

**Independent Evaluation of IOM Project:
Ensuring a comprehensive approach to address
smuggling and trafficking in Egypt
including Egypt's Sinai Peninsula**

Submitted by Martina Melis

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Acronyms and Abbreviations

ECAST:	'Ensuring a comprehensive approach to address smuggling and trafficking in Egypt, including Egypt's Sinai Peninsula' project
EECH:	Egyptian Export Council for Handicraft
ETP:	Tourism and Hotels Enterprise Training Partnership
MoI:	Ministry of Interior
MoJ:	Ministry of Justice
MoSS:	Ministry of Social Solidarity
NCCM:	National Council for Childhood and Motherhood
NCCPIM:	National Coordinating Committee for Combating and Preventing Illegal Migration
NCCTIP:	National Coordinating Committee for Combating and Preventing Trafficking in Persons
UMC:	Unaccompanied migrant children
USAID:	United States Agency for International Development

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Executive Summary

Egypt is an origin, transit and destination country for smuggling of migrants and trafficking in persons. Smuggling and trafficking take place in the context of mixed, largely irregular, migratory flows from Egypt, as well as along the North-Eastern and West African migratory routes from the Horn of Africa, into North Africa and onwards into Europe. In addition to smuggled migrants and trafficked persons, these routes may involve migrant workers, refugees, displaced persons, asylum seekers, unaccompanied minors, and victims of kidnapping.

A recent study on the conditions and risks of mixed migration in North East Africa found that most migrants from the Horn of Africa do not set out with migration to Europe as their goal. However, the difficult circumstances — first in Sudan and later in Egypt, lead them to consider crossing the Mediterranean. Irregular immigrants and refugees are usually not allowed to take up regular jobs in Egypt, for example, meaning that they face challenges meeting even their most basic needs.¹

Developments associated with the Arab Spring, the ensuing political instability and socio-economic decline have also affected migration patterns. Egyptians, many of whom have lost their livelihoods, have increasingly pursued opportunities for irregular migration to Europe and are likely to continue to do so. Poor and inadequate education that does not fulfil labour market requirements has been identified as a major reason for unemployment and disenfranchisement, especially among Egyptian youth. IOM data indicate an upsurge in the smuggling of Egyptian unaccompanied migrant children (UMC) to Europe. In 2014, 2,007 (49%) of the 4,095 Egyptians arriving irregularly in Italy were unaccompanied children in comparison to only 28% in 2011. This upward trend continued in 2015, when 1,711 out of 2,610 Egyptian irregular migrants were UMC (66%). In April 2016 alone, 638 Egyptian UMCs arrived in Italy in comparison to 18 during the same month in 2015. IOM notes that these children face hazards and risks relating to their migration route including the risk of death at sea and are reportedly more vulnerable to exploitation and abuse by smugglers.

In terms of the government response to trafficking, the US State Department's Annual Trafficking in Persons Report in 2015 states that, "The Government of Egypt does not fully comply with the minimum standards for the elimination of trafficking; however, it is making significant efforts to do so. Despite these measures, the government did not demonstrate overall increasing anti-trafficking efforts compared to the previous reporting period; therefore, Egypt is placed on Tier 2 Watch List."²

On 1 October 2013, IOM began implementing the project 'Ensuring a comprehensive approach to address smuggling and trafficking in Egypt, including Egypt's Sinai Peninsula', subsequently referred to as the ECAST project. The project was funded by USAID to "assist the Government of Egypt and civil society to protect the rights of vulnerable migrants and prevent smuggling and trafficking flows to and from Egypt". The overall project budget was USD1.4 million. The original project was to be implemented from 1 October 2013 to 30

¹ <http://www.mixedmigrationhub.org/wp-content/uploads/2015/11/Conditions-and-Risks-in-Mixed-Migration-in-North-East-Africa.pdf>

² The US 2016 Trafficking in Person (TIP) report has upgraded Egypt to Tier 2

September 2015 with an overall duration of 24 months. Further to a six-month no cost extension granted by the donor, the project ended on 31 March 2016.

In line with the IOM-USAID Cooperative Agreement AID-263-IO-13-00008, IOM commissioned an independent evaluator to undertake an evaluation of the ECAST project. The purpose of this evaluation was “to assess how the activities have led to the achievement of the project results and objectives, and will also include suggestions for follow up to ensure sustainability of the achievements. The evaluation should provide a clear understanding of whether the project’s objectives have been met”.

Using the OECD Development Assistance Committee (DAC) Criteria to structure the evaluation, the evaluator developed a set of research questions to guide the assessment of the project, drawing on the draft list of evaluation questions provided in the Terms of Reference as a starting point. The evaluator used these research questions to develop an evaluation matrix, which served as the basis for developing and tailoring interview guides for the primary stakeholder groups.

Data was collected through desk review of key project documentation and direct interviews with key stakeholders in Egypt. The data was analysed and examined relationally to inform the development of the evaluation findings and recommendations and the overall drafting of this evaluation report.

The evaluation faced a number of limitations. In particular, IOM staff turnover in the course of project implementation meant that at the time of the evaluation, there was no single staff member at the IOM Cairo Office with an in-depth overview of all aspects of the project since its inception. As a result, the evaluator was unable to gather a full and comprehensive overview of project development and implementation. Also, the evaluation methodology agreed by the evaluator and IOM involved the interview of only a small number of beneficiaries of direct assistance, selected by IOM through convenience sampling.³ The evaluator cannot assume that the perspectives of interviewed beneficiaries represent the perspectives of all IOM direct assistance beneficiaries. Also, the evaluator did not meet with beneficiaries of the activities implemented by the Egyptian Export Council for Handicraft (EECH) or with the IOM staff specifically involved in these activities. Thus data available to assess these activities are limited.

In spite of these limitations, the evaluation yielded ten robust findings across the five DAC criteria of relevance, effectiveness, efficiency, impact, and sustainability. The findings do not cover each question asked or topic raised during data collection. Instead, the focus was on the issues (1) most frequently cited by respondents and in documents, (2) to which respondents and documents devoted the most time or space discussing, and (3) that were most often identified as salient across respondent types and in project and organizational documents.

Overall, the evaluation found that the project addressed clearly defined needs for: (1) increased protection services for migrants and (2) support for government capacity building in responding to trafficking in persons and smuggling of migrants. Stakeholder interviews

³ Convenience sampling is a type of sampling where the first available primary data source will be used for the research without additional requirements. In other words, this sampling method involves getting participants wherever you can find them and typically wherever is convenient. In convenience sampling no inclusion criteria identified prior to the selection of subjects. (<http://research-methodology.net/sampling-in-primary-data-collection/convenience-sampling/>)

and document review, however, identified a number of shortcomings in project design relating to: (1) a lack of clear linkages between activities, outputs, outcomes and objectives; (2) a failure to identify key assumptions and risks; and (3) indicators that could not readily be related to their respective outputs and outcomes. Taken together, these factors made it difficult to assess the achievement of outcomes and attribute these to activities specifically implemented under this project.

Further, the project design included a very broad range of activities across a wide number of stakeholders, limiting the resources able to be deployed towards any one outcome. Many of the activities were stand-alone in nature and some, notably with regard to livelihood development, fell outside what certain stakeholders across multiple respondent groups considered to be IOM’s areas of comparative advantage. IOM organisational response to these perspectives is that this broad design reflects the comprehensive approach to address trafficking in persons and migrant smuggling laid out by the UN Convention against Transnational Organized Crime and its supplementing Protocols on TIP and SOM.

In the face of an extremely challenging external environment, IOM was able to adjust the project to allocate greater resources to support services for vulnerable migrants, an area in which it made a tangible difference to the lives of more than 1,300 migrants. The project was also effective in supporting the development of new anti-smuggling legislation in line with international norms. Longer-term, smuggled migrants are also likely to benefit from this legislation, which defines them as victims rather than criminals. Through ECAST supported study tours, IOM was also able to support Government capacity building in the area of unaccompanied migrant children (UMC), considered by all stakeholders to be a priority.

Other work supported by the ECAST project that is likely to produce longer-term benefits is its support for the advancement of a comprehensive awareness raising strategy, developed under another project. The strategy offers the potential to address common shortcomings in awareness raising activities and increase the effectiveness of future interventions. ECAST’s work on this area is an example of the cross-project cooperation within IOM, facilitated by IOM’s horizontal management approach, in which staffing resources are allocated primarily according to activity type rather than to specific projects. Along with clear advantages, this approach presented challenges to the ECAST project management. Most challenges related to lack of complementary linkages between these elements and limitations in focusing project monitoring and progress reporting specifically on project activities.

1.1. Table 1: Evaluation findings

Findings by DAC Criteria	Data Source
RELEVANCE	
Finding 1: The project addressed a clear need for support to a growing pool of underserved migrants in Egypt.	Document review, interview with IOM staff and other stakeholders
Finding 2: The project allowed IOM to support the building of government capacity in priority areas of the response to trafficking in persons and irregular migration in Egypt.	Document review, interview with IOM and Government stakeholders
Finding 3: Project respondents across all stakeholder types considered IOM to have a strong comparative advantage in providing direct assistance, while certain respondents across multiple stakeholder types were unsure about IOM’s comparative advantage in supporting livelihood development under this project.	Interview with IOM, Government and other stakeholders

Findings by DAC Criteria	Data Source
EFFECTIVENESS	
Finding 4: The project design did not clearly link activities to measurable and achievable outcomes, articulate underlying assumptions, or align indicators with planned results or objectives	Document review, interview with IOM and other stakeholders
Finding 5: The direct assistance provided by the project has made a tangible impact on the conditions of direct beneficiaries of assistance	Document review, interviews with IOM and other stakeholders
Finding 6: Shortcomings in the project design, monitoring and reporting of results make it difficult to attribute stated project results to completed project activities.	Document review, interview with IOM and other stakeholders
EFFICIENCY	
Finding 7: IOM has effectively adapted the project in response to the effects of a challenging external environment.	Document review, interview with IOM and other stakeholders
Finding 8: IOM has promoted complementarity between projects to mitigate the effects of project-based funding on its ability to ensure the continuity of services and to undertake long-term planning.	Document review, interview with IOM and other stakeholders
IMPACT	
Finding 9: Stakeholders considered the major achievements supported by the project to include: (1) support for a more strategic approach to awareness raising; (2) the project's contribution to the draft of Egypt's first Illegal Migration and Anti-Smuggling Law, and (3) laying the groundwork for a Government response to unaccompanied migrant children in Egypt.	Document review, interview with IOM, Government and other stakeholders
SUSTAINABILITY	
Finding 10: The prospects for sustainability of project achievements are mixed, reflecting limited project duration and resources and inherent challenges in the sustainability of direct assistance activities.	Document review, interview IOM, Government and other stakeholders

