Evaluation Report

Evaluation of National Referral Mechanisms

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The U.S. Department of State Office to Monitor and Combat Trafficking in Persons

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Acronyms

<table>
<thead>
<tr>
<th>Acronyms</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>BiH</td>
<td>Bosnia and Herzegovina</td>
</tr>
<tr>
<td>CSO</td>
<td>Civil society organization</td>
</tr>
<tr>
<td>DOJ</td>
<td>U.S. Department of Justice</td>
</tr>
<tr>
<td>DOS</td>
<td>U.S. Department of State</td>
</tr>
<tr>
<td>ET</td>
<td>Evaluation team</td>
</tr>
<tr>
<td>IOM</td>
<td>International Organization of Migration</td>
</tr>
<tr>
<td>IP</td>
<td>International Programs</td>
</tr>
<tr>
<td>GSA</td>
<td>Good Samaritan Association</td>
</tr>
<tr>
<td>IO</td>
<td>International organization</td>
</tr>
<tr>
<td>IPF</td>
<td>Implementation Phase Framework</td>
</tr>
<tr>
<td>KII</td>
<td>Key informant interview</td>
</tr>
<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
</tr>
<tr>
<td>MGECW</td>
<td>Government of Namibia Ministry of Gender Equality and Child Welfare</td>
</tr>
<tr>
<td>MLSSM</td>
<td>Ministry of Labor, Social Protection and Migration</td>
</tr>
<tr>
<td>MoH</td>
<td>Ministry of Health</td>
</tr>
<tr>
<td>MoIA</td>
<td>Ministry of Internal Affairs</td>
</tr>
<tr>
<td>MoLSA</td>
<td>Government of Ethiopia Ministry of Labour and Social Affairs</td>
</tr>
<tr>
<td>MOU</td>
<td>Memorandum of understanding</td>
</tr>
<tr>
<td>MoWCYA</td>
<td>Government of Ethiopia Ministry of Women, Children and Youth Affairs</td>
</tr>
<tr>
<td>NCB</td>
<td>National Coordination Body</td>
</tr>
<tr>
<td>NGO</td>
<td>Non-governmental organization</td>
</tr>
<tr>
<td>NPC</td>
<td>National Partnership Coalition</td>
</tr>
<tr>
<td>NPPAT</td>
<td>National Referral Mechanism Promising Practices Assessment Tool</td>
</tr>
<tr>
<td>NRM</td>
<td>National referral mechanism</td>
</tr>
<tr>
<td>OSCE</td>
<td>Organization for Security and Cooperation in Europe</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard operating procedure</td>
</tr>
<tr>
<td>TIP Office</td>
<td>U.S. Department of State Office of Trafficking in Persons</td>
</tr>
<tr>
<td>UN</td>
<td>United Nations</td>
</tr>
<tr>
<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
</tr>
<tr>
<td>UNW</td>
<td>UN Women</td>
</tr>
<tr>
<td>U.S.</td>
<td>United States</td>
</tr>
<tr>
<td>USAID</td>
<td>U.S. Agency for International Development</td>
</tr>
<tr>
<td>USG</td>
<td>United States Government</td>
</tr>
<tr>
<td>VID</td>
<td>Victim identification data collection systems</td>
</tr>
<tr>
<td>WHA</td>
<td>Western Hemisphere</td>
</tr>
</tbody>
</table>
A. Introduction

Background

A national referral mechanism (NRM) is a “co-operative framework through which state actors fulfil their obligations to protect and promote the human rights of trafficked persons” and coordinate strategic partnerships with civil society toward this responsibility.\(^1\) In general, NRMs involve government, civil society, and international organizations collaborating to establish a standard approach to proactively identify, refer, protect, and support victims of human trafficking. Countries can design NRMs differently, but to be effective, NRMs should incorporate a victim-centered and trauma-informed approach. Given the scope of this goal and the number of stakeholders involved, NRMs are expansive and vulnerable to numerous challenges, including bureaucratic, legal, cultural, and resource challenges. The onset of the COVID-19 pandemic has further threatened the implementation, effectiveness, and sustainability of NRMs. A 2020 survey conducted by the Organization for Security and Cooperation in Europe (OSCE) and United Nations Women (UNW) found that out of 102 countries analyzed, approximately half had a partially operational NRM (or an equivalent system) and only 14 percent had a fully functional NRM.\(^2\) The absence of an effective NRM can undermine proper identification and protection of survivors and hinder prosecution of perpetrators.

1. Evaluation Purpose and Questions

The U.S. Department of State (DOS) Office to Combat Trafficking in Persons (TIP Office) International Programs (IP) team funds several projects that facilitate the development of NRMs to proactively identify, refer, protect, and support human trafficking victims across the globe. The TIP Office contracted DevTech Systems, Inc. to conduct an evaluation of their projects that support the development of NRMs. This evaluation aims to: 1) assess the extent to which a sample of interventions funded by the TIP Office has contributed to the development and/or implementation of NRMs, 2) identify the different approaches taken for the development of NRMs, 3) evaluate successes, challenges, and promising practices within NRM systems funded by the TIP Office and others, 4) identify under what conditions the most successful NRMs have so far been developed, and 5) create decision-making tools (e.g., country readiness checklists) to help the TIP Office program more effective NRMs globally. To that end, DevTech designed the evaluation to answer the following questions:

1. To what extent have IP interventions contributed to the development and/or implementation of NRM systems?
   a. Identify the government institutions, civil society organizations (CSOs), international organizations, and other actors involved in NRM systems within each

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studied country. What is the role of each entity? How effective have they been in this role? What challenges currently exist for these entities?

2. What are some successful NRM governance systems IP has contributed to? Under what conditions have these systems been successful?
   a. To what extent have these systems been created to uphold human rights?

3. What are some less successful NRM governance systems IP has contributed to? Under what conditions have these systems stagnated? What are the challenges?

4. Do common characteristics exist across the various interpretations of NRM systems? Of these commonalities, are there any promising practices? Under what contexts/conditions? Can these commonalities be generalized across specific contexts?

5. Considering efforts outside of IP, what promising or best practices exist in the development and implementation of NRM systems?

6. Tools/Checklists: How can the TIP Office determine country readiness for NRM-related programming? Should programming be conducted in phases?

7. How can the TIP Office determine whether an NRM is functioning effectively or not?

**B. Evaluation Methodology**

1. **Approach and Design**

The DevTech evaluation team (ET) utilized a mixed methods approach to answer the seven evaluation questions. The ET used a combination of desk research, key informant interviews (KII), and an online survey to gather relevant data from multiple stakeholders (data collection activities are described in more detail below). By drawing on diverse data sources and data types, the ET triangulated data across multiple sources to verify findings. Data triangulation increases the reliability of the findings and resulting conclusions and recommendations presented in this report.

2. **Sampling Strategy**

The ET identified a sample of TIP Office-funded projects supporting NRMs for inclusion in the evaluation. Because the TIP Office supported numerous NRM-related projects between the target years of 2015 to 2020, selecting a sub-sample of those projects allowed for a more thorough and productive evaluation. The ET assessed the following criteria to facilitate the selection of sample projects from the list of 32 possible TIP Office projects:

- **Stage of U.S. Government (USG) project.** Projects must have already provided most of the planned assistance to ensure there is a sufficient body of data about the project interventions.
- **NRM in written draft.** Projects received higher scores under this criterion based on the degree to which the government was involved in the NRM drafting process.
- **NRM enacted.** Projects were scored according to the extent to which the NRM has been formally approved, rolled out, and actively implemented. A formally approved and implemented NRM offers opportunity for more extensive assessment of its successes and/or challenges.
- **NRM results under review and adaptation.** Projects that contain evidence of NRM monitoring and adaptation receive higher scores in this category than projects lacking formal NRM monitoring.

The ET scored projects on a scale of 1 to 10 for each of the above four scoring criteria. A score of one reflected a failure to meet the scoring criteria while a score of ten reflected fully meeting the scoring criteria. Projects could receive a maximum of 40 points. The ET applied additional characteristics, such as country, region, and implementing partner, to facilitate selection of a diverse final sample from the top scoring projects. Table 1 below contains the final sample of projects, reflecting the breadth of TIP Office NRM project characteristics while maintaining a manageable sample size (n=5) to allow thorough evaluation of each project.³

*Table 1. Evaluation Project Sample*

<table>
<thead>
<tr>
<th>Region</th>
<th>Country</th>
<th>Project Title</th>
<th>Implementing Organization</th>
<th>Implementation Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Africa</td>
<td>Ethiopia</td>
<td>Improving the Protection of Victims of Internal and Transnational Trafficking in Ethiopia</td>
<td>International organization for Migration (IOM)</td>
<td>3/1/20 – 2/28/22</td>
</tr>
<tr>
<td>Africa</td>
<td>Ethiopia</td>
<td>Enhance Effective and Victim-Centered Criminal Justice Responses to TIP in Ethiopia</td>
<td>UN Office on Drugs and Crime</td>
<td>7/1/20 – 6/30/24</td>
</tr>
<tr>
<td>Africa</td>
<td>Namibia</td>
<td>Strengthening Coordination to Respond to Trafficking in Persons in Namibia</td>
<td>IOM</td>
<td>10/1/15 – 3/30/19</td>
</tr>
<tr>
<td>Europe</td>
<td>Bosnia and Herzegovina</td>
<td>Enhance National and Local Capacities to Combat TIP</td>
<td>World Vision</td>
<td>3/1/20 – 11/30/22</td>
</tr>
<tr>
<td>South &amp; Central Asia</td>
<td>Kyrgyz Republic</td>
<td>Technical Assistance to the Government of Kyrgyzstan to Strengthen the Legal and Operational Framework for Combatting Trafficking in Persons</td>
<td>IOM</td>
<td>10/1/15 – 9/30/18</td>
</tr>
</tbody>
</table>

### 3. Data Collection and Analysis

As part of the mixed-methods evaluation methodology, the ET conducted three types of data collection activities.⁴

**Desk Review.** The ET drew upon two types of documents for the desk review.⁵ First, the ET collected pertinent documents relating to NRM best practices. These third-party resources grounded the ET in the requirements and expectations of successful NRMs as identified by the leading experts and organizations in the field. These resources additionally provided a framework of best practices against which the relative success of the TIP Office-funded NRMs

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³ After review of preliminary project documents and discussion with relevant TIP Office program officers, none of the IP-funded projects in the Western Hemisphere (WHA) were sufficiently involved with the NRM process to meet the threshold for inclusion in the sample. As such, this evaluation sample excluded WHA projects.

⁴ All data collection tools can be found in Annex III.

⁵ See Annex II for the full list of documents consulted.
could be assessed. Second, the ET collected documents specific to the five sampled projects. These documents included project logical frameworks, quarterly and annual performance reports, project monitoring call notes, project meeting minutes and attendance records, project reviews from DOS grants officers, and technical materials resulting from the project, such as draft NRMs, standard operating procedures (SOPs), and training manuals. The ET collated information collected as part of the desk review into a data matrix with relevant data organized under the appropriate evaluation question. The matrix also contained NRM promising practices with supporting data logged for each sampled country.

**Key Informant Interviews.** KIs were semi-structured discussions intended to deepen the ET’s understanding of the sampled projects and topics pertinent to each of the evaluation questions. The ET interviewed 62 individuals over the course of 55 interviews.6 By country, this included: 14 interviewees in Bosnia and Herzegovina (BiH), 16 interviewees in Ethiopia, 19 interviewees in Kyrgyz Republic, and 13 interviewees in Namibia.7 Interviewees included the following stakeholder groups:

- TIP Office program staff
- Implementers of the sampled projects
- CSOs/non-governmental organizations (NGOs) and international organizations (IOs) engaged in NRM efforts in the sampled countries/regions
- Government officials in sampled countries, including relevant ministries, security forces, and judiciary actors
- U.S. Government officials, such as U.S. Embassy staff, involved with the sampled projects

The ET prioritized interviews with those who had direct knowledge of and/or experience with the NRM. In some cases (such as with TIP Office staff or U.S. Government officials), staff turnover meant available interviewees had more limited but still relevant experience with the NRM. The number of key informants by stakeholder group for each country is presented in Figure 1.

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6 This exceeds the minimum of 40 KII stated in the evaluation design plan.
7 Although the evaluation sample included two projects in Ethiopia, many stakeholders were identical across both projects. KII with stakeholders in Ethiopia thus explored both projects where relevant to the individual interviewee.
The ET thematically analyzed each interview transcript using the qualitative coding software Dedoose. The ET iteratively developed thematic codes during data collection and throughout the coding process to reflect the concepts found in the KII. The findings presented in this report primarily reflect the most prevalent themes that represent the ideas and experiences raised most often during KII. Some minority themes, however, expressed by comparatively few interviewees, are also included due to their relative importance.

**Survey.** The ET designed an online survey to capture information from frontline actors who are direct users of NRM. The survey was deployed to social workers, health workers, police
officers, immigration officers, and others within relevant local and national government agencies and CSOs/NGOs. The ET identified survey recipients with support from interviewees across stakeholder groups and the ET’s own local networks and contacts. The survey was delivered using Microsoft Forms and was available in English, Serbo-Croatian (Cyrillic and Latin alphabets), and Russian to maximize accessibility in the sampled countries. Reminder emails were sent to promote survey completion.

The ET downloaded online survey data into an Excel file, cleaned the data, and translated it into English. Using Excel and the data visualization software Tableau, the ET analyzed the data to explore trends and aggregate results. A total of 64 respondents completed the survey out of the 93 individuals who received the survey (a response rate of approximately 69 percent). The majority (44 percent, n=28) of respondents identified as working for a CSO/NGO, followed by national government workers (34 percent, n=22) and local government staff (22 percent, n=14). Table 2 breaks down survey respondents by stakeholder group for each sampled country.

Table 2. Survey Respondents by Stakeholder Group

<table>
<thead>
<tr>
<th>Country</th>
<th>Local Government</th>
<th>National Government</th>
<th>CSO/NGO</th>
<th>Total Number of Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>BiH</td>
<td>7</td>
<td>7</td>
<td>6</td>
<td>20</td>
</tr>
<tr>
<td>Ethiopia</td>
<td>4</td>
<td>5</td>
<td>8</td>
<td>17</td>
</tr>
<tr>
<td>Kyrgyz Republic</td>
<td>2</td>
<td>3</td>
<td>12</td>
<td>17</td>
</tr>
<tr>
<td>Namibia</td>
<td>1</td>
<td>7</td>
<td>2</td>
<td>10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>14</strong></td>
<td><strong>22</strong></td>
<td><strong>28</strong></td>
<td><strong>64</strong></td>
</tr>
</tbody>
</table>

4. Evaluation Limitations

As with any research, bias can affect the reliability and validity of findings. Recall bias and response bias are most pertinent to this evaluation. Recall bias occurs when individuals do not remember details of prior events; this natural source of error can negatively affect the accuracy of their recollections. The ET mitigated recall bias by including specific probe questions in the KII protocols to actively explore topics. Response bias occurs when a person, consciously or unconsciously, provides incomplete or inaccurate responses. They may wish to present their organization in a positive light or echo the sentiments of higher-ranked individuals. One-on-one interviews—rather than group interviews—mitigate response bias, as do probe questions.

The evaluation also encountered methodological limitations. First, the ET did not collect data directly from trafficked victims. Although individuals exploited by traffickers are stakeholders to NRM, this evaluation focused on groups that developed and used NRM, such as government officials and service providers. To mitigate this limitation, the ET incorporated questions in the survey, KII, and desk review to assess survivor involvement in NRM development processes, whether NRM uphold victims’ rights, and whether NRM are trauma-informed and victim-centered. It is also possible that some interviewees had lived experience, but KII focused on their roles as developers or users of the NRM and did not ask individuals to disclose this information.

