EVALUATION OF COUNTER TRAFFICKING: PREVENTION AND CAPACITY BUILDING ACTIVITIES IN KOSOVO (SERBIA AND MONTENEGRO) AND F.Y.R. of MACEDONIA

Evaluation Report (final)

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BIOTA BD OY
Foreword

Biota BD Oy has been entrusted by the Finnish Ministry for Foreign Affairs to conduct the evaluation of the project Counter Trafficking: Prevention and Capacity Building in Kosovo (Serbia and Montenegro) and F.Y.R. Macedonia implemented by the International Organisation for Migration (IOM). The evaluation team consisted of Ms Päivi Äijälä as team leader and Ms Venla Roth as member. The team was supported by Ms Kristiina Mikkola from Biota BD Oy.

The evaluation team would like to thank IOM Kosovo and IOM Skopje staff and the Finnish Liaison Office in Pristina as well as the Unit for Western Balkans in the Ministry that supported and provided valuable input at short notice to the evaluation.

This evaluation has been funded by the Ministry for Foreign Affairs. The consultant team bears sole responsibility for the contents of the report. The report does not necessarily reflect the views of the Ministry.
Abbreviations

CEDAW  Convention on the Elimination of All Forms of Discrimination against Women
CRC  Convention on the Rights of the Child
DARS  Direct Assistance and Referral Services
EU  European Union
F.Y.R.  Former Yugoslav Republic (of Macedonia)
HQ  Headquarters
ILO  International Labour Organisation
INGO  International non-governmental organisation
IOM  International Organisation for Migration
KFOR  The Kosovo Force
KPA  Kosovo Plan of Action against Trafficking in Human Beings
LTN  Linja Telefonike e Ndihmes
MFA  Ministry for Foreign Affairs (of Finland)
NATO  North Atlantic Treaty Organisation
NGO  Non-governmental organisation
NRM  National Referral Mechanism
ODA  Official Development Assistance
OSCE  Organisation for Security and Cooperation in Europe
PISG  Provisional Institutions of Self-Government
SIDA  Swedish International Development Cooperation Agency
SOP  Standard Operating Procedures
THBS  Trafficking in Human Beings Section (Kosovo Police)
TOR  Terms of Reference
TPIU  Trafficking in Persons Investigations Unit
UNDP  United Nations Development Programme
UNHCR  United Nations High Commissioner for Refugees
UNICEF  The United Nations Children's Fund
UNMIK  United Nations Mission in Kosovo
USAID  United States Agency for International Development
VAAU  Victim Advocacy and Assistance Unit
WPU  Witness Protection Unit
1. Summary

The Finnish government funded project Counter Trafficking: Prevention and Capacity Building in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia has been implemented by the International Organisation for Migration (IOM) since June 2004. The process from the initial project proposal until this evaluation assignment has been long: first proposal was drafted in 2001, contract was signed in June 2004, the project started in July 2004 and the two-year project is ending in December 2006, with a no-cost extension of six months (July - December 2006). IOM would like to continue the project with another six-month extension.

Had the project started without years of delay the relevance of the IOM work would be better. Both the Stability Pact Task Force on Trafficking in Human Beings was created and Palermo Trafficking Protocol was adopted in 2000. The counter trafficking activities were increasing in the region and IOM was among the first international actors in the field. Activities implemented through this project might have been more relevant at that time. As the years went by in getting the project approved (2001-2004), the approach of the project should have been heavily modified in order to achieve the best possible results and positive impact. This is especially the case in Kosovo where similar public information campaigns had been run by several international organisations already before IOM project started.

It is obvious that the need to counteract trafficking was initiated by the international community, which had an interest to stabilise the region. The Stability Pact Task Force on Trafficking in Human Beings emphasised development of local participation, responsibility and accountability of anti-trafficking efforts in order to achieve regional ownership and sustainability.

It might be appropriate to question the existing political will in both Kosovo and Macedonia especially when counter-trafficking activities are heretofore funded by international donors. In paper the national referral mechanisms and reform of legislation look fine, best examples, but the actual implementation is facing serious problems. It seems that also in the future counter trafficking activities will heavily depend on external funding both in Kosovo and Macedonia, which hampers the promotion of ownership.

The implementation of this counter trafficking project has focused on general awareness raising and information campaigns, capacity building for law enforcement and other authorities at operational level and for NGOs and supporting the referral mechanism, including financial support for telephone help lines run by NGOs. Also the Secretariat in the National Coordinators’ office has been supported.

The role of NGOs is of great importance in counter-trafficking activities as well in the Western Balkans as it is in EU countries. As victims of trafficking do not often trust on authorities, NGOs might appear or be more attractive channel to seek assistance and help. In addition, NGOs often seem to have more knowledge and capacity to tackle trafficking than the governmental authorities. There is, however, a risk that NGOs are accorded the responsibilities that should be taken care of by governmental bodies.

Capacity building needs are evident in the region. This project has invested a lot in producing training materials and manuals and organising training at operational level. The follow-up approach with a mini-project is promising and we believe that the best practices and far reaching impact can be found there. Also the most vulnerable groups to trafficking have been reached.

However, capacity building of governmental authorities has not involved enough emphasis on trainer training and institutional strengthening. This is an inefficient and unsustainable way to carry out capacity building.

The impact of the awareness raising campaigns is difficult to assess and especially so in Kosovo due to the fact that several campaigns have been organised by various actors in recent years. IOM is supposed to evaluate the impact of the awareness raising campaigns and results should be available in December 2006.
The cost-efficiency of the public information campaigns is questionable if compared to other similar kind of campaigns in the region. Info campaign is the easiest way for donors and implementing agencies to fund NGOs. It is much more demanding and time-consuming to build functional structures and strengthen institutional mechanisms in cooperation with the government.

IOM is implementing the project like the resources would be core funding from the Ministry for Foreign Affairs of Finland (MFA) and not project funds which they are. When taking a closer look at the projects financed by the international donor community and implemented by the IOM common elements with the Finnish funded project are many. It is an interesting comparison that most of the other counter trafficking projects implemented by IOM Kosovo and Macedonia have total budgets that are smaller than the share of the mission support costs and office costs alone of this Finnish funded project.

Mission support costs and total office costs form 30 per cent of the total sum of staff and office costs. These budget lines are also among the ones that generate overhead. Therefore, the more the project covers IOM costs directly the more IOM charges management overheads for the IOM headquarters.

Project management including the planning, monitoring and reporting as well as financial administration is not of the best quality. Project plans do not include information on the intended results and specified beneficiary groups, on project staff being responsible for the component nor any milestones for work. Reports are heavy and focusing only on activities undertaken. Financial reporting has not been accurate and IOM has overcharged management overheads. It remains subject to further enquiry to verify if there are overcharges also in the salaries. It is evident that the MFA guidelines for proper reporting have not been sufficient.

With a total budget of 2.5 million EUR the disbursement pressure has led IOM to apply unsustainable practices. The local absorption capacity is weak and local contributions are lacking. We do not regard a no-cost extension based on the current budget and updated work plans feasible, relevant nor sustainable. Yet, we appreciate the IOM work in the Western Balkans and believe that Finland should continue supporting the IOM counter trafficking project after certain corrective measures have been taken.

We recommend a contract for one year with special focus on the following issues:

IOM project management
- IOM should draft an objective-oriented plan indicating results to be achieved, by whom and by which time.
- The revised plan should be designed with local partners in a joint planning workshop including a detailed budget for extension of one year and emphasising sustainability in the exist strategy.
- Awareness raising: Mini-projects at the local level are warmly recommended with focus on children, drop outs and youth or other groups at high risk for trafficking.
- Capacity building activities redirection: special emphasis on trainers’ training and institutionalisation of the training of governmental authorities.
- Ministry of Justice, including prosecutors and judges, should be included in the trainings activities.
- Referral system, help lines and NGO networking: Funding for the help lines in both Kosovo and Macedonia should be temporarily put on hold until the amounts of funds other donors provide to support these same lines have been clarified. From sustainability viewpoint it is crucial that help lines are included in the national referral mechanisms.
- Cooperation and coordination between NGOs is highly appreciated. NGO networks already exist in Kosovo and Macedonia, but the project should facilitate in strengthening their network structure and co-operation modes and coordination of counter-trafficking work.
- Project funded offices are not institutionally nor financially sustainable. Therefore, funding for the National coordinator’s office should be terminated. In Macedonia, financial support to the National Commission should not even be considered.
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- Project management structure must be clarified and roles and responsibilities of the key stakeholder groups need to be specified; same persons cannot be members both in the Steering Committee and the Supervisory Board.
- IOM should return the overcharged management overhead as well as the expenditure allocated for the second international IOM staff member and re-allocate these funds to implement this project.

Finnish Ministry for Foreign Affairs
- In the new agreement contractual clauses concerning the financial reporting and interest calculation should be stipulated in detail.
- Responsibilities between MFA and the Liaison office in Kosovo should be clarified: the Liaison office represent the donor in the Steering Committee and the Ministry in the Supervisory Board.
2. Introduction

The Counter Trafficking: Prevention and Capacity Building in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia project proposal was originally drafted in 2001 and sent to the Finnish Ministry for Foreign Affairs (MFA) which has discussed the proposal in the Project meeting in February 2002. At that time Project meeting was the inter-ministerial body screening for all financing proposals and making recommendations for the decision making. This regional project proposal covered Kosovo, Montenegro and Southern Serbia from Serbia and Montenegro and F.Y.R. of Macedonia, consisting of three phases: 1) identification of actors in counter trafficking both among public authorities and civil society (non-governmental organisations); 2) information campaigns, advice and support services for victims and potential victims of trafficking, one key element being establishment of education and employment opportunities and 3) national and regional plans of action for combating trafficking. According to the project summary sheet the project duration was 1.3.2002 – 31.12.2005 (34 months) with a budget of 3 million EUR.

That summary sheet information does not match with the original project document in which project duration is 24 months and budget estimate 1.6 million EUR. There were three main elements in the project: 1) information to the public and awareness raising campaign, 2) capacity building and empowerment of local partners (NGOs, local authorities, law enforcement) and 3) technical management and capacity building of assistance network and creation of a service referral system for vulnerable groups. It seems to us that there have been two different project proposals. It is peculiar that so many IOM project documents are undated. However, the project meeting decided to assess the IOM proposal and continue negotiations with IOM.

MFA contracted two persons to carry out an appraisal on the proposed project in May 2002 and the appraisal report was delivered in June 2002. Its recommendations included revision on the project scope and certain themes, e.g. the role of demand for prostitution in trafficking and gender analysis as well as participation and ownership of the governments, to be focused more carefully.

Based on the requirements of the appraisal report IOM came out with a revised project proposal in October 2002. Training for the NGOs and the local government (PISG) were included in the project; yet, the intended activities and modes of cooperation were not specified. The project coverage was limited now only to Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia, project duration being 24 months and the total budget 3 million EUR.

The revised IOM proposal was brought to the Project meeting again in November 2002. Now the project was limited to cover only Kosovo and its neighbouring areas according to the MFA project sheet. The Project meeting agreed to recommend funding for the project. However, the responsible unit for Western Balkans in the MFA was obliged to continue negotiations with the IOM and to request that the second international expert shall not be included in the first phase of the project. This request indicated that the total budget was reduced to 2.5 million EUR. The Project meeting also requested that IOM should confirm the national contributions to the project.

Indeed it should be emphasised that the financing decision was made in the MFA on condition that only one international project manager will be recruited in the project. Subsequently this led to reducing the project budget with 500,000 EUR.

The project document was revised for the second time in order to reflect the questions raised by the gender adviser of the MFA Department for Development Policy. These were discussed by e-mail in December 2002. The main concern of the donor was on not differentiating between “forced prostitution” and “prostitution” e.g. in training, on role of the administration in Kosovo, government contributions to the project and budgetary issues, especially the new long-term international specialist based in Skopje.
The IOM response (December 2002) explained that training component will be extended to cover the whole law enforcement and the approach was also radically modified which required increased budget.

It is not clear from the documentation which were the reasons that caused a huge time lap in the MFA and in IOM Kosovo procedures concerning the contract signing. At any case the negotiations and e-mail discussions continued until May 2004.

Finally the financing contract was signed in June 2004, evidently in a hurry because on behalf of the IOM it was the Head of Mission from Helsinki regional IOM office who signed the contract.

The contract period started in June 2004 but actual implementation only in December 2004. A two-year contract ended in June 2006. IOM requested no-cost extension of six months that is extension of the contract till the end of December 2006. This was approved by the Second Supervisory Board meeting on 26 June 2006 and later endorsed by the MFA.

This evaluation was assigned by the MFA in October 2006. At that time IOM had approx. 700,000 EUR of the original 2.5 million EUR budget available and it had requested another six month contract extension. This final evaluation report was submitted to the MFA in November 2006.
3. Methodology

The Terms of Reference (Annex 1) described in general terms the information to be collected and questions to be answered. Based on the TOR the work plan of the Biota team was produced and discussed with the MFA before signing the contract for the evaluation assignment on the 18 October 2006. The work plan (Annex 2) describes the methodological approach and main issues to be addressed in further detail.

The evaluation aims at providing recommendations for the MFA whether Finnish support should be continued to IOM counter trafficking project.

The collection and analysis of data started in MFA and was continued with visits to Kosovo and Macedonia from 23 October to 3 November 2006. The information was gathered at national level from ministries and institutions under ministerial coordination and controlling, at local level the NGOs and NGO networks were consulted. The discussions were mainly organised as group discussions. Also international organisations and bilateral funding agencies were visited. (Annex 3.)

Synthesis and feedback was drafted and shared with the IOM staff in a wrap up meeting in the end of the field mission in both Pristina and Skopje. The draft evaluation report was produced after the field mission (dated 9 November 2006) and MFA delivered it to local governmental partners in Kosovo and Macedonia as well as to IOM for comments.

In their comments on the draft report, IOM pointed out that some stakeholders have expressed their concerns on the quality of the interpretation provided during the evaluation team’s field mission in Kosovo and Macedonia. Although we can share this concern to some extent, we would like to remind that group discussions and interviews represent only one part of the information sources. In addition to this we have studied written materials: primary materials produced by the project itself and secondary materials provided by IOM, MFA, local stakeholders and other sources. The assessment is based on the analysis and synthesis of all these materials.

This evaluation report is the final version where comments and feedback received have been reflected to the extent possible. The consultant team bears the sole responsibility for the contents of the report.
4. Project context

The project is a contribution to a larger struggle against trafficking in human beings in South Eastern Europe. Trafficking in human beings in the Western Balkans increased heavily after the conflict in the former Yugoslavia in the mid-1990s and early 2000s. Augmented demand for commercial sex was met by trafficking of women and girls across South Eastern Europe and from some countries of the Commonwealth of Independent States. Although numerous legislative and other efforts to combat trafficking have been undertaken by various international organisations, NGOs and governments of South Eastern Europe, trafficking continues to constitute a serious problem in the region. This is promoted by the fact that trafficking in human beings is closely connected with organised crime and corruption.

It holds true that the number of identified foreign victims of trafficking in the region has decreased. Whereas in 2001 the number of assisted foreign victims of trafficking in Kosovo was 136, in 2006 (till October) the number was declined to 17. During the same period, the number of assisted foreign victims of trafficking in Macedonia has declined from 242 to 9. Nevertheless, this is believed to derive from the changed methods of the traffickers rather than real fading of trafficking. As a result of this change, trafficking has become more hidden criminal activity. Trafficked women are kept in rented apartments and hotels and more women have valid documents. In addition, women are paid better than before and are therefore more hesitant to accept the offered help.

It is worth of noticing that the Balkan States are increasingly becoming countries of origin and the number of internally trafficked women and girls for sexual exploitation has increased in recent years.

Sexual exploitation is the main purpose of trafficking in and out of Kosovo. Foreign victims of trafficking originate mainly from Moldova, Romania and Ukraine and smaller numbers from Bulgaria and Albania. However, it has been noticed that the number of foreign victims of trafficking has decreased while the number of local and internally trafficked victims have increased. In 2001, IOM assisted 6 local victims of trafficking while in 2006 (till October) the number was already 24. This problem is serious especially when a high percentage of assisted local victims are minors. Re-trafficking constitutes a genuine problem with regard to both national and foreign victims of trafficking. It seems that demand for sexual services has transferred from internationals to the local men. Domestic violence and economic distress contribute to trafficking. Legalisation of prostitution has been presented as one mean to combat trafficking.

Republic of Macedonia is primarily a destination country for women trafficked for sexual exploitation. Women originate from Ukraine, Romania and Moldova. However, there are recent indications that Macedonia is also emerging as a country of origin, with Macedonian victims trafficked both abroad and internally. The number of assisted local victims of trafficking has increased from zero to 12 between 2001 and 2004. This is worrying especially because large number of national victims is minors. Macedonian authorities are clearly not willing to accept or admit that internal trafficking of national women and girls is an increasing problem in the country. Prostitution and domestic violence constitute great problems in the country.

The major international organisations working and financing counter trafficking efforts in the region are: Organization for Security and Cooperation in Europe (OSCE), IOM, Council of Europe, EU CARDS

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1 See more e.g. on Dottridge, Mike: Action to prevent child trafficking in South Eastern Europe. A Preliminary assessment. UNICEF and Terres des homes Foundation 2006.
2 IOM Kosovo Activities overview. Updated in October 2006.
5 IOM Kosovo Activities overview. Updated in October 2006.
programme, USAID, UNICEF, UNHCR, UNMIK, Norway, Sida, the Netherlands, Italy, Switzerland and Finland through this project.

4.1 International legal and political framework to counteract trafficking

Since 2000, the Stability Pact Task Force on Trafficking in Human Beings, working under auspices of the Organization for Security and Cooperation in Europe (OSCE), has pushed trafficking to the top of the political agenda in the region and pressed the need for cooperation between governments, non-governmental and international organizations. The Stability Pact has emphasised the priorities and needs of the countries of the region in order to achieve sustainability through development of local participation, responsibility and accountability of efforts against trafficking.

The Stability Pact has provided a mechanism of coordination to strengthen cooperation among the countries within the region and to develop and implement anti-trafficking activities. In 2001, the Stability Pact adopted a multiyear anti-trafficking action plan for South Eastern Europe, placing the foundational framework for coordination of the regional anti-trafficking work. It constitutes a framework for relevant actors by addressing main areas of concern, including awareness raising, training and capacity building, law enforcement co-operation, victim protection, return and reintegration, legislative reform and prevention. In addition, the Stability Pact has provided guidelines for development of national plans of action, and recommended the countries in the region to appoint a national/governmental co-ordinator and to establish multidisciplinary national anti-trafficking working groups.

