

► **FINAL INTERNAL EVALUATION REPORT**
**Advancing Fundamental
Principles and Rights at Work on
Forced Labour and Child Labour
in Malaysia (MYS/23/01/CAN)**

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► Acronyms

Acronym	
ACTEMP	ILO Bureau for Employers' Activities
ACTRAV	ILO Bureau for Workers' Activities
ADVANCE Project	Project on Advancing Fundamental Principles and Rights at Work (FPRW) on Forced Labour and Child Labour in Malaysia
CL	Child Labour
CSOs	Civil Society Organizations
DWT	Decent Work Team
DWCP	Decent Work Country Programme
E&E	Electrical and Electronics
ESDC	Employment and Social Development Canada
ESG	Environmental, Social and Governance Standards
FAA	Finance and Administrative Assistant
FL	Forced Labour
FPRW	Fundamental Principles and Rights at Work
ILS	International Labour Standards
ILO	International Labour Organization
LABADMIN/OSH	ILO Labour Administration, Labour Inspection, and Occupational Safety and Health Department
MEF	Malaysian Employers Federation
MITI	Ministry of Investment, Trade and Industry
MOHR	Ministry of Human Resources
MTUC	Malaysian Trades Union Congress
NAPBHR	National Action Plan on Business and Human Rights
NAPFL	National Action Plan on Forced Labour
NAPTIP	National Action Plan on Trafficking in Persons
NPC	National Project Coordinator
NSS	National Semiconductor Strategy
RBA	Responsible Business Alliance
RVC Project	ILO Responsible Value Chain Project
SMEs	Small and Medium-Sized Enterprises
UNCT	United Nations Country Team

► Executive Summary

Project Overview

The project “Advancing Fundamental Principles and Rights at Work (FPRW) on Forced Labour and Child Labour in Malaysia (ADVANCE)” (MYS/23/01/CAN) was implemented by the International Labour Organization (ILO) with funding from the Employment and Social Development Canada (ESDC) from 20 March 2023¹ to 31 March 2026, with a total revised budget of USD 603,678.01. The project was implemented with a particular focus on the electrical and electronics (E&E) sector, and engaged key national stakeholders including the Ministry of Human Resources (MOHR), labour inspectorates, the Malaysian Employers Federation (MEF), the Malaysian Trades Union Congress (MTUC), and other partners.

The project aimed to strengthen compliance with FPRW, particularly on forced labour (FL) and child labour (CL), through four interconnected outcomes:

- Outcome 1: By 2026, laws and policies to address FL and CL take into consideration specific vulnerabilities and needs of at-risk population and are gender- and age responsive.
- Outcome 2: By 2026, enforcement of forced and child labour laws is strengthened, and victims’ rights are protected.
- Outcome 3: By 2026, the public is sensitized about forced and child labour laws.
- Outcome 4: By 2026, freedom of association and the right to collective bargaining of women and men, local and migrant workers, in the E&E sector in Malaysia are enhanced and contribute to addressing forced labour and child labour.²

Purpose and Scope of the Evaluation

This final internal evaluation was conducted for accountability and learning purposes, assessing the project’s performance against OECD-DAC criteria: relevance, coherence, effectiveness, efficiency, impact orientation, and sustainability. It also examined cross-cutting issues, including gender equality, social dialogue, international labour standards (ILS), and environmental sustainability. The evaluation covered the full implementation period and all outcomes, with a focus on identifying lessons learned and informing future ILO programming.

Methodology

The evaluation applied a mixed-methods approach, including desk review of project documents, reports, and national frameworks and key informant interviews (KIIs) with ILO staff and a worker organization representative, and separate focus group discussions with MOHR, MEF and MTUC. The findings were validated with the stakeholders through a workshop on 11 May 2026 .

Key Findings

The project’s main achievement was building stronger policy, institutional and stakeholder foundations for longer-term action on FL and CL in Malaysia. During the final reporting period, the project completed all planned outputs under the approved revised workplan, including the draft National Action Plan on Forced Labour (NAPFL) 2026–2030, the updated labour inspector training guide and training, the NAPFL communication strategy and implementation plan, ESG modules for employers, and the trade union

¹ ILO PARDEV Project Approval Minute Sheet, 04 April 2023.

² Project factsheet.

capacity-building package and workshop. Under Outcome 1, the project influenced national policy reform by generating studies and recommendations that informed the draft NAPFL 2026–2030 and helped align forced labour and child labour actions across key national frameworks, including NAPFL, National Action Plan on Trafficking in Persons (NAPTIP) and National Action Plan on Business and Human Rights (NAPBHR). Under Outcome 2, it contributed to labour inspector capacity and victim protection through an updated facilitator's guide, online training and a victim-support services assessment, although deeper operational support and follow-up remain needed. Under Outcome 3, the project moved beyond general awareness-raising by completing the NAPFL communication strategy and implementation plan with MOHR ownership, and by supporting the institutionalization of ESG modules through MEF Academy. Under Outcome 4, it strengthened trade union knowledge and practical tools on labour rights, freedom of association, collective bargaining and inclusive organizing, with greater attention to migrant workers, women and youth.

Relevance & Coherence

Rating: High (See **Annex 1** for rating scale used.)

The project has strong alignment with national priorities including the NAPFL, NAPBHR, labour law reforms, Decent Work Country Programme (DWCP) priorities and broader economic strategies. Its focus on the E&E sector was relevant given the sector's importance in global supply chains and exposure to forced labour risks. The design was coherent in linking policy reform, enforcement, awareness, employer engagement and worker representation. However, some assumptions on the pace of institutional change and sector engagement were too optimistic. The project was adaptive in making use of inception phase to address limited consultation during design phase, and in making necessary scope adjustments during implementation phase.

Effectiveness

Rating: Moderate-High

The project achieved strong policy influence through the draft NAPFL 2026–2030, contributed inputs to NAPBHR, NAPFL communication strategy and implementation plan, supported labour inspector training, institutionalized ESG modules through MEF Academy, and delivered trade union training and tools. Results were strongest at the level of policy influence, institutional products and stakeholder capacity-building. However, several outputs remain at an early stage of uptake, and operational follow-through was weaker in areas requiring sustained resources and data sharing, such as labour inspection, public reporting mechanisms, employer course uptake and institutionalization of union policies.

Efficiency

Rating: Moderate

The project used limited resources efficiently through partnerships, cost-sharing and collaboration across ILO projects. The Technical Officer, National Project Coordinator (NPC) and Finance and Administrative Assistant (FAA) played important roles in sustaining delivery, technical quality, coordination and reporting under constrained conditions. However, lean staffing, late onboarding of some roles, high administrative demands and reliance on shared technical support created trade-offs. These affected the depth of implementation, monitoring, follow-up with partners and office-wide coordination functions, including UN Country Team (UNCT) engagement.

Impact Orientation

Rating: Moderate-High

There are clear early signs of systemic change. The project contributed to important enabling conditions for longer-term change, including policy integration, improved stakeholder dialogue, stronger compliance awareness and institutional tools for government, employers and workers. However, measurable impact on

the reduction of forced labour and child labour cannot be assessed, as there is no available or accessible national statistical data on FL/CL prevalence or reduction. This reinforces the need for stronger national data and monitoring systems.

Sustainability

Rating: **Moderate**

The project achieved stronger sustainability where outputs are embedded in national or institutional processes, including the draft NAPFL 2026–2030, the NAPFL communication strategy and implementation plan, MEF Academy's ESG courses, the labour inspector facilitator's guide, and trade union training and campaign tools. However, sustainability remains uncertain where continued uptake depends on partner resources, follow-up support, formal adoption, trainer availability, and institutional capacity to operationalize the tools beyond the project period.

Cross-cutting issues

Rating: **Moderate**

The project integrated gender equality, non-discrimination, social dialogue and international labour standards most clearly at the level of implementation processes, stakeholder engagement and training content. It gave attention to migrant workers, women, youth and other vulnerable groups, particularly in the NAPFL process and support to trade unions. However, the depth of cross-cutting results varied across components, and environmental sustainability was only partially integrated, mainly through ESG-related activities.

Key Lessons Learned

- ▶ Alignment with broader frameworks such as the DWCP, NAPFL and NAPBHR strengthens stakeholder ownership, relevance and scalability;
- ▶ Integration into national systems and partner-owner platforms enhances sustainability and uptake;
- ▶ System-based approaches are more effective than one-off activities;
- ▶ Policy support requires clear implementation pathways, resources and operational follow-up;
- ▶ Efficiency gains require balance with adequate technical and human capacity;
- ▶ Stakeholder engagement and framing are critical to securing buy-in;
- ▶ Policy achievements require clear operational follow-through;
- ▶ Short project timelines limit institutionalization and impact; and
- ▶ Awareness alone does not ensure uptake without incentives and follow-up.

