

Independent project evaluation of the

**Comprehensive Corporate Toolkit for
Addressing Demand for THB**

HOME/2013/ISEC/AG/THB/4000005883

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TABLE OF CONTENTS

Abbreviations and acronyms

- I. Executive summary
 - Introduction
 - Background and context
 - Evaluation methodology

- II. Evaluation findings
 - Design
 - Relevance
 - Efficiency
 - Partnerships and cooperation
 - Effectiveness and Impact
 - Sustainability

- III. Conclusions

- IV. Recommendations

- V. Lessons learned

Annexes

- I. List of persons contacted during the evaluation
- II. Desk review list
- III. Evaluation plan

ABBREVIATIONS AND ACRONYMS

EU: European Union

ISEC: Programme Prevention of and Fight against Crime

NFS: Not for Sale

NGO: non-governmental organization

THB: trafficking in human beings

GTR: Generatie Tanara Romania

EXECUTIVE SUMMARY

Introduction

This report provides findings from the external expert evaluation of project HOME/2013/ISEC/AG/THB/4000005883. The anti-trafficking organizations Samilia foundation and its partner organizations received EC funding within the ISEC Programme to conduct a 19-month project about partnering with the private sector to raise awareness about trafficking in human beings, reduce demand and facilitate social inclusion of former and/or potential victims of trafficking.

The purpose of the present evaluation is to assess the degree to which project objectives were achieved, based on evaluation criteria of relevance, effectiveness, efficiency, impact, sustainability, partnerships and cooperation. The project description submitted by the partners to the European Commission set out the expected results. The evaluation covers the period from September 2014 to June 2016 and draws on information from a desk review of documents and record data, a number of interviews with beneficiaries, partners and staff, direct observation from participation in events and visits.

Overall, the evaluation finds that the programme has been successful in achieving its objectives and provides the right mix of outputs and activities to make a positive contribution towards reinforcing the role and tools available to businesses in combating trafficking in human beings. The evaluation finds that the most significant added value of the activities lies in its multi-stakeholder engagement and in the sustainability of its results.

Background and context

In late 2014 the Belgium-based Samilia Foundation launched the project “Comprehensive Corporate Toolkit for addressing Demand for Trafficking in Human Beings”, co-funded by the Prevention of and Fight against Crime Programme of the European Union. Building on existing partnerships and a track record of positive cooperation with the private sector, the project’s main objective was to “develop an approach for addressing the demand for Trafficking of Human Beings (THB) that can be implemented by companies in the private sector.” To this end,

Samilia and its implementing partners Reaching out (RO), Delhaize Brothers and co. "The Lion" (Delhaize Group) (BE), Asociația Generație Tinara (RO), IDEE MIGRANTI Onlus (IT), and NOT FOR SALE – Netherlands (NL) joined forces to develop a toolkit for private sector engagement targeting both the demand for and supply of trafficked workforce. The toolkit has been designed to include training guidelines for employees and resources for educating consumers, protect workers in the supply chain and create job opportunities for survivors of human trafficking. Strategies for reducing supply focus on how the private sector can best partner with civil society organizations and adopt responsible sourcing practices. With Delhaize as a trailblazer and case study, the project was aimed to engage six more companies in the awareness raising campaign and adoption of the toolkit.

Evaluation methodology

Based on the project description and upon agreement with the Samilia foundation, the present evaluation was intended from the outset as a summative evaluation with an aim to providing an overall assessment of the project's effectiveness and achievements. An evaluation plan has been developed and submitted to Samilia in September 2015 (Annex III).

The plan highlights the objectives, target groups and results contained in the project description which shall be subject to evaluation, and namely:

Objectives

Reduce demand for human trafficking (1.3) through:

- a) Increased awareness and knowledge of THB among Delhaize employees ;
- b) Increased awareness and responsibility of end customers regarding demand for THB;
- c) Enhanced corporate social responsibility programming and an increased level of consideration of human rights within Delhaize company operations;
- d) Increased level of education of beneficiaries in Romania and improvement of social inclusion programmes (1.1)

Target groups

- 25 victims of THB in Romania;
- 30 members Delhaize Group Management;
- 45.000 Delhaize Group employees in South East Europe and Belgium;
- 10.000 Delhaize Group customers in Belgium reached through the distribution of 10.000 anti trafficking awareness bags (1.1)

Activities

1. Creation of a Corporate Toolkit for addressing demand for THB (corporate code of conduct on human trafficking, training guidelines for employees, awareness campaign resources, guidelines for developing public-private partnership on civil-society engagement, guidelines for ethical and responsible production practices, and website);
2. Implementation of employee training and awareness by Delhaize Group, targeting employees in Belgium, Romania, and Greece;

3. Development of awareness campaign run by Delhaize in 10 selected stores in Belgium to increase awareness among its customers
4. Development of awareness posters in stores for employees in BE, GR, BG and RO;
5. Best practice implementation of public-private partnership on social inclusion programmes in Romania with Delhaize, Samilia and Not For Sale;
6. Conference on responsible supply chain management and ethical sourcing in Romania, including opportunities for integrating ethical commodities into supply chains.
7. Comprehensive Delhaize case study on the implementation of Corporate Toolkit
8. Development and support of educational and skills trainings for beneficiaries in Romania and design of textile products with Reaching Out in Pitesti, Generatie Tanara in Timisoara, Samilia and Idee Migranti. (1.1)

The selected methodology was aimed at revealing whether the project objectives were met, and the overall impact of the action. To this end, both formal and informal methods have been used to gather information, and namely:

- Progress reports compiled by Samilia (2.1.3);
- Project monitoring data and information provided by the Coordinator;
- Website and toolkit;
- Case study;
- Event reports;
- Interviews with project partners;
- Event evaluation forms;
- Site visit –Bucharest Conference;
- Summary timetable for implementation;
- SWOT analysis,
- Time-tracking;
- Observation.