1.2. Recommendations

Based on the above findings, the evaluator developed 11 recommendations. There are five recommendations for IOM Egypt on issues around project design and one on project management. There are two additional recommendations with a programmatic focus. There are also three recommendations for USAID as the project donor, which seek to complement and reinforce the recommendations for IOM. The recommendations, which are not in order of priority, are:

1. Project design

Recommendation 1: *IOM Egypt should continue its existing initiatives towards ensuring that project designs and project results matrices demonstrate clear linkages between activities, outputs, outcomes, objectives and indicators.*

Recommendation 2: *IOM Egypt should ensure project designs better reflect accumulated knowledge, lessons learned and the findings and recommendations of previous evaluations.*

Recommendation 3: *IOM Egypt should review its current livelihood development approach with a view to articulating the organisation's comparative advantage in this area, and consider the benefits of partnering with longer standing programmes and with more*

resources

Recommendation 4: *In developing new projects, IOM Egypt should consider the potential for a more strategic focus on a narrower set of activities.*

Recommendation 5: *IOM Egypt should consider including in all its projects in Egypt: (1) a detailed risk assessment and (2) a risk management and contingency plan.*

2. Project management

Recommendation 6: *IOM Egypt should consider how best to ensure that project reporting clearly and consistently shows progress made by, and attributable to, each project towards the achievement of its specific objectives.*

3. Programmatic follow-up

Recommendation 7: *IOM Egypt should ensure its future awareness raising activities are consistent with, and draw on, the awareness raising strategy outlined in the Public Awareness and Communication study supported by IOM.*

Recommendation 8: *IOM Egypt should continue to advocate with the Government to re-establish a shelter for trafficked persons, ensuring that the shelter is appropriately staffed with trained personnel, is operated in accordance to minimum standards, and that shelter management and operations are regularly reviewed and assessed.*

4. Donor recommendations

Recommendation 9: *USAID should consider working with other donors to support a coordinated and strategic approach for funding migrant assistance initiatives.*

Recommendation 10: *USAID should consider strengthening its project proposal review processes to ensure clarity of project logic and that indicators are specific, relevant and achievable.*

Recommendation 11: *USAID should assist organizations to ensure project designs better reflect accumulated knowledge, lessons learned and the findings and recommendations of previous evaluations.*

1. Introduction

1.1. Background

Egypt is an origin, transit and destination country for human smuggling and trafficking. Smuggling and trafficking take place in the context of mixed, largely irregular, migratory flows from Egypt, as well as along the North-Eastern and West African migratory routes from the Horn of Africa, into North Africa and onwards into Europe. In addition to smuggled migrants and trafficked persons, these routes may involve migrant workers, refugees, displaced persons, asylum seekers, unaccompanied minors, and kidnapping.

According to available data, “At the end of 2015, around 250,000 refugees and asylum seekers lived in Egypt, almost half of them coming from Syria. 2013 data from Egypt’s Central Agency for Public Mobilization and Statistics released in January 2016 indicate that 31.4 percent come from Sudan, 9.0 percent from Somalia, 4.1 percent from each Eritrea and Ethiopia, and 1.1 percent from South Sudan.”⁴ These figures do not include Palestinians nor an estimated 5,000 Yemenis stranded in Egypt in 2015. In addition, an unknown number of unregistered migrants reside in Egypt, some of them for only a short period, some for years.

A recent study on the conditions and risks of mixed migration in North East Africa found that most of the migrants from the Horn of Africa do not set out with migration to Europe as their goal. However, the difficult circumstances — first in Sudan and later in Egypt, lead them to consider crossing the Mediterranean. Irregular immigrants and refugees are usually not allowed to take up regular jobs in Egypt, for example, meaning that they face challenges meeting even their most basic needs.⁵

Migration routes, and the risks faced by migrants along them, are subject to change. For example, the completion of the main section of the Israel-Egypt border fence in January 2013 which essentially closed the route to Israel, increasing instability in the Sinai Peninsula – and the associated ongoing security operations – led to a shift in migration flows towards the west, into Libya for forward journey on to Europe. With this change the number of foreign trafficked victims reported from the Sinai Peninsula reduced substantially.

Developments associated with the Arab Spring, the ensuing political instability and socio-economic decline have also affected migration patterns. Egyptians, many of whom have lost their livelihoods, have increasingly pursued opportunities for irregular migration to Europe and are likely to continue to do so. Poor and inadequate education that does not fulfil labour market requirements has been identified as a major reason for unemployment and disenfranchisement, especially among Egyptian youth.

IOM data also indicate an upsurge in the smuggling of Egyptian unaccompanied migrant children (UMC) to Europe. In 2014, 2,007 (49%) of the 4,095 Egyptians arriving irregularly in Italy were unaccompanied children in comparison to only 28% in 2011. This upward trend continued in 2015, when 1,711 out of 2,610 Egyptian irregular migrants were UMC (66%). In April 2016 alone, 638 Egyptian UMCs arrived in Italy in comparison to 18 during the same month in 2015. IOM notes that these children face hazards and risks relating to their migration route including the possibility of death at sea and are reportedly more vulnerable

⁴ <http://www.mei.edu/content/map/livin'-edge-irregular-migration-egypt>

⁵ <http://www.mixedmigrationhub.org/wp-content/uploads/2015/11/Conditions-and-Risks-in-Mixed-Migration-in-North-East-Africa.pdf>

to exploitation and abuse by smugglers along the way and upon reaching destination countries.

The Sinai Peninsula is a particularly vulnerable area, largely deprived of equal socio-economic development in comparison to the country's urban centres. With under-resourced healthcare services, education facilities and limited socio-economic rights, some members of the local Bedouin community turn to illegal means to generate income. As a result, local conditions are not only conducive to people becoming smuggled migrants and victims of trafficking but also to their becoming perpetrators of these crimes.

In terms of the government response to trafficking, the US State Department's Annual Trafficking in Persons Report in 2015 states that:

The Government of Egypt does not fully comply with the minimum standards for the elimination of trafficking; however, it is making significant efforts to do so. Despite these measures, the government did not demonstrate overall increasing anti-trafficking efforts compared to the previous reporting period; therefore, Egypt is placed on Tier 2 Watch List.

Reports indicated many officials — particularly those outside of city centers — failed to systematically identify victims among vulnerable groups, and the government had no procedures to do so. As a result, victims were routinely treated as criminals and punished for unlawful acts committed as a direct result of being subjected to human trafficking. The government prosecuted some traffickers in 2014 but failed to convict any offenders for a second consecutive year; many trafficking cases were settled out of court, failing to adequately punish offenders or serve as a sufficient deterrent to the commission of trafficking crimes.⁶

1.2. Project context

On 1 October 2013, IOM began implementing the project 'Ensuring a comprehensive approach to address smuggling and trafficking in Egypt, including Egypt's Sinai Peninsula'. The project was funded by USAID to "assist the Government of Egypt and civil society to protect the rights of vulnerable migrants and prevent smuggling and trafficking flows to and from Egypt". The overall project budget was USD 1.4 million.

The project was structured around the "4 Ps" - Prevention, Prosecution, Protection and Partnerships - and specifically intended to:

- i) **Prevent and Prosecute:** Strengthen government capacity to counteract smuggling and trafficking flows to and from Egypt through awareness raising, training and support to enact successful investigation and prosecution of trafficking offenses;
- ii) **Protect:** Increase migrant-friendly protection assistance for persons who have been trafficked and/or are at-risk of smuggling; and
- iii) **Partner:** Work collaboratively with governmental and civil society partners to implement policies and programs, which provide community development and livelihoods opportunities.

In October 2013, in the area of **prosecution**, the project aimed to build upon a number of projects to strengthen the implementation of anti-trafficking legislation in Egypt (Law

⁶ The US 2016 Trafficking in Person (TIP) report has upgraded Egypt to Tier 2

64/2010) and to increase the rate of prosecution of traffickers. Additionally, the project aimed to provide advice to the Government of Egypt (henceforth “GoE”) on drafting anti-smuggling legislation, which did not exist at that time. The prosecution component also included study tours for government officials to exchange best practice and enhance dialogue on addressing irregular migration taking a rights-based approach (this activity was subsequently categorized under partnerships).

In the area of **prevention**, the project aimed to raise awareness of migrant smuggling and trafficking in persons, targeting youth living in Sinai and within deprived target areas where Egyptian youth were at risk of social pressure to engage in human smuggling or migrate irregularly to Europe. The project envisaged national awareness raising activities in collaboration with government agencies, including in the form of short, engaging transmissions to concisely and creatively communicate key characteristics and risks of human trafficking and smuggling. The project also aimed to establish and enhance vocational opportunities for identified source communities for smuggling in Egypt, building on existing IOM projects on livelihoods and community development in Upper Egypt. Together with NGOs, CBOs and government partners, IOM aimed to collaborate with businesses and training institutes to train target populations in required skills and to link trainees to the local job market.

To strengthen **protection**, the project aimed to expand capacity for protective shelter services for vulnerable migrants and trafficked persons to meet the high demand for the existing shelter, which also only housed women and children. As male victims of trafficking (VOTs) had no protective accommodation, the project also intended to develop a shelter for men VOTs. In addition, the project aimed to enhance existing referral mechanisms for victims of trafficking in Egypt, particularly through strengthening of the National Council for Childhood and Motherhood (NCCM) trafficking referral hotline and system. Based on identified gaps, the project further proposed to provide training on the legal and psychosocial aspects of trafficking to improve staff knowledge and understanding of the issues. In response to urgent needs, IOM would continue with direct assistance provision to vulnerable migrants, trafficked persons and Egyptians at risk of smuggling.

The original project result matrix envisaged the following outcomes:

1. Governmental and civil society actors demonstrate increased willingness to prevent smuggling and trafficking, including prosecution of traffickers.
2. Egyptian and migrant communities demonstrate increased self-awareness of human trafficking and smuggling, the risks involved in these processes as well as available protection schemes in Egypt.
3. Identified Egyptians and migrants who have been smuggled and/or trafficked or are at risk, demonstrate enhanced life and vocational skills to engage in active employment opportunities.
4. Enhanced governmental and civil society capacity and systems ensure timely and relevant protection services to vulnerable migrants (including smuggled and/or trafficked persons, unaccompanied migrant children and migrants in detention).

