

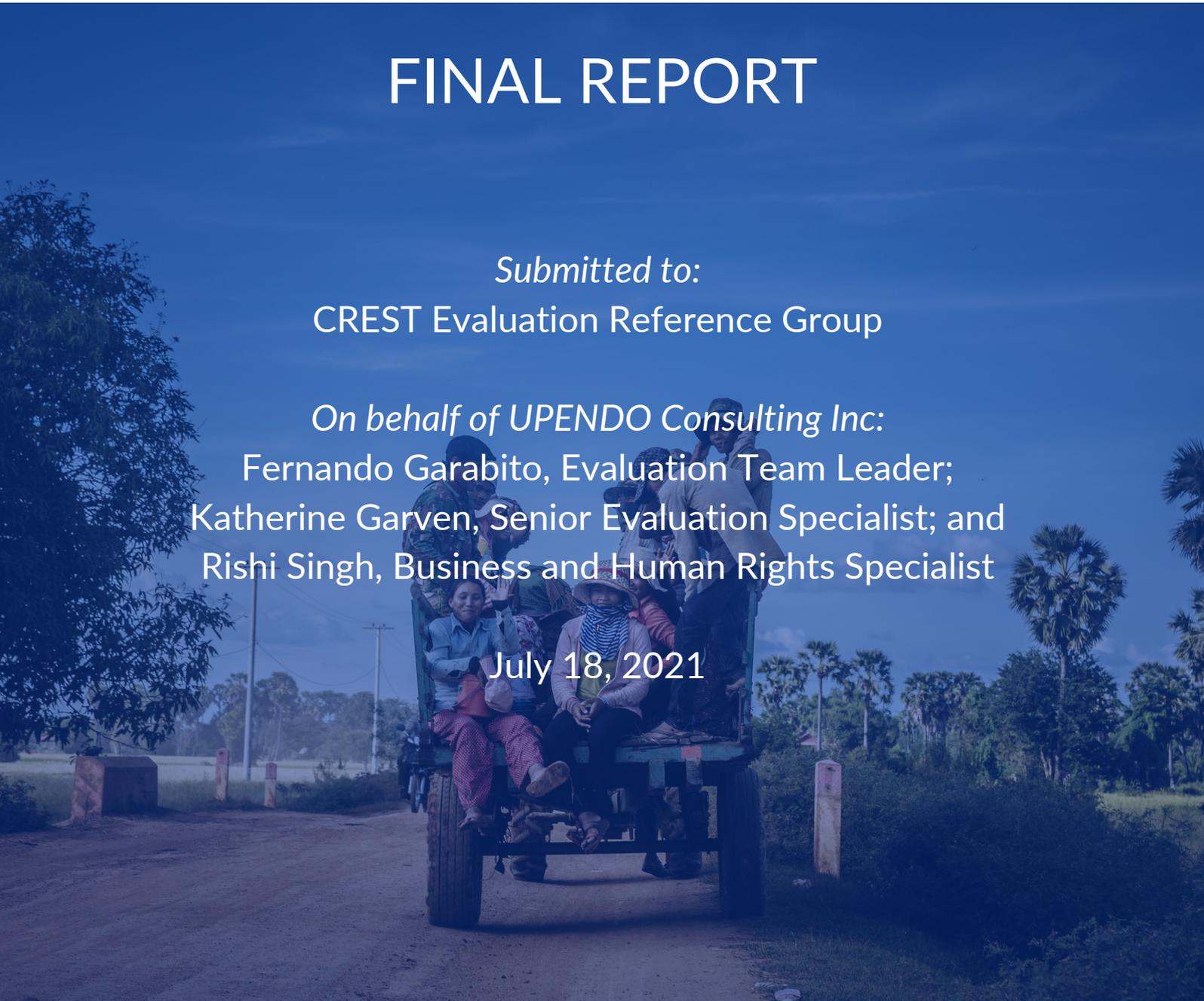
MIDTERM EVALUATION OF
THE CORPORATE RESPONSIBILITY IN
ELIMINATING SLAVERY AND TRAFFICKING
IN ASIA (CREST) PROJECT

FINAL REPORT

Submitted to:
CREST Evaluation Reference Group

On behalf of UPENDO Consulting Inc:
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July 18, 2021



AAFA	American Apparel & Footwear Association
CGF	Consumer Goods Forum
CREST	Corporate Responsibility in Eliminating Slavery and Trafficking in Asia
CSO	Civil Society Organisation
EF	Earthworm Foundation
ERG	Evaluation Reference Group
FLA	Fair Labour Association
Hong Kong SAR	Hong Kong, Special Administrative Region, China
HRBA	Human Rights Based Approach
HRDD	Human Rights Due Diligence
ILO	International Labour Organisation
IOM	International Organization for Migration
IRIS	International Recruitment Integrity System
KIIs	Key Informant Interviews
MFA	Migrant Forum in Asia
NAP	National Action Plan
NDA	Non-Disclosure Agreement
OECD/DAC	Organisation for Economic Co-operation and Development/Development Assistance Committee
PAB	Project Advisory Board
PAO	Post-Arrival Orientation
PDO	Pre-Departure Orientation
RBA	The Responsible Business Alliance
RBM	Results-Based Management
SAR	Special Administrative Region
SDGs	Sustainable Development Goals
SidaIDA	Swedish International Development Cooperation Agency
ToC	Theory of Change
ToRs	Terms of Reference
UFE	Utilization-Focused Evaluation
UN	United Nations
UNDP	United Nations Development Programme
UNGPs	UN Guiding Principles on Business & Human Rights

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The Evaluation Team (consisting of Fernando Garabito, Team Lead; Ms. Katherine Garven, Senior Evaluation Specialist; and Mr. Rishi Singh, Business and Human Rights Specialist) would like to thank members of the International Organization for Migration (IOM), the CREST Project Team, and the Evaluation Reference Group (ERG) for their support and participatory engagement in providing feedback on the evaluation design and methodology during the Evaluation Inception Phase and on the preliminary evaluation findings, conclusions, lessons learned and recommendations. Particular thanks are extended to the Evaluation Management Team (consisting of Maximilian Pottler, CREST Project Manager, Ida Steffensen, CREST Project Officer, IOM Viet Nam, and Hien Thi Minh Nguyen, CREST Project Assistant, IOM Viet Nam) for supplying key documents, organizing and facilitating meetings with the ERG, and providing overall support to the Evaluation Team. The team would also like to extend sincere thanks to all project stakeholders who participated in key informant interviews as part of the data collection process. The diversity of thoughts, opinions, and recommendations for improvement shared with the evaluation team has greatly contributed to the quality of this report.

BACKGROUND AND OVERVIEW OF THE CREST INITIATIVE

Private sector companies are increasingly working towards making their supply chains exploitation-free, in line with the UN Guiding Principles on Business & Human Rights (UNGPs). The International Organization for Migration (IOM) is currently implementing the Corporate Responsibility in Eliminating Slavery and Trafficking (CREST) initiative from 2017 - 2022, which is a regional partnership project with activities in Bangladesh; Hong Kong SAR, China; Malaysia; the Philippines; Thailand; and Viet Nam that aims to realize the potential of private businesses to uphold the human and labour rights of migrant workers in their operations and supply chains. Through the CREST Initiative, IOM develops partnerships and projects with private businesses to build stronger commitments to eliminate modern slavery, implement ethical recruitment standards that address migrant workers' vulnerabilities, and encourage collaboration across industries and stakeholders in order to achieve sustainable change. The project is funded by the Section for Regional Development Cooperation for Asia and the Pacific at the Embassy of Sweden in Thailand and through direct and in-kind contributions by private sector partners and institutions. Private sector contributions are expected to match the funding of SEK 52,086,020 by the end of 2020.

PURPOSE OF THE EVALUATION AND METHODOLOGY

IOM has commissioned a mid-term evaluation of the CREST initiative at the midpoint of its project implementation to assess the initiative's relevance, effectiveness, efficiency, coherence, potential impact, and sustainability, as well as its performance against the crosscutting criteria of gender, human rights and environment. The purpose of the evaluation is to provide an opportunity for organizational learning to improve future programming and to introduce corrective measures to strengthen the project's ability to deliver high-level results. The scope of the evaluation covered the project period from October 1st, 2017 – May 31st, 2020 across all six countries where the project is implemented, examining all partnerships and activities.

The evaluation drew on mixed quantitative and qualitative methods, as well as elements of a theory-based design, and was utilization-focused. It drew on participatory methods to engage members of the Evaluation Reference Group and key stakeholders throughout the evaluation process and integrated a gender equality and equity approach. The evaluation collected data through an extensive document review, virtual key informant interviews (KIIs) with key CREST stakeholders, and a portfolio review of CREST partnerships and initiatives. Due to the current COVID-19 pandemic, all data was collected remotely. The evaluation used a theory of change analysis, contribution analysis, cross-country comparison analysis, quantitative data analysis, coding and triangulation, gender equality and equity analysis and a human rights impact assessment approach analysis. The evaluation approach was grounded in the ethical principles defined in the UNEG Ethical Guidelines

SUMMARY OF MAIN FINDINGS

Relevance

The CREST initiative is filling an important gap to support private sector companies as duty bearers to uphold the UNGPs and promote the rights of migrant workers in accordance with the SDGs and international norms and priorities. Its unique model focused on working in partnership with and providing tailored support to private sector companies to identify and eliminate labour exploitation in their supply chains and promote the rights of migrant workers has created a much-needed "hook" to engage the private sector in further working towards the fulfillment of the UNGPs, and has contributed towards strengthening the placement of migration work within the core business and human rights agenda. This "hook" has the potential to facilitate further strategic engagement across industries. The project used a participatory inception phase to ensure its relevance, where it developed a multi-stakeholder Theory of Change (ToC) that informed the design of the project's logical framework. While the ToC is useful for understanding the complexities of eliminating the exploitation of migrant workers and the roles of different stakeholders in working towards this end, it is less clear as to how CREST's support to the private sector specifically links into the multi-stakeholder ToC. The COVID-19 pandemic has both increased the urgency as well as presented new opportunities to address the exploitation of migrant workers. CREST has been successful at quickly reacting to the crisis by gathering and sharing important information on the needs of migrant workers, identifying areas for action, and modifying its programming to adjust to the new context.

Coherence

The CREST initiative is generating important learnings that have contributed to the development of the new IOM Private Sector Partnership Strategy. It has also achieved some important synergies with other areas of IOM's work, particularly with respect to promoting IRIS: Ethical Recruitment. The initiative has successfully raised awareness within private sector circles of the support and expertise that IOM can provide to support the private sector in fulfilling the UNGPs. However, CREST's unique branding has also led to some confusion among some private sector companies who may not understand the relationship between CREST and the IOM, thus potentially reducing some of this visibility. The project has organized numerous dialogue sessions to date to bring external stakeholders and private sector partners together to facilitate networking and synergies. Even so, it currently has limited formal partnerships with other IOM initiatives and UN entities that can help to meet the needs of its private sector partners that fall outside of the project scope and to contribute towards the direct empowerment of migrant workers. While CREST has made some important contributions towards and has benefited from momentum within industries that already have established industry-wide private sector coalitions, some of its partners would like to see the IOM demonstrate more leadership in those industries that are less advanced.

Effectiveness

The CREST initiative is on track to fully achieving its *Outcome 1: Private sector stakeholders commit to the elimination of modern slavery in their operations and supply chains in Asia*. After successfully establishing 19 private sector partnerships, CREST is exceeding expectations with respect to engaging private sector companies and generating UNGP commitment. In fact, 92 percent of its private sector financial contributions goal has already been achieved only part way through the initiative. It has also established and strengthened important strategic partnerships with non-private sector actors. In addition, the initiative is on track to fully achieving its *Outcome 2: Private sector partners are taking measures to implement ethical recruitment for the elimination of modern slavery in their operations and supply chains in Asia*. CREST has provided much needed direct support to private sector companies to strengthen the implementation of the UNGPs through customized tools and support, such as its labour supply chain mappings. Its work has focused largely on supporting private sector companies to understand the importance of risk, mitigation, and remediation in order to better identify human rights abuses and outline the steps required to set up remediation mechanisms. The initiative has supported companies to develop human rights policies and due diligence processes. In some cases, CREST has also successfully supported companies to set up and begin implementing remediation processes. The project is also largely on track to achieving its *Outcome 3: Private sector stakeholders effectively collaborate with multi-stakeholder platforms to create an enabling environment for ethical recruitment*. This being said, its support to civil society organisations (including migrant worker associations and networks) has been limited. It has, however, secured a long-term strategic partnership with the Migrant Forum in Asia (MFA), which presents potential for future engagement with grassroots migrant worker organisations across the region. The project has also achieved a number of unexpected results that include uncovering risks of forced labour and human rights abuses that have, in some instances, resulted in remediation by the private sector company.

Efficiency

Significant investment in time and human resources has been required to set up most private sector partnerships. Engaging with companies that have strong senior management commitment towards the UNGPs tends to increase the likeliness of forming a strong partnership. The CREST initiative has established an innovative mixed funding model that facilitates the provision of customized support to private sector companies. While providing customized support may not be as efficient as providing standardized services, it has allowed CREST to effectively target the needs of each company and engage them in working towards the UNGPs. As part of the UN system, the IOM must follow a more administrative process than what private sector partners are used to. CREST has found it helpful to use a clear onboarding process to articulate what it means to be partnering with a UN agency in order to understand potential benefits as well as to set realistic expectations. The initiative has a well-functioning internal M&E system that uses a strong results framework and that collects data on a regular basis. It has also been successful at encouraging some of its private sector partners to directly report on results. Even so, the project has struggled at times to obtain results reporting from some of its private sector partners and, in some cases, has been unable to share information and report on results to the extent that would be typically expected from a UN project due to non-disclosure agreements (NDAs).

Potential Impact

CREST's direct approach has helped it to establish trust, develop a strong working relationship with private sector companies, and build a network of stakeholders to support its goals. Now that the project is well established, some of CREST's partners who participate in coalitions of private sector companies would like to see it take a more industry-wide approach that could further showcase and leverage the momentum of its work across companies. While the project will generally require some time for its outputs and outcomes to produce impact-level effects, it has already achieved some positive direct impact on the lives of migrant workers through company-led remediation efforts that have included returning passports to migrant workers and the repayment of recruitment fees and costs. Currently, CREST's results framework does not include useful indicators at the impact-level, as the current indicators are too high-level do not facilitate a sufficient causal linkage between the initiative's work and changes in the lives of migrant workers across the region.

Sustainability

CREST is using a systems building approach to support sustainability by building the capacities and integrating human rights due diligence and remediation processes into the business operations of its private sector partners to eliminate migrant worker exploitation across their supply chains. In some instances, CREST's support for the development of company policies to promote the UNGPs have led suppliers and other actors down the supply chain to also follow suit. CREST is also building on established partnerships through subsequent project phases in order to continue pursuing collaboration until the company fully meets the UNGPs. While the project's sustainability has been secured until September 2022, it is unclear whether and how it will be sustainable after this point, as it does not have a project sustainability strategy. The current mix of traditional donor and private sector funding has proven to be quite successful.

Gender, Environment and Human Rights

CREST has made some important investments towards thought-leadership with respect to the complex linkages between migration, business, and climate change to support the resilience of migrants' origin communities. However, it has yet to clearly define the scope and entry points of its own work in this area. The project is aligned with international human rights norms and standards. However, it does not have a formal mechanism in place to regularly engage stakeholders and receive their feedback on CREST project design modifications or implementation, which is a key element of a Human Rights Based Approach (HRBA). While the project is generally promoting the interconnectedness of the rights of migrant workers, this approach could be further strengthened since it has not always been possible to explicitly address the interconnectivity of migrant rights through each partnership, as CREST has had to focus pragmatically on strategic entry points within a sensitive human rights context. CREST's Gender Strategy has been useful to help it mainstream gender considerations throughout its work. However, there is still significant room for CREST to fully implement the strategy. Programming to date has not fully differentiated between sub-groups of vulnerable migrants and its programming has not specifically targeted women or different gender groups.

LESSONS LEARNED

- 1 Engaging with companies that have not yet formally endorsed UNGP principles can potentially have great impact on migrant workers. However, they can also create inefficiencies by often requiring lengthy partnership engagement processes. These inefficiencies can be mitigated by only engaging with partners who have demonstrated some degree of commitment towards the UNGP principles.
- 2 The CREST initiative's practical approach and direct engagement with private sector companies across migration corridors through customized tools and resources, labour supply chain mappings, and tailored trainings has helped to advance partnerships with private sector companies and other key stakeholders as well as the overall migration, business, and human rights agenda, and has generated important tangible learnings that have been shared across IOM.
- 3 NDAs can hinder transparency and accountability, limit information sharing that includes results, and reduce the ability to generate momentum across companies. However, these limitations can be reduced by negotiating certain terms such as the inclusion of basic elements of transparency.

- 4 Under the CREST model, private sector companies are partners who play a multi-faceted role as clients, strategic partners, and funders. The classic IOM partnership framework used to engage traditional donors is designed for funders that are not playing these dual roles, and therefore does not fully support the framework needed to forge partnerships.
- 5 A hybrid funding model can successfully leverage both traditional donor and private sector funding by allocating traditional donor funding exclusively towards those elements of the project that do not contribute to direct support to the private sector (and therefore not run the risk of potentially subsidizing the private sector), while ensuring that private sector funding covers all costs associated with the provision of partnership support.
- 6 It is crucial to engage private sector company industry-wide champions to fund strategic work around industry-wide collaboration, momentum building, knowledge exchange, etc. Those private sector companies that are not interested in funding strategic work that goes beyond activities that directly benefit them are interested in paying on a per deliverable basis and may be willing to pay for strategic work that is implicitly factored in as a type of overhead cost.
- 7 The most effective method of identifying potential new private sector partners has been through word of mouth and business referrals. The partnership development process can be shortened and made more efficient by being clear and direct with private companies from the start of any partnership discussions to understand the level of financial investment they are willing to provide towards the partnership as well to explain both the advantages and administrative requirements of working with a UN agency in order to set realistic expectations.