Recommendations

Key recommendations include:

Strategic

- ▶ Adopt longer-term, programmatic approaches aligned with the DWCP;
- ▶ Strengthen integration between policy development support and policy implementation pathways;
- ▶ Align future project design, implementation and reporting with evolving donor strategic frameworks, including supply-chain resilience priorities, while maintaining coherence with ILO and national priorities;
- ▶ Embed sustainability in staffing models balancing technical quality, national ownership, and resource allocation.

Programmatic

- ▶ Strengthen in-country technical capacity and institutionalized capacity-building;
- ▶ Enhance adaptive management and monitoring systems;
- ▶ Improve stakeholder engagement and external partnerships;

- ▶ Strengthen supply chain approaches and targeted support for MSMEs;
- ▶ Strengthen national data systems and monitoring on forced labour and child labour, aligned with the proposed NAPFL, including capacity-building for data collection, analysis, coordination and responsible data sharing; and
- ▶ Enhance engagement strategies for employers and workers.

Conclusion

The ADVANCE project made a relevant and timely contribution to advancing FPRW in Malaysia, particularly through its support to the development of NAPFL 2026–2030, facilitation of stakeholder engagement, and increased awareness of forced labour and child labour issues. Its key strengths are reflected in its strong strategic alignment with national priorities, its ability to adapt implementation approaches in response to emerging challenges, and its effectiveness in convening diverse stakeholders across government, employers, and workers.

At the same time, the evaluation indicates that further progress will depend on strengthening operational capacity, ensuring more sustained engagement beyond project cycles, and deepening the integration of project outputs into institutional systems and practices. While the project has contributed to establishing important enabling conditions, translating these into sustained behavioural and systemic change will require continued investment and follow-up. Overall, the project has laid a solid foundation, with its results positioned to be further consolidated and scaled through longer-term national processes and ILO programming frameworks, particularly under the Decent Work Country Programme (DWCP) 2026–2030.

▶ 1. Background and Project Context

1.1 Country and Sector Context

Despite strong economic growth and increasing integration into global markets, persistent labour rights concerns were documented, particularly among migrant workers in Malaysia. Migrant workers represented a significant share of the workforce in sectors such as manufacturing, electronics, construction and plantations. Evidence from labour force surveys and ILO-supported Migrant Resource Centres pointed to patterns of non-compliance with labour standards affecting migrant workers, including poor working conditions, non-payment/ withholding of wages, discrimination, excessive working hours and other abusive employment practices.³

Although child labour was not widespread nationally, studies and reports indicated its presence in certain sectors such as palm oil plantations and among particularly vulnerable populations.⁴ Children living in poverty-affected communities, rural areas, plantations and informal economic activities were considered most at risk. Stateless, refugee and undocumented children were especially vulnerable due to limited access to education, legal protection and social services. In some cases, children were engaged in hazardous tasks while assisting family livelihoods or working informally, exposing them to exploitation and unsafe working conditions. These challenges were particularly evident in parts of Sabah and Sarawak where socioeconomic

³ ILO, Review of Labour Migration Policy in Malaysia, 2016.

⁴ Malaysian Ministry of Plantation Industries and Commodities, The Employment Survey in Oil Palm Plantations, 2018.

vulnerabilities, migration dynamics and limited institutional reach created heightened risks of child labour and hazardous work among children.⁵

National development strategies including the 12th and 13th Malaysia Plan, Ekonomi MADANI and other national frameworks emphasise technological upgrading, digitalization and higher value-added production, positioning the E&E sector as a key pillar in Malaysia's transition toward a high-income, innovation-driven economy.⁶ However, international reports and investigations have highlighted recurring risks of forced labour in this sector as well.⁷ These risks were associated with unfair recruitment practices such as excessive recruitment fees, debt bondage, passport retention, wage deductions, contract substitution, long working hours and restrictions on worker mobility. Migrant workers are particularly vulnerable due to complex recruitment chains, dependence on intermediaries, and limited awareness of their rights. Weak enforcement capacity, fragmented oversight of labour recruitment processes, and multilayered subcontracting arrangements contributed to the persistence of forced labour indicators in these sectors, raising concerns among governments, international organizations and multinational enterprises about labour standards within global supply chains.⁸

Malaysia has undertaken significant reforms to strengthen labour governance and align business practices with the ILS. Legislative amendments, including changes to the Employment Act 1955 and other labour laws, expanded protections for workers and strengthened enforcement mechanisms. Malaysia ratified the Protocol of 2014 to the Forced Labour Convention and introduced NAPFL 2021-2025, National Action Plan on Trafficking in Persons (NAPTIP) 2021-2025 and National Action Plan on Business and Human Rights (NAPBHR) 2025-2030. The adoption of the NAPBHR 2025-2030 reflects increasing attention to responsible business conduct, environmental, social and governance (ESG) standards and human rights due diligence across supply chains.

The current broader labour market context reveals ongoing decent work deficits that intersect with forced labour and child labour risks. These include persistent informality, labour shortages in certain sectors, limited collective representation, and uneven enforcement of labour standards. Subnational regions continue to face vulnerabilities linked to informality, migrant-dependent industries and hazardous child labour risks. Risks of forced labour continue to persist in sectors reliant on migrant workers, including manufacturing, construction, plantations and domestic work. Migrant workers remain concentrated in low-paid and low-skilled occupations with limited access to training, mobility and labour protections, while fragmented migration governance and complex subcontracting structures continue to obscure accountability within employment chains.⁹

1.2 Project Description

The ADVANCE project was developed in response to persistent challenges in Malaysia related to forced labour, child labour, and the protection of workers' rights, particularly in the E&E manufacturing sector. Prior to project initiation, Malaysia had established legal frameworks addressing labour exploitation, however, gaps remained in enforcement, worker representation, and public awareness. Vulnerable groups including migrant workers, women, and youth were especially exposed to exploitation due to barriers in accessing legal protection and labour representation.¹⁰

⁵ ADVANCE Project Background and Justification.

⁶ Draft Malaysia DWCP 2026-2030.

⁷ Danwatch [report](#), 2019.

⁸ ILO, Review of Labour Migration Policy in Malaysia, 2016.

⁹ Draft DWCP 2026-2030.

¹⁰ ADVANCE Project Background and Justification.

Implemented by the ILO, with support from ESDC, the project sought to strengthen Malaysia's implementation of the FPRW. The project was strongly aligned with ESDC's strategic priorities, particularly in promoting and protecting internationally recognized labour standards and principles. Analytical outputs, including key studies, were instrumental in contextualizing labour rights issues within the Malaysian landscape and provided a solid evidence base to inform interventions.¹¹

The project aligned with the Malaysia DWCP 2019–2025 and contributed to international commitments such as Alliance 8.7, which aims to eradicate forced labour, modern slavery, human trafficking, and child labour. The DWCP 2019–2025 prioritized strengthening rights at work, improving labour migration governance and addressing emerging challenges in the future of work. During this period, the ILO supported Malaysia through several technical cooperation initiatives aimed at strengthening labour governance and promoting compliance with the ILS, including through ADVANCE Project.

ADVANCE adopted a comprehensive and collaborative approach that engaged government institutions, employers' organizations, trade unions, and civil society. The project focused particularly on the E&E sector, which is an important export industry, where improving labour practices can have significant impact across supply chains. The project's strategy integrated policy reform, institutional capacity building, awareness raising, and worker empowerment. The initiative also promoted gender- and age-responsive approaches to labour governance and victim protection.

The ADVANCE project was designed to contribute to “enhanced national and sectoral actions in Malaysia to adopt and implement international labour standards on the FPRW on forced labour and child labour” and through four main project outcomes:

- ▶ Outcome 1: By 2026, laws and policies to address FL and CL take into consideration specific vulnerabilities and needs of at-risk population and are gender- and age responsive.
- ▶ Outcome 2: By 2026, enforcement of forced and child labour laws is strengthened, and victims' rights are protected.
- ▶ Outcome 3: By 2026, the public is sensitized about forced and child labour laws.
- ▶ Outcome 4: By 2026, freedom of association and the right to collective bargaining of women and men, local and migrant workers, in the E&E sector in Malaysia are enhanced and contribute to addressing forced labour and child labour.¹²

The project aimed to generate measurable improvements in labour governance and worker protection in Malaysia. Key anticipated results included:

- ▶ Legislative amendments incorporating gender- and age-responsive protections against FL and CL;
- ▶ Increased compliance with national labour laws among companies in the E&E sector;
- ▶ Reduced labour violations and improved enforcement outcomes;
- ▶ Expanded access to information on labour rights and reporting mechanisms for workers and the public;
- ▶ Greater participation of migrant workers in trade unions;
- ▶ Increased representation of women in trade union leadership; and
- ▶ Adoption of inclusive union policies that support migrant and youth workers.¹³

1.3 Theory of Change

The project was designed on the premise that persistent risks of FL and CL in Malaysia were linked to a combination of legal and institutional challenges and worker-level vulnerabilities. These included gaps in the responsiveness of labour laws and policies to the needs of vulnerable groups, limited enforcement capacity, low awareness of labour rights, limited capacity to prevent and address FL and CL among employers, weak

¹¹ ESDC interviewee.

