



USAID
FROM THE AMERICAN PEOPLE



EVALUATION

Midterm Performance Evaluation of the Actions for Combating Trafficking in Persons (ACT) Project

July 2013

This publication was produced at the request of the United States Agency for International Development. It was prepared independently by Susan Kreston, I.J.M. Ifajul Chowdhury and Naim Mostofa of Social Impact, Inc.

Cover Photo: From Sandra Basgall, Chief of Party of Bangladesh Democracy and Governance Performance Evaluations (BDGPE) Project

MIDTERM PERFORMANCE EVALUATION OF THE ACTIONS FOR COMBATING TRAFFICKING IN PERSONS (ACT) PROJECT

July 2013

USAID Contract AID-OAA-I-10-00003

Task Order AID-388-TO-12-00001

DISCLAIMER

The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

CONTENTS

- Acknowledgments iii
- Acronyms iv
- I. Executive Summary..... vi
- II. Introduction..... I
- III. Development Problem and USAID Response 3
- IV. Evaluation Purpose and Evaluation Questions..... 7
- V. Evaluation Methodology and Limitations 9
- VI. Findings..... 11
- VII. Conclusions 25
- VIII. Recommendations..... 31
- XI. Lessons Learned..... 33

TABLES AND FIGURES

- Figure 1: ACT Results Framework, modified March 2013..... 4
- Figure 2: Map of site visit locations in Bangladesh..... 6
- Table I: Number and Nature of Capacity Building Training and Orientation Sessions organized by ACT/WI..... 20

ANNEXES

- Annex I: Evaluation Statement of Work..... 35
- Annex II: Persons Contacted 47
- Annex III: References..... 53
- Annex IV: Data Collection Tools..... 55
- Annex V: Disclosure of Conflict of Interest..... 60

ACKNOWLEDGMENTS

The Team Leader would like to thank her team members, I.J.M. Ifajul Chowdhury (National Trafficking and Evaluation Specialist) and Naim Mostofa (National Research Specialist) for their insight, support and assistance during this project. Their contribution to this project is incalculable. She would also like to thank all the staff at Social Impact (SI) Dhaka: Sandra Basgall, Chief of Party; Saiful Islam, Deputy Chief of Party; Md. Pervez, Operations Manager, and Motiar Rahman Ripon, Proprietor, R.S. Enterprise.

The staff at SI in the United States must also be thanked for all their support before and during the evaluation. Particular thanks go to Senior Technical Advisor James Fremming, Program Manager Melissa Chiappetta, and Program Assistant Kathryn Bashour for always being there to share an idea or lend a hand.

Thanks also go to Rumana Amin and Habiba Akter at USAID who helped in making this evaluation run as smoothly as possible.

Finally, thanks to all those who gave their time and information to this evaluation. Without the input from all those interviewed, this evaluation would not have been possible.

ACRONYMS

ACT	Actions for Combating Trafficking in Persons
BAIRA	Bangladesh Association of International Recruiting Agencies
BMET	Bureau of Manpower, Employment and Training
BNWLA	Bangladesh National Women Lawyers' Association
CBO	Community Based Organization
CEDAW	Convention on Elimination of All Forms of Discrimination Against Women
COP	Chief of Party
CRC	Convention of the Rights of the Child
CTI	Counter-Trafficking Intervention
DAM	Dhaka Ahsania Mission
DEMO	District Employment and Manpower Office
DO	Development Objective
DRG	Democracy, Human Rights and Governance
FGD	Focus Group Discussion
GOB	Government of Bangladesh
IEC	Information, Education and Communication
INGO	International Non-Governmental Organization
IO	Intergovernmental Organization
IOM	International Organization for Migration
IRs	Intermediate Results
KII	Key Informant Interviews
MOU	Memorandum of Understanding
MOEWOE	Ministry of Expatriate Welfare and Overseas Employment
MOHA	Ministry of Home Affairs
MOWCA	Ministry of Women and Children's Affairs
NPA	National Plan of Action (on Trafficking)
NGO	Non-Governmental Organization
PP	Public Prosecutor
PROYAS	Proyas Manobik Unnayan Society
RJ	Rights Jessore
RMMRU	Refugee and Migratory Movement Research Unit
SHISUK	Shikkha Shastha Unnayna Karzakram
SP	Superintendent of Police
TIP	Trafficking in Persons
TOR	Terms of Reference
TOT	Training of trainers
UAE	United Arab Emirates
UNICEF	United Nations Children's Fund
UNODC	United Nations Office on Drugs and Crimes
USAID	United States Agency for International Development
US DOS	United States Department of State
VTF	Vigilance Task Force
WI/ACT	Winrock International/Actions for Combating TIP program

YPSA

Young Power in Social Action

I. EXECUTIVE SUMMARY

EVALUATION BACKGROUND AND PURPOSE

Bangladesh continues to face the challenge of Trafficking in Persons (TIP) and its related population effects. These problems are exacerbated by the large role that remittance plays in the Bangladesh economy and high numbers of migrant workers who may be placed at risk from trafficking. Bangladesh is primarily a source and transit country in regards to TIP with most victims trafficked abroad for commercial sexual exploitation, involuntary domestic servitude, and other forms of forced labor, though internal trafficking is also present.

In 2011, Bangladesh was ranked as a Tier 2 Watch List country for the third year in a row by the U.S. Department of State. The absence of a comprehensive national law against human trafficking and a failure to make significant inroads in addressing labor trafficking prosecution identified are the primary reasons for the consistently low ranking. In 2012, Bangladesh was upgraded to Tier 2 (off of the Watch List) and continues to hold that ranking in the 2013 TIP Report, in part due to its enactment of comprehensive legislation in December 2011 as well as the Government of Bangladesh's (GOB) National Plan of Action for Combating Human Trafficking 2012-2014.¹

With a view to the aforementioned, United States Agency for International Development (USAID)/Bangladesh is funding a six-year (2008-2014) initiative entitled “Actions for Combating Trafficking in Persons (ACT).” The specific program objectives are organized around the three central pillars of anti-trafficking programs: prevention, prosecution, and protection initiatives and are as follows:

1. To reduce the rate of Trafficking in Persons and unsafe labor migration within and from Bangladesh;
2. To enhance and standardize the protection and care of victims of trafficking and labor migration abuses; and
3. To strengthen the Government of Bangladesh’s capacity to prosecute traffickers and trafficking-related crimes while improving overall rule of law and human security.

The objective of this performance evaluation is to assess the impact and lessons learned to date from ACT for consideration in the remaining year of the program as well as in the design of any follow-on program that might occur.

¹ Department of State, Trafficking in Persons Report: 2012, Country Narratives: Bangladesh, p 81, available on-line at <http://www.state.gov/documents/organization/192594.pdf>.

METHODOLOGY

The Evaluation Team was comprised of one international TIP expert (Team Leader) and two national experts in TIP and/or evaluations. Principle data sources were three-fold: documents; informant interviews; and field visits to ACT program sites. The rapid appraisal methods were: literature and document review; semi-structured interviews; and focus group discussions. The sampling sought to reflect geographic diversity (capital, coastal, and border locations) as well as an array of stakeholders reflecting those involved in all aspects of the program: prevention of trafficking; prosecution of trafficking; survivor support; and legal reform.

The Team did encounter constraints and limitations. During the data collection period, political instability was a constant factor, as were hartals (general strikes), scheduling difficulties prevented some data collection (key informants out of country/unavailable due to time conflicts/hospitalization), and natural disaster delayed key meetings (cyclone). Time constraints and geographic limitations were also present. Optimally, multiple interviews of informants and a full program site visitation would have occurred. However, the Team did conduct approximately 175 interviews, comprised of key informants and/or focus group discussion participants in three key ACT locations (Dhaka, Cox's Bazar, and Jessore), representing all the pillars of the ACT program - prevention, prosecution, legal reform and protection.

FINDINGS

The evaluation looked at eight key questions provided in the Scope of Work (SOW) (see Appendix I).

(1) Relevance. Counter-trafficking programs, and ACT in particular, are extremely relevant to Bangladesh's current development circumstances, though the three pillars of the program (prevention, prosecution, and support services for survivors) are being administered separately which does not fully optimize and integrate counter-trafficking resources. The subsequent addition of a fourth pillar, legal reform, was a timely and extremely relevant component to the program.

(2) Results. The prevention component, largely an awareness raising campaign, has reached a wide audience. However, a lack of depth, clarity, and retention of the counter-trafficking information was noted. Many respondents could not properly define trafficking nor distinguish it from other (potentially related) activities such as exploitative labor practices. The prosecution component has been able to provide training to a small but targeted number of professionals in the allied criminal justice community, and administrative obstacles in providing training to police in particular was noted by the Team. Concern regarding overlapping of training provided by ACT and training provided by other organizations was remarked upon repeatedly. Survivor services were provided to both male and female survivors of TIP though some key publications have been left until the end of the program such as a comprehensive guideline for survivor services, undermining the ability to assess the new guidelines when applied in the field. Finally, the passage of a comprehensive trafficking law, as well as an accompanying national plan of action, was achieved as well as participation in additional related (emigration) legislative drafting.

(3) Management and Administration. Stakeholders were generally pleased with both the effectiveness and flexibility in obtaining program results. Ability of management to adapt to new circumstances was cited as a positive aspect of the program. Turnover within implementing partner (IP) Winrock International (WI), however, in particular the position of Chief of Party (COP), was cited as giving rise to difficulties in continuity of vision as well as project focus and efficiency from one COP to the next.

(4) Client Satisfaction. Stakeholders and beneficiaries expressed overall satisfaction with ACT, in terms both of personnel and programming. Some areas of survivor service provision were critiqued and alternatives were offered for a more responsive system to these individuals.

(5) Performance Measurement System. The tracking, monitoring, and reporting of ACT results was generally seen as not unduly onerous, generally being provided by sub-grantees to WI on a monthly basis. A new system of monitoring that is result oriented rather than activity oriented has only recently been implemented. Additionally, reporting by WI to USAID will now be quarterly not semiannually. The ACT monitoring system provides data and information to GOB monitoring systems in two principle ways: information provided being incorporated into the Police Database at the TIP Monitoring Cell and through inclusion in the annual GOB Bangladesh Country Report - Combating Human Trafficking.

(6) Cross-cutting Issues: Gender and Disability. Gender issues have been integrated into ACT through expansion of legal definition of TIP to include both men and women. The attempt to eradicate gender bias in the new TIP law was largely successful, though not entirely. It is a unique feature of this project that a good deal of its gender sensitization has been to expand the understanding of trafficking to include male survivors. The public-awareness campaigns reflect this expanded gender concept. The inclusion of disability issues is more problematic. Many sub-grantees and other interviewees stated there were no disability components in their particular program but would deal with its presence on a case-by-case basis or through referral to organizations better equipped to deal with disabled persons.

(7) Synergy. While there are a number of opportunities for synergy with other USAID programs, such as Education, Health, and Economic Growth as well as other Democracy and Governance (DG) projects, currently little synergy exists. USAID Health does have a small role in ACT survivor services provision, but many opportunities have not been maximized for additional integration of TIP into other programs within USAID.

(8) Sustainability. Certain activities may eventually be able to continue without ACT funding and facilitation. However, capacity building interventions are vulnerable to turnover in personnel. With successful impacts on mobilizing volunteers as well as incorporating training modules into existing police/prosecution/judicial professional training materials, public awareness, and advocacy efforts initiated by ACT could continue.

CONCLUSIONS

The program has remained relevant throughout its tenure thus far and the belated (post-original SOW drafting) inclusion of a legal reform component to the original

Prevention/Prosecution/Protection pillars allowed for a timely and important area of counter-trafficking work to be included in ACT. The results have thus far also been generally positive, though there are areas which should be shored up during the remainder of the program to ensure optimal results such as public awareness programs reinforcing and clarifying basic messages, most importantly the definition of TIP and how it differs from other potentially related concepts such as unsafe migration or exploitative labor practices.

The management and administration was generally viewed in a positive light though repeated changes in key personnel were seen to be disruptive. Client satisfaction was also generally high, but there were program facets that were specifically pointed out as being in need of change. Performance measurement systems, i.e. tracking/monitoring/reporting, were not seen to be too onerous and did result in some changes to program design. A new reporting scheme has just been put into place, shifting from activity-based to result-based reporting, but it is too recent to assess this in this evaluation. Additionally, the information gained through the reporting/monitoring system feeds into two key GOB components: the police database and the annual GOB TIP report. However, the police database only reflects those cases which are going through the criminal justice system, leaving a large number of cases uncounted and therefore, invisible.

The cross-cutting issues of gender and disability were observed to be handled very differently. While gender has been a focal point of all program components (awareness campaigns, prosecution, survivor services, and legal reform), properly responding to issues of the differently able has not been so thoroughly integrated into the program. Some synergy with other USAID programs does exist at present, but there is room for far greater integration of TIP into other USAID programs. Sustainability may be achieved through some of the efforts to incorporate ACT programs, such as training, into existing GOB programs; however, other aspects, such as victim rescue, will not be able to become self-supporting. The issue of personnel turnover may also impact negatively on sustainability.

RECOMMENDATIONS

The following recommendations are offered for the remainder of the program:

- Expend prevention/public-awareness resources on reinforcing/clarifying the basic concepts and definition of TIP under the Palermo Protocol and/or the new legislation, and how TIP differs from other related but separate concepts.
- Offer trainings under the prosecution pillar and avoid simply providing "orientations."
- Finalize the survivor services standards and if possible, roll them out in the remaining time left to see how they function and where there may be challenges in applying them in the field.
- Solidify law reform efforts around information dissemination and addressing challenges found in the new TIP legislation and the National Plan of Action leaving other legislation (such as the emerging emigration legislation) for future programs.
- Prioritize the pending research project on prevalence of TIP in Bangladesh and finalize and disseminate it, preferably in accredited journals that would share the information among a wide audience.

II. INTRODUCTION

Migration has increased in the wake of globalization, and the 1970s witnessed the rapid expansion of international labor migration against the wider context of the “new” globalization. It expanded the migratory streams of unskilled temporary workers and illegal or irregular migrants, as well as the growth of networks and kinship relationships among migrants. Trafficking, which is very much linked to exploitative gender relations, is a specific form of illegal migration. Within the Bangladesh context, trafficking has historically been applied exclusively to women for purposes of forced prostitution/sexual exploitation. As migrants, men were also abused and exploited; they were lured and deceived, but were not identified as being trafficked. Human trafficking, whether within or across borders, is inextricably linked to forced or fraudulent migration of people where the purpose of this crime is primarily forced sexual exploitation or forced labor; however, other forms of exploitation also exist. Irregular migrants are an at-risk population for human trafficking. A significant number of Bangladeshi trafficking victims are men recruited for overseas work with fraudulent employment offers; these men are subsequently exploited under conditions of forced labor or debt bondage.

Bangladesh is a source country for men, women, and children subjected to forced labor and sex trafficking. Bangladeshi men and women migrate willingly to Saudi Arabia, Bahrain, Kuwait, the United Arab Emirates (UAE), Qatar, the Maldives, Iraq, Iran, Lebanon, Malaysia, Singapore, Europe, and other countries for work, often legally via some of the more than 1,000 recruiting agencies belonging to the Bangladesh Association of International Recruiting Agencies (BAIRA). These agencies are legally permitted to charge workers recruitment fees that are the equivalent of a year’s salary, but they often charge additional amounts in contravention of government regulations. These exorbitant fees place migrant workers in a condition of debt bondage in which they are compelled to work out of fear of otherwise incurring serious financial harm. Many Bangladeshi migrant laborers are victims of recruitment fraud including additional and illegal exorbitant recruitment fees, often accompanied by fraudulent representation of terms of employment. These victims may also experience restrictions on their movements, nonpayment of wages, threats, and physical or sexual abuse.

Bangladeshi children and adults are trafficked internally for commercial sexual exploitation, domestic servitude, and forced and bonded labor, including forced begging. In some instances, children are sold into bondage by their parents, while others are induced into labor or commercial sexual exploitation through fraud and physical coercion. Girls and boys as young as eight years old are subjected to forced prostitution within the country, living in slave-like conditions in secluded environments. Trafficking within the country often occurs from poorer rural regions to cities. Internationally, women and children from Bangladesh are trafficked for both commercial sexual exploitation and forced labor.