CONCLUSIONS

- 1 The CREST initiative has not yet fully defined its scope of work, including its cross-cutting work on gender, human rights, and the environment, which risks spreading the initiative too thin and may hinder its ability to achieve higher-impact results.
- 2 There are opportunities to further capitalize on CREST's privileged entry points with the private sector to advance UN programming and contribute towards its multi-stakeholder Theory of Change by further leveraging collaboration with other IOM initiatives and developing formal partnerships with other UN entities working on migration in the region.
- 3 CREST's early project success likely facilitates a subsequent project phase. However, the initiative has yet to develop a project sustainability strategy, which could benefit from donor diversification as well as increased private sector contributions towards CREST's more strategic work.
- 4 While all of CREST's products and services are designed to promote the rights of migrant workers and reflect a migrant-centered approach, the initiative has had limited programming targeted at directly empowering migrant workers, and does not have a formal mechanism set up where migrant workers or groups that represent them can influence decisions related to project design modifications and implementation. Further direct engagement and empowerment of migrant workers is necessary to be fully aligned with a HRBA and the UNGPs.
- 5 The CREST initiative does not have standard NDAs to draw on or minimum standards in place to guide the negotiation of NDAs. In several cases, the conditions of NDAs with private sector companies have not encouraged company reporting on results and have hindered CREST's ability to share information. To encourage results reporting, CREST will need to further negotiate NDAs that better facilitate the sharing of results.
- 6 Even though CREST has been highly successful at establishing partnerships with private sector companies, in many cases the partnership development process has been lengthy and resource heavy, which has affected the initiative's efficiency and may even put the sustainability of the CREST initiative at risk. CREST currently does not have clear guidance on how to efficiently engage in partnership development and does not have clear criteria to guide decisions around when the pursuit of a new partnership should be dropped due to the unlikelihood that the partnership will be fruitful and worth the investment.

RECOMMENDATIONS

- 1 Further define CREST's scope and project parameters to ensure quality programming and facilitate the achievement of impact-level results.
- 2 In the second half of the initiative, focus on strategic level work that includes linking private sector partners to other UN entities and strategic actors, fostering an industry-wide approach, continuing to develop strategic partnerships, and widely sharing knowledge and best practices.
- 3 Strengthen CREST's direct engagement with and empowerment of migrant workers through initiatives with partners as well as the engagement of migrant worker organisations in the project design and implementation.
- 4 Establish CREST-specific guidelines to facilitate more efficient and sustainable partnership development processes.
- 5 Develop a sustainable funding strategy to ensure the sustainability of the CREST Initiative once the project ends in September 2022.

1.1. MIGRANT WORKER EXPLOITATION

According to the International Labour Organisation (ILO), around 64 per cent of the international migrants around the world in 2017 were international migrant workers (164 million out of the 258 million, of which 58% were men and 42% were women).¹ Migrant workers are vulnerable to exploitation throughout their migration journey, which includes during pre-departure, throughout their work abroad, and upon return to their country of origin. Several factors converge to perpetuate these vulnerabilities that lead to continued exploitation. These include a lack of knowledge by migrant workers of their rights and of available services to help defend their rights; lack of knowledge among employers and recruiters of the rights of migrant workers; recruitment fees and related costs that must be paid by the migrants; lack of transparency regarding recruitment processes; weak or ineffective grievance mechanisms and limited access to remedy; discrimination against migrant workers; and weak legislative and governance systems to protect the rights of migrant workers.² Some of the dangers migrant workers often face include debt bondage, restricted movement, and retention of documents and personal property, among other forms of abuse.

1.2. BUSINESS AND HUMAN RIGHTS DUE DILIGENCE

Private sector companies are increasingly engaging in protecting the rights of migrant workers and are working towards making their supply chains exploitation-free. In 2011, the UN Guiding Principles on Business & Human Rights (UNGPs) were endorsed by the UN Human Rights Council, thereafter serving as a global standard for corporate responsibility. At its core is the concept of Human Rights Due Diligence (HRDD) as a means for businesses to 'know and show' their impacts in the value chain.³ We are now seeing these principles being embedded into government policy in an increasing number of countries through the use of National Action Plans⁴ and local guidelines, legislated in some instances and encouraged via investor action (e.g. the Corporate Human Rights Benchmark). The new legislations have resulted in increased HRDD, impacting local and global supply chains. While there is increased awareness in companies to promote Human Rights in their operations and supply chains by implementing HRDD,⁵ South East Asia is still tackling chronic issues such as lack of transparency, labour rights abuse, child labour, migrant exploitation, modern slavery, gender inequality, limited inclusion, climate change, poverty and corruption.

1.3. IOM AND PRIVATE SECTOR ENGAGEMENT

The International Organization for Migration (IOM) supports the engagement of private sector companies through its programming. The overarching goal of the IOM Private Sector Partnership Strategy (2016-2020)⁶ is to establish long-term partnerships with companies as well as foundations, associations and individuals that leverage each partner's knowledge, expertise, skills and/or resources in areas of common interest for the benefit of migrants and society.⁷ While IOM's engagement with the private sector has historically been largely focused on leveraging donations and in-kind support for humanitarian initiatives, given the emerging environment of increased legislation and corporate accountability, the organisation has recently become involved in providing direct support to private sector companies to eliminate exploitation throughout their supply chains and to protect the human rights of migrant workers.

See Annex 9 for additional information on the background and context in which the CREST initiative operates.

¹ International Labour Organization, Labour Migration Branch Conditions of Work and Equality Department, Department of Statistics, ILO Global Estimates on International Migrant Workers. Results and Methodology, Executive Summary. (2nd Edition. Reference Year: 2017). www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_652029.pdf [Accessed on July 15 2020].

² CREST Theory of Change Document, Working Together to End Migrant Worker Exploitation in Business Operations and Supply Chains, International Organization for Migration.

³ Business and Human Rights Resource Centre 2020.

⁴ The Danish Institute for Human Rights 2020.

⁵ Popper 2019.

⁶ IOM Private Sector Partnership Strategy 2016-2020, (September 18 2015).

⁷ A new IOM PSP strategy was developed in 2020.

2.1. PROJECT OVERVIEW

The IOM is currently implementing the Corporate Responsibility in Eliminating Slavery and Trafficking (CREST) initiative, which is a regional partnership project that aims to realize the potential of private businesses to uphold the human and labour rights of migrant workers in their operations and supply chains to achieve the United Nations Sustainable Development Goals (particularly targets 8.7 and 10.7), and the Global Compact for Migration.⁸ Through the CREST Initiative, IOM develops partnerships and projects with private businesses to build stronger commitments to eliminate modern slavery, implement ethical recruitment standards that address migrant workers' vulnerabilities, and encourage collaboration across industries and stakeholders in order to achieve sustainable change. Private sector partners include large multinational entities that span across the apparel and footwear, agriculture, home furniture and textile, electronics, and retailing sectors throughout the Asia-Pacific region and beyond.

Project activities are designed to increase migrant workers' access to transparent information on employment terms and conditions, ethical recruitment services, and enhanced worker voice and effective grievance mechanisms. With financial support from the Section for Regional Development Cooperation for Asia and the Pacific at the Embassy of Sweden in Thailand, the initiative spans 2017 – 2022 and includes activities that are implemented in Bangladesh; Hong Kong SAR, China; Malaysia; the Philippines; Thailand; and Viet Nam. Direct and in-kind contributions by private sector partners are expected to match the funding of SEK 52,086,020 by the end of 2022.

2.2. PROJECT LOGIC

The overall project goal/objective of the CREST Initiative is to ensure that **businesses respect, promote and remedy the human and labour rights of women and men migrant workers in Asia, in key industries and supply chains**. The project logic is outlined in CREST's Project Document and its corresponding logical framework. Corresponding outputs, targets, and indicators are presented in the logical framework, located in Annex 11.

The key outcomes of the CREST Initiative are the following:

- | | |
|----------------------------------|--|
| Outcome 1: Commitment | Further define CREST's scope and project parameters to ensure quality programming and facilitate the achievement of impact-level results. |
| Outcome 2: Implementation | In the second half of the initiative, focus on strategic level work that includes linking private sector partners to other UN entities and strategic actors, fostering an industry-wide approach, continuing to develop strategic partnerships, and widely sharing knowledge and best practices. |
| Outcome 3: Collaboration | Strengthen CREST's direct engagement with and empowerment of migrant workers through initiatives with partners as well as the engagement of migrant worker organisations in the project design and implementation. |

⁸ The Global Compact for Migration is an intergovernmental agreement, prepared under the auspices of the United Nations to cover all dimensions of international migration in a holistic and comprehensive manner: GLOBAL COMPACT FOR SAFE, ORDERLY AND REGULAR MIGRATION, (signed by the Heads of State and Government and High Representatives, meeting in Morocco on 10 and 11 December 2018). McAdam, J. (2019). Global Compact for Safe, Orderly and Regular Migration. *International Legal Materials*, 58(1), 160-194. doi:10.1017/ilm.2019.6.

During its inception phase, CREST developed a Multi-Stakeholder Theory of Change (ToC) with input from the private sector, expert organizations, civil society, as well as representatives from international organizations. The ToC, located in Annex 4, was designed to outline how different actors—corporations, NGOs, governments, recruitment agents, employers—can use their role and available levers to help ensure migrant workers have access to and can enjoy decent work through ethical recruitment channels. According to the CREST Initiative’s multi-stakeholder Theory of Change (ToC), the key outcome areas that the CREST Initiative is designed to contribute towards are the following:

- 1 **Knowledge:** Stakeholders have complete, accurate and consistent information about the recruitment process;
- 2 **Recruitment Fees:** Workers are recruited through ethical recruitment channels, do not pay illegal fees, and have transparent information on any costs they do pay;
- 3 **Culture:** Workers are treated with respect in the home and host country both at work and outside work;
- 4 **Governance:** Destination and source governments create a framework that protects migrant workers;
- 5 **Effective Remedy:** All stakeholders understand what an effective grievance mechanism is and workers have access to effective remedy;
- 6 **Transparency:** Workers are recruited through transparent recruitment processes.

2.3. PROJECT STAKEHOLDERS

The CREST Initiative engages a number of stakeholder groups and is accountable to both rights holders and duty-bearers. Rights holders include women and men migrant workers in South East Asia, while duty-bearers include governments, private companies, donors, and the IOM and other United Nations entities. Stakeholder groups involved in the project have diverging views, needs and expectations, which create a complex landscape for the CREST initiative to navigate. A full stakeholder map developed by the Evaluation Team is located in Annex 3.

The main stakeholders of the CREST initiative are:⁹

- **CREST Team and IOM Staff (including the CREST Project Advisory Board);**
- **Partnering private sector companies/employers;**
- **Partnering Private Sector business associations and groups;**
- **Private sector foundation donors;**
- **Women and men migrant workers;**
- **Labour recruiters;**
- **CSOs working with CREST (including migrant workers organisations);**
- **Section for Regional Development Cooperation for Asia and the Pacific at the Embassy of Sweden in Thailand (Donor);**
- **UN entities that have worked with CREST (i.e. ILO, UN Women);**
- **Actors working on ethical recruitment and migration within the region who have worked with CREST; (including academia, CSOs, inter-governmental organisations, etc).**

⁹ The report references at times “CREST’s institutional partners,” which are categorized as those partners who are not private sector companies but who have a direct partnership with the CREST initiative. They can include other UN agencies, CSOs, industry-wide coalitions, etc.

3.1. EVALUATION PURPOSE AND OBJECTIVES

IOM has commissioned a mid-term evaluation of the CREST Initiative at the midpoint of its project implementation to assess the initiative's relevance, effectiveness, efficiency, coherence, potential impact, and sustainability. The **purpose** of the evaluation is to provide an opportunity for organizational learning to improve future programming and to introduce corrective measures to strengthen its ability to deliver high-level results. In addition, since the CREST Initiative constitutes an innovative initiative within IOM's private sector partnership strategy,¹⁰ the evaluation will also be institutionally relevant to assess the relevance and the accountability of the initiative.

The overall **objectives** of the evaluation are to 1) take stock of project results achieved thus far and progress towards the achievement of the project outcomes and objective; and 2) identify lessons learned and strategic recommendations to inform the remainder of the project, including recommendations for project strategies revision and the development of a project sustainability strategy.

3.2. EVALUATION USERS

The **primary users** and target audience for this evaluation include the Development Section of the Swedish Embassy in Thailand, IOM CREST missions, relevant IOM HQ departments such as Donor Relations and Resource Mobilisation (DRD), Project Advisory Board (PAB)¹¹ members, and project partners.

Secondary users include potential new partners and co-funders; national and regional stakeholders (including government bodies and CSOs); other UN agencies and organisations working in the area of migrant workers and human rights; and any other initiative seeking to advance and uphold the rights and wellbeing of migrant workers.

3.3. EVALUATION SCOPE

The scope of the evaluation covered the project period from October 1st, 2017 – May 31st, 2020 across all six countries where the project is implemented, i.e. Bangladesh; Hong-Kong SAR, China; Malaysia; The Philippines; Thailand; and Viet Nam. The evaluation also took into consideration results that were achieved from June 1st 2020 – September 30th, 2020 due to the fact that CREST's reporting year ends at the end of September and it is very challenging to distinguish results that were achieved prior to May 31st, 2020 from those achieved up until the end of September 30th, 2020. The evaluation covered all partnerships and activities conducted by the project during the period under review.

3.4. EVALUATION CRITERIA AND GUIDING QUESTIONS

The evaluation was structured around the standard OECD/DAC evaluation criteria of relevance; coherence; effectiveness, efficiency, sustainability, and potential impact.¹² In addition, the evaluation included three cross-cutting criteria, i.e. gender, human rights and environment. Key evaluation questions and sub-questions used to guide the evaluation are presented in Annex 2 as part of a full evaluation matrix that outlines how data methods and sources were used to answer each question through the use of assessment indicators.¹³

¹⁰ IOM Private Sector Partnership Strategy 2016-2020, (September 18 2015).

¹¹ The PAB include: 1. Chiefs of Missions from IOM Bangladesh, the Philippines, Malaysia, Thailand, China and Viet Nam; 2. Senior Regional Thematic Specialists from Labour Mobility Human Development (LHD) and Migrant Protection and Assistance Division (MPA), the Regional Office for Asia and the Pacific; 3. Senior Representatives from LHD and MPA in IOM Headquarters; and 4. CREST Regional Project Manager

¹² Since the CREST Project is only in its 3rd year of implementation with two more years ahead, this evaluation can only seek to assess the potential impact the Initiative appears to be having at this stage.

¹³ The Key Evaluation Questions originate from those outlined in the Evaluation ToRs. During the Inception Phase, the Evaluators made slight modifications to their wording; re-categorized them according to the OECD/DAC evaluation criteria; and added some new questions in order to provide a full assessment of the project.

The following section presents a summary of the evaluation methodology. For a more detailed description of the methodology, please see Annex 10.

4.1. EVALUATION DESIGN AND APPROACH

To meet the specific evaluation objectives identified in the evaluation terms of reference (ToRs), this Midterm Evaluation drew on **mixed quantitative and qualitative methods**. It also drew on elements of a **theory-based design** by providing a detailed assessment of the project's Theory of Change (ToC) and Logical Framework, and by testing their hypotheses and assumptions throughout the evaluation process. Since the evaluation will be used by the Development Section of the Swedish Embassy in Thailand, the IOM, and their partners as a forward-looking tool to inform the continuation of the CREST Initiative as well as future programming and initiatives in this thematic area, the evaluation was **utilization-focused** to ensure that the evaluation findings, conclusions, recommendations and lessons learned are as useful as possible to the evaluation users. The evaluation drew on **participatory methods** to engage members of the Evaluation Reference Group and key stakeholders throughout the evaluation process. These include engaging the Evaluation Reference Group through an inception presentation to discuss and provide feedback on the evaluation methodology and timeline, as well as through a presentation to collaboratively discuss the evaluation findings and define the recommendations. The evaluation also used a **gender equality and equity approach** throughout the evaluation process. This was done by applying a gender and equity-sensitive analytical lens throughout the evaluation process to ensure that the evaluation process itself did not reinforce structures of inequality between different gender groups and sub-groups of vulnerable migrant workers.

4.2. DATA COLLECTION METHODS AND SOURCES

The evaluation collected data through an extensive document review, virtual key informant interviews (KIIs) with key CREST stakeholders, and a portfolio review of CREST partnerships and initiatives. KIIs were used as opposed to Focus Group Discussions (FGDs) in order to respect non-disclosure agreements with certain partners and to better protect the privacy of all stakeholders. Activities and initiatives were compared across countries and partnerships through the Portfolio Review in order to further investigate project implementation modalities, results, and sustainability. The portfolio review also facilitated identifying strengths and areas for improvements across the initiative as well as any elements that might be missing from its programming. Due to the current COVID-19 pandemic, all data was collected remotely.

4.3. SAMPLING

The **document review** examined all key documents while the **Portfolio Review** included all 21 projects and all of the partnerships as well as all major CREST activities conducted between October 2017 and May 2020. A total of 33 one-hour virtual **key informant interviews (KIIs)** were conducted with 38 key stakeholders (22 women and 16 men). Stakeholders represented all of the key informant stakeholder groups with the exception of recruiters.

4.4. DATA ANALYSIS METHODS

The evaluation drew on the following data analysis methods to achieve the evaluation objectives: theory of change analysis, contribution analysis, cross-country comparison analysis, quantitative data analysis, coding and triangulation, gender equality and equity analysis and a human rights impact assessment approach analysis. Using UNGPs as a lighthouse, the evaluation used the following approaches for data collection and analysis of findings: country human rights risk map; human rights lens for gender; prioritization of human rights channels; cause, contribute and linked framework; promoting dialogue and solutions orientation. More information on these analysis techniques is located in Annex 10.

4.5. ETHICS

The evaluation approach was grounded in the ethical principles defined in the UNEG Ethical Guidelines that fall under three broad categories: obligations of evaluators, obligations to participants, and the evaluation process and product.

4.6 EVALUATION LIMITATIONS AND MITIGATION STRATEGIES

Limitations and Mitigation Strategies include:

- ❖ **Challenges around measurement:** The quality and availability of project baseline data influenced the extent to which the Evaluation Team was able to measure results progress. Even though the CREST project had limited baseline data, the evaluation design and methodology did not overly rely on the availability of such data.
- ❖ **Non-disclosure agreements:** Due to the requirement for IOM CREST to sign non-disclosure agreements with most of its private sector partners, the evaluation report is unable to name all of the private sector companies that have partnered with CREST, making it more challenging to directly associate results to partners. The Evaluation Team attempted to mitigate this reporting challenge by referencing the type of company as opposed to the company by name when reporting on results.
- ❖ **Direct interviews with migrant workers:** It was decided that the evaluation would not directly consult migrant workers in order to ensure their protection and due to challenges around gaining direct access to migrant workers through private sector companies and their suppliers. The Evaluation Team mitigated this challenge by interviewing civil society organisations (CSOs) who are in contact with migrant workers and/or who represent the voices of migrant workers.
- ❖ **Contribution towards results:** While contribution analysis is a useful tool to assess the extent to which the project is likely contributing to outcome and impact-level results, it takes time for project activities to have an effect at the impact level. Therefore, the evaluation was not able to directly assess impact level results but rather the likeliness that the project would have an effect on impact due to its structure, approach, and strategic focus.

