



International Labour Organization

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Evaluation

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This evaluation has been conducted according to ILO's evaluation policies and procedures. It has not been professionally edited, but has undergone quality control by the ILO Evaluation Office

Final Evaluation of the Project: “Better Factories Cambodia II”

International Labour Organization

Lotta Nycander

Independent Evaluator

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Abbreviations/acronyms/explanations

BFC	Better Factories Cambodia
CTA	Chief Technical Adviser
DG	Director General
DWCP	Decent Work Country Programme
DWT	Decent Work Technical Support Team
FGDs	Focus Group Discussions
IFC	International Finance Corporation
ILO	International Labour Organization
ILS	International Labour Standards
IR	Industrial Relations
ITUC	International Trade Union Confederation
LFA	Logical Framework Analysis
M&E	Monitoring and Evaluation
MoC	Ministry of Commerce
MoEF	Ministry of Economy and Finance
MoLVT	Ministry of Labor and Vocational Training
MoU	Memorandum of Understanding
OECD-DAC	Organisation for Economic Co-operation and Development - Development Assistance Committee
OSH	Occupational Safety and Health
PAC	Programme Advisory Committee
Prakas	Ministerial declarations
RGC	Royal Government of Cambodia
ToR	Term of Reference
ToT	Training of Trainers
TPR	Technical Progress Report
DP	Development Partner
AFD	Agence Française de Développement
UCTA	US-Cambodia Textile Agreement
UNDP	United Nations Development Programme
USDOL	United States Department of Labor

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The evaluator is also very grateful to the many persons representing the BFC constituents and stakeholders, including factory workers - who shared information and their views.

Lotta Nycander

Independent evaluator

Executive summary

This is the evaluation report of an independent Final Evaluation of the ILO Project, entitled Better Factories Cambodia (herein referred to as the BFC project, or the Project). It is based on information gathered in a comprehensive documentation review, interviews and a short field visit to Phnom Penh, Cambodia in mid November 2015. The Project phase covered by this evaluation is Jan 2013 to 31st December 2015.

The evaluation was undertaken in accordance with ILO's Evaluation Policy Guidelines, UN Evaluation Group (UNEG) Norms and Standards, and OECD/DAC's recommendations. The data gathering process was participatory to enable and encourage all key actors to share their experiences and information, and contribute to the findings. The evaluation has adhered to ethical standards in the analysis of gathered/processed data and in the reporting and care was taken not to let conclusions in evaluation process be influenced by the views or statements of any particular party.

The evaluation has applied the evaluation criteria: relevance, effectiveness, efficiency, impact and sustainability¹, constituting all of the five criteria recommended for evaluations by OECD-DAC.

The evaluator has used qualitative methods to gather both qualitative and quantitative data and information. The latter was drawn from secondary sources as there is no scope/time to undertake a survey to gather quantitative data. Generally, it is important for the evaluation to appreciate the logic of the design of the Project, and thus the Results Framework, or Logical Framework Analysis (LFA) was examined.

BFC's overall objective is to improve working conditions and business outcomes in the garment sector. It does so by assessing compliance with labour standards and support factories, worker and employer representatives in developing sustainable approaches for upholding labour standards. It aspires to be a neutral, independent assessor of factory conditions and is linking improvement of working conditions and workers' rights in garment factories with increased orders and market access for the products. It is the first of its kind and a forerunner to other ILO Better Work country projects implemented in other parts of the world.

The Project's budget is USD 6,036,584. The donor funds are received from the Garment Manufacturers Association in Cambodia (GMAC), The Royal Government of Cambodia, and USDOL. A substantial amount of the budget consists of the Project's own revenue.

The evaluation has **ten conclusions, three key lessons and eight recommendations**.

These are the conclusions based on the findings:

The first conclusion relates to BFC's **return to public disclosure** and adoption of a more transparent approach in 2014, making Cambodia the only large-scale garment producing country revealing garment factories' level of compliance to the public. It is assessed as critical in rebuilding confidence in the country's commitment to improving working conditions in the industry. (Sub-section 4.1.1)

The second and third conclusions address the **project's design and strategy** and it is assessed that the project is relevant and based on a results framework that is sound and has a logical construction, with a structure that is also found in work plan. It was concluded, though, that *strategy* and *assumptions* need to be given more attention in the design of a future results framework of interventions. (Sub-sections 4.1.2 and 4.1.3)

The fourth conclusion is related to **expansion into new sectors and Outcome 1** of the Project and has three points; **a)** stating that compliance in participating factories has improved during the reporting period, and the number of low compliance factories has reduced over time since the start of transparency; **b)** The planned expansion to reach footwear-producing factories has yielded modest progress and the work is slow, and the work with the 31 sub-contracting factories to export-licensed garment producers is likely to pose a challenge and were, at the time of the evaluation, monitored in preparation for a workable strategy to be developed; and **c)** In view of the staff changes in the Project during the period under review, both staff and stakeholders have expressed that the new management arrangements had helped improve project implementation and relations with constituents. (Sub-section 4.1.4)

The fifth conclusion regards **factories' compliance with national labour law and is related to Outcome 2** of the Project. It is concluded that **a)** BFCs training programme for factories includes topics such as occupational safety and health; sexual harassment; supervisory and managerial skills training and negotiating skills; human resources management skills; among others; **b)** Changed monitoring practices were found to have positively influenced compliance with national labor laws and international labour standards and generated more confidence among stakeholders. A caution is provided regarding securing the "unannounced monitoring visits"; and **c)** advisory and

¹ Terms of Reference.

trainings services have been diversified to include human resource management systems, which further will be broadened with topics such as impact evaluation, marketing (to generate more revenue) and quality control. (Sub-section 4.1.5)

The sixth conclusion is related to Outcome 3 of the Project regarding **policy advocacy for sustainable international labour standards**. BFC has used evidence and information from its long experience in the garment industry to influence buyers, factory practices, and behaviours of both management and workers – and has also been the model (in many of its parts) for the global ILO Better Work global programme – thus its practices have been influential internationally. Some of the research has not yet been completed that could bring out information to be used in advocacy. Regarding policy advocacy the Project has had an impact on the fact that a MOU with GMAC was agreed upon. It also worked with MoLVT on the content of a new ministerial declaration (*Prakas*), gazetted in December 2015, regarding the prevention of hiring/using under-aged workers in the factories. (Sub-section 4.1.6)

The seventh conclusion relates to Outcome 4 of the Project, addressing BFC's **financial viability and national constituents' institutional sustainability**, especially that of the Royal Government of Cambodia. It is concluded here that:

- a) The Project has ensured financial support to BFC in different ways and has extended MoUs with GMAC and the RCG and shown that it has an ability to earn revenue from its training/advisory services and capacity-building courses with 70 percent of the total budget coming from the services at the time of the evaluation mission. The demand for BFC's services remains strong and national management staff has long experience from working in the Project and have been trained to become future leaders. These are all very good achievements and important steps in the direction of becoming independent of donor funds in the future and develop sustainable services.
- b) BFC has not been institutionalised in the sense that it has been referred to in its Project Document. During the period under review no strategy or vision towards institutionalisation had been developed, however in its forth quarter a consultant was commissioned to assess the key stakeholders' views and plans for the future of the BFC.
- c) Working with the MoLVT and MoC is important and should be given due attention as it is closely connected with efforts to keep factories compliant and to generate positive developments in the industry. (Sub-section 4.1.7)

The eighth conclusion addresses the Project's **working relations with ILO key constituents**, as also addressed in Outcome 5 of the Project. The evaluation was not able to identify any direct sense, or sign, of ownership of the Project among key stakeholders. What was detected, however, is a renewed interest for cooperation and association with the ILO Project, which seemingly is linked to the change of the Project management, which took place in 2015. It was also concluded that trade unions are fairly represented in the Programme Advisory Committee (PAC) but for a variety of reasons they are on the margin of the Project's active engagement in the garments industry. This situation may affect BFC's long-term viability adversely if not addressed in the forthcoming project (Sub-section 4.1.8).

The ninth conclusion is about the **concept of gender, including the integration (mainstreaming) of gender concerns in the project**: **a)** The Project has undertaken activities that benefit women workers, however there is a lack of gender analysis and gender strategy and no consolidated documentation on what has been done regarding gender (women, girls, men and boys). **b)** As more information and data is being generated through various studies about both women, men workers and child labors - there are opportunities for new entry points for BFC in the future project to be more engaged and advocate on issues that are relevant in view of gender. (Sub-section 4.1.9)

The tenth conclusion is related to **efficiency, impact orientation and the likelihood of sustainability**. It is concluded that the Project has been efficient in the sense of spending in relation to its targets, and had spent a total amount of USD 5,370,819 out of the total budget at the time of the evaluation. Approximately 70 percent of the budget is from own revenue - a great achievement and one that the Project will/should use to build sustainable services in the future. It was also concluded that the Project has made an important and positive impact. It has managed to build a very capable national management team and is creating revenue from the services it delivers. The evaluation has, however, not been able to identify any willingness among the main constituents and stakeholders to create a financially sustainable national, independent institution under a contractual arrangement with the ILO, as the Terms of Reference for the evaluation as enquired about. (Sub-section 4.1.10)

Three lessons are noted

- ✚ The Project's return to more transparency of the export-oriented garment factory assessments is quite effective as it obviously puts pressure on the garment producing factories to be more compliant with international labour standards;

- ✚ Efforts to mainstream gender, or to integrate gender concerns in employment-oriented technical cooperation projects, should not be overlooked but be dealt with based on thorough gender analysis and gender planning - even though the ultimate target group may consist of women. This is so because the concept of “gender” is a social construct that involves the needs and roles of women, girls, men and boys and any other gender and is not equivalent to “women”; and
- ✚ A Project of this kind should have a Monitoring and Evaluation (M&E) post.

The following are the recommendations emanating from the conclusions:

The Project should, with the help of experts if needed, develop a solid results framework, solid in all its parts including SMART indicators including a solid and realistic strategy building. The strategy must build thorough and transparent consultations with, and participation by the key constituents/partners, as well as civil society organisations.

The Project should abstain from expanding into new sectors as the garment and the footwear sectors (including their respective sub-contracting firms) are big enough for the resources available and still pose many challenges that are yet to be tackled. It should rather renew its efforts to make more impact in the member factories and among the ones that are notoriously non-compliant.

Regarding monitoring practices: **a) BFC and the key stakeholders should** consider that the new Project proposal includes an expert position (with a ToR specifying the responsibilities) on Monitoring and Evaluation (M&E) – serving the whole project, not only the monitoring aspects in relation to factories². The function should be the “right hand” of the CTA; and **b) The Project should** be mindful about making unannounced assessment or monitoring visits really unknown (by the factories) – and consider whether changes need to be made regarding the routines of these visits.

The Project should ensure that research studies that have been started and not completed during the phase are completed and that it is shared with the public. The results of the food and nutrition study for instance – how could it be used in the Project’s policy advocacy vis-à-vis the Government and other stakeholders to the benefit of garment workers?

Following the above-mentioned conclusion about ensuring long-term viability of benefits and outcomes in the industry, the Project and partners should **a)** develop a road map and strategy, in which in particular the rendering of high quality services and marketable pricing are well worked out. This work should be done in close cooperation with the global Better Work programme; **b)** provide joint guarantees that any future training of its inspectors must be accompanied by regular monitoring of performance, including behaviour and attitude change; and **c)** use the momentum of the interest shown by the DG, Ministry of Commerce, in the discussions and consultations to come about the new proposal and the future as he definitely could play a key leading role from the Government’s side.

In the efforts to develop a new strategy for the subsequent project phase, ILO and the constituents should be mindful in building on the new momentum for the Project (after a few turbulent years) to further solidify the improved relations. PAC meetings and other regular consultations need to be held throughout the strategy-building process, to increase stakeholders’ ownership and participation. More attention should be given trade unions, and their role, in the up-coming project proposal as well as the developments of the trade union law.

The Project should ensure that gender issues get a much more prominent role in the new project proposal and that a gender analysis and its findings should serve as a benchmark/baseline, and would help the Project staff to design/implement a relevant gender strategy at the very onset with gender responsive activities. The gender strategy should explain how the Project intends to team up with local organisations in its work to support garment workers, many of whom are vulnerable and live in poverty.

The Project and the ILO constituents should make all efforts to develop an independent entity in order to sustainably continue its factory assessments, advisory and training functions, and to become stronger on policy advocacy. Whether or not this will be done under *contractual arrangement with the ILO* will obviously depend on the willingness (and possibly the resources) of its constituents. Along with increased quality of services, sustainability must be a top priority for Project in the near future namely how to, at least in the long term, sustain the activities currently performed in a project environment. The process should involve broad and deep consultations with key partners and also partners outside the usual stakeholders framework – for the sake of inspiration and – even from actors outside the country.

² BFC organigram/organisational chart showing staff positions.

1. Introduction

This is the evaluation report of an independent Final Evaluation of the ILO Project, entitled Better Factories Cambodia (herein referred to as the BFC project, or the Project). It is based on information gathered in a comprehensive documentation review, interviews and a short field visit to Phnom Penh, Cambodia in mid November 2015. The Project phase covered by this evaluation is Jan 2013 to 31st December 2015.

1.1 Structure of the report

The report consists of four chapters:

- Chapter 1. Introduction - including structure of the report, purpose and objective of the evaluation, objectives, scope and clients/users of the evaluation; and limitations of the study;
- Chapter 2. Evaluation framework - including evaluation approach, criteria and instrument (evaluation questions), methodology and steps in the process.
- Chapter 3. Key findings - including social and economic development, brief background, the Project and its current status, relevance and validity of the Project's design and strategy, effectiveness on the outcomes and outputs, the Project's response to the Mid Term Evaluation recommendations, efficiency and gender issues.
- Chapter 4. Conclusions, Lessons and Recommendations.

There are eight annexes: Annex I. Terms of Reference; Annex II. Evaluation instrument; Annex III. Preliminary findings; Annex IV. Documents; Annex V. Persons consulted; Annex VI. Field programme in Cambodia; Annex VII. Project organisation; and Annex VIII. Evaluation time line.

1.2 Purpose and scope of the evaluation

Purpose and objectives

The **purpose** of the evaluation is i) Determine if the project has made progress towards its stated objectives and outcomes and explain why/why not; ii) Provide recommendations on programme improvement and further action; and iii) Where necessary, identify the possible need to refine strategy.

Several objectives for the evaluation are stated in the Terms of Reference; the main one is “to assess achievements towards the planned objectives of the project to date according to the log frame and respective monitoring indicators, and make recommendations on how to design the interventions that will form the basis of Phase III”. **Other objectives** relate to accounting to the donors, national and international stakeholders for results achieved; Analyse the achievements made identify lessons learned in view of e.g. the changing garment industry, socio-economic and business environment and the planned alignment with the Global Better Work Programme (see evaluation instrument in section 2.3 for detailed questions that the evaluation will attempt to answer)³.

Scope and clients

The ToR states that all components of the original BFC project Logical Framework Analysis (LFA) should be within its scope, however, only one results framework has been identified, which was developed during the former CTA's tenure.

The ToR directs the evaluation to particularly focus on:

- i) Stakeholder engagement and sustainability, namely the level of willingness of the main constituents and stakeholders to create a financially sustainable national, independent institution under a contractual arrangement with the ILO;
- ii) Influencing compliance and policy; and
- iii) Impact of the programme (the scope will be accounted for in all its details in the evaluation report). Assessing how the Project has addressed gender equality as a cross-cutting theme should be part of its methodology and all deliverables, including the final report. How stakeholders view the project - and to what extent it has been able to influence the level of compliance as well as policies/policy making shall be looked at. Lessons and impact, being one

³ Source: Terms of Reference.

of the five core evaluation criteria is also important, i.e. actual changes such as including worker outreach programmes, public reporting and the delivery of training and advisory services⁴.

According to the project management the clients of the evaluation report are the PAC members, while the ToR mentions that the audience of this report is the BFC, the global Better Work project management, the ILO office (ILO Country Office for Thailand, Cambodia and Lao People's Democratic Republic), as well as the project and global programme donors (USDOL, SECO, Australia and the Netherlands). The secondary audience includes national project partners and stakeholders, and international buyers⁵.

Limitations to the evaluation study

Like most research-oriented studies this evaluation study has been heavily dependent on availability of people, organisations and documents. The most important limitation of the evaluation field study was the short duration of the field mission in Cambodia, which in the end amounted to only six full weekdays and one Sunday morning for interviews, meetings and focus discussions (including the presentation of findings). Only one factory could be visited.

Other limitations were that at no point during the field research period could the evaluator sit together with the whole management team, not even during the presentation of the preliminary findings. This was obviously due the work pressure and operational requirements at the end of the year. Finally, no documentation was made available regarding the Project's response to the Mid Term Evaluation's recommendations in 2013 but attempts were made to gather information on this through other means/methods.

