

Annex 7

Audit Trail: Comments (factual corrections and omissions) relating to

“Independent evaluation of UNIAP – Phase III (2007 – 2013)”

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Comments on draft evaluation report (factual corrections and omissions) in chronological order		Evaluation response
Royal Norwegian Embassy - 27/2/12		
1	<p>From the draft report, the total amount contributed by Norway was 2,435,280 US\$ and our contribution only covers objective 1 of the project. Please be informed that we have signed 4 Agreements/addendums with UNIAP to support both UNIAP and the COMMIT activities during 2007-2013 as the followings:</p> <ol style="list-style-type: none"> 1. RAS-04/005: NOK 3,400,000 for COMMIT was disbursed on 28.09.2007 (The total grant under this Agreement was NOK 6,800,000 for 2006-2007). 2. RAS-05/023: NOK 5,400,000 for UNIAP as core funds. The first payment of NOK 2,400,000 was made on 15.12.2006 for the expenses planned in 2007. 3. RAS- 07/007: NOK 5,000,000 for COMMIT. 2nd half of 2008-2010. 4. RAS-09/048: NOK 6,000,000 for COMMIT, 2011-2013. <p>Therefore, our support during 2007-2013 covers all objectives of UNIAP and the amount of contribution should be corrected. It is incorrect to look into only the present Agreement. Using the exchange rate of today, NOK 19.8 million is equivalent to 3,553,737.72 US\$.</p>	<p>Amendment. Figure of US\$ 3,901,006 was agreed after liaison with UNIAP as Norway's contribution to Phase III [Information in draft report had been provided and verified by UNIAP.]</p>
Embassy of Sweden - 29/2/12		
2	<p>Acronyms and abbreviations: SIDA should be Sida, Swedish International Development Cooperation Agency. Please replace SIDA to Sida throughout the document.</p>	<p>Amendment.</p>
3	<p>para.47: Sida proposal is not under discussion. UNIAP had requested Sida to be able to make use of the exchange gains accumulated under our agreement. This was agreed to in December when an extension of our agreement was made. No new contributions has been discussed.</p>	<p>Amendment. [Information in draft report had been provided and verified by UNIAP.]</p>
4	<p>Table 2: The Swedish contribution to phase III is 18 million Swedish kronor</p>	<p>Amendment.</p>

	<p>(SEK), which today is equivalent to 2 750 000 USD. In the table (or in a footnote), please put the sum in both SEK and USD and indicate what exchange rate you use, as our agreements are always in SEK and thus the sum in USD varies depending on exchange rates on the different disbursement/conversion days. Regarding the agreement time, Our ongoing agreement for phase III started on the 1 March 2009, which is the date that should be in the table. The amendment signed in December 2011 is not a stand alone agreement, as it only extends the activity period for which Swedish funds may be used, including allowing the use of exchange rate gains on previous instalments. Regarding donor funding end date, please remove the asterisk. We have not received any application for more funds, nor have we been approached in other ways. Therefore the expectations from UNIAP seems unfounded, unless they refer to the above mentioned exchange rates gains, which has already been solved.</p>	<p>[Information in draft report had been provided and verified by UNIAP.]</p>
<p>5</p>	<p>para.175: The wording in para. 175 “It was quite typical of donors...” This is not an appropriate way to articulate this, and reflects badly on all donors, which is not acceptable to Sweden. Footnote 75 – Sida’s contribution for 2009-2011 is entirely based on the project proposal received from UNIAP for the period 2007-2011. UNDP were not forced to sign the agreement. If it went beyond the project period, they should have reacted but they did sign without any comments. Therefore, the responsibility should be placed on the bad internal control within the UN, and not on the donors.</p>	<p>Amendment.</p>
<p>MTV Exit - 6/3/12</p>		
<p>6</p>	<p>Thank you again for giving MTV EXIT the opportunity to send you more examples of the ways that MTV EXIT programming has benefitted from continued collaboration with UNIAP. I apologize for not sending this to you earlier and hope that there is still time for this anecdotal information to inform your report.</p> <p>UNIAP's Role with COMMIT: MTV EXIT was able to establish a contact with the Chinese representatives to the Coordinated Mekong Ministerial Initiative Against Trafficking (COMMIT). These representatives are Anti-Trafficking officials from the Ministry of Public Security (MPS). MTV EXIT’s</p>	<p>No amendment. Covered in para 100.</p>

	<p>current aim in China is to produce a documentary about human trafficking in China for a Chinese audience to be broadcast on MTV China and CCTV. Through this relationship with Chen Shiqu, PhD, Head of the Office of Combating Against Human Trafficking Criminal Investigation Department within MPS, MTV EXIT has managed to establish a partnership that allowed for permission to be granted for an MTV EXIT film crew to film within China. Interviews with key links in the trafficking chain in China included, but were not limited to, ATIP Police Officers and an imprisoned trafficker. This program will be completed in 2012 and subsequently launched. In addition to broadcast, it will be distributed on DVD to Government ministries and anti-trafficking organisations for their continued use in outreach and education. This program has the potential to reach 700million viewers when broadcast on CCTV and all became possible due to UNIAP's facilitation of the introduction of MTV EXIT to China's MPS. In March 2012, MTV EXIT will hold a press event to launch a documentary program in Yangon which will convene representatives from the Myanmar, US and Australian Governments. The documentary program features locally-specific content filmed in Myanmar as a result of the support of the Ministry of Home Affairs (MOHA) of the Myanmar Government. This process has not been easy for MTV EXIT and would not have been possible without the on-going support of UNIAP in Myanmar and their strong relationship with MOHA and the ATIP Police. UNIAP staff not only facilitated the introduction of MTV EXIT and key members of MOHA but UNIAP Myanmar staff have also served as on-going liaisons between MTV EXIT staff and the Myanmar government officials which was vital to MTV EXIT's successful production of this program due to constraints associated with being a US-government funded project.</p>	
7	<p>UNIAP's Research: MTV EXIT is an educational campaign that aims to relay the most relevant and up to date information on trafficking trends and available resources to its target audiences in markets across the region. Because MTV EXIT does not have the in-house capacity to do in-depth research on trafficking trends, MTV EXIT relies on the research reports produced by partner agencies. Due to the fact that UNIAP consistently</p>	<p>No amendment Covered in para. 87 and 88.</p>

	publishes trustworthy and insightful reports on trafficking in the GMS and UNIAP's staff in all countries of operation are amazing sources of information as well, MTV EXIT utilizes UNIAP research resources regularly.	
8	UNIAP as a convener of stakeholders: MTV EXIT strives to run campaign activities that are complementary to on-going on-the-ground efforts to combat trafficking in each of its markets. As the agency that regularly convenes all ATIP stakeholders at the regional and national level, UNIAP has continued to show its support of MTV EXIT's activities by convening stakeholder's meetings and through introductions to key ATIP leadership (both in the government and non-government sectors) on MTV EXIT's behalf. This has made it much easier for MTV EXIT staff to utilize time on the ground to meet as many relevant parties as possible.	Amendment. Para. 97
9	UNIAP Hotlines: MTV EXIT uses all of its media platforms to not only address levels of knowledge and attitudes regarding human trafficking, but also to relay to audiences what they can do to protect themselves and their loved ones, learn more, and report a crime. A major component of MTV EXIT's direct messaging is relaying hotline numbers for concerned individuals to call. MTV EXIT promotes national government hotlines when they are available, but often has to also promote non-government hotlines when the government hotlines do not have the full capacity to field all calls. For example, in MTV EXIT's new documentary for Thailand, MTV EXIT promoted the National Thai hotline but because its operators do not have Burmese or Cambodian language capabilities, MTV EXIT also promoted two UNIAP numbers. Also, in pre-surveys that MTV EXIT has done in key markets, MTV EXIT has asked as a follow up question to whether or not someone would report a suspected case of exploitation or call for help, whether they would be more likely to call a police/ government hotline or an NGO hotline and have found that populations tend to be split quite evenly which is another reason that MTV EXIT tends to promote both government and non-government numbers during its programs. MTV EXIT - UNIAP Success story: On 6 December, Khun Joy (at UNIAP) received a call on her mobile hotline from a 20-year-old Cambodian fisherman who was currently in Ambon, Indonesia. He and his 3 friends had been trafficked	Amendment. Para. 101

onto a Thai fishing boat 5 years prior, suffering beatings by pipe and all kinds of other implements when they did not work fast enough, and being provided very little food with very long, hard working hours. When his boat docked in Ambon for registration/supplies/etc, the crew was allowed to get off the boat just in the immediate vicinity of the pier, and he got to watching a music TV channel that was showing a documentary on – amazingly – a Cambodian man who had been trafficked onto a Thai fishing boat. At the end, he saw the different hotline numbers and called the UNIAP one (he speaks Thai after so many years on a Thai boat), which was Khun Joy’s number. Through the mobile hotline, Joy guided him and his friends on how to escape from the boat (police would not respond to assist) and surrender to immigration. UNIAP then hooked in the Cambodian Embassy and IOM to get things going on their repatriation, with UNIAP funding support. Since Joy was in touch with him (thanks to MTV EXIT’s documentary) while he was still in the slavery situation, he was able to collect details such as boat name and number, owner name, and so on. As a result of this one phone call, ten Cambodian men in total were repatriated to Cambodia and cases are being built against the exploiters. This case also illustrates the unique position that UNIAP is in as a regional project to complement regional projects like MTV EXIT. The fact that this Cambodian man saw the Thai documentary while in Indonesia illustrates that broadcast programming reaches far and wide and it becomes even more important to ensure that the resources being promoted in those programs (e.g. Hotlines) have the capacity to assist with regional cases such as this one. As aforementioned, these are just a few highlights of the ways that UNIAP’s efforts have resulted in positive achievements for MTV EXIT and I have no doubt that their programs have greatly supported other ATIP agencies in the region. UNIAP is a model that should not only continue in this region but should be expanded, and replicated in other key regions in the world. MTV EXIT would certainly benefit from having UNIAP in all of the markets that it works in! Thanks again for your inclusion of our experience in your report. We appreciate the opportunity to share just a few of the ways that MTV EXIT

	has benefited from its strong partnership with UNIAP.	
	UNIAP RMO - 7/3/12	
10	Below are UNIAP's responses to the evaluation report. Since much of the evaluation is based on an analysis of stakeholder perceptions, the responses below seek to clarify the statements that UNIAP considers unclear, unsubstantiated, unbalanced or untrue. As a general statement, UNIAP does not feel that the evaluation addresses UNIAP's overall "performance". Despite the fact that the TOR for this evaluation does state a required assessment of concrete results achieved against objectives, the evaluation report does not include analysis of UNIAP's achievements, impacts and outcomes. It places much of its emphasis on stakeholder perceptions. Significant concrete evidence of UNIAP's outcomes and signs of impact were shared with the evaluator but the report appears to have ignored much of this evidence. There also appears to be nearly a three to one ratio of negative quotes to positive quotes (statements made by the stakeholders). UNIAP questions whether this is an appropriate proportion given high marks in Impact, Relevance, and COMMIT programming.	<p>No amendment.</p> <ol style="list-style-type: none"> 1. Assessment of UNIAP's performance is based on original data gathered from meetings involving 187 individuals; review of 178 documents; Email Q+A with UNIAP; historical analysis; review of UNDP internal communications. As a consequence it is not only based on 'stakeholder perceptions', though of course perceptions are important in a service-oriented project. 2. Where evidence from original data leans towards a negative finding on UNIAP's performance, the report ensures that UNIAP's own data is included e.g. Objective 2 Box 3 and para. 67 include UNIAP's lists of outputs and analysis of its own performance. 3. The balance of quotes is not apportioned according to a set ratio but the weight of evidence on a given issue. If anything, the bias is in favour of ensuring that all positive points about UNIAP are included when it comes to contentious aspects e.g. material relating to objective 2 was analysed twice to ensure that each and every positive point was included. It is should also be noted that quotes are not the only evidence provided in the report. 4. With respect to the three areas mentioned: the evaluation arrives at a positive conclusion with respect to the project's work on COMMIT; it is clear that a full determination of impact is not made; and relevance is an assessment of whether the project components set up in the design of Phase III are still relevant to the needs of the context. 5. All criteria are assessed in the same way; the difference in findings on various aspects is not due to differences in methodological approaches.
11	Paragraph 3: Objective One: Statement <i>"the project is not supporting all governments in the equal and unified way needed to best foster regional cooperation."</i> All governments are supported in an equal way - however the success of this support depends on how the governments respond to offers of support and may result in different support provided. UNIAP	<p>No amendment.</p> <p>Addressed in para 54, 91. 146-152, 107</p>

