate alert systems does not yield clear results, the project could explore the options of the bottom-up approach.

4. Further explore options of complementarity and collaboration with the ILO-Bridge project.

The evaluation team gathered several ideas concerning possible ways of improving collaboration between the CHS indicators project and the ILO-Bridge project. Some of them refer to the possibility of joining efforts for communication purposes, some others to the development of common protocols for the partners' stakeholders. The evaluation team does not recommend one specific option; according to the information gathered and analyzed, the ILO bridge project includes a component (Nº2) that covers policies, planning and norms, and it is possible to anticipate that under this label there should be options to identify an interface between the two projects to advocate and develop FL labor indicators and other topics of common interest. Indeed, the MoL could play a key role in defining which this complementarity could be, but both projects could jointly take the initiative to prompt the Ministry in this regard.

5. Enhance regular contact with the Political Section of the U.S. Embassy to explore ways of collaboration that could benefit both parties achieving their respective objectives.

The evaluation team recognizes that there is ongoing policy dialogue between the U.S. Embassy and the Peruvian Government on different issues that could potentially incorporate inputs emerging from the CHS's FL indicators project. The evaluation team understands that CHS is already making contributions to this dialogue via USAID in the domain of Human Trafficking but there is room to replicate this exercise in relation to the Forced Labor work. Unlike USAID, USDOL does not have a physical office in the country, but it could play a liaising role in facilitating the contact between the Embassy and the project.

6. Improve the communication routines with USDOL and ensure the clarity, coherence and comprehensibility of the documentation submitted.

The project should improve the effectiveness and clarity of its communication and reporting methods and products, particularly with regards to the donor, USDOL. Some of the early documents compile a lot of information but are not necessarily structured in a clear and systematic manner. Another finding of the evaluation was that some regional processes, those of more intangible nature, were not well reflected in the reports. Likewise, it is equally important to document and accurately report the outcomes of the advocacy work since they usually demonstrate valuable achievements and open new lines of actions and opportunities worth of being jointly explore with USDOL. CHS should put special emphasis in improving these aspects since an improvement in the communication with USDOL will enable this organization to better understand the technical needs of the project and provide more accurate support and guidance.

6.2 Recommendations for USDOL:

7. Verify that the development of the CMEP by the contractor, grantee and/or the implementing partner does not compromise and/or cause any undesired delay the start of program implementation.

The CMEP has been highly valued by the team members and is recognized as a very useful instrument to get a better understanding of the project strategy and monitor the implementation. USDOL has issued guidelines, materials, and templates to its partners providing guidance and clarification for development of the CMEP, but the experience of this project shows that this guidance might need some sort of explicit enforcement. Without an enforcement mechanism for USDOL guidance, there could be delays in the implementation of the full program of activities. This can be avoided or minimized by placing more emphasis and attention in verifying during these early stages that the program's activities run in parallel with enacting the CMEP

8. Consider an extension of the project's period of performance with a non-cost extension.

All the data and information available to the evaluator suggests that time remaining will not be enough for the project to complete the program activities. The evaluation team cannot

assess at this stage what the outcome of the current political crisis will be; based on the current status, the team anticipates that some of the initiated processes will require extra time to complete. Unless there is a dramatic turn for the worse in the political circumstances, the evaluation team understands that this extension might be justified. The evaluation team suggests an estimated extension period between 6 and 12 months, but the final decision on its length will depend on the remaining budget and an analysis of the tasks and to be conducted jointly by CHS and ILAB.

9. Consider including more specific instructions and guidance on the corresponding FOAs requiring joint collaboration between USDOL-funded and complementary projects.

The evaluation team found that, without USDOL-initiation, collaboration among USDOL-funded projects is occasional and hindered by institutional inertias and styles. An explicit requirement in the text of the funding instrument prompting the partners (grantee, contractor, etc.) to undertake specific measures in this regard might ease the process of collaboration among projects.