⁴ Source: ToR, p. 3 under section *Evaluation Objectives and Scope*.

⁵ Source: ToR.

2. Evaluation framework

2.1 Approach

The evaluation was undertaken in accordance with ILO's Evaluation Policy Guidelines, UN Evaluation Group (UNEG) Norms and Standards, and OECD/DAC's recommendations. The data gathering process was participatory to enable and encourage all key actors to share their experiences and information, and contribute to the findings. The evaluation has adhered to ethical standards in the analysis of gathered/processed data and in the reporting and care was taken not to let conclusions in evaluation process be influenced by the views or statements of any particular party.

2.2 Evaluation criteria

The evaluation has applied the evaluation criteria relevance, effectiveness, efficiency, impact and sustainability⁶ constituting all of the five criteria recommended for evaluations by OECD-DAC.

2.3 Evaluation instrument

The evaluation objectives have been translated into relevant and specific evaluation key questions - the evaluation instrument - to inform the development of the methodology. Below are examples of questions that were posed to the ILO staff and former staff, and to relevant constituents/stakeholders, i.e. government agencies, employers/factory owners and managers, and workers organisations/trade unions, UNDP, and the US Department of Labor (USDOL). In relation to the evaluation questions below, this was a concern "Has the BWC Project been doing things in the right way to ensure that outcomes/objectives are met?" and "Could there have been better ways of achieving results?"

Evaluation questions in relation to the evaluation criteria

Relevance, strategic fit and validity

Relevance is here understood as relating to the extent to which the Project's activities are in line with the priorities and policies of the country/stakeholders and (direct, indirect, ultimate) beneficiaries, as well as the ILO itself and the development partners (donor agency).

- What was the basis on which the BFC project was designed? Was any initial needs assessment, diagnostic study, or baseline study undertaken prior to, or at the start of the Project? Has any gender analysis been carried out?
- How are the objectives and activities of the Project aligned with the relevant national policies, strategies, and priorities? In view of the majority of workers in the garments industry being women, how is the project aligned with national gender plans and goals, and the Cambodia's DWCP?
- What is the relevance and coherence of the BFC project design, strategy and approach?
- What is the validity and SMART-ness of the design of the Project, i.e. how does the project design (i.e. priorities, outcomes, outputs and activities) address stakeholders' needs? How were they identified at the onset, or before the start-up, of the Project?
- How appropriate and useful are the indicators in the project document's Logical Framework Analysis (LFA) in measuring achievements? How are indicators used in monitoring project performance/achievements system, implementation plans, and TPRs?
- What demands (if any) for project activities and/or objectives currently not covered by the project are expressed by the stakeholder categories, including the Government?
- What are the views of stakeholders on the project with respect to its relevance, strategic fit and validity?

Effectiveness

Effectiveness is here understood as relating to the extent to which activity/strategies reach or contribute to meeting the stated objectives.

⁶ Terms of Reference.

Implementation and reaching goals/objectives:

- (If applicable) How has the Project responded to political, legal, economic and institutional changes in the national environment?
- How effective has the Project been to appropriately respond to the needs of the national constituents and partners?
- How has the Project managed to respond to the conclusions, and act on the recommendations made by the Mid Term Evaluation?
- How effective has BFC Project been in reaching/contributing to the five objectives and the stated outputs and in reaching the annual performance targets? What were the major factors influencing the achievement or non-achievement of the objectives and outputs?
- From the buyer's perspective, how effective has BFC been in driving factory level compliance, compared with third party audit companies?
- How have stakeholders been involved in project implementation – what is the level of participation of the stakeholders? How effective has the project been in establishing national ownership?
- What changes have occurred (if any) related to social dialogue in the participating factories? What can be said about the extent of the Project's contribution (in terms of e.g. advisory activities) to such changes? What are the (remaining) challenges?
- How has the Project dealt with issues of gender equality, gender mainstreaming? What kind of progress was made, and what were the obstacles?
- Has any external factors impacted (positively or negatively) on the results and reaching the Project's overall objective/s?

Management arrangements:

- To what level are management capacities adequate (focus is on facilitating results and efficient delivery) and how effectively does the project management monitor performance and results?
- To what extent are roles and responsibilities well understood by all parties involved (including project staff and the stakeholders)?
- How effective has ILO's technical/admin support been provided to the Project?
- How effective is communication between the project team, the ILO and the national partners?

Efficiency

Efficiency is here understood as a measurement of the outputs (qualitative and quantitative) in relation to the inputs. It is applied to assess/determine whether the least costly resources possible were used to reach the intended results.

- How has financial sustainability been addressed in the project's strategy? What are the challenges? Does it need to be reviewed? What is the progress towards the cost recovery plan?
- Have resources been allocated strategically to achieve outcomes? Could resources have been used in alternative, more efficient ways? What is the current rate of budget delivery and commitments?
- Does the program have an effective financial system in place?
- What efforts have been made to improve time and resource efficiency in the delivery of core services?

Impact orientation and likelihood of sustainability

Impact is here understood as concerning itself with the positive and negative changes produced by the Project directly or indirectly, intended or unintended. This involves the main impacts and effects resulting from the activity on the local social, economic, environmental and other development indicators. The examination must also include the positive and negative impact of external factors, such as changes in terms of policy, trade and financial conditions.

- What has happened as a result of the Project, i.e. what impact of the programme can be documented to date on working conditions in the workplace, worker wellbeing, firm performance, policy changes and/or buyer behaviour?

- What real difference has the Project made to the (direct/indirect/ultimate) beneficiaries?
- How many people (and who) have been involved/affected in the Project's interventions/activities (in particular in capacity-building and skills development activities)?
- To what extent has the global M&E framework effectively used to measure the outcomes and impact of BFC?

Sustainability is here understood as concerned with measuring whether the benefits of an activity are likely to continue after donor funding has been withdrawn. Projects need to be environmentally as well as financially sustainable.

- To what extent is it likely that the benefits of the BFC project will continue after donor funding ceased?
- What are the major factors that may influence the achievement or non-achievement of sustainability of the BFC Project?
- Have project staff widened and diversified their skillsets both in terms of core service delivery and in supporting wider project activities?
- What mechanisms, interventions or other activities could be undertaken to enhance the ownership and sustainability of the Project's final "product"? How will the Project services be institutionalised and has time and resources been allocated for carrying out an exit strategy - and communicating about it, or involving the stakeholders in this strategy?
- What are the possible long-term effects of the Project on gender equality? Are any gender-related outcomes likely to be sustainable?

2.4 Methodology and steps in the evaluation process

The evaluator has used qualitative methods to gather *both* qualitative and quantitative data and information. The latter was drawn from secondary sources as there is no scope/time to undertake a survey to gather quantitative data. Generally, it is important for the evaluation to appreciate the logic of the design of the Project, and thus the Results Framework, or Logical Framework Analysis (LFA) was examined.

Methodological triangulation was applied, involving more than one option to gather data, i.e. interviews, observations, brief written questions to selected respondents, and reviewing documents. Emphasis on triangulation was not only done to increase the credibility and validity of the results, and cross-check information to minimise any bias – but also to deepen the evaluator's understanding.

The below indicates sources and methods that were applied to gather information in relation to each evaluation criteria:

- Figure 1. Sources & methods for data collection

Key evaluation Criteria	Documents/sources of information & data	Method to be used
1 Relevance & strategic fit	National policy documents, UN reports (incl. DWCP), action plans, Project document, LFA, TPRs, MoUs, Minutes from PAC meetings, info from staff & stakeholders.	Doc. review, in-depth interviews & meetings with all three ILO constituencies
2 Effectiveness	Project document, TPRs & any M&E reports, reports on capacity building/training; MTE report, info from staff & stakeholders.	Doc. review, in-depth interviews with ILO staff and DPs & other stakeholders (GMAC, Ministries); and donor agency. Collection of qualitative & quantitative information, data. FGDs with factory managers, buyers, and trade unions, and PIIC. Discussions with Factory owners and mid-management.
3 Efficiency	TPRs, work plans, budget and expenditure documents, donor reports, financial reports/documents & info from Finance/Admin project staff.	Doc. review, Interview,

Key evaluation Criteria	Documents/sources of information & data	Method to be used
4 Impact and sustainability	MTE report, TPRs, M&E reports, info from manufacturers/buyers/factory reps/unions/Gov't.	Doc review, discussions & meetings, in-depth interviews, e-mail correspondence.

Comprehensive documentation review

The evaluator has studied the overall context in which the Project is operating. At the time of starting the field programme in Cambodia, a number of documents had been received, and more were received during the course of the field study in Cambodia and even afterwards. See the list of documents consulted in Annex IV.

Data and information gathering during a field visit in Cambodia November 2015

In-depth interviews were held with two officials at ILO Headquarters, Geneva and the ILO National Programme Coordinator in Phnom Penh. The Project's Chief Technical Adviser (CTA) and Technical Adviser were interviewed several times and in-depth interviews were also held with the Project's managers and the finance and administrative officer.

Interviews were also held (in-depth, one hour or more) via Skype, with the former CTA and an international consultant (former ILO Director Regional Office of Asia and Pacific) engaged to help develop ideas and gauge the interest of key stakeholders about the future programme and in particular, sustaining its benefits. Also a representative of the donor agency, USDOL, was interviewed in-depth via Skype. A set of written questions was sent by e-mail to representatives of the global BW programme, and replies have still not been received.

An interview was done with a UNDP representative and another UNDP official who is a former CTA of a woman empowerment project was contacted. Formal meetings were held with two ministries, the Ministries of Labor and Vocational Training, and Commerce. A meeting was held with the employers organisation in the garment industry (GMAC), and more informal focus group discussion were done with buyers, factory managers, trade unions and (female) garment factory workers.

E-mail correspondence and a brief set of written questions

E-mail was used to gather more information and to enrich the triangulation and validation process.

Validation meeting

At the end of the data collection phase, the evaluator presented the preliminary findings using a PPT. This was a valuable opportunity where the participants express and shared their views/information/data on the progress and provide feedback for consideration in the report.

Reporting

An inception report was submitted to the ILO Evaluation Manager on 13th November. This is the first draft report that followed. It is expected that written, consolidated, comments will be received through the Evaluation Manager, for the final report (January 2016).

Ethical considerations

The evaluator has been mindful of ethical standards in the analysis of gathered data and in the reporting. Observations and triangulation/cross-checking of information was applied to increase the credibility and validity of the results and, to the extent possible, minimise any bias. The evaluation has complied with ILO and UN norms and standards, and code of conduct as spelled out in UNEG's ethical Guidelines for UN evaluations⁷.

⁷ The evaluator was guided by the ILO Policy Guidelines for Results-based Evaluation: principles, rationale, planning and managing for evaluations (2013) and ILO Guidance Note No.4: Integrating Gender Equality in Monitoring and Evaluation of Projects (March 2014).

3. Key findings

The below are the key findings of the evaluation, mainly structured according to the Project's results framework, but not limited to it. The evaluation criteria have been applied to help illustrate the weight and/or worth of the findings.

3.1 Social and economic development

Due to political stability, market reforms and pro-investment policies, Cambodia has had an exceptional development over the past decades with an economy that has grown on average at 7.7 percent per annum from 1998-2010 - the fastest growing economies in ASEAN and Asia. Tax exemptions and import duty exemptions have attracted foreign investors to the country - particularly to the garments, construction and tourism industries that have driven the economic growth⁸.

The economic growth has contributed to poverty reduction with a decline in the poverty rate from around 53 percent in 2004, to less than 20 percent in 2014. At the end 2013 and beginning 2014, the country experienced strikes with violent clashes in relation to the minimum wage negotiations. The Minimum Wage in the garments industry was in October 2015 raised to USD 140/month.

However, the narrow based economy has made the workforce vulnerable to outside shocks and raised concerns regarding the solidity of its development foundations⁹. Thus, economists and experts in the international community have expressed concerns regarding the need to increase economic and industrial diversification, enhance labor productivity and develop domestic industries to focus on quality and connect with global production value-chains¹⁰.

3.2 Brief background to the Project

BFC's overall objective is to improve working conditions and business outcomes in the garment sector. It does so by assessing compliance with labour standards and support factories, worker and employer representatives in developing sustainable approaches for upholding labour standards. It aspires to be a neutral, independent assessor of factory conditions and is linking improvement of working conditions and workers' rights in garment factories with increased orders and market access for the products. It is the first of its kind and a forerunner to other ILO Better Work country projects implemented in other parts of the world.

The US-Cambodia Textile Agreement (UCTA), negotiated in 1999, led to a major take-off of Cambodia's export garment industry and gave Cambodia higher garment export quotas into the attractive US market in return for improved working conditions and labor regulations. In *"Best practice" in the Regulation of International Labor Standards: Lessons of the U.S. - Cambodia textile agreement* (by Don Wells p. 361) the following is stated:

"...it contributed importantly to the promotion and protection of labor rights and standards in Cambodia's garment industry, and is the best example of links between enhanced trade and improvements in labor standards in the global South. It demonstrates that under certain conditions, international trade agreements are capable of creating a reasonably stable floor for a range of international labor standards."

The UCTA agreement ended in 2004, along with the global garment quota system, however, decision- and policy makers have continued this approach even after the formal ending of the agreement. The Ministry of Commerce made it mandatory for all factories to be assessed/monitored by the BFC, in order to receive an export licence. It was evident that the buyers of Cambodia's garments view improved labor conditions and workers' rights as valuable and adding to the reputation of the brands – and they use the BFC reports to assess the level of suppliers' compliance with labor standards. In some cases orders are shifted from one supplier to another if problems are not solved or conditions are not improved¹¹.

For a number of years BFC focused mainly on assessments of the level of compliance to labor standards in garment factories¹². In 2013 the Project extended its activities to include also advisory services, apart from assessments and training services (the latter provided since 2004). That year, after the BFC project had been in operation for a decade, it was apparent that about 40% of the factory owners in the garment industry were still not willing to make any

⁸ Source: *Cambodia Competitiveness and Linkages in Cambodia's Manufacturing Sector*, A Discussion Paper, UNDP Cambodia, 2014.

⁹ Source: *Decent Work Country Programme Cambodia (2011-2015)*.

¹⁰ Source: *Cambodia Competitiveness and Linkages in Cambodia's Manufacturing Sector*, A Discussion Paper, UNDP Cambodia, 2014

¹¹ Source: *Combining Global and Local Forces: The Case of Labor Rights in Cambodia*, Sandra Polaski, <http://carnegieendowment.org/files/WDCambodia1.pdf>. This article originally appeared in the May 2006 (Vol. 34, No. 5) issue of *World Development*.

¹² The Global programme's approach involves *both* assessments, and advisory and training services from the start.

changes in the conditions despite BFC's regular monitoring and reporting on compliance deficits. In February the same year, a group of researchers undertook a study¹³ in Cambodia stating the following¹⁴:

"BFC's ability to address (these) problems effectively is constrained by the fact that, like most private factory inspection regimes, it focuses on uncovering labor rights violations by factory owners, and for the most part does not address buying practices by brands and retailers that strongly contribute to these conditions. Yet even taking this limitation into account, BFC's current operating practices also contribute to the program's under-effectiveness, due primarily to a glaring lack of transparency and an institutional overemphasis on protecting the interests of factory owners and international buyers, rather than responding to appeals from garment workers to protect them from abuse."

Public Reporting – toward public disclosure

In 2013, BFC began the preparations to introduce the Public Reporting for Improvement (PRI) approach using more transparency in its reporting in order to push the least responsive factories to comply. This meant that the names of the factories that were non-compliant were publicised on the Project's website – but all factories were granted a grace period in which changes could be made *prior* to public disclosure. In September 2013, ILO could announce that BFC would return to limited public disclosure of assessment results with release of reports beginning January 2014 *based on the monitoring of over 450 factories*.

GMAC strongly opposed this move and insisted that the Project would first inform the Government before any disclosure was published¹⁵. GMAC released a newspaper advertisement on 30 December 2013, signed by the Secretary-General, stating that although it is in favour of public disclosure they do not feel that BFC had consulted GMAC sufficiently. It addresses its members in this announcement, informing them publicly that BFC staff who seek access to factories for monitoring visits should be accompanied by officials of the "Royal Government of Cambodia and/or possess letters from the Government authorizing such access to the factories"¹⁶. The BFC manager did not agree to how this had been portrayed in the press claim and stated in a response to GMAC that the discussions with GMAC, and other stakeholders, about BFC returning to a transparent approach stemmed from September 2012.

A turbulent phase in the project's long history in Cambodia thus marked 2013-2014 with an exchange of communications in a heated debate published not only local media, but also the international press. A virtual breakdown in rapport between the Project and GMAC was a fact. This had not been completely repaired at the time of this evaluation but had started to improve with the new Project management¹⁷ claimed by both GMAC and government officials.