	believes this statement should be qualified with factual information, without which it could lead to critical misunderstanding.	
12	Paragraph 3: Objective Two: In highlighting reasons why UNIAP is not effective in coordinating UN partners, it is later stated that this is probably not possible without the authority to do so. It would add balance to also include this statement here.	No amendment. This is misleading, the actual sentence says “UNIAP as a small project lacks the authority to compel others to coordinate, especially if they are unwilling to be coordinated, and even more so if it is unwilling to coordinate its own work with others”.
13	Paragraph 3: Objective Three: What are the criteria for identifying full or partial compliance? Is it based on the number and type of activities or exclusively on stakeholder perceptions? The criteria are unclear.	No amendment. Degree to which the project fulfils the objective based on a range of evidence.
14	The paragraph at the end of Objective 4 is a concluding statement, which should be highlighted.	No amendment. Only headings are highlighted here, not statements.
15	Paragraph 3: Impact: Statement “ <i>There is considerable anecdotal evidence of the project’s impact but it is beyond the scope of this evaluation report to make a full determination on impact.</i> ” While this is a very important statement, there is little attention paid to impact in the executive summary or in the body of the paper. Conversely, there are many quotes focusing on UNIAP’s limitations and relatively few identifying the project’s strengths.	No amendment. 1. This statement is in the executive summary. 2. It does not merit further attention, the evaluation makes it clear that it could not make a full determination of impact and could only gather anecdotal examples. Nor was any impact assessment available from UNIAP.
16	Paragraph 3: Relevance: Statement “ <i>The project is highly relevant. The COMMIT process and support to Government action remains the top priority. The research work fills critical gaps in knowledge.</i> ” Once again, this is a very important statement, but there is little attention paid to this topic either in the executive summary or in the body of the paper. As a general trend throughout the document, there are many quotes focusing on UNIAP’s limitations, but there are considerably less identifying the project’s strengths.	No amendment. Relevance is due to the context and external needs and reflects a recognition of the need for inter-governmental cooperation and research.
17	Paragraph 3: Efficiency: Statement. “ <i>The project’s management and governance structures are dysfunctional, unable to provide the adequate control and guidance needed to keep the project on track, and in dire need of reform.</i> ” It is a very strong statement to say that the project is off-track. This statement has the potential to misrepresent the overall management of the project and lead to confusion. While there has been limited oversight by the UNRC/Principal Project Representative (PPR) in terms of	No amendment. 1. The project is not under the full administrative control of UNDP operations according to UNDP’s own review of its role in the implementation of UNIAP in June 2011. Other internal UNDP documents also suggest it operates in an independent way. 2. The project does not always appear to have adhered to UN standards e.g. research para. 91-94.

	<p>programming and some overlapping governance structures, UNIAP would contend that the project is on track and its day-to-day management was not dysfunctional. While the text goes on to describe how there was limited line-agency oversight, the project has consistently been under full administrative guidance and control of UNDP operations. The project adheres to UNDP rules and regulations and is managed according to the highest UN standard. This is lost in this statement and could result in serious misunderstandings among those who choose to only read the Executive Summary. The project also adheres to annual workplans, which are tied to the Project Document and COMMIT SPAs. Since 70-75% of UNIAP's work is COMMIT, and COMMIT work is clearly defined by the SPAs and planned in the annual workplans, this evidence in itself seems to contradict the general statement that the project is off-track.</p>	<p>3. The way in which the project is off track is discussed in detail in chapter 3, section 1. The evaluation does not agree that 70-75% of UNIAP's work is COMMIT in the way it is currently executed. See section 1.5.2.</p>
<p>18</p>	<p>Paragraph 4: Statement <i>“The core priority on COMMIT, in terms of 70% focus of the project’s time and resources, has not been fully maintained due to a growing emphasis on objectives 3 and 4.”</i> This percentage is not actually stated in the Project Document, but UNIAP has used the PMB approved budget structure developed in 2007 (by the project) as an operational guide. While there has been an increase in Objectives 3 and 4 in recent years, this increase has not been significant enough to conclude that the project is “not on track.” On the contrary, one might argue that the project has been effective in raising funds to address emerging issues such as in the “case of global financial crisis” and support to migrants trapped in other countries. UNIAP provided the evaluator with evidence that financial inputs into COMMIT have followed the 70:30 guideline over time. UNIAP also provided the evaluator with evidence that substantially more than 70% of the time of most UNIAP country project officers is devoted to COMMIT, and approximately 70% of the time of most UNIAP regional officers is devoted to COMMIT. (An exception would include information officers, whose job is to oversee information services, but it should not be considered negative that they spend more time on information services than COMMIT programming.) No concrete evidence to the contrary was presented in the evaluation report, though a judgment</p>	<p>No amendment.</p> <ol style="list-style-type: none"> 1. 70:30 is an agreed principle. COMMIT governments as a whole expect UNIAP to maintain this breakdown. 2. The project made assertions that it keeps to this ratio. However, the only supporting evidence is the financial information which is already included in the report. Moreover, other analysis carried out by the evaluation suggests differently.

	seems to have been made. On what basis? Please present evidence.	
19	Paragraph 7: Statement: <i>“All project strategies need to pull together to serve the key purpose which is to combat human trafficking through improved inter-governmental collaboration.”</i> This is not UNIAP’s key purpose as set out in the Project Document, nor would it meet Objectives 3 and 4 if carried out in isolation, which is why UNIAP seeks to support COMMIT in the longer term through implementation of other objectives.	No amendment. According to the project document, <i>“the core purpose of UNIAP during Phase III will be to ensure that COMMIT can move forward and realize its full potential”</i> . COMMIT is an inter-governmental process and therefore its key purpose.
20	Paragraph 8: Statement: <i>“The issue is that it has not really done what it was supposed to do in the way it was supposed to do it. Given that the approach laid out in the project document had been endorsed by various constituencies in 2006 as important for a systemic counter-trafficking response, UNIAP was not free to go down a somewhat different route without securing the agreement of all concerned.”</i> The Project Document is broad and serves many different stakeholders; the special projects (pilots) and the research and development roles were also highlighted as functions of the project.	No amendment. Other project functions are subordinate to the main project purpose cited in comment 17 above.
21	Paragraph 9: Statement: <i>“Naturally UNIAP project management must also share responsibility for the strategic choices made of its own volition and without due consultation with other players or requests for authorization from a higher level.”</i> Please refer to the TOR of the Regional Project Manager (RPM) for a more thorough understanding of what decisions are under his responsibility versus that of the UNRC/PPR or PMB. UNIAP made decisions based on its assessment of the needs in the sector and the RPM consulted and provided regular briefings to the UNRC/PPR. UNIAP also consulted and reported on its work regularly to donors and partners in a variety of different forums (e.g. Project Steering Committee Meetings, interagency meetings, etc). All of UNIAP’s proposals have to be (and were) reviewed by UNDP before they could be signed off. Furthermore, UNIAP tried to include more detailed briefings on its work in the PMB meetings but this was not accepted by the chairperson (UNRC/PPR).	Amendment to reinforce the point made by the evaluation. 1. While the evaluation recognizes the responsibility of higher level management, it does not abnegate UNIAP RPM from responsibility to its superiors and stakeholders. See para. 184. See also para.93. The statements made by UNIAP about the relationship with the UN RC are one side of the story; UNDP internal records suggest there were other angles also which must be borne in mind when arriving at an overall conclusion.
22	Paragraph 10: Statement: <i>“Recurring problems over concurrent phases and recommendations for resolving them in various management reviews and evaluations have not been taken up.”</i> UNIAP did immediately follow up on	No amendment. 1. The statement does not refer to UNIAP alone but also its management and governance structures.

	<p>the evaluation recommendations; this despite the fact that UNIAP was told on many occasions, including by UN voices in the PMB meetings, that the 2009 evaluation was invalid and should not be used as a reference. Documentation of UNIAP’s compliance with the mid-term report recommendations was presented to the evaluator and the resultant tracking matrix is even referred to in the evaluation report. Please clarify which recommendations were taken up and which were not. While the 2009 mid-term evaluation addressed many important issues, it was discounted by the UNRC/PPR and other UN agencies as “biased” because one of the consultants who conducted the evaluation had previously received fees for ten days of work from UNIAP (as was acknowledged by the consultant). The UNRC/PPR asked UNIAP to present an update of the recommendations at a PMB meeting in 2010, despite having insisted that the mid-term evaluation was “null and void.” There are other references to the 2009 mid-term evaluation which were not addressed because UNIAP was instructed to ignore them (paragraphs 83, 91, 105, 152, 155, 157, 163, 207, 217, etc).</p>	<p>2. Internal UNDP documents suggest the contrary; that UNIAP was asked to follow-up on the mid-term evaluation but was slow in doing so. There is no documentary evidence to show it was instructed to disregard the recommendations listed by UNIAP under comment 20. 3. There would appear to be no reason why UNIAP could not follow-up on programmatic recommendations. Those who were criticizing the mid-term evaluation for being too ‘biased’ and ‘soft’ on UNIAP, would unlikely have objected to UNIAP addressing the critiques made in that report.</p>
<p>23</p>	<p>Paragraph 32: Statement: <i>“When asked why they did not raise their concerns more openly, one interviewee said, “We’ve seen what happens to other organizations, we try and be tactful and don’t reveal differences...”</i>. UNIAP considers that this statement is inappropriate for a report like this. While UNIAP staff feel much the same way about their interactions with some of development partners, it is “human nature” to be concerned about the reactions of people from different organisations. Reported in this way, it offers an unfair impression that is not balanced in the context of this evaluation.</p>	<p>No amendment. 1. It is very uncommon in a development evaluation to find sentiments of this sort and the type of conduct described in para. 173. The project is wrong to put this down to ‘human nature’ and should be seriously concerned by the atmosphere of distrust that appears to have evolved around this project. 2. The point raised about UNIAP staff feeling uncomfortable about their interactions with development partners (albeit in a different way) is acknowledged in various places in the report e.g. para. 187.</p>
<p>24</p>	<p>Table 1: Page 16: While the report repeatedly talks about the importance of the Government partner (41 interviews) and how the emphasis should be on inter-governmental support, it seemed to place more emphasis on the UN partners (44) and NGO (45) partners who represented nearly half the interviews. In the case of UN interviews, more of them were done on a one-on-one basis.</p>	<p>No amendment. UNIAP selected the interviewees and made the arrangements for interview. The evaluator only identified 3 interviewees out of 187 and the only instruction given to country offices in setting up meetings was that meetings should be arranged on an individual basis as far as possible, but that given time constraints, group meetings could be organized for NGOs.</p>

