Combating Forced Labor and Labor Trafficking of Adults and Children in Ghana (FLIP)

Midterm Evaluation Report

Funding is provided by the United States Department of Labor under cooperative agreement number IL-31474. 100% of the total costs of the project or program is financed with federal funds, for a total of USD $2,000,000.

Presented by
Dr. Albert Arhin, Dr. Olivia Agbenyega, and Mr. Kwaku Obeng-Okrah

31 January 2020
Acknowledgements

The authors acknowledge several people who contributed to and supported the evaluation of this project. Special thanks go to Amanda Foster, Allison Arbib, Josephine Dadzie, Ilana Cohen, and Helga Osei Aku from Verité who provided advice and support that made it possible for the evaluation team members to successfully execute this task. We also thank John Nkrumah Mensah, Richard Tetteh and Paul Manyigbor who served as research assistants and supported the data transcription and analysis related to the evaluation. Finally, the authors would also like to thank the stakeholders (staff and institutions) connected to the project who hosted the team members for visits and/or availed themselves for telephone interviews. The research team greatly appreciates the time and attention of each individual who contributed to the data collection activities and helped support this evaluation.

Disclaimer

This report was prepared for Verité to be submitted to the US Department of Labor. The authors are Dr. Albert Arhin, Dr. Olivia Agbenyega, and Mr. Kwaku Obeng-Okrah (independent consultants based in Ghana). The views expressed are those of the authors and should not be attributed to the Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement of same by the U.S. Government.
Executive Summary

With funding from the Bureau of International Labor Affairs (ILAB) of the United States Department of Labor (USDOL), Verité, an international labor rights NGO, is working to improve monitoring for forced labor in Ghana, West Africa. The project is working to support stakeholder understanding of forced labor and forced labor indicators, integrate forced labor into labor monitoring systems, and strengthen the capacity of the labor inspectorate to identify and address forced labor.

This report presents findings from a midterm evaluation of the project. The purpose of the midterm evaluation is to examine the project’s relevance as well as the validity and effectiveness of the project’s strategy. This includes determining if the project is on track to meet its targets, identifying challenges and opportunities, and assessing the project’s sustainability plan.

Methodological Approach

The evaluation approach was largely qualitative and participatory in nature. Qualitative information was obtained through interviews. The participatory nature of the evaluation was meant to reinforce a sense of ownership among stakeholders and project participants. Data collection methods and stakeholder perspectives were triangulated for as many evaluation questions as possible. The approach to the evaluation maintained some flexibility, which allowed additional questions not originally included in the interview guide to be posed.

Results

Perception of project relevance

All stakeholders interviewed pointed out that there had been little national conversation on the subject of forced labor and that there is little familiarity of forced labor indicators. Information obtained from national stakeholders point to a consistent narrative that the project design is highly relevant for Ghana and the context in which it is operating.

Progress on improving understanding of indicators of forced labor, including indicators of labor trafficking

Findings suggest that the project’s activities completed to date are improving stakeholders’ understanding of indicators of forced labor, including indicators of labor trafficking. As part of the evaluation, interview respondents were asked to provide their understanding of forced labor—which were cross-checked against the definitions provided during trainings. For example, when asked to describe indicators of forced labor, 14 out of the 27 stakeholders interviewed showed ‘high’ familiarity (mentioned more than 3 indicators); 7 stakeholders showed ‘low’ familiarity (mentioned just 1 indicator); while 5 showed ‘medium’ familiarity (mentioned 2-3 indicators).

Progress on improving monitoring of working conditions by labor stakeholders to identify indicators and address incidents of forced labor and labor trafficking

Several institutions across the government and private sector have begun plans to incorporate forced labor indicators into their organization’s labor systems. However, many institutions were
just at the early stage of operationalizing forced labor at the time of the evaluation, which is in line with the project timeline.

**Level of stakeholder participation**

Findings from the evaluation show that the project has been effective in bringing a wide range of stakeholders together to generate discussions on forced labor indicators. However, participation of the various stakeholders, their degree of commitment to project execution, and their contribution towards the project’s objectives have not been uniform. Stakeholders from the private sector are particularly less engaged compared to those in the public and civil society sectors.

**Challenges and barriers to implementation**

Time constraints for attending trainings, meetings, and other engagements is a major challenge for several stakeholders, which prevents some targeted stakeholders from attending project activities. Although stakeholders unavailable for meetings send representatives, their absence may slow the capacity building process targeted for them. Other challenges and barriers relate to the fact that incorporating knowledge of forced labor into an organization’s systems and procedures often takes time. Some stakeholders also perceived and expressed fears that openly talking about forced labor and incorporating indicators in labor monitoring systems without the accompanying resources to monitor and reduce risk prevalence may damage Ghana’s reputation in the long term.

**Perceptions around sustainability of the project**

There is a strong perception that outcomes and gains achieved by the project could be sustained and owned. While the project has done well to connect and obtain buy-in from technical staff across various government departments, there is a need for Verité to engage more political officers, particularly, the leaders of the various ministries that have a mandate to monitor labor or develop labor monitoring systems.

**Lessons and Good Practices**

Generally, the findings suggest that the project has been effective in bringing a wide range of stakeholders together to generate discussions on forced labor indicators. The project’s actions on training and sensitization, broadened consultation, alignment of project activities to key stakeholders’ current efforts, formation of a Technical Working Group (TWG), and circulation of a newsletter and project updates to a wider group are all perceived as good practices which have enhanced the successes achieved by the project so far. In addition, the project has offered lessons on the essence of securing stakeholder buy-in and the need for projects to be designed to address real needs, which can enhance future programs.

**Recommendations**

The evaluation team proposes the following recommendations for Verité to achieve the project’s goal:
• Recommendation 1: In addition to ongoing outreach, continue to improve communication via official channels such as the project website and regular newsletters.

• Recommendation 2: Improve actions to obtain buy-in from both technical and political actors.

• Recommendation 3: Design a post-training plan and follow-up with training participants to offer further knowledge-building support. As the project progresses, it will be important for Verité to ensure post-training support is implemented.

• Recommendation 4: Engage private sector actors and improve capacity building opportunities.

• Recommendation 5: Strengthen the Technical Working Group by clearly articulating their roles and expected contributions to the project, improving engagement with members between meetings, providing very advanced notice for meeting days, and possibly establishing sub-groups within the TWG to handle specific tasks or targets.

• Recommendation 6: Continue to ensure clear communication and framing around the core objective of the project.

• Recommendation 7: Maximize gains by broadening engagement with 'high relevancy' stakeholders.
**List of Acronyms**

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>FL</td>
<td>Forced Labor</td>
</tr>
<tr>
<td>FLIP</td>
<td>Forced Labor Indicators Project</td>
</tr>
<tr>
<td>ICI</td>
<td>International Cocoa Initiative</td>
</tr>
<tr>
<td>ILAB</td>
<td>United States Department of Labor’s Bureau of International Labor Affairs</td>
</tr>
<tr>
<td>ILO</td>
<td>International Labour Organization</td>
</tr>
<tr>
<td>NORC</td>
<td>National Opinion Research Center at the University of Chicago</td>
</tr>
<tr>
<td>OCFT</td>
<td>Office of Child Labor, Forced Labor, and Human Trafficking</td>
</tr>
<tr>
<td>TWG</td>
<td>Technical Working Group</td>
</tr>
<tr>
<td>USDOL</td>
<td>United States Department of Labor</td>
</tr>
</tbody>
</table>
# Table of Contents