In 2005, the Government of Bangladesh (GOB) began to publish annual reports on Trafficking in Persons (TIP). This reflected the growing concerns regarding TIP and the desire to understand its dynamics and eradicate it in practice. Domestic and international organizations began to look at the problem and try to counter it. By 2008, Bangladesh was ranked as a Tier 2 Watch List country (and this ranking would continue for another three years) by the U.S. Department of State, with the absence of a comprehensive national law against human

trafficking and a failure to make significant inroads in addressing labor trafficking prosecution identified as the primary reasons for the low ranking.

The rise in domestic awareness and desire to confront TIP, coupled with a need to improve its international standing, served as the fertile ground upon which the Actions for Combating Trafficking in Persons (ACT) program was launched in 2008.

III. DEVELOPMENT PROBLEM AND USAID RESPONSE

Bangladesh is one of the poorest and most densely populated countries in the world. The role of remittance, defined as the return to Bangladesh of monies from work abroad, accounts for almost \$14 billion annually and cannot be understated in the Bangladesh economy. Remittance, migration, and trafficking potential are inexorably intertwined in the Bangladesh context.

Trafficking is a human rights issue, with a disproportionate number of its victims being women and children. In Bangladesh, women bear the brunt of many human rights violations, particularly at the community level where social norms prevent women from being able to access their full basic rights under international law. Trafficking has historically been identified exclusively with sexual exploitation or forced prostitution of women. However, forced labor is now considered an equally concerning facet of human trafficking. The realization that men, as well as women and children, may be victimized by both sexual and labor exploitation is now also beginning to take root.

Poverty is a key risk factor for victimization of Trafficking in Persons (TIP), as are gender inequality and violence against women, the devaluation of children, political instability, natural disasters, limited educational opportunities, and unemployment/underemployment. All of these are present in Bangladesh.

United States Agency for International Development's (USAID) Democracy, Human Rights and Governance program (DRG) works to reduce the prevalence of human trafficking and to increase the respect for workers' rights. Within this context, the ACT program was conceived.

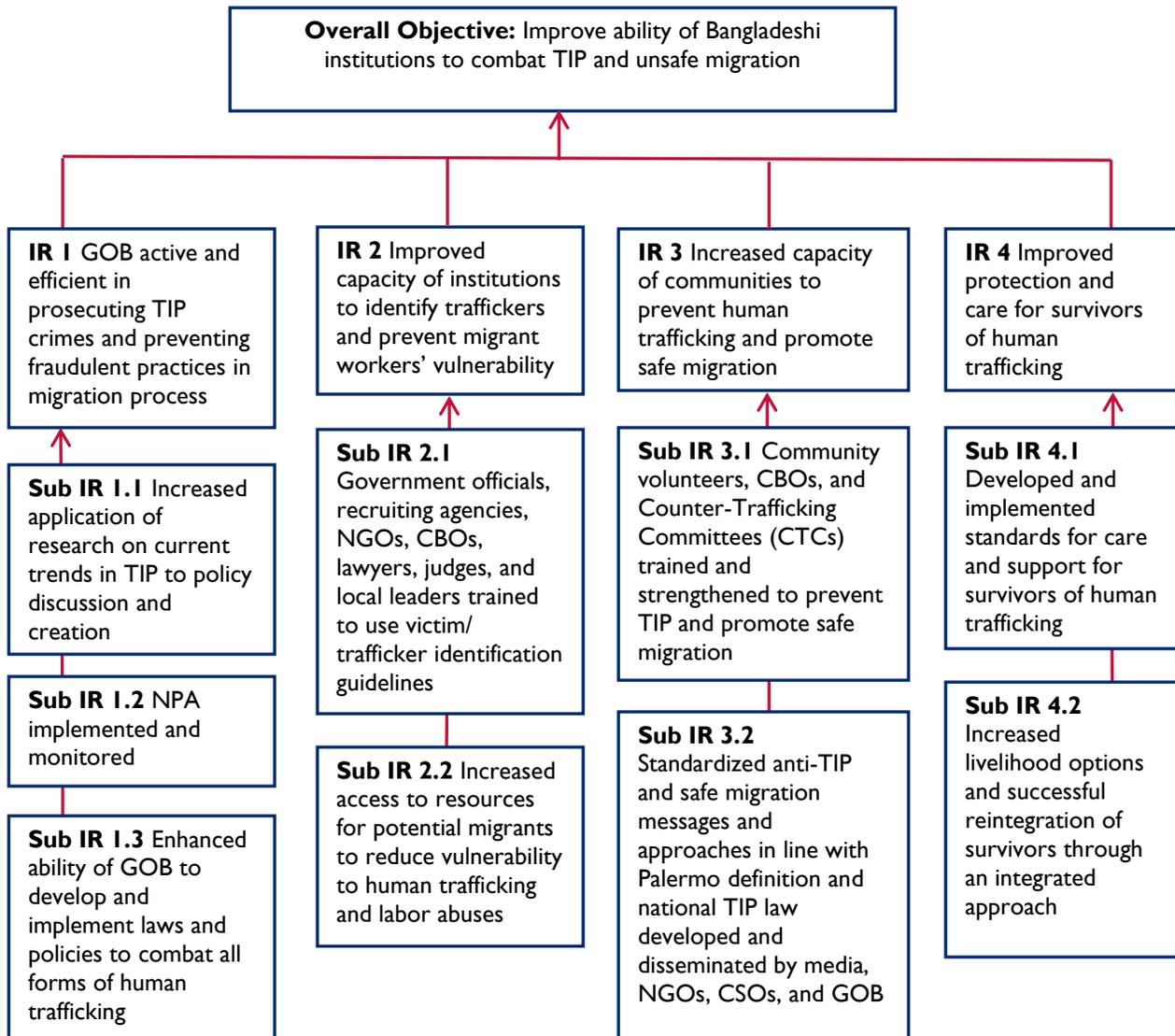
Since 2000 and prior to ACT, USAID/Bangladesh has been working with existing anti-trafficking initiatives by supporting civil society coalitions, local Non-Governmental Organizations (NGOs), and human rights organizations to conduct prevention and awareness campaigns throughout the country. In 2005, USAID began the comprehensive Counter-Trafficking Intervention in Prevention, Protection, and Prosecution for Victims of Trafficking in Persons (CTI) project, implemented by the International Organization for Migration (IOM) in partnership with seven local NGOs.

The ACT program contributes to USAID's Development Objective (DO) of Increased Citizen Confidence in Governance Institutions. USAID/Bangladesh's DO is dependent on the achievement of intermediate results (IRs), including Improved Access to Justice. The ACT program directly contributes to Improved Access to Justice through the Improved Protection of Civic and Human Rights. To improve protection of civic and human rights for TIP victims in Bangladesh, the ACT program works through four components necessary for addressing the issues of TIP: policy, prevention, protection, and prosecution. The Program intends to achieve the overall goal of strengthening institutions' ability to combat TIP and unsafe migration through these four components.

Originally envisioned as a four-year project (2008–2012), USAID allotted \$5.4 million to this project and through ACT sought to attack trafficking in persons through what were then the

classic pillars of counter-trafficking work: *prevention* initiatives, *prosecution* initiatives, and *protection* of survivors of TIP, generally referred to as “the 3 Ps.” The scope of work not only envisioned TIP specifically but also labor migration generally. (See Figure 1: ACT Results Framework, modified March 2013.) This framework demonstrates the recent change from an activities-based framework to a results-based framework.

Figure 1: ACT Results Framework, modified March 2013²



Each ACT pillar was addressed through local organizations with NGO status that dealt with one or more components of counter-trafficking work. USAID chose Winrock International (WI) as its implementing partner and signed a cooperative agreement with the organization. WI

² ACT Year 5 PMP, Winrock International.

agreed to oversee the entirety of the project and provide guidance to the sub-grantees in their work. Winrock International's ACT Program in Bangladesh supports the Trafficking in Persons and Migrant Smuggling Program Element (1.5.3) of the Transnational Crime Program Area (1.5) under the Peace and Security Objective of the Foreign Assistance Framework.

The sub-grantee organizations provided the following: prevention work, primarily in the form of public-awareness campaigns; prosecution support, primarily in the form of trainings and technical support to enhance the ability of GOB to prosecute this crime; and protection to survivors, primarily through shelter homes that (optimally) provided both immediate assistance and longer-term help such as educational assistance, jobs/skills training, or reintegration into the community. The inclusion of a prosecution component within this program was new to USAID, which traditionally works more with prevention and protection issues and leaves security jurisdiction to other players.

The prospect of an improvement in the legal environment related to TIP emerged halfway through the initial program (2010). The GOB, through the Ministry of Home Affairs, initiated the process to adopt a new comprehensive law against human trafficking. At the time the Cooperative Agreement was awarded, USAID had no knowledge of GOB's plan to draft this law. As a result, USAID revised the program's scope of work to include assistance to the GOB in the drafting of its law.

Through the above-mentioned activities under the ACT program, USAID/Bangladesh seeks to combat human trafficking in Bangladesh, enhance the protection of the victims, and improve victim care while strengthening the GOB's capacity to prosecute traffickers and trafficking-related crimes. In the long term, USAID TIP program will contribute to reducing transnational crime, benefit victims through legal and support services, and strengthen Bangladesh's ability to enforce relevant national laws and international treaties. Achievements under this initiative will also help create conditions for improved national and regional security.

The ACT project has a nationally representative presence working in five of the seven divisions of Bangladesh—Dhaka, Barisal, Khulna, Chittagong, and Rajshahi. The Team was based out of Dhaka, with site visits to Chittagong (Cox's Bazar) and Khulna (Jessore). The map in Figure 2 highlights the site visit locations.

Figure 2: Map of site visit locations in Bangladesh



IV. EVALUATION PURPOSE AND EVALUATION QUESTIONS

The purpose of this evaluation is to assess the impact and lessons learned to date from ACT for consideration in the remaining year of the program, as well as in design of a follow-on program, if appropriate. The performance evaluation of ACT will accomplish five central objectives:

1. Test the technical and programmatic validity of the hypothesis upon which the ACT program was designed;
2. Assess the efficacy, cost-effectiveness, and impact of the ACT implementation tools and management structure in meeting the objectives thus far;
3. Assess the current achievements of the ACT program in light of the findings/recommendations made by the initial WI assessment conducted at the outset of the ACT program;
4. Evaluate ACT implementers' performance to date and assess actual results against targeted results, determining whether the program is on course to meet those objectives; and
5. Make recommendations to USAID/Bangladesh concerning future programming.

This will be accomplished through examining specific areas of inquiry identified in the Scope of Work (SOW). Those areas are:

A. Relevance – To what extent are the project's objectives still relevant to the current development circumstances in Bangladesh and will they provide sufficient guidance for appropriate programmatic and technical assistance decisions?

B. Results – To what extent has ACT been successful in achieving program objectives?

The objectives of the program were also identified in the SOW.

1. To reduce the rate of trafficking in persons and unsafe labor migration within and from Bangladesh;
2. To enhance and standardize the protection and care of victims of trafficking and labor migration abuses; and
3. To strengthen the GOB's capacity to prosecute traffickers and trafficking-related crimes while improving overall the rule of law and human security.

C. Management and Administration – How effective and flexible has the ACT management structure (WI, its implementing partners, and USAID) been in obtaining program results, including capacity building of ACT implementing partners by WI?

D. Client Satisfaction – What are the opinions of direct beneficiaries, elected officials, local and regional government officials, media, civil society, and other stakeholders regarding ACT? Have there been any unintended consequences (negative or positive) for stakeholders/beneficiaries from the implementation of ACT?

E. Performance Measurement System – Has ACT’s M&E system been effectively used to track, monitor, and report results attributable to ACT activities, and what changes are required to make the performance management system more effective? How does the ACT monitoring system feed into the Government of Bangladesh (GOB) trafficking-monitoring systems?

F. Cross-Cutting Issues – How well has gender been integrated and disability issues been addressed by ACT’s interventions in the targeted areas? Are there any alternative approaches identified for greater impact?

G. Synergy with Other USAID and Donor-Funded Programs – How effectively has ACT coordinated with other USAID/Bangladesh programs (i.e., DG, Economic Growth, Population Health Nutrition and Education, and Food Disaster and Humanitarian Assistance) in achieving ACT objectives and contributing to other USAID/Bangladesh objectives?

H. Sustainability – How much progress is ACT making in establishing sustainability plans beyond USAID support? Are there any obstacles undermining the goal of sustainability, and what measures should be taken to enhance sustainability?

Interim evaluations examine a mixture of performance and process, as can be seen in the evaluation questions articulated in the SOW noted above. Evaluation questions on results, client satisfaction, and sustainability address performance aspects, while questions on management, administration, and the cross-cutting issue of gender address process or design aspects.

The audience of this midterm performance evaluation is USAID/Bangladesh, the Government of Bangladesh, USAID/Washington’s Office of Democracy and Governance, the Asia Bureau, and the Department of State’s Trafficking in Persons office.

V. EVALUATION METHODOLOGY AND LIMITATIONS

The data collection for this midterm evaluation took place between April 29, 2013 and June 20, 2013 in Bangladesh. Background data collection took place in Washington, DC on April 24, 2013 and April 25, 2013. This evaluation assessed the work implemented by ACT between the program's commencement in 2008 and mid-2013. The principal data sources were program documents, interviews in Dhaka, and field visits to programs in Jessore and Cox's Bazar. These sites were chosen to both obtain a nationally representative sampling and visit locations where all components of the program (prevention/prosecution/protection/legal reform and policy dialogue) were present in one location. In so doing, the Team hoped to obtain the most comprehensive, integrated view of the program.

The Evaluation Team began data collection in Dhaka and then, due to political instability in Jessore, divided into two teams: one traveled to Jessore and the other remained in Dhaka to conduct interviews. The Team planned to work in Satkhira after visiting Jessore, but the political instability prevented this site visit. At the final site, Cox's Bazar, the Team gained a coastal/port perspective. These sites represented only a part of all those found in the program, but time, resources, and safety concerns did not allow for more extensive site visits.

The rapid appraisal methods included ongoing literature and document review, semi-structured interviews (SSIs) of key informants (KIs), and focus group discussions (FGD). The question clusters used for the SSIs and FGDs are found in Annex IV. Sampling included both geographic diversity, reflecting the program's sites in Dhaka, Jessore, and Cox's Bazar, and stakeholders representing all components of counter-trafficking work: prevention, prosecution, survivor protection, and policy/legal reform. The more than 175 respondents covered a broad range of experience with this project, including the criminal justice community, survivor service providers, NGOs/INGOs, academics, national and local government officials, survivors, peer counselors, and sub-grantees representing all pillars of the program.

Each SSI differed depending on the key informant's role and involvement in the project and time available for interviewing. It must be noted, however, that many of the same questions were asked of all interviewees. These questions addressed not just knowledge and general perceptions but also looked for specific examples of prevention, prosecution, protection, and legal reform successes and challenges. The Team conducted focus group discussions with the same protocols to look at issues of relevance, results, and client satisfaction. Parallel analysis was also used to analyze the evidence from SSIs, focus group discussion, and the literature review, which contained program performance data in the form of PMPs, annual reports, and semiannual reports.

STRENGTHS

The strength of the methodology employed was that it allowed for sampling from a significant variety of regions/geographic areas and respondents. Respondents from the police, prosecution, judiciary, NGOs, IOs, implementing partners, academia, government (both national and local),

plus many others, such as survivors, volunteers, and direct beneficiaries, were all included in the sampling. The geographic sampling also allowed for a diversity of input, representing the capital, a coastal city with a port nearby, and an international border town.

LIMITATIONS

There are some general noteworthy limitations. Recall bias is a common evaluation problem, and response bias is a common problem for interim evaluations. Selection bias in the form of contacts provided by the implementers can mean that an evaluation team hears only from people with positive experiences. The Team used multiple respondents and documents to triangulate on evaluation issues, which is the most effective approach to combating most forms of bias. This method tempered any one piece of biased data so that it did not skew the analysis. Another approach that pertains specifically to interviews is the inclusion of key informant interviews (KIIs) from organizations that do not directly benefit from the evaluated program. In this evaluation, the Team sought out non-involved respondents to give impartial feedback on key areas of the program such as design, relevance, and results.