25	<p>Paragraph 39: Statement: <i>“The EMG comprises of two members of the UN Evaluation Development Group for Asia and the Pacific; a sector specialist from UNODC; and the chief of the UNRC’s office (as chair of the EMG).”</i> From the beginning of the process, UNIAP considered that the UNODC person was neither neutral nor unbiased. UNIAP and others considered it a conflict of interest as defined by the United Nations Evaluation Group Standards for Evaluation in the UN System to have this person participate in the EMG since he had been an outspoken critic of UNIAP in several settings and, lacks the skills or background appropriate for evaluation management (see Standard 2.1 Points 3-5). This concern was stated to the UNRC and others on several occasions. The fact that the Thai government stated that the COMMIT Secretariat “could be transferred to UNODC so that UNODC could build COMMIT into its Global Plan” (page 59) further supports concerns of a conflict of interest. No reference to this conflict of interest was noted throughout the evaluation process nor in the report.</p>	<p>No amendment.</p> <ol style="list-style-type: none"> 1. The report directly addresses conflict of interest in para. 3 – it discusses the structure of the EMG, the process for approving the EMG which involved consulting PMB/COMMIT, the participants in EMG which include both evaluation and sector specialists (role played by the person mentioned in the comment), and efforts made to mitigate against potential bias in para. 3. 2. The evaluation quotes the Thai government statement about UNODC in para. 170 and footnote 88. 3. It advises against UNODC as a potential home for the project in para. 39. 4. It is difficult to see therefore what the project is alleging here.
26	<p>Paragraph 44: Statement: <i>“This COMMIT agreement was accompanied by a Sub-regional Plan of Action (SPA I) and UNIAP was asked to function as its secretariat.”</i> This statement is misleading in its structure; UNIAP’s role as Secretariat was stated in the MOU that was signed in 2004 (Yangon). It did not come at a later time with the SPA I (since the SPA I was developed over a period of a year).</p>	<p>Amendment.</p>
27	<p>Paragraph 47: Statement: <i>“The principal donors supporting the major part of the project’s work are NZ, Norway, SIDA and AUSAID.”</i> The US Government is the fourth largest donor (GTIP and USAID) and should be included in this list.</p>	<p>Amendment.</p>
28	<p>Paragraph 49: Statement: <i>“The evaluation looks at overall progress made in relation to key objectives, and considers progress from a strategic level – it does not undertake a pedantic examination of compliance with lower level requirements. The report first considers effectiveness against the four main objectives set out in the project document and then comes back to various cross-cutting issues affecting all objectives.”</i> Evaluation of effectiveness appears to be based on the evaluator’s interpretation of compliance and</p>	<p>No amendment.</p> <ol style="list-style-type: none"> 1. The evaluation assesses all the factors listed: quantity (e.g. Box 3 and para. 67), quality (e.g. para. 87 and 88 or para. 111), range and scope (e.g. section 1.4, 1.5.3. - 1.5.6.), emerging needs e.g. para. 52. 2. See also response to comment 10 on sources of evidence.

	consistency with the Project Document. It does not address the following factors: the quantity or quality of the work, the range and scope of interventions, emerging needs in the context of the changing human trafficking situation and inter-agency landscape, etc. It appears to place great emphasis on subjective perceptions, without objectively addressing an assessment of programmatic progress or achievements.	
29	Paragraph 54: Statement: <i>“but concerns that the spirit of cooperation and unity between Governments at regional level has suffered in this phase due to various factors discussed under objective 3 and in the last section, ‘Cross-cutting issues – Project coherence.’</i> The COMMIT governments are sovereign states and have the right to take whatever position they wish on any matter of issues. If the six governments have consensus about some issues but not others, the lack of consensus is not necessarily a negative; more importantly, it is not a failure of the Secretariat – it is a choice of the governments.	No amendment. The way UNIAP as secretariat conducts itself has a role, particularly if the project itself becomes a subject of dispute e.g. para. 170-175.
30	Paragraph 58: Statement: <i>“Despite these efforts, a cross-section of stakeholders question whether UNIAP is able to monitor the COMMIT process effectively.”</i> The report repeats statements like this based on “expressed opinions.” Without providing a response based on concrete evidence as to whether the evaluator feels this statement is true or not, it leaves the reader wondering what to think. UNIAP would argue that the statement is not true. The project has many systems in place to monitor the COMMIT Process and provided the evaluator evidence of this at both the country and regional levels. What is the concrete evidence that COMMIT is not monitored effectively?	No amendment. This is an incorrect reading of the report. The report finds that UNIAP has put in place various mechanisms to monitor the process para. 170-175.
31	Paragraphs 62 and 63: Statement: <i>“UN and civil society said that participation seemed contingent on their agency making a contribution and that UNIAP was not transparent and didn’t share the minutes of task force meetings.”</i> It would seem appropriate to mention here that public disclosure of some COMMIT meeting minutes is the decision of the government, not the Secretariat.	Amendment. Para. 63 already acknowledges parameters being set by governments and not UNIAP and the additional point about minutes is inserted here.
32	Paragraph 64: Statement: <i>“However, stakeholders from different agencies comment that appropriate standards are not always followed and that</i>	Partial amendment. 1. These are two examples out of a number of examples from different

	<p><i>remedial action is not taken when these gaps are brought to UNIAP's attention. UNIAP activities such as presentations, special projects, or statements to government counterparts, for example, are said not to make adequate reference to the distinction between adult and child victims of trafficking as indicated in the UN Trafficking Protocol or in ethical standards for conducting research and/or interviewing child victims or children vulnerable to trafficking.</i>" Please provide evidence to support UNICEF's claim that UNIAP does not make adequate reference to the distinction between the definitions and needs of child versus adult trafficked persons. UNICEF raised these issues with UNIAP in two instances. First, the issue was raised by UNICEF in relation to the COMMIT region-wide reintegration survey. The reintegration survey's field manual covers all of these topics in great detail, as did the researcher training that followed from the field manual, and it was discovered through discussions with UNICEF (UNIAP attempting to remedy this situation) that UNICEF had not even reviewed these materials. The field manual can be found on our website if you seek concrete evidence. The second instance that UNICEF raised this issue with UNIAP was with regard to the COMMIT regional training programme, where they suggested that a full one out of five days of the curriculum be devoted to children's issues. UNIAP explained that if UNICEF felt this way, they should have raised the issue for decision in the inter-agency working group on training curriculum development, which they did not even attend. UNIAP suggests that the evaluator refer to concrete evidence. If UNICEF has similar concrete evidence, please present it. It is also worth noting that in order to emphasize more on children, UNIAP has tried to engage with UNICEF by inviting it to participate in many inter-agency activities and forums but they have rarely attended. On one occasion UNICEF sent UNIAP some child protection guidelines focusing on all aspects of child protection (i.e. not targeting human trafficking per se) and asked UNIAP to disseminate the information to its offices/partners, which was done.</p>	<p>organizations/sectors which reinforce the need for UNIAP to pay more attention to specialist advice.</p> <p>2. In the case of examples relating to children, the point was made by interviewees from more than one organisation, not only UNICEF. Wording is clarified accordingly.</p> <p>3. The comment by UNIAP is indicative of the kind of examples referred to in para. 71 of disagreements between UNIAP and others where there are conflicting accounts. The overriding point made in this para. is therefore based on feedback from different organizations and different thematic areas.</p>
33	<p>Paragraph 65: Statement: <i>"Feedback on this point included some criticism of the "unprofessionalism" of process management. Participants complain</i></p>	<p>Amendment. The comments relate to a range of stakeholders and not only</p>

	<p><i>about COMMIT/Project meeting documents being sent out too late, “meeting documents come two days before bamboozling us with information”. For Governments this can be particularly problematic where processes of internal consultation and decision-making are required to arrive at official positions. Interviewees also complain about insufficient notice when the project wants the participation of others e.g. in training sessions; or that minutes of meetings come too late and are inaccurate.” We have received feedback on this issue from one country out of six. How many countries expressed this sentiment to the evaluator? Please specify how representative this statement is. It is important to note that to get consensus from six very different governments on dates/times, the process is often delayed by just one or two countries. It is not uncommon for UNIAP to start planning months in advance but to meet obstacles and changes requested at the last minute. In addition, late or lack of responses or approvals (e.g. of previous meeting minutes) from countries or key partners contribute to the delays. The project is looking for ways to improve this.</i></p>	<p>governments. It is agreed though that most COMMIT governments did not make any remark on this point and the sentence should accordingly be modified.</p>
34	<p>Paragraph 71: Statement: Overall, it was a rare UN voice that said, “I like the project very much”. Was this a direct quote, as it seems to be presented?</p>	<p>No amendment. Yes.</p>
35	<p>Paragraph 73: Statement: <i>“UNIAP appears to have invested little budgetary resource in progressing this objective. It says that 1% of its budget was spent on objective 2 between 2006 and 2010. UNIAP receives unearmarked funding from at least two donors (see table 2) which ought to have given some freedom for diverting resources to this aspect.”</i> This point is misleading, as most interagency activities are self-funded by the individual organisations, so there are few costs associated with this objective. UNIAP has always ensured that as much funding as needed was spent for this initiative.</p>	<p>No amendment. UNIAP could have elected to support this objective with funding as it has done with other objectives.</p>
36	<p>Paragraph 76: Statement: <i>“UNIAP does not appear to have navigated this course well; it has taken on the role of go-between, passing messages from one side to the other, without establishing clear protocols. Moreover, functioning as an independent entity, UNIAP has its own interests (funding,</i></p>	<p>No amendment. 1. This discussion is about acting as a go-between between governments and agencies, it is not about being an intermediary between governments and governments.</p>

	<p><i>projects etc), and needs to be aware that it may be seen as pursuing its own objectives at the cost of other players through its liaison function and close relationship with Governments.”</i> UNIAP has been regularly asked by the governments to play this role in this manner. UNIAP would welcome suggestions for a better alternative for how to facilitate communication between six governments who use different languages. Furthermore, it seems unreasonable to single out UNIAP as seeking to pursue its own objectives as UNIAP is often asked to act on behalf of UN and civil society partners (which it does). Many examples have been provided to the evaluator of such instances.</p>	<p>2. UNIAP playing this role successfully in Laos is discussed in para. 68. 3. UNIAP playing this role with civil society is covered in para. 100.</p>
<p>37</p>	<p>Paragraph 79: Statement: <i>“On other occasions, UNIAP’s pressure for an immediate response to stranded victims, through local NGOs for example, was seen as devaluing established procedures and efforts to build the capacity of Governments to handle such cases themselves.”</i> UNIAP has coordinated and provided immediate support to stranded victims on a few occasions in order to learn from these cases and in turn, to use these cases to highlight and advocate for a wider understanding of human trafficking patterns. There are specific UN agencies that have the mandate to help these individuals, but there comes a point where the waiting period becomes unbearable for victims stranded in detention centers (it is noteworthy that allowing victims to languish in detention is contrary to international conventions). UNIAP only gets involved when official approaches have been exhausted and the victims and their families are becoming desperate. UNIAP provided several pieces of evidence to the evaluator that the project often supports limited repatriation costs because it is asked to do so by agencies mandated to support repatriations, such as IOM. In the same paragraph it is quoted that “UNIAP wanted to put money for repatriation through a local NGO, whereas capacity building is not sexy and takes time.” Is repatriation considered ‘sexy’? The inference that UNIAP is motivated to do ‘sexy’ things has a highly negative connotation. The merits of such quotes are not obvious. By including this quote, the evaluator gives it weight, and since it is a strong comment, it should be substantiated. UNIAP also provided the evaluator with several</p>	<p>Partial amendment. 1. It is agreed that the quote is inappropriate and should be removed. Nonetheless the underlying point questioning UNIAP’s approach is maintained. 2. The fact that UNIAP is approached by others and the activities it has undertaken to facilitate returns is reported in para. 79.</p>

	pieces of evidence on finances and programming that clearly indicate that the amount of funds that UNIAP spend on ‘unsexy’ capacity building vastly eclipses that which UNIAP has invested in ‘sexy’ repatriation costs. Would it not be fair in this section to counterbalance this organization’s perception with the reality of UNIAP’s programming emphases?	
38	Paragraph 82: Statement: <i>“It is sad to see that the very tense state of relations between stakeholders in Viet Nam is not situated in this broader context.”</i> UNIAP believes that the situation in Viet Nam was not just related to the One UN system. It is important to place this statement in a more balanced context, by explaining that the conditions UNIAP works in are not always supported by other agencies because of competing agendas. It is also worth noting that the country offices all operate in different environments. It is unreasonable to state that one is successful and another is not based on very different contexts and on the satisfaction of those UN partners.	No amendment. Para. 75 already discusses the issue of competing agendas between agencies. This para. is discussing another point about adherence to global UN policy.
39	Paragraph 84: Statement: <i>“UNIAP staff at different levels seem unaware of the wider issues discussed here and were often found taking misguided comfort in the notion that other agencies are “simply jealous of UNIAP’s success?”</i> It is important to know if this was the dominant sentiment, or if there was some awareness of the issues by UNIAP staff. And was there an effort by UNIAP staff to discuss issues beyond taking misguided comfort in this sentiment?	No amendment. No indication of awareness among UNIAP staff of some of the deeper underlying causes of tension discussed in the report.
40	Paragraph 88: Statement: <i>“It is worth noting that a minority of interviewees from different stakeholder groups, including research specialists, questioned UNIAP’s research methods e.g. generalizations based on inadequate sampling.”</i> UNIAP’s policy for every research initiative it carries out is to offer to meet with anyone interested to discuss and support its findings, and to discuss methodological approaches with those who have training in this area. While these invitations are offered, those to the former seldom accepted (those to the latter are accepted). Further elaboration on this statement would be useful to identify whether this applies to specific research and whether this statement is true. What is the evaluator’s determination, based on a review of UNIAP’s published	No amendment. 1. The parameters of the evaluation are set by its TOR: this is a strategic programme assessment not a quality check of individual research reports. The two require different methodological approaches. 2. The report already credits the quality of UNIAP’s research work given the majority view and pays substantial attention to that. However, the minority view from different stakeholder groups including COMMIT governments (plural), UN, NGOs, and research specialists, also merits some mention.