In a discussion with the Evaluator, it was clear that GMAC has viewed the Project as a burden, and in the view of the garment employer's representatives it had not helped develop the sector. On the contrary it was scaring away potential investors and announcing to the world that Cambodia is a risk country as regards investing in garments. Still, there was no indication in the discussions with the Evaluator, or statement to the effect that GMAC wished that the Project should not continue.

The public reporting based on BFC's standard assessment report actually materialised in January 2014 after the eight-year pause of not disclosing results¹⁸. The first fifty factories that appeared in public reporting during the first cycle of the transparency initiative was done already in December 2013, followed by another eleven factories that were at the very "bottom" of the industry.

This resulted in some changes toward compliance, which was a direct effect of the first public disclosure report in March 2014¹⁹. Articles about the garment industry appeared in the Wall Street Journal, Guardian, and New York

¹³ *Monitoring in the Dark*, 2013 (p. ii), a report produced by researchers from International Human Rights and Conflict Resolution Clinic Stanford Law School & Worker Rights Consortium (source: <http://humanrightscclinic.Stanford>). This report caused a "splash" as it is critical to the Project's (then) approach and seemed not well received by the ILO project management, and was not part of the documentation handed to the Evaluator as for the documentation review.

¹⁴ The Project has stated that it is important to appreciate that it was not this report that motivated the Project to return to the transparency approach, as discussions had been going on regarding the issue with the tripartite partners for a few years. The *Monitoring in the Dark* report has (reportedly, and according to the Project) many errors - but was still used by the BFC to make its case to be transparent in its reporting on compliance (Source: written comment from Project).

¹⁵ Source: *ILO Initiative Could Unravel Cambodia's Garment Industry: Manufacturers*. In Radio Free Asia, October 5th, 2013.

¹⁶ Source: Discussion with the former CTA to BFC, and the said announcement.

¹⁷ Ibid.

¹⁸ The non-compliance disclosure approach has not yet been part of the other country projects of the global programme, except the one in Haiti but similar public disclosure will be implemented in most of them (source: TPR 1st Q 2014 and interview with ILO headquarter staff).

¹⁹ BFC TPR.

Times. There was also increased attention to the industry due to the police having opened fire on protestors in connection with a strike in January 2014 – during which several workers got killed.

A new Memorandum of Understanding - December 2013

The same year, the Memorandum of Understanding (MoU) that specified the relationship between the government, GMAC and ILO, was signed containing supplier information, duties to be fulfilled by the factory and BFC, as well as the services that the Project would provide. It has been renewed in 2008, 2011 and (the latest) on 18th December 2013²⁰. BFC's mandate in this MoU is described as:

“..helping to build the economy and competitiveness of Cambodia through performing assessments on the working conditions in garment factories based on Cambodian Labor Law and internationally recognized core labor standards, and to report on its findings publicly by detailing compliance and non-compliance of individual factories that fail to meet the legal requirements in Cambodian Labor Law and internationally recognized core labor standards.”

It further states that BFC's reports with findings intended for public disclosure will be shared with Ministry of Commerce and Ministry of Labor and Vocational Training and that non-compliant factories shall remedy the deficiencies in the report within 60 days upon issuance of BFC's assessment reports²¹. A separate agreement exists on child labor, signed by ILO and GMAC in 2013, stipulating the process of investigations on suspected cases of factories using child labor²².

Conclusion

The return to public disclosure/ transparency approach in 2014 - after eight years of having been abandoned – makes Cambodia perhaps the only large-scale garment producing country to disclose factory-level compliance. It is critical in rebuilding confidence in the country's commitment to improving working conditions in the industry. The Project's actions in restarting this process was strongly opposed by GMAC. It led to a turbulent period for the Project during 2013-2014 with disturbed rapport/working relationships the organisation and the Project but relations had improved at the time of the evaluation field mission.

3.3 The Project and its current status

The BFC II is a **technical cooperation project** implemented by ILO. It may be ILO's longest running project. It is innovative, originating from the time of the US-Cambodia Textile Agreement (UCTA) between the Royal Government of Cambodia and the United States in 2001²³. It is committed to supporting the competitiveness of the Cambodian garment industry and helping to build the reputation of Cambodia as an ethical sourcing destination²⁴.

It currently employs thirty-seven staff members and is located in an office in Phnom Penh. About two thirds of the staff is involved in factory outreach. A CTA is heading the Project, and has only been on her post since April 2015. A Technical Specialist was recruited in January the same year. The national management team consists of five managers. Since the CTA arrived, then there have been changes in the management set up, e.g. one manager each is responsible for the areas of advisory and training services, respectively, and one additional staff member has been promoted to a manager. Oddly, there is no position of Monitoring and Evaluation (M&E) Specialist, which a project of this magnitude ought to have.

The **budget** is USD 6,036,584 (see section 3.9 for the details). The donor funds are received from the Garment Manufacturers Association in Cambodia (GMAC), The Royal Government of Cambodia, and USDOL. A substantial amount of the budget consists of the Project's own revenue.

The **key stakeholders** to the Project (also clients/users of the evaluation report) include ILO's constituents, namely representatives of the RGC; and the Employers associations and Workers/trade unions, represented in the Programme Advisory Committee (PAC)²⁵:

- Ministry of Labor and Vocational Training; and Ministry of Commerce (representing the Government);
- Garment Manufacturers Association in Cambodia (GMAC); (representing the Employers/Buyers); and

²⁰ Source: Memorandum of Understanding (MOU) between Royal Government of Cambodia, Garment Manufacturers Association in Cambodia and International Labor Organization on I10 Better Factories Cambodia Programme, signed 18th December 2013.

²¹ PAC Meeting Minutes, 14 November 2014

²² This an Agreement on “Child Labor Protection” dated on April 8, 2014.

²³ Source: BFC Project Document.

²⁴ Source: <http://betterfactories.org/transparency/>

²⁵ The Ministries are represented in the PAC through their officials from different departments.

- Cambodia Labor Confederation (CLC), Cambodian Federation Independent Trade Union (CFITU) and National Independent Federation Textile Union of Cambodia (NITUC) (representing the trade unions), National Union Alliance Chamber of Cambodia (NACC), Cambodian National of Confederation (CNC) and Cambodian Confederation of Unions (CCU).

BFC is designed to benefit not only ILO's constituents (Government, Employers and Workers associations) and the ultimate beneficiaries (garment factory female and male workers) but, according to ILO, also to benefit consumers in Western countries²⁶ and help reducing poverty in one of the poorest nations of the world. It thus helps factories to improve its working conditions and productivity, and works with the Government and international buyers to “ensure a rigorous and transparent cycle of improvement”. Its core strategy is monitoring and reporting on labor conditions in Cambodian garment factories according to national and international standards²⁷.

Its role is to provide independent monitoring/assessment services, training and advisory services and generally concern itself with non-compliance in the export garment factories in Cambodia. The ambition for the current project period is to “maintain its core assessment/monitoring services in the garment sector” and direct more resources to address non-compliance, influencing various behaviour of some of the key players and address policy issues – all of which are intended to have effects on the country's labor environment within the formal economy. A strategy on how to tackle the issues at hand has been developed and is described in the Project's steering document, i.e. the Project Document²⁸.

The BFC project should contribute to five outcomes:

- Outcome 1. Better Factories Cambodia has expanded its scale of operations and impact on the working conditions of Cambodian workers.
- Outcome 2. Compliance with national labor law and international labor standards has increased in tandem with strengthened impact of programme interventions.
- Outcome 3. Better Factories Cambodia has used evidence drawn from its operations to influence change in policy, buyer and factory practices and worker behaviours.
- Outcome 4. The long-term viability of the Better Factories Cambodia and its outcomes has been improved.
- Outcome 5. Governance and stakeholder ownership of Better Factories Cambodia has been maintained or improved.

There are 12 outputs in total, expected to contribute to the above-mentioned outcomes²⁹: Output 1.1. Bundled monitoring and advisory services are being voluntarily subscribed to by a significant number of factories producing footwear for export:

- Output 1.2. Subcontractors to export-licensed garment producers are identified by BFC in collaboration with mandated government agencies, enabling more subcontractors to be integrated into a transparent and monitored production chain.
- Output 2.1. Regular monitoring activities are maintained and strengthened to assure the reliability of monitoring and confidence in monitoring reports among BFC stakeholders, and to positively influence compliance with national labor laws and international labor standards.
- Output 2.2. BFC advisory and training offerings and operations are maintained, diversified and broadened to include, among other things, human resource management systems approaches and offerings for the targeted industries.
- Output 2.3. Activities are undertaken on a regular basis to ensure quality control, consistency and adaptation of BFC services to Better Work and best practice.
- Output 3.1. Greater amounts of information are collected from and delivered to workers, employers and the public outside the framework of regular monitoring visits and training activities.
- Output 3.2. Data collected from BFC research and monitoring activities is used to accelerate improvement in working conditions.

²⁶ ILO Website: http://www.ilo.org/asia/whatwedo/projects/WCMS_099340/lang--en/index.htm

²⁷ Ibid.

²⁸ Better Factories Cambodia, Project Document, ILO, p. 6.

²⁹ Source: Work Plan 2015

- Output 4.1. Options for strengthening BFC model for greater efficiency and impact are explored, and appropriate financial support by key stakeholders secured in order to increase the programme's viability.
- Output 4.2. Public authorities' capacity to improve labor law compliance is strengthened and labor inspectors' capacity in specific areas, particularly in respect of OSH issues, is improved.
- Output 5.1. Local stakeholders' support to BFC is maintained and the programme's governance structure improved and capacity strengthened.
- Output 5.2. Communication and liaison with international buyers are reinforced, aiming as far as possible to provide services consistent with stakeholders' expressed needs.
- Output 5.3. Contribution is made to create an enabling country and sectoral environment to facilitate the overall operations of the BFC programme.

The programme is part of global Better Work programme, a joint initiative of ILO and IFC based on BFC experience to diversify its services with a particular focus on quality enhancement³⁰. Better Work global combines the expertise of the ILO in social dialogue and labor standards with that of the IFC in private-sector development, where it holds investment clients to high standards of performance in labor and working conditions. The Better Work strategy was created around the respective strengths of these organizations, resulting in a unique effort with high international credibility³¹. The overall objective is defined as “to improve sustainably the lives of workers by improving legal compliance with national labor law and international core labor standards, while increasing the competitiveness of the Cambodian garment and footwear industries”.

The workers in the export garments industry, the majority of whom are women, as well as the workers unions/organisations are described as the ultimate beneficiaries, direct recipients, as well as indirect beneficiaries of the Project's actions³².

At the time of the evaluation field mission, there were 554 active (and registered) garment and footwear factories involved with the BFC, and as many as 538,855 workers. Out of these, 74 factories receive advisory/training services.

3.4 Relevance and validity of project design and strategy

The evaluation has found that the Project has proved to be relevant as it directly contributes to UNDAF 2011-2015, Outcome 1, and specifically Output 1.3.2. It also contributes to four out of the thirteen outcomes of Cambodia's Decent Work Country Programme (DWCP)³³ covering 2011-15 and works, under the global Better Work programme³⁴. As this chapter will show, it has become even more relevant after it started sharing information and data with the public about the results of its factory assessments (among other information) through its online reports – an action which was abandoned in 2008 and again picked up in early 2014.

The BFC Project stated at the onset of its three-years implementation period (January 2013 – December 2015) that it would maintain its key assessment services in the garment industry and direct more efforts and resources to address root causes of non-compliance practices. It aimed at sustaining changes already made, as well as influence people's behaviour. Policy issues would also be addressed in attempts to influence Cambodia's labor environment (in the formal economy).

The **Project's results framework** is overall well designed, with three exceptions:

- a) The assumptions are all within the reach/possible *influence of the Project* and thus do not qualify as assumptions in a results framework.
- b) The multi-pronged strategy has five components and it was found that number 1, 4 and 5 of these (see below) are basically the same as the Project's Outcomes:
 1. Expand the scale of BFC operations to cover the footwear sector and sub-contract factories in the garment sector;

³⁰ Cambodia Decent Work Country Programme (DWCP), p. 37.

³¹ Source: <http://www.dol.gov/ilab/projects/better-work/>.

³² P. 8, BFC Project Document.

³³ The DWCP had been evaluated not long before the Evaluation Field mission in Cambodia but the report was not ready to be shared (source: ILO Programme Coordinator).

³⁴ ILO implemented Better Work global programme is the umbrella for Better Work country projects in Bangladesh, Cambodia, Haiti, Indonesia, Jordan, Lesotho, Nicaragua and Vietnam.

2. Strengthen assessment/monitoring quality and broaden training and advisory service offerings with a view to focusing on impact of interventions;
3. Accelerate change and influence stakeholders' behaviours;
4. Increase BFC's Financial viability as well as national constituents' institutional sustainability, especially that of the RGC;
5. Governance and stakeholder ownership of Better Factories Cambodia has been maintained or improved³⁵ (source: BFC Project Document).

Conclusion

It is concluded that the Project is relevant and even more so after its public disclosure approach took off. Its results framework is basically sound but assumptions and the strategy are not well worked out and need to be given more attention in the up-coming project proposal.

3.5 Effectiveness on the outcomes, outputs and management arrangements

Outcome 1. Better Factories Cambodia has expanded its scale of operations and impact on the working conditions of Cambodian workers.

It was found that the scope of the Project implementation is very ambitious. Still, much of the planned work has been implemented and only a few planned activities and outputs have been cancelled.

The Project returned to transparency in its reporting on factories' compliance in 2013/2014. This action had four objectives, according to its website, namely:

- Build the Cambodian garment industry's reputation for decent working conditions and keep pace with competing industries where disclosure of ILO factory compliance data will soon be the norm;
- Bolster enforcement efforts by the Royal Government of Cambodia;
- Spur significant changes in chronically non-compliant factories; and
- Accelerate improvements in working conditions on critical issues across the industry.

It has reported that public reporting has demonstrated important improvements, for instance regarding severance payments, emergency preparedness and payment of bonuses. Positive changes attributed to the BFC are also reported in the area of regarding working conditions, increased worker-management cooperation in factories and greater commitment; or pressure from the buyer for the factory to make changes.

However, not all the 21 critical issues that are part of the public reporting have been dealt with, or improved in the factories thus more efforts are required in this respect. Overall compliance levels show a slight increase, and positive changes are mostly due to the Employers being more committed in dealing with working conditions, or due to the buyers' pressure. Negative changes can result from a factory's business declining, leading them to deprioritize working conditions or changing in management, as is mentioned in a project progress report³⁶.

The Project produces *synthesis reports*, the latest one is the 32nd covering 1 May 2014 - 30 April 2015. It states that there are slight improvements in garment factory working conditions, although issues of overtime and occupational safety and health continue.

It also produces *transparency reports* that are published every six months, the most recent report at the time of the evaluation mission covered Jan - Jun 2015. With the release of its fifth report of factory-level compliance data, the online transparency database contains information about 495 assessments covering 380 factories — 70% of the garment factories in Cambodia that possess export permits. The factories that are most notorious for their non-compliance have not yet made the required changes, particularly regarding workers' overtime and Occupational Safety and Health (OSH). The compliance levels are sorted under Low Compliance, Critical Issues, and Union Disclosure. This latter category is listed under "Low Compliance" (now sixteen factories) with the numbers having gone down, albeit slightly, from 9.9% in the second cycle assessments, to 4.7% in the fifth cycle (5th report)³⁷.

The Project has shifted from carrying out assessments in factories, only, to offering so called bundled services encompassing both assessment and advisory services. In the footwear producing factories, it always provides bundled services. It has attempted to work not only with garments but also footwear producing factories. The

³⁵ Source: Executive Summary, BFC Project Document.

³⁶ Source: BFC TPR To USDOL October 2015.

³⁷ Source: <http://betterfactories.org>

footwear producing factories are invited to take part in the BFC on voluntary basis – however the evaluation learnt that the buyers direct the factory owners to work with the Project. The total number of footwear factories that have been part of the program in the reporting period is 10 (by 31st December 2015). In October 2015 it was reported that only seven footwear factories were under BFC bundled services and four footwear factories completed their current cycle in 2015, while three are being reviewed for their continuation with the programme (output 1.1)³⁸.

The Project is aiming to reach and work with the sub-contractors to export-licensed garment producers (output 1.2), which are rapidly growing. Activities have consisted of monitoring, and in some cases provision of advisory services, covered 31 sub-contracting factories (this was the reported figure at the time of the evaluation). The intention is to promote full bundled services but there is uncertainty on how to tackle this challenge in the best way. Background research on subcontracting arrangements has also been undertaken. This is reportedly aimed at helping define a differentiated strategy to tackle this “subsector” due to the fact that it is varied and complex³⁹.