The evaluation encountered the specific, unique difficulties of serious political instability and time constraints, which limited the Team's ability to access the optimal number of interviewees and sites. The planned field visit to Satkhira was canceled due to political instability. To compensate for this exclusion, the Team conducted a site visit to Cox's Bazar. These constraints were aggravated by time lost in repeatedly rescheduling planned travel and the unavailability of interviewees during the data collection time period due to *hartals* (general strikes) and travel/schedule conflicts. The Team initially explored alternative options such as telephone interviews; however, a great number of key stakeholders, such as Ministry personnel, police, prosecutors, and judges, refused to engage in telephone interviews due to their professional rules and regulations. A national holiday and a cyclone also hindered planned data collection.

GAPS

The identified gaps were not being able to interview all sub-grantees and visit all sites. Only one IO refused to participate in the evaluation, citing lack of involvement in TIP activities generally and lack of knowledge of ACT in particular. Finally, previous key personnel, such as Winrock International (WI) Chief of Parties (COP), were unavailable for interview because they had left their positions.

VI. FINDINGS

Midterm evaluations examine a mixture of performance and process, as seen in the evaluation questions articulated in the SOW found in Annex I. Evaluation questions on results, client satisfaction, and sustainability address performance aspects, while questions on management, administration, and the cross-cutting issue of gender address process or design aspects.

PERFORMANCE FINDINGS

Prevention initiatives

One of the key objectives of the ACT program is to reduce the rate of TIP and unsafe migration within and from Bangladesh. This objective focused mainly on public-awareness campaigns, which targeted the community in general and at-risk individuals in particular. Four sub-grantees were specifically tasked with this initiative. The sub-grantees conducted courtyard meetings, school awareness programs, and other activities to attempt to disseminate information on TIP. A WI/ACT campaign entitled "Let's Fight Together Against Human Trafficking" was conducted via TV, radio, and distribution of printed educational materials on TIP. The sub-grantees were given technical assistance to accomplish these projects, and a website, newsletter, and media campaign were created. High-profile, anti-trafficking events were held and informational materials were distributed. The prevention component is now attempting to work with other components such as survivor services to address issues that follow from increased awareness, including reduction of survivor stigma and vulnerability of the most at-risk populations.

Those targeted by this program showed broad but apparently shallow improvement in TIP awareness, as evidenced by responses of interviewees from KIIs at the community level. As such, there is general satisfaction with ACT's efforts among the targeted groups, but the clarity of the message and its (correct) retention and further dissemination is questionable. When asked to define basic concepts in TIP, many interviewees were unable to provide a basic definition or understanding of what TIP is and how it is distinguished from other concepts such as exploitative or simply unsafe migration. The sub-grantees were appreciative of the technical support (knowledge transference/capacity building) they received from WI, and they applied concepts from the technical assistance sessions in the work environment.

The website and newsletters are maintained and distributed to cover a vast array of relevant information. Additionally, the number of website hits is now being tracked monthly; to date, approximately 7,500 viewers have come to the website. This reflects a positive trend over the last three years, as there were a total of 3,200 hits by the end of year three of the program and 5,300 hits total by the end of year four. However, from the home page, which is in English, the link to a Bangla translation is either missing or difficult to find. In certain sections such as legal materials, critical pieces of legislation are missing. Most importantly, the new Deterrence and Suppression of Human Trafficking ordinance is not there, even though it is present at other places on the website. WI information and education (IEC) materials are currently being reprinted in Bangla or bilingually with updated versions. Some respondents were aware that an ACT website exists but were unfamiliar with its exact content and purpose.

The media coverage of TIP and migration issues was monitored and tracked by sub-grantees and recording the articles is part of the reporting process from sub-grantees to WI. Sub-grantees were not, however, certain what the information was used for. The TIP prevention approach included journalist training; in the first four years of ACT, a target of training 205 journalists was set and 227 were actually trained. At the midpoint of year five, an additional 25 have received training. A target of 40 articles published by ACT-trained journalists was set over the course of the project to date, and 15 have been published as of the semiannual report of year five. Nine articles were published in year four, exceeding the target of five. In year five, three of five target articles have been published to date, so achieving the projected result is anticipated.

Journalists attend a short orientation (two to three hours) where they received broad, though arguably shallow, information on TIP. ACT-trained journalists produced a small number of articles, and the technical accuracy of the reporting in terms of correctly defining TIP and distinguishing it from other allied concepts ranged from very good to confusing. Authors tracked general reporting on TIP within Bangladesh during the data-collection period and noted a tendency to confuse TIP with other concepts throughout those articles. It appears that the ACT-trained journalists have a better grasp on the topic, though their reporting of basic information such as definitions is not always totally accurate or clear. When TIP is defined, neither the definition under the new law nor that under the Palermo Protocol is noted.

The prevention campaign contained very little information on true prevention initiatives such as poverty reduction, eradication/reduction of sexism, and better educational opportunities, and instead focused primarily on public awareness.

Prosecution initiatives

The second pillar of the program is prosecution of traffickers and trafficking-related crimes. To this end, ACT provides trainings to law-enforcement officials and others in the allied criminal justice community (police, prosecutors, judiciary, and allied professionals).

WI/ACT is fundamentally on track for reaching the projected number of professionals trained, though difficulties in securing police and judges were noted. While exceeding the combined target for years one through five (to date) of 5,135 individuals trained, the number of police and public prosecutors represented within that number is small—only 435, or approximately six percent. For example, in the first half of year five of ACT, 786 individuals out of a target of 1,200 for the entire year have received training on TIP, but only 41 were police.

The difficulties in securing larger numbers of police, prosecutors, and members of the judiciary were both logistical (such as the difficulty of taking time off for trainings) and administrative. Administrative hurdles, in terms of USG-required vetting of all police participants, have been a major challenge to effective and flexible training planning. The trainings of police, prosecutors, and judges were positively reviewed and it must be noted that training security personnel is a relatively new component to USAID programs. The trainings on the new legislation are very recent since the law's enactment was only last year. Longer-term assessment of the trainings

cannot yet be done, though follow-up trainings have already begun for police and public prosecutors, in part to help in this assessment. It is a goal of the program to incorporate these trainings into existing curricula, such as those at police academies, to support sustainability.

Orientations, characterized as distinct from trainings and less in-depth, were provided for judges, Foreign Service, and immigration officials on TIP. Content was noted as superficial in comparison to that of the trainings, but positive results were noted from pre- and post-orientation questionnaires provided to attendees.

The incorporation of human trafficking modules or information into university curricula has also been a goal. To date, a memorandum of understanding (MOU) with Northern University of Bangladesh has been put in place to expand its existing course on migration to include key TIP components. A master's course on human trafficking is already in place at the University of Dhaka. Another MOU has enabled ACT to draft guidelines for pre-departure training on TIP by Montage Technical Training Center for persons going abroad to work.

Capacity building for key stakeholders has been a critical part of this component. It built the capacity of both government and civil society actors to develop and implement ongoing responses to the needs of those vulnerable to TIP through the related fields of criminal prosecution and survivor services and support. Examples of the types of capacity-development activities undertaken by the project include the development of training modules and materials on the prevention-, protection-, and prosecution-related issues of unsafe migration; laws related to TIP; and Plan of Action on TIP for community, local government, judiciary, police, prosecutors, media, and civil society.

Participants in these trainings and orientation activities reported that trainings that brought participants together from all parts of Bangladesh and various other localities provided good opportunities for network- and coalition-building, sharing of skills and experience, and working with new ideas and people. Further, national government organizations such as the police and the Ministry for Expatriate Welfare and Overseas Employment felt that the training of some of their national and regional staff and counterparts created opportunities for peer mentoring and internal capacity building into the future. Participants of orientation sessions opined that more in-depth issue-based discussion with references was needed to broaden their knowledge and skill.

Protection initiatives

The final pillar of the ACT SOW is to enhance and standardize the protection and care of victims of trafficking and labor migration abuses. Survivor services sub-grants were awarded to four organizations, with a new sub-grantee joining that number in May 2013. ACT has achieved important results in this area during the project period to date, having provided assistance to more than 1,850 survivors since the program's inception. Years one through four set a target of assisting 1,700 survivors and in fact assisted 1,614. In year five, a target of 500 survivors has been set and 252 have been helped as of the semiannual report, so ACT is on track to accomplish its goal. ACT grantee activities adequately relate to the provision of required services to survivors and these sub-grantees are now working with other component groups,

such as prevention, to provide a more holistic approach to survivor care. The recent focus on the issue of reintegration of survivors is notable. The shelters are comprised of both true shelters and transit centers.

ACT sub-grantees are given training in shelter service standards, but the ability of the survivor centers to provide all services required under such standards varies from location to location. Some have entered into MOUs with other organizations/NGOs to provide the full array of services. ACT is also creating survivor care standards guidelines, but they will not be finalized until 2014.

Shelter staff members were trained on both performance (case management and exit strategy) and process (monitoring issues), with a view to sustainability and improved service delivery. Job training and internships/placement, sometimes facilitated through public-private partnerships (PPP), are given technical support by ACT.

Reintegration of survivors is a high priority, with well over 1,000 survivors recorded as reintegrated into their families and/or communities. Many respondents stated that women face more obstacles to reintegration than men, regardless of the type of TIP they were subjected to, as it is assumed that all female survivors must have been sexually exploited. The number of survivors successfully reintegrated on a long-term basis has been questioned by some respondents as reflecting only the initial return but not the extended reintegration.

ANIRBAN (Survivors' Voice) activities under this component have only been initiated within the last year of the program. The aim of these activities is to create an advocacy group of survivors who can begin to realize behavioral change regarding stigma and reintegration, as well as providing public awareness and legal rights advocacy. The group needs more branding and written guidelines for group formation, and roles and responsibilities within the group should be clarified. WI staff is in the process of developing a protocol to meet these needs.

Legal reform and policy dialogue

This is a relatively new component/objective that was added in 2010, after the initial SOW was drafted and the program had begun. It was included when the opportunity arose to participate in both the drafting of new legislation and a National Plan of Action (NPA) to accompany the law. These opportunities were seized upon and the additional task of being part of legal reform and policy dialogue was incorporated. The law was drafted with technical support from WI/ACT and others in 2011 and enacted in early 2012.

Having successfully participated in the drafting of the NPA, ACT is now a member of the GoB-NGO coordination committee, which coordinates governmental and NGO initiatives. ACT has been recognized by numerous respondents as a lead partner in the NPA implementation and as a key provider of technical support in its drafting. It was noted, however, that many key players in the NPA were entirely ignorant concerning the content of the NPA or even that their organization/agency was included in its mandate. This may be due to the fact that under previous NPAs no definitive allotment of responsibilities was present.

Respondents such as GOB Ministry officials, academics, and NGO officials cited ACT as a critical force in creating the new trafficking law. One respondent even noted that ACT's advocacy for such a law was critical to its creation. ACT provided input for drafting rules to accompany the new human trafficking legislation. The Ministry of Home Affairs (MOHA) has finalized the draft and sent it to the Ministry of Law for formal vetting and further review.

ACT's focus on human trafficking issues is not exclusive and encompasses labor-migration issues. Some respondents voiced concern that by exceeding the TIP issues in labor and extending their mandate to migration generally, they were spreading their resources too thin and should have concentrated solely on TIP.

It was stated repeatedly that many key players do not have the critical knowledge of the new law's content or their responsibilities under the new law. It was also stated that the potential for repetition/overlap of services (such as training of law enforcement on the new legislation) was high, though no actual duplication was reported firsthand. It must be noted, however, that ACT has actively sought out other organizations for consultation to avoid just such duplication. The trainings that have been given through this component received good reviews.

Finally, trainings for police, prosecutors, and others in the criminal justice fields make up a relatively new area for USAID, and their inclusion in a truly comprehensive approach to counter-trafficking is notable. The logistics of such trainings have been noted as difficult, with bureaucratic hurdles consuming a disproportionate amount of time and imposing restrictions on the flexibility of participants.

ACT is currently attempting to support the Ministry of Expatriate Welfare and Overseas Employment (MOEWOE) Monitoring and Enforcement Wing's request for technical support, and has drafted the terms of reference (TOR) for presentation to the MOEWOE. ACT is also an active member of the interagency Vigilance Task Force (VTF). WI and some of its implementing partners reviewed the MOEWOE draft Emigration Bill to provide recommendations. The Bill was sent to the Ministry of Law for further review.

Advocacy projects are run directly by WI and through a small number of its sub-grantees. Advocacy grants are primarily run by Rights Jessore, though there are plans to expand this to encompass other sub-grantees who work directly with survivors such as SHISUK. The Evaluation Team visited Rights Jessore and found its advocacy efforts were very positively reviewed.

The advocacy for legal reform (e.g., new legislation) has been largely successful thus far, as evidenced by the recent enactment of a comprehensive trafficking law and the accompanying NPA and ACT giving support in the drafting of an Emigration Bill.

ACT has published one piece of research that relates directly to this project: "The role of recruiting agencies in the recruitment process to ensure safe migration in order to prevent human trafficking" (May 2012). An earlier piece on internal trafficking of adults was abandoned after three years in favor of this research piece when it was discovered that another organization was planning similar research.

A revised request for proposals will be issued to conduct a study on the patterns and prevalence of TIP in Bangladesh, with the contract awarded shortly thereafter. Whether this will be a comprehensive report or a rapid assessment is unknown at this time.

Results

The enactment of a comprehensive anti-trafficking law and the accompanying National Plan of Action is impressive. However, with all new legislation and its implementation, there will be challenges getting the content information disseminated and communicating the importance and responsibilities under the new law and the NPA. There will also be issues in recognizing potential problems that the new law will face at a practical level and addressing real challenges that arise as it begins to be utilized.

The trainings for police, prosecutors, and others in the legal professions were relatively few; between 2009 and early 2013, a total of 269 police (only one of whom was a woman) and 166 public prosecutors received training. It's important to recognize the administrative difficulties encountered, particularly in setting up police trainings. These trainings received predominantly positive feedback, but the Team was concerned about the potential for duplication of services and materials.

The provision of public awareness has recorded extremely high numbers of those in receipt of such information; some feedback from recipients on these programs leads to positive conclusions about the lasting nature of the information disseminated. However, many direct beneficiaries remain confused about (or at least unable to explain) the exact nature of TIP and are unable to distinguish it from labor migration, particularly unsafe labor migration.

Survivor services, while reaching more than 1,850 survivors and in line with projected results for the time frame, were lacking in a comprehensive guideline for minimum standards for much of the project period. A process to develop such guidelines has been underway for quite some time and should be completed by 2014. Survivor services were guided by existing assessment tools, codes of conduct, and shelter home exit strategy guidelines. The services rendered do touch on a great many practical services that survivors can use, and provide for longer-term solutions to address the risk of continued vulnerability and re-trafficking. At present, while "one-stop" centers may not be available everywhere, there are provisions for referrals where necessary. The recent emphasis on reintegration of the survivor is critical and noteworthy. Reintegration is a process, not an event, and its long-term success or failure must continue to be tracked.

Client satisfaction

Stakeholders and direct beneficiaries expressed overall satisfaction with ACT, though many of the clients of survivor services involved in FGDs were reticent to give their opinions. Some, however, did offer ideas for improving services, (e.g., the presence of a doctor, not simply a medic, on call at all times). Direct beneficiaries of trainings and orientations voiced

predominantly complimentary reviews in their pre- and post-training questionnaires and when asked directly for feedback on the applicability of the training to their work.

Ministries and government officials interviewed were uniformly positive about ACT's performance and services, though other NGOs/IOs have expressed concern that some of ACT's programs (e.g., trainings of police) duplicate existing programs. Those who voiced these concerns felt that resources might be better allocated directly to existing organizations.

Civil society members were also positive about their experiences and interactions with ACT, as were the journalists trained by ACT.

No unintended negative or positive consequences for stakeholders/beneficiaries were identified.

Sustainability

The Project was designed with the institutionalization of capacities and outcomes as a key strategy towards sustainability. All ACT program work is undertaken within existing structures and mechanisms, and there is a definite focus on strengthening the institutional capacities of both government and non-government partners and embedding activities within existing organizations. This includes support for the mobilization of existing counterpart budgets and resources at the activity level and ensuring that future budgetary planning allows for the continuation of such activities.