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8 This exceeds the stated target of 60 completed surveys in the evaluation design plan.
C. Findings

Promising Practices in NRM Development and Implementation

Considering efforts outside of IP, what promising or best practices exist in the development and implementation of NRM systems? (EQ 5)

When considering a successful and functional NRM, the literature identifies several promising practices. The OSCE developed the bulk of the literature on NRM promising practices. In 2004, following the enactment of the Palermo Protocol, the OSCE published the first NRM handbook that outlined 10 principles or best practices that should guide NRM creation. The OSCE has since reflected on the numerous NRMs established and operationalized since 2004. In doing so, the OSCE acknowledged that NRMs vary in structure and implementation, which sometimes leads to numerous challenges and gaps. In January 2022, OSCE released a second edition of the handbook with updated guidance. This handbook outlined 12 principles that should guide the creation and implementation of NRMs, including:

Figure 2. OSCE NRM Principles

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>A human rights-based approach</td>
<td>5</td>
<td>Recovery and reflection</td>
</tr>
<tr>
<td>2</td>
<td>A victim-centered, gender-sensitive and trauma-informed approach</td>
<td>6</td>
<td>Non-punishment</td>
</tr>
<tr>
<td>3</td>
<td>The best interest of children</td>
<td>7</td>
<td>Non-detention</td>
</tr>
<tr>
<td>4</td>
<td>Non-conditionality</td>
<td>8</td>
<td>Social inclusion</td>
</tr>
</tbody>
</table>

| 1   | A human rights-based approach                  |
| 2   | A victim-centered, gender-sensitive and trauma-informed approach |
| 3   | The best interest of children                 |
| 4   | Non-conditionality                             |
| 5   | Recovery and reflection                        |
| 6   | Non-punishment                                 |
| 7   | Non-detention                                  |
| 8   | Social inclusion                               |
| 9   | Partnership and cooperation                    |
| 10  | Transparency and accountability               |
| 11  | Effectiveness                                  |
| 12  | Prevention of human trafficking                |

These twelve standards apply to four important pillars that all trafficking victims must have equal access to: **1) identification (plus protection), 2) individual support and access to services, 3) social inclusion, and 4) criminal justice and redress.** An additional 57 standards are outlined and recommended for implementation across these categories.

Research from the Warnath Group additionally describes key components of an effective NRM, which include:

1. Forma l institutional framework for implementation, cooperation, and referral
2. Procedures for victim identification and referral
3. Comprehensive assistance services for victims of trafficking
4. Mechanism for voluntary referral to criminal justice and other legal avenues
5. Technical assistance and capacity building for NRM members

Equally important as these principles is the structure required to realize them. According to OSCE guidance, NRM s should be structured in a multi-disciplinary and collaborative manner and include the following:

1. **National Coordinator** – typically an appointed government body that is the lead authority in charge of the NRM, can contribute to developing policies and strategies at the national and local levels.
2. **Interagency Coordination Working Group** – chaired by the National Coordinator, composed of relevant government and civil society organizations, and responsible for coordinating implementation of the NRM and reporting to the National Coordinator. It can also include national and local level stakeholders.

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3. **Monitoring Body** – responsible for NRM oversight and reporting to the National Coordinator, can mandate to any national agency and monitors cost, quality, accountability, and performance.

4. **National Survivors’ Advisory Council** – incorporate survivors as stakeholders contributing to NRM policies, procedures, and practices.

5. **National Advisory Group of Experts** – multiple members with various areas of expertise, contributes evidence-based or innovative recommendations upon request by the National Coordinator or Interagency Coordination Working Group.

These criteria were used as a starting point to assess and analyze the success of TIP Office NRM projects while simultaneously considering local contextual features, such as the scope and nature of human trafficking, existing institutional/legal/regulatory frameworks, the level of cross-sector cooperation, resource availability, actors’ roles and responsibilities in the NRM, and overall capacity. These largely mirror elements noted in the literature above. DevTech used these promising practices as a framework to inform data collection tools for contextually aware case studies in BiH, Ethiopia, Namibia, and Kyrgyz Republic.

The results of this evaluation, presented below, reaffirm and update the criteria that comprise a successful, functional NRM and highlight challenges faced by both successful and less successful NRMs, which will contribute to TIP Office evidence building.

**TIP Office-Funded NRM Interventions**

To what extent have IP interventions contributed to the development and/or implementation of NRM systems? Identify the government institutions, civil society organizations, international organizations, and other actors involved in NRM systems within each studied country. What is the role of each entity? How effective have they been in this role? What challenges currently exist for these entities? (EQ1)

Human trafficking, whether happening in a city, country, or company’s supply chain, is a phenomenon that can be exacerbated by a self-perpetuating cycle of under-identification and lack of dedicated resources and prioritization due to a lack of political will. For a variety of reasons, research shows victims of both labor and sex trafficking do not commonly identify and self-report as victims of trafficking, and when they do, they may be missed or misclassified as victims of other types of crime or arrested and charged. As a result, the numbers of identified victims may be lower than they really are, and decision-makers may not feel pressure to prioritize human trafficking and dedicate human and financial resources to human trafficking service provision, investigation, prosecution, and prevention. Without specialized services and anti-trafficking stakeholders trained in victim-centered, trauma-informed, and proactive outreach, victim identification numbers remain low, perpetuating the cycle of under-prioritization of responses to human trafficking. Funding from the TIP Office is an important and powerful resource to help interrupt this cycle and jumpstart a country’s efforts at national and local levels. The TIP Office’s annual TIP Report—the USG’s “principal diplomatic tool to engage foreign governments on human trafficking [and] the world’s most comprehensive
resource of governmental anti-trafficking efforts”—serves as a global accountability mechanism, shining a light on both successes and challenges and motivating all countries to do better, the United States included. As a stakeholder from Namibia reflected,

“As much as Namibia is an upper middle-income country, some areas are not well funded. TIP was not seen as an issue because they didn’t understand what [human trafficking] is. As we all know, without knowing the statistics and the numbers, without people understanding the issue, people wouldn’t want to commit funds towards a specific problem. **Without the funding of the United States government, the NRM would not have been developed. The [TIP Office] funding made a difference.**”

Overall, findings from KII and surveys indicate that TIP Office-funded projects have been instrumental in providing support for both the development and implementation of NRMs across Ethiopia, BiH, Kyrgyz Republic and Namibia. Interviewees and survey respondents cite TIP Office support as the most comprehensive and reliable source of funding for NRMs across countries. While stakeholders mentioned other funding streams, these sources of funding were often narrowly focused on specific aspects of a country’s response to human trafficking, for example funding of services for subpopulations of trafficking victims or law enforcement training efforts, rather than supporting the more holistic development and implementation of an NRM. As indicated in Figure 3 Figure 3 nearly three-quarters (74.51 percent) of stakeholders across all countries and stakeholder groups agreed or strongly agreed that support received from the TIP Office-funded projects was critical to the development of their NRM.

**Figure 3. Survey Question: Importance of project to NRM development**

<table>
<thead>
<tr>
<th>Support from the implementer was critical to the development of the NRM</th>
<th>Percentage of Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>31.37%</td>
</tr>
<tr>
<td>Agree</td>
<td>43.14%</td>
</tr>
<tr>
<td>Neutral</td>
<td>7.84%</td>
</tr>
<tr>
<td>Disagree</td>
<td>3.92%</td>
</tr>
<tr>
<td>Strongly Disagree</td>
<td>5.88%</td>
</tr>
<tr>
<td>Don’t know</td>
<td>7.84%</td>
</tr>
</tbody>
</table>

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14 From interview NAM10
The ET analyzed interview and desk review data to discern themes in the major activities of TIP Office-funded NRM projects. The ET found projects included similar activities across sites, such as drafting and amending laws and SOPs, including for the NRM, human trafficking, and related activities, such as witness protection, migration, and asset forfeiture; providing subject matter expertise; delivering trainings; organizing national coordinating bodies; and raising awareness about the importance of anti-trafficking efforts. TIP Office-funded implementing organizations, and the trainings and meetings they convened, were seen as supporting momentum to address human trafficking and the NRM that some stakeholders felt would not have existed without the TIP Office projects. Stakeholders in Ethiopia and Kyrgyz Republic, countries that did not consider themselves to be implementing the NRM as noted in Section C.4, were more likely to describe TIP Office-funded projects as providing direct services to victims and financial support than they were in BiH and Namibia, countries that were further along in implementing the NRM.

Given the multifaceted nature of human trafficking, NRMs require a multi-disciplinary approach involving active engagement from government and civil society. TIP Office-funded projects involved—and in some cases helped develop and convene—multi-disciplinary teams. Nearly 75 percent of survey respondents agreed or strongly agreed that the NRM involved all relevant stakeholders (see Figure 4). However, all countries struggled with incorporating survivors as stakeholders into NRM processes. In some cases, interviewed stakeholders felt that it was too early in the process and noted that engaging survivors, while seen as important, could be traumatizing, if TIP stakeholders were not yet trained on the definition of human trafficking and how to be trauma-informed and victim-centered, or if victims were not in an appropriate place in their recovery to engage. As one stakeholder in Namibia explained: “As much as we would have wanted to have survivors to be part of the development of the NRM, at that specific time it was impossible. When we started implementing the project, we had to do a lot of training and advocacy to the government because there was disbelief there was trafficking happening in the country. [...] In order to engage a victim of trafficking you need to build that rapport. And at that time, we were still building rapport with them. It would not have been ideal to start having meetings of such a nature.”

Figure 4. Survey Question: The NRM involves all relevant actors

<table>
<thead>
<tr>
<th>The NRM involves all relevant actors from government and civil society</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
</tr>
<tr>
<td>Agree</td>
</tr>
<tr>
<td>Neutral</td>
</tr>
<tr>
<td>Disagree</td>
</tr>
<tr>
<td>Strongly disagree</td>
</tr>
</tbody>
</table>

Percentage of Respondents

15 From interview NAM10
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>51%</td>
</tr>
<tr>
<td>Neutral</td>
<td>10%</td>
</tr>
<tr>
<td>Disagree</td>
<td>10%</td>
</tr>
<tr>
<td>Strongly Disagree</td>
<td>6%</td>
</tr>
</tbody>
</table>

A common theme emerges when looking holistically across the sampled countries—namely, the general challenge of implementation. Figure 5 includes all the qualitative codes applied to the KII transcripts, with the size of the word corresponding to the frequency of its application.\(^\text{16}\) Challenges pertaining to NRM implementation emerge as the clear standout theme and is explored throughout the remaining evaluation questions and is a core feature of one of the tools developed and presented in Section C.6., Assessing NRM Effectiveness, in response to EQ6.

**Figure 5. Qualitative Analysis Word Cloud**

Below are country-specific case study narratives describing the projects selected in our sample and corresponding NRMs. These provide a high-level overview of the actors, roles and partnership effectiveness and challenges.

**Bosnia and Herzegovina**

*Identify the government institutions, civil society organizations, international organizations, and other actors involved in NRM systems within each studied country.* The pre-existing NRM in BiH was revised in the TIP Office-funded project to function at 18 levels, from the state to the entity to the cantonal levels, in line with BiH’s complex governing system. Formal members of

\(^{16}\) Annex VII contains a full-page view of Figure 5 for easier viewing.
the NRM include government ministries—such as the Ministry of Security, Ministry for Human Rights and Refugees, and Ministry of the Interior. The Office of the Prosecutor, the Federation of Police, and the State Investigation and Protection Agency also hold roles in the NRM, as does the Centre for Social Welfare (Sarajevo). Similar government institutions are found in NRM at the entity and the cantonal levels. CSOs/NGOs and international stakeholders, including IOM and the Council of Europe, are not formal members but may be called in as “associate members” on an as-needed basis.17

What is the role of each entity? The Office of the State Coordinator initiated the process in what was described as an open and participatory manner; the State Coordinator “personally engaged the international community and NGOs and led the process and now the implementation, supported by the Ministry of Security and international partners.”18 The Office of the State Coordinator, under of the Ministry of Security, leads the NRM, which is then implemented by regional monitoring teams.19 The Office of the State Coordinator is in charge of coordinating the development of strategic action plans, their submission to the Council of Ministers for approval, the coordination and implementation of all activities, and the analysis of data and revision of governmental strategy.20

How effective have they been in this role? What challenges currently exist for these entities? The Ministry of Interior assumes the role of coordinator between the entity and cantonal levels.21 This role is challenging due to the complex NRM and its many actors that mirror the complex governing system in BiH.22 Despite the challenges, the creation of referral mechanisms at the entity and cantonal levels was seen by all interviewees as necessary. One positive result of this revised NRM structure is that there are “now more people involved in the topic and [there is] better coordination between them.”23

A common challenge across the referral mechanisms at the entity and cantonal levels is that referral mechanism members are not sufficiently multi-disciplinary. As noted above, CSOs/NGOs and international organizations are only informally included in the NRM. Well-rounded victim assistance services, however, demand the formal inclusion of all relevant stakeholders, including CSOs/NGOs. One interviewee described the reduced effectiveness brought on by limited diversity of NRM members, noting that in some cantons the “mobile teams […] were not effective as they were not multi-sectoral.”24 Faith-based organizations were also identified as missing from the NRM, “especially in the cantons.”25 Faith-based organizations offer an important community perspective and several interviewees from BiH identified them as an important actor for prevention and victim support.

17 From interview BIH10  
18 From interview BIH01  
19 From interview BIH10  
20 From interview BIH01  
21 From interview BIH03  
22 From interview BIH10  
23 From interview BIH06  
24 From interview BIH04  
25 From interview BIH07
Ethiopia

Identify the government institutions, civil society organizations, international organizations, and other actors involved in NRM systems within each studied country. The development and implementation of the NRM was supported by two projects funded by the TIP Office: one by IOM and another by UNODC. Both projects were included in the evaluation to provide a more holistic understanding of TIP Office efforts that may contribute to the development and implementation of the NRM. While these projects had different goals, objectives, and activities, interviewed stakeholders confirmed that partners on both of these projects collaborated together and with government and NGO stakeholders, especially on activities primarily related to strengthening laws. Both UNODC and IOM played critical roles on past projects to build and strengthen the legal framework related to NRM and adjacent laws, build institutions, engage in capacity building, facilitate collaboration, and provide direct victim services and financial support. IOM’s work has been generally related to protection/service provision and victim identification through non law enforcement channels, while UNODC has directly engaged criminal justice stakeholders.\(^{26}\) In this way, their efforts are complimentary and critical. Without collaboration between investigators and service providers, victims may not receive the services and protection needed to willingly participate as victim-witnesses in criminal proceedings against their traffickers.

The overall goal of the UNODC project, “Enhance Effective and Victim-Centered Criminal Justice Responses to Trafficking in Persons in Ethiopia” (July 1, 2020 – June 30, 2024) is to “strengthen the Rule of Law through more accessible, accountable and effective criminal justice systems by enhancing the strategic and operational capacity of Ethiopia to respond to human trafficking and ensure access to justice and fair treatment for victims of human trafficking.” Two main objectives stated in project documentation\(^ {27}\) include: 1) Strengthening the capacity of the Witness Protection Directorate (which was established by UNODC through a previous award) to effectively provide victim assistance and witness protection in cases of human trafficking; and 2) Enhancing effective criminal justice responses to prevent, suppress and punish human trafficking in particular the problems of children in domestic servitude and commercial sexual exploitation. The project aims to ensure sustainability and institutionalization by promoting national ownership of the activities, conducting workshops as training of trainers, and consulting national stakeholders when developing training materials. Primary partners of the UNODC project include officials with the Witness Protection Directorate, Organized and Miscellaneous Crime Investigation and Prosecution Directorate, Crime Investigation Directorate, the Office of the Attorney General’s Prosecutor’s Directorate, the Federal Police Commission, and Criminal Investigation Directorates in several regions.

\(^{26}\) Criminal justice stakeholders include the Witness Protection Directorate, Organized and Miscellaneous Crime Investigation and Prosecution Directorate, Crime Investigation Directorate, the Office of the Attorney General’s Prosecutor’s Directorate, the Federal Police Commission, and Criminal Investigation Directorates in several regions.

\(^ {27}\) Department of State, Office to Monitor and Combat Trafficking in Persons. *Grants Officer Representative’s (GOR) Review of Progress Reports.* July 2021. On file with the evaluation team.
IOM has also been a longstanding partner working on NRM-related projects in Ethiopia for several years. The IOM project included in this study, Improving the protection of Victims of Internal and Transnational Trafficking in Ethiopia (March 1, 2020 – February 28, 2022) aimed to institutionalize and operationalize the NRM for Victims of Trafficking and Other Vulnerable Migrants in Ethiopia. This process included updating the NRM SOPs and developing a minimum standards document for service providers. Once finalized, the minimum standards document will be annexed to the updated NRM SOPs.

The focus of the IOM project was to intentionally operationalize the NRM in Addis Ababa. Since most of the country’s service providers are concentrated there, it is seen as a common transit area for victims of transnational trafficking and a destination for victims of internal trafficking. The capital is also closer in proximity to the National Council and National Partnership Coalition—responsible for the coordination of the prevention and prosecution of the crimes of trafficking in persons and smuggling of migrants, as well as the protection of victims of trafficking. The idea was to develop and cascade best practice from Addis Ababa to the local and regional levels. Primary project activities included conducting training of the trainers to national and regional service providers on case management and service provision; meetings to discuss revisions to SOPs, establishing a centralized data management system and hotline center, and partner with three NGOs to provide direct services.

IOM collaborated with key partners within the National Partnership Coalition, particularly its protection working group which included:

- Federal Urban Job Creation and Food Security Agency
- Office of the Federal Attorney General
- Ministries of Labour and Social Affairs (MoLSA), Women, Children and Youth Affairs (MoWCYA), Health (MoH) and their respective regional and local branches
- local health facilities, law enforcement agencies, and the judiciary
- international NGOs providing direct support to trafficking victims, including Hope for Justice (formerly Retrak), AGAR Ethiopia Charitable Society, and Good Samaritan Association (GSA).