	<p>research methods? Regarding whether UNIAP makes generalizations based on inadequate sampling, please clarify, in which research studies? This comment is a serious challenge to UNIAP’s intellectual integrity; if it cannot be substantiated, it should not be included. From a review of the methods and limitations as detailed in every UNIAP research report, UNIAP would argue that this is untrue and in fact we are extremely careful about not overstating the representativeness of our research findings.</p>	
41	<p>Paragraph 92: Statement: <i>“Another related but separate issue is that reports to certain donors contain details about the issue of trafficking, especially cases investigated by UNIAP, which go beyond reporting on progress in the use of donor funds into issues of content and substantive findings e.g. circumstances and outcomes of cases (including identifiable details such as names of businesses), response of the authorities etc. The exact same information does not seem to be shared with other stakeholders i.e. concerned Governments or other donors (who receive a less detailed standardized report). Nor does this same information appear elsewhere in UNIAP’s publications; UNIAP’s website does not reveal identical data in terms of cases or timeframes for example, in UNIAP country datasheets, or in other sentinel surveillance or SIREN reports available publicly.”</i> This statement merits further explanation. Government and donors earmark funding for specific activities and donors’ reporting expectations differ. Information on cases is shared with relevant government and non-government partners depending on their reporting requirements on specific cases and a grounding of UNIAP’s work within a larger situational context. UNIAP would welcome one common reporting system for ALL donors if this was possible.</p>	<p>Amendment. The importance of this point is already explained in para. 93. However, greater elaboration is given in response to UNIAP’s request for “further explanation”.</p>
42	<p>Paragraph 95: Statement: <i>“There was also a complaint that ideas put forward by other stakeholders were rejected and then appear in a reformulated way under UNIAP’s own research.”</i> This is a strong accusation. As with Paragraph 88, please show the evidence. If the statement cannot be substantiated, it should not be included. UNIAP cannot identify any examples where it rejected an agency’s idea for a SIREN report, and then reformulated and published the report as authored</p>	<p>Partial amendment. 1. This statement will be clarified to show that the issue was about project stakeholders not ‘partners’ per se. The section is not referring to those UNIAP sub-contracts to carry out its research work - consultants, research institutes, local NGOs etc. 2. The point about the ideas of others appearing in UNIAP’s research is deleted as the evaluation was unable to solicit further details.</p>

	<p>by UNIAP. Of the 16 SIREN reports that have been published, 5 were solely authored by UNIAP, the remaining 11 by other partners or groups of partners. Which of these 5 reformulated an idea from a partner? The 5 UNIAP-authored SIREN reports are: GMS-01 Intro to SIREN; GMS-02 Vulnerability Targeting Research Methodology, a sharing of a research methodological approach; GMS-03 Trafficking Estimates Competition, based on UNIAP’s trafficking estimates initiative; CB-03 Exploitation of Cambodian Men at Sea, based on case analysis done by UNIAP; and CB-04 Exodus into the Sex Trade, based on UNIAP’s own research and statistical modeling. Please specify which of these were supposedly ideas and analyses taken from other agencies, and provide evidence of this. UNIAP regularly reaches out to partners through webmail blasts of SIREN reports as well as in inter-agency meetings, to ask for collaboration on research initiatives. This is why the majority of SIREN reports are actually drafted by partners, a fact that is obvious but misrepresented in the evaluation report. All SIREN reports must meet a particular standard. There have been occasions where submissions that do not initially meet this standard are sent back with feedback and suggestions on how to improve them, which partners do – they have never been reformulated and published by UNIAP.</p>	<p>3. UNIAP appears from its final sentences to suggest the reports are the responsibility of its ‘partners’. All SIREN reports are issued under UNIAP’s name and there appear to be no disclaimers distancing UNIAP from the contents of these documents.</p>
<p>43</p>	<p>Paragraph 96: Statement <i>“UNIAP’s research methods involve working closely at the grassroots level, which may merge with hands on support to victims, raising questions about whether UNIAP is going too far into implementation.”</i> The Project Document does not state that UNIAP should refrain from doing this, and instead indicates that it should. Almost any primary research in the field of human trafficking will “work closely at the grassroots” by virtue of the fact that anti-trafficking primary research involves data collection with trafficking-affected persons and communities. Is the argument here that UNIAP should not do primary research? If so, a substantiated argument should be made demonstrating that the benefits of UNIAP conducting primary research are outweighed by the costs of “going too far into implementation” – the costs of which are still unclear, as they are being argued by the evaluator.</p>	<p>No amendment. Already covered in 244 which discusses the types of parameters which need to be set in UNIAP’s research work.</p>
<p>44</p>	<p>Paragraph 97: Statement: <i>“There were calls from interviewees in different</i></p>	<p>No amendment.</p>

	<i>countries for more substance and joint action in these meetings, one interviewee said for example, “the working group meetings are boring, no action plans, just updates”, and another said the meetings were cordial “but they don’t get to the heart of the matter”. Coming straight after the contention that UNIAP research and work get too close to the heart of the matter, this is difficult to align.</i>	Doing hands on work on cases of trafficking is not the same as facilitating the counter-trafficking community to come together and work in a substantive way.
45	Paragraph 106: Statement: <i>“Some interviewees commented that UNIAP has not facilitated optimal resources allocation from donors to the wider community as it has been too concentrated on seeking funds for itself.”</i> UNIAP seeks funding to cover the cost of the project. UNIAP has a budget for each year and is expected to raise this money. The project has never been in a situation of surplus. In fact, there have been years when it has fallen short, creating considerable constraints. This refers to the core budget agreed to by the PMB and the donors.	Amendment. To also explain UNIAP’s position on this point.
46	Box 5, Key finding: Statement: <i>“Critics says it has gone too far into implementation and filled gaps that others are better placed to fill.”</i> In addition to quoting this statement from critics, it would help to clarify exactly where UNIAP is less effective in this objective and if others are better placed to fill them, why these gaps are not filled, in terms of effectiveness and results and not just in terms of perceptions.	No amendment. The box and the section that follows already explains the ways in which UNIAP has or has not been effective on this objective.
47	Paragraph 110: Statement <i>“UNIAP has identified relevant opportunities on the whole, albeit some reports about the duplication of existing activities e.g. hotlines or community micro-finance projects.”</i> Please note that UNIAP does not and has never managed any micro-finance projects, and manages only one hotline, a Burmese-language hotline in Thailand. Please identify the other Burmese-language anti-trafficking hotlines in Thailand that exist, to demonstrate that there is duplication. There are none.	No amendment. This refers across UNIAP’s programme.
48	Paragraph 110: Statement: <i>“A Government official in one country complained that UNIAP’s ethics training was overlapping with elements of training provided by others.”</i> UNIAP has shared many examples of partners praising the training as new and innovative (evaluation forms filled out at the end of the training). As such ethics trainings received favourable reviews and pre-post tests indicate a high level of learning and retention by	No amendment. 1. UNIAP’s surveys about its training are already mentioned in para. 51 and 57. The evaluator did not receive any specific pre and post test questionnaires related to the ethics training. 2. This is an important comment made by a COMMIT official who had attended various trainings including UNIAP’s training on ethics and

	<p>participants, would the evaluator argue that UNIAP should not do ethics trainings? Is UNIAP's ethics training overlapping with elements of training provided by others? What is the evidence of this? Has the evaluator sought to assess the validity of this statement?</p>	<p>found overlaps. 3. As discussed in para. 113 UNIAP might have taken a different approach to special project ideas of this type.</p>
49	<p>Paragraph 111: Statement: <i>“Some Government counterparts involved in these initiatives reported finding UNIAP staff more conducive to work with, as they took a more open, consultative approach which met their needs whereas other agencies sometimes came across as “too bossy”.</i> When this is weighed against other quotes in the report of UNIAP being too pushy, perhaps it would be better to assess these different perspectives, evaluate which have merit on the balance of the arguments, and then give a qualified evaluation. It is noteworthy that in the beginning of the report, the evaluator indicated that Government opinions are given more weight than some other constituencies given the prominence of COMMIT programming within UNIAP's mandate.</p>	<p>No amendment. 1. The only observation one could make is that UNIAP appears to conduct itself differently with different stakeholders, seemingly too pushy with some, more obliging with others. One doesn't cancel out the other. 2. The weight given to the opinions of governments depends on the objective in question; they cannot answer for objectives aimed at serving UN agencies or civil society.</p>
50	<p>Paragraph 116: The statement that under Phase II, UNIAP supported work by other UN partners and NGOs but that in Phase III <i>“it is not feasible to pass on funds to others due to multiple overheads and administrative barriers”</i> needs to be clarified/corrected. What kind of support is being referred to in Phase II that is not being provided in Phase III? Does UNIAP not fund NGOs and provide financial support to initiatives led by other UN, NGO, and inter-governmental programming and research, such as the Mekong Youth Forum (lead by ILO, SCUk, and WVI), and national-level research (for example, several research studies led by UNICEF and IOM)?</p>	<p>No amendment. 1. This is the reason given by UNIAP itself. 2. UNIAP has not provided any supporting evidence here to show its financial support to other agencies. The evaluation made further enquiries – there was no feedback to suggest any agency received funding from UNIAP, only confirmations of funding given to UNIAP and cost-sharing agreements.</p>
51	<p>Paragraphs 117 & 118: Statement: <i>“On the question of UNIAP's sub-grants to local NGOs, some interviewees questioned the choice of grantees and the transparency of the selection process.”</i> Additional information on small grants would be useful following the statement. Under UNDP rules, NGO's can be engaged in four different ways: as partners, as implementers, as recipients of grants and as contractors for professional services. UNDP has a comprehensive SOP for grant appraisal and approval, which UNIAP follows to the letter. However UNDP rules allow for a waiver of formal applications for small grants below \$2,500, which the project has complied</p>	<p>Amendment.</p>

	with. Please note that these small grants must also be vetted and signed by UNDP.	
52	<p>Paragraph 120: Statement: “A UNDP inter-office memorandum dated 13 December 2010 documents various concerns about UNIAP project budget planning and in particular persistent cost sharing deficits, the memo notes that feedback and guidance has been given to UNIAP on many occasions: <i>“But the issue seems to remain unchanged and it always ends up with the reversal of expenditure juggling funds from one donor to another...”</i> It is true that UNIAP has had cost sharing deficits. However it is worth noting that the major cause is that the project does not receive core funding or full-funding upfront. Each donor provides funding increments which means that funding levels rise and fall depending upon these schedules. Installments from donors come at different times. Each increment that is received is divided into seven portions (one for the regional office and the six country offices). When funding is low, even with proper budget planning, it is hard to know which office will need the money first or which one can wait for the next incremental funding. The project could take a simple approach to avoid deficits by lumping all of the funding into one account, rather than creating seven different sub-projects. But for the benefit of better tracking and monitoring of implementation, the project uses this more refined approach. The ATLAS financial programme is also not perfect and the system has problems with encumbrance accounting where at a given time, one expense can be recorded as commitment and actual expense at the same time. This temporarily causes double counting/overspent errors and issues a perceived deficit - but in these cases, the deficit is not real. Thus, some of these so-called deficits in UNIAP can be attributed to chronic system weaknesses faced by all those who use it.</p>	<p>No amendment.</p> <p>Internal UNDP records suggest UNDP had significant concerns about UNIAP’s project planning which were raised with UNIAP on multiple occasions by those who are fully familiar with UNDP administrative processes and felt UNIAP could handle things better.</p>
53	<p>Paragraph 121: Statement: <i>“Staffing, budget and activities are enmeshed in the delivery of project objectives i.e. instead of having staff specifically dedicated to working on particular objectives - staff assigned specifically for objective 1 COMMIT for example - a number of staff positions simultaneously work on all objectives. The budgets become conflated as</i></p>	<p>No amendment.</p> <p>The evaluation does not agree that UNIAP’s model is wholly effective (see pages 22 – 50), nor that it is necessarily cost-effective (para. 211-212).</p>