The Stability Pact Task Force on Trafficking in Human Beings has indicated that prevention should be one of the priority areas when addressing trafficking. As the social and economic conditions in the countries of origin are the main root of trafficking, the Stability Pact emphasises the need to address discrimination against women, poverty and lack of employment and children’s lack of access to education as the primary targets of prevention. In addition, the Stability Pact highlights the limited understanding of the issue of trafficking and calls for awareness-raising on the part of governmental institutions, NGOs and the general public. Comprehensive prevention policies include also human rights based reintegration assistance of victims, aiming at prevention of re-trafficking.

To date, all countries of South Eastern Europe have signed and ratified the United Nations Convention against Trans-national Organised Crime and its additional Protocols on trafficking and smuggling of migrants. In December 2000, all countries of South Eastern Europe signed the Palermo Anti-Trafficking Declaration of South Eastern Europe, thereby committing to implement effective programs of prevention, victim assistance and protection, legislative reform, law enforcement and prosecution of traffickers. Countries also acknowledged the need for awareness raising, training, co-operation and co-ordination among government officers, and for cooperation and exchange of information between the countries of South Eastern Europe.

In its Article 9, the Palermo Trafficking Protocol obliges States Parties to establish comprehensive policies, programmes and other measures aiming at preventing and combating trafficking as well as protecting victims of trafficking from re-victimisation. States Parties are thus urged to undertake measures such as research, information and mass media campaigns and social and economic initiatives. States Parties are further obligated to take or strengthen measures to alleviate the factors that make persons, especially women and children, vulnerable to trafficking, such as poverty, underdevelopment and lack of equal opportunity. Finally,

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7 Multiyear Anti-Trafficking Action Plan for South Eastern Europe.
9 See more e.g. on Surtees, Rebecca: Second annual report on victims of trafficking in South-Eastern Europe. IOM 2005.
States Parties are required to adopt or strengthen legislative or other measures, such as educational, social or cultural measures, including through bilateral and multilateral cooperation, to discourage the demand that fosters all forms of exploitation of persons, especially women and children that leads to trafficking. Policies, programmes and other measures include cooperation with NGOs, other relevant organizations and other elements of civil society. In addition, Article 6 of the Protocol requires States Parties to offer assistance and protection for trafficked persons.

Countries in South Eastern Europe are parties to various international legal instruments, which require States to implement laws and policies to counteract trafficking. These instruments include, for example,

- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, Art. 6),
- Convention on the Rights of the Child (CRC, Arts. 34 and 35),
- International Labour Organisation Convention Nos. 29 (Arts. 1 and 4) and 105 (Arts. 1 and 2),
- ILO Convention No. 182 on the Worst Forms of Child Labour (Art. 3a) and

Under UNMIK Regulation No. 2001/09 on a Constitutional Framework for Provisional Self-Government in Kosovo, various above mentioned international legal instruments are directly applicable under Kosovo legislation. These instruments include CEDAW, CRC as well as European Convention for the Protection of Human Rights and Fundamental Freedoms.

4.2 Legislative and policy framework to counteract trafficking in Kosovo and Macedonia

Kosovo is a province in southern Serbia which has been under United Nations administration since 1999. The province is governed by the United Nations Mission in Kosovo (UNMIK) and the local Provisional Institutions of Self-Government. Security is provided by the NATO-led Kosovo Force (KFOR).

UNMIK has implemented several measures against trafficking in human beings through UNMIK regulation Nr. 2001/04 on the prohibition of trafficking in persons in Kosovo. The purpose of the Regulation was to create the specific legislation for the prosecution and punishment of perpetrators of the crime of trafficking in persons and related criminal acts, and the assistance and protection of victims of trafficking and of related criminal acts. The regulation defines trafficking and makes it a criminal offence punishable by 2 to 20 years in prison. Furthermore, it regulates on investigation, confiscation and court procedures as well as on victim protection and assistance through the Victim Advocacy and Assistance Unit (VAAU) within the Ministry of Justice. Other specialised anti-trafficking units are Trafficking in Persons Investigations Unit (TPIU) and Witness Protection Unit (WPU). In 2005, UNMIK adopted Administrative Direction Nr. 2005/03 in order to implement the regulation.

In May 2005, Government of Kosovo adopted the three year Kosovo Action Plan to Combat Trafficking in Human Beings, which consists of measures to prevent trafficking, to protect the victims and to prosecute the traffickers with an aim to reduce trafficking in persons and to mitigate its consequences. So-called Kosovo Team for Combating Trafficking aims at implementing the Action Plan, supporting of reporting, monitoring, reviewing and evaluating the Action Plan and supervising and ensuring cooperation concerning the budget. The inter-institutional Kosovo Team is chaired by the National Coordinator of the Advisory Office of Good Governance, Office of the Prime Minister, which is assisted by the Secretariat currently funded by IOM. Kosovo Team includes members from Provisional Institutions of Self-Government in Kosovo (PISG), and UNMIK as well as various ministries, international organisations and NGOs.

Republic of Macedonia criminalised trafficking for sexual exploitation in 2002. In 2004, the legislation against trafficking was amended by including forced labour into the criminalised activities. Trafficking is punishable at least by 5 years imprisonment. Macedonia has criminalized also purchasing sexual services from the victims of trafficking. In addition, Macedonia has amended its Alien’s Act by regulating about
reflection period (30 days) and temporary residence permit (at least 6 months) grantable for foreign victims of trafficking.

In 2001, the Republic of Macedonia decided to establish National Commission for Combating Trading in Human beings and Illegal Migration within the Ministry of Internal Affairs. The purpose of the National Commission is to follow and control the trade in human beings and illegal migration, as well to coordinate the activities of the competent institutions against trafficking and illegal migration. In 2005, Macedonia founded the Office of the National Referral Mechanism (NRM), which functions within the Ministry of Labour and Social Policy with the financial support of the OSCE. In addition, Macedonia has adopted a Strategy and a National Plan of Action in March/April 2006. Drafting of the National Plan of Action was heavily driven by international organisations.

4.3 Project intervention logic

According to the IOM plan (project document approved by MFA in June 2004) the project aims at achieving the following objectives and results:

The objective of the programme Counter Trafficking: Prevention and Capacity Building Activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia is

- building of a regional effort to combat trafficking in human beings to, from and via Balkans and neighbouring countries
- building of regional capacity to combat trafficking, through the strengthening of government and relevant authorities in taking appropriate counter trafficking measures at a policy level, while supporting the establishment of an assistance and advocacy NGO infrastructure
- improved capacity of law enforcement entities to combat trafficking in human beings.

The purposes of the programme are

- To establish a functional Government and NGO infrastructure capable of raising awareness on the issue, promoting counter trafficking prevention activities, and building upon existing referral structures in order to create an assistance network, both at country/region levels as well as regionally.
- To facilitate and build regional NGO network and to strengthen the linkage between national and regional institutions and NGOs, thus raising awareness on the trafficking issue at the regional level.
- To effectively train the Law Enforcement personnel from all participating countries in knowledge, measures and procedures of effective preventive border management, including the prevention of document fraud, use of border management equipment and language training, based on the National Governments' strategies and International/EU standards.

The major components according to the Second annual report covering the implementation from December 2005 to June 2006 are:

1. Information to the Public and Awareness Campaigns Focusing on Raising Awareness and Promoting Prevention
2. Capacity Building and Empowerment of Local NGOs and Governmental Partners
3. Technical Management and Capacity Building of an NGO Assistance Network in the Region and the Creation of a Service Referral System for Vulnerable Groups
4. Capacity Building for Law Enforcement Authorities through Targeted Training and Awareness Raising.

According to the financial report of the said period, which is in line with the approved budget, the operational activities are divided as follows:

1. Partners assessment and training
2. Information campaign
3. Prevention based projects
4. Referral system: from SOS Helpline to NGOs Services Providers
5. Evaluation activities
6. Support to the National Coordinator offices / KPA.

It is worth noticing that the intervention logic has not been modified since the early proposal that dates back to years 2001 - 2002. The project document per se has not been modified, but during the implementation IOM has proposed adjustments which have been approved by the Steering Committee and the Supervisory Board and the donor, to better reflect the situation since the project was first designed. Yet, it seems that the fundamental approach of the counter trafficking action should have been redirected in order not to duplicate the work done by others and in order to promote effectiveness and impact of the project.

The main corrective measures concerning the work plan and the project budget deal with budgetary reallocations. Especially IOM has reallocated funds for public information campaigns and awareness raising. The content of the main elements that is information campaigns and awareness raising and training activities has not been revised. This was a surprise for us. One could assume that in the Balkans with all the international donor community players being present from early 2000 until now, the feasibility, relevance and sustainability issues of the project would have needed verification at the time when the implementation started with a delay of two years.

Based on the analysis of the material we are pleased to state that the IOM has implemented project in line with international legal anti-trafficking instruments as well as Finnish National Plan of Action against Trafficking in Human Beings and the Development Policy of the Finnish Government. The Finnish financing for bilateral projects in the Western Balkan region was meant to be of limited duration until 2007 according to the Development Policy. Funding for regional cooperation could continue as Western Balkans is defined as other cooperation region in this Government Resolution. How well the project has been in line with the Stability Pact, emphasising local ownership in the counter trafficking efforts is more problematic question. As it is addressed throughout the evaluation report, we deem this as one of the most critical issues while assessing the success of the project.

4.4 Work plan for the proposed extension 2007

IOM has planned activities for the proposed no-cost extension for the first half of 2007. The work plan is one A4 table including no information on project staff’s work time allocation or component specific budget, also time scheduling is done at very general. There is either no detailed information on activities to be carried out or considerations on intended results or impacts of the activities.

The public information activities (1) would continue by producing TV spots re-broadcasted by local media both in Kosovo and Macedonia, drafting documentary guideline for facilitators in Kosovo and conducting evaluation on public information activities. In addition, IOM proposes that the project would fund a DVD with documentary, TV drama, TV spots and song/video clips to be shared with NGOs, schools, Police, KFOR, Ministries and Secretariats. Awareness raising activities in schools are planned to be extended.

Concerning law enforcement training (2), IOM suggests that it would proceed according to the original project document. In addition, IOM would like to translate the law enforcement as well as other training manuals in Serbian and disseminate it in printed and CD format. Other training activities, such as teacher trainings and SOP trainings would be extended and some new training activities would be included in the project. These new endeavours are, however, not elaborated further which makes it impossible to know what they mean in practice.

Support to referral system (4) is proposed to be extended. This support covers technical support to SOS Help lines and NGO grants in Kosovo as well as NGO meeting/conference and regional seminar on assistance to minors concerning Kosovo and Macedonia.

Support to the coordinator’s offices (6) has been planned to be carried out by funding Secretariats (salaries, office materials and supplies for staff) and by maintaining the websites. Depending on the plans of the Advisory Office for Good Governance, Prime Minister’s office, IOM would also participate in the drafting of new Kosovo national plan of action against trafficking.

All the work plans and reports are activity oriented and in discussions with the project staff we were not able to further clarify what the intended objectives or results might be. Objectives stated in the project document do not specify who is supposed to benefit from the project results or what is the project purpose and against which success of the work could be assessed. As there are no indicators specified in the project and as the beneficiary groups cover wider public it seems to us that project management, planning and reporting skills and experience are not strong. As the proposed extension is similar with the already executed activities, it is difficult to assess how the project has advanced and developed from the beginning.

In the following chapters we focus on the four key elements of the project i.e. awareness raising, capacity building, the referral mechanism and support to the National Coordinator’s office. The project has been implemented both in Kosovo and Macedonia following the same intervention logic. We have structured our assessment on the very fact that Kosovo has a special status. Chapters 10 and 11 discuss ownership, project and financial management issues. Chapter 12 provides an overview on other IOM implemented counter trafficking projects. After the key findings we present our conclusions and recommendations in the end of each chapter.
5. Awareness raising and information campaigns

5.1 Kosovo Awareness raising and information campaigns

IOM conducted a 12-months information campaign, which included song/video clip, documentary “Promises”, TV and radio spots, theatre plays, billboards, posters, bus banners and other materials. Whereas the first phase of the campaign was directed to the general public, the main focus of the second phase was on potential victims of trafficking and traffickers/recruiters. The slogan of the first phase was “Stop! Trafficking in Human Beings” and of the second phase “Don’t Trust Just Anyone”. These campaigns were implemented by a company called OK Division. Visibility of the Kosovo song seems to have been impressive, the song jumped to the top ten and it got more airtime both on radio and TV.

After this 12-months campaign, IOM conducted another 6-months information campaign, which was implemented by the local youth NGO Integra for EUR 38,000. Under the title “I decide for myself” the campaign sought to target mainly young people, parents and society in general. Integra produced wide variety of materials, organised movie nights and toured with a theatre play “People on the Road”. At the same time the Human Rights Radio Network aired programmes on human trafficking.

In Kosovo the total costs accrued by September 2006 are approx. 114,720 EUR for the information campaign activities.

IOM has distributed or planned to distribute documentary to schools, TV stations, Ministry of Culture, Youth and Sports, KFOR and it will be used for the teachers and police trainings as well as future IOM training sessions. TV spots will be broadcasted by various TV stations and used in training sessions. Song/video clip is aired by the TV and radio stations. The DVD with the materials will be shared with schools, NGOs, police, KFOR, ministries, the Secretariat in the Advisory Office for Good Governance, Prime Minister’s Office to be used by them for training purposes.

Several other information campaigns have been organised also during this project. From the early 2000s e.g. UNMIK and OSCE have had their annual anti-trafficking campaigns. Campaigns have also been financed by other international agencies and Ministry of Justice had their own campaign, too.

5.2 Macedonia Awareness raising campaigns

In Macedonia, IOM conducted a more limited public information campaign than in Kosovo. The campaign consisted of TV and radio spots, song/video clip, printed ads, posters, postcards and other materials. The campaign was channelled through three main components: Artists Against Trafficking, Media Against trafficking and Students Against Trafficking. The campaigns used slogans such as “I am against human trafficking”, “There are no signs. Don’t close your eyes to human trafficking” and “Not everything is as it seems”.

The biggest activity in terms of fund allocation in awareness raising component has been the information campaign “Don’t close your eyes on human trafficking” organised by a company TOMATO. The expenditure of these activities has been EUR 112,681.30 for so far (1 November 2006).

Under awareness raising campaigns there have also been activities in schools. With the project funds 15 primary schools and 17 high schools have received either TV and DVD (expenditure EUR 265.43 per school) or computer and monitor (expenditure EUR 324.69 per school). It is interesting that also Ministry of Education has been donated one computer and monitor under the school information campaign.

In Macedonia the costs of information campaign activities accrued by September 2006 are 112,681.30 EUR according to the information received by the IOM Skopje.
In the future information campaign materials will be used as follows. TV spots will be broadcasted by various TV stations. Song/video clip and radio spots will be aired by the TV and radio stations if the no-cost extension id granted. In addition, print ads/stripes will be distributed in major daily newspapers in Macedonian and Albanian languages. The DVD with the materials will be shared with schools, NGOs, police, ministries, the Secretariat to be used by them for training purposes. IOM is also going to assign an evaluation on the information campaigns. It is surely difficult to measure whether less people were trafficked because of the campaigns.

5.3. Assessment of relevance, impact and sustainability

The wider public information campaigns must be assed in the light of the fact that also other international organisations and donors have funded similar kinds of anti-trafficking information campaigns during the last years. One should also remember that information campaigns also promote the visibility of the project donor and implementing agency in the public. This kind of action is one of the easiest ways to implement counter-trafficking projects, but not the most effective way to achieve results and to prevent trafficking.

In general, prevention campaigns should aim at empowering rather than frightening people by evoking images of the dangers and risks in migration. Information on migrants’ rights as well as possibilities and options for safe migration should also be included in the public information campaigns aiming at preventing trafficking. It is positive that wider public information campaigns of this particular project do not represent victims in a stereotypical way, which we regard especially successful and important. More limited and well targeted campaigns might, however, have had better chances to reach victims or potential victims.

IOM has planned to carry out an evaluation on the possible impacts of its awareness raising campaigns. While assessing these campaigns, it should be noted that many research have highlighted the ineffectiveness of this kind of wide media campaigns. There are many reasons for that. Firstly, victims do not often identify themselves with the victim profile used in the campaigns. Secondly, very often information campaigns do not reach the target groups because the campaigns are designed too wide and general to be able to touch anyone. Moreover, it must be reminded that in areas where economic conditions are poor, the intended effects of information campaigns might turn out to be quite limited. It is worth noting that the real number of victims of trafficking has arguably not decreased in the region, although numerous similar kinds of information campaigns have been conducted by various international organisations in the region.

It is very difficult to evaluate the impact of awareness raising campaigns. According to the UNICEF 2006 report, hardly any proper evaluation has, in fact, been carried out in this region. It is impossible to say what kind of impacts if at all the IOM information campaign specifically has had to the numbers or trends of trafficking.

It is not that evident to us how computers and other equipment link with information campaign activities at school level. At any case they don’t fall under the best practices of increasing the awareness of young people in trafficking related questions.

It is surprising that no critical views on the limitations and restrictions of wide media campaigns are brought up in the project plans or reports of the IOM. However, it is very positive that the issue of trafficking has got visibility and the understanding that “victim can be next door” has generated due to this kind of information campaigns. Visibility of the Kosovo song seems to have been impressive. The song jumped to the top ten charts and therefore it was played both on radio and TV. The Macedonian song got on the top of the charts as well.

We appreciate the small-scale awareness raising activities, such as movie nights, street actions, group discussions, theatre plays, bus ads etc focused on groups specifically defined and at limited geographical area. These mini-projects have been implemented by local partners.
The costs of the information campaign are high when compared to similar campaigns in the area. With similar approach and nation-wide coverage e.g. Ministry of Justice in Kosovo launched their campaign with 60,000 EUR.

To summarize, the relevance, impact and sustainability criteria are met what comes to the awareness raising in the form of mini-projects. The local institutions are involved and feel confident with the success of their work. These small-scale interventions have also been well targeted.

The impact of IOM information campaign remains an open question. The relevance is questionable because of so many similar campaigns have been organised in Kosovo. In Macedonia the situation is different and information campaign might be more relevant. Sustainability of chosen approach is critical due to the fact that production of various kinds of public relations materials is disposable and creates dependency on further external funding. However, if the TV and radio spots, documents and other electronic materials will be taken in active use and disseminated without project funding from IOM or others, the sustainability criteria will be met. This remains to be ensured by the IOM.
6. Capacity building and follow-up activities

IOM decided on three main training components within the project:

- training and follow-up mini-projects
- training for law enforcement and
- training for other institutional and civil society partners.

