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Integrated Programme on Fair Recruitment (FAIR) Phase III – Independent Final Evaluation

QUICK FACTS

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BACKGROUND & CONTEXT

Summary of the project purpose, logic and structure

The Integrated Programme on Fair Recruitment (FAIR) Phase III is a technical assistance programme with a total budget of USD 4,223,424, funded by the Swiss Agency for Development and Cooperation (SDC), the Italian Ministry of Foreign Affairs and International Cooperation, the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), and the Friedrich-Ebert-Stiftung (FES) Foundation. It is jointly implemented by the Fundamental Principles and Rights at Work (FUNDAMENTALS) Branch and the Labour Migration (MIGRANT) Branch of the International Labour Organization (ILO).

By promoting fair recruitment practices the programme sought to uphold fundamental principles and rights at work (FPRW) and improve migration outcomes in intervention countries and corridors as well as support the global efforts of the ILO's Fair Recruitment Initiative (FRI). Conceptually, the programme was structured around four pillars: 1) Generating global knowledge and policy guidance, 2) Enhancing policy and enforcement, 3) Promoting fair business practices, and 4) Empowering migrant workers. Phase III's design and implementation were built on a strong foundation of technical expertise and lessons learned from programme phases I and II. Geographically, Phase III focused on both global-level activities as well as country-level interventions in Côte d'Ivoire, Ghana, and Tunisia and to a lesser extent, Lesotho.

Present situation of the project

Phase III was launched in August 2022 and is scheduled to conclude in February 2026. There are no additional phases planned for this Programme.

Purpose, scope and clients of the evaluation

This final evaluation serves to assess the programme's achievement of both intended and unintended outcomes and, to the extent possible, draw conclusions about its overall effect on the state of recruitment and labor migration in intervention countries. The evaluation assesses the phase III's performance across all four pillars and broadly reviews the added value of the programme's long-term engagement in Tunisia through all three programme phases.

Methodology of evaluation

This evaluation was conducted between November 2025 and February 2026. The methodology employed a mixed-methods approach, utilizing the OECD/DAC evaluation criteria (relevance, validity of design and coherence, effectiveness, efficiency, and impact and sustainability) applied across 23 evaluation questions. Data collection included an extensive desk review of programme documents; key informant interviews (KIIs) with 35 respondents consisting of ILO staff, donors, government officials, workers' and employers'

organizations, and civil society partners; and one focus group discussion with journalism students who participated in the programme.

MAIN FINDINGS & CONCLUSIONS

The main findings and conclusions of the evaluation are grouped below according to OECD/DAC evaluation criteria.

RELEVANCE

The FAIR programme essentially functioned as the operational arm of the FRI by promoting, operationalizing, and testing global standards for fair recruitment, particularly the General Principles and Operational Guidelines (GP&OG) and the Definition of Recruitment Fees and Related Costs. These seminal documents set out the policy direction and global standards for fair recruitment. Both are grounded in international labour standards, negotiated by a tripartite group of experts, and adopted by the ILO's Governing Body, which in turn indicates the programme's relevance to the needs of tripartite stakeholders at the global level.

The programme was also relevant and well aligned with ILO's Programme and Budget (P&B) for 2024-25. From a broad thematic perspective, FAIR III encapsulates several components across the ILO's programming areas as labor migration and fair recruitment are both cross cutting issues associated with the wider Decent Work agenda. More specifically, FAIR III was aligned with P&B Outcome areas one "strong, modernized normative action for social justice" and six "Protection at work for all".

The programme's design was structured around the four pillars noted earlier, mirroring the FRI's strategy. Together, the objectives outlined in the four pillars form a comprehensive and relevant framework that addresses the core mandates of the ILO and the diverse priorities of its global constituents. This provided the programme with sufficient strategic direction to maintain a clear and dedicated approach to supporting key stakeholders across the four pillars, yet enough flexibility to tailor activities and approaches to fit country-specific contexts.

VALIDITY OF DESIGN AND COHERENCE

Programme design was largely valid and coherent. The four pillars served as a framework for structuring the programme's theory of change as well as outcomes and outputs in the logframe. The ToC was generally well reasoned with sound underlying logic; though a more comprehensive set of underlying

assumptions could have led to a more accurate reflection of real world contexts and in turn tempered expectations for programme performance, particularly regarding the incentives of private recruitment agencies (PRA) to implement fair recruitment principles. Overall, the logframe was logically structured with outputs, outcomes, and related indicators capturing many of the programme's results. At the same time, the logframe could have benefited by adding more indicators addressing knowledge retention and behaviour change, especially for training and capacity building initiatives.

