



IOM International Organization for Migration
OIM Organisation Internationale pour les Migrations
OIM Organización Internacional para las Migraciones

INTERNATIONAL ORGANIZATION FOR MIGRATION'S

INTERNAL *EX ANTE* EVALUATION

OF

**COMBATING TRAFFICKING IN PERSONS IN AFGHANISTAN
*PREVENTION AND PROSECUTION***

S – GTIP – 08 – GF – 0033

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1. Executive Summary

During the final weeks of 2008, IOM conducted an internal Ex Ante Evaluation of the United States Department of State – Office to Monitor and Combat Trafficking in Persons (G/TIP) funded program, *Combating Trafficking in Persons in Afghanistan – Prevention and Prosecution*.

The overall objective of this evaluation is to “optimize the allocation of budgetary resources under [the] operational activities and improve overall programming quality.”¹ Further, the evaluation is intended to primarily investigate the logical framework attributable to the implementation of programming and whether, based upon this analysis, the objectives can be attained.

Taking into consideration the difficulties associated with the type of programming being implemented under extremely insecure conditions, all staff members associated with this effort need to be commended. Though internally-driven, at no time did the evaluator sense reluctance by team members during this undertaking, as is often the case. The personal dedication and investment of those interviewed towards promoting the program’s success is visibly evident.

Based on an extensive desk study of all available documentation, field visit, and interview of key program personnel, the following overarching analysis and recommendations can be observed:

1. Program Design - Though the program is well intentioned as designed it does not sufficiently outline a coherent strategic vision or logical programmatic framework and should be redesigned to better sequence strategies with objectives, activities, and projected outputs.
2. Program Effectiveness – Based upon a thorough evaluation of intended outputs and projected costs, it is recommended that program management look to reprioritize forecasted activities in order to focus more intently on maximizing gains. At present, it appears as though the program is attempting to achieve too much with too few resources and risks making significant impacts across the spectrum of proposed interventions.
3. Program Efficiency – While the program maximizes the number of activities under budgetary constraints, it does so at its own peril (see #2 above). Moreover, some specific activities could be downsized (re: Study Tour) in order to strengthen efforts elsewhere within the program.
4. Program Sustainability – As is presented, the program does not lead directly to sustainable outputs as no formal linkages with government counterparts are provided and no planning as it relates to the sustainability of NGO partners is suggested.

¹ Taken from Project Proposal document

2. Table of Contents

1. EXECUTIVE SUMMARY	2
2. TABLE OF CONTENTS	3
3. LIST OF ACRONYMS	4
4. INTRODUCTION AND BACKGROUND	5
5. METHODOLOGY	6
5.1. EVALUATION OBJECTIVES	6
5.2. EVALUATION DESIGN	6
5.3. METHODS OF DATA COLLECTION	7
6. LIMITATIONS AND ACKNOWLEDGEMENTS	7
7. FINDINGS	8
7.1 PROGRAM STRATEGY/OVERARCHING OBJECTIVE	8
7.2 PROJECT PURPOSE(S) AND ACTIVITIES	10
7.2.1 PROJECT PURPOSE 1 : BUILDING CAPACITY OF GOVERNMENT AGENCIES	11
7.2.2 PROJECT PURPOSE CORRESPONDING ACTIVITY 1 – LAW ENFORCEMENT AGENCY(IES) TRAINING	13
7.2.2.1 ACTIVITY 1 - EFFICIENCY	13
7.2.2.2 ACTIVITY 1 – EFFECTIVENESS AND SUSTAINABILITY	16
7.2.3 PROJECT PURPOSE CORRESPONDING ACTIVITY 2 – STUDY TOUR	
7.2.3.1 ACTIVITY 2 – EFFICIENCY	20
7.2.3.2 ACTIVITY 2 – EFFECTIVENESS AND SUSTAINABILITY	20
7.2.4 PROJECT PURPOSE 2: BUILDING CAPACITY OF LOCAL NGOS	20
7.2.5 CORRESPONDING ACTIVITY 1 - ASSESSMENT AND ACTIVITY 2 - TRAINING	21
7.2.5.1 ACTIVITY 1– EFFICIENCY	25
7.2.5.2 ACTIVITY 1– EFFECTIVENESS AND SUSTAINABILITY	26
8. CONCLUSIONS	26

3. List of Acronyms

CID	Criminal Investigative Division
CT	Counter Trafficking
GoA	Government of Afghanistan
G/TIP	Office to Monitor and Combat Trafficking in Persons
IOM	International Organization for Migration
Moi	Ministry of Interior
MoJ	Ministry of Justice
NGO	Non-Governmental Organization
NY(C)	New York (City)
TiP	Trafficking in Persons
ToR	Terms of Reference
ToT	Training of Trainers
US(G)	United States (Government)

4. Introduction and Background

From the Project Document:

Trafficking in persons is a significant problem in Afghanistan. Generally, the flow of cross-border trafficking is from Afghanistan to Iran and Pakistan, as well as other neighboring countries. Internal trafficking in Afghanistan is generally in the form of forced marriages and domestic servitude exposing victims to various forms of abuse including, but not limited to, sexual and labour exploitation. IOM records have also shown that young women in their teens and early 20s, as well as children, are more vulnerable. Some of the main reasons why trafficking in young women and particularly children is a prevalent problem in Afghanistan is lack of awareness and information on the risks of trafficking, lack of protection schemes for victims of trafficking in Afghanistan and countries of destination, and lack of prosecution of traffickers.

There is also the problem of weak government capacity to formulate legislative instruments as well as the non-enforcement of existing legal frameworks, which seem to leave an open field for traffickers to operate fairly freely. The 2005 Trafficking in Persons Report of the US Department of State placed Afghanistan under the Tier 2 category, due to the fact that victim protection is well below satisfactory levels, and the failure of the Afghan Government to obtain a noticeable number of convictions in trafficking-related cases. It is therefore imperative to enhance the capacity of the relevant Afghan Government authorities, local NGOs and civil society to strengthen the policy, legislative and infrastructural instruments for the prevention of child trafficking, protection of child victims, as well as, prosecution of child traffickers.

Despite recent positive efforts of the GoA, little has been achieved in the development of anti-trafficking legislation. Currently Afghan law lacks provisions which specifically criminalize trafficking in persons and law enforcement officers are neither trained nor confident in investigating trafficking cases. The situation is exacerbated by the lack of NGOs addressing trafficking issues and the low level of awareness among mass media and their coverage of the issues.