5.1. RELEVANCE

This section provides an assessment of the extent to which the CREST initiative's design and objectives respond to the needs of migrant workers and private sector businesses under changing circumstances.

1. The CREST initiative is filling an important gap to support private sector companies as duty bearers to uphold the UNGPs and promote the rights of migrant workers. Its unique model of working with private sector companies has created a much-needed “hook” to engage the private sector that has the potential to facilitate further strategic engagement across industries. (Responds to EQs 1, 2 and 6)

Private sector companies, including multinational enterprises, are ultimately responsible for ensuring that their supply chains are free from exploitation, including the exploitation of migrant workers. They can ensure that all actors throughout their supply chain, including sub-contractors, use ethical principles in line with the UNGPs, and can leverage their market size and influence to promote respect for human rights in accordance with international standards. For instance, private sector companies can insist that migrant workers be recruited through ethical processes and can provide remediation when this is not the case. They can also work with governments to support national regulatory frameworks so that they are aligned with international standards and the UNGPs. It is therefore essential that private sector companies are committed to eliminating exploitation and are knowledgeable and capable to do so. Due to the challenges arising from migrant worker mobility and cross-border exploitation, many private sector companies require support to understand where exploitation is occurring in their supply chains and how to develop policies and remediation mechanisms to eliminate labour exploitation.

The CREST initiative is relevant in helping private sector companies address human rights risks and ensure that their supply chains are free from exploitation of migrant workers, in accordance with the SDGs and international priorities. The CREST initiative's framework is built on helping companies to understand where exploitation is most likely to occur within the supply chain through CREST's labour supply chain mapping exercises; supporting companies to develop policies and providing training to better align their business practices with the UNGPs; developing tools and guidance documents to help private sector companies align their business practices to the UNGPs and eliminate the exploitation of migrant workers; and to support the establishment of remediation mechanisms for migrant workers when instances of exploitation have occurred. The CREST initiative's framework, as outlined in its Project Document, takes a migrant centered-approach to support private sector companies by engaging migrant workers during the development of tools and labour supply chain mapping exercises to capture their realities and priorities. The initiative also provides some direct support to migrant workers including pre-departure and post-arrival orientations. This engagement of migrant workers in the development of company tools and policies helps to ensure that the approaches taken by private sector companies to meet the UNGPs are relevant to migrant workers and reflect their needs and priorities. The project has taken a unique approach that is different from the approaches of other UN agencies working in this area. As opposed to most other UN initiatives in the region that view the private sector as simply one of many actors that can influence the protection of migrant workers, the CREST framework puts the private sector first and foremost as a primary duty bearer and provides significant support to strengthen the capacity of the duty bearer in promoting human rights principles.

An in-depth review of documentation and discussions with CREST's partners (including private sector companies) has revealed areas where the CREST initiative, as part of the IOM, has a comparative advantage over other actors in supporting private sector companies. As part of the IOM, CREST is perceived by private sector companies as a *credible entity* to provide support with extensive knowledge and technical expertise in the realm of migration. Its extensive *regional architecture* is a major attraction for multinational companies whose supply chain spans across countries and whose migrant workers require support across origin and destination countries. The IOM CREST team is able to provide *localized migration expertise* across countries and provides companies with a strong understanding of and connection to the local context, including by having staff that speaks the local language and by drawing on IOM's extensive *network of migration stakeholders* (including CSOs and government actors) within each country. IOM's *not-for-profit status* is also seen as one of its strengths, as partners perceive CREST to have the interests of migrant workers at heart, which is viewed as a positive contribution within the private sector. Finally, the *flexibility and customized* support provided by the CREST initiative to companies through one-on-one partnerships is considered by private sector partners to be one of the greatest strengths of the initiative and has allowed it to respond to the specific and different

needs of each company. For example, CREST's labour supply chain mappings are designed to assess and address the specific challenges and risks of each unique company.

Due to the CREST initiative's comparative advantage and its customized and flexible approach, the project has been able to generate significant interest from the private sector to work on strengthening business and human rights principles throughout their supply chains. Engaging the private sector in human rights work as a duty bearer is a recurrent challenge for UN entities and has become an increasing priority for the UN. The CREST initiative's positive relationships with private sector companies are serving as an important "hook" to engage private sector companies to drive the implementation of the UNGPs and engage them in UN efforts to address the exploitation of migrant workers within supply chains. This hook has allowed the CREST initiative to push companies towards meaningful behaviour change when they likely would not have engaged on their own, as further outlined later in the report under project effectiveness. The project has also helped companies to realize that more systemic issues require collective approaches and multi-stakeholder dialogue. In fact, the CREST initiative has been actively involved in supporting the engagement of its company partners in industry-wide coalitions such as the Leadership Group for Responsible Recruitment, the Responsible Business Alliance (RBA), and the Fair Labour Association (FLA). It has also partnered with CSOs such as the Migrant Forum in Asia (MFA) and industry-wide coalitions such as those mentioned above to promote the engagement of migrant workers and synergies across companies and sectors. At only its midpoint, the CREST initiative has already successfully established 19 private sector partnership projects. With this hook now successfully established, the initiative is well placed to harness the potential of its comparative advantage and further support strategic industry wide synergies across the private sector.

2. The CREST initiative used a participatory inception phase to ensure its relevance, where it developed a multi-stakeholder Theory of Change (ToC). While the ToC is useful for understanding the complexities of eliminating the exploitation of migrant workers and the roles of different stakeholders in working towards this end, it is less clear as to how CREST's support to the private sector specifically links into the multi-stakeholder ToC in a concrete and actionable way. (Responds to EQ 5)

The CREST initiative made good use of a project inception phase that spanned its first year of operations. During this time, it pursued opportunities to engage stakeholders in the testing of tools and approaches that helped to inform the project design, and forged a wide network of partnerships with private sector companies and partner institutions. For instance, CREST reached over 2,763 participants from various stakeholder groups through workshops and training sessions as well as hosting/co-hosting five multi-stakeholder events aimed to enhance understanding on the vulnerabilities of migrant workers to modern slavery and good practices of companies to address associated risks in their operations and supply chains.¹⁴ It also developed strategic institutional partnerships with groups like the Responsible Business Alliance (RBA), the Migrant Forum in Asia (MFA), and the Laudes Foundation¹⁵, amongst others.

Since CREST was designed to complement existing initiatives of other actors in the region working on business and human rights as well as labour migration, the inception phase allowed for the initiative to adapt its approach based on key learnings. In fact, after the inception phase, a number of adjustments were made to the initiative to strengthen its relevance and strategic coherence. For instance, the project's logical framework was revised to align with various strategies developed during the inception phase;¹⁶ IOM partnered with the International Women's Rights Action Watch for Asia-Pacific (IWRAW-AP) to develop the CREST gender strategy; CREST developed an outreach strategy to ensure that the project promotes strategic engagement supported by private sector commitment (including financial and other resources such as the co-development of tools throughout project implementation); and tools to conduct labour supply chain mapping were developed and tested.

¹⁴ CREST 2018 Annual Report.

¹⁵ Previously called the C&A Foundation.

¹⁶ This included the development of the multi-stakeholder Theory of Change.

During this time, CREST developed a multi-stakeholder Theory of Change (ToC) to provide thought leadership for achieving ethical recruitment and minimizing migrant workers' vulnerability to modern slavery through collaborative approaches. The ToC (presented in Annex 4) centres around the following six outcome areas identified as critical to drive change: knowledge, recruitment fees, culture, migration governance, effective remedy, and transparency. The ToC identifies the status quo for each outcome area, alongside barriers, enablers, and key target outputs to be driven by relevant stakeholders. While the ToC is indeed an important knowledge contribution towards the complexities of eliminating migrant worker exploitation and outlines how stakeholders need to work together to address the complex inter-linkages between outcomes, it does not provide a clearly articulated path as to how the initiative's targeted engagement with private sector companies will feed into or contribute towards the larger multi-stakeholder ToC.

The project logic is outlined in its Project Document and Logical Framework, where outputs and outcomes are clearly presented and causal pathways between results are articulated. While these documents help to guide the initiative's project logic and strategic direction, it is missing a dedicated project-specific ToC to guide its work. Even though a project-specific ToC is not currently a requirement for IOM projects,¹⁷ the development and use of ToCs are widely considered good practice across UN programming because of the additional clarity and strategic focus that they can bring to project planning by succinctly articulating, both visually and through a narrative, the step-by-step change pathway from project activities through to long-term impact. Interviewed stakeholders largely view CREST's contributions towards the protection of migrant workers as valuable due to its targeted support for private sector companies, which is a niche area that adds value to the overall migrant worker protection programming done by UN agencies and other IOM initiatives in the region. The project has, however, yet to clearly articulate how this niche work fits into the larger multi-stakeholder environment through explicitly linked project-specific and larger multi-stakeholder ToCs.

3. The COVID-19 pandemic has both increased the urgency as well as presented new opportunities to address the exploitation of migrant workers. The CREST initiative has been successful at quickly reacting to the crisis by gathering and sharing important information on the needs of migrant workers and identifying areas for action. (Responds to EQs 3 and 4)

The COVID-19 pandemic has amplified challenges that migrant workers were already facing prior to the outbreak. For instance, due to the increased economic uncertainties caused by company shutdowns, there is a greater risk of increased recruitment fees for migrant workers since competition for employment has increased as well as increased travel costs that are often passed on to migrant workers through recruiters. In addition, as companies have laid off staff, many migrant workers have found themselves without employment, while some have been sent home without receiving their full pay or benefits. At the same time, the global pandemic has increased visibility with respect to the vulnerabilities of migrant workers. For instance, the spread of COVID-19 within migrant worker housing has raised awareness with respect to the deplorable living conditions of many migrant workers. The impact of COVID-19 has created more social awareness of how all people, even the most vulnerable, must be protected if we are to protect everyone.

Women migrant workers and COVID-19:

Women migrant workers (WMWs) are over-represented in the domestic and care sectors. As a result of COVID-19, there have been many reports of WMWs in the domestic sector having to work extended hours with families in quarantine, working without a day off or breaks, being unable to send remittances home due to lockdowns, cases of domestic workers being asked to leave the household with nowhere to stay, suffering from cases of abuse within the household, etc. In addition, many WMWs working in the care sector have had to work without proper personal protective equipment, putting them at greatest risk of contracting COVID-19 and of facing increased stigma around being potential virus carriers.

¹⁷ TOC development has become more integral to IOM project development since the CREST Initiative's inception phase in 2017.

Within this context, the CREST initiative rapidly responded to the increased urgency and new opportunities to address migrant worker vulnerabilities in a number of ways. This included conducting and supporting surveys among migrant workers to better understand the reality on the ground and to raise awareness among CREST partners, including private sector companies, as to the new and emerging challenges facing migrant workers within the context of the pandemic. It also included sharing guidelines with private sector partners on how to respond to these new challenges. The CREST initiative also developed a number of materials to support private sector partners during the early days of the pandemic to understand rapidly changing realities and to provide support to guide the responses of private sector companies. These materials were also used by CREST's institutional partners (such as the Consumer Good Forum and the IHRB) and shared widely among their own network of partners. Materials developed and translated into local languages by IOM and CREST in countries such as Malaysia and Thailand were also shared with CSOs and government

Moving materials online:

When other projects were delaying in-person meetings and activities because of COVID-19, CREST went ahead and tried to put as many activities and materials as possible online (remote activities and the production of video materials) so as not to waste any time.

contacts. Although a number of factors made the project's response to Covid-19 more challenging such as lockdowns, few direct channels with governments, and the fact that other IOM programmes were mandated to specifically respond to Covid-19, CREST's partners have highlighted the usefulness of its support, especially during the early days of the global pandemic specifically with respect to the provision of briefings and information-sharing when information on the effects of the pandemic on migrant workers was limited.

5.2. COHERENCE

This section provides an assessment of the extent to which the CREST initiative is aligned with and complementary to the initiatives of the IOM and other actors working on safe migration and ethical recruitment within Asia.

4. The CREST initiative is valued by the IOM and other relevant regional actors, and is providing important learnings with respect to engaging the private sector and addressing migrant worker vulnerabilities within private sector supply chains in concrete and actionable ways. (Responds to EQ 7)

The CREST initiative is aligned with IOM's mandate and is contributing towards ending the exploitation of migrant workers. By focusing primarily on the exploitation of migrant workers within private sector supply chains by engaging directly with private sector companies, the initiative is also providing significant added value to the organisation since direct engagement with private sector companies through mutually beneficial partnerships is a relatively new approach. Its testing and exploration of this new approach has provided IOM with considerable learnings with respect to engagement with private sector companies and migrant worker exploitation within the supply chain.

Many of these learnings have been pivotal in the development of the new global IOM Private Sector Partnership Strategy that was being created in 2020. For instance, CREST learnings have informed elements of private sector partnership outreach, co-development of tools with the private sector, and how to improve IOM's responsiveness and timeliness when working with private sector companies, among others. These learnings have been particularly useful and applicable to programming where the private sector is an active partner and/or recipient of direct support as opposed to traditional fundraising and resource mobilization efforts where the private sector is viewed exclusively as a donor. In addition, the initiative has established a comprehensive knowledge management platform that contributes towards strengthening IOM's institutional approaches to eliminate migrant worker exploitation. Through this platform, it has been able to harness the learnings that are occurring across various locations/countries, multiple private sector partners, and numerous sectors. This has helped to increase the capacity of IOM staff across all implementing countries to meaningfully engage with the private sector and promote responsible business that is inclusive of migrant workers. This new and concentrated capacity for IOM lays the foundation not only to more quickly respond to private sector needs and establish private sector partnerships, but to also build credibility within the private sector

space for greater advocacy for migrant worker rights. Information has also been regularly shared with IOM staff and external stakeholders through newsletters, training sessions, and workshops. The initiative's unique access to understanding the realities of migrant workers throughout the supply chain mappings has greatly contributed towards the sharing of thematic information with respect to migrant worker experiences throughout the migration process. These learnings have ultimately informed and helped to strengthen IOM's activities to benefit migrant workers more broadly.¹⁸

Some of the thematic learnings that have been generated through the CREST initiative have led to spin-off projects such as a new IOM initiative funded by the Laudes Foundation and Sida entitled "Strengthening Corporate Responsibility to Eliminate Labour Exploitation, Slavery and Trafficking in Apparel and Home Textile Supply Chains in Asia" (informally referred to as "CREST Fashion") that began in 2019 in Bangladesh, India, Lao PDR, and Thailand and that built off of the work of CREST and IRIS. The project's objective is to contribute towards improved protection of women and men internal and international migrant workers against exploitation, modern slavery, and human trafficking in the apparel and home textile sectors' labour supply chains in Asia.

5. CREST has achieved some important synergies with other areas of IOM's work, particularly with respect to promoting IOM's IRIS Ethical Recruitment. While the CREST initiative has organized numerous events to date to bring external stakeholders and private sector partners together to facilitate networking and synergies, CREST's private sector partners have indicated that they would like additional support that falls outside of CREST's framework and that is offered by other IOM initiatives and UN entities. (Responds to EQs 7 and 8)

The CREST initiative's work to strengthen ethical recruitment across private sector supply chains supported some important synergies with IOM's: IRIS Ethical Recruitment¹⁹ that promotes a common ethical recruitment standard and provides corresponding guidance to various stakeholders including labour recruiters and employers to promote ethical recruitment and safe migration. Throughout the first half of the initiative, it has built supplier capacity to implement due diligence processes for their labour supply chains, thus creating demand for ethical recruiters.

In addition, the CREST team supported the global IRIS project team to create a phased capacity building programme to match ethical employers with recruiters and to support the IRIS rollout through the creation of demand for ethical recruitment by working with brands and suppliers under CREST company partnerships (under output 3.2). The IRIS Secretariat launched this programme at the beginning of 2020 to address identified capacity gaps within the recruitment industries as well as provide an opportunity for labour recruiters to enhance their internal policies and systems towards alignment with ethical recruitment standards over time. To this end, 51 labour recruitment agencies were engaged to promote ethical recruitment principles through awareness-raising in 12 IRIS trainings and sensitization workshops for labour recruiters (reaching 54 women and 54 men), or through initial engagement with the IRIS capacity building programme.²⁰ The CREST project team has made efforts to establish regular communication with IRIS colleagues through regional team meetings and periodic reporting.

The CREST initiative has organized numerous events to date such as workshops, forums, and training sessions to bring external stakeholders and private sector companies together to facilitate networking and synergies. Through this networking, it has made important introductions that have, in some cases, resulted in meaningful engagement between private sector companies and UN agencies. Examples include linking UNDP with IKEA in Viet Nam, which led to a partnership; and introducing the VF Corporation (a leading apparel, footwear and accessories company whose brands include Timberland and The North Face) to the ILO Business Network on Forced Labour. This being said, some private sector partners mentioned through KIs that they would like the initiative to play a larger role in facilitating direct dialogue between the private sector and national governments to strengthen legislative frameworks to better protect migrant workers and to facilitate their work towards achieving the UNGPs. While CREST has facilitated some discussions between private sector partners and government entities, this is an area

¹⁸ CREST includes a section on lessons learned in its annual report that has also been a useful way of sharing learnings generated through the project.

¹⁹ Previously named International Recruitment Integrity System (IRIS).

²⁰ CREST Year 3 Annual Report.

of work largely pursued by other IOM initiatives, resulting in the conscious choice by the project team to limit its engagement in this area in order to avoid duplication. This potentially presents an opportunity for the initiative to more actively serve as a bridge between its private sector partners and other IOM initiatives.