	<p><i>noted by UNDP administration and activities cross-refer.</i>” Few small projects have the flexibility to have staff assigned to only one objective. Since the non-COMMIT work only constitutes about 30% of UNIAP’s efforts, it would not be cost-effective. For example, it is not possible to say that the NPC will work only on Objective 1 and the Information Analyst will only work on objective 3. The country offices work as teams and their staff have to fill in when someone is absent. It is the NPC’s own management decision to assign particular staff members as focal points for each objective. As mentioned earlier, trying to divide staff functions and funding according to each objective would complicate financial management even further. Furthermore, most donors and stakeholders value effectiveness and cost-effectiveness. UNIAP achieves both effectiveness and cost-effectiveness through synergies between its COMMIT and non-COMMIT work. Please provide evidence supporting the argument that if UNIAP had separate staff for each Objective this would lead to greater effectiveness and cost-effectiveness. The only rationale provided here is that it would clarify budgets, which could alternatively be addressed through administrative reform that does not sacrifice effectiveness and cost-effectiveness.</p>	
54	<p>Paragraph 123: Statement <i>“It could be seen as limiting to establish priorities under objective 1 based on UNIAP’s experience alone rather than a full scan of the sector.”</i> Priorities under Objective 1 have never been based on UNIAP’s experience alone but rather on a range of inter-agency partners’ experiences and contributions.</p>	<p>No amendment. This is not supported by UNIAP’s approach described in para. 122 which places priority on ensuring that UNIAP’s own research and action at grassroots level feeds into policy.</p>
55	<p>Paragraph 124-125: Statement: <i>“The 70:30 principle was agreed in terms of the breakdown of the project’s time and resources between COMMIT and non-COMMIT activities. The project says this breakdown is maintained in financial terms e.g. 2006-2010 – 60% went on objective 1; 1% on objective 2; 11% on objective 3; 19% on objective 4.”</i> While it is not in the Project Document, the 70:30 principle was decided by UNIAP in consultation with the PMB. The Governments as primary stakeholders in COMMIT expressed that they were satisfied with this breakdown. In addition, the overall evaluation of Objective 1 finds UNIAP has been successful in this</p>	<p>No amendment. Point addressed under comment 18.</p>

	<p>objective, by governments and other stakeholders alike. It thus seems contradictory to suggest that UNIAP has been neglecting COMMIT. At the beginning of the year, the workplan is approved with the COMMIT budget of around \$100,000 and around \$30,000 for Non-COMMIT. For countries that receive additional funding for Objectives 3 or 4, their budgets might reach \$40,000 and \$50,000.</p>	
56	<p>Paragraph 126: Statement: <i>“The focus on COMMIT is also decreased when the project places greater emphasis on non-COMMIT objectives in the way it accounts for itself. This is important as it gives a signal as to UNIAP’s own priorities. There are numerous examples of this e.g. UNIAP’s own mid-phase review devotes 22 pages to objectives 2-4 but only 7 pages on COMMIT; and the project’s revised logframe 2009 has more outputs under non-COMMIT objectives as compared to COMMIT.”</i> In UNIAP’s opinion, this does not imply an increased emphasis on non-COMMIT objectives, as parallel to this report UNIAP produces a dedicated Annual Report on COMMIT and a major SPA report at the end of each SPA period. Both reports provide very comprehensive information about COMMIT. It should also be noted that the UN agencies are part of the UNIAP PMB. The argument that UNIAP has gone too far in implementing Objectives 3 and 4 has never been raised in a PMB or in any other official forum. As a second response to this statement, it could be said that a disproportionate amount of space is used in this evaluation report to discuss Objectives 2-4, while these objectives only account for about 30% of UNIAP’s work.</p>	<p>No amendment.</p> <ol style="list-style-type: none"> 1. The concern about UNIAP’s changing focus has been raised numerous times in the course of the evaluation by stakeholders. 2. The space devoted to discussing objectives 2-4 in this evaluation report can be accounted for in a number of ways: the prominence given by UNIAP itself to these objectives and the way its approach to these matters has led to conflict with others - this inevitably leads to many issues which need examining; the evaluation TOR required a focus on all objectives; all objectives need to be inspected in order to see if they should be retained. 3. UNIAP appears to agree with most of the evaluation recommendations, and in particular changes to the inter-agency nature of the project. The major changes proposed in this evaluation report cannot be justified without a thorough examination of each objective and a finding that the project does not function well at a number of levels. The recommendations for change go hand in hand with the negative findings.
57	<p>Paragraph 129: Statement: <i>“its role and responsibilities are not clear...it should be inter-agency...a coordinator not an implementer...it acts like an implementer”</i>. One described it as <i>“a coordination project which is not coordinating well.”</i> Another expressed concerns about the participation of UNIAP staff in raids said <i>“we feel uncomfortable, we don’t know what UNIAP is going to do next – we don’t know what vision there is for this phase, they just seem to jump on issues”</i>. Others queried the point of UNIAP participation and the risks involved for all concerned.” This paragraph demonstrates that the report is generous in listing negative</p>	<p>No amendment.</p> <ol style="list-style-type: none"> 1. These are comments from wider counter-trafficking stakeholders in three different countries and UNIAP should be concerned by this feedback. 2. It is agreed that they appear bunched together and one of the quotes has been moved elsewhere. 3. UNIAP’s comments about coordination being a two-way street may apply to UN agencies under objective 2 who have some authority in relation to UNIAP. They do not apply to NGOs who are not on an equal

	statements without weighing or evaluating these comments – compared with the otherwise noted observations that coordination is essentially a two-way street, and UNIAP does not have the authority to coordinate those who do not want to be.	footing with UNIAP and unable to express the kinds of concerns raised here as a matter of course. 4. As noted in response to comment 8 above, the weight of the material reflects the balance of responses.
58	Paragraph 130: Statement: <i>“In one location UNIAP staff reported monitoring around 50% of the caseload of NGO partners which involves re-assessing needs and making referrals – monitoring on such a scale is actually redoing the work of local partners – and the question must be asked if there are so many mistakes, why UNIAP is not focusing on partner capacity building rather than taking over the tasks itself.”</i> Support on casework also includes capacity building and supporting partners networking. UNIAP fails to see how NGO monitoring is “redoing their work”. Please substantiate this. There are a lot of improvements that need to be made in the area of ethical treatment of trafficking-affected persons; this work is very much capacity building and central to UNIAP’s function.	No amendment. This is self-explanatory.
59	Paragraph 135: Statement: <i>“Not everyone has a problem with UNIAP doing implementation, some, albeit a minority, say this leads to useful in-depth information about trafficking routes and the trafficking experience, and that it’s useful for UNIAP to learn the issues first hand. Some can’t see the harm in helping out victims in need e.g. airfares for repatriations, bicycles to help them find work etc. But others, including trafficking specialists refer to such activities as “charitable giving with little strategic value.”</i> Please identify where a bicycle was ever given directly by UNIAP to a victim; it has never happened. UNIAP has funded some shelters and NGOs to improve their services, and some of these may have included such purchases – but this is not UNIAP’s work or service provision, it is the work of the victim service agency. If this quote and this perception is based on a false understanding, UNIAP questions the merit of its inclusion, particularly without a balanced presentation of the reality.	Amendment.
60	Paragraph 138: Statement: <i>“However, other stakeholders see things differently and do not find UNIAP’s approach so facilitative or open to involving others. In terms of UN agencies, it does not appear to have fully respected specialised roles or given leadership over particular COMMIT</i>	No amendment. UNIAP does not provide any evidence here to support its claim. The evaluation made additional enquiries, and there was no confirmation of UNIAP approaching others over the course of Phase III to discuss and

	<p><i>areas. For instance, the project might have taken the approach early on of negotiating with each agency to take responsibility for leading on technical support for each stream of work under COMMIT and for ensuring that services were delivered (even if they did not deliver them all themselves)."</i> UNIAP has done exactly this – IOM used to be the lead on protection, with substantial inputs from World Vision; ARTIP on prosecution; and ILO on prevention. When those agencies have funds and appropriate staff, this works. When they shut down or lose staff or funds, it does not (as seen when ARTIP shut down, when ILO TICW project shut down, and when IOM lost key personnel). If these agencies had been able to do this work throughout Phase III, it would have been a great help to the counter trafficking community as a whole.</p>	<p>plan how technical assistance should be delivered, to find solutions, assign leads, discuss alternatives etc.</p>
<p>61</p>	<p>Paragraph 143: Statement: <i>"The scope of UNIAP is questioned when it seems to absorb more and more activities into the COMMIT process, and consequently its own remit. UNIAP started this process in 2008, "to incorporate UN non-COMMIT projects...(names of other agencies..) into COMMIT workplans and to have these activities 'count' as COMMIT" with the intention of trying to coordinate all activities under one roof."</i> This is a logical direction for those activities that were piloted or that have been included in a new SPA (SPA III). For example, AREA 5 of SPA III includes a full range of data collection and analysis of activities. When governments show an interest in doing research that was originally under Objective 3, it is a positive outcome to have it be considered part of COMMIT. This trend should be encouraged as it leads to more ownership and sustainability.</p>	<p>No amendment. The scope of COMMIT at regional level relates to the scope of its remit at national level as discussed in para. 144.</p>
<p>62</p>	<p>Paragraph 145: Statement: <i>"Somewhat related to this are complaints from various quarters about UNIAP over claiming results. The Thai Government says that activities taking place outside the scope of COMMIT are included in UNIAP reports and that minor support provided by UNIAP e.g. translations end up getting listed as a UNIAP activity. UN and NGOs raised similar concerns. One NGO said UNIAP took the credit for work involving several organizations."</i> This statement by the RTG was made in 2007. It refers to an isolated case that was resolved in that same year. It would be useful if the evaluator could list specific examples since this date.</p>	<p>No amendment. These concerns have been raised over the years and by different stakeholders.</p>

63	<p>Paragraph 146: Statement: <i>“This dualism comes out in various ways when UNIAP itself tries to overtly criticize Governments or when it is seen as coming between the relations of UN agencies/NGOs and Governments.”</i> When has UNIAP “overly criticized” any government? How many governments? The statement implies that it is multiple governments. Please substantiate with concrete examples.</p>	<p>Amendment. The point remains valid e.g. para. 91-94; 107 but the wording requires clarification.</p>
64	<p>Paragraph 150: Statement: <i>“The second strategy developed by UNIAP itself, is to combat trafficking through a human rights investigation and public advocacy approach.”</i> Outlined in the project document under Objective 3. (i.e. services to the anti-trafficking sector in general), it could easily be interpreted that the provision of information on a trans-national crime in which corruption is a primary influence, would involve raising the nexus between these issues.</p>	<p>No amendment. As noted under para 92 and 93 such strategies should be explicitly approved by PMB/COMMIT rather than being reliant on the project’s subjective interpretation of what the project document covers.</p>
65	<p>Paragraph 151: Statement: <i>“UNIAP’s involvement in implementation would appear to have worked to its disadvantage. Had it taken a more hands off approach and seen its role under objectives 2-4 as more supporting and developing the anti-trafficking sector, it could have enabled other organizations to directly take on this advocacy with Governments. But by becoming involved in all dimensions, it has detracted from the ability of other players to take on this role, while at the same time being unable to fulfill its own function to optimum effect.”</i> Please provide clear evidence of this conclusion, and that UNIAP’s involvement in implementation would appear to have worked to its disadvantage in terms of results achieved against objectives. UNIAP supports advocacy of others, and as otherwise highlighted in the evaluation can also use advocacy through more discreet channels.</p>	<p>No amendment. See para. 102, 128-135.</p>
66	<p>Paragraph 152: Statement: <i>“Questions arise as to the strategic choices made by the project in this phase. While it has delivered important results for Governments and donors alike on discreet aspects of the project, the overall purpose of strengthening COMMIT seems undermined. Evaluation interviews indicate that the vast majority of stakeholders still consider this to be the most important part of the project; if so, there is a critical need to bring COMMIT centre stage once again.”</i> COMMIT has been and will always</p>	<p>No amendment. Saying that all activities under objectives 3 and 4 have direct or indirect relevance to COMMIT means little since the same statement could apply to all activities by the counter-trafficking community as a whole.</p>