The creation of collaborative working relationships and joint planning is a key issue for ensuring sustainability through shared analysis and articulation of impact, as well as influencing the creation of learning and change-orientated environments. ACT team members have established functional working relationships with stakeholders at all levels; these relationships are clearly based on mutual trust, shared values, and purpose. This is exemplified by a collaborative approach that seeks to build effective working relationships and undertake joint analysis and problem solving in order to influence sustainable change in policy, practice, and service delivery.

One key example of sustainability is the work that ACT does in providing technical support for the review and drafting of national policies and frameworks. Additional efforts include knowledge transference, ongoing mentoring, and joint monitoring and evaluation activities, all of which are key strategies for strengthening the capacity of partners to deliver improved services to trafficking survivors and their families. Another example is ACT's cooperation with the police, prosecutors, and the judiciary, with whom ACT has jointly developed training modules and curricula that address trafficking and migrant worker issues. The project has also delivered a range of train-the-trainer (TOT) programs with staff from other government departments and resource organizations on issues related to TIP, with the goal of supporting these organizations in integrating them into their ongoing work.

Sustainability initiatives are also found in sub-grantees such as DAM and YPSA, providing training resources for their enrolled survivors specifically on life skills, vocational training, and other entrepreneurial skills in conjunction with local training and resource organizations. It is hoped that by receiving such assistance, survivors can sustain themselves after reintegration and

remove themselves permanently from the population at risk of being trafficked.

PROCESS FINDINGS

Relevance

ACT program constituents are divided into the three classic pillars of counter-trafficking work: *prevention*, *prosecution*, and *protection* of survivors (the 3 Ps). ACT's relevance remains strong within this paradigm; however, since this program's inception the 3 Ps have been extended to encompass additional areas, namely partnership and policy. Fortunately, both of these pillars have been incorporated since the inception of the SOW.

Prevention activities mainly focus on working with local NGOs on public-awareness initiatives in both rural and semiurban areas. Protection activities center mainly on services for survivors using a survivor-centered approach. Prosecution activities were designed with training activities for key government officials and law-enforcement agents and to address coordinated advocacy among activists and with media. Prosecution efforts also focus on expanding government oversight, improving actions, and building capacity of government for effective monitoring of labor recruitment and prosecuting criminal activity and its civil counterpart for things such as damages for victims. The project also gave emphasis to collaboration and coordination with various anti-trafficking and migrant rights organizations.

The relevance of this program continues throughout its lifespan thus far and expands where opportunity presents itself, such as the work done on both the Deterrence and Suppression of Human Trafficking Ordinance (2012) and the National Plan of Action 2012–2014. This work represents the inclusion of the policy pillar noted above. The partnership pillar is also represented strongly; most respondents noted a very positive working relationship with ACT, particularly under the two most recent Chiefs of Party. ACT has been roundly complimented in its recent attempts to build bridges and avoid duplication of effort, even if it was not always successful.

ACT fits very closely with the identified global, regional, and local priorities of United Nations–identified instruments through a range of conventions and policies, such as the Convention on the Elimination of all forms of Discrimination Against Women and the UN Convention on the Rights of the Child. It operates within the USAID Policy on Counter Trafficking in Person, the United Nations Development Assistance Framework (UNDAF) for Bangladesh, and Bangladesh's Sixth Five-Year Plan 2011–2015. The goal and purpose of this project supports the TIP and Migrant Smuggling Program element of the Foreign Assistance Framework.

The Project was designed in line with key government priorities and changes to the administrative and governing structures for the management of migrant workers, many of whom may fall prey to TIP. It seeks to support policy and legislative review, as well as strengthen and institutionalize capacities for improved migration management and service delivery to migrant laborers and trafficked victims.

Management and administration

The stakeholders were generally pleased with management's effectiveness and flexibility in obtaining program results. A key example of flexibility occurred when the opportunity arose to take on a critical role in the drafting of the new TIP legislation and the accompanying National Plan of Action. ACT management structure allowed the initial cooperative agreement modifications to make that possible, as well as subsequent modifications to allow greater hands-on input into any future drafting of such instruments. In so doing, the results of the program were notably enhanced and will leave a greater legacy than might have originally been envisioned.

In the initial stages of the ACT program, some respondents had negative experiences with management not being responsive to their suggestions or input. However, this changed with the second COP and the current COP has received positive reviews. It must be noted, however, that the turnover in WI/ACT key personnel was seen as a difficulty for many, particularly in terms of continuity of program vision and effectiveness.

The capacity-building assessment of ACT carried out by its implementing partners has revealed that it has been a critical part of this component, seeking to build the capacity of both government and civil society actors to develop and implement ongoing responses to the needs of those vulnerable to TIP. This includes support for raising awareness and building service providers' capacity to deliver strategic activities for prevention, protection, and prosecution and post-rescue services and integration activities. The capacity-building activities also include technical support in drafting relevant legislation, the National Plan of Action, TIP issues-based orientation and training, roundtable dialogue, workshops, seminars, networking meetings, and coordination. The scope of activities undertaken under various project components (prevention, prosecution, protection, and legal reform/policy) is extensive and overlaps between components as a result of the project's capacity-building approach to programming.

Table I reflects the number and nature of capacity-building training and orientation sessions organized by ACT/WI:

Table I: Number and Nature of Capacity-Building Training and Orientation Sessions Organized by ACT/WI

Nature of Training	Number of Participants			Remarks
	Female	Male	Total	
Two days training for police, PPs, lawyers and NGO workers	91	459	550	23 trainings organized
One day sharing with judges	18	68	86	2 trainings organized
Three days training for BMET, DEMO, and TTCs for officials	38	150	188	9 trainings organized
Investigative Journalist Training	32	169	201	8 trainings organized
One day Journalist Training	04	19	23	1 training
Refreshers training for BME, DEMO, and Technical Training Centres	16	112	128	6 trainings
One day community orientation	84	282	366	12 orientations
Orientation with partners	41	72	113	8 orientations
Sessions with pre-decision and pre-departure migrants	451	1052	1503	45 orientations
Sessions with law students	209	348	557	16 sessions were organized
Workshop with immigration officials	01	47	48	3 workshops were organized
Session with Labor Attaché	02	03	05	1 session
Orientation with Oasis	07	07	14	1 orientation
Refreshers with police officials	0	41	41	3 sessions
Refresher for public prosecutors	07	14	21	1 refresher
Seminar	15	244	259	Two events
Three days Peer Leaders training	18	64	82	3 trainings
Two days Peer Leaders congress	10	38	48	1 congress
TOTAL	1044	3189	4233	

Capacity building also includes proposed delivery of a range of train-the-trainer (TOT) and step-down trainings for local government service providers, unions, and other civil society organizations that have a role in providing support and services to survivors of trafficked cases and unsafe migrant workers and their families. These trainings include Human Rights and Migration Management Systems, including workplace monitoring abroad; Pre-Departure Briefing; Paralegal Training; Institutional Strengthening; and Organizing Migrant Workers Training. Participants in these activities felt that orientation and trainings were of a good standard and were very relevant to field realities and capacity-development needs.

PERFORMANCE MEASUREMENT

Tracking, monitoring, and reporting system

WI receives quarterly reports from sub-grantees. For monitoring of project activities and progress, a set of checklists and monthly action plan were used by the sub-grantee partners. Report content is also verified by the WI (as technical implementing partner), which significantly contributed to ensuring effective monitoring. Mid-level ACT staff goes through the reports and makes queries and comments, then cross-checks it with implementing partners' monthly action plan. Based on the reporting information, WI updates and cross-checks the database of survivors' information. WI also cross-checks survivors' prosecution data with police headquarters in Dhaka. The Chief of Party (COP) also comments on quarterly reports.

Survivors Service staff review survivor service reports and Public Awareness staff tracks committee work, integration of survivors, peer group leaders, and journalists during field monitoring visits. The Public Awareness component also assesses any impact of new information and follows up on published TIP news. ACT staff's field monitoring visits emphasize current achievements from the previous report. Field monitoring visits also follow lessons learned and recommendations made on each quarterly report.

WI gives semiannual and annual reports to USAID. After getting the report, USAID makes comments on particular issues (such as gender, integration, and cooperation) to the COP of WI. USAID also carries out data-quality assessments on performance indicators in these reports. The PMP establishes the targets and the semiannual and annual reports note the numbers actualized, but without cross-reference to existing targets.

Since the last reporting period, USAID has asked WI to prepare quarterly rather than semiannual reports, which will be results-based rather than activity-based. The Team does not envision this presenting any new challenges as WI's implementing partners are already submitting quarterly reports. This change has been viewed positively at this point and it may increase overall monitoring capacity. Respondents reported that frequently, follow-up and monitoring systems contributed to the betterment of project implementation and performance in attaining desired project results.

Use of reporting information in other systems

These results are fed into the GOB TIP monitoring system in two principal ways: information provided being incorporated into the Police Database at the TIP Monitoring Cell and through inclusion in the annual GOB Bangladesh Country Report on Combating Human Trafficking.

While the police database is an excellent first step in amassing hard data on the prevalence of cases and number of survivors, the gaping hole in this scenario is in the exclusion of those survivors who are not part of any criminal investigation. While the numbers of survivors currently involved in cases of criminal prosecution of traffickers is reflected, those survivors who are not involved in the criminal justice process are missing in these statistics.

Since 2005, the GOB has produced an annual Bangladesh Country Report on Combating Human Trafficking, produced under the auspices of the Ministry of Home Affairs. The data amassed on the ACT program under the tracking, monitoring, and reporting of sub-grantees back to WI is incorporated into the GOB report under its *Initiatives of INGOs*. The report also includes case studies on TIP put forward by the ACT program under the *Case studies from INGOs* section. ACT has been included in the report since 2010 and is still present through the most recent report published in 2013.

SYNERGY

USAID

USAID programs that were specifically looked at for potential synergy with ACT or future TIP programs were Population, Health, Nutrition and Education (PHNE); Economic Growth; Food Disaster and Humanitarian Assistance; and other projects within Democracy and Governance.

There are a host of opportunities to incorporate and cross-pollinate within the field of health, particularly recognizing that the medical community is a critical part of an allied response to survivor needs. In this regard, the Smiling Sun program has been included in the ACT service provision in particular locations but not throughout the entire survivor services program. USAID project personnel interviewed in this evaluation did not know if any specific TIP training was provided to the medical community during the first half of the six-year program, but none has occurred since 2010 when the informant began to work with the ACT program. Since health care professionals could be instrumental in helping to identify (suspected) trafficking victims, their knowledge base is crucial.

Education is another field where possible synergies exist, though none is currently being explored. However, this is an area where there is potential to integrate TIP into an existing project. Currently (December 2012 – March 2016), USAID is collaborating with UNICEF on a project entitled “Delay of Early Marriage.” Noted issues within the existing project specifically focus on the risk of child labor and sexual exploitation within early marriage situations. This is a project that could easily be incorporated into the ACT project. Educators are vital links in targeting at-risk individuals and can be incorporated into survivor services through formal or informal educational opportunities.

The Economic Growth Program is subdivided into two areas: Environmental and Agriculture. Within the Environmental area, there was some very limited future possibility of looking for overlap between their anti-trafficking in wildlife trafficking and in human beings. The theory is that the two activities may on occasion be perpetrated by the same organized criminal groups or have some logistical overlap in terms of routes used. It was also noted that many of the areas targeted for climate change considerations were also areas of high potential incidence of TIP.

Within Agriculture, there is a livelihoods component that works with providing seed money or training on income-generating activities, such as vegetable gardens or other similar projects. Any trafficking survivors who are located within the geographic areas currently served by this project could be easily slotted into these projects.

While Food Disaster and Humanitarian Assistance do not currently have any projects that incorporate TIP, there is potential for future programs because where there is a food disaster or humanitarian assistance is needed, the risk of TIP increases. Finally, within Democracy and Governance, there were other projects such as Justice for All that might have potential for incorporating TIP concepts into their program.

Others

ACT has been lauded by respondents for its efforts to work with other organizations/ministries involved in the field of TIP. Some organizations did, however, voice concerns that many ACT efforts lacked coordination by dividing their services into prevention, prosecution, and protection, and duplicated other efforts already in place. Commitment from policymakers to use ACT for either technical support or more direct assistance has been strong and further agreements are currently being explored (e.g., MOSW, MOEWOE). The positive relationship that ACT has with the Department of State should also be noted, as well as its contribution of information compiled for use in the annual U.S. TIP Report for Bangladesh.

CROSS-CUTTING ISSUES—GENDER AND DISABILITY

Gender

Gender issues were targeted heavily in this program. One example of their integration can be seen through the expansion of the legal definition of TIP to include men and women, as well as recognizing the continuing vulnerability of women and children to all types of TIP (sex and labor). The attempt to eradicate gender bias in the new law was largely successful, although not entirely (see *Trial-in-camera* remarks about only women and children as vulnerable), and the attempt to eradicate it in the Emigration Bill is also noted. It is a unique feature of this project that a good deal of its gender sensitization has been expended upon expanding the understanding of trafficking to include male and female survivors for both labor and sex.

The public-awareness campaigns reflect this expanded gender type, and the survivor services are targeting issues of stigma for women despite their return from sex or labor TIP/exploitation. The numbers of male versus female survivors who are identified, the types of services they are provided, and the reintegration numbers reflect gender disaggregation. It

would appear that the male-to-female ratio varies drastically by organization/implementing partner, with DAM working primarily with women survivors (e.g., 70 out of 84 survivors in year three of the program, 110 out of 156 in year four, and 83 out of 114 in year five to date) and SHISHUK and YPSA working primarily with men (e.g., combined organizations servicing 144 men and 54 women in year three; 227 men and 29 women in year four; and 94 men and only 11 women in year five to date). The overall ratio of male-to-female survivors serviced, however, is evening out overall, with all three organizations currently servicing five men to every four women. While this may reflect the emphasis placed on inclusion of male survivors in this program, it is good to ensure that male/female percentages are roughly reflective of the overall demographic of trafficking survivors.

The project has significantly integrated gender issues into different trainings, orientations, and modules that include components on women's and children's rights; the difficulties of early marriage; trafficking in women and children, specifically; the importance of girls' education; women's access to resources, etc. During the interview session, many women reported on changing attitudes, practices, and behaviors of their male partners in dealing with family and social issues, which was identified as a reflection of community-based awareness programs. The result also reflected on increasing women's participation in decision-making in their households and increasing mobility outside the home, as reported from KIs. Gender sensitization was identified as being responsible for community members, particularly men, who now encourage girls' education to protect them from early marriage. The limitation of women's participation in the CBO (community-based civil society organization) leadership, however, must be noted, where its leadership remains predominantly male.

Disability

The inclusion of disability issues is more problematic. Many sub-grantees and other interviewees stated there were no disability components in their particular program but would deal with its presence on a case-by-case basis or through referral to organizations better equipped to deal with disabled persons. Without a proper understanding of disability and the role it plays in targeting, exploitation, and services required after rescue, including reintegration and long-term strategy for reducing the risk of re-victimization, this most vulnerable community will not be properly served.

ACT Project has no separate policy, strategy, or guidelines to deal with disabled survivor cases. During the evaluation field visits, it was observed that two hearing/speech-disabled cases are currently enrolled in the survivor centers. Other than shelter and food, they are not receiving any services from the shelter home. Management of the shelter is considering referring them to the government-run Juvenile Center in Dhaka.

VII. CONCLUSIONS

PREVENTION

As with many public-awareness activities, it is easy to record large numbers of those reached but difficult to gauge the depth of knowledge gained and the longevity of the information stored within the targeted audience. The public-awareness campaign is distributed sporadically throughout the country and the sites chosen were specifically targeted as being high in potential TIP activity and previously underserved. The sub-grantees are conducting numerous awareness activities, but the basic messages of what TIP is (definitional clarity) does not appear to be taking root among many of those targeted. Without this definitional clarity, it is difficult to construct other programs that use this as a building block for future prevention activities. The goal of the public-awareness component is to move toward behavioral changes in communities and individuals to reduce vulnerability to TIP. However, without a solid understanding of TIP and how it differs from both safe and unsafe migration, this cannot happen. WI's technical assistance and coordination between sub-grantees from all program pillars is laudable, but this coordination should have occurred from the beginning of the program and not be such a recent event.