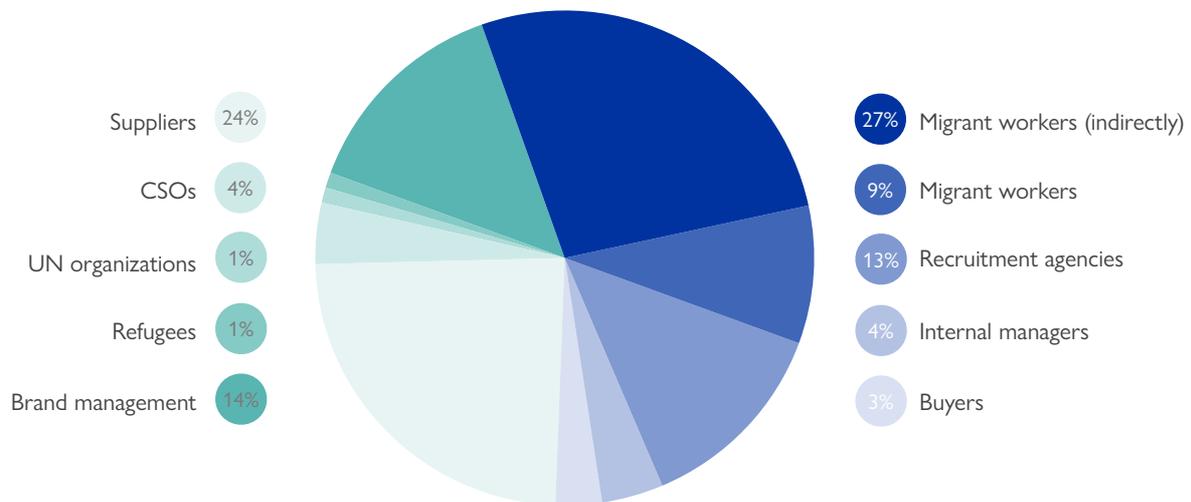
The project is early in its journey in establishing partnerships with other UN entities that could further support the private sector in addressing its human rights risks. Other actors working in similar thematic areas within the region include the UNDP Business and Human Rights (B+HR) in Asia project, UN Women on the rights of women migrant workers through initiatives such as the UN Women-ILO *Safe and Fair Programme* and the IOM-UN Women programme *Promise*, and ILO on labour rights through initiatives such as *Triangle*. It is understandable that these linkages have not yet been formally established since, as a new project, CREST has focused its efforts during the first half of the initiative on establishing effective partnerships with private sector companies. However, now that CREST has secured private sector engagement, stakeholders from the private sector, CSOs, and UN entities are looking towards it to serve as a bridge between the private sector and ongoing UN work across the region. The project could also potentially have an indirect effect on many of the outcome areas of its multi-stakeholder ToC if it were to systematically refer and connect private sector companies to existing UN initiatives across the various outcome areas. Currently, CREST does not have a formalized plan or approach with respect to how it can leverage its privileged connection with the private sector for the greater benefit of the UN system.

6. While CREST's project design and approach is migrant-centered, it places a significant focus on supporting the capacity of private sector companies to meet the UNGPs and to promote respect for the rights of migrant workers, and places less emphasis on the direct empowerment of migrant workers. Potential synergies with other IOM initiatives present opportunities to further empower migrant workers and to strengthen its direct engagement with migrant workers. (Responds to EQs 1 and 7)

CREST regularly engages with migrant workers through activities such as labour supply chain mapping to ensure that company tools and guidance reflect the experiences, needs, and priorities of migrant workers. In fact, the Migrant Worker Guidelines that were developed during the first half of the initiative to provide practical guidance to private sector companies on how to meet the UNGPs and fully respect the rights of migrant workers draw extensively on the experiences and priorities of migrant workers. This reflects how CREST uses a migrant-centered framework to support private sector companies in meeting the UNGPs and promoting the rights of migrant workers. The initiative has also developed and launched a formal partnership with the Migrant Forum in Asia (MFA), which is a network of CSOs, associations, and trade unions of migrant workers, to further integrate the perspectives of migrant workers into the project. This is an important achievement to date and will likely continue to develop and support migrant worker empowerment during the second half of the CREST initiative.

This being said, CREST's unique approach to supporting the capacity of private sector companies to address human rights risks has placed most of the project emphasis on supporting private sector duty bearers, with less emphasis on directly supporting the empowerment of migrant workers. As seen in Exhibit 1 below, whereas the most prominent group of CREST beneficiaries is migrant workers (36 per cent), these are targeted indirectly in the majority of cases (27 per cent) by supporting companies to better protect the rights of migrant workers. Only nine (9) per cent of CREST's programming to date has directly focused on empowering migrant workers through activities such as pre and post departure safe migration consultations.

Exhibit 1. Beneficiaries and rights holders targeted by CREST activities



The CREST initiative's primary focus on supporting private sector companies to meet the UNGPs is a good attempt to narrow its programming to achieve higher-level results within a particular target group. However, the initiative is strategically placed to complement this approach by further engaging migrant workers to influence company behaviour. Migrant workers have the potential to influence their employers but require support to engage directly with their employers through social dialogue and collective bargaining without fear of retaliation and/or dismissal. In many countries where the CREST initiative operates, migrant workers are not allowed to create unions. CREST's unique access to private sector companies and IOM's empowerment of migrant workers presents potential opportunities for the project to encourage companies to engage in direct dialogue between migrant workers and employers, which could provide migrant workers with potential opportunities to voice their concerns and increase their empowerment.

Another reason why the CREST initiative has had limited direct focus on empowering migrant workers has been to intentionally avoid duplication with other areas of IOM's work that has a strong focus on migrant worker empowerment. While this intent to avoid duplication is admirable, there is room to further strengthen linkages between CREST's work and that of other IOM initiatives and expertise that focus on the empowerment of migrant workers. In addition, as the initiative continues to progress and results are achieved at different points during the project lifespan, it would be important to directly engage migrant workers in measuring results to ensure that changes within the company are in fact having the desired effects on migrant workers without having to rely on information supplied by employers. Additionally, CREST staff has reported a need to receive more technical support to further strengthen their standard operating procedures (SOPs) to guide the staff on what to do when they come across migrant workers in situations of exploitation during their engagement with migrant workers, employers and recruiters. CREST staff often face complex situations in the work place where, for instance, forced labour is not defined by national laws and migrant workers are afraid to approach national authorities. There is vast experience within IOM with respect to identifying and assisting victims of trafficking (including labour trafficking) that could further support the initiative's work.

7. CREST has made some important contributions towards and has benefited from momentum within industries that already have established industry-wide private sector coalitions. Some of these coalitions would like to see the initiative demonstrate more leadership in those industries that are less advanced with respect to adopting human rights in business principles. (Responds to EQ 8)

The initiative has so far been working across different sectors, supply chain tiers, and migration corridors. While some of these are relatively new to addressing human rights in business principles (such as the agri-food, palm oil, natural stone, and rubber sectors), others have industry-wide coalitions already established to support human rights in business, such as the electronics industry. When working within sectors where industry-wide coalitions are already established, the project has been able to avoid duplication and promote collaboration with other actors by focusing on areas requiring additional support. An example of this is CREST's strengthening of the Responsible Business Alliance (RBA) members' ethical supply chain through engagement with recruiters. Working within sectors that already have industry wide coalitions also presents some advantages such as access to industry-wide champions whose momentum can be harnessed to achieve greater results. They also provide access to innovation and resources that can be later adapted to those industries that are less advanced with respect to meeting the UNGPs.

An example of the CREST initiative partnering with an industry-wide coalition to leverage results can be seen through the CREST partnership with the ILO and RBA to implement the *Fair International Recruitment Against Slavery and Trafficking (FIRST) project* in Viet Nam. The partnership received funding by the Global Fund to End Modern Slavery (GFEMS) where project partners created dialogue and stakeholder buy-in to discuss ethical recruitment and create a sustainable implementation framework. The FIRST project complemented CREST activities through delivery of qualitative research with returned Vietnamese migrant workers to better understand vulnerability risks related to modern slavery. The research results will be shared with public and private sector stakeholders with an objective to support the development of strategies by State policymakers and stakeholders. CREST complemented these activities further by facilitating capacity building on ethical recruitment and modern slavery for labour recruiters in Viet Nam in August 2020.²¹

Taking into consideration these benefits, some of CREST's institutional partners have suggested that they would like to see the initiative play a larger role in those industries where a coalition is not already present in order to expand the reach and influence of some of the good practices and momentum emerging from more established industries. A good example of complementarities that have been achieved between partners to avoid overlap and to expand business and human rights influence is the partnership between RBA and CREST to work in Nepal and Indonesia since RBA does not have a presence in those countries and IOM does. In Malaysia, the RBA and CREST joined forces to better engage recruiters associated with RBA member companies and suppliers in Malaysia.

8. CREST's branding has helped to raise awareness of the initiative within the IOM. CREST's work has also raised the awareness of IOM among CREST's private sector partners who may not have had much engagement with IOM before working with the project. However, the unique CREST branding has led to some confusion among private sector partners who may not understand the relationship between CREST and the IOM, thus potentially reducing the visibility of the IOM brand within private sector circles. (Responds to EQ 7)

The project has invested resources in developing its own unique branding.²² For instance, the CREST logo and branding is included on all external communications and visibility materials. Key informant interviews revealed that CREST's enthusiasm to brand its work and generate energy around its innovative approach to partnership development had even gone so far as to unfortunately cause a feeling among some institutional partners on more than one occasion that CREST had not provided sufficient recognition of their contributions towards joint work.

²¹ CREST Year 3 Annual Report.

²² Since the CREST initiative is a unique project within IOM and receives funding from Sida, it requires its own project identity and adequate recognition and visibility of the contributions made by the Swedish government.

The project's branding has helped IOM colleagues to better understand the package of services offered by CREST within the plethora of work and projects pursued by IOM, and has helped to raise awareness within IOM of the initiative's unique approach to programming. This internal recognition has helped the project to raise its profile within IOM, which has facilitated the sharing of information and important learnings between CREST and the wider organisation. The project's unique branding has also been useful for raising awareness of its work among external stakeholders who work on ethical recruitment, human rights in business, and migrant worker exploitation within the region and who are familiar with IOM. This being said, key informant interviews with key UN actors working in these areas sometimes revealed only a basic understanding of IOM's work through CREST and sometimes even demonstrated misperceptions with respect to CREST's approach and model. This is an important realization as it reflects some lack of understanding and limited engagement between CREST and UN actors who have the potential to partner and synergize around CREST's work. The project has made efforts to inform other UN actors of its work through its website and newsletters. However, awareness of and engagement with the project among other UN entities has been limited due to the fact that the project does not have a mechanism to regularly engage other UN actors in its decision-making, such as through an external advisory board, and that it has limited formal partnerships established with other UN entities. In addition, the fact that CREST annual reports refer to IOM and CREST interchangeably may also contribute towards this confusion.

Key informant interviews have also revealed that the CREST brand has sometimes been confusing for external stakeholders in the private sector who may not understand the difference between CREST and IOM. While private sector stakeholders are drawn to working with CREST for the unique services the initiative provides, most are interested in being primarily associated with the IOM brand due to its international reputation for quality services. For those private sector stakeholders who may have been initially unfamiliar with the IOM and its work, introducing the CREST branding has, at times, reduced clarity with respect to what it means to engage with the IOM through CREST. In a context where IOM is not necessarily widely known among the private sector, IOM staff has questioned whether the unique CREST branding and any other project-specific brandings among the private sector is conducive to strengthening the IOM brand. In response to these concerns, the CREST initiative is designing its new products and new website to better show the centrality of IOM branding. However, the CREST project is not the only initiative within IOM working with the private sector. Finding a balance between CREST and IOM branding has been a recurrent challenge that will likely continue to a certain degree throughout the remainder of the project.

5.3. EFFECTIVENESS

This section provides an assessment of the extent to which the CREST initiative has achieved its planned results and objectives, including any differential results across groups.

9. CREST has exceeded its targets and expectations with respect to engaging private sector companies and generating UNGP commitment under its Outcome Area 1 to encourage private sector stakeholders to commit to the elimination of modern slavery in their operations and supply chains in Asia. It is on track to achieve all other results under this outcome. (Responds to EQ 9)

The initiative has already met or exceeded most of its expected results targets under Outcome 1: *Private sector stakeholders commit to the elimination of modern slavery in their operations and supply chains in Asia*. As of September 2020, the project had successfully established 19 private sector partnerships (surpassing its initial target of 10 partnerships). In addition, 197 suppliers had been engaged through CREST and were working towards the elimination of worker-paid recruitment fees. The uptake of private sector partnerships under the project was totaling USD 4,615,580²³ in direct private sector contributions. This represents more than 92% of the envisioned financial target with two years of project implementation remaining, and is a strong indicator of the commitment of CREST partner companies towards the initiative. In total, CREST's work has had an indirect effect on 140,420 migrant workers (including 51,195 men, 54,687 women and 34,538 migrant workers whose gender breakdown was not available) who are employed within the supply chains of its private sector partners.

²³ Interim Report to the Development Section of Embassy of Sweden in Thailand.

Under this outcome area, CREST has been successful at providing much needed support to private sector companies to set policies and commit to human rights in business principles. For instance, a partnership with an electronics company resulted in the adoption of a policy on migrant worker rights, which signifies a strengthened understanding and commitment. CREST also supported and provided guidance to Fast Retailing to commit to the principles of ethical recruitment (i.e. no fees and costs to migrant workers, transparency of contract terms and conditions, and freedom of movement) and supported the development of company specific international recruitment standards. CREST is now working with the company to support the implementation of these principles through engagement with

and training of the company's suppliers. Also under this outcome, under Output 1.1: Increased coordination among relevant actors and initiatives that promote ethical recruitment and the elimination of modern slavery, CREST established a partnership with the Earthworm Foundation (EF) in the palm oil industry in Malaysia to address the vulnerabilities of migrant workers and to promote ethical recruitment, and successfully conducted the first cross-border labour supply chain mapping in the palm oil sector in Malaysia, India and Indonesia. This falls within CREST's target to establish three partnerships with implementing partners and to engage in concrete and innovative joint initiatives that are aligned with the project. The establishment of two other such partnerships remains to be done in order to meet the target. CREST has already achieved or is on track to achieving all of the targets identified under Output 1.2 Increased engagement with private sector stakeholders working towards a better understanding of men and women migrant worker vulnerabilities and the promotion of ethical recruitment principles, and Output 1.3: Project stakeholders have increased access to a business case for ethical recruitment and evidence-based knowledge products on men and women migrant worker vulnerabilities and modern slavery risks.

IRIS principles of ethical recruitment include:

- Prohibition of recruitment fees and related costs to migrant workers
- Respect for freedom of movement
- Respect for transparency of terms and conditions of employment
- Respect for confidentiality and data protection
- Respect for access to remedy
- Respect for ethical and professional conduct
- Respect for laws and fundamental principles and rights at work

10. CREST has provided much needed direct support to private sector companies to strengthen the implementation of UNGPs through customized tools and support. The initiative is viewed by stakeholders as being particularly strong with respect to promoting ethical recruitment throughout the supply chain. (Responds to EQs 9 and 10)

Under Outcome 2 of CREST's logical framework: *Private sector partners are taking measures to implement ethical recruitment for the elimination of modern slavery in their operations and supply chains in Asia*, CREST has developed, in collaboration with its private sector partners, tools and methodologies that are customized to meet the specific needs of the company and sector. Some of these tools and methodologies include an ethical recruitment due diligence tool kit; a supplier self-assessment tool; a progress monitoring framework; pre-departure/post arrival orientation (PDO/PDA) tools; and migrant worker guidelines to promote the ethical treatment of migrant workers throughout their migration journey (i.e. pre-deployment, deployment, employment and return). In addition, CREST developed an Ethical Recruitment Roadmap to provide guidance to private sector companies on how to ensure ethical recruitment throughout their supply chains, and organized a Joint Ethical Recruitment Roadmap Workshop in Bangkok on 17 September 2019, which was attended by multi-stakeholder representatives from diverse organisations working on ethical recruitment throughout Asia.²⁴ CREST has been particularly successful at conducting labour supply chain mappings with its private sector partners to identify where the greatest risks for exploitation are likely to be found in the supply chain. As mentioned in Finding 1, the customized nature of these tools and support has been highlighted by private sector partners as one of CREST's greatest strengths and added value.

The initiative has also supported training sessions and workshops to share knowledge and build internal capacity around how to use these tools within the companies, and developed a CREST Training Programme. In fact, CREST has provided 54 trainings since its inception, reaching 914 people (494 women, 382 men, 38 participants where no gender breakdown is available), which is nearly reaching its final target of 1,000 people. Training sessions have also surpassed the established target of 80 per cent satisfaction rate among trainees by achieving a satisfaction rate of 86.2 per cent.²⁵ CREST has already achieved or is on track to achieving all of the targets identified for this outcome.

²⁴ These organisations included the ILO, UNDP, OECD, the Institute for Human Rights and Business (IHRB), the Consumer Goods Forum (CGF), the Fair Labor Association, the Migrant Forum Asia (MFA), Embode, Liberty Shared, and Earthworm, as well as multiple international companies.

²⁵ CREST Year 3 Annual Report.

The outcome area has been funded directly by private sector companies, which reflects the ability of the work under this outcome area to address the identified human rights risks and challenges that migrant workers face and to provide practical and process-oriented guidance to businesses to help them meet their human rights obligations. The CREST initiative is currently working on making these tools open-source so that they can be shared widely. Key informant interviews have revealed that CREST is well known and perceived among partners and stakeholders as being particularly strong at promoting ethical recruitment. This is due to a variety of factors that include a strong interest from the private sector to strengthen ethical recruitment; prioritization of ethical recruitment by industry leaders such as the Leadership Group for Responsible Recruitment that has identified unethical recruitment practices as a root cause for the exploitation of migrant workers; CREST's own data and learnings from its mapping exercises that highlight the need to address a faulty business recruitment model and strengthen regulatory frameworks; and support provided through the global IRIS initiative.

11. CREST's remediation work has focused largely on supporting private sector companies to understand the importance of remediation, identify human rights abuses and outline the steps required to set up remediation mechanisms. In some cases, CREST has also successfully supported companies to set up and begin implementing remediation processes. However, some of CREST's partners are looking for labour law expertise to support the implementation of remediation mechanisms that they do not necessarily associate with IOM's skillset. (Responds to EQs 9 and 10)

CREST has provided some important technical support to private sector companies under Outcome 2 of its logical framework to identify human rights abuses through its labour supply chain mappings and facilitate the design and set-up of remediation systems aimed at providing remedy to those migrant workers employed by the company who were not recruited through ethical means or who experienced a human rights abuse. For instance, after a labour supply chain mapping exercise led by CREST, one of its partners in the electronics sector committed to reimburse migrants for recruitment costs and has even started to reimburse some of those costs. Another example is CREST leading a consultative process to develop Operational Guidelines for Business on Remediation and to design an alternative dispute resolution mechanism to pilot as an industry wide remediation mechanism in the electronics sector, in partnership with The Remedy Project.

CREST plans to prioritize remediation work throughout the remainder of the project and is exploring how IOM can further support its work in this area. While key informant interviews have highlighted appreciation among private sector stakeholders for CREST's support to develop strong prevention systems and to better inform partners with respect to the principles of remediation, some of its private sector partners have expressed an interest to work with a specialized entity to implement remediation systems that would include mechanisms that support migrant worker access to justice. For this kind of implementation support, CREST and the IOM are not perceived by several private sector partners as having the sufficient technical capacity in the area of remediation to meet their needs. For instance, some companies would like to establish remediation mechanisms that are managed by a third party that can provide legal advice to both migrants and the company and that can independently settle labour disputes. Most of CREST's partners believe that the ILO is best placed to lead justice and remediation mechanisms due to its strong labour law expertise, thus signaling a potential opportunity for ILO and CREST to work together collaboratively to meet the remediation needs of CREST's private sector companies throughout the remainder of the initiative.

