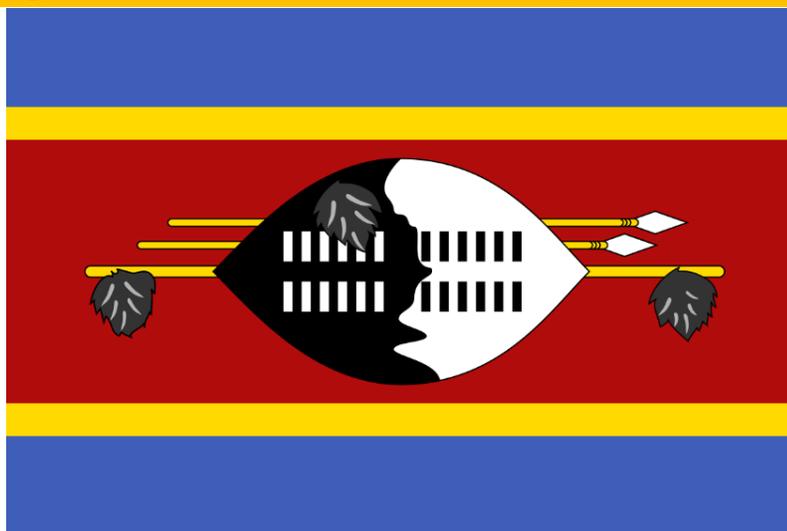


**EXPOST EVALUATION
OF THE**

**Strengthening Labour Migration
Management in Eswatini (LM.0305) Project**



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LIST OF ACRONYMS

CSO	-Civil Society Organization
DAC	-Development Assistance Committee
FESBC	-Federation of Eswatini Business Community
FESWATU	-Federation of Swaziland Trade Unions
IDF	-IOM Development Fund
ILO	-International labour Organization
INGO	-International Non-Governmental Organization
IOM	-International Organization for Migration
LM	-Labour Migration
M&E	-Monitoring and Evaluation
MOHA	-Ministry of Home Affairs
MOL	-Ministry of Labour and Social Security
NGO	-Non-Governmental Organization
NLMP	-National Labour Migration Policy
OECD	-Organization for Economic Co-operation and Development
RO	-Regional Office
SADC	-Southern Africa Development Community
SDG	-Sustainable Development Goals
SNEMA	-Swaziland national Ex-Miner Workers Association
SWAMMIWA	-Swaziland Migrant Mine Workers Association
TUCOSWA	-Trade Union Congress of Swaziland
TWG	-Technical Working Group
UNHCR	-United Nations High Commissioner for Refugees
UNICEF	-United Nations Children's Fund
CSO	-Central Statistics Office

EXECUTIVE SUMMARY

The project supported the government of the Kingdom of Eswatini, through the Ministry of Labour and Social Security (MoLSS), to develop a National Labour Migration Policy (NLMP) within the context of existing regional frameworks in the Southern Africa Development Community (SADC). To achieve this, the MoLSS, in coordination with the International Organization for Migration (IOM), established an inter-ministerial /multi-stakeholder coordination mechanism-the Technical Working Group. The TWG represented various relevant ministries, agencies and social partners. It was the core group that guided the process with support of an IOM recruited consultant.

The main achievement of this project was the development of a comprehensive National Labour Migration Policy (NLMP). This Policy was finalized and validated by the members of the TWG and, was officially handed over to the Minister of Labour and Social Security to submit to the cabinet for final endorsement prior to its implementation. This ex post evaluation came nearly two years after the validation happened and thus, it was possible to analyse the progress made in the post project period in analysing the success of the project. The main objective of the the evaluation was to promote transparency and accountability which will, in turn, assist the IOM Development Fund in its decision-making and, to better equip staff to make judgments about the project and to improve effectiveness where possible and with regard to future project funding.

The evaluation was conducted by the Regional Monitoring and Evaluation Officer for Southern Africa and it adopted desk review and key informant interviews as the main data collection methods, in the frame of a qualitative research. Interviews were carried out with sampled key informants drawn from the list of TWG members, attendees of the NLMP validation workshop, IOM staff and other officials who played a role in the development process. A total of 27 key informants were interviewed. Additionally, a review of all relevant project documents was conducted. The analysis was done in the lens of the six standard criteria for evaluation including *relevance, coherence, effectiveness, efficiency, impact and sustainability*. An additional criterion on *appropriateness of design and cross cutting themes* was added to the analysis. An indicative performance rating to indicate whether performance on each criterion was “*Excellent*”; “*Very Good*”; “*Good*”; “*Poor*” and “*Very Poor*” was adopted to provide an overall assessment of the evaluator’s perception of performance under each criterion.

After analysis, the evaluation finds that the project scores well on relevance as a need for a NLMP was not only a recognized gap in the country, but had been touted at regional level through the SADC regional labour migration action plan, which urged all member states to develop such policies by the end of the year 2019. The policy is therefore seen as an important initiative that enables the country to fulfil its regional and global commitments under the above-mentioned regional plan, but also under the Global Compact for Migration (GCM) and the Sustainable Development Goals. (SDGs)

The project’s score against coherence criteria is also excellent going by the large number of global, regional and national standards, norms, policies and legislative frameworks onto which the policy complements or operationalizes. Key among them are global human rights instruments, the SDGs, the GCM and, at regional level, the SADC Employment and Labour Protocol, the SADC regional Labour migration Action Plan, and the Migration Dialogue for Southern Africa recommendations, key ones being from a MIDSAs conference hosted by Eswatini in September 2017. The NLMP initiative was developed through an inter-ministerial process and that enhanced coherence with policies from other departments.

A key value the policy brought, was in highlighting the need for review of related policies and legislations so as to enhance policy coherence. On effectiveness, there is modest achievement on the overall. While the project scores well in the scope of activities and outputs, it is not the same for outcome level results. The change pathway from attainment of key outputs such as the validated draft policy and increased knowledge and skills would have had much more secondary effect, if the policy had been endorsed and implementation set in. As long as the policy has not advanced, the project's delivery in enabling better institutional performance in regard to labour migration management will remain limited.

The project suffered several delays resulting to two six month no cost extensions. The reasons for delayed implementation were mostly external, but the project had opportunities to draft mitigation strategies so that project timely delivery is not overly affected. The project eventually recorded an overall under expenditure of 31%, much of it being recorded under the operations budget area. This time use and budget management efficiency affects the overall score under efficiency. There are significant improvements that can be made in similar projects in the future.

The project has potential to make a significant impact on the welfare of individual labour migrants and on the institutional capacity to manage and benefit from a well-managed labour migration. As it stands however, there were no impact level changes that the evaluation was able to establish especially because the policy has not yet been adopted leave alone being implemented. The evaluation however, identified some promising changes in attitudes and practices which if sustained can lead to impact. For example, the evaluation noted a positive attitude toward migration/migrants across the board. Also, some stakeholders reported to have noted an improvement in the ease of acquiring work permits/visas whenever expatriate labour was needed.

On sustainability, there are a few risks that must be surmounted to assure sustainability. Firstly, the TWG or similar coordinating structure needs to be in place to continue the whole of government, whole of society coordination. As it stands, there is no such a structure anymore as the TWG has not met since the last meeting in June 2019. That the policy has not advanced much in its journey to adoption, is another cause of concern and a risk to sustainability. If this festers for more years, the investment made may be lost and the draft may become irrelevant for the times. There is therefore need for follow up to ensure that progress is being made.

Lastly, the evaluation examined the validity of the project design and integration of cross cutting issues. The original proposal was improved through a project revision. The project did not have an explicit theory of change, but it is implied in the document. The articulation of results was satisfactory as well as the choice and number of indicators. The design(proposal) is however largely silent on gender and human rights. There is evidence however that in implementation, in reporting and in M&E, gender (especially), was considered. The draft NLMP itself has a very visible gender and human rights perspective.

The evaluation ends with recommendations to follow up more closely to advance the draft policy in view of the fact that two years will have elapsed by July 2021. It also calls for inclusion of COVID-19 and labour migration in the context of pandemics in the planned NLMP revalidation; capacity strengthening of the team in IOM Eswatini and, continued resource and project development to kickstart implementation of strategic labour migration action points in the Roadmap.

1.0. Introduction

The project “Strengthening Labour Migration Management in Eswatini” was funded by the IOM Development Fund in 2016. It was originally planned to be implemented over an 18-month period with initial end date of June 2018. However, the project experienced several delays leading to its eventual finalization in June 2019. The project supported the Kingdom of Eswatini, through the Ministry of Labour and Social Security (MoLSS), to develop a labour migration policy within the context of existing regional frameworks. This project was part of a IOM regional initiative that dates back to 2016, which sought to support countries in the Southern Africa Development Community (SADC), to develop national labour migration policies, this being one of the key actions espoused under the SADC Regional Labour Migration Action Plan(2016-2019).

To achieve this objective, the International Organization for Migration (IOM) mission to Eswatini in coordination with the Kingdom of Eswatini’s Ministry of Labour and Social Security (MoLSS), embarked on a process to develop a National Labour Migration Policy (NLMP). Development of the policy was the main output of the project. The establishment of an inter-ministerial technical working group was among the initial activities of the project, besides the recruitment of an expert to facilitate the policy development process.

In the ensuing two years after commencement, the project coordinated various activities and events that culminated in the production of a draft policy, validated and endorsed by stakeholders and, ready to be submitted to the Kingdom of Eswatini’s Cabinet, for final endorsement, approval and promulgation. As per IOM Development Fund guidelines, an ex-post evaluation was due six months after the end of the project, in this case from January 2020 at the earliest and June 2020 at the latest. This period was however the peak of the COVID 19 crisis and thus the evaluation could not be conducted and had to be postponed to the year 2021, when travel and meeting restrictions had been eased.

This report outlines key findings emanating from the data collection exercise conducted between 16th to 31st May 2021 physically in Eswatini, virtually and via desk research. Before the findings, the report will briefly outline the context under which the project and the evaluation was conducted and briefly on the methodological aspects of the evaluation. Thereafter the findings and recommendations will follow. Several annexes have been provided at the end of the report. The next section is a short description of the project context and information about the purpose and methodological framing of the evaluation.

2.0 Context and Purpose of the Evaluation

2.1. Context

Labour migration is prevalent in Southern Africa. Labour migrants move to neighbouring countries in search of employment opportunities in such areas as in mining, agriculture, construction and manufacturing among others. SADC recognizes the invaluable contribution that labour migration has over the years brought to the region and thus, a need to put in place mechanisms that advance regular and, coordinated labour migration was widely accepted. This led to the development of several regional level frameworks to increase regional coordination and harmonization. The *2014 SADC Labour Migration Policy Framework* and the *SADC Employment and Labour Protocol* were specifically adopted at the time to guide labour migration processes in the region. Earlier on in 2005,

the SADC region also adopted the *Protocol on the Facilitation of the Movement of Persons*. All these frameworks at regional level gave impetus for the development of national level policies.

Nationally, the Kingdom of Eswatini, has traditionally been a country of origin for migrant workers especially miners going into South Africa. Migrant workers from neighbouring countries, especially Mozambique, are also known to enter Eswatini for work in the farms among others. Labour migration is therefore not a new phenomenon for Eswatini. The country did not however have a comprehensive policy guidance addressing labour migration. The National Labour Migration Policy (NLMP) therefore was aimed at availing a comprehensive tool to manage labour migration within, from and to the Kingdom of Eswatini. This initiative supported the Kingdom of Eswatini to fulfil its commitments under key regional labour and migration related frameworks.

2.2. Evaluation Purpose

This evaluation served both learning and accountability purposes. The overall objective was to determine whether the project achieved its intended objective(accountability) and to generate lessons/recommendations that future similar projects can benefit from(learning). The specific objectives of the evaluation were:

- To assess whether the project has delivered the intended results as set out in the project results framework
- To assess the immediate, intermediate and long-term impact (to the extent possible) of the project interventions
- To assess the constraints, if any, which have affected successful project implementation and propose corrective actions for future programming
- To assess in how far aspects of gender and human rights formed an integral part of project design and implementation processes.

The next section looks at the scope of this evaluation in terms of thematic coverage and time dimension.

2.3. Evaluation Scope

This being an ex-post evaluation, it was summative in nature and so assessed all project activities and processes from design phase to the post project period. The post project period totalling nearly two years, is critical in assessing the long-term success of the project, in addition to its contribution to impact and sustainability considerations. The actions taken or not taken in the post project period casts some indicative light into ownership and prioritization of the document and generates key lessons for future similar projects.

Thematically, all aspects of the project were assessed. These include, project conceptualization, project design, project planning, project management and coordination, implementation and reporting, monitoring and evaluation, project closure and post project follow up. These aspects are critical in assessing how well the project performed and, how performance or non-performance has affected overall results, merit and worth of the project. The evaluation also included an assessment of the integration of crosscutting themes, specifically gender and human rights.