¹² Project factsheet.

¹³ Page 1, Annex B (Project Document) of the Grant Agreement, 04 April 2023.

reporting mechanisms among workers and the public, and limited worker representation, particularly for migrant workers.

The project's theory of change assumed that strengthening these elements of the labour governance would improve the prevention of FL and CL and advance FPRW in Malaysia. Specifically, it was expected that if labour laws and policies were strengthened and made more responsive to vulnerable populations, enforcement capacity and monitoring mechanisms were improved, workers and the public became better informed about labour rights and complaint mechanisms, employers were better capacitated on preventing FL and CL, and workers' organizations were strengthened to represent migrant workers, then violations of FL and CL would be more effectively detected and addressed. Over time, these changes were expected to contribute to improved protection of vulnerable workers and to the prevention of FL and CL.

To operationalize this theory of change, the project was structured around four complementary pathways addressing legal and policy frameworks, enforcement capacity, workers awareness and reporting mechanisms and employers capacity, and worker representation. The project design assumed that progress across these areas would collectively strengthen institutional responses to FL and CL and contribute to improved protection of vulnerable workers.

- ▶ The first pathway focused on **policy and legal reform**. The project reviewed national labour laws and policies and provided recommendations on how they could be improved to better address FL and CL, with particular attention to gender and age responsiveness. The project supported policy dialogue with government agencies on the adoption of recommended reforms to ensure that legislation reflected the needs of vulnerable populations.
- ▶ The second pathway focused on **strengthening enforcement mechanisms**. The project intended to do this by training labour inspection using specialized tools and curriculum and institutionalizing learning modules on forced labour, child labour, and workplace harassment. Originally, it also planned to support the development of a database of companies sanctioned for labour offenses and a forced labour knowledge sharing system. The project also supported the assessment of victim-support services providing recommendations on how they could be improved to better protect affected workers and ensure access to rehabilitation and remedies.
- ▶ The third pathway addressed **awareness and access to reporting mechanisms**. The project planned to support the development of communication strategies and information campaigns, as well as a simplified and translated guide on national labour laws on forced labour disseminated to the employers within the E&E sector. The project also planned to support the enhancement of public reporting tools on FL and CL to enable workers and the public to report violations more easily and safely.
- ▶ The fourth pathway focused on **worker representation and social dialogue**, particularly within the E&E sector. Trade unions in the E&E sector were targeted to benefit from project support to increase membership among both migrant and local workers. The project also promoted women's leadership in unions and inclusive union policies that strengthened workers' collective voice and help prevent labour exploitation.

▶ 2. Purpose, Scope and Users of the Evaluation

2.1 Evaluation Purpose

In line with [ILO Guidance Note 2.2 on Internal Evaluations](#), the purpose of this final internal evaluation is twofold:

- ▶ **Accountability:** to assess the extent to which the project achieved its intended objectives and results; and

- ▶ **Learning and improvement:** to generate lessons learned, good practices, and actionable recommendations to inform future ILO interventions and stakeholder initiatives.

2.2 Evaluation Objectives

The evaluation will:

- ▶ assess the project's achievement of its stated objectives, outcomes, and outputs, applying the OECD/DAC criteria (relevance, coherence, effectiveness, efficiency, impact and sustainability);
- ▶ evaluate the synergies and sustainability of the project's interventions in relation to the DWCP, national strategies and frameworks, as well as SDGs;
- ▶ examine into the adaptability of the project to remain relevant to the needs of project beneficiaries; and
- ▶ document the lessons learnt, identify project strategies and good practices, and provide recommendations that will support organizational learning and knowledge sharing for the ILO, the ESDC, and other key stakeholders, for future interventions.¹⁴

2.3 Intended Users

Primary users include the ADVANCE project team, ILO Project Office in Kuala Lumpur, ILO-ROAP management, ILO Decent Work Team (DWT)/CO-Bangkok, ILO FUNDAMENTALS Branch, and ESDC. Secondary users include national tripartite constituents, other ILO technical units, relevant UN agencies, CSOs and service providers.

2.4 Scope of the Evaluation

The evaluation covered the entire period of project implementation in Malaysia, across all outcomes and outputs. It addressed cross-cutting ILO priorities, including gender equality and non-discrimination, ILS, social dialogue and tripartism and environmental sustainability.

▶ 3. Evaluation Methodology

3.1 Evaluation Criteria and Questions

The evaluation applied the following OECD-DAC criteria as defined in the inception report.

▶ **Table 1. Scope of Evaluation Questions**

Evaluation Criterion	Scope of Evaluation Questions
Relevance and Coherence	▶ Assess the extent to which the project design responded to the needs and priorities of ILO constituents, beneficiaries, and partners; ▶ Examine alignment with national policies and development frameworks; review the adequacy of stakeholder consultations during design; and ▶ Assess the coherence and soundness of the project's logic, including its objectives, strategies and theory of change, as well as design elements that could inform future interventions.
Effectiveness	▶ Examine the extent to which the project achieved its intended outcomes and outputs; assess the relative performance of different project components; ▶ Identify internal and external factors that facilitated or constrained progress; and ▶ Evaluate how effectively the project adapted to emerging challenges and evolving stakeholder needs during implementation.

¹⁴ Final Evaluation Terms of Reference.

Evaluation Criterion	Scope of Evaluation Questions
Efficiency	▶ Evaluate how efficiently financial, human and technical resources were used to achieve results; ▶ Assess the adequacy of management arrangements; ▶ Examine whether synergies with other ILO, UN, donor-funded or national initiatives contributed to efficiency; and ▶ Review the effectiveness of monitoring and data systems in supporting evidence-based decision-making and adaptive management.
Impact Orientation	▶ Assess the project's contribution to addressing FL and CL in the E&E sector; ▶ Examine how the project strengthened the institutional capacity of government and employers' and workers' organizations; and ▶ Identify early signs of systemic or behavioural change that may contribute to longer-term impact.
Sustainability	▶ Consider the likelihood that project results will be sustained after external support ends; ▶ Examine the degree of ownership by national partners; ▶ Identify strategies, approaches or institutional arrangements with potential for replication or scaling up; and ▶ Analyse key policy, institutional, financial and capacity factors required to sustain results.
Cross-cutting Issues	▶ Assess how effectively cross-cutting priorities were integrated into the project, including gender equality and non-discrimination, social dialogue and engagement of workers' and employers' organizations, the operationalization of ILS, and environmental sustainability considerations relevant to the E&E sector.

Please see **Annex B** for complete List of Evaluation Questions.

3.2 Data Collection Methods

The evaluation draws on four main data collection methods:

- ▶ **A desk review** was conducted to analyse a wide range of project and contextual documentation. This included the project document (PRODOC), donor proposals, grant agreement, technical progress reports, monitoring and evaluation data, and key outputs produced under the project. In addition, relevant national policy frameworks, legal instruments, and strategic documents such as the DWCP 2019-2025 and updated draft for 2026-2030, national development plans and strategies were reviewed to assess the project's alignment with national and international priorities.
- ▶ **Key informant interviews (KIIs)** were undertaken using semi-structured interview guides to gather in-depth insights from a broad range of stakeholders. These included ILO project staff, regional specialists, donor representatives and a worker organization.
- ▶ **Focus group discussions (FGDs)** were conducted with MOHR, MEF and the MTUC. Both the KIIs and the FGDs enabled the evaluation to capture diverse perspectives on project design, implementation, and results.
- ▶ **A validation process** was carried out in May, whereby preliminary findings were presented to the ILO and key stakeholders. This step ensured factual accuracy, enhanced the credibility of findings, and allowed stakeholders to provide feedback and clarification before finalization of the evaluation.