Underpinning the programme's overall design was the use of its signature 'corridor approach'. The evaluation found that this approach was most effective when there was a strong programmatic footprint in both sending and receiving countries. This was most evident along the Cote d'Ivoire - Tunisia corridor, where effective collaboration and the establishment of agreements between union federations in both countries enhanced support and information provision to migrant workers.

The coherence and validity of FAIR III's design was also enhanced by applying lessons learned from previous phases of the programme. Most notably, the design of Phase III emphasized a strong link between on-the-ground programming and the production of global knowledge products. The programme served as a testing ground to validate, refine, and contextualize global research, resources, and tools to promote fair recruitment. Prominent examples include the Roadmap for Safe Migration and the Media Toolkit on Reporting Forced Labour and Fair Recruitment. FAIR III also improved from previous phases by better integrating gender considerations into design and programming.

EFFECTIVENESS

The programme implemented a wide array of activities and initiatives over a vast and contextually diverse operational environment. This led to variation in results across pillars, with strong performance seen under pillar one and relatively weaker performance under pillar three, while pillars two and four had mixed results across country contexts.

Pillar 1 Generating global knowledge and policy guidance: Pillar one is the programme's strongest area of performance, having generated a vast body of research, resources, and tools to promote fair recruitment. On-the ground programme operations were used to test, refine, and contextualize these knowledge products. The programme disseminated these knowledge products through Fair Recruitment Knowledge Hub as well as various

trainings, forums, and workshops. This evaluation found the Knowledge Hub to be more comprehensive than any other online resource regarding fair recruitment, making it an authoritative source on the subject. While the website itself is well structured and appears to be regularly updated, site traffick was modest, suggesting that more could be done in future programming to actively drive users to the site.

Pillar 2 Enhancing Policy and Enforcement: The programme's support in the development of a National Fair Recruitment Roadmap in Ghana and a National Migration Strategy in Côte d'Ivoire has put the regulatory landscape for fair recruitment on a positive trajectory in both countries; though, anticipated legal reforms have yet to occur and are needed for these strategy documents to reach their full potential. As such, it will be essential to coordinate with fair recruitment partners in these countries to maintain momentum on legal reforms and ensure that the activities identified in these strategy documents move forward after the programme concludes. In Côte d'Ivoire, the programme also played a significant role supporting the public employment service, Agence Emploi Jeunes (AEJ), to step into its role as the state regulator of the recruitment industry. Compliance across the industry remains weak at this nascent stage, but the institutionalization of this role puts the recruitment industry on a path towards greater compliance. In the case of Tunisia, legal reforms were not possible given its existing political climate. This led the programme to pivot to providing technical support for administrative reforms and building the capacity of the newly developed inspectorate for recruitment agencies. These activities demonstrated that real gains can be made in regulatory compliance even when legal reforms are off the table.

Pillar 3 Promoting fair business practices: The programme supported formalization of the recruitment industry in all three countries, particularly in Côte d'Ivoire where it aided in the establishment of an umbrella association for recruitment agencies. This provides a framework for self-regulation and accountability where none previously existed. The programme also supported PRAs across all three countries with training on fair recruitment principles, and provided them with tools and resources aligned with the GP&OG. Despite these initiatives, pillar three is relatively the weakest area of performance. The recruitment sector in all three countries (particularly in Côte d'Ivoire and Ghana) still experiences a high level of informality and it is likely that only limited to moderate improvements in the business practices have been achieved among some PRAs. Respondents from PRAs described

this issue not as a case of divergent views or a belief that fair recruitment was not important, but rather pragmatic constraints regarding resources and the significant time and effort required to significantly change their business operations.

Pillar 4 Empowering Migrant Workers: The programme addressed this objective through three primary channels; the establishment and continued operational support of migrant resource centres (MRC), awareness raising campaigns among migration hotspot communities, and supporting the Recruitment Advisor Platform. Through the use of these mechanisms, the programme has enhanced information provision and support services to migrants; however, website analytics data on the Recruitment Advisor platform suggest that its use by potential migrants remains limited, particularly in Phase III intervention countries. In future programming, other platforms or mediums for information provision may prove more appropriate. Lastly, it was not possible to determine if the programme's awareness raising campaigns effected migration-related outcomes or led to changes in deeply entrenched cultural norms regarding gender and migration, as programme monitoring did not capture this information.

EFFICIENCY

This evaluation assessed programme efficiency through its distribution and use of technical, human, and financial resources.