2.4. Evaluation Criteria

The Organization for Economic Cooperation and Development-Development Assistance Committee's (OECD-DAC), six standard evaluation criteria, also endorsed by the United Nations Evaluation Group (UNEG) and IOM's Central Evaluation function, was used as a basis for analysis. The evaluation also assessed the

appropriateness of the project design, by examining the implicit theory of change and results framework. Under this additional criteria, gender and human rights/rights based approach mainstreaming, was also assessed to appraise the efforts made by the project at making these an integral part of design, implementation, Monitoring and Evaluation (M&E), as well as to identify any positive gender and, human rights results that the project may have brought about. Below is a presentation of the key questions¹ that guided data collection and analysis, under each of the criteria used.

<p>Relevance</p> <ul style="list-style-type: none"> ✓ <i>Was the project design responsive to the needs and priorities of the project's key stakeholders?</i> ✓ <i>Were stakeholders involved in the formulation of project objective and outcomes?</i> ✓ <i>Is the Theory of Change suited for the context, responsive to the identified challenge(s), and logically linked?</i> ✓ <i>Did the project design sufficiently take cross-cutting issues such as gender into account?</i> <p>Coherence</p> <ul style="list-style-type: none"> ✓ <i>What, if any, is the added value of the project?</i> ✓ <i>Were there any synergies and interlinkages between the project activities and other interventions carried out by the local institutions/government agencies/INGOs/NGOs and other actors implementing similar activities in the area?</i> ✓ <i>To what global, regional or national level norms, standards, instruments and frameworks does the project align to? How do they impact on the project and how does the project impact on these?</i> <p>Effectiveness</p> <ul style="list-style-type: none"> ✓ <i>Are the quality and quantity of the produced results and outputs in accordance with the approved results matrix?</i> ✓ <i>Did project activities lead to production of outputs as originally envisaged?</i> ✓ <i>Are outputs/products brought about by the project being utilised by the GoE and/or other partners to contribute to outcome or impact level results in the long run?</i> ✓ <i>What factors enabled or hindered the effectiveness of the project to deliver envisaged activities and outputs?</i> <p>Efficiency</p> <ul style="list-style-type: none"> ✓ <i>Were the project expenditures utilized appropriately and/or as planned?</i> ✓ <i>Does an assessment of the project results against the human, financial and time investment to the project show value for money? Was human and financial resource allocation and management optimal for the nature of the project?</i> ✓ <i>Were activities implemented on time as planned and carried out in a well-organized fashion?</i> ✓ <i>How well did the Partner Contribution/Involvement work?</i> ✓ <i>Were challenges in project implementation addressed swiftly and appropriately?</i> <p>Impact</p> <ul style="list-style-type: none"> ✓ <i>Does any evidence exist that significant contribution was made towards the long-term outcome and overall objective results? Do indicators show significant progress towards achieving the project's higher-level objectives?</i> ✓ <i>To what extent does/will the project have any indirect positive and/or negative impacts? (i.e. environmental, social, cultural, gender and economic)</i> <p>Sustainability</p> <ul style="list-style-type: none"> ✓ <i>Do stakeholders indicate that project outputs and built capacities will be used in future?</i> ✓ <i>Are the conditions in place for the project products and results to continue after the intervention has finished (financial, institutional, legal, technical and political)?</i> ✓ <i>Are there indications that the benefits generated by this project continue once external support ceases?</i> ✓ <i>What efforts or mechanisms did the project put in place to boost sustainability of results in the long term?</i> ✓ <i>How this project was interlinked with other IOM continuing initiatives?</i> <p>Validity of design</p> <ul style="list-style-type: none"> ✓ <i>Was the project design the most appropriate to enable effective project delivery, monitoring and evaluation?</i> ✓ <i>Were results and indicators properly articulated in line with IOM/IDF projects guidance?</i> ✓ <i>Was the approach utilized to implement and manage the project the most appropriate for the nature of the project? What lessons can we learn from this process?</i> ✓ <i>How did the project mainstream gender and human rights perspective in its design, implementation and monitoring?</i> ✓ <i>Did the project produce any gender related output results (positive or negative)?</i> ✓ <i>To what extent does the NLMP integrate gender and human rights perspectives?</i> ✓ <i>What lessons have been learnt and what best practices if any can be cited from this project?</i>
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¹ The evaluator further synthesized and consolidated some of these questions to enable a proper evaluation framework(matrix) as annexed in this report.

3.0. Evaluation Framework and Methodology

3.1. Data Sources and Collection

On the overall, this evaluation adopted a qualitative research design and utilized the following methods for data collection.

A. Desk research

The evaluator reviewed several documents relevant to the project, to labour migration policies and, on migration in general. A full list of all documents and other literature reviewed as part of the data collection phase are provided in Annex 6.3 at the end of this report.

B. Key informant interviews

One-on-one interviews were conducted with key stakeholders sampled from the list of members of the Technical Working Group (TWG) and from the Stakeholders validation workshop. IOM staff who coordinated the various project processes and, who have expertise or responsibility related to labour Migration Policies were also interviewed. A total of **28** individuals (14 Female, 14 Male) drawn from **17** different stakeholder groups were interviewed as broken down in Annex 6.4 provides detail of all the persons and institutions that contributed to this evaluation below.

Table 1 below presents a summary of total number participants engaged in this ex-post evaluation, disaggregated by gender and stakeholder group.

Table 1: Summary of evaluation participants.

Evaluation Participants	Total
State Actors (government ministries, departments & parastatals)	13
Non-State Actors (NGOs, trade unions, employers' federations, migrant associations)	9
Relevant IOM staff at CO & RO who played different roles in the project	6
Total number of individual contributions to the evaluation	28

Source: Evaluator own analysis

3.2. Data Analysis

Analysis of data acquired through desk review and key informant interviews followed a thematic analysis approach. Each evaluation criterion was considered a thematic category. A framework for arranging collected data against its source was developed-a kind of a cross-tabulation table. The data themes having been arranged against the sources were then synthesized to identify commonly occurring words, texts, phrases or statements to identify trends, patterns and emergent arguments. Comparing emergent arguments, trends and data patterns across sources helped to affirm or disaffirm each. As the amount of collected data was not very large, the whole data analysis process was done manually.

In arriving at an overall performance score for each criterion as presented in the report, the rating scale shown in table 2 was used. It should be noted that this rating is mostly based on the evaluator's subjective judgement, after interacting with and synthesizing available data and, from observations made throughout the evaluation process. It is meant to give an indicative performance rating of the project, not necessarily on the performance of the people involved with the project.

Table 2: Rating Scale and Criteria

Overall performance score for each evaluation criteria	Criteria for defining the performance score rating
Excellent (Always)	There is an evidence of strong contribution and/or contributions exceeding the level expected by the intervention.
Very Good	There is an evidence of good contribution but with some areas for improvement remaining.
Good (Mostly, some with some exceptions)	There is an evidence of satisfactory contribution but requirement for continued improvement.
Poor (Sometimes, with many exceptions)	There is an evidence of some contribution but significant improvement is required.
Very Poor (Never or occasionally with clear weaknesses)	There is low or no observable contribution.

3.3. Sampling

Random probability sampling methods were used: specifically, convenience, snowball and, purposive sampling methods. Convenience and snowball sampling were applied in relation to availability or not of targeted participants and interviewed participants being requested to help identify an additional participant based on the role they played or on the criticality of information they held. Purposive sampling was used in relation to targeted participants being perceived to hold critical information or insight valuable for the evaluation. These were independently identified by the evaluator and, a few more through snowball method. A mix of factors were used to identify potential evaluation participants. These included:

- Ω level of participation (or not) in project activities;
- Ω possession of knowledge (or not), including expert level knowledge on migration and/or labour migration policies and their development;
- Ω availability or unavailability on the evaluation dates for an interview;
- Ω willingness (consent) or not to be interviewed for evaluation purposes;
- Ω fair mix of government and non-government stakeholders and,
- Ω reasonable gender representation.

3.4. Limitations and Mitigation Strategies

The main limitations of the evaluation in order of importance include:

- a) **Timing of the evaluation:** Coming nearly two years after the project was finalized, some participants could not remember all activities and events vividly. The evaluation was also carried out during the COVID 19 crisis where public health measures such as social distancing, wearing of face masks and limiting the time of interaction, created unusual data collection circumstances. On the former, the evaluator invited a local staff member who played a neutral, non-influential role in the project to accompany him in interviews as an observer but also for purposes of providing historical and contextual information whenever necessary. Presence of this staff member was also an opportunity for the project to acquire direct feedback from stakeholders and, in many ways also contributed to validating the information contained in this report in that they can attest to stakeholders' views contained in this report, by virtue of having been present when such views were aired.
- b) **Little progress after policy was finalized:** The evaluation had prepared to track the progress made on the policy using the action plan developed to guide its implementation. During interviews, it was discovered that the policy had not been endorsed yet and thus not implemented. This curtailed a key area of assessment. The evaluator revised this scope of enquiry to capture general actions taken as part of normal ministry business rather than as a response to the NLMP action plan.

4.0. Findings

4.1. Relevance

Evaluator Rating on project Performance against Criteria:

Excellent

Without a doubt, the long history of labour migration from the Kingdom of Eswatini called for policy guidance. There is a wide agreement amongst interviewed stakeholders that such a document was long overdue, and, necessary to provide some guidance and framework for achieving more regular, orderly and beneficial labour migration. Majority saw the greatest relevance in addressing the challenge of portability of social benefits especially for Emaswati who work in South Africa for many years but end up not receiving their benefits. The emigration of labour and how to optimise its benefits seems to be the principal motivation or justification provided by majority of evaluation participants on why a labour migration policy was relevant. There is an appreciation amongst a modest proportion of participants that the NLMP also provides guidance on how to manage labour migration flows into the country. The evaluation established that the country has a history of importing expatriate skills especially in education (teachers) and in healthcare (nurses and doctors). It was also established that the country attracts seasonal migrant workers especially from Mozambique who come to work in the sugarcane and, in other farms. This labour movement was indicated to be historical.

The policy is also therefore perceived to have been relevant, in terms of its usefulness in regulating the flow of labour migration and, in providing clarity on what different actors must do, to ensure that there is orderly, safe and well managed labour migration. The policy also helps the Kingdom of Eswatini to fulfil its obligations under key regional commitments such as the SADC regional labour migration action plan and the SADC Employment and Labour protocol. Interestingly, this benefit was mostly highlighted by IOM and a just a few ministries. The regional linkage between the Eswatini policy and regional instruments did not emerge strongly from government ministries as it did with IOM and from desk review. There is nevertheless no doubt that the NLMP brings a key regional linkage. The table below provides further analysis of the needs/gaps that were present at the time this project was designed, analysed against the actions that the project undertook to determine their extent of contribution to relevance.

Table 3: An analysis of the project's relevance to identified needs/gaps (Source: Evaluator own analysis)

Existent Need/Gap	Project Response(s)	Level of contribution to Relevance (VERY HIGH; HIGH; MODERATE; LOW; VERY LOW)
Historical and sometimes irregular labour migration especially into South Africa	Though labour migration was already rife, there was no guiding policy framework to regulate this already existent phenomenon. Development of the policy was therefore a key response to this need.	VERY HIGH. Because both the process & draft product provides a practical solution to a real gap.
The need to fulfil Regional (SADC) commitments on labour migration	The SADC Labour migration Action Plan (2016-2020) requested member states to put in place national labour migration policies by 2019. This project helps the country to fulfil that regional commitment.	HIGH. Because it enabled the country to fulfil a regional requirement by having the draft. It is however not adopted.
Lack of data on labour migration volumes from/into Eswatini	Chapter one of the NLMP provides some data snapshot. Overall, the document provides a clear description of the patterns of labour migration that take place within, into, out of, and through the Kingdom of Eswatini thus providing strategic information for planning and decision making.	VERY HIGH because it consolidates socio-economic data and a brief migration profile providing situational information
Lack of harmonization/coherence of migration management processes & policies amongst ministries	Establishing the TWG was an initial step towards greater coordination and harmonization following a whole of government approach. In practice though, there is still room to improve coordination and policy coherence. This will call for actual policy amendments which is still work in progress.	MODERATE because though an inter-ministerial process helped highlight the need, the evaluation does not find practical steps having been finalized to harmonize policies across sectors

On the overall, it can be said that the project was relevant in terms of the need that was there as demonstrated above and going by the cooperation of the government, it can be concluded that it was a priority. Below are some direct statements captured from key informants when asked questions about the relevance of the project.

"We were not sure how many Emaswati are out of the country and what they are doing"

"We needed a policy that would create the understanding of the parameters for people migrating for labour"

"A policy was of great need because there was no management of people who are leaving and coming into the country...but also on the transferability of social benefits. It has been years since the government started chasing for social benefits in SA {for former Swazi migrant workers}"

"A Labour migration policy is and was necessary because we need to regulate the migration of persons from or to our country"

"The policy was relevant because the legislation we are using is outdated for example the Immigration Act is from 1982 and Passport Act 1971"

4.2. Coherence

Evaluator Rating on project Performance against Criteria:

Excellent

Coherence is a new criterion adopted in 2019 and focuses on identifying how the intervention **fitted amongst** a spectrum of other similar interventions implemented in the same space and, how it **aligns** with existing relevant frameworks (norms, standards, laws, policies). An intervention must be a best fit rather than an outlier. It also explores the specific gap(s) the intervention filled considering other similar interventions.