3.3 Data Analysis and Triangulation

Data from different sources were analysed using a thematic approach, guided by the evaluation criteria. Information from interviews were reviewed to identify common themes, patterns, and differences in stakeholder views. This was combined with evidence from project documents, monitoring data, and reports to provide a more complete picture of project performance. The analysis focused not only on what the project achieved, but also on how and why results were achieved or not achieved, including the role of design choices, implementation challenges, and contextual factors, as outlined in the inception report.

To strengthen the reliability of findings, the evaluation applied a triangulation approach, meaning that information was cross-checked across different sources and methods. For example, findings from document review were compared with interview insights, and perspectives from different stakeholders such as government, employers, workers, and partners were analysed together. This helped confirm consistent findings and identify areas where views differed.

3.4 Limitations and Mitigation Measures

While the mixed-methods approach enhanced the quality of the evaluation, some limitations remained. These included the potential for response bias in interviews, uneven availability of stakeholders, and the inherent challenge of attributing higher-level outcomes directly to project interventions within a relatively short timeframe. To mitigate these limitations, the evaluation triangulated findings across multiple data sources, including document review and stakeholder interviews, and applied cautious interpretation when assessing contribution rather than direct attribution.

A more specific limitation related to the timing of the evaluation, which was conducted over a short period and coincided with a major holiday in Malaysia. Although the project reached out to a broader group of stakeholders, responses were primarily received from established ILO partners, namely MOHR, MEF, and MTUC. As a result, perspectives from E&E sectoral employers and unions were not captured. This gap was partially addressed by drawing on available project documentation; however, their absence may limit the depth of sector-specific insights.

For future projects, evaluations should mitigate the same risk by allowing for a longer data collection period, scheduling interviews outside peak holiday periods, and incorporating alternative methods of engagement (e.g., follow-up virtual interviews or written inputs) to broaden stakeholder participation.

► 4. Findings

4.1 Relevance, Coherence and Validity of Design

4.1.1 To what extent did the project's objectives, strategies, and theory of change respond to stakeholder needs?

These are the project stakeholder groups that could be **inferred** based on how the project was designed, with reference to project documents including before inception phase¹⁵:

► **Table 2. Stakeholders groups and their needs**

Stakeholder Group	Role in FL/CL	Identified Needs / Issues	How Project Addresses Needs
To be Engaged/Involved by the Project			
MOHR, MOHA, MOWFCD, AGC and other relevant agencies	Policy-making, legal reform	Forced labour and child labour-related laws not fully addressing vulnerabilities (gender, age, migration status)	- Policy reviews and recommendations - Policy dialogues and workshops
DOL, DOSH, MAPO, Immigration Department, Royal Malaysian Police	Law enforcement relevant to forced labour and child labour	- Limited coordination across agencies - Limited capacity to identify and address forced/child labour - Lack of institutionalized training	- Structured training programmes - Institutionalization of inspection training systems
MTUC and sectoral trade unions	Worker representation	- Low membership among migrant workers - Limited inclusion of women and youth	- Strengthening union capacity - Promoting inclusive union policies

¹⁵ Application for Funding, Background & Justification, and Logical Framework

Stakeholder Group	Role in FL/CL	Identified Needs / Issues	How Project Addresses Needs
MEF and sectoral employers' organizations	Industry coordination and support to member employers	Need to build capacity across companies in terms of compliance to labour standards	Collaboration on sector-wide guidance and outreach
Employers / private sector (especially E&E sector)	Compliance actors	- Limited awareness of labour standards - Need for practical guidance on compliance	- Development of simplified labour law guides - Awareness and training initiatives
Civil society organizations (CSOs) and Embassies	Support victims, advocacy	- Need for better coordination and tools - Limited integration into policy processes	- Engagement in consultations and research - Inclusion in policy dialogues
Not Directly Engaged by the Project			
General public	Awareness & reporting role	- Low awareness of labour rights and violations - Weak engagement in reporting	- Public awareness campaigns - Improved reporting mechanisms
Workers including forced labour and child labour victims (local & migrant, especially vulnerable groups)	Beneficiaries	- Exposure to forced labour and child labour - Limited awareness of rights - Low union membership - Barriers to reporting abuses and legal processes - Limited access to support services	- Awareness campaigns - Improved reporting systems (apps, hotlines) - Support for unionization - Assessment and improvement of victim-support services - Victim-centered policy recommendations
Women, youth and children (especially from migrant / stateless populations)	Beneficiaries	- Policies not gender- and age-responsive - Higher vulnerability to exploitation	- Gender- and age-responsive legal reforms - Inclusive policy design

The project identified **government institutions and enforcement agencies** as central stakeholders with both policy-making and operational responsibilities in addressing FL and CL. The problem analysis¹⁶ highlighted key gaps, including legal frameworks that did not fully reflect vulnerabilities related to gender, age, and migration status, as well as weak inter-agency coordination and limited enforcement capacity. In response, the project supported policy reviews, the development of legal reform recommendations, and the facilitation of policy dialogues and workshops. At the operational level, it delivered structured training programmes and initially planned to contribute to the institutionalization of the training guide to support institutional capacity-building of labour inspectors, thereby addressing capacity constraints and promoting more consistent enforcement practices.

For **ultimate beneficiaries**, including workers, particularly migrant workers, women, youth, and children, the project identified multiple and intersecting vulnerabilities: exposure to FL and CL, limited awareness of labour rights, low levels of union representation, low representation of women in union leadership, barriers to reporting abuses, and insufficient access to victim-support services. The project was designed to increase their knowledge about FL through a nationwide communication plan, to improve FL and CL reporting mechanisms and access to victim-support services, and to promote freedom of association and right to collective bargaining and to support increased unionization.

The project also engaged **intermediary stakeholders**, including trade unions, employers and their representative organizations, and civil society organizations (CSOs). The needs assessment¹⁷ found that trade unions faced challenges in expanding membership among migrant workers and ensuring inclusion of women and youth, while employers required greater awareness and practical guidance to comply with

¹⁶ Both "problem analysis" and "needs analysis" cover not just those stated in project documents, but on what have been shared during interviews.

¹⁷ Ibid.

labour standards. CSOs were found to have limited coordination and insufficient integration into policy processes. To address these needs, the project was designed with interventions such as capacity strengthening for trade unions, the promotion of inclusive union policies, the development of simplified labour law guidance for employers, sector-wide outreach in collaboration with employer organizations, and CSO participation in consultations and research.

Respondents consistently described the project as addressing key national and sectoral issues related to FL and CL. Project staff explained that the design was closely linked to existing national policy processes, particularly the NAPFL, with studies and consultations feeding directly into these frameworks.¹⁸ ILO also noted that the project responded to a specific gap in promoting FPRW, particularly in a context of global trade with the project helping raise awareness of FL and CL risks in connection with international trade requirements and ESG expectations. The project has also set the scene for much larger portfolio of similar projects in the Asia-Pacific region.¹⁹ Trade unions shared that the project addressed priority concerns such as migrant workers' vulnerabilities, forced labour, and labour rights awareness, and that the ILO provided technical inputs that helped unions engage more effectively in discussions throughout the project duration. However, they also highlighted that workers' voices still need stronger recognition, particularly in policy-making processes.²⁰

Employers explained that the project responded to their needs in relation to ESG compliance, which is increasingly required by global buyers. However, they elaborated that many companies, especially MSMEs, still have limited understanding of ESG and struggle with implementation, indicating that needs in this area are still evolving.²¹

Several respondents²² described how needs changed during implementation:

- The initial framing around forced labour and child labour triggered resistance, particularly from employers and sector actors. This required shifting toward a preventive framing, focusing on risk management and compliance.
- Stakeholders expressed a need for broader engagement beyond a single sector, suggesting that a multi-sector or hybrid approach would better reflect real operational challenges and enable cross-learning.

4.1.2 How well did the project align with national priorities and policy frameworks?

During the evaluation period (2023–2026), Malaysia's national priorities were framed by the 12th Malaysia Plan and the transition toward the 13th Malaysia Plan and Ekonomi MADANI, alongside sectoral strategies such as New Industrial Master Plan 2030 and National Semiconductor Strategy (NSS). These frameworks emphasized inclusive growth, productivity, labour market resilience, and responsible industrial development, including improved labour standards in global supply chains. In parallel, the DWCP 2019–2025 priority pillars include "rights at work," "future of work," and "labour migration governance," while the UNSDCF 2026–2030 strategic priority pillars was structured around "inclusive social development," "sustainable economic transformation," "environmental sustainability," and "governance," underpinned by human rights and gender equality. Legal and policy reforms including amendments to labour laws and the implementation of NAPFL, NAPTIP, and NAPBHR further reflected a national shift toward addressing FL, CL, and workers' rights, although enforcement gaps persisted.