What is the role of each entity? Prevention and Suppression of Trafficking in Persons and Smuggling of Persons Proclamation No. 1178-2020 established the National Council. The National Council carries out the functions of the NRM. The National Partnership Coalition

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28 IOM has been working on NRM-related projects in Ethiopia for at least two, but possibly more. NRM-related projects were funded to IOM prior to the project included in this evaluation. One project was “Enhancing National and Local Capacities for the Prevention of TIP and Protection and Reintegration Assistance to Victims of Trafficking and Vulnerable Returnees in Ethiopia” (S-SJTIP-16-GR-1004) from 12/01/2016 – 11/30/2018. This project provided technical assistance for the development of a National Referral Mechanism (NRM) SOP and built on a previous J/TIP funded project that built “capacity of the National Anti-Human Trafficking Task Force to spearhead and coordinate nation-wide efforts to combat human trafficking, develop a national action plan, strengthen the legislative framework, and contribute to the Government of Ethiopia (GoE) and civil society efforts to prevent and protect victims of trafficking.”


(NPC) is accountable to the National Council and ensures and monitors implementation, maintains the Referral System for coordination between the federal government and regional states, organizes regular stakeholder meetings, uses data to identify problems and sets direction for solutions. According to NRM Directive No. 562/2020, parties with a duty to cooperate to enforce the NRM include: 1) Ministry of Foreign Affairs; 2) Immigration, Nationality and Vital Events Agency; 3) Ministry of Labor and Social Affairs; 4) Police; 5) Ministry of Women, Children, and Youth and Regional Counterparts; 6) Ministry of Health and regional states counterparts; 7) Ethiopian Public Health Institute and regional states counterparts; 8) Attorney General and regional states counterparts; 9) Federal Cities Job Creatin and Food Security Agency and regional states counterparts; 10) Institutions at all levels working on rural job creation; 11) Federal Technical and Vocational Education and Training Agency; 12) microfinance institutions.

In December 2020, IOM supported the National Council to hold its first coordination meeting with the NPC (previously, the Task Force on Trafficking in Persons and Smuggling of Migrants). 30 participants attended, including ministers, regional directors, and state ministers. The Deputy Prime Minister and Attorney General led the meeting. The NPC presented the regulation on the NPC and directives drafted for the NRM, which the Council approved, and established the NPC enforcing the newly promulgated proclamation 1178/2020. IOM was commonly cited as being a critical support to facilitate meetings; some stakeholders doubted whether meetings would have occurred without IOM due to financial and human resource limitations.

How effective have they been in this role? What challenges currently exist for these entities? Both UNODC and IOM reported challenges in project implementation related to the COVID-19 pandemic, instability and conflict, and the national election. IOM also encountered difficulty finding an experienced consultant to assist with updating the NRM SOPs and experienced delays in the endorsement of government directives, including the NRM directive by the National Council of Ethiopia. The 2021 TIP Report and some interviewees also noted that Proclamation 1178/2020 needed to be amended to bring the definition of human trafficking in line with international law. Additionally, the TIP Report noted the need for training of stakeholders on SOPs on victim identification and the NRM, and training to improve their ability to differentiate between migrant smuggling and trafficking. It is worth noting that definitional misperceptions arose in multiple KII conducted for this study as well.

31 Ethiopia IOM Desk Review Document
33 Department of State, Office to Monitor and Combat Trafficking in Persons. Grants Officer Representative’s (GOR) Review of Progress Reports. July 2021. On file with the evaluation team. See also, Department of State, Office to Monitor and Combat Trafficking in Persons. Grants Officer Representative’s (GOR) Review of Progress Reports. October 2020. On file with the evaluation team.
34 Ibid.
35 After completing data collection activities, the ET was subsequently informed that Proclamation 1178/2020 had been revised.
As reflected in KII and desk review documentation, additional challenges expressed by government and NGO stakeholders included victim services being insufficient for the need, especially at the local level/outside of Addis Ababa, and perceptions that the government needs to take more accountability and ownership (in political will, human and financial resources) over the NRM, which is largely seen as not yet implemented, and a disconnect between the national level (which is perceived as relatively stronger) and regional levels. As one stakeholder noted, “The initiative/integration we see at the top structure can be seen as success element though there are still such challenges at the lower structures.” They went on to state “different stakeholders have different tools of standards for identification of cases/screening and lack of consistency across such tools employed created challenge with the victim's management.” Stakeholders acknowledged IOM’s work and TIP Office funding as critical to NRM development, but nearly every government and NGO stakeholder expressed a desire for more government ownership and accountability. Some stakeholders also recommended that larger portions of future funding streams for services be directed towards local NGOs, and that implementing organizations build capacity rather than provide direct services.

Namibia

**Identify the government institutions, civil society organizations, international organizations, and other actors involved in NRM systems within each studied country.** The IOM project in Namibia established a National Coordination Body (NCB) to lead national anti-trafficking efforts, including to support the creation of the NRM. The NCB is a multi-disciplinary body comprised of key government ministries, including the Ministry of International Relations and Cooperation, the Ministry of Home Affairs and Immigration, and the Ministry of Labour, Industrial Relations and Employment Creation; select CSOs engaged in anti-trafficking efforts, such as the Council of Churches of Namibia, Women Action for Development, and Lifeline/Childline; and international stakeholders, including the United Nations Children’s Fund (UNICEF), UNODC, and the U.S. Embassy. The NCB meets quarterly, with additional ad hoc sessions as needed. According to KII with government ministries, additional government stakeholders have since been added—notably the Office of the Judiciary, as a result of a recommendation from the Office of the Prosecutor General (an original NCB member).

**What is the role of each entity?** After the IOM project facilitated the establishment of the NCB, the government of Namibia subsequently led the process (with IOM support) of developing the NRM and SOPs. Project documents and KIIs highlight the leadership role taken by the Ministry of Gender Equality and Child Welfare (MGECW) in coordinating the NCB through the NRM development process to its ultimate approval and cabinet endorsement on 12 September 2018. The MGECW continues to lead and is named in the NRM as the National Coordinator.

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37 After data collection was completed, the ET was informed that the active TIP Office-funded project in Ethiopia is working to broaden government stakeholder engagement in the NRM, which would contribute to addressing this critique.

38 From interview ETH04


40 From interview NAM08
“responsible to coordinate national anti-trafficking programs and strategies.”

Other stakeholders have designated roles on the NCB and within the NRM according to their mandates and/or service offerings.

**How effective have they been in this role? What challenges currently exist for these entities?**

Stakeholders perceive the establishment of the NCB, led by the MGECW, and the development of the NRM more generally, as a success. Fundamental to its effectiveness is that it facilitates inter-disciplinary collaboration. An NGO stakeholder shared, “before the NRM we didn’t know who was doing what. [...] The NRM opened the forum for us to collaborate some more.”

The NCB provides a critical forum for stakeholders to better understand the anti-trafficking ecosystem, identify actors, and clarify responsibilities. That said, one government stakeholder shared that while the MGECW has taken a clear leadership position, “other government agencies have been slow to take on ownership.”

Interviewed government stakeholders and the implementing partner, IOM, also identified sub-optimal financial and human resources allocation by the government for human trafficking work.

The NCB actively recognizes the inclusion and role of CSOs in the NRM, which is seen as promoting the NRM’s effectiveness. Numerous interviewees in all stakeholder groups agreed that CSOs “are represented [in the NCB], and they can help ensure that whatever gaps are there from the government’s side, they can assist in filling the gaps.”

However, interviewees in all stakeholder groups overwhelmingly agreed that the NRM should include more local service providers. One interviewee whose organization works on counter-trafficking but is not involved in the NCB shared that “I’ve never heard anyone speak of [the NRM…]. I thought it was something going to be launched in the future, not something that has already been launched.”

More connections with local groups are needed. Interviewees also noted the exclusion of the Ministry of Education and private sector actors, which they see as necessary to better reach potential victims and fulfil NRM requirements.

**Kyrgyz Republic**

*Identify the government institutions, civil society organizations, international organizations, and other actors involved in NRM systems within each studied country.*

The IOM project facilitated the establishment of a multidisciplinary NCB led by the Ministry of Internal Affairs (MoIA) and Ministry of Labor, Social Protection and Migration (MLSSM). The NCB is further comprised of key government ministries, including the State Agency on Migration (later merged with MLSSM) and the then Ministry of Labour. According to KII with government ministries, additional government stakeholders have since been added—notably the Labor Inspectorate—on the recommendation of original members. The MoIA, as lead coordinator of the NRM, also created a network of 18 CSOs/NGOs to address the NRM development and implementation

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42 From interview NAM01
43 From interview NAM07
44 From interviews NAM07 and NAM10
45 From interview NAM08
46 From interview NAM11
process. Key CSOs/NGOs engaged in anti-trafficking efforts are thus part of the NCB, including such groups as the Public Association “El Agartuu” and the Crisis Center “Sezim.” Some NGOs such as Sezim, also have a memorandum of understanding (MOU) with the MoIA. International stakeholders are also in the NCB, including IOM, OSCE, and UNODC. At a later stage, additional stakeholders participated on a limited basis: Secretariat of the Council for Migration, Compatriots and Diasporas Abroad, the Kyrgyz National Parliament, the Ombudsman office, Ministry of Education, Judges and the Prosecutor’s office; as well as the ILO, Solidarity Center, and Winrock International’s U.S. Agency for International Development (USAID)-funded Safe Migration Project.

**What is the role of each entity?** Per the NRM, the national coordinating body meets on an ad hoc basis. KII and project documents highlight the leadership role taken by the Ministry of Internal Affairs in coordinating the inter-agency work through the NRM development process to its ultimate approval and cabinet endorsement in September 2019. The MoIA continues to act as the lead and is named in the NRM resolution as the National Coordinator “responsible to coordinate national anti-trafficking programs and strategies.” The MLSSM is the supporting lead on prevention and protection. Other stakeholders have designated roles within the NRM, according to their mandates and/or service offerings. Since February 28, 2022, after the project ended, cross-sectoral commissions were formed in 54 locations throughout Kyrgyz Republic, including governor and mayor’s offices. The commissions include representatives of authorized bodies enlisted in the decree (No. 493) and focus on identification, social navigation, and re-integration and rehabilitation of the trafficking victims.

**How effective have they been in this role? What challenges currently exist for these entities?** A major challenge was the disbandment of the lead agency, the State Migration Service, during the government reshuffle, which left a leadership gap. According to one interviewee, “that led to months of confusion about who was going to do what.” Although the MoIA now has clear ownership of the NRM on paper, stakeholders shared that significant additional leadership and action are required. One interviewee shared that in practice “ownership is partial, not full. This is related not only to anti-trafficking programs but to all programs that we have in the country. […] because of lack of funding it’s not always as effective as it should be.” The MoI is currently working towards amending enacted SOPs but are not yet working in practice. The commencement of COVID-19 lockdowns in March 2020, unfortunately, delayed their development and rollout.

Interviewees from across stakeholder groups further note that government officials involved in the NRM need additional training on the NRM and human trafficking issues more generally—especially due to the complexity of the NRM and human trafficking—to be able to identify human trafficking cases. Interviewees across stakeholder groups shared such training was particularly applicable to regional state officials for whom, as one interviewee shared, the NRM

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48 From interview KYZ10
49 From interview KYZ13

National Referral Mechanism Evaluation for U.S. Department of State TIP Office
“will be very heavy to understand and use.” Although government stakeholders appear to need additional resources to fully lead and implement the NRM, the NRM demonstrates close cooperation between government ministries and CSOs/NGOs. As noted in other country summaries, including Namibia, this is perceived as a positive for the NRM’s potential effectiveness.

**Conditions Facilitating NRM Implementation**

*What are some successful NRM governance systems IP has contributed to? Under what conditions have these systems been successful? To what extent have these systems been created to uphold human rights? (EQ2)*

The two most commonly cited factors facilitating success in implementing the NRMs in Namibia and BiH were: 1) *meaningful* high-level government commitment, and 2) multi-disciplinary collaboration. Other facilitating factors included coordination between national and local NRM actors, a culture of monitoring, evaluation, learning and growth, and strong legal frameworks.

**High-level government commitment.** Political will and leadership were the main themes regarding meaningful high-level government commitment across both BiH and Namibia, backed by strong leadership at the national/state level. Namibia’s strong leaders were actively engaged and highly committed, with clear roles and responsibilities from the national level, which set the tone and strengthened national and local partnerships. A key stakeholder stated that “the first step involved designing the NRM, selecting key stakeholders and placing it under the Deputy Prime Minister to chair—which shows high levels of commitment by the government.” BiH respondents also cited high-level government commitment as key to the development of the updated NRM. One interviewee shared: “I would say the strength of the current NRM is that there is political will on all levels.”

BiH was able to translate that political will into committed and sustained action at all levels in the way the government chose to structure and fund NRM positions—a key lesson learned for other countries. A KII respondent stated that “in terms of resources, the most critical element is that there was the will to develop or revise the NRM and commitment and agreement to do so by the relevant authorities, the Ministry of Security and the relevant ministries of interiors” at the various levels. “What we had in the past and why I personally believe it was not functioning, was that our NRM was built on an ad hoc basis... and its members were not motivated to do their best.” However, with members now feeling a part of the system, “when there is official nomination of the members of the NRM, when their role is recognized by the local governments, when they are paid extra for being members of the NRM, it’s completely different story.” For this to happen, there needed to be political will on the side of the relevant institutions and local governments, “not just to nominate members into NRM to satisfy the form, but to nominate representatives who will truly do the work.” One international stakeholder added the nuance that “political will, not just from the government more broadly, but from the specific ministries and

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50 From interview KYZ04
53 From interview BIH10
CSOs that need to be involved is really key,” further adding the importance of gaining clear insight into the exact nature of the political will and commitment of every NRM member.\textsuperscript{54}

**Multi-disciplinary cooperation.** NRM\textsubscript{s} require multi-disciplinary partnerships maintained through strong leadership and accountability structures, institutionalized policies and practices, and ongoing capacity building, supported by sustainable funding streams across both government and NGOs. One stakeholder from BiH eloquently reflected on collaboration as a circle that forms around a victim and observed, “It’s such a complex issue that not one institution can do the work on victim assistance or prosecution alone or in isolation.”\textsuperscript{55}

In BiH and Namibia, strong multi-disciplinary collaboration was key to successfully facilitating implementation of the NRM. Meetings are held regularly and frequently in both countries and are used to build in regular accountability.\textsuperscript{56} One interviewee shared that “there are committee meetings which aren’t just for government stakeholders but involve NGOs who are represented, and they can help ensure that whatever gaps that are there from the government’s side, they can assist in filling the gaps. For example, running shelters is quite expensive but NGOs and civil society can assist in such situations.”\textsuperscript{57}

Government and CSO stakeholders, from law enforcement to service providers, expressed the trust they had in one another and often spoke of successful examples of partnerships built on trust when it came to identifying victims and providing services.

In Namibia, the NRM enhanced the coordination of the relevant stakeholders, many of whom had not worked together prior.\textsuperscript{58} One interviewee reported that while the NRM is still new, “it has been working quite well so far. We are collaborating fine because we have been able to get to police, social workers; we have support for victims from the time they are identified.”\textsuperscript{59} In Namibia, there was a sense that collaboration allowed more efficient use of resources. One interviewee stated that “the referral network works well; we don’t all have resources, so our combined resources provide better outcomes in terms of response times and strategies.”\textsuperscript{60}

Stakeholders overwhelmingly indicated NRMs were most successful when the NRM clearly identified their roles and responsibilities and when they felt motivated, not forced, to work on the NRM and anti-trafficking more broadly. The ET asked stakeholders in all countries about MOUs, as a key indicator of formalizing partnerships and clarifying roles. While MOUs did not formally exist in most cases, other types of formalized agreements did exist—from directives to ministry officials and letter agreements with NGOs in Namibia, to formalized referral agreements among service providers in BiH that are structural and unrelated to anti-trafficking but help facilitate these partnerships in terms of roles and responsibilities.

\textsuperscript{54} From interview NAM12  
\textsuperscript{55} From interview BIH10  
\textsuperscript{56} From interview NAM08  
\textsuperscript{57} From interview NAM08  
\textsuperscript{58} From interview NAM10  
\textsuperscript{59} From interview NAM09  
\textsuperscript{60} From interview NAM06
National-Local Coordination. The BiH NRM is arguably the most complex global example of multi-disciplinary cooperation due to the unique structure of its government. Due to the high political will described above, and the technical assistance provided under the TIP Office-funded World Vision project, the NRM and regional monitoring teams (RMTs) were able to improve their cooperation and capacity to identify and refer more victims, as well as to standardize victim assistance across the country. This coordinated system, as one interviewee shared, means “the full circle is being closed.”\(^6\) To work effectively, NRMs need to engage the sub-national level. BiH is unique in its formal inclusion of multiple levels of government, with referral mechanisms at 18 levels of government at the state, entity, and cantonal levels. Though the structure of the government is distinct, BiH provides important generalizable lessons learned on thoughtful, coordinated rollout of NRMs to the local level.