The development of the NLMP is viewed by stakeholders as a progressive step as it inspires the need for updating some of the old policies and legislations currently used to manage labour migration and, migration in general in the Kingdom. In this case the key ones include the Immigration Act of 1982, the Employment Act of 1980 and the Passport Act of 1971. There are a couple of initiatives that the government was already pursuing, and this labour migration policy complements such efforts. Some of these include

- ❖ Development of a new Citizenship Bill
- ❖ The adoption of a Training and Localization Policy
- ❖ A new Employment Bill (in parliament)
- ❖ Initial consultations on reviewing the Immigration Act held in 2020. (Immigration department reported to have held a stakeholder's workshop in 2020)

Interviews did not reveal any instances where the draft NLMP was deemed to conflict with the above initiatives. Stakeholders view the NLMP as value adding and perhaps possessing the ability to push for finalization of some that have been pending for some time such as the Employment Bill, but also give impetus to review the old policies and legislations as mentioned earlier. The evaluation finds this to be satisfactory level of internal coherence due to the synergistic feature the NLMP bears alongside other related processes.

In terms of consistency with existing norms and standards to which the Kingdom of Eswatini adheres, the evaluation finds alignment with the following.

At **global level** some selected instruments and frameworks that the policy aligns with include²,

- ❖ The Sustainable Development Goals specifically 8.5, 8.7, 8.8,10.7; 10.C
- ❖ The Global Compact for Migration
- ❖ ILO Conventions 97 on *Migration for Employment* and 143 on *Migrant Workers (Supplementary Provisions)*, though the Kingdom of Eswatini has not yet ratified these.
- ❖ Other ILO technical conventions especially *C157-Maintenance of Social Security Rights Convention, 1982 (No. 157); C181 - Private Employment Agencies Convention, 1997 (No. 181) and C189 – Domestic Workers, 2011 (No.189)*. These are also not ratified by Eswatini, but the NLMP links.
- ❖ The 1990 *United Nations International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families*-which is also not ratified by Eswatini.
- ❖ *United Nations Convention against Transnational Organized Crime* and its three supplementary protocols on *Prevention, Suppression and Punishing of Trafficking in Persons; Protocol against the Smuggling of Migrants by Land, Sea and Air and the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, their Parts and Components and Ammunition*.

Regionally the NLMP links with,

- ❖ African Union's Strategic Framework on International Migration (2006)
- ❖ African Union Commission (AUC)'s Ouagadougou + 10 Declaration and Plan of Action on Employment, Poverty Eradication and Inclusive Development.
- ❖ SADC Labour Migration Policy Framework and Action Plan
- ❖ *SADC Protocol on the Facilitation of the free Movement of Persons*
- ❖ *SADC Protocol on Employment and Labour*
- ❖ *SADC Declaration on Tuberculosis in the Mining sector*

At **national level**, the evaluation also finds synergy between the NLMP draft with,

- ❖ *The Constitution of Eswatini, 2005*
- ❖ *Immigration Act No.17 of 1982;*
- ❖ *Citizenship Act, 1992;*
- ❖ *People Trafficking and People Smuggling Act of 2009*
- ❖ *Refugees Act 142 of 2017* in terms of its labour and employment legislation
- ❖ *Industrial Relations Act of 2000* Code of good practice: Employment discrimination
- ❖ *The Employment Act, No. 5/1980*
- ❖ *Workmen's Compensation Act, 1983 (No.107)*
- ❖ *Occupational Safety and Health Act, 2001*
- ❖ Technical and Vocational Education and Training and Skills Development (TVETSD);
- ❖ National Employment Policy
- ❖ National Human Resources Development Plan
- ❖ The Localization Policy
- ❖ National Poverty Reduction Strategy Action Plan

As it can be seen the NLMP development initiative was extensively coherent with existing frameworks norms and standards at all levels. One key aspect the evaluation would like to highlight is that though Eswatini has not ratified some key global instruments the provisions in the draft policy encompass aspects of such global frameworks and the policy itself does make a statement of intention to consider ratification.

Next, is a presentation of some direct statements from key informants to illustrate how key informants view this policy's coherence aspects.

² While Eswatini has not ratified the most pertinent international instruments on migrant workers (ILO C97, ILO C143 and ICRMW), it still adopts aspects of these in its own laws, and it may draw on a range of other international, regional and sub-regional conventions and frameworks to guide its labour migration management.

“It broadened the minds of people working in different sectors in terms of helping us realize that we need to integrate with this one and this one”

“The policy may give a push to ratify key ILO conventions”

“The Labour Migration Policy will likely influence a Migration Policy”

“The {size} of TWG was increased with time. We advised on the need for greater representation”

4.3. Effectiveness

Evaluator Rating on project Performance against Criteria:

VERY GOOD

The project delivered most of what it was expected to deliver as a project. The main product from the project, i.e. the labour migration policy is however yet to be endorsed nearly two years later. This affects performance on the subsequent output areas. The evaluation finds mixed performance in the three outcome areas, resulting to a “Very Good” rather than “Excellent” overall rating.

Planned Results	Evaluation Performance rating and Analysis on achievement (Full, Moderate, Low ³)
<p>Overall Objective: The Kingdom of Eswatini is implementing a labour migration policy based on the policy implementation roadmap within the context of existing regional frameworks</p>	<p style="text-align: center;">LEVEL OF CONTRIBUTION⁴: MODERATE</p> <p>The project has not made much contribution to the overall objective because the policy, since the last validation workshop has not been endorsed by the Labour Advisory Board and eventually the cabinet. Consequentially, wide scale implementation of the policy is therefore also curtailed. In spite of that, there are several actions taken by different government departments that to some extent contribute to this overall objective and that link with some of the activities listed in the NLMP draft implementation plan. The evaluation identified the following;</p> <p><u>Policy area 1: Governance</u></p> <ul style="list-style-type: none"> ✓ Efforts underway to review relevant legislations e.g. Immigration Act; Employment Act, Industrial Relations Act ✓ MOLSS reported that there are considerations being made to ratify some more key ILO conventions⁵ ✓ Training and Localization policy developed ✓ The government has been engaging in relevant SADC forums such as the Employment and Labour Sector (ELS) and the Migration Dialogue for Southern Africa (MIDSA) <p><u>Policy area 2: Labour market information and analysis</u></p> <ul style="list-style-type: none"> ✓ Labour Force survey questionnaire has more questions on migration ✓ Census questionnaire already had migration related questions ✓ The Labour Market Information System (LMIS) Job seekers Form and Establishment Register now has migration questions <p><u>Policy area 3: Decent work for migrant women and men</u></p> <ul style="list-style-type: none"> ✓ Continued government engagement with South African authorities on the issue of access to social benefits for Swazi migrant workers <p><u>Policy area 4: Migration for development</u></p> <ul style="list-style-type: none"> ✓ Training and localization policy developed <p><u>Policy area 5: Health</u></p> <ul style="list-style-type: none"> ✓ Continued provision of Tuberculosis and general health services to mineworkers through the national TB programme

³ For purposes of this evaluation: **full** means that all aspects of achievement or contribution were observed. **Moderate** means partial but significant level of achievement or contribution. **Low** means poor performance i.e. partial but significantly low or below average performance.

⁴ Projects are not entirely responsible for delivery of overall objective and outcome results as they do not have full control; projects contribute. Rating on overall objective and outcomes is thus indicated as level of contribution rather achievement, in the sense that a project(alone) may not achieve an overall objective or outcome. For output and activities projects are required to deliver as they are within their span of control and influence. For this the evaluation uses the term “level of achievement”

⁵ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:4022740

Planned Results	Evaluation Performance rating and Analysis on achievement (Full, Moderate, Low*)
	<p>Given that the policy still needs to be endorsed and pave way for resourcing and implementation, there is still more to be accomplished. IOM has some influence it can make in advocating at highest levels for progress to be made towards final endorsement of the policy.</p>
<p>Outcome 1: A comprehensive finalized draft of the labour migration policy is developed and made available to government and other stakeholders</p>	<p style="text-align: center;">LEVEL OF CONTRIBUTION: FULL</p> <p>The project effectively facilitated development and validation of the labour migration policy and availed it to government for the remaining endorsement processes. A review of the draft policy shows comprehensiveness in terms of the wide variety of labour migration themes tackled and the multi-stakeholder approach followed in its development, and that also engaged the tripartite partners (government, workers and employers). There is no significant negative feedback that was received throughout the evaluation regarding the content of the policy and the process followed. Therefore, to the extent that it had control and considering its scope, the project delivered on this specific result.</p>
<p>Output 1.1: An inter-ministerial coordination mechanism for the labour migration policy is revitalized and functioning</p>	<p style="text-align: center;">LEVEL OF ACHIEVEMENT: FULL</p> <p>The project fully achieved this by working with relevant government ministries to establish a Technical Working Group comprised of not only key government departments but also other non-state actors. The project had planned that the TWG would remain functional by regularly meeting. Project records show that the TWG met at least six times just as planned, with the last meeting having been held in June 2019. This contributed to the successful development of the NLMP.</p>
<p>Activities under output 1.1</p>	<p style="text-align: center;">LEVEL OF ACHIEVEMENT: FULL</p> <p>Project reports show that all the three planned activities under this output were 100% delivered.</p>
<p>Output 1.2: Increased knowledge and skills in labour migration management inclusive of legislatures (i.e. SADC Free Movement of Persons Protocol and SADC Portability of Social Security Benefits Framework), and labour migration policy development among officials from all relevant sectors.</p>	<p style="text-align: center;">LEVEL OF ACHIEVEMENT: MODERATE</p> <p>The project facilitated two workshops i.e. a Migration Management workshop and a Labour Migration Policy development workshop. Pre and post training assessments to measure whether knowledge and skills had been increased were administered in the first training indicating a 12% improvement in mean score (a modest achievement as far as this evaluation is concerned). No knowledge transfer assessment was conducted in the other training. Additionally, the project slightly did not reach the training targets with 14 out of target 15 participants for the first workshop and 14 out of target 20 for the policy development training workshop. Anecdotal observations made during the evaluation interview meetings however points to some level of awareness on key migration and labour migration concepts as well as very positive attitude towards migration and/or migrants amongst all interviewed officials. Without a baseline on how the situation was before the trainings, it is difficult to say whether current state represents an improvement or not. The evaluation does however note a positive migrant sentiment among officials both in government and outside government.</p>
<p>Activities under output 1.2</p>	<p style="text-align: center;">LEVEL OF ACHIEVEMENT: MODERATE</p> <p>Both planned workshops were held. However, as noted above, there was a slight variance in activity target achievement. Pre and post training assessments for one of the workshops though envisaged in the results matrix was not undertaken.</p>
<p>Output 1.3: A list of inputs is consolidated in regard to the draft of the comprehensive labour migration policy</p>	<p style="text-align: center;">LEVEL OF ACHIEVEMENT: FULL</p> <p>The consultant consulted a wide range of stakeholders in the process of framing the draft policy document. Additionally, a validation workshop bringing together stakeholders did provide additional inputs to the first draft of the documents. The evaluator's interpretation of gist of this output was that stakeholders' contributions have been acquired, documented and considered in drafting the policy. In this regard, there is evidence that indeed the policy though drafted by a consultant, benefitted from stakeholder contributions. There were opportunities availed for stakeholders to add, remove or amend the content via TWG meetings, bilateral meetings and through the validation workshop where a broader array of</p>