Executive Summary .................................................................................................................. 3  
List of Acronyms ..................................................................................................................... 6  
1. Background and Overview .................................................................................................. 9  
   1.1 Project Background ........................................................................................................ 9  
   1.2 Project’s Theory of Change .......................................................................................... 9  
2. Purpose and Scope of Evaluation ......................................................................................... 11  
   2.1 Purpose of Evaluation .................................................................................................. 11  
   2.2 Evaluation Questions ................................................................................................... 11  
3. Evaluation Methodology ...................................................................................................... 12  
   3.1. Approach .................................................................................................................. 12  
   3.2 Data Collection Methodology ...................................................................................... 12  
   3.3 Ethical Considerations and Confidentiality .................................................................. 15  
   3.4 Limitations .................................................................................................................. 15  
4. Evaluation Findings .............................................................................................................. 16  
   4.1 Perceptions of Relevance of the Forced Labor Indicator Project .................................. 16  
   4.2 Project effectiveness .................................................................................................... 16  
   4.3 Progress on Improving Understanding of Indicators of Forced labor, Including Indicators of Labor Trafficking ........................................................................................................ 17  
   4.5 Stakeholder Participation .............................................................................................. 23  
   4.6 Stakeholder Commitment to Project Execution and Contribution to the Project’s Objectives ................................................................................................................. 24  
   4.7 Challenges and Barriers Facing Project Implementation .............................................. 24  
   4.8. Sustainability and the Technical Working Group ....................................................... 25  
5. Good Practices and Lessons Learned ................................................................................... 26  
6. Recommendations ............................................................................................................... 28  
7. Conclusions ......................................................................................................................... 30  
References .............................................................................................................................. 32  
Annexes .................................................................................................................................. 33  
   Annex 1: List of Documents Reviewed ............................................................................... 33  
   Annex 2: Stakeholder Convening Agenda .......................................................................... 34  
   Annex 3: Interview Guide .................................................................................................. 35  
   Annex 4: Question Matrix .................................................................................................. 39
LIST OF TABLES

Table 1: Overview of stakeholders selected for interviews

Table 2: Objective 1 targets vs actuals | Overview of progress toward improving understanding of indicators of forced labor

Table 3: Objective 2 targets vs actuals | Overview of progress toward improved monitoring of working conditions by labor stakeholders

Table 4: Criteria for stakeholder participation levels

LIST OF FIGURES

Figure 1: Project’s Theory of Change

Figure 2: Overview of data analysis process

Figure 3: Stakeholder familiarity and knowledge around forced labor indicators

Figure 4: Number of respondents that mentioned each FL indicator
1. Background and Overview

1.1 Project Background

Over the last decade, the United States Department of Labor’s Bureau of International Affairs (ILAB) Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) and its grantees have made significant gains in monitoring child labor issues in Ghana. OCFT has effectively mobilized stakeholders within Ghana around child labor issues across various sectors. To build on this progress, ILAB provided funding to Verité, an international labor rights NGO, to advance the capacity of government, private sector, civil society, and other stakeholders in Ghana to combat forced labor and labor trafficking of adults and children through the promotion of an innovative and actionable approach to understand and address forced labor grounded in the indicator-based framework developed by the International Labour Organization (ILO). Verité is partnering with the National Opinion Research Center at the University of Chicago (NORC) and the International Cocoa Initiative (ICI) to implement the project.

The project, referred to throughout the report as the Forced Labor Indicators Project (FLIP), promotes the use of the ILO framework as a shared vocabulary and analytic framework for use by law enforcement, private sector due diligence monitors, social service actors, and civil society organizations. The project is leveraging the established programming and monitoring infrastructure in Ghana for combatting child labor in the cocoa industry and will build upon learnings from this experience to adapt tools and approaches in other sectors prone to forced labor vulnerabilities. The project coordinates closely with a range of labor stakeholders in the cocoa sector, oil palm sector, and gold sector to achieve the following outcomes:

- **Outcome 1:** Improved understanding of indicators of forced labor, including indicators of labor trafficking.
- **Outcome 2:** Improved monitoring of working conditions by labor stakeholders to identify indicators and address incidents of forced labor and labor trafficking.
- **Outcome 3:** Strengthened capacity of the labor inspectorate to address forced labor and labor trafficking.

As part of this project, an independent consultant was contracted to conduct a midterm evaluation to assess the relevance, progress, challenges, and lessons learned, and to determine whether the project is on track to meet its targets. This report presents the findings of the midterm evaluation.

1.2 Project’s Theory of Change

This project promotes the use of the ILO framework on forced labor indicators as a shared vocabulary and analytic framework for use by law enforcement, private sector due diligence monitors, social service providers, and civil society actors in Ghana. The project’s Theory of Change can be summarized as follows (Figure 1):
ASSUMPTIONS

- Will of government stakeholders to participate: Engagement with key government offices and ministries is an important project component but engagement could be challenged by political turnover or other shifts in mandates/priorities.
- Will of civil society organizations to participate: Civil society organizations, even when eager to participate, may be short on resources to support engagement and may have to juggle competing demands for time and attention from their own stakeholders.
- Will of private sector organizations to participate: Private sector organizations, who will be particularly important to the sector-based approach of this project, may experience shifts in priorities from the highest level of their corporate governance. They may also be cautious about potential reputational risks that they fear could come from working on forced labor issues specifically.
- For any institution, individuals will be made available by their supervisors to be able to participate in project activities.

Source: Comprehensive Monitoring and Evaluation Plan (CMEP)
2. Purpose and Scope of Evaluation

2.1 Purpose of Evaluation

This midterm evaluation serves as an implementation evaluation of the first half of the project. The purpose of the midterm evaluation is to examine the project’s relevance as well as the validity and effectiveness of the project strategy. This includes determining if the project is on track to meet its targets, identifying challenges and opportunities, and assessing the project’s sustainability plan.

2.2 Evaluation Questions

Relevance

1. How relevant is the project’s design and Theory of Change in light of the present context in which it operates? Does the available qualitative and quantitative information confirm the Theory of Change to be valid and accurate?

2. Have any changes to the national landscape impacted the critical assumptions articulated in the Theory of Change? If so, does the project have a strategy for adaptation?

Effectiveness

3. At the midpoint of the project, is the project on track to meet its targets (per Annex 1 of the TOR)? What are the factors driving or hindering results so far?

4. What are the current challenges that the project is facing in its implementation and what efforts have been made to overcome these challenges?

5. What is the level of participation of the various stakeholders, their degree of commitment to project execution, and their contribution towards the project’s objectives?

6. What barriers to project implementation do stakeholders perceive – either in the national landscape or within their own workstream or institutions?

7. How can the Technical Working Group best support achievement of project outcomes?

8. How can the online learning platform best support the needs of Ghanaian stakeholders?

Sustainability

9. Are the project outcomes and sub-outcomes sustainable at the local and/or national level?\(^1\) Do national and local partners perceive project activities to be useful and are they prepared to take ownership?

10. What specific actions should USDOL, Verité, and other project stakeholders take to promote

---

\(^1\) It is understood that this question can be answered only to the extent that the project has assessed its outcomes and sub-outcomes. This evaluation is not a formal impact assessment.
the sustainability of the project?

11. What lessons and good practices can be identified with the implementation of the project?

3. Evaluation Methodology

3.1. Approach

The evaluation approach was largely qualitative and participatory in nature. Qualitative information was obtained through interviews. The evaluation approach was participatory because almost all stakeholders who had participated in the project—the intended beneficiaries—were interviewed to obtain their perspectives on the progress of the project. At the same time, participatory tools such as ranking were deployed during the evaluation to reinforce a sense of ownership among project participants.

The evaluation approach was also independent in terms of the membership of the evaluation team. Project staff and implementing partners only supplied the names of the targeted respondents and the evaluation team made its own scheduling and interview arrangements. Data collection methods and stakeholder perspectives were triangulated for as many as possible of the evaluation questions. The approach to the evaluation also integrated gender and maintained some flexibility, which allowed additional questions not originally included in the interview guide to be posed. In doing this, the evaluation team interviewed both men and women that have participated in the project at their convenience.

3.2 Data Collection Methodology

The midterm evaluation methodology was qualitative in nature and consisted of a document review and key informant interviews with stakeholders. The primary data collection tool utilized for the evaluation was an in-depth interview guide, which is included in the Annexes.

a) Document Review

As part of the evaluation, the Consultant reviewed several relevant project documents, including:

- CMEP document, including key annexes
- Technical Progress Reports and relevant annexes, including the Annex A: Data Reporting Form
- Pre-Situational Analysis (PSA) Report
- Original FOA from USDOL ILAB
- Verité’s technical proposal to USDOL
- Contextual project planning documents, including Gantt chart
- Data downloaded from the project’s online stakeholder tracking database
- Copies of key training and workshop agendas
- Training pre and post-test documents and scores

b) Interviews with stakeholders

(i) Selection of stakeholders for interviews
A stakeholder mapping document and discussions with the Verité project team showed that the project is engaging with at least 34 individual stakeholders from 21 organizations. The initial plan was to interview every stakeholder on the list supplied by Verité. However, the evaluation collected information from 31 individuals from 18 organizations, which constitutes a 91% response rate. The representatives from the three outstanding organizations were not available for interview at the time of the evaluation. Table 1 provides an overview of the stakeholders selected for interviews.

