

An Evaluation of the Anti-Trafficking Monitoring Project

Undertaken for Anti-Slavery International

Mike Kaye, 18 June 2010

An Evaluation of the Anti-Trafficking Monitoring Project

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1. Introduction: the scope of the evaluation

The purpose of this independent evaluation is to review and assess the operation of the Anti-Trafficking Monitoring Project and make recommendations in relation to how it might be improved based on lessons learned over the course of the first year. The report will:

- Outline the purpose, objectives and relevance of the project
- Identify lessons learned with regards to project design, focus, management, timing and efficient use of resources
- Assess the implementation of the project and its effectiveness in relation to its purpose and objectives
- Recommend appropriate options for a follow-up project

The evaluation was carried out between 18 May and 18 June 2010. In completing the evaluation interviews were carried out with the project staff, all members of the coalition's Monitoring Group and with a limited number of other stakeholders, including UKBA, the police and the Crown Prosecution Service.¹

Relevant project documentation was also reviewed during the evaluation, including applications and reports to funders, minutes of meetings, advocacy planning, job descriptions, monitoring and evaluation frameworks and project indicators.

The author is grateful to everyone who agreed to be interviewed as part of the evaluation and for the time they spent sharing their experience of the project.

¹ A full list of individuals interviewed, along with a copy of the standard questionnaire used, are attached as Appendix I to this report.

2. Executive summary

The Anti-Trafficking Monitoring Project correctly identified the need for a detailed national review to consider the effectiveness of the Government's anti-trafficking policies and the extent to which they were providing protection to trafficked people. The project was timed to take full advantage of the coming into force of the Council of Europe Convention on trafficking in people.

The Monitoring Project's resulting report, *Wrong kind of victim*, represents the most comprehensive snapshot of trafficking in the UK to date and collects together and analyses data relating to different types of trafficking across the country, including in the nations and regions. It provides new and credible evidence of widespread problems in victim support and protection, and illustrates a clear gap between the UK Government's obligations under the Council of Europe Convention and current practice.

This type of review had not been done before and it was only achieved through the collective work of a broad coalition of respected anti-trafficking organisations. The project's decision to invest a significant amount of time in the collection of primary data was ultimately a good use of resources because it provided a statistical basis to substantiate the report's conclusions and recommendations. Without this there was a significant danger that illustrative cases would be dismissed as isolated examples of bad practice rather than indicative of systemic failings.

It is too early to judge whether the Monitoring Project will persuade the UK Government to improve its performance on human trafficking. This can only be judged by reviewing which of the report's recommendations have been endorsed or implemented over the next 12 months. However, the project has been successful in respect of its other four key objectives, namely: auditing the Government's performance on trafficking, improving statistics on the number of trafficked people in the UK, developing a model for shadow reporting to GRETA and strengthening the call for a UK National Rapporteur on trafficking in people.

While it is clear from the above that the Monitoring Project has been a very effective project, the evaluation has identified a number of areas in which the implementation of the current project could have been improved:

1. Project design

The project was too ambitious as it was trying to achieve too much in one year. The scope of the audit would probably have been too big even without taking account of the time needed to establish the Monitoring Group and how it would function (one third of the project's total running time was allocated to this). This resulted in the research taking longer than envisaged and more information being collected than could be written up into a report by the May 2010 deadline.

2. Project structure and management

The structure of the project team (the Coordinator, Researcher and Consultant) could have been more effective. The division of labour and responsibilities between the relevant posts was in many ways inefficient and confusing, and resulted in individuals having different expectations of the roles they and other team members would play in the project.

While the project staff all worked with a high degree of professionalism, the fact that they did not operate as a cohesive unit meant that opportunities to correct problems in the initial project design were not identified at an earlier stage.

There was also scope for better managing the input of the Monitoring Group. Meetings did not focus sufficiently on strategy and making key decisions. There may also have been more potential to match expertise, capacity and tasks in relation to the coalition members, for example by not asking all agencies to try and gather cases, and not involving some agencies in meetings related to procedural issues.

3. Advocacy

The project was designed so that most of the advocacy work would be done after the research was finalised. The problem with this approach was that the results of the research were not available in any detail until the tenth month of a 12 month project.

This left little time to decide advocacy priorities and messaging and meant the opportunity to use the joint advocacy potential of the coalition during the project was not fully utilised. The finished report could also have been a more powerful advocacy tool, but the impact of the central findings and conclusions were diluted by the length and style of the report.

No time was built into the project proposal for advocacy work to promote the report's recommendations following the launch, although the coalition subsequently agreed steps to do this.

4. The information system

A lot of time was spent trying to establish an information system for which there was no appropriate software available. It took too long before the initial proposal and contractor were abandoned and a decision was taken to look for an alternative model.

The resulting system was far from perfect as project staff were not able to transfer data on trafficked people directly from coalition partners into the Monitoring Project's database. Consequently staff had to spend a lot of time re-inputting the information manually.

Conclusion

It is testimony to the dedication of the staff and members of the Monitoring Group that these issues did not undermine the project or stop it from delivering its key objectives successfully. The project, as implemented, represents good value for money and a good use of resources for both funders and NGOs. If some of the problems identified above had been avoided, it is likely that the project would have achieved the same results or better while using its resources more efficiently.

Unless a National Rapporteur is appointed, there will be a need for this type of project to continue so that there is independent scrutiny of the UK's anti-trafficking activities and to ensure that pressure is maintained on the Government to properly protect and assist trafficked people and fully implement its commitments under the Council of Europe Convention.

3. The purpose, objectives and relevance of the project

3.1 Background to the project

The Anti-Trafficking Monitoring Project was developed in response to the absence of an independent mechanism to monitor the effectiveness and impact of anti-trafficking policies in the UK. The project aimed to audit the performance of the UK Government in relation to its commitments under the Council of Europe Anti-Trafficking Convention, which entered into force in the UK on 1 April 2009.