ANNEX A: SUMMARY OF ACHIEVEMENTS AGAINST THE ELEMENTS OF THE RESULTS FRAMEWORK

| Indicator | Progress |
|--|--|
| Outcome 1. Improved understanding of forced labor and labor trafficking indicators among the National Commission for the Fight Against Forced Labor (NCFAFL). | |
| OTC1: Number (#) of NCFAFL member institutions that implement measures that apply the approved indicators. | <p>The project has been successful in including a reference to the application of FL indicators in the III National Plan.</p> <p>Based on the above, Annex A of the TPR October 2020 is counting the 19 members of the NCFAFL as institutions implementing measures that applied the approved indicators. 8 more members from the Cusco FL commission and 4 from the Iquitos FL commission are also counted. 31 members in total.</p> <p>Technically this calculation method does not match the technical definition included in the CMEP, that requires of “specific actions” being applied.</p> |
| Supporting Outcome 1.1. Increased governmental agreement on forced labor and labor trafficking indicators among the NCFAFL. | |
| SO 1.1 # of new political agreement adopted by the NCFAFL that implement indicators of Forced Labor. | <p>Annex A is reporting the approval of the III National Plan plus an agreement with the MoL, the agreement with the Public Prosecutor and two requests of Technical Assistance from the MINJUSDH and the Regional Government of Cusco.</p> <p>Again, there is a mismatch with the wording of the indicator. Technically the agreements should be adopted by the NCFAFL, but as explained in the body of the report, this structure is not performing as expected and the project has shifted the focus to the bilateral and regional levels.</p> <p>Counting the request of Technical Assistance as a “political agreement” can be also questioned.</p> |
| Output 1.1.1. Agreement approved by the NCFAFL for the implementation of consensus building process of FL indicators | |
| OTP 1.1.1 (Milestone 1): NCFAFL member institutions agree to draft the indicators of Forced Labor | <p>Agreement pending</p> <p>MoL has conditioned its agreement to the completion of the survey of FL prevalence being conducted by ILO in collaboration with INEI.</p> <p>Member institutions ambiguous about their interest in the proposal of indicators</p> |
| OTP 1.1.1 (Milestone 2): Proposal of the indicators of Forced Labor is validated by a majority of members | <p>Proposal not completed yet. Experts commission has been appointed. 4 preliminary studies have been completed. Proposal expected 1st quarter 2021</p> |

| Indicator | Progress |
|---|---|
| OTP 1.1.1 (Milestone 3): The NCFAFL approves the proposal of Forced Labor indicators | Proposal not completed yet. It will probably have to be approved and adopted independently by every institution or at Regional Level |
| Supporting Outcome 1.2. Increased technical capacity of the NCFAFL to develop FL indicators. | |
| SO 1.2: # of technical proposals of FL indicators validated by experts. | The four preparatory studies have been completed (4). Annex A is also referring to the set-up of the regional sub-commissions (2) and other proposals being analyzed and discussed with the MINJUSH, the Public Prosecutor and the National Police. These proposals are mainly meant to improve the registration systems of these institutions. |
| Output 1.2.1 Technical proposal of forced labor & labor trafficking indicators submitted to the NCFAFL | |
| OTP 1.2.1 (Milestone 1): Establishment of a team of specialists for the development of the technical proposals of FL indicators | Team has been appointed. |
| OTP 1.2.1 (Milestone 2): Development of the technical proposals for FL indicators | Proposal expected during the first quarter of 2021 |
| OTP 1.2.1 (Milestone 3): Submission of the technical proposal to the NCFAFL | Technical proposal still to be completed |
| Output 1.2.2. Members of the NCFAFL trained on FL indicators | |
| OTP 1.2.2: % of individual NCFAFL members who have participated in the training and score at least 70% in the Forced Labor Indicators Exam. | Curricula available. Training not conducted yet. |
| Outcome 2. Improved monitoring of working conditions linked to FL indicators by the National Commission for the Fight Against Forced Labor (NCFAFL). | |
| OTC 2: Number (#) of NCFAFL member institutions that implement coordinated inter-sectoral measures to monitor working conditions (WC) linked to FL and LT | Annex A reports that 5 institutions are already implementing measures. MoL, MINJUSDH, Public Prosecutor and the two Regional Governments (GOREC & GOREL). Four more institution are considering the implementation of these measures: National Congress, SUNAFIL, Public Defendant and PNP It has not been possible for the evaluation team to establish the extent of that implementation. There are signs that this is mostly the case at the regional level |
| Supporting Outcome 2.1. Forced Labor Indicators Monitoring System institutionalized among labor stakeholders of the NCFAFL | |
| SO 2.1: # of internal measures taken by members institutions of the NCFAFL to adopt the FL | Annex A report the request of Technical Assistance submitted by the Public Prosecutor, the Public Defendant and the National Police. It is also reported the request to set-up a Regional Observatory on FL (Cusco) |