Table 1: Overview of stakeholders selected for interviews.

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Number of institutions</th>
<th>Number of institutions unavailable for interviews</th>
<th>Number of institutions available for interviews</th>
<th>Number of individuals interviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private Sector</td>
<td>2</td>
<td>0</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Civil Society/ Non-Governmental Organizations</td>
<td>6</td>
<td>2</td>
<td>4</td>
<td>10</td>
</tr>
<tr>
<td>Worker Organizations / Unions</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Employer Associations</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Government</td>
<td>11</td>
<td>1</td>
<td>10</td>
<td>17</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>21</strong></td>
<td><strong>3</strong></td>
<td><strong>18</strong></td>
<td><strong>31</strong></td>
</tr>
<tr>
<td>Donors</td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>Project team</td>
<td></td>
<td></td>
<td></td>
<td>5</td>
</tr>
<tr>
<td>US Embassy</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>28</strong></td>
<td><strong>3</strong></td>
<td><strong>17</strong></td>
<td><strong>41</strong></td>
</tr>
</tbody>
</table>

The stakeholders interviewed included representatives from: (i) government ministry officials who have been involved in or are knowledgeable about the project; (ii) private sector representatives with which the Forced Labor Indicators Project is collaborating; (iii) representatives of key employer associations and worker organizations or unions; (iv) international NGOs, civil society organizations and multilateral agencies with an interest in the project; (v) U.S. Embassy staff members; and (vi) other forced labor-related organizations and experts that the project has come into contact with.

Additional discussions were held with: Verité staff, including the Monitoring and Evaluation Officer, Research and Policy Department Program Director, Project Director, Project Associate, and Research and Policy Department Associate; four OCFT staff responsible for this evaluation; and a representative from the US Embassy. The interviews were usually held on a one-on-one basis with key informants or with multiple representatives from the same institution, as necessary.

(ii) Development of the interview guide

Following a review of the project’s indicators, project documents, and the evaluation questions, a
question matrix (see Annex 6) was initially prepared in collaboration with Verité. The matrix highlighted the evaluation questions and the potential sources of data to answer each question. Based on the question matrix, two types of interview guides were prepared: general and special guides. The general interview guide was meant to capture information from all potential stakeholders that were associated with the project. The special guides provided additional and tailored questions that were specifically targeted for each stakeholder group.

(iii) Data analysis

The key outputs from each interview were texts (field notes and interview transcripts) and audio recordings (in cases where these were permitted by the interviewee). All interviews were conducted in English. Given time constraints, a manual data processing approach was deployed using an adapted thematic framework analysis developed by Ritchie et al (2013). The data processing and analysis followed two broad steps: (i) familiarization of the qualitative data and (ii) application of a coding framework to organize data into categories, patterns, and themes (see Figure 2).

In analyzing the data, the audio files of the interviews were transcribed by three research assistants. Next, the evaluation team subjected transcribed interviews and field notes to separate rounds of close reading and subjected each audio file to active listening. The intention here was to enable familiarization of the responses, comments, and conversations shared by interview respondents on the evaluation questions. Such a close familiarization with, or immersion into the data collected has been recommended by researchers such as Creswell et al (2007).

Next, each of the three evaluation team members independently coded the same transcript and then met to compare and discuss preliminary key issues, themes, concepts, and patterns emerging from the responses (along with illustrative quotes). The key issues and themes identified by team members were then compared to detect patterns, which were recategorized and summarized into sub-themes as necessary. Themes were then compared again to each respondent’s transcript to determine consistency and/or divergence in their responses. In the final stage, the three team members reviewed the themes again and made connections within and between different themes. The themes developed up to this stage constituted the preliminary findings for each of the evaluation questions. Thematic analysis has been described as the most useful method for “capturing the complexities of meaning within a textual data set” (Clarke and Braun, 2013) and the evaluation team found it well suited to the analysis of the qualitative data collected.
c) Stakeholder convening

Following the field visits, a stakeholder meeting was organized by the project and led by the evaluators to bring together a wide range of stakeholders, including the implementing partners and other relevant parties. The meeting was used to present the major preliminary results and emerging issues, solicit recommendations, discuss project sustainability, and obtain clarification or additional information from stakeholders, including those not interviewed. A debrief call was also held among the evaluators, USDOL, and Verité after the stakeholder workshop to provide USDOL with preliminary results. The agenda for the stakeholder convening is included in the Annexes.

3.3 Ethical Considerations and Confidentiality

The evaluation mission observed utmost confidentiality related to sensitive information and feedback elicited during the individual and group interviews. To mitigate bias during the data collection process and ensure maximum freedom of expression of stakeholders, implementing partners and project staff were not present during interviews. Information obtained during the interviews was also aggregated to minimize the possibility of tracing comments to a particular stakeholder.

3.4 Limitations

This evaluation was not designed to be a formal impact assessment. Evaluation findings are based mainly on information collected from background documents and in-depth interviews with stakeholders, project staff, and project participants. While efforts were made to triangulate these responses to form our conclusions, the accuracy of the evaluation results relies on the integrity of the information provided to the evaluators from these sources. Also, a cost-efficiency analysis was
not included in this evaluation because it would have required impact data, which was not available.

4. Evaluation Findings

4.1 Perceptions of Relevance of the Forced Labor Indicator Project

“I have worked on this job for about a decade. This is the first time I have had an opportunity to talk and learn about the forced labor indicators. So, I will say the project is highly relevant.” (Stakeholder, Accra)

The quote at the beginning of this section typifies stakeholders’ perceptions around the relevance of the project. Information obtained from national stakeholders point to a consistent narrative that the project design is highly relevant for Ghana, and in the context in which it is operating. All stakeholders interviewed emphasized that the Forced Labor Indicators Project (FLIP) is very relevant to Ghana in many ways. For example, some stakeholders argued that signs and indicators (risks) of forced labor are generally widespread across several sectors but national dialogue on the issue is limited. The project’s design and approach have been relevant in generating such dialogues and conversations. Other stakeholders also highlighted the fact that designing the project to focus on knowledge and capacity building is highly relevant because there is little familiarity with the concept of forced labor and forced labor indicators among many stakeholders, despite Ghana’s ratification of ILO Convention 29 on forced labor and other protocols. Thus, the project is perceived as a relevant intervention to build capacity and create avenues for bringing forced labor indicators to the attention of the government to facilitate efficient and effective allocation of resources.

The evaluation found no major change at the national landscape that could potentially bring the project to a halt or disrupt the Theory of Change. However, there is political sensitivity around discussions of forced labor risks. As such, the evaluators recommend that communication and framing around the intervention—particularly with government officials and companies—should continue to clearly state objectives and provide stakeholders with full understanding of their role, contribution, and opportunities for their institution.

Information obtained during the data collection phase also largely confirms the Theory of Change to be valid and accurate. The project design assumed that government, private sector, and civil society organizations will be willing to participate in the project. In particular, the project also assumed that individuals would be made available by their supervisors to be able to participate in project activities. Data collected during interviews showed that stakeholders are willing to engage with or be informed about the project, thereby validating the assumptions of the project’s Theory of Change.

However, the built-in logic of the Theory of Change that improved knowledge of the forced labor indicators will almost automatically lead to modifications and/or incorporation of the knowledge into institutional systems and strategies such as protocols, operational manuals, and data collection tools was found to be quite simplistic. The evaluation found that incorporating knowledge or modifying existing plans, protocols, tools, and systems often requires more complex processes than
Two issues emerged from interviews that would have strengthened the project design and the Theory of Change, which can be considered in future project designs. First, some stakeholders were of the view that the project should have included a focus on establishing grievance mechanisms (or capacity building on how to set up effective grievance mechanisms), where identified cases or observations of indicators of forced labor could be reported for rescue action, redress, and remediation. Secondly—and emanating largely from stakeholders that are at the forefront of monitoring forced labor—was a suggestion that the capacity building component of the project should have gone beyond just knowledge to include financial and/or material support for logistics and tools, which would enable institutions to be more effective in operationalizing the knowledge offered by the project.