6.1 Kosovo

Partners for the first component Training and follow-up mini-projects were selected from both government organisations and NGOs. In Kosovo they were: Ministry of Education, Science and Technology, Department of Mental Health (Ministry of Health), Department of Youth (Ministry of Culture, Youth, Sports and Non-residential Issues), Ministry of Local Governance and from NGOs INTEGRA, Norma, Teuta and Mundesia.

Five training modules were organised, dealing with various topics around trafficking. The modules were: 1) Fundamentals of Human Trafficking, 2) Human Rights and Trafficking, 3) Direct Prevention of Trafficking in Human Beings, 4) The Role of Information Campaigns in Combating Trafficking and 5) Direct Assistance and Reintegration of Trafficked Persons. Afterwards, the selected partners implemented altogether 16 follow-up mini-projects, which were all funded up to EUR 7,000. For example the Ministry of Culture, Youth, Sports and Non-residential Issues trained 17 human rights and human trafficking ambassadors for every region. NGO Integra organised performance for high schools where all the activities of the play from manuscript to acting were carried out by teenagers themselves. Ministry of Education organised painting sessions in primary schools during which children were supposed to describe their own understanding on human trafficking. Mini-projects have directly dealt with youth and school children with concrete ways of working together.

Training manuals were produced and according to project staff they will be disseminated to various governmental actors and to NGOs. These governmental and NGO partners are specified and the idea is that they will organise training sessions on their own. IOM also intends to use these manuals in their future training events.

Training to law enforcement personnel was organised through several Training of Trainers sessions. The aim of the training was to raise awareness on trafficking, increase skills in identifying and assisting victims as well as perpetrators’ identification and prosecution. Trainers consisted of Border Police, Police Academy, Directorate of Major Crimes and Directorate of Organised Crime (THBS). Special training for judges and prosecutors was delivered in order to raise awareness among these actors on prosecution. In addition, few law enforcement officers from both Kosovo and Macedonia visited Rome in order to become familiar with Italian counter trafficking activities.

Manual for law enforcement training was produced by an international long-term consultant. Some parts are still pending although the consultant is not working for IOM anymore. The manual was originally produced in English and for so far it has not been translated in Albanian and Serbian languages. IOM intends to disseminate the manual to governmental and NGO partners and it will be used by IOM and police trainers as well as the Kosovo Police School students and other police/judiciary trainees.

The last component of capacity building activities consisted of training sessions for volunteers working for the telephone help line, media training, and teacher training, which was conducted in collaboration with Ministry of Education, Science and Technology and UNICEF run Life Skills project. The issue of trafficking related information has been included in the cross-curricula for the 9th grade, as well as for the 8th grade. This is a milestone and historical step in counter trafficking work.
The project has also organised training for NGOs, shelter staff, victim advocates from the Ministry of Justice, Consular offices, Human Rights coordinators at ministries, spokespersons at ministries, students, mental health professionals among others.

6.2. Macedonia

Again, IOM selected four partners both among the Macedonian government and NGOs. They were: Department for Gender Equality (Ministry of Labour and Social Policy), Department for Social Protection (Ministry of Labour and Social Policy), Ministry of Education, Institute for Social Work and Social Policy (Faculty of Philosophy) and NGOs ESE, Save the Children, Forum of Albanian Women and Organisation pf Women from Kriva Palanka. Five training modules were organised – one together with Kosovar participants, dealing with various topics around trafficking. In Macedonia the fifth module dealt with Project Cycle Management, the other four modules being the same as in Kosovo. Same manuals as in Kosovo will be disseminated to various governmental actors and to NGOs in Macedonia as well.

As a follow-up to the organised training sessions the selected partners were supposed to plan and carry out mini-projects related to content of the training sessions. IOM Skopje has supported altogether 14 mini-projects implemented mainly by NGOs. Still, out of these 14 projects only three have been implemented by governmental bodies; namely by Ministry of Education and Science and Ministry for Labour and Social Policy. The total amounts of the mini-projects vary from 1,824 up to 6,941 EUR.

Training of law enforcement personnel was planned together with the Secretariat of the National Commission for Combating Trafficking in Human Beings and Illegal Migration. IOM trained also consulate officials, ministries’ spokespersons, media personnel, social workers and teachers. Also in Macedonia some specific action has been carried out among the Roma, the most exposed group, as well as among drop-outs, non-attendees and institutionalized children.

IOM comments on the draft evaluation report reveal that the organisation prefers organising training events for operational or grass root level persons rather than ensuring sustainable structures for training.

6.3. Assessment of relevance, impact and sustainability

Based on the interviews made, we can conclude that the need for training and capacity building is evident especially in the sector of law enforcement. Training of law enforcement authorities about the definition of trafficking and its limits to other related phenomena, criminal law, identification of victims and their subsequent treatment by the police and the criminal justice system is very important.

IOM says that it has prepared the training programme jointly with the local authorities. It seems, however, that in some cases the training sessions have not dealt with the most relevant issues or been able to reach the concrete level of knowledge. Therefore, the question on how the training sessions have been able to meet the expectations and requirements of the participants remained somewhat open. According to our understanding the police, judges and prosecutors need highly specialised and concrete training in order to effectively utilise the obtained information in their daily work. Aims (objectives) of training should have been defined for each training module and training session. Especially because various international actors organise training for law enforcement and other authorities, we think that IOM could clarify what is the added value of training organised by IOM.

IOM has produced several manuals and they seem reasonable. The manual for law enforcement training has been professionally drafted. It is very informative, covering issues such as anti-trafficking legislation, identification of victims etc. The manual also includes case studies and group works which create the basis for applying adult learning oriented methods. On the other hand, the manual with lengthy narrative parts is not very trainer friendly. The manual should have been structured modularly by giving the trainer concrete contents and tools for each session. Now it seems that it demands quite a lot from the trainer to create
training contents for modules. In addition, had the author designed the manual with visualization elements, such as graphics, statistics and pictures the manual would look more interesting. Although the manual is a good start, a more useful set of guidelines would include training modules with respective objectives, facilitation and training methods, practical cases and visualization materials for each module.

Mini-projects have been able to reach groups that are most vulnerable to trafficking, such as children, drop outs, Roma minority and commercial sex workers. Educating children about trafficking is especially reasonable. More needs to be done especially because internal trafficking of minors has recently increased and taken new forms such as recruiting children to beg in the streets. 

We regard mini-projects as an excellent way of promoting active use of training contents and even more profoundly as a way to share the knowledge and ideas, not only disseminating information. We appreciate especially the creative and participatory learning methods applied in many mini-projects. This way of learning might generate more successful and long-term results.

It is interesting that originally the mini-project was planned to span over longer implementing time (six weeks) and be considerably limited with a max budget of 1,000 EUR according to IOM internal discussion (October 2002). In practice the project has limited the implementation to four weeks according to the final reports and expanded the budget to a maximum of 7,000 EUR for reasons not known. It is widely admitted that the time schedule for planning and implementing the mini-projects was too tight which in turn can be seen in the unexpected low number of mini-projects realised. In theory eight partners x four modules x two project sites totalling 64 mini-projects for which a lump sum of 166,000 EUR was allocated. According to IOM information the share of the mini-projects is 148,181 EUR (payments made to 26 mini-projects).

Also the governmental implementing organisations, ministries faced problems with receiving the funds from the Ministry of Finance where the IOM disbursement was made. On the other hand, the critical question of absorption capacity of the implementing bodies must be raised; that is those who also participated in modular training.

In addition, the original plan was based on the idea of two participating NGOs and two governmental bodies (2+2) but this was later widened to involve four NGOs and four governmental bodies (4+4) both in Macedonia and Kosovo. At any case the original budget allocation was exaggerated. MFA should have scrutinised the budget details more carefully before the financing decision was made. The selection process applied by IOM when choosing the NGOs is not clear, the selection criteria seems rather vague. This is not to say that the selected NGO partners would not be working well. Yet, during the field visit we found out that some of the largest NGOs/NGO networks have not been involved in the project but from another viewpoint their role might have been stronger and the impact of the work wider.

Training media personnel seem important especially if names of the victims of trafficking are revealed in newspapers and other media at least in Macedonia. This violates rights of the victims protected under international anti-trafficking legal instruments. In the worst cases, revealing names of the victims might end up in severe consequences. Therefore, media personnel seem to need training about data protection. In addition, especially key concepts, such as trafficking, smuggling of migrants and prostitution, and their differences are not correctly understood. This promotes misunderstandings among the wider population and hampers counter trafficking activities.

IOM believes in ensuring sustainability by organising training events at grass root level; this has been stated many times. We slightly disagree. Based on experience in similar transition and developing societies we are confident that more efficient and effective option would be to invite and involve the local stakeholders in planning and true decision making. What comes to the capacity building the only sustainable way of working is to lay down the basis on local institutions and strengthen their capacities and skills in organising training. Focus should be on trainer training as it is also an effective way to strengthen institutional cooperation. This should be the guiding principle in the IOM exist strategy.
7. Contribution to the Referral mechanism

7.1 Project support in Kosovo and Macedonia

In Kosovo IOM has supported the system for direct assistance and referral services. Together with other stakeholders IOM finalised standard operating procedure (SOP) for local victims, which has been operational as of February 2006. Standard operating procedure for foreign victims has been effective as of December 2004. The procedures outline the roles and responsibilities of organizations and local actors involved. These actors include OSCE, IOM, Victim Advocacy and Assistance Unit within the Ministry of Justice, Ministry of Interior, and Ministry of Labour and Social Welfare as well as some local NGOs. As the situation of local victims is considered to be more problematic, they are provided more comprehensive and long-term reintegration services. In more concrete terms, IOM supported travel and other expenses of the stakeholders caused by meetings and training sessions.

In Macedonia, IOM supported the establishment of the Direct Assistance and Referral Services Working Group (DARS), which aim is to develop and maintain a network of direct assistance service providers. It remained obscure to us how DARS is connected with the governmental National Referral Mechanism (NRM) and what are the differences of the roles and responsibilities between them.

In 2005, Macedonia founded the Office of the National Referral Mechanism, which functions within the Ministry of Labour and Social Policy with the financial support of the OSCE. The role of the National Referral Mechanism is to improve identification of the trafficked persons, to inform about available services and to help trafficked persons, to advance cooperation between different actors, to raise public awareness about trafficking and to develop standard operating procedures. Based on the information received in Skopje the national referral mechanism is functional and led by the Ministry for Labour and Social Policy. The project established group is led by IOM and participants in both groups are nearly the same.

According to IOM “the National Referral Mechanism was actively participating in the DARS activities and as the intention is to handover the DARS activities to an institutional partner that would continue the work of DARS after project ends, the NRM has been identified as most suitable partner for this”. If the NRM already exists and if it is responsible for similar kind of services, offered by the same stakeholders, shouldn’t DARS be integrated in the governmental mechanism (NRM)?

In order to reduce the potential for trafficking in human beings, IOM has through NGO partners (Organization of Women of Kriva Palanka and Forum of Albanian Women) given micro economic empowerment grants for women in border communities of Kriva Palanka and Tetovo. The purpose was to influence concretely on the root causes of trafficking by providing rent and renovation assistance and training for women willing and capable to run their own business.

In addition, IOM has supported cross border cooperation between NGOs by inviting various NGOs to share information, exchange best practices and encouraging cross border networking.

7.2 Assessment of relevance, impact and sustainability

We believe that support for NGO networking is relevant in this context when keeping in mind the fundamental role of the governmental institutions in combating trafficking. We find empowerment grants as most effective ways to prevent trafficking. Therefore, we would like to encourage IOM to continue and further develop this kind of empowering activities, which aim at long-term prevention of trafficking.

We regard the support for national referral systems important. There seems to be a need for DARS group in Kosovo whereas in Macedonia the governmental mechanism (NRM) exists and seems to provide similar kind of services as the DARS that was established by this project. The relevance and sustainability of supporting the DARS might be questionable in Macedonia because the role and responsibilities between
NRM and DARS are not clear. For the time being it is not possible to assess impact of the project support. The project support to DARS in Kosovo is relevant.

It remained somewhat obscure to us, how the DARS Group is connected with the governmental NRM which was established in 2005. From what we have learnt in Skopje the services offered both by the DARS and NRM are heavily dependent on external funding. It is critical that large part of services for victims is offered by NGOs that are funded by international organisations. This is to say that the financial sustainability of the referral system is weak in Macedonia. During the discussions it became clear that the government is reluctant to admit the existence of local victims of trafficking. This might lead to the discriminatory practices with regard to the fair treatment of victims.

The differential referral system in Kosovo might lead to the continuous victimisation or re-trafficking of foreign victims of trafficking. If foreign victims of trafficking are not willing to return to the country of origin, they will stay in Kosovo (possibly in exploitative conditions) and eventually fade out from the assistance system. Another option is that they are repatriated to the countries of origin where the reintegration programmes are often weak due to lack of funds and cooperation.

All in all, governments’ ability to take over the referral system and to face economical responsibilities should be strengthened. This should be seriously considered already when planning project approach. However, the situation in Kosovo is more complex due to lack of financial resources and difficulties and problems arising from the post-conflict situation.
8. Set up and support for telephone Help lines

In many countries the telephone help lines are run by NGOs and this is regarded especially useful and an advantage when remembering that many victims of trafficking might fear or have suspect on the confidence of the police or authorities in general.

8.1. Project support in Kosovo and Macedonia

In Kosovo, IOM has supported a Help Line for victims of trafficking run by NGO Linja Telefonike e Ndihmes (LTN). It became operational in December, 2005 and since then received about 1000 calls mainly from people who seek information about trafficking. The Help Line offers merely emotional support for victims of trafficking. IOM has supported all the activities of the Help Line, including rent, staff salaries and technical support in buying necessary equipment. In Kosovo the Ministry of Justice has also a toll free help line.

Although IOM has assured to us that the help lines refer the victims to service providers, it is worth noting that help line at least in Kosovo is not directly included as an actor in the Standard Operating Procedures for Direct Assistance and Support (SOPs) either for local or foreign victims of trafficking.

In Macedonia, two help lines have been supported by the project. The Open Gate – La Strada help line is focused on Roma Community. IOM funded the NGO to implement a small-scale information campaign on the use and services of the SOS Help Line. However, this NGO and the same helpline are financially supported at least by the Dutch government and USAID. IOM states that synergies have been created. The project is said to have funded specific activities without indicating what these have been.

In addition, IOM assisted the Organization of Women of the City of Skopje in implementing the “Support” SOS line project, which purpose was to develop and conduct educational training sessions for operators. IOM supported the project also by purchasing equipment to run the SOS line. In March 2005, the SOS line became a nation-wide line for victims of trafficking and domestic violence in partnership with the Ministry of Labour and Social Policy.

8.2 Assessment of relevance, impact and sustainability

These help lines might offer an important channel to inform about trafficking in general and to identify and assist trafficked persons. Telephone help lines might serve as the first link in the chain of service providers and as a strengthening factor of referral system. The fact that help lines are often run by NGOs makes it easier for people to call and find counselling. It is, however, paramount that the help lines do not only give emotional support but are also able to refer victims to the service providers. To do this properly, the help lines must be well-coordinated within the referral system and to be connected to the service network in order to guide victims to seek concrete assistance and help. Because the existence of this link between help lines and service providers in Kosovo remained open, the danger that the victims do not reach the referral system seems to be quite immense and project might have negative impact. The usefulness of having several help lines for a small amount of population is also one question to consider in Kosovo.

In Macedonia, the question raises whether it is relevant to fund the same help line with many other donors. Funding of the help lines after this project has not been secured by the government, although the NGO Organisation of Women of the City of Skopje is at least partly funded by the Ministry of Labour and Social Policy. The other help line is run by Open Gate - La Strada which according to the NGO interviews relies heavily on international funding. This questions not only the financial sustainability of the help lines but also the viability of the services.

All in all, governments’ ability to face economical responsibilities arising from the help lines should be strengthened. Telephone help lines established only for year or two is not reasonable. Therefore, IOM needs
to ensure that the basis is solid for the future of this kind of help lines. This should be seriously considered already when planning the project approach.
9. Support to the National Coordinator’s office in Kosovo and in Macedonia

In Kosovo the National Coordinator of the Advisory Office of Good Governance is under the office of the Prime Minister. IOM has funded the website for the National Coordinator’s office which should be published in mid-November 2006. IOM has funded salaries of two assistants working with anti-trafficking issues in the Secretariat. Salaries have been paid since April 2006. For the first five months there were Executive and Administrative Assistants contracted with respective salary levels, although so high that it is probable that local government budget could not allow these. Since beginning of September 2006 both assistants changed. The job descriptions were also revised bringing new assistant posts into Executive level and increasing the monthly salaries for the positions with 300 EUR compared to the earlier assistant post salaries. (Annex 5.) For the time being the local government has not reserved funds for the Secretariat.

Also in Macedonia IOM has supported the establishment of website for the National Commission. Project expenditure for Kosovo has been bigger than funds allocated to work in Macedonia. Due to this a Macedonian Steering Committee / Supervisory Board member has proposed that the project would cover expenditures of establishing an office with equipment for the National Commission, Ministry of Internal Affairs in Macedonia. In other terms, support for their National Commission. From the minutes of the Steering Committee and Supervisory Board meetings one easily gets the impression that this proposal has been discussed. However, the written proposal is not known to all parties, not even in the Ministry of Internal Affairs. Also the requested funding is unclear as the written proposal indicates no budget or time schedule. In the Ministry recruitment and support for staff costs emerged in the discussions.

IOM has another opinion on this. They commented that there was a budget submitted with the proposal as well, for 25,860 EUR. Secondly, only 5,000 out of this budget have been agreed by the Steering Committee and Supervisory Board to be funded according to IOM. Furthermore, it was explained that “the 5,000 EUR will help furnish an office, to be used by the Secretariat. The equipment will be donated to the Ministry which will provide long term sustainability”. IOM referred to the minutes. Unfortunately IOM did not specify when the proposal has been discussed and approved.

According to the minutes of the Steering Committee the suggestion to support the office of National Coordinator was presented in the second meeting (5 December 2005). A proper proposal was also requested by the Supervisory Board (14 December 2005). The third Steering Committee meeting was held in April 2006 and according to the minutes the proposal will be taken into consideration for the extension of the project. The Supervisory Board meeting (26 June 2006) seems to have approved establishing an office in Macedonia. However, there is no specification on the agreed proposal or budget. In the minutes it is also stated that MFA approval is needed before starting establishing the office.