SUMMARY MATRIX OF EVIDENCE, FINDINGS AND RECOMMENDATIONS

ACTIVITIES			
Activities	Evidence	Findings	Recommendations
Production of a Corporate Toolkit	All the deliverables have been completed, including the 1.corporate code of conduct on human trafficking, 2.the training guidelines for employees, 3.the awareness campaign resources,4. the guidelines for developing public-private partnership on civil-society engagement, 5.the guidelines for ethical and responsible production practices, and 5.the website.	<p>1. The corporate code of conduct is a succinct document addressing the issue of human trafficking in global supply chains. The code is intended to complement and strengthen existing supplier codes covering requirements on health and safety.</p> <p>2. The training guidelines for employees mirror the content of the online training developed for and administered to the employees of Delhaize.</p> <p>3. The Awareness Guidelines is a tool for companies that wish to support the fight against human trafficking by raising awareness among consumers and employees. The guide provides examples of how businesses can effectively communicate internally and externally about trafficking.</p> <p>4. The SWOT Analysis (Strengths, Weaknesses, Opportunities, Threats) is a first of its kind study on social inclusion as it relates to the training and employment of human trafficking survivors and those at risk of exploitation. It contains an analysis of the findings and lessons from social inclusion programs designed and delivered by both social agencies working for survivors' reintegration and also companies delivering opportunities to survivors in Europe and the U.S.</p> <p>5. The website businessagainstsavery.org regroups all the material</p>	The toolkit shall be disseminated as broadly as possible amongst the relevant target groups. The evaluation has noted that Samilia has launched a new initiative partnering with the private sector to hold business lunch workshops where THB-related issues are discussed. These events will offer an opportunity to further disseminate the toolkit. Similarly, the toolkit could be of great interest to the EU business coalition against human trafficking the Commission is setting up.

		produced as part of the toolkit, and is meant to provide “companies with resources and tools to help leverage their assets as a force for freedom.”	
Implementation of employee training and awareness by Delhaize Group, targeting employees in Belgium, Romania, and Greece	An online training for the employees of Delhaize has been developed and rolled out in Belgium, Romania and Greece.	<p>The merger between Delhaize and Ahold has slowed down the online training rollout, especially at the headquarters in Belgium, where such major developments created uncertainty amongst staff and required change management efforts. As a result, only a handful of managers took the training at the Headquarters, whereas in Romania and Greece, as of June 2016, around 1000 employees completed the exercise. However, Delhaize has expressed the intention of launching the training again at a later stage to engage a larger number of staff members.</p> <p>Moreover, according to the most recent feedback received by the partners, the management at the Ahold Delhaize is considering making the online training on THB a compulsory course within the new company and migrate the training to the internal IT platform of the group.</p> <p>Initially designed for use by the employees of Delhaize, the tool has been adapted for use by Interparking, a long-time partner of the Samilia Foundation, showing potential for replication beyond the project lifecycle.</p>	To increase outreach, Delhaize may consider adding the online training to its induction package or other employee training material.
Development of awareness campaign run by Delhaize in 10 selected stores in Belgium to increase awareness among its	The event took place, as planned, on the occasion of the EU anti-trafficking day 2015.	With the help of volunteers placed in selected Delhaize stores in Brussels, Samilia distributed the majority of the 10.000 bags produced with the pro-bono support	With low participation at media press conferences being very common in Brussels and elsewhere due to outlets being understaffed, and news release being easily

customers		<p>of the advertising agency J. Walter Thompson (JWT). The rest of the bags were distributed to participants in other events connected with the projects (conference, Samilia’s annual fundraising concert, press conference, etc.)</p> <p>A press conference was held a few days prior the awareness campaign. Samilia’s management and board members were present, together with managers from Delhaize. Regrettably the event was not well attended by the media.</p>	<p>accessible remotely, for the future Samilia may consider alternatives for its announcements such as:</p> <ul style="list-style-type: none"> -conference call; -tweets; -webcast; -blogger briefing; -youtube video.
Development of awareness posters in stores for employees in BE, GR, BG and RO.	<p>-Based on JWT’s concept and design for the anti-trafficking day awareness campaign, some 250 posters have been produced and posted in the Delhaize workplaces in Greece and Romania.</p> <p>-A short animated video has been developed and played in Mega Image stores in Greece and Romania.</p> <p>-Around 200.000 leaflets have been distributed in Greece.</p>	<p>The posters and video helped maximize the outreach effectiveness of the awareness raising campaign amongst Delhaize employees.</p> <p>The project document indicates a target of 44.000 employees (1.4). It can only be presumed that the target has been reached, as the findings of the present evaluation are limited to the process (distribution, placement and exposure) rather than outcome or impact (knowledge/awareness, saliency, attitudes, behavioural changes, etc.) due to lack of appropriate tools.</p>	<p>The awareness raising campaign delivered by Samilia and its partner is a typical public education campaign as it strives to bring about change in individual behaviours that can lead to social problems, or behaviours that could improve individual or social well-being. The present evaluation is limited to a back-end process evaluation, where only factors such as distribution, placement, and exposure are assessed. However, while important to measure project accomplishments, process evaluation does not capture campaign effects and is not meaningful from an impact point of view.</p> <p>In its future projects Samilia may wish to consider outcome evaluations that involve measuring the effects that come about in the target populations as a result of the campaign through methods such as, for instance, surveys and polling. This type of study would help evaluate the effectiveness and proximal outcomes of the campaign.</p>