5. National and international development partners collaborate to implement policies and programmes which uphold migrant human rights and prevent smuggling and trafficking flows to and from Egypt.

The original project was to be implemented from 1 October 2013 to 30 September 2015 with an overall duration of 24 months. Further to a six-month no cost extension granted by the donor, the project ended on 31 March 2016.

The regional and national context has changed since the design of project activities in 2013. IOM staff report that after the 2011 revolution, there was very significant donor interest in, and support for, projects focusing on migration, particularly the human trafficking dimension. This was matched by responsiveness by some government Ministries and agencies to support the implementation of such projects. At the time of project conceptualization in early 2013, the political context thus appeared favourable to migration related actions, with leadership provided by the National Coordinating Committee for Combating and Preventing Trafficking in Persons (NCCTIP), headed by the Ministry of Foreign Affairs.

The intensification of internal terrorist attacks and the emergence of the ISIS threat in the region, however, have had a number of ramifications for the project. Security has been tightened at all levels and in all spheres, including central oversight on activities by national and international organizations. The security situation has also reportedly led the Government to take a very restrictive approach to migrants under the suspicion that any migrant could be a possible infiltrator and thus a threat to national security.

In mid 2013, leadership of NCCTIP was moved to the Ministry of Justice. Some respondents noted that NCCTIP has since taken a predominately criminal justice approach to anti-trafficking. Different respondents also noted that at the time of project development, those involved in the design might have been optimistic with regard to the stability of the country and the feasibility of proposed activities. Respondents stated that the full extent of increased insecurity could not have been foreseen at the time of project design.

The security situation has also contributed to a number of other changes affecting the project. These include: (1) a significant decline in tourism which has severely affected the economy in some areas of the country; (2) changing migration patterns as documented in the introduction; and (3) increased instability in the North Sinai Peninsula, where some of the project activities were envisaged to take place.

In view of these political, security and economic developments, the context in which the project operated was rather different from the context in which it was designed. The changes in context have challenged the implementation of some of the originally envisaged project activities, resulting in some activities being either cancelled or modified to fit the new context. These changes are discussed in Section 3 on evaluation findings.

1.3. Evaluation objectives and scope

In line with the IOM-USAID Cooperative Agreement AID-263-IO-13-00008, IOM commissioned an independent evaluator to undertake an evaluation of the project 'Ensuring a comprehensive approach to address smuggling and trafficking in Egypt, including Egypt's Sinai Peninsula', subsequently referred to as the ECAST project. The purpose of this evaluation was "to assess how the activities have led to the achievement of the project

results and objectives, and will also include suggestions for follow up interventions to ensure sustainability of the achievements. The evaluation should provide a clear understanding of whether the project's objectives have been met". The Terms of Reference for the evaluation are included as Annex I.

Following this introduction on the background and objectives of the evaluation, the remainder of this evaluation report is organized into three sections. Section 2 describes the evaluation methodology. Section 3 discusses the primary findings of the assessment, organized by the OECD Development Assistance Criteria (DAC) of relevance, efficiency, effectiveness, impact and sustainability. Section 4 provides concluding comments followed by a set of recommendations to inform future project development and activities.

2. Evaluation Methodology

At the outset of the evaluation, the evaluator undertook an initial review of project documents to obtain relevant preliminary information about the structure and focus of the project, the implementation of planned activities, and issues identified and addressed during project implementation.

Drawing on this initial review and the evaluation Terms of Reference, the evaluator developed an evaluation matrix to guide the evaluation design and data collection and analysis activities (Annex II). The matrix included (1) the primary research questions for the study to address, as aligned with the OECD DAC criteria, (2) more detailed data collection questions to inform the primary research questions, and (3) the data sources to be consulted in answering these questions. This matrix guided all evaluation activities.

Using evaluation research questions, the evaluator developed semi-structured interview guides for the evaluation (Annex III). Guides were initially developed to cover three primary stakeholder groups: (1) IOM staff involved in the management and implementation of the project; (2) government counterparts; and (3) other counterparts – Egyptian Export Council for Handicraft (EECH) and the Egyptian Tourism and Hotels Enterprise Training Partnership (ETP); and the donor. Additional guides were developed for focus group discussions with recipients of direct assistance. In the course of the interviews, data collection questions were further tailored to match respondents' particular profiles and role in the project.

The data collection process consisted of review and analysis of key project documents, and semi-structured in-person interviews with key stakeholders. These are described in detail below.

2.1. Desk Review

The evaluator reviewed key documents provided by IOM Egypt, which included: the original project proposal and the no-cost extension revised project proposal; ten quarterly project progress reports covering the period between October 2013 and March 2016; five fact sheets produced by the project; the report 'Institutional Evaluation for the Regional Shelter for rehabilitation and reintegration of girls and women victims of trafficking'; two reports produced within the framework of the IOM National Awareness Campaign for Combatting Illegal/Irregular Migration, namely the 'Public Awareness and Communication' and 'Findings and Media Assessment Report'; and the 'IOM Mission in Egypt Strategic Approach (February 2015)'.

The review of documents served to provide the evaluator with an understanding of the structure, activities and objectives of the project and contributed to informing the development of the research instruments. These data have been used to assess project's results and validate, compare or evolve findings emerging from interview data.

2.2. Stakeholder Interviews

In order to gain insight into the structure, objectives, and results of the project, the evaluator undertook a field trip to Cairo to collect and combine comprehensive information

from key project stakeholders. The field visit was conducted from 24 May 2016 to 3 June 2016 and involved meetings with multiple stakeholders including: staff of the IOM Mission in Egypt; government officials from the National Coordinating Committee for the Prevention of Irregular Migration (NCCPIM) and the National Council for Childhood and Motherhood (NCCM); representatives of ETP and the EECH; representatives from the Indonesian Embassy; a donor (USAID) representative; and recipients of direct assistance from the project.

IOM provided the evaluator with an independent interpreter to assist and facilitate a focus group discussion with Sudanese beneficiaries of direct assistance provided through this project. IOM staff did not participate in the evaluator's interview meetings to ensure evaluation independence.

2.3. Analytic Methods and Approach

Analysis of project documents and stakeholder interviews focused on addressing research questions and determining the extent to which the project's objectives had been met, as well as identifying lessons learned that could inform future programming. Primary themes that were confirmed across data sources served as the study's findings. These findings are presented individually against the relevant DAC criteria, along with the evidence in support of each finding. The evaluator then employed the findings to develop a set of practical, feasible and targeted recommendations to inform future programming and decision-making.

2.4. Limitations to the Evaluation

Evaluation limitations included:

- *IOM staff turnover:* At the time of this evaluation, there was no single IOM staff member at the IOM Cairo Office with an in-depth overview of all aspects of the project since its inception. IOM staff interviewed for this evaluation had generally been involved in project's activities since mid-late 2014. There was further a gap between the departure of one project coordinator in September 2015 and the assignment of a new staff member in charge with the project's oversight in January 2016 during which, the project was 'horizontally' coordinated by different IOM staff. As a result, the evaluator was unable to gather a full and comprehensive overview of project development and implementation.
- *Limited representation of direct beneficiaries.* Due to the limited timeframe for the evaluation and the mobile nature of the target group, the evaluation methodology agreed by the evaluator and IOM involved the interview of only a small number of beneficiaries of direct assistance, selected by IOM through convenience sampling.⁷ The evaluator cannot assume that the perspectives of interviewed beneficiaries represent the perspectives of all IOM direct assistance beneficiaries. Additionally, the evaluator was also not able to meet with beneficiaries of EECH implemented activities due to time and location constraints. The evaluator did not interview the IOM staff member

⁷ Convenience sampling is a type of sampling where the first available primary data source will be used for the research without additional requirements. In other words, this sampling method involves getting participants wherever you can find them and typically wherever is convenient. In convenience sampling no inclusion criteria is identified prior to the selection of subjects. (<http://research-methodology.net/sampling-in-primary-data-collection/convenience-sampling/>)

responsible with the management of these specific activities. Thus the evaluator has limited data upon which to assess EECH activities.

- *Social desirability bias*. The reliance on stakeholder views increases the possible effect of social desirability bias, that is the potential for evaluation participants to respond in a way that they believe will be pleasing to others — for example, exaggerating the positive aspects of a project to please project staff. Alternatively, respondents may minimise the positive aspects of a project in the hope of securing additional resources.

In spite of these limitations, the evaluation yielded ten robust findings across the five DAC criteria relevance, effectiveness, efficiency, impact, and sustainability. These findings are discussed in the following sections.

3. Evaluation Findings

This section describes the primary findings from the assessment of the ECAST project. The findings discuss – and are organized by – the relevance, effectiveness, efficiency, impact, and sustainability of project activities and outcomes. The number of findings and amount of supporting discussion differ by thematic area and finding. This variation reflects the depth and detail of responses provided during data collection and identified in analysis.

The findings do not cover each question asked or topic raised during data collection. Instead, they focus on the issues (1) most frequently cited by respondents and in documents, (2) to which respondents and documents devoted the most time or space discussing, and (3) that were most often identified as salient across respondent types and in project documents. The study findings are sequentially numbered and appear in blue font to indicate their status as a finding. There are a total of 10 primary findings.

3.1 Relevance

This section discusses findings related to relevance. DAC defines relevance as the extent to which the aid activity is suited to the priorities and policies of the target group. For this evaluation, relevance was assessed under key research questions 1 and 2:

1. *To what extent did the project “Ensuring a comprehensive approach to address smuggling and trafficking in Egypt, including Egypt’s Sinai Peninsula” address a clearly defined need?*
2. *How appropriate was the project design and strategy to achieve project results and specific objectives in the context in which it operates?*

Finding 1: The project addressed a clear need for support to a growing pool of underserved migrants in Egypt.

As highlighted in the introduction, Egypt is home to an increasing number of irregular migrants. These migrants face a number of significant difficulties. Even those legally entitled to work, such as Palestinian refugees, face similar economic constraints to those encouraging young Egyptians to migrate.⁸ With few prospects for generating a sustainable livelihood, many migrants are thus heavily dependent on social protections that are limited or non-existent. In the face of significant economic issues affecting their own nationals, Government support for migrants is very limited, with migration-related efforts typically concentrated more in the areas of border enforcement, detention of undocumented and irregular migrants, and deportation.