We understand that the Ministry budget might be very limited. Still we regard this proposal unacceptable for sustainability reasons.

Process to draft Strategy and National Plan of Action in Macedonia has been donor driven. In addition, it is good to remember that Macedonia would like to join the European Union as soon as possible. The real problem of trafficking to, in or via Macedonia does certainly not advance these aspirations. It is especially difficult for authorities to admit that Macedonian citizens are increasingly becoming victims of internal trafficking.

9.1 Assessment of sustainability criteria

It is notable that the implementation of the Kosovo National Plan of Action as well as the Secretariat relies on external funding, which makes the continuity and credibility of the fight against trafficking questionable. Project funded staff have been recruited by the project due to limited government resources in Kosovo. In
principle it is reasonable to support and strengthen the national expertise. It is problematic that the local expertise on trafficking in human beings in the Secretariat, the highest national governmental body, relies so heavily on external funding. This questions also the local commitment to the whole Secretariat and its work on combating trafficking. The government budget is going to decrease in 2007 which indicates that funds for anti-trafficking efforts might be even more limited. High salary level compared to government paid salaries increases the vulnerability of the work of the Secretariat. It is problematic that IOM is the employer of the recruited assistants. IOM needs to ensure that the basis is solid for the future of the Secretariat. This kind of issues should be seriously considered already when planning the intervention approach.

In Macedonia we got an impression that various important legislative and other measures have been taken. Nevertheless, political commitment to counteract trafficking remains open question. It seems that counteracting trafficking has initiated from outside by international donors and organisations, such as OSCE and IOM, rather than from inside as a response to the real and recognised problem of trafficking. This critic is strengthened by the fact that both primary national actors against trafficking, i.e. National Commission and the National Referral Mechanism, are strongly depended on external funding. Also services offered by the NGOs rely fully on external funding. This seriously hampers the sustainability of counter trafficking activities in Macedonia.

Establishing offices and recruiting staff with short-sighted project funding is highly unappreciated way to counteract trafficking. It does not meet the sustainability criteria, in turn it creates dependences on external donors and impedes the institutionalisation of the secretariat function. If the Macedonian government is not able to allocate resources (funds, staff, office equipment etc.), let alone finding premises for the secretariat, the political will and commitment to combat trafficking appears to be weak. On paper everything looks fine but actual implementation faces at least serious financial problems and is therefore hindered.
10. Project Management and Ownership issues

IOM Kosovo is the main implementing organisation of this project in that sense that the Project Manager is placed there. Also the financing reports are compiled there. The Head of Mission in Kosovo is also Head of Mission of the IOM Skopje. These three persons are IOM international staff members and their salaries have been charged from the project. Furthermore the Kosovo mission is one of the biggest IOM missions with staff of more than 120 persons. Out of these nine staff members (incl. Project Manager) are working in the Counter Trafficking Unit. IOM has recruited additional staff for this very project, only one IOM local staff member has been working attached to the project from the beginning, yet, not every month. Her work time is only partly allocated for this MFA funded project.

In IOM Skopje the staff amounts to 23. There are currently four persons working for this project and they are all IOM local staff. There has been one international IOM staff member working for the project for the first 13 months according to the IOM contracts and internal salary payment sheets.

IOM also acknowledges that the approach has been very labour-intensive. We agree. During the project actual implementation from February 2005 until this date there has been 10 – 15 persons working for the project all the time. This figure covers all IOM project staff and long-term specialists but not trainers or interpreters. All staff members have not worked full time for this project. The average number of full time persons was at the highest 12.5 (June-July 2005). Now in October 2006 it is 9.75 full time IOM staff members.

10.1 Ownership issues

The delay in the start of the project implementation and activities is explained by IOM by the difficulties of setting up the project management structure. Firstly due to the IOM recruitment process of the project staff and secondly the local counterparts were not identified during preparation and planning phases. It is natural that when the time lag between the financing proposal delivery and signing of the financing contract exceeds two three years things have usually changed in the political context and the society. Especially this is the case in the rapidly changing post-war and transition societies. Still both the appraisal report and the MFA gender adviser’s comments on the proposal were emphasising issues of sustainability and institutional commitment by the governmental bodies and foreseeing problems from lack of commitment, in other terms work and solutions based on unviable project structures and on external funding. It is unfortunate that this IOM project seems not have met sustainability criteria in its work. This is not only for the blame of the IOM. It has become clear and been visible also in the meetings that counter trafficking is highly imposed by the international donor community. Especially in Macedonia there is lack of motivation and commitment to combat trafficking among the civil servants. It is only few exceptions that were mentioned in the discussions showing true interest by concrete action.

In the documents like minutes of Steering Committee meetings and Supervisory Board meetings there is hardly any evidence of discussion or input of local stakeholders. We were told that the bilateral discussions with ministries and so on are regarded as the management team function. As there are no memos or discussion agendas, at least not available for the evaluation team, it is impossible to say anything about the local counterparts’ activeness in project planning and redirecting of implementation.

If ownership is assessed against the local contribution for project activities, it seems to us that there is no contribution in kind either. The trainers have been paid but if they were not paid would they still have participated in the capacity building activities as trainers? This remained an open question to us and to what extend IOM has tried to ensure the ownership issues. Our expression is that there are individuals from different governmental bodies or units that are committed to the counter trafficking work. Institutional links and institutional ownership towards this project and its work hardly exist.
The NGOs are more committed and their knowledge and competence to counteract trafficking is of high quality. NGOs are not represented in the project management structure but they do have feeling for ownership of this project.

In general it is not that evident if local commitment to this very project exists, especially among the Macedonian governmental authorities.

The experience is that one more efficient and effective way of involving the local stakeholders is to have them on board from the early planning and building on their capacities.

10.2 Project Management structure

The project is managed by three level decision making structure: Supervisory Board as a policy level actor approving annual work plans and reports, changes in budget and deviations from overall intervention strategy. The Steering Committee as an operational level actor is responsible for project management and approving work plans and quarterly reports, and Management Teams in Kosovo and Macedonia are responsible for local project management and administration. IOM keeps saying that the donor requested the three-level structure to be applied in the decision making and management. For us this does not actually seem to be the case as the revised project proposal by IOM had already introduced this management structure. In principle this model for management structure is very common and also widely applied in the MFA funded bilateral projects and programs.

In this project there have been difficulties in setting up the management structure and in clarifying the roles and responsibilities of the Steering Committee and Supervisory Board. Their terms of references were approved by the Supervisory Board in December 2005, a year and a half after the two-year project contract been signed.

The more serious problem in the management stems from that curious factor that same persons are members of the Steering Committee and Supervisory Board. We assume this is partly due to the difficulties in finding interest in cooperation among the governmental institutions in Macedonia. The practice of IOM to draft the agenda for Steering Committee and Supervisory Board meetings, to chair the meetings and finally write minutes of the meetings reflects that cooperation could be improved and better management procedures be applied. For us this reflects that there is no understanding of the fundamental function and differences of these two management levels. It also implies that the decision making system is hidden. Further, it seems that also in the MFA there is no understanding or willingness to take action in order to clarify the management structure on their behalf now that the same persons are active in both groups.

When taking a closer look at the Steering Committee and Supervisory Board members it is no doubt that ownership issues have not been paid enough attention. First the Supervisory Board consisted of three donor representatives, three IOM international staff members and one governmental representative from Kosovo and from Macedonia. The Steering Committee had 16 members according to the material prepared by IOM for the Supervisory Board meeting in December 2005. Out of these 16 members there were four members from ministries in Kosovo and four members from ministries in Macedonia. IOM had five staff members and the donor two representatives in the Steering Committee.

Until September 2006 Supervisory Board has met three times and it is positive that now local governmental representatives are more than two. Steering Committee has gathered five times and altogether 31 persons have participated in these meetings. The member turnover is relatively high in both management groups. Our critical finding is that same persons are members of the both the Supervisory Board and the Steering Committee. This is an incorrect procedure.

In the discussions with the project staff we were told that no written documents exist from the lowest level of hierarchy, i.e. management team actions and meetings. Management team function is restricted to cooperation with local partners. In big programmes and projects like this the management team is usually
utilised for effective coordination of work and rolling monitoring tasks aiming at ensuring the progress and success of work done.

### 10.3 Conclusions and recommendations

The main conclusion of the project management system is that this is an IOM project. It is IOM which selects the cooperation partners, including members of the Steering Committee and Supervisory Board. We conclude that the IOM work would be better structured and thus more effective were the management structure fully benefited and Terms of References for Steering Committee and Supervisory Board followed.

Supervisory Board and Steering Committee members cannot be the same persons if any respect is laid on quality assurance and elements of good governance, including transparency and openness. We recommend that the management structure and membership of all key stakeholder institutions be revised.
11. Financial Management

The IOM accounting system is well designed and verifications take place at various phases. IOM accounting system is centralised in the following way: field missions have their accounting system of which a monthly report is sent to IOM headquarters accounting system. Each field mission file is downloaded into HQ accounting system and goes through two validation procedures. Also all financial transactions are to be coded to the appropriate IOM account code and project codes are always required within income and expenditure accounts, and valid project and account codes are maintained by the HQ in Geneva. IOM funds are managed centrally at HQ to maximise interest income. This means that field mission funds should be kept to a minimum level and not to exceed the level necessary to fund one month operations. The system as such seems to be perfect.

The financial reporting follows the original budget lines as drafted in 2002 and the revised version but the units, unit rates and number of units are not presented in the financial reports. In the discussions with MFA and IOM Kosovo, which is in charge of compiling the project financial reports to the donor, it became clear that both the budget and the reporting is based neither on MFA nor on IOM standards and models. This is one factor that causes dissatisfaction in the cooperation and for us it appears to burden both ends; the financial reports cannot be taken directly from the IOM accounting system and the lump sum reporting structure creates problems even for very basic monitoring and auditing tasks.

The budget comprises of two main parts: operational costs and staff and office costs. Under the operational costs are all external local and international employees including consultants, trainers, interpreters or translators. The operational budget comprises of six elements (altogether 43 budget lines):

1. Partners assessment and training
2. Information campaign
3. Prevention based projects
4. Referral system: from SOS Helpline to NGOs Services Providers
5. Evaluation activities
6. Support to the National Coordinator offices / KPA.

In the original project plan IOM had attached a budget that specified the unit, unit rate and number of units, following the classic budgeting model applied by the EC and UN e.g. The budget that is the revised version (our understanding of the document that was undated) also entails this information. In the financial reports the information on units has not been provided, only the total expenditure charged to the project is reported per budget line.

As the expenditure charged to each budget line is not specified in the reports the assessment of cost-effectiveness is pretty difficult. The information provided by the respective financial administrators in Pristina and Skopje clarify the budget allocations and reallocations a little bit but unfortunately the gaps and open questions remain.

As the data requested and received does not cover the whole budget, it is not reliable and does not allow for detailed analysis at this moment. The overall analysis of the fund allocation and expenditure is based on the data of June 2006 provided by IOM to the Supervisory Board meeting. We believe that it provides us also with a credible and reliable overview. Annex 5 includes the original budget proposal, the revised project budget as well as information on the total costs until the end of June 2006.

The share of operational costs was 72 per cent and costs covering IOM staff, office and overhead were 28 per cent of the total project budget initially. By June 2006, 62 per cent of the project funds used has been allocated to operational expenditures whereas the share of the IOM staff, office and overhead is 38 per cent. We think the aim of the project document has not been fully met.
IOM has had the opportunity to comment and correct the draft evaluation report. The comments received from IOM regarding this chapter mentioned often that an issue could be clarified. De facto IOM has not done it. Assessment of project financial management was only a minor aspect of this assignment but it turned out to be significant. Unfortunately limited time resources did not allow the team to complete even the basic financial analysis during the field visit. We fully agree with IOM that confusion could have been avoided had the time schedule enabled the team to stay some more days in Kosovo.

11.1 Project related overhead

The staff and office costs cover the international and local IOM staff and general costs for office facilities etc. On top of the total sum of staff and office costs IOM is charging an overhead of twelve per cent. The percentage was nine and a half at the time when this project was originally drafted. As of January 2003 IOM increased the rate to twelve per cent and this is the rate that has been applied in the contract between MFA and IOM. In December 2005 IOM has revised its overhead counting mechanism and is now taking five per cent of the total costs as an overhead\(^\text{12}\). However, this change has not affected the project for so far.

When analysing the financial reports until June 2006 and cross-checking the amount of overhead charged to the project the total sum of overheads exceeds the agreed 12 per cent share. According to the IOM financial report to the Supervisory Board, by the end of June 2006 the total amount of staff and office costs was 514,843 EUR out of which 12 per cent makes 61,781 EUR. Up until June 2006 IOM has charged overhead totally 71,475 EUR, in other terms overcharged.

IOM explains the difference of 9,694 EUR the following way: “By the end of June 2006 total staff and office costs was: 450,017 EUR. Added to this is the 12% of the salary of the Info Campaign specialist (70,874 EUR), which will be adjusted by the end of the project and thereby the overcharge mentioned above will be eliminated”.

Mission support costs are one budget item under the Staff and office costs. For these costs there is an allocation of 100,800 EUR in the budget. The total office costs (covering facilities, rental, management, communications, security and bank fees) are items of their own and in total 113,540 EUR. Actually IOM Kosovo is charging directly over 214,000 EUR for the use of IOM field mission facilities (in Kosovo and Macedonia). Mission support costs and total office costs form 30 per cent of the total sum of staff and office costs. These budget lines are also among the ones that generate overhead. Therefore, the more the project covers IOM costs directly the more IOM charges management overheads for the IOM headquarters. It is an interesting comparison that most of the other counter trafficking projects implemented by IOM Kosovo and Macedonia have total budgets that are smaller than the share of the mission support costs and office costs alone of this Finnish funded project.

11.2 Staff and personnel costs

According to the IOM accounting procedures the field mission is sending monthly a so called projectization sheet to the IOM headquarters in Geneva indicating the allocation of staff member time to projects. This is done by percentages and international staff is also included in projectization. According to the centralised procedures projectization of official salaries is done by field missions, changes are done by percentages and the payment is made by headquarters. This practice was of our interest and we requested to have a look at these projectization sheets dating back to the start of the project implementation and covering all the IOM staff members, local and international. Other project personnel, like consultants were also included. We are sorry to say that concerning the international staff members, and especially the project manager, despite several requests we were not allowed to see the respective monthly projectization sheets although the information concerning the monthly salaries was provided.

\(^\text{12}\) IOM Resolution No. 1129 (XC).
As a summary table of projectization sheets (Annex 6) is attached. It has been prepared by the IOM Project Manager and does not follow the forms that IOM prepares and reports to IOM headquarters every month. This summary table was provided to the evaluators when the original sheets were requested. The evaluation team received finally and after several requests, the official IOM monthly projectization sheets of IOM staff on the 30 November when the report was ready to be delivered to the MFA. Evidently there were communication gaps in IOM. Information was promised, it was said to be easily available and yet not provided to the evaluators.

In the discussions it was also presented that five per cent of the salaries of the Resource Management Officer and the Chief of Mission are charged to this project (under budget item Mission Support costs). This has not been the case and can be verified in the IOM monthly projectization sheets. Salaries have been charged on this project monthly since November / December 2005 until August 2006. The percentages vary: the Resource Management Officer’s salary has been charged from 5 per cent to 40 per cent and the Chief of Mission’s salary from 5 per cent up to 60 per cent of the monthly salary. Information on the monthly salaries was not provided but the per cents are included in the table in Annex 6.

Based on the projectization data it is more an exception than a rule that the monthly salaries paid and salaries charged to the project would match during the period from December 2004 to June 2006. Taking into notion that some salaries might have been little lower in the beginning of the project and an increase of one or two steps might have taken place and that the terminal emoluments are charged to projects (now eight per cent of monthly salary costs), the amounts still do not match or come close enough with the reported monthly salaries. This is the case when salary costs are analysed by person. There are months that ones salary has been charged applying even three time higher rate than the salary paid to the person. This can be verified by comparing the information on the projectization sheet and monthly salaries (Annex 6) to the financial reports prepared by IOM on a monthly basis.

There have been a lot of staff changes in Kosovo, and also in Macedonia. It seems that the salary level in general is higher in Macedonia than in IOM Kosovo. This was explained by Kosovo project staff being all new recruitments of IOM whereas in Macedonia the project staff was already working in IOM and moved on to this project as old staff members and by the difference in the salary scale. The differences are surprisingly big when comparing the salaries paid among certain titles and we are not that convinced of the explanations provided by IOM. E.g. there are two Senior Project Assistants and the salary of the Macedonian staff member has been more than double of the Kosovar colleague from the very beginning, although there was the international staff member working in IOM Skopje for this project, too.

The analysis of the total amount of salaries paid to project staff, IOM staff members including Info Campaign Specialist in Macedonia, whose salaries have been included in the staff costs when calculating the IOM overhead, during December 2004 – June 2006 is as follows (acc. to budget lines):

<table>
<thead>
<tr>
<th>Role:</th>
<th>Salaries charged €</th>
<th>Actual salaries €</th>
<th>Balance €</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Manager</td>
<td>155,377</td>
<td>140,835.55</td>
<td>+ 14,541.45</td>
</tr>
<tr>
<td>Senior Project Assistants</td>
<td>33,567</td>
<td>39,590</td>
<td>- 6,023</td>
</tr>
<tr>
<td>Project Assistants</td>
<td>57,076</td>
<td>47,545.30</td>
<td>+ 9,530.70</td>
</tr>
<tr>
<td>Secretaries</td>
<td>23,479</td>
<td>31,435.35</td>
<td>- 7,956.35</td>
</tr>
<tr>
<td>Driver</td>
<td>15,126</td>
<td>10,268</td>
<td>+ 4,858</td>
</tr>
<tr>
<td>Info Campaign Specialist</td>
<td>80,784</td>
<td>89,427</td>
<td>- 8,643</td>
</tr>
</tbody>
</table>

Total salaries charged and salaries paid by IOM almost match, the difference is of minor character - less than 1,000 EUR. What concerns us is the fact that the international specialist, IOM international staff member, was recruited by the project although this was against the conditions set forth in the financing contract. And yet, IOM has charged her salaries to the project for 13 months (from 09 Dec 2004 until 08 Dec 2005).
From the background material we assume that IOM has not been willing to accept the donor request of limiting the number of international long-term staff members to one. It is also interesting that diplomatic discussions with official letters have been continued for several months although the breach of agreement is obvious.