	be the centre stage for UNIAP. Nearly all of the activities in support of this project (COMMIT or Non-COMMIT) have direct or indirect relevance to the COMMIT Process. This point is missed in the evaluation. To understand activity choices, it is essential to understand the environment that the counter trafficking sector operates in. Some of these statements assume that particular skills are available that are not.	
67	Paragraph 153: Statement: <i>“There is considerable anecdotal evidence of the project’s impact. In response to questions of impact, interviewees frequently cited UNIAP’s role in the development of laws and policies, cross-border MOUs etc; capacity building of Government officials; raising the awareness and profile of the issue; and increasing the knowledge base on the prevalence and characteristics of trafficking.”</i> This is a very important statement. Some of the positive quotes in support of this statement would offer the report some needed balance. From a reading of the evaluation TOR, as well, it can be seen that impact is a major expected component of this report but evidence and discussion of this section seems very limited.	No amendment. 1. The report makes it clear this is only anecdotal evidence and not a proper determination of impact. All the information received on impact is cited here. 2. The report is generous in its interpretation of UNIAP’s performance wherever possible. Despite only having anecdotal information, and no impact analysis from UNIAP itself, it nonetheless credits UNIAP with some degree of impact but this should not be overstated.
68	Paragraph 160: Statement: <i>“Stakeholders of all types are concerned about sustainability. One NGO said the relationship between the Government and UNIAP, “needed to change in the next phase.... when the Government looks at UNIAP as a donor, it weakens Government. We realise that one day there won’t be UNIAP and we can’t do anything.”</i> The interviewee went on to urge UNIAP to consider, “how to delegate the role and responsibility to Government, with the aim of the Government hosting the COMMIT secretariat itself. UNIAP can’t be in each country”. Another stakeholder commenting on exit strategies said it was “commonsense that the ownership of the project should be in country themselves.” The topic of COMMIT sustainability has been discussed in at least four COMMIT meetings, including the last SOM/IMM. The governments themselves have a strong sense of ownership of the COMMIT Process, as was demonstrated in various statements and letters submitted by governments during discussions on the future of UNIAP (as COMMIT Secretariat) in 2011, though all of these perspectives do not seem to be reflected here in a	No amendment. As noted in the statement, a range of stakeholders, including governments, raised questions in evaluation meetings about the sustainability of the COMMIT process.

	balanced manner. The governments make the decisions and determine the direction of the process. This, in itself, is a great achievement and a form of sustainability in its own right.	
69	<p>Paragraph 161: Statement: <i>“Sustainability does not appear to be much considered in terms of other project components either. Under objective 3, the coordination activities undertaken by UNIAP and in particular stakeholder forums could potentially be sustainable by making links with other country level networks e.g. Government or UN, however, this has not yet been pursued. The research activities are carried out directly by the project, possibly with some support by sub-grantees but as the discussion under objective three noted, there are calls for the project to be more inclusive and to disseminate its methodologies so that others can learn and replicate.”</i> First, there are few things more sustainable than an increased understanding of a particular topic from research findings (or ‘increased knowledge base in the sector’). Even if Objective 3 were to be eliminated tomorrow, the outcome of this work has already added a new foundation of understanding to the anti-trafficking sector. This is a form of sustainability. Second, there are very few formally trained researchers within the UN and NGO community; the same can be said for available consultants that have experience in doing this kind of work. Third, all methodologies are disseminated through the reports. Fourth, UNIAP has conducted researcher training programmes in Lao PDR and Cambodia which disseminate and teach methodologies to government and non-government officers. It should be noted that research being conducted should be suited to the skill level of the researcher. Finally, there are numerous examples of national-level research initiatives led by UNICEF or IOM in the past which UNIAP provided support to – for example, CSEC surveys and research in northern Laos. There is clear evidence of this and the rationale for their omission here is unclear.</p>	<p>Partial amendment.</p> <ol style="list-style-type: none"> 1. The section will be partially amended to cover researcher training programmes. The other elements are an expression of UNIAP’s views and unsupported by evidence. 2. The CSEC study in Laos is an example that was mentioned in evaluation interviews but UNIAP Laos is an exception in terms of its relations with other agencies as discussed under objective 2. As noted in relation to comment 50, enquiries were made and no further examples have been forthcoming.
70	<p>Box 8: Relevance: Statement: <i>“The project is highly relevant. The COMMIT process and support to Governments action remains the top priority. The research work fills critical gaps in knowledge.”</i> This is a very important key finding, yet it gets less than a page of text in a 90 page report. It would be</p>	<p>No amendment.</p> <p>The relevance is not due to the project but the needs of the context – a recognition of the need for inter-governmental cooperation and data/knowledge to help tackle trafficking. This was the case before</p>

	appropriate and more useful if more balanced, detailed discussion and quotes can be put in the text to highlight key findings such as one regarding relevance.	UNIAP Phase III started and continues to be the case. As such, there isn't much more that can be made of this in terms of attributing credit to the project. Infact, as noted in para. 164, some stress the project is relevant in principle but not in practice.
71	Paragraph 183: Statement: <i>“Complaints from external parties about the conduct of the project mainly started to surface in 2009/2010, although there had been letters as far back as 2007. This caused the UNRC to become more involved but by then it was too late to assert control, resulting in something of an over-reaction in the announcement to end the project prematurely.”</i> UNIAP would argue that it was not too late for the RC to have asserted control. What reason is given to declare that it was too late?	No amendment. Internal UNDP documents suggest that the project had become used to autonomy and was difficult to bring under control.
72	Paragraph 191: Statement: <i>“The UNIAP Thai office finds itself caught up in disagreements between UNIAP Regional and the Thai authorities. It has seen two scalps claimed in this phase – the project is now on its third Thai national programme coordinator.”</i> The reference to “two scalps claimed” is considered politically incorrect and would be offensive to native Americans and likely many others. UNIAP would recommend rephrasing this statement. Further, the position is national project coordinator, not national programme coordinator.	No amendment. 1. This is an extraordinary suggestion that the evaluation report is offensive to native Americans because it somehow alludes to the dated practice of ‘scalping’; an activity associated with frontier warfare in North America and involving the removal of the scalp of a dead or living person. This is a very subjective interpretation by UNIAP. This phrase has now come to be a common idiom in the English language used in all manner of day to day situations. 2. The title of the NPC is corrected.
73	Paragraph 193: Statement: <i>“The issue of nationality also comes up in relation to regional posts; with questions over whether it would be better to have people from the region, and non-Americans to be blunt, in key positions. Nationality should not be an issue for any post as UN standards lay out the responsibilities of staff to be independent from Governments”.</i> If, in fact, nationality should not be an issue, why raise this discriminating statement in the report? Is there something about two of UNIAP’s managers being American that makes them unqualified? UNIAP feels this statement is inappropriate for a UN evaluation of this type. Or, if such discrimination is included, it should be situated within a statement noting that the point of including this statement is to highlight the discrimination that UNIAP’s staff have been put through.	Amendment. UNIAP staff themselves reported that some stakeholders see this as an issue. The point is now elaborated in response to UNIAP’s call for justification.

74	<p>Paragraph 196: Statement: <i>“One issue raised as far back as 2007 and which continues till today, is the lack of internal coordination within the project, the absence of a proper hierarchy and protocols for seeking clearances and copying the regional project manager on external correspondences”</i>. Saying that UNIAP “lacks internal coordination” is an overstatement. UNIAP has internal coordination systems in place for most communication (communicating with donors, the UNRC, UN agency directors, NPCs, etc) – but not all. If issues arise, the approaches are refined and improved. Based on the results of this evaluation, additional modifications will be made. This is the standard process that management follows in any situation. The pre-requisition process is also a clear process where the Regional Project Manager clears an activity after technical and financial review by the CTA and finance/admin specialist.</p>	<p>No amendment. Good that modifications will be made as a result of this evaluation.</p>
75	<p>Paragraph 197: Statement: <i>“The present uncertainty over the project future and difficult relations with stakeholders has put staff under personal stress especially with the accompanying disruptions to contractual status. The vagaries of the UNDP administrative rules means that key regional staff have seen their incomes decline. Such job insecurity is unfortunately all too common in the UN system and in this context has been considerably exacerbated by continuing question marks over the life of the project itself. In terms of national staff, some have existed on staff service contracts for 10 years with no increases, steps, medical cover, pension or fixed term opportunities.”</i> It should be noted that under UNIAP, national project staff are engaged under Service contracts, which is the normal modality for UNDP project staff. It is true that it does not provide fixed term opportunity, but it does provide medical cover, pension and increments. However, these provisions are totally different from that of fixed term contracts. Key regional staff have also been subject to no increases, steps, and losses of benefits.</p>	<p>Amendment. 1. National staff – RMO information is not exactly the same as issues stressed in some country level meetings. As the evaluation is unable to check again, the report is modified to make the point more specific rather than eliminating it altogether. 2. International staff – amended.</p>
76	<p>Paragraph 202: Statement: <i>“In terms of the actual project document of 2006, UNIAP describes it as “vague” and finds room for maneuver in what the project is supposed to be about. UNIAP also says it received ambiguous verbal messages from the board on what the project should be about, that</i></p>	<p>No amendment. 1. These issues came up in various interviews, including with UNIAP. 2. The project’s claim that the document is ‘vague’ is different to what the report says...”while the document is imprecise and repetitive in</p>

	<p><i>they wanted UNIAP to do ‘implementation’ and ‘work on all 4 objectives’. UNIAP says these factors justify its interpretation of the project strategy in this phase. This view is counteracted by other evaluation interviews which suggest that stakeholders did try to steer the project back to the direction provided by the project document but that the team was unwilling to listen.”</i> This comment indicates that the evaluator feels that the Project Document is concise and not open to interpretation, yet there are interpretations made, for example the 70:30 split on COMMIT – which is not in the Project Document – amongst others. To describe the team as finding room to maneuver to change the focus of the project has strongly negative connotations. Please provide evidence that stakeholders tried to steer the project in a particular direction but the UNIAP team was unwilling to listen. Such evidence does not appear in any PMB or PSC meeting minutes; what is the evidence? One would assume such major issues would have been raised in one of these two venues. Also, in the following paragraph the evaluator also refers to the project document as ‘imprecise’ – is this very different from ‘vague’?</p>	<p>places, it is plain in its key ideas...” 3. If interpretations are made and agreed by PMB/COMMIT, this is not an issue e.g. 70:30 breakdown.</p>
77	<p>Paragraph 203: Statement: <i>“It has a policy/coordination function as opposed to an implementation function; and it is about service to other actors in the counter-trafficking community.”</i> The term ‘opposed to’ is not in the project document, and UNIAP does not agree that one should take it as read that one cancels out the other. The activities being interpreted as ‘implementation’ here are also in service to other actors in the counter-trafficking community.</p>	<p>No amendment. The project document defines implementation in a narrow way e.g. para. 128</p>
78	<p>Paragraph 204: Statement: <i>“The project document emphasizes the goal of the project to make an impact on trafficking through the “advancement of a more cohesive, strategic and incisive response” through various approaches aimed at convening and bringing players together, cooperation, coordination, cooperation, facilitation and services to the sector.”</i> The evaluation report repeatedly indicates that UNIAP is not in line with the Project Document. While this statement ummarizes the goal, it doesn’t completely capture the essence of the statement made in the</p>	<p>No amendment. The project ought to have tested the scope of the project document by ensuring all project proposals for projects under objectives 3 and 4 were put before PMB/COMMIT for scrutiny rather than assuming an interpretation itself e.g. paras. 92 and 93.</p>

	<p>Project Document related to the project activities. The actual Goal text is below:</p> <p>“Goal: This Project aims to make a tangible and sustained impact on human trafficking in the Great Mekong Sub-region (GMS) through continued advancement of a more cohesive, strategic and incisive response. To achieve this goal, UNIAP will: a. capitalize on its previous success in bringing together governments, UN agencies, and other development partners, notably through the COMMIT Process; b. build on and enhance other existing achievements of the anti-trafficking sector; c. further improve cooperation within and between countries and partners; d. improve targeting of resources and expertise; and e. promote dissemination and application of the latest in good practices and lessons from throughout the world. These activities will include: coordination – a critical element for a successful implementation of a multi-sectoral approach to combat trafficking; information sharing and analysis on trafficking patterns; trends and programmes that will allow the development of better and more effective responses; technical assistance in various anti-trafficking interventions; capacity building of civil society, national and international partners and advocacy; and support to the development and piloting of innovative responses to new and emerging issues. Activities will evolve as services are rendered and will be adjusted through revisions of the work plan.”</p> <p>Note that the second paragraph offers a wide scope for interpretation. For example, for UNIAP to address information sharing and analysis of trafficking patterns, UNIAP carried out a range of activities to better understand how trafficking works (Worst Offenders). UNIAP’s role in providing support to on-the-ground efforts falls within the statement “technical assistance in various anti-trafficking interventions.” The same can be said for the last activity: “support to the development and piloting of innovative responses to new and emerging issues.”</p>	
79	<p>Paragraph 206: Statement: <i>“The urgency in the new team’s response was noted by a strong supporter of the project, who observed that the previous UNIAP team was more careful about process, “this team is too fast, process</i></p>	<p>No amendment. No comments were received to this effect by the evaluation. It is a pity that UNIAP appears to take this in a defensive way, as the statement</p>