Planned Results	Evaluation Performance rating and Analysis on achievement (Full, Moderate, Low)
	stakeholders attended. Additionally, all interviewed stakeholders indicate agreement with the content of the policy.
Activities under output 1.3	LEVEL OF ACHIEVEMENT: FULL All the seven planned activities under this output were fully accomplished.
Outcome 2: The roadmap for the implementation of the national labour migration policy inclusive of a resource mobilisation is implemented by the Kingdom of Eswatini	LEVEL OF CONTRIBUTION: MODERATE A roadmap was developed and validated by the TWG members and in a validation workshop that was attended by 40 persons in the NLMP validation workshop. As the NLMP had not yet been endorsed by the time this evaluation was conducted, the roadmap in effect could not be implemented. However, as noted earlier under the overall objective, there are some modest initiatives accomplished or ongoing that correspond with some of the activities listed in the roadmap.
Output 2.1: The roadmap on policy implementation inclusive of a resource mobilisation plan is printed and disseminated to stakeholders and partners	LEVEL OF ACHIEVEMENT: MODERATE The draft policy includes a brief roadmap. At a later stage, a more detailed roadmap for implementation was developed in conjunction with ILO. However, the roadmap did not include a distinct resource mobilization plan or strategy as envisaged under this output. It only included budget estimates and it is not clear how and from where indicated resources would come from.
Activities under output 2.1	LEVEL OF ACHIEVEMENT: MODERATE Two of the three planned activities were fully accomplished. However, the third activity, "follow-up on policy implementation and resource mobilisation with various donors" is partially achieved because this needs the NLMP endorsement/approval by cabinet which is yet to be done.
Outcome 3: Legislatures demonstrate increased understanding of the SADC Free Movement of Persons Protocol and SADC Portability of Social Security Benefits Framework and willingness to advocate towards ratification	LEVEL OF ACHIEVEMENT: MODERATE The project did this mainly through presentations made at various meetings. However, as the target audience was legislatures(parliamentarians) there is a sense in which this was missed as no presentation was made to parliamentarians during the project. The only briefing made to parliamentarians happened post project a few weeks leading to this evaluation and its focus(partially) was on the draft NLMP. Both MOLSS and IOM Eswatini officials interviewed felt that also it was not very effective, and a further briefing may need to be organized. From interviews the aspect of portability of social benefits appears to be more well known among interviewed officials. There is also a greater general appreciation of the positive influence of regional instruments in labour migration management at national level. The need for ratification of the key regional instruments specified here was included in the recommendations to cabinet that were to be presented together with the draft NLMP. This submission has however not been done yet.
Output 3.1: A 2-page document inclusive of recommendations towards the ratification of the SADC Free Movement of Persons Protocol and SADC Portability of Social Security Benefits Framework is finalized and endorsed by legislatures to be submitted to cabinet.	LEVEL OF ACHIEVEMENT: FULL Instead of submitting a separate two-page document, members of the TWG decided to include these recommendations on the same package that was submitted to the cabinet for final endorsement. That these have not yet reached cabinet by the time this evaluation was conducted indicates that this output though achieved is yet to produce results. What has not been achieved yet is the objective behind its development.
Activities under output 3.1	LEVEL OF ACHIEVEMENT: FULL Both activities listed under this output were delivered.

From the above analysis, it is notable that the project was relatively successful in some areas but not in some others. The evaluation sought to find out the factors that enabled success in the aspects that were properly delivered. The following are some of the **enabling factors**:

- ✓ Good stakeholder cooperation and a collegial environment within the TWG
- ✓ Regional instruments and commitments such as through MIDSA, ELS, and regional plans and protocols that gave some push for national level action

- ✓ Sound relationship between the Government and IOM country and regional teams
- ✓ Fairly adequate funding allocation for this project's activities
- ✓ Availability of expertise from government, IOM and the consultant that enabled compilation of a high-quality document
- ✓ Fairly straight forward project design in terms of what it sought to achieve

There were however a few **challenges** that hindered success as follows,

- ✓ The slow pace of progress towards approval of the document as nearly two years later, it had not yet reached cabinet
- ✓ The initial project time frame (18 months) was not realistic for such a consultative process that is bound to experience delays. Time was therefore a constraint and delays led to the need for an additional 12 months to finalize the project
- ✓ Consultant and Staff changes at IOM Eswatini office. The initial consultant resigned from the task for personal reasons and thus a new process for recruiting a new one had to ensue thus sometime was lost. There have also been two changes in the IOM mission's Head of Office/Project Manager since 2017. This has an impact on continuity
- ✓ As a key stakeholder in labour matters, ILO's contribution was necessary, and the government was keen to have their review. However, it took a long time to receive that response as ILO did not have representation in the country and the evaluation understood that at the time, ILO did not have a Labour Migration expert in the Southern Africa region. This delay affected project completion.
- ✓ Elections in late 2018 also affected the project as a new government was settling in

Below are some observations made by interviewees in relation to the extent of the project's delivery.

"This project was a way to show that IOM is here and ready to support. It was one of the promises IOM made to government on support"

"This has opened some doors for us to enable us to develop further new initiatives"

"The policy development process in a way also increased the awareness on the need to make different policies speak to each other"

"Before I became part o the TWG my perspective was so narrow, but the training expanded my scope of thinking in terms of migration"

"By the time we finished we knew what we were talking about. We could envisage a roadmap"

4.4. Efficiency

Evaluator Rating on project Performance against Criteria:

Good

The evaluation assessed efficiency from different frames namely: *project management/coordination efficiency; project delivery efficiency* and, *budget management efficiency*. In assessing project management efficiency, the evaluation considered, and, collected feedback from stakeholders on the project's quality of planning, coordination, communication and, overall facilitation. Nearly all interviewed stakeholders provided very positive feedback about IOM's support to the different processes. They appreciated IOM's technical guidance as well as funding without which, this process would have been impossible. There was some feedback on communication received though from a small section of interviewees who noted that sometimes meetings would be called or cancelled too late. They noted that this may have had nothing to do with IOM as invitation to meetings came from the MOLSS.

Regarding project delivery, the evaluation considered the implementation timeliness and proportion of planned activities that were delivered by the end of the project. As analysed under effectiveness earlier, the project performed nearly all the activities that were planned. The main weakness is in timeliness. This is a project that experienced significant delays. The evaluation views the initial 18-month project period as having been too ambitious considering the highly consultative nature policy development requires. The internal staff changes at IOM also means several weeks or months of implementation were lost. Externally, ILO's review that was awaited ended up extending the already delayed project. The ILO delay was cited as the foremost reason that led to the significant delay in finalizing the project.

The use of a consultant to do the drafting seems to have been an acceptable approach to developing a policy going by interviews. All key informants spoke in favour of using an external consultant with most of them citing the opportunity to learn from international exposure and best practices, as a key strength especially if the consultant has performed many similar consulting roles in different countries. It was noted that the use of external consultants for policy development was not a new phenomenon in the country. Upon further probing, key informants do however also see the potential strengths that local expertise can hold. For example, there is recognition that if local academia were involved in the process, it could have helped to identify local experts who can perform such consulting roles in the future. This is an aspect IOM Eswatini could explore further in efforts to also build and utilize local capacities.

In terms of budget management efficiency, the evaluation analysed the level of expenditure by the end of the project. The project's total funding was **USD 150,000**. Out of this, **USD 148,960** was dedicated for staff, office and operations (this is excluding the allocation for post project evaluation). The final project financial report shows an overall expenditure on these three areas totalling **USD 102,755**, which represents a **69%** expenditure. There is a small under expenditure under staff costs (**3%**) which is reasonably acceptable. However, under expenditure under office and operations (project activities) are fairly significant with an under expenditure of **16%** in office costs and, a much larger one of **43%** on operations. Overall, the project was **31%** underspent if you exclude the post project budget which would otherwise not be spent within the project life period. This under expenditure is significant and the largest contributor is on the allocation for developing a roadmap for implementation (Output 2.1). From the financial report, **USD 18,760** that was allocated for printing and dissemination of the NLMP Roadmap for implementation (Output 2.1) was not spent and this contributes a lion share of that under expenditure. There was also a significant under expenditure in output 1.3. It costed less than it was anticipated. Below is a snapshot of the expenditure levels as described above.

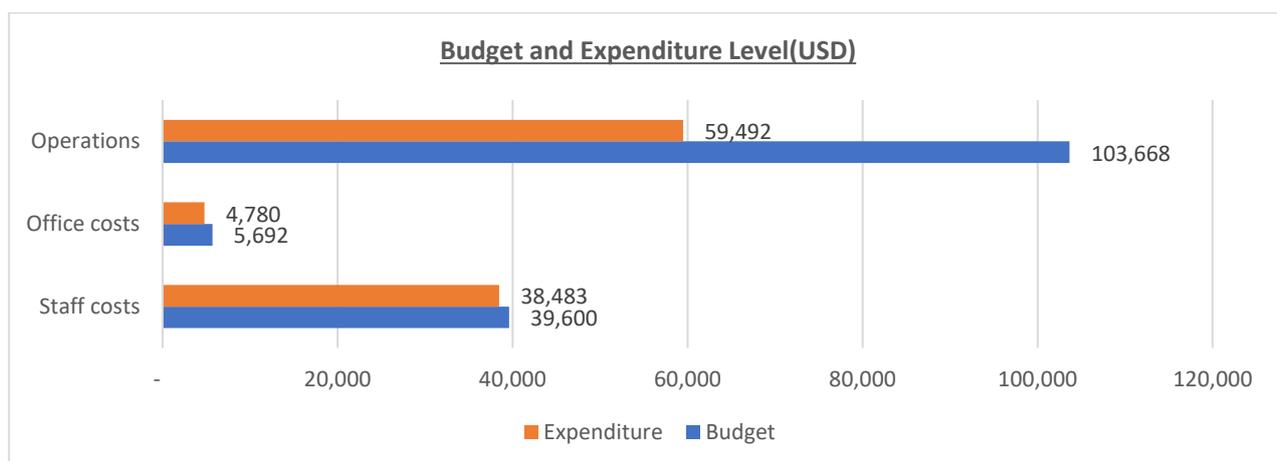


Figure 1: Budget expenditure rate by the end of the project (Source: Evaluator own analysis)

The two outputs cited above contribute the most to the overall under-expenditure although the project still achieved what was planned. There are a few reflections from this:

- a) There are possible problems with the budgeting process. It was perhaps not based on market rates and thus the generous allocations ended up not being spent. This is a possibility because at the time this project was being designed, IOM had just newly established the office in Eswatini, and for most part project design and support was done from the regional office. Those responsible may not have had proper on the ground information and this could have led to overbudgeting.
- b) There is a logical problem with the budgeting. A road map needed not be printed and disseminated when the policy itself was not endorsed. Allocating a budget for the roadmap was perhaps based on an ambitious assumption that the policy would be adopted before the 18-month project lifetime elapses. This ended up not being the case and this budget therefore remained untouched. Of note is that the policy itself contained a highly summarized roadmap. It is however understood that later with the support of ILO, the more detailed Roadmap for implementation was developed. The cost of developing a roadmap could have as well been integrated within the budget line for the policy development.

In summary, though all planned activities were eventually delivered, the evaluation finds that the project was plagued by significant delays that resulted into a variance in planned project timeline for reasons earlier outlined and two *No-Cost Extensions* totalling a year had to be sought. At the end, the project was still underspent though as outlined above, this appears to be more related to weaknesses in the project budgeting than actual delivery because the project delivered most of what it was meant to deliver. In the context of an evaluation analysis, project delivery efficiency is notably impacted by these two factors (delayed implementation and overall under expenditure) especially given that there were aspects that were within the control of the project or IOM in general, for example a request for budget modification, increasing number of those trained to reach more officials, or perhaps conduct refreshers among others. Nevertheless, the evaluation acknowledges that most of the planned activities were undertaken and, viewing this against the weaknesses described above the evaluation rates performance on this criterion, “Good” rather than “Very Good” or “Excellent”.

“The periods in between were too long. Perhaps we could have made the process more rapid”

“I have participated in policy development before but not to the extent as this one where I was so involved”

“It was quite an engaging process”

“The invitation process was lacking in some ways...sometimes there would be instant postponement of some meetings”

“Having the training workshop before hand was a very good idea”

“I felt like sometimes there was an overemphasis on miners and domestic workers in south Africa”

“Representation from the education sector was not necessarily adequate because the education sector is quite broad”

4.5. Impact

Evaluator Rating on project Performance against Criteria:

Good

Impact relates to long term development change or, a sustainable improvement in the conditions of rights holders. Projects contribute to impact in the long term. It is an indirect or secondary effect that comes long after interventions are implemented. It was a challenge for this evaluation to objectively assess impact especially because, the policy had not yet been approved, and thus implemented. If the policy had been implemented for the previous nearly two years, it would have been possible to identify improvements in the welfare of migrant workers or in the overall management of labour migration in the country.

Analysis of impact therefore for purposes of this evaluation, focuses on identified changes that emanate from the process of developing the NLMP and not the policy itself as it has not yet been implemented. These are outcome level improvements in knowledge, attitudes and practices by individuals based on observations by the evaluator or, reported (including self-reported), by key informants during interviews. The evaluation also conducted an internet search to identify any documented or reported improved practices in labour migration management in Eswatini. The following are some of the high level results the evaluation was able to gather.