In recognition and in appreciation of the need to address the identified problems of human trafficking in Afghanistan, the Ministry of Interior Affairs of the Islamic Republic of Afghanistan has made an official request to IOM to provide technical support in the establishment of effective counter-trafficking mechanisms. The government's request to IOM includes institutional capacity enhancement, strengthening the human resource base to combat trafficking, and enhancing the capacity of the government to enact legislative instruments to prosecute and punish traffickers.

5. Methodology

5.1. Evaluation Objectives

The objective of the evaluation is to, “optimize the allocation of budgetary resources under [the] operational activities and improve overall programming quality.”² As the evaluation in question is an *ex ante*, the depth and scope of materials to be vetted is particularly limited. Therefore, the evaluation is intended to primarily investigate the logical framework attributable to the implementation of programming and whether, based upon this analysis, the objectives can be attained.

The evaluation examines the project selection, project objectives, indicators, milestones and outputs (intended) as well as other relevant information to best determine whether amendments to the original proposal are necessary. In particular, the evaluation will:

- Examine whether the project approach and objectives are relevant in terms of strategy;
- Examine whether the activities to be undertaken are in relation to the challenges and needs of the region/sector;
- Examine the effectiveness of the project insofar as there are clear objectives and expectations for the program that can be realistically achieved within the constraints of the budget and the reality on the ground;
- Determine whether the program’s activities or complementary outputs are sustainable and whether they will have a significant impact (as it relates to broader CT recognition);
- Investigate whether the proposed timeframe and budget are sufficient in relation to the proposed activities;
- Assess the quality of the inputs to be provided (technical support, project management, operational arrangements (IOM/GoA/NGOs, etc), activities undertaken, and expected outputs produced; and
- Make recommendations on the overall project design, rationale and implementation tools, including monitoring and performance indicators.

5.2. Evaluation Design

As statistical sampling of beneficiaries was not an intention of this evaluation nor was it required to formulate questionnaires, the evaluation explored the logical connectivity of the program’s components based upon both standard and “CT-centric” program frameworks.

Regarding framework references that incorporate counter-trafficking objectives, the evaluator extensively referred to the *IOM Handbook on Performance Indicators for Counter-Trafficking Projects* during all phases of the evaluation. In citing the aforementioned handbook, it becomes imperative to refer to the logical framework within the document while conducting this evaluation. The evaluation therefore walks through each component of the project document using the IOM developed intellectual works as the preferred internal guide for counter-trafficking project development and corresponding activities.

² Taken from the project document

5.3. *Methods of Data Collection*

Data was obtained primarily from IOM personnel in Afghanistan and Geneva though additional sources were identified from research electronically. An in-depth review of all project related documentation was conducted in addition to similarly funded activities that preceded the project being evaluated at present.

The evaluator also consulted with IOM personnel not directly associated with the mission in Afghanistan, though well-versed and able to provide expert opinion in relation to counter-trafficking project development and implementation.

6. Limitations and Acknowledgements

Though the timeframe in-country was sufficient the relatively insecure environment throughout much of the country prevented travel to discuss the needs of potential beneficiaries. Moreover, as detailed training agendas have yet to be developed for the program it appears that trainee selection within the Afghan civil service ranks has yet to be conducted. The crux of the analysis is qualitative in nature and rests largely upon the direct feedback obtained from the IOM Program Manager and existing documentation. It is also important to stress that while the evaluator had the benefit of referencing the IOM *Handbook* throughout the evaluation process, it was not available for use at the time of this project's development and subsequent approval.

The evaluator wishes to graciously give thanks to Ms. Nigina Mamadova, Program Manager, and her team for assisting all efforts related to the desk study and subsequent visitation to Afghanistan. All aspects of the field study were timely and carried out at the highest levels of professionalism. Under such a difficult operational environment, the dedication of Ms. Mamadova and her team was refreshing.

7. Findings³

7.1 Program Strategy/Overarching Objective

The Project will combat trafficking in persons through the capacity building of law enforcement officials in the prosecution of trafficking in person cases as well as local NGOs through counter-trafficking information dissemination among the Afghan population. The Project will compliment other IOM counter trafficking activity in Afghanistan.

The excerpt above was extracted from the final project document submitted and approved by the donor. Based upon the IOM recognized (and commonly accepted) definition of the *Overall Objective*⁴ within the logical framework, the strategy is most commonly synthesized via a single statement on the broader aim of the project being developed. *Strategy* or *overarching objective* statements also tend to be more abstract than definitive in their assertions. As no one project is able to address all of the mitigating factors within a sector planned for intervention, it is generally more acceptable to suggest how the proposed activities will contribute or support the larger desired outcome.

It is neither imperative that these guidelines be observed nor is it detrimental to carrying out the intended activities of the project, however; in an effort to institutionalize (and standardize) developed guidelines the strategic statement does not adhere to the recommended principle. In this case, the statement is overly informative and reaches down into more of the core components of the project as will be highlighted below.

Semantics aside, the strategy claims that the program, “will combat trafficking in persons” (direct intervention) when in actuality it will only do so through the capacity building of enforcement officials and NGO’s (indirect intervention). Though it is unlikely that a reviewer would misinterpret the statement, clarity of vision is imperative in the development of such complex programming.

A larger and more pressing concern in relation to the stated project strategy is that it incorporates project purposes and even touches upon suggested activities. Without attempting to delve too deep into the remaining components to be evaluated, it is crucial for the project’s success to revisit the passage critically. The strategic statement proposes two very different sets of interventions; 1) Institutional Development at the governmental levels; and 2) Civil Society programming to target National NGOs.

Managerially, this should raise concerns insofar as they relate to the current capacity of the program unit, forecasted activities, proposed budget, realistic achievements (forecasted), and perhaps most importantly, administrative and financial oversight. This is not to suggest that the current programmatic team does not possess the intellectual or physical capacity to

³ Though there is a set of activities that intends to provide baseline computer literacy training to select government staff, the evaluation does not delve into its merits. The evaluation views this as more of complementary side activity to those which are contingent upon the program’s overarching strategic vision.

⁴ *Handbook – On Performance Indicators for Counter-trafficking Projects*, International Organization for Migration, 2008. Pg. 15.

undertake these two sets of programming; however, the two diverse sets of objectives (governmental capacity building and NGO capacity building) require varying skill sets and approaches. Moreover, the intertwining of these programming objectives lays the groundwork for what could be significant administrative and/or financial burdens once programmatic hurdles (e.g. security) and reporting requirements present themselves. This all suggests that the project’s overall effectiveness is not as impactful as it could be. Though the program’s intentions are laudable, the program is attempting to accomplish too much with too little time or budget; the overall project is diluted or “watered down” as a result.