| Indicator | Progress |
|---|--|
| indicators monitoring system within their institution | <p>It has to be noted that the Technical Assistance provided by the project to these institutions, is not necessarily meant to set up the new FL monitoring system, but to improve the existing systems that these institutions are already running and to make them more sensitive to FL issues.</p> |
| Output 2.1.1. Agreements approved by the NCFAFL for the implementation of the monitoring system of forced labor indicators | |
| OTP 2.1.1 (Milestone 1): NCFAFL member institutions agree to coordinate amongst each other for the development of the FL monitoring system | <p>Coordination between NCFAFL institutions have been observed at regional level through the FL commissions</p> <p>Annex A reports the same requests of Technical Assistance and Bilateral agreements.</p> <p>The initiative to set up a National Observatory has been taken to the National Congress.</p> |
| OTP 2.1.1 (Milestone 2): Representatives of the NCFAFL agree to establish the FL Monitoring Working Group | No progress so far. There is no realistic expectation of the NCFAFL setting up a monitoring group in the short-term. This milestone could be achieved at the regional level |
| OTP 2.1.1 (Milestone 3): NCFAFL member institutions approve implementation of the monitoring system of FL indicators | No progress so far. There is no realistic expectation of the NCFAFL setting up a monitoring group in the short-term. This milestone could be achieved at the regional level |
| Output 2.1.2. Forced Labor monitoring system implemented | |
| OTP 2.1.2 (a): # of tools to monitor working conditions developed, tested and implemented | Delayed |
| OTP 2.1.2 (b): % of individual Monitoring Working Group members who have participated in the training and score at least 70% in the FL monitoring system Exam. | Delayed |
| Supporting Outcome 2.2. Increased availability of data on FL cases | |
| SO 2.2: # of official reports produced through the FL monitoring system | None. No realistic expectation of achieving this outcome at national level. |
| Output 2.2.1. Labor stakeholders trained on the implementation of the FL Monitoring System | |
| OTP 2.2.1: % of individual labor stakeholder trainees who have participated in the training and score at least 70% in the Implementation of the FL monitoring system exam | <p>Training activities have been conducted in different formats with focus on disseminating the 11 ILO indicators and their possible application in real circumstances.</p> <p>No training has been conducted so far in relation to the FL Monitoring System. The proposal for the system is still being developed</p> |

| Indicator | Progress |
|---|---|
| Output 2.2.2. Data on forced labor cases is available for use among relevant labor stakeholders | |
| OTP 2.2.2 (Milestone 1): NCFAFL member institutions agree to perform a pre-study of characteristics of their registration and reporting systems | A study has been conducted |
| OTP 2.2.2 (Milestone 2): NCFAFL member institutions agree to implement modifications in their registration and reporting systems | Annex A reports 3 national institutions, and 12 regional institutions (8 Cusco and 4 in Loreto). Regional institutions have shown a notable interest in developing their capabilities to identify and prosecute FL, but it has not been possible to verify if this includes modifications in their registration and reporting system |
| OTP 2.2.2 (Milestone 3): The NCFAFL approves the review of the availability of FL case data | No realistic expectation of achieving this outcome at national level. |
| Outcome 3. Strengthened capacity of labor stakeholders and civil society to address forced labor and labor trafficking cases | |
| OTC 3 (a): % of individual labor stakeholders trainees who have participated in the training and score at least 70% in the use of the Toolkit of referrals for FL victims | No training about the toolkit has been conducted as yet |
| OTC 3 (b): % individual of workers' organizations and CSOs trainees who have participated in the training and score at least 70% in the use of Alert and Reporting Platform | No training about the alert platform has been conducted as yet |
| Supporting Outcome 3.1. Relevant Protocols adapted to include the registry and referral of cases linked to FL indicators and FL monitoring systems | |
| SO 3.1: # of protocols adapted. | None |
| Output 3.1.1. Recommendations on relevant Protocols submitted to labor stakeholders | |
| OTP 3.1.1 (Milestone 1): Submission of the analysis of relevant protocols. | Report with conclusion and recommendations submitted (not verified) |
| OTP 3.1.1 (Milestone 2): NCFAFL agree with recommendations to be implemented on relevant protocols. | Report undergoing review by the secretariat of the NCFAFL |