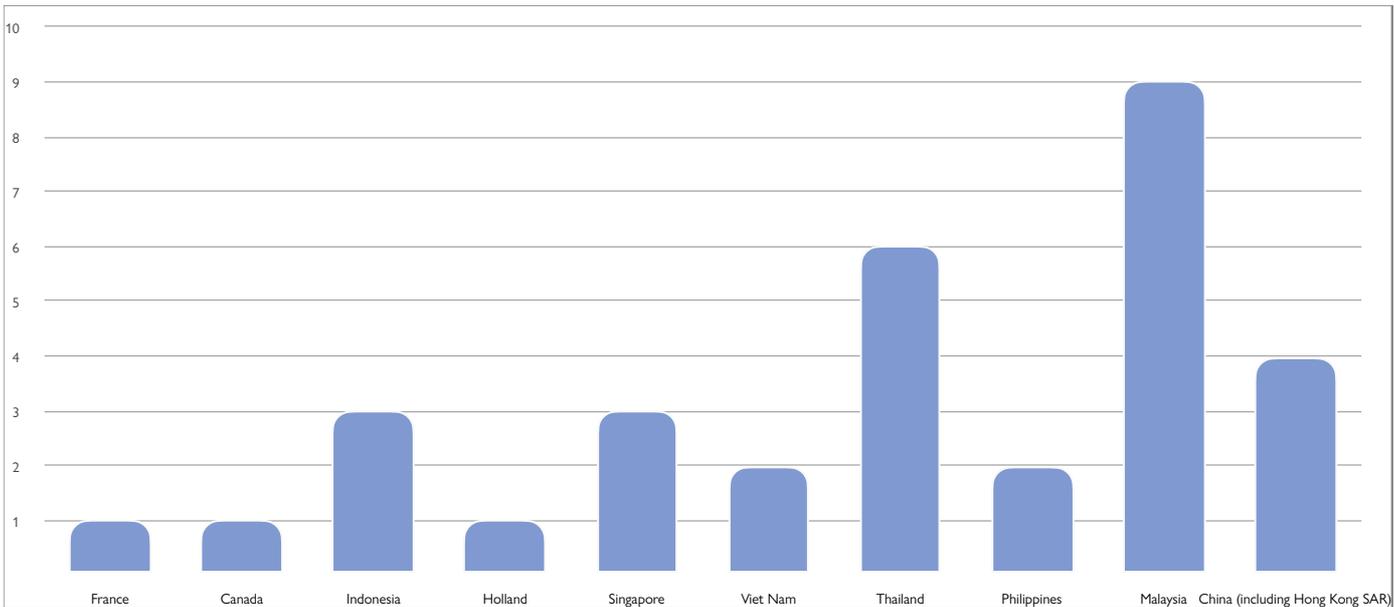
12. The first half of the CREST initiative has focused largely on establishing partnerships with private sector companies (under outcomes 1 and 2), with less progress achieved around engaging with multi-stakeholder platforms to create an enabling environment for ethical recruitment and the elimination of modern slavery (outcome 3).²⁶ However, this is to be expected considering the project's development trajectory. Its successful establishment of partnerships has built the necessary foundation to further advance outcome 3 during the remainder of the initiative. (Responds to EQs 9 and 10)

²⁶ CREST's results with respect to supporting IRIS, which falls under this outcome are discussed under Finding 5.

The achievement of results with respect to CREST's *Outcome 3: Private sector stakeholders effectively collaborate with multi-stakeholder platforms to create an enabling environment for ethical recruitment and the elimination of modern slavery* have advanced at a less rapid rate than results in CREST's other outcome areas (namely outcome 1: commitment and outcome 2: implementation). While CREST has organized a number of trainings, capacity building and multi-stakeholder consultations, workshops, and webinars, its support to civil society organisations (including migrant worker associations and networks) has been more limited.

Exhibit 2 below identifies the number of multi-stakeholder dialogue events organized by CREST or those in which CREST participated, and the country where they took place.

Exhibit 2. Multi-stakeholder dialogue events organized by CREST or those in which CREST participated in

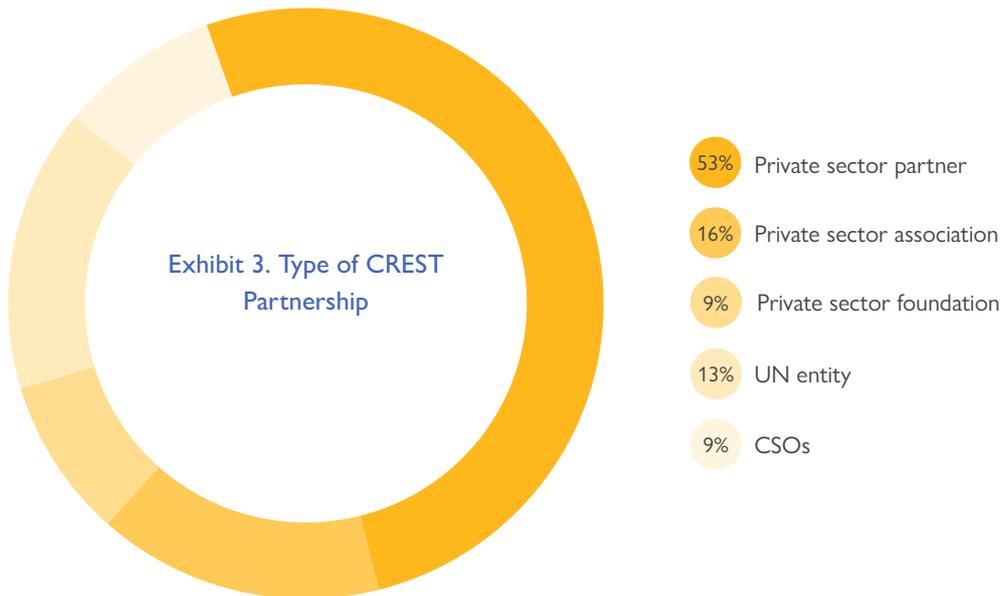


CREST has met or surpassed most of its results targets related to organizing workshops and webinars to promote ethical recruitment and safe migration. For instance, CREST has successfully hosted 24 (out of a total target of 25) stakeholder events to share project learnings and disseminate information via regional and national multi-stakeholder platforms, reaching 1,266 stakeholders (including 576 women, 660 men, and 156 participants where a gender breakdown is unavailable). It has also nearly met its results targets with respect to making thematic contributions towards multi-stakeholder events. In fact, CREST has made 59 thematic contributions out of a total target of 60.

As can be seen in exhibit 3 below, CSOs currently account for nine (9) per cent of CREST's current partnerships. As already mentioned in Finding 6, the initiative has secured a long-term strategic partnership with the MFA. This important achievement is the result of sustained interactions and consultations, including trust building, between the IOM and the MFA, and is the first time that the two organizations have signed such a regional partnership agreement, which was then followed by a global memorandum of understanding (MOU) at HQ level. The partnership aims to strengthen the capacity of civil society to engage with the private sector on protection of migrant workers, and aims to include civil society in the solutions with the forthcoming IRIS monitoring and compliance mechanism. In addition, it aims to strengthen the voice of migrant workers in the solutions developed for and within multinational enterprises' international supply chains.

Unfortunately, the rollout of this partnership has been delayed due to COVID-19. Planned activities were amended and postponed, and a contingency plan was developed to increase the early engagement and progress with implementation as quickly as possible under COVID-19 circumstances. Where feasible, preparatory activities have been moved to online activities such as the development of an online assessment, gathering information and assessing the needs of MFA members, launching a webinar series,²⁷ and promoting private sector engagement.

²⁷ <https://crest.iom.int/news/leveraging-technology-strengthen-migrant-worker-protection-lessons-learned-mfa-iom-webinar>.



CREST's partnership with the MFA is strategic in nature and presents opportunities to engage migrants by working with a regional intermediary who has direct connections with migrants at the country level and that can facilitate access to migrant worker organisations in countries where CREST may wish to expand its reach. CREST's logical framework sets a target of engaging 18 CSOs to collaborate with private sector actors to apply a more migrant-centred approach to labour recruitment. However, it reports engagement with only one (i.e. the MFA) even though the MFA represents numerous CSOs at the grassroots level. This suggests either that the initiative intends to further expand its engagement with migrant worker organisations during the second half of the initiative beyond its engagement with the MFA or that it should report differently in its results framework to consider the grassroots CSOs that make part of the MFA.

13. A number of unexpected results have emerged from the CREST initiative to date. (Responds to EQ 11)

The evaluation has identified three unexpected results emerging from CREST's work to date, as follows:

Unexpected Result #1: The CREST initiative's labour supply chain mappings have uncovered cases of forced labour and human rights abuses that have, in some instances, resulted in remediation by the private sector company. CREST's labour supply chain mappings that are designed to support private sector companies to understand their human rights risks uncovered cases of forced labour and human rights abuses within their supply chains. The project was able to successfully raise the awareness of its private sector partners to these violations, which resulted - in some cases - in remediation towards the migrant workers by the private sector company. This remediation as a result of CREST's labour supply chain mapping is a positive result that emerged outside of the initiative's results framework.

Unexpected Result #2: The initiative has prioritized the establishment of strategic partnerships with the private sector and would like to itself be perceived as a strategic partner. While some partnerships with private sector companies have become strategic over time, not all private sector partners view their partnership with CREST as strategic. While CREST's outreach strategy allows for the formation of different types of partnerships with the private sector, the initiative prioritizes the establishment of strategic partnerships with private sector companies and would like to itself be perceived as a strategic partner. In some cases, private sector companies who contacted CREST for particular services such as training became strategic partners over time and have contributed towards industry-wide strategic advancements. Even so, key informant interviews revealed that some of CREST's partners currently view it largely as a service provider and do not have a clear understanding or vision as to how the partnership could be built in a more strategic way over time. This could be due to a number of factors that may likely include a rudimentary understanding among partners of the challenges and opportunities present with respect to aligning their company behaviour to human rights in business principles. It could also be due to a general lack of understanding among some private sector partners of the kinds of services and support that the initiative, as a UN project within the IOM, could provide to support their long-term development in a strategic way. Another factor could be that IOM is not structured to provide an

“account manager” as private sector companies are often used to that would coordinate the partnership across all countries and levels of the organisation. This finding highlights that more work is required to raise awareness among private sector companies around human rights in business challenges and opportunities and the unique strategic role that the CREST initiative, as part of the UN, can play to support them to be better aligned with the UNGPs.

Unexpected Result #3: Although it cannot be independently verified, stakeholders have reported on two occasions that CREST’s engagement with migrant workers at an individual level may have caused the worker unnecessary risk of employer reprisals. During key informant interviews, two institutional CREST partners¹⁹ raised a concern on two separate occasions stating that CREST had invited a single migrant worker to participate in a panel discussion, which could potentially put the individual migrant worker at risk of harm due to potential employer reprisals. Both stakeholders suggested that CREST engage with collectives of workers as opposed to individual migrants in order to better protect them. However, it should be noted that in both cases, the stakeholders were clear that a single migrant was included as part of a CREST panel but they could not recall the exact event, making it impossible to verify their statements. Supporting documentation for CREST events did not reveal any evidence to support these claims. Therefore, this finding should be read with caution due to the inability to independently validate it.

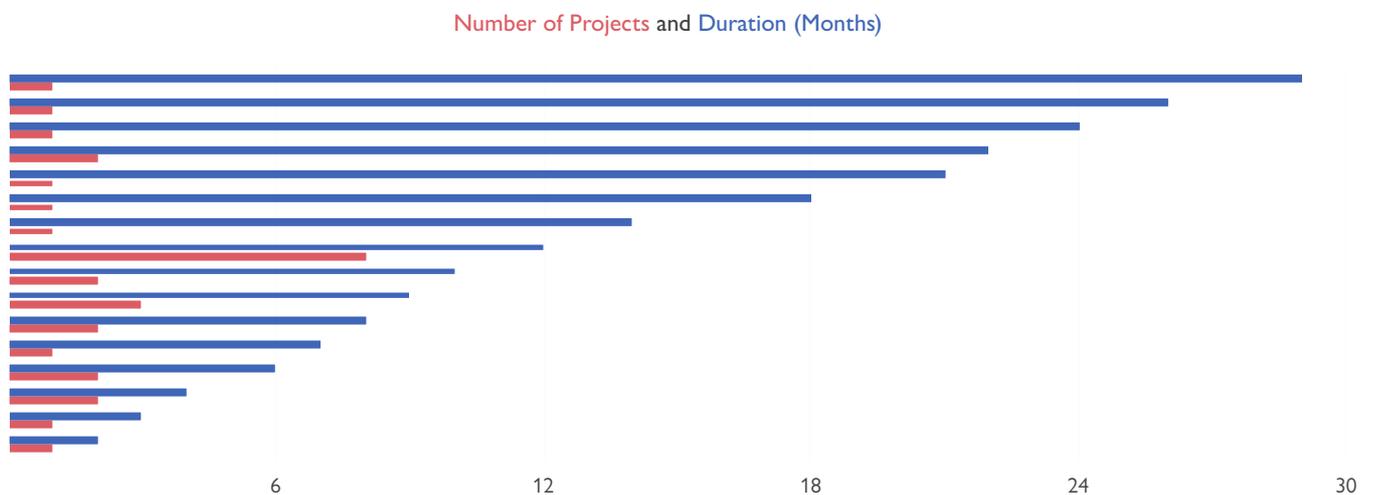
5.4 EFFICIENCY

This section provides an assessment of the extent to which the CREST initiative has delivered results in an economic and timely way.

14. Significant investment in time and human resources has been required to set up most private sector partnerships. While much of this investment has resulted in the establishment of 19 partnerships, in some cases partnership development did not come to fruition. Engaging with companies that have strong senior management commitment towards the UNGPs tends to increase the likeliness of forming a strong partnership. (Responds to EQs 12 and 13)

The initiative’s successful establishment of 19 partnerships has been a major project success and is the result of significant investment by the CREST project team. As exhibit 4 indicates, the duration of the projects implemented by CREST in partnership with private sector companies ranged between two (2) and 29 months. The most common project duration was 12 months, with eight (8) projects lasting this long. There is evidence that the majority of projects span over a significant period of time. In fact, out of 30 individual projects, 16 lasted a year or more, which is testimony to the trust and commitment of partners towards CREST. The portfolio review has identified that most (69 per cent) of partnerships with private sector companies were established by companies reaching out directly to CREST, largely by means of word of mouth or business referrals.

Exhibit 4. Number of CREST projects and their duration



Establishing a relationship, building trust, articulating the importance of the issues and the company's obligation in addressing them, and negotiating the terms of a partnership are both time consuming and require significant human resource investment. While this is an essential part of CREST's work and facilitates the achievement of results, partnership development remains a resource-intensive component of the project. For instance, one staff member reported spending half of their CREST-specific time on establishing partnerships. It is also a component that does not receive direct financial support from the private sector and therefore reflects the importance of traditional donor financing²⁰.

While the initiative has successfully established many partnerships that have gone on to produce important results, there have also been instances where investments in partnership development have not been commensurate with the size of the partnership and/or have not resulted in partnership formation. For instance, one partnership took nine (9) months to set up when the project itself only lasted six (6) months. In another example, CREST engaged in partnership development for two years with a multinational company who later revealed that they wanted to invest only 10,000 USD into the partnership and eventually decided not to work with CREST because they chose to work in a country where CREST is not operational. The risk of potential partnerships not coming to fruition is a risk faced by any initiative that aims to engage new partners. However, the level of investment in partnerships that do not come to fruition is a project consideration and potential risk that must be strategically managed. The efficiency and sustainability of the initiative can be put at risk if significant resources are invested into partnerships that do not materialize or that are not commensurate with the level of investment required to secure them, including the potential impact of the partnership. Currently, while CREST conducts a due diligence assessment, it does not have a formal risk management process in place to guide strategic decisions with respect to how much investment should be made to establish a new partnership, including a financial risk analysis to establish when partnership development should be halted. While IOM's HQ conducts a risk analysis before engaging with any particular partner, the risk analysis is based largely on reputational risk. There is no formal risk analysis done with respect to the financial risk of trying to engage with a company that may not lead to an established partnership.

Engaging with companies that have strong senior management commitment towards the UNGPs tends to increase the likeliness of forming a strong partnership. This being said, even when company headquarters have made global commitments in line with human rights principles, the departments working on implementing these principles (typically the sustainability and sourcing departments) are often under-staffed and under-resourced, making implementation more challenging. While some private sector stakeholders have found it more practical and less bureaucratic to work directly with CREST at the regional level as opposed to engaging in lengthy and formal discussions at the HQ level, others have suggested that it might be worth exploring whether increased dialogue directly with the headquarters of private sector companies (potentially through the engagement of IOM's HQ) might help to support more commitment from private sector companies towards endorsing the UNGPs.

While it may be most efficient to focus on establishing partnerships with companies that have already made a basic commitment to business and human rights principles and/or those who have allocated sufficient resources to implementing the UNGPs, partnerships with companies that are early in their UNGP journey may result in more impactful results since small steps with less advanced actors could potentially have a greater impact on the lives of migrant workers than bigger steps with more advanced actors. This is a strategic decision that CREST often has to make to weigh the pros and cons of the potential benefits of engaging with companies early in their journey versus the risks of partnerships not coming to fruition or being more resource-intensive than they are worth. The project currently has a partnership portfolio that is varied with a mixture of large and small companies from different regions and those who are already committed to the UNGPs and others who are early in their journey. This diversity helps to balance some of the potential benefits and risks of engaging with new partners.

15. The CREST initiative has established an innovative funding model that facilitates the provision of customized support to private sector companies. Even though providing customized support may not be as efficient as providing standardized services, it has allowed the project to effectively target the needs of each company and engage them in working towards the UNGPs. (Responds to EQ 13)

CREST has developed an innovative funding model to fund both its support to private sector companies to strengthen their engagement towards the UNGPs as well as its strategic work regarding cross-industry collaboration and thought leadership. Its model draws on three distinct sources of funding: 1) donor funding (from Sida); 2) private sector funding (from the Laudes Foundation); and 3) direct funding from private sector companies for support provided through partnerships under Outcome 2 of CREST's logical framework. This mixed approach has enhanced commitment and contributions from the private sector towards the initiative (mainly but not exclusively under outcome 2) while facilitating its strategic and convening work that falls under Outcomes 1 and 3 (which is funded by Sida and the Laudes Foundation). It also ensures that CREST does not directly subsidize the private sector since the companies directly pay for support provided to them. As a UN project that receives funding from Member States, CREST does not have the authority to provide financial support to the private sector, even if it is to work towards meeting the UNGPs. This is why the mixed funding approach with direct private sector funding contributions is so essential to the initiative's successful financial model.