Namibia also provides important lessons learned with respect to the roll out of the NRM to the local level and the inclusion of traditional community practices—with success evidenced by a high number of reported cases through traditional authorities. As one government stakeholder shared, “there are remote areas where you do not see police, and in these cases you are supposed to go to traditional authorities—all within the NRM. A lot of reported cases went through this system [of traditional authorities].”\(^7\)

Monitoring and Evaluation, Learning, and Growth. Both BiH and Namibia reported collecting and analyzing data from the NRM and data on identified victims regularly, and monitoring and adapting processes to improve effectiveness. BiH has set up a monitoring and evaluation system, through its RMTs, and uses data analysis in its annual reports to monitor the implementation of its action plan, identify trends, improve its strategy, and plan future activities.\(^8\) One interviewee noted that BiH’s statistics in 2020 and 2021 showed that “we have a much more successful investigations, prosecutions and verdicts related to trafficking. Even though the number of identifications is quite the same.”\(^9\) A strong culture of learning and adaptation, with the goal of victim identification and protection at the center, was evident in stakeholder interviews in BiH and Namibia. In addition, there was acknowledgement across stakeholders that there opportunities for improvement to be able to identify all forms of trafficking and to build capacity within certain regions that had not yet identified human trafficking cases. A BiH interviewee shared that the project strengthened collaboration, noting that “different regional monitoring teams are relying on each other, cooperating, advising, sharing learnings and best practices, and supporting each other.”\(^10\)

Based on the stakeholders interviewed, Namibia does not appear to have a formal monitoring and evaluation (M&E) process but maintained a culture of regular meetings for accountability, monitoring and assessing gaps, and inviting input across stakeholder groups. Growth in implementation was evidenced through Namibia reporting expanding stakeholder partnerships, citing examples of cases between CSOs and law enforcement, describing a culture of

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\(^6\) From interview BIH10
\(^7\) From interview NAM07
\(^8\) From interview BIH3
\(^9\) From interview BIH01
\(^10\) From interview BIH10
stakeholders being open to taking on more difficult cases—e.g., “There is a platform of different stakeholders and sometimes we bring a case that is difficult, and it is recommended for action.”66 This is critical, as the inability to do so can create adverse impacts throughout an NRM. As an international stakeholder reflected, Namibia is notable for “consistently showing their engagement for working on [anti-trafficking] and doing it without necessarily always having support from other donor funding. They are regularly performing and showing a lot of progress.”67

Legal and Policy Framework. Having laws already in place to support the NRM proved to be a key component for success. In Namibia, the NRM included SOPs, rather than waiting to develop SOPs until after the formal approval of the NRM; the government prioritized the document as a practical tool rather than simply reflecting an abstract ideal.68 “The national coordinating body felt that it is the utmost importance to draft the NRM in such a way that they will be able to use it, instead of it being a document that is just an ideal. We needed to be more practical on what is currently happening and what is currently available with regard to the number of social workers.” The stakeholder went on to say that there were frustrations with the length of time it took to pass the NRM (2018) and there are still amendments that need to be made, but “this was government-led and a government-driven process, so this was a well-received document and it really enhanced and changed the way things were being done.”69

As a result, one international stakeholder expressed, “Namibia is the only country I can ever say for certain that they are using the thing that they developed.” A stakeholder interviewed separately within the Namibian government later echoed “the NRM will never die, because it is a guiding tool for investigators, social workers, health officials, immigration—the referral mechanism is there to guide us on all [anti-trafficking] issues. It is not a document that will be shelved!”70

NRMs have been described in the literature and practice as “living documents” to be reviewed, revised, updated, and continually shared over time. Part of the strength in BiH’s approach relates to stakeholders’ ability to adapt in response both to internal and international pressure71 and lean on existing practices that were working well and revising others that were not. One interviewee stated that “in developing national action plan and action plans for the NRM and SOPs, we were first using all the good practices that existed in the country in the past. SOPs […] had been developed back in 2008 with USAID funding, Catholic Relief Services originally developed SOPs. Afterwards IOM did certain revisions with USG funding. Through this project we were not inventing new SOPs but looking at what exists in the country and building upon it. Wherever we could use any material or guidance that [already] existed, we were using it.” Being able to monitor implementation, learn from successes and challenges and grow and adapt in a coordinated and consistent way are crucial to successful NRMs.

66 From interview NAM06  
67 From interview NAM12  
68 From interview NAM10  
69 From interview NAM10  
70 From interview NAM13  
71 BiH was ranked on Tier 2 Watch List in the U.S. Department of State TIP 2020 report but is now on Tier 2, per the 2021 report.
**Human Rights Focus.** The survey included questions to explore the perceived alignment of country NRMs with promising NRM practices, grounded in upholding human rights, as identified in the literature. As indicated in Figure 6, over three quarters of all respondents felt their NRMs were aligned with the Palermo Protocol, respected the human rights of all trafficked persons, was gender-sensitive, non-discriminatory, victim and survivor-centered, trauma-informed, and included separate “best interest of the child” procedures.72

**Figure 6. Survey Question: The NRM and human rights**

<table>
<thead>
<tr>
<th>The NRM…</th>
<th>Strongly Agree/Agree</th>
<th>Neutral</th>
<th>Disagree/Strongly Disagree</th>
<th>Don’t Know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is aligned with the Palermo Protocol, covering all forms of TIP</td>
<td>86.27%</td>
<td>7.84%</td>
<td>5.88%</td>
<td></td>
</tr>
<tr>
<td>Respects the human rights of all categories of trafficked persons</td>
<td>80.39%</td>
<td>9.80%</td>
<td>9.80%</td>
<td></td>
</tr>
<tr>
<td>Is gender-sensitive</td>
<td>82.35%</td>
<td>9.80%</td>
<td>5.88%</td>
<td></td>
</tr>
<tr>
<td>Is non-discriminatory</td>
<td>82.35%</td>
<td>7.84%</td>
<td>7.84%</td>
<td></td>
</tr>
<tr>
<td>Is victim and survivor-centered</td>
<td>82.35%</td>
<td>7.84%</td>
<td>7.84%</td>
<td></td>
</tr>
<tr>
<td>Is trauma-informed</td>
<td>78.43%</td>
<td>11.76%</td>
<td>7.84%</td>
<td></td>
</tr>
<tr>
<td>Includes procedures to act in the “best interest of the child”</td>
<td>78.43%</td>
<td>11.76%</td>
<td>17.65%</td>
<td></td>
</tr>
<tr>
<td>Includes a wide range of specialized services for all categories of trafficked persons</td>
<td>60.78%</td>
<td>21.57%</td>
<td>17.65%</td>
<td></td>
</tr>
<tr>
<td>Includes long-term services for all categories of trafficked persons</td>
<td>52.94%</td>
<td>23.53%</td>
<td>21.57%</td>
<td></td>
</tr>
<tr>
<td>Makes comprehensive services available to VoTs during investigation</td>
<td>54.90%</td>
<td>17.65%</td>
<td>21.57%</td>
<td>5.88%</td>
</tr>
<tr>
<td>Makes comprehensive services available to VoTs during prosecution</td>
<td>50.96%</td>
<td>29.41%</td>
<td>15.69%</td>
<td></td>
</tr>
</tbody>
</table>

72 Lower levels of stakeholder agreement related to comprehensive and long-term services. This is discussed further in Section C.4., Conditions Leading to NRM Stagnation.
A vast majority, 87 percent, believed the NRM in their country covered both presumed and confirmed victims of trafficking,\(^73\) and 75 percent indicated their NRM outlined a separate process for victims of trafficking under the age of 18.\(^74\) Survey findings were mixed on whether certain categories or subpopulations of trafficking victims were ineligible for support through the NRM and mirrored KII findings across all countries. Forty-five percent answered that there were no populations excluded from NRM support, but 31 percent were unsure, and 23 percent stated that their NRMs did exclude certain populations.\(^75\) Notably, nearly three quarters of all survey respondents expressed that trafficking victims were sometimes or always required to cooperate with law enforcement to access assistance through the NRM. Figure 7 also indicates substantial lack of knowledge regarding key human rights protections, such as the storage and use of victim data among other topics, across countries.

**Figure 7. Survey Question: Perceived treatment of trafficked persons**

<table>
<thead>
<tr>
<th>Statement</th>
<th>Rarely/Never</th>
<th>Sometimes</th>
<th>Always/Often</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do not have their human rights respected during criminal prosecution</td>
<td>62.75%</td>
<td>11.76%</td>
<td>13.73%</td>
<td>11.76%</td>
</tr>
<tr>
<td>Are forced against their will to undergo invasive medical exams</td>
<td>50.90%</td>
<td>15.69%</td>
<td>13.73%</td>
<td>19.61%</td>
</tr>
<tr>
<td>Are forcibly returned to country to face torture, cruel, inhuman, degrading treatment/punishment</td>
<td>49.02%</td>
<td>7.84%</td>
<td>11.76%</td>
<td>31.37%</td>
</tr>
<tr>
<td>Are prosecuted or fined for involvement in prostitution</td>
<td>45.10%</td>
<td>15.69%</td>
<td>9.80%</td>
<td>29.41%</td>
</tr>
<tr>
<td>Are unable to continue education if witness in a criminal proceeding</td>
<td>39.22%</td>
<td>19.61%</td>
<td>15.69%</td>
<td>25.49%</td>
</tr>
<tr>
<td>Are deported without due process</td>
<td>37.25%</td>
<td>33.33%</td>
<td>15.69%</td>
<td>13.73%</td>
</tr>
<tr>
<td>Are barred from reentering the country they were trafficked in</td>
<td>31.37%</td>
<td>9.80%</td>
<td>21.57%</td>
<td>37.25%</td>
</tr>
<tr>
<td>Are unable to work legally if witness in a criminal proceeding</td>
<td>27.45%</td>
<td>19.61%</td>
<td>15.69%</td>
<td>37.25%</td>
</tr>
<tr>
<td>Face negative consequences by not cooperating with criminal proceedings</td>
<td>27.45%</td>
<td>25.49%</td>
<td>13.73%</td>
<td>33.33%</td>
</tr>
<tr>
<td>Are unable to testify anonymously if witness in a criminal proceeding</td>
<td>25.49%</td>
<td>21.57%</td>
<td>15.69%</td>
<td>37.25%</td>
</tr>
<tr>
<td>Have their names placed on police or immigration watch lists shared internationally</td>
<td>25.49%</td>
<td>21.57%</td>
<td>9.80%</td>
<td>43.14%</td>
</tr>
<tr>
<td>Have personal details stored in country of destination, forwarded to country of origin</td>
<td>19.61%</td>
<td>13.73%</td>
<td>23.53%</td>
<td>43.14%</td>
</tr>
<tr>
<td>Are required to cooperate with law enforcement to access assistance/services through NRM</td>
<td>13.73%</td>
<td>31.37%</td>
<td>41.18%</td>
<td>13.73%</td>
</tr>
</tbody>
</table>

Legend: Rarely/Never, Sometimes, Always/Often, Don’t know

---

\(^73\) See Annex I for full survey output.  
\(^74\) See Annex I for full survey output.  
\(^75\) See Annex I for full survey output.
Please indicate the frequency with which trafficked persons in your country experience the following:

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly Agree/Agree</th>
<th>Neutral</th>
<th>Disagree/Strongly Disagree</th>
<th>Don’t Know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do not have their human rights respected during criminal prosecution</td>
<td>62.75%</td>
<td>11.76%</td>
<td>13.73%</td>
<td>11.76%</td>
</tr>
<tr>
<td>Are forcibly returned to country to face torture, cruel, inhuman, degrading treatment/punishment</td>
<td>50.58%</td>
<td>15.69%</td>
<td>13.73%</td>
<td>19.61%</td>
</tr>
<tr>
<td>Are forced against their will to undergo invasive medical exams</td>
<td>49.02%</td>
<td>7.84%</td>
<td>11.76%</td>
<td>31.37%</td>
</tr>
<tr>
<td>Are prosecuted or fined for involvement in prostitution</td>
<td>45.10%</td>
<td>15.69%</td>
<td>9.80%</td>
<td>29.41%</td>
</tr>
<tr>
<td>Are unable to continue education if witness in a criminal proceeding</td>
<td>39.22%</td>
<td>19.61%</td>
<td>15.69%</td>
<td>25.4%</td>
</tr>
<tr>
<td>Are deported without due process</td>
<td>37.25%</td>
<td>33.33%</td>
<td>15.69%</td>
<td>13.73%</td>
</tr>
<tr>
<td>Are banned from re-entering the country they were trafficked in</td>
<td>31.37%</td>
<td>9.80%</td>
<td>21.57%</td>
<td>37.25%</td>
</tr>
<tr>
<td>Are unable to work legally if witness in a criminal proceeding</td>
<td>27.45%</td>
<td>19.61%</td>
<td>15.69%</td>
<td>37.25%</td>
</tr>
<tr>
<td>Face negative consequences by not cooperating in criminal proceedings</td>
<td>27.45%</td>
<td>25.49%</td>
<td>13.73%</td>
<td>33.33%</td>
</tr>
<tr>
<td>Are unable to testify anonymously if witness in a criminal proceeding</td>
<td>25.49%</td>
<td>21.57%</td>
<td>15.69%</td>
<td>37.25%</td>
</tr>
<tr>
<td>Have their names placed on police or immigration watch lists and shared internationally</td>
<td>25.49%</td>
<td>21.57%</td>
<td>9.80%</td>
<td>43.14%</td>
</tr>
<tr>
<td>Have personal details stored in a country of destination</td>
<td>19.61%</td>
<td>13.73%</td>
<td>23.53%</td>
<td>43.14%</td>
</tr>
<tr>
<td>Are required to cooperate with law enforcement to access assistance/services through NRM</td>
<td>13.73%</td>
<td>31.37%</td>
<td>41.18%</td>
<td>13.73%</td>
</tr>
</tbody>
</table>

NRM variants in all four countries reflected key human rights priorities on paper. Stakeholder perceptions about human rights were largely aligned in Namibia and BiH and mixed in Ethiopia and Kyrgyz Republic. Both BiH and Namibia were further advanced in NRM implementation compared to Ethiopia and Kyrgyz Republic and a focus on human rights in practice was especially evident in interviews with those stakeholders. Stakeholders from BiH and Namibia noted the importance of identifying and serving all victims of trafficking, incorporating the voices of victims and at-risk groups, and being thoughtful in community outreach and engagement with these groups (e.g., Roma in BiH). One interviewee in BiH stated that the NRM was created to uphold human rights, which is the main purpose of the NRM, through the provision of assistance and “access to justice in a dignified way.” Both countries place the holistic care of victims at the center of their work (a component of being victim-centered), and ensured that all stakeholders had clear roles and responsibilities for proper victim identification, protection, and safe return.

76 According to National Referral Mechanisms: Joining Efforts to Protect the Rights of Trafficked Persons—A Practical Handbook, Second Edition. 2022. https://www.osce.org/files/f/documents/f/5/510551_0.pdf, a victim-centered approach “shall mean the provision of services by States in a way that ensures trafficked persons are offered the assistance of highly qualified providers and ensure adequate access to justice, shelter, medical care, legal services, psycho-social counseling, culturally sensitive and native language support, and assistance for purposes of reintegration into society. This approach shall be in compliance with international standards, including non-punishment, witness protection, non-refoulement, reflection period, compensation, and access to justice.”