From the baseline principle of striving to have the largest positive impact (do no harm), combining two distinct sets of activities into one stream of programming (as has been done) could inadvertently allow management and junior officers to give more credence to either one of those. Therefore, while both proposed sets of interventions are relevant in terms of enhancing efforts to decrease trafficking in Afghanistan the inherent approach of each is contradictory. Though the overarching statement is relevant to the extenuating circumstances surrounding trafficking in persons (TIP) in Afghanistan, a revisit of the passage is suggested.

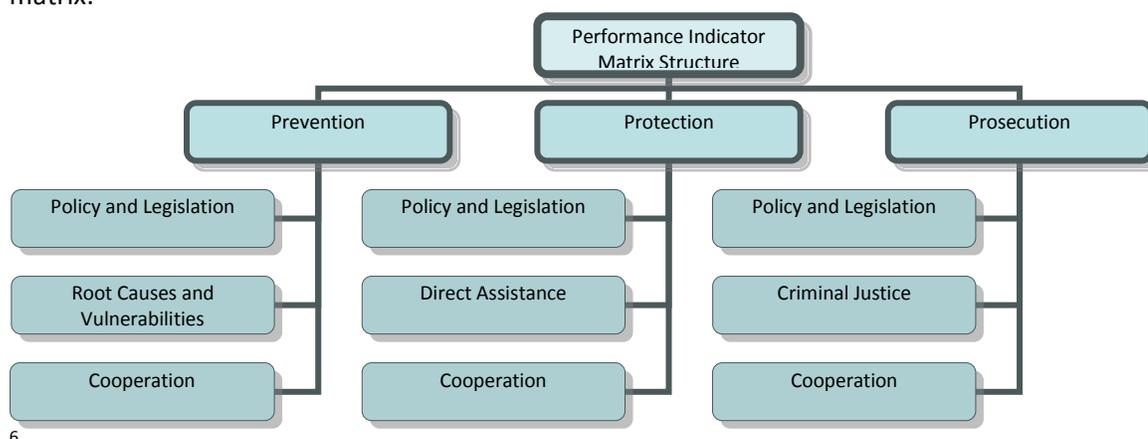
Recommendation: Referencing the commonly accepted definition of a *project strategy* or *overarching objective*, consider simplifying the statement to highlight **how** the intended activities *contribute* to the overarching objective (*i.e. The proposed program will enhance efforts to combat trafficking in Afghanistan.*). Therefore within the context of the logical framework, the following should apply:

Project Components	Indicators	Means of Verification	Assumptions
Overall Objective: The proposed program will enhance efforts to combat trafficking in Afghanistan			
Results:			
Activities:	Inputs for each activity	Budget:	
Preconditions			

Recommendation: If it is determined that both institutional development and civil society initiatives are required/desired, consider splitting the two into separate proposals. Doing so should assist efforts to manage activities, monitor achievements, while allowing all team members to remain focused.

7.2 Project Purpose(s) and Activities

Counter-trafficking generally focuses on three broad objectives: Prevention, Protection, and Prosecution.⁵ Though there are cross-cutting themes (victim-centered, gendered response, collaboration and partnership, and sustainability) the three “Ps” represent the most commonly referenced. Based upon these objectives IOM has created the following performance indicator matrix:



6

The purpose of the matrix is to assist project developers in “mapping-out” objectives and activities in order to best maintain a logical approach. This thereby allows for more qualitative and quantitative tracking of activities as they relate to strategic objectives increasing the likelihood of a project’s successful implantation.

Project purposes tend to be objectives that will be directly achieved by the project.⁷ Meaning, once a problem statement has been illustrated the purpose will directly address said problem. In addition, a project’s purpose must directly ensure the sustainable benefits for the groups targeted for intervention (in this case NGO and government personnel) and should not explain the activities of the project or intended results.

According to available information within the specific context of this project, the activities to be undertaken are very much in relation to the challenges and the needs of the region/sector. As it is imperative to ascertain the truest level of human trafficking that is occurring throughout Afghanistan and its immediate surrounds it’s equally as important to increase the capacity of those who are (or will be) tasked with the operational, legislative and juridical facets of counter-trafficking. Education across all strata of society is crucial towards establishing baseline knowledge of the challenges posed as a result of this illegal activity.

IOM has proposed to conduct training activities for governmental and non-governmental personnel consisting of the following:

⁵ Ibid, pg. 18

⁶ Ibid.

⁷ Ibid.

- NGO Capacity Building Training – Training will target five NGOs and strive to increase their baseline knowledge on trafficking issues as well as identify and train the same NGO partners for supporting activities.
- Governmental Training – Training will target multiple agencies within the Afghan government for the purpose of increasing baseline knowledge on CT/TiP issues.
- Study Tour for Ministry of Interior Officials – The study tour intends on facilitating the visitation of ten operational officers from Afghanistan to New York City.
- Computer Literacy Training – Training will attempt to increase baseline knowledge of computers and software for MoI officials.

7.2.1 Project Purpose 1: Increasing the capacity of law enforcement to investigate, document, prosecute, and analyze trends in trafficking in persons in Afghanistan.

The project purpose above is sufficient as is and fully illustrates a core objective of the proposed program. The purpose also adequately captures the intended governmental beneficiary groups listed (MoI, MoJ, police academy, CID, etc).

What is not adequately visible is the information which pertains to the performance indicators and intended results of the proposed intervention(s). Though the *training* of personnel is a desired goal it is not the end result and as such more information is required. Based upon this identified gap, program management should seek to provide more details of what it seeks to achieve through the implementation of training activities. An increase of baseline knowledge is laudable and necessary but what should occur as a result of the increased baseline knowledge? For example:

- Does the program aim to increase the number of criminal cases filed?
- Does the program aim to increase coordination between investigative bodies?
- Does the program aim to create mechanisms to assist in the aiding of investigations related to TiP?
- Does the program aim to enhance the capacity of the judiciary to convict and sentence traffickers?

The above questions do not purport to encompass all of the potential results following the receipt of training but should provide the basis for further investigation. Based upon the review of desired results more concrete performance indicators can be developed to ensure that effective project monitoring for ongoing activities and future programming strategies can be illuminated. As written, the training appears to increase the awareness of those targeted but it does not objectively state what will be done with the awareness once received. Nor does it propose to measure the level of awareness through any verifiable means leaving any *post hoc* evaluation to incorporate a high level of subjective analysis.