In order to carry out the audit a coalition of nine organisations was formed which became the Anti-Trafficking Monitoring Group. The Monitoring Group was made up of Amnesty International UK, Anti-Slavery International, ECPAT UK, the Helen Bamber Foundation, ILPA, Kalayaan, the POPPY Project, TARA and UNICEF UK. In addition, the project also aimed to establish a unified system for collecting and analysing trafficking cases and data across the UK.

The Anti-Trafficking Monitoring Project was hosted and project managed by Anti-Slavery International and employed two full-time project workers (a Coordinator and a Researcher) and a short-term Consultant. The members of the Monitoring Group were responsible for guiding the direction of the project, sharing their experience and expertise with project staff and providing them with relevant information and contacts.

3.2 Project objectives

The overall objective of the project was to improve the protection and assistance of trafficked people in accordance with the UK's international obligations. The specific goals identified for the project were to:

1. Audit the Government's performance on trafficking in all areas relevant to the treatment of trafficked persons.
2. Get the Government to commit to improving its performance on human trafficking across all areas, but particularly victim protection.
3. Develop a model for shadow reporting to GRETA that could be replicated in other Council of Europe countries.
4. Strengthen the call for a UK National Rapporteur on trafficking in human beings.
5. Improve statistics on the number of trafficked persons in the UK (via a sustainable system for data storage and analysis).

In addition, the monitoring and evaluation framework (18 September 2009) also set the following goals for the project:

6. Rigorous assessment of the performance and quality of services delivered by various actors (including civil society) in order to highlight strengths, weaknesses and recommendations.
7. Improved public scrutiny of the Government's record on implementation of the Convention.

There was complete clarity among all of the coalition partners that the purpose of the project was to monitor and evaluate the UK Government's implementation of the Council of Europe

Convention on trafficking. However, most of the Monitoring Group were unable to identify the specific objectives of the project highlighted above. This is relevant in so far as it reflects the fact that most of those participating, and to some extent directing, the project were not focussed on achieving specific measurable goals outside the production of a robust research report which systematically reviewed whether the Government was fully meeting its international obligations under the Convention.

3.3 Relevance and appropriateness

The UK Government has been actively engaged in seeking to combat trafficking for approximately ten years. During this time it has passed anti-trafficking legislation, introduced a national action plan on trafficking, and established the UK Human Trafficking Centre and the National Referral Mechanism (NRM).

Despite these measures, anti-trafficking NGOs continue to observe serious failures in the system that have resulted in trafficked people not being properly identified or protected. The Monitoring Project rightly identified a clear need for a detailed national review to consider the effectiveness of the Government's anti-trafficking policies and the extent to which they were providing protection and support to trafficked people.

The project was timed to take advantage of the coming into force of the Council of Europe Convention in the UK in April 2009 and to use this opportunity to focus attention on changes that need to be made to existing procedures.

Some agencies were intending to try and monitor the implementation of the Convention and/or review the operation of the NRM through their own organisations prior to the project's formation. However, their individual efforts would have been limited by their resources and by the fact that most of them only worked in particular areas of the UK and on specific aspects of trafficking (e.g. trafficking for sexual exploitation, child trafficking, etc.).

The project also correctly identified a risk that the Government would point to the measures it had already taken, like the introduction of the NRM, as evidence that it was fully implementing its commitments under the Convention unless evidence was collected to show that this was not the case.

The Anti-Trafficking Monitoring Project was therefore designed to be a focal point for carrying out a comprehensive national review which would collect information on all forms of trafficking from a variety of sources and agencies in one place. It aimed to provide a holistic oversight of trafficking in the UK and facilitate independent scrutiny of the Government's anti-trafficking policies and the degree to which they complied with the Council of Europe Convention. These goals were clearly both timely and relevant.

4. Identify lessons learned from the project

4.1 Design, focus and timing

As has been noted above, this project was fundamentally well conceived as it identified a mechanism for providing a comprehensive review of the Government's anti-trafficking policy and a means for advocating for higher standards of protection and assistance to trafficked people. The decision to implement this project through a coalition was a real strength in the project's design.

Having a coalition of nine partners has risks as well as advantages, particularly in relation to the time it takes to decide things and reach compromises, but the benefits far outweighed the costs in this particular project. The organisations recruited on to the Monitoring Group represented a good cross-section of the key organisations involved in anti-trafficking work and they brought an excellent range of skills and knowledge to the project.

The mix of high profile organisations like Amnesty International and UNICEF with specialist agencies and service providers created a strong a coalition. The fact that such a broad range of agencies came together to speak with one voice on key issues of concern has given the project a lot of credibility.

It is difficult to conceive of a report like this being produced without the Anti-Trafficking Monitoring Project. Not only did coalition members like Kalayaan, Poppy, TARA and the Helen Bamber Foundation provide a very significant numbers of cases for the project, but each member of the Group had particular areas of expertise which enabled them to make additional and specific contributions to the project (e.g. ECPAT acted as a conduit for other children's agencies to input, ILPA provided expertise on the legal framework and TARA advised on devolved policies and strategies in Scotland).

The credibility of the Monitoring Group was also key to engaging other relevant agencies beyond the coalition members in the project's work. For example, Migrant Helpline allowed the project full access to all their data on trafficked cases; the Northern Ireland Law Centre helped set up a regional round table on trafficking and the Anti-Trafficking Legal Project helped with the provision of legal decisions. Many other agencies also provided valuable input into the project including the Welsh Strategic Migration Partnership, the Medaille Trust, BAWSO and the Irish Congress of Trade Unions.

In this way the project is much more than the sum of its parts and it needed all the members of the Monitoring Group to be involved to get the results it has. It is extremely unlikely that an academic institution or a single NGO would have engaged the cooperation of all of the members of the Monitoring Group, let alone the other stakeholders who contributed to the report.