Technical Resources: The programme utilized technical resources in an efficient manner, leveraging ILO's in-house technical expertise across a variety of disciplines to inform activities. The programme also facilitated South-South knowledge sharing to increase the efficiency and cost effectiveness of capacity building activities.

Financial Resources: FAIR III activities were financed through four separate financial awards from its respective donors under one project code through what is known as a multi-donor fund (MUL). This is in addition to funding for staff positions under the ILO's programme budget. Utilizing this funding structure allowed for more funds to be channeled through the FAIR programming, resulting in a consolidated and unified approach to promoting FAIR recruitment. At the same time, it also led to several limitations in also let to a significant administrative burden on the programme team as well as uncertainty about the availability and timing of funds. These issues could partially be mitigated in future programming by minor administrative reforms

by ILO HQ as well as familiarizing donors with MUL requirements well in advance of anticipated funding.

The allocation of funding across intervention countries was influenced by not only be strategic objectives but also donor funding conditionality, which reduced operational flexibility and drove some programmatic decisions rather than strategic considerations. The most notable example is the inclusion of programming along the South Africa-Lesotho corridor, which did not significantly contribute to the programme's strategic objectives.

Human Resources: The programme had sufficient staffing at the headquarters level with a full time Programme Manager from the FUNDAMENTALS Branch and a half-time Programme Officer from the MIGRANT Branch. At the country level, the programme had three National Project Coordinators (NPC); one in Ghana, Tunisia, and Côte d'Ivoire respectively. Respondents in each country viewed this as the minimum level of staffing required to accomplish programme objectives. In addition, the programme could have benefited from a dedicated MEL Officer. This may have pre-empted the inconsistencies in the ToC and logframe noted earlier, and allowed the programme to effectively measure long-term outcomes.

IMPACT AND SUSTAINABILITY

This evaluation identified 16 results (9 under FAIR I & II and 7 under FAIR III) where evidence suggests a likelihood of continued impact and sustainability. Eight of these results exhibited a high likelihood for sustained impact, seven exhibited a moderate likelihood, and one exhibited a low likelihood. The results with the highest likelihood of sustained impact were those which were codified in new legislation or in the operational guidelines and regulations of government actors or social partners. A prominent example from Phase III is the adoption of "Guidelines for the protection of migrant workers' rights" by the UGTT and changes to its regulations, which allowed its affiliates to recognize migrants under a special membership status. Similarly, embedding elements of the Media Toolkit in the journalism curricula of higher education institutions in Ghana, Tunisia, and Côte d'Ivoire was perceived as having a high likelihood of sustained impact. Migrant resource centres that were developed under Phase II were also deemed to have a high likelihood of sustained impact. Other donors chose to fund MRCs outside of the programme, highlighting their broad relevance and appeal. Furthermore, the fact that the MRCs were established and operated by union federations, bodes well for their long-term sustainability after the programme exists.

This evaluation also found a strong link between programme duration and sustainability. The ILO started conducting fair recruitment activities in Tunisia 10 years ago (first under the REFRAME project, followed by subsequent phases of the FAIR Programme). This long-term engagement resulted in a shift in stakeholder mindsets, the building of institutional trust necessary for effective administrative reform, and the programme's ability to navigate a volatile political landscape. These achievements will likely have sustained effects and it is improbable that they could have been fully realized through short-term engagement. Conversely, short implementation windows in Côte d'Ivoire and Ghana negatively impacted the sustainability of outcomes. There was a general consensus from respondents in both countries that the programme had garnered significant buy-in and support from key stakeholders, but solidifying programme outcomes would require further engagement. In particular, respondents stressed that further support was needed to fully implement the activities in the National Migration Strategy in Côte d'Ivoire and the National Fair Recruitment Roadmap in Ghana.

RECOMMENDATIONS, LESSONS LEARNED AND GOOD PRACTICES

Main Recommendations

High Priority Recommendations:

R1 FAIR III Programme: Identify relevant handover partners for ongoing programme activities and establish transition plans complete with timelines, cost estimates, and potential funding sources. The development of these transition plans should be an iterative process with relevant partner organizations.

R2 For FRI/future ILO fair recruitment programmes: Redesign activities with private recruitment agencies to provide them with more tailored, hands on technical support to integrate fair recruitment principles into their business practices. This should be accompanied by appropriate monitoring mechanisms to measure the extent to which business practices change over time.