The work of integrating these work places/factories to be part of the programme’s monitoring realm and a transparent production chain was to be done in conjunction with mandated government agencies.

Regarding BFC’s management arrangements, and its effectiveness, the Project is managed by a CTA who is responsible for the overall administrative, operational and technical management and oversight of the programme.

The post was vacant for a few months, after the former CTA had left but was filled in April 2015. The CTA reports to the Country Director for Thailand, Cambodia and Lao PDR for project management and implementation. She also reports to the Better Work Global Operations Manager based in Bangkok for programme support and technical guidance. Technical support is also sought from the Decent Work Technical Support Team, also based in Bangkok.

A Technical Specialist was also internationally recruited in 2015, to assist the CTA in improving the quality of core services, in cooperation with the others in the management team, and who is coaching the national monitors to ensure optimisation of staff performance as well as service quality. There has been no indication, or information, that these arrangements - which had undergone some changes at the time of the evaluation - are not sufficiently effective to run the Project, on the contrary staff expressed that the new management arrangements had helped improve project implementation and relations with the partners.

Conclusions - Outcome 1

- a) Compliance in participating factories has improved during the reporting period, most likely to be attributed to the BFC project and the number of low compliance factories has reduced over time since the start of transparency.
- b) The planned expansion to reach footwear-producing factories has yielded modest progress and the work is slow, and the work with the 31 sub-contracting factories to export-licensed garment producers were being monitored at the time of the evaluation in preparation for a workable strategy to be developed. The work has proved to be a challenge.
- c) There has been no indication, or information, that the management arrangements - which had undergone some changes at the time of the evaluation - are not sufficiently effective to run the Project, on the contrary staff expressed that the new management arrangements had helped improve project implementation and relations with the partners.

Outcome 2. Compliance with national labor law and international labor standards has increased in tandem with strengthened impact of programme interventions.

Changes have been made to strengthen and increase relevance of BFC’s regular monitoring practices (output 2.1), necessary to generate confidence among stakeholders - which was found to have positively influenced compliance with national labor laws and international labor standards (ILS).

The programme is now covering 74 factories. The number of visits has been growing steadily with 263 visits in 2014 alone, and 574 visits carried out in the full reporting period⁴⁰.

BFC monitors all factories every 12 to 15 months. There are additional visits to low compliance factories conducted together with MOLVT and MOC, but they are not full assessments. The Evaluator was informed that the Project is planning to increase the coverage of advisory services, but carry out less monitoring for the more compliant factories. This is linked to changes in the Project model and this year, BFC is planning to start measuring some

³⁸ Source: BFC TPR to USDOL October 2015.

³⁹ Source: Written comments from Project staff, and discussions with senior staff.

⁴⁰ Source: Better Factories Cambodia (BFC), Better Work Indonesia (BWI), Better Work Vietnam (BWV), Technical Cooperation Final Progress Report, International Labor Organization, 30/06/2015.

differentiation criteria, which will help determine whether it can do less monitoring in those factories that meet those criteria. This is part of a BWG wide effort.

The Project had recruited a consultant to investigate suspected cases of child labour and after the evaluation field visit, and as this is a task that is continuous and the consultancy has been transformed to a 50 percent fixed position in the Project team⁴¹.

To support factories, BFC provides good practice sheets and training on Occupational Safety and Health (OSH), supervisory and managerial skills training, and negotiating skills among other topics. The Advisory Services program helps factories make improvements by providing continuous guidance as they develop and implement action plans to help them achieve improvement goals. BFC factory advisors also help factories establish a Performance Improvement Consultative Committee (PICC), which is a joint management-worker committee at factory level tasked with developing and implementing improvement plans.

BFC advisory and training offerings and operations seem to be quite well in line with its plans and include human resource management systems approaches and offerings for the targeted industries, as well as staff training in various subjects (output 2.2).

Examples of training (2014-2015) are training on OSH for officials of the Department of Occupational Health and Safety (DOSH) and the Labour Inspectorate, MoLVT (39 managers and inspectors). Other training events were on the labour law and fire safety (46 factories attended in these training courses, including 60 participants, 29 of who were women) categorised as *single issue* training. Examples of *customized* training are to address the sexual harassment at the workplace (for factory middle management, union representatives, supervisors and workers); and BFC training on the labour law focusing on compliance issues related to *freedom of association and relations with multiple unions* (18 H&M suppliers). The latter involved 19 factories and in total 639 participants, 492 of who were women. Other training subjects were *supervisory skills training*, *human resource management system training*, *BFC-Gap workplace cooperation training* and *Learning seminars on Management Systems*⁴².

Training on impact evaluation is going on; as is improving the marketing of the Project's training services to generate more revenue; upgrading training courses for staff and better quality control (Outputs 2.2. and 2.3). The quality issue was pointed out as important by the representatives of some of the buyers in a focus group discussion with the Evaluator. They stated in unison the need for improvement of assessment quality and standardised advisory services and capacity of industrial relations (IR) in all factories - not only the BFC advisory factories. The planned percentage of female training participants - 70 percent - has not yet been reached; the figure was only 52 percent, despite the fact that the majority of the workers in the industry are women. The progress report explains that this may be linked to a somewhat lower representation of women in management/technical roles in factories and in union leadership.

The BFC databases have been fully integrated with Better Work global's database on May 1 2015. A child labour investigation and remediation protocol and process was been put in place and agreed upon in a Memorandum of Understanding with GMAC in December 2014.

In interviews with sr. project staff and some stakeholders, the **issue of the Project's unannounced visits was discussed**. Individual staff members get to know on a Friday afternoon, about the visits they will carry out on the following Monday, and drivers are informed at the moment they go the factory. Apparently, there is a notion among some partners that somehow the factories get to know beforehand that the Project is going to make visits to the factories. The Project has urged union representatives many times to be specific in making this particular comment, but so far has not received any proof of leakage of this information.

It is here suggested that the Project could consider if there is a way to make the visits even more secure and not, for instance, let a whole weekend go by for the preparations of a factory visit.

Conclusion - Outcome 2

- a) BFCs training programme for factories includes topics such as OSH, supervisory and managerial skills training, negotiating skills and has lately been diversified to include also human resources management skills, among others.
- b) Changed monitoring practices were found to have positively influenced compliance with national labor laws and international labour standards (ILS) and generated more confidence among stakeholders. A caution is

⁴¹ Written comment from the Project.

⁴² In-depth interview with Project management staff and TPR USDOL 2015.

made here about better securing the unannounced monitoring visits – and further changes may be required regarding the practice of these visits.

- c) The advisory and trainings services have been diversified to include human resource management systems, which further will be broadened with topics such as impact evaluation, marketing (to generate more revenue) and quality control.

Outcome 3. Better Factories Cambodia has used evidence drawn from its operations to influence change in policy, buyer and factory practices and worker behaviours.

The Project has continuously collected information from its work in factories and with the constituents over the years. The experience and knowledge is used and is (again) accessible for the public after its return to a transparent approach that had been abandoned. Evidence is clearly used to influence buyers, factory practices, and behaviours of both management and workers.

The fact that information on compliance factories is made transparent to the public has no doubt had a positive impact on better practices within factories. The information online is also meant to increase the public's understanding and raise awareness about the issues at hand regarding labor standards and workers' rights, and the need for compliance by factory owners and managers.

Training/advocacy materials are developed to influence practices and behaviours in footwear factories, and research and advocacy is undertaken in the realm of its work. Some delays have occurred. In 2013, BFC started preparing a research study with the Agence Française de Développement (AFD) to assess the impact of improved worker nutrition on their health and productivity. The study has not yet been completed. In 2015 it was reported that the field study results were being analysed but due to a diversity of indicators and some information gaps, the final report has not been completed.

The fact that ILO's Better Work global programme stems from the original project in Cambodia, should also be taken into account here, and is an example of a very successful replication of innovative practices directly influencing labor standards in the industry.

BFC has worked on assessing and remediating child labour cases in factories and the work has led to the fact that a MoU was agreed upon with GMAC. It also led to close consultations with the MoLVT and the establishing of a new *Prakas* (government order on the prevention of hiring/using under aged workers in the factories. The *Prakas* was released/gazetted at the end of 2015.

Conclusion - Outcome 3

BFC has used evidence and information from its long experience in the garment industry to influence buyers, factory practices, and behaviours of both management and workers – and has also been the model (in many of its parts) for the global ILO Better Work Programme – thus its practices have been influential internationally. Some of the research has not yet been completed that could bring out information to be used in advocacy.

Regarding policy influencing, the Project has had an impact on the fact that a MOU with GMAC was agreed upon. It also worked with MoLVT on the content of a new *Prakas*, gazetted in December 2015, regarding the prevention of hiring/using under aged workers in the factories.

Outcome 4. Increase BFC's financial viability as well as national constituents' institutional sustainability, especially that of the Royal Government of Cambodia

It was found that the Project has worked on ensuring key stakeholders' financial support to BFC in different ways, e.g. support from the buyers and donors, and extended MoUs with GMAC and the RGC. BFC and the ministries of labor and commerce visit factories together, especially those that have low compliance and it is also assisting the MoLVT in campaigns promoting OSH.

According to the BFC Project Document the Project should, during the period under review, build management and leadership skills with a view to moving as much as possible to a national management. It should also increase the capacity and ownership of local stakeholders by "strengthening its collaboration with MoLVT, particularly in the area of labour inspection; by promoting robust industrial relations; and by engaging with GMAC to increase their ability to represent employers involved in BFC and to jointly provide technical inputs to apparel factories". While maintaining the goal of the programme the Project should have institutionalised the process it has been engaged in, and sustainability should be achieved through localisation of the services⁴³ and maintaining high quality and also through strengthening the tripartite governance structure.

⁴³ Project Document, p. 28.

It was found that the demand for BFC core services remains strong and it has been able to demonstrate an ability to earn substantial amounts as revenue from rendering advisory and training services and the revenue constitutes 70 percent of the Project's total budget amount – both of which are very good achievements.

The ToR of this final evaluation states that it should place focus on:

“..how willing and prepared Better Factories Cambodia's main constituents and stakeholders are to support the programme to take next steps in transferring to an national, independent institution under a contractual arrangement with the ILO, (to increase their involvement in the delivery of its core services (in line with its long term sustainability strategy) and what methodologies could be used to enhance the financial sustainability of the programme given the limited resources⁴⁴”.

It was found that the goal of institutionalisation has not been achieved and may not be easy to achieve while at the same time striving to have a tripartite governance structure, as advised by ILO. No real strategy has developed during the period under review, however an elaborate plan was developed 5 years ago, which included financial modelling, change management, policy issues, procedures, a financial model, and a proposed legal entity. The two ministries involved with the Project apparently did not endorse this strategy.

A consultant was commissioned in the fourth quarter of 2015 to consult with the key stakeholders regarding their views and plans for a future of the BFC, with an expectation that the result would facilitate the start-up of the process to develop a strategy for the future. It was clear that around six months would be required to develop a new project proposal, based on thorough and genuine consultations with, and participation from the key stakeholders.

An important work component has been seriously delayed. This includes assistance to the MoLVT in its strategic review of the labor inspection system, developing a capacity building and national training action plan, an impact assessment (the latter to enable an annual reporting on labor inspection work). During a discussion in the MoLVT, it became clear that the Ministry is interested in more capacity-building involvement with the BFC, which had been communicated by the Minister to the Director-General (DG) of the ILO. A State Secretary of the MoLVT, who led the discussion with the Evaluator, replied to a question posed by the evaluator concerning the Ministries own plans for the work in the garments/footwear industry. The evaluator was informed that its plans include developing certain services to factories and enterprises working with the Ministry of Economy and Finance to determine the fees (of such services) and with Anti-Corruption Unit - to ensure there is transparency.

In the Evaluator's discussion with the Director General of Trade Service, Ministry of Commerce, the position is that a Working Group (headed by MoC) should be formed to work out cooperation with the BFC (and he would welcome taking on such a role). The key actors to work with improvements in the factories, in achieving higher levels of compliance, should be part of this working group (as the PAC cannot and should not play such a role). Training, albeit not traditional training, should be undertaken for all managers in a future programme. Policy issues, related to compliance, should be in the forefront but also trade. Foreign owners lacking of respect for the Cambodia law should be a concern. He also expressed his wish that GMAC develops a plan for its position and expressed a need for GMAC to build up a middle management capacity.

As for the trade unions, the ministry representatives, as well as GMAC, expressed the need for the Project to ensure that training is provided to union leaders in the future, improving their capacity as leaders and partners in a future social dialogue process.

The evaluation found that the revenue it is able to collect through its services has given the Project actors a certain independence vis-à-vis the regular ILO organisation. It gave the evaluator the impression that the Project is more of a social enterprise - in the sense of an entity applying commercial strategies to maximise improvements in human well-being - or a management training institution, rather than a regular ILO technical cooperation project addressing the interests of all three ILO constituents.

Conclusions - Outcome 4

- a) The Project has ensured financial support to BFC in different ways and has extended MoUs with GMAC and the RCG and shown that it has an ability to earn revenue from its training/advisory services and capacity-building courses with 70 percent of the total budget coming from the services at the time of the evaluation mission. The demand for BFC's services remains strong and national management staff has long experience from working in the Project and have been trained to become future leaders, as expressed by the Project management. These are all very good achievements and important steps in the direction of becoming independent of donor funds in the future and develop sustainable services.

⁴⁴ ToR p. 3. This is one out of three points to be focused on, the others relate to policy and impact.

- b) BFC has not been institutionalised in the sense that it has been referred to in its Project Document. During the period under review no strategy or vision towards institutionalisation had been developed, however in its forth quarter a consultant was commissioned to assess the key stakeholders' views and plans for the future of the BFC.
- c) Working with the MoLVT and MoC is important and should be given due attention as it is closely connected with efforts to keep factories compliant and to generate positive developments in the industry.

Outcome 5. Governance and stakeholder ownership of Better Factories Cambodia has been maintained or improved.

Closely related to the above-mentioned outcome, the evaluation was not able to identify any direct sense, or sign of, ownership of the Project among key stakeholders as foreseen in outcome 5. What was detected, however, is a renewed interest for cooperation with the ILO Project among MoLVT, MoC and GMAC, which apparently stems from the change in the Project management⁴⁵.

Buyers are actively participating in the Project through Buyers' Forums and discussions are also held with individual buyers separately. The buyers in Phnom Penn are invited to participate in the quarterly calls to update buyers outside Cambodia, on matters related to developments in the industry and compliance issues. Staff/representatives who are working for local buyers/brands (Levis, Li & Fung, Adidas) expressed to the Evaluator that they wish to participate in meetings with buyers outside the country – not only in the telephonic discussions that the BFC organises. This was not, however, seen as quite practical by the Project management.

Conclusions: Outcome 5

The evaluation was not able to identify any direct sense, or sign of, ownership of the Project among key stakeholders (as foreseen). What was detected, however, is a renewed interest for cooperation and association with the ILO Project, which apparently stems from last year's change in the Project management (April 2015). Efforts should be made to further intensify this new sense of relationship and consultations, and ensure that PAC meetings are held regularly to increase stakeholders' ownership of the activities and the new Project strategy.

3.6 Reflections on trade unions and their involvement with BFC

There is a myriad of trade unions in Cambodia that for the most part are rather weak and only a few federations can be said to be independent, while others are created in liaison with the Government and some with employers and factory owners.

The evaluator was informed that a new Trade Union Law was in the offing, which would set new rules for forming and dissolving unions - currently under discussion in the National Assembly. The Evaluator enquired about the developments (among others) with the ILO, and the trade union representatives in a focus group discussion, as well as with the two ministries involved and GMAC. It was found that CLC, one of the independent worker federations, was very critical to the law and had together with seventeen other unions had signed a document petitioning against it, handing over the document to the National Assembly's opposition-led human rights commission. Ath Thorn, the leader of CLC stated that its first choice was to have no union law at all. "But now, since the government wants to have it we want to have a good law for the unions and workers", he said.

Some of the other union representatives claimed that the law was a good development. Information from the ILO DWT in Bangkok has revealed that the ILO has provided technical support to tripartite constituents (to ensure that the law complies with the Conventions that have been ratified by Cambodia) as well as formal and informal comments on various drafts. On 28 July 2015, a meeting was organised with the MoLVT, who then confirmed that the issues of threshold requirements has been changed (percentage of workers in a work place that can form a union at local level)⁴⁶.

The trade unions were found to be somehow on the margins of the Project's active engagement, which also the Mid Term Evaluation noted in its report in 2013. It appeared to the evaluator that the Project staff view the buyers, the employers associations and factory owners as (at least) potential agents of change - but to a much lesser extent see the trade unions as a potential force to count on in improving compliance and reach sustainable solutions on workers rights and conditions. This seems to result partly from the design of the Project, and partly from the reality with

⁴⁵ Discussions with MoLVT, MoC, GMAC and focus discussions with individual managers the garment sector.