The journalist-training component has resulted in a good number of journalists trained on critical human-trafficking issues but the depth of their understanding is uncertain. When reporting on TIP, the journalists did not refer to either the new legislative definition or to the Palermo Protocol's definition. Definitions given were specific to the facts of the article and may result in readers having an inadequate understanding of the breadth of TIP. The number of resulting articles published may be deemed small, but as editorial decisions are beyond the control of the journalists and ACT, this must be taken into consideration. Monitoring of TIP articles is occurring, but those doing the monitoring are not aware of its purpose.

Finally, over the course of the program the media campaign has encompassed the dissemination of TV, radio, and IEC materials. The recent shift in focus to community radio is understandable and appropriate, both in terms of target audience reach and effective message delivery. These radio programs are also subject to prompt direct feedback from listeners, sometimes through social media such as Facebook, SMS, or media group discussions, which may allow for immediate/rapid adjustments to future programs to increase effectiveness.

Reprint of IEC materials is planned for the immediate future and all such materials are being reprinted in the local language(s) or are bilingual (English and Bangla) to allow for optimal understanding by the targeted audience, and as called for in the 2011 WI midterm report.

PROSECUTION

ACT interventions are contributing to the increased capacity of government officials, including law enforcement, to gain knowledge of the new TIP legislation and their new responsibilities and procedures required under the law. Participation in these trainings, however, is hindered by administrative problems resulting from bureaucratic requirements and participants having

difficulty in leaving their employment for the trainings (e.g., judges). Incorporation of these TIP training modules (or module content) into existing police academy trainings and university curricula will have a positive impact on sustainability. Volunteer development through peer leaders or youth training has assisted in sustainability and capacity building. Trainings provided for CBO and NGO staff also support capacity building, although vulnerability to turnover may negatively affect this over the long term.

PROTECTION

ACT interventions are contributing to the increased capacity of the selected implementing partners and the resulting comprehensive services afforded to survivors. Recent cross-referencing of survivor shelters and prevention initiatives is praiseworthy, but the failure to create a comprehensive guideline for survivor services until the end of the project is puzzling. The addition of a new sub-grantee this close to the end of the project is also questionable, particularly in light of the midterm evaluation's finding that short-term (here, approximately one year) relationships were not best suited for performance or sustainability.

The basic tenets of survivor services address rescue, rehabilitation, and reintegration. The expansion of jobs and vocational/educational options to survivors is positive, as is reaching out for public/private partnerships. The recent focus on more in-depth reintegration focus is sorely needed, as successful reintegration is not simple to assess. The issue of gender and successful reintegration being highlighted is also positive.

LEGAL REFORM/POLICY DIALOGUE

The contribution to a new piece of legislation and its rules and the National Plan of Action is quite impressive. The administrative hurdles that had to be overcome in terms of changing the cooperative agreement to allow ACT to fully engage in these (and future) endeavors reflect a flexibility within management to optimize new opportunities as they present themselves. The task now is to spread knowledge about both the new legislation and the relevant NPA. Reviewing the newest piece of potential legislation, the Emigration Bill, also offers an opportunity to underscore the differences and relationship between TIP and migration generally.

Research on internal adult trafficking that was originally planned would have been very helpful in dispelling the image of trafficking as an exclusively cross-border phenomenon. While the resulting piece on recruiting agencies (*Role of Recruiting Agencies in the Recruitment Process to Ensure Safe Migration in order to Prevent Human Trafficking, May 2012*) has direct applicability to the program, losing the opportunity to produce two pieces of research over a six-year period is unfortunate. The initial research was abandoned due to another organization's conducting similar research, but this possibility should have been investigated prior to the start of research. Producing one piece of research in a five-year period is underwhelming. The final piece of proposed research on TIP prevalence must be made a priority. Whether the revised request for proposal (RFP) is for an in-depth, nationally representative, qualitative assessment or for a "rapid response assessment" should be seriously considered. While either would add to the

knowledge base of TIP in Bangladesh, the monetary commitment needed and the time required would vary distinctly for each type of project.

RESULTS

Overall, the program is on track to meet its agenda in terms of prevention, prosecution, protection, and legal reform initiatives. Some focus and continuity difficulties arose as key members of the project left and were replaced. Some opportunities were missed, such as a higher quantity of research coming out of the program and synergy opportunities being maximized within USAID programs. However, other opportunities were seized upon and maximized, resulting in a new component to the program, legal reform/policy dialogue. The part ACT played in the creation of the comprehensive TIP legislation and the National Plan of Action 2012–2014, as well as their implementation, may well serve as the most visible legacy of this project.

The Team notes the following particular strengths and weaknesses of the program:

Strengths

- The staff members of the sub-grantees were involved with the planning process of their respective project part from the initial stage, which helped to create ownership by the staff members of the sub-grantee organizations;
- Interest generated within the local communities, particularly women, adolescent groups, and school-going children, motivated them to act as change agents in prevention of trafficking;
- All the community volunteers and master trainers are selected from the local community to make sure that the community feels a sense of ownership for steering anti-trafficking actions in the community;
- Strong commitment of the project staff of the sub-grantees to the project interventions.

Weaknesses

- Other than senior staff members, many field-level staff members do not have enough competence in dealing with law-enforcement agencies and local government representatives for strengthening their role and commitment in anti-trafficking initiatives;
- The field staff members do not always consider research activities as an integrated part of their responsibilities; most of their concentration goes into direct implementation of project interventions;
- Turnover of skilled staff members in some cases created conceptual problems in the continuation of ongoing field activities that required orientation for the new staff members to adopt them into the Team;
- There are still some limitations among some staff members of the implementing partners in the facilitation of community-based sessions, organizing events, conceptual understanding on rights and anti-trafficking laws, prioritization of assigned works, and application of learning in meeting project expectations.

CLIENT SATISFACTION

Direct beneficiaries, whether of survivor services, trainings, or prevention-awareness campaigns, were on the whole very satisfied with services they received from ACT. There were individual cases of direct beneficiaries and services clients who were not satisfied, e.g., survivors who felt the services did not adequately address their needs and concerns, but overwhelmingly the feedback was positive.

Other stakeholders were also predominantly positive, though there were some who voiced concerns about duplicative services. The program has fundamentally satisfied its clients; however, as is always the case, there are some who were not satisfied.

SUSTAINABILITY

ACT team members have established functional working relationships with stakeholders at all levels, which are clearly based upon mutual trust, shared values, and purpose. This will ultimately enable the ACT project to have significant impact at the technical and influencing level, particularly in line with the urgent government priority to review and strengthen the regulatory framework for labor migration.

Certain activities may eventually be able to continue without ACT funding and facilitation. However, capacity-building interventions are vulnerable to turnover in personnel, and certain activities such as rescue will never generate income or self-sufficiency. Some sub-grantees are themselves aiming for either complete sustainability, such as SHISUK, or substantial sustainability, such as Smiling Sun Franchise.

With successful impacts on mobilizing volunteers as well as incorporating training modules into existing police/prosecution/judicial professional training materials, public awareness and advocacy efforts initiated by ACT could continue. Additionally, through inclusion in university courses and programs, information on TIP will continue to be disseminated, as well as potentially researched, after the conclusion of the program. A newly adopted activity within the public-awareness component is the orientation session with high school and university-level students. This knowledge among students could be sustainable, but the depth and clarity of knowledge would need to be assessed.

RELEVANCE

Interventions and activities that were targeted and implemented under ACT are absolutely relevant to the needs of the communities, institutions, and the GOB. It proved relevant as well in the discourse of TIP priority reflected in the literatures, national law, and National Action Plan. The central theme of the projects “Strengthening Local Capacity for TIP” and “Actions for Combating Trafficking in Persons” again reconfirms the relevance of these projects’ interventions and activities.

The project activities that it approaches and the strategies that ACT employs are clearly aligned with the expected outcomes and result to be achieved at the local and national level. Another

important aspect of the project—to facilitate implementation of the GOB laws, policies, and action plan related to TIP—continues to be critical to the next set of hurdles after legislation: implementation of the law as well as the rules and regulations that accompany it. Having a clear, common, easily communicated understanding of trafficking risks and consequences accepted by all stakeholders enhances project relevance as a conceptual framework guides all partners to have a shared meaning of TIP.

While the original SOW did not envision the legal reform/policy dialogue component to the program, its subsequent incorporation in particular was key in advancing and increasing the project's relevance to the immediate environment of legislative change and accompanying reforms in related areas such as emigration legislation.

MANAGEMENT AND ADMINISTRATION

The management and administration's effectiveness and flexibility were found to be well reviewed by the respondents. Management and administration were found to be supportive and enabling in achieving the program's goals and objectives. While some capacity-building components such as knowledge transference of the definition of trafficking and its differentiation from other related concepts have not achieved unqualified success, the capacity building of ACT partners has been an overall success thus far.

A key indicator of the effectiveness of the project capacity-building approach is the high level of acceptance and support of its attempts at institutionalizing learning and capacity within its stakeholders and partner organizations. All partners noted that they felt that their staff had gained new skills and knowledge that they were able to transfer to the workplace and that in return enabled them to enhance the breadth, scope, and quality of service delivery.

PERFORMANCE MEASUREMENT

The performance measurement system is currently undergoing changes that are so recent as to be outside the scope of this evaluation's ability to assess them. However, an initial assessment would support the new indicators used as appropriate. Whether moving from semiannual, activity-based reports to quarterly reports that are results-oriented would be a good fit for this project will have to be evaluated at the conclusion of the program. That said, the Team does not envision this change presenting any particular difficulties for WI. The reporting from sub-grantees to WI is monthly and is guided by tools such as checklists, which were reported as helpful. The monthly reports were not found to be too burdensome and often resulted in program change based on information contained in the report.

The use of the information on the number of survivors amassed through this monitoring system in the police database is helpful, but many of the survivors are left out if they are not currently part of a criminal prosecution.

The use of information in the annual GOB TIP report is extremely productive as it both shares information on the ACT program's accomplishments (and challenges) and raises the profile of the project through inclusion in this key document.

While an extensive analysis of the performance tracking and monitoring system will be helpful for the final evaluation, at this point the results-based framework has, unfortunately, just been implemented (March 2013). As such, it is too early to be able to tell what, if any, improvements need to be made to the new framework or if any gaps will be identified. This would be best dealt with in the final evaluation where the framework will be in place for six report cycles at that point (as the reporting period has also moved to a quarterly time frame).

SYNERGY

While there is currently a small amount of synergy within USAID, there is room for far more. Currently, programs in Population, Health, Nutrition, and Education have the greatest substantive overlap with TIP. Future education programs might incorporate prevention/awareness-raising of TIP, and then utilize the teachers' and students' increased knowledge as a potential source of identification of (suspected) TIP. Medical trainings that are offered to healthcare professionals could include a small module on the specific issues for which TIP survivors may be at risk. In Economic Growth, jobs/skills training could incorporate TIP survivors who are located in the existing program locations. Humanitarian Assistance programs might also incorporate information on TIP prevention and risks. Finally, Democracy and Governance programs that address justice issues could also integrate a small component on TIP into their agenda.

CROSS-CUTTING ISSUES—GENDER AND DISABILITY

While issues of gender have been successfully integrated into the program at all levels, it must be noted that there is still a residual male domination in the more rural and community-level organizations.

The eradication of gender-specific language in new and emerging legislation is an excellent place to start on a campaign for reeducating people about the full breadth of TIP victimization. The special difficulties women face in certain aspects of survivorship, such as the stigma preventing reintegration into the community, continue to be recognized and dealt with. The balance between expanding concepts to be gender-free and still recognizing gender-specific challenges seems to have been well struck.

Disability, however, did not receive such focus, to the extent that disabled survivors seemed to be entirely left out of plans and provisions for prevention, prosecution, and policy. No special targeting or services were noted in any of the components of the program. The program needs to give disability the same emphasis and resource allocation as it gives to gender issues to truly reach the full coverage of all those affected by TIP.

VIII. RECOMMENDATIONS

The following recommendations are based on information gained from interviewees, documents, and literature reviewed.

REMAINDER OF ACT PROGRAM

Prevention

On the issue of prevention, it must be noted that while the numbers reached by the public-awareness anti-TIP messages are high, clarity and depth of knowledge seemed to be lacking among many of those interviewed. As public awareness is a critical building block, this should be addressed.

Prosecution

Ensure that trainings are not duplicative, but rather complementary to any pre-existing trainings offered, and that "orientations" are eliminated or kept to a minimum.

Protection

Reintegration, especially the challenges faced in this regard by women, is an area that merits focus, and was envisioned as such by ACT's remaining work plan. Completion of the new minimum standards for survivor care should be prioritized for completion.

Legal reform and policy dialogue

Focus remaining time on targeted training on new TIP legislation and its implementation, as well as the National Plan of Action. Additional input into the new Emigration Bill should be placed on a second tier.

Research

Take immediate steps to finalize the proposed Prevalence study.

Partnership/synergy

Expanding the project (e.g. taking on additional sub-grantees) at this juncture may be unwise, as the limited amount of time remaining is not necessarily optimal for best results. Short-term collaboration was specifically noted as problematic under the WI midterm evaluation. Also, explore potential for synergy within USAID's existing programs under other programs (ex: Education's UNICEF project) as there may be opportunities that are both topically relevant and timely.

Cross-cutting issues—disability and gender

Some of the remaining time and resources of this program should be spent focusing on having a protocol in place for responding to the disabled victim/survivor. This would include physical disability as well as the developmentally delayed and the emotionally challenged. All facets of the program could benefit from this, e.g. targeting prevention programs to this at-risk group; understanding what (if any) special provision the legislation makes for helping these individuals through the criminal justice system; and how to craft a particularized recovery program in survivor services. Attempts to fully integrate women into the decision-making process at all levels should be emphasized. The unique issue of this program emphasizing expanding the definition and general understanding of TIP to include men has largely been achieved in terms of service provision and targeting of prevention-awareness programs. However, many persons interviewed still retained the understanding of TIP as a "woman's problem"—not a human rights problem.

IX. LESSONS LEARNED

The Evaluation Team also draws USAID's attention to some lessons learned from the program's implementation that should inform future counter-trafficking efforts.

RELEVANCE

Relevance is a concept that evolves, as evidenced from the late inclusion of legal reform within this project and by the expansion of concepts such as policy and partnership into the pillars of anti-trafficking work. Future programs should make relevance an ongoing theme within the project, not simply assessed or considered at the outset of a program. Contracts/cooperative agreements should be constructed to readily allow for such change in a timely manner to ensure that opportunities are not missed due to bureaucratic matters, though none were missed in this project due to the rapid response provided to allow for new areas to be incorporated into the existing agreement.

Placing trafficking more firmly within the broader context of human rights would simultaneously allow for addressing the causes of trafficking, such as the lack of women's empowerment in areas such as (child) marriage, dowry, and divorce, which in this country are still mainly guided by males. Doing so would have a dramatic impact on the rights of women, which would contribute to lessening the vulnerabilities to trafficking.

RESULTS

Prevention

Assessment of prevention initiatives, particularly public-awareness campaigns, is methodologically difficult, as measuring a negative event is problematic. Assessing reduction in TIP against an unknown or uncertain baseline number of trafficking cases lends additional problems to prevention. Future programs should ensure that any results that attempt to quantify an event or process have the necessary building blocks in place to construct such a conclusion.

Prosecution

Burdensome administrative issues, such as the labor-intensive and time-consuming vetting process for police trainings, and practical logistical issues, such as judges and prosecutors encountering difficulty in taking time away from their jobs to participate in activities, should be considered in the design of projects. If the desired result is to train a critical mass of prosecutors, police, and judges, program design should recognize these difficulties and seek information from the targeted group on how best to accommodate their needs. Administrative obstacles should also be recognized in assessing how many trainings/participants can reasonably be reached within the project's time frame. The numbers of police, prosecutors, and judges targeted for training initiatives should also be disaggregated from other legal professionals (such as paralegals or lawyers) to allow for easier assessment of actualization of meeting the targeted numbers trained within this small but critical cadre of legal professionals.

Protection

Critical components of the 3 Ps should be developed in a logical time sequence. Waiting until the final year of a program to develop guidelines of standardizing of survivor services, which was a key part of this pillar's objective, has wasted the opportunity to field-test the standards and also give their benefits to the survivors served by this project. Prioritization of tasks should be assessed at the outset of program design to ensure that results are reached in a timely and effective manner.