One of the reasons that the coalition worked so well was because the members of the Monitoring Group were involved in the development and implementation of the project and were extremely committed to it. This was crucial to the project's success because all coalition members faced competing commitments and demands on their time. In addition, the pre-existing links between many individuals and organisations on the Monitoring Group was important in helping to ensure that the tensions that exist on some policy issues did not derail the process and that mechanisms were found to move forward.

Most of the weaknesses in the project's design stem from the initial application. This had to be hurried because of time constraints and an insufficient amount of time was taken to think through and plan the project, particularly in relation to timing, staff structure and advocacy issues (discussed in more detail below).

The difficulties that arose in delivering the project can be traced back to the fact that it was too ambitious in what it was trying to achieve in the time available. It planned to carry out an audit of the Convention, collect a significant amount of data on individual cases and set up an information system to store and analyse this. In addition, the project staff were not from an existing anti-trafficking agency and therefore would have had to spend more time getting to know the remit and areas of expertise of each of the coalition members as well as learning about the policy details in relation to trafficking.

This is already a large workload for one year, but this was not a pre-existing project and the first four months of the project (one third of its total running time) were allocated to establishing the Monitoring Group and how it would function, including: recruiting staff, developing the terms of reference, agreeing the memorandum of understanding; deciding on the research framework and methodology, etc.

Even without the problems and delays with the information system (discussed below), the scope of the audit needed to be scaled back and the final list of indicators that the Project Group agreed for examination was too long. While this provided the project with a solid evidential base it also resulted in the researcher collecting more information than the project could process into a report by May 2010.

The fact that it took longer to carry out the research than initially envisaged meant that the Monitoring Group had little idea of the substantive findings, in terms of data and analysis, before March 2010. For this reason, many members of the Group expressed frustration that too much time was spent on process issues (terms of reference, MoUs, etc) at the beginning of the project and that a lot of time was wasted at meeting between November and February because the Group could only speculate on what the research findings might be and were not able to discuss what advocacy messages and policy recommendations they should adopt.

The knock on effect of the delays in producing the report put a lot of pressure on some individuals involved in the project who had to work long hours to meet required deadlines. The fact that staff and coalition members put in this time is commendable, but not desirable. It should also be stressed that even with the hard work of all involved in the project, the report would not have been finalised in time for a launch in May as was originally planned in the project design and even at the launch on 16 June, printed copies of the full report were still not available (although ringbound photocopies were distributed on the evening).

These weaknesses in the design are common to many projects and could have been best addressed in two ways:

1. The funding application could have been for a longer period or for a project with a narrower remit.

2. Decisions could have been taken in the initial months of the project to reduce its scope and target the research on priority areas which would have the biggest impact in relation to the assistance and protection of trafficked people.

While this is easily said in hindsight, funding applications are often done against impending deadlines and organisations need to ensure that the project staff who are leading on these applications have the proper support from senior managers and other staff so that they can consider the project design and framework in the necessary detail. Similarly, funders should show flexibility if and when they are approached by project managers who have identified reasonable changes to an initial application which will make the project work better.

4.2 Structure and management

The project staff were very professional and efficient and successfully facilitated input from a broad range of stakeholders. They also liaised well with the Monitoring Group, showing flexibility around deadlines while doing everything possible to try and make sure people delivered on their commitments.

However, there was a lack coordination and clarity of purpose within the staff team. The team structure, communications issues and different expectations in relation to the roles particular team members would play saw considerable amounts of time wasted during the implementation of the project.

The main reason for this was the division of labour and responsibilities between the relevant posts. For example, the Project Coordinator's tasks included managing the consultancy relationship and reporting on research progress. However, the Project Researcher had responsibility for "designing the research project" and was obviously better placed to report on research progress. Similarly, the Researcher was required to "input into the report writing to be done by the project consultant" and therefore would have a more direct working relationship with the Consultant than the Coordinator.

The Project Coordinator was given responsibility for the project without really having the information or authority to manage it. The Researcher carried out the work on a day to day basis and naturally developed a more detailed picture of trafficking issues across the UK than the Coordinator. She was also better placed to identify problems that needed to be addressed in relation to data gathering or policy positions. The expertise and authority for resolving these issues more obviously rests with the Anti-Slavery Trafficking Programme Coordinator, the Monitoring Group or the Consultant, rather than with the Project Coordinator.

In practice, the Coordinator had more of a supporting role than a management role which included the administration and coordination of the Monitoring Group meetings, undertaking some research, making contacts, liaising with stakeholders and sorting out problems with the database.

A consequence of the lack of clarity around these roles and responsibilities was that the Anti-Slavery Trafficking Programme Coordinator had to become involved in the day to day management of the project, a role for which she did not have either the capacity or funding. In addition, the failure of the staff team to work together as a cohesive unit meant that opportunities to correct problems within the project at an early stage were missed (e.g.

problems with the database, timings around the delivery of the report, expectations around how far the Consultant would be editing or writing the report, etc.)

There was also scope for better management of input from the Monitoring Group, particularly around meetings. Despite having a timed agenda, meetings often overran and some would end without the relevant decisions being taken.

Members of the Monitoring Group stressed how valuable they found the meetings as a forum to discuss operational issues with partner agencies. However, they also expressed frustration that meetings were very long and that they often spent too much time on bureaucratic or procedural issues and not enough on solutions and strategy. These meetings needed to be more tightly chaired and directed so that discussions were managed and closed down at appropriate times so that the business of the meetings could be dealt with.