⁴⁶ According to the International Trade Union Confederation (ITUC), the union law imposes a number of restrictions on trade unions that could "severely curtail workers' rights to union representation, in violation of International Labor Organisation Convention 87 on Freedom of Association ." The ITUC has published its 10 "top concerns" in this matter.

having to deal with a very complicated trade union scenario where, oftentimes, more than one trade union is represented in a factory in which BFC is engaged in⁴⁷.

Trade unions are fairly represented in the PAC, and the PICC's consist of an equal number of workers and management representatives. However, the CTA confirmed that there has not been a specific outreach programme to trade unions in its factory work, for instance, engaging trade unions to undertake any specific tasks to contribute to reaching its goals – as many other ILO projects have done in other countries, e.g. where trade unions have been asked to participate in projects, and where they have undertaken specific tasks to organise educational and/or awareness raising campaigns for union members, or even the general public.

Conclusion - Involvement of trade unions

Trade unions are fairly represented in the PAC, and the PICC's consist of an equal number of workers and management representatives. However, it was confirmed that there has not been a specific outreach programme to trade unions in its factory work and the trade unions seem to play a non-important, or passive role, in the Project implementation.

3.7 Gender issues

Approximately 80 percent of the workforce in the garment factories is made up of women but only 62 percent of the participants in BFCs training courses are women. Women are, in particular, the minority in management training events⁴⁸ - explained by the simple fact that managers for the most part are men.

The Project is given credit for making efforts to pay special attention to gender issues e.g. through collecting sex-disaggregated data and information on beneficiaries. Tools and materials have been adjusted, as well, to be more gender-responsive, for instance addressing gender discrimination in the compliance assessment tools, and inclusion of sexual harassment in training the programme. Women have also been encouraged to attend various training events and outreach initiatives⁴⁹.

However, no specific gender analysis has been developed on which to build a strategy for gender mainstreaming in the programme – and there seems to be no consolidated documentation describing how the Project so far has tackled gender issues (women workers health, sexual harassment and more). Further, none of the documentation of the Project is mentioning that the gender concept is not only about women, but about the roles and needs of women, adolescent girls and girl children; and men, adolescent boys and boy children.

In an interview, the former CTA explained that no specific analysis on gender had been needed since most of the workers in the garments are women, thus everything that is done is done for the benefit of women anyway. The current CTA had a similar position but stated that, indeed, there is a need for ideas to be worked for inclusion in the project.

It was also found that the Project has not helped build capacity of any particular organisation to work specifically on gender issues in relation to the industry. It is surprising that the BFC, after so many years of implementing activities in an industry relying on women workers mostly, has not built any such strong ties with an organisation addressing the needs of workers and on improving their lives.

The BFC claims that it is contributing to *poverty reduction* and *mitigating the vulnerability of female garment workers*⁵⁰. However, information about women workers' lives, their living conditions, and the socio-economic and/or socio-cultural context outside the factory walls that impact on their work, attitudes, motivation and performance as workers seems to be missing in the Project documentation.

The evaluator learnt that the Project will recruit a Junior Professional Officer (JPO) to work on gender issues⁵¹. This is very positive step, as s/he can help the Project to develop a gender strategy or specific gender analysis (which up to now seems to be missing).

These are some findings and reflections that could be considered in the new project proposal:

- Consider what can be done to take a broader perspective, on the support to workers in the industry - the majority of them who are women and many whom are vulnerable and living in poverty. Consider what can

⁴⁷ Source: Discussion with ILO National Programme Coordinator.

⁴⁸ Source: Progress Report to AusAid, 2015.

⁴⁹ Source: Discussions with Project staff and Progress Report to AusAid, 2015.

⁵⁰ Source: BFC Project Document (p. 5).

⁵¹ Source: Discussion with the CTA and Deputy CTA.

be learnt from studies on women workers' lives and living conditions for instance affect their level of willingness and motivation, or lack thereof, to organise themselves.

- Consider what can be done in liaising with other organisations, i.e. civil society such as CARE and/or Marie Stopes, UNWOMEN, UNDP or any local union that can focus on supporting women workers⁵². Perhaps the ILO/the Project could contribute in the planting of a seed for a local organisation, a company, or network, or a women workers resource centre that in the long run could develop into an organisation providing support specifically to garment workers.
- Consider how to use Training of Trainers (TOT) and ILO knowledge to build up capacity of a 2nd generation women union/leaders. How can the ILO Gender Bureau help in providing knowledge and technical assistance? Consider how men can be brought into gender discussions to support equality or to bring light to real issues affecting women and men workers.
- Consider if there are models in other countries to be inspired by – for instance Bangladesh, which has a vibrant NGO sector, and local unions/organisations supporting women garment workers specifically (registered as trade unions) – that received support from the ILO (e.g. the FPRP project).
- Consider if more can be done to increase effectiveness of the Project, for instance in ensuring that the training programmes are adapted to the fact that 80 percent of the production workers in the sector are young women with low levels of education - and who before they became factory workers lived in poverty in rural, and often remote, areas.

Conclusion – Gender issues

b) BFC has undertaken activities that benefit women workers, however there is a lack of gender analysis and gender strategy and no consolidated documentation on what has been done regarding gender (women, girls, men and boys).

b) As more information and data is being generated through various studies about both women, men workers and child labors - there are opportunities for new entry points for BFC in the new programme, to be more engaged and advocate on issues that are relevant in view of gender.

3.8 Project's response to the MTE recommendations

A Mid Term Evaluation (MTE) of the BFC was undertaken in February 2013⁵³. The evaluation report includes nine recommendations, summarised below. This evaluation enquired about what the response by the Project had been to these recommendations, and actions taken⁵⁴.

1. BFC should demonstrate its commitment to tripartism more consistently

Final evaluation's comment: The Project has a Programme Advisory Committee (PAC) consisting of nine members; three representatives from the Royal Government of Cambodia, GMAC and the unions, respectively. There are two co-chairpersons, one is permanent and the other one is alternating⁵⁵. Meeting Minutes from the following meetings were made available to the Evaluator: 13th November 2013; 14 November 2014; 16 February 2015; and 17 June 2015.

As mentioned in this report (section 3.6) the evaluation has assessed that during the period under review, the Project has not seen its commitment toward trade unions as having had high priority⁵⁶. The current Project management has responded to this, in turn, stating that its commitment is as strong as working with GMAC and the government, but more difficult to implement due to the challenges in the trade union environment in Cambodia. The issue was discussed with the CTA, who stated that more efforts needed to be made in the future vis-à-vis the trade unions, i.e. strengthening the cooperation with, and capacity building of, trade unionists and representatives of workers organisations. The relations with the government and GMAC had improved, as already mentioned.

2. BFC should position itself more clearly as user-oriented information programme; a source of high quality, comprehensive, un-biased, easily accessible data on working conditions in the garment industry and beyond.

⁵² A UNDP official, Ms. Seltik Heng, is a former ILO national coordinator of a women's economic empowerment project in Cambodia, who may be an resource person for the Project, regarding gender concerns. Mr. Bill Salter, Consultant and former ILO Director, ROAP, recommended the Evaluator to make contact with her and an initial contact was made. Her e-mail address is: seltik.heng@gmail.com.

⁵³ TPR USDOL (31.07.2013) and the MTE report.

⁵⁴ The evaluator enquired about any written response being available, on how it would follow-up on these recommendations, but was informed that this is not available.

⁵⁵ PAC Meeting Minutes (14.11.2014).

⁵⁶ In-depth interview with former staff.

Final evaluation's comment: The transparency reports, being part of the whole public disclosure, is a very good example and good start – a good response to this recommendation.

3. BFC should move beyond what seems to many (employers, trade unions, independent researchers) to be a narrow and punitive approach to monitoring. The monitoring tool and process should be revised by tripartite constituents and buyers; the monitoring visit should be an entry point for social dialogue on working conditions between all parties concerned (tripartite constituents and buyers).

Final evaluation's comment: The reporting period, has seen an increase in advisory and training services, moving away from a “punitive” approach. Regarding the monitoring visits being entry points for *social dialogue* – this requires positive attitudes and willingness from all parties (as always) and is something the Project needs to consider thoroughly in its up-coming strategy for the new project proposal.

4. BFC training and advisory services need to be framed by a comprehensive strategy with clear targets and indicators which would articulate activities funded from different sources.

Final evaluation's comment: This is a very important recommendation and one that the Project has tried to meet, but much more work needs to be done to develop a comprehensive strategy for the future project.

5. Although in the foreseeable future the monitoring process will continue to be led by BFC this should be accompanied by building capacity of government (and trade unions) partners to collaborate in and eventually to assume this function.

Final evaluation's comment: Again, for the future project - see the whole recommendation, in the report, which is very detailed.

6. There is a need to develop a comprehensive advocacy and information strategy complementary to but distinct from training services, and the BFC should consider launching a web-based survey to ascertain views of various audiences with respect to all information products (monitoring reports, training and advocacy materials) in order to develop products which best respond to user needs and interests in both content and frequency.

Final evaluation's comment: This is a very important recommendation and much more work needs to be done to develop a comprehensive advocacy and information strategy for the future project.

7. BFC needs to engage more constructively with international buyers in factories monitored in recognition of the important influence they have on working conditions.

Final evaluation's comment: This issue was not discussed with the Project staff. The full text in the recommendation says that the Project should collect information about buyers' own auditing and remediation activities. This may not be feasible or desirable..? Through setting up *call-in platforms*, the Project is discussing with buyers regularly regarding factory-level and industry issues. These discussions help define a strategy and leverage buyers' influence to promote improvements. Regarding information on buyers' practices, a buyers' partnership review was conducted by Better Work global programme, which involved information on buyers' practices also being collected from the country programs (including from BFC)⁵⁷.

8. The complementarity of BFC, DWT and Better Work needs to be further defined in order to determine what activities can best be done and by whom at the global, regional or country-specific level.

Final evaluation's comment: This is a very important recommendation and one that needs to be worked on more in the new comprehensive strategy for the future project.

9. More attention should be given to mainstreaming gender equality in the BFC project at policy, institutional and beneficiary levels. The policy framework already exists at the level of the RGC and individual ministries.

Final evaluation's comment: Work has been going on, and results achieved in the area of gender as this report has mentioned (see conclusions), but much more can be done (work in progress) – see recommendations in this report.

3.9 Efficiency

In the very short time of the evaluation field visit in Phnom Penh, a detailed analysis of BFC's income and expenditures was not within the scope of this evaluation.

A discussion with the Project's Finance and Admin Officer, however, revealed that regarding the delivery rate, the Project over the last three years has spent the following from its total budget of USD 6,036,584:

⁵⁷ Source: Written comments from the Project staff.

Year 2013	Year 2014	Year 2015
1,642,828	1,782,907	1,945,084

Thus, a total amount of USD 5,370,819 has been spent at the time of the evaluation.

Approximately 70 percent of the budget is from own revenue, which is assessed as a great achievement and one that the Project will/should use to build sustainable services in the future.

3.10 Impact

It is clear from the above findings that the Project is making an impact. The evaluation has not been able to identify if there was a willingness of the main constituents and stakeholders to create a financially sustainable national, independent institution under a contractual arrangement with the ILO, as mentioned in the ToR.

The Project engaged an external Sr. Consultant during ten days in Cambodia in October 2015, to gather more information and consult with the key partners about the future (the report has not been available for this final evaluation). In January 2016, this evaluation was informed that that the findings from this work shows that this is *not* what the partners currently are looking for, instead they would wish BFC to work much closer with partners so that over time, they can, bit by bit, take over more responsibility.

The development partner (USDOL) expects that the Project could/should be transformed into an NGO – but as such the ILO constituents would probably play a minor role. The ILO, with its constituents, needs to find a viable solution during 2016.

4. Conclusions, Lessons and Recommendations

4.1 Conclusions

The following are the conclusions, stemming from the findings of the evaluation. *It should be noted that not all conclusions have warranted a recommendation.*

Public disclosure program

The return to public disclosure/ transparency approach in 2014 - after eight years of having been abandoned – makes Cambodia perhaps the only large-scale garment producing country to disclose factory-level compliance. It is critical in rebuilding confidence in the country's commitment to improving working conditions in the industry. The Project's actions in restarting this process was strongly opposed by GMAC. It led to a turbulent period for the Project during 2013-2014 with disturbed rapport/working relationships the organisation and the Project but relations had improved at the time of the evaluation field mission.

Project design and strategy

The Project is relevant and even more so after its public disclosure approach took off. Its results framework is basically sound and has a logical construction, and is well followed in the work plan. However, assumptions and strategy are not well worked out (and should be given more attention in the up-coming project proposal).

Relevance

It is concluded that the Project is relevant and even more so after its public disclosure approach took off. Its results framework is basically sound but assumptions and the strategy are not well worked out and need to be given more attention in the up-coming project proposal.

Expansion into new sectors (related to outcome 1)

- a) Compliance in participating factories has improved during the reporting period, most likely to be attributed to the BFC project and the number of low compliance factories has reduced over time since the start of transparency.
- b) The planned expansion to reach footwear-producing factories has yielded modest progress and the work is slow, and the work with the 31 sub-contracting factories to export-licensed garment producers were being monitored at the time of the evaluation in preparation for a workable strategy to be developed. The work has proved to be a challenge.
- c) There has been no indication, or information, that the management arrangements - which had undergone some changes at the time of the evaluation - are not sufficiently effective to run the Project, on the contrary staff expressed that the new management arrangements had helped improve project implementation and relations with the partners.

Compliance with national labor law (related to outcome 2)

- a) BFCs training programme for factories includes topics such as OSH, supervisory and managerial skills training, negotiating skills and has lately been diversified to include also human resources management skills, among others.
- b) Changed monitoring practices were found to have positively influenced compliance with national labor laws and international labour standards (ILS) and generated more confidence among stakeholders. A caution is made here about better securing the unannounced monitoring visits – and further changes may be required regarding the practice of these visits.
- c) The advisory and trainings services have been diversified to include human resource management systems, which further will be broadened with topics such as impact evaluation, marketing (to generate more revenue) and quality control.

Policy advocacy for sustainable improved ILS (related to outcome 3)

BFC has used evidence and information from its long experience in the garment industry to influence buyers, factory practices, and behaviours of both management and workers – and has also been the model (in many of its parts) for the global ILO Better Work Programme – thus its practices have been influential internationally. Some of the research has not yet been completed that could bring out information to be used in advocacy.

Regarding policy influencing, the Project has had an impact on the fact that a MOU with GMAC was agreed upon. It also worked with MoLVT on the content of a new *Prakas*, gazetted in December 2015, regarding the prevention of hiring/using under aged workers in the factories.

Increase BFC's financial viability as well as national constituents' institutional sustainability, especially that of the Royal Government of Cambodia (related to outcome 4)

- a) The Project has ensured financial support to BFC in different ways and has extended MoUs with GMAC and the RCG and shown that it has an ability to earn revenue from its training/advisory services and capacity-building courses with 70 percent of the total budget coming from the services at the time of the evaluation mission. The demand for BFC's services remains strong and national management staff has long experience from working in the Project and have been trained to become future leaders, as expressed by the Project management. These are all very good achievements and important steps in the direction of becoming independent of donor funds in the future and develop sustainable services.
- b) BFC has not been institutionalised in the sense that it has been referred to in its Project Document. During the period under review no strategy or vision towards institutionalisation had been developed, however in its forth quarter a consultant was commissioned to assess the key stakeholders' views and plans for the future of the BFC.
- c) Working with the MoLVT and MoC is important and should be given due attention as it is closely connected with efforts to keep factories compliant and to generate positive developments in the industry.

Working relations with ILO constituents (related to outcome 5)

The evaluation was not able to identify any direct sense, or sign of, ownership of the Project among key stakeholders (as foreseen). What was detected, however, is a renewed interest for cooperation and association with the ILO Project, which apparently stems from last year's change in the Project management (April 2015). This change has seemingly contributed to creating a more positive rapport with the constituents. Efforts should be made to further intensify this new improved relationship and consultations, and ensure that PAC meetings are held regularly to increase stakeholders' ownership of the activities and the new Project strategy.

Trade unions are fairly represented in the PAC but for a variety of reasons they are seemingly on the margin of the Project's active engagement in the garments industry. This situation may affect BFC's long-term viability adversely if not addressed in the forthcoming project.

Gender concerns, integration of gender in the programme

- a) The Project has undertaken activities that benefit women workers, however there is a lack of gender analysis and gender strategy and no *consolidated documentation* on what has been done regarding gender (women, girls, men and boys).
- b) As more information and data is being generated through various studies about both women, men workers and child labors - there are opportunities for new entry points for BFC in the new programme, to be more engaged and advocate on issues that are relevant in view of gender.