IOM wants to emphasize that the post of “Information Campaign Specialist comes under the operations budget that has been envisaged for that position. The exchange of letters between IOM and MFA are fully in agreement with this.” And further “the post of the Information Campaign specialist was part and parcel of the original budget, under the operational part of the project, from where the salary came from. The International staff member concerned here has worked full time for this project with that title”.

The salary levels of project assistants vary and the newest one scores for the highest salary; but an exceptionally big gap there is among the secretaries. The most recently recruited clerk is paid three times higher salary than all her ex or current colleagues are paid. This makes one only wonder if disbursement pressure could explain this. In theory the IOM practice of issuing and extending contracts every 6 months might clarify the issue. In these cases the person has been a new staff member to this project. We are not talking about work contracts but duration, time allocation and salary rate charged to this project.

Two external long-term consultants and two short-term consultants have been employed with the project funds. Long-term specialists’ expertise assessed by their Curriculum Vita and by satisfaction of the interviewed persons seems of high quality.

For project activities IOM has recruited 44 trainers and altogether 42 interpreters and translators with separate contracts. Trainers were not identified by name due to limited time resources in the field mission but according to our knowledge both international and local trainers have been contracted. IOM staff members from other field missions have also worked as trainers in the project. An international trainer has been paid a daily fee of 500 EUR per training day (includes preparation). The daily fee for a local trainer is up to 150 EUR. For a presentation the IOM has paid 50 EUR and for a half day (max 3 hours) 75 EUR for local trainers.

The fee level for local trainers is extremely high when compared to the salary level of civil servants. A senior ministry officer’s monthly salary is around 200-300 EUR. It is clear that international organisations are enhancing the segregation of the society by high salaries and furthermore with salary toppings. We do not welcome this manner of paying salaries for local trainers, often civil servants working as trainers in subjects and topics that are part of their own duties.

What comes to the daily fee of interpreters, the gap between the common fee level and IOM paid level is huge. In Kosovo other Finnish funded projects pay 35 EUR for a competent interpreter working with them on a regular basis. For short-term assignments the daily fee varies between 50 – 55 EUR according to the information by IOM. With this project the interpreter receives 100 EUR per day. This practice is truly unsustainable and can only be explained by the difficulties in allocating the funds to project implementation. On the other hand, IOM commented this by referring to the local market rates for interpreters serving international organisations such as UN, based on information and offers collected.
11.3 Interest

The disbursement schedule is also interesting. MFA has disbursed funds to IOM and expenditures reported by IOM as follows:

<table>
<thead>
<tr>
<th>Time of disbursement</th>
<th>Amount in EURO</th>
<th>Total Cumulative Expenditure EURO / by date</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 2004</td>
<td>1,000,000</td>
<td>17,747 / December 2004</td>
</tr>
<tr>
<td>May 2006</td>
<td>500,000</td>
<td>266,139 / June 2005</td>
</tr>
<tr>
<td>September 2006</td>
<td>300,000</td>
<td>859,395 / December 2005</td>
</tr>
<tr>
<td>TOTAL</td>
<td>1,800,000</td>
<td>1,342,191 / June 2006</td>
</tr>
</tbody>
</table>

The slow start of the project and ineffective implementation in that sense that expected operations have not been undertaken in the planned time schedule means that project funds have been in Swiss bank account for several months. We do understand that imposing and pushing with project activities leads to no good if the local stakeholders are not committed and motivated in the work. What we do not quite understand is the contract between MFA and IOM which does not stipulate that interest income to be credited to the project, although this is the standard request in MFA bilateral funding, and also an IOM practice.

11.4 Conclusions

In our opinion this project with total funding of 2.5 million EUR would have needed better structured and more specific budget, highlighting the allocations between 1) working months and days and specifying all the recruited persons by name, 2) direct operational costs and 3) reimbursable costs (that are charged against supporting documents) under each component with more detailed information. In financial reporting it is also a good practice to specify the unit, unit rates and number of units covered by project funds. When screening the other projects IOM Kosovo has undertaken there is no counter trafficking project with such a big budget as this project. The inexperience in managing such large funds is reflected in inappropriate budgeting and fund allocation procedures.

The project budget is too vague with lump sum reporting to analyse cost-effectiveness from the financial reports produced by IOM to the donor. Also the data gathered during the field mission does not cover the whole budget to draw conclusions on fund allocation from June to October 2006. The only conclusions that can be drawn concern the salaries and fees, overheads and interest.

IOM staff salaries have not been charged according to the salaries and projectization sheets which ought to provide the evidence of work time allocation for different projects. Annex 5 includes the information of project staff salaries in EUR and projectization of work time in per cents. If the salaries are compared to the salaries charged from the project differences are many. There are both under- and overcharges varying by person and month. Altogether it seems that with these practices IOM has tried to cover the salary costs accrued from the international staff member that was not supposed to be working in this project.

The salaries of the most recent recruitments are not in line with the previous contracts. It is obscure that these contracts are brand new, made in October 2006 although the no-cost extension is coming to an end in December 2006. Fee level both for local trainers and interpreters is high. We think it has been inconsiderate to go for fee levels that clearly exceed the local average which IOM must be aware of. However, we must acknowledge that the fee levels are comparable to those commonly used by other international agencies in Kosovo and Macedonia.
IOM commented several issues of the draft evaluation report by saying that clarification and explanation and further information could be provided. However, the additional information and comments that were provided by IOM did not clarify most of the issues.

IOM headquarter audits do not meet the needs of MFA hence project specific audits would be required. Although the IOM and MFA agreement states that IOM’s regular external annual audits are sufficient (and that original invoices, receipts and other acknowledgements or proof of payments shall be available for inspection and review by the Donor upon request), the evaluation team is of the opinion that the scope and purpose of those audits is different. The audits do not address any of the aspects that are particularly relevant to the project’s financial management.

IOM has overcharged management overheads to this project and should return the funds.

**11.5 Recommendation**

Donor reports are the responsibility the IOM project manager. The IOM accounting system also advises that budgets should be based on IOM account lines. Yet, reports to donors should be based on specific requirements of each donor. Therefore we recommended that if any extension of the contract is considered a detailed budget should be prepared for the extension period in a format that is mutually acceptable and understood by MFA and IOM.
12. Other counter trafficking projects implemented by IOM in the region

There are numerous international donors and organisations involved in counter trafficking activities in the region. In the discussions with other international actors, such as Sida, USAID, Dutch, OSCE, UNICEF, UNDP and UNHCR, overlapping and the duplication of the anti-trafficking activities turned out apparent. While comparing the Finnish funded project to the other projects, it is, however, notable that funding of this very project has been significantly bigger. In addition, many of these projects have focused on the same issues: awareness raising campaigns and capacity building activities for NGOs and law enforcement activities have been central in all IOM implemented projects.

There are many players in the Western Balkans but unfortunately the international donor community has not been able to channel financing support through joint financing arrangements for combating trafficking. The donor community has gained experience in isolated efforts and separate project funding and there is evidence enough to say that this approach has led to no promising effects and impacts. We guess this perception is widely shared. There are only weak signals of interest towards harmonised and coordinated cooperation among the donors. This leaves space for NGOs, international NGOs and international organisations to continue with isolated projects. IOM Kosovo has applied funding from the Dutch government for a separate 24-month project in Kosovo\(^1\) and funding from Sida to continue the regional programme\(^2\).

The following two tables list the counter trafficking projects conducted by IOM Kosovo and IOM Skopje.

### IOM Kosovo

<table>
<thead>
<tr>
<th>Project</th>
<th>Donor</th>
<th>Time schedule</th>
<th>Total budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measures to counteract trafficking in human beings, particularly women and minors, from/via South Eastern Europe</td>
<td>Government of Italy</td>
<td>Jan 2004-May 2005</td>
<td>EUR 100,000</td>
</tr>
<tr>
<td>Measures to support trans-national cooperation to prevent and combat trafficking and irregular migration</td>
<td>Government of Italy</td>
<td>Dec 2005-Nov 2006</td>
<td>EUR 25,000</td>
</tr>
<tr>
<td>Reintegration programme for Kosovar victims of trafficking, particularly women and children</td>
<td>USAID</td>
<td>Oct 2003-Mar 2006</td>
<td>USD 518,804</td>
</tr>
<tr>
<td>Support to regional policies for combating trafficking in women</td>
<td>Greece</td>
<td>starting (12-month project)</td>
<td>EUR 37,556</td>
</tr>
<tr>
<td>Development of reliable and functioning policing systems and enhancement of combating main criminal activities and police cooperation</td>
<td>Commission of the European Union</td>
<td>Mar 2004-Sep 2006</td>
<td>EUR 80,000</td>
</tr>
<tr>
<td>Combating trafficking in human beings in South East Europe and Balkan region</td>
<td>Sida, Sweden</td>
<td>Jan 2005-Dec 2006</td>
<td>USD 2,160,000 of which 204,917 USD for Kosovo</td>
</tr>
</tbody>
</table>

\(^1\) IOM Draft Concept Paper: Reinforcing Counter-Trafficking Capacity Building, Prevention and Reintegration Activities, 2006.
<table>
<thead>
<tr>
<th>Project</th>
<th>Donor</th>
<th>Time schedule</th>
<th>Total budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decentralized counter trafficking institutional and civil society capacity building in the Republic of Macedonia</td>
<td>Norway</td>
<td>Jan-Dec 2004</td>
<td>EUR 79,002</td>
</tr>
<tr>
<td>Programme of assistance for protection, return and reintegration of trafficked women and children in FYR Macedonia</td>
<td>Norway</td>
<td>Apr 2005-Dec 2006</td>
<td>EUR 124,384</td>
</tr>
<tr>
<td>Preventing irregular migration in Roma communities through vocational training activities</td>
<td>Norway</td>
<td>May 2006- Jun 2007</td>
<td>EUR 125,000</td>
</tr>
<tr>
<td>Capacity building for lawyers and postgraduate students on human trafficking</td>
<td>Norway</td>
<td>May 2006- Jan 2007</td>
<td>EUR 62,483</td>
</tr>
<tr>
<td>Fostering the regional network of prosecutorial structures in Macedonia, Albania, Serbia and Montenegro for enhanced cooperation in the fight against human trafficking and smuggling</td>
<td>Norway</td>
<td>Jun 2006-May 2007</td>
<td></td>
</tr>
<tr>
<td>Economic and social stabilization programme for potential victims of trafficking in the border regions of FYR Macedonia</td>
<td>Norway together with Council of Europe (Development Bank)</td>
<td>Oct 2005-Dec 2006</td>
<td>EUR 250,000</td>
</tr>
<tr>
<td>Capacity building on counter trafficking training program for the members of judiciary and the students of law</td>
<td>Switzerland</td>
<td>Jan-Dec 2005</td>
<td>EUR 109,030</td>
</tr>
<tr>
<td>Combating trafficking in human beings in South East Europe and Balkan region</td>
<td>Sida, Sweden</td>
<td>Jan 2005-Dec 2006</td>
<td>USD 2,160,000 of which USD 125,878 for F.Y.R. of Macedonia</td>
</tr>
<tr>
<td>Measures to counteract trafficking in human beings in particular women and minors from/via the Balkans and Adriatic region</td>
<td>Italy</td>
<td>Jan 2003-Dec 2006</td>
<td>EUR 45,000</td>
</tr>
<tr>
<td>Development of reliable and functioning policing systems and enhancing of combating main criminal activities and police cooperation</td>
<td>Commission of the European Union</td>
<td>Mar 2004-Sept 2006</td>
<td>USD 27,408</td>
</tr>
<tr>
<td>Prevention of trafficking in human beings in the western Balkans through educational activities and capacity building of school</td>
<td>The Netherlands</td>
<td>Nov 2004-Sept 2006</td>
<td>total EUR 899,852 of which EUR 131,890 for F.Y.R. of Macedonia</td>
</tr>
</tbody>
</table>

In 2000s efforts to combat trafficking have increased substantially in the region after the Stability Pact Task Force on Trafficking in Human Beings was created and Palermo Trafficking Protocol was adopted. Most bilateral donor agencies are supporting financially counter trafficking activities. Funds allocated to the Western Balkans are ODA eligible and yet, it is told that donor coordination is missing due to problems of merely budgetary techniques. Funds are sourced from political or regional funds e.g. and not from the development aid funds. It is a pity that the donor community is not willing to learn from their own experiences in other regions and countries. The donor harmonisation, coordination, cooperation and coherence would be necessary especially in Kosovo and in Macedonia as well.
The links and continuum of relief, rehabilitation and development are crucial. In Kosovo it is only six years that the war ended and the society and population are facing big problems. Trafficking is not the only problem. As we know development is a complex process. It requires state support and coordination, continuously over decades. Effective and sustainable counter trafficking policies and action are linked with development of rule of law and other societal, judicial and financial reform processes.

Instead of fragmenting its important work into small projects and investing time and energy in managing a large project portfolio, IOM could introduce better example and come out with a counter trafficking programme and establish a joint funding mechanism for facilitating the national action plans to be implemented with strategic goal at combating trafficking.
13. Conclusions

As trafficking in human beings is a complicated and many-faceted problem, combating trafficking is difficult in all circumstances. Trafficking should not be treated as an isolated problem but instead it should be dealt with in the given social and economic context, taking into account its trans-national dimensions. Therefore, it is of paramount importance to connect counter trafficking efforts with the development of rule of law and economic stabilisation.

It is obvious that the need to counteract trafficking was initiated by the international community. Therefore, it might be appropriate to question the existing political will both in Kosovo and Macedonia especially when counter trafficking work are heretofore largely funded by international donors. In post-conflict situation of Kosovo the links between the relief, rehabilitation and development are of key importance also what comes to successful combating of trafficking. Fight against trafficking must be combined also with fight against organised crime and corruption which are serious problems in Kosovo and Macedonia.

Although preventing trafficking should be admitted a great role in all anti-trafficking activities, it is argued that prevention activities in the region in general are afforded too much attention at the cost of other approaches, most importantly victim-centred, long-term and sustainable victim assistance and protection strategies.

Macedonia is eager to join the European Union as soon as possible and therefore willing to approximate and harmonise its legislation and adopt other measures. It is however, as important to ensure that environment for anti-trafficking activities is supportive for example by providing funds for NGOs and other actors to implement legislative and other concrete measures.

Governments’ ability to face economical responsibilities arising from different counter trafficking efforts should be strengthened. Therefore, IOM needs to ensure that the basis is solid for the future of anti-trafficking activities. This should be seriously considered already when planning project approach.

The role of NGOs is of great importance in counter trafficking work as well in the Western Balkans as it is in the EU countries. As victims of trafficking do not often trust on authorities, NGOs might appear or be more attractive channel to seek assistance and help. In addition, NGOs often seem to have more knowledge and capacity to tackle trafficking than the governmental authorities. There is, however, a risk that NGOs are accorded the responsibilities that should be taken care of by governmental bodies. Eventually, NGOs begin to replace the government rather than fill in the gaps in anti-trafficking, which is an unintended negative impact.

This project has invested lot of money and time for public information campaigns. Information campaigns have been criticized for being an ineffective way to prevent trafficking especially in conditions of economic distress and lack of rule of law. We regard that empowering vulnerable groups to trafficking, for example through micro-business grants, would be more effective and sustainable way of preventing trafficking. Encouraging individual strategies for empowerment by strengthening economic independency and promoting professional capacities is one good way to apply victim centred approach. On the other hand, people should be empowered by providing information on migrants’ rights as well as on possibilities and options for safe migration.

The impact of the awareness raising campaigns is difficult to assess and especially so in Kosovo due to the fact the several campaigns have been organised by various actors in recent years. Furthermore, it can be stated that the cost-efficiency of the public information campaigns is questionable if compared to other similar kind of campaigns in the region. Info campaign is the easiest way for donors and implementing actors to fund NGOs. It is much more demanding and time-consuming to build functional structures and strengthen institutional mechanisms in cooperation with the government.
The coordination and cooperation between the international donors could be improved. Joint-funding mechanisms and more harmonised procedures as such might be in place there.

Capacity building needs are evident in the region. This project has invested a lot in producing training materials and manuals and in organising training at operational level. Of course manuals could be improved. The follow-up approach with a mini-project is promising and we believe that the best practices and far reaching positive impact can be found there. Also the most vulnerable groups to trafficking have been reached.

However, capacity building of governmental authorities has not involved enough emphasis on trainer training and institutional strengthening. This is an inefficient and unsustainable way to carry out capacity building. Moreover, training needs should have been identified in a more measured and detailed way for each group of training participants. In addition, some monitoring activities and reporting on training results and effects should have been incorporated in the work.

Support to the help lines is questionable. Various international donors fund these activities and we are not aware of the shares of their funding. Help lines need to be strongly incorporated into the referral systems. The possible gaps between help lines and referral systems providing services for the victims of trafficking should be filled in order to avoid the victim to fall outside the system. Furthermore, funding of the help lines should be secured by the governments without external financial contribution to ensure the continuity of the service. Telephone help lines established only for a year or two is not reasonable. Therefore, IOM needs to ensure that the basis is solid for the future of this kind of help lines after the project has ended. This should be seriously considered already when planning the project approach.

It is surprising that IOM has not examined critically the aims and intended impacts of the project. Critical self-assessment could have redirected the action and thus resulted in modification of the project approach. It might have assisted the project to adopt more relevant ways of implementation. As an overall view the expertise and experience in counter trafficking of the project staff are profound, whereas the project management skills and experience are rather weak. The implementation for so far has been very labour intensive.

Project management including the planning, monitoring and reporting as well as financial administration is not of the best quality. Project plans do not include information on the intended results and specified beneficiary groups, on project staff being responsible for the component nor any milestones for work. Reports are heavy and focusing only on activities undertaken. Financial reporting has not been accurate and IOM has overcharged management overheads. It remains open if there are overcharges also in the salaries.

IOM is implementing the project in a manner that resembles core funding from the MFA, not project funding. When taking a closer look at the projects financed by the international donor community and implemented by the IOM common elements with the Finnish funded project are many. IOM is working in capacity building, and training has been organised rather at operational level (social workers, teachers, policemen, NGO workers) than at institutional level with focus on trainer training. The main difference is in the budget which is much higher in this project than in any other IOM implemented project in Kosovo or Macedonia during past five years. Most of the other counter trafficking projects implemented by IOM Kosovo and Macedonia have total budgets that are smaller than the share of the mission support costs and office costs alone of this Finnish funded project. The disbursement pressure has led to unsustainable practices. The local absorption capacity is weak and local contributions are lacking. We do not regard a no-cost extension based on the current budget and updated work plans feasible, relevant nor sustainable. However, we appreciate the IOM work in the Western Balkans and believe that Finland should continue supporting the IOM counter trafficking project after certain corrective measures have been taken.
14. Recommendations

We recommend that Ministry for Foreign Affairs will continue financing Counter Trafficking project in Kosovo (Serbia) and F.Y.R. Macedonia implementing agency being the IOM.