Recommendation: To most effectively demonstrate, the *Handbook* provides an illustrative breakdown of preferred options for similarly proposed programming. Though admittedly not definitive, the incorporation of many of the suggested logical framework language should assist in the clarification of the program. An example is excerpted from the *Handbook* and follows:

Prosecution – Criminal Justice System

Project Purpose	Performance Indicators	Target	Means of Verification	
			Data Collection	Data Source
H.1. Increasing the capacity of law enforcement to investigate, document, prosecute, and analyze trends in trafficking in Afghanistan.	- Sentences for traffickers are in proportion to other serious crimes	- Percentage increase of convictions out of total criminal cases	- Stats/ records review	- Government, relevant stakeholders
Results	Performance Indicators	Target	Means of Verification	
			Data Collection	Data Source
H.1.2 Enhanced capacity of front line officers and/or specialized officers to investigate trafficking complaints	- Officers' level of knowledge on the definition of trafficking, victim identification and laws that can be used to investigate trafficking complaints	- Percentage increase in officers' level of knowledge on the definition of trafficking...	- Pre/post surveys	- Officers who have been trained

The above logical framework exercise is crucial insofar that it identifies instances where additional information is required. Citing the *Result – Enhanced Capacity of Front line officers...*, we are at once able to determine that essential baseline information has not yet been obtained (or not provided to the evaluator). In order to effectively measure the impacts of training to be provided it is necessary to have preliminary baseline information. For training activities this most generally takes the form of pre-training surveys. Though program staff members may instinctively and definitively “know” that there is no current capacity or knowledge to cover TiP within the governmental institutions, a documented assessment is required to justify such claims. (*Note: It is understood that a survey has been conducted but no references to the document exist in project documentation.*)

Without a baseline survey, training may be randomized at best or completely off-target (as it concerns beneficiaries and needs) at worst; resulting in a misappropriation of limited donor funding. Though the project documentation references baseline assessments, none of the findings (if pertinent) have found their way into the core components of the proposed programming. Without having a definitive starting point from which to base the development and implementation of activities, outputs and

indicators will be subjected to a lack of crucial measurable data. It is likely that all future programming related to CT/TiP will be affected by this lack of information.

Recommendation: Develop and implement a baseline survey to assess the current capabilities and knowledge of targeted beneficiaries. If a baseline survey has already been conducted, incorporate relevant findings/figures to bolster the proposed results and indicators.

7.2.2 Corresponding Activity 1 – Law Enforcement Agency(ies) Training

Training will target enforcement officials from the Attorney General Office, Ministry of Justice (MoJ), Ministry of Interior (MoI), Police Academy, and Criminal Investigation Unit and will focus on increasing baseline knowledge of officials on trafficking related issues. As the proposed trainings are quite similar in content and duration the evaluation will analyze them collectively.

As the merits of training governmental officials on CT/TiP are difficult to dispute it is not the intent of this section to unnecessarily revisit previous critiques herein. Though training in and of itself can be considered a net-positive undertaking, based upon the program's framework, it is difficult to determine what occurs once training has been received.

The recommendation immediately preceding this section should serve as the basis from which all training should flow. Without having the baseline information incorporated into the proposed activities it is more difficult to envisage where the training should lead both the beneficiary groups and IOM as the implementing agency.

- Is this intended to be "one-off" training with no subsequent follow-on capacity building activities?
- How does the training to be provided lead to the institutionalization of CT/TiP issues?
- How do trainees subsequently transfer knowledge to counterparts in order to maximize effectiveness?

Based upon the review of the documentation and discussions with program management it is difficult to grasp what, if any, strategy exists for incorporating approaches and/or activities that lead to sustainability. In addition, as this is not the first CT/TiP project being implemented by IOM in Afghanistan it is crucial for the organization to begin creating a framework from which truer capacity building activities can spawn.

As for the proposed training, there is insufficient evidence demonstrating that agendas or curricula have been fully developed, leaving an inordinate level of work on the training to be completed. Considering that this equates to the majority of proposed activities, better preparedness to move this process along should have been observed.

Though examples of CT/TiP agendas were provided from trainings held in other neighboring countries, it does not appear as though significant effort has been allocated to the development of Afghanistan-specific training. This can be directly related to the fact that a baseline assessment is not being referenced in this process. The evaluation identified the following gaps within the training regiment and though some of the items could be realistically developed and/or adjusted during the implementation phases of the project, the fact that nothing has been developed to date is worrisome.

- **Baseline Assessment** - As no preliminary information gathering exercise has been incorporated into the planning process it is difficult to forecast needs of targeted beneficiaries.
- **Training Agenda** – Though training agendas were provided, in some instances agendas were insufficient and/or too basic. There was also a general lack of professional presentation (formatting, design, etc) in the materials provided.
- **Training Materials** – There appeared to be a general lack of training materials developed for the implementation of activities as none were provided to the evaluator. With the institutional resources available and IOM’s global experience on CT/TiP activities, it is as equally important to portray these facts to external audiences (trainees).
- **Trainer Selection** – It was understood that while trainers from neighboring countries may be providing some of the training it was still not certain at the time of the evaluation. Furthermore, no Terms of Reference for trainers were provided.
- **Trainee Selection Criteria** - No selection criteria (post, education, language, etc) for trainees were provided to the evaluator. This is crucial in efforts to leverage IOM’s stature as an intergovernmental organization and gives the trainer the ability to ensure that the training is maximized. It also can lay the groundwork for developing close working relationships with government counterparts.
- **Pre-training Questionnaire** - No pre-training data collection mechanisms have been created and/or formalized within the program. As difficult as it is (or can be) to implement activities in Afghanistan it is all the more imperative that trainers have a very clear sense of trainee needs and desires. Establishing such dialogue at the outset is crucial in the development of training that will have the most impact. A general training template may serve as a starting point but issues or topics of concern will likely differ region to region or agency to agency.
- **Post-training Questionnaire** – Though trainings have been implemented by IOM in the past in Afghanistan, as of this writing, post training evaluations in written format are still absent. It is understood that verbal feedback is requested and received; however, it is crucial to the development of training to provide an anonymous mechanism for providing feedback.

Recommendations:

- Conduct or incorporate findings within a baseline assessment;
- Develop more concrete and relevant curricula based upon assessment and pre-training questionnaire;
- Develop Terms of Reference for trainers;
- Develop and print compendium of materials for use in training;
- Develop and distribute baseline criteria for trainees to government counterparts in order to ensure that training is targeted and relevant; and
- Develop and distribute pre- and post-training questionnaires.

In attempts to look beyond the proposed training it becomes necessary to question the overall impact (intended) of the activities and their likelihood of promoting retention within the beneficiary groups or better, an institutionalization of CT/TiP components within the government agencies. As the project currently rests it is difficult to assuage concerns related to the potential sustainability of any of these training efforts.