The ADVANCE project demonstrated strong alignment with these frameworks by supporting national level legal reform and institutional strengthening while targeting the E&E sector, a priority industry under

¹⁸ Multiple project staff.

¹⁹ An ILO interviewee.

²⁰ Multiple worker representatives.

²¹ Employer representative.

²² Multiple interviewees.

national economic strategies. Through the development of simplified labour law guides and employer engagement, the project supported national priorities on responsible business conduct and human rights due diligence, contributing to improved labour standards within export-oriented supply chains. Interventions contributing to strengthening labour inspection institutional and operational capacity, and improving reporting mechanisms were planned at the beginning to address gaps in enforcement capacity, coordination, and access to justice. These efforts were consistent with national frameworks such as NAPFL, which emphasize prevention, detection, and remediation of forced labour, including among migrant workers in the E&E sector.

By promoting inclusive union policies, leadership training (including for women), and increased participation of migrant workers, the project aimed to strengthen freedom of association and collective bargaining. Interventions on victim support and awareness raising were aligned with the principle of “leaving no one behind”.

Multiple ILO officials explained that the project was implemented during a period of ongoing labour law reform, and that Malaysia’s engagement with global trade issues increased the relevance of FL and CL interventions. They noted that the project helped bring together different policy processes, contributing to greater coherence across national frameworks.²³

However, several respondents described limitations in consultation during the design phase:

- Time constraints during proposal development limited the depth of stakeholder consultations, which affected early alignment with government priorities.
- During inception, stakeholders questioned the relevance of focusing on the E&E sector, and considerable effort was needed to explain and justify this focus.²⁴

Worker representatives and the ILO reported that MTUC was not actively engaged at the beginning, mainly due to internal challenges, and only became involved later in awareness-raising and technical inputs. Other trade unions, including the sectoral unions, however, were engaged during this inception phase, representing workers’ voices.²⁵

4.1.3 How coherent and sound was the project logic and design?

The ADVANCE project demonstrated a high level of internal coherence, with a clear alignment between its problem analysis, objectives, strategies, and expected outcomes. The project appropriately identified key drivers of FL and CL in Malaysia and translated these into four complementary outcome areas. This reflected a logical and consistent intervention design, from identified challenges to proposed solutions, particularly through its strategic focus on the E&E sector.

The project’s theory of change was conceptually sound and adopted a systems approach by addressing policy, institutional, and worker-level dimensions. Respondents described the project logic as linking policy development, capacity building, and awareness raising, with the aim of improving prevention and response to FL and CL.²⁶ The integration of policy reform, enforcement strengthening, awareness-raising, employer capacity building and worker empowerment is aligned with international good practice. However, the theory of change assumptions were insufficiently articulated, and the absence of explicit risk mitigation measures limited the robustness of the intervention logic. Particularly within the context of rapidly changing trade

²³ Multiple interviewees.

²⁴ Multiple interviewees.

²⁵ Multiple interviewees.

²⁶ Multiple project staff.

dynamics, risks can significantly affect project relevance, stakeholder engagement, and implementation pathways.²⁷

The project's strategies were relevant and appropriate, particularly its multi-stakeholder approach and its emphasis on gender- and age-responsive interventions. Nonetheless, some links in the results chain appeared optimistic, especially regarding the translation of intermediate outcomes (e.g. awareness, representation) into sustained behavioural change and reduced labour violations. These outcomes are influenced by external factors such as political will, leadership changes, employer practices, and barriers faced by migrant workers, which could require longer duration to address/mitigate.

An ILO Specialist noted that one strength of the project was its ability to connect multiple frameworks (NAPFL, NAPTIP, NAPBHR), creating a more integrated approach to labour rights.²⁸

However, several challenges to coherence were noted:

- Multiple ILO projects were operating in similar thematic areas, leading to overlaps in activities and sometimes unclear division of responsibilities.²⁹
- Focusing on one sector may limit participation and that multi-sector engagement allows for broader learning and relevance.³⁰

The coherence of the project design is also reflected in how institutional arrangements and staffing structures were configured to support delivery. The project operated without a full country office structure, relying on a project-based setup with limited staffing. The Technical Officer role was described as covering technical, coordination, and UN Country Team (UNCT) functions simultaneously, requiring the balancing of multiple responsibilities.

In addition, the project design and staffing composition relied heavily on regional specialists and DWT support, particularly on FUNDAMENTALS, ILO Bureau for Workers' Activities (ACTRAV), ILO Bureau for Employers' Activities (ACTEMP), and Labour Administration, Labour Inspection, and Occupational Safety and Health Department (LABADMIN/OSH). The project had a Technical Officer but was not solely-funded and focused on the project only. This project arrangement depended on a combination of in-country coordination and external technical inputs, in consideration of available project and office resources.

► **Table 3. Summary of Project Design Learnings**

Design Area	Elements to Retain	Elements to Improve
Responsiveness to Stakeholder Needs	• Strong alignment with identified stakeholder needs across policy, enforcement, employers, unions, and vulnerable workers • Needs assessment should be validated with stakeholders during design/inception, not only based on document review • Focus on migrant workers, women, youth, and vulnerable groups, reflecting real FL/CL risks • Integration of ESG especially for employers	• Stronger incorporation of evolving employer needs (especially MSMEs) and practical implementation challenges • Anticipate stakeholder sensitivities earlier in design stage as part of risk assessment

²⁷ Donor interviewee.

²⁸ ILO Specialist.

²⁹ Multiple ILO staff.

³⁰ Employer representative.

Adaptation to Evolving Needs	• Ability to shift framing from FL/CL to preventive/compliance approach, which improved engagement • Flexibility to adjust activities based on stakeholder feedback	• Build adaptive pathways directly into the theory of change, instead of reacting during implementation³¹ • Include explicit mechanisms to track evolving needs (e.g., sector feedback loops, periodic reassessment)
Alignment with National Priorities	• Strong alignment with NAPFL, NAPTIP, NAPBHR and labour law reform processes • Alignment with national economic priorities (E&E sector, ESG, supply chains)	• Allow more time in design phase to validate assumptions on sector relevance • Improve clarity in linking project design language with national, and ILO and UN frameworks
Stakeholder Consultation & Inclusion	• Engagement of tripartite stakeholders (government, employers, workers) as core design principle • Inclusion of CSOs, embassies, and sectoral actors in consultations	• Ensure key actors are engaged from the beginning • Strengthen structured consultation mechanisms during design phase, not only during implementation
Project Logic & Theory of Change	• Clear linkage between problem analysis and interventions • Systems approach addressing policy, institutional, and worker-level support • Integration of gender- and age-responsive elements • Logical structure connecting policy → capacity → awareness → improved protection	• Include risk analysis and mitigation measures in design • Avoid overly optimistic assumptions on speed of institutional and behavioural change
Sectoral Approach	• Sector focus (E&E) provided a clear entry point linked to supply chains and migrant labour risks • Enabled alignment with global standards and buyer requirements	• Avoid overly narrow sector focus; adopt hybrid approach in the design • Budget for and conduct baseline sector assessments before implementation to map entry points • Better anticipate sector resistance and engagement barriers
Coherence Across Projects	• Complementarity with other ILO projects allowed resource sharing and thematic alignment	• Define clear roles, focal areas, and timelines across projects to avoid overlap • Establish formal coordination mechanisms across projects at design stage and for regular knowledge sharing during implementation phase
Institutional Setup & Staffing Model	• Use of regional specialists and DWT expertise allowed access to technical knowledge • Cost-sharing across projects enabled delivery despite limited resources	• Strengthen in-country capacity and rationalize staffing structure using criteria that would meet not only the project requirements but also what the office needs for sustainability and in consideration of budget implications • Plan staffing and cost-sharing arrangements more clearly at design stage to reduce coordination burden

4.2 Effectiveness

4.2.1 To what extent were intended outcomes and outputs achieved?

During the final reporting period, the project completed all planned outputs under the approved revised workplan, including the draft NAPFL 2026–2030, updated labour inspector training guide and training, NAPFL communication strategy and implementation plan, ESG modules for employers, and trade union capacity-building package and workshop.³² This indicates strong delivery performance under the revised workplan, although several outputs remain at an early stage of institutional uptake and require follow-up for

³¹ This can be operationalized by incorporating explicit risk scenarios, alternative pathways, decision triggers, and feedback mechanisms within the theory of change, enabling structured and proactive adaptation rather than reactive adjustments.