We recommend an extension and a contract for one year with special focus on the following issues:

Project / Program management structure
- Composition of the Steering Committee and the Supervisory Board should be reformed so that all key stakeholder groups are represented. Especially the Ministries of Justice should be included in the management groups of the project. It is also necessary to clarify the roles in the management structure and ensure that same persons are not members in both groups.

Objective-oriented planning and reporting
- IOM should draft an objective-oriented plan indicating results to be achieved, by whom and by which time.
- A detailed budget is needed for the extension period, emphasising sustainability in the exit strategy. If no joint financing arrangements can be developed, at least program approach with earmarked contributions should be applied.
- The plan should include an inception phase of one month to achieve the above mentioned tasks.
- Reporting should focus on results and outcomes by the project as well as signals for potential impacts.

Awareness raising
- Mini-projects at the local level are warmly recommended with focus on children, drop outs and youth or other groups at high risk for trafficking. These groups can be further specified by IOM together with local stakeholders.
- Mini-projects should be initiated and developed together with local actors, be limited and well targeted in scope, apply participatory approach in implementation and disseminate the lessons learnt and best practices.

Capacity building
- Capacity building activities should be directed to governmental authorities.
- Special emphasis should be given on trainer training and institutionalisation of the training; it is of primary importance to identify competent trainers.
- Trainers from governmental bodies should not be paid salary topping.
- Ministry of Justice staff, including prosecutors and judges, should be included in the training activities.
- Training activities that are based on training needs analysis, modules tailored according to the learners and applying adult learning oriented methods are highly recommended.

Referral system, help lines and NGO networking
- Before additional funding is provided to the help lines in both Kosovo and Macedonia, the funding amounts from other donors should be verified to find out the actual needs of the help lines, i.e. if additional funding is necessary. This should be clarified during the inception phase.
- It is crucial that help lines are included in the national referral mechanisms.
- Governments’ ability to face economical responsibilities arising from different counter trafficking efforts should be strengthened. A solid basis for the future of the help lines and referral systems in both Kosovo and Macedonia should be ensured.
- Issuing micro economic empowerment grants for women should continue. This kind of empowering activities, which aim at long-term prevention of trafficking, should be further developed.
Cooperation and coordination between NGOs is highly appreciated. NGO networks already exist in Kosovo and Macedonia, but the project should facilitate strengthening their network structure and co-operation modes and coordination of counter-trafficking work.

Project funded offices are neither institutionally nor financially sustainable. Therefore, funding for the National coordinator’s office in Kosovo should be discontinued to ensure institutional strengthening. In Macedonia, the establishment of an office for the National Commission should not be funded.

Financial administration and management
- IOM should return the overcharged management overhead as well as the expenditure allocated for the second international IOM staff member and re-allocate these funds to implement this project.
- There is a need for a new budget structure specifying unit, unit rate and number of unit for each budget line.
- Personnel should be specified by name in each budget line.
- The same structure should be applied systematically in reporting the expenditures (financial reporting).

Ministry for Foreign Affairs
- In the new agreement clauses concerning the financial reporting and interest calculation should be stipulated.
- Responsibilities between the MFA and the Liaison office in Kosovo should be clarified: the Liaison office should represent the donor in the Steering Committee and the Ministry in the Supervisory Board.
Annex 1.

MINISTRY FOR FOREIGN AFFAIRS
Unit for Western Balkans

COUNTER TRAFFICKING: PREVENTION AND CAPACITY BUILDING ACTIVITIES IN KOSOVO (SERBIA AND MONTENEGRO) AND F.Y.R. OF MACEDONIA

TERMS OF REFERENCE FOR AN EVALUATION 20.9.2006

1. Subject of the evaluation

1.1. History of the programme “Counter Trafficking: prevention and capacity building activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia

Trafficking in human beings is a serious human rights problem in the Western Balkan countries and it affects especially lives of women and children in the poorest parts of the region. Many donors have supported different counter trafficking activities in the region.

The Finnish funded counter trafficking programme in Kosovo and Macedonia is implemented by International Organization for Migration (IOM). The responsibility for the implementation of the programme lies with the Mission of IOM in Pristina and Skopje. The programme proposal of IOM was approved by the Ministry for Foreign Affairs of Finland, and the agreement on the programme was signed between the Ministry and IOM in 2004. The planned duration was from 01 July 2004 to 30 June 2005, but as the actual implementation started only in December 2004, the Supervisory Board of the programme approved a no cost extension until December 2006.

1.2. The Objectives, Purpose, Activities and Expected results of the Programme

The objective of the programme is
- building of a regional effort to combat trafficking in human beings to, from and via Balkans and neighbouring countries
- building of regional capacity to combat trafficking, through the strengthening of government and relevant authorities in taking appropriate counter trafficking measures at a policy level, while supporting the establishment of an assistance and advocacy NGO infrastructure
- improved capacity of law enforcement entities to combat trafficking in human beings

The purposes of the programme are
- To establish a functional Government and NGO infrastructure capable of raising awareness on the issue, promoting counter trafficking prevention activities, and building upon existing referral structures in order to create an assistance network, both at country/region levels as well as regionally.
- To facilitate and build regional NGO network and to strengthen the linkage between national and regional institutions and NGOs, thus raising awareness on the trafficking issue at the regional level.
- To effectively train the Law Enforcement personnel from all participating countries in knowledge, measures and procedures of effective preventive border management, including the prevention of document fraud, use of border management equipment and language training, based on the National Governments’ strategies and International/EU standards.

According to the original proposal “The counter trafficking programme aims at contributing to the efforts of the civil society and the Government in the region focusing on the prevention of trafficking by raising awareness through information campaigns and by building capacity through training
activities. In concrete terms, this project intends to address four integrated and interrelated aspects: A) Information to the public and Awareness raising campaigns on the phenomenon of trafficking; B) Capacity building and empowerment of local partners, including advocacy and human resource development - Governmental and Non Governmental Organisations in producing information campaigns and prevention based projects; C) Technical management and capacity building of an assistance network in the region and enhancement of a service referral system for vulnerable groups targeting Governmental and Non Governmental actors; and D) Capacity building through awareness raising and targeted training of Law Enforcement Authorities, including Border Police and Customs as well as Military Personnel, on gender issues and human rights with particular focus on counter-trafficking, as well as on effective preventative border management, including counter-trafficking awareness, detection of document fraud, proper use of technical equipment and foreign language training.

2. Objective of the Evaluation

In the Project Document the Mid-Term Review has been scheduled to be carried out in 18 months from the beginning of the project, if a decision of no-cost extension of the project will be made. In the case that the project will last the planned two years, an evaluation was supposed to be conducted at the end of the project. The project is now actually at the end, but there is still money left. The IOM is proposing a no cost extension until 30 June 2007. The Finnish side has proposed to carry out an evaluation of the project in order to get information for decision-making. The objective of the evaluation is to evaluate the relevance of the project and give guidance to the Finnish side, whether to reject the no cost extension or accept it, possibly with changes in the project document and/or work plan.

The general objective of the evaluation of the project is to enable the competent authorities of the Government of Finland to evaluate whether the chosen approaches are sound and sustainable and whether the resources made available to the Project are being used in an appropriate and efficient way. The purpose of the evaluation is:

2.1. Relevance and Impact assessment: Assess the extent of achievement of the objectives, purpose and expected results of the Project, and the constraints experienced during the implementation. How well the project has managed to meet the needs of local beneficiaries (victims of trafficking, local authorities and civil society)? Ability to focus on relevant and feasible priorities as a part of project implementation.

2.2. Management and transparency: Assessment of the function of administration and decision-making. Working relations and administrative/financial transparency between the IOM staff, local actors and donors.

2.3. Sustainability: Analyse the prospects of sustainability for the remaining Project period, and after phasing out of the donor funding in December 2006/June 2007. Using and strengthening of local capacities replacing gradually the international component.

2.4. Extension or complete: The purpose of the evaluation is also to provide guidelines whether to complete the project in the end of 2006 or extend it till the end of June 2007- in the case of possible extension of the project, guidelines for reorientation and prioritising activities are expected to be provided. Which facts support/do not support the extension of the project until June 2007?

The results of the evaluation will be discussed and necessary decisions will be made in the next Supervisory Board meeting tentatively scheduled for December 2006.
3. Evaluation issues

General Issues

The evaluation shall assess the general relevance, effectiveness, efficiency and impact of the present project, to the extent possible. It shall also assess to what extent the benefits of the project are likely to be sustainable in the medium and long term. The following sustainability factors shall be considered in the analysis: policy environment, financial sustainability, institutional sustainability, socio-cultural aspects, participation and ownership, gender issues, environmental impacts, and appropriateness of technology, as specified in the Guidelines for Programme Design, Monitoring and Evaluation of the Ministry for Foreign Affairs of Finland (2000).

In the case the evaluation team recommends the extension of the project until June 2007, changes and revisions in the Project approaches and priority activities shall be proposed, as necessary to ensure achievement of objectives and sustainability of results and to minimise possible remaining risks.

More specifically, the analysis should address (but not necessarily be limited to) the issues described in the following chapters.

Compatibility of the Project vis-a-vis the principles of Finnish Development Co-operation

The mission should assess how the goals of the Finnish development co-operation policy (poverty reduction, alleviation of environmental problems and promotion of human rights, gender equality, the rights of the children, minorities and most vulnerable groups, good governance and democracy) have been taken into account in the planning and implementation of the Project? In other words, how are the rights and capabilities of the poor promoted in the Project? How has the protection of environment been taken into consideration? How are equality, human rights and democracy promoted in the Project?

Relevance and Validity of the Project Objectives and Implementation Strategy

The mission should evaluate the relevance of the Project, i.e. whether it makes sense with the context of its environment and in relation to the priority needs of the beneficiaries and stakeholders of the Project. The following questions clarify this further:
- Are the Project objectives, expected results, approach and scope still valid and relevant?
- Have the needs and aspirations of the relevant actors of the Project been taken into consideration when planning the Project activities?
- Are the various stakeholders and interest groups satisfied with the Project objectives?

Effectiveness

The evaluation should assess the effectiveness of the Project, i.e. whether there has been a change towards the achievement of the overall (long term) objective of the Project as a consequence of the achievement of the Project purpose.

This needs to be done from the point of view of the immediate beneficiaries and target groups of the Project. These are:
- Non Governmental Organisations (NGOs) dealing with issues gender, human rights with specific focus on trafficking in human beings
- Governmental bodies dealing with issues of migration, gender, human rights and organised crime, including trafficking in human beings; in particular the Ministry of Interior, the Ministry of Labour and Social Welfare, the Ministry of Health and Education,
- Relevant representatives of law enforcement entities (Specialised Police Unit to counteract...
Trafficking, Border Police, Customs Police and Military Personnel)
- Potential victims of migrant trafficking in communities identified as vulnerable to the exploitation by traffickers;
- Youth population between the ages of 16 and 30
- Clients and potential clients, through the information campaign;
- General public
- International Organisations and UN agencies

Which factors have facilitated or impeded the progress of the project in achieving the intended objectives, results and impacts? What are the major obstacles in reaching the objectives and why, if any?

Are the various beneficiaries and other interest groups satisfied with the project progress and achievements?

If there are any external factors, which have had influence on these changes, such as changes in government policies, interventions of other donors etc., these should be mentioned and their influence clarified.

Impact

The impact assessment needs to be carried out from the point of view of the final beneficiaries and target groups (primary beneficiaries) and/or other affected groups taking into account e.g. the socio-cultural, socio-economic and environmental impacts. This can be done by answering the questions: what have been or are likely to be, the positive or negative, intended or unintended impacts of the intervention on, e.g.: situation with trafficking in human beings in general in the region, situation of the victims of trafficking, level of public awareness of trafficking in human beings, capacity to combat trafficking on national and regional level, establishment of an assistance and advocacy NGO infrastructure

The review shall also analyse how the various stakeholder groups perceive the Project impacts and whether the impacts have caused, or are likely to cause, conflict between the various groups.

Efficiency

The evaluation should assess how cost-effectively the means have been converted into results. The following questions will aid the assessment:
- Do the quantity and quality of the results of the project justify the quantity and quality of the means and resources used for achieving them?
- Have the local and external human, material and financial resources which have been made available for the Project been appropriate in terms of quantity and quality? Have time and resources been allocated to the various Project components and activities in a planned, balanced and justified manner?
- To what extent has the Project implemented the activities planned in the Project Document, overall work plan and annual work plans and as decided in the meetings of the Steering Committee and/or the Supervisory Board? Have the possible deviations been justified?

Sustainability of Results and Benefits

The evaluation shall estimate the Project sustainability, that is: what is likely to happen to the positive effects of the intervention after the external assistance has come to an end, and whether the other possible project impacts are "sustainable"? The following questions are given as guidance:
- Policy environment: Has the Project been in line with the partner countries' policy environment,
and has this turn been conducive to the Project's objectives?

-Economic and financial sustainability: Will the host organisations be able to finance the developed structures and activities after the project has ended? Have the necessary economic instruments and financial mechanisms been adequately planned, developed and used?

-Institutional sustainability: To what extent are the project approach and activities in line with the existing legislation, administrative structures and procedures in the local circumstances? Are the project approach and activities sufficiently supported by laws, regulations and institutional arrangements of the partner countries? Has the institutional capacity of the partner countries and the participating institutes enabled them to manage the project efficiently? Has the institutional capacity been strengthened to promote the sustainability of the results? Has technology, skills and know-how been transferred to the counterparts and other beneficiaries in a sustainable way? Sustainability (permanence) of the training systems? Have the expected results been originally tailored to be in line with the existing human and financial resources of the host organisations? Are the experience and "lessons learned" being disseminated effectively in order to encourage replication of similar activities in other parts of the countries? Is the project (likely to be) replicable? Is any replication known to have occurred already?

-Socio-cultural aspects: Have the socio-cultural factors taken into account to mobilise and commit the stakeholders to the project? Has the culture-related habits, protocols and traditions been taken into account when approaching the stakeholders? Are the socio-cultural impacts of the Project acceptable to the affected groups?

-Participation and ownership: What is the degree of "ownership" of the host organisations in the Project? Who has had the power and control over the Project decisions and who has participated in decision-making? Has this been adequate regarding equality and transparency? Has the Project used the existing local capacities in training and short term consultancies? Are the various stakeholders and interest groups satisfied with the Project objectives, approach, content and achievements?

-Gender: Have the different needs and roles of both women and men been fully recognised in the planning and in the implementation? How has the Project affected the relations between men and women in the participating institutions and organisations as well as the beneficiary groups? Has the Project had a differential approach towards men and women groups? Have the gender issues been identified in a comprehensive way, looking at equality of both women and men?

-Appropriate technology: Has the technology used been compatible with the available human and financial resources and is it socially acceptable? Is the equipment used possible to maintain with services available locally? Is the price level of the equipment such that it can be bought by the recipient organisation with its own funding? Is the technology unnecessarily sophisticated or unnecessarily simple in relation to carrying out the work?

-Environmental sustainability if any obvious effects can be identified.

As a conclusion, the evaluation should answer the following questions:

- Which are the key factors ensuring or endangering the sustainability of the results of the project? What are the main risks in terms of sustainability? What should be done in order to minimise the sustainability risks?

Performance of the Project Organisation:

- Has the Project been methodologically and functionally effective in the planning and prioritisation of activities, operational and financial management, implementation, supervision, monitoring, quality assurance and reporting? Is there clarity and effectiveness of the planning and decision-making procedures?
- Have the mandates, roles, responsibilities, relationships and communication mechanisms of the Project personnel and the decision-making organisations been clearly defined and well established in practice?
- Has the Project personnel been able to provide the services and carry out their tasks as expected? Are the mandates and tasks of the Project personnel still relevant or are there needs for revising them (this needs to be clarified, if the evaluation team recommends to extend the Project until June 2007?)

- How effectively has the inter-agency co-operation and co-ordination (the project, other relevant projects/programmes, national, regional and local governmental and non-governmental stakeholders, the Ministry for Foreign Affairs of Finland and other donor agencies) and stakeholder participation functioned in the Project planning, implementation and monitoring processes?

- Has local and international expertise been utilised in a balanced and justified manner?
- Have the procedures and practices used in recruiting short-term local and international consultants and procurement of equipment and other material been clear, transparent and acceptable?

Quality of Products

- Have the tangible products of the Project been professionally, technically and scientifically of good quality?
- Have the tangible products of the Project been effectively utilised by the intended beneficiaries?

4. Methodology and Timing

The Evaluation Mission will include both desk work and a field trip to Kosovo and Macedonia. The evaluators will be responsible for designing an appropriate methodology for the evaluation. They will collect data, analyse it, make conclusions and recommendations. In the report use of tables is a recommendable tool to summarise findings, for making comparisons and for illustrating, for example, the new orientation needed as compared with the prevalent situation.

The timing:
Familiarisation with documentation
Preparation of the methodology and field trip
Briefing in MFA 3 days

Field trip to Kosovo and Macedonia 10 days (including briefing in the beginning and debriefing at the end)

Draft report writing and debriefing in MFA 3 days (draft report circulated for comments (2 weeks))

Finalisation of the report 1 day

The field trip to Kosovo and Macedonia should be conducted during October or the first days of November 2006 and the draft report should be left for comments before November 10th. The comments on the draft report should be given by November 24th. The final report shall be submitted by November 30th.

5. Budget
The maximum budget shall not exceed 30000 euros, including consultancy fees up to a maximum of 22000 euros equal to 34 working days.
6. The evaluation team

The evaluation team will consist of the team leader and one team member. One of the team members should be an expert in human rights issues and the other should have sound experience in development cooperation and project management issues.

7. Mandate

The evaluation team is authorised to discuss with any party relevant to the project implementation. Yet, the team is not entitled to make any statements or commitments on behalf of the governments of Finland, Kosovo, Macedonia or UNMIK.