While not intending to be overly critical, it is crucial to begin laying the groundwork for more direct linkages with government counterparts, even when governmental institutions' baseline knowledge and capacities are nascent. Taking into consideration that previous training activities have targeted governmental officials it is essential to identify how IOM, as an implementing agency, can strengthen the internal capacities of governmental counterparts to take on such trainings in the future. Nothing in the current project relates directly to the institutionalization of CT/TiP policies and/or procedures. As IOM already works directly with government officials and appears to have a very positive working relationship it would be short-sighted not to leverage this to solidify a more formalized partnership with the various government agencies.

7.2.2.1 Activity 1 – Efficiency

A breakdown of the budget as it relates to training activities for governmental officials is as follows:⁸

Trainings for Prosecutors	\$20,900
Trainings for Judges	\$18,900
Trainings for MoI	\$15,900
<u>Trainings for Police Academy</u>	<u>\$2,575</u>
Grand Total of Training Activities	\$58,275 USD⁹

⁸ Costs include Training Manual Development, Trainer salaries and transportation costs, Hall rental, Lunch, Participant Travel cost, DSA, stationary and logistical support

⁹ Costs do not include IOM Officials, General Program Support or Administration Fee

Grand Total of Beneficiaries 107

Cost per Beneficiary \$544

Based upon the project's intent to provide baseline training to a wide range of governmental actors with baseline training on CT/TIP-related issues, the costs for training an individual within acceptable norms though could be somewhat high when factoring in the "cost of doing business" within the local market. Since proposed trainings do not exceed two days, the daily average per trainee is \$272 USD. As with any training activity, costs per head are subjective insofar as they relate to the donor and implementing partners' perceived value-added.

7.2.2.2 Activity 1 – Effectiveness and Sustainability

In order to sufficiently measure the effectiveness of training activities a number of real-time and post hoc indicators can be considered. Pre- and post-training questionnaires provide immediate feedback to implementers, allowing adjustments to be enacted prior to subsequent training sessions.

Effectiveness indicators as related to the retention of training received and transference to the workplace are multiple. Attempts to "truly" measure retention rates have occurred though there is still no agreeable figure worthy of citation. Trainers, topic, level of trainee proficiency, time on the job, and general environment are only a few examples and all play significant roles in how training is perceived and absorbed.

To compensate for the "unknown" it is commonly accepted that consistent repetition is the surest way to increase competency and productivity as well as retain valuable staff members. Based upon the proposed trainings and the methodologies for delivery, the activities are not considered to be particularly effective or sustainable. As all of the planned sessions are one-time affairs with no formal follow-on activities it is difficult to envisage how either the trainees or IOM intends to cascade knowledge to the trainee's colleagues.

Though the training intends on targeting a sufficient number of government officials across multiple agencies, the risk in doing so is that training will not be deep enough to provide measurable indicators down the road. Meaning, the project may be attempting to target too many persons across too many agencies to its own detriment. Furthermore, since no Training of Trainer (ToT) or other attempts to institutionalize training within the targeted institutions are planned, it is not far-fetched to assume that little will come of this effort. The previous statement is admittedly subjective in nature and not intended to lay criticism at the feet of program management, but it is hoped that a thorough reevaluation of the overarching strategy as it pertains to training activities be considered. IOM should consider taking a more proactive approach as it concerns the institutional development of governmental partners as few organizations globally are better positioned and more knowledgeable on this topic.

Recommendations:

- Consider pairing down training to focus on a fewer number of government institutions where more attention can be provided – increasing the potential for agency retention and institutionalization.
- Consider incorporating ToT as a follow-on training in order to build capacities of officials.
- Determine methods and activities for building up the capacity for institutions to provide training themselves or in close collaboration with IOM.

7.2.3 Project Purpose Corresponding Activity 2 – Study Tour – The study tour proposes to facilitate the visitation of selected MoI officials to New York City.

Based upon the project document MoI Operational Officers are scheduled to conduct a study tour to New York City, NY USA. A primary objective of the tour is to provide an opportunity for shared experiences and is scheduled to take place over a ten day period.

In general, study tours that focus on knowledge transfers between specialized professionals can be very rewarding experiences. In addition to providing significant insight as to how other cultures (both in societal and professional contexts) cope with pressing issues, study tours can lay the groundwork for more intense collaboration (networking) and relationship building, limiting the negative impact of TIP as a result.

It is uncertain whether the proposed activity will provide the necessary “carry-on” value both in terms of the appropriateness and applicability of the information to be transferred. More importantly, it is unknown (based upon the project documents) what course of action will be instituted to cascade information to colleagues upon their return to Afghanistan. As is, no follow-on activity exists, all but ensuring that the effort has no carry-on effect.

The evaluation was also unable to determine the rationale for choosing the United States as a knowledge transfer destination with one of the world’s most complex urban centers, New York City, as the focal point. Though the donor is a USG entity, it is hard to determine where the value added lies under this scenario. Highlighting a few of the more glaring differences:

- **Urban v. Rural** – Investigation professionals in NYC serve in a larger law enforcement mechanism that is comprised of overlapping local (metropolitan), state, and federal jurisdiction and within each of these gradations exist additional law enforcement authorities. From Wikipedia¹⁰:

¹⁰ http://en.wikipedia.org/wiki/New_York_City

Located on the Atlantic coast of the [Northeastern United States](#), the city consists of five [boroughs](#): [The Bronx](#), [Brooklyn](#), [Manhattan](#), [Queens](#), and [Staten Island](#). It is the most densely populated major city in the United States, with an estimated 8,274,527 people¹¹ occupying just under 305 square miles (790 km²).^{[2][3][4][5]} The New York metropolitan area's population is also the nation's highest, estimated at 18,815,988 people over 6,720 square miles (17,400 km²).^[6]

Based on this information, New York City maintains a population density of over 27,000 persons in each square mile within the metropolitan's borders. Conversely in **Afghanistan the population density figure is 81** (eighty-one) per square mile. The criminal network, or those who operate the illegally, is often less of an unknown than determining what entity possesses the enforcement capacity, never mind jurisdiction, to promote justice. It is one thing to teach a person to fish; quite another to have them run a seafood processing factory when no previous experience exists.