<p>Conference on responsible supply chain management and ethical sourcing in Romania, including opportunities for integrating ethical commodities into supply chains.</p>	<p>The Conference took place in Bucharest on October 22-23, 2015. It was attended by 47 representatives from the European business and NGO community.</p>	<p>The Business Against Slavery conference was a central piece in completing the toolkit as it provided ideas as to what resources companies can use to address both the supply of and demand for human trafficking. During the conference Samilia and Not for Sale gathered insights from leaders of the European non-profit and business community to define the role of business in fighting human trafficking.</p> <p>In the absence of post-conference evaluation forms, it is hard to evaluate the event from the point of view of the attendees.</p> <p>The conference was well organized and well-run, taking place in a pleasant setting and friendly environment. It offered good opportunities for networking, inspiration and new ideas. The Conference objective, as stated in the project document (Annex I page 28), was to bring together 50 supply chain managers to examine ways for companies to incorporate ethical products into their supplies and “to increase attendees consideration of ethical alternatives”. The opening dinner was attended also by a representative of Interparking and Not For Sale Hale Sweden.</p> <p>Regrettably, Delhaize was the only company attending the whole conference, despite the fact that Samilia had extended the invitation to other companies. Besides providing input for the toolkit and opportunities for networking, the conference did not seem to have any special impact or multiplying effect. For instance, it would have been more effective to</p>	<p>The conference attendees have not received an evaluation form to fill out. It is standard procedure at EU co-funded events to gather participants’ feedback. Moreover, participants’ comments enable the organizer to better plan future events and tailor them to meet the needs of its audience.</p>
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		use the conference to showcase the commitment to the fight against THB of a market leader like Delhaize and stimulate a band-wagon effect.	
Comprehensive Delhaize case study on the implementation of Corporate Toolkit	The partners have come to realize that a study case on the implementation of the toolkit was unfeasible, as this component would have required the roll-out of the training at a very early stage of the project implementation and subsequent observations of the outcome and impact. The corporate toolkit required considerable effort, time and coordination from the side of the project partners. In addition, the restructuring within the Delhaize Group has further delayed the development and roll-out of the training and related toolbox. As a result, the partners have agreed to replace the case study on the implementation of the toolkit with a more generic case study on the Delhaize Group's sustainability strategy and their financial incentive program, written by PhD students from the University of San Francisco, under the supervision of Not for Sale.	The paper describes the Delhaize Group's sustainability program and illustrates how this sets the company as a model amongst corporations. The case study is meant to inspire other companies to act responsibly in the face of pressing environmental and social problems.	
Development and support of educational and skills trainings for beneficiaries in Romania and design of textile products with Reaching Out in Pitesti, Generatie Tanara in Timisoara, Samilia and Idee Migranti. (1.1)	Three workshops took place in spring/summer 2015 at the Reaching Out shelter for victims of trafficking in Pitesti, Romania.	Ten clients, four social workers, one workshop facilitator and one psychologist were involved in the workshops. Despite the drawbacks due to the young age of the girls and the untimely circumstances under which the training took place, as a result of the three workshops the girls acquired embroidery skills, and a collection was designed and produced in one sample. Through the project, the director of Reaching Out has established contacts with Mega Image (Delhaize chain	

		<p>stores in Romania) to gauge whether the collection could be sold in those stores. The organization has also been approached by other retailers who have come across the samples and have placed orders for their own stores. Idee Migranti has purchased one sample which has been sold through its distribution channels in Italy.</p> <p>Whereas the pilot yielded good results in terms of providing training to the victims and exposing both victims and NGO staff to a highly professional and efficient model of social enterprise, there were some drawbacks due to the young age of the victims and to an overall lack of proper preparation from the side of Reaching Out. The problems encountered by Idee Migranti during the implementation could have been anticipated, and avoided or mitigated by the receiving organization. It has been noted that Reaching Out was not Samilia's original partner for this project component.</p> <p>It is noteworthy that Idee Migranti has submitted a project proposal to Samilia as a follow up on the Pitesti pilot. The proposal is about establishing a social enterprise in Romania, in cooperation with an anti-trafficking NGO based in Bucharest, a long-time partner of Samilia, to manufacture a textile collection that shall be sold in Italy through Idee Migranti's distribution channels. Samilia is fundraising to allow for the</p>	
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		project to start in the near future.	
Target groups			
Activities	Evidence	Findings	
25 victims of THB in Romania	<p>About 10 victims of trafficking received training at the workshops organized by Idee Migranti at the Reaching Out shelter in Pitesti.</p> <p>About 15 young victims of trafficking sheltered or supported by the NGO GTR received financial support to cover the costs of their education and vocational training.</p>	<p>The three workshops conducted in Pitesti were considered a pilot project. This was the first attempt to replicate Idee Migranti's successful Guri I Zi project¹ elsewhere. It was also the first time Idee Migranti worked with victims of human trafficking.</p> <p>The response from the girls was lukewarm at the outset. The majority showed little interest in the project. Aged between 16 and 25, they tended to consider embroidery as an old-fashion activity, tiring and time consuming. They were constantly driven to distractions, and the trainers from Idee Migranti had to work hard, first and foremost to simply connect with individuals often highly traumatized and win their trust, and then to make them appreciate the importance of the learning opportunity they were offered. The girls started to show interest once they saw the high-quality and beauty of the textiles they weaved. Being accustomed to make small crafts as a hobby or therapeutic activity, they came to realize that with some training and practice they could make high-end products.</p> <p>Idee Migranti ended its mission with 10 girls and a facilitator trained and two home linen collections designed and produced in one sample. The collections were displayed at the Business against Slavery conference held in Bucharest on 22-23 October, and they were sold in Milan through Idee Migranti's distribution channels.</p> <p>There was little availability from the side of both Reaching Out and GTR to actively participate in the evaluation. Therefore, the findings related to the work of these partners are based on information collected through Samilia and Idee Migranti.</p>	
30 members Delhaize Group Management	Samilia run two workshops for Delhaize management; one in Belgium with 10 participants, and one in Romania with 15 participants. In addition, 2 managers from Delhaize Belgium and over 6 from Delhaize Greece and Romania took the online course.		