With respect to support from international organizations, UNHCR has responsibility for assistance to asylum seekers and refugees, while IOM is responsible for assisting other vulnerable migrants. These include trafficking victims and irregular migrants, incorporating new arrivals, stranded migrants and those who have had their asylum claims rejected. In reality, a large proportion of asylum seekers who approach protection agencies in Egypt have no official documents (passports, identity cards, birth certificates, etc.) from their

⁸ Egyptian work permits are difficult to obtain. Article 11 of Ministerial Resolution 390 of 1982, issued by the Ministry of Labor, requires proof on the part of the employer that no Egyptian national is available to do the work before a permit may be issued (https://www.loc.gov/law/help/refugees/legal-status-refugees.php#_ftn7)

country of origin. For UNHCR, lack of documentation constitutes a major impediment to effective protection measures being put in place.⁹ Recipients of IOM assistance interviewed through a focus group discussion for this evaluation stated that it can take three to six months to obtain a first appointment with UNHCR, during which time there is no entitlement to UNHCR assistance. When an undocumented asylum seeker registers with UNHCR, he/she is provided with an appointment slip ('white paper'), which specifies the date of the refugee status determination interview.¹⁰ Focus group respondents reported that the average waiting time for the refugee status determination interview can be between three to five years.

The 'white paper' does not allow access to UNHCR-funded medical and non-medical assistance. Thus, although refugees that have begun the status determination process with UNHCR fall outside of the IOM mandate, "white paper holders often have no option but trying to access IOM provided medical services".¹¹ IOM also addresses the same lack of options, which applies to people who have completed the refugee status determination process and have been found ineligible for UNHCR support.

Against this background, evaluation respondents across all stakeholders groups, in particular the participants in the beneficiary focus group discussion, strongly agreed that the assistance provided by IOM in Egypt through ECAST and other projects fills a crucial gap in services provided to irregular migrants.

Finding 2: The project allowed IOM to support the building of government capacity in priority areas of the response to trafficking in persons and irregular migration.

The project design included provision for IOM to assist the government in addressing a number of gaps in the institutional response to trafficking and irregular migration. In terms of trafficking, IOM sought to assist the government to increase the number of TIP prosecutions through training of judges and prosecutors, considered a priority by all stakeholder groups. The design also envisaged support for trafficked persons through: (1) the establishment of a male shelter; (2) training on the legal and psychosocial aspects of trafficking to staff of the existing shelter; and (3) support for strengthening the existing national referral mechanisms and developing standard operating procedures.

With respect to irregular migration, migration-related policies and practices in Egypt have traditionally been limited to border policing and the control and repression of criminal acts associated with crossing borders illegally. There are numerous documented reports of irregular migrants suffering indefinite detention and serious mistreatment in violation of their basic rights in Egypt. The ECAST project design involved important support for the development of national legislation, inclusive of clear provisions for the assistance and protection of irregular migrants. This included supporting preparatory work in the drafting of a new anti-smuggling law, with a view to highlighting international best practices and

⁹ Asylum matters in Egypt are formally administered by the Ministry of Foreign Affairs and the Ministry of Interior, in particular, by the Refugee Affairs section in the Ministry of Foreign Affairs. However, according to a Memorandum of Understanding with the UNHCR signed in 1954, the UN office is de facto in exclusive charge of registration, documentation and refugee status determination (RSD) procedures (source: <http://www.mixedmigrationhub.org/wp-content/uploads/2015/11/Conditions-and-Risks-in-Mixed-Migration-in-North-East-Africa.pdf>)

¹⁰ <http://www.mixedmigrationhub.org/wp-content/uploads/2015/11/Conditions-and-Risks-in-Mixed-Migration-in-North-East-Africa.pdf>

¹¹ Ibid.

Egypt's obligations under international treaties, including that irregular migrants should not be criminalised but rather be considered victims of smuggling.¹² Until the end of the project in March 2016, IOM has recorded numerous cases of smuggled migrants who have been detained for substantial periods of time. This practice should be discontinued following adoption of the new Law on Illegal Migration and Anti-Smuggling. The project also included support for study tours for government officials to enhance dialogue and exchange of best practices. IOM was able to use this component to support capacity building in the area of unaccompanied migrant children (UMC), considered by all stakeholders to be a priority.

Finding 3: Project respondents across all stakeholder types considered IOM to have a strong comparative advantage in providing direct assistance, while certain respondents across multiple stakeholder groups were unsure about IOM's comparative advantage in supporting livelihood development under this project.

IOM is recognised globally as a leading organisation in the provision of support to trafficked persons and vulnerable migrants. IOM is able to draw on specialist staff expertise in its dedicated Mission to Egypt and Regional Office for the Middle East and North Africa, both situated in Cairo, as well as global level expertise, training and resource materials such as the IOM Direct Assistance Handbook reflecting many years of experiences and lessons learned around the world. Consistent with findings from the Protection project evaluation, feedback across all respondent groups confirmed that stakeholders view direct assistance, including AVRR, as being a strong area of comparative advantage of the organisation.

Stakeholders interviewed in the course of the ECAST project evaluation were less convinced of IOM having a similar comparative advantage in other areas of the response, in particular support for livelihood and youth employment initiatives. Without questioning the importance of such initiatives, certain respondents across multiple stakeholder groups questioned whether IOM had the appropriate skillset to design, implement and monitor these types of programmes. Respondents further cited the presence in Egypt of a number of major initiatives supported by organisations with a more specific focus, greater experience and more resources in implementing such types of initiatives. These include, for example, projects and programmes implemented by ILO, EU partners, USAID partners, the World Bank and GIZ.¹³

IOM's organisational response to these views was that:

IOM has been implementing such livelihood development initiatives globally, and in Egypt this intervention was designed based on previous experience (under a Swiss and PRM funded projects in Aswan as well as an EU funded regional project) in supporting livelihood development by way of providing sustainable opportunities/alternatives to irregular migration especially when operating in marginalised areas where youth is at high risk of irregular migration. IOM calls on the support of implementing partners with extensive experience in livelihood when implementing such interventions. Under other

¹² Article 2 of the new anti-smuggling law draft departs quite significantly from current legislation. At present, the two main administrative law instruments that deal with irregular entry into or exit from the Egyptian territory (the Law on Entry and Residence of Aliens in the Territories of the United Arab Republic and their Departure Therefrom (Law 89/1960 as amended by law 88/2005), and the 1995 Presidential Decree Security of the Eastern Border of Arab Republic of Egypt) include particularly strict detention measures for irregular border crossing. For instance, Article 27 of Law 89/1960 establishes that "authorities can keep non-citizens in detention after they complete criminal sentences until they are deported".

¹³ Some of these initiatives are described in ETF, 2015 '*Policies and Interventions on Youth Employment in Egypt*' (http://pjp-eu.coe.int/documents/1017981/1668235/Employment+policies_Egypt.pdf/bf708ee0-fd95-4f24-836f-90205661b9df)

projects managed by IOM Egypt livelihood interventions are implemented in partnership with the above-mentioned organizations (ILO, GIZ, and others).

Another staff member considered that IOM's comparative advantage lay in the fact that "these organisations have however different mandates and do not target migrants." The livelihood component in the ECAST project was not, however, implemented with migrant populations, and documentation and stakeholder feedback did not evidence linkages to initiatives implemented by the organisations with large livelihood programmes or to Government policies and initiatives addressing youth employment.¹⁴

Certain respondents across multiple stakeholder groups also questioned whether IOM should be involved in supporting capacity building initiatives for criminal justice. This is a particularly complex issue in Egypt in view of the human rights concerns associated with Egyptian law enforcement machinery. A key component of capacity building is to identify and develop strategies to address barriers to the implementation of the knowledge and skills learned in training workshops. These barriers include rotation, corruption, lack of political will, lack of resources, limited coordination processes within the criminal justice system and between the criminal justice system and victim support agencies. Neither the project design nor project reporting acknowledged any of these potential barriers or their implications on efforts to build capacity.

Unlike the issue of livelihood development, however, there is a gap in technical assistance in the area of capacity building for criminal justice actors. UNODC, which has a specific mandate in this area, has a weak presence in Egypt and feedback from Government respondents suggest reservations about the assistance provided by UNODC to date.

In summary, study data suggest that IOM has a strong comparative advantage in providing support for vulnerable migrants including VOTs, which, as highlighted in Finding 1, is an area of great need. Testimonial data collected in the course of this evaluation question the extent to which IOM had a comparative advantage in two other areas. In one of these, capacity building for criminal justice, there are gaps that are not being addressed by other agencies and projects. In the other, livelihood development, a number of major initiatives currently exist in Egypt, operating by organisations with a strong mandate, more resources and a longer history of experience in this area.

3.2 Effectiveness

This section discusses findings related to effectiveness. DAC defines effectiveness as the extent to which an aid activity attains its objectives. For this evaluation, effectiveness was assessed under key research questions 3-5:

3. *To what extent does project documents identify the outcomes and impacts expected from the project and link these with proposed activities?*
4. *How do key stakeholders understand the extent to which projects objectives have been achieved?*
5. *What are the main obstacles or barriers that the project has encountered during the*

¹⁴ IOM notes that "IOM coordinated with ILO so beneficiaries from the handicraft interventions with EECH could benefit from their 'GET Ahead for Women in Enterprise Training' however the specific beneficiaries were not supported under this project but an SDC funded project. Cooperation with GIZ was also in the context of other projects".

implementation of the project? Has the project been successful in addressing these obstacles and how?

Finding 4: The project design did not clearly link activities to measurable and achievable outcomes, articulate underlying assumptions, or align indicators with planned results or objectives.

The project design and result matrix do not appear to have been fully conceptualized, with the result that it was not clear how activities were expected to lead to the achievement of the project outcomes and the overall project objective. The first outcome, for example, was that “Governmental and civil society actors demonstrate increased willingness to prevent smuggling and trafficking, including prosecution of traffickers”. Under this outcome, there was one output, “Governmental and, civil society actors, international and national partners have knowledge of the Egyptian legal framework to identify, screen and refer smuggled and/or trafficked persons to relevant protective services to uphold migrant rights”. There were three indicators for this output concerning the number of trained partners, an offer of legal expertise to Egyptian authorities for legislative development and the development of an advisory paper.

The outcome indicators included the number of cases, referred, investigated and prosecuted. There was, however, no articulation of how the activities, or the output included under this outcome would lead to an increase in cases investigated or prosecuted or how these would be attributed to the project. Further none of the assumptions articulated in the results matrix addressed the link between project activities and an increase in prosecutions.

Under Outcome 3, Output 3.3 was that “Egyptian youth, vulnerable to smuggling, receive vocational and life skills trainings and are linked to the local job market accordingly”. The design did not include methodology, criteria or procedures to identify “Egyptian youth *vulnerable to smuggling*”, leaving these to be defined in the course of project implementation.