- [Law Enforcement Jurisdiction](#) – Though by US metropolitan standards NYC is particularly centralized, as is the government in Afghanistan, this is where the similarities begin and end. Due to its geographical location, a heavy state and federal law enforcement presence operates side by side with municipal authorities. In addition, one of NYC's boroughs is an island, whereas Afghanistan is land-locked.
- [Demographics](#) – It is important to highlight the disparities of demographics between NYC and Afghanistan if only to demonstrate the complex nature of conducting investigations in such an environment.¹¹

New York is unique among American cities for its high use of and 24-hour availability of [mass transit](#), and for the overall density and diversity of its population. In 2005, nearly 170 languages were spoken in the city and 36% of its population was [born outside](#) the United States.^{[7][8]}

Anointed the "city that never sleeps" for a reason, NYC's public goods and services are generally functioning without cessation. Demographic breakdowns in Afghanistan consist of seven (7) statistically identifiable nationalities who speak roughly the equivalent number of languages.¹²

- [Religion](#) – Unlike the United States, Afghanistan is not a pluralistic society. As a country whose population's overwhelming majority practices Islam (99%)¹³ and is tribally-based, certain preconditions must be observed. For example, if the death of an individual factors into an investigation, how should law enforcement agencies cope with the need to promptly return

¹¹ Ibid

¹² <https://www.cia.gov/library/publications/the-world-factbook/geos/af.html>

¹³ Ibid

the individual to the family for burial as is commonly prescribed in the Muslim World? How do investigations cope with the inability to perform autopsies?

This is not in any way intended to suggest that the undertaking of investigations is easier in Afghanistan, on the contrary, the above examples are provided as a way to illustrate the drastic differences between the two case studies. The above are only scratching the surface.

In fact, when looking through all of the standard or commonly accepted socioeconomic indicators it is difficult to ascertain where similarities exist. Essentially, it is difficult to envisage a study tour destination that has less in common with the situation in Afghanistan than does NYC. If there exist virtually no identifiable commonalities from which to form common professional bonds, it is even more difficult to determine the value added of such an endeavor. As such, the evaluation has determined that the proposed intervention is unlikely to be effective or efficient enough to warrant implementation, especially if other more relevant options are not considered as alternative.

Recommendations:

- Regionalize – In order to maximize the effectiveness of the training look to facilitate study tour visitations to countries in proximity to Afghanistan. This should be considered for multiple reasons:
 - Promotes regional synergies - Encouraging the cooperation between enforcement agencies within the region will serve to lay the groundwork for longer-term collaboration and information sharing across borders. As TIP is never self-contained within a country's borders, synergies will increase the effectiveness of future efforts.
 - Identifies realistic benchmarks – Though having an illustrative idea of where long-term strategies should be pointed (e.g. NYC), more realistic achievements (short to mid-term) can be identified in countries facing similar issues though perhaps a bit more institutionally evolved than is Afghanistan. Hypothesizing, if Tajikistan has been building its CT/TiP capacity over the previous five years it has had, in essence, a "head start." Seeing this first-hand, the MoI Officers can more readily identify with the situation and where they should be going. Moreover, as MoI Officers are operational and not legislators, they are more likely to benefit from knowledge transfers that are less abstract.
 - Lessens financial burden – It is likely that if such an effort is regionalized costs will be lessened, thereby increasing the opportunity for additional officers to attend.

7.2.3.1 Activity 2 – Efficiency

As a general rule, it is difficult to determine the efficiency of study tours as they most often have multiple objectives, many of which are not measurable. A rapid cost-benefit analysis places the cost per participant for the ten days at roughly \$6,400 USD. Program management and the donor are best positioned to ascertain whether this is an acceptable rate.

What is evident, however, is that if program management and the donor conclude that regional (or at least closer in proximity than NYC) study tours are feasible, it is likely that numbers of participants, duration, or a combination thereof could be increased significantly.

7.2.3.2 Activity 2 – Effectiveness and Sustainability

The potential effectiveness of the study tour is difficult to gauge due to a number of mitigating circumstances. As no agenda or itinerary has been devised or beneficiaries selected, any hypothesizing would be just that: a subjective exercise.

Taking this admission into consideration it is still necessary to question the validity of this undertaking. As the proposed study tour is intending to provide off-site opportunities for operational personnel it is safe to conclude that the tour will not be looking at larger policy, legislation, or broader institutional frameworks, structures, or mechanisms that cope with CT/TIP. Eliminating these from consideration results in study tours that will likely focus on procedural components at the micro (field) level.

Based on this assumption the evaluation concludes that conducting study tours closer to 'home' will result in added-values above and beyond what could be obtained from visiting NYC. Likewise, whereas it is difficult to deduce a sustainability quotient from a visit to NYC, the same cannot be said if it were conducted regionally. The potential to forge cross-border/regional networks of like-minded professionals provides a crucial dimension of positive value that can serve as a launching pad for future collaborative endeavors.

7.2.4 Project Purpose 2: *Building the capacity of local NGOs on trafficking issues engaging in the referral mechanism to assist victims of trafficking.*

The purpose would most likely be classified as a *protection* performance indicator based upon the developed structure of the project. Based upon the agreed upon definition, the project purpose above delves into activities and is generally considered to be too informative.

According to the project document, supporting documentation, and anecdotal evidence, there is currently a dearth of NGOs that address counter-trafficking issues in

Afghanistan. In other countries and regions NGOs have traditionally played a significant role on the trafficked victim’s behalf, serving as the primary linkage between the beneficiary (or community) and the government. As such, it is the stated intention of IOM to, “involve five local NGOs and establish hotlines within each of these NGOs in ten different provinces where trafficking is high.” Preceding this NGOs will receive baseline training on trafficking issues, database management and maintenance, and reporting.

Though increasing the capacity of potential NGO partners is a laudable objective, it is uncertain whether this proposed activity was investigated thoroughly enough. Referencing the aforementioned passage as it relates to overwhelming the project’s strategy by incorporating activities that require varying approaches (operationally and managerially), it does not appear as though the scope of activities related to NGO capacity building was properly taken into consideration.

Recommendation: If it is concluded that NGO capacity building should be continued under this award, the management team should consider rewriting Project Purpose 1. (e.g. *To build the capacity of NGOs to identify victims and to provide direct assistance through targeted technical assistance*). Placing the statement within the format of the logical framework results in the following:

Protection – Direct Assistance

Project Purpose	Performance Indicators	Target	Means of Verification	
			Data Collection	Data Source
II. To build the capacity of NGOs to identify victims and to provide direct assistance through targeted technical assistance				

7.2.5 Corresponding Activity 1 Preliminary Assessment of NGOs and Activity 2 Selection and Training of NGOs

Activity 1 - A preliminary assessment will take place through interviews with all relevant civil actors and local authorities in order to identify potential partners and assess the local situation, including area-specific needs and constraints. Interested potential partners will be requested to submit an organizational profile, concept paper, work-plan and budget based on the terms of reference prepared by IOM.