4.2 Project effectiveness

The project’s results framework served as the starting point for assessing the extent to which the project was on track to meet its targets and objectives. As highlighted in section 1, the expected outcomes of the project are:

- Improved understanding of indicators of forced labor, including indicators of labor trafficking
- Improved monitoring of working conditions by labor stakeholders to identify indicators and address incidents of forced labor and labor trafficking
- Strengthened capacity of the labor inspectorate to address forced labor and labor trafficking

However, at the time of the evaluation, activities related to the third outcome did not form a central part of the midterm evaluation. The project’s updated workplan (dated October 2019) highlights that the needs assessment related to the third outcome is expected to be completed by the end of 2019 while the first training was scheduled for April 2020. All other activities under the first two objectives which were in progress but not scheduled to be completed at the point of the evaluation (e.g. posting of resources online) equally did not form a central part of the midterm evaluation.

4.3 Progress on Improving Understanding of Indicators of Forced labor, Including Indicators of Labor Trafficking

“I think I took the concept for granted. What I mean is, I thought I knew what forced labor was. But my participation in the training taught me something different that deepened my knowledge. The project has really helped me as I have now become familiar with the indicators, which can help my work” (Stakeholder, Accra).
Table 2: Objective 1 targets versus actuals | Overview of progress on improving understanding of indicators of forced labor

<table>
<thead>
<tr>
<th>Key Indicators</th>
<th>LoP Target</th>
<th>MTE Finding</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of individual stakeholders with improved knowledge of forced labor indicators</td>
<td>20</td>
<td>19 (out of 27)³</td>
<td>Interviews with (individual) stakeholders</td>
</tr>
<tr>
<td>% of KII respondents who are conversant in forced labor indicators terminology</td>
<td>50%</td>
<td>70%⁴</td>
<td>Interviews with stakeholders</td>
</tr>
<tr>
<td>Final draft of strategy document completed</td>
<td>1</td>
<td>1</td>
<td>Document review, interview with project staff</td>
</tr>
<tr>
<td>Number of resources published</td>
<td>10</td>
<td>0*</td>
<td>Interview with project staff, Technical Progress Report</td>
</tr>
<tr>
<td>Number of individuals sensitized on forced labor and forced labor indicators</td>
<td>50</td>
<td>49</td>
<td>Interview with project staff, Technical Progress Report, and training attendance records</td>
</tr>
</tbody>
</table>

*Resources have been developed in draft form but not published yet. Planned publication period is within project timeline.

A key intervention logic is that if stakeholders are sensitized to the topic of forced labor indicators via training and meetings with Verité experts, then the stakeholders will have an improved understanding of forced labor indicators. Our assessment of progress to date further suggest that key milestones and targets set were being met by the FLIP project. Project documents reviewed suggest that a strategy document to engage stakeholders on how to identify and apply indicators of forced labor has been developed and completed by Verité. Project documents reviewed further suggest that eight different resources related to forced labor definitions and the forced labor indicators approach were being developed at the time of the midterm evaluation. Because tool development was still ongoing, the evaluation did not, however, review the content of these resources to assess their adequacy or otherwise. At the time of the evaluation, the resources were in draft form and not yet ready for technical stakeholder review and had not been shared with national stakeholders or posted online as planned. Project staff explained that the resources would be made available to relevant stakeholders once finalized. An updated workplan submitted by Verité to the US Department of Labor showed that the resources will be posted online by the end of December 2019. The document review showed that the number of individuals targeted to be

---

² Life of project target.
³ The evaluation team assessed 19 interview respondents as having either high or medium familiarity with the forced labor indicators. This differs from the project’s approach to calculating CMEP indicator OTC 1a, number of individual stakeholders with improved knowledge of forced labor indicators, which counts the number of trained participants demonstrating improvement between the training pre and posttest.
⁴ The evaluation found that 70% of interview respondents (19 out of 27) were determined to have either high or medium familiarity with the forced labor indicators, based on the criteria described below.
sensitized on forced labor indicators may have already been achieved, as the project has so far made sensitization contacts with about 70 individuals (against the target of 50). Contact times for sensitization for an individual, however, vary. The main avenues for these sensitizations have so far included participation in the series of trainings organized over the past year as well as participation in the Technical Working Group meetings.

Findings from the evaluation demonstrate improvement in stakeholder understanding of forced labor indicators including indicators of labor trafficking. Training and sensitization activities covered national and international legal frameworks around forced labor and stressed that forced labor consisted of two main components and about 21 indicators. As part of the evaluation, stakeholders were asked during interviews to provide their understanding of forced labor. The evaluation team’s understanding was that the project sought to build familiarity and understanding of the forced labor indicators approach. As a result, the evaluators prepared a checklist of the forced labor indicators and interviewees were asked about their understanding of forced labor and what indicators they may look out for in monitoring for forced labor. The evaluators then noted down terms as they arose spontaneously from respondents and cross checked these with the prepared checklist to get a sense of the level of familiarity of the indicators for each individual stakeholder. Not all participants had attended every training organized. Four points can be stressed here:

First, stakeholders acknowledged that forced labor can be discussed in terms of its components as well as through indicators. However, just about 4 out of the 27 individuals who responded to this question mentioned the two primary components in their explanations: involuntary work and threat of penalty. Seventeen respondents mentioned only involuntary work while two additional respondents referred only to threat of penalty. Four respondents made no reference to any of the two components of forced labor. There were narratives from several stakeholders that their understanding of these components and the related indicators could be attributed to their association or participation in the training and sensitization activities of the FLIP project. Several stakeholders argued that because they initially had little familiarity about the concept, their ability to even cite one example should be construed to mean progress or improved knowledge.

Second, stakeholders demonstrated varying levels of familiarity and knowledge around forced labor indicators (see Figure 3). However, more respondents demonstrated ‘high’ familiarity with forced labor indicators. Applying the same criteria used during the Pre-Situational Analysis, 14 out of the 27 respondents who shared some forced labor indicators demonstrated ‘high’ familiarity (mentioned more than 3 indicators); 7 stakeholders showed ‘low’ familiarity (mentioned none or 1 indicator); and 5 showed ‘medium’ familiarity (mentioned 2-3 indicators). In the Pre-Situational Analysis, the highest number of stakeholders showed ‘low’ familiarity with the forced labor indicators. In contrast, findings from the evaluation show that stakeholders are improving in their knowledge and understanding of forced labor indicators. With 70 percent of the individual stakeholders interviewed showing medium or high familiarity with forced labor indicators, the project is on track to meet its target of having at least 50 percent of respondents showing familiarity with forced labor indicators terminology.
Third, some indicators were mentioned more than others, suggesting the need to stress or increase awareness of the less frequently mentioned indicators in future training. For example, the top three most frequently cited indicators were ‘work in hazardous conditions to which the worker has not consented,’ ‘with or without compensation or protective equipment’ (14 references), ‘work with very low or no wages’ (12 references), and ‘deceptive recruitment’ (13 references). Some stakeholders also mentioned “debt bondage” and “bonded labor,” “work with no or low wages,” “abusive requirement for overtime,” and “withholding of wages or other promised financial penalties,” as some of the indicators. Indicators such as exclusion from future employment or overtime, imposition of worse or further deterioration of working conditions, isolation, constant surveillance, and locked in workplace or living quarters received no mention at all (see Figure 4.).