	<i>is sacrificed.</i> ” When others have been reported to appreciate the dynamic, it would be appropriate if these were balanced in the same place in the report.	notes; this was helpful advice by a strong supporter of the current UNIAP team.
80	Paragraph 208: Statement: <i>“When the logframe was eventually revised in 2009, it began to deviate more significantly from the original. For instance, inter-agency engagement with COMMIT/SPA listed under objective 1 in the original logframe disappears altogether (despite the fact that UNIAP continues doing this work). Ironically while inter-agency engagement disappears, ‘Private sector engagement with COMMIT’ is added as an output under objective 1. Another key change is that multiple direct activities are integrated into the logframe, including under Objective 1 which is supposed to be reserved for COMMIT policy issues. As the 2009 revised logframe was not approved either by the UNRC or the PMB, it was not used as a basis for analysis by this evaluation.”</i> Private sector involvement was included because it had become a repeated topic in the COMMIT meetings. The RPM was also instructed to actively pursue private sector involvement in a PMB meeting (minutes of which were shared with evaluator). In SPA III, there is also a reference to this in Area 4, PRE 6 –“Private sector cooperation and engaging corporate social responsibility: Increasing efforts to engage the private sector in the fight against human trafficking, through advocacy, sensitization, and engagement in public-private partnership initiatives; strengthening engagement of businesses on codes of conduct; and, building corporate social responsibility in sectors with core business and/or a social mandate relating to anti-human trafficking.” Furthermore, every agreement that UNIAP put in place must be approved by UNDP. The 2009 logframe was approved when UNIAP signed both the SIDA and New Zealand contracts. Thus, it was considered approved. With a DEX project, the final authority is the Principle Project Representative, in this case the UNRC.	No amendment. 1. The statement remarks on the irony that while private sector engagement is listed in UNIAP’s logframe, inter-agency engagement is dropped altogether. It is not criticizing UNIAP for engaging with the private sector. 2. Information provided by UNIAP during Q+A stated that the logframe was not approved by the UNRC or the PMB.
81	Paragraph 209: Statement: <i>“Although it should be noted that other donors called for improved results-based reporting. In any case donor reports with their discreet focus on specific components could not pick up on the underlying tension which was derailing the project i.e. that it was going off</i>	No amendment. Equally, a large proportion of key stakeholders are not happy with the project.

	<p>course in some important respects - which would likely have been picked up had an M+E specialist been in place to track developments." When a large proportion of key stakeholders are happy with the project's progress and implementation, can it be said to have derailed?</p>	
82	<p>Paragraph 211: Statement: <i>"The project constantly struggles to fundraise with some 40% of the regional manager's time allocated to this function. The team has grown in this phase, with the workload split in such a way that staff work across objectives. This makes it a challenge to keep the whole team afloat the whole time. The workload could be organised differently, for example, by designating a minimum number of key posts to do with management and administration, and to service objective 1."</i></p> <p>Based on the budget structure in the Project Document, the project is expected to deliver an annual budget of \$2.2 million, \$7 million of which is earmarked for COMMIT. The project did an analysis in early 2008 to identify what funding had already been earmarked (contracts signed by donors) for this phase. In January 2008, \$1.5 million had already been earmarked, which signified that the project had less than one year budget while being asked to deliver \$2.28 million. It is not surprising therefore that the RPM had to spend 40% of his time fundraising. It should be recognized that fundraising at this level was a great challenge and it is a significant achievement that the project continues to reach this target in terms of delivery and fund raising. It should also be noted that the delivery of Phase II in 2006 was \$1.33 million.</p>	<p>No amendment.</p> <ol style="list-style-type: none"> 1. UNIAP's success in fundraising is noted in para. 212. 2. As stated in para. 212, if the project was facing such challenges on an ongoing basis, the project document and budget should have been revised.
83	<p>Paragraph 212: Statement: <i>"Stakeholders also say that the project has adopted an inefficient fund-raising model by seeking donor funding for specific activities (i.e. research and special projects) rather than mobilizing resources for a larger, more comprehensive project. UNDP internal records also express concerns about the lack of a proper resource mobilisation strategy. The project says that Phase III started with near-empty coffers and an unrealistic budget plan inherited from Phase II which included allocations for personnel and indirect costs but no funds for actual implementation. UNIAP has had to constantly catch-up on fund-raising and was in fact successful at this."</i> It would be helpful to know whether a</p>	<p>Partial amendment.</p> <ol style="list-style-type: none"> 1. Changes made to better reflect efforts made by UNIAP. 2. However, it was nevertheless UNIAP's responsibility to ensure that the project document and budget was realistic and viable, making adjustments to the design if necessary. 2. Three core donors support all objectives of the project including 3 and 4 which would have provided enough funding to cover the amounts mentioned in the comment. The project's fund-raising under objectives 3 and 4 appears to have gone far beyond what was envisaged by the project document in that case.

	<p>majority or minority, or rare stakeholder, made these comments. It is difficult to imagine that many stakeholders would know the details of UNIAP's fundraising model. It would also be interesting to hear further from UNDP's internal records on this issue to learn from them. Funds need to be raised and activities need to be delivered. If it is easy to fundraise for a larger and more comprehensive project, then this should have been done from the start of this phase to avoid having to devote so much time and effort to compete for funding. The Project Document clearly outlines programme activities for Objectives 3 and 4 at \$114,000 and \$167,000 respectively. Some core donors do not support objectives 3 and 4. But despite this, the project was successful in raising these funds. UNIAP staff on many occasions received praise from UNDP finance on UNIAP's ability to raise funding. It would of course be ideal for the next phase to secure full funding prior to project implementation, if this is at all achievable. Recognizing that UNIAP was not initially funded, and looking at the difficult environment for raising funds that has seen partners not funded, criticizing the model for fundraising seems secondary to having raised funds to sustain the project.</p>	
<p>84</p>	<p>Paragraph 217: Statement: <i>“Move the project to the UNDP APRC - the 2009 Mid-term evaluation Phase III suggested the management arrangements were inappropriate and advised considering a move to APRC. This suggestion had been raised in previous years also according to interviewees. The 2009 UNIAP tracking matrix shows that UNIAP preference was at that point to stay as an inter-agency project, “not considered part of any given agency” and “has no plans to act on this unless [it] hears otherwise”.</i> Once again, UNIAP was repeatedly told that the 2009 evaluation was invalid and should not be used as a reference (see several previous references to this). While the report addressed many important issues, it was discounted by the UNRC and other UN agencies as “biased”. From 2009 onward, UNIAP supported the recommendation to go to the APRC (because of the issues faced in having the management oversight be under a single country), but the matrix was edited by the UNRC.</p>	<p>No amendment. Issue already covered in relation to UNIAP comment 22.</p>

85	<p>Paragraph 218: Statement: <i>“Had these recommendations been followed, it is inconceivable that the present crisis could have unfolded since many underlying tensions would have been resolved. Lip service seems to have been paid to successive evaluations and reviews. The mid-term evaluation completed in March 2009, was summarily discussed in June 2009 and not taken up again until a year and a half later in December 2010 when it became clear that management arrangements were hopeless. The 2009 mid-term evaluation, a maligned document, in fact contains a number of pertinent observations buried in the text which were never paid due heed, either by UNIAP or its governing structures. It is also noted that this evaluation was resisted. One donor described the whole episode as “a terrible case of mismanagement by UN system”.</i> UNIAP agreed with the findings in the mid-term evaluation and would have followed them up if it had the permission to do so.</p>	<p>No amendment. Issue already covered in relation to UNIAP comment 22.</p>
86	<p>Recommendation 3 - Objectives implemented separately: Statement: <i>“A firewall needs to exist between these two project objectives with a clear demarcation of staff, budgets, and activities.”</i> As a small project, this recommendation does not seem feasible or cost-effective. Additionally, the evaluator does not present a compelling argument for why such a change would be beneficial in terms of effectiveness, cost-effectiveness, and impact. Please present this.</p>	<p>No amendment. 1. The evaluation does not agree that UNIAP’s current model is wholly effective (see pages 22 – 50), nor that it is necessarily cost-effective (para. 211-212). 2. This is a matter for the re-design stage.</p>
87	<p>UNIAP RMO also submitted corrections to its own data provided earlier in relation to Table 2.</p>	<p>Amendment.</p>
UNIAP China - 8/3/12		
88	<p>Para. 3 Objective 1 - Suggested to clarify that this statement is from one govt or all six as it may cause misunderstanding.</p> <p>[This and all other comments below from UNIAP China made in the text itself and comment boxes. As such link is made to text itself as far as possible here, further questions concerning the comment itself to be directed to UNIAP China).</p>	<p>No amendment. The assessment is not only based on the views of governments.</p>
89	<p>Para. 3 Objective 2 - Would suggest to explain more here about the</p>	<p>No amendment.</p>

	underlying external reasons, otherwise it may lead understanding that it is mainly caused by UNIAP staff ourselves. But our understanding is 90% it is not because of UNIAP staff . Project governance, our seconded class status in UN, other agencies are not willing to be coordinated by a project are all contributing to this at country level	This is discussed at length under Objective 2.
90	Para 3. Objective 4 - This is not so true here in China. Some agencies perceive themselves in a better position to fill the gap however, they don't have the capacity UNIAP has, which include the insight to the situation of the country, the coordination capability with government, and using the funding in a cost-effective way.	No amendment. The report covers UNIAP's programme overall.
91	Para 3 – Sustainability - I would like to argue that UNIAP is in a good position to ensure the sustainability of COMMIT. Sustainability doesn't necessarily mean it needs to go by itself. Any ways of ensuring its being active, energetic, productive is to protect its sustainability. It's obvious as a kind of informal cooperation of six countries, lacking of a solid bridge the effectiveness may be very much reduced.	No amendment. Sustainability is discussed later in the report.
92	Para 4 - This is for whole region or in certain countries? In China, 70/30 focus maintained.	No amendment. The report covers UNIAP's programme overall.
93	Para 6. From operational level, we didn't see any regional and national projects were stopped or negatively affected by those disagreements. The joint efforts is still there which was clearly shown at SOM8 and IMM3. I would argue the disagreement is more at working level not govt level.	No amendment. The report covers UNIAP's programme overall.
94	Para. 6 My personal observation is some other UN agencies created the tension when having dialogue with governments.	No amendment. This is covered in para. 111.
95	Para 7. Will 'by UN ' is more reasonable?	No amendment. See discussion under section 1.5.
96	Para. 12 Thanks!	No amendment required.
97	Rec. 17 (a) I would worry if this is feasible concerning the operational cost. Currently we only have 3-4 staff in each CO. increasing staff seems a challenge.	No amendment. See comment 86.
98	Rec. 17 (b) Will this autonomous unit still be part of UNIAP and funding still	No amendment.