³² Project Final TPR.

full operationalization. The project demonstrated **moderate to high** effectiveness in delivering its intended outputs and contributing to outcomes, particularly at the policy and awareness levels, despite operating under constrained financial and human resources and within a relatively short implementation timeframe. Respondents noted that the project was able to achieve several key deliverables, including policy inputs, capacity-building activities, and stakeholder engagement processes, often by leveraging partnerships and adapting to emerging challenges. However, the limited duration of the project and resource constraints affected the depth, continuity, and institutionalization of some interventions, particularly those requiring sustained technical support, behavioural change, or system-level transformation. As a result, while progress was evident across all outcome areas, several outputs remained at early stages or require longer-term follow-up to fully realize their intended outcomes.

Outcome 1 – Policy and legal frameworks

Outcome 1 was designed to **strengthen the legal and policy framework on forced labour and child labour**, with the project intending to generate evidence and influence legislative and policy reform processes. The planned deliverables included analytical studies on existing laws and enforcement gaps, as well as multi-stakeholder consultations to promote the uptake of recommendations. The expected results were the development and adoption of more robust, gender- and vulnerability-responsive policies and laws, aligned with international standards.

The project contributed to strengthening policy processes, through consultations and technical recommendations from the policy review on [“Addressing forced labour and child labour in the electronics and electrical sector in Malaysia”](#) and “Self-Assessment on the NAPFL 2021-2025³³” which both fed into the development of NAPFL 2026-2030. It also supported greater coherence across national frameworks, with stakeholders noting that the project helped bring together NAPFL, NAPTIP, and NAPBHR processes and sustained government engagement on forced labour issues.³⁴ These contributions positioned the project as a key facilitator of policy dialogue and alignment. Most of the recommendations from the studies were incorporated in the draft NAPFL 2026-2030. The NAPFL covers prevention, enforcement, prosecution, partnerships, fair recruitment, and victim protection and access to justice. It also includes stronger attention to child labour, workers in irregular situations, data systems, and high-risk sectors such as manufacturing, construction, domestic work, plantations and fisheries. The draft NAPFL was completed, accepted by MOHR, and taken forward for inter-governmental review.

Additionally, for the NAPBHR, the project contributed inputs to the draft, incorporating issues covering FPRW.

Outcome 2 – Enforcement and victim protection

Outcome 2 was intended to **enhance enforcement capacity and improve protection mechanisms for victims of forced and child labour**. The project planned to deliver institutionalized training programmes for labour inspectors, strengthened inspection mechanisms, improved inter-agency coordination, and enhanced reporting and data systems, alongside assessments of victim-support services. The anticipated results included more effective enforcement practices and tools, and strengthened victim-centred service delivery, indicating a shift toward more responsive and operational enforcement systems.

The labour inspector training covering E&E and other sectors was delivered by ADVANCE Project support online from 26–30 January 2026 with 30 labour inspectors from Peninsular Malaysia, Sabah and Sarawak. Post-training quiz scores among 21 respondents ranged from 81% to 100%, suggesting strong knowledge acquisition. Participants also reported practical intended changes, including probing recruitment fees more deliberately, asking more structured interview questions, and focusing earlier on sector-specific risk

³³ Unpublished report.

³⁴ Multiple ILO officials.

factors.³⁵ The training, however, did not cover ILO Strategic Compliance Plan (SCP). Another ILO project funded by the US Department of Labour was supporting labour inspection SCP promotion and implementation in Malaysia. However, such project was abruptly ended due to funding issues. This was not anticipated during ADVANCE project design.³⁶ DOL interviewees indicated that SCP approach to labour inspection is critical given the challenges in outreach and coverage of the labour inspectorate.³⁷

Under this Outcome, the project also commissioned a consultant to develop the study “[Bridging Gaps, Building Support: Strengthening Services for Forced Labour Cases](#)”. The recommendations from this study were also incorporated in the draft NAPFL 2026-2030.

Additionally, the project planned to support the development of a complaints/database mechanism to improve transparency and deterrence on labour exploitation. While the concept was technically reflected in the NAPFL 2021-2025, it was not implemented due to government concerns over data sharing, internal clearance requirements, and institutional readiness. The project re-allocated its time and resources on the other project activities instead, particularly on the NAPFL 2026-2030 formulation.³⁸

Outcome 3 – Public awareness and reporting

Outcome 3 aimed to **increase awareness and engagement among the public and key stakeholders in preventing and reporting labour violations**, with a particular focus on the E&E sector. The project intended to deliver communication strategies, awareness campaigns, and practical guidance for employers, as well as improvements to FL and CL reporting mechanisms. From an evaluation standpoint, this outcome reflected a preventative and behavioural-change approach, seeking to address root causes such as low awareness and underreporting. The expected results included increased awareness of labour rights, greater use of reporting channels, and improved compliance among employers, particularly through the uptake of good practices in the E&E sector.

Under Outcome 3, the project completed the NAPFL 2026–2030 communication strategy and implementation plan, with MOHR ownership and consultation with workers’ and employers’ representatives as well as other government bodies. The strategy gives MOHR a structured framework and operational roadmap for coherent, coordinated and prevention-oriented communication in support of NAPFL 2.0 implementation.³⁹

The project conducted webinars targeting a broad range of stakeholders to increase awareness of FPRW, particularly forced labour and child labour. In addition, the project partnered with the ILO Japan-funded Responsible Value Chain (RVC) Project and the ACTEMP to support the MEF Academy in the development, as well as the regional promotion and outreach of the ESG module for employers, which integrates FPRW. The Legislation Module of this course covered national and/or sectoral level regulatory implications and all relevant national legislation (or envisaged) and its compliance obligations with a focus on: the application of Bursa Malaysia's Sustainability Reporting Guide (3rd Edition), the i-ESG Framework, and the National Sustainability Reporting Framework. The module was developed by Universiti Malaysia Sarawak (UNIMAS).

The course is currently managed, promoted and maintained by MEF Academy as part of its course offerings. It can be accessed through [this link](#). The ESG modules were finalized in November 2025 and embedded in MEF Academy’s training infrastructure. MEF assumed responsibility for logistics, course delivery, trainer

³⁵ Project final TPR.

³⁶ According to project staff, due to budget and time constraints the project was not able to cover the SCP.

³⁷ Multiple DOL respondents.

³⁸ Multiple project staff.

³⁹ Project final TPR.

mobilization and participant engagement⁴⁰, indicating a shift from project-supported development to partner-led delivery.

The MEF respondent for the evaluation expressed strong appreciation for the ILO's support in developing this module. However, according to him, uptake of the course remains low, and MEF noted that there is still a limited pool of qualified trainers available to deliver the programme. They also emphasized on need for follow-up with training participants as to how they implement what they learned from the trainings, which would require longer-term engagement and support.⁴¹

The project fully delivered an institutionalized communication plan for NAPFL 2026-2030. However, the planned public reporting mechanism was not completed due to lack of political and institutional buy-in particularly regarding public disclosure. The project pivoted and allocated its time and resources on the other project activities instead.⁴²

Outcome 4 – Freedom of association

Outcome 4 was designed to **strengthen social dialogue and worker representation**, particularly by enhancing trade union capacity and inclusiveness in the E&E sector. Planned deliverables included strategies to increase union membership among migrant and local workers, leadership training (with a focus on women), and the development of inclusive trade union policies and outreach activities. The intended results were increased participation of workers, especially migrants and women, in trade unions, strengthened union outreach, and more inclusive and gender-responsive union practices, contributing to improved worker voice in addressing FL and CL risks.

The project contributed to strengthening workers' organizations by enhancing knowledge and capacity among trade unions, including on labour law, FL, CL, freedom of association and collective bargaining.⁴³

The trade union workshop was held on 16–17 March 2026 in Kuala Lumpur, bringing together 25 representatives from 10 MTUC-affiliated unions, including leaders, organizers and rank-and-file members, both women and men. Participants came from unions connected to E&E as well as banking and finance, textiles, and food/catering. Average test scores increased from 63% to 83%, and participants reported readiness to apply learning in union or workplace roles. The training also produced practical tools such as organizing priorities, campaign plans, implementation trackers, replication plans, and proposed policy directions.

Evaluation respondents noted improved ability of union representatives to engage in policy discussions and negotiations, as well as increased attention to inclusion of migrant workers, women, and youth. At the same time, institutionalization, such as the adoption of union policies, remains ongoing, with respondents indicating that more time and sustained engagement are needed to achieve lasting results.⁴⁴

4.2.2 What factors facilitated or constrained progress?

Facilitating factors

Project implementation was facilitated by a strong alignment with national priorities and policy frameworks, particularly the NAPFL and the labour dimensions of the NAPBHR, as well as broader labour law reform

⁴⁰ Ibid.

⁴¹ MEF interviewee.

⁴² Multiple project staff.

⁴³ Multiple worker representatives.