National Referral Mechanism Evaluation for U.S. Department of State TIP Office
Implementing organization, local CSO and government stakeholders interviewed about Ethiopia and Kyrgyz Republic were more mixed in their discussions of victims’ human rights. On the one hand, a CSO stakeholder in Ethiopia described providing holistic victim services, including basic services and job training and access to credit to prevent future risk of trafficking which is promising (as described further below). However, the organization has been challenged by the large influx of migrants and donor budget cuts, and has been unable to provide more than basic services to identified victims.78 One government and one CSO official interviewed described hearing some reports of victims of trafficking being arrested rather than identified as a victim or victims being held in prison due to a lack of shelter options.79,80 The Ethiopian government official stated “if victims of Amhara origin are found in some other localities, they come to us with the NRM and sometimes they explain to us that they experienced human rights violations by the bodies that arrested/found them. They lodge their complaints by saying that sometimes they did not get the care they need and that they encountered stigma and labeling sometimes instead. But other than what they told us we could not substantiate the information to know whether it is true.”81 Another government official stated that with respect to reintegration, “I do not believe that the process of returning the victims is fully to the humanitarian principles and standards. There are undertakings directly in violations of international agreements, and thus, there are gaps on this.”82

In Kyrgyz Republic, one stakeholder reflected an example of being victim-centered and human rights focused when they explained “well, the [human trafficking] victims is quite a special category. Their safety and confidentiality is a top priority while working with them. If a victim does not want to cooperate or being interviewed, there is no way to force them to do so.”83 A CSO official stated they were concerned about secondary victimization that may occur from referring victims to clinics or other government agencies for services when those agencies lacked a proper focal point who was trained. They also expressed concerns that a victim’s personal data would not be protected, emphasizing that every NRM stakeholder across local regions must be “compliant with the legal framework.”84 A government stakeholder from Kyrgyz Republic reported “The [human trafficking] victim centered approach was not used. The [human trafficking] victims were treated as regular victim, though the [human trafficking] law of 2005 foresaw the special treatment to [human trafficking] victims, such special guarantees from the government, those were not performed in practice.”85

Several NRMs appear to cover certain forms of human trafficking better than others, and some countries left categories of trafficking victims out of the NRM. For example, several BiH stakeholders mentioned the importance of inclusion of CSOs/representatives of the Roma population to address human trafficking for forced begging among street children. One BiH CSO interviewee stated that while the NRM for trafficking for sexual exploitation is clear, there is no

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78 From interview ETH7
79 From interview ETH15
80 From interview ETH2
81 From interview ETH2
82 From interview ETH3
83 From interview KYZ7
84 From interview KYZ8
85 From interview KYZ2
NRM for forced begging and corresponding legislation is not harmonized. In the absence of an NRM for forced begging, the CSO is working to develop protocols for law enforcement to use for identification and referral of suspected cases of forced labor and forced begging at the local level.\textsuperscript{86} A Namibian stakeholder believed that their NRM has focused on “all forms of trafficking. Victims are taken care of irrespective of the reason that they were exploited, regardless of the nature of exploitation.”\textsuperscript{87}

Figure 8. Survey Question: Quality of NRM Services

<table>
<thead>
<tr>
<th>Service</th>
<th>Don’t know</th>
<th>7.84%</th>
<th>11.76%</th>
<th>13.73%</th>
<th>17.65%</th>
<th>23.53%</th>
<th>27.45%</th>
<th>31.37%</th>
<th>35.29%</th>
<th>39.21%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assistance for domestic violence/abuse</td>
<td>5.88%</td>
<td>45.10%</td>
<td>27.45%</td>
<td>13.73%</td>
<td>7.84%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food and water</td>
<td>7.84%</td>
<td>5.88%</td>
<td>31.37%</td>
<td>17.65%</td>
<td>29.41%</td>
<td>13.73%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Psychological services</td>
<td>5.88%</td>
<td>9.80%</td>
<td>43.14%</td>
<td>23.53%</td>
<td>15.69%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reflection period</td>
<td>13.73%</td>
<td>13.73%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Childcare</td>
<td>5.88%</td>
<td>11.76%</td>
<td>49.02%</td>
<td>17.65%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Medical services</td>
<td>5.88%</td>
<td>11.76%</td>
<td>43.14%</td>
<td>23.53%</td>
<td>15.69%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safe shelter</td>
<td>9.80%</td>
<td>9.80%</td>
<td>29.41%</td>
<td>31.37%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Social services</td>
<td>5.88%</td>
<td>11.76%</td>
<td>41.18%</td>
<td>25.49%</td>
<td>11.76%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative procedures</td>
<td>5.88%</td>
<td>13.73%</td>
<td>35.29%</td>
<td>31.37%</td>
<td>9.80%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legal assistance</td>
<td>5.88%</td>
<td>13.73%</td>
<td>33.33%</td>
<td>23.53%</td>
<td>21.57%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access to information</td>
<td>17.65%</td>
<td>13.73%</td>
<td>37.25%</td>
<td>25.49%</td>
<td>9.80%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interpreters</td>
<td>11.76%</td>
<td>13.73%</td>
<td>37.25%</td>
<td>27.45%</td>
<td>5.88%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Return to country of origin/citizenship</td>
<td>5.88%</td>
<td>19.61%</td>
<td>27.45%</td>
<td>29.41%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Criminal Restitution</td>
<td>5.88%</td>
<td>19.61%</td>
<td>41.18%</td>
<td>23.53%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Immigration relief</td>
<td>5.88%</td>
<td>19.61%</td>
<td>41.18%</td>
<td>23.53%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education assistance</td>
<td>5.88%</td>
<td>23.53%</td>
<td>31.37%</td>
<td>27.45%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ability to sue trafficker(s)</td>
<td>5.88%</td>
<td>23.53%</td>
<td>31.37%</td>
<td>27.45%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>File civil claim for back wages</td>
<td>5.88%</td>
<td>27.45%</td>
<td>31.37%</td>
<td>27.45%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Living wage employment</td>
<td>13.73%</td>
<td>41.18%</td>
<td>9.80%</td>
<td>19.61%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial assistance</td>
<td>17.65%</td>
<td>37.25%</td>
<td>7.84%</td>
<td>27.45%</td>
<td>7.84%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\textsuperscript{86} From interview BiH10
\textsuperscript{87} From interview NAM09
## Conditions Leading to NRM Stagnation

*What are some less successful NRM governance systems IP has contributed to? Under what conditions have these systems stagnated? What are the challenges? (EQ 3)*

Stakeholders in Ethiopia and Kyrgyz Republic described their NRMs as being developed and formally approved, but not being implemented in practice, unlike stakeholders from BiH or Namibia.  

Ethiopian government and CSO stakeholders overwhelmingly reported that they did not view the NRM as implemented or functional and therefore they were not able to answer whether it was

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88 The list of services was compiled by consulting OSCE literature on NRM promising practices.

89 According to the Government of Ethiopia NRM Directive No. 562/2020 “Victims: ensure that their human rights are respected; follow up they are not kept/sheltered in the police station, detention center or prison; guarantee appropriate actions are taken when their rights are violated.” However, according to the 2021 TIP report some evidence of victims being held in police stations exists and there is uneven identification of victims of all forms of trafficking, such as, for example, male victims, children, and victims trafficked within Ethiopia/internally.

90 That is not to say that the NRMs in BiH and Namibia are without challenges, but the challenges these stakeholders described reflect common challenges faced as countries progress along stages of implementation of NRMs.
effective. When asked whether the NRM was functioning effectively, one CSO official responded that “on the implementation part there is significant limitation on putting such objectives into practice so I cannot say that the NRM has been implemented effectively. It requires further efforts.”

Similarly, another stakeholder working on the NRM in the Kyrgyz Republic stated:

“Unfortunately, it is only on the level of formality that [the NRM] is sustained. We have a governmental decree which says we have NRM. On practical level, unfortunately, this is not sustainable. Because there is no funding, there is no kind of follow up action, we are still struggling to adopt the SOPs with some of the institutions […] now we are good to go to practice it, to identify and refer, to launch this process in practice. Unfortunately, there is no sign of doing that.”

As another official noted, aside from increased interactions between stakeholders thanks to the coordinating bodies and project-provided trainings, “there’s actually been a limited number of victims identified under the NRM so I would hesitate to say that it is working completely as it was designed.”

As the quote above illustrates, despite the laudable effort of local government officials, working in partnership with TIP office funded implementing organizations, to convene multi-disciplinary stakeholder groups involving government officials and NGOs to draft and pass NRMs, efforts may stagnate, and further support is needed. Presented below are the common themes leading to stagnation learned from Ethiopia and Kyrgyz Republic including: 1) NRM structure, including leadership and partnerships, 2) legal framework, 3) political will and 4) government volatility (nearly the same themes that arose earlier in BiH and Namibia, though the reverse challenge). As described below, these issues may overlap and feed into one another. None of the challenges listed below are reflective of the projects themselves or of the implementing organizations. The ET did not find any challenges related to project design or implementing organization capacity or performance. Funding was a core challenge faced by Ethiopia and Kyrgyz Republic, and commonly cited in BiH and Namibia, so it is presented later in the section on common challenges faced across all countries.

**NRM Leadership.** Leadership challenges particularly plagued the development and implementation of Ethiopia’s and Kyrgyz Republic’s NRM. Reflected across interviews was the need not only for a clear leader (person and agency), but a leader with roles articulated, including enforcing and monitoring implementation of the NRM. One Ethiopian CSO official responded “it is just in emerging phase and far away from success. To this end, it needs a strong institution that owns the mandate… When there is a body who really owns the mandate, it entails not only drafting regulations and disseminating them but also controlling, identifying gaps, and

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91 From interview ETH03
92 From interview KYZ15
93 As described later, both countries also experience government volatility—the exact extent to which this contributed to leadership challenges within the NRM is unknown, yet it was identified as a contributing factor. Even in countries with more stable governance systems, unclear or ineffective NRM leadership can contribute to NRM implementation progress stagnating.

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tracking progress.” A local government stakeholder agreed “one challenge is there is no separate institution in charge of owning leadership for the NRM.” A strong theme that emerged from nearly every interview with government and CSO stakeholders in Ethiopia was the need for leadership coupled with accountability throughout all levels of the NRM—from the top nationally and locally.

In Kyrgyz Republic, one stakeholder mentioned “we have no specific state institutions who are coordinating all of these processes.” Turnover and reassigning leadership authority was a challenge and one stakeholder reported not viewing the new coordinating body (Ministry of Interior) as effective in its role as the previous, State Migration Services. Another stakeholder felt that, to work well, an interagency process must lead the NRM, rather than one of two entities. Additionally, they expressed that it wasn’t enough to assign leadership, but that “the coordination body has to be in place with political clout that may regulate and facilitate the work of all NRM bodies.”

**NRM Partnerships.** Leadership from the top (on the national and local levels) sets the tone for partnership. When leadership is ineffective, partnership suffers. Meetings may be informal and ad hoc; participation in meetings may be inconsistent and heavily reliant on outside donor funding to facilitate; partnerships may be limited excluding key stakeholder groups, such as individuals with lived experience, or heavily imbalanced towards more government or more NGO partners; partners indicate lack of trust and information sharing and any activities taken in the name of the NRM are more likely to reflect business-as-usual than align with SOPs (if developed). Additionally, MOUs may not exist or may be limited to donor project-specific activities and project periods rather than reflecting ongoing commitments to sustaining NRM roles and responsibilities. Roles and responsibilities are also unclear during this stage and may be overlapping, and there are no accountability structures, including monitoring and evaluation.

Stakeholders in Ethiopia and Kyrgyz Republic spoke at length about the challenges facing partnerships. In Kyrgyz Republic, stakeholders reported that government partners on the NRM are “not interested in development of joint actions or policies. We are at the stage where every agency keeps its block of function, no more, and don’t interact with other, including CSOs.” Stakeholders in Ethiopia also reported challenges with collaboration in the form of a “gap on information sharing.” The roles and responsibilities of both government and CSOs were reported to be unclear and at times overlapping, causing confusion on which actions should be taken. Across nearly every interview with government and CSO officials, they emphasized the need for role clarity and transparent accountability structures. While some stakeholders noted that partnerships at the national level appeared stronger and more formalized, such as the National Partnership Coalition, partnerships at the local level were especially challenged. As one
government official noted, “We are familiar with the personnel of the regions and even we communicate informally to request them to take the migrants from us sometimes. It is not effective with the NRM because formally we did not set the role of the destination/transmit/departure regions and as we did not define and sign MOUs across regions.” The lack of formalizing partnerships at the local level—through written documents outlining roles and responsibilities (whether MOUs or other formats)—connects to political will, and in fact may be the symptom of a cause, as described further below.

**Political Will.** A lack of political will was the second most prevalent challenge cited by government and CSO stakeholders in Kyrgyz Republic and Ethiopia. Government and CSO stakeholders described a lack of political will as a foundational issue undermining efforts towards implementing the NRM. Political will is not just having a single champion driving an effort. While champions are important in anti-trafficking efforts, NRMs require multi-disciplinary partnerships maintained through strong leadership and accountability structures, policies and procedures, ongoing capacity building, and supported by sustainable funding streams across both government and NGOs. As the staff of the implementing organization in Kyrgyz Republic noted, despite having a champion within a government ministry as their focal point, who has been involved historically in supporting the NRM, a lack of even higher-level government commitment has meant that the process to pass the National Action Plan has been stalled for over a year.

In both countries, international implementing organizations, supported by foreign donors, were described by government and CSO stakeholders as the driving forces behind NRM development and implementation, not their own governments. As one stakeholder from Kyrgyz Republic mentioned, “I see the key leading role in advocating NRM was IOM and other international organizations. I think what we need, even that times [development stage] and now [implementation stage], is the political will of the government in pushing this. If there is a good interest to push to implement it, I think we could have developed the SOPs much earlier than we are doing it right now. This is always the question to what extent is government interested to implement this.”

They went on to explain how they felt that as a result of international pressure, the government signed and agreed to international protocols and conventions without realizing what would be required to adhere to the commitment. This resulted in stalled efforts across national efforts including development and implementation of NRMs. As another person explained, the development of SOPs was stalled because agencies did not authorize to develop them and they lacked political support for the implementation process, which “will face the bureaucracy, resistance, problems, and time costs.” They further noted “maybe international organizations could advocate the adoption of the NRM. But it was … not the result of natural need.” Government and NGOs expressed similar themes in Ethiopia. A government stakeholder candidly remarked “there are evidenced gaps in terms of owning the commitment to such issues and having the mentality that IOM is working on our role that we should have done

101 From interview ETH2
102 From interview KYZ16
103 From interview KYZ02
104 From interview KYZ02
proactively.” Yet another stated, “Our service is dependent on the foreign support, but the federal/regions [local] should think that the issue is theirs and foreign bodies are supporting them on these. They are our siblings who are falling into the traps of such mess.”

The lack of political will may be a possible factor underlying low commitments of human and financial resources dedicated across both governments. There was a “shortage of professionals for the mandate at all levels” in Ethiopia, and work was “being done as add-ons as there is less ownership for the mandate.” Relatedly, there was a dismal assessment of the utility of recommendations for NRM improvement in Kyrgyz Republic, as it was noted: “Even if experts develop best recommendations there are two issues they face: one, funding, government tends to fund all via donors; two, understanding and support at highest political levels, which is lacking. Without it, all recommendations are useless. I think there is no political will and interest to support NRM.” When political will is not present at the highest national levels, it undermines leadership, capacity, and coordination among partners at the local level, ultimately resulting in less victims identified and served, and fewer cases investigated and prosecuted overall. Signing MOUs between and among NRM stakeholders may be a sign of forward progress in memorializing and sustaining partnerships, but it must be initiated out of political will. In Ethiopia, “IOM also pushed for the MOU to be signed between the regions, but the attention given by the government is not enough to make it happen.” A government stakeholder also remarked, “Just starting something, signing the MoU, and delivering some interventions here and there cannot take the initiative anywhere. There should [be] holistic implementation of the NRM to the fullest nationally with full-fledged system establishment.”

**Legal Framework.** Having a strong legal framework—both for anti-trafficking laws and “trafficking-adjacent” laws, such as migration, witness protection, civil labor codes, prostitution, etc.—sets an important foundation for effective NRM implementation. When laws are unclear or are conflicting, this directly impacts stakeholder conceptions of the definition of trafficking, and importantly who is and is not a victim. When legislation is unclear or stakeholders are not sufficiently trained on newly enacted laws, victims may go unidentified or in the cases of Kyrgyz Republic and Ethiopia, they may be arrested and charged with crimes. In addition to violating the human rights of victims, numerous interviewed stakeholders described arresting victims as leading to an overall lack of trust in institutions, hampering the willingness of victims to come forward in the future. In Kyrgyz Republic, stakeholders described the existence of overlapping crimes not defined as human trafficking, but meeting the international definition, leading to confusion among those in charge of identifying victims and enforcing the laws. Police were described as lacking “understanding of trafficking in persons” and “qualifying them [victims].”