Efficiency, impact orientation and likelihood of sustainability

It can be conclude that the Project has been efficient in the sense of spending in relation to its targets and had spent a total amount of USD 5,370,819 at the time of the evaluation - out of the total budget. Approximately 70 percent of the budget is from own revenue, which is assessed as a great achievement and one that the Project will/should use to build sustainable services in the future.

It is clear from the findings in this report that the Project has made an important and positive impact. It has managed to build a very capable national management team and is creating revenue from the services it delivers, as discussed here. The evaluation has not been able to identify any willingness among the main constituents and stakeholders to create a financially sustainable national, independent institution under a contractual arrangement with the ILO, as mentioned in the ToR.

4.2 Lessons

These are three key lessons:

- Project's return to applying more transparency of the export-oriented garment factory assessments is quite effective as it obviously puts pressure on the garment producing factories to be more compliant with international labour standards.

- Efforts to mainstream gender, or to integrate gender concerns in employment-oriented technical cooperation projects, should not be overlooked but be dealt with based on thorough gender analysis and gender planning - even though the ultimate target group may consist of women. This is so because the concept of “gender” is a social construct that involves the needs and roles of women, girls, men and boys and any other gender. And is not equivalent to “women”.
- A Project of this kind and size should have a Monitoring and Evaluation (M&E) post.

4.3 Recommendations

Recommendation 1. Project design and strategy

The Project should, with the help of experts if needed, develop a solid results framework, solid in all its parts including SMART indicators including a solid and realistic strategy building. The strategy must build thorough and transparent consultations with, and participation by the key constituents/partners, as well as civil society organisations.

Recommendation 2. Expansion into new sectors (related to Outcome 1)

The Project should abstain from expanding into new sectors as the garment and the footwear sectors (including their respective sub-contracting firms) are big enough for the resources available and still pose many challenges that are yet to be tackled. It should rather renew its efforts to make more impact in the member factories and among the ones that are notoriously non-compliant.

Recommendation 3. Monitoring practices (related to Outcome 2)

- a) BFC and the key stakeholders should consider that the new Project proposal includes an expert position (with a ToR specifying the responsibilities) of a senior position on Monitoring and Evaluation (M&E) – serving the *whole* project, not only the monitoring aspects in relation to factories⁵⁸. The function should be the “right hand” of the CTA.
- b) The Project should be mindful about making unannounced assessment or monitoring visits really unknown (by the factories) – and consider whether changes need to be made regarding the routines of these visits.

Recommendation 4. Policy advocacy for sustainable improved ILS (related to Outcome 3)

The Project should ensure that research studies that have been started and not completed during the phase are completed and that it is shared with the public. The results of the food and nutrition study for instance – how could it be used in the Project’s policy advocacy vis-à-vis the Government and other stakeholders to the benefit of garment workers?

Recommendation 5. Marketing of high quality services; assistance to MoLVT’s Labor Inspectorate and cooperation with DG, MoC (related to Outcome 4)

- a) In order to ensure long-term viability of benefits and outcomes in the industry, the Project and partners should develop a road map and strategy, in which in particular the rendering of high quality services and marketable pricing are well worked out. This work should be done in close cooperation with the global Better Work programme.
- b) Regarding Project assistance to the MoLVT (of its labor inspection system and for the action plan) the Project and the MoLVT should provide joint guarantees that any future training of its inspectors must be accompanied by regular monitoring of performance, including behaviour and attitude change.
- c) The Project should use the momentum of the interest shown by the DG, MoC, in the discussions and consultations to come about the new proposal and the future as he definitely could play a key leading role from the Government’s side. In view of the, oftentimes, high mobility among government officials, this may be a contact that needs to be made already in the beginning of 2016.

Recommendation 6. Working relations with ILO constituents (related to Outcome 5)

In the efforts to develop a new strategy for the subsequent project phase, ILO and the constituents should be mindful in building on the new momentum for the Project (after a few turbulent years) to further intensify the improved relations. PAC meetings and other regular consultations need to be held regularly throughout the strategy-building process, to increase stakeholders’ ownership and participation. More attention should be given trade unions, and their role, in the up-coming proposal on how to develop activities and sustain and improve activities.

⁵⁸ BFC organigram showing staff positions.

Recommendation 7. Gender concerns and gender mainstreaming in the programme

The Project should ensure that gender issues get a much more prominent role in the new project proposal and that a gender analysis The outcome of the analysis should serve as a benchmark/baseline, and would help the Project staff to design/implement a relevant gender strategy at the very onset with gender responsive activities. The gender strategy should explain how the Project intends to team up with local organisations in its work to support garment workers, many of whom are vulnerable and live in poverty.

Recommendation 8. Sustainability

The Project and the ILO constituents should make all efforts to develop an independent entity in order to sustainably continue its factory assessments, advisory and training functions, and to become stronger on policy advocacy. Whether or not this will be done under *contractual arrangement with the ILO* will obviously depend on the willingness (and possibly the resources) of its constituents. Along with increased quality of services, sustainability must be a top priority for Project in the near future namely how to, at least in the long term, sustain the activities currently performed in a project environment. The process should involve broad and deep consultations with key partners and also partners outside the usual stakeholders framework – for the sake of inspiration and – even from actors outside the country.

Annex I. Terms of Reference

Better Factories Cambodia (BFC) Final Independent Evaluation



Country	Cambodia
ILO Admin Responsibility	Country Office for Thailand, Cambodia and Lao PDR (CO-Bangkok)
Technical field	Social Dialogue and Tripartism (DIALOGUE)/Governance and Tripartism (GOVERNANCE)
Main Stakeholders	Royal Government of Cambodia (RGC) <ul style="list-style-type: none">- Ministry of Commerce- Ministry of Labor and Vocational Training Garment Manufacturers Association in Cambodia (GMAC) Trade unions International buyers and garment factories
Donors	AusAID RGC (Ministry of Labor and Vocational Training) GMAC
XBTC symbol	CMB/13/02/MUL (No. 103987), CMB/12/51/CMB (No. 103754), CMB/12/52/CMB (No. 103755).
Project duration	13 Jan 2013-31 Dec 2015 (36 months)
Total Budget	USD 6,036,584

1. Purpose of Evaluation

This final evaluation was foreseen in BFC's project document, and is in line with ILO Evaluation Unit's guidelines. It is intended to assess achievement on programme objectives as well as identify lessons that can improve the operational effectiveness of the programme going forward.

The BFC contributes to the achievement of the following four (out of total 13) outcomes defined in the 2011-15 Cambodia Decent Work Country Programme:

Outcomes 1.4: National labor standards reviewed, revised or developed in line with relevant international labor standards (under Priority 1: Improving industrial relations and rights at work);

Outcome 2.4: Effective progress made to enhance enterprise productivity and competitiveness (under Priority 2: Promoting an enabling environment for decent employment growth, with focus on young people);

Outcome 3.2: Improved occupational safety and health in the workplace (under Priority 3: Improving and expanding social protection); and

Outcome 3.3: Effective progress made toward the elimination of child labor, especially its worst forms (under Priority 3: Improving and expanding social protection)

2. Background on the BFC project

In 2001, the Cambodian government, in partnership with employers from the textile and clothing industry and the trade unions, developed a unique system for improving working conditions in garment factories, based on social dialogue, stricter observance of labor legislation, and continuous improvements. The International Labour Organization (ILO) was called upon to help set up the system, providing assistance through a project known as "Better Factories Cambodia" (BFC). Its operation began, according to the BFC project document, "after a trade agreement between the Royal Government of Cambodia and the United States gave Cambodian-made garments preferential access to the US market in return for documented improvements in working conditions."

A (mid-term) independent evaluation was conducted on the initial BFC project, from mid-December 2012 to end-March 2013. It was aimed at informing future direction of BFC, among others, while the extended BFC project, BFC II, had begun before the evaluation was finalized.

Better Factories Cambodia II is a 36-month project, which began on 1 January 2013 and ends 31 December 2015 with a total budget of USD 6,036,584. The 3 year strategy is described in a project document and has the following objectives:

Outcome 1. Expand the scale of BFC operations to cover the footwear sector and sub-contract factories in the garment sector.

Outcome 2. Strengthen assessment/monitoring quality and broaden training and advisory service offerings with a view to focusing on impact of interventions.

Outcome 3. Accelerate change and influence stakeholders' behaviours.

Outcome 4. Increase BFC's Financial viability as well as national constituents' institutional sustainability, especially that of the RGC

Outcome 5. Strengthen BFC's governance structure, address national labor issues and create enabling labor environment

3. Evaluation Objectives and Scope

This final evaluation was foreseen in the project document for Better Factories Cambodia Phase II and will be conducted in accordance with the ILO's Evaluation Policy Guidelines. The evaluation will assess the outcome of the project, the effectiveness of related strategies and policies, and their sustainability and impact. Evaluations provide an opportunity for in-depth reflection on the strategy and assumptions guiding the intervention. They assess progress made towards the achievement of the intervention's objectives and may recommend adjustments to its strategy. They are also a means by which to assess how well intervention-level actions link to and support higher level ILO strategies and objectives, as articulated in Decent Work Country Programmes (DWCPs) and the ILO's Programme and Budget (P&B).

The main objective of this evaluation is to assess achievements towards the planned objectives of the project to date according to the log frame and respective monitoring indicators, and make recommendations on how to design the interventions that will form the basis of Phase III.

The main objectives of the present evaluation are:

- To provide account to the donors, national and international stakeholders in regard to the results achieved by BFC to date
- To analyse the achievements made and to identify lessons learned in order to improve and guide the future operations of the BFC project vis-à-vis the changing garment industry, changing socio-economic and business environment and the new technical operating environment e.g. the scheduled alignment with the Better Work Programme. This will be achieved by assessing the relevance and coherence of the BFC design, strategy and approach, the efficiency in implementation, effectiveness of its operations, sustainability of results and the impact of the project.
- To provide recommendations for the future direction of BFC
- To identify lessons learned from BFC strategies, policies and operations to be transferred and integrated where applicable in the operations of the ILO/IFC Better Work Programme, as well as the ILO as a whole.

The scope of this project evaluation includes all elements of the original Better Factories Cambodia project log frame. The evaluation should however integrate gender equality as a cross-cutting concern throughout its methodology and all deliverables, including the final report.

The evaluation should particularly focus on:

1. Stakeholder engagement and sustainability: an evaluation of how willing and prepared Better Factories Cambodia's main constituents and stakeholders are to support the programme to take next steps in transferring to an national, independent institution under a contractual arrangement with the ILO, (to

increase their involvement in the delivery of its core services (in line with its long term sustainability strategy) and what methodologies could be used to enhance the financial sustainability of the programme given the limited resources.

2. Influencing compliance and policy: (a) understanding how stakeholders view the programme's influence, on both industry compliance and wider policymaking in the area of decent work; and (b) understanding how lessons learned from the programme can be more effectively levered to accelerate change, including through collaboration with ILO on policy advocacy.
3. Impact of the programme: evaluate the impact of activities that BFC has implemented at factory and sectoral level beyond monitoring and assess if these activities have supported positive changes. This includes worker outreach programmes, public reporting and the delivery of training and advisory services.

The primary audience of the report is Better Work project management – both the BFC country project and Better Work Global, the ILO office (ILO Country Office for Thailand, Cambodia and Lao People's Democratic Republic), as well as the project and global programme donors (USDOL, SECO, Australia and the Netherlands.) The secondary audience includes national project partners and stakeholders, and international buyers.

It is envisioned that the assignment will require a maximum of 30 work days over a period of two months, including travel to Cambodia.

4. Evaluation Criteria and Questions

A. Relevance, strategic fit and validity

1. Does the project design (i.e. priorities, outcomes, outputs and activities) address the stakeholder needs that were identified?
2. Do the objectives and activities of the project correspond to the government strategies, priorities and policies (social constraints, sectoral development contexts, economic integration, etc.)?
3. Is there any demand for project activities and/or objectives that are currently not covered by the project?
4. How appropriate and useful are the indicators described in the project document in assessing the project's progress? Are the targeted indicator values realistic and can they be tracked? If necessary, how should they be modified to be more useful? Are indicators gender sensitive? Are the means of verification for the indicators appropriate
5. What, if any, alternative strategies would have been more effective in achieving its objectives?
6. What are the views of stakeholders on the project with respect to its relevance, strategic fit and validity?
7. Is the project aligned with national gender-related goals?
8. Was a gender analysis included during the initial needs assessment of the project?

B. Effectiveness

1. Is the project on track to complete all project activities according to schedule? If not, what measures/adjustments were implemented or what could have been done otherwise, to maximize the effective use of resources?
2. Has the nature of social dialogue in the participating factories in the project changed as a result of the implementation of the project advisory activities? To which extent? What are the (remaining) challenges?
3. Has the program met the performance targets it established annually?
4. How have stakeholders been involved in project implementation? How effective has the project been in establishing national ownership? Is the project management and implementation participatory and is this participation contributing towards the achievement of the project objectives? Has the project been appropriately responsive to the needs of the national constituents and partners?
5. If applicable, has the project been appropriately responsive to political, legal, economic, and institutional changes in the national environment?
6. Did the project achieve its gender-related objectives? What kind of progress was made, what were the obstacles?

C. Efficiency

1. Have resources been allocated strategically to achieve outcomes?

2. Is financial sustainability a key element of the project strategy? How is this reflected? What are the challenges? What is the pricing strategy? Is it still relevant? Does it need to be reviewed? What is the progress towards the cost recovery plan?
3. Does the program have an effective financial system in place?
4. What efforts have been made to improve time and resource efficiency in the delivery of core services?

D. Effectiveness of management arrangements

1. Are management capacities adequate?
2. Does project management facilitate good results and efficient delivery? Is there a clear understanding of roles and responsibilities by all parties involved?
3. Does the project receive adequate political, technical and administrative support from the ILO and its national implementing partners?
4. How effective is communication between the project team, the ILO and the national partners?
5. How effectively does the project management monitor performance and results?

E. Sustainability

1. Have project staff widened and diversified their skillsets both in terms of core service delivery and in supporting wider project activities.
2. Does the project involve tripartite constituents in the implementation of the project to increase their involvement and enhance ownership of project results, as per the sustainability plan?
3. What modalities could be used to enhance the ownership and sustainability of final products? How will the project services be institutionalised and what is the exit strategy?
4. What are the possible long-term effects of the project on gender equality? Are any gender-related outcomes likely to be sustainable?

F. Impact

1. Is the global M&E framework effectively used to measure the outcomes and impact of BFC?
2. What impact of the programme can be documented to date on working conditions in the workplace, worker wellbeing, firm performance, policy changes and/or buyer behaviour?
3. From the buyer's perspective, how effective has BFC been in driving factory level compliance, compared with third party audit companies?

5. Methodology

The evaluation will be carried out in adherence with the ILO Evaluation Framework and Strategy, the [ILO evaluation policy guidelines](#), the UN System Evaluation Norms and Standards and the OECD/DAC Evaluation Quality Standards.

The evaluation is expected to use a mixed methodological approach consisting of the following stages:

- **Desk review of documents:** project document, technical progress reports, M&E indicators, workplans, mission reports, minutes, impact assessment baseline report, Cambodia DWCP 2011-15, other relevant national and provincial development plans, other key documents produced by the project etc.

The desk review will suggest a number of initial findings that in turn may point to additional or fine-tuned evaluation questions. This will guide the final evaluation instrument which should be finalized in consultation with the evaluation manager. The evaluation team will review the documents before conducting any interview.

- **Field work in Cambodia:**
 - Interview with Chief Technical Adviser (CTA)
 - Interview with National Coordinator
 - Individual and group interviews with BFC team (focused on strategies, lessons learned and challenges)
 - Key informant interviews with members of the PAC, as well as selected government officials, representatives from employers' and workers' organisations

- Interviews with factory owners, and
- Interviews with workers (as final recipients of the programme)
- Donors present in the field
- **Key informant interviews** (remote – by phone and/or Skype) with:
 - selected BWG staff and ILO officials (Director and relevant Programme Officers)
 - selected international buyers actively sourcing from Cambodia, as needed
 - BFC donors
- **Briefing session with preliminary findings**

6. Main Deliverables

Deliverable 1: Inception report (Please refer to [Checklist 3](#))

Deliverable 2: Visual and oral presentation of preliminary findings

Deliverable 3: Draft evaluation report

Deliverable 4: Final evaluation report

The evaluation report in draft form and in English should be presented to BWG and BFC for circulation within two weeks after the finalization of the field mission. The length of the report should not exceed 20 pages (excluding annexes). The report will be assessed against [ILO Evaluation Policy Guidance and checklists](#). Specific attention should be paid to [Checklist 4](#), [Checklist 5](#) and [Checklist 6](#).