Within this mixed funding model, CREST has further developed an innovative way of allocating private sector funding per result by dividing up and allocating staff time per output. Due to the fact that the CREST team provides direct services to support private sector companies, the initiative experiences high office ratios of 80 – 90 per cent. By dividing and allocating staff time per output, CREST has been able to demonstrate how staff time directly contributes towards the achievement of results, therefore converting what is typically seen as an administrative/management cost within the UN system to inputs that directly contribute towards results. This innovative set-up has been made possible due to the more flexible nature of private sector funding than that of traditional UN donors. Private sector companies are interested in paying per deliverable and are not concerned with staff and office ratios, in comparison with traditional donors that are often required to limit the amount of financial support towards these areas. However, private sector funding comes with some constraints, as companies are often most interested in supporting activities that fall under Outcome 2 such as supply chain mapping as opposed to some of CREST's strategic work under Outcome 3. It should also be noted that even though the private sector is generally more flexible with respect to funding arrangements than traditional UN donors, Sida has demonstrated particular flexibility and accommodation throughout the project to date.

Although providing customized tools and materials for each private sector project is time consuming and resource heavy, it is this degree of customization, as explained in Finding 11, that hooks the private sector into working with the IOM and inevitably with the UN system to advance human rights due diligence and achieve the UNGPs, as it allows for a tailored approach that can meet each company's specific needs. Since its inception, CREST has experienced rapid expansion both in terms of geographic and thematic coverage. While the project started working in six programme countries, its work has expanded to countries like Nepal, Indonesia, India, Myanmar, Japan, Republic of Korea, and the Czech Republic, among others. Its thematic scope has also expanded to cover an increasing number of industries such as the rubber and palm oil sectors. Project expansion may be useful to tackle the size and complexities of the problems that the CREST initiative aims to address. However, while the size of the team and the resources have so far kept pace with this expansion, it has been challenging to manage the customized nature of the initiative within such a rapidly expanding context.

16. As part of the UN system, IOM must follow a more administrative process (especially during the project set-up period) than what private sector partners are used to. CREST has found it helpful to use a clear onboarding process to articulate what it means to be partnering with a UN agency in order to understand potential benefits as well as to set realistic expectations. (Responds to EQ 12)

As an IOM project, CREST must follow internal rules and regulations, which are more time consuming and administrative than what most actors in the private sector claim to be used to. In fact, all projects (even small ones) must go through IOM's formal project development process, which is very time consuming and labour intensive for the CREST team and particularly impacts the efficiency of smaller projects. While much of CREST's work has been

Some of CREST's implementing and private sector partners have suggested that the IOM further streamline its administrative processes, such as eliminating the requirement to provide hard copies of all contracts, receipts, and invoices; reducing the processing time required by IOM for decision-making; etc.

quite timely, the project development process often causes delays during the project set-up period as a result of slow project approval and activation processes as well as lengthy negotiations over NDAs. Key informant interviews have revealed that these delays have at times caused frustration and anxiety among some private sector partners who do not understand the reasons for such delays and worry that the project may not go forward. There have even been instances where lengthy negotiations have contributed towards some partners deciding to not go forward with CREST. In some instances, delays during the project set-up period caused projects to have to be implemented within a shorter timeframe, thus rushing some key activities. In one case, key informant interviews explained that one of CREST's private sector partners requested support to produce a migrant workers survey but because of some delays in approving the survey within IOM, the partner decided to go ahead with their own survey since they could not afford to wait.

Within this context, CREST staff has found it helpful to use a clear onboarding process to articulate what it means to be partnering with a UN agency in order to understand potential benefits as well as to set realistic expectations. At the same time, project staff has been communicating with IOM the importance of improving its business processes to be more responsive and timely in order to remain and further become an appealing partner to the private sector.

17. CREST has a well-functioning internal M&E system that uses a strong results framework and that collects data on a regular basis. Even so, it struggles at times to obtain results reporting from its private sector partners, and in some cases, it has not yet been able to share information and report on results to the extent that would be typically expected from a UN project due to NDAs. (Responds to EQ 14)

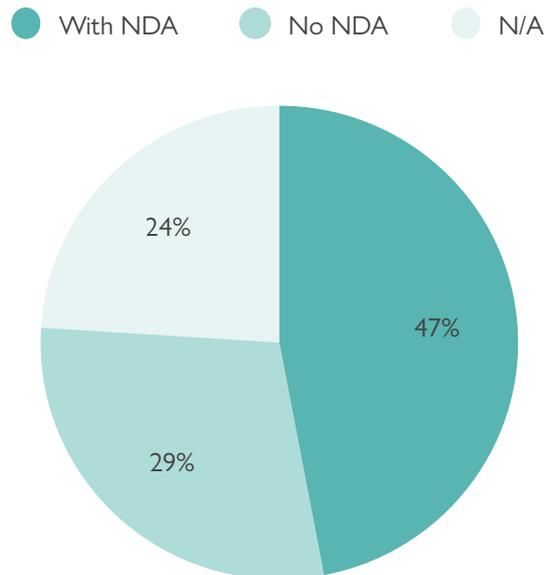
CREST has a well-functioning internal M&E system in place that facilitates the rapid sharing of information on a monthly basis, which then feeds into its reporting²¹. The project uses a well-constructed logical framework with established baselines, targets, indicators, and progress markers that are aligned with the SMART²² principles of results management. CREST's annual reports provide a comprehensive narrative that outlines results achieved per project outcome area and that pulls together information from across countries and all 19 partnerships. They also include an up-to-date logical framework that reports on results against specific indicators. This helps to facilitate the sharing of information and reporting on results.

Even though the initiative has a strong internal M&E system, it has struggled at times to obtain information from its private sector partners with respect to the outcome level results of their work together. Most of CREST's support is focused at the output level. In order to report on outcome level results, companies would need to share information on how the outputs have contributed towards outcome-level change within their companies and supply chains. However, many of CREST's private sector partners are cautious to share sensitive information internal to the company with the project and are hesitant to embrace reporting on sensitive human rights issues. To protect this sensitivity, CREST's private sector partners have largely not been contractually obligated to report to CREST on how outputs have contributed towards outcome-level change within the company. For instance, while CREST supported a private sector company in the electronics industry to establish a remediation system, the initiative does not have access to information that is kept confidential within the company with respect to how much money has been paid out through it. Another example was when CREST trained a company training team to provide training to recruiters but then struggled to receive information on how many recruiters had been trained by the training team.

Even when the project does have access to data and information pertaining to results, it has in some cases been difficult to share this information publicly due to non-disclosure agreements (NDAs) signed with private sector partners. NDAs are tools that are often used in the private sector to protect the privacy and reputational risks of both parties involved in a commercial transaction. This protection of privacy can be beneficial for the private sector company, particularly if they are willing to improve their alignment with HRB principles but are not willing to publicly share this information. It can also be beneficial to a UN agency such as IOM to avoid "bluewashing" where a private sector company could potentially improve their public image by being associated with the UN without investing in improving their HRB alignment. However, NDAs can also significantly limit the amount of information that can be publicly shared by the UN with respect to its work with the private sector. While CREST has

been able to report on aggregate results, in certain cases CREST has not yet been able to publicly share the names of some of its private sector partners. This limits the sharing of information and transparency that the IOM can provide with respect to its private sector work. As exhibit 5 indicates below, nearly half (47 per cent) of CREST's private sector partnerships have non-disclosure agreements (NDAs) while the other half do not. A little less than a third (29 per cent) of partnerships with private sector companies did not use NDAs while the remaining partnerships did not require a discussion around NDAs due to the already public nature of their collaboration.

Exhibit 5. Percentage of CREST partnerships with non-disclosure agreements



“Knowing and sharing” is an important value within the UNGPs. The UNGPs encourage private sector companies to be transparent and to self-report on their efforts to align with business and human rights principles. NDAs can present a challenge to fulfilling the UNGPs’ value of “knowing and sharing.” While the CREST initiative reports by sector, not naming all company partners can make results on the ground less visible. Some other UN entities working on business and human rights disclose the names of all of the companies that they are working with. However, this may be easier for entities if they are working on less sensitive human rights issues and company performance than CREST and its partners.

CREST has been able to mitigate some of these challenges by negotiating NDAs that provide some flexibility with respect to information-sharing; by reporting on results in an aggregate way; and by sharing its tools and methodologies through open-source platforms. The project has also been active in promoting knowledge sharing through joint panels, publishing articles, and sharing aggregate results through its annual reports. In addition, there have been some cases where private sector partners have self-reported on results through auditing exercises. Some partners that use NDAs have mutually agreed with CREST to engage in external communications and reporting such as Ikea who is considered as industry-wide champions. The CREST initiative has also been able to negotiate the lifting of NDAs over time with some partners. Therefore, even if NDAs exist, this demonstrates that there is room to negotiate increased external communications and reporting as part of the agreements.

5.5. POTENTIAL IMPACT

This section provides an assessment of the extent to which CREST project results are likely to contribute towards the project goal and have a lasting impact on the lives of migrant workers.

3. CREST's direct approach has helped it to establish trust, develop a strong working relationship with private sector companies, and build a network of stakeholders to support its goals. Now that the project is well established, some of

CREST's partners who participate in coalitions of private sector companies would like to see CREST take a more industry-wide approach that could further showcase and leverage the momentum of its work across companies.

(Responds to EQ 15)

Through the development of customized tools, CREST has been able to test its tools and develop good practices that have then been implemented on a wider scale across multiple companies and industries. One example of this approach coming to fruition can be seen through the work done with IKEA where labour supply chain mapping was established as a good practice and was then implemented widely across CREST's private sector partnerships²³. Throughout 2017-2019 the initiative has implemented seven (7) labour supply chain mapping assessments in ten (10) countries across the electronics, rubber, agri-food, quarrying, and garment and footwear sectors. In doing so, it engaged 11 brands, 157 suppliers, 103 labour recruiters and 14 sub-agents. The initiative also interviewed more than 550 migrant workers on their recruitment and employment experience, ensuring centrality of the migrant voices, right-based approach, respect of confidentiality of information, transparency, and multi-stakeholder collaboration. Labour supply chain mapping has generated significant interest to be applied in additional target sectors and migration corridors by multiple stakeholder groups (e.g. in the areas of palm oil, fisheries, sugar, hospitality). The initiative is currently developing an open source Labour Supply Chain Mapping Guide to further share information on this approach and to facilitate all types of businesses and relevant organisations to identify, prevent and mitigate risks related to the recruitment, employment and return of migrant workers in their operations and supply chains.

CREST is also engaged with a number of private sector companies (including IKEA and adidas) that contribute strategically towards generating positive momentum across their industries through engagement with coalitions such as the Leadership Group for Responsible Recruitment, Responsible Business Alliance (RBA), the Fair Labour Association (FLA), and the Consumer Good Forum (CGF). For instance, the initiative worked with FLA and the private sector brands adidas, Puma and New Balance to carry out a joint mapping study of the natural rubber supply chain in Viet Nam. It also worked with RBA to develop and test strategies and tools to reduce instances of exploitative working conditions, particularly forced labour and debt bondage, experienced by Vietnamese women and men migrant workers as part of the FIRST (Fair international recruitment against slavery and trafficking) Project. Additionally, through its partnership with RBA in Malaysia, CREST continued to promote the ethical recruitment of migrant workers through the pilot of the Responsible Recruitment Program (RRP) designed to strengthen ethical recruitment of migrant workers between Malaysia, Indonesia and Nepal. The initiative also recently launched the project Aligning Lenses Toward Ethical Recruitment (ALTER) in collaboration with the Sustainable Hospitality Alliance to improve recruitment industry practices by supporting and incentivizing the effective, sustainable adoption of ethical recruitment in the Philippines, with particular emphasis on hospitality workers. Additionally, an example of strategic support provided by one of CREST's private sector partners can be seen when adidas participated to represent the views of the private sector in a public online webinar co-organized by CREST and the Migrant Forum in Asia (MFA) that explored the impact of the COVID-19 pandemic in the recruitment of migrant workers and that discussed how to build back better post-COVID-19 in line with advancing the ethical recruitment of migrant workers.

Now that CREST is half way through its implementation and has successfully secured numerous partnerships, key informant interviews have revealed that stakeholders would like to see it take an even more active role in establishing linkages between companies and facilitating momentum among companies within each industry. Continued one-on-one support with private sector partners will continue to be necessary as companies work towards meeting the UNGPs and ongoing partnerships require CREST's engagement to support implementation, measuring impact, and reporting on results. However, in addition, linking companies through a whole-of-industry approach can continue to leverage good practices and momentum across companies by showcasing champions and creating a snowball effect, potentially generating synergies that can have a bigger impact on industries as a whole. CREST's strategic partners would like to see it play a larger role in engaging across companies; sharing information across an industry (such as sharing information on the needs of migrant workers throughout their migration journey); and providing technical assistance to policy makers and regulators to facilitate the consistency of rules and regulations across migration corridors.

19. While the project will generally require some time for its outputs and outcomes to produce impact-level effects, the CREST initiative has already achieved some positive direct impact on the lives of migrant workers particularly through company-led remediation efforts. (Responds to EQ 15)

CREST's overall support to private sector companies to uphold the human and labour rights of migrant workers is on track to achieving a positive impact in the lives of migrant workers. Its activities that support the development of company policies, the reimbursement of recruitment fees, and increased understanding and engagement on the topic of ethical recruitment are a few of many examples of how outputs are on track to contributing towards outcome and impact-level change. As the project is only at its mid-point and much of the work is ongoing, it will take some time before outputs and outcomes will visibly contribute towards impact-level results. In fact, to measure progress on ethical recruitment, it will be necessary to wait for new migrant workers to go through the recruitment process, which has been delayed in many cases as a result of the travel and migration restrictions during the COVID-19 pandemic.

As the impact of the project becomes more apparent with time, it will be crucial for the initiative to capture impact-level changes. Currently, CREST's results framework does not include useful indicators at the impact-level²⁴. The impact-level indicators (presented in the results framework as indicators for the overall objective) capture the number of migrants who have been reached but do not capture changes in the lives of migrant workers, apart from incidences of modern slavery and human trafficking in Asia. More specific impact indicators that can measure concrete changes in the lives of migrant workers would be necessary to understand the impact-level effects of the project on migrant workers. In addition, as discussed in Finding 18, many of CREST's partners are hesitant to publicly report on sensitive human rights work. There may also be unintended effects at the impact level that would need to be captured by the project such as resistance from employers to hire as many migrant workers when facing increased costs that arise when truly respecting the human rights of migrant workers.

Even though some time will be needed to directly observe most of the project's impact-level results, the initiative has already produced some positive direct impact in the lives of migrant workers. As discussed in Finding 14, through CREST's labour supply chain mapping projects, the initiative identified cases of forced labour and unethical recruitment practices. While respecting confidentiality and protecting migrant workers from harm throughout the supply chain mapping exercises, CREST was able to bring these instances to the attention of its company partners. In many cases, the company partners provided remediation to the migrant workers. This includes returning passports to migrant workers and the repayment of recruitment fees and costs to approximately 3,700 migrant workers across five (5) countries. This information also serves as a baseline to inform corporate policies and procedures to further prevent exploitation.

5.6 Sustainability

This section provides an assessment of the extent to which the net benefits of the CREST initiative are likely to continue.

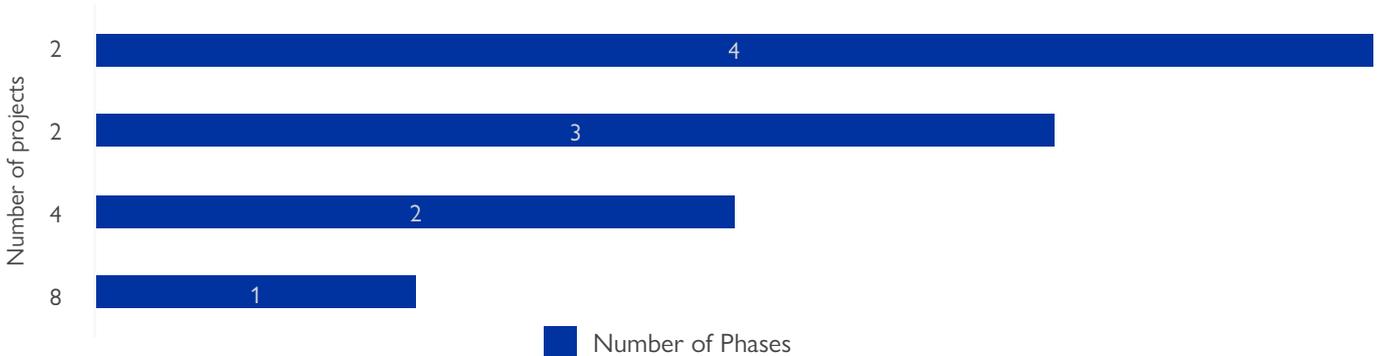
20. CREST is using a systems building approach to support sustainability. (Responds to EQ 16)

By working with private sector companies to build their capacities to eliminate migrant worker exploitation across their supply chains, CREST is using a systems building approach to ensure the sustainability of its results. It has invested its resources into strengthening the internal policies, mechanisms and capacities of companies to identify and address migrant worker exploitation with the aim of meeting the UNGPs. In some instances, CREST's support for the development of company policies to promote the UNGPs have led suppliers and other actors down the supply chain to also follow suit. It has also fostered knowledge sharing through peer reviews, participation in multi-stakeholder dialogues, publications, and newsletters to support a more system-wide approach to eliminate migrant worker exploitation throughout private sector supply chains. The provision of training as a means to support capacity development has been particularly conducive to sustainability, especially through the training-of-trainers approach that was used in multiple instances across CREST programming.

CREST is also building sustainable programming through subsequent project phases with private sector company partners in order to continue pursuing collaboration until the company fully meets the UNGPs. In fact, half of the projects between CREST and its private sector company partners have so far gone on to establish at least a second phase. As outlined in Exhibit 6 below, out of these projects, a quarter (2 out of 8) had a third phase while another quarter (2 out of 8) had a fourth phase. This suggests that CREST is successfully developing trusting and mutually beneficial partnerships where both parties see the value in

continuing their work together. This promotes both the sustainability and impact of project results as well as improved disclosure and increased reporting over time.