Integration of components

Where all the pillars of trafficking are not present in one location, excellent service delivery in all aspects of the program is lessened. The international aspect of trafficking is of increasing importance. Future programs should be designed with this emerging focus in mind to maximize coordination and minimize duplication of services.

MANAGEMENT AND ADMINISTRATION

Turnover was repeatedly noted as a bar to maximum effectiveness. Incentives to continue with the project for top management and key mid-tier personnel should be established. Time, money, and other resources are wasted when multiple parties have to be brought in to a program in succession for a single position.

CLIENT SATISFACTION

TIP programs work best when local participation and sense of ownership from the grassroots up are in place. Consultation with local communities during the design phase of a program would help ensure this. It would also inform program choices to meet the self-identified needs of the communities it serves.

Trainings should differentiate the needs of each constituency that receives them. Doing a needs assessment of individual professionals' needs, with the professionals themselves leading this assessment, prior to creation of projects or activities, will increase the participants' satisfaction with and utilization of the activity in their subsequent work.

CROSS-CUTTING ISSUES

Ensure that all cross-cutting issues identified receive appropriate importance in program response. While gender was thoroughly incorporated into ACT, issues of the disabled were not included despite WI's own midterm evaluation calling for just this inclusion.

Gender inclusion at the local community level for program design and management is critical is counterbalancing the continuing effects of gender discrimination.

SYNERGY

Opportunities for synergy arise throughout the course of a program. Routinely (semiannually) seeking information on potential integration of TIP into other USAID programs or projects would ensure maximization of resources and services provided.

ANNEX I: EVALUATION STATEMENT OF WORK

Scope of Work

**for the Actions for Combating Trafficking-in-Person (ACT) Program
External Midterm Performance Evaluation
USAID/Bangladesh
Office of Democracy and Governance**

Program Identification Data

Program Title : Actions for Combating Trafficking-in-Person (ACT) Program
Program Number : Cooperative Agreement No. 388-A-00-08-00111-00
Program Dates : October 1, 2008 – September 30, 2014
Program Funding : \$5,499,477

Implementing Organization: Winrock International (WI)
Agreement Officer Technical Representative (AOTR): Habiba Akter

I. Background

Bangladesh continues to face the domestic challenge of trafficking-in-persons (TIP) and its related population effects. As the demand for cheap labor and an expanding sex trade continue in developing countries, so does human trafficking. Bangladesh is primarily a source and transit country in regards to TIP with most victims trafficked abroad for commercial sexual exploitation, involuntary domestic servitude, and other forms of forced labor. The situation is exacerbated by the large number of Bangladeshi migrant workers traveling to other countries where they face endemic violations of human rights and often become victims of labor trafficking. In 2010, Bangladesh was ranked as a Tier 2 Watch List country for the second year in a row by the Department of State. The absence of a comprehensive national law against human trafficking and a failure to make significant inroads in addressing labor trafficking prosecution have been identified as the primary reasons for the consistently low ranking.

USAID/Bangladesh is funding a six-year (2008-2014) \$5.4 million initiative entitled “Actions for Combating Trafficking-in-Persons (ACT)”. USAID/Bangladesh’s ACT program is implemented by Winrock International (WI). The specific program objectives are as follows:

1. To reduce the rate of trafficking-in-persons and unsafe labor migration within and from Bangladesh;
2. To enhance and standardize the protection and care of victims of trafficking and labor migration abuses; and
3. To strengthen the GOB’s capacity to prosecute traffickers and trafficking-related crimes while improving overall rule of law and human security.

ACT is a national program that connects local and national government representatives, non-governmental organizations, and citizens and community leaders to spearhead an effort to prevent trafficking-in-persons, protect and reverse damages to survivors, prosecute crimes of perpetrators, and engage all layers of society as change agents in curbing human trafficking in Bangladesh.

The ACT Program clusters anti-trafficking efforts under three categories: Prevention, Protection, and Prosecution. **Prevention** activities focus on working with local non-government groups on public-awareness initiatives in rural and semi-urban areas. ACT strives to expand the role of teachers, students, and community and local leaders as activists and role models for disseminating messages focused on equality and human rights, safe migration and employment practices, and stigmatizing perpetrators instead of victims. ACT outreach and public education efforts also expand the focus of anti-trafficking to include not only sexual exploitation of women and children but also labor migration abuses and victimization of men.

Protection activities feature comprehensive services to assist survivors using a victim-centered approach to:

- identify trafficking victims whether in shelters or in communities;
- individually assess needs and provide an array of services in shelters and integrated into village or city life;
- provide life skills and livelihood vocational programs and help in securing employment or creating a business; and
- create models and opportunities for reintegration in communities or for leading an independent new life without the risk of re-trafficking.

Prosecution activities involve coordinated advocacy work among activists and with media, coupled with specific training for key government officials and law-enforcement agents. Advocacy efforts focus on expanding government oversight, improving arrest and prosecution, and building government capacity to monitor labor recruitment agencies and prosecute malpractices. Working in collaboration with local anti-trafficking and migrant rights organizations, ACT helps to:

- develop and implement an advocacy agenda to improve enforcement of existing laws, policies and practices;
- pursue policy dialogue and legal reform to better address trafficking at the national and local government levels;
- enhance prosecutorial capacity of law-enforcement agents and lawyers; and
- expand the legal framework to encompass the emerging issue of labor migration abuses.

Through the above-mentioned activities under the ACT program, USAID/Bangladesh seeks to combat human trafficking in Bangladesh, enhance the protection of the victims and improve victim care, while strengthening the Government of Bangladesh's (GOB) capacity to prosecute traffickers and trafficking related crimes. In the long term, USAID TIP program will contribute to reducing transnational crime, benefit victims through legal and support services, and

strengthen Bangladesh's ability to enforce relevant national laws and international treaties. Achievements under this initiative will also help create conditions for improved national and regional security.

Half-way through the program, the prospect of an improvement in the legal environment related to TIP emerged. The GOB, through the Ministry of Home Affairs initiated the process to adopt a new comprehensive law against human trafficking (2010). At the time the Cooperative Agreement was awarded, USAID had no knowledge of GOB's plan to draft this law. As a result, the program's scope of work was revised to include assistance to the GOB in the drafting of its law. WI has been acknowledged as a key stakeholder in this process and has been able to more fully engage with the GOB to provide them assistance during the drafting stage. WI's previously planned activities around the implementation of the National Plan of Action (NPA) were delayed due to a shift in the GOB's priorities. At present, as the draft law is in the final stage, the GOB has expressed willingness to commence NPA activities. WI is leading the five member NPA committee that will coordinate these activities.³

II. Objectives of the Evaluation

This external performance evaluation comes at the end of the third year of the ACT program. The objective of this midterm and formative evaluation is to assess the impact and lessons learned thus far from ACT for consideration in the remaining year of the program, as well as in design of a follow-on program, if appropriate. The midterm performance evaluation will:

- Test the technical and programmatic validity of the hypotheses on which the ACT program was designed;
- Assess the efficacy, cost-effectiveness, and impact of the ACT implementation tools and management structure in meeting the objectives thus far;
- Assess the current achievements of the ACT program in light of the findings/recommendations made by the initial WI assessment conducted at the outset of the ACT program;
- Evaluate ACT implementers' performance to date and assess actual results against targeted results and establish whether the program is on course to meet set objectives; and
- Make recommendations to USAID/Bangladesh concerning future programming.

The audience for this midterm performance evaluation is USAID/Bangladesh, the Government of Bangladesh, USAID/ Washington's Office of Democracy and Governance, the Asia Bureau, and the Department of State's G/TIP office.

³ It should be noted that since the drafting of this SOW, the Prevention and Suppression of Human Trafficking Act was passed and the National Plan of Action for Combating Human Trafficking 2012-2014 has been finalized. However, the SOW remains in its original language.

III. Evaluation Questions

This Scope of Work is for a midterm performance evaluation of the ACT program implementation from October 2008 to September 2014. The evaluation should review, analyze, and evaluate the ACT program using the following prioritized questions. The evaluation should make conclusions based on the findings, identify opportunities and make recommendations for improvement. In answering these questions, the Evaluation Team should assess both the performance of USAID and that of the implementing partner(s).

Relevance.

1. To what extent are the project's objectives still relevant to the current development circumstances in Bangladesh and will they provide sufficient guidance for appropriate programmatic and technical assistance decisions?

Results.

2. To what extent has ACT been successful in achieving program objectives?

Management and Administration.

3. How effective and flexible has the ACT management structure (WI and their implementing partners, and USAID) been in obtaining program results, including capacity building of ACT implementing partners by WI?

Client Satisfaction (GOB, beneficiaries, other stakeholders).

4. What are the opinions of direct beneficiaries, elected officials, local and regional government officials, media, civil society, and other stakeholders regarding ACT?
5. Have there been any unintended consequences (negative or positive) for stakeholders/beneficiaries from the implementation of ACT?

Performance Measurement System.

6. Has ACT's M&E system have been effectively used to track, monitor, and report results attributable to ACT activities and what changes are required to make the performance management system more effective?
7. How does the ACT monitoring system feed into GOB monitoring systems regarding trafficking situation?

Cross Cutting Issues.

8. How well has gender been integrated and disability issues been addressed by ACT's interventions in the targeted areas? Are there any alternative approaches identified for greater impact?

Synergy with other USAID and Donor Funded Programs.

9. How effectively has ACT coordinated with other USAID/Bangladesh programs, i.e., DG, Economic Growth, Population Health Nutrition and Education, Food Disaster and Humanitarian Assistance in achieving ACT objectives and contributing to other USAID/Bangladesh objectives?

Sustainability.

10. How much progress is ACT making in establishing sustainability plans beyond USAID support? Are there any obstacles undermine the goal of sustainability and what measures should be taken to enhance sustainability?

IV. Proposed Evaluation Methodology

Efforts to determine the outcomes of the ACT Program will rely on a desk review; selected key informant interviews with stakeholders, including USAID personnel, implementer staff, media personnel, local government officials and CSOs who were involved in the implementation of ACT; and focus group discussions (FGDs).

The study should investigate the impact of ACT activities on the levels and nature of trafficking in Bangladesh. Trafficking figures will be sourced from program and publicly available data. The study review and interviews should, to the extent possible, determine which of ACT's activities were most effective in addressing TIP and why. Bangladesh-based interviews of field staff and stakeholders under this study should be reasonably spread across the country.

The evaluation methodology will be a three-pronged approach:

1. Desktop Review of Key Documents and Initial Analysis

The Evaluation Team shall review relevant USAID documents, as well as key documents from USAID's implementing partners and outside sources.

The Evaluation Team will use this literature to develop an initial response to the questions listed in Section III above, and to set forth hypothesized cause-effect relationships that can be tested through field research and interviews. The Evaluation Team will also use the information from the desk review to design tools for conducting key informant interviews and focus group discussions.

2. Conduct Interviews and Field Research The Evaluation Team will conduct interviews with USAID/Bangladesh staff, program participants, implementing partners, sub-contractors and sub-grantees, relevant GOB representatives, civil society representatives, the media, donors, stakeholders, and other relevant beneficiaries. The Team should create sampling frame to conduct interviews of stakeholders and field visits with 1-2 sub-grantees under each type of

sub-grant. The Evaluation Team's work plan should include an interview list and proposed field visits.

Personnel to be interviewed in Washington will include, but are not limited to the following:

- USAID Bangladesh desk officer;
- USAID TIP point of contact;
- State Department Bangladesh desk officer;
- State Department G/TIP point of contact;
- WI Head Quarters personnel.

3. Conduct Focus Group Discussions

The evaluation should include focus group discussions with a sample of the target beneficiaries and other stakeholders involved in the implementing of the ACT program. To measure clients' satisfaction as well as program effectiveness the Team should conduct focus group discussions and/or opinion polls for media, civil society, elected officials and local and regional government officials in targeted regions.

The Team will build on the proposed methodology and provide more specific details on the evaluation methodology in the Evaluation Work Plan (see Deliverables below). The evaluation will be participatory in its design and implementation and the evaluation methodology will be finalized through further review and discussion between USAID/Bangladesh and the Evaluation Team. The methodology narrative should discuss the merits and limitations of the final evaluation methodology. The Evaluation Team will design appropriate tools for collecting data from various units of analysis. The tools will be shared with USAID during the evaluation and as part of the evaluation report.

The information collected will be analyzed by the Evaluation Team to establish credible answers to the questions and provide major trends and issues. USAID requires that evaluations explore issues of gender; thus, the evaluation should examine gender issues within the context of the evaluation of ACT activities.

V. Existing Sources of Information

USAID/Bangladesh DG Office will provide documents for the desk review and contact information for relevant interviewees. The list is not exhaustive and the Evaluation Team will be responsible for identifying and reviewing additional materials relevant to the evaluation.

Documents for review will include, but are not limited to the following:

- Bangladesh Democracy and Governance Assessment, ARD report, August 2009
- USAID/Bangladesh Strategy, Annual Reports, Operational Plan, Performance Monitoring Plan, DQA report 2010, CDCS relevant sections on Democracy and Governance and Results Framework

- ACT agreement, amendments, sub-grants and sub-contracts, work plans (year 1,2 and 3), semiannual reports, and program performance reports for year 1 and 2
- ACT initial TIP assessment report, 2010
- USAID Counter Trafficking in Persons Policy
- GOB Poverty Reduction Strategy and other relevant GOB documents
- ACT Internal Mid-Term Evaluation Report, 2011
- ACT Labor Trafficking Study, 2011
- ACT Recruiting Agency Study, 2011 (planned to be completed by September 2011)
- ACT annual PMPs (year 1,2 and 3)
- Department of State's Annual Trafficking in Persons Reports (2009, 2010 and 2011)

VI. Deliverables

All deliverables are internal to USAID and the Evaluation Team unless otherwise instructed by USAID.

1. Evaluation Team Planning Meeting (s)– essential in organizing the Team's efforts. During the meeting (s), the Team should review and discuss the SOW in its entirety , clarify Team members' role and responsibilities, work plan, develop data collection methods, review and clarify any logistical and administrative procedures for the assignment and instruments and to prepare for the in-brief with USAID/Bangladesh
2. Evaluation Work Plan. A draft work plan should be included in the proposal. The work plan should include notional lists of meetings, site visits, and interviews, and an evaluation methodology for submission to USAID/Bangladesh. The Evaluation Team will submit an updated evaluation work plan to the USAID/Bangladesh Democracy and Governance Office Director within seven (7) working days of award.
3. Briefings. The Evaluation Team will provide an entrance briefing to the USAID/Bangladesh Democracy and Governance Office and other interested Mission staff at the beginning of the evaluation to present to the Mission the objectives and methodology for the evaluation. A brief midterm status meeting is required. The Evaluation Team will also provide an exit briefing of its findings and recommendations to the USAID/Bangladesh Democracy and Governance Office and other interested Mission staff at the conclusion of the evaluation.
4. Data Collection Instruments–Development and submission of data collection instruments to USAID/Bangladesh during the design phase.
5. Regular Updates - The Evaluation Team Leader (or his/her delegate) will brief the BDGPE COR on progress with the evaluation on at least a weekly basis, in person or by electronic communication. Any delays or complications must be quickly communicated to USAID/Bangladesh as early as possible to allow quick resolution and to minimize any disruptions to the evaluation. Emerging opportunities for the evaluation should also be discussed with USAID/Bangladesh.
6. Debriefing with Partners - The Team will present the major findings from the evaluation to USAID partners (as appropriate and as defined by USAID) through a PowerPoint presentation prior to the Team's departure from the country. The

- debriefing will include a discussion of achievements and activities only, with no recommendations for possible modifications to program approaches, results, or activities. The Team will consider partner comments and incorporate them appropriately in drafting the evaluation report.
7. Draft Evaluation Report. The Evaluation Team will analyze all data collected during the evaluation to prepare a draft evaluation report and submit the report within 10 working days after the departure of expat team members from Bangladesh. The contractor should substantiate all findings and recommendations through citations of information sources. The Evaluation Team will present two hard copies, along with an electronic Microsoft Word version, of the draft written report of its findings and recommendations to the USAID/Bangladesh Democracy and Governance Office Director within ten (10) business days from the last day of the evaluation. The Evaluation Team will in turn revise the draft report into a final report, reflecting USAID's comments and suggestions, within 5 working days of receipt of the written comments
 8. Final Evaluation Report. The Evaluation Team will submit two hard copies of the final report, along with an electronic PDF and Microsoft Word version, within 7 working days following the receipt of comments from USAID.