¹ <http://www.guriizi.com/>

<p>45.000 Delhaize Group employees in South East Europe and Belgium</p>	<p>-some 250 posters have been printed and posted in the Delhaize workplaces in Greece, Romania, and Belgium. The posters were placed in every restroom of every Delhaize store in Belgium and Luxembourg -147 stores in total. -a short animated video has been developed and played in Mega Image stores in Romania -200.000 leaflets have been distributed in Greece</p>	<p>Based on the available information, it can be somehow assumed that the awareness campaign reached out to the majority of the Delhaize employee population. Amongst the feedback received, Samilia reported contacts with the advertising agency Boomerang that proposed a joint postcard campaign over Christmas-New Year at reduced costs. As a result, 20.000 postcards were distributed in collaboration with the Brussels-based reception center for victims of trafficking Pag-Asa that Samilia involved in the project. Moreover, a free lance 'impro' theatre company reached out to Samilia after seeing the postcards and offered to put up a show to fundraise for Samilia.</p>
<p>10.000 Delhaize Group customers in Belgium reached through the distribution of 10.000 anti-trafficking awareness bags (1.1)</p>	<p>The majority of the bags, designed by JWT, were distributed at Delhaize stores on October 18, 2015. More bags were distributed on the occasions of the Business against Slavery Conference held in Bucharest and at the Samilia annual fundraising event that took place in Brussels in April 2016 where the Corporate Toolkit project was presented to the public with the participation of the Delhaize, Interparking and the European Commission.</p>	<p>Based on direct observation, participation in the events and the available information, it can be assumed that the awareness campaign reached out to the majority of the targeted customer population.</p>

EVALUATION FINDINGS

Relevance

The Corporate Toolkit project proposal referred to the ISEC objective 1.7.1.a: “stimulate, promote and develop horizontal methods and tools necessary for strategically preventing and fighting crime and guaranteeing security and public order.” The project referred also to the following ISEC expected results: “A reduction of the demand and supply of goods and services provided by victims of trafficking in human beings, for example by ways of raising awareness amongst potential buyers/users of such goods/services and the development of guidelines or codes of conducts for businesses to address trafficking in human beings; the establishment of public-private partnership is encouraged.”

In this respect, there is full consistency between the results attained by the project and the ISEC Programme objectives. Amongst the many relevant activities implemented by Samilia and its partners, the following can be considered as the ones that demonstrate full compliance with the Programme’s priorities:

- Development of a code of conduct for the business sector;
- Development of guidelines for the private sector on ways to address human trafficking;
- Establishment and reinforcement of partnerships between NGOs and private companies;
- Awareness campaign for consumers and employees.

The project is also in line with the EU Strategy towards the Eradication of Trafficking in Human Beings², notably with its key priority of working in concert with various actors, including the private sector, to step “up the prevention of trafficking in human beings” (2) The Strategy acknowledges that “cooperation with the private sector is also essential in order to reduce the demand for trafficking in human beings and to develop supply chains that do not involve trafficking in human beings.”

The project may also bring a valuable contribution to the European Commission’s efforts towards the establishment of a Private Sector Platform (Action 2). With its focus on providing resources for companies to address both the demand and supply for human trafficking, the project is fully in line with the coalition’s objective “to improve cooperation with businesses and other stakeholders, respond to emerging challenges and discuss measures to prevent trafficking in human beings, in particular in high-risk areas.” In particular, as stated in the Strategy, “the Commission intends to work together with the Coalition to develop models and guidelines on reducing the demand for services provided by victims of trafficking in human beings, in particular in high-risk areas, including the sex industry, agriculture, construction and tourism.”

Ultimately, the project objectives are in line with the principles that inspire the EU Directive 2011/36³ on preventing and combating trafficking in human beings and protecting its victims. In particular, with the project being aimed at supporting business in fighting human trafficking, there is a direct link to the Directives priorities of developing “measures to discourage and reduce the demand that fosters all forms of exploitation, and measures to reduce the risk of people becoming victims of trafficking in human beings, by means of research, including research into new forms of trafficking in human beings, information, awareness-raising, and education.”(25)

Efficiency

As per the UNDAC definition, for the purpose of the present evaluation, efficiency is understood as what “[...] measures the outputs - qualitative and quantitative - in relation to the inputs.” It has to be noted that the present evaluation was not meant, from the outset, to gauge the cost-efficiency of the activities undertaken, and the budget document has not been included in the documents submitted to the evaluator. However, some considerations can be made in relation to the project management, team performance, task management, and allocation of resources.

In the early stage of implementation, a new NFS project manager was appointed. Samilia volunteered to take over additional deliverables, with corresponding budget allocations. There has been some degree of disagreement concerning task division. The Samilia team felt it was left with a disproportionate workload, while NFS maintained the shift was not fully justified as it had the capacity to manage the tasks. In general, resources require focused attention to the task in order to deliver the highest quality work, and studies have shown that when individuals juggle more than three tasks simultaneously, the efficiency of their work is significantly hampered. Therefore, smaller assignments to staff members should be contemplated during the project design stage to help minimize confusion and produce better results. Moreover, over the course of the evaluation partners have identified actionable steps to improve team performance such

² 2012–2016 /* COM/2012/0286 final

³ 2002/629/JHA

as: a clear division of task roles and responsibilities and a mediation process to handle conflicts. These should make part of the work plan from the outset phase.

Another drawback has been the initial change of partner, with Reaching Out replacing Acsis, a Bucharest based NGO and long-term partner of Samilia. Down the line this shift affected the effectiveness of the workshops carried out by Idee Migranti, as the survivors assisted by Reaching Out, unlike the clients of Acsis, are very young and did not show immediate interest in the workshops and training opportunities they were offered.

Finally, the restructuring of the Delhaize Group has also posed considerable challenges during the project implementation. The company's crisis in 2014 that led to job-cuts in the thousands, and later its merge with Ahold did not ensure the best environment for the implementation of the project, both from the point of view of the implementing partners and of Delhaize managers themselves who had to engage managers and employees at a time when adaptation to change was already required of staff members and general feelings of uncertainty were widespread. This situation within Delhaize determined delays in the project implementation and some slight changes in the planned activities. The implementing partners and the managers from Delhaize have demonstrated great determination and commitment. Despite the difficulties, the expected results were achieved.

Partnerships and cooperation

The Corporate Toolkit project was carried out by the Brussels-based Samilia Foundation in cooperation with Reaching out (RO), Delhaize Brothers and co. "The Lion" (Delhaize Group) (BE), Asociația Generație Tinara (RO), IDEE MIGRANTI Onlus (IT), and NOT FOR SALE – Netherlands (NL). Samilia benefited from working with partners that share their vision and brought complementary skills to the action. The consortium was composed of experienced partners, with a balanced geographical distribution, significant expertise and commitment.