IOM staff noted that this level of detail was not required in the proposal. The criteria that were defined in the course of implementation, namely ‘Egyptian youth (18-35) unemployed and/or underemployed, of which at least 40% are at risk or victims of smuggling and/or trafficking’ appear to be applicable to a very large proportion of Egyptian youth, of which the project aimed to provide training to 100.¹⁵ Notwithstanding IOM’s intention to focus on areas with high emigration rates, a clearer definition of vulnerability at the early stages of project design might have encouraged reflection on the potential size of the target group and the impact that an activity of this size could realistically be expected to have.

Other issues identified by a review of the project design include:

- *Indicators that are not easily related to outcomes.* For example, Outcome 5 is that “national and international development partners collaborate to implement policies and programmes which uphold migrant human rights and prevent smuggling and trafficking flows to and from Egypt”. One of the two indicators is the number of focal

¹⁵ According to 2015 data from the Egyptian Central Agency for Public Mobilization and Statistics (CAPMAS), “Egyptian youth represent 23.6% of the total population, around 20.7 millions, and around 26.3% of those youth suffer unemployment, while 51.2% suffer poverty. In 2014, the youth unemployment rate reached approximately 29%, while those in poverty stood at 50%. The number of Egyptians leaving the country increased by 17% in 2014 compared to the preceding year”.

points appointed by GoE at relevant ministry levels to ensure sustainability of the efforts of the national referral mechanism committee.

- *Indicators that are not easily related to outputs.* For example, Output 5.2 is that “new partnerships and sub-grants are afforded to civil society actors to expand opportunities for smuggled and/or trafficking persons.” One of the indicators for this output is the number of intra-regional organized study tours for the GoE to enhance dialogue and exchange of best practices between countries.
- *Lack of clarity in the results matrix as to which activities lead to which outputs and outcomes.* Activities under the first three outcomes are grouped together under the heading “prevention and prosecution”, meaning that it is not immediately clear which activity relates to which output and outcome.

In the words of one stakeholder, “the project didn’t seem to have a theory of change”. Beyond the lack of clear project logic, multiple stakeholders commented on the broad nature of the design. With regard to project’s target groups, for example, these ranged from Government agencies to prosecutors, to at-risk youth, to trafficked persons and smuggled migrants, to media, to NGOs. The project’s chosen areas of focus covered capacity building for prosecutors, awareness raising to multiple target groups through multiple means, vocational training, and the creation of durable employment opportunities, direct assistance etc. There appeared, however, to be a lack of linkages between these components.

Commenting on the breadth of project design, one stakeholder considered that “IOM finds itself in the dilemma of wanting to address all areas of the Palermo protocol with projects that are by definition limited in time, in resources and thus in the ability to make a real and comprehensive impact”.

IOM staff attributed their attempt to work across all Ps (Prosecution, Protection, Prevention; and Partnership) as a response to donor preference. This approach, however, resulted in a project design where different components were distinct and individualised. Project activities and components were not designed in such a way as to support and reinforce each other. Activities were scattered in terms of location and target groups, and there were very limited linkages across components. Moreover, given the breadth of the project design, the original project timeframe of 24-months was unrealistic with regard to the generation of more solid and lasting results.

During implementation IOM realised some of the shortcomings in the original project design. One IOM staff member told the evaluator that “the results matrix in the original project design was rather confusing. Indicators were repetitive and unclear; assumptions were not really assumptions.” IOM reorganised the result matrix at mid-term, modifying activities and indicators following changes in originally envisaged activities. For example, IOM removed activities and indicators related to the establishment of a shelter for trafficked males and adjusted indicators related to awareness raising. However, gaps in the linkages between activities, outputs, outcomes and indicators were not fully resolved.

IOM is aware of project design issues, which are not specific to the ECAST project. In 2014, the organisation established a Project Coordination Unit, responsible for the provision of expertise and technical assistance to (1) project development; (2) monitoring and evaluation; (3) ensuring project result matrices are logically developed with clearly defined and relevant indicators. Internal staff training has already been conducted to enhance staff capacity in the area of project design and in the use of the IOM Results Matrix.

Overall, document review and stakeholder interviews highlighted inconsistencies in the results matrix, an extremely broad design covering a wide range of stakeholders and activities, and timeframes considered by respondents to be overly ambitious. Taken together, these issues appear to suggest the lack of an overall strategy (or theory of change), for the project that highlighted the changes the project sought to bring about, the pathways to doing so, and the resources (time and financial) to support this strategy.

Finding 5: The direct assistance provided by the project has made a tangible impact on the conditions of direct beneficiaries of assistance.

The majority of migrants approaching IOM for assistance to date had been Sudanese, Ethiopians, Eritreans, South Sudanese and Somali.¹⁶ Other recorded nationalities included migrants from Yemen, Libya, Sri Lanka, Indonesia, the Philippines, Comoros, Guinea. IOM provides direct assistance to migrants through a range of different projects, including ECAST.¹⁷

The ECAST project differed from other projects in that it did not specify the nationalities of migrants entitled to receive AVRR. The project therefore played a crucial role in allowing IOM to assist migrants from countries not covered by other projects. Overall, the ECAST project assisted vulnerable migrants from the Horn of Africa as well as from Nigeria, Senegal, Cote d'Ivoire and Comoros.

Since the beginning of this project, the number of migrants in Egypt has been increasing. The ECAST project contributed to increase AVRR opportunities to migrants wishing to return to their countries of origin. IOM data for 2015 record a 40% increase from the previous year in the number of assisted returnees in 2015 mainly to Ethiopia, Sudan, Nigeria, Guinea, Ivory Coast, Senegal and Cameroon.

IOM was able to use project funds to provide AVRR assistance to 231 individual migrants wishing to return to their home country, against an original target of 120 migrants. The total includes 85 AVRR beneficiaries able to receive assistance due to this project's reallocation of funds (see Finding 7). The reallocation also allowed IOM to provide financial support beyond the original allocation to recipients with additional needs.¹⁸

At the time of this evaluation, IOM had been able to follow-up on approximately 55% of the returnees. As follow up is done from three to six months after return, IOM staff expect to be able to reach 70% of returnees through follow-up of more recent departures. IOM's ability to follow up on returnees depends on a variety of factors. When returnees are a family, monitoring can be easier as families tend to settle down in one location and remain there. When returnees are individuals, for example migrants that were in detention and used the AVRR as an opportunity to leave detention, it may be more difficult to track them down as

¹⁶ Recently, an increase in the number of Ethiopians accessing IOM services has been noted. These are mainly relatives and family members amongst the many hundreds of migrants that died in April 2016 during their journey from Libya to Italy. Further to this tragedy, many express their intention to return back to Ethiopia.

¹⁷ During the ECAST project, these included the NOAH project (US/PRM funded), the Protection Project (EU funded) and PLAYA Project (USAID funded).

¹⁸ This was for example, the case of one recipient who has used AVRR funds to start a small business. Because of the investment made in the business and the time required for the business to start generating income, she found herself without money for rent and was thus considering selling the business. Thanks to reallocated funds, IOM was able to provide additional financial support to cover her rent for additional six months (100 USD/month) allowing her to keep the business.

some may have returned without necessarily having a genuine plan for reintegration or intention to remain in their country indefinitely.

In addition to AVRR, IOM provided direct assistance to 1,089 migrants. This included financial and medical assistance, information to migrants about what they are entitled to claim, and referral for specialized psycho-social care to refugees, asylum seekers, stranded migrants, unaccompanied children and migrants on the move to join family members already abroad. This number includes 283 additional migrants provided assistance following the project re-allocation of funds. Through funding available from this and other projects, IOM was able to increase its direct assistance as highlighted by IOM data from 2015, which show a 158% increase in the number of assisted non-Egyptians compared to 2014. Through the support provided to the regional shelter for trafficked women and children, the ECAST project also assisted 45 of 111 beneficiaries in the time of the shelter operations (2011 to 2015).

Stakeholders across all respondent groups, and particularly focus group feedback beneficiaries highlighted the importance of IOM direct assistance, consistent with similar views expressed during the evaluation of the IOM Protection Project. Through the provision of assistance to these groups, IOM's interventions fill crucial protection gaps that are also rooted in the absence of clear provisions for the protection and assistance of irregular and undocumented migrants in the Egyptian legal framework.

With regard to IOM support for the new shelter for VOTs, IOM was unable to proceed with the initial plans of building a new one. The project contributed to the running costs of the existing shelter from 1 June 2014 to 1 May 2015, when the NCCM, NCCTIP and IOM MoU Shelter expired. During this time, IOM identified concerns with respect to the shelter not meeting its Minimum Standards. It commissioned an institutional assessment to help identify key issues in the running of the shelter with a view also to informing operations to new planned shelters - an expanded shelter for women and children and a shelter for men.

The assessment highlighted a number of major issues in the running of the existing shelter. These included: (1) a failure to provide adequate services to non-Egyptian clients; (2) shortcomings in human resource management – such as the Government of Egypt not providing contracts to staff and staff not being appropriately trained; and (3) restrictions on the movement of shelter clients, who were not allowed to leave the shelter – a breach of international human rights standards.¹⁹

IOM reports that they continued support for the shelter due to the lack of alternatives for VoTs. The Government of Egypt decided not to renew the MoU and the shelter was subsequently closed. There is currently no Government shelter available for trafficked persons in Egypt.

Finding 6: Shortcomings in the project design, monitoring and reporting of results make it difficult to attribute stated project results to completed project activities.

A review of the results matrix provided in IOM's project progress reports reveals a number of difficulties in terms of attributing the stated results to project activities. These difficulties centre around issues relating to the project design (Finding 4), monitoring and cumulative

¹⁹ Gallagher, Anne T. and Pearson, Elaine, *Detention of Trafficked Persons in Shelters: A Legal and Policy Analysis* (October 20, 2008).

reporting – that is, reporting that combines the activities and achievements of a number of different projects.

With regard to monitoring, Outcome 3 of the project involved provision of job training and placement for Egyptian youth vulnerable to smuggling. As noted (Finding 4), the project design did not define the ‘vulnerability’ criteria for this group. In the course of project implementation, IOM allocated the responsibility for beneficiary selection to the sub-contractor on the basis of questions provided by IOM for inclusion in the application form²⁰.

IOM staff stated that

IOM did not take part of the selection process, requested ETP to provide the data collected early on and before trainings started to ensure the target group was the intended one, which ETP submitted stating that the target was met during the selection.