It should be stressed that all coalition members had a shared responsibility in relation to how the project was managed. Members of the Monitoring Group might have been able to use their experience to play a greater role in terms of addressing the issues that arose and helping the project run more smoothly

The problems highlighted above are not insignificant and the fact that they did not undermine the project is testament to the professionalism and commitment of the individuals involved. In retrospect, these problems could have been avoided or reduced through a variety of ways, including: clearer allocation of responsibilities in the tasks and job descriptions for the relevant posts; better communication between the relevant staff; a different staffing and/or management structure.

In relation to staffing, it would have been more practical to hire a staff member who was responsible for both doing the research and writing the report. This is not an unusual expectation and has a number of advantages over passing raw data over to consultant to write up:

- It is a more efficient use of time as it removes the need to coordinate with an extra person, explain and clarify issues relating to the research information and removes entirely the risk of communication problems over roles and responsibilities.
- It also focuses the researcher on the finished report because it is entirely their responsibility. This should help ensure that they develop arguments and identify solutions as they go along and also limit the amount of research they do because they know how long it will take them to write it up.

This would require someone to be recruited who already had some knowledge of the issue and was capable of writing a “campaign report” as well as having the necessary academic and research skills. However, if the Trafficking Programme Coordinator was line managing this person then they would have enough expertise and support to draw on and could also go to other members of the Monitoring Group for any additional assistance they may need.

Another advantage of having the Trafficking Programme Coordinator take over the role of project manager is that there is a much more natural information flow, both formal and informal, to this post from individuals within and beyond the Monitoring Group. This structure would, therefore, reduce the need to work at internal communications issues.

Also, the Anti-Slavery Trafficking Programme Coordinator has the expertise and experience required to provide stronger direction and chairing of meetings, particularly as she already knows the issues and organisations and has pre-existing relationships with many of the individuals involved – all of which makes this task much easier.

4.3 Advocacy component

Some effective advocacy work was done prior to the launch of the report. In particular, the submission of Parliamentary Questions and Freedom of Information requests proved an extremely important mechanism for highlighting concerns to decision makers both in Parliament and in Government and for obtaining information about how anti-trafficking procedures were functioning, as did the meetings that individual member agencies had with decision makers about the project and the forthcoming report.

The process of interviewing people for the research also had an impact on stakeholders and got many to positively engage with the issues. For example, some local authorities started processes to identify the appropriate staff to take responsibility for dealing with trafficking. Similarly, some NGOs are now looking at the full spectrum of rights that trafficked people have under the Convention and not just the NRM and how it is working.

Individual agencies have continued to pursue their own advocacy priorities in relation to trafficking during the course of the project, but were not able to use the findings from the research or draw on the joint advocacy potential of the coalition prior to the report launch.

While it is not unreasonable to describe the Anti-Trafficking Monitoring Project as being primarily a research project, there was certainly the potential for it to do more advocacy work during the course of the project. The failure to do so was not a resource issue, but rather a result of the way in which advocacy work was generally seen as following the research rather than being an integral part of the project. Thus the Monitoring Group waited for the research results and conclusions to be finalised before determining the core advocacy goals.

It could be argued that this was a sensible way to proceed, particularly as the NRM had only been introduced in April 2009 and stakeholders views on what reforms were needed to the system only crystallized when they saw it operating in practice.

The problem with this approach was that the results of the research were not available until the tenth month of what was initially a 12 month project, and even then not in detail. This left the Monitoring Group little time to decide priorities and messages in relation to what needed to be done to improve the treatment and protection of trafficked people.

The other problem was that no advocacy time was built into the project to follow up on the report launch. The project design leaves it up to coalition members to take forward the lobbying and campaigning work for the implementation of the report's recommendations, but without the support of the project.

It would have been desirable to build a stronger ongoing advocacy component into the project. This could have been facilitated by having:

- Clear priority issues and recommendations for change at the start of the project. These could have been adjusted, as necessary, according to research results as the project progressed.
- A draft report half way through the project or mini-reports on specific issues at various stages of the project.
- Some forum for engaging decision makers, outside of interviews, on issues arising from the research during the project lifecycle.

Any of the above would have given members of the coalition more opportunity to use information and evidence coming out of the research to press individually and collectively for the policy and practice changes that are urgently needed. More advocacy work during the project would have had the added advantage of generating further interest in the project.

4.4 Use and allocation of resources

The project as completed represents good value for money and a good use of resources for both NGOs and funders. However, there are ways in which resource allocation could be improved to deliver the same results more efficiently.

This project was well resourced, but despite this several coalition partners put in significantly more time on the project than they were funded for. Few of the agencies realised how much time the project would take and this was particularly true for service providers who had a larger burden of work because of the need to transfer case data to the project. At least two agencies were dependant on volunteers to help with the provision of this information which in itself has resource implications. If they had been unable to recruit volunteers or the volunteers had left it would have had a direct impact on the quantity and quality of information presented in the final report.

While some organisations contributed more than they were funded for this was not an issue for most, either because they would have done the work anyway or because they thought it was a good use of their time. However, several members of the Monitoring Group thought too much time was spent on process issues and the establishment of the research framework. Others felt there was an expectation that their organisations would be able to deliver cases even though they were not service providers and that they spent a considerable amount of time on this when their particular expertise could have been better used elsewhere.

There may have been more potential to match expertise, capacity and tasks in relation to the coalition members. For example, one agency did not feel that the time they spent on the project was the most efficient way for them to engage on trafficking issues. This was because as a member of the Monitoring Group they were involved in running and developing the project and they felt they could maximise their organisation's resources and impact by focussing on advocacy work via other mechanisms. More segregation of tasks could have dealt with some of these concerns and allowed the project to get the best out of the participating agencies (i.e. not asking all of agencies to try and gather cases and not involving some agencies in meetings related to governance or procedural issues).