- **A positive migrant/migration sentiment:** This was consistent through out interviews. Interviewed officials in government and outside, portray a very positive attitude towards migrants and labour migration in general. Even among trade unions which in other jurisdictions tend to be wary of migrant workers as they are seen as a threat to local jobs, a positive mentality was observed. At no point did the interviewer perceive negativity in the way labour migrants are perceived. This points to improved attitudes and perceptions which is itself a behavioural change level result. This state may however not necessarily be wholly attributed to the capacity building conducted during the project or other IOM events alone. The country has had a long history of outward labour migration especially into South Africa. The evaluation also established the country has over the years been employing expatriate workers especially in the education sector (teachers) and, in the health sector (doctors and nurses). Mozambican migrant workers were reported to be prevalent in the sugar plantations in the country. Of note is that Eswatini is a major sugar producer in Africa. Labour migration into and out of Eswatini is therefore not a new phenomenon and, that is a factor that may also have a hand in the positive attitude witnessed. Nevertheless, the two years of engagement in this project and in other IOM activities has helped to positively influence attitudes.
- **Enhanced inter-ministerial and stakeholder coordination contributing to a whole-of-government/whole of society approach to migration management:** One key benefit that establishment of a national technical working group brings, is the ground work it lays in bringing migration stakeholders together and, have them work towards a common goal. Through that interaction, new networks and positive working relationships are forged, not only in relation to migration matters, but also that enhance the day to day working relations between different actors. Of note is how the TWG brought together tripartite partners (employers, workers and government), to work towards a mutual cause. One peculiar aspect with this is that, for employers and workers, the project brought together the two umbrella trade unions in the country (TUCOSWA and FESWATU) whose perspectives may not always converge. On the employer's side both Business Eswatini and Federation of Eswatini Business Community who also both represent employers but with a different perspective were brought to sit on the table. Two migrant worker associations (SNEMA and SWAMMIWA) were also brought on board to share the table. This is seen as a good in unifying perspectives for the benefit of migrants.
- **Greater government support/facilitation:** Some stakeholders such as ministry of education and Business Eswatini, expressed their appreciation for the improvements they had witnessed in issuance of work permits or visas for expatriates, especially health care workers in the current COVID 19 crisis. Though this did not come from a wide section of informants, the evaluation regards it as an important development. Both SNEMA and SWAMMIWA migrant associations report greater support by government in following up with South Africa government counterparts to ensure that former Swazi migrant workers receive or access their social benefits. Both organizations report to have had successful follow ups. It was also reported that, the government intervened swiftly and helped stop a recent wave of attacks on Swazi truck drivers while in South Africa. Through the national TB programme, the ministry of health continued to provide TB and Silicosis services (screening, treatment and referral) and, support to claim compensation where TB infection occurred while at work settings. In the overall, stakeholders see a more visible government support to the welfare of migrant workers and, they partially attribute this to the growing awareness and education on labour and migration matters. In both, IOM activities, past and present in the country and regionally has definitely played a role. As reported earlier, the government

has been in the process of considering ratifying key ILO conventions. Indeed, ILO records show that the government has already expressed interest to ratify some key ILO standards under the Decent Work Country Programme⁶.

All these point to improvements in attitude and practice. Impact will nevertheless remain modest at this time given that the policy is yet to be endorsed and implemented. Once implementation sets in, the policy has potential to improve the welfare and quality of life for both outbound and incoming migrant workers. It has provisions that elevate the human rights and entitlements of persons and it also recognizes gender dimensions in the labour migration cycle. Until full implementation of the policy happens, impact from this project remains limited. Next, are select verbatim statements from key informants when asked about what effect participating in the process brought about, in their lives as individuals and/or, in the institutions they represented.

"The process changed the way I view migrants"

"It broadened the minds of people. I personally learned that we need to value those who migrate. They go through a lot. That stress is too much as you are outside your comfort zone"

"We now look carefully on the labour skills we have and need as we now have some capacity. Before we didn't mind"

"We now see that people going out also gains the country not just their families. Those coming in also benefit us"

"Before I attended this...became part of the TWG, my perspective was so narrow but with the training, that expanded my scope of thinking in regard to migration"

"We were working in silos on issues of migration. This policy brought us together"

"I learned the definition of migration. It was so narrow...to me, I thought a migrant is simply someone who works in the mine. I also discovered other laws that are in the country that I did not know they exist"

"I picked up a number of things...I realized that there is a relationship between migration and development"

"The process also highlighted the various gaps they have in terms of related policies to achieve some form of coherence"

4.6. Sustainability

Evaluator Rating on project Performance against Criteria:

Poor

In assessing sustainability, the evaluation considered a number of factors as follows:

1. The current status of the policy and actions taken towards its approval relative to the time passed
2. The status of implementation of the Roadmap for implementation of the NLMP
3. Status and functionality of the Technical Working group(TWG) in the post project period
4. Sustaining acquired knowledge and expertise

The draft policy was validated in a stakeholders workshop on 1-2 July 2019. Thereafter the draft was officially handed over to the MOLSS to process it further through the relevant approval protocols culminating in its adoption by the cabinet. One year and 11 months have passed since the validation and official handover. Unfortunately, the evaluation established that the policy had not made much progress towards approval(or

⁶ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:4022740

not). It was reported that the draft was indeed shared with the MOLSS Permanent Secretary who advised on the need for more consultations and review. The COVID 19 crisis in 2020 also negatively impacted on the progress as for most time, all government offices were closed and meetings were also prohibited. It was noted that the previous minister of labour, who was also a key advocate passed away and this may have impacted on the process too.

The evaluation established that, one briefing session was held with the Parliament's Portfolio committee on Labour. However the organizers themselves(MOLSS and IOM) felt that they did not achieve the intended objective due to time constraints in that meeting . A number of actions still remain to be done including,

1. Organize another briefing to National Assembly portfolio committee to fill in the gaps identified in the first briefing
2. A similar briefing to the Senate's house portfolio committee on labor may also need to be organized
3. Organize another larger validation workshop with an expanded stakeholder representation(the mission confirmed their intention to support this further consultation)
4. Incorporate new acquired feedback into the policy document
5. Present draft to be discussed and endorsed by the Labour Advisory Board(a tripartite body that consists of employers, trade unions and government)
6. Submit to Cabinet for adoption
7. If adopted, promulgate the policy officially for example through official gazette

As it can be seen, there is a lot that still needs to be done, but was unfortunately not accomplished in the last about two years. Though, COVID 19 may have played a role in the lull, some stakeholders feel that there wasn't sufficient follow up to ensure faster progress. Stakeholders feel and urge IOM to play a more proactive role in following up especially by, engaging at the highest levels(Minister, Permanent Secretary and Commissioner of Labour levels), to ensure that the policy remains a priority and within radar. With the policy not been endorsed, that also affects its Roadmap for implementation. It is not officially implemented though as discussed earlier under effectiveness criteria, the evaluation identified a modest number of initiatives already underway, that correspond with some of the activities listed in the Roadmap.

In terms of the functionality of the TWG, the evaluation finds that its function technically ended with the validation workshop in July 2019. The committee had not met ever since to discuss or track the progress made so far. The reasons given by former TWG members was that, the remaining portion of work, was the mandate of the MOLSS to process the policy within its internal chain of endorsement. While this being a fair assesment, it reveals an important weakness in relation to sustainability: terms of reference and longevity of the TWG.

It was not created as a standing committee to jointly coordinate labour migration and especially oversee and track implementation of the policy in a whole-of-government approach. This does not seem to have been a perspective given consideration at the time, and so the TWG is no longer functional or at best, even if it was to continue, it has not met since its last meeting in June 2019. The draft policy itself projects the need for a similar interministerial/multistakeholder structure to provide strategic guidance in implementtaion. If the policy had been endorsed, perhaps this structure would have been in place, but given that the policy is not yet in force, it implies an institutional sustainability gap (looking at it from a whole of government perspective). It would have been value adding to keep the TWG active to some extent, upto and until the policy is adopted, and then dissolved and reconstituted in the version envisaged by the policy.

In terms of knowledge, it is worth noting that most of those trained were still in government and so these capacities are still available and can be harnessed if necessary. Indeed as discussed earlier in this report, those who actively participated in this project have continued to be shining lights in terms of their perception on migration. This is an aspect of sustainability that has been sustained so far. There are however some risks. The foremost risk is that, a number of those trained including TWG members had been transferred to other ministries or departments, with a much less direct role in labour migration. This means they may increasingly

lack opportunities to apply acquired knowledge, and eventually it may fade and/or stop influencing their behavior and practice(hypothetically speaking). It is therefore imperative that former TWG members are constantly engaged and consulted in current and ongoing labour and migration initiatives to maintain their interest in the field and, to continue sustaining their knowledge and awareness, that would in turn sustain behaviour.

Going by the current state of play, especially regarding the little TWG activity in the post project period, and the relatively limited progress made towards the policy endorsement in the post validation period, the evaluation does find some key risks to sustainability thus the poor score above. IOM has an interest in seeing this come to fruition, and in the last about two years, perhaps more could have been done; perhaps more vigorous and more frequent follow ups to unlock progress and increase the prospects for this work. Though stakeholders understand that the MOLSS has the leading role, they view IOM's technical expertise and "political" influence as pivotal to ensuring that the policy advances to the next level. Interviewed MOLSS officials themselves did voice that request for IOM's "intervention".

Of note is that in the weeks preceding this evaluation, IOM through the Regional Director who was on official visit did support the country mission to follow up this matter in his meetings with key officials in the ministry. IOM Eswatini had also participated in the briefing made to the National Assembly portfolio committee. This evaluation also, having been conducted by the IOM Regional M&E Officer also did play a role in reminding and following up to ensure that the draft policy is given due attention. If more constant follow up and support is provided, there are prospects the policy will be passed especially because all key stakeholders especially those in the tripartite arrangement, and, migrant workers associations express support and satisfaction with the content of the draft policy and the process followed to develop it. Of course, some stakeholders see the value of revisiting the policy to add on any aspects that may have newly emerged or overlooked.

4.7. Appropriateness of Design and Crosscutting issues

Evaluator Rating on project Performance against Criteria:

Very Good

Under this criterion, the evaluation assessed the quality and clarity of the project's theory of change, the vertical and horizontal logic, as well as the mainstreaming of gender and human rights in the project design, implementation and management as well as in monitoring and evaluation.

Theory of change, project logic and implementation approach

The original proposal had to be revised to reflect more clearly the main thrust behind the project and to align it better to the Regional Labour migration project that was ongoing at the time. The revised proposal shows a refocus of the project to a NLMP with a subsidiary objective of advocacy/lobbying for ratification of key regional instruments that are seen as complementary to a NLMP. There is also better articulation of results and indicators. It is a revision that seems to have been value adding.

The project design, both the original and the revised, do not have an explicit enumeration of the project's Theory of Change (TOC). This is perhaps due to the standard proposal format. TOC is rather implicit, and a basic one can be derived from reading the project rationale and results framework. The project was designed from a Log Frame Approach (LFA) perspective and therefore, it outlines more succinctly the main components/building blocks of the project, than the underlying processes(assumptions, drivers of change, and the intermediate conditions or results that must be attained first to achieve the higher level results).

The design does not enumerate how outcome 3 "*Legislatures demonstrate increased understanding of the SADC Free Movement of Persons Protocol and SADC Portability of Social Security Benefits Framework and willingness to advocate towards ratification*" links within the overall framework of the project. This outcome,

without a TOC enumeration would appear as an outlier. In the revised design, the framing of results statements and indicators is relatively clear. The design is strong in choice of indicators especially in terms of number of indicators. Each result statement does not carry an unnecessarily many indicators. Also, for most indicators, staff who worked in the project reported that it was easy to interpret and collect data and that made reporting easier. An exception to this is on output indicator 1.3 (# of consolidated lists of inputs). One staff indicated to have struggled in compiling this information and feels that we should perhaps have counted number of stakeholders contributing rather than the actual inputs as one stakeholder can provide many inputs, multiple times thus making the compilation and counting a complex venture.

In terms of implementation approach, the revised proposal amended the process and brought the NLMP at the centre of the project. The project engaged an external consultant for the policy drafting. The evaluation sought feedback from key informants to gauge their perspective on this approach. All interviewed officials express support for an external consultant. They do not have a problem with that approach as long their inputs are considered. Upon further probing, they also appreciate the value of also utilizing local expertise and especially by working with local academia. There is an appreciation that identifying local experts can also be an asset for the country. Local academia is therefore a key ally the IOM mission in Eswatini can start to engage more in its current and future projects.

Gender and Human Rights Mainstreaming

The design is slightly weak in the explicit enumeration of how gender and human rights dimensions will be factored-in different project processes. Indeed, there are only two references to gender in the revised project proposal and it is in the context of two indicators that would be disaggregated by gender. Some proposed actions however have some implicit benefits for gender for example, the proposal outlines two key aspects of the proposed policy to include "*migrants and their dependents*".

The project final report indicates that efforts were made to ensure gender balance in representation of the TWG. This was however difficult to achieve because appointment to the TWG was based more on the role/function or expertise required in the TWG, than on achieving an equal gender balance. The gender representation of those with the required criteria would therefore inevitably reflect on the TWG. Project records show that the TWG ended up being more female dominated and thus in all the TWG meetings, female members were always more than their male counterparts. The final validation workshop which gathered many inputs from stakeholders was on the other hand, male dominated. The inclusion of the department of gender affairs (under Prime Minister's office) in the TWG was discussed in one of the TWG meetings but the ministries participation was relatively invisible.