| Indicator | Progress |
|--|--|
| OTP 3.1.1 (Milestone 3): The NCFAFL approves the new protocol for the registration and monitoring of information on FL. | To be approved |
| Output 3.1.2. Toolkit of referral victims to public and Social services implemented | |
| OTP 3.1.2 (Milestone 1): Submission of the Toolkit. | Toolkit still to be developed |
| OTP 3.1.2 (Milestone 2): Labor stakeholders validate the Toolkit. | Toolkit still to be developed |
| OTP 3.1.2 (Milestone 3): The NCFAFL approves and implements the Toolkit. | Toolkit still to be developed |
| Supporting Outcome 3.2. Workers organizations and CSOs utilizing Alert & Reporting Platform | |
| SO 3.2: # of cases reported through the Alert and Reporting Platform | Alert and Reporting Platform not in place as yet |
| Output 3.2.1. Alert & Reporting Platform implemented for workers organizations and CSOs | |
| OTP 3.2.1 (Milestone 1): Development of the Report and Alert Platform | Alert Platform not developed as yet |
| OTP 3.2.1 (Milestone 2): Testing and validation of the Alert and Report Platform | Alert Platform not developed as yet |
| OTP 3.2.1 (Milestone 3): Implementation of Report and Alert Platform | Alert Platform not developed as yet |
| Output 3.2.2. Advocacy campaign carried out within the general public on the importance of alerting and reporting about situations of FL, based on the monitoring of landmark cases of FL | |
| OTP 3.2.2 (Milestone 1): Comprehensive advocacy strategy developed | Strategy developed (verified) |
| OTP 3.2.2 (Milestone 2): Landmark FL and labor trafficking cases are documented | Cases are being documented (verified) |
| OTP 3.2.2 (Milestone 3): Comprehensive advocacy strategy implemented | Induction and awareness workshops organized for justice operators (verified) |

ANNEX B: LIST OF DOCUMENTS REVIEWED

Project Documents

1. Initial Project Document
 - Original Version
 - Revise Version (V3)
2. Technical Progress Reports (TPR)
 - October 2018
 - April 2019
 - October 2019
 - April 2020
 - October 2020
3. Comprehensive Monitoring and Evaluation Plan
4. Pre-situational analysis
5. Sustainability Strategy

Reference Documents

- Mapping study of government institutions that have services focused on the prevention, detection, care and reintegration of victims of forced labor, as well as social programs that serve the vulnerable population of the country.
- Study of barriers that prevent the adequate understanding and application of forced labor indicators including analysis of normative competencies, organizational structure, problems and barriers in the collaboration between stakeholders, and training needs of the actors.
- Inventory of government institutions that have information systems for recording cases or reports about forced labor or trafficking in persons for the purpose of labor or sexual exploitation, incorporating their respective variables and content.
- Proposals for the design a system that records the actions of the government concerning the reintegration of victims of forced labor, in order to monitor the situation of the victims until their final stage
- Advocacy Plan
- Regional Operational Plans
- Data collection instruments
- Tracking minutes

ANNEX C: MASTER INTERVIEW GUIDES

Annex C removed in this redacted version.

ANNEX D: TERMS OF REFERENCE

Annex D removed in this redacted version.