As indicated above, there was scope for some savings in relation to the staffing structure. If the research element was shorter and more focussed, the report could have been researched

and written by the same person, removing or reducing the need for a consultant. The researcher post could also have been directly line managed by the Anti-Slavery International Trafficking Coordinator and the existing Coordinator role could then have been removed, made part-time or replaced with an additional part-time researcher, as considered most appropriate.

In relation to the establishment of the information system, it should be stressed that this involves a number of significant challenges, including the need to: protect client confidentiality and safety, avoid double counting cases and integrate information from a number of different databases.

However, having said this, a lot of time was spent trying to establish a system for which the software currently does not exist. The provisional information provided by the IT consultant was misleading, but it took too long before the initial proposal and contractor were abandoned and a decision was taken to structure the information system in a different way. This conclusion could probably have been reached sooner if there had been better communication and clarity in relation to the initial specifications or if other professional opinions were sought at an earlier stage.

Members of the Monitoring Group also found the process of getting trained to use the relevant software and collecting and inputting the required data to be very labour intensive and time consuming. This undoubtedly put a strain on the service providing organisations who were coalition members. While much of this was unavoidable, the quantity of data they were required to collect could have been reduced, particularly as some of this information was not subsequently used in the report.

The project put significant importance on quantitative research and the collection of primary data and it is worth considering whether the results justified the resources allocated to this task. It is certainly the case that it would have been quicker and more cost effective to only focus on collecting qualitative information which illustrated flaws in the existing procedures and showed that the Government was failing to implement certain aspects of the Convention. For example, by providing details of one or two individual cases in which trafficked people were being prosecuted for offences related to their being trafficked.

However, the extra time and energy expended in the collection and analysis of primary data was an efficient use of resources because it provides a statistical basis to substantiate the conclusions and recommendations made in the report. Without this there is a significant danger that illustrative cases would be dismissed as isolated examples of bad practice rather than indicative of systemic failings.

The Guardian article by Nick Davis (Autumn 2009), which questioned the seriousness of trafficking in the UK and the credibility of anti-trafficking NGOs, made the gathering of robust statistical data all the more important and further justified the resources invested.

5. Assess the implementation of the project and its effectiveness

While it is too early to properly assess the impact of the report and its recommendations, some initial conclusions can be made in relation to the degree that the project has met its declared aims and objectives.

Objectives 1, 5 and 6: Audit the Government's performance on trafficking, improve statistics on the number of trafficked people in the UK and rigorously assess the performance and quality of services delivered by various actors.

The project's report, *Wrong kind of victim*, represents the most comprehensive snapshot of trafficking in the UK to date and includes information from nearly 400 individual trafficking cases and 90 interviews with professionals working in this area. The report collects together and analyses an extensive body of data relating to different types of trafficking, including important information on what is happening in the nations and regions.

Wrong kind of victim has provided new and credible evidence of continuing systemic problems with victim support and protection and illustrated a clear gap between what is happening to trafficked people in practice and how they should be treated by the UK Government according to its commitments under the Convention.

In spite of the problems referred to above, the information system did deliver a specialised database which enabled the coalition to collect and analyse a greater amount of statistical information in relation to trafficked people than was previously available. Furthermore, the project has a wealth of statistical data that has not been used in the report and can still be used in the future.

While the project was effective in relation to these objectives, there was a strong view amongst both staff and members of the Monitoring Group that the finished report fell short of what could have been achieved by the project. Several coalition members felt that the report was not as persuasive as it could have been. Concerns were expressed that the content had become too technical and analytical, that it lacked impact and that there could have been a stronger voice for trafficked people in the report.

Some of the Monitoring Group thought there was a hesitancy to embrace the results of the research and that the advocacy messages were not hard hitting or clear enough, despite having the evidence to back them up. At least two members of the coalition thought the report lacked sufficient gender analysis in relation to the results and recommendations.

In addition, the report does not focus much attention on reviewing the quality of accommodation and support provided to trafficked people by the different service providers. While it has already been made clear that the scope of the project did need to be reduced, the lack of detailed analysis in this area is worth highlighting because it was specifically identified in the evaluation framework as a goal for the project. The absence of a critical review of NGO assistance and support services to trafficked people may also make the report seem less objective to some observers.

The concerns raised above by members of the Monitoring Group rightly identify areas where report could have been improved and reflect a general view that, while the finished product is good, it could have been better. The key messages and central findings are diluted by the

length of the report, which is more than 150 pages. It is also unclear who the target audience of the report is, as the length and style mean that it is unsuitable as a campaigning publication and will also be difficult for an audience of new MPs and policy makers to access.

These weaknesses are once again attributable to the ambitious nature of the project and the fact that it collected more information than it was able to pull together in a compact, accessible format in the time available. However, many of these issues have been resolved through the summary report which has been printed as a separate six page document and can be used as the principle advocacy tool for promoting the report's main findings and recommendations.

Objectives 3 and 7: Develop a model for shadow reporting to GRETA that could be replicated in other countries and improve public scrutiny of the implementation of the Convention

The project does provide a sound framework for shadow reporting which can be replicated in other Council of Europe countries. ECPAT UK and Anti-Slavery International are planning to share information about the Anti-Trafficking Monitoring Project at the EU level and a number of European NGOs have already expressed interest in learning from the Project's experience.

GRETA is also enthusiastic about the Monitoring Project as a model for informing the reporting process around the Convention because it provides detailed analysis of a Government's compliance with the Convention from a variety of respected sources which is collected in one place and supported by national data. US Department of State has also shown an interest in reviewing the model in relation to its Trafficking in Persons report. The new NGO platform organised by an Italian organisation On the Road has also used this model to develop as system of evaluating EU anti-trafficking policies.

However, as highlighted in this evaluation, there are a number of ways in which NGOs in other countries could improve on the existing model and there would also be a need to adapt the current framework so that it fits with the national priorities, structures and context of each particular country. For example, the Monitoring Project successfully piloted the use of the freedom of information legislation and this could be used effectively by NGOs in other European countries if they have similar laws.