---

5 These findings reflect indicators from both the 2018 ICLS guidance document, *Guidelines concerning the measurement of forced labor*, and the 2012 *Hard to see, harder to count* guidelines.
4.4 Progress on Improving Monitoring of Working Conditions by Labor Stakeholders to Identify Indicators and Address Incidents of Forced Labor and Labor Trafficking

“As a result of the project, we are in discussions as [an institution] and we are discussing how the forced labor indicators will fit into the broader indicators that we use in the field. The questionnaire for taking data from the field is still under review, and we hope to include indicators on forced labor” (Stakeholder, Accra).
Table 3: Objective 2 targets vs actuals | Overview of progress improving monitoring of working conditions by labor stakeholders to identify forced labor indicators

<table>
<thead>
<tr>
<th>Indicator</th>
<th>LoP Target</th>
<th>MTE Finding</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of participating institutions using improved labor monitoring systems</td>
<td>5</td>
<td></td>
<td>Interviews with stakeholders, Technical Progress Report (2019)</td>
</tr>
<tr>
<td>Number of institutions participating in consultation process</td>
<td>8</td>
<td>23(^6)</td>
<td>Interviews with stakeholders, Technical Progress Report (2019)</td>
</tr>
<tr>
<td>Number of institutions with a documented strategy for adopting a forced labor indicators approach(^7)</td>
<td>4</td>
<td>3</td>
<td>Interviews with stakeholders, Technical Progress Report (2019)</td>
</tr>
<tr>
<td>Stakeholders have labor monitoring systems that align with forced labor indicators approach(^8)</td>
<td>4</td>
<td>In progress</td>
<td>Interviews with stakeholders</td>
</tr>
</tbody>
</table>

The key targets and milestones set by the project to track the outcome on ‘improved monitoring of working conditions by labor stakeholders to identify indicators and address incidents of forced labor and labor trafficking’ are: (i) having at least 8 institutions participating in the consultation process; (ii) 4 institutions documenting a strategy for adopting a forced labor indicators approach; and (iii) 4 stakeholders have labor monitoring systems that align with forced labor indicators approach.

The evaluation found that the project appears to be on track toward Outcome 2, though eventual realization of the objective will depend on other processes. At the time of the midterm evaluation, more than 8 stakeholders were involved and participating at varying degrees in the project’s consultative processes. Also, representatives from three institutions (out of the expected 4 by the end of the project) mentioned ongoing plans and strategies for integrating forced labor indicators into their labor monitoring and operational systems. Although this is a relatively small number of stakeholders when compared to the number involved with the project, it is in line with project

\(^6\) The evaluation team used a broad definition of “consultation,” counting all institutions participating in the project. This is based on the understanding that every stakeholder involved with the project is participating in some sort of consultative process, whereby through their engagement and participation in technical support activities, the project would help them identify opportunities and challenges for integrating forced labor indicators into existing labor monitoring systems. The FLIP CMEP uses a narrower definition, considering “consultation” as action-oriented conversation between institutions and Verité project staff that begins the planning process, including engagement and technical support activities to help institutions identify opportunities and challenges for integrating forced labor indicators into existing labor monitoring systems.

\(^7\) This wording differs slightly from the FLIP CMEP indicator OTP 2.2, which tracks the number of institutions with a draft action plan for adopting a forced labor indicators approach.

\(^8\) This wording differs slightly from the FLIP CMEP indicator OTP 2.3, which counts the number of labor monitoring systems that align with a forced labor indicators approach.
targets. Also, stakeholders’ draft action plans are still under review and it is unclear whether elements of forced labor indicators will eventually be integrated in the final document for their respective departments or organizations. The rapport built by the project team has been a key success factor, which has enabled the team to work with national stakeholders to introduce forced labor indicators into existing operational plans and manuals.

4.5 Stakeholder Participation

The stakeholders involved with the project can be grouped according to different categories: by sector and by commodity. From a sectorial point of view, government, civil society organizations, private sector, and other employers can be distinguished. From a commodity or supply chain point of view, cocoa, gold, and oil palm stakeholders can be distinguished.

Findings from the evaluation show that the project has been effective in bringing a wide range of stakeholders together to generate discussions on forced labor indicators. However, participation of the various stakeholders, their degree of commitment to project execution, and their contribution towards the project’s objectives have not been the same. Participation of various stakeholders has ranged from one-time interaction to sporadic/occasional interaction to closely engaged stakeholders by virtue of their participation in platforms such as the TWG. The evaluation categorized stakeholder participation into three levels as follows: low, medium and high (see Table 4).

Table 4: Criteria for stakeholder participation levels

<table>
<thead>
<tr>
<th>Participation Level</th>
<th>Description</th>
<th># of Institutions(^9)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>These stakeholders have not actively been involved in the implementation of project activities. Though they may have some information about the project, they know very little about what the project seeks to achieve, have little interaction with the project, and mostly have had no more than two engagements or contacts with the project.</td>
<td>8 (3 governmental, 3 civil society, and 2 private sector institutions)</td>
</tr>
<tr>
<td>Medium</td>
<td>These stakeholders have directly participated in the project; they have attended at least two project related activities or engagements but still feel distant as they have little information on the project’s progress, their role, and what is required of them in relation to the project. This group received regular information from the Ghana project office as and when it was required.</td>
<td>3 (1 governmental and 2 civil society institutions)</td>
</tr>
<tr>
<td>High</td>
<td>These stakeholders have directly participated in almost all project activities; they were able to articulate what the project seeks to achieve and were in contact with the Ghana office on a regular basis. They attended at least four meetings</td>
<td>11 (6 governmental and 5 civil society institutions)</td>
</tr>
</tbody>
</table>

\(^9\) Distinct units or departments within institutions are counted separately.
and received regular updates from the Ghana project office.

4.6 Stakeholder Commitment to Project Execution and Contribution to the Project’s Objectives

For many stakeholders, there is an understanding that the main contributions required of them are their participation in training activities and applying that learning to their jobs. For some institutions, the project is looking at opportunities for higher participation. The strategy is to tailor different activities and engagements to different groups. Almost all stakeholders interviewed showed positive signs of committing time and resources to these activities to ensure the project succeeds. However, a few stakeholders raised concerns that monetary assistance to operationalize or undertake field monitoring would have added value and further motivated them to support the project’s execution. Given that this is not the focus of the FLIP project, the project team needs to constantly reinforce the capacity building aim of the project in subsequent communications with the stakeholders.

4.7 Challenges and Barriers Facing Project Implementation

“The challenge is sometimes our programs clash. As a Technical [Working] Group member, I know I should always attend the meetings. It is not good to be sending representatives” (Government stakeholder, Accra).

Generally, a dozen of stakeholders argued that they do not experience any challenge or barriers as far as their participation in the project were concerned. However, the following issues emerged as challenges and barriers that affect the project’s implementation. The stakeholder convening workshop further confirmed these findings.

- Some targeted stakeholders are unable to attend meetings, trainings, and other engagements due to time constraints. As the quote above illustrates, project activities often clash with some stakeholders’ schedules, which constrains their participation in all meetings. Although they often send representatives, their absence means that capacity building objectives may not be achieved. This comment was widespread across stakeholders.

- Introducing new concepts into existing institutional and labor monitoring systems requires long, multi-stakeholder processes, which will constrain the integration of forced labor indicators into the labor monitoring systems of some institutions within the life of the project. This has limited the efforts of some stakeholders to transfer knowledge into building labor monitoring systems. This aligns with the project’s logic in setting relatively low targets for the number of modified labor monitoring systems.

- At least a quarter of the stakeholders interviewed expressed limited knowledge about the project’s purpose and progress. The dominant reasons provided was that Verité has not sufficiently engaged them since the early consultations it conducted with them, nor have they had an opportunity to participate in any of the trainings.
• At least 22 percent of the stakeholders interviewed perceived and expressed fears that openly talking about forced labor and incorporating indicators in labor monitoring systems without accompanying resources to monitor and reduce its prevalence may damage Ghana’s reputation in the long term. This potentially raises the need for future programming that is more specifically focused on prevention.

4.8. Sustainability and the Technical Working Group

The heart of the project’s sustainability strategy is the fact that the project is focusing on introducing or modifying existing labor monitoring systems rather creating new, resource-heavy, uncoordinated systems that fail to leverage existing efforts. Existing systems already have stakeholder support and their own funding streams and staffing plans, which will contribute to overall project sustainability.

Findings from the evaluation suggest positive signs and important progress on sustainability. There is a strong perception among all stakeholders that outcomes and gains achieved by the project could be sustained and owned. For several stakeholders, improved knowledge and efforts by the project to ensure incorporation of forced labor indicators into labor monitoring systems are themselves acts of sustainability.

As part of the evaluation, stakeholders were asked to indicate their commitment to continue participating in project activities. All interviewed stakeholders—including those assessed to have low participation—intend to continue their involvement in project activities. Generally, stakeholders involved in the project have a good working relationship with Verité: at least 81 percent of stakeholders interviewed openly expressed high satisfaction with the interaction and hope to continue working with the project. Even stakeholders with low participation indicated they want to increase their involvement. Stakeholders who had not yet actively participated in project activities perceived value in improving their understanding of forced labor indicators to enable them educate others. Further insights from the stakeholder convening reinforced the conclusion that stakeholders are committed to continue with the project’s objectives beyond the project’s life.