	raised by UNIAP? If so, what will be the difference from current arrangement?	See discussion under chapter 4.
99	Rec 21 I understand this is recommendation for regional level change. Will country level be considered?	No amendment. The report covers UNIAP's programme overall.
UNIAP Cambodia - 8/3/12		
100	Page 6: Objective 1: "a particular concern that the project is not supporting all Governments in the equal and unified way needed to best foster regional cooperation". What does this really mean?	No amendment. See para. 91. 146-152, 107
101	Page 7: Impact: Suggest that quotes are provided to substantiate this statement.	No amendment. This issue is elaborated to the extent possible under Chapter 3, section 2.
102	Page 14: "The evaluation encountered interviewees who feared reprisals for speaking their minds on UNIAP..... " The quotation does not seem to prove that the interviewee feared reprisal.	No amendment. See response to UNIAP comment 23.
103	Page 15: footnote "1Q+A was carried out over a period of 2 months from 21/12/2011 to 17/12/2012." Is it 17/02/2012?	Amendment.
104	Page 17, para 39: give more detail on stakeholder group.	Amendment.
105	Page 18, para 41: add the purpose of trafficking, not just labor exploitation.	No amendment. This is copied from UNIAP's document as stated in footnote.
106	Page 19, para 46: December 15, 2010 ..." Is it 2010 or 2011?"	No amendment. The date is correct.
107	Pag 28, para 66: "UNIAP interacts with a small handful of specialised agencies on a regular basis (ILO, IOM, UNESCO, UNICEF, UNODC); in the past other agencies were involved but have fallen by the wayside for one reason or another." Because the other agencies do not have counter trafficking activities and it is a waste of their time to involve them.	No amendment. There are a variety of reasons as the paragraphs says as to why agencies are not involved.
108	Page 30, para 72 & 73: Most often than not, the workplans and budget were shared with other agencies.	No amendment. This covers UNIAP's programme overall.
109	Page 31: "Agencies say this approach means that UNIAP comes to them for funding and technical support after it has decided what to do instead of working in a genuinely collaboratively at an early stage to agree needs and	No amendment. This is feedback on what stakeholders are looking for from UNIAP.

	potential solutions.” It is not often the case. Sometimes, UNIAP Cambodia puts the draft ideas for discussion. If we do not prepare anything, we would be considered as unprepared.	
110	Page 33, para 84: “ ... UNIAP staff at different levels seem unaware of the wider issues” What are the wider issues?” Please specify.	No amendment. See paras 76 – 82.
111	Page 33, para 85: “..... so if it is unwilling to coordinate its own work with others.” This is not true. We are always willing to coordinate our own work with others as we often convene inter-agency meetings and invite them. In addition, they are invited to the COMMIT meetings.	No amendment. This covers UNIAP’s programme overall.
112	Page 35, para 88: “...generalizations based on inadequate sampling.” This is not true. UNIAP does not generalize the findings unless the sample was properly calculated scientifically.	No amendment. See response to UNIAP comment 40.
113	Page 35, para 89: There is evidence that the recommendations of the Research on Recruitment Agencies have been used. UN-WOMEN Cambodia has used most of the recommendations for their migration project. Association of Cambodian Recruitment Agencies (ACRA) has praised UNIAP in an official meeting with dozens of stakeholders present and said that they would implement all some of the recommendations. WV has also used the recommendations to design their project.	No amendment. No confirmation received from any external stakeholder during evaluation. All interviews asked about benefit and value of project to them, impacts etc.
114	Page 37, para 97: Need recommendations for this.	No amendment. UNIAP may add to recommendations when an implementation plan is developed for the evaluation.
115	Page 39, para 106: UNIAP Cambodia has included M&E components in our national training. In addition, a series of training courses have been planned to build the capacity of the trafficking community. Two of the courses have been conducted.	Amendment.
116	Page 42, para 117: UNDP procedures have been followed. Thus, there should be no issue on this.	No amendment. This is what the para. says.
117	Page 42, para 118: There are no rules on this as UNDP requires the proper bidding process with an amount of US\$2,500 and over.	Amendment. See response in relation to UNIAP comment 51.
118	Page 43, para 120: changing this is difficult or impossible due to donor requirements in disbursement of their committed funding. Page 44, para	No amendment. See following para.

	122: “ the model is undesirable from an administrative and programmatic point of view.” Can clarify and elaborate?	
119	Page 45, para 127: It is not feasible to have timesheet in this manner as it will a lot of time each day to fill in the timesheet.	No amendment. Timesheets are commonly used. The point is however, whether UNIAP can support claims that the required focus is maintained in COMMIT.
120	Page 48, para 139: UNIAP provides more than just technical advice.	No amendment. This section is about technical capacity.
121	Page 50, para 145: Normally, UNIAP gives credit to other agencies when we have joint activities. On the contrary, other agencies did not give credit to UNIAP when we have joint activities with them.	Amendment.
122	Page 55, para 162: UNIAP does not deliver the service itself. For instance, underserved victim project is been run by sub-grantees.	No amendment. See section 1.5.3.
123	Page 57, para 167: Support to the counter trafficking at the national level has also reduced as countries” Please explain in more detail as in reality the support has increased. We believe that UNIAP is an appropriate actor to fill these gaps.	No amendment. See Chapter 3, section 1.4.
123	Page 58: “An informal UN group began meeting in February 2010 ...” This is not transparent. They should have prepared the minutes and shared some recommendations for UNIAP to improve.	No amendment. Already states that there were no minutes.
124	Page 63, para 185: UNIAP Cambodia has a schedule of 4 meetings per a year plus an adhoc meetings when required.	No amendment. Already covered.
125	Page 65, para 197: there should be recommendations on this issue.	No amendment. Already covered in recommendations.
126	Page 65, para 198: “... the conduct of its staff has at times served to aggravate matters.” What is the conduct exactly? To what extent the conduct has contributed to the aggravation of the matters.	No amendment. The evaluation report does not comment on individual staff. The para. is self-explanatory.
127	Page 68, para 211: UNIAP is using the right strategy to raise fund given the funding situation for counter trafficking and the fact that UNIAP does not have core funding like any other agencies. We have found that there are fewer positive quotes than the negative ones. Thus, we would like to suggest the balance.	No amendment. 1. This is covered in para. 212. 2. The balance of quotes is apportioned according to the weight of evidence on a given issue. It cannot be re-balanced to achieve a more positive or negative effect since it is a reflection of the evidence

		collected by the evaluation. If anything, the bias is in favour of ensuring that all positive points about UNIAP are included when it comes to contentious aspects e.g. material relating to objective 2 was analysed twice to ensure that each and every positive point is included. It is should also be noted that quotes are not the only evidence provided in the report.
128	How has the effectiveness of the objectives been measured?	No amendment. This is addressed in comment 10.
US Department of State - 8/3/12		
129	The U.S. Department of State's Office to Monitor and Combat Trafficking in Persons (the TIP Office) appreciates the importance of program evaluation and would like to submit the following comments on the draft report of the recent evaluation of UNIAP.	No amendment requested.
130	The TIP Office has provided support for UNIAP since 2008 because of the project's high quality research and the Strategic Information Response Network (SIREN) reports as well as special projects related to addressing the needs of underserved victims. Our confidence in the project team's ability to deliver has proven warranted. Project activities funded by the TIP Office have been conducted very effectively and the linkage of state-of-the-art research with the COMMIT Secretariat role of UNIAP is cited by the TIP Office and others as a model regional strategy. Further, the evolution of UNIAP is viewed very positively by the TIP Office, which is committed to the most effective use of limited foreign assistance funds. Interagency collaboration is inherently challenging and difficulties are exacerbated in times of increased competition for limited funding. However, the overall tone throughout the evaluation report appears unduly negative and does not serve any of the interested parties.	<p>No amendment requested. TIP's views are already integrated into the report.</p> <p>There appears to be agreement with a number of the evaluation recommendations, and in particular changes to the inter-agency nature of the project. The major changes proposed in this evaluation report cannot be justified without a thorough examination of each objective and a finding that the project does not function well at a number of levels. The recommendations for change go hand in hand with the negative findings.</p> <p>As Para. 12 notes: <i>"Stakeholders tend to have a very segmented vision of the project; seeing their part of the pie and being happy or unhappy with it as the case may be. Those who are served well may perceive the findings of the evaluation as rather negative. Equally, those who are unhappy with the project will be disappointed if their specific complaints are not confirmed. In this divisive and divided picture, there is no ready-made analysis for this evaluation to draw on but a responsibility to look at the big picture and to see how all the pieces fit together."</i></p>

<p>131</p>	<p>With regard to the report’s draft recommendations, the TIP Office provides the following comments:</p> <ul style="list-style-type: none"> • We agree that the project should continue beyond 2013 (recommendation 1) with a significant change in governance (recommendation 6). However, moving UNIAP under the UNDP APRC should be done as soon as possible. Funding is in place to support this transfer and a lengthy transition is unnecessary, detrimental to the project, and will likely jeopardize donor support. • We disagree that UNIAP’s research and SIREN reports and special projects are inconsistent with or may present a conflict with the COMMIT Secretariat role. The recommendation for a firewall (recommendation 3) between the COMMIT activities and all other project activities should be dropped. The TIP Office believes that such a bifurcation would greatly undermine and weaken the effectiveness of COMMIT intergovernmental activities. • We agree that some revision of UNIAP’s objectives is warranted; however, we disagree with the recommended change (recommendation 2). We believe that activities related to interagency coordination should be dropped and as a result the project name should be changed. • We agree that the PMB (recommendation 7) should be dissolved, management should fall under UNDP APRC, and that an Advisory Board involving key stakeholders serve to advise rather than manage the project. • We agree it is important to move forward with dedicated UNDP managerial attention to UNIAP as soon as possible (recommendation 8); however, we believe that UNDP should ensure an expeditious transition to the APRC. This will enable UNDP to give timely attention to ensuring that key project personnel are retained to provide continuity. The decision making regarding the design of the new project should be done by UNDP APRC in consultation with key project personnel and donors and 	<p>No amendment requested.</p>
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	<p>other stakeholders. Thus, we believe that recommendations 9 through 12 related to a year-long transition of the project to UNDP APRC are unnecessary and should be dropped.</p> <p>In closing, we would add that the TIP Office is interested in continuing support for the UNIAP-funded project activities provided that the longstanding governance issues are resolved promptly and in a manner that ensures continuity of key project staff and approved activities.</p>	
Cambodian Government - 8/3/12		
132	We highly appreciate UNIAP staff for the work to support the COMMIT process because they are very committed in counter trafficking work and they have the capacity to carry out work with spirit of responsibilities.	No amendment. Views of Cambodian government are already integrated into the report.
133	We would like to see more quotes on positive aspects of UNIAP's work.	No amendment. The balance of quotes is apportioned according to the weight of evidence on a given issue. It cannot be re-balanced to achieve a more positive or negative effect since it is a reflection of the evidence collected by the evaluation. If anything, the bias is in favour of ensuring that all positive points about UNIAP are included when it comes to contentious aspects e.g. material relating to objective 2 was analysed twice to ensure that each and every positive point is included. It is should also be noted that quotes are not the only evidence provided in the report.
134	It is difficult to tell the exact proportion of the efforts UNIAP has put for COMMIT but we believe that it has exceeded 50%	No amendment. Although it is noted that this comment supports the report's findings under chapter 3, section 1.5.2.
135	Since UNIAP team has worked well to support the COMMIT process as evidence in this draft evaluation, the Cambodian government suggests that the team should continue to support COMMIT beyond 2013 as stated in one of the recommendations from SOM8 in Hanoi.	No amendment requested.
Royal Thai Government -13/3/12		
136	*Deadline for comments extended to 13/3/12 due to a delay in RTG	No amendment.

<p>receiving a translated version of the report from UNIAP.</p> <p>para 173, first bullet which mention "UN stakeholders along with the Thai Government...and failed to take account of their views." We would like to reflect to you that this information is not correct, the Thai Government never have had private discussion with UN stakeholders about ending the project.</p>	<ol style="list-style-type: none"> 1. This comment does not refer to meetings between the RTG and UN stakeholders as a whole. It refers to any communications between parties on the future of the project. 2. This para. is about the perceptions of different stakeholder groups of other stakeholder groups. It is not appropriate to change one without changing them all. A clarification has been added to that effect to para. 173 to cover all stakeholders.
<p>In Annex 5, According to the letter dated 11 November 2010 of the Thai Government to Chairperson of the PMB page 2, para 3) concerning the U.S. Statement, due to the face that at the PMB meeting held on 1 October 2010, we've got 2 letters, the first was the letter from the 5 countries and the second letter was the U.S. Government statement with no letterhead and there was no signature. For the letter with the letterhead and signature, we received on December 2010 after the PMB Meeting through Dr.Saisuree on the occasion that she met Ambassador CdeBacca in Egypt. In this regards, we would like to ask you to put the original letter that we received at the meeting as well. Please see the attached file herewith the U.S. Statement.</p>	<p>Partial amendment. A footnote is added to the report at para. 172 making this clarification.</p>

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