⁴⁴ Ibid.

processes. This alignment, combined with strong ownership from the MOHR, provided legitimacy and clear entry points for engagement.⁴⁵ In addition, the ILO's role as a neutral convener, grounded in its tripartite social dialogue approach, helped build trust among government, employers, and workers and contributed to stakeholder ownership. External factors, particularly increasing global and national pressure on labour standards within export-oriented sectors such as the E&E industry, which created incentives for government and industry actors to engage with the project.⁴⁶

Collaboration and partnerships further supported implementation. Respondents highlighted effective coordination with other ILO projects and partners, which enabled resource sharing and strengthened technical delivery given its existing staffing structure. The government also recognized the effective and structured arrangements made by the project that met the availability and requirements of the stakeholders.⁴⁷ Engagement with employer organizations, including collaboration on ESG-related initiatives through platforms such as MEF, helped position labour standards within broader business compliance agendas. The project also benefited from flexibility from the donor, allowing adjustments to activities in response to emerging challenges and stakeholder feedback. This adaptability was particularly important in a complex and evolving context, where initial assumptions, such as the level of readiness within the E&E sector, did not fully hold.⁴⁸

“Government institutions were directly involved in the design of Malaysia’s forced labour action plan and communication plan, and this shaped both ownership and implementation in important ways.”

- Government respondent

Constraining factors

A key challenge was stakeholder resistance, particularly among employers from the E&E sector, where initial reactions included denial and reluctance to engage on FL and CL issues.⁴⁹ This was compounded by low awareness and limited demand for ESG compliance among small and medium-sized enterprises (SMEs), which often lacked both capacity and incentives to adopt new practices. This is different for large companies that are required to comply with the Responsible Business Alliance (RBA) standards.⁵⁰ Trade unions also reported limited early engagement, particularly of MTUC, which reduced the effectiveness of the tripartite approach in the initial stages. In addition, political and institutional challenges, including intra-union dynamics and coordination gaps across agencies, further complicated implementation.⁵¹

Technical and operational constraints also played a significant role. Multiple respondents noted that some technical outputs, particularly in labour inspection, lacked sufficient depth and still requires more specialized support to be operationally useful. This was clarified by project technical staff as due to limited resources allocated for labour inspection, a constraint that would need sufficient resources in the future. Limited staffing availability and technical capacity within ILO especially on labour inspection, and government counterparts constrained the scale and continuity of activities, while competing priorities within government

⁴⁵ Multiple ILO interviewees.

⁴⁶ Multiple interviewees.

⁴⁷ Government respondent.

⁴⁸ Multiple interviewees.

⁴⁹ Multiple ILO interviewees.

⁵⁰ Employer representative interviewee.

⁵¹ Multiple interviewees.

institutions affected sustained engagement.⁵² Administrative processes, including new system for procurement, and internal clearances, introduced delays that slowed implementation timelines.⁵³

4.2.3 How effectively did the project adapt to emerging challenges?

The project demonstrated a strong degree of adaptive management in responding to emerging challenges during implementation. Respondents consistently noted that the project was able to adjust its strategies, reallocate resources, and refine its approaches in response to stakeholder feedback and contextual realities.⁵⁴ These adaptations allowed the project to remain relevant and continue delivering key outputs despite constraints related to stakeholder resistance, limited resources, and varying levels of partner readiness.

A key emerging challenge faced by the project was stakeholder resistance, particularly from sectoral actors in the E&E industry, where initial framing around FL and CL triggered defensiveness and reluctance to engage. Respondents also noted low awareness and demand for ESG compliance among companies, especially SMEs, as well as varying levels of readiness among government and social partners to engage in more technical or systemic interventions. In addition, differences in institutional capacity, coordination challenges, and the complexity of certain outputs, such as on labour inspection, required the project to reconsider how activities were framed and delivered.

In response to these challenges, the project adapted its approach in several ways. One of the most significant shifts was the reframing of messaging from a direct focus on FL and CL toward a more preventive and compliance-oriented approach, which emphasized risk management and alignment with business practices. This shift helped reduce resistance and improve engagement, particularly with employers. The project also adjusted its engagement strategies by broadening outreach beyond a single sector and aligning activities more closely with national frameworks and stakeholder priorities. Training and communication approaches were further contextualized, including the use of local language, which improved participant engagement and learning outcomes.⁵⁵

Operationally, the project demonstrated flexibility through the reallocation of resources toward higher-impact activities, such as supporting the NAPFL assessment and related policy processes, and by adjusting timelines and delivery modalities based on partner readiness. Project staff highlighted that donor openness to justified changes enabled these adjustments, although approval processes, including within the ILO, could be time-consuming.⁵⁶ In addition, cost-sharing and collaboration with other ILO projects allowed the project to continue activities and maximize limited resources.⁵⁷

While these adaptive practices were effective in sustaining progress, respondents noted that future projects could benefit from more structured mechanisms for continuous stakeholder feedback, clearer decision-making processes for resource allocation in consideration of project scope, available resources and resource sustainability aims; and more proactive, forward-looking adaptation strategies.

⁵² Multiple interviewees.

⁵³ Multiple project staff.

⁵⁴ Multiple interviewees.

⁵⁵ Multiple ILO interviewees.

⁵⁶ Project staff.

⁵⁷ Multiple ILO interviewees.

► **Table 4. Summary of Effectiveness Learnings**

Area	Effective Elements	Less Effective Elements
Policy Engagement Approach (Outcome 1)	- Evidence-based approach (studies + consultations) effectively influenced policy development - Integration of recommendations into NAPFL 2026–2030	- Some results dependent on long-term government processes - Policy outcomes not fully realized within project timeframe (e.g., NAPFL not yet launched)
Capacity Building (Outcome 2 & 4)	- Awareness-raising among employers on ESG and compliance - Increased participation of representatives of women, youth, and migrant workers in discussions	- One-off trainings due to limited resources (e.g., labour inspection) insufficient for sustained capacity building - Limited follow-up reduced long-term effectiveness
Awareness & Behaviour Change (Outcome 3)	- Webinars and awareness campaigns reached broad stakeholders - Larger companies more responsive due to compliance requirements - Development of ESG module linked labour standards with business practices, and institutionalized through MEF Academy - Outreach at regional level in Malaysia expanded visibility on ESG issues	- Low uptake of ESG module due to limited demand and trainers - Awareness activities alone insufficient to drive compliance - SMEs had low awareness and weak incentives to engage
Strategic Positioning & Alignment	- Strong alignment with national frameworks enabled policy influence - Government ownership (especially MOHR) provided legitimacy and entry points - Alignment with international labour standards and ESG pressures increased relevance	- Some outputs dependent on government processes (e.g., NAPFL launch) faced delays beyond project control - Limited early validation of sector focus (E&E) led to initial resistance
Partnerships & Stakeholder Engagement	- Engagement with MEF and RVC strengthened employer outreach - ILO's neutral convening role strengthened social dialogue and trust - Engagement of multiple stakeholders (government, employers, unions) improved ownership	- Limited early engagement of MTUC weakened initial tripartite balance - Employer resistance, especially in E&E sector, reduced effectiveness of early activities
Systems & Institutional Outputs	Studies (e.g., victim support assessment) informed policy and planning	Institutional readiness and data-sharing constraints on forced labour and child labour not fully addressed in design
Adaptability & Implementation Flexibility	- Reframing from FL/CL to preventive/compliance approach improved engagement - Donor flexibility enabled adjustments - Contextualized delivery (e.g., local language training) improved outcomes	- Approval processes slowed implementation adjustments - Limited forward-looking adaptive strategy⁵⁸

4.3 Efficiency

4.3.1 How efficiently were financial, human and technical resources used?

Human and technical resources

The project was implemented under the Kuala Lumpur Project Office under the oversight and strategic guidance of the ILO Regional Office for Asia and the Pacific (ROAP) Deputy Regional Director. The Project

⁵⁸ A forward-looking adaptive strategy would typically include **predefined scenarios, risk mitigation measures, and decision triggers** that guide when and how the project should pivot.

Office's programmes, including ADVANCE Project, were coordinated through the Regional Programming Services. At the regional-level, technical backstopping of the project was provided by the Senior Regional Specialist on FPRW, who also coordinated knowledge sharing meetings among ESDC-funded projects.

The project had a relatively lean, project-based staffing arrangement, with defined roles that nonetheless required some overlap with regular office functions due to limited resources and the absence of a fully established country office structure.