IOM Eswatini periodic reports show a consistent effort to provide sex disaggregated data. Reports do not however provide any information on specific gender results that may have been accrued expectedly or unexpectedly. Project processes can produce positive gender outcomes, and these are important results to communicate. For example, a female dominated TWG, though not a planned may have had a positive effect in mainstreaming more migrant women perspectives that are relatively well articulated in the NLMP.

The evaluation ensured that gender and human rights were a key criterion for assessment in its terms of reference. Efforts were made to have reasonable representation from both genders in identifying key informants. The data collection tools developed included specific questions on gender and human rights. The evaluation also intentionally carried out a review of the draft NLMP to analyse the extent of gender and human rights inclusion. Lastly, the internal evaluation data collection team consisted of a male interviewer and a female observer/support staff. This proved particularly useful as majority of key informants who fulfilled the inclusion criteria as enumerated under methodology section earlier in this report, ended up being women.

As mentioned above, though gender and human rights were not visibly reflected in most of the project proposal main sections, there was an aspiration mentioned in the document that the resultant NLMP must be rights based. The proposal states that the proposed policy must include guidance and direction on

“Protection of rights of migrant workers and their dependents”. The evaluation sought to test this by reviewing the policy to see if this aspiration was fulfilled. A review of the draft NLMP shows a strong gender and human rights dimension support by the following;

- The policy is itself anchored on key human rights instruments and it explicitly lists each of those global, regional and national instruments thus giving a rights-based approach due prominence.
- *Human/migrant rights and equality of treatment and opportunity* are listed as some of the guiding principles informing the policy.
- It also lists *“gender sensitive and inclusive implementation”* of the policy as another guiding principle underpinning the draft policy.
- The policy provides the lack of a *“gendered approach to labour migration”* as one gap that provides rationale for a NLMP.
- Lastly, the policy provides disaggregated data where possible and does provide a gender analysis for example under socio-economic context on page 10 of the draft policy, a clear analysis of the situation of women, migrant women and children is provided. However, most data provided under the migration profile chapter is not disaggregated perhaps because the source documents did not have that disaggregation.

As the policy is not yet implemented, there are no specific gender outcomes the evaluation was able to identify as having been brought about by the new policy. The evaluation does however conclude that implementing the policy holds great potential for enhancing the human rights of migrant workers (especially), and, will at the same time assist in fulfilling both strategic gender needs of migrants such as: protection, voice, and enjoyment of ones labour and, practical gender needs such as: an assured income, access to health care services, safe working environment, among others. The policy will also help highlight gender issues in labour migration governance, and thus influence gendered approaches. For example, the evaluation gathered that in the past, labour migration tended to focus more on mineworkers who predominantly tend to be men. The policy development process helped highlight that there were also many Swati migrant domestic workers who should also be covered under the policy. It also highlighted the plight of wives, mothers, and children left behind when men migrate for work.

In concluding, while the IOM design document (the proposal) was relatively weak in articulating gender and human rights perspectives, the foremost product of the project i.e. the draft NLMP is very strong on these aspects. This indicates that the intention and awareness on gender and human rights was there, though not explicitly stated. It also indicates that the consultant had the necessary awareness to ensure a visible human rights and gender perspective. Reflecting on this, and, looking at the reflection presented earlier on the validity of design the evaluation accords an overall *“Very Good”* rating for this criterion in recognition of the good aspects enumerated above, but also acknowledging that there are some areas for improvement.

5.0. Conclusions and Recommendations

5.1. Conclusions

This was an interesting project. It was plagued with implementation delays and under-expenditure but still managed to deliver on its key commitments. The foremost result that every stakeholder acknowledges to be of good quality was the draft policy. Though unfortunate that the policy is yet to be adopted by cabinet, the evaluation, having listened to stakeholders and, having reviewed the document itself, is of the opinion that it has great chances of being approved, when it reaches the Labour Advisory Board and eventually the Cabinet.

The process of developing the policy appears to have been beneficial to all those directly involved. As noted earlier, the evaluator noted a general positive attitude on migration (labour migration) among stakeholders

in government and outside government alike. This is an important capacity in a region where labour migration is lately eliciting negative sentiment, especially among the young unemployed youths, who view labour migrants as responsible for taking away their jobs. This can be exemplified by the occasional xenophobic protests and sentiment in neighbouring South Africa, the latest being media reported attacks targeting foreign long-distance truck drivers witnessed in the early parts of 2021. Participation in the project and in the trainings conducted appear to have equipped involved stakeholders with necessary information that helps them appreciate that labour migration into or out of the Kingdom can be beneficial if well managed and, that this policy presents an opportunity to craft a framework for that better management.

As it stands however, the ball is yet to hit the goal. This project will not have achieved as much as it should if the policy remains un-adopted by the right authorities. By July 2021 when this report was officially submitted, two years had elapsed since the policy was validated. That is a significant time period with little progress. Understandably, the ball is out of IOM's hands and the IOM team in Eswatini may see things to be beyond their sphere of influence. Going by perceptions from stakeholders however, and from the evaluator's own assessment, there is still some influence IOM may still be able to exert into the process. The eventual success of the investment made lies first in this policy's adoption, and then the eventual implementation. There is so much that can spring up after the adoption that benefits the government of the Kingdom of Eswatini, migrants themselves and the IOM mission. All parties stand to benefit and thus it will be a progressive act to push this policy forward.

In the next section, this report presents the key recommendations this evaluation is making in view of all what has been discussed in this report so far.

5.2. Recommendations

1. IOM's more regular and intentional follow up on the status of the policy is needed.

IOM has been engaging the government on this policy but, now that COVID conditions are easing, more regular follow up is needed. It is in IOM's interest to see the eventual success of this work. IOM Eswatini expressed that there is a good working relationship with key government departments and high-level officials including in the MOLSS. It needs to harness this goodwill to influence faster action towards adoption of this policy. The evaluation feels that more constant higher-level engagement (Minister, PS and Labour commissioner) is needed first to clarify areas of the policy they may wish refined further, but also to keep them focused on the goal. This is a policy that can positively transform the labour migration landscape in the country and see Eswatini start benefiting more from a more organized, safe, and regular labour migration into and out of the country. IOM has some influence it can yield, and stakeholders feel so. The mission needs to come up with a plan, a strategy of engagement and push, using all channels available. It is a worthy investment of time and effort in view of the funding injected into this work.

2. Consider aspects of COVID-19, the new normal and the future of work in the context of pandemics.

The policy was developed well before the COVID-19 pandemic. COVID 19 has transformed the workplace and brought to the forefront, some new realities that were not a concern before. The workplace and the conditions under which labour migration takes place will never be the same. Some of the changes we have come to call the new normal will remain for the foreseeable future. New unexpected pandemics may also arise in the future plunging workers (migrant workers in particular) into uncertain conditions such as sudden loss of income, health and psychological distress, and, becoming stranded migrants. Current policies need to mainstream some level of pandemic preparedness. The evaluation therefore supports the plan to revalidate the policy and especially to integrate a COVID-19 and pandemics perspectives. The IOM team in Eswatini also supported by the Migration and health teams at the Regional Office should actively participate in the revalidation processes being planned and, especially with a view to strengthen the aspect of labour migration in the context of pandemics.

3. IOM Eswatini capacity building and coaching on key migration and programming areas.

The IOM mission in Eswatini is staffed by a relatively new staff contingent and as it grows, even more new staff will join. The mission has great potential and the country and government provide a very conducive environment for migration programming. As an example, the Kingdom of Eswatini hosted a very key MIDSA ministerial meeting in 2017 that came up with recommendations that have up to date continued to shape IOM's engagement on migration with member states in the region. The team on the ground needs to achieve all the necessary capacities and adequate staff numbers to provide constant, mission-based support locally, and, more especially to grow the programme portfolio. There is therefore opportunity to beef up staff capacities in different strategic areas and equip the team with all the tools necessary to provide technical support without necessarily relying on the regional office. The evaluation feels that equipping staff in the following areas will bear dividends for the mission in the coming years. These are in no particular order.

- a) Project development and resource mobilization strategies: To enable greater capacity to write proposals and engage donors at country level given that there is still donor interest for Eswatini. The mission has great potential to grow because of this and a government that is easy to work with.
- b) Project monitoring and evaluation methods and results reporting: To enable the team to develop effective project level M&E regimes that can track and measure results, boost results-based management, enhance timely project delivery and appropriate budget consumption rates. It also builds their capacities for communicating results in reporting.
- c) Finance and operations management: To build familiarity with standard finance and operations practices and ensure compliance to IOM finance and operations policies and procedures.
- d) Strategic advocacy and high-level engagement skills: IOM's work requires engagement at all levels. IOM teams tend to engage mostly at the technical levels of government. There is need to also equip staff on strategies and methods of engagement at policy and decision-making levels. There is no doubt this requires a higher skill set and tact, and thus such capacity building is useful. This can be done through coaching. For example, when a high-ranking official from the regional office or other IOM offices visits the mission for high level meetings, he/she can go along with a staff member in an intentional mentorship process.

4. Resource mobilization and new project development on labour migration

There is need for continuity on the labour migration theme. There is tendency to perform a single type of project and drop the idea for other types of projects. IOM projects therefore sometimes tend not to build onto each other and benefit from cumulative impact with time. This is based on the evaluator's own experience evaluating multiple projects in the region. Though the roadmap for implementation of the Eswatini NLMP is not endorsed yet, there are feasible and acceptable activities listed there that IOM can already start mobilizing resources for follow up programmes. Here are a few examples taken from the Roadmap: *Capacity building within major institutions that are relevant to labour migrants; Develop programmes for returnees from across all sectors; provide technical support in analysing data already collected through Census, surveys and administrative sources; Organize information sessions for workers abroad in collaboration with trade unions and employer's federations; Conduct awareness campaign to prevent trafficking and forced labour; support efforts that provide health services to migrant workers among others.* There is a lot to be done just in the labour migration sector and so it helps to carry out a portfolio of directly interrelated interventions that are at scale to achieve significant and visible impact.

These are some of the suggestions that IOM Eswatini may consider going forward based on learnings and reflections from this evaluation exercise. The evaluator has used information acquired from interviews, from literature review and own experiences having evaluated similar IOM projects in the Southern Africa region, to come up with the above conclusions and recommendations. The evaluator notes the dedication and commitment of IOM Eswatini staff and appreciates the support and cooperation accorded to this *expost* evaluation exercise by government and non-government counterparts who provided key information. It is the evaluator’s sincere hope that what was started will soon reach its anticipated climax and usher a new era for labour migration governance in the beautiful Kingdom of Eswatini.

6.0 Annexes

6.1. Evaluation Terms of Reference

TERMS OF REFERENCE
FOR THE EXPOST EVALUATION OF THE
STRENGTHENING LABOUR MIGRATION MANAGEMENT IN ESWATINI PROJECT

Project Identification:	Project Code LM.0305
Executing Organization:	International Organization for Migration (IOM)
Project Management Site and Relevant Regional Office	IOM Country Office, Mbabane/Eswatini IOM Regional Office, Pretoria. South Africa.
Donor	IOM Development Fund
Project Period and Overall Duration:	01-01-2017 - 30-06-2019 (30 months)
Geographical Coverage:	Eswatini
Project Beneficiaries:	Ministry of Labour and Social Security
Project Partner(s):	Ministry of Labour and Social Security, SWAMMIWA, Federation of Business Community (FESBC), Ministry of Natural Resources and Energy, General Statistical Office, Federation of Swaziland Trade Unions (FESWATU), Ministry of Home Affairs (Immigration and Refugee departments), Federations of Swaziland Employers and Chambers of Commerce, and Save the Children
Total Funding Received :	USD 150,000

1. BACKGROUND OF THE PROJECT/PROGRAMME

The overall objective of this project was to support the Ministry of Labour and Social Security of Eswatini towards implementing labour migration programmes within the framework of the Southern African Development Community (SADC) Labour Migration Action Plan (2016-2019), SADC Regional Labour Migration Policy Framework, and Article 19 of the SADC Employment and Labour Protocol stipulating provisions on the Protection of Migrant Workers

The International Organization for Migration (IOM), in partnership with the Ministry of Labour and Social Security, aimed to achieve this objective through the following three outcomes: i) The Government of

Eswatini (GoE) demonstrates increased capacity on labour migration management; ii) GoE bilateral engagement on labour migration management with a country of destination is strengthened including labour exchange programme through the bilateral labour agreement; and iii) GoE has improved the implementation of the national labour migration policy through the implementation of the national labour migration policy action plan.

2. OBJECTIVES OF THE EVALUATION

The purpose of conducting this ex-post evaluation is to assess the relevance of the project to its stakeholders and beneficiaries, coherency, the effectiveness and efficiency of project management and implementation, the expected impact, how well were cross-cutting themes of human rights and gender mainstreamed in the project, and if the desired effects are sustainable, and/or have the prospects of sustainability, (following the DAC evaluation criteria¹).