Almost all stakeholders are prepared to continue to build capacity and improve forced labor monitoring systems after the FLIP project has ended, because they work with standards and international best practices and forced labor is one of the basic concerns. In the gold mining sector, for example, producers must address forced labor to receive international certification. Addressing forced labor in the gold sector presents challenges, including the costs mines incur in trying to meet these standards. They are encouraged to comply by citing the benefits that come from operating responsibly or doing away with forced labor and child labor issues at their site. For example, the evaluation found that one institution was prepared to continue working toward improved forced labor monitoring even after the project has ended as the mining sector would continue to use the indicators to improve their CRAFT Code and in capacity building for mine workers, which would ensure sustainability of the project outputs. Other stakeholders—especially in the cocoa sector where child labor is a topical issue related to forced labor—are prepared to continue pursuing the objective of improving forced labor monitoring. Stakeholders are willing to work with others to
ensure a conducive labor market devoid of illegal activities, including forced labor, which provides opportunities for people to operate freely.

The project recognizes that buy-in and a sense of ownership from stakeholder institutions is critical to sustained integration of forced labor indicators into monitoring systems. As such, the project has set up a Technical Working Group (TWG) to bring many stakeholders together to promote sustainability. The TWG convenes technical and senior officers from government, employer and employee organizations, non-governmental organizations, and civil society to support implementation of the project. Institutions participating in the TWG include 9 government institutions (including multiple units/branches from the same Ministry) and 7 from civil society, employer, and employee organizations.

Conversations with TWG members show that they have been active in raising awareness about forced labor and forced labor indicators in their lines of work. While stakeholders highlighted the importance and value added by the TWG, two key issues emerged on ways the group can be strengthened to enhance sustainability. Although stakeholders recognized their roles as advisory, all of them pointed out that they did not receive a written TOR, which made some members appear unclear about their roles. Perhaps a written TOR may need to be provided to each of the TWG members regarding their exact roles and responsibilities. Second, all stakeholders requested more frequent communication between meetings to keep them fully updated about the progress of the project. To continue to build momentum for sustainability, regular interaction and check-ins would be required from Verité. Another challenge of being a TWG member is time constraints, as busy schedules make it difficult for some members to attend all meetings.

Additionally, stakeholder interviews revealed some uncertainties about the future of the TWG. It is unclear whether the TWG would be integrated into existing structures, such as the National Steering Committee on Child Labor, or whether it will evolve into an independent body. It is also unclear which ministry will host it and organize the convenings when Verité is no longer facilitating the process, and whether membership will continue to be active once the project ends. These are all questions requiring broader reflection on the sustainability of the project. Project staff, however, clarified that there have been unofficial conversations about the future of TWG, with a possibility that it could be linked to the National Steering Committee on Child Labor.

Further views from the interviews point out that Verité’s activities to ensure the project’s sustainability need to consider technical and political buy-in for the project. That is, the project appears to have concentrated mostly on the former and there are suggestions to increase political buy-in as well. This will require leveraging the stakeholder engagement plan and working with technical actors to gain access to relevant ministers, parliamentarians, and other political heads.

5. Good Practices and Lessons Learned
The evaluators defined ‘good practices’ as actions and practices undertaken in the course of the project implementation that have worked well for the achievement of the project’s objectives so far. Similarly, ‘lessons’ are understood as the learnings gained from project implementation. Lessons reflect both positive and negative experiences of the project, which can inform the design and
implementation of future projects. The following are some of the identified good practices and lessons that can enhance the effectiveness of future projects. These lessons and practices were identified from the analysis of the interviews and the stakeholder convening meeting.

**Good Practices**

1. **Training/sensitization:** The training and sensitization activities have largely been successful in building knowledge. Interviews suggested that the training approach was participatory and utilized specific issues and cases from the Ghanaian contexts, which enabled understanding.

2. **Broadened consultation:** Project implementers engaged a wide range of stakeholders whose mandates, roles, and responsibilities include direct and distant monitoring, awareness-raising, reporting, or minimizing labor violation issues in Ghana. This practice has made it possible for the project to target almost all relevant actors who really need capacity building on forced labor indicators—which is the ultimate objective of the project.

3. **Maintaining positive relationships and interactions with key and ‘relevant’ stakeholders:** Beyond the broad consultation, Verité also pursued a practice of maintaining positive relationships and interactions with key stakeholders, including frequent bilateral conversations with the Project Director via phone, text, and in-person updates. Based on this approach, key stakeholders participated in the design of the monitoring and evaluation plan, piloting of the field survey, and sharing of some project information with other key stakeholders.

4. **Aligning project activities to existing protocols, tasks, and activities of key stakeholders:** Another good practice of the project was that it aligned its objectives with existing protocols and activities of key stakeholders, rather than reinventing the wheel. This improved targeted stakeholders’ acceptance of, support for, and willingness to participate in the project.

5. **Formation of the Technical Working Group (TWG):** The formation of the Technical Working Group has been a useful practice as far as the project is concerned. Membership is comprised of different institutions who bring diverse knowledge, experiences, and ideas to shape the direction and implementation of the project. Additionally, the TWG serves as an important platform for enhancing sustainability of the outcomes and gains within and beyond the lifespan of the project.

6. **Circulation of a newsletter and project updates to a wider group:** Stakeholders have been highly impressed about Verité’s initiation of a newsletter to provide project updates to a wider group of stakeholders. This practice needs to be continued.

Based on these practices, the project has been effective in bringing a wide range of stakeholders together to generate discussions on forced labor indicators. The project’s interactions were with the right technical actors at the national level, although there is a need to consider engagement with political heads as well to further expand knowledge and institutionalize forced labor into the country’s labor monitoring systems.
Lessons

1. Working to obtain acceptance and buy-in from national level project stakeholders can often be time consuming and challenging. However, the project approach demonstrates that broadening and maintaining healthy relationships with such key stakeholders creates space for acceptance and participation of those stakeholders who have a mandate on forced labor and trafficking issues in Ghana. The rapport built by the project team has been a key success factor, which enabled the team to work with national stakeholders to begin plans to introduce forced labor indicators into existing operational plans and manuals of stakeholders.

2. A project approach that builds on existing knowledge, capacity, and structures can provide a springboard for success. The project made important progress in increasing the capacity of targeted stakeholders because the implementation approach seeks to build on existing knowledge, capacity, and structures (including indicators, manuals, protocols, etc.) that are aligned with the principal activities of these key stakeholders across sectoral and national contexts.

3. Another lesson from the project has been its ability to simultaneously engage actors across policy, technical, and operational levels. This helps to mainstream forced labor issues across all the key institutions and areas.

4. Effective project design can lead to increased acceptance, support, and progress. A consistent narrative gathered from targeted stakeholders was that they were willing to learn more about the forced labor indicators and how they intersect with their work—an area that has received little attention so far in their lines of work. Thus, it is a telling example of how the very design of a project and what it promises to achieve can promote its acceptance and participation among local actors.

6. Recommendations
Based on the midterm evaluation findings presented, the following recommendations have been made to move the project forward by Verité and implementing partners.

Recommendation 1: Improve communication about the project among stakeholders

Though the Ghana project staff conducts regular outreach with some stakeholders via in-person meetings and phone calls, a couple of stakeholders (at least 22 percent of stakeholders interviewed) expressed concern that they receive little information about the project and its progress, especially in between meetings. As such, the evaluation recommends improving communication about the project and spreading it out among the various stakeholders. Some strategies for improving communication include, but are not limited to:

- Providing regular updates to all stakeholders through monthly newsletters (between meetings/engagements), as it has already started.
- Sharing key updates or meeting reports with all stakeholders and TWG members.
- Disseminating website links (if available) or news items on updated information.
Using the stakeholder engagement strategy (as presented in the Pre-Situational Analysis) to tailor the project’s communication approach with different stakeholders. Engage, share new knowledge, collaborate, and make joint decisions with the primary stakeholders (usually those with direct responsibility in formulating policies, operational guidelines, and direct monitoring and reporting of labor violations) who need to be closely engaged to achieve the project’s objectives. Secondary and tertiary stakeholders with interest in the project may only be periodically informed about progress and other project updates.