Overall the partnership was managed well, team performance was high and all issues were handled correctly, leading to a successful outcome for all involved. The team has implemented the project with a clear sense of direction and purpose, and the necessary flexibility and ability to adapt to changing circumstances and environments. The partners appreciated the possibility to amend deliverables and budget as the project developed to adapt the activities to growing and changing needs and opportunities.

Not for Sale

Not for Sale is an international non-profit organization that works to protect people and communities around the world from human trafficking and modern-day slavery. The organization equips and empowers survivors of human trafficking and those at risk of exploitation by providing shelter, healthcare, and legal services; education, job-, and life-skills training; and partners with leading companies and organizations to create long-term employment opportunities for survivors and at-risk communities. Founded in 2007, Not for Sale has grown into a team of 15 in San Francisco and over 30 world-wide.

Within the present project, Samilia partnered with NFS Netherlands. However, shortly after the start of the project implementation, some personnel reshuffling in the organization affected also the ISEC project causing some delays and hiccups in its implementation.

Within the ISEC-funded Corporate Toolkit project NFS was involved in most of the activities, with their main outputs being:

- The planning and execution of the Conference in Bucharest, in cooperation with Samilia;
- The e-book Business Against Slavery;
- The code of conduct for companies;
- The document “Awareness guidelines: Business raising awareness against trafficking”;
- The online training.

Delhaize

In 2010, the Delhaize Group set a bold vision for itself; to become the sustainability leaders in all their markets by 2020. Concurrently with changes in the top management, and in line with their corporate values, the company committed itself to a more sustainable food system by building sustainability into private brand products, reducing waste, promoting healthier living and employing a diverse group of associates that reflect their values and communities. The shift represented a step forward in the Group’s corporate social responsibility’s strategy, described as a “move from nice to have to must-have”⁴. For the new management, responsible business means embracing a bigger sense of purpose where making profit is no longer a goal in itself, but it implies engaging with communities to contribute to a better world. The underlying notion of responsibility thus not only includes delivering the financial performance results commonly associated with a corporation of the size of Delhaize, but also caring about associates and customers. Being one of the four companies in the food sector to be listed in the Dow Jones Sustainability Index, the Group aimed at developing an enabling working environment where associates understand and share the company values linked to sustainability, by way of receiving fair working conditions, demanding the same standards from local suppliers, and ultimately being proud of the company they represent. With respect to the customers, in addition to the short-term goal of avoiding scandals, the new strategy was built on the emerging profile of a responsible customer who wants to shop in a place he can trust, and who recognizes the value of diversity. Without explicitly recalling it, the Delhaize strategy seems to reflect the United Nations “Guidelines for Consumer Protection” for the retail sector, which include:

- Protecting consumers from hazards to their health and safety
- Promoting and protecting the economic interests of consumers
- Access to information to enable informed choices
- Providing consumer education, including education on the environmental, social and economic impacts of their choice
- Promoting sustainable consumption

This strategic approach reflects a concern common to several large-size corporations; how to build and maintain trust with today’s consumers. In the digital age, and notably with the coming of age of social media, business has realized that consumer trust can no longer be built

⁴ Marc Croonen, Head of Human Resources and Corporate Responsibility, personal interview, October 22, 2015.

exclusively on advertising, as people started having conversations at scale. Consumers research, review and share their experience. This shift in consumer decision-making has determined a move towards more transparency and authenticity driven by the emphasis on corporate responsibility. To remain competitive in the digital age, business leaders must understand their customers and their expectations in key areas such as sustainability, health and food safety.

The strategy, dubbed “Supergood”, reflecting on the corporate values of responsibility and integrity, focuses on 4 areas: quality assurance and food safety, associate diversity and development, global and responsible sourcing, and well-being. The contribution to the fight against human trafficking crosses different focus areas. One of the main strategy objectives related to THB is the commitment to ensure fair working conditions not only to their own associates, but also, more importantly, all along the supply chain. This goal is reflected in the Delhaize private brand supplier’s code of conduct that sets forth the minimum standards private brand suppliers and their business partners are required to meet regarding social compliance and fair working conditions. Such requirements include respect for workers’ rights, prohibition of discrimination, fair remuneration, respect for regulations concerning working hours, health and safety, age verification mechanisms to avoid child labor and the explicit prohibition for suppliers to engage in forced, bonded or trafficked labor. Compliance is ensured through quarterly internal and external audits and monitoring exercises.

Against this backdrop, the Group carried out its first anti-trafficking program in 2012 in Romania. The project aimed at offering vocational training opportunities for victims of human trafficking with the prospect of employment in the Delhaize stores. As a result of the project, the company hired 5 victims of human trafficking and delivered training and other services to approximately 12 survivors. Motivated by the positive results and good cooperation with Samilia and local NGO’s, the company has demonstrated interest in engaging further in anti-trafficking project.⁵

Within the ISEC-funded Corporate Toolkit project Delhaize was involved in:

1. The development and roll-out of a training module for its associates;
2. Social inclusion programs for survivors of human trafficking.
3. Awareness raising campaigns targeting customers and employees.

These activities bode well with the company’s strategic *Supergood* goals with regards to engaging with local communities, ethical sourcing and promoting associate diversity and development.

Idee Migranti

Idee Migranti is an NGO based in Italy, founded in 2006 with an aim to support and promote development cooperation projects, research and awareness-raising around topics like social entrepreneurship, community-led local development and women empowerment. Idee Migranti promotes corporate social responsibility within the business sector.

Its flagship project, Guri I Zi, launched in Albania in 2006, is a rural micro-enterprise program employing approximately 70 women in loom weaving, whose high-quality design home linen collection products are sold in boutique stores in northern Italy.