The evaluation aims to promote transparency and accountability which will, in turn, assist the Fund in its decision-making and to better equip staff to make judgments about the project and to improve effectiveness where possible and with regard to future project funding. Concerning the expected use of findings, the ex-post evaluation aims to also identify lessons learned, good practices, and provide a learning opportunity for the Fund and its implementing partners with regard to the project formulation process. The findings will also help make evidence-based strategic decisions in relation to specific projects, while also demonstrating the Fund's on-going commitment to results based management.

The specific objectives of the evaluation will include the following:

- ✓ Assess the relevance of the project's intended results;
- ✓ Assess the relevance of the Theory of Change and design of the results matrix and the extent to which the objective, outcomes and outputs are well formulated; the indicators were SMART and baseline and targets appropriate;
- ✓ Assess the coherence of the project with IOM's activities and other interventions in the sector;
- ✓ Assess the extent to which the needs of stakeholders and beneficiaries were taken into account during project design and if the project is aligned with national priorities and strategies, government policies and global commitments
- ✓ Assess the effectiveness of the project in reaching their stated objectives and results, as well as in addressing cross-cutting issues such as gender, human-rights based approach, etc.;
- ✓ Assess the efficiency and cost-effectiveness of project implementation, along with regular progress monitoring of project resources and if the costs were proportional to the results achieved;
- ✓ Assess the impact prospects and outcomes to determine the entire range of effects of the project (or potential effects) and assess the extent to which the project have been successful in producing expected change;
- ✓ Assess the sustainability of the project's results and benefits (or measures taken to guarantee it) or prospects for sustainability, and if these benefits generated by the project still continued once external support ceased;
- ✓ Assess how effectively issues of gender equality and human rights protection were mainstreamed in the process of project design and during project implementation;
- ✓ Identify lessons learned and best practices in order to make recommendations for future similar projects and help the Fund in its decision-making about future project funding.

3. EVALUATION CRITERIA AND QUESTIONS

This final evaluation will assess the completed project against the following criteria:

Relevance

- ✓ *Was the project design responsive to the needs and priorities of the project's key stakeholders?*
- ✓ *Were stakeholders involved in the formulation of project objective and outcomes?*
- ✓ *Is the Theory of Change suited for the context, responsive to the identified challenge(s), and logically linked?*
- ✓ *Did the project design sufficiently take cross-cutting issues such as gender into account?*

Coherence

- ✓ *What, if any, is the added value of the project?*
- ✓ *Were there any synergies and interlinkages between the project activities and other interventions carried out by the local institutions/government agencies/INGOs/NGOs and other actors implementing similar activities in the area?*
- ✓ *To what global, regional or national level norms, standards, instruments and frameworks does the project align to? How do they impact on the project and how does the project impact on these?*

Effectiveness

- ✓ *Are the quality and quantity of the produced results and outputs in accordance with the approved results matrix?*
- ✓ *Did project activities lead to production of outputs as originally envisaged?*
- ✓ *Are outputs/products brought about by the project being utilised by the GoE and/or other partners to contribute to outcome or impact level results in the long run?*
- ✓ *What factors enabled or hindered the effectiveness of the project to deliver envisaged activities and outputs?*

Efficiency

- ✓ *Were the project expenditures utilized appropriately and/or as planned?*
- ✓ *Does an assessment of the project results against the human, financial and time investment to the project show value for money? Was human and financial resource allocation and management optimal for the nature of the project?*
- ✓ *Were activities implemented on time as planned and carried out in a well-organized fashion?*
- ✓ *How well did the Partner Contribution/Involvement work?*
- ✓ *Were challenges in project implementation addressed swiftly and appropriately?*

Impact

- ✓ *Does any evidence exist that significant contribution was made towards the long-term outcome and overall objective results? Do indicators show significant progress towards achieving the project's higher-level objectives?*
- ✓ *To what extent does/will the project have any indirect positive and/or negative impacts? (i.e. environmental, social, cultural, gender and economic)*

Sustainability

- ✓ *Do stakeholders indicate that project outputs and built capacities will be used in future?*
- ✓ *Are the conditions in place for the project products and results to continue after the intervention has finished (financial, institutional, legal, technical and political)?*
- ✓ *Are there indications that the benefits generated by this project continue once external support ceases?*
- ✓ *What efforts or mechanisms did the project put in place to boost sustainability of results in the long term?*
- ✓ *How this project was interlinked with other IOM continuing initiatives?*

4. METHODOLOGY

An evaluation framework will be developed and focus on the standard DAC criteria and cross-cutting themes criteria, supported by standard tools. The evaluation will be conducted physically in Eswatini but observing key COVID 19 control measures and take a participatory approach involving and consulting with the relevant stakeholders in the different steps of the evaluation and integrating this approach into the methodology as far as is feasible.

This will be a qualitative research enquiry and it will draw on the following methods in gathering relevant data:

a. Document review

Relevant documentation will be reviewed, including the project document, periodic reports, midterm review reports (if available), specific meetings or training reports, published documentation etc.

b. Key informant interviews

Face-to-face interviews will be conducted with key actors who actively participated in the design and/or implementation of the project including but not limited to IOM project staff in country and regional level, members of the national working group, other relevant actors at country level. A full list will be developed jointly between the evaluator and country team

Findings will be used to assess the achievements of results as articulated in the Results Matrix, both numeric and descriptive results and used to rate the project as a whole according to the assessing evaluation criteria, see table below for further explanation.

Overall performance score for each evaluation criteria	Criteria for defining the performance score rating
Excellent (Always)	There is an evidence of strong contribution and/or contributions exceeding the level expected by the intervention.
Very Good	There is an evidence of good contribution but with some areas for improvement remaining.
Good (Mostly, some with some exceptions)	There is an evidence of satisfactory contribution but requirement for continued improvement.
Poor (Sometimes, with many exceptions)	There is an evidence of some contribution but significant improvement is required.
Very Poor (Never or occasionally with clear weaknesses)	There is low or no observable contribution.

5. REPORTING

Following all desk and field research, a final report will be drafted and shared with colleagues and stakeholders (if possible) for comments. The draft document will be submitted to IDF, the country mission, regional office and any other relevant stakeholders for inputs and comments. The final report and evaluation brief will be submitted to IDF, the country mission and the regional office for filing with OIG Evaluation office.

6. LIMITATIONS AND PROPOSED MITIGATION STRATEGIES

The following limitations have been identified with accompanying mitigation strategies to minimize the impact described, where possible. If it is not possible to fully rectify the limitations identified, findings will

have to be reached based on partial information. Where this occurs, the evaluation will seek to be transparent about the limitations of the evaluation and to describe how these may have affected the overall findings, conclusions and recommendations.

- (a) The context of COVID-19: The timing of the evaluation during the COVID-19 pandemic response will likely impact on the availability of IOM staff and project stakeholders/ beneficiaries, and/or extend the time it will take to respond to the evaluation request and provide inputs.

Mitigation strategy: Early and close involvement of the project manager and former project managers to help coordinate meetings and ensure availability of key stakeholders. Interviews will take place remotely over a period of 6 weeks and will allow for an extended interview period to compensate for the disruptions caused by COVID-19.

- (b) General problem of insufficient data or insufficient representative data collected, owing to poor response rate from interviewees.

Mitigation strategy: Triangulation with other data gathering tools from different sources will help address data gaps.

- (c) Objective feedback– interviewees may be reticent to reveal the factors that motivate them or any problems they are experiencing or being transparent about their motivation or about internal processes.

Mitigation strategy: Anonymizing sources and ensuring interviews are conducted on a one to one basis in confidentiality can help address issues of reticence.

- (d) General bias in the application of causality analysis

Mitigation strategy: Judgements will be informed by the team and all findings will be reviewed jointly, as well as by the project manager and the main evidence for ratings will be described.

7. EVALUATION TEAM & RESPONSIBILITIES

This internal evaluation will be carried out by the Regional M&E Officer. The respective RTS for labour migration at the regional office will also actively participate in the evaluation as a subject matter specialist to advise on technical thematic aspects and in data collection as may be feasible. He will provide technical inputs to the evaluation ToRs, data collection plan and tools as well as the draft evaluation report. The IDF team as well as OIG evaluation staff will be requested also to provide input to the ToRs and the draft report.

The in-country IOM team will provide logistical support including but not limited to arranging in-country transport and related logistics for the evaluator, arranging for and facilitating appointments for interviews or discussions with key respondents that have been identified as necessary for the evaluation, provide review comments to tools and draft report as well as provide all required documentation and information for the successful data collection. The in-country team will provide a management response to the final report and submit it to IDF/OIG.

8. WORKPLAN

Phase 1 – Inception: An initial meeting with the project manager to discuss the evaluation framework, identify stakeholders and to ensure involvement and ownership from the start. From this, a methodology, timeline, standard tools and evaluation approach has been developed and detailed in the inception report (this document).

Phase 2 – Data collection: During the second phase of the evaluation field work will be undertaken. Interviews will be conducted by in person where possible and virtually where applicable. At the time travel

into the country and holding group meetings with a restricted number of people is allowed as long as other accompanying prevention protocols are observed i.e. hand sanitizing, social distancing and face masks.

Phase 3 - Report writing: During the final phase collected data will be analyzed and a report drafted for validation. The results of the evaluation will be disseminated by means of the report.

9. RESOURCES AND TIMING

Expenses for this evaluation will be covered through the budgeted expenses in WBS number MK.0047.ZA10.57.02.002 in the maximum amount of **USD 3,000** to cover DSA and Travel Costs.

Though the evaluation team will prepare and discuss with the project team a detailed work plan with specific dates for the evaluation, it is planned that this evaluation together with all related processes i.e. data collection, analysis and reporting will be carried out between **May and June 2021**.

10. DELIVERABLES

The evaluation main deliverables will be:

- An Evaluation Execution Plan/brief to guide project teams on the methodology, tools, and logistical preparations that will need to be done in advance of the in-country visit.
- A draft evaluation report utilizing IOM's standard Evaluation Report format.
- A final report and evaluation brief (in the same format above incorporating feedback and comments from RTS, IOM in country staff, IDF and any other relevant source.