The contents of the final report are listed below:

- Title page
- Table of contents
- Executive summary
- Acronyms
- Background and project description
- Purpose of evaluation
- Evaluation methodology and evaluation questions
- Project status and findings
- Conclusions and recommendations
- Recommendations for a Revised Logframe
- [Lessons learnt](#) and [emerging good practices](#)
- List all recommendations
- Annexes

This report will be circulated by BFC to ILO Country Office and relevant stakeholders for their comments. (Phases 5 and 6 in the provisional work plan below). The evaluators should consider the comments for the preparation of the final version of the report.

7. Management arrangements, workplan and timeframe

The assignment will be managed by an Evaluation Manager. The evaluator will report to the evaluation manager and should discuss any technical, methodological or organisational matters with the evaluation manager. In-country management and logistics support will be provided by the CTA of the project and the BFC team as a whole.

Annex II. Evaluation instrument

The evaluation objectives are (below) translated into relevant and specific evaluation key questions - the evaluation instrument - to inform the development of the methodology. They are *examples* of questions to be posed to the ILO staff and to relevant constituents/stakeholders, i.e. government agencies, employers/factory owners and managers, and workers organisations/trade unions and, if feasible, UN organisations or programmes based in Phnom Penh.

In relation to the below-mentioned questions, will also be of concern “Has the BFC Project been doing things in the right way to ensure that outcomes/objectives are met?” and “Could there have been better ways of achieving results?”

Evaluation questions in relation to the evaluation criteria

Please note that these questions will be further detailed and “tailor-made” to each category of stakeholder/partner once the full data gathering is under way:

Relevance, strategic fit and validity

Relevance is here understood as relating to the extent to which the Project’s activities are in line with the priorities and policies of the country/stakeholders and (direct, indirect, ultimate) beneficiaries, as well as the ILO itself and the development partners (donor agency).

- What was the basis on which the BFC project was designed? Was any initial needs assessment, diagnostic study, or baseline study undertaken prior to, or at the start of the Project? Has any gender analysis been carried out?
- How are the objectives and activities of the Project aligned with the relevant national policies, strategies, priorities? In view of the majority of workers in the garments industry being women, how is the project aligned with national gender plans and goals, and the Cambodia’s DWCP?
- What is the relevance and coherence of the BFC project design, strategy and approach?
- What is the validity and SMART-ness of the design of the Project, i.e. how does the project design (i.e. priorities, outcomes, outputs and activities) address stakeholders’ needs? How were they identified at the onset, or before the start-up, of the Project?
- How appropriate and useful are the indicators in the project document’s Logical Framework Analysis (LFA) in measuring achievements? How are indicators used in monitoring project performance/achievements system, implementation plans, and TPRs?
- What demands (if any) for project activities and/or objectives currently not covered by the project are expressed by the stakeholder categories, including the Government?
- What are the views of stakeholders on the project with respect to its relevance, strategic fit and validity?

Effectiveness

Effectiveness is here understood as relating to the extent to which activity/strategies reach or contribute to meeting the stated objectives.

Effectiveness in implementation and reaching goals/objectives:

- (If applicable) How has the Project responded to political, legal, economic and institutional changes in the national environment?

- How effective has the Project been to appropriately respond to the needs of the national constituents and partners?
- How has the Project managed to respond to the conclusions, and act on the recommendations made by the Mid Term Evaluation?
- How effective has BFC Project been in reaching/contributing to the five objectives and the stated outputs and in reaching the annual performance targets? What were the major factors influencing the achievement or non-achievement of the objectives and outputs?
- From the buyer's perspective, how effective has BFC been in driving factory level compliance, compared with third party audit companies?
- How have stakeholders been involved in project implementation – what is the level of participation of the stakeholders? How effective has the project been in establishing national ownership?
- What changes have occurred (if any) related to social dialogue in the participating factories? What can be said about the extent of the Project's contribution (in terms of e.g. advisory activities) to such changes? What are the (remaining) challenges?
- How has the Project dealt with issues of gender equality, gender mainstreaming? What kind of progress was made, and what were the obstacles?
- Has any external factors impacted (positively or negatively) on the results and reaching the Project's overall objective/s?

Effectiveness of management arrangements:

- To what level are management capacities adequate (focus is on facilitating results and efficient delivery) and how effectively does the project management monitor performance and results?
- To what extent are roles and responsibilities well understood by all parties involved (including project staff and the stakeholders)?
- How effective has ILO's technical/admin support been provided to the Project?
- How effective is communication between the project team, the ILO and the national partners?

Efficiency

Efficiency is here understood as a measurement of the outputs (qualitative and quantitative) in relation to the inputs. It is applied to assess/determine whether the least costly resources possible were used to reach the intended results.

- How has financial sustainability been addressed in the project's strategy? What are the challenges? Does it need to be reviewed? What is the progress towards the cost recovery plan?
- Have resources been allocated strategically to achieve outcomes? Could resources have been used in alternative, more efficient ways? What is the current rate of budget delivery and commitments?
- Does the program have an effective financial system in place?
- What efforts have been made to improve time and resource efficiency in the delivery of core services?

Impact orientation and likelihood of sustainability

Impact is here understood as concerning itself with the positive and negative changes produced by the Project directly or indirectly, intended or unintended. This involves the main impacts and effects resulting from the activity on the local social, economic, environmental and other development indicators. The examination must also include the positive and negative impact of external factors, such as changes in terms of policy, trade and financial conditions.

- What has happened as a result of the Project, i.e. what impact of the programme can be documented to date on working conditions in the workplace, worker wellbeing, firm performance, policy changes and/or buyer behaviour?
- What real difference has the Project made to the (direct/indirect/ultimate) beneficiaries?
- How many people (and who) have been involved/affected in the Project's interventions/activities (in particular in capacity-building and skills development activities)?
- To what extent has the global M&E framework effectively used to measure the outcomes and impact of BFC?

Sustainability is here understood as concerned with measuring whether the benefits of an activity are likely to continue after donor funding has been withdrawn. Projects need to be environmentally as well as financially sustainable.

- To what extent is it likely that the benefits of the BFC project will continue after donor funding ceased?
- What are the major factors that may influence the achievement or non-achievement of sustainability of the BFC Project?
- Have project staff widened and diversified their skillsets both in terms of core service delivery and in supporting wider project activities?
- What mechanisms, interventions or other activities could be undertaken to enhance the ownership and sustainability of the Project's final "product"? How will the Project services be institutionalised and has time and resources been allocated for carrying out an exit strategy - and communicating about it, or involving the stakeholders in this strategy?
- What are the possible long-term effects of the Project on gender equality? Are any gender-related outcomes likely to be sustainable?

Methodology and steps in the evaluation process

The evaluator will use qualitative methods to gather both qualitative and quantitative data and information. The latter will be drawn from secondary sources as there is no scope/time to undertake a survey to gather quantitative data.

Generally, it is important for the evaluation to appreciate the logic of the design of the Project, and thus the Results Framework, or Logical Framework Analysis (LFA) will be examined. If any changes have been made to the initial framework the reasons and validity of this will be accounted for. Methodological triangulation will be applied, involving more than one option to gather data, i.e. interviews, observations, brief written questions to selected respondents, and documents. Emphasis on triangulation is not only done to increase the credibility and validity of the results, and cross-check information to minimise any bias – but also to deepen the evaluator's understanding.

The below "figure" gives examples of the sources and methods that will be applied to gather information in relation to each evaluation criteria:

- Figure 2. Sources & methods for data collection to apply the key evaluation criteria

Key evaluation criteria	Documents/sources of information & data	Method to be used
1 Relevance & strategic fit	National policy documents, UN reports (incl. DWCP), action plans, Project document w. LFA, TPRs, info from staff & stakeholders, MoUs.	Doc. review, in-depth interviews & meetings with all ILO constituent categories.
2 Effectiveness	Project document, TPRs & any M&E reports, reports on capacity building/training; Mid-MTE report, info from staff & stakeholders.	Doc. review, in-depth interviews with ILO staff and DPs & other stakeholders; and donor agency. Collection of qualitative & quantitative information, data. <i>If feasible</i> : FGD with factory related staff (managers/mid managers, staff reps, workers if possible).
3 Efficiency	TPRs, work plans, budget and expenditure documents, donor reports, financial reports/documents & info from Finance/Admin project staff.	Doc. review, Interview,
4 Impact and sustainability	MTE report, TPRs, M&E reports, info from manufacturers/buyers/factory reps/unions/Gov't.	Doc review, discussions & meetings, in-depth interviews, e-mail correspondence.

Comprehensive documentation review

The evaluator will study the overall context in which the Project is operating. At the time of starting the field programme in Cambodia, a number of documents had been received, however, several were still to be passed on to the evaluator (see Annex II) by ILO HQs and the Project management. The documentation review will be undertaken throughout the evaluation field mission, as more documents will be gathered in Cambodia.

Field visit to Cambodia 12-20 November 2015 to gather data/information and making observations:

Interviews/groups discussions/meetings:

ILO staff: In-depth interviews will be done with the project CTA and National Programme Coordinator addressing in particular the project strategies, lessons learned and challenges, as well as other project staff members and, if possible, the predecessor to the CTA. Interviews will also be scheduled with BWC factory monitoring staff – the selection to be made in consultation with the CTA. Interviews will also be carried out with non-project ILO officials in Phnom Penh and - and some ILO officials in Bangkok, of the Better Work programme staff.

ILO constituents and social partners: Interviews and consultations will be scheduled with members in the PAC, i.e. representatives of Ministry of Labor and Vocational Training, Ministry of Commerce, GMAC (the Employers Association), trade union representatives. Discussions will be held with focus groups, e.g. buyers and factory owners, and managers/mid-managers.

Development Partners: The donor agency USDOL will be approached and it is expected that a skype talk will be arranged with the relevant USDOL official in Washington, and if possible a representative of the US Embassy. Other UN representatives may also be consulted (e.g. UNDP,

UNWOMEN) and/or WB representatives. Discussions in groups are likely to be the method of collecting information with Government officials, as well as the other constituents.

As this is the final evaluation of an ILO project, the evaluator requested that the mission would last for 10 days but for various reasons the mission will last only 8 days in Cambodia (and only 7 days available for appointments). It would be highly appreciated if efforts are made to enable the evaluator pay visits to some garment factories involved in the BFC programme, both well-performing factories (high compliance) and poorly performing factories (low compliance). The selection could thus take into account factories that have: i) carried out self-monitoring, ii) benefitted from BFC's advisory services ii) factories that perform well, and iii) do not perform well, or comply with the set standards. Apart from interviews/discussion in factories, the evaluator will also make observations.

A mix of in-depth informant interviews and consultations of approximately one hour and group discussions/meetings will be carried out with constituents/stakeholders. Consultations will be carried out via Skype (including with ILO officials in Bangkok and Geneva)

E-mail correspondence and (possibly) a brief set of written questions

E-mail exchanges are also likely to be used to gather more information and to enrich the triangulation and validation process. The feasibility of using a short list of questions (approximately 5-6 key questions only) will be discussed within ILO and if appropriate/feasible this will be used mainly to have more detailed information from relevant ILO staff to supplement other methods.

Validation meeting

At the end of the data collection phase, preferably on 20th November, the evaluator will present preliminary findings (only) through a PPT (the participants of the meeting, venue and length will be discussed with the project management). At least ½ day need to be set aside for preparing for this presentation.

Conclusions and recommendation will be included in the evaluation report. This will be a valuable opportunity through which the participants will be encouraged to express and share their views/information/data on the progress and provide feedback for consideration in the report.

Reporting

This inception report is submitted on 13th November, followed by a draft report by mid December and final report by the end of December. The latter will be a full report with findings, conclusions, recommendations, lessons learned and all annexes, and include an Executive Summary. It shall address/incorporate written comments from ILO and constituents. It is imperative that these written comments are sent to the evaluator as a consolidated set of comments in good time to produce the final report.

Ethical considerations

The evaluator will be mindful of ethical standards in the analysis of gathered data and in the reporting. Observations, triangulation/cross-checking of information will be applied as much as possible to increase the credibility and validity of the results and, to the extent possible, minimise any bias.

The evaluation will comply with ILO and UN norms and standards, and the evaluator will duly consider ethical standards and code of conduct as spelled out in UNEG's ethical Guidelines for UN evaluations. Adherence will be made to the standards for instance in the gathering of information in order to protect those involved in the evaluation process. Thus, confidentiality of the beneficiaries will be respected and in the circumstances surrounding e.g. field visits at work places and in interviews.

The evaluator will be guided by the ILO Policy Guidelines for Results-based Evaluation: principles, rationale, planning and managing for evaluations (2013) and ILO Guidance Note No.4: Integrating Gender Equality in Monitoring and Evaluation of Projects (March 2014).

Annex III. Preliminary findings 20th Nov 2015 Phnom Penh

The below is the text used in the PPT presentation of the final evaluation of the Better Factories Cambodia II (BFC) project, at the BFC project office in Phnom Penh, on 20th November 2015.

Key facts

- BFC contributes to 4 outcomes of 13 Cambodia DWCP 2011-15 and works under/with/linked to Global Better Work programme.
- This phase started in Jan 2013 – ends in December 2015.
- Total no of project staff: 37 in total
- Donors: USDOL, RGC and GMAC.
- Donor & budget: RGC, GMAC, USDOL. Budget: USD 6,036,584 (in 2013, funds from Australia/AusAid).
- Project duration: Jan 2013 – ends in December 2015.
- Implementation areas: Export garment factories in Phnom Penh (mainly)
- Project staff: 37 in total, about 75% involved in factory outreach. Two expatriate posts were filled in 2015; the CTA post in April, and the Technical Specialist post in May. Changes (since then) in management team & responsibilities/division of tasks (e.g. advisory & training now headed by two mgs instead of one). One additional (female) management recently recruited.
- Key partners: GMAC, the Ministry of Labor and Vocational Training, Ministry of Commerce and Workers/trade unions.
- Agreements with project partners: BFC has one MoU with RGC and GMAC; and an Agreement with GMAC on “Child labor protection”.
- Other partners/stakeholders: Ultimate target group (workers, mainly women); Private sector: Buyers, consultants making technical inputs (through external collaborator contracts) to the Project.

Evaluation – main objectives

- Accounting to donor/s, national & international stakeholders in regard to the results achieved by BFC to date
- Achievements & lessons learned – for future BFC - including what could be replicated/taken up by Global BW
- Recommendations (future direction of BFC)
- Focus: Engagement of stakeholders, sustainability to influencing compliance, policy & impact of the programme
- Scope: (period) 2013-2015 (36 months).
- Categories: All key client/stakeholder groups (ILO tripartite constituents/Partners, ILO project management & staff at the HQ and country office, project staff & donor agency).

Consulted/interviewed/had Focus Group Discussions (FGD) with the following:

(Methods/approach to be described in detail in the report)

- ILO National Programme Coordinator/JPO

- BFC Project staff
- GMAC – Employers in Garments.
- Factory managers, compliance officers, admin, union leaders/factory workers
- Buyer reps
- Ministry of Labor and Vocational Training & Ministry of Commerce
- UNDP (Policy & Analysis)
- Donor (USDOL) in Washington DC

Former BFC CTA, ILO Better Work management staff (BKK/Geneva), international consultants still to be interviewed. Will contact more project staff on e-mail (HER's project, sex harassment etc), and BFC NO newly appointed on post.

Relevance

Examples of questions e. relevance:

- How are the objectives and activities of the Project aligned with the relevant national policies, strategies, priorities?
- What is the relevance and coherence of the BFC project design, strategy and approach?
- What is the validity and SMART-ness of the design of the Project, i.e. how does the project design (i.e. priorities, outcomes, outputs and activities) address stakeholders' needs? How were they identified at the onset, or before the start-up, of the Project?
- How appropriate and useful are the indicators in the project document's Logical Framework Analysis (LFA) in measuring achievements?
- What are the views of stakeholders on the project with respect to its relevance, strategic fit and validity?

Effectiveness

Very briefly – this is about: “What progress/results has the project made towards achieving its outcomes (objectives)- including producing the stated outputs?” It includes effectiveness of implementation and management arrangements.

Efficiency

- Have the allocated resources (funds, expertise) been appropriate (adequate) to date?
- What is the level of “budget delivery” to date?
- Could alternative approaches have been applied to better achieve the results?

Potential impact & sustainability

- What is the likelihood that the strategies and activities of Project will become sustained (national independent entity?)
- What are the factors/circumstances that would contribute to durable changes and results?
- Generation of incomes through services – How can it be used to build long-term sustainability of services in the garments?
- Project design, plans, reporting, PAC

- Validity of Project design 2013-15: Logframe basically sound & clear. (Logframe not existing during JT “era”).
- Work plan (USDOL) 2013-15: Well conceived, follows the Logframe’s logic, very ambitious!
- Bi-annual reporting to donor (TPRs) not reporting against outputs (only outcomes) – so cannot follow output reach. WPs give hints on progress. Donor not asking for more detailed reporting.
- PAC meets quarterly; PAC has an advisory role.