The final report should meet the following criteria to ensure the quality of the report:

- The evaluation report should represent a thoughtful, well-researched and well-organized effort to objectively evaluate what worked in the project, what did not and why.
- Evaluation reports shall address all evaluation questions included in the scope of work.
- The evaluation report should include the scope of work as an annex. All modifications to the scope of work, whether in technical requirements, evaluation questions, evaluation Team composition, methodology or timeline need to be agreed upon in writing by the technical officer.
- Evaluation methodology shall be explained in detail and all tools used in conducting the evaluation such as questionnaires, checklists and discussion guides will be included in an Annex in the final report.
- Evaluation findings will assess outcomes and impact on males and females.
- Limitations to the evaluation shall be disclosed in the report, with particular attention to the limitations associated with the evaluation methodology (selection bias, recall bias, unobservable differences between comparator groups, etc.).
- Evaluation findings should be presented as analyzed facts, evidence and data and not based on anecdotes, hearsay or the compilation of people's opinions. Findings should be specific, concise and supported by strong quantitative or qualitative evidence.
- Sources of information need to be properly identified and listed in an annex.
- Recommendations need to be supported by a specific set of findings.
- Recommendations should be action-oriented, practical and specific, with defined responsibility for the action.

The format of the final evaluation report should strike a balance between depth and length. The report will include a table of contents, table of figures (as appropriate), acronyms,

executive summary, introduction, purpose of the evaluation, research design and methodology, findings, conclusions, lessons learned and recommendations. The report should include, in the annex, any substantially dissenting views by any Team member or by USAID on any of the findings or recommendations, a copy of this Scope of Work, a list of persons and organizations contacted, and any other attachments deemed significant. The report should not **exceed 30 pages**, excluding annexes. The report will be submitted in English, electronically. The report will be disseminated within USAID. A second version of this report excluding any potentially procurement-sensitive information will be submitted (also electronically, in English) by Social Impact to USAID's Development Experience Clearinghouse (DEC) for dissemination among implementing partners and stakeholders.

All quantitative data, if gathered, should be (1) provided in an electronic file in easily readable format; (2) organized and fully documented for use by those not fully familiar with the program or the evaluation; (3) owned by USAID and made available to the public barring rare exceptions. A thumb drive with all the data could be provided to the COR.

The final report will be edited and formatted by Social Impact and provided to USAID/Bangladesh 15 working days after the Mission has reviewed the content and approved the final revised version of the report.

VII. Team Composition/ Technical Qualifications and Experience Requirements for the Evaluation Team

The Contractor will provide a team of specialists for the evaluation composed of experts in conducting assessments and evaluations of this nature. The Team will include and balance several types of knowledge and experience related to program evaluation. Individual team members should have the technical qualifications as described below. The proposed team composition will include one team leader and two team members. USAID will select/approve the proposed candidates for each position based on the proposed methodology and the strength of the candidate(s).

The specialists must all have significant developing country program experience. The Team should include experience in a relevant South-Asian context, along with comparative experience with other countries or regions in the democracy and governance sector, civil society and citizen participation. The Team should also include experience with other sectors of development, such as health, nutrition, population, education, economic growth, finance, energy, poverty reduction, and humanitarian assistance. At least one member of the Team will have experience implementing or managing anti-trafficking in persons initiatives or significant familiarity with the subject. At least one member of the Team must have overall macro-economic and political situation, and understand the structure of government and public administration in both urban and rural areas. At least one team member must have knowledge of civil society and civic participation in Bangladesh and/or the region. It is preferred that the team leader be an expatriate. Additionally, the Team should include experience in designing and facilitating group discussion.

Team Leader (International): A mid-level social scientist/political scientist with an advanced degree in a relevant discipline and at least ten (10) years of experience. Human rights experience is required; TIP experience is preferred. Asian/regional experience is desired. Prior experience and ability to conduct evaluations, in particular on human rights issues and to write well in English is required. Knowledge of USAID policy guidance and program design is preferred. The team leader will be responsible for development of the final evaluation and overall team coordination, including ensuring that team members adequately understand their roles and responsibilities, and for assigning individual data/information collection, and reporting responsibilities.

Two Team Members (Nationals): Team experience should include post-graduate level social science, law, economics, and/or political science experience. In-depth knowledge of issues relating to public opinion in developing and/or transitional economies and democracies is required. Familiarity with social science “best practices” methods and programming is essential. Experience in conducting assessments and designing strategic responses in developing countries is required. Substantial experience in conducting evaluations or assessments is expected of all members. Ability to conduct interviews and discussions and write well in English is essential. At least one member of the Team shall have training and experience in facilitating group processes, such as focus group discussions. Two team members should be resident Bangladeshi nationals, who are fluent in Bangla; are exceptionally knowledgeable about Bangladesh’s political, social, and economic situation; have TIP expertise with knowledge of human rights more generally; has preferably some understanding of USAID’s programs; and has no political or other affiliations that would negatively influence (or could reasonably be perceived as influencing) their recommendations.

Overall the Team will need expertise in USAID practices and expectations in program evaluation; program design and analysis; quantitative and qualitative data collection and analysis; survey design and analysis; program issues, innovations and challenges in promotion of public sector transparency and accountability; and USAID practices and requirements in program performance measurement.

The Team will be supported by 1-2 interpreter/translators (as needed) through the auspices of the Bangladesh Democracy and Governance Program Evaluations (BDGPE) project.

VIII. Conflict of Interest

All evaluation Team members will provide a signed statement attesting to a lack of conflict of interest, or describing an existing conflict of interest relative to the program being evaluated. USAID/Bangladesh will provide the conflict of interest forms.

IX. Scheduling and Logistics/Logistical Support and Government Furnished Property

The proposed evaluation will be funded and implemented through the BDGPE project. Social Impact will be responsible for all offshore and in-country administrative and logistical support, including identification and fielding appropriate consultants. Social Impact support includes arranging and scheduling meetings, international and local travel, hotel bookings, working/office spaces, computers, printing, photocopying, arranging field visits, local travel, hotel and appointments with stakeholders.

The Evaluation Team will be required to perform tasks in Dhaka, Bangladesh and also will travel to activity sites within the country. The evaluation Team should be able to make all logistic arrangements including the vehicle arrangements for travel within and outside Dhaka and should not expect any logistic support from the Mission. The Team should also make their own arrangement on space for Team meetings, and equipment support for producing the report.

Schedule

Task/ Deliverable	Proposed Dates
Review background documents & preparation work (offshore): Draft work plan submitted to SI's technical backup for review by 9/13 and by SI HQ to USAID/Bangladesh by 9/17 (Dhaka time)	
Travel to Bangladesh by expat Team members	
Team Planning Meeting hosted by BDGPE; In-brief with USAID/Bangladesh	
Data collection	
Analysis and product drafting in-country	
Evaluation Team submits annotated report outline and draft presentation for USAID/Bangladesh DG Team review; data collection continues (phase II) after submission of these products through 10/14	
USAID provides comments (as needed) on report outline and draft presentation	
Presentation and debrief with DG Team and USAID/Bangladesh	
Debrief meetings with key stakeholders , including GOB	
Expat Team members depart Bangladesh	
SI delivers draft report to DG Team	
Evaluation Team Leader delivers presentation to USAID/W (date to be coordinated with USAID/Washington)	
USAID and partners provide comments on draft	
Team revises draft report	
Social Impact edits/formats report	
SI delivers final report	

X. REPORTING REQUIREMENTS

The total pages of the final report, excluding references and annexes, should not be more than 30 pages. The following content (and suggested length) should be included in the report:

Table of Contents

Acronyms

Executive Summary - concisely state the program purpose and background, key evaluation questions, methods, most salient findings and recommendations (2-3 pp.);

1. **Introduction** – country context, including a summary of any relevant history, demography, socio-economic status etc. (1 pp.);
2. **The Development Problem and USAID’s Response** - brief overview of the development problem and USAID’s strategic response, including design and implementation of the ACT program and any previous USAID activities implemented in response to the problem, (2-3 pp.);
3. **Purpose of the Evaluation** - purpose, audience, and synopsis of task (1 pp.);
4. **Evaluation Methodology** - describe evaluation methods, including strengths, constraints and gaps (1 pp.);
5. **Findings/Conclusions** - describe and analyze findings for each objective area using graphs, figures and tables, as applicable, and also include data quality and reporting system that should present verification of spot checks, issues, and outcomes(12-15 pp.);
6. **Lessons Learned** - provide a brief of key technical and/or administrative lessons on what has worked, not worked, and why for future program implementation or relevant program designs (2-3 pp.);
7. **Recommendations** – prioritized for each key question; should be separate from conclusions and be supported by clearly defined set of findings and conclusions. Include recommendations for future program implementation or relevant program designs and synergies with other USAID program and other donor interventions as appropriate (3-4 pp.);

Annexes – to include statement of work, documents reviewed, bibliographical documentation, evaluation methods, data generated from the evaluation, tools used, interview lists, meetings, focus group discussions, surveys, and tables. Annexes should be succinct, pertinent and readable. Annexes should also include if necessary, a statement of significant unresolved difference of opinion by funders, implementers, or members of the evaluation Team on any of the findings or recommendations.

The report format should be restricted to Microsoft products and 12-point type font should be used throughout the body of the report, with page margins one-inch top/bottom and left/right.

ANNEX II: PERSONS CONTACTED

UNITED STATES OF AMERICA

State Department

Arati Shroff (F)-Bangladesh desk officer

Ben Barry(M)-Bangladesh desk officer

Amy McGann(F)-TIP point of contact for South and Southeast Asia Regional Bureau

USAID

Elizabeth Callendar(F)-TIP point of contact

Natasha Greenberg(F)-Human Rights Specialist

Ananta H. Cook (F)-Bangladesh desk officer, Desk Officer for Bangladesh

Jason Smith (M)-Incoming DG program officer

Winrock International

Laura Romah (F)-Program Associate (Empowerment and Civic Engagement)

Olga Di Pretoro (F)-Program Manager (telephonically from Panama)

BANGLADESH

Police - Dhaka

Md. Liaquat Ali Rokoni - Asst Superintendent of Police. TIP Cell (M)

Md. Helaal Uddin Badri - Legal Inspector General (M)

Ministry for Expatriate Welfare and Overseas Workers

Kazi Abul Kalam - Deputy Secretary (M)

Winrock International (WI)

Sarah Stephens - WI CoP (F)

Suraia Banu - Program Manager Legal Reform and Advocacy (F)

Dipta Rakshit - Program Manager Survivor Services (F)

Samina Atique - Capacity Building (F)

Sushanta Kumar Parkar - M&E Specialist (M)

USAID

Habiba Akter - USAID (F)

Rumana Amin - USAID (F)

Sherina Tabassum - USAID (F)

Sumana Binte Masud - USAID (F)

UN Office on Drugs and Crime (UNODC)

ABM Kamrul Ahsan - Programme Coordinator (M)

Bangladesh National Woman Lawyer's Association (BNWLA)

Salima Ali, Executive Director (F)

Al Hassan, Director-Projects (M)
Nafiz Imtiaz Hasan, Project Coordinator (M)

Dhaka Ahsania Mission (DAM)

Dewan Sohrab Uddin, Deputy Director of Programmes (M)
Dipak Kumar Sarkar, Project Coordinator ACT (M)
Ferdousi Akhter, Project Coordinator Missing Children Alert (MCA) (F)

SHISUK

Sakiul Millat Morshed - Executive Director (M)
Md. Rafiqul Islam Khan - Project Manager ACT-SS Program (M)
Md. Zillur Rahman-Director Programs (M)

IOM

Nishat Chowdhry, National Programme Officer (F)

ACLAB

Tarikul Islam-Exec Director (M)
Ruma Parveen-Program Officer (Child Labour) (F)
Golam Ahmed-Deputy Director, Alliance for Co-operation & Legal Aid Bangladesh (M)

CWCS

Prof. Ishrat Shamim, President-Centre for Women and Children Studies (F)

USAID

Dr. Sharmina Sultana - Project Manager Specialist, Office of Population, Health, Nutrition and Education (F)

Department of State

Joanna Schenke-Political Officer/TIP Expert (F)

USAID

Felicia Wilson, Ph.D - Senior Education Advisor (PHNE) (F)
Mohammad Shahidul Islam- Education Team Leader (PHNE) (M)
Ramona El Hamzaoui - Director, Economic Growth Office (F)
Jason Seuc - Environment Officer , Economic Growth Office (M)
Tamar Barabadze - GCC Advisor, Economic Growth (F)
David Yanggen - Deputy Director of Economic Growth, Agriculture and Food Security (M)

Ministry of Home Affairs

Rukhsana Hasin, Deputy Secretary & Project Director-Anti Trafficking Mechanism & Monitoring Project (F)
Md. Delwar Hassain Sarker, MIS Officer (M)

Union Parishad Leaders: Jessore FGD-(9M, 2F)

Parul Akhter, Community Volunteer
Md. Shohidullah, member of Anti Trafficking Unit
Md. Rabiul Islam, member of Anti Trafficking Unit
Sahabuddin, member of Anti Trafficking Unit
Ruma, member of Anti Trafficking Unit
Md. Ismail Hossain, member of Anti Trafficking Unit
Abdur Rahim, Community Volunteer
Shoriful Islam, Community Volunteer
Md. Hossain Ali, Community Volunteer
Abdur Rashid, member of Anti Trafficking Unit
Md. Abu Hanif, Video Watcher

Former Court Yard Meeting Participants: Jessore FGD (12F- 8M)

Razia Khatun
Parul Akhter
Sukhjan
Arjina
Halima Khatun
Sahar Banu
Moyna
Sirina Khatun
Mukta Khatun
Fatema Khatun
Aleya
Sahar Banu
Sabur Hossain
Rubel Haque
Joshim Uddin
Anamul Haque
Shofiqul Islam
Azim Uddin
Ripon Uddin
Shahin Chaklader

School Teachers, Pakshia High School, Dihi, Sharsha, Jessore: Jessore

Abdus Samad, Head Manster (M)
Fazlur Rahman, Religious Teacher (M)
Khaleda Khatun, Social Science Teacher (F)

School Students: Jessore FGD (8 M)

Shimul Hossain
Abu Saleh
Shamim Reza
Rafiqul Islam
Zakir Hossain
Zahirul Hossain

Shipon Hossain
Mamun Hossain

Rights Jessore (1F-7M)

Nabanita Saha, Program Officer, RJ
Sudip Mondal, Project Coordinator, RJ
Bazlur Rahman, Fact Finding Officer, RJ
Feroz Ali, Facilitation Officer
Md. Momtaz Ali, Facilitation Officer
Binoy Kumar Mollick, ED, RJ
Md. Ashraful Alom, Advocacy Officer, RJ
Azharul Islam, PC, RJ

Police

Joydeb Kumar Bhadra, SP, Jessore (M)

Prosecutors: Jessore, FGD (7M)

A. Z. M. Feroz, Public Prosecutor
Shorif Noor Md. Ali Reza, Special Public Prosecutor
Sajjad Mostofa Raza, Advocate
Debasish Roy, Advocate
Mizanur Rahman Mintu, APP
Ruhul Quddus Kochi, APP
Badruzzaman Palash, APP

Journalists Jessore FGD(7M)

Mizanur Rahman Tota, President, Jessore Press Club
Sajed Rahman Bokul, District Correspondent, Janakantha
Touhidur Rahman, District Correspondent, Samakal
H.R. Tuhin, Senior Sub Editor, Spondan
Milon Rahman, News Editor, Daily Somajer Kotha
B.M. Asad, Staff Reporter, Daily Loko Somaj
Rimon Khan, Staff Reporter, Spondan

DAM Shelter Home: Jessore

Shahana Khandaker, Home Manager, DAM, Jessore (F)
Md. Halim, Integration Officer, DAM, Jessore (M)

Survivors Voice: Jessore, (2F, 1M)

Rafiqul Islam
Nasrin Akhter Nishi
Tamanna Akhter

Survivors FGD: Jessore, (6F)