In addition, other European NGOs would have to consider whether they have sufficient resources to replicate this project model. Those with less capacity could reduce the scope of the project by collecting anecdotes of bad practice which rebut claims made by their Government in their official report to GRETA or focusing on a limited number of priority national issues could be a more appropriate model than collecting large amounts of data.

The project has undoubtedly helped to improve understanding of the Council of Europe Convention and increased public scrutiny of the degree to which the UK is complying with its international obligations. Even amongst the members of the Monitoring Group there is a better understanding of the full range of issues covered by the Convention and a greater commitment to ensuring its proper implementation over time.

The research and interview process has been pivotal to increasing engagement both with the Convention and trafficking issues more generally across a broad range of stakeholders. This has led to some agencies collecting more information in relation to trafficking than before

(e.g. Refugee and Migrant Justice) or seeking to identify individuals to take responsibility for monitoring and dealing with trafficking issues within their organisations (e.g. local authorities). The launch of the report in Northern Ireland, Wales, Scotland and England and the associated media coverage reinforced this process and further raised public awareness (see appendix II for details).

Objectives 2 and 4: Get the Government to commit to improving its performance on human trafficking across all areas, but particularly victim protection and strengthen the call for a UK National Rapporteur on trafficking in human beings.

It will only be possible to properly judge whether the project has improved Government performance on human trafficking by reviewing which conclusions and recommendations have been endorsed and/or implemented over the next 12 months. However, it is possible to look at the political environment and consider the positive and negative factors which may influence the project's ability to influence the Government's performance on trafficking.

On the positive side, the fact that the Monitoring Project is made up of a range of well respected organisations who are expressing joint concerns has great value. The credibility of these organisations and the report itself makes it much harder to dismiss or ignore the report's recommendations.

The involvement of a variety of agencies in the project, including UKBA, the police and social services provides a platform for further constructive engagement. The report is likely to be taken seriously by the authorities because both UKBA and the police recognise the expertise of NGOs and the need to work together with them in order to properly address the problem of trafficking. They also accept that, while some progress has been made, more still needs to be done to improve the existing procedures.

The election presents an opportunity to press for policy changes as the new Government can blame the previous administration for the failings identified in the system. By implementing some of the recommendations the current Government could establish areas where it can point to progress it has made in relation to combating trafficking and protecting victims.

The incorporation of UKHTC into SOCA (April 2010) presents both opportunities and challenges. On the positive side, views within SOCA on how to combat trafficking will not be entrenched and it is a well-resourced institution with an enforcement capability and an intelligence capacity. On the negative side, it will be much harder to get trafficking information in the future as SOCA is exempt from Freedom of Information requests and informal communications channels may be reduced as many of the contacts that NGOs had at UKHTC have left.

Similarly, the change in Government may lead to a change in officials and a lack of continuity. Clearly, a number of MPs and Ministers who were committed to combating trafficking are no longer in key positions and those who have replaced them are likely to have a lower level of knowledge about trafficking issues. In this respect the report may be pitched at too high a level in terms of assumed understanding.

Despite having pushed back the launch, it was still too early to identify some key decision makers who it would have been useful to invite (e.g. the members of the relevant Select

Committees), but as the project staff's contracts were almost finished it would not have been possible to push it back any further.

Having said this, the Westminster launch and those in the nations were extremely successful, with good attendance from politicians and members of the public. They also generated good media coverage and a commitment from the Government and other decision makers to engage with its findings (see appendix II for more analysis of the launches and their impact).

While the points made above indicate that the report will influence the Government and lead to some policy changes and improvements to the system, it is unlikely to result in any significant structural changes. With departmental budgets to be reduced by up to 20 per cent in the coming year, the chances of proposals being accepted that require additional services or increased expenditure are remote. The Government is more likely to focus on changes that can be easily implemented, are cost neutral or have the potential to make cost savings for the relevant departments.

In this political environment ensuring that trafficking continues to be recognised as a priority issue and that there is a political commitment to improve the current systems and practices would be a significant achievement.

In addition, the evidence in the report could be used to achieve changes in relation to policy or practice through judicial processes. The findings from the project are already being looked at as a basis for bringing possible Judicial Reviews which might force the Government to change the way the NRM operates. Similarly, data from the report could be used to support some trafficked women's asylum claims.

In relation to the call for a UK National Rapporteur on human trafficking, it remains to be seen whether the report will influence the Government's thinking on this issue. However, the fact that important statistical and operational information could only be obtained from the relevant institutions through Parliamentary Questions or Freedom of Information requests illustrated the fact that the process is not transparent or properly accountable. This clearly underlines the need for an independent National Rapporteur who is given free access to this data and can bring it into the public domain while appropriately protecting confidential information (e.g. in relation to individual cases or internal policing issues).

6. Conclusions in relation to a follow-up project

6.1 Is there a need for the project to continue?

If an independent and properly resourced National Rapporteur is not created, then there will be a need for a central and independent body to collect and analyse information, monitor whether the current report's recommendations have been implemented and to assess whether the Government is fully complying with the Council of Europe Convention. While the Home Office will carry out their own review of the NRM and their obligations under international standards, they themselves recognise the value of an independent assessment.

Indeed, the Home Office is likely to review support and protection arrangements for trafficked people in the near future (as the current grant led arrangement expires in March 2011) to see whether grants to the Poppy Project is still the most appropriate way of funding such services or whether this could be done through mainstream funding (e.g. through local authorities). It would be extremely important for a body like the Monitoring Group to be able to carry out its own research and advocacy around such a review.

In all probability, there will therefore be a continuing need for the voluntary sector to come together to scrutinise the Government's record on trafficking. Without continued monitoring and evaluation and joint advocacy there will be little pressure on the Government to deliver on its obligations, improve its record and ensure sustained progress in anti-trafficking work.