Policy context

- Socio-economic context and growth of the Garments industry (to be developed in the report).
- Strikes related to Minimum wage negotiations (2014) and violent clashes and unrest (2013-2014).
- New trade union law likely to be enacted “soon”. Independent union (CLC) up in arms but has not see the law text. ILO has provided and will continue to provide TA to constituents (to comply w Conventions ratified by Cambodia). 28 July in meeting MoLVT said it had modified threshold requirements (% workers to set up union local level).
- Has ILO insisted on wide consultations? Does BFC have the draft? How may it affect BFC’s operations – if any? GMAC, RGC accuse trade union of being corrupt, are hopeful there will be fewer trade unions, talking about putting some TU people behind bars.

Some preliminary findings

- The scope of the implementation is very ambitious – but work is completed or ongoing in the majority of the activities/outputs (only a few have been cancelled).
- Staff: Dedicated, dynamic management staff. Young work force working with outreach in factories. Staff training seems to be a recurring component.
- Total No. registered (active) garment & footwear factories involved in BFC: 554 factories (538,855 workers). Out of these 74 factories get advisory/training services.
- Total External Collaborator contracts during the reporting period: Total Service contracts:....(to be reported on in the draft report).

Response/actions following the Mid Term Evaluation in 2013?

- The vast majority of the recommendations of the MTR have been acted on, however the Evaluator has not been able to identify/find and documented on this. The Project staff did not know how this had been responded to.

Some preliminary findings

BFC project has spent:

Year 2013	Year 2014	Year 2015
1,642,828	1,782,907	1,945,084

Positions of the key stakeholders regarding the future of BFC

MoLVT: “cooperation has improved” – says it was not good earlier. Wishes to have closer cooperation with BFC in a number of ways. Is critical to Project’s IGA (high costs). MoLVT is developing certain services to factories and enterprises in cooperation with Ministry of Economy and Finance to determine the fees (of such services) and with Anti-Corruption Unit to ensure transparency; and develop capacity for their LI to improve efficiency – that would be paid for.

- Ministry of Commerce:

Interested in having a working group headed by MoC involving all key stakeholders – as PAC cannot and should not have this function. Training for all (not traditional training) in the areas of change management, problem solving, CSR, communication & regulatory framework, policy issues related to compliance and trade in addition to the Labor Law and IR.

- GMAC: Did not express any views on plan or vision. Three members expressed dissatisfaction about the Project's approach and results.
- The donor (USDOL) has expressed its interest/concern about need for building capacity of unions and sustainability – in terms of creating a institution (NGO, company, association) - not in terms of incorporating services and sustain in the existing ILO constituents.
- Factory managers: Good that project pays attention to workers for better compliance and gives workers a voice to the mgt. Role of PIIC should be to push for changes and solve problems. Training on OSC, safety etc should be free of charge - we are already members..! ILO adviser should visit factories more often.
- Buyer representatives stated need for improvement of assessment quality and standardised advisory services and capacity of IR in all factories not only the adviser factories.

About the independence/neutrality and accountability of the Project: There is a difference in views among key stakeholders.

Several of those who have participated in the evaluation have expressed the need for the Project to transfer knowledge about the Cambodian Labor Law and some have pointed out the need to work more on changing mind sets and build understanding of what industrial relations stands for. Different actors have different interpretations (e.g. stated by Buyer and GMAC reps).

All stakeholders seemed to view the move from only conducting monitoring and assessment to include also advisory and training services as being very important. There is a difference in views among key stakeholders on its quality, how it should be delivered and have opinions about the pricing of services.

Some reflections on gender/women workers

Women workers are the ultimate (indirect TG) and the project states it is aiming at poverty reduction.

- Women workers' lives, living conditions socio-economic, socio-cultural context outside the factory walls is missing in the Project.
- Gender analysis/gender planning/strategy needs to be documented in a consolidated way – project has done work related to gender/women workers (health, sexual harassment etc).
- Consider how to use Training of Trainers (TOT) and ILO knowledge to build up capacity of 2nd generation women union/leaders.

Supporting women garment workers through Civil Society (saw the seeds to a Women Workers' Resource Centre?)

The BFC should, after so many years, now have built some capacity among civil society organisations. There is a need to supplement trade unions, identify/sub-contract local organisations/institutions to take on role to support women workers and build knowledge (in various aspects, including harassment, child care, leadership etc.).

Next steps in the evaluation process?

- Write and submit a draft evaluation report to the Evaluation Manager (EM), Geneva

- Get written feedback/comments on report from Project team & selected stakeholders – consolidated by the EM
- Write and submit a draft final report, get comments and produce a FINAL report.

Annex IV. Documents consulted

- *Project Document (2013-2015)* of Better Factories Cambodia Project, International Labour Organization
- Memorandum of Understanding (MoU) between Royal Government of Cambodia, Garment Manufacturers Association in Cambodia and International Labour Organization on I10 Better Factories Cambodia Programme, Signed 18 December, 2013
- Memorandum of Understanding (MoU) on Child Labour Protection.
- PAC minutes (37th BFC Project Advisory Committee (PAC) Meeting dated 13th November 2013; 40th BFC PAC, Minutes dated 14 November 2014; 41st PAC meeting minutes, dated 16 February 2015; 42nd PAC meeting minutes, dated 17 June 2015).
- *Garment Industry 32nd Compliance Synthesis Report*, Produced in June 2015, BFC. Reporting period: May 2014 – April 2015, Number of factory assessments in this report: 393 Country: Cambodia Work Plans.
- Press Release For immediate release, Wednesday 8 July, 2015
- *Better Factories Cambodia Transparency Database report, 5th cycle* (<http://betterfactories.org/transparency/pages/view/17>)
- A PPT Transparency Report (latest figures)
- *Mid Term Evaluation report*, Better Factories Cambodia Project, ILO
- *ILO, IFC join to promote "better work" in global supply chains*: An interview with Ros Harvey, ILO and IFC Better Work Global Programme Manager, September 2007 (source: http://www.ilo.org/global/about-the-ilo/newsroom/features/WCMS_084048/lang--en/index.htm)
- *GMAC advises members on new policy for BFC Monitoring*, GMAC Advertisement 30 September 2013, an Article in Phnom Penh News, October 1, 2013
- *INTERWOVEN, How the Better Work Program Improves Job and Life Quality in the Apparel Sector*, World Bank Group, 2015
- *Prakas on Determination of Minimum Wage for Workers/Employees in the Textile, Garment and Footwear Industries for 2015*, Ministry of Labor and Vocational Training, No. 283 KB/Br.K
- *Monitoring in the Dark, an Evaluation of the International Labour Organization's Better Work Factories Cambodia Monitoring and Reporting program*, February 2013, by International Human Rights and Conflict Resolution Clinic Stanford Law School & Worker Rights Consortium (source: <http://humanrightsclinic.law.stanford.edu/project/monitoring-in-the-dark/>)
- Decent Work Country Programme Cambodia (2011-2015)
- Performance and Monitoring Plans (PMP) (USDOL): 31.01.2015, FY Q1 31.01.2014; FY Q1 31.07.2014; 31.07.2015.
- 7 BFC Work Plans (USDOL)
- 10 BFC Technical Progress Reports (for US Department of Labor)
- 1 BFC Technical Progress Reports (AusAid)
- List of Country Programme Outcomes (CPOs) as registered in the ILO's ERP system (IRIS)
- Various guidelines and materials produced by the BFC Project.

- ILO EVAL Guideline for Inception Reports, ILO Policy Guidelines for Results-based Evaluation: principles, rationale, planning and managing for evaluations (2013) and ILO Guidance Note No.4: Integrating Gender Equality in Monitoring and Evaluation of Projects (March 2014).
- *Cambodia Competitiveness and Linkages in Cambodia's Manufacturing Sector*, A Discussion Paper, UNDP Cambodia, 2014
- *Activists call for delay of controversial union law*, 17 November 2015 Mom Kunthear, article in Phnom Penh Post (<http://www.phnompenhpost.com/national/activists-call-delay-controversial-union-law>):
- *Combining Global and Local Forces: The Case of Labor Rights in Cambodia*, by Sandra Polaski, <http://carnegieendowment.org/files/WDCambodia1.pdf>. This article originally appeared in the May 2006 (Vol. 34, No. 5) issue of World Development.
- *“Best practice” in the Regulation of International Labor Standards: Lessons of the U.S. - Cambodia textile agreement*, by Don Wells.
- 10 Top Concerns with the November 2015 Trade Union Law, 30 November 2015, International Trade Union Confederation (ITUC)

Annex V. Persons consulted

ILO (regular staff, project staff, former staff), development partner/s, and consultants

Name	Position/Organisation
Tun Sophorn,	National Coordinator, ILO Phnom Penh
John Ritchotte	Specialist on Labour Administration and Labour Relations, ILO DWT, Bangkok
Tara Rangarajan	BW global programme, <i>(evaluator has communicated on e-mail, sent written questions on e-mail on 16th December 2015).</i>
Esther Germans	Chief Technical Adviser (CTA) BFC
Camilla Roman	Technical Specialist, BFC
Dara Nov	Training Manager, BFC
Narith Nang	Senior Enterprise Assessor, BFC
Sopha Chea	Assistant/Advisor Co. Manager, BFC
Ly Sokheng	Communications Assistant, BFC
Sok Heng Ros	Finance and Admin, BFC
Ana Aslan	Better Work Global Coordinator, US Department of Labor, Washington
Bill Salter	Consultant
Jill Tucker	Former Chief Technical Adviser
Kiros Beyene	UNDP office Phnom Penh
Seltic Heng	UNDP office Phnom Penh

Constituents/Key stakeholders including beneficiaries

Name	Position
H.E. Mam Vannak	Secretary of State, Ministry of Labor and Vocational Training
H.E. Seng Sakada	Director General for Labor, Ministry of Labor and Vocational Training
Ouk Chanthou	Director of Labor Inspection Department, Ministry of Labor and Vocational Training (MoLVT)
Leng Tong	Director of Department of Occupational Safety and Health, Ministry of Labor and Vocational Training (MoLVT)
H.E. Sok Sopheak	Director General of Trade Service, Ministry of Commerce

Name	Position
Raymond Tan	Executive Member, Garment Manufacturers Association in Cambodia
Ken Loo	Secretary General, Garment Manufacturers Association in Cambodia
Mr. Som Chamnan	Head of Legal and Labor Division, Garment Manufacturers Association in Cambodia (GMAC)
Mr. Cheat Khemara	Senior Labor Officer, Garment Manufacturers Association in Cambodia (GMAC)
Ath Thorn	President, Cambodia Labor Confederation (CLC)
Ms. Tep Kimvannary	President, Cambodian Federation Independent Trade Union (CFITU)
Soy Seyha	Secretary, CCTU
Mr. Roith Minea	Secretary General, National Independent Federation Textile Union of Cambodia (NITUC)
Mr. Nuon Chantha	Secretary General, National Union Alliance Chamber of Cambodia (NACC)
Mr. Yoeun Chhun	President, Cambodian National of Confederation (CNC)
Ms. Yang Sophorn	President, Cambodian Confederation of Unions (CCU)
Women factory workers	Workers in factories participating in the BFC (in-depth interviews)

Annex VI. Field programme in Cambodia (November - 2015)

Friday 13th November 2015:

- + Esther Germans, CTA, BFC
- + Camilla Roman, Technical Specialist, BFC
- + Ken Loo, Micky and Jonh Cha, GMAC
- + Tun Sophorn, ILO-JPO

Sunday 15th November:

- + Discussion with women factory workers (in factories participating in BFC project)

Monday 16th November:

- + Factory visit with Narith Nang, BFC
- + Camilla Roman, Technical Specialist, BFC
- + Meeting with H.E Mam Vannak, Secretary of State , Doctor Leng Tong, Director of Department of Occupational Safety and Health and Mr. Ouk Chanthou, Director of Labor Inspection Department, MOLVT
- + Meet with Sophal Chea Assessor /Advisor Manager, and Nov Dara, Training Manager

Tuesday 17th November:

- + Esther Germans, CTA BFC
- + Meeting with Union (Mr. Roith Minea, Secretary General of National Independent Federaton Textile Union of Cambodia (NITUC), Ms. Tep Kimvannary President of Cambodian Federation Independent Trade Union (CFITU) and Mr. Ath thon , President of Cambodia Labor Confederation (CLC), and Soy Seyha, Secretary, CCTU.
- + Interview with Dara Nov, Training Manager, BFC

Wednesday 18th November:

- + H.E Sok Sopheak , Director General of Trade Service
- + UNDP meet with Mr. Kiros Beyene, Policy and Advocacy
- + Meeting with Mr. Ros Sokheng
- + Discusion with Narith

Thursday 19th November:

- + Focus discussion, Factory managers
- + Focus discussion with Buyer representatives, Primark, Ms. Yim Pichmalika, Ms. Yun Sokha from Levis, Mr. Pove from Li & Fung, Ms. Laong (Adidas)

Friday 20th November:

- ✚ Meeting with CTA and members of the management team presentation of preliminary findings

23rd November:

- ✚ Bill Salter, Skype in-depth interview

30th November:

- ✚ Jill Tucker, Skype in-depth interview

7th December:

- ✚ Wamiq Umaria, discussion at ILO HQs, Geneva
- ✚ Yoshie Ichinohe, discussion at ILO HQs, Geneva
- ✚ Tara Rangarajan, global BW programme (*e-mail correspondence, I sent her written questions on 16th December 2015, response not received yet*).

P5-Chief Technical Adviser
Esther GERMANS

nnex VII. Project organisation

P3-Technical Specialist
Ms Camilla ROMAN (TC)

Assessor and Advisor Unit

Finance & Admin Unit

Training Unit

**NO-B Asst/Advisor Co.
Manager**
Mr Sophal CHEA

NO-B Team leader advisory
Ditine Kang

**NO-A Senior Enterprise
Assessor**
Mr Narith NANG (TC)

**NO-A Finance & Admin.
Manager**
Mr. Sok Heng ROS (TC)

**NO-B Training
Manager**
Mr Dara NOV (TC)

GS-6 CoM
Mr Sokheng LY
(TC)

GS-7 Enterprise Assessor
Mr Vina AM (TC)

**NO-A Enterprise
Ass/Advisor**
Ms Vouthy HENG (TC)

GS-7 Enterprise Assessor
Mr. Siv Sothea (TC)

GS-4 Finance Assistant
Ms Kolina KEO (TC)

**NO-A Training
Officer/Advisor**
Sovanthyda Tan (TC)

GS-7 Enterprise Assessor
Mr Sam Ol Ork (TC)

**NO-A Enterprise
Ass/Advisor**
Ms Nary HENG (TC)

GS-7 Enterprise Assessor
Ms. Thon Tyna (TC)

GS-4 IT Assistant
Ms Minea Lirana HAS
(TC)

**NO-A Training
Officer/Advisor**
Ms Sokunthea SENG (TC)

GS-7 Enterprise Assessor
Mr Vuthy CHOUR (TC)

**NO-A Enterprise
Ass/Advisor**
Mr. Kuyhang HENG

GS-7 Enterprise Assessor
Ms. KHUT
Chhornsocheata (TC)

GS-4 Admin. Assistant
Sotheany LAY (TC)

**NO-A Training
Officer/Advisor**
Mr Boran TEANG (TC)

GS-7 Enterprise Assessor
Mr Ty CHENG(TC)

**NO-A Enterprise
Ass/Advisor**
Ms Sokha Chov (TC)

GS-7 Enterprise Assessor
Mr Hong Lay You (TC)

GS-3 Admin. Secretary
Ms. Lida Phan(TC)

**NO-A Training
Officer/Advisor**
Vichhra MOUYLY (TC)

GS-7 Enterprise Assessor
Mr Ying BUN (TC)

**NO-A Enterprise
Ass/Advisor**
Ms Chaosen Arunvattey

GS-7 Enterprise Assessor
Mr Visehd Koy(TC)

**GS-4 Data Mngt. &
Admin. Assistant**
Ms Vimol LIM (TC)

**NO-A Training
Officer/Advisor**
Nou Pheary(TC)

GS-7 Enterprise Assessor
Ms Kunthea HIN (TC)

**NO-A Enterprise
Ass/advisor**
Ms Chan Sopheaktra
CHHAY (TC)

GS-7 Enterprise Assessor
Vacancy ?? (TC)

GS-2 Receptionist
Vacancy (TC)

GS-4 Training Assistant
Ms Rida Thy (TC)

GS-3 Driver
Mr Savath HEM (TC)

Annex VIII. Time line for the evaluation