Information resulting from monitoring conducted by IOM at the end of the intervention and subsequent reports from the sub-contractor were however contradictory with regard to participant profiles. IOM staff reports that ETP submitted fake documents by email in response to IOM’s request to review the application forms to ascertain that these included the questions provided by IOM.

While IOM conducted regular field visits to monitor other activities under this component, IOM staff acknowledge that tight monitoring of activities under this component should have been undertaken from the beginning in particular to beneficiary selection and job placement. At the time of the evaluation, IOM was in the process of attempting to clarify the issue of conflicting data on participant profiles. Until this is resolved, the evaluation has no way of verifying whether the selection of trainees was consistent with its intended target group, and thus whether the final beneficiaries of activities under this output were the intended one.

As per the issue of reporting, cumulative reporting of IOM activities across projects is permitted by the donor and provides a useful overview of how project activities are located with IOM’s wider country activities. At the same time, it has contributed to a situation where the ECAST results matrix is attributing achievements to ECAST that do not entirely relate to project activities. Under Output 1.1, for example, the project used as a baseline for trained government and civil society personnel the total number personnel trained at project outset across all counter-trafficking projects implemented by IOM Egypt.

The project set a target of a 15% increase on this figure, which was 2600. The project reports achievement of a 36% increase in number of people trained and calculates that this represents an achievement rate of 239%. However, the same report states that the project itself trained 80 personnel, meaning that only a 3% increase in the overall number of people

²⁰ The questions provided by IOM were as follows:

- Have you ever migrated to another country? If yes
- With what kind of visa: *Work visa; Tourist visa; Medical visa; None of the above.*
- Have you considered migrating to another country? If yes:
- Reason for leaving: *Lack of opportunities in Egypt; Family reunification; Health issues ; Other.* Timeframe: *In less than one month; Between one to six months; Between six months to one year; Between one and two years; After two years.*
- Have you ever experienced exploitation or been forced to work without pay?

trained is attributable to this particular project. Based on the figure provided, the actual achievement rate for the ECAST project is 20%, not 239% as stated.

IOM staff maintain that its interpretation is valid, stating that:

The target of the indicator must logically be read as cumulative, i.e. not directly attributable to the particular project, because a) the target must be consistent with the baseline which was defined cumulatively and b) the target would not correspond to the resources allocated within the project if read as directly attributable to the project. That said, a footnote specifying what trainings were attributable to ECAST were included to avoid any misattribution. The target in the project document is clearly cumulative as otherwise it is wildly unachievable with the resources allocated within the project.

Under Outcome 5, one of the indicators is the number of focal points appointed by the government at relevant ministry levels to ensure sustainability of the efforts of the National Referral Mechanism committee. The target was to increase the number of focal points from 4 to 9. IOM has reported the result as 21 focal points, based not on the NRM committee, which is not currently functioning, but on the composition of NCCTIP. No basis is provided to attribute this result to the work of the project.

Still with regard to Outcome 3, the tenth (and final) quarterly project progress report provides a figure of 96 against the indicator 'number of Egyptians at risk of smuggling remain employed at the final project reporting period'. The project reports this as a 485% level of achievement against the initial target of 20.²¹ However, IOM's monitoring after the intervention was completed found that 49 of the beneficiaries reported to have *already* been employed prior to receiving the training by ETP. This is one of the issues the Mission is currently addressing with the implementing partner. The use of the figure of 96, although technically not incorrect, appears to overstate the contribution made by the project to the achievement of this indicator.

Combined with earlier findings on project design (finding 4), these monitoring and reporting issues have accentuated the difficulties of assessing the extent to which the implementation of ECAST project activities have contributed to the achievement of desired results.

3.3 Efficiency

This section discusses findings related to efficiency. DAC defines efficiency as a measure the outputs -- qualitative and quantitative -- in relation to the inputs. It addresses questions such as whether the activities were cost-efficient and whether the objectives were achieved on time. For this evaluation, efficiency was assessed under key research questions 6:

6. What factors contributed to the efficiency /inefficiency of project implementation?

Finding 7: IOM has effectively adapted the project in response to the effects of a challenging external environment.

The context in which the project operated presented a number of challenges, which impacted on the implementation of the project. The four major challenges concerned: (1) Government priorities with regard to migration and the treatment of irregular migrants; (2)

²¹ The correct percentage using this figures is 480%

increased centralisation of government decision-making; (3) information restrictions associated with a new law on terrorism; and (4) strong restrictions on working with non-government organisations.

As highlighted in Finding 2, government policies with regard to irregular migration have been heavily influenced by security concerns, favouring removal of migrants from the country without necessarily due regard to their status or applicable rights. This has increased the burden on IOM to provide support for migrants, while at the same time making this work more difficult through a lack of government engagement and restricted access to migrants in detention. One manifestation of limited Government commitment was its decision to reallocate premises that had been identified to set up a new shelter for trafficked women and children. This meant that the project was unable to continue its shelter support activities. It also meant that at present there is no Government operated shelter for VoTs currently residing in Egypt. Available shelter protection mechanisms are the ones offered by the local non-government organisation Psycho-Social Services and Training Institute in Cairo (PSTIC), which offers transit emergency shelter for a maximum of 10 days; Embassy-run shelters such as those at the Indonesian and the Philippines Embassies; and local community shelters.

Security considerations, along with major changes in government structures and personnel, have also affected government approval processes. Whereas previous IOM projects were able to work directly with counterparts at local levels, many of whom enjoyed considerable autonomy, government screening and authorisation is now required for all project activities. IOM staff consistently reported that the requirement for individual approvals, and the lengthy process associated with obtaining these approvals, provided a major challenge to the implementation of project activities. As a result, many activities faced significant delays while others had to be cancelled when authorisation was not granted.

A further consequence of the security situation is the anti-terrorism law, which was adopted in August 2015. The law forbids the publication of any information that is not in line with official government statements. This has affected the project's ability to freely conduct surveys and other data collection activities, lest these activities be perceived by Government as in breach of the law. Different stakeholders interviewed for this evaluation reported, for example, that screening questions aimed at identifying beneficiaries of vocational training under Outcome 3 had to be reduced from 15 to 5 and broadened in focus to avoid resembling a survey, in light of government sensitivities to data collection, as well as to increase the likelihood of beneficiaries accepting to answer questions on such a sensitive issue as smuggling and trafficking.

Finally, NGOs in Egypt operate under Law 84/2002 which requires them to register with the Government, declare their activities and obtain official approval from the Ministry of Social Solidarity before receiving funding from international organizations.²² While this law dates back to 2002, IOM staff report that it had never been strictly applied. Since 2014, the law has been applied in a very restrictive way, with a major impact on actions based on cooperation with NGOs. For example, IOM was unable to start planned cooperation with Education for Employment (EFE) because this counterpart did not receive approval from the Ministry of Social Solidarity.²³ IOM staff also consider that the current political situation and

²² <http://www.bu.edu/bucflp/files/2012/01/Law-on-Nongovernmental-Organizations-Law-No.-84-of-2002.pdf>

²³ Originally intended as a way of promoting local capacity development and long-term sustainability, IOM staff also considered that in the existing environment, local NGO engagement in the provision of direct assistance may not be in line with the best interest for their clients. They were particularly concerned about the risks associated

the climate of suspicion around the issue of migration further discourage NGOs from engaging in service provision for migrant groups.

IOM has taken a number of measures to mitigate the effects of these external factors on the implementation of project activities. A key step, taken in consultation with the donors, was to reallocate project funding from activities to be implemented by NGOs to direct assistance and AVRR activities. This not only increased IOM's capacity to address the growing needs of vulnerable migrants but also helped to offset the lack of government-funded initiatives to uphold migrant rights.

As well as endorsing the reallocation of funds, the donor agreed to a six-month project extension to help offset some of the implementation delays faced by the project. Added to the reallocation of resources and the direct provision of services, this decision helped to mitigate the effects of some of the major challenges faced by the project.

Finding 8: IOM has promoted complementarity between projects to mitigate the effects of project-based funding on its ability to ensure the continuity of services and to undertake long-term planning.

IOM's horizontal management approach allows IOM to promote complementarity between projects, both projects running concurrently and those running consecutively. The ECAST project design envisaged that the project would build on a number of previously implemented projects as well as work in partnership with other concurrent IOM projects. Clear complementarity was identified, for example, with a J/TIP funded project aiming to strengthen the implementation of anti-trafficking legislation in Egypt, implemented from January 2010 to May 2014. ECAST project documentation states that the project was designed to "complement the J/TIP project and ensure continuity, to build on these efforts and support the implementation of trainings aiming to raise awareness of civil society, judges and prosecutors". This was done through the implementation of further training and workshops for Government officials and CSOs on the international migration legal framework as well as on the Egyptian anti-trafficking Law 64/2010.

The ECAST project also built on assessments and studies conducted within the frame of other IOM implemented projects, using for example the assessment on livelihood needs conducted under the PRM funded project to inform activities undertaken by EECH under the ECAST project.

The issue of linkages across projects is particularly important with regard to direct assistance, where gaps and interruptions in assistance can have tangible, in some cases life threatening, consequences for vulnerable migrants and trafficked persons. The ECAST project allowed IOM to continue existing services for migrants, working in partnership with other projects. ECAST project was also able to take over the running costs of the shelter established by the J/TIP and a PRM-funded project, and to support operations until the expiry of the shelter MoU in May 2015. Notwithstanding concerns with respect to shelter operation, this is an example of IOM using funds effectively across different projects to ensure continuity of services.

As these examples suggest, IOM's approach generates efficiency by: (1) allowing many

with allowing NGOs to collect and hold sensitive client data and their ability to protect the safety and security of their clients.

activities to build on existing linkages, knowledge and relationships rather than starting from scratch: (2) reducing the potential for overlap and duplication between different projects: (3) promoting continuity of services; and, although some IOM staff perceive that the organization does not currently take full advantage of this, (4) allowing IOM to strategize approaches beyond individual project timeframes.

3.4 Impact

This section discusses findings related to impact. DAC defines impact as the positive and negative changes produced by a development intervention, directly or indirectly, intended or unintended. For this evaluation, impact was assessed under key research question 7.

7. What do those who participated in the project activities regard as their primary achievements?

Finding 9: Stakeholders considered the major achievements supported by the project to include (1) support for a more strategic approach to awareness raising; (2) the project's contribution to the draft of Egypt's first Illegal Migration and Anti-Smuggling Law, and (3) laying the groundwork for a government response to unaccompanied migrant children in Egypt.