The project has consolidated relationships among nine organisations with different aims, policies and client groups and enabled them to work together constructively. Moreover, it has provided a space without UKBA in which the key organisations can regularly meet to share knowledge, discuss operational issues and consider what they can do to improve the protection and support of trafficked people.

However, without the focus of the project and the required funding to coordinate meetings and collect and analyse data, it is likely that the important functions that the Monitoring Project has performed in the last year will not take place. Contacts between agencies will revert to ad hoc or bi-lateral meetings and data collection and sharing will not continue beyond what agencies did previously as there is no capacity to do more.

6.2 Specific recommendations for a follow-up project

Project funding

Funding should be sought for a longer period of time. A benchmark has been set through the current report and it would be logical to look to improve on that through monitoring, evaluation and advocacy work over the next three to five years.

Campaigning for policy changes and then seeking to ensure their proper implementation cannot be achieved in a one year timeframe. In the current economic climate it is possible that advocacy work may be focussed on trying to retain existing resources for combating trafficking and supporting trafficked people before positive changes to system can be achieved.

It is also more cost effective and efficient to apply for longer grants rather than to keep putting in applications for short term projects.

Project structure

The majority of coalition members were positive about continuing the project, but were keen for it to be more targeted and for the end report to have a different format. The project could achieve this by focussing on a narrower remit than the current audit of the UK anti-trafficking activities. Options for this could include:

- Reviewing the extent to which the Government has implemented the recommendations from the Monitoring Group's current report and/or the recommendations coming out GRETA formal review process.
- Identifying three to five core issues that are having the most impact on trafficked people in the UK, undertaking research to illustrate this and proposing the required changes in policy and practice which all members of the coalition would then support.
- Undertaking research on specific thematic issues which could correspond to articles of the Convention (e.g. child trafficking, accommodation and support services for trafficked people, the prosecution of trafficked people, the NRM, compensation, trafficking for forced labour, residency permits for trafficked people, etc.) and include examples of good practice elsewhere in Europe.
- Reviewing Government claims in relation to how well current systems are working or how it is in compliance with the articles of the Convention and then focussing on providing sufficient evidence and case studies to disprove this.

Limiting the remit of any future project through these or similar options should provide a future project with a more manageable research brief and give it greater potential for carrying out advocacy during the course of the project.

Ongoing advocacy might include engaging government officials, statutory agencies and other NGOs in roundtables around thematic issues as drafts become available or having a midway reporting stage in which these stakeholders would have an opportunity to input into the process.

Project staffing

As outlined above, a follow-up project would benefit from funding the Anti-Slavery International Trafficking Project Coordinator (or equivalent if a different organisation takes over the hosting role for the Monitoring Group) to project manage the process and chair the meetings instead of recruiting a Coordinator.

Also a researcher should be given a more manageable remit, but hired both to research and write up a report, with guidance and support coming from the project manager or the Monitoring Group rather than an outside consultant. It may be appropriate to hire more than one researcher, particularly if the project is focussed on a number of smaller thematic reports.

Consideration should be given to providing additional funding direct to partners (particularly those providing cases and a large amount of data to the project) to properly cover the time invested in the project. It may also be appropriate to pay partners directly for some specialist research if there are several thematic trafficking studies or if partners are in a position to carry out a specific piece of work which could contribute to a larger report.

Membership of the Monitoring Group

By not including organisations such as Migrant Helpline on the Monitoring Group there is a danger that the coalition could be accused of excluding agencies which support the NRM and other Government policies. However, the fact that Migrant Helpline and other agencies which have good working relationships with statutory bodies were effectively engaged in the project did minimise that risk.

Including new organisations in the coalition which have working practices or policies that are unacceptable to existing members would also run the risk of undermining the Monitoring Group's ability to work together and reach consensus on policy positions. Furthermore, widening the membership of the coalition would increase the time taken to reach decisions and sign off documents. For these reasons, a future project should not aim to increase membership of the Monitoring Group.

It would, however, be worth reviewing the nature of participation more widely and considering what different mechanisms might be used for further engaging a range of stakeholders, other than becoming members of the coalition.

Options to consider in this regard would include: setting up multi-agency groups in the nations and regions which can feed into the core Monitoring Group; setting up small issue based sub-groups which meet separately to the Monitoring Group to look at specific issues (e.g. thematic trafficking issues, individual articles of the Convention, etc.); or having more focussed agendas for meetings of the Monitoring Group (e.g. one on Governance issues, one on child trafficking, one on data collection) and then inviting additional organisations to join appropriate meetings.

Appendix I: Standard questionnaire for the evaluation and people interviewed

Standard questionnaire for the evaluation of the Anti-Trafficking Monitoring Project

1. Project design and management

1.1 What was the purpose of the project?

1.2 Did the pilot project address a relevant need and gaps? How well did it complement ongoing trafficking work? What analysis was carried out prior to the project start?

1.3 What were the specific objectives of the project?

1.4 In retrospect are there any changes you would have made to the aims or design of the project?

1.5 How appropriate were partners in terms of mandate, influence, capacities and commitment?

1.6 How has your organisation been involved in project implementation?

1.7 Did all stakeholders take ownership of the project?

1.8 Was there a clear understanding of the roles and responsibilities by the Monitoring Group and the staff?

1.9 Have the project funds and activities been delivered in a timely manner?

1.10 Have resources been allocated appropriately to achieve outcomes? Have you been adequately resourced to contribute effectively to the project?

1.11 Has the project been appropriately responsive to political, legal and institutional changes in the project environment?

1.12 Do you think the project got the right mix of research and advocacy?

2. Project effectiveness, lessons learned and sustainability

2.1. What have been the project main strengths and achievements?

2.2. What factors have contributed to these achievements?

2.3. Are the project results and achievements durable?

2.4. Could the project have achieved the same results with less resources or could resources been better allocated elsewhere?