Piya Khan
Lima

Joshna
Shorifa
Rozina Khatun
Rumana Akhter

Change Maker: Jessore

Shahana Akter, District Co-ordinator, Change Maker, Jessore (F)
Shaikh Arif Saify, Assistant Program Officer, Change Maker, Jessore (M)

RMMRU

Dr. Tasneem Siddiqui, Founder Chair (F)

YPSA Cox's Bazar (1F, 3M)

Md. Belal, Project Coordinator
Hosna Ara Rekha, Counselor & Shelter Manager
Omar Sadque, Integration officer
Faridul Alam, Social Mobilizer

Civil Society, Cox's Bazar

Md. Khoka (M)

Social Welfare Dept-Cox's Bazar

Protim Kumar Chowdhury, Deputy Director (M)
Major Meftal UI Islam - BGB, Cox's Bazar (M)
Lt. Col. Khalekuzzaman - BGB, Cox's Bazar (M)

YPSA - Cox's Bazar FGD (9F)

Beauty Aktar
Jesmin Begum
Morium
Mina Aktar
Rahima
Ruby Aktar
Reshma Aktar
Munni Aktar
Monoara Begum

Survivors Voice - YPSA, Cox's Bazar (1F, 6M)

Mr. Jashim
Sirazul Islam
Imran Hossain
Anwar Hossain
Helal Uddin
Ula Mia
Swapna Barua

BSHER

Courtyard Meeting Participants - Ramu-Cox's Bazar FGD (10F)

Arefa Aktar
Muslema Aktar
Jarina Begum
Tayaba Khatun
Shamsun Nahar
Saheda Aktar
Khusnuma Aktar
Jesmin Aktar
Tafura Begum
Rumana Aktar

BSHER - Ramu, Cox's Bazar (1F, 2M)

Bishwait Bhownick, Project Coordinator
Nasrin Haque, Field Facilitation Officer
Setu Chowdhury, Field Facilitation Officer

Community Stakeholders, Ramu, Cox's Bazar, FGD (1F, 5M)

Suranjit Dey, Religious Leader, Ramu
Nurul Hakim, Religious Leader, Ramu
Afsana Jesmin Popy, Elected Leader (UP member), Ramu
Shoriful Haque, Teacher (Madrasa), Ramu
Mohammad Shah, Business Professional, Ramu
Showkat Islam, School Teacher, Ramu

CTC members, Ramu, Cox's Bazar FGD (6M)

Kajol Barua,
Shipon Barau,
Shobuj Barua,
Shupod Barua,
Bivash Barua
Arup Barua

Department of Social Services (F)

Nasima Begum, Director General

Social Welfare Ministry (M)

Ranajit Biswash, Former Secretary

USAID

Shahnaz Zakaria, Food Aid Advisor, FDHA (F)

ANNEX III: REFERENCES

ARD, *Bangladesh Democracy and Governance Assessment, August 2009*

Blanchet, Thérèse - Drishti Research Centre, *Efforts and Needs to Combat Trafficking in Persons (TIP): An assessment, 2009*

BNWLA & Save the Children Sweden, *Handbook on Comprehensive Support for Survivors & Study on Sustainable Integration, (2007)*

Centre for Women and Children Studies, *State of Trafficking in Women and Children and their Sexual Exploitation in Bangladesh, (2010)*

ILO, Trafficking in children-South Asia (TICSA), *Rapid Assessment on Trafficking in Children for Exploitative Employment in Bangladesh, 2002*

Winrock International, ACT program, *Role of Recruiting Agencies in the Recruitment Process to Ensure Safe Migration in order to Prevent Human Trafficking, May 2012*

Winrock International, ACT program, *Study on Prosecuting Human Trafficking cases: Practices, Lesson Learned and Remedies, 2011*

UNODC, *Anti-Human Trafficking Manual for Criminal Justice Practitioners, 2009*

USAID, Center for Democracy and Governance, [Handbook of Democracy and Governance Program Indicators](http://dmeforpeace.org/sites/default/files/USAID_Handbook%20of%20Democracy%20and%20governance%20program%20indicators_0.pdf), available on-line at http://dmeforpeace.org/sites/default/files/USAID_Handbook%20of%20Democracy%20and%20governance%20program%20indicators_0.pdf

USAID, CDCS Guidance, Version 3, available online at http://www.usaid.gov/sites/default/files/documents/1870/CDCS_Guidance_V3.pdf

USAID, *Counter Trafficking in Persons Field Guide, 2013*

USAID, *Counter Trafficking in Persons Policy, 2012*

USAID, *USAID Anti-Trafficking in Persons Programs in Asia: A Synthesis, 2009*

USAID, *Trafficking in Persons: USAID's Response, 2005*

Ministry of Home Affairs, GOB, *NPA for Combating Human Trafficking 2012-2014*

Ministry of Home Affairs, GOB, *Bangladesh Country Report, 2010, 2011 & 2012 Combating Human Trafficking,*

SHISUK, *Echo: Survivors Voice*, April 2012

USAID, *Bangladesh Strategy, Annual Reports, , Performance Monitoring Plan, DQA report 2010, ACT agreement, amendments, sub-grants and sub-contracts, work plans (year 1,2 3, and 4), semiannual reports, and program performance reports for year 1 and 2*

Planning Ministry, GoB, *Bangladesh Sixth Five Year Plan, FY 2011- FY 2015*

Winrock International, ACT program, ACT Internal Mid-Term Evaluation Report

Winrock International, ACT program, *ACT annual PMPs*

Winrock International, ACT Program, annual and semiannual reports (2009, 2010, 2011, 2012 & 2013)

Winrock International, ACT Program Partners Recommendations for Improving Implementation of the National Plan of Action to Combat Trafficking in Persons (NPA) 2012-2014. National Conference on Bangladesh's 2012 Trafficking in Persons Law and the National Plan of Action 2012-2014: From Adoption to Implementation. July 2, 2013 - Dhaka.

Department of State's Annual Trafficking in Persons Reports (2009, 2010 2011, 2012, and 2013)

Deterrence and Suppression of Human Trafficking Act, 2012 (Draft English version)

ANNEX IV: DATA COLLECTION TOOLS

I. SAMPLE QUESTIONS FOR INTERVIEWS

Prevention

- Do you target your programs at "at-risk" communities? If so, how?
- What role does the media play in your campaigns? Is there any particular type of media that you use more than others? What commitment, if any, has the media made to long-term coverage/focus of human trafficking?
- How many individuals do you believe you have reached with your campaign?
- Does your program have any component for engaging those made aware of trafficking to continue to spread the message themselves?
- What difficulties, if any have you encountered in running your campaigns?
- Do you feel there is adequate cooperation between the education sector, local government and NGOs on this initiative? Give examples either way.
- Do you feel you have been successful in expanding the focus on trafficking to include labor migration and the exploitation of men?

Prosecution

- Do you think the trainings provided have improved your ability to investigate/prosecute/render a just verdict and sentence in a trafficking prosecution?
- If so, how specifically?
- Has the training on trafficking helped you in your work? Can you give a recent example?
- How would new staff learn these skills?
- Have the trainings improved the allied criminal justice community's performance in effectively responding to trafficking cases? Can you give an example of a particular staff member?
- Are the front-line professionals competent to work on trafficking cases? What skills do you feel they still need?
- Do you see any problems in the existing human trafficking legislation? If so, give specific examples.
- Do you feel there is sufficient multi-disciplinary cooperation between police, prosecution and social services/victim support?
- Are you aware of the NPA on human trafficking? Please describe your understanding of the NPA.
- Are you aware of an SOP for investigating cases of trafficking? Please describe your understanding of the SOP.
- Are you aware of the Police Authority's Criminal Database on crimes, prosecutions, criminals and victims?

Protection

- How do you identify victims (i.e. self-reporting/at-risk evaluation/referral from criminal justice professionals)?
- How many victims of trafficking have you identified since ACT began?
- Do you feel the information/support you received from ACT enhanced your ability to identify victims?
- Are you aware of any survivors you've worked with having been re-trafficked?
- If so, please describe the particulars of that case?
- What are the greatest risks to victims in your community?
- How do you respond to that threat/challenge?
- Can you give examples of survivors who have secured employment or become self-employed through skills learned through your organization?
- Do you feel the services provided adequately meet the needs of survivors?
- What other service would you most like to see added?
- Do you have any educational components to your program?

4 – Gender and Disability Issues

- Could you explain your understanding of the role of gender and/or disability in cases of trafficking?
- What special services/procedures do you provide to/for the physically/mentally/emotionally challenged?
- How have you incorporated gender sensitivity into your programs/protocols/work?
- What training, if any, have you had on the role of gender and/or disability (or age or other vulnerabilities) and its impact on trafficking?
- What is the ratio of male to female survivors you work with?
- Have you ever dealt with a case of a disabled survivor?
- What were the challenges you faced?
- Do you feel you are better capable of handling these cases since the program's inception?

II. CHECKLIST OF ADDITIONAL POTENTIAL QUESTIONS

National coordination (national and local level)

- What kind of coordination exists among law-enforcement agencies to combat the trafficking?
- What kind of cooperation exists between law enforcement and other government agencies and non-government service providers, including community organizations?
- If a national coordinating body or committee exists, which agencies are represented on it?
- Who chairs the body or committee? What are the tasks and duties of the body or committee?
- Are mechanisms in place to enable and facilitate cooperation between law-enforcement officers, the prosecution service and judicial entities in relation to the human trafficking, where the legal system allows?

Training: availability

- How are training needs assessed?
- Have any training plans been developed by any of the agencies involved in enforcing anti trafficking measures?
- Is there a measure of accreditation applied to ensure the quality and standardization of training?
- Is there a cross-agency training program?
- Does the training involve participants from multiple agencies (domestic and foreign)?
- Are members of the prosecution service and judiciary involved in the training of law-enforcement personnel (as participants and/or trainers or guest presenters)?
- Are officials of general police agencies, immigration and labour departments and other agencies trained in issues related to the law and trafficking issues?
- Are officials provided with specific foundation training when they join?
- Do staff remain in their function after receiving relevant training?

Border control: cooperation and coordination

- What measures are in place to foster cooperation among border control agencies—domestically and across borders—especially in relation to combating the trafficking issues? Are there direct channels of communication?
- What measures are in place to detect instances of smuggling of migrants at authorized border crossing points as well as to detect illegal border crossings?
- Are officials at border-crossing points trained to detect document fraud?

Organization of the prosecution service

- What is the role of the prosecutor in relation to trafficking offences? What is the prosecutor's role at trial, at sentencing and on appeal?
- How is the prosecution service organized?
- Does the prosecution service have specialized staff or units for prosecuting trafficking cases or organized crime?
- What working relationship exists between immigration, law-enforcement units, other agencies involved in detecting and investigating trafficking cases and the prosecution?

Operation of the prosecution service

- At what stage of the investigation are prosecutors involved? What is the role of the prosecutor in relation to the investigation?
- In jurisdictions where the police file the original charging documents, how many criminal cases involving trafficking are received by the prosecution service annually?
- In jurisdictions where the prosecutor is responsible for the filing of charges in court,
- How many such cases are filed annually?
- Is there a backlog of cases involving trafficking?

Training of prosecutors: availability

- Where specialized units charged with prosecuting trafficking offences exist: how are people selected for these units?
- What foundation training is given to persons joining the prosecution service? Is specialized training on the issues and law related to trafficking offered to new staff members and/or to existing staff? How often do prosecutors receive refresher training?
- What ongoing and specialized training courses are available? How are training needs assessed?

Training of the judiciary: availability

- What foundation training is given to new judges and to other employees?
- Is specialized training on the law and trafficking issues offered to new staff members and/or to existing staff?
- What general and specialized training is given to judges involved in trafficking and organized crime cases?
- How often do judges and other court personnel receive refresher training?

III. ADDITIONAL QUESTIONS

Additional Questions for Field Trainings

I. Relevance/Results (Goals and flexibility to adapt program services/activities, etc.)

- What are your program's goals? How did you determine them?
- Where have you succeeded in reaching those goals?
 - Give examples.
- Where have you met challenges?
 - What were they, SPECIFICALLY?
 - How did you deal with those obstacles?
- Are there any topics/activities/projects that have been added to the program in response to your experience?
 - If so, what?
- Are there any topics/activities/projects that you would like to include in your service provision, but currently are not able/ allowed to do?
 - What are they?

2. Management & Administration (Working relationship)

- Has WI/USAID been flexible/ supportive to work with?

- Have they helped you to respond to new/unforeseen challenges or opportunities? Give examples.

FOR IMPLEMENTING PARTNERS

- What sort of capacity building has WI/USAID engaged with for your program? EX: training, materials, etc...

III. M&E (tracking results and indicators used)

- Tracking - what is your monitoring system/how do you keep track of your results?
- What indicators do you look at (ex: number of people reached with Public Awareness campaign, number of survivors serviced, etc...) to track results?
- Does that information play a part in future management/program decisions
 - i.e. how do you incorporate lessons learned into new/future/on-going programs/activities, etc...?
 - Are your results shared with others (WI/GOB)?
 - How often, with whom?
 - How are they used by the GOB?

IV. Schools (Public Awareness) - possible FGD opportunity

- A. If working with **learners**, the following types of questions may apply:
- What type of program did you have on Trafficking (TIP)?
 - Had you ever heard of TIP before the program?
 - How do you explain TIP - what's your understanding of it?
 - What did you learn from the program?
 - Did you like the program - what did you like?
 - What would you have liked better (better ideas for future audience appeal)?
 - Have you talked about TIP since the program with anyone (ex: family, friends, neighbors, etc.)?
 - What do you tell them?
- B. If talking with **service provider**, the following questions may apply:
- What is the fundamental message of your program?
 - How long have you been providing this program to learners?
 - How often do you provide programs on TIP in the schools?
 - How do you decide which learners receive this information?
 - What have you found is the most effective way to deliver services to learners?
 - Do you request feedback from the learners in any manner?

ANNEX V: DISCLOSURE OF CONFLICT OF INTEREST

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Susan Kreston
Title	Consultant
Organization	Bangladesh Democracy and Governance Program Evaluations (BDGPE), implemented by Social Impact, Inc.
Evaluation Position?	<input checked="" type="checkbox"/> Team Leader <input type="checkbox"/> Team member
Evaluation Award Number(contract or other instrument)	Contract # AID-OAA-I-10-00003 Task Order # AID-388-TO-12-00001
USAID Project(s) Evaluated(Include project name(s), implementer name(s) and award number(s), if applicable)	USAID Integrated Protected Areas Co-Management (IPAC) Final Performance Evaluation
I have real or potential conflicts of interest to disclose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i></p> <ol style="list-style-type: none"> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation. 	

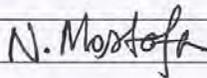
I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	<i>Susan Kreston</i>
Date	3/20/2013

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Md. Naim Mostofa
Title	Research Specialist
Organization	Bangladesh Democracy and Governance Program Evaluations (BDGPE), implemented by Social Impact, Inc.
Evaluation Position?	<input type="checkbox"/> Team Leader <input checked="" type="checkbox"/> Team member
Evaluation Award Number(contract or other instrument)	Contract # AID-OAA-I-10-00003 Task Order # AID-388-TO-12-00001
USAID Project(s) Evaluated(Include project name(s), implementer name(s) and award number(s), if applicable)	ACT: Actions for Combating Trafficking-in-Person Project
I have real or potential conflicts of interest to disclose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i></p> <ol style="list-style-type: none"> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation. 	

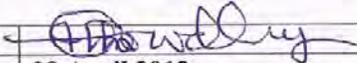
I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	
Date	09 April 2013

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	A.J.M. Ifjalul Haque Chowdhury
Title	ACT Team Member
Organization	Bangladesh Democracy and Governance Program Evaluations (BDGPE), implemented by Social Impact, Inc.
Evaluation Position?	<input type="checkbox"/> Team Leader <input checked="" type="checkbox"/> Team member
Evaluation Award Number(contract or other instrument)	Contract # AID-OAA-I-10-00003 Task Order # AID-388-TO-12-00001
USAID Project(s) Evaluated(Include project name(s), implementer name(s) and award number(s), if applicable)	Combating Trafficking-in-Person (ACT) Midterm Evaluation
I have real or potential conflicts of interest to disclose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i></p> <ol style="list-style-type: none"> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation. 	

I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	
Date	28 April 2013

U.S. Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523