⁵ Costas Kalagyros, personal interview, October 2015

Idee Migranti's role in the ISEC project was related to the objective of increasing the "level of education of beneficiaries in Romania and [supporting their] social inclusion". The overall goal of the mission was to design a linen collection and teach the facilitator and the girls the basic stitching and embroidery skills. Idee Migranti sent two experts to Romania to hold three workshops that took place at the facilities of the NGO and reception center Reaching Out between May and July 2015. This was the first attempt made by Idee Migranti to replicate the Guri I Zi project elsewhere. Moreover, for the first time its experts worked with victims of human trafficking.

From the side of the beneficiaries, the workshops saw the participation of 10 girls, 4 social workers, a facilitator and a psychologist assisted by the Romanian NGO Reaching Out.

The response from the girls was lukewarm at first. At the outset, the majority show little interest in the project. Aged between 16 and 25, they tended to consider embroidery as an old-fashion activity, tiring and time consuming. They were constantly driven to distractions, and the trainers had to work hard, first and foremost to simply connect with individuals often highly traumatized and win their trust, and then to make them appreciate the value of the learning opportunity they were offered. The girls started to show interest once they saw the high-quality and beauty of the textiles they could weave. Being accustomed to work on small crafts as a hobby or therapeutic activity, they weren't aware of the professional and superior products they were being trained to make.

Idee Migranti ended its mission with 10 girls and a facilitator trained and two home linen collections designed and produced in one sample. The collections were displayed at the Business against Slavery conference held in Bucharest on 22-23 October.

The above report is based on interviews with representatives from Idee Migranti, and from the written reports they have submitted to Samilia. Despite the several attempt made to schedule a meeting, there has been no availability from Reaching Out to meet with the evaluator during the 2 day conference in Bucharest,

Generatie Tanara Romania (GTR)

GTR is a nongovernmental non-profit NGO with over 15 years of experience in anti-trafficking programs, including direct assistance to victims of trafficking. GTR was founded in 2001. GTR is run by 31 staff members and 150 volunteers.

As part of the Corporate Toolkit project, GTR was involved in the education and social inclusion program for survivors of THB (Work package 4). As a result, GTR has received funding to cover the costs of education and vocational training for 15 of its clients. The opportunities offered to the victims spammed from regular enrolment in high schools to vocational training in cosmetology and automotive services, according to their preferences.

The results achieved by GTR have not been extensively covered by the present evaluation because, despite the several attempts made to schedule a meeting with a GTR representative

during the 2 day conference in Bucharest, there has been no availability from the partner to meet with the evaluator.

Effectiveness and impact

The Samilia Foundation, in cooperation with its implementing partners, has delivered a significant volume of activities, including many not specified in the original project documents, but subsequently implemented either in response to stakeholder demand or to seize unanticipated opportunities for awareness raising –for instance, the Samilia Foundation’s annual fundraiser in April 2016, where the project results were discussed and presented with the participation of top managers from Delhaize and Interparking.

The evaluation confirmed that all the main activities were completed or in progress by the time of evaluation.

The project has made verifiable progress on promoting awareness-raising amongst consumers and employees and managers, to promote broader engagement of civil society and the private sector, and jump start capacity-building in the private sector through customized tools and manuals. The project has contributed to public awareness-raising through the media and its advocacy campaigns, but the impact of this contribution has proven difficult to quantify.

The evaluation was able to assess the high-quality of the completed activities based on stakeholder interviews, surveys, direct observation and participation in the events and desk research.

Considering that the project was only launched in late 2014 and that some major outputs are being finalized and are still to be made public, an impact assessment is premature. The lack of evaluable impact indicators, baselines and systematic end-user feedback further complicates the feasibility of long term impact assessment. On the other hand, the partners demonstrated sufficient programmatic engagement and resources to ensure a sustainable action for impact over the long-term.

Sustainability

Sustainability and continuity of results is one of the main strengths of the Corporate Toolkit project. This is due to a combination of factors. First, far from being limited to one-off activities (e.g. the Bucharest Conference and the awareness-raising campaigns), the action included capacity-building tools (e.g. code of conducts, online training, guidelines, website) that are likely to have sustained impact without ongoing funding. Furthermore, the focus on stakeholder ownership for the corporate toolkit also demonstrates appropriate design for sustainability.

In addition, Idee Migranti has developed a follow-up project plan to establish a social enterprise in Romania to employ victims of human trafficking and manufacture a textile collection to be sold in Italy through Idee Migranti’s distribution channels. Samilia is actively seeking funding to collect enough capital to start the project within the next 18 months.

Finally, it is noteworthy that the project results are embedded into the spectrum of activities and operations of the Samilia Foundation and Not for Sale, being organizations dedicated to

supporting the role of business in the fight against trafficking. For instance, Samilia has recently launched a new awareness-raising initiative consisting of lunch-time conferences with the Federation of Belgian Enterprises (FEB-VBO) to talk about corporate social responsibility in relation to anti-trafficking efforts and to promote the corporate toolkit. From its end, Not for Sale is going to promote the project website, as well as specific tools, through its website and social media, they plan to promote the online training tool to corporate partners, promote the ethical sourcing guidelines and code of conduct in their engagement with companies around responsible supply chain management (including publishing the sourcing guidelines to the NFS owned Free2Work.org website), and promote the tools internally and include them in their business and supply chain engagement strategy.

CONCLUSIONS

The Corporate Toolkit Project has been a unique and innovative experiment for its partners and, as such, holds a number of important lessons and best practices for non-profit and corporate stakeholders alike. Its strength lies in the practical assistance and tools especially designed for the private sector to encourage its active participation in the fight against human trafficking. Training is particularly crucial for supply managers, as they need to ensure ethical sourcing. However, making use of their communication reach, companies can also work to educate customers and employees on the issue of human trafficking by way of raising awareness. Finally, they can play a critical role by offering training and job opportunities to THB survivors.