2.5. What have been the projects main weaknesses, what has not gone so well?

2.6. What problems have been encountered and how have they been over come?

- 2.7. How effective has the coalition been?
- 2.8. How could the project have worked better? What if any alternative strategies would have been more effective in achieving the projects objectives?
- 2.9. What other lesson can we draw from the project (positive or negative)? Have there been any unintended or unexpected positive or negative effects?
- 2.10. Is there a need for the project to continue and if so in what should its purpose be?
- 2.11. How could any follow-up project build on existing achievement? Should it have the same structure?
- 2.12. Is your organisation willing and committed to continue with the project?
3. How successful would rate this project in terms of:
 - 3.1 Delivering its planned outputs?
 - 3.2 How highly would you rate the project model for monitoring and evidence gathering by civil society of governmental anti-trafficking efforts? Can it be replicated elsewhere?
 - 3.3 How highly would you rate the project report in terms of credibility, evidence base and persuasiveness for advocacy goals? Will you be using this in your future work?
 - 3.4 How likely do you think it is that the project will contribute to an improvement in the Government's performance on human trafficking/improve the protection and assistance of trafficked people? How could it have been more effective?
4. Other comments

People interviewed as part of the evaluation (all interviews carried out between 19 May and 4 June 2010)

Members of the Anti-Trafficking Monitoring Project Group

Hannah Pearce, Project Officer, ECPAT UK
 Alison Harvey, General Secretary, ILPA
 Bronagh Andrew, Service Manager, TARA
 Sara Westerberg, Office and Outreach Coordinator, Helen Bamber Foundation
 Poonam Joshi, Gender Policy Advisor, Amnesty International
 Abigail Stepnitz, National Coordinator, POPPY Project
 Jenny Moss, Community Advocate, Kalayaan,
 Klara Srivankova, Anti-Slavery International, Trafficking Programme Coordinator
 Dragan Nastic, Policy, Parliamentary and Legal Officer, UNICEF UK

Staff of the Anti-Trafficking Monitoring Project

Rebecca Wallace, Project Coordinator, Anti-Trafficking Monitoring Group

Mike Dottridge, Consultant
Lorena Arocha, Project Researcher

Project partners and contacts

Detective Inspector Tom McClure, Northern Ireland Police Service (Organised Crime)
Lois Hamilton, Legal Advisor at the Law Centre of Northern Ireland
Rob Jones, Deputy Director, Policy and Strategy Group, UK Borders Agency
Detective Inspector Steve Wilkinson, formerly Head of the Metropolitan Police's Human Trafficking Unit
Pam Bowen, Senior Policy Advisor, Strategy and Policy Directorate, Crown Prosecution Service.

Appendix II: Initial summary of the impact of the report launch in England, Scotland, Northern Ireland and Wales

Total media coverage across the UK around the launch of the report (as of 18 June 2010) included four TV pieces (three of which were national), nine radio pieces (seven of which were national) and 51 print/online pieces (13 of which were national).

The detail of this media coverage is broken down by region below and information regarding attendance at the launches is included where available.

Media coverage in England

National TV

1. BBC One Breakfast
2. BBC News Channel
3. Sky News

National Radio

1. BBC Radio 4 Today
2. BBC Radio 5 Live Breakfast
3. BBC Radio 5 Morning Reports
4. BBC World Europe Today
5. BBC Arabic Service
6. BBC Asian Network
7. Christian Premier Radio

National Print/Online

1. Guardian
2. BBC Online – article
3. BBC Online – footage
4. BBC Russia service
5. Independent Online
6. Mirror.co.uk
7. Dailystar.co.uk
8. Dailyexpress.co.uk
9. Eveningstandard.co.uk
10. InTheNews.co.uk
11. yahoo news
12. MSN news
13. AOL

Local Radio

1. BBC Radio Sheffield

Regional Print/Online

1. Ealinggazette.co.uk
2. Evening Times
3. Fulham & Hammersmith Chronicle
4. Gazette Live Online
5. Hinckley Times Online
6. icWalsall.icnetwork.co.uk
7. LondonWired
8. Solihull & Warwickshire Guardian Online
9. Whitchurch Herald
10. Wokinginformer.co.uk
11. Huddersfield Daily Examiner Online
12. Coventry Telegraph
13. Southport Visitor
14. Journal live
15. Loughborough echo
16. Formby Times
17. Staines News
18. Chester Chronicle
19. Bootle Times
20. Surrey Herald
21. Hounslow Chroncile
22. IC Essex
23. Liverpool Daily Post
24. Birmingham Mail
25. Birmingham Post

Attendance at the launch

There were some 45 attendees at the Westminster launch (not including members of the coalition). This included 11 MPs and Peers (Nia Griffin MP, Russell Brown MP, Susan Elan-Jones MP, Lady Hamwee, Lord Hylton, Jeremy Lefroy MP, Heidi Alexander MP, Louise Ellman MP, Meg Munn MP, Pauline Latham MP, Peter Bone MP and Bridget Phillipson MP).

Scotland

Broadcast

1. BBC One News at ten - TV

Print/Online

1. Herald
2. Scotsman
3. icScotland
4. Metro Scotland,
5. Press & Journal

Attendance at the launch

In Scotland, there were 55 participants, including seven MPs.

Wales

Broadcast

1. BBC Radio Wales

Print

1. Western Mail
2. WalesOnline
3. Flintshire Chronicle
4. North wales Weekly News
5. Caenarvon Herald
6. Daily Post

Information on the Welsh launch was not available on 18 June 2010.

Northern Ireland

1. Belfast Telegraph
2. UTV news

Information on the Northern Ireland launch was not available on 18 June 2010.