**Recommendation 2: Improve actions to obtain buy-in from both technical and political actors**

To consolidate gains and progress on sustainability, it is recommended that Verité leverage its excellent relationship with technical actors to also improve political buy-in of the project. This would mean sharing information and building relationships with the leadership of the relevant government ministries. Some specific actions to consider include:

- Working with the technical staff involved with the project to schedule appointments with relevant ministers not engaged so far to introduce the project to them.
- Working with the identified technical staff to create project files at the relevant ministries, which can be used to inform the ministers about the project.
- Requesting approval to send regular newsletter updates to the relevant ministries.

**Recommendation 3: Design a post-training plan and follow up on training participants to offer further knowledge-building support where necessary**

In order to deepen knowledge and spread common understanding on forced labor across institutions, it is further recommended for Verité to design a post-training follow up plan to—among other things—offer further technical support to enable participants to operationalize the concepts in their line of work. This will ensure that training participants pass on knowledge to their colleagues.

Moreover, Verité can also request to lead short presentations and/or sensitization activities on forced labor at the premises of the various stakeholder organizations with the aim of targeting other individuals (i.e. management and workers) not participating in trainings and other sensitization activities. This can be done during staff meetings and other internal meetings. As part of this strategy, stakeholders who have participated in FLIP trainings could be given an opportunity to share their experiences with colleagues. In addition, targeted stakeholders who may miss training activities may be offered an opportunity to join the next available training schedule. Training participants can also be asked to commit to a self-developed action plan which expects them to train others or ensure that their colleagues also become aware of forced labor indicators.

**Recommendation 4: Engage and improve capacity building actions for stakeholders and other actors in the private sector**

Despite their awareness about the project and expressed interest in building capacities around forced labor indicators, core members of some of the private sector institutions were unable to
attend the first training initiative due to time constraints. They sent others on their behalf to attend meetings. Verité should therefore engage and improve capacity building actions for private sector actors and other stakeholders so that the ultimate objective of the project can be achieved.

**Recommendation 5: Strengthen the Technical Working Group**

Strengthen the Technical Working Group by clearly articulating their roles and expected contributions to the project, improving engagement with the members in between meetings, providing very advanced notice for meeting days, and possibly establishing sub-groups within the TWG to handle specific tasks or targets.

**Recommendation 6: Continue to ensure clear communication and framing around the core objective of the project**

The evaluation found out that many stakeholders’ expectations go beyond the scope of the project. Many stakeholders with direct responsibility for monitoring felt that while knowledge building is essential, resourcing the outfits (largely monetary and logistics) would further enhance their work. Indeed, some stakeholders expressed expectations around receiving funding and other resources. The project will therefore need to re-emphasize the core objective of the project. Other stakeholders expected Verité to provide financial and technical assistance to government to set up grievance mechanisms.

Additionally, there is political sensitivity around discussions of forced labor risks. As such, we recommend that the communication and framing around the intervention continue to clearly state objectives and provide stakeholders with a full understanding of their role, contribution, and opportunities for their institution. In particular, Verité and the project team will need to maintain consistency in framing the project as *not* about monitoring forced labor per se, but for improving the knowledge and capacity of national and local actors to understand the risks, signs, and indicators for identifying forced labor and labor trafficking.

**Recommendation 7: Maximize gains by broadening engagement with ‘high relevancy’ stakeholders**

Quite a few of the high relevancy stakeholders identified during the Pre-Situational Analysis are not actively involved in the project. An example is the Ghana Cocoa Board (COCOBOD). To achieve the ultimate aim of the project, Verité may consider broadening the stakeholders engaged. Other critical actors that the project may consider for involvement in the future are the National Development Planning Commission (which issues guidelines to all local authorities in the preparation of development plans) and the Ghana Statistical Service (which undertakes nationally representative surveys on labor and employment conditions).

**7. Conclusions**

This report has provided key findings from the midterm evaluation of the Forced Labor Indicators Project in Ghana. As the report highlights, there are clear and positive signs that the project is
largely on track to meet its set targets and objectives. Evaluation findings suggest that the project’s activities and targets achieved to date are improving stakeholders’ understanding of indicators of forced labor, including indicators of labor trafficking. Also, some institutions across the government and private sector have begun plans to incorporate forced labor indicators into their respective organization’s labor monitoring systems. Stakeholders have also pointed out that the project design is highly relevant for Ghana, and in the context in which it is operating.

However, there are also few challenges and areas that the project needs to improve. Time constraints for attending trainings, meetings, and other engagements present a major challenge, which makes some targeted stakeholders unable to attend meetings. Other challenges and barriers relate to the fact that incorporating knowledge on forced labor into organizational systems and procedures often requires a substantial investment in time and resources.

There is a strong perception that outcomes and gains achieved by the project could be sustained and owned. However, Verité’s activities to ensure the project’s sustainability need to consider both technical and political buy-in.

The report has also shown that the project has been effective in bringing a wide range of stakeholders together to generate discussions on forced labor indicators. The project’s approach has been participatory and interacting with the right technical actors at the national level, although there is a need to consider engagement with political heads as well to further expand knowledge and institutionalize forced labor into country labor monitoring systems.

The recommendations described in this report can be considered to address these gaps to achieve the ultimate goal of the project.
References


Annexes

Annex 1: List of Documents Reviewed

a. Complete CMEP document, including key annexes
b. Technical Progress Reports and relevant annexes, including the Annex A: Data Reporting Form
c. Pre-Situational Analysis (PSA) Report
d. Original FOA from USDOL ILAB
e. Verité’s technical proposal to USDOL
f. Contextual project planning documents, including Gantt chart
g. Data downloaded from the project’s online stakeholder tracking database
h. Copies of key training and workshop agendas
i. Training pre and posttest documents and scores
Annex 2: Stakeholder Convening Agenda

Meeting held on 22nd Nov. 2019 at the AH Hotel, Accra

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>9:00 am</td>
<td>Arrival and registration</td>
<td>Verité Team</td>
</tr>
<tr>
<td>9:30 am</td>
<td>Welcome and introductions</td>
<td>Verité &amp; Evaluation Team</td>
</tr>
<tr>
<td></td>
<td>• Welcome remarks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Purpose of Meeting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Review agenda and objectives for the workshop, and setting norms</td>
<td></td>
</tr>
<tr>
<td>10:00 am</td>
<td>Presentation of the Evaluation Approach</td>
<td>Evaluation Team</td>
</tr>
<tr>
<td>10:10 am</td>
<td>Presentation of Preliminary Findings</td>
<td>Evaluation Team</td>
</tr>
<tr>
<td>10:30 am</td>
<td>Feedback, Questions and Contributions from stakeholders</td>
<td>Evaluation Team</td>
</tr>
<tr>
<td>11:00 am</td>
<td>Break</td>
<td>All</td>
</tr>
<tr>
<td>11:10 am</td>
<td><strong>Group Activity: Project’s success, challenges and sustainability:</strong></td>
<td>Evaluation Team</td>
</tr>
<tr>
<td>11:45 am</td>
<td><strong>Plenary Session</strong>: Group presentations and discussion on project’s performance to improve implementation and ensure sustainability.</td>
<td>Evaluation Team</td>
</tr>
<tr>
<td>12:15 pm</td>
<td><strong>Individual Activity</strong>: Feedback from participants to nominate “action priorities” for the remainder of the project.</td>
<td>Evaluation Team</td>
</tr>
<tr>
<td>12:50 pm</td>
<td><strong>Wrap up and Closing</strong></td>
<td>Verité Team</td>
</tr>
<tr>
<td>1:00 pm</td>
<td>Lunch</td>
<td>All</td>
</tr>
</tbody>
</table>
Annex 3: Interview Guide

Preamble:

- **Evaluators briefly introduce themselves:** Dr Albert Arhin; Dr Olivia Agbenyega; and Mr. Kwaku Obeng-Okrah.
- **Thank participants for their time and participation. Inform that participation is voluntary.**
- **Briefly introduce the FLIP Project**
  - With funding from the Bureau of International Labor Affairs (ILAB) of the United States Department of Labor (USDOL), Verité, an international labor rights NGO, is working to improve monitoring for forced labor. The project is led by Ms. Josephine Dadzie from Accra. More specifically, the project is working to support stakeholder understanding of forced labor and forced labor indicators, integrate forced labor into labor monitoring systems and strengthen the capacity of the labor inspectorate to identify and address forced labor. In addition to work directly with partner institutions, the project has conducted trainings and is hosting a Technical Working Group on forced labor which is meeting regularly.
- **Briefly introduce the midterm evaluation:**
  - The evaluation will provide DOL, Verité, and other project stakeholders with an assessment of the project’s performance, its effects on project participants, and an understanding of the factors driving the project results. These learnings will help Verité ensure that the project is meeting stakeholder needs around forced labor and forced labor monitoring and will inform any necessary adjustments as well as potential future work needed.
- Thank them again for their participation and provide contact information should they have follow-up questions.