As highlighted under Finding 4, ECAST consisted of a broad range of activities. Many of these activities were not linked to other activities within the project, although some were aligned with activities supported by other IOM projects. In this context, stakeholders both within and outside of IOM expressed difficulties in identifying individual achievements of the project, as reflected in the quote that “it is difficult to pinpoint any one single achievement by this particular project – the achievements should be seen in complement with other projects.” Notwithstanding this caveat, evaluation respondents highlighted four main areas of achievement. In addition to achievements relating to direct assistance (Finding 5), stakeholders specifically identified three major achievements likely to generate significant benefit beyond the life of project.

The first achievement related to the development of a document on “Public Awareness and Communication Study”, which includes an awareness raising strategy for use by NCCPIM and IOM. The strategy is complemented by a media assessment. The media assessment highlights the inconsistency of public messages conveyed by different relevant stakeholders on issues related to irregular migration, as well as the poor quality of media stories on these issues.

The two documents, developed by an external communications professional, offer insights into the current situation with regards to knowledge of migration and risk among the population, as well as the value of some existing awareness raising initiatives. The strategy outlines a strategic and comprehensive approach towards ensuring that future awareness raising activities draw on basic communication principles. For example, it highlights that programmes must move beyond the one-way provision of information to more interactive approaches:

(R)ather than public awareness tactics such as public service announcements and traditional media engagement to increase exposure of the issue in print, TV, radio and online channels, community based tactics are considered to be of higher

priority, taking into consideration the complexity of the issue and the need for direct communication with potential illegal/irregular migrants and their parents.²⁴

The strategy further underlines the role of peer pressure and social norms in decision-making:

Youth face peer pressure to illegally/irregularly migrate from ... peers from same age bracket who are convinced that illegal/irregular migration is the only way to achieve their dreams ... community members (neighbours, relatives, acquaintances) ... their parents or other family members. Their dreams and aspirations are shaped by their families and communities opinions and perceptions and they revolve mainly around financial/economic ones.

Stakeholders within and outside IOM praised the strategy and media assessment, both in terms of quality and usability. One respondent stated, for example, that “the biggest value added by these documents is that everything is in one place.” Although funded by another project (NOAH II, funded by PRM) the ECAST project played an important role in promoting and starting to operationalizing the strategy. Specifically, it funded the development of five fact sheets to address information gaps and inaccuracies identified in the media assessment report.

NCCPIM has already taken steps to operationalize the strategy, particularly with regard to activities focusing on Egyptian youth. Recognising that awareness raising strategies aimed at preventing irregular migration need to offer realistic alternatives (either with regard to safe migration or with regard to opportunities available at home), one component of the strategy aims to inform young people about concrete opportunities available to them, such as the loans from the Ministry of Local Development and the Social Fund for Development. Representatives from these agencies have joined NCCPIM in community visits to promote these opportunities among the youth. Other components of the awareness raising strategy include the promotion of technical education and the value of work; development of partnerships with, and engagement of, the private sector; the involvement of religious leaders in designing and delivering context-specific messages and information.

With regard to the project contribution to legislation, the ECAST project provided important support to the development of national legislation, inclusive of clear provisions for the assistance and protection of irregular migrants. This included supporting preparatory work leading to the drafting of the Illegal Migration and Anti-Smuggling Law. The new law, drafted on the blueprint of UNODC model law against the smuggling of migrants, is expected to fill current protection gaps. For example, the current draft Article 2 affirms that illegal migrants shall not bear any civil or legal responsibility as they are considered a victim to the smuggling crime. This draft is currently at its final stages of review and is expected to be passed within the year.

Multiple stakeholders also considered that the Government exposure to international migration legal frameworks through IOM’s project supported workshops and study visits contributed to the broader process of increasing the Government’s understanding of international migration legal frameworks particularly with regard to the non-criminalisation of irregular migrants and their protection rights.

²⁴ Community based tactics include: peer leadership programs; schools programs; and community outreach events.

The third achievement area highlighted by stakeholders was the support provided by the ECAST project to the Government response to the issue of Unaccompanied Migrant Children (UMCs) in Egypt. At the time of drafting of the project, IOM data showed that a quarter of trafficked persons served by IOM Egypt were under 19 years old and predominantly from Eritrea and Ethiopia. The development of a protection framework for UMCs was reported by different stakeholders as being an important and pressing priority for the Government. The ECAST project organised a study visit to Italy by a delegation of GoE officials to review the Italian legislative framework for the protection of migrant children. Stakeholders report that the study visit was instrumental in the consequent establishment of a dedicated NCCPIM Working Group to develop a UMC protection system informed by the Italian model. This will also include a dedicated national referral mechanism, and provisions for the National Council for Childhood and Motherhood (NCCM) to act as the legal representative of children whose legal guardians cannot be reached.

3.5 Sustainability

This section addresses the sustainability of project achievements. DAC defines sustainability as concerned with measuring whether the benefits of an activity are likely to continue after donor funding has been withdrawn. For this evaluation, sustainability was assessed under key research questions 8 and 9:

8. To what extent are the key outcomes achieved sustainable beyond the project?
9. What are the major factors influencing the sustainability or non-sustainability of project's achievements?

Finding 10: The prospects for sustainability of project achievements are mixed, reflecting limited project duration and resources and inherent challenges in the sustainability of direct assistance activities.

As noted above, the DAC sustainability criteria focuses on the extent to which the benefits of a programme continue after funding has ceased. In elaborating on this criteria, OECD/DAC refers to the “continuation of benefits after *major* development assistance has been completed” (emphasis added). Although, when taken as a whole, ECAST project funding of USD 1.4 million may be considered a relatively large investment, the allocation of these resources across a range of activities has limited the investment in any particular area. Given the size of project budgets to individual areas and the project timeframe, stakeholders acknowledge that the achievement of sustainable outcomes is extremely challenging.

Against this background, there are a number of factors that have facilitated or hindered the sustainability of project activities. Most obviously, the provision of direct assistance to migrants was a major component of the project. This type of assistance requires funding for as long as there is a target group in need.²⁵ With no imminent prospect of the costs of such assistance being picked up by the host government, direct assistance activities will continue to require considerable external funding for the foreseeable future.

For direct assistance, the concept of sustainability is perhaps more usefully applied to individual direct assistance cases, in the form of durable solutions for those assisted. The

²⁵ On average, 50 people queue up outside IOM daily. IOM staff is able to perform approximately 30 intakes per day.

project document identifies the importance of durable solutions for migrants, and IOM staff were able to elaborate the targeted durable solution with respect to AVR migrants as reintegration in the home countries with a sustainable livelihood. IOM is working to follow up and verify achievements of these solutions.

In terms of the other outcomes areas of the project, the project document makes no reference to sustainability. IOM has, however, adopted two strategies to promote sustainability. First, within its overall country strategy, IOM looks combine the use of resources across different projects. Combined with its horizontal management approach, this assists the organization to extend activities beyond the specific timeframes of individual projects and thus provide more time and resources towards the achievement of sustainable outcomes.

Second, IOM has sought partnerships with local organizations in order to both engage local expertise and increase the potential for benefits to continue beyond the project. This approach has yielded mixed results. Most promising has been the reported outcomes of IOM's association with the Egyptian Export Council for Handicraft (EECH) for the implementation of livelihood training activities in Aswan and in the Red Sea governorates. EECH is a national semi-government organisation that aims to increase Egyptian exports while preserving Egyptian craft. Through an agreement signed in October 2014, ECAST supported activities aimed at helping beneficiaries produce handicrafts primarily for the tourism market, which since project inception has been in major decline. These included: undertaking a baseline study on the economic, social and technical situation of artisans in these areas; providing NGOs with tools and equipment; and the provision of advanced training in sewing and pattern making to 53 people, as well as on packaging and new products design; and the introduction of new crafts to enhance the capacities of the artisans to generate income, for example through accessories and jewelry making. EECH was also contracted to upgrade the NGOs commercial outlets.

EECH was able to mitigate the potential effects of the decline in tourism on the future livelihood of beneficiaries by expanding and diversifying the market for the handicrafts produced by the training graduates. At the end of the agreement with IOM, the organisation: (1) secured a commission for handicrafts and decorations produced by the beneficiaries of these trainings by a hotel in the area; (2) established a business relationship between the trainer (also a commercial designer) and the beneficiaries, through which the trainer commissions work from this group; and (3) showcased the handicrafts produced at a Dortmund Fair Trade event in 2015, during which all samples were bought by fair trade shops attendance. The EECH expects more orders from these fair trade shops. In addition, while the original training and equipment (sewing machines) were aimed at production for the tourist market, the provision of transferable skills and equipment allow beneficiaries to use them in other areas, such as tailoring. Thus, the engagement of EECH, and the way the organization has approached the assignment has made it likely that skills and equipment provided to beneficiaries will provide sustainable employment well beyond the project.

With regard to the other livelihood component, supported by ETP, IOM has made an effort to monitor whether those who benefited from the training were still employed at the time of the evaluation. The ETP component also includes a Training of Trainers activity. One IOM staff member considered the activity sustainable as it is located at a training school and stated that:

The location of the centres within a tourism school does guarantee sustainability combined with the ToT on management provided to the school management team to

ensure they have the capacity to maintain the centres, as well as a ToT (certified by ETP) for selected school trainers. This does not only allow them to provide trainings within the centres for school students, but also to be called on by ETP to provide trainings within the framework of other projects.

Another staff member, however, questioned the sustainability of this and other livelihood activities supported by the project. At present, no strategy is in place for assessing whether trainers have the capacity to undertake their own trainings, assisting them to do so, or identifying the resources that might allow further trainings.

In terms of resources that will continue to be available following the completion of the project, stakeholders highlighted the paper on anti-smuggling legislation, the promotion of the awareness raising strategy and associated materials, and the working group on unaccompanied child migrants, as likely to generate ongoing benefits.

In summary, the concept of sustainability as defined by OECD/DAC is difficult to apply in the context of a project involving many different components over a relatively short timeframe. While the project document does not specifically elaborate on how the project pursued sustainability as an objective, IOM has made efforts to work with and through Government institutions, monitored the sustainable reintegration of AVRR recipients, supported local organizations where possible and supported resources and mechanisms that offer potential benefits beyond the life of the project.

4. Conclusions and recommendations

4.1 Conclusions

The ECAST project aimed to assist the Government of Egypt and civil society to protect the rights of vulnerable migrants and prevent smuggling and trafficking flows to and from Egypt. The project took place in a particularly challenging context, incorporating (1) increased and changing migration flows with an accompanying increase in support needs for vulnerable migrants; (2) ongoing changes within government structures and staff; and (3) major security concerns that affected project approvals, NGO engagement and data collection. As a result, not all activities were able to be implemented as planned and/or within the intended timeframe. Against this background, this section on concluding comments and recommendations focuses on issues that are potentially within the control of IOM (and in some instances, USAID as the donor).