The present evaluation offers the following conclusions:

- The Corporate Toolkit project has fulfilled its aims and met its program objectives, despite some unforeseen events like the restructuring in NFS Netherlands and in the Delhaize Group, and replacement of the Romanian NGO partner Acsis with Reaching Out. The management team has implemented the project with a clear sense of direction and purpose, and the necessary flexibility and ability to adapt to changing circumstances and environments.
- The project results are fully aligned with the ISEC Programme objectives, with the principles that inspire the EU Directive 2011/36⁶ on preventing and combating trafficking in human beings and protecting its victims, and with the EU Strategy towards the Eradication of Trafficking in Human Beings⁷, notably with its key priority of working in concert with various actors, including the private sector, to step “up the prevention of trafficking in human beings” (2) The project may also bring a valuable contribution to the European Commission’s efforts towards the establishment of a Private Sector Platform (Action 2);
- Based on very positive stakeholder feedback, across all respondent groups, trainees, staff, mentors and stakeholders the Program was found to have built the capacity of the participating organizations with evidence to suggest that Delhaize has acted as a trailblazer and will offer a case study for its improved capacity to 1) maintain an ethical supply chain, 2) build better understanding amongst customers and employees of what human trafficking is, and 3) develop social inclusion programs for THB survivors, 4) cooperate with NGO’s in a positive and constructive manner;
- The project has made verifiable progress towards raising awareness amongst consumers, employees and managers, promoting broader engagement of civil society

⁶ Council Framework Decision 2002/629/JHA of 19 July 2002 on combating trafficking in human beings. 2002/629/JHA

⁷ 2012–2016 /* COM/2012/0286 final

- and the private sector, and jump-starting capacity-building in the private sector through customized tools and manuals;
- Sustainability and continuity of results is one of the main strengths of the Corporate Toolkit project, as follow-up initiatives have been planned so that the benefits of the project can continue to be delivered to the beneficiaries and other constituencies after the EU funding.

RECOMMENDATIONS

- Delhaize senior management may consider making full use of the toolkit by way of incorporating the training modules into its induction package or other employee training package;
- The participating NGOs, and especially Samilia and Not for Sale, should disseminate the toolkit as broadly as possible amongst corporate partners, showcasing the examples of Delhaize and Interparking;
- In its engagement with the EU private sector platform against trafficking, the European Commission may wish to propose the toolkit as part of “the models and guidelines on reducing the demand for services provided by victims of trafficking in human beings” the Coalition is expected to develop and/or adopt,⁸
- In its future projects Samilia may wish to consider outcome evaluations that involve measuring the effects that come about in the target populations as a result of awareness campaigns;
- In its future endeavors the management team should consider measures to improve the quality of evaluation by way of engaging all partners –at the project inception phase- in the development of a well-articulated evaluation plan, laying the groundwork for the evaluation by preparing terms of reference, encouraging all project partners to actively participate in the evaluation exercise and distributing evaluation forms to all conference attendees.

ANNEX I

List of persons contacted during the evaluation

Sylvie Bianchi, Programme Manager, Samilia

Marc Croonen, Head of Human Resources and Corporate Responsibility, personal interview, October 22, 2015.

Alessandra Dentice, Designer and Trainer, Idee Migranti, October 2015

Elin Eriksson, Programme Manager, Not for Sale, October 2015

Elena Galateri di Genola, Founder and President, Idee Migranti, October 2015

Megan Hellstedt, Vice President of Sustainability, October 2015

⁸ *EU Strategy towards the Eradication of Trafficking in Human Beings (2012-2016)*" 2012–2016 /* COM/2012/0286 final

ANNEX II

Sources and desk review list

Delhaize Group Sustainability Progress Report 2014

Delhaize Group Private Brand Suppliers's Code of Conduct

Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims,

Council Framework Decision 2002/629/JHA of 19 July 2002 on combating trafficking in human beings.
2002/629/JHA

EU Strategy towards the Eradication of Trafficking in Human Beings (2012-2016)" 2012–2016 /*
COM/2012/0286 final

GTR website

Idee Migranti, project documentation, reports, website

Not for Sale website, reports and outputs

Prevention of and Fight against Crime (ISEC) Programme

Reaching Out website

Samilia Foundation, project documentation, report, outreach material, website, project outputs

ANNEX III

Evaluation plan

1. PROJECT DESCRIPTION

Objectives

Reduce demand for human trafficking (1.3) through:

- e) Increased awareness and knowledge of THB among Delhaize employees ;
- f) Increased awareness and responsibility of end customers regarding demand for THB;
- g) Enhanced corporate social responsibility programming and an increased level of consideration of human rights within Delhaize company operations;
- h) Increased level of education of beneficiaries in Romania and improvement of social inclusion programmes (1.1)

Target groups

- 25 victims of THB in Romania;
- 30 members Delhaize Group Management;
- 45.000 Delhaize Group employees in South East Europe and Belgium;
- 10.000 Delhaize Group customers in Belgium reached through the distribution of 10.000 anti trafficking awareness bags (1.1)

Activities

9. Creation of a Corporate Toolkit for addressing demand for THB (corporate code of conduct on human trafficking, training guidelines for employees, awareness campaign resources, guidelines for developing public-private partnership on civil-society engagement, guidelines for ethical and responsible production practices, and website);
10. Implementation of employee training and awareness by Delhaize Group, targeting employees in Belgium, Romania, and Greece;
11. Development of awareness campaign run by Delhaize in 10 selected stores in Belgium to increase awareness among its customers
12. Development of awareness posters in stores for employees in BE, GR, BG and RO;
13. Best practice implementation of public-private partnership on social inclusion programmes in Romania with Delhaize, Samilia and Not For Sale;
14. Conference on responsible supply chain management and ethical sourcing in Romania, including opportunities for integrating ethical commodities into supply chains.
15. Comprehensive Delhaize case study on the implementation of Corporate Toolkit
16. Development and support of educational and skills trainings for beneficiaries in Romania and design of textile products with Reaching Out in Pitesti, Generatie Tanara in Timisoara, Samilia and Idee Migranti. (1.1)

2. EVALUATION PURPOSE STATEMENT

Samilia and its project partners received EC funding within the ISEC programme to conduct an 198-month project about partnering with the private sector to raise awareness about trafficking in human beings, reduce demand and facilitate social inclusion of former and/or potential victims of trafficking.