**Name of Organization:**

**Name/Designation of Interviewee:**

Is interviewee a member of Technical Working Group? Ask additional questions on TWG

**Section A: Relevance**

1. Can you briefly tell me about your organization/firm/institution?

2. How has your institution participated in the project so far? How have you personally participated in the project so far (if different)?
3. Do you think the project (improving monitoring for forced labor) is relevant in Ghana? (Yes/No) Please give a reason for your response.

4. What is the relevance of identifying and addressing Forced Labor in your (line of) work?

5. Can you briefly review how your institution monitors for labor issues?

6. If you have never participated in any of the project’s activities could you share with us the reasons for this situation? (For example: I don’t have time to attend meetings/trainings, I haven’t been invited, someone else from my org attends, I/my org doesn’t see this project as relevant to our work, etc.)

7. If given the opportunity would you want to participate in any of the project’s activities (again)? Please give a reason for your answer.

Section B1: Effectiveness

8. Does your institution include forced labor in its monitoring? Has this been impacted by participation in project activities? If yes, how?

9. If it does not currently monitor for forced labor, does it have a plan for incorporating forced labor? Has this been impacted by participation in project activities? If yes, how?

10. What are some of the other results that have come from your participation in the project activities?
   a. In your opinion, what are the factors that most accounted for these results?

11. What have been some of the challenges in participating in the project?
   a. What may have accounted for these challenges?

12. What is your organization’s/institutions overall level of participation in the project (low, medium, high, unable to determine)? Give a reason for your answer.

13. How satisfied have you/your colleagues been with project activities thus far? Why?

14. From your perspective, is the project on track to improve forced labor monitoring in Ghana? Why or why not?

Section B2: Knowledge Building Effectiveness

15. Did you participate in any project activities meant to build knowledge about forced labor? How many times did you participate in these activities? Was this sufficient to build your capacity?
16. How would you define forced labor?

17. Can you describe the forced labor indicators approach?10

18. Would you say your understanding on forced labor (AND indicators of forced labor) has improved because of your participation in the project?

19. To what extent have you incorporated this knowledge into your work in general?

20. Please can you give examples of how you have utilized ‘new skills and knowledge’ from participating in any project activities to monitor working conditions and incidents of forced labor and labor trafficking in your work?

21. Have you raised awareness about forced labor/forced labor indicators for your colleagues after your participation in any project activities?

Section C: Sustainability

22. Are you aware of any project outcomes or impacts (including those outside of your own organization?)? Can you share with me?

23. Are the project outcomes and sub-outcomes (achieved so far) sustainable at the local and/or national level? Please describe further.

24. Is your institution prepared to continue pursuing the objectives of the project (improving forced labor monitoring) after completion of the project? Why/why not?
   a. If yes, what are some activities related to forced labor/forced labor monitoring your institution would continue to implement after the close of the project?
   b. What barriers to implementing these activities does your organization face?
   c. How can the project help support these activities or overcome potential barriers?

25. In your opinion, are other stakeholders (outside of your institution) prepared to continue pursuing the objectives of the project (improving forced labor monitoring)? Why/why not?
   a. From your perspective, what barriers to implementing these activities does your organization face?
   b. How can the project help support these activities or overcome potential barriers?

26. In what ways is the project already supporting longer term sustainability of the project’s outcomes?

10 Note: Responses will be checked against FL definitions and indicators list to create proxy score of respondent knowledge.
27. From your perspective, what other actions could the project take to promote sustainability and long-term buy in/ownership from Ghanaian stakeholders? (If this involves other stakeholders, please specify)?

28. In what way(s) can your organization support activities to create more awareness on the relevance of the project amongst different stakeholders?

Section D: Lessons

29. From your perspective, have you been satisfied with the relationship Verité has developed with your institution? Why or why not?
   a. What steps could Verité take to further develop or improve the relationship with your institution?

30. What lessons and good practices can be identified with the implementation of the project?

31. Are there any unintended outcomes (positive and negative) associated with the implementation of the project that you wish to share?

32. Do you have any other recommendations for improving the design and implementation of similar projects?

Additional Questions for Technical Working Group Members

1. As a TWG member, what is your understanding of your mandate/role in the implementation of the project?
2. Would you say the TWG has carried out its role in accordance with your expectations?
3. What one thing would you say to be the most successful achievement of the TWG so far?
4. What have been some of the challenges faced by the Technical Working Group in performing its role(s).
5. How can the Technical Working Group best support achievement of the project outcomes?
### Annex 4: Question Matrix

<table>
<thead>
<tr>
<th>Evaluation Question</th>
<th>Data source(s)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Relevance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. How relevant is the project’s design in light of the present context in which it operates?</td>
<td>- Project documents</td>
<td></td>
</tr>
<tr>
<td>b. How relevant is the project’s Theory of Change in light of the present context in which it operates?</td>
<td>- Project documents - Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>c. Does the available qualitative information confirm the Theory of Change to be valid and accurate?</td>
<td>- Interviews with stakeholders - Technical progress report</td>
<td></td>
</tr>
<tr>
<td>d. Does the available quantitative information confirm the Theory of Change to be valid and accurate?</td>
<td>- Project documents (e.g. baseline and endline survey report, if available) - Technical progress report - CMEP</td>
<td></td>
</tr>
<tr>
<td>e. Have any changes to the national landscape impacted the critical assumptions articulated in the Theory of Change? If so, does the project have a strategy for adaptation</td>
<td>- Desk review/policy analysis - Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td><strong>Effectiveness</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. At the midpoint of the project, is the project on track to meet its targets/objects (as outlined in project documents)?</td>
<td>- Project document - Technical progress and status report - Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>b. What are the factors driving results (or progress)?</td>
<td>- Project document - Technical progress and status report - Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>c. What are the factors hindering results so far?</td>
<td>- Project document - Technical progress and status report - Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>d. What are the current challenges that the project is facing in its implementation?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>e. What efforts have been made to overcome these challenges?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Methodology</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>f. What is the level of participation of the various stakeholders?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>g. What is the degree of commitment to project execution?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>h. What is the level of stakeholders' contribution towards the project's objectives?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>i. What are the barriers to project implementation (from national context)?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>j. What are the barriers facing the implementation of the project (institutional/workstream context)?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>k. How is the project approaching tool development across the three sectors? Are there any good practices or lessons learned?</td>
<td>- Interviews with stakeholders - Technical progress and status report</td>
<td></td>
</tr>
<tr>
<td>l. How can the Technical Working Group best support achievement of project outcomes?</td>
<td>- Key informant interviews with Technical Working Group - Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>m. How can the online learning platform best support the needs of Ghanaian stakeholders?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td><strong>Sustainability</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. Are the project outcomes and sub-outcomes (achieved so far) sustainable at the local and/or national level?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>b. Do national and local partners perceive project activities to be useful?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>c. Do national and local partners prepared to take ownership?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>d. What specific actions should USDOL take to promote the sustainability of the project</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>e. What specific actions should Verité, take to promote the sustainability of the project</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>f. What specific actions should other project stakeholders take to promote the sustainability of the project</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Lessons</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. What lessons and good practices can be identified with the implementation of the project?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
<tr>
<td>b. What are the unintended outcomes (positive and negative) associated with the implementation of the project?</td>
<td>- Interviews with stakeholders</td>
<td></td>
</tr>
</tbody>
</table>