The evaluation identified a number of shortcomings in project design relating to: (1) a lack of clear linkages between activities, outputs, outcomes and objectives; (2) a failure to identify key assumptions and risks; and (3) indicators that were not SMART, that is specific, measurable, attainable, relevant, and time-bound. Further, the project design attempt to cover all of the '4Ps' led to a very broad range of activities across a wide number of stakeholders. Many of these activities were stand alone in nature rather than components of an overall project strategy. For example, as highlighted in the discussion of NCCPIM's actions to implement the awareness strategy (Finding 10), livelihood development and awareness raising activities can be mutually reinforcing. The project design did not, however, draw a linkage between its awareness raising and livelihood development activities.

Similar project design issues have been identified across other IOM organisational and project evaluations, suggesting that IOM's current work to strengthen design processes should be continued. The funding of designs that carry the same shortcomings as have been constantly noted in the past also suggests a possible organisational learning point for the donor.

Activities supported across the ECAST project's five outcome areas can be divided into five types: direct assistance (including AVRRI); promotion of livelihood development; awareness raising for the media and youth; capacity building for the government in migration-related laws and policy; and training for prosecutors. Evaluation respondents across all stakeholder types considered that IOM had a clear comparative advantage in direct assistance and in providing advice and advocacy on migration-related laws and policies. These are areas in which IOM is able to draw on global and local expertise, experience and resource materials.

Stakeholders both within and outside IOM were less convinced of IOM's comparative advantages in the areas of livelihood development and criminal justice training. While respondents acknowledge that IOM's work in prosecutorial training responded to a clear gap, they highlighted that livelihood development was already being addressed by other organisations with clearer expertise in this area and on a much larger scale. Further, there is little evidence to support the idea that livelihood development on a scale implemented by the ECAST project can impact meaningfully on irregular migration, particularly when implemented as a stand-alone activity.²⁶ Local IOM staff, however, do consider that while

²⁶ This issue has been acknowledged by senior IOM staff and raised in previous IOM evaluations. See for example, Berman, J. and P.Marshall, (eds), Evaluation of the International Organization for Migration and its Efforts to

'[...] departures from Egypt as a whole will not be impacted, at the local level these interventions can impact rates of irregular migration.'

The strongest aspect of the project, as highlighted by stakeholders, related to direct assistance and the work undertaken by IOM through different projects to support the advancement of Government responses to irregular migration, particularly with regard to the new anti-smuggling legislation and responses to the issue of unaccompanied migrant children in Egypt. This is in keeping with findings from evaluations of other organisations as to the value of a concerted strategic focus on a specific activity area.

IOM staff consulted in the evaluation expressed the view that many of the projects implemented by the organisation would benefit from a narrower, more strategic and more cohesive approach. As highlighted earlier, an example of what a more strategic approach might mean in practice was provided by the new awareness raising strategy supported by the project for use by both NCCPIM and IOM. The strategy highlights the importance of a cohesive approach, involving messaging with clear and realistic openings for action, and complementary activities to remove barriers to, or provide incentives for, this action.²⁷

IOM's horizontal management structure, where staff engage by activity area rather than project, can facilitate a more strategic approach to programme implementation across individual projects. Strengthening of the current country strategy, with a view to setting more specific measurable goals might further assist in facilitating more strategic programme implementation. Alongside its advantages, IOM's horizontal management approach also creates risks in the cohesiveness of project management relating to linkages between individual project components and project monitoring and reporting.

In terms of sustainability of project outcomes, IOM did not include a discussion of sustainability issues in the project document. However, the draft anti-smuggling law, the working group on unaccompanied migrant children and the project's work in promoting the awareness raising strategy, offer the potential for significant additional and on-going benefits. The draft anti-smuggling law, if passed, has the potential to provide a new normative framework for the treatment of irregular migrants by clarifying that the irregular nature of their migration does not make them criminals. The UMC working group provides an important starting point to promote much needed government work in the area of unaccompanied minors.

The awareness strategy, if implemented appropriately, could bring to bear what is a vast amount of accumulated knowledge in the field of behavioural communications, thus (1) maximising the potential for effective outcomes and (2) reducing investment in stand-alone activities, which previous evaluations have suggested yield limited return on investments.

With regard to criminal justice interventions, there is no clear evidence to show that ad hoc capacity building exercises are having an impact (either in terms of prosecutions of traffickers, nor in terms of victims identified and assisted). IOM should consider building on

Combat Human Trafficking, Norwegian Agency for Development Cooperation, <https://www.norad.no/en/toolspublications/publications/2011/evaluation-of-the-international-organization-for-migration-and-its-efforts-to-combat-human-trafficking/> Oslo, 2011.

²⁷ A recent study by the Inter-Agency Coordinating Group on Trafficking has highlighted the lack of any evidence for a return on the large investment in awareness raising activities to date, citing a failure to apply basic knowledge in the field of communications, in particular that stand-alone awareness raising is almost invariably ineffective (ICAT. Issue Paper No. 2 Pivoting toward the Evidence: Using accumulated knowledge and a shared approach to monitoring, evaluation and learning to build effective counter-trafficking responses, forthcoming).

previous systematic interventions, including with regard to institutionalisation of training through introduction of the training curricula into training academies. A key aspect of effective capacity building, which should be reflected in future project designs, is the identification and the addressing of barriers to acquired training skills being put into practice.

IOM staff involved in direct assistance report that they regularly identify trafficked persons among those requesting their services. However, at present the Government has no operational shelter. This results in many victims being unable to access their entitlement to protection and services. It is thus urgent that a shelter is established to address this severe gap. However, learning from the previous shelter experience, it is equally imperative that the Government clearly defines rules, operations and minimum standards and that regular and thorough reviews and assessments of operations are conducted. This would include regular interviews with clients and staff as well as systematic collection of feedback and client satisfaction forms.

4.2 Recommendations

This section discusses primary, crosscutting recommendations that follow from the findings in Section 3. There are eight recommendations for IOM. In keeping with the emphasis of the findings, the recommendations largely focus on issues around project design (five recommendations) and project management (one recommendation). There are two additional recommendations with a programmatic focus. There are also three recommendations for USAID as the project donor, which seek to complement and reinforce the recommendations for IOM. The recommendations are not in order of priority.

1. Project design

The evaluation identified a number of shortcomings in project design. There are thus five specific recommendations for strengthening project design. These recommendations are:

Recommendation 1: *IOM Egypt should continue its existing initiatives towards ensuring that project designs and project results matrices demonstrate clear linkages between activities, outputs, outcomes, objectives and indicators.*

Recommendation 2: *IOM Egypt should ensure project designs better reflect accumulated knowledge, lessons learned and the findings and recommendations of previous evaluations.*

Recommendation 3: *IOM Egypt should review its current livelihood development approach with a view to articulating the organisation's comparative advantage in this area, and consider the benefits of partnering with longer standing programmes and with more resources*

Recommendation 4: *In developing new projects, IOM Egypt should consider the potential for a more strategic focus on a narrower set of activities.*

Recommendation 5: *IOM Egypt should consider including in all its projects in Egypt: (1) a detailed risk assessment and (2) a risk management and contingency plan.*

2. Project management

As documented throughout this report IOM's has a horizontal management approach, in which staffing resources are allocated primarily according to activity type rather than to specific projects. This approach allows IOM to promote complementarity between projects, and staff to focus on their areas of experience and expertise. Evaluation data suggest, however, the IOM could do more to limit the risks this approach presents for the management of individual projects. With this in mind, the recommendations in relation to project management are:

Recommendation 6: *IOM Egypt should consider how best to ensure that project reporting clearly and consistently shows progress made by, and attributable to, each project towards the achievement of its specific objectives*

3. Programmatic follow-up

IOM supported the development of three key papers during the life of the ECAST project. The first, directly supported by the project, is the policy advisory paper to support the development of the new anti-smuggling law. The draft law is now under consideration. The second is the awareness strategy, which the ECAST project helped to take forward through the development of the fact sheets on irregular migration patterns and responses, and discussions with NCCPIM on follow-up. The third paper is the assessment of the NCCM shelter for victims of trafficking. The ECAST project supported the shelter prior to its closure. The assessment, supported by a complementarity project, provides important guidance for issues to be addressed in the operation and management of future shelters. To build on these latter two papers, recommendations with regard to programmatic follow-up are:

Recommendation 7: *IOM Egypt should ensure its future awareness raising activities are consistent with, and draw on, the awareness raising strategy outlined in the Public Awareness and Communication study supported by IOM.*

Recommendation 8: *IOM Egypt should continue to advocate with the Government to re-establish a shelter for trafficked persons, ensuring that the shelter is appropriately staffed with trained personnel, is operated in accordance to minimum standards and that shelter management and operations are regularly reviewed and assessed*

As part of the minimum standards, IOM should support the government to develop a formal feedback system from victims on the services provided.

4. Donor recommendations

The number of migrants on the move in the region and in Egypt has increased significantly over the past years and it is likely that it will continue at least in the short to medium term. It is also unlikely that the GoE will be able to respond to such numbers and diverse need in the near future without external assistance. It is foreseeable that demand for IOM assistance and services will remain significant in the next years. Yet, thus far IOM's ability to provide direct assistance and AVRR has been dependent on, and conditioned by project funding.

With this in mind, USAID and other donors play a crucial role in supporting the rights of trafficked persons and vulnerable migrants. At present the projectized nature of funding makes it difficult to plan and leads not only to uncertainty of funding but also to

inconsistencies, such as in the size of AVRR financial assistance (from USD 1030 envisaged under US-funded projects to USD 5000 envisaged by Dutch funded projects) and project duration (from 12 months to 5 years).

As well as the potential for increased donor cooperation to address these issues, there may be scope for increased joint advocacy, for example, in relation to the government's responsibility to provide an appropriate shelter for trafficked persons. Beyond this, USAID might consider how to tighten its own project approval procedures to assist the implementing agency to identify and address project design issues prior to implementation.

Recommendation 9: *USAID should consider working with other donors to support a coordinated and strategic approach for funding migrant assistance initiatives.*

Recommendation 10: *USAID should consider strengthening its project proposal review processes to ensure clarity of project logic and that indicators are specific, relevant and achievable.*

Recommendation 11: *USAID should assist organizations to ensure project designs better reflect accumulated knowledge, lessons learned and the findings and recommendations of previous evaluations.*