The purpose of the project evaluation is to assess the degree to which project objectives were achieved, as indicated by the project leader in its proposal under section 2.2.3, which shall include a review of the evaluation carried out by the project partners with reference to:

- a) changes in awareness of THB amongst Delhaize employees,
- b) impact of the social inclusion program in Romania,
- c) impact of awareness raising campaign in Belgium.

3. PROJECT STAKEHOLDERS

Stakeholder participation throughout the programming cycle, including evaluation, ensures ownership, learning and sustainability of results. The project primary stakeholders have been identified in view to establish the relationships and networks necessary to successfully complete the evaluation and to respond to their specific interests.

Primary stakeholders	Role/interest
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European Commission	Founder/ Verify effective use of funding resources
Samilia	Implementing partner/ Learn to what extent the project has achieved its intended results and how they can be used/ May use the evaluation to design new programs, introduce change, or develop future strategies
Not for Sale	Project partner / Learn to what extent the project has achieved its intended results / May use the evaluation to design new programs, introduce change, or develop future strategies
Delhaize Group	Project partner/ Learn about the feasibility of the training and effectiveness of toolkit
Reaching out	Project partner /
GTR	Project partner /
Idee Migranti	Project partner / Learn about outcomes of “Guri I Zi” project model replication
Vlerick Group, Interparking, Packaging, Networks, HEMA, Walkins Juniper Nexis, Latham and Walkins	Secondary stakeholders/ Learn about the training piloting within Delhaize / Consider use of toolkit

4. METHODOLOGY

The present evaluation is intended as a summative evaluation with an aim to providing an overall assessment of the project’s effectiveness and achievements. The summative evaluation shall reveal whether the project objectives were met, and the overall impact of the action.

Where appropriate, the evaluation may highlight gaps, lessons learned or suggestions for project follow-up or replication.

To this end, both formal and informal methods will be used to gather information, and namely:

- Progress reports compiled by Samilia (2.1.3);
- Project monitoring data and information provided by the Coordinator;
- Website and toolkit;
- Case study (annex I, page 14);
- Event reports;
- Interviews with project partners;
- Event evaluation forms;
- Survey/focus group (for Delhaize employees) (2.1.3);
- Site visit –Bucharest Conference;
- Summary timetable for implementation;
- SWOT analysis,
- Time-tracking;

- Observation.

It is intended that over the course of the evaluation, methods may need to be revised or modified.

Interview questions

A set of questions have been chosen after the goals and objectives of the project to articulate the main issues that will be explored through the evaluation.

Evaluation questions related to **process**:

- Are the activities being performed as planned?
- Is the project reaching the intended target population?
- How satisfied are the participants with their involvement in this project?
- How should the planned activities be modified to work better?
- What lessons can we learn from the way in which the project is unfolding?

Evaluation questions related to **outputs**:

- Is the project reaching the intended number of participants?
- Is the project providing the planned services?
- Are the activities leading to the expected results?
- Are there any unexpected consequences?

Evaluation questions related to **outcomes/impact**:

- Did the participants (employees, victims, CEOs, secondary target group of retail companies) experience any changes in their skills, knowledge, attitudes, or behaviours? (2.2.2)
- What changes were expected?
- What are the effects of the project on the partner organization (e.g., organizational pride, enhanced networking, and partnerships)?
- Did the project meet the needs of the target groups? Do those needs still exist?
- Are there any other related needs that have arisen that the project did not address?
- What changes as were experienced a result of the project? Are the changes positive?
- What could be the long-term impacts of this work?
- How would you describe the European added value of the project? (2.4)

Evaluation questions related to **follow-up, sustainability and lessons learned**:

- What could have been done differently to complete the project more effectively?
- What key changes should be made to the project to enhance the achievement of objectives?
- What are the lessons learned for the future?
- What outcomes should be considered if an organization wants to repeat this or conduct a similar project?
- What activities will be sustainable once the financing has come to an end? (2.3.2)

5. TIMEFRAME

Refer to project document “Summary timetable for implementation”.

6. ETHICAL GUIDELINES

The evaluation shall be conducted in accordance with ethical guidelines for evaluation based on commonly held and internationally recognized professional ideals. In particular, the integrity of this evaluation shall be in line with the UNEG ethical guidelines for evaluation.⁹

Whereas all UNEG guidelines shall be taken into account, some principles apply specifically to the tools and methodology chosen for the present evaluation, and precisely:

Confidentiality: as far as interviews are concerned, evaluators shall respect people's right to provide information in confidence and make participants aware of the scope and limits of confidentiality. Evaluators must ensure that sensitive information cannot be traced to its source so that the relevant individuals are protected from reprisals.

Redress. Stakeholders receive sufficient information to know a) how to seek redress for any perceived disadvantage suffered from the evaluation or any projects it covers, and b) how to register a complaint concerning the conduct of an Implementing or Executing Agency.

Respect for Dignity and Diversity Respect differences in culture, local customs, religious beliefs and practices, personal interaction, gender roles, disability, age and ethnicity, and be mindful of the potential implications of these differences when planning, carrying out and reporting on evaluations, while using evaluation instruments appropriate to the cultural setting.

Keep disruption to a minimum while needed information is obtained, providing the maximum notice to individuals or institutions they wish to engage in the evaluation, optimizing demands on their time, and respecting people's right to privacy.

7. EVALUATION REPORT

The results of the evaluation will be compiled in a report and submitted to the Coordinator at the end of the project cycle, at month 18 (p.13).

The report shall include: explanation of the methodology and tools used, a summary of the results, interpretation of the results in connection with the project objectives, conclusions and recommendations.

Where appropriate, the report shall also reflect:

- The impact of change, describing significant changes that occurred during the project. Examples might include: change of sponsor or management, additions or deletions to scope, changes in management practice or project management approach, changes to assumptions, etc.
- The impact of constraints;
- Outstanding issues or concerns;
- Lessons learned and recommendations for follow up programs.

⁹ UNEG/FN/ETH(2008)