While on the surface the activity merits consideration, it is insufficient for properly developing the capacities of civil society organizations that are to be tasked for such sensitive corresponding activities. As is written, the proposed activity reads as though it is seeking to identify a sub-contractor in the traditional sense rather than truly building

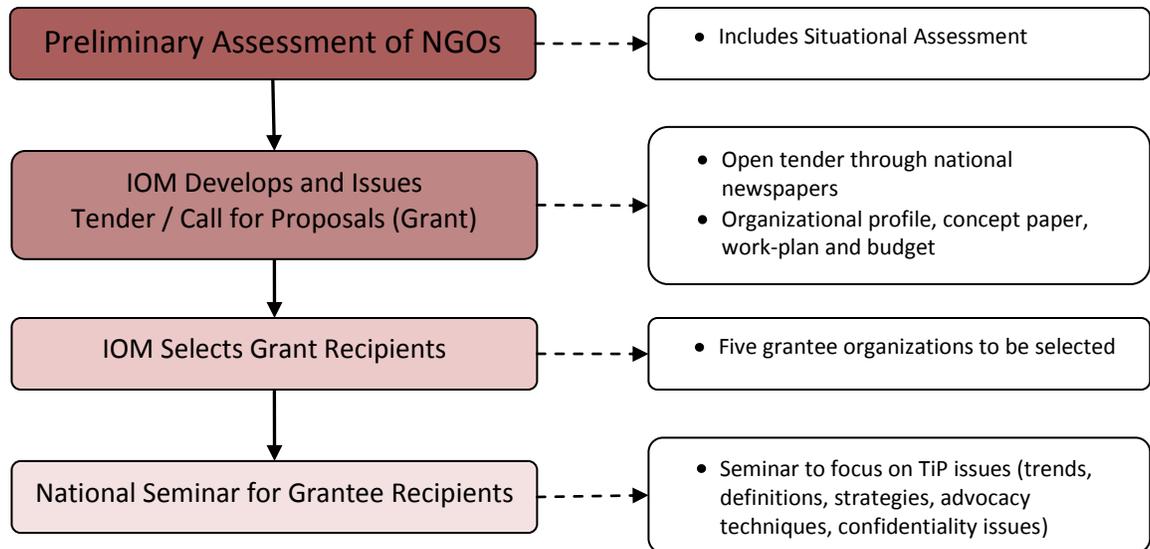
the capacity of a national counterpart. In addition, based upon conversations with program management it appears as though those national NGOs who have already been identified as possessing a sufficient capacity do not have a desire to partner with IOM due to the level of projected funding to be provided. Due to the attention being paid to national NGOs by external donors (incl. PIOs, INGO, Donor Countries, etc) it is simply not in the interest of the national counterparts to focus on the topic unless there exists a higher “return” or funds ready to be disbursed in addition to IOM small grants for using on a medium/long term the benefits of training/capacity building. Though not the fault of IOM, it is the reality of the current situation and must be a factor when evaluating the operational environment.

Activity 2 - IOM will organise a call for proposal through national newspapers. All local NGOs will be invited to participate in the competition for receiving IOM micro grants. A national seminar will be organised for the selected partners, during which the participants will be briefed on human trafficking trends, definitions, counter-trafficking strategies, victims’ advocacy techniques and respect of confidentiality. Participants will be encouraged to share their planned activities and lessons learned with the others. They will be provided with tools for information dissemination.

Initiatives to build the capacities of national NGOs are generally both labor and time intensive. Perhaps even more so when “mature” national NGOs are uninterested in entertaining approaches from potential donors with “shallow” pockets, as appears to be the case presently in Afghanistan. To effectively and efficiently target nascent organizations to act on behalf of, or in concert with victims of trafficking, a significant effort to educate them on these sensitive topics must take precedent.

As is too often common in post-conflict environments, the need to implement or “produce” outcomes overshadows the need to develop coping mechanisms that are comprehensive in their outlook even when they may not be resource rich. Considering that the activities projected to be implemented by the national NGO partners requires direct interaction with vulnerable individuals suggests that extra precautions should be observed.

The preliminary assessment appears to be the natural starting point for identifying potential partners; however, the way in which the process is illustrated herein raises some questions from a logical standpoint. Prior to a review of the actual activities to be implemented by selected NGOs it is important to look through the proposed flowchart of activities preceding actual implementation. Extracting major benchmarks from activities 1.1 and 1.2 in the proposal results in the following chart:



A preliminary assessment is scheduled to take place through an interview processes with civil actors and local authorities but it is uncertain who or how these interviews are to be weighted for subsequent evaluation by IOM. It is also unclear who is responsible for assessing the local situation. If it is to be the national counterpart, what exactly are they supposed to be assessing? As the National Seminar is intended to be the primary mechanism for imparting knowledge related to CT/TiP activities it is difficult to foresee how an informed decision by the potential implementing partner can be deduced.

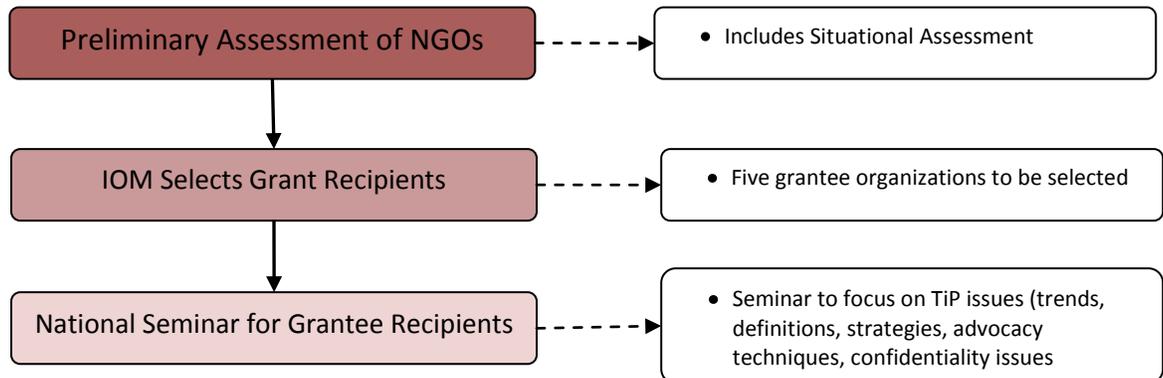
Furthermore, if IOM intends to facilitate an open tender (as it states) the need for a preliminary assessment of NGOs is moot. In scenarios where there is either a severe shortage or an overabundance of partners a preliminary assessment can be conducted as a means for "preselecting" potential bids. In cases where the activity is so unique that only a small percentage of bidders are foreseen, a preliminary assessment can be used as well. However, when coupled with an open tender via national newspapers the proposed activities (assessment and open tender) become contradictory.