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105 From interview ETH05
106 From interview ETH08
107 From interview ETH05
108 From interview KYZ2
109 From interview ETH06
110 From interview ETH12
111 In their responses to questions about trafficking, the language used by some Ethiopian and Kyrgyz officials reflected misperceptions of the definition of trafficking and conflating it with migration. There is also ongoing migration-related work in Ethiopia that overlaps with trafficking and may also contribute to this confusion.
112 From interview KYZ16
In Ethiopia, the efforts of government and NGO stakeholders, with support from TIP Office funding to IOM and UNODC, led to the passage of Proclamation 1178 in 2020, “a new and comprehensive legal framework,” which improved upon previous Proclamation No. 209/2015 since it was viewed as lacking “clarity, inconsistent with other laws and does not provide adequate responses to the problem.”\(^\text{113,114}\) One government official in Ethiopia described how even though there was a new legal framework that distinguished between immigration violations and trafficking victimization, some victims were still being arrested and held in prison for crimes committed as a result of being trafficked. This government official also explained how victims who were identified correctly as victims by authorities might still be held in prison due to a lack of shelter options.\(^\text{115}\) Capacity building was needed among first responders and the general public, as misperceptions of the law leading to a lack of victim identification led to feelings of mistrust: “I think there are several factors that influence implementation of NRM. Of course, lack of trust is one of the reasons. People […] don’t go to deal with law enforcement because of lack of trust.”\(^\text{116}\)

**External Threats: Government Volatility and Corruption.** Ethiopia and Kyrgyz Republic both suffered from government volatility. This was an external factor not linked to the particularities of NRM implementation but may have played a role in creating the challenging conditions described above. The reasons for government volatility are context specific, but to the extent other countries in the world may be at risk of similar upheaval, Ethiopia and Kyrgyz Republic offer important lessons learned applicable to NRM activities. One stakeholder reflected that Ethiopia had one of the strongest NRMs, yet “I always say you can’t go anywhere until the legislative foundation is there. I do think all the elements are there and are being addressed, it’s just the political volatility and the constant reshuffling of government is making implementation slow.”\(^\text{117}\) Similarly, in Kyrgyz Republic, “For one year, we have changed the government three times and the implementation, of course, when the responsible people and stakeholders are not in place, we don’t know from whom to request. And this challenge is very important.”\(^\text{118}\) Implementing organizations and TIP Office officials discussed government volatility as a challenge towards supporting the implementation of NRMs. Though in-country stakeholders did not ascribe government volatility to be the reason this may stem from the perspective of evaluating progress against project-specific indicators that are more timebound. A small number of interviewees mentioned general government corruption as a factor that may


\(^\text{114}\) According to interview ETH15, J/TIP recommended changes to the 2020 Proclamation as it was not seen as fully in line with the Palermo Protocol. As of the time of the KII (March 2022) these changes were “pending with the Council of Ministers to be passed as an addendum” and had been “pending since last year.”

\(^\text{115}\) From interview ETH15

\(^\text{116}\) From interview KYZ16

\(^\text{117}\) From interview ETH13

\(^\text{118}\) From interview KYZ14
inhibit the effectiveness of NRM implementation, specifically by negatively impacting victim identification and trust.\textsuperscript{119}

**Primary Challenges Across all Sites.** There are challenges that all sites, countries, and jurisdictions face as they move along phases of implementing the NRM. Understanding these challenges in the context of the 4 Ps of combating human trafficking\textsuperscript{120} is helpful in making sense of where a jurisdiction (national or local) is at any point in time as they work towards implementation of the NRM. There is a distinction between challenges that are somewhat typical “growing pains” versus those that may lead to overall stagnation of progress of an NRM. The themes outlined below represent challenges that arose across all four countries that are the most threatening to stagnation of progress/implementation of an NRM. Section C.6, Assessing NRM Effectiveness, provides tools to evaluate the effectiveness of an NRM once implemented.

**Funding.** In interviews and the online survey, stakeholders identified funding as the biggest need and challenge. Stakeholders overwhelmingly described international donor-funded NRM efforts as critically important. That said, there was a strong sense across countries from stakeholders within both government and NGOs that local governments needed to move towards dedicating and funding the partners and activities of the NRM internally.

As indicated in Figure 9, approximately 44 percent of stakeholders disagreed (35 percent) or strongly disagreed (9 percent) that their agencies received sufficient funding to participate in the NRM.

*Figure 9. Survey Question: My agency is sufficiently funded to participate in the NRM*

<table>
<thead>
<tr>
<th>My agency/organization is sufficiently funded to participate in the NRM</th>
<th>Percentage of Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>5.88%</td>
</tr>
<tr>
<td>Agree</td>
<td>9.80%</td>
</tr>
<tr>
<td>Neutral</td>
<td>27.45%</td>
</tr>
<tr>
<td>Disagree</td>
<td>35.29%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td></td>
</tr>
<tr>
<td>Don't know</td>
<td></td>
</tr>
</tbody>
</table>

\textsuperscript{119} Widespread government corruption was expressed as an acute challenge affecting the effectiveness of dedicated TIP stakeholder efforts in Kyrgyz Republic (Interview KYZ13). In Ethiopia, the need for accountability was commonly expressed by government and CSO stakeholders. One stakeholder stated a need for more government accountability moving forward to ensure there wasn’t financial abuse with the NRM budget but was speaking in general terms as a best practice. In BIH, corruption was mentioned as a general challenge in desk review documents.

\textsuperscript{120} The Four Ps of combating human trafficking: prevention, protection, prosecution, and partnership.
Funding needs were particularly acute for services—both government-provided and those provided through NGOs—as 37 percent of respondents disagreed or strongly disagreed that service providers received sufficient funding to fulfill the roles and responsibilities of their participation in the NRM (see Figure 10). In the cases of Ethiopia and Kyrgyz Republic, implementing organizations were more likely than in BiH and Namibia to take on the role of providing direct services and financial support. In Ethiopia, IOM played a critical role in directly engaging in service provision for identified victims through the project; however, some stakeholders recommended that moving forward, more funding should be dispersed to local NGOs with implementing organizations transitioning into more of a technical assistance and capacity building role to build service provision capacity locally and more sustainably.

**Figure 10. Survey Question: Level of agreement regarding NRM funding**

<table>
<thead>
<tr>
<th>The following agency has sufficient funding to participate in the NRM</th>
<th>Strongly Agree/Agree</th>
<th>Neutral</th>
<th>Disagree/Strongly Disagree</th>
<th>Don’t know</th>
<th>Null</th>
</tr>
</thead>
<tbody>
<tr>
<td>National government agencies</td>
<td>23.53%</td>
<td>25.49%</td>
<td>25.49%</td>
<td>25.4%</td>
<td></td>
</tr>
<tr>
<td>Local government agencies</td>
<td>17.65%</td>
<td>23.53%</td>
<td>29.41%</td>
<td>27.45%</td>
<td>23.33%</td>
</tr>
<tr>
<td>Law enforcement agencies</td>
<td>23.33%</td>
<td>25.49%</td>
<td>27.45%</td>
<td>23.33%</td>
<td></td>
</tr>
<tr>
<td>Service provider partners</td>
<td>25.49%</td>
<td>29.41%</td>
<td>27.45%</td>
<td>23.33%</td>
<td></td>
</tr>
<tr>
<td>NGOs/CSOs</td>
<td>23.53%</td>
<td>19.61%</td>
<td>25.49%</td>
<td>27.45%</td>
<td>23.33%</td>
</tr>
<tr>
<td>Civil justice agencies</td>
<td>21.57%</td>
<td>31.37%</td>
<td>23.53%</td>
<td>23.33%</td>
<td></td>
</tr>
</tbody>
</table>
Stakeholders discussed how shortages in service provision funding directly affected victim identification, case investigation and prosecution. Although the challenge was shared across sites, it was particularly acute in Ethiopia and the Kyrgyz Republic. In the Kyrgyz Republic one official reflected that low victim identification was due to the fact that “frankly speaking, currently there is no big difference if you are identified as victim or not. There is no special services for victims of trafficking.” One CSO explained how they lack funding from the government and are also penalized by the government for receiving foreign aid: “it is important to resist the attempts by Parliament members to label us [NGOs] as foreign agents just because we receive foreign money [as it’s unacceptable].” A CSO official stated “for two years reintegration and rehabilitation of victims [of trafficking] has not been functioning.” Another representative from a CSO described government budget and funding delay impacts on victim identification and service provision in stark detail:

“After a [trafficking victim] is identified by a medical staff at a clinic, they may want to refer [the victim] to our agency for temporary support as they may need food or employment or clothing or small business development, and our agency would be able to provide such support. However, at the moment, we cannot do that because there is no budget confirmed and no one has funds [to provide the support to victims in case they appear]. In July 2022, the 2023 budget will start being lobbied, and currently there are no funds.”

All services were in need across Ethiopia—especially at the local/regional level. A lack of shelters was cited by government and CSO stakeholders as directly impacting victim safety, service provision, and leading to a lack of cases investigated and prosecuted. One stakeholder described losing a case when a trafficker escaped prison and witnesses disappeared as a result of a lack of protection. One government official also described that shortages of local services led to the government only being able to send identified victims to the capital for services; however, funding was not available to then reintegrate victims back to their homes at the local-level, and as a result, they noticed some individuals were re-trafficked. Political instability also affected the ability of officials to reintegrate victims to regional states of Amhara, Tigray, and SNNP. In BiH one stakeholder described how services were strong in some cantons, but weak in others and as a result those cantons were identifying no cases of trafficking. Namibia established shelters but two CSO stakeholders reported they were not operational and as a result there were fewer victims identified. In the words of one interviewed NGO/CSO stakeholder in Namibia: “There have been challenges within the NRM, and … [this has] limited the support given to the victims. When I look at our data, we do not have a lot of data coming through from people who have been trafficked—it is because the system has actually failed us over the years. The system has been paralyzed over the years. There are now Places of Safety in place, however, I cannot confidently [say] whether they are fully functional as even till late last year they were still busy

121 From interview KYZ16
122 From interview KYZ09
123 From interview KYZ18
124 From interview KYZ08
125 UNODC’s project is working to strengthen witness protection in Ethiopia. However, it is currently working first at the level of changing laws and capacity building versus providing direct witness protection.
trying to put mechanisms in place. But you will hear that in every region there is a place of safety.”

In addition to service providers, a significant proportion of stakeholders disagreed or strongly disagreed that local government agencies (29 percent), law enforcement agencies (27 percent), national government agencies (25 percent), NGOs/CSOs (25 percent), and civil justice agencies (24 percent) had sufficient funding to participate in the NRM.

Findings from KII s provide further insight into funding challenges across sites. Related to government funding in Namibia, one CSO official stated that the government “was supposed to take over in terms of resources, but it is doubtful that there is significant budgetary allowance cost/sharing to address this issue. There seems to be a lack of national funding accountability.”

In Ethiopia the NRM was described as an unfunded mandate, “When such policy/proclamation is put in place it should have budget line for the NRM. No budget, no implementation.”

**Ongoing training and capacity building.** All interviewed stakeholder groups in all countries expressed the need for ongoing training on the NRM. It was also a strong theme in the survey. As Figure 11 below indicates, the majority of stakeholders (78 percent) across countries received formal anti-trafficking training. As described in Section C.2., TIP Office-Funded NRM Interventions, there is no doubt that TIP Office-funded efforts across countries contributed to high levels of training reported across stakeholders. However, a sizeable minority, roughly a fifth of all anti-trafficking stakeholders, had not received formal training on the NRM. This may be reflective of turnover, a commonly cited challenge to maintaining capacity individually and at the level of institutional knowledge, across sites. Importantly, nearly half (47 percent) of all anti-trafficking stakeholders do not receive ongoing training on the NRM.

**Figure 11. Survey Question: Receipt of formal and ongoing NRM training**

<table>
<thead>
<tr>
<th>Formal and Ongoing NRM Training</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>I received formal training</td>
<td>78.43%</td>
<td>21.57%</td>
</tr>
<tr>
<td>I receive ongoing training</td>
<td>52.94%</td>
<td>47.06%</td>
</tr>
</tbody>
</table>

126 From interview NAM02
127 From interview NAM02
128 From interview ETH02

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Key informants from BiH and Kyrgyz Republic reflected on the challenge of turnover and the impact on institutional memory and forward momentum on the NRM. As noted in BiH:

“Certain members who are experienced and trained and educated are just reassigned to other duties. That leaves the team and the NRM without transferring the knowledge to new colleagues. Then we are again at the very beginning and have the same challenges we are now investing in building their capacities. If something like that is not established, we will find ourselves in a few years having to do it all again. That’s the critical part. Either not to change members, which is hard to get, or at least have a system of transfer of knowledge and expertise.”

In some instances, implementing organizations utilized a “train the trainer” mode of training to help guard against loss of knowledge. A stakeholder in Kyrgyz Republic described the value of simulation or scenario trainings that ensure knowledge is “not left on paper, but [is] branded in the brains and memories of our employees.” However, there had not been “re-trainings and there are insufficient memory tools and structures.” Given that NRMs are considered “living documents” and that laws, policies, and practices are constantly evolving, there is a need for both sustainable in-country measures to embed ongoing training and capacity building for NRM stakeholders and for country stakeholder access to a larger, global community of practice to learn and evolve. Recommendations regarding efforts to institutionalize knowledge and learning from other countries and fields are in the Recommendations Section.

**Monitoring and evaluation.** M&E (and sustainability) across all sites is hampered by: 1) failure to designate, fund, and/or implement an M&E position/s; 2) a lack of clarity regarding NRM indicators and what is meant by NRM effectiveness on an international level (beyond timebound projects); and 3) insufficient data collection capacity to inform learnings.

All countries expressed a need for the global community (of which the TIP Office is a key actor) to first work on clarifying indicators or performance measures for NRM effectiveness beyond time-bound projects. This can help to set a basic standard against which countries can be supported to tailor their own measures. A stakeholder from Ethiopia captured this sentiment: “It is better if it is made institutional rather than running on project based. For instance, the State Department could still support […]but it should not be campaign-based operation; it should be institutionalized instead, meaning it should be supported with a target of making it more than a project.”

Designating and funding M&E positions and improving data collection capacity are the next steps (the how) once performance measures (the what) aligned with goals (the why) are clarified. The tools and discussion presented in C.6 can provide a useful framework for governments to

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129 From interview BIH10  
130 From interview KYZ04  
131 From interview ETH4
refer to when attempting to create M&E processes. Referring to the federal level an NGO stakeholder in BiH observed “we do not have set indicators for monitoring the success or gaps in the action plan. Responsibilities are not well defined—for one action there are 17 responsible institutions. It is not clear who will monitor that and how.” Similarly, as per a stakeholder in Namibia, the government has asserted a need for regular assessments of the NRM “to outline the current response by multiple governmental and non-governmental organizations in Namibia as well as to highlight potential problems experienced by trafficking victims and the extent to which those organizations interact for the benefit of trafficking victims.” However, KII across countries reflect that M&E is not happening in practice. As one stakeholder summarized, “it is difficult to see figures concerning the effectiveness [of the NRM] as there is no evaluation and monitoring” system in place. In Kyrgyz Republic, there is similarly no consolidated database. “The database that MOI and the State Migration agency had planned for anti-trafficking/NRM information exchange [was] adopted together with NRM. However, due to the State Migration Agency being abolished, work stopped. Now we are trying to re-start it.” Furthermore, data validity challenges regularly emerge. Official statistics on human trafficking do not align with the Palermo Protocol. For example, the Kyrgyz Criminal Code classifies illegal child adoption as a form of human trafficking, while the Palermo Protocol does not. There is also significant discrepancy in statistics reported by CSOs compared to the cases that formally reach government members of the NRM. In 2020 there were 8 cases reported by the MOI, while CSOs had 300 plus persons apply for assistance as victims of trafficking. No cases were prosecuted or reached the courts. This may be a result of the characterization of human trafficking crimes and local unwillingness to contact law enforcement. Similarly, a stakeholder in Namibia reported: “we lack during this time: computers—we only have one person trained to deal with the database to deal with issue of [trafficking], roll out to all 14 regions, there needs to be a focal point in all regions, centralized database.” M&E efforts in Ethiopia were reported by CSO and government stakeholders as mixed. A few stakeholders described working with IOM on trainings on M&E last year, though it was unclear whether the M&E was related to IOM’s project or the effectiveness of the NRM as a whole. According to a government stakeholder interviewed in Ethiopia, “the taskforce established is in the form of committee and it has 4 groups and when that became ineffective, Proclamation 1178 was issued and established National Partnership Coalition to create accountability with the mandate. But the coalition did not practice the entire mandate and it has members and 6 teams. The big challenge is that these are not promptly and fully enforced into implementation meaning the directive is not put into effect fully federally and regionally. NRM directive is issued and ratified in our region too, but it is not fully initiated on implementation. These 6 teams are not effectively conducting planning, M&E and the like so that this is a big bottleneck to the shortage of integration.” When asked about NRM effectiveness, another Ethiopian government stakeholder stated “the NRM is not implemented to the fullest. There is no established system of monitoring and evaluation either.”

132 From interview ETH8
133 From interview ETH10
134 From interview ETH3
135 From interview ETH10
136 From interview ETH12
Lack of M&E systems hinder ongoing effective implementation of NRMs across all sites since there is a lack of data to assess, reflect, and update implementation processes across a set of standard global and country-specific indicators. Data capacity is needed to support M&E.