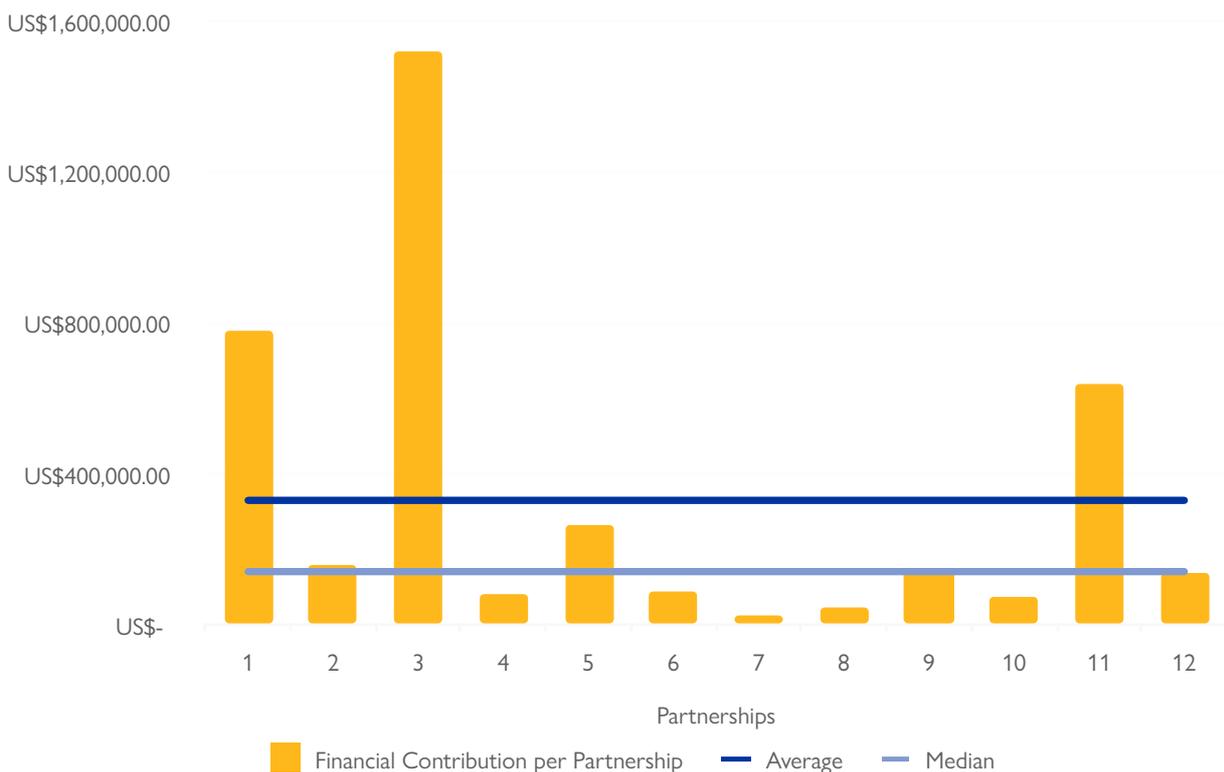
Exhibit 6. Number of phases per CREST project



21. CREST has nearly met its private sector contribution financial goal at the end of its 3rd year, which secures the project’s sustainability until September 2022. However, it is unclear whether and how the CREST Initiative will be sustainable after this point. (Responds to EQ 17)

The fact that CREST has achieved approximately 92 per cent of its five-year private sector funding target after only the end of its third year has essentially ensured its financial sustainability until the end of the project period in September 2022. As can be seen from Exhibit 7 below, private sector company financial contributions have ranged from US\$48,592 to US\$1,519,589 per partnership²⁵. On average, private sector company partners contributed US\$329, 132.58 per partnership whereas the median of these contributions was US\$140,159.72.

Exhibit 7. Private sector company financial contributions per partnership



These financial contributions made by private sector company partners are a major project success and validate the sustainability of the private sector component of CREST's funding model. While direct payments for support provided to private sector companies have covered CREST's Outcome area 2 and have also contributed towards CREST's other outcomes, traditional donor funding from Sida was and continues to be necessary to support most activities under Outcomes 1 and 3. This is due to the advocacy-type nature of activities within these outcome areas.

As discussed in Finding 15, developing partnerships with private sector companies under Outcome 1 has been both time and labour intensive and has required significant resources to engage the private sector in this work. Even though CREST has now established numerous partnerships with the private sector, there remains a continuous need to fund partnership development in order to develop subsequent projects with partners, deepen the relationship to achieve a more strategic level of partnership, and to establish new partnerships with companies that need support. Traditional donor funding is required to engage in partnership development due to limited resources within IOM that cannot financially sustain this work without external donor support. Traditional donor support is also necessary to foster CREST's strategic industry-building work that is housed under Outcome 3 due to the fact that the activities that fall within this outcome are not as easily quantifiable as the direct support provided to private sector companies under Outcome 2.

While CREST's funding is now secured until the end of September 2022, it is currently unclear whether the initiative will continue once the project period ends, and if it does, what kind of funding arrangement would be made. The current mix of traditional donor funding and private sector funding has proven to be successful to support the initiative thus far. The initiative has yet to develop a project sustainability strategy, which is planned result under Outcome 1 and which the evidence and recommendations generated from this evaluation will help to inform.

5.7. GENDER, ENVIRONMENT AND HUMAN RIGHTS

This section provides an assessment of the extent to which the principles of gender equality, human rights, and environmental sustainability have been considered and mainstreamed throughout the CREST initiative.

22. While CREST has made some important investments towards thought-leadership with respect to the complex linkages between migration, business, and climate change to support the resilience of migrants' origin communities, the initiative has yet to clearly define the scope and entry points of its work related to environmental and climate change, including whether and how it would like to mainstream environmental concerns throughout its work. (Responds to EQs 20 and 21)

Under CREST's Outcome 1 area to promote research and thought leadership, CREST engaged with the Stockholm Environment Institute (SEI) to conduct a regional mapping and develop a research design to better understand the international labour migration-environmental change nexus with the objective of increasing the understanding and providing guidance to stakeholders on how to consider and address risk increased by climate change and environmental degradation. The mapping included the identification of potential case studies for further examination of migration patterns; how climate change impacts the decision to migrate as well as the level of vulnerability of migrant workers to unethical practices; as well as examples of good practices of targeted ethical recruitment, resilience building and diaspora engagement. A multi-stakeholder consultation took place on 21 September 2020, gathering 31 participants from academia, UN organizations, business associations, civil society, and research institutes, where the participants expressed high levels of interest in the research, and confirmed that the international labour migration – climate change – private sector nexus constitutes a knowledge gap. Building on initial findings and the consultation, a detailed methodological framework was developed for the second phase of the research, which is currently ongoing²⁶.

In addition, in March 2020, the Philippines' 2018 National Migration Survey (NMS) results were released. Based on the data, CREST partnered with the University of the Philippines Population Institute Demographic Research and Development Foundation to conduct an auxiliary research that aims at 1) understanding the nexus of forced labour and exploitation and migration; 2) identifying factors of unsafe migration; 3) understanding the impact of climate change and gender-dimensions and 4)

developing guidelines for the private sector towards mitigating future labour exploitation.

While CREST is investing in building knowledge around the climate change – labour migration – private sector nexus through the above-mentioned research initiatives, CREST's conceptual framework (including its ToC and logical framework) does not articulate how its current programming priorities are inter-linked with this nexus. In addition, CREST has yet to define the scope or entry points of its work with respect to the inter-linkages of labour migration, private sector behaviour, and climate change, or articulate whether and how it would like to mainstream environmental concerns throughout its work. Without a formal approach, it is difficult for the project to know where to place its efforts. Without a clearly defined scope and articulated entry points to guide its approach to mainstreaming environmental/climate change concerns throughout its work, the initiative risks spreading itself too thin or not having enough focus to achieve meaningful progress. This missing clarity is largely due to the fact that the initiative is still collecting data and evidence with respect to how climate-change affects the vulnerabilities of migrant workers. Once the research with the Stockholm Environment Institute has been conducted, the project will be better placed to engage in this type of planning.

23. The CREST initiative is aligned with international human rights norms and standards. However, it does not have a mechanism in place to engage stakeholders in project design modifications or implementation. While the project is promoting the interconnectedness of the rights of migrant workers, this approach could be further strengthened.
(Responds to EQs 6, 18, 21 and 22)

The CREST initiative is strongly aligned with human rights norms and standards articulated in the UNGPs and the SDGs. It is also well aligned with global business and human rights norms and standards, as outlined in Annex 9 that provides a visual representation of this alignment. The project design also follows a human rights based approach (HRBA) by engaging private sector companies as duty-bearers in the active design of CREST projects and by consulting with migrant workers as rights holders to ensure that their experiences, perspectives, and priorities are captured throughout the CREST approach, as reflected in its labour supply chain mappings and the production of its Migrant Worker Guidelines. This being said, a HRBA also calls for active participation of duty bearers and rights holders in the design and implementation of UN programming through mechanisms such as external advisory committees. So far, the project does not have a formal mechanism in place to engage stakeholders in providing feedback on modifications to the programme design or to help guide its implementation.

The rights of migrant workers are highly inter-connected and include the right to non-discrimination in the workplace, working hours, privacy of workers, health and reproduction rights, and safety and bodily integrity (including sexual harassment in the workplace), among others. The initiative addresses the interconnectedness of the rights of migrant workers through its policy advice to private sector companies as well as through information-sharing activities. This being said, its direct interventions with companies focus largely on promoting the rights of migrant workers in the realm of ethical recruitment, and it is not always possible to explicitly address the interconnectivity of migrant rights through each partnership. In order to pragmatically pursue strategic entry points, the project has had to at times focus more on some rights over others. There therefore remains some room to further advocate among private sector partners the use of a more explicitly interconnected approach to promoting the rights of migrant workers.

24. CREST's Gender Strategy has been useful to help the initiative mainstream gender considerations throughout its work, including through obtaining and reporting on sex-disaggregated data. However, there is still significant room for it to fully implement the strategy. Programming to date has not fully differentiated between sub-groups of vulnerable migrants and its programming has not specifically targeted women or different gender groups.
(Responds to EQs 19 and 21)

In June 2019, CREST published a Gender Strategy to facilitate gender mainstreaming throughout the initiative. This has helped it to collect and report on sex-disaggregated data for nearly all CREST events and activities. However, the project faces the limitation that sex-disaggregated data is not consistently available when supplied by private sector partners due to the fact that many private sector companies do not collect employee data disaggregated by sex. The strategy has also helped the project to integrate gender equality concerns throughout its tools and methodologies. In fact, for *Output 2.1: Gender-sensitive project tools and methodologies are available and responsive to the specific needs of companies, suppliers, recruiters and migrant workers*, CREST has so far surpassed its established target of developing 7 gender-sensitive tools for private sector partners by finalizing 19

tools²⁷. The initiative also conducted four (4) labour supply chain mappings that took into account gender dimensions with companies. The Gender Strategy is strong at making a case for why gender considerations should be integrated throughout private sector activities aimed at increasing alignment with the UNGPs and even includes a Business Case for Gender Equality and Women's Empowerment. The strategy also clearly articulates why the needs of transgender people must be specifically identified and addressed through CREST programming. In addition, it identifies specific ways in which the project should go about integrating gender equality considerations into its programming framework and implementation.

The initiative is currently in the process of implementing this guidance and is at different stages of implementing various elements of the gender strategy. For instance, the strategy specifies that “every private partnership – regardless of the sector – should include a standard training on gender equality that must be attended by both men and women”. While this is an excellent concrete and actionable way of mainstreaming gender, CREST's logical framework does not include a specific indicator to capture data on how many training sessions are covering gender equality concepts. Therefore, it is impossible to know the extent to which this element of the policy is being implemented. Additionally, the Gender Strategy suggests the integration of the Women Empowerment Principles tool developed by UN Women into CREST's tools/resources to initiate dialogue on women's empowerment with private sector partners. However, the integration of this tool is not captured within the project's logical framework and is not reported on in its annual reports. This being said, the initiative is either on track, has met, or has exceeded its targets with respect to those elements of the Gender Strategy that are captured within its logical framework. For instance, for *Indicator 2.A: # action plans by private sector partners to address challenges and opportunities identified, including gender inequality and women's empowerment*, CREST is on track to achieving its target of 10 by already having supported 8 action plans developed by buyers. Another example is how the project has met its target of “1” for *Indicator 3.2.E: # of gender-sensitive IRIS tools available for recruitment agencies*.

As part of CREST's gender-specific work, it created the *Gender Brief on Addressing Women Migrant Worker Vulnerabilities in International Supply Chains* and *Gender info sheet* to improve business understanding on the gender dimensions of labour exploitation in the context of labour migration into international business supply chains. The brief and info sheet identify gender-specific risks and vulnerabilities that women migrant workers face during their migration journey and recommend concrete actions for businesses to prevent gender-based inequalities from occurring in their workplaces. The publications are available on the CREST website and were published through its newsletter, reaching more than 500 recipients²⁸. The project also produced the document *Addressing Women Worker Vulnerabilities in International Supply Chains* in September 2020. Although this is outside of the scope of this evaluation, it is an important contribution towards promoting the rights of women migrant workers.

While CREST has made important advancements to mainstream gender equality throughout its tools and methodologies as suggested in its Gender Strategy, its focus has been primarily on raising awareness of women migrant worker vulnerabilities and has not yet actively engaged in providing concrete advice and mechanisms to effectively address the unique challenges facing women migrant workers, including approaches to support the empowerment of women migrant workers in a concrete and meaningful way. For instance, one of the priority areas of its forthcoming Ethical Recruitment Roadmap is to “empower migrant workers to enjoy greater access to gender-sensitive information, rights-based knowledge, worker associations, and effective remedy”. However, as mentioned in Finding 6, CREST's approach with respect to how it will support the engagement and empowerment of migrant workers (including women migrant workers) is somewhat unclear. In CREST's *Covid-19: Guidance for labour recruiters to enhance migrant worker protection during the current health crisis*, the guidance mentions on page 2 that “labour recruiters must exercise their duty of care to respect human rights and meet the basic needs of migrant workers, especially women workers and disadvantaged groups” but does not provide concrete actionable recommendations on how to do this. On page 6 of the same document, it mentions that “labour recruiters should give additional consideration to (domestic workers), particularly women, and adopt enhanced protection measures to guarantee their safety” without outlining what these measures should entail. The initiative also focuses primarily on industries where men make up the majority of migrant workers. Some of those industries where women make up the majority of migrant workers (such as agriculture, garment manufacturing, and electronics in some countries and supply chains) have received comparatively less attention through the initiative to date.

The Gender Strategy specifies that “there is limited guidance available on how business actors can address the gendered dimensions of human rights abuses in their operations particularly in the context of migration” and that “to address this gap, the UN Working Group on Business and Human Rights is currently working on developing guidelines on how to implement the UN Guiding Principles using a gender lens that will be available from June 2019”. The Strategy specifies that the CREST project “should monitor this space as this guidance will be useful for the project’s implementation”. However, CREST’s Gender Strategy has not been updated to reflect these new guidelines. Although the CREST Gender Strategy identifies transgender migrants as a particularly vulnerable sub-group²⁹, the strategy does not articulate how CREST should support their specific needs and CREST’s logical framework does not include any indicators to capture progress in this area. In fact, other sub-groups of vulnerable migrant workers (such as workers with diverse sexual orientation, migrants from stigmatized ethnicities or religious groups, etc.) are rarely identified within CREST’s documents, tools, and methodologies and it is unclear how CREST is taking their needs and priorities into consideration. Sub-groups of vulnerable migrants do not all share the same experiences or priorities and require programming that can be adapted and modified to their specific realities. This kind of disaggregated programming is in line with the UNGPs that call for the use of a comprehensive human rights and equity approach.

The Nordic Consulting Group Consortium published in October 2020 a “Review of Mainstreaming of Gender Equality and HRBA in Sweden’s development cooperation in Asia and the Pacific region 2016 – 2021” which identified that the CREST initiative has managed to integrate gender equality considerations to a higher extent than many other Sida-funded projects. However, it also highlighted that there is no dedicated gender expert as part of the CREST programming team. This may be a limitation facing the CREST team and may warrant closer collaboration with other migration-specific projects in the region that specialize in women’s rights such as the ILO – UN Women Safe and Fair Programme that could provide additional specialized technical support with respect to designing and integrating gender responsive programming that goes beyond basic mainstreaming. Gender-specific programming is another area where CREST could also look internally towards IOM to acknowledge where IOM has ongoing work that is complementary to CREST. For example, staff members at the Hong Kong Sar, China office who work with the CREST regional team are also responsible for sister programming that is entirely focused on promoting the rights of women migrant domestic workers and engaging with diverse stakeholders to build capacity for ethical recruitment mindful of the unique needs of women migrant domestic workers.

Lessons learned are insights that contribute to institutional knowledge and that can be applied to similar initiatives in other contexts. This evaluation has identified the following lessons learned derived from the evaluation findings that inform both migration and private sector engagement work.