Open tenders by their very definition are "open" to the general public, eliminating the need to conduct a preliminary or "preselected" assessment. Conversely, if IOM chooses to be more selective in the vetting of potential partners then an open tender is not the preferred methodology either.

Recommendation:

If it is determined to proceed with a focus on NGO capacity building, determine which type of selection mechanism will be the preferred choice. Considering the sensitive nature of activities that surround CT/TiP, IOM will likely best be served by instituting a more discreet approach, therefore the evaluation recommends an assessment rather than an open tender, and should include analysis of the financial health and future capabilities of the NGOs.

Based upon the initial flowchart illustration and the aforementioned recommendation, the amended activities are as follows:

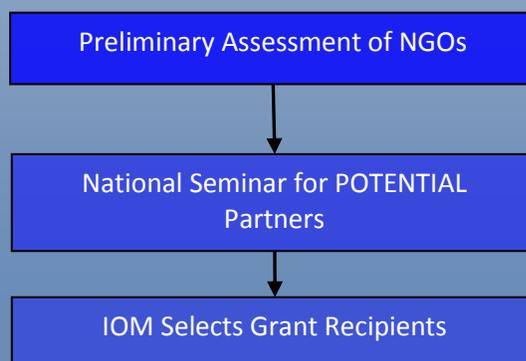


The above activity flowchart has streamlined the proposed steps but it still lacks a logical flow that would best position IOM to maximize, effectively and efficiently, its attempts to identify and empower local partners. The vulnerabilities of trafficked persons and the overarching mechanisms engaged in the actual trafficking significantly increase the risks of those organizations (and persons within them) who attempt to assist. Efforts to limit or thwart victimization runs the risk of placing them in direct conflict with those whose interest it is to traffic in the first place. Understanding the inherent risks is an imperative for any organization that seeks to engage in activities on behalf of the victims.

As is written, empowering or knowledge transfers (e.g. National Seminar) do not commence until *after* the selection process. This suggests that the partner organization will not have all of the necessary information in-hand to make an informed decision until following its selection by IOM. They will be in essence, bidding blindly (especially if an open tendering process is observed). Understanding that this oversight was not malicious in its intent it should be viewed as negligent at the very least. As has been designed it is not farfetched to assume that upon receiving all of the information after the fact, selected partners may back out of grant agreements. Should this occur, negative impacts on budgeting will be immediately felt. IOM unintentionally risks ostracizing partners before it has had the legitimate opportunity to form sustainable relationships.

Recommendation:

If IOM (and the donor) determines that investment in NGO capacity building is to continue under this award, a realignment of proposed activities should be considered based on the following for a couple of important reasons:



1. Ensures that potential partners are fully informed of the sensitivities and risks associated with CT/TiP activities; and
2. Expands outreach of IOM beyond the five (5) organizations. If a wider group of potential partners is invited to a National Seminar it is likely that IOM will garner interest beyond its ability to fund. This should be viewed as a positive dilemma as it positions IOM as an authority on CT/TiP and broadens the scope of organizations focused on the issue.
3. Work on additional financial support for implementing activities focusing on the assistance to victims through the NGO network created.

7.2.5.1 Activity 1 – Efficiency

Though the evaluation has repeatedly recommended a realignment of activities and corresponding budget related to NGO capacity building under this agreement, for the purpose consistency, the merits of this component will be analyzed as well.

Based upon budgetary breakdowns a total of \$97,700 USD will be in essence equally distributed across five (5) NGO partners, equating to roughly \$20,000 for each. These costs include those associated for the provision of training for NGOs by IOM. Therefore, the figure can be broken down as follows:

- Micro-grant \$16,000
- Training/Support Costs \$4,000

As highlighted above approximately \$16,000 USD will be provided to each NGO in the form of a micro-grant. According to project documentation, NGOs will be required to implement the following activities with this funding:

- Appoint a focal point and location to conduct advocacy;
- Operate hotlines through personal consultations over the telephone in urban areas;
- Conduct consultations in person (where telephone service is unavailable);
- Advertise through effective local channels such as radio, brochures, print media, outreach seminars and special performance and theatrical events;
- Develop Action Plan for outreach activities. Outreach target areas are: (a) vehicles and transportation hubs (bus stops, airports, border check points); (b) traditional social outreach networks (weddings, mosques, *mullabs*); (c) commercial public areas (bazaars and markets); and (d) public state buildings and parks; and
- Monitor and support victims through mediation and participatory outreach.

What immediately jumps to the fore when viewing the above is a question of how the proposed activities can be achieved under the allotted budget of \$16,000 USD? The activities are labor and physical resource cost intensive suggesting that the budget was not properly formulated (author's subjective interpretation). Should the activities be achievable under the proposed cost, it would be beneficial to view such a breakdown by line itemization rather than in lumped formatting¹⁴. Moreover, the duration of the proposed agreements and activities is also unclear.

7.2.5.2 Activity 1 – Effectiveness and Sustainability

As mentioned throughout this section the evaluation has determined that logical progression of activities is neither effective nor sustainable as originally designed. Even with significant amendments the ability for NGO partners to continue the activities beyond the lifespan of the agreement is highly unlikely.

8. Conclusions

The IOM Afghanistan Counter-Trafficking team is to be applauded for its efforts to date. In no way is this evaluation to be a direct reflection upon their capacities or dedication to achieving positive outcomes for actors vested in the prevention of this illegal endeavor. More importantly, team members work with determination in creating an environment that is safer for those who are subjected to the heinous acts of criminal networks. Taking these sentiments into account, some other indirect observations can be made:

¹⁴ It is understood that IOM is sufficiently adhering to prescribed donor guidelines (or else the project would not have been approved); however, for the case of determining if the forecast is realistic a detailed breakdown would be necessary.

- Staffing – Based upon the workload observed while in-country of the IOM CT/TiP team, senior management of both the program and mission should consider advocating for an additional international officer to assist efforts with this type of programming.
- Regional Coordination - Though program management has been able to leverage previous experience in the region through some collaborative efforts, more should be done to link CT/TiP efforts throughout the region. Of course to do so requires additional time and resources (not a luxury of the program at present), therefore, the need to for an additional Program Officer is critical.