**Sustainability.** Sustaining NRM implementation and moving towards more effective implementation of the NRM along the 4 Ps is related to funding challenges as described earlier, though not wholly remedied through funding alone.

As noted in BiH, “Currently there is one just employee (coordinator) exclusively working on the topic and sustainability of the system.”137 Similarly it was noted in Namibia, “I cannot say whether the NRM is sustainable or unsustainable. There is no collaborative effort within the group to work towards sustainability. Any initiative or anything that was to happen there has always been a challenge with funding. I never heard the Ministry saying here is “a million for [anti-trafficking] on the table. The human resources are available but, I mean the Ministry has put a lot of effort with the Places of Safety within the regions, but that is proving to be a challenge as they are now talking about putting volunteers in place to manage them instead of paid staff.”138 In Kyrgyz Republic, it was noted, “The government had to provide funding to maintain sustainability; however, it was not done.”139

Examples of sustainability approaches were offered across sites—institutionalization, dedicated funding by governments, revising laws to create permanent NRM agencies, or adding asset forfeiture provisions as a mechanism to fund services, as is the case in Ethiopia.140 Stakeholders echoed the need to think of the sustainability of NRM as a whole instead of simply the sustainability of time-bound projects. By and large, however, efforts to do so were not happening in a systematic way across countries. Implementation progress across all countries runs the risk of backsliding without sustainability planning. In the case of BiH, one stakeholder reported that this was already happening as current efforts were reinventing efforts from ten years ago that were not sustained.141 One stakeholder from Kyrgyz Republic perfectly captured the need for more systematic sustainability efforts: “In order to ensure sustainability, there has to be a strategy that would be developed for longer than half a year, longer than a year. Otherwise, it can happen that one agency gets support for solving one issue, then funding is given to another agency for solving a different issue, but there has to be a strategy that government and donors would follow and provide finance support.”142

137 From interview BIH03
138 From interview NAM03
139 From Interview KYZ09
140 This was suggested as a specific recommendation in Ethiopia by Interview ETH12. In BiH, one stakeholder noted that Republika Srpska’s monitoring teams would be sustained because “I don’t see a problem in their sustainability especially because the teams were formed without a time frame (long term). The government could only cancel them with a new decision, which in this situation I don’t see as a possibility that they would do. I think this a good way to development of the teams with the decision of the government is an excellent solution.” (BIH6)
141 From Interview BIH10
142 From interview KYZ09
Common Characteristics Across NRMGs

Do common characteristics exist across the various interpretations of NRM systems? Of these commonalities, are there any promising practices? Under what contexts/conditions? Can these commonalities be generalized across specific contexts? (EQ 4)

Exploration of the four sampled NRMgs revealed several commonalities, including (1) the need for clearly implementable NRM protocols, (2) the critical role of government ownership and advocating for anti-trafficking as a priority, and (3) the importance of connecting national anti-trafficking efforts with those at the local and regional levels. The NRMgs included in the evaluation sample saw varying degrees of success within each of these characteristics, but all reflected the common importance of these three themes. Documented experiences and related promising practices for each of these three themes are below.

Clearly Implementable NRM Protocols. The NRM can be considered in two ways—first, as a document that exists on paper and second, as an implemented protocol. As one USG stakeholder shared in an interview, on paper “the NRM is not the biggest problem […] but developing specific protocols that are implemented” is the challenge.143 This distinction was most visible when considering the extent to which NRMgs reflected—and operationalized—human rights principles and a victim-centered approach. As discussed above under EQ2 in Section C.3., Conditions Facilitating NRM Implementation, the sampled NRMgs were generally reflective of standard human rights principles on paper. A common challenge, however, was specifying the mechanisms, actors, and funding streams to ensure those principles could be effectively operationalized.

The example of Ethiopia provides a strong promising practice on how to develop an effective NRM on paper. Indeed, one interviewee shared that the Ethiopia NRM is “by far the most comprehensive, the strongest I’ve seen.”144 Specifically, it promotes the operationalization of human rights principles enshrined in NRMgs. The Government of Ethiopia drafted Directive No. 562/2020 to supplement the NRM. This directive includes specific mechanisms to promote implementation, particularly for delivering financial assistance and access to living wage employment for victims. Four agencies are charged with various aspects of economic development services for victims, including the Federal Cities Job Creation and Food Security Agency (and state-level counterparts), the Federal Technical and Vocational Education and Training Agency (and state-level counterparts), rural job creation institutions, and microfinance institutions.145 The specific roles and responsibilities for each agency are enumerated, including, for example, assessing the employment skills and subsequent training needs of victims, delivering business management and technical training to victims to support immediate employment, developing a mechanism to meet the credit needs of victims, and actively engaging victims in agriculture, mining, and other job opportunities, among others. While all NRMgs in the sample reflect the victim-centered principles, such as the need to provide victims with access to living wage employment and financial services, Ethiopia’s accompanying Directive is relatively

143 From interview BIH11
144 From interview ETH13
unique in naming the responsible agencies and establishing a framework to deliver on those principles.

Interviewees across all countries and stakeholder groups additionally mentioned the importance of harmonizing the NRM, legislation, and criminal codes, and ensuring alignment of all three with international anti-trafficking principles. For example, discrepancies between the NRM, other legislation, and the criminal code in Kyrgyz Republic are seen as hampering appropriate prosecution of human trafficking cases and limiting trust between victims and government agencies.146 In Namibia, there are differences in roles, responsibilities, and definitions between the NRM and the government’s official TIP Act; these differences can pose a challenge for implementation and create issues when “determining which document should be referred to in court” when prosecuting human trafficking cases.147 This issue is particularly challenging in BiH because “when it comes to canton legislation, there are different definitions of anti-trafficking, different definitions of victims of trafficking, different provisions when it comes to court proceedings.”148 The commonality of this experience highlights the importance of actively harmonizing anti-trafficking legislation and viewing the NRM as a living document that can be amended toward this end. As one interviewee shared, “the NRM is alive, […] it has to be further developed, added to, and improved” including through the development of “bylaws, regulations, and documents.”149

Government Ownership and Advocating for Anti-Trafficking Responses. As referenced throughout this report, government ownership of the NRM is critical to its success in both the short- and long term. Interviewees across stakeholder groups found it was critical to create a sense of urgency and prioritization around human trafficking and the NRM before substantive action could begin. This was true across all countries and contexts.

The extent to which individual projects had to cultivate government ownership was related in part to the pre-existing perceptions of human trafficking within national governments. In Ethiopia, for example, the government faced extreme domestic pressure to coordinate a meaningful response due to the number of trafficking cases seen in the country and the poor government response.150 TIP Office-funded projects, working in partnership with government and CSO officials, were instrumental in strengthening the legal and policy framework. As discussed above, however, both government and CSO stakeholders consistently stated that at high levels, the government could do more to dedicate human and financial resources to government ministries and CSOs to successfully operationalize the NRM in Ethiopia. BiH also had, to some extent, an existing sense of purpose to update their NRM. As one interviewee shared, “the most critical element is that there was will to develop or revise the NRM and commitment and agreement to do so by the relevant authorities” in BiH.151 There was a recognition among government stakeholders in BiH that the prior NRM was non-functional—or

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146 From interview KYZ16
147 From interview NAM13
148 From interview BIH10
149 From interview KYZ07
150 From interview ETH13
151 From interview BIH10
at least sub-optimal—and was ripe for revision. The project in Namibia called for more significant awareness-raising activities on the part of the implementing partner. Indeed, the extent of awareness-raising work ultimately contributed to a delay in the project because substantive work on the NRM could not commence until this groundwork was laid. As explained during an interview, the project had to request a no cost extension because “the relevant stakeholders were not aware of what trafficking in persons is and whether it is happening in country. We had to do a lot of awareness raising before we could get the political will” to proceed with the substantive work of developing the NRM. Not uncommon, the implementing organization found that technical teams within government agencies were largely on board with the project “but at the high-level it was another situation.” Awareness raising was a necessary precursor to meaningful work on the NRM, as emphasized by a stakeholder in Namibia:

“If we had done things a bit too fast while [government stakeholders] were not aware of what [trafficking] is, we wouldn’t have been able to draft the NRM. We first had to make sure that they are at least on board and understand what the issue is. And sharing the best practices from neighboring countries also helps for them to see this is not a foreign document we want to impose on them […] When they see that other neighboring countries are implementing a similar document, they are more interested.”

It is difficult to understate the perceived importance of such awareness raising activities around human trafficking and the NRM at the start of projects. As the above quote makes clear, implementers see advocacy work with key government stakeholders as an essential prerequisite for the effectiveness of the project and the successful development of the NRM. Additionally, interviewees cited continuing education as potentially necessary for the sustainability of project achievements and the ongoing implementation of the NRM. On one hand, continued awareness raising efforts and trainings within the government would help to ensure agencies are “prepared to evolve” and that attention is “given to new forms of [human trafficking], new forms of crimes, and new forms of exploitation.” Continuing education around human trafficking is seen by some as important to support the agility of human trafficking prevention activities in particular, so that approaches continue to be tailored to emerging trends rather than waiting until “our citizens are already victims.” Additional interviewed stakeholders observed that continued awareness raising may be needed to combat potential de-prioritization of anti-trafficking efforts by governments over time. This was particularly noted during interviews with stakeholders for the project in BiH, where the political situation is highly complex. As one interviewee shared, there is the risk that “we start having good results and then everything somehow stagnates.”

Several interviews mirrored these concerns, primarily with stakeholders outside the government. The Namibian Police Training College includes human trafficking in its permanent curriculum as does the Training Center for Prosecutors in Kyrgyz Republic, but various stakeholders raised the

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152 From interview NAM10
153 From interview NAM10
154 From interview NAM10
155 From interview NAM08
156 From interview KYZ05
157 From interview KYZ05
158 From interview BIH10
need to permanently enshrine anti-trafficking trainings within key institutions to enhance NRM sustainability.\textsuperscript{159}

The lack of survivor inclusion in the NRM development process appears to have been caused, at least in part, by the need to extensively cultivate a basic understanding of and sensitivity to human trafficking within government agencies. Stakeholders involved in project design and implementation referenced the mantra “nothing about us without us” and thus appear to appreciate the importance of including survivors in NRM. Nevertheless, none of the sampled projects included survivors in the NRM development process. In Namibia, the project had to conduct educational and awareness raising activities with government agencies to demonstrate that human trafficking did in fact exist in the country. The government was identifying few victims prior to the project. Yet even if there were identified victims, bringing them into the relatively uninformed and unsupportive environment that existed within the government at the start of the project would have been irresponsible. “In order to engage a victim of trafficking you need to build that rapport” and trust.\textsuperscript{160} Once government stakeholders were made more aware of human trafficking priorities and victims were being identified, the project period of performance was over.

The structure of NRM is another generalizable best practice that can enhance government ownership. First, nearly all interviewed stakeholders noted the importance that actors within the NRM be clearly identified and that their responsibilities be a clear and integral part of their job description. Reflecting on the prior NRM in BiH compared to the updated version created during the sampled project provides an important opportunity for comparison. One interviewee shared that “what we had in the past and why I personally believe it was not functioning, was that our NRM was built on an ad hoc basis.”\textsuperscript{161} NRM roles and responsibilities were haphazardly added to the jobs of social workers, police officers, and other government employees. Now, members of the NRM are nominated and their responsibilities are more formally incorporated into their work. This change in how NRM actors are selected promotes a sense of ownership, rather than a burden, among members.

The importance of multi-stakeholder partnerships to facilitate ownership in the NRM also emerged as a common promising practice. Interviewees across stakeholder groups noted the promising practice of multi-disciplinary national coordinating bodies as providing a platform for government agencies to take the lead and instill responsibility for the NRM and its implementation. For example, an interviewed NGO in Kyrgyz Republic recalled that at such inter-agency platform meetings “the Ministry of Interior consistently described to the NRM members their role and reminded them that the NRM had been approved by the government and therefore its implementation was obligatory to them.”\textsuperscript{162} An international agency stakeholder in Kyrgyz Republic noted that the multi-disciplinary national coordinating body, as well as inter-disciplinary trainings held by the project, have “resulted in more interactions between the

\textsuperscript{159}International Organization for Migration. Final Report, page 6. 2019. On file with the evaluation team. Also, interview KYZ05.

\textsuperscript{160}From interview NAM10

\textsuperscript{161}From interview BIH10

\textsuperscript{162}From interview KYZ07
Ministry of Interior and NGOs who provide services to trafficking victims.” While multidisciplinary coordinating bodies do not necessarily lead to a successful NRM that is fully owned by the government, these venues do seem to provide opportunities for leadership and coordination that are critical for the NRM’s success. In BiH, for example, certain government agencies report using these venues to actively solicit support from NGOs to fill gaps in the government’s approach and to help provide improved services to victims.

**Linking National and Local Efforts.** The importance of linking national-level NRM efforts with work at the sub-national level emerged as a common trend across the sampled countries. Interviewed stakeholders in Namibia and Ethiopia identified this theme as a challenge more readily than stakeholders from other sampled countries. BiH, with its complex structure, emerged as a potential promising practice for its innate consideration of sub-national structures and NRM responsibilities.

The importance of linking national and sub-national anti-trafficking efforts arose from the realization—as expressed by government stakeholders and interviewed NGO/CSOs—that victims are more likely to have first contact with local agencies. Numerous interviewees in Namibia and Ethiopia and, to a lesser extent, Kyrgyz Republic, agreed that “there should be a more coordinated way to involve regional [i.e., sub-national] players.” Various challenges were cited, including lack of inclusion of sub-national government stakeholders and service providers in NRM and SOP development, insufficient training of sub-national actors resulting in lower levels of awareness and sub-standard NRM implementation, and insufficient resources to facilitate cooperation between national and sub-national stakeholders. As one government stakeholder in Ethiopia shared, the robust planning and coordination at the national level “is not cascaded equally to the region/zone level.” Another Ethiopia government stakeholder went on to share that project implementer “IOM pushed for a memorandum of understanding to be signed between the regions, but the attention given by the government was not enough to make it happen.” This individual went on to share that resources, as well as commitment, were needed to facilitate greater national and sub-national coordination.

The NRM in BiH emerges as a promising practice in addressing sub-national geographies and agencies in the NRM. The prior NRM in BiH set unclear roles and impractical requirements for inter-canton coordination for the sake of appearances rather than outcomes; this set-up contributed to “a real conflict of responsibility” and made for a “quite ineffective” NRM. The revised NRM, produced during the sample project implemented by World Vision, is structured around 17 sub-national teams comprised of representatives from sub-national government, police, and service providers, with other relevant stakeholders joining as “associate members” where needed. Sub-national teams are complemented at the national level by the State Coordinator and the National Security Ministry, which may host coordination meetings and spearhead outreach with international partners. While the large number of sub-national teams

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163 From interview KYZ15
164 From interview BIH03
165 From interview NAM01
166 From interview ETH03
167 From interview ETH06
168 From interview BIH04
and their relative operational independence reflects the complex political situation in BiH, and not all sub-national teams are equally capable, the considered planning to design and implement an NRM at the national and sub-national levels to maximize functionality emerges as a promising practice.

1. Assessing NRM Effectiveness

How can the TIP Office determine whether an NRM is functioning effectively or not? (EQ7)

Tools/Checklists: How can the TIP Office determine country readiness for NRM-related programming? Should programming be conducted in phases? (EQ6)

As stated in the OSCE NRM Handbook (2022), “there is an urgent need to now harmonize NRMs within the OSCE region and beyond, to ensure a coordinated and effective response to human trafficking crime. This requires delivery of a cohesive, human rights-based approach from all NRM stakeholders, from national authorities to NGOs, which is victim and survivor-centered, gender-sensitive and trauma-informed.”

The evaluation team developed the NRM Promising Practices Assessment Tool (NPPAT), included in Annex V, to reflect both the development and implementation stages of an NRM and presents promising practices identified in the literature presented above in the discussion of EQ1 under Section C.1., Promising Practices in NRM Development and Implementation. The NPPAT is organized into the following categories:

- NRM Leadership
- NRM Partnerships
- Monitoring and Evaluation
- Data Collection Capacity and Sharing
- Legal Framework
- Identification
- Protection
- Investigation
- Prosecution
- Prevention

The NPPAT allows the TIP Office to conduct a high-level overview of where a country is in NRM development and implementation in each of the categories above and whether promising practices are: 1) not included in laws/not planning to be included; 2) being drafted or under review as law/policy changes; 3) enacted as law/policy; 4) being implemented; and 5) sustainable.