6.2. Evaluation matrix

Eswatini LM 0305 Evaluation Matrix					
Criteria	Main evaluation Question(s)	Subquestions	Indicators	Data Source	Method
Relevance	Was the project design responsive to the needs and priorities of the project's key stakeholders?	How was the need/gap identified and who was involved? Do stakeholders feel that this was a priority need and why? Did the need continue to be a priority throughout the implementation phase?	List of key gaps/needs Evidence of government request or buy in	Project stakeholders; Project staff; project documents	Interviews; project documents' review
	Were stakeholders involved in the formulation of project objective and outcomes?	Who was consulted during inception and design stage? What role did specific stakeholders play?	Enumeration of stakeholders engaged and roles each played	Project stakeholders; Project staff; project documents	Interviews; project documents review
Validity of design and integration of gender and human rights	Is the Theory of Change suited for the context, responsive to the identified challenge(s), and logically linked?	Does the project have an explicit theory of change? Were results and indicators properly articulated in line with IOM/IDF projects guidance? What do stakeholders feel about the implementation approach used esp. use of an external consultant?	Articulation of TOC; quality of results statements and indicators; feedback on use of external consultant to write the policy?	Project document	Document review
	Design validity: To what extent were cross cutting themes integrated in design and implementation, in the draft policy and what outcomes if any have been realised?	What specific gender and human rights considerations are envisaged in the project proposal and accompanying documents? How was gender and human rights equality practically applied in implementation, M&E and reporting? What results if any in gender and human rights can be attributed to the project?	Both explicit and implicit gender and human rights references in project documents; list of actions taken to uphold gender and human rights; list of any gender/human rights results(+/-), intended or not	Project stakeholders; Project staff; project documents	Interviews; project documents' review
Coherence	What, if any, is the added value of the project?	In the broad migration management continuum, what specific gap does the project fill? How was the project a best fit?	An analysis of migration data a key part of improved migration management	Experts in government, IOM and other; Published documents	Interviews and literature review
	Were there any synergies and interlinkages between the project activities and other interventions carried out by the local institutions/government agencies/INGOs/NGOs and other actors implementing similar activities in the area? How does it link with established norms, standards, and frameworks?	Who else is also involved in migration data and how did the project coordinate to avoid duplication? To what policies, strategies and frameworks does the project align to at national, regional and global?	list of other actors in migration data; evidence of coordination; List of relevant policies, strategies, frameworks;	Project stakeholders; IOM staff; project documents	Key informant interviews; document review
Effectiveness	Are the quality and quantity of the produced results and outputs in accordance with the results matrix? What does indicator data tell us on the performance of the project?	How do stakeholders feel regarding the quality of final product and the process used? What is the performance level on each output area?	Stakeholder feedback; list of expected deliverables versus what was achieved	Project stakeholders; IOM staff; project documents	Key informant interviews; online survey; document review
	Did the outputs/products contribute towards Outcome level results as envisaged in the project documents?	What higher level changes have been observed or can be observed during the evaluation process? How do we know it is because of the project?	Reported or direct observations pointing to improved practices, changed attitudes and behaviors or, institutional performance	Project stakeholders; document/literature review	Direct observations during interviews; document review; key informant interviews
	What factors enabled or hindered the effectiveness of the project to deliver envisaged activities and outputs	What drove success? What challenges were experienced that hindered success or effectiveness?	List of identified enablers and hindering factors	Project staff; TWG members; project reports	Key informant interviews, document review
Efficiency	What is the project's performance relative to the time and resources available?	Were the project expenditures spent as planned? Were activities implemented in a timely manner as represented in the projects work plan? What factors enabled or hindered timely implementation?	Acceptable final burn rate and timely project delivery; appropriate justification for any delays;	IOM staff; project documents	Key informant interviews; document review
	What is the evaluation's assessment in regard to value for money and cost effectiveness?	Does an assessment of the project results against the human, financial and time investment to the project show value for money? Was human and financial resource allocation and management optimal for the nature of the project?	An analysis of resource allocation for the project, budget allocation across staff, office and operations	IOM staff; project documents	Key informant interviews; document review
	What does the evaluation show about the strengths and weaknesses of the project's internal project management and coordination processes?	How was coordination done (internally) and externally and how did this contribute or hinder successful implementation of the project? What do stakeholders feel about the quality of IOM's coordination? Did the project management pay attention to all aspects of project management (strategic & operational planning, monitoring & control, reflection & learning, reporting & accountability; people & resources management; communication & information sharing; documentation and knowledge management etc);	Feedback from stakeholders on how IOM performed its roles	IOM staff; project stakeholders; project and IOM documents	Key informant interviews; document review
Impact	Do indicators show significant progress towards achieving the outcome level and contributing to the overall Objective?	What lasting changes has the project brought so far? How do we know it is because of the project?	Perceptions of impact on individuals, communities and institutions	IOM staff; project stakeholders; project and IOM documents	Key informant interviews; document review
	What are the major factors influencing the achievement of longterm results?	What would hinder or facilitate optimal contribution to higher level results?	Perception of risks and enabling factors that would enable or hinder realization of results in the longrun	IOM staff; project stakeholders; project and IOM documents	Key informant interviews; document review
	To what extent does/will the project have any indirect positive and/or negative impacts? (i.e. environmental, social, cultural, gender and economic)	Has the policy been implemented? What has changed in any sphere of life (environmental, social, cultural, economic etc) that can be attributed wholly or in part to this project? How do we know that this project played a role?	Perception on attribution of impacts to the project	IOM staff; project stakeholders; project and IOM documents	Key informant interviews
Sustainability	To what extent was a sustainability focus integral to the design and implementation of this project?	Did the project management put in place mechanisms to sustain the results from the project? Are those mechanisms working?	Evidence that the profile is being used; institutional arrangements created during the project are still active; stakeholder initiatives e.g. resource allocation	IOM staff; project stakeholders; project and IOM documents	Key informant interviews; document review
	Looking at the time between project closure and this evaluation, does the post project actions by stakeholders indicate some acceptable level of ownership and continuity?	What is the current status of the draft policy validate din June 2019? What activities in the NLMP Roadmap for implementation have so far been implemented? What does the current status say about sustainability prospects of the project?	Update on current status of the policy? One by one status update for each activity on the Roadmap	IOM staff; TWG members especially MOLSS; project and IOM documents	Key informant interviews; document review

6.3. List of documents reviewed

1. IOM Eswatini Project Proposal. Submitted to IOM Development Fund (IDF)
2. IOM Eswatini periodic Progress Reports
3. IOM Eswatini Final Project Narrative submitted to IDF and to Eswatini representation in Geneva
4. Final Financial Report submitted to IDF and to Eswatini representation in Geneva
5. Eswatini Draft Labour Migration Policy document
6. Draft NLMP Roadmap for Implementation
7. Attendance register for the NLMP Consultative and Validation workshop
8. Eswatini labour force survey questionnaire
9. Eswatini Census questionnaire
10. Eswatini LMIS
11. Media reports on labour migration issues in Eswatini

6.4. List of persons interviewed or consulted

	Ministry/Department/Organization Represented	Full Name and title	Gender [M=14; F=14]
1.	Ministry of Education (Statistics Unit)	Ms. Nelisiwe Dlamini Statistician	Female
2.	Ministry of Education (Planning Unit)	Mr. Bavukile Dlamini Planning Officer/Economist	Male
3.	Save the Children International	Mr. Thabo Magagula Child Protection Lead	Male
4.	Business Eswatini	Ms. Khanyisile Dlamini Head of Industrial Relations/Company Secretary	Female
5.	Ministry of Labour and Social Security	Ms. Nomsa Silenge Senior Labour Inspector (TWG Chair)	Female
6.	Ministry of Labour and Social Security	Mr. Douglas Dlamini Senior Labour Officer	Male
7.	Ministry of Labour and Social Security (Statistics Unit)	Ms. Thandi Dlamini Statistician in charge of Migration Statistics	Female
8.	Ministry of Health (National TB Programme)	Ms. Philile Mndzebele TB DOTS Coordinator	Female
9.	Trade Union Congress of Swaziland (TUCOSWA)	Mr. Muzikayise Mhlanga Deputy Secretary General	Male
10.	Trade Union Congress of Swaziland (TUCOSWA)	Mr. Musa Ngubeni Research and M&E Coordinator	Male
11.	Trade Union Congress of Swaziland (TUCOSWA)	Ms. Mpumelelo Dlamini Deputy Organizing Secretary	Female
12.	Refugee Department	Mr. Wandile Bhembe Deputy Refugees Commissioner	Male
13.	Immigration Department	Ms. Nozipho Nkhwanyana Senior Immigration Officer (Production Section)	Female
14.	Immigration Department	Mr. Siphohle Mohale Senior Immigration Officer	Male
15.	Federation of Eswatini Small Business Community (FESBC)	Ms. Duduzile Nhlengetfwa Former Executive Director	Female
16.	Ministry of Natural Resources	Ms. Tiphonkhe Makama Principal HR Officer	Female
17.	Swaziland Migrant Mineworkers Association (SWAMMIWA)	Mr. Vama Jele General Secretary	Male
18.	Swaziland National Ex-Mine Workers Association (SNEMA)	Mr. Mdluli General Secretary	Male
19.	Federation of Swaziland Trade Unions (FESWATU)	Ms. Phendulile Zikalala Secretary General	Female

20.	Ministry of Foreign Affairs and International Cooperation	Mr. Sihle Khumalo Assistant Social-Political Affairs Analyst	Male
21.	Ministry of Youth	Mr. Mangaliso Simelane Sports Officer	Male
22.	Central Statistics Office	Ms. Nolwazi Dlamini Statistician-Demography and Vital Statistics	Female
23.	IOM Eswatini Country office	Mr. Jeremias Mendes Head of Office/Project Manager	Male
24.	IOM Eswatini Country office	Ms. Fezile Shongwe Finance and Admin Assistant	Female
25.	IOM Eswatini Country office	Ms Thembie Matsenjwa Project Support Assistant	Female
26.	IOM Eswatini Country office	Mr Ndumiso Mkaliphi Project Support Assistant	Male
27.	IOM Regional office for Southern Africa	Ms Neischa Macaringue Former Head of Office & Project Manager	Female
28.	IOM Regional office for Southern Africa	Mr Jason Theede Regional Thematic Specialist: Labour and Human Development	Male

6.5. Data collection instruments

ESWATINI LABOUR MIGRATION PROJECT

Key Informant Interview Guiding Questions: Stakeholders

Relevance

- ✓ As you know, any intervention seeks to fill a certain gap or solve an identified problem or need. In your opinion what gaps or needs existed at the time this project was started that warranted a labour migration policy? **[Probe to ascertain KIs perception of need].**
- ✓ How were those needs identified as far as you know and as a ministry or organization, how much of a priority was a labour migration policy to you?

Coherence

- ✓ Looking at all the stakeholders who played a critical role in the policy development process, do you feel that there some critical ones who could have been much more engaged in the process? What value would each of these bring? **Briefly explain.**
- ✓ In your opinion to what extent did this initiative harness the expertise, mandate or comparative advantages that different stakeholders in the country possess? **Briefly explain.**
- ✓ From your understanding, which policy and legislative frameworks in the country or regionally or globally does the labour migration policy complement? **[list as many as possible]**

Crosscutting themes and Validity of design

- ✓ Gender and human rights are critical for our projects and we seek to see these mainstreamed in project processes. What specific examples do you have that demonstrate that a gender and human rights dimension was part and parcel of what the project was doing? **[probing necessary to get specific examples]**
- ✓ Looking at the approach used for implementation, do you feel that it was the most appropriate and effective? Please **briefly explain.**
- ✓ Did you feel like the target results of the whole process were clear to you? And to other stakeholders? **Briefly explain.**
- ✓ From your experience with this Labour migration policy development process, what lessons can you share with others developing similar policies?

Effectiveness

- ✓ From what you know what are the main achievements made through the labour migration development process? **(probe)**
- ✓ Reflecting on the whole process, what aspects do you feel were well done and which ones do you feel could be done better?
- ✓ What factors would be behind each of the positive and negative aspects you have just mentioned?

Impact

- ✓ What major changes in regard to labour migration management in the country have you observed so far that you can attribute to the LM policy or its development process? **[Probe to ascertain any connection with the project]**

Efficiency

- ✓ Implementation efficiency: According to you were the key targeted products of this process delivered in a timely manner? **Explain briefly.** What enabled or hindered timely delivery from what you know?
- ✓ Coordination efficiency: How do you view IOM's coordination capacity and performance? What did IOM do well, what could IOM have done better? **[probe for more]**

Sustainability

- ✓ Since finalization of the labour migration policy, please tell me how you or your ministry or organization has used it?
- ✓ Looking at the road map developed to guide implementation, kindly identify for me activities that have been implemented by your ministry/organization or by any other stakeholder so far, that you are aware of. **[Provide a copy of the implementation plan]**
- ✓ What could hinder stakeholders from implementing this plan?

We have come to the end of our interview. Do you have any additional information you may wish to give me? Do you have any questions? Thank Key Informant for their time and inputs.

ESWATINI LABOUR MIGRATION POLICY PROJECT

Key Informant Interview Guiding Questions: IOM/project staff

Relevance

- ✓ As you know, any intervention seeks to fill a certain gap or solve an identified problem or need. From what you know what gaps or needs existed at the time this project was started that warranted a labour migration policy? **[Probe to ascertain KIs perception of need].**
- ✓ How were those needs identified? Who was consulted?

Coherence

- ✓ Looking at all the stakeholders who played a critical role in the policy development process, do you feel that there some critical ones who could have been much more engaged in the process? What value would each of these bring? **Briefly explain.**
- ✓ In your opinion to what extent did this initiative harness the expertise, mandate and comparative advantages that different stakeholders in the country possess? **Briefly explain.**
- ✓ From your understanding, which policy and legislative frameworks in the country, regional and global does the labour migration policy complement? **[list as many as possible]**

Crosscutting themes and Validity of design

- ✓ Gender and human rights are critical for our projects and we seek to see these mainstreamed in project processes. What specific examples do you have, that demonstrate that a gender and human rights dimension was part and parcel of what the project was doing? **[probing necessary to get specific examples]**
- ✓ Reflecting on the approach used for implementation, do you feel that it was the most appropriate? What changes would you make for future similar processes in Eswatini?
- ✓ Did you feel like the framing of the results, indicators, targets and activities were clear to you? **Briefly explain.**

- ✓ From your experience with this Labour migration policy development process, what lessons can you share with others developing similar policies?

Effectiveness

- ✓ What according to you are the most significant deliverables that the project realised and why do you consider them significant? **(probe)**
- ✓ What enabled you to make the achievements you have enumerated?
- ✓ Reflecting on the whole process that ensued and from your experience, what would you do again (i.e. replicate), and, what would you change in a future similar project?

Impact

- ✓ What major changes in regard labour migration management in the country have you observed so far that you can attribute to the LM policy or its development process? **[Probe to ascertain any connection with the project]**

Efficiency

- ✓ What were the main reasons behind the delayed finalization of the project?
- ✓ What would you do differently to avoid similar delay in future similar projects?
- ✓ For Project manager and Head of office: In terms human resource allocation, how many staff members were allocated to this project?
- ✓ For individual staff members: how many other projects were you also coordinating or implementing? Did this have any effect on this project's delivery?
- ✓ What is your assessment of the appropriateness of the originally planned project lifetime and of the level of resourcing?

Sustainability

- ✓ Since finalization of the labour migration policy, and from what you know, please tell me all the ways in which the LM policy has been used?
- ✓ Looking at the road map developed to guide implementation, kindly identify for me activities that have been implemented so far. What is your overall assessment on the level of implementation so far? **[Provide a copy of the implementation plan]**
- ✓ What could hinder stakeholders from implementing this plan?
- ✓ What is IOM doing to support implementation of this plan?

We have come to the end of our interview. Do you have any additional information you may wish to give me? Do you have any questions? Thank Key Informant for their time and inputs.



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