Helsinki 16.10.2006

Juha Ottman
Director
Annex 2. Work Plan
Proposal submitted to Ministry for Foreign Affairs on 12 October 2006

1. Background

Finnish Ministry for Foreign Affairs / Unit for West Balkan (EUR-15) has supported the IOM project Counter Trafficking: Prevention and Capacity Building Activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia with € 2.5 million. The project was initially planned for the period July 2004 – June 2006 but due to delays the implementation started in December 2004.

The objective of the evaluation is to evaluate the relevance of the project and give guidance to the Finnish side, whether to reject the no cost extension or accept it, possibly with changes in the project document and/or work plan.

According to the Terms of Reference (20.9.2006 / EUR-15) the purpose of the evaluation is to assess:

1. Effectiveness and relevance: have the intended results and objectives been achieved? Beneficiary satisfaction? Feasibility and relevance: in terms does the approach and work done make sense in this context, especially in light of legislation, human rights, status of international agreements?
2. Management and transparency (decision making, financing administration, IOM vis-a-vis local actors and donors)
3. Sustainability: prospects of the work? Exit strategy for Finnish support? Important here is not only financial sustainability, but institutional, socio-cultural and foremost political sustainability.

The evaluation is to recommend whether the Finnish funding should be completed in December 2006 or extended until June 2007.

The TOR as well as the Second annual report to the Government of Finland state that many donors are funding similar projects in the area. However, there is no specification of who they are, since when they have been working, on what they focus and especially how this IOM Project contributes to the previous and existing development efforts.

2. Approach and work plan

The evaluation will be executed following the DAC evaluation criteria and assessing the work done against the project plan and intended results. The evaluation team will not limit its focus on aspects identified in this proposal but intends to create an overall view on the current situation.

Collection and analysis of background material in the MFA will lay down the basis for the evaluation. Of special interest is the following information:

- application and financing decision procedures in the MFA
- problems encountered and risks foreseen initially and during the implementation
- monitoring activities of the MFA and Embassy and their findings, including records of the Steering Committee and Supervisory Board meetings
- Finnish policy priorities and goals (Government Resolution on Development Policy of 2004, Support for International Non-Governmental Organizations of 2006 and National Plan of Action Against Trafficking in Human Beings of 2005)
Analysis of results-based management in the IOM reflects the plans and will be carried out by interviewing different stakeholder groups in Kosovo and Macedonia. The agenda for the field mission relies on very limited information and keeping this in mind, the evaluation team regard the following issues important:

- actors responsible for this Project, IOM Serbia&Montenegro and IOM F.Y.R. of Macedonia and their roles and responsibilities, relation with the IOM head quarters in Geneva, cooperation, guidance and follow-up of the IOM Geneva, IOM Geneva working in the area
- stakeholder analysis: as beneficiary groups the TOR and project document define women and children in the poorest regions, local authorities and civil society. These need to be specified in order to assess the Project success
- assessment of efficiency, effectiveness, relevance, impact and sustainability of the Project

The objective of the programme Counter Trafficking: Prevention and Capacity Building Activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia is
- building of a regional effort to combat trafficking in human beings to, from and via Balkans and neighbouring countries
- building of regional capacity to combat trafficking, through the strengthening of government and relevant authorities in taking appropriate counter trafficking measures at a policy level, while supporting the establishment of an assistance and advocacy NGO infrastructure
- improved capacity of law enforcement entities to combat trafficking in human beings

The purposes of the programme are
- To establish a functional Government and NGO infrastructure capable of raising awareness on the issue, promoting counter trafficking prevention activities, and building upon existing referral structures in order to create an assistance network, both at country/region levels as well as regionally.
- To facilitate and build regional NGO network and to strengthen the linkage between national and regional institutions and NGOs, thus raising awareness on the trafficking issue at the regional level.
- To effectively train the Law Enforcement personnel from all participating countries in knowledge, measures and procedures of effective preventive border management, including the prevention of document fraud, use of border management equipment and language training, based on the National Governments' strategies and International/EU standards.

The major components according to the Second annual report covering the implementation from December 2005 to June 2006 are:

1.1 Information to the Public and Awareness Campaigns Focusing on Raising Awareness and Promoting Prevention
1.2 Capacity Building and Empowerment of Local NGOs and Governmental Partners
1.3 Technical Management and Capacity Building of an NGO Assistance Network in the Region and the Creation of a Service Referral System for Vulnerable Groups
1.4 Capacity Building for Law Enforcement Authorities through Targeted Training and Awareness Raising

According to the financial report of the said period the operational activities are divided as follows:

1. Partners assessment and training
2. Information campaign
3. Prevention based projects
4. Referral system: from SOS Helpline to NGOs Services Providers
5. Evaluation activities
6. Support to the National Coordinator offices / KPA

The report focuses heavily on activity reporting and does not directly correspond to the financial report. Based on the Terms of Reference the following stakeholder groups will be interviewed in Kosovo and Macedonia. The following list is amended by the evaluation team. However, the evaluation team assumes that it is not the final one. To discuss with all these parties implies that group interviews will be held where appropriate and that IOM organises the meetings. Independent interpreter will be recruited with the help of the Finnish Liaison Office in Kosovo.

1. Non Governmental Organisations (NGOs) dealing with:
   - gender issues and human rights with specific focus on trafficking in human beings
   - youth population
   - communities where potential victims of migrant trafficking are identified
   - the list of NGOs to be interviewed will be negotiated with the IOM and the Finnish Liaison Office in Kosovo after the evaluation team has analysed the necessary background information
2. the Ministry of Interior, Specialised Police Unit to counteract Trafficking, Border Police, Customs Police
3. the Ministry of Labour and Social Welfare,
4. the Ministry of Health and Education,
5. International Organisations and UN agencies
6. Military Personnel (need to be specified)

We would also add to the interview list the following organisations:
7. the Ministry of Justice
8. Finnish Liaison Office in Kosovo

Evaluation criteria and key issues:

Cost-efficiency
- quantity and quality of the results vs. quantity and quality of the means and resources used
- appropriateness of the local and external human, material and financial resources
- time and resources allocated to the various Project components and activities

Efficiency (efficacy)
- to what extent has the Project implemented the activities planned in the Project Document, overall work plan and annual work plans and as decided in the meetings of the Steering Committee and/or the Supervisory Board, and to what extend it has achieved the results intended
- justification of the possible deviations

Effectiveness (Products in TOR)
- outcomes and their quality, satisfaction of the beneficiaries and stakeholders with Project work and results, major obstacles and external factors affecting the IOM work
- material, new knowledge and methods etc. taken in active use by the beneficiaries (content of training, methods applied in training, follow-up of training events)
Evaluation of Counter Trafficking: Prevention and Capacity Building Activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia
Evaluation Report 30 November 2006

Relevance
• relevance of the project logic: is the implementation contributing to prevention and capacity building, links with the government and institutions working under ministerial coordination
• relevance from the viewpoint of different final beneficiary groups
• relevance from the viewpoint of national legislation: support to prevention of trafficking in human beings? criminal law, aliens act and legislation related to health and social services are the major elements
• relevance with other counter trafficking programmes and projects
• relevance of the Project with the Finnish policies and goals

Impact assessment: questions raised in TOR are overly optimistic to be answered, and especially concerning the statistics on the trafficking in human beings which are not that reliable even inside the EU. Rather the signals indicating positive or negative as well as intended and unintended impact of this Project will be targeted.
• signals of positive impacts on the situation regarding with trafficking in human beings in general in the region (definition of positive impacts may vary from stakeholder to stakeholder)
• signals of positive impacts on situation of the potential victims and victims of trafficking
• signals indicating of increased public awareness of trafficking in human beings
• capacity to combat trafficking at the national and regional level
• establishment of an assistance and advocacy NGO infrastructure
• stakeholder groups perception of the Project and whether it has had or is foreseen to cause unintended negative impacts

Sustainability critical issues are listed below but the evaluation work will not be limited to these
• political: commitment to international policies and development efforts: e.g. status of United Nations Palermo Trafficking Protocol and Council of Europe Convention on Combating Trafficking in Human Beings; national policies
• institutional: national legislation; Project’s links with governmental organisations and their roles and responsibilities (referral mechanisms); institutionalisation of training components; cooperation between the IOM and immigration authorities
• financial and economic: service delivery to potential and presumed victims – also to identified victims?; training services
• socio-cultural: ethnic sensibility; habits and traditions
• gender: gender issues identified in planning; emphasis in implementation; reporting with segregated information, mainstreaming of gender issues
• technological: technology used (call centres) financing sustainability, cultural familiarity, social acceptance, human resources available
• environmental: has the Project had any environmental impacts (positive or negative), are efforts to mainstream environment, to the extent it is relevant, evident in the Project documents? If not, should that have been the case? If yes, how?

Organisation and administration and management procedures, especially from participation and ownership dimensions ensuring sustainability of the work done
• operational and financial management: planning, implementation, supervision, monitoring and reporting
• cooperation with the stakeholders (local actors [regional and national levels], international IOM, MFA): clarity of roles and responsibilities, communication system
• Project personnel and its ability to work as planned; the mandates and tasks and their relevance or are there needs for revising them (this needs to be clarified, if the evaluation team recommends to extend the Project until June 2007?)
• use of local and international experts and procedures applied in recruiting

3. Proposed Team

Biota BD Oy proposes Ms Päivi Äijälä (team leader / expert in development cooperation and project management issues) and Ms Venla Roth (expert in human rights issues / human trafficking) to carry out the evaluation assignment on the Counter Trafficking: Prevention and Capacity Building Activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia for the period from 17 October to 30 November 2006. Curricula Vitae of the experts are attached to this tender.

4. Time Schedule and phases of evaluation 17 October – 30 November 2006

1. Briefing and study of background material (3 workdays for the team leader and 3 workdays the human rights expert). MFA/ EUR-15 will provide all the necessary background information and documentation of the project and the countries.

2. Field trip to Kosovo and Macedonia 23 October – 3 November 2006 (10 workdays for the team leader, 10 workdays for the expert).

3. Reporting in two phases:
   Draft Evaluation Report will be sent to the MFA on 10 November 2006 to be circulated for comments. The dead line for written comments and feedback in English language is 24 November 2006.

   The Final Evaluation Report will be delivered in electronic pdf-format to the MFA by the 30 November 2006. (4 workdays will be allocated to the team leader and 4 workdays to the expert for the reporting.)
Annex 3. Persons Met

Interviewed persons in Kosovo

1. Abdullahu Ismet, Ministry of Health
2. Ahmeti Urim, USAID Kosovo, Program Management Specialist
3. Ahmeti, Ramadan, Kosovo Police Service, Head of Trafficking in Human Beings Section
4. Aliu Fatime, Ministry of Health, Steering Committee member
5. Bala, Nazlie, Adviser, Liria – Gjilone (NGO)
6. Barraghi, Feridoon, IOM staff, Resource Management Officer
7. Basha Adile, Min. of Labour, Protection of Families Section (Anti-Trafficking included); Steering Committee member
8. Begicevic Alma, OSCE, Senior Human Rights Adviser
9. Berisha Labinot, Min. of Culture, Youth and Sports (Counter-Trafficking Focal Point), Steering Committee member
10. Bojcova Lujza, Training Consultant
11. Brands Carel, Royal Netherlands Embassy, Deputy Head of Office in Pristina
12. Bunjaku Ragip, Kosovo Police Service, Head of Border Police Department
14. Busuku Habibe, division of teacher training
15. Buzhala Pashk, Ministry of Health, Director of Public Health
16. Bytyqi Nexhmije, Teuta – Prizsen, Executive Director (NGO)
17. Canolli Taibe, Kosovo Police Service, Head of Training Department
18. Dadakaj Antigona, IOM staff, Senior Project Assistant
19. Demiri Nora, IOM staff, Information Campaign Assistant / Education Focal Point
20. Deqani Lumnije, Women Wellness Center – Safe House Peja (NGO), Director
21. Edman Ervor, Liaison Office of Sweden, Senior Programme Officer
22. Gashi Shqipe, Min. of Education, Primary and secondary education curricula dev., Coordinator for civic education
23. Hajredini Habit, Office of the Prime Minister, Advisory Office for Good Governance, Kosovo Coordinator for Anti-Trafficking, Supervisory Board member
24. Igrishta Shemsi, Kosovo Police Service, Economic Crime and Corruption Section, Dir. major crime
25. Jaha Valbona, Ministry of Justice, Victim Advocacy and Assistance Unit/ Interim Security Facility
26. Jasiqi Murlan, LTN (Telephone help line) Coordinator, (NGO)
27. Jerman Tamara, UNHCR, Kosovo – UNMIK Protection Officer,
28. Jonuzi Njazife, Liria-Gjilone Director, (NGO)
29. Kadriu Lulavere, Min. of Education, Focal point for trafficking issues, Steering Committee member, also Member of Inter-Ministerial working group
30. Kelmenik Arta, Ministry of Justice, Acting Director of Department for Civil Rights, Head of Victim Advocacy and Assistance Unit
31. Koliqi Kushtrim, Integra, Executive Director, (NGO)
32. Krasniqi Leonora, Kosovo Police Service / Trafficking in Human Beings Section, Investigator, Police Training
33. Kuriu Arbena, UNICEF, Kosovo Office, Project Officer, Child Protection Officer
34. Laamanen Markku, Finnish Liaison Office in Kosovo, Head of Office
35. Lataj Hysen, Kosovo Police Service, Commander of Traffic Unit, Training
36. Liukkonen Veera, UNMIK-Kosovo Police Service, Specialised Crime Investigation Liaison Officer
37. Pacarizi Iliriana, Victim Service Centre (part of VAAU), Manager
38. Ponziani Enrico, IOM staff, Chief of Mission (IOM Kosovo and Skopje)
39. Potoku Remzije, Mundesia (NGO), Coordinator for Networking and Fundraiser,
40. Qelaj Nehat, Ministry of Justice, Victim Advocacy and Assistance Unit/ Interim Security Facility
41. Rashiti Memet, IOM staff, Training Assistant
42. Salihu Valbona, Executive Director, Lawyers Association Norma
43. Shanaj Hera, IOM staff, Programme Manager (Kosovo and Montenegro)
44. Shpresie Uka, Teuta – Prizsen, Administrator (NGO)
45. Uho Shpresie, Administrator, Teuta – Prizsen (NGO)
46. Vocia Musa, Mitrovica Trafficking in Human Beings Unit, Team leader and police
47. Vuori Sirpa, Helsinki Consulting Group
48. Weber Séverine, UNDP, UNV Programme Analyst for Security Sector

Interviewed persons in Macedonia

1. Arsova Jasmina, Save the Children – Macedonia, Executive committee member (NGO)
2. Bakovksa Elizabeta, Embassy of the Netherlands, Advisor Development Cooperation
3. Biljanovska Marija, Open Fun Football School, Administrative assistant (NGO)
4. Dilevska Tomka, Organization of Women of Skopje, Vice president (NGO)
5. Dimova Eleonora, Budenje, Deputy president (NGO)
6. Donnay Timothy, USAID Macedonia, Acting Mission Director / Program Officer
7. Eftimov Mite, Center for Children and Youth – ART, Executive director (NGO)
8. Fekeks Maaike, Embassy of the Netherlands, Second Secretary
9. Filipovski Zoran, Ministry for Interior Affairs, Head of Sector for European Integration
10. Gelevska Marija, ESE – Association of Emancipation, Solidarity and Equality of Women, Deputy executive director (NGO)
11. Gjurovska Tanja, Youth center “Open Space”, Project coordinator (NGO)
12. Jovanovska Biljana, Open Gate – La Strada Macedonia, SOS project coordinator (NGO)
13. Kasami Pranvera, Multikultura, Deputy executive director (NGO)
14. Kikere ko Tanja, Ministry of Justice, Head of Department for Human Rights
15. Kreshova Xhane, Forum of Albanian Women – Tetovo, President – project coordinator (NGO)
16. Mededova Kevsera, Association of Roma Women – ESMA, President
17. Meshko Nevena, Save the Children – Macedonia, Volunteer (NGO)
18. Mihova Gabriela, ESE – Association of Emancipation, Solidarity and Equality of Women, Assistant of the Program Women Human Rights (NGO)
19. Mitjevska Tatjana, USAID Macedonia, Program Administrative Assistant,
20. Najdova Rajna, Organization of Women of Skopje, President (NGO)
21. Nikolovksa Marija, IOM staff, Senior Project Assistant
22. Nikolovska Aleksandra, Open Fun Football School, Administrative Assistant (NGO)
23. Paunovic Ivona, IOM staff, Information Campaign Assistant
24. Pesic Silva, Office of the UN High Commissioner for Human Rights, Technical Cooperation Office in Skopje
25. Poceva Edita, Organization of Women – Kriva Palanka, President – project coordinator (NGO)
26. Portillo Monica, OSCE, Senior Rule of Law Officer – Anti Trafficking
27. Tepavic Elizabetta, Ministry for Foreign Affairs, Sector for European Integration, Counciler
28. Todorovska Marija, Open Gate – La Strada Macedonia, Manager for prevention and education (NGO)
29. Todorovska Slagjana, Forum of Albanian Women – Tetovo, Project coordinator (NGO)
30. Toseva Marija, HOPPS (Healthy Options Project Skopje, Program Director (NGO)
31. Velkoska Violeta, Coalition All for Trials, Project coordinator (NGO)
32. Xhaferi Feuzi, Ministry of Education and Science, Chief of Cabinet
33. Zakoska Ivona, IOM staff, Training Assistant
34. Zenki Vullnet, Multikultura, Executive director (NGO)
35. Zivkoviz Zoran, IOM staff, Training Assistant
Annex 4. Reference material

Project related reference material
1. Activities Update January – Mid June 2005
5. Approved revised budget (sent to the MFA archive 13.2.2006).
6. E-mail 18 December 2002 Sullini, IOM – Mattila, Takala, Tuominen, MFA
7. E-mails 12-13 July 2005 Jehona (Finnish Liaison Office Pristina) - Päivöke, MFA including report on the IOM launching
8. E-mails 12 December 2002 Tuominen, MFA – Sullini, IOM
11. E-mails 29 July - 1 August 2005 Shanaj, IOM –Päivöke, MFA including TORs for Supervisory Board and Steering Committee; Budget original, 1st revised and 2nd revised versions.
12. E-mails from 19 – 20 July 2005 Shanaj, IOM – Päivöke, MFA including Budget original and revised versions; Explanation note; Organigram CT Kosovo; Organigram CT Skopje; CV Radicetti.
14. Final report: Information Campaign on counter trafficking in Human Beings. OKAY DIVISION
21. IOM Kosovo Accounting Control List
22. IOM Kosovo Projectization of local staff salary from February 2005 to September 2006.
25. IOM project budget, Summary Sep 2006.
27. IOM response, Ponziani, 15.9.2005 (COM 038/05).
28. IOM Skopje Projectization sheets (local staff) from January 2005 to September 2006.
29. IOM Skopje purchases
30. List of mini-projects implemented in Kosovo
31. List of mini-projects implemented in Macedonia
32. MFA letter to IOM, Ponziani, 28.7.2005 (HEL0634-17).
33. MFA letter to IOM, Ponziani, 7.9.2005 (HEL0634-26).
34. Minutes of First Steering Committee meeting 10.6.2005.
35. Minutes of the Fifth Steering Committee meeting 6.9.2006.
38. Minutes of the Fourth Steering Committee meeting 2.6.2006.
39. Minutes of the project meeting 12.2.2002, MFA (HELD2451-10) includes Project summary (HELD2451-6).
40. Minutes of the project meeting 21.11.2002, MFA (HELD0645-4).
44. Minutes of the Third Steering Committee meeting 13.4.2006.
46. No-cost extension Activities Overview for July – December 2006 (separate sheets for Kosovo and Macedonia?).
51. Project document: Counter Trafficking activities: Capacity Building and Prevention Based Projects in Kosovo, Southern Serbia, Montenegro and Macedonia (no date! should be the original project proposal from 2001).
52. Project document: Counter Trafficking: Prevention & Capacity Building activities in Kosovo and FYROM and budget proposal (no date!, assumed by Rämä that it would be the revised version no two from September 2003).
57. Terms of Reference for the Appraisal Mission, MFA Unit for Western Balkans 13.5.2002.