However, as the main finding of our evaluation suggests, the devil is in the details—or more accurately, in NRM implementation. But is it enough to say that a promising NRM practice is being implemented? How do we make sense of where a country or jurisdiction is with respect to

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169 OSCE also refers to protection provided at the moment of identification as “Identification +”
implementation at a more granular level to help provide insight into programmatic needs? To facilitate the answering of these important questions, the ET also developed the Implementation Phase Framework (IPF). The IPF provides further context, gleaned from insights from this evaluation and existing anti-trafficking research and practice, to help inform where a country is along phases of NRM implementation. The IPF was inspired by the Development and Operations Roadmap, which was developed by Erin Albright in collaboration with the IACP for the U.S. Department of Justice’s (DOJ) Enhanced Collaborative Model Human Trafficking Task Forces. Although NRMs have important distinctions in structure, operations, legal framework, and promising practices, findings from this evaluation suggest that countries (and jurisdictions within countries) may ebb and flow along phases of implementation. In short, countries and jurisdictions are unlikely to follow a linear, positive implementation trajectory. This evaluation found that implementation might be affected by political will, turnover, government volatility, lack of capacity building and sustainability planning, among other challenges. It is rare that any country or jurisdiction would be in the same phase in all measures, and even rarer to achieve phase 5—the highest level of implementation—on all measures. And as efforts advance and techniques become even more sophisticated in the global march to eradicate human trafficking, these phases will likely need updating.

Like the Roadmap that inspired it, the IPF should not be used as a checklist. Rather, it is meant as a guide for the TIP Office (and other practitioners) to understand a common natural progression of phasing along implementation and to help inform decision-making around future programming in the areas of NRM leadership, partnerships, monitoring and evaluation, data collection capacity and data sharing, legal framework, identification, protection, investigation, prosecution, and prevention. This can be used to help inform programmatic decision-making for NRM support along phases within categories. Phase determinations will likely vary across categories. For example, a country might be in phase 3 (middle level of implementation) for protection but phase 1 (lowest level of implementation) for investigations. This information can also be useful in making sense of existing project progress in moving a country along phases.

The NPPAT and IPF can and should be used locally (in as many locations as necessary) to obtain a more accurate assessment of a country as a whole. As this evaluation found, national level structure, partnerships, and activities may appear strong, but these efforts may not cascade

170 See Annex VI.
171 The Development and Operations Roadmap developed by Albright for IACP and US DOJ-funded Enhanced Collaborative Model Task Forces served as inspiration for the IPF.
172 Similar trends were seen in the Victim Identification Data Collection Systems (VID) evaluation, which DevTech executed simultaneously alongside the NRM evaluation. That both evaluations found countries oscillating between implementation phases strengthens the reliability of this finding.
173 This is not seen as much with DOJ-funded task forces since presumably there was political will from jurisdictions to apply for task force grants. That said, it can still be a factor if individuals grant applicants were the sole champions and left before funding was awarded or if task force stakeholders are not supported by the larger agencies in which they are embedded. Political will in this evaluation more often related to stakeholders with decision-making authority at high levels of national and local government not supporting NRM efforts in real, sustainable ways.
174 These tools naturally lend themselves to data visualization, which would facilitate ease of use and interpretation. See the Pan American Health Organization COVID-19 dashboard as a reflection of how the tool could be similarly visualized. https://www.paho.org/en/dashboard-preparedness-reception-covid-19-vaccines-americas
locally, affecting the country’s overall ability to identify victims, provide services, investigate, and prosecute traffickers.

While the NRM literature related to victim protection or service provision includes a significant number of promising practices, both inclusive of and independent of victim participation in an investigation and/or prosecution, the literature on NRM promising practices was vague with respect to case operations for investigators and prosecutors. The danger here is that without more context, we run the risk of assessing countries or jurisdictions based on sheer case volume, irrespective of the practices that led to those numbers (large or small). Countries may also suffer from confusion about standards. More important is the impact this has on survivor outcomes. Countries may report a high number of potential victims identified but may generate numbers using investigative techniques that are not trauma informed. Similarly, a country may report a higher rate of conviction in prosecuted cases, but that may be influenced by declining to prosecute cases deemed more difficult. Looking only at raw numbers, such a country may appear to be more successfully implementing the NRM compared to a country that may take on more challenging cases overall with a lower conviction rate. The good news is there seems to be current global consensus that investigations and prosecutions must be proactive, victim-centered, gender sensitive, trauma-informed, culturally congruent, evidence-based, and data-driven. The IPF draws on what we know from the field and from our evaluation to provide more insight into where countries are progressing in those areas.

The above discussion and accompanying NPPAT and IPF are designed to support practitioners in better understanding NRM development and implementation to inform programming decisions. But these are not NRM performance measures. Determining whether an NRM is functioning effectively or not requires:

1. Clarifying the goals and objectives of the NRM,
2. Developing and defining performance measures according to the 4 Ps,
3. Disseminating these measures to all stakeholders (national and local, government and NGO) and
4. Supporting the development of accurate data collection and reporting processes that go beyond case counts and provide more granular information regarding whether action,

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175 A concerning statement was shared by a TIP stakeholder in Kyrgyz Republic who thought the country needed to show a decrease in TIP cases in order to increase their standing in tier levels in the TIP Report.
176 TIP Report (2021), description of minimum standards. Also, one of the objectives of the U.S. DOJ-funded Enhanced Collaborative Model Task Forces, see E. Albright (2020).
177 As stated in OSCE (2022) NRM Handbook, “victim-centered and trauma-informed methods of working with survivors are integral to the success of this process [crime investigations].”
178 Adapted from OSCE (2022), Standard #14. “NRM procedures and services should be gender-sensitive, as well as being based on a developed national policy and strategy to address the gender dynamics of human trafficking. This should be tailored for victims of trafficking throughout the 4 NRM Pillars.”
179 OSCE (2022), Standard #19.
180 Adapted from OSCE (2022), Standard #20
181 E. Albright (2020).
182 Ibid.
including funded programs,\textsuperscript{183} within each of the 4 Ps is moving towards or away from these measures, and updating these measures over time, as needed.

If data collection systems are tailored, robust, and aligned with global and local performance measures across identification, protection, investigation, prosecution, prevention, and NRM structures (including leadership and partnership) they can provide further insight into understanding NRM effectiveness and the numbers of victims identified, provided protection, and cases investigated and prosecuted which can lead to more data-driven decision-making by countries and funders.\textsuperscript{184}

\textbf{A. Conclusions}

Overall, findings from the NRM evaluation indicate that TIP Office-funded projects have been instrumental in providing support for both the \textit{development} and \textit{implementation} of NRMs across Ethiopia, BiH, Kyrgyz Republic, and Namibia. TIP Office support was consistently cited as the most comprehensive and reliable source of funding for NRMs across countries.

Given the myriad facets of trafficking in persons, NRMs require a multi-disciplinary approach involving stakeholders from government and civil society. Incorporating survivors as stakeholders in the NRM process was a challenge in all contexts.

Regarding promising practices across sites, exploration of the four sampled NRMs revealed several commonalities, including the need for clearly implementable NRM protocols, the critical role of government ownership (and the role of projects in cultivating it), and the importance of connecting national anti-trafficking efforts with those at the local and regional levels. The NRMs included in the evaluation sample saw varying degrees of success within each of these characteristics, but all reflected the common importance of these three themes.

In fact, the most common factors facilitating implementation of NRMs were multi-disciplinary collaboration and high-level government ownership. Opportunities to enhance government ownership are also reflected in the structure of NRMs and can be taken as generalizable promising practices. Stakeholders in some countries, like Ethiopia, reported struggling because their NRM duties were unfunded add-ons to their regular duties. Stakeholders in BiH reflected on struggling with this challenge in the past, but they found success in revising their NRM so that members are nominated by the government with their responsibilities formally incorporated into their job descriptions.

Stakeholders in Ethiopia and Kyrgyz Republic described their NRMs as being developed and formally approved, but not being implemented in practice, unlike stakeholders from BiH or

\textsuperscript{183} Funded programs may have their own timebound performance measures. Where possible these should be linked to longer term NRM measures for a country and reflective of overall progress to achieve those measures.  
\textsuperscript{184} Please see the results of the Victim ID evaluation for further insights on this topic.
Outside of funding, but perhaps connected to it, the most cited factor impeding NRM implementation efforts in Ethiopia and Kyrgyz Republic was political will. This works both ways—stakeholders viewed a lack of political will as the reason behind the insufficient human and financial resources dedicated by their governments to address human trafficking; when anti-trafficking stakeholders receive insufficient funding and support from their governments, it led to a deteriorating sense of ownership and political will within and across stakeholders. When political will is not present at high levels on the national level, it undermines leadership, capacity, and coordination among partners at the local level, ultimately resulting in fewer victims identified and served, and fewer cases investigated and prosecuted overall. Ethiopia and Kyrgyz Republic were unique in the sample in that both countries suffered from government volatility. This was an external factor not linked to the particularities of NRM implementation but may have played a role in stagnating NRM implementation.

There are challenges that all sites, countries, and jurisdictions face as they move along phases of implementing the NRM. Understanding these challenges in the context of the 4 Ps is helpful in making sense of where a jurisdiction (national or local) is at any point in time as they work towards implementation of the NRM. Funding was cited by numerous interviewees and the majority of survey respondents as the biggest need and challenge faced across countries. There was a strong sense across countries and from stakeholders within both government and NGOs that local governments needed to move towards dedicating and funding the partners and activities of the NRM internally. Funding needs were particularly acute for victim services, including government-provided services and those provided through NGOs. Stakeholders discussed how service provision funding shortages directly affected victim identification, case investigation, and prosecution.

All stakeholder groups across all countries expressed the need for ongoing training on the NRM. It was also a strong theme in the survey. The NRM is a living document and requires updates to reflect new policies, revised practices, and amended laws. As such, anti-trafficking stakeholders require ongoing training. Natural turnover or turnover caused by government volatility negatively impacted institutional memory and, coupled with a lack of ongoing or institutionalized training, is a threat to forward momentum on the NRM across all sampled countries.

M&E and sustainability across all sites is hampered by a failure to designate and fund an M&E position/s, a need to clarify indicators measuring NRM effectiveness, and insufficient data collection capacity. Stakeholders across countries identified innovative sustainability approaches but spoke of an overall lack of planning for NRM sustainability. All stakeholder groups discussed a need to think of NRM sustainability in broader terms beyond project-based and time-bound definitions.

Given what was learned from the evaluation, how can the TIP Office determine whether an NRM is functioning effectively or not, country readiness for NRM-related programming? The DevTech evaluation team developed the NRM Promising Practices Assessment Tool to facilitate

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185 That is not to say that the NRMs in BiH and Namibia are without challenges, but the challenges these stakeholders described reflect common challenges faced as countries progress along stages of implementation of NRMs.
reflection on the \textit{development} and \textit{implementation} stages of an NRM. The content of the NPPAT is informed by promising practices as found in desk review of existing literature as well as identified through the 2021-2022 NRM Evaluation. The NPPAT is designed to facilitate a high-level overview of where a country is in its development and implementation of an NRM along ten core categories: 1) NRM Leadership, 2) NRM Partnerships, 3) Monitoring and Evaluation, 4) Data Collection Capacity and Sharing, 5) Legal Framework, 6) Identification, 7) Protection (or Identification+), 8) Investigation, 9) Prosecution, and 10) Prevention.

Promising practices and important considerations are identified within each category. These sub-components can be scored based on whether they are: 1) not included in laws/not planning to be included; 2) being drafted or under review as law/policy changes; 3) enacted as law/policy; 4) being implemented; and 5) sustainable. But as we found in our evaluation, more information is needed to understand implementation. Therefore, users of the NPPAT should refer to the accompanying Implementation Phase Framework (IPF). For each of the ten categories in the NPPAT, the IPF provides descriptions of what that category looks like along five implementation phases. These phases run from 1 (lowest level of implementation) to 5 (highest level of implementation).

\section*{B. Recommendations}

The ET has developed the following recommendations, informed by the evaluation findings and conclusions. These recommendations are directed at the TIP Office for implementation during the design and implementation of future strategies and projects.

\textbf{Bolster funding of victim services.} Victim services were described by government and CSO stakeholders as insufficiently funded across all countries and directly impact whether the human rights of victims of trafficking are being upheld, the number of victims identified and cases investigated and prosecuted. Implementing organizations funded to provide direct victim services should prioritize a more significant portion of this funding be allocated to local CSOs/NGOs with support to implementing organizations to serve in a capacity building role to improve long-term sustainability. Projects that include activities to create sustainable in-country funding sources for victim services, such as victim compensation funds or asset forfeiture legislation, to name a few, should also be prioritized alongside projects to train and build the capacity of stakeholders to implement the activities needed to realize them.

\textbf{Increase the focus on monitoring and evaluation.} Specifically:

- \textit{Work in partnership with global anti-trafficking experts across countries to develop and disseminate performance measures for NRMs that are not time-bound or project-based.} Global performance measures on anti-trafficking efforts that move beyond case counts are needed. Performance measures should provide more granular information regarding whether action, including funded programs,\footnote{Funded programs may have their own timebound performance measures. Where possible these should be linked to longer term NRM measures for a country and reflective of overall progress to achieve those measures.} within each of the 4 Ps is moving towards

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National Referral Mechanism Evaluation for U.S. Department of State TIP Office
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or away from agreed upon global minimum standards and promising practices. Finally, measures require updates over time, as needed.

- **Measure the impact on short-term and long-term survivor outcomes.** The ultimate determination of whether an NRM is functioning effectively is an assessment of an NRM’s impact on survivors along a range of outcomes. Survivor voices were absent from the development and implementation of NRMs in sampled countries. NRM development, implementation, and M&E frameworks must incorporate survivors in meaningful and respectful ways. Efforts to collect quantitative and qualitative data on survivor short and long-terms outcomes should be prioritized across all countries.

- **Encourage inclusion of performance measures in locally specific monitoring and evaluation processes and conduct M&E capacity building.** M&E frameworks, in line with global and locally defined performance measures, outlining how to monitor and assess the implementation of the NRM, are needed along with further capacity building on implementing M&E processes and improving data collection capacity.

- **Support targeted data collection and capacity building in countries further along in NRM implementation.** Countries further along in their NRM implementation, indicating a minimum of phase three in partnerships, investigation, prosecution, data collection, and monitoring and evaluation, could be prioritized for capacity building and funding around victim identification data collection at the government and NGO levels. If victim identification data collection systems are sufficiently tailored and robust, they can provide further insight into understanding NRM effectiveness for in-country stakeholders and funders.

**Encourage more concrete sustainability planning activities throughout NRM programming.** Prioritize sustainability as a topic for cross-country learning and sharing of promising practices. Develop plans that outline how programs, trainings, inter-agency coordination etc. will be sustained and by whom to address implementation challenges and loss of knowledge due to staff turnover. Share promising practices in creative sustainability approaches, including embedding trainings into agency practices and policies (e.g., police rollcall or academy trainings, CLEs, etc.); dedicating funding streams for NRM activities in legislation; engaging the private sector; strengthening asset forfeiture laws to help fund victim compensation; services and other NRM activities.

**Work with U.S. Embassy staff to monitor NRM implementation after TIP Office-funded projects end.** Possibly using the tools developed for this evaluation, work with U.S. Embassy staff to provide insights into a country’s NRM development and implementation following the end of funded projects.

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187 See findings in the VID evaluation, conducted by DevTech behalf of J/TIP, for more information on this issue.
188 Ashkenas, Ron (2013)
189 Interview ETH 13 suggested looking to UNODC’s computer-based training models implemented in Nairobi on other non-TIP topics for inspiration.
190 This is a more advanced level topic that may be more appropriate to program once a country shows further evidence of at least being at a level three of legal framework, investigation, prosecution, and partnership.
For countries stagnating in NRM implementation due to a lack of political will, consider tying future NRM programming to agreed-upon government commitments in human and financial resources as a condition to receive funding. These conditions can be relative (percentage based on a government’s annual budget and relative to investments in other social issues). Political will is a key factor leading to implementation or stagnation of an NRM (and effectiveness of TIP Office NRM programming investments). Look to the success of Child Protection Compact Partnerships\(^{191}\) for inspiration on how to tailor funding. If these conditions cannot be created, targeting programming around service provision and awareness raising locally and investing in NGO data collection systems may help generate the political will needed. TIP Report Tier rankings also make a difference—though more in some countries than others and should be used in tandem with other efforts. Additionally, including in the TIP reports the percentage that governments dedicate to anti-trafficking in annual budgets could be useful.

**Host inter-country conferences and/or a global anti-trafficking knowledge portal to share best practices and lessons learned and to promote cross-training and collaboration.** Stakeholders across countries expressed a desire to learn from other countries about common challenges and promising practices around protection, identification, investigation, and prosecution. Special attention should be paid to disseminating promising practices and sharing learning across sites with respect to creating and sustaining effective leadership and partnership structures.

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