R3 For ILO HQ: When implementing a multi-donor fund (MUL), the ILO should assign focal points from the Donor Relations Department and Budget Department (BUD DC) at the programme level, not the award level. Doing so would lead to a more unified approach to both budget management and donor engagement, allowing ILO to more effectively manage the complexity of MULs, better address donor reporting needs, and mitigate some operational constraints. Relatedly, allocate more time prior to programme

implementation to familiarize donors with the benefits and limitations of MULs, and where possible, work with them to remove restrictions that prevent the pooling of funding under a single, unified programme budget.

R4 Donors and all implementers in migration and recruitment programming: Plan programmes as long-term processes, not short interventions. Future programmes should be funded and designed from the start as multi-phase processes, with clear continuation pathways and exit strategies, ensuring vital initiatives survive beyond the life of the programme.

Medium Priority Recommendations:

R5 For FRI/future ILO fair recruitment programmes: Concentrate future programming in migration corridors where a strong programmatic footprint is possible in both sending and receiving countries and the respective governments in those countries are receptive and supportive of programming. Transit countries should also be considered where relevant.

R6 For FRI/future ILO fair recruitment programmes: Establish indicators for high-level outputs and outcomes that capture behaviour and systems change rather than participation, particularly for training and capacity building initiatives. Consider hiring a dedicated MEL officer to ensure appropriate indicators and monitoring systems are in place.

R7 For FRI/future ILO fair recruitment programmes: Maximize existing investments in knowledge generation by raising awareness about the Fair Recruitment Knowledge Hub among key stakeholders, particularly those based in the global South.

R8 For FRI/future ILO fair recruitment programmes: Consider ways to better leverage the Recruitment Advisor platform or consider alternative avenues for providing information to migrants. Efforts should be taken to raise awareness of the platform among migrant communities, and user studies should be conducted to ensure the platform's design is user friendly and presents information in a manner that migrants find useful and easily accessible.

R9 For FRI/future ILO fair recruitment programmes: Sustain and expand investments in journalism training. Creating follow-up pathways such as internships and mentorship programmes for journalism students would support the long-term development of a tight-knit cadre of skilled journalists that can accurately report on safe recruitment and forced labor issues.

Consider establishing stronger ties with media outlets to not only strengthen and expand this network but also promote the publication and wider dissemination of materials produced by its members.

R10 For FRI/future ILO fair recruitment programmes: Any future programming in Côte d'Ivoire should support relevant counterparts in the Ivorian government to strengthen permanent regulatory and oversight mechanisms, and thereby promote the further formalization of the recruitment sector and improve compliance with fair recruitment principles.

Lessons Learned:

LL1: Institutional, administrative, and operational reforms can deliver sustainable results in sensitive contexts when legal reforms are not feasible. This is best supported through a long-term programmatic presence that builds tripartite trust.

LL2: Embedding fair recruitment initiatives within existing national systems enhances ownership. In Côte d'Ivoire, FAIR III deliberately embedded its interventions, such as the development of the National Fair Recruitment Roadmap, labour migration policy review, labour law reform inputs, and capacity building for public employment services, within existing government structures, tripartite technical working groups, and statutory processes.

LL3: Although multi-donor funds (MUL) allow for more comprehensive and better resourced programmes, they can also create onerous administrative reporting requirements on programme teams and negatively impact programme timelines and operational flexibility. Some of these effects can be mitigated if ILO assigns reporting focal points differently.

Good Practices:

GP1: Positioned the PES in Côte d'Ivoire as a credible gatekeeper for fair and regulated international labour migration. Doing so directly contributed to FAIR III's objective of strengthening institutional frameworks for fair recruitment and is a sustainable long-term path to reduce reliance on informal intermediaries.

GP2: In Tunisia, Ghana, and Côte d'Ivoire FAIR III strategically engaged media practitioners and journalism students by adapting the ILO global media toolkit on fair recruitment and forced labour to the national context and integrating it into the curricula of journalism schools. The practice directly supported

FAIR III objectives related to improving migrant access to reliable information and strengthening fair recruitment awareness.

GP3: FAIR III operationalised the corridor approach not only at policy level, but also technically by aligning tools, concepts, and institutional practices between countries of origin and destination (particularly for Côte d'Ivoire–Tunisia). This included shared terminology, compatible compliance expectations and coordinated roles for unions and authorities on both sides of the corridor.

GP4: Rather than creating parallel project-based services, FAIR III embedded fair recruitment information, referral pathways, and case identification tools within trade unions' MRCs. In Tunisia, this included standard referral sheets, coordination with legal aid providers, and basic case categorisation related to recruitment abuses.