Final reports of project funded mini-projects (follow-up projects to training) / IOM Kosovo
58. Final report: “Aware ourselves on the risks of trafficking phenomenon”. NGOs Sara from Sharr (Dragash), Women of Llapusha from Malisheve, Iliria from Therande (Suhareke) and Harea from Rahovec (no date).
60. Final report: “Information Campaign Against Human Trafficking”. The Center for the Empowerment of Women and Children, Shala Region and “Our Tomorrow – the Center for the Empowerment of Women and Children” in Vushtrri (no date)
61. Final report: “NGOs Capacity Building and the implementation of mechanisms for the support and reintegration of victims of trafficking”. NGO Norma + four local NGOs (no date)
63. Final report: “The role of health workers in the rehabilitation, integration and reintegration of victims of trafficking”. Ministry of Health (no date)
64. Final report: “Young Ambassadors for the Human Right and Against Trafficking”. Department of Psychology, Youth Centers June 2006.
Final reports of project funded mini-projects (follow-up projects to training) / IOM Macedonia

69. Final report: “Introduce yourself to your rights and protect yourself from the traffickers in humans” – get informed during childhood, for better and safer future. Institute for social work and social politics, Faculty of Philosophy, Skopje (no date)

70. Final report: “Let’s oppose the human trafficking”. JUM Centre of Social Work, Bitola (no date).


73. Final report: Awareness Raising Workshops for Children and Youth – Prevention of THB. Save the Children Macedonia, Skopje (no date).

74. Final report: Completion of two two-day seminars for social workers from CSR included in NRM. Ministry for Labour (?), May 2006.

75. Final report: Do not give your dignity to anyone – Be informed! Education of the Roma population for their protection against human trafficking. JUM Center of social work, Kocani 25.5.2006.

76. Final report: Everyone has rights. Ministry of Education (no date)

77. Final report: Information activities “Do you know how much are you worth”. Women’s Organization in municipality of Kriva Palanka, (no date).


Other reference and background material


84. Development Policy, Government Resolution 5.2.2004, Ministry for Foreign Affairs, Finland.


87. International Centre for Migration Policy Development (ICMPD): Programme to Support the Development of Transnational Referral Mechanisms (TRM) for Trafficked Persons in South-Eastern Europe (June 2006 – June 2008), financed by USAID.


89. IOM Draft Concept Paper: Reinforcing Counter-Trafficking Capacity Building, Prevention and Reintegration Activities. 24-month project proposal (no date), annexes from August 2006.

90. IOM Kosovo Activities overview. Updated in October 2006.


113. Sida funded IOM project Combating Trafficking in Human Beings, Kosovo budget 2005-2006.
114. Sida funded IOM project proposal / document Combating Trafficking in Human Beings in Albania, Bosnia Herzegovina, Bulgaria, Croatia, Kosovo (Serbia Montenegro), Macedonia, Moldova, Romania, Serbia Montenegro and Ukraine, November 2004.
116. Standard operating procedure (SOP) for direct assistance and support (DAS) to Kosovo victims of trafficking (KVoTs). 2006.
120. UNMIK Administrative Direction No. 2005/3 on the implementing UNMIK Regulation No. 2001/4 on the prohibition of trafficking in persons in Kosovo (UNMIK/DIR/2005/3).
121. UNMIK Department of Justice Victim Advocacy and Assistance Unit: Quick reference manual for victims’ advocates. UNMIK 2005.
122. UNMIK Regulation No. 2001/4 on the prohibition of trafficking in persons in Kosovo (UNMIK/REG/2001/4).
## Annex 5. Original project budget vs. revised budget and total costs by June 2006

**IOM International Organization for Migration**  
**COUNTER TRAFFICKING ACTIVITIES in KOSOVO and the F.Y.R. of MACEDONIA**  
**Budget Proposal for 24-month programme - costs are expressed in Euro.**

### ORIGINAL BUDGET

**OPERATIONAL COSTS**

<table>
<thead>
<tr>
<th>Budget Item</th>
<th>No.</th>
<th>Unit Cost</th>
<th>Months / Unit</th>
<th>Total Euro</th>
</tr>
</thead>
<tbody>
<tr>
<td>Partners Assessment &amp; Training</td>
<td>1</td>
<td>2500</td>
<td>6</td>
<td>15 000,00 €</td>
</tr>
<tr>
<td>Preliminary Consultation meeting with identified partners</td>
<td>1-b</td>
<td>Lumpsum</td>
<td></td>
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<tr>
<td>Consultants on training methodologies for all trainings</td>
<td>1-c</td>
<td>1</td>
<td>15000</td>
<td>3</td>
</tr>
<tr>
<td>Consultants on Law Enforcement (30 trainings)</td>
<td>1-d</td>
<td>2</td>
<td>2500</td>
<td>30</td>
</tr>
<tr>
<td>Consultants on Trafficking</td>
<td>1-e</td>
<td>2</td>
<td>2500</td>
<td>30</td>
</tr>
<tr>
<td>Development and Publishing of training materials (3 manuals)</td>
<td>1-f</td>
<td></td>
<td>10000</td>
<td>3</td>
</tr>
<tr>
<td>Training materials (handouts, support material)</td>
<td>1-g</td>
<td>2</td>
<td>600</td>
<td>18</td>
</tr>
<tr>
<td>Logistics Cost</td>
<td>1-h</td>
<td>2</td>
<td>900</td>
<td>18</td>
</tr>
<tr>
<td>Translators</td>
<td>1-i</td>
<td>4</td>
<td>700</td>
<td>18</td>
</tr>
<tr>
<td>Follow Up Projects (4 NGOs)</td>
<td>1-j</td>
<td>2</td>
<td>6000</td>
<td>10</td>
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<tr>
<td>Total Transportation Costs (Vehicle Maintenance &amp; Fuel, Rental)</td>
<td>1-k</td>
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<td>1200</td>
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<td>Total Partners' Assessment &amp; Training</td>
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<td>Info. Campaign Specialist (int'l. staff) - roving</td>
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<td>Info. Campaign Consultants (int'l. staff)</td>
<td>2-b</td>
<td>1</td>
<td>600</td>
<td>2</td>
</tr>
<tr>
<td>Kosovo - Info. &amp; Awareness raising campaign</td>
<td>2-c</td>
<td>2</td>
<td>38000</td>
<td>1</td>
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<tr>
<td>Macedonia - Info. &amp; Awareness raising camp.</td>
<td>2-d</td>
<td>2</td>
<td>38000</td>
<td>1</td>
</tr>
<tr>
<td>Information materials/internal produce/leaflets/photo/duplications</td>
<td>2-e</td>
<td>Lumpsum</td>
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<td>16 278,40 €</td>
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<td>Electronics Material (Digital camera and software)</td>
<td>2-f</td>
<td>2</td>
<td>800</td>
<td>1</td>
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<td>PC and printers</td>
<td>2-g</td>
<td>4</td>
<td>3500</td>
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<td>Total Information Campaign</td>
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<td></td>
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<td>Advocacy Training for Government Officials</td>
<td>3-a</td>
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<tr>
<td>Advocacy Training for Community-based programmes</td>
<td>3-b</td>
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<td>Development and Distribution of Educational Material for Schools</td>
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<td>Awareness Sessions in schools</td>
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<td>Final Information Campaigns</td>
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<td>2</td>
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<td>Total Prevention Based Projects</td>
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<td>Referral System: from SOS line to NGOs Services Providers</td>
<td>4-a</td>
<td>Set up of a Help Line in Kosovo</td>
<td>2</td>
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<tr>
<td>Training for SOS Help Line operators</td>
<td>4-b</td>
<td>2</td>
<td>3000</td>
<td>unit</td>
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<td>Salaries for SOS Help Line operators</td>
<td>4-c</td>
<td>2</td>
<td>80</td>
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<td>Counter Trafficking NGOs Network Support</td>
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<td>Total Referral System</td>
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<td>144 800,00 €</td>
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<td>Evaluation Activities</td>
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### REVISED BUDGET (FC6-CFI END: June 2006)

**OPERATIONAL COSTS**

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<tr>
<th>Budget Item</th>
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<th>Original vs.</th>
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<td>Partners Assessment &amp; Training</td>
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<tr>
<td>(A) Consultants on training methodologies for all trainings</td>
<td>80 000</td>
<td>35 000</td>
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<tr>
<td>(B) Consultants on Law Enforcement/trainers</td>
<td>150 000</td>
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</tr>
<tr>
<td>(C) Consultants on Trafficking (Removed)</td>
<td>0</td>
<td>-150 000</td>
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<tr>
<td>Development and Publishing of training materials (3 manuals)</td>
<td>30 000</td>
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<td>Training materials (handouts, support material)</td>
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<td>Logistics Cost</td>
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<tr>
<td>Translation/interpretation</td>
<td>50 400</td>
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<td>Follow Up Projects (4 NGOs and 4 Gov. Partners)</td>
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<td>Total Transportation Costs (Vehicle Maintenance &amp; Fuel)</td>
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<td>Total Partners' Assessment &amp; Training</td>
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<td>Info. Campaign Specialist (int'l. staff) - roving</td>
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<td>Kosovo - Info. &amp; Awareness raising campaign (phase 1)</td>
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<td>Kosovo - Info. &amp; Awareness raising campaign (phase 2)</td>
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<td>Electronic Material (Digital camera and software)</td>
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<td>PC and printers</td>
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<td>Total Information Campaign</td>
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<td>Advocacy Training for Government Officials/trainers</td>
<td>180 000</td>
<td>0</td>
</tr>
<tr>
<td>Advocacy Training for Community-based programmes</td>
<td>130 000</td>
<td>0</td>
</tr>
<tr>
<td>Development and Distribution of Educational Material for Schools</td>
<td>76 000</td>
<td>0</td>
</tr>
<tr>
<td>Awareness Sessions in schools</td>
<td>70 000</td>
<td>0</td>
</tr>
<tr>
<td>Final Information Campaigns (phase 2)</td>
<td>152 000</td>
<td>0</td>
</tr>
<tr>
<td>Total Prevention Based Projects</td>
<td>608 000</td>
<td>0</td>
</tr>
<tr>
<td>Referral System: from SOS line to NGOs Services Providers</td>
<td>28 000</td>
<td>-28 000</td>
</tr>
<tr>
<td>Training for SOS Help Line operators</td>
<td>6 000</td>
<td>0</td>
</tr>
<tr>
<td>Salaries/support for SOS Help Lines</td>
<td>28 800</td>
<td>0</td>
</tr>
<tr>
<td>Counter Trafficking NGOs Network Support</td>
<td>54 000</td>
<td>0</td>
</tr>
<tr>
<td>Total Referral System</td>
<td>116 800</td>
<td>-28 000</td>
</tr>
<tr>
<td>Evaluation Activities</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### TOTAL COSTS BY JUNE 2006

- **19%**
- **25%**
- **55%**
- **29%**
- **46%**
### Evaluation of Counter Trafficking: Prevention and Capacity Building Activities in Kosovo (Serbia and Montenegro) and F.Y.R. of Macedonia

#### Evaluation Report 30 November 2006

#### 5-a. Network Conference and Workshops/Internal Evaluation
- **Budget Item**: Network Conference and Workshops/Internal Evaluation
- **Unit Cost**: Lumpsum
- **Total**: 50 000,00 €

#### 5-b. Steering Committee meetings
- **Unit Cost**: Lumpsum
- **Total**: 18 000,00 €

#### Total Evaluation Activities
- **Total**: 68 000,00 €

#### 6. Development of a NAP for Kosovo

<table>
<thead>
<tr>
<th>Budget Item</th>
<th>Budget</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Network Conference and Workshops/Internal Evaluation</td>
<td>Lumpsum</td>
<td>50 000,00 €</td>
</tr>
<tr>
<td>Steering Committee meetings</td>
<td>Lumpsum</td>
<td>18 000,00 €</td>
</tr>
<tr>
<td><strong>Total Development of NAP Activities</strong></td>
<td></td>
<td>68 000,00 €</td>
</tr>
</tbody>
</table>

#### 6-a. Network Conference and Workshops/Internal Evaluation
- **Unit Cost**: Lumpsum
- **Total**: 50 000,00 €

#### 6-b. Steering Committee meetings
- **Unit Cost**: Lumpsum
- **Total**: 18 000,00 €

#### 7. Contingencies
- **Total Contingencies**: 20 000,00 €

#### Total Evaluation Activities
- **Total**: 68 000,00 €

#### 6-c. Support to the National Coordinator Offices/KPA
- **Unit Cost**: Lumpsum
- **Total**: 15 000,00 €

#### 6-d. Travel and Meetings
- **Unit Cost**: Lumpsum
- **Total**: 5 000,00 €

#### Total Development of NAP Activities
- **Total**: 20 000,00 €

#### 6-e. Support to the Secretariat at the AOGG/OPM
- **Unit Cost**: Lumpsum
- **Total**: 11 000,00 €

#### 6-f. Websites
- **Unit Cost**: Lumpsum
- **Total**: 17 000,00 €

#### Total Support to the National Coordinator Offices
- **Total**: 48 000,00 €

#### Total Development of NAP Activities
- **Total**: 20 000,00 €

#### 6-g. Support to the Secretariat at the AOGG/OPM
- **Unit Cost**: Lumpsum
- **Total**: 11 000,00 €

#### 6-h. Websites
- **Unit Cost**: Lumpsum
- **Total**: 17 000,00 €

#### Total Support to the National Coordinator Offices
- **Total**: 48 000,00 €

#### Total Development of NAP Activities
- **Total**: 20 000,00 €

#### Contingencies
- **Total Contingencies**: 20 000,00 €

#### Total Evaluation Activities
- **Total**: 68 000,00 €

### B. STAFF & OFFICE COSTS

#### 8. Staff Costs

<table>
<thead>
<tr>
<th>Budget Item</th>
<th>Budget</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Manager (int'l staff) Kosovo and Macedonia</td>
<td>1 8500</td>
<td>204 000,00 €</td>
</tr>
<tr>
<td>Project Officer (national staff) Macedonia and Kosovo</td>
<td>2 1200</td>
<td>57 600,00 €</td>
</tr>
<tr>
<td>Focal Points in the Region (national staff)</td>
<td>4 895</td>
<td>85 920,00 €</td>
</tr>
<tr>
<td>Secretary</td>
<td>2 600</td>
<td>28 800,00 €</td>
</tr>
<tr>
<td>Driver</td>
<td>2 350</td>
<td>16 800,00 €</td>
</tr>
<tr>
<td>Staff Travel</td>
<td>2 390</td>
<td>18 720,00 €</td>
</tr>
<tr>
<td>Mission Support costs</td>
<td>2 2100</td>
<td>100 800,00 €</td>
</tr>
<tr>
<td><strong>Total Staff Costs</strong></td>
<td></td>
<td>512 640,00 €</td>
</tr>
</tbody>
</table>

#### 9. Office Costs

<table>
<thead>
<tr>
<th>Budget Item</th>
<th>Budget</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilities Rental and Management</td>
<td>2 785</td>
<td>37 680,00 €</td>
</tr>
<tr>
<td>Communications</td>
<td>2 660</td>
<td>31 680,00 €</td>
</tr>
<tr>
<td>Security</td>
<td>4 330</td>
<td>31 680,00 €</td>
</tr>
<tr>
<td>Bank fees 1% of locally spent funds</td>
<td></td>
<td>12 500,00 €</td>
</tr>
<tr>
<td><strong>Total Office Costs</strong></td>
<td></td>
<td>113 540,00 €</td>
</tr>
</tbody>
</table>

#### Total Staff & Office Costs
- **Total**: 626 180,00 €

#### Overheads

<table>
<thead>
<tr>
<th>Budget Item</th>
<th>Budget</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>IOM HQ Overhead 12% of Staff &amp; Office costs</td>
<td></td>
<td>75 141,60 €</td>
</tr>
</tbody>
</table>

#### Total Staff & Office costs including overhead
- **Total**: 701 321,60 €

#### TOTAL COSTS
- **Total**: 2 521 000,00 €

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**Note:** The table above shows the budget breakdown and costs for various activities and categories related to the evaluation of counter-trafficking efforts in Kosovo, Serbia, and Montenegro. The costs are detailed for different projects, including network conferences, site visits, development of NAPs, and support to national coordinator offices. The total costs for operations and overheads are summarized at the end.
### Annex 6. Summary Sheet: Monthly Projectization percentages and Salaries (Staff Table in Kosovo and Macedonia)

<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Dec</td>
<td>Jan</td>
<td>Feb</td>
<td>Mar</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

### Comments:

This is based on the summary sheet provided by the IOM Project Manager. The evaluation team has updated the table with information regarding the international staff on 30 November 2006. The figures are obtained from the projectization sheets received from IOM that same day.

The Salary/Monthly fee (EUR) rates include 8% of TE and MSP contributions as well. There may be slight differences for 2006, as MSP did not exist in 2004 & 5 and there have also been annual step increases.