- 1. Engaging with companies that have not yet formally endorsed UNGP principles can potentially generate meaningful results by supporting those companies that are least aware of human rights risks and whose behaviour change in turn may have the greatest impact on migrant workers. However, engaging with companies that are early in their human rights journey can also create inefficiencies, as they often require lengthy problem awareness raising and partnership engagement processes, which sometimes do not result in an established partnership. Some degree of demonstrated commitment by companies towards the UNGP principles, including prioritization of UNGP alignment throughout the company structure and hierarchies, is necessary to mitigate the risk of these potential inefficiencies. (Derived from finding 14).*
- 2. The CREST initiative's practical approach and direct engagement with private sector companies across migration corridors through customized tools and resources, labour supply chain mappings, and tailored trainings has helped to advance partnerships with private sector companies and other key stakeholders as well as the overall migration, business, and human rights agenda, and has generated important tangible learnings that have been shared across IOM. These learnings have been shared through staff meetings, newsletters, etc., and have helped to inform IOM's new Private Sector Partnership Strategy developed in 2020. They have informed elements of private sector partnership outreach, co-development of tools with the private sector, and how to improve IOM's responsiveness and timeliness when working with private sector companies, among others. They have also been particularly useful and applicable to programming where the private sector is an active partner and/or recipient of direct support as opposed to traditional fundraising and resource mobilization efforts where the private sector is viewed exclusively as a donor. (Derived from finding 4).*
- 3. Some of the conditions outlined within NDAs do not promote private sector companies to be transparent and to self-report on their efforts to align with business and human rights principles, as is required under the UNGPs. This can hinder transparency and accountability, limit information sharing that includes results, and reduce the ability to generate momentum across companies. Both IOM and most private sector companies require the establishment of NDAs to protect themselves from reputational risk, including "blue washing". However, some of the limitations caused by them can be reduced by negotiating certain terms such as the inclusion of basic elements of transparency (i.e. the name of the company and the results achieved through the partnership) or by lifting NDAs over time (Derived from finding 17).*
- 4. Under the CREST model, private sector companies are partners who play a multi-faceted role as clients, strategic partners, and funders. As such, they are a unique group of actors that present complex challenges with respect to their engagement. Serving multiple roles as both clients and funders, they face conflicting interests to both meet standards and push the work forward (the role typically played by traditional donors) while still trying to generate profit and protect their economic and reputational interests. The conflicting role of being both the client and funder also presents some challenges with respect to accountability as it can be challenging to hold oneself accountable. This has sometimes placed the CREST initiative in a difficult position, with its aim to establish partnerships with private sector companies and navigate these complex interests. The classic IOM partnership framework used to engage traditional donors is designed for funders that are not playing these dual roles, and therefore does not fully support the framework needed to forge these complex partnerships. (Derived from findings 1, 14, 15, and 16).*
- 5. CREST has successfully navigated through a complex fundraising environment for its human rights in business work among traditional donors and private sector partners. Even though traditional donors typically resist funding the private sector to meet the UNGPs since they do not want to risk the possibility of subsidizing the private sector, traditional donor funding is still necessary to bring partners and the UN together to drive the business and human rights agenda. CREST has successfully demonstrated that a hybrid funding model can successfully leverage both traditional donor and private sector funding by allocating traditional donor funding exclusively towards those elements of the project that do not contribute to direct support to the private sector, while ensuring that private*

sector funding covers all costs for interventions within company supply chains and increasingly sector and industry-wide collaborative approaches and policy dialogue. (Derived from finding 15).

- 6. Some of CREST's private sector partners are champions for collaborative whole-of-industry approaches to meet the UNGPs and to promote the rights of migrant workers, and are willing to fund activities that contribute towards these strategic endeavors. It is crucial for projects like CREST to engage these industry-wide champions in order to advance strategic work around industry-wide collaboration, momentum building, knowledge exchange, etc. At the same time, many private sector companies are not interested in funding strategic work (such as thought-leadership or industry-wide collaboration) that goes beyond activities that directly benefit their own operations and business partners and migrant workers in their supply chains. Even so, their funding structure is much more flexible than that of traditional donors. Private sector companies are interested in paying per deliverable and are typically not interested in the funding breakdown of each deliverable or the project's administrative and staffing costs. This means that there is potential for costs that are not directly associated with the deliverable to be factored in as a type of overhead cost (this could include a percentage that goes towards future partnership development costs, thought-leadership, etc.). It is standard practice in the private sector that company costs (including strategic costs) be factored into the overall cost of each deliverable. (Derived from finding 15).*
- 7. CREST has found that the most effective method of identifying potential new private sector partners has been through word of mouth and business referrals. However, establishing new partnerships with the private sector can be very resource intensive and can even put the financial sustainability of the project at risk if the time and resources required to establish a new partnership do not justify the benefits. The partnership development process can be shortened and made more efficient by being clear and direct with private companies to understand the level of financial investment they are willing to provide towards the partnership as well to explain both the advantages and administrative requirements of working with a UN agency right from the beginning of any partnership discussions in order to set realistic expectations (as opposed to a less direct approach that is typically used with traditional UN donors). It is also crucial to be willing to make a decision relatively early in the partnership development process to not move forward with a partnership that does not seem promising (Derived from findings 14 and 16).*

The evaluation presents six conclusions based on the analysis of the findings. The conclusions highlight the most important elements for consideration emerging from the evaluation and present a forward-looking discussion around the implications of the findings on the future of the CREST initiative as well as wider private sector engagement to promote alignment with the UNGPs and respect for the rights of migrant workers.

Conclusion 1: Focus and strategic placement within the larger migrant worker protection context

(Derived from findings 1, 2, 5, 6, 7, 10, 11, 18, 22, and 24).

The CREST initiative has achieved important early project-level success in supporting private sector partners to commit to the UNGPs, which is resulting in an expansion of its work both geographically and thematically as it attempts to respond to increasing demand and interest. However, the initiative has yet to fully and clearly define its scope of work, including what areas it will and will not directly influence. For instance, CREST has yet to define the scope or entry points of its work with respect to the inter-linkages of labour migration, private sector behaviour, and climate change, or articulate whether and how it would like to mainstream other kinds of environmental concerns throughout its work. The initiative has also yet to fully implement its Gender Strategy and define the scope of its gender equality work. Without clear project parameters in place, CREST risks spreading itself too thin by trying to touch upon a multitude of entry points without having the capacity to effect meaningful change. Although its approach is largely more targeted than that of other UN actors working on similar issues in the region that use a broader approach to programming, the project requires more defined parameters to ensure that CREST's work is targeted and meaningfully contributes towards impact-level results in those areas where it chooses to engage.

Conclusion 2: Capitalizing on CREST's privileged entry points with the private sector to advance UN programming and contribute towards its multi-stakeholder Theory of Change

(Derived from findings 1, 2, 5, 6, 12 and 18).

The establishment of 19 successful partnerships so early in the initiative presents a tremendous opportunity for CREST to focus on the development of the strategic nature of these partnerships during the second half of the project. To advance strategic-level work, some of CREST's private sector partners require additional support and technical advice that are aligned with the comparative strengths of other initiatives within the IOM and among other UN entities working in the region, such as labour law support to manage remediation systems, support to directly engage and empower migrant workers, opportunities to engage with national governments in direct dialogue over migration legislation, among others. In order to respond to these company needs and yet avoid duplication with other UN initiatives, there is an opportunity for CREST to use its "hook" with the private sector and serve as a bridge between the private sector and UN initiatives working in these areas. The fact that CREST currently has limited formal partnerships with other UN agencies working on ethical recruitment and migrant worker rights within the region is hindering the initiative's ability to serve as a bridge and capitalize on its privileged entry point with the private sector. Capitalizing on the work being done by other UN agencies in the region and serving as a bridge to connect its private sector partners to this work could further facilitate contributions towards its multi-stakeholder ToC outcomes while still keeping a concentrated focus on the areas of work that it does best. Partnerships with other UN agencies could also serve as opportunities for CREST to further share its expertise and practical experience with other migration programming.

Conclusion 3: Ensuring a sustainable funding model that supports strategic-level work

(Derived from findings 9, 15 and 21).

The mid-point of a project is the ideal time to start thinking about how to ensure its long-term sustainability. Due to the initiative's success to date, there are high chances that stakeholders will want to see the project continue through subsequent phases. However, the fact that CREST's traditional donor support comes primarily from one donor (Sida) presents risks to the initiative due to limited donor diversity. Moving forward, it may be prudent to diversify the range of donors that could include additional government-based donors and private sector foundations. CREST's innovative funding model may also be able to provide additional flexibility such as by integrating strategic work as overhead costs into the price of direct deliverables to private sector companies. By having already surpassed its partnership engagement target at only half way through the project, CREST is in a privileged position where it can focus during the second half of the initiative on securing sustainable funding to ensure a subsequent project phase.

Conclusion 4: Direct engagement with migrant workers

(Derived from findings 6 and 23).

CREST has engaged migrant workers as informants to ensure that their views, experiences, and priorities are integrated into the project approach and tools used to support private sector partners, thus reflecting a migrant-centered approach. However, the initiative does not have a formal mechanism, such as an External Advisory Board, set up where migrant workers or groups that represent them can influence decisions related to project design modifications and implementation. In addition, while all of CREST's products and services are designed to promote the rights of migrant workers, the initiative has limited programming targeted at directly empowering migrant workers. A HRBA and the UNGPs call for initiatives to empower rights holders and include them in decisions that affect them. CREST is in a privileged position where it has the ear of its private sector partners and has the potential to influence company behaviour to encourage the empowerment of migrant workers by facilitating social dialogue and collective bargaining without fear of retaliation and/or dismissal. The new partnership with the MFA is strategic in nature and presents opportunities for the project to better engage with grassroots migrant worker organisations across the region where CREST operates.

Conclusion 5: The effect of NDAs on supporting companies to achieve reporting requirements as outlined in the UNGPs as well as the effect on project timeliness, transparency, and information sharing

(Derived from findings 17 and 18).

Confidentiality clauses within NDAs have sometimes negatively affected the extent to which CREST's private sector partners report on results, which has hindered CREST's ability to disclose its partnerships and share information on results with UN entities and other actors working on the protection of migrant workers. However, NDAs can be negotiated and have even been lifted over time, thus reflecting the importance of the negotiation process. As a relatively new initiative, CREST does not have standard NDAs to draw on or minimum standards in place to guide the negotiation of NDAs. Due to the initiative's early success in establishing private sector partnerships, there may now be room during the second half of the project to focus more on sharing information and requiring that newly formed partnerships meet a minimum standard of transparency and information sharing. Further strengthening results reporting and information sharing will be particularly pertinent as time passes and the contributions of CREST's activities towards higher-level results become more visible.

Conclusion 6: Efficiency and sustainability of private sector partnership development

(Derived from findings 14 and 16).

Even though CREST has been highly successful at establishing partnerships with private sector companies, in many cases the partnership development process has been lengthy and resource heavy. Although partnership development inherently consists of a certain degree of risk, if CREST invests time and effort into partnerships that don't materialize or that are not commensurate with the investment made in partnership development, both the efficiency and sustainability of the initiative are put at risk. Prioritizing partnerships with champions and strategic private sector partners could potentially mitigate this risk but may also reduce the initiative's ability to work with those companies who are less advanced with respect to meeting the UNGPs and where the greatest impact of CREST's work could potentially be felt. CREST currently does not have clear guidance on how to efficiently engage in partnership development and does not have clear criteria to guide decisions around when the pursuit of a new partnership should be dropped due to the unlikelihood that the partnership will be fruitful and worth the investment.

The following five recommendations are designed to strengthen the CREST initiative and improve its future work. Each one includes an overall strategic recommendation followed by operational recommendations. They are presented in order of priority.

Recommendation #1: Further define CREST's scope and project parameters to ensure quality programming and facilitate the achievement of impact-level results.

- Aligned with conclusions 1 and 4
- Recommended timeline: June 2021 – October 2021
- High urgency, low difficulty, high impact
- Directed to CREST's management team

Rationale: CREST requires more clearly defined project parameters in order to ensure its strategic focus and its contribution towards higher-level results.

To operationalize this recommendation:

- Develop a CREST-specific Theory of Change that concretely outlines how CREST's project-specific work with the private sector will contribute and plug into its wider Multi-Stakeholder Theory of Change. The project-specific ToC could be developed through a workshop with the programming team and would not need to be as complex as the multi-stakeholder ToC since it will be an add-on to the existing multi-stakeholder ToC.
- Define the scope and parameters of CREST's thematic work, including work on environment/climate change; direct engagement and empowerment of migrant workers; programming for women migrant workers; selection of target sectors, etc.
- Build-in monitoring and follow-up mechanisms within partnerships as a requirement for partnership engagement, and identify more specific impact-level indicators in the logical framework that are aligned with those of other organisations such as Know the Chain, IHRB, and CHR. To assess impact-level results, the initiative should conduct a final evaluation, which could potentially include an impact assessment, that captures the direct voices of migrant workers and other relevant stakeholder groups to understand how more responsible business conduct achieved through CREST support impacts the experiences of migrant workers.

Recommendation #2: In the second half of the initiative, focus on strategic level work that includes linking private sector partners to other UN entities and strategic actors, fostering an industry-wide approach, continuing to develop strategic partnerships, and widely sharing knowledge and best practices.

- Aligned with conclusions 1 and 2
- Recommended timeline: June 2021 – September 2022
- High urgency, medium difficulty, high impact
- Directed to CREST's management team

Rationale: Now that CREST has surpassed its goal of establishing private sector partners and has nearly met its private sector funding target, it has the opportunity to further capitalize on its comparative strengths and its privileged connection to private sector companies throughout the second half of the initiative by focusing more on strategic level work.

To operationalize this recommendation:

- Conduct a mapping of UN agencies in the region and the specific technical support and programming that they offer with respect to the protection of migrant workers, and then analyze how these entities could support the needs of CREST's private sector companies with respect to remediation, government dialogue, support to women migrant workers, etc.
- Establish an External Project Advisory Board or Committee consisting of key project stakeholders and UN agencies working on migrant worker protection in the region to help guide CREST's strategic approach and facilitate referral mechanisms to link its private sector partners with UN agencies (including other parts of IOM) to address their needs

and contribute towards the wider multi-stakeholder ToC without causing duplication. This should include working with other parts of the IOM to facilitate engagement with policymakers. This mechanism would be useful for not only the remainder of the current CREST initiative but also to facilitate potential future phases of the project. While this mechanism is being set up, CREST should engage with key project stakeholders and UN agencies informally to obtain their insights and identify areas and ways in which private sector companies could be referred.

- Develop partnership agreements with relevant UN entities across the region to support formal “referral mechanisms” that can facilitate the referral of CREST’s private sector partners to those UN entities to provide continued support in those areas where CREST does not specialize, and vice versa. These partnership agreements could also help to facilitate increased cooperation and collaboration among UN entities regarding migration work.
- Formalize strategic partnerships between CREST and UN entities working on labour migration and/or business and human rights such as UNDP, ILO, and UN Women in order to leverage each entity’s technical expertise.
- Increase CREST’s collaboration with industry-wide coalitions, continue to work with strategic and institutional partners to promote industry-wide collaboration, and place a stronger focus on encouraging current private sector partners to share information and engage with these coalitions.
- Continue to establish projects that can support more than one company at once. This may require negotiating NDAs that allow for some information sharing in order to bring companies together through multi-company projects and to encourage a snowball effect.
- Continue to share information, best practices, and resource materials online with the aim of increasing the project’s thought-leadership across industries as well as promoting the initiative with the aim of securing financial support for a project extension or subsequent phase.

Recommendation #3: Strengthen CREST’s direct engagement with and empowerment of migrant workers through initiatives with partners as well as the engagement of migrant worker organisations in project design modifications and implementation.

- Aligned with conclusions 1 and 4
- Recommended timeline: June 2021 – September 2022
- High urgency, high difficulty, high impact
- Directed to CREST’s management team

Rationale: Increased empowerment of and direct engagement with migrant workers will be necessary during the second half of the CREST initiative since a HRBA calls for the strong engagement and empowerment of rights holders to participate in both design updates and the implementation of UN programming initiatives that directly affect them.

To operationalize this recommendation:

- Represent the interests of migrant workers of all genders in the project design and implementation by engaging the MFA in the design of CREST’s project-specific ToC and include the MFA as a member of an External Advisory Board.
- Draw on the MFA’s and IOM’s extensive network of grassroots migrant worker organisations, ensuring that all key sub-groups of migrant workers are included, to establish direct partnerships with migrant worker CSOs at the community level.
- Establish a formal partnership with the ILO to encourage social dialogue and collective bargaining without fear of retaliation and/or dismissal through safe spaces where migrants can exchange views and speak with one voice to promote dialogue with their employers (this could be through unions or other similar initiatives depending on the country context). This would help to facilitate CREST’s remediation work.
- Negotiate into private sector partnerships project elements that facilitate direct dialogue between companies and migrant workers as well as support to empower migrant workers to demand their rights.
- Partner with UN Women and/or IWRAP to fully implement CREST’s Gender Strategy and to define its scope with respect to directly supporting the needs of women migrant workers through targeted programming and/or referrals to specialized agencies that can provide this support.
- Update the CREST Gender Strategy to include a stronger gender equality lens to provide more concrete guidance on how to support and engage particularly vulnerable groups of migrants that could include migrants with diverse sexual

orientation, gender identity, gender expression and sex characteristics; migrants from communities facing ethnic or religious stigmas; etc.

Recommendation #4: Establish CREST-specific guidelines to facilitate more efficient and sustainable partnership development processes.

- Aligned with conclusions 5 and 6
- Recommended timeline: June 2021 – September 2022
- High urgency, medium difficulty, high impact
- Directed to CREST's management team

Rationale: Even though CREST has surpassed its target for establishing private sector company partnerships, the partnership development process is very long and resource heavy and sometimes does not lead to the establishment of a partnership, which reduces the project's efficiency and threatens its sustainability. Efforts need to be made by CREST's management team to speed up the project set-up period, negotiate NDAs that are more beneficial to CREST, and reduce the risk of not securing a meaningful partnership after lengthy negotiations.

To operationalize this recommendation:

- Establish CREST internal partnership development criteria that clearly states when the development of a partnership should be cut off based on a cost/benefit analysis.
- Develop CREST internal guidance for private sector partnership development that promotes direct communication and transparency with private sector partners from the beginning of partner negotiations in order to set realistic expectations and better gauge the seriousness and feasibility of the potential partnership.
- Develop a minimum standard of information that must be publicly shareable when negotiating NDAs (this should ideally include at a minimum the ability of CREST to publicly identify partners by name and share the results achieved through the partnership).
- Include clauses in private sector partner contracts that require partners to report on outcome and impact-level results indicators.
- Work with IOM 's Legal Department to develop a CREST-specific standardized NDA and IOM strategic framework agreement template versus a project-focused template to speed up the project set-up phase.

Recommendation #5: Develop a sustainable funding strategy to ensure the sustainability of the CREST Initiative once the project ends in September 2022.

- Aligned with conclusion 3
- Recommended timeline: June 2021 – September 2022
- Medium urgency, medium difficulty, high impact
- Directed to CREST's management team

Rationale: The CREST initiative is filling an important gap with respect to supporting private sector companies to meet the UNGPs, and has demonstrated impressive success to date. This likely means that a project extension or subsequent phase will be justified as long as it is able to ensure sustainable funding. With less than two years left before the end of the current project, now is the time for CREST to start securing funding for a potential second phase.

To operationalize this recommendation:

- Use the second half of the programme to focus on reporting on results and sharing information in order to gain more visibility among potential traditional donors, private sector foundations, and private sector companies. This should be done by: 1) establishing more impact-level indicators within CREST's results framework that can logically establish a linkage between CREST's activities and changes in the lives of migrant workers; 2) sharing what information is publicly available through CREST's website; 3) approaching potential donors to introduce CREST's comparative strengths and its achieved results and future strategic vision.
- Develop a sustainable funding strategy that draws on CREST's successful mixed funding model. The strategy should:
 - 1) Diversify CREST's traditional donor base and/or secure multi-year funding from Sida;
 - 2) Document CREST's strategic vision with respect to its whole-of industry approach as a tool to generate more funding from private sector institutions;
 - 3) Integrate strategic overhead costs into deliverables paid for by private sector companies under Outcome 2.