The Technical Officer assumed both strategic and technical responsibilities, including providing technical guidance, supporting coherence across project components vis-à-vis other ILO projects in Malaysia, and representing the ILO in the UN Country Team. Day-to-day management, stakeholder coordination, and operational oversight were led by the NPC, who was responsible for planning, implementation, fund management, contractor oversight, and engagement with partners. The FAA supported the project and the project office operations on financial and operational processes, including procurement, contract management, financial tracking, and reporting through financial systems such as IRIS, while also managing administrative requirements and office-wide processes. The Technical Officer also established and oversaw the project's monitoring system using PowerBI, although paid licensing and access limitations meant that the NPC and FAA relied on static and MS Excel exported reports rather than interactive use. Project staff collectively handled administrative, procurement, and reporting tasks, often managing multiple contracts and processes simultaneously.

Aside from FPRW, the project also benefitted from the support of other DWT specialists from Bangkok and from HQ, particularly ACTEMP, ACTRAV, and LABADMIN/OSH. There is currently no labour inspection specialist based in DWT Bangkok. Hence, technical inputs on labour inspection had to be coordinated with HQ. Regional and HQ Specialists provided guidance based on ILO approaches, and included global/regional good practices in technical inputs.

Cost-sharing practices, such as sharing staff time across projects, jointly funding travels of technical specialists, and co-funding workshops and outputs, contributed positively to overall project efficiency by optimizing limited resources and reducing duplication. This was particularly important given the project's staffing trajectory: implementation began in 2023 with a temporary NPC, with full-time FAA added in early 2024 and dedicated Technical Officer, joining later in the second half of 2024. As a result, the project operated with constrained human resources during a significant portion of its lifecycle, prioritizing foundational and policy-level work where efficiencies could be maximized through partnerships and shared inputs. While cost-sharing helped sustain delivery and leverage synergies across initiatives, the late expansion of the team, particularly in technical functions, compressed the timeframe available for implementation, contributing to slower progress in outcomes requiring sustained field engagement and institutional follow-through.

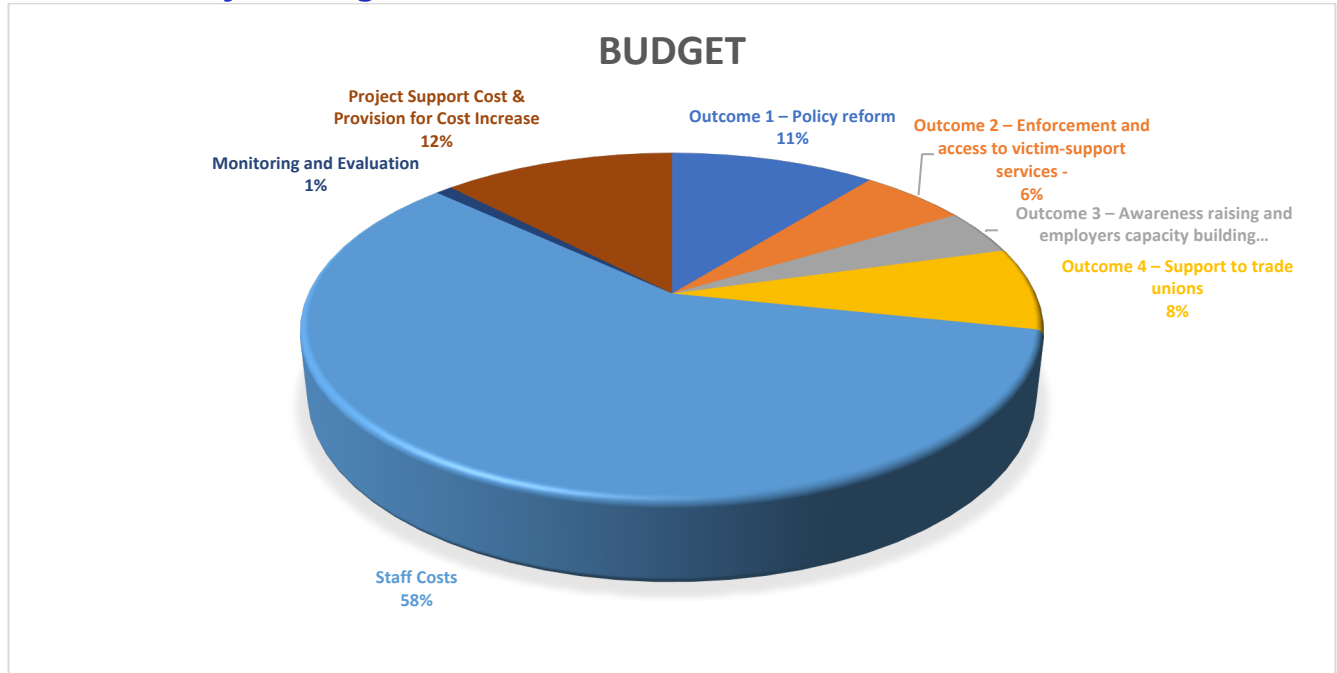
Additionally, while the office staffing arrangement enabled flexibility and close coordination, multiple responsibilities across roles, and high administrative demands had implications for efficiency, particularly in terms of workload distribution, timeliness of processes, and the depth of follow-through on certain activities.

Financial resources

The project underwent several budget revisions over time, reflecting adjustments to its scope, timeline, and resource needs. Initially set at USD 538,976.81 in February 2024, the budget increased slightly to USD 550,232.09 by June 2024, indicating minor cost updates, due to interest earned. A more substantial revision occurred in July 2025, raising the budget to USD 597,771.41, allowing additional allocation to certain budget lines. This same amount was maintained through September and October 2025, with allocations supporting a budget extension until 31 March 2026. The most recent adjustment in March 2026 brought the total budget to USD 603,678.01.

Project staff described financial management as challenging, requiring frequent reallocations and adjustments.⁵⁹ These adjustments increased administrative workload and occasionally delayed activity execution. However, while reallocation is indicative of planning gaps, they also demonstrate the project's responsiveness to evolving implementation needs.

► **Chart 1. Project Budget Allocation**



The budget allocation reflects a project that is strongly driven by human resources and institutional engagement, with over half of the total budget dedicated to staff costs. This suggests a reliance on technical expertise, coordination, and field personnel to deliver results, which is typical for policy and capacity-building initiatives. Project staff consistently remarked that all outputs were under-resourced, with limited budgets for key components such as labour inspection.⁶⁰

Among the programmatic components, Outcome 1 (policy reform) and Outcome 4 (support to trade unions) receive the largest shares, indicating a strategic emphasis on influencing regulatory frameworks and strengthening workers' organizations. Meanwhile, comparatively lower allocations for enforcement, victim-support services, awareness raising, and employers capacity building, may limit the depth and reach of direct interventions, particularly in areas that often require sustained, resource-intensive support.

Additionally, the provisions for project support costs and contingencies demonstrate prudent financial planning. Operational costs remain modest, suggesting efficient management of logistics and administrative expenses. However, the relatively low allocation for monitoring and evaluation, which is for the final internal evaluation is due to limited budget that led to the project staff taking on the M&E tasks as well, which, while increasing efficiency cost-wise could burden staff with additional workload.

► **Table 5. Delivery Rate by Outcome**

⁵⁹ Multiple project respondents.

⁶⁰ Multiple project respondents.

Outcome No.	Description of component/activities / outputs	Delivery Rate as of 18 Mar 2026*
1	Policy reform	100%
2	Labour inspection	35%
	Knowledge sharing system	100%
	Victim support services	100%
3	Communication strategy	66%
	Simplified and translated guide on labour laws (i-ESG)	100%
	Public reporting mechanism	Output dropped
4	Trade union organizing strategy	90% (with committed amount to be fully expended upon payment processing completion)
	Trade unions training and outreach	22% (with committed amount to be fully expended upon payment processing completion)

*Delivery rate is computed based on (Actual Expenditure / Total Budget)*100. **Please note that if all encumbrances (amount committed in the system) are expended, the project is likely to have at least 96% delivery overall.**

The delivery rates, when analysed alongside the budget allocation show a clear divergence between Outcomes. Outcome 1 (Policy reform) achieved 100% delivery, which aligns with its relatively higher allocation and its design as a policy-influencing intervention. As reflected in the project narrative, the project effectively contributed to national frameworks such as the NAPFL 2026–2030 through studies and consultations, with many recommendations already integrated despite delays in formal adoption. This indicates that investments in technical expertise and stakeholder engagement were effective in delivering upstream results. In contrast, delivery for Outcome 2, particularly on the outputs relating to enforcement, was lower. This reflected constraints noted in the narrative, including limited funding, low uptake, and insufficient institutional buy-in for system-level and institutional reforms. Overall however, the project was stronger in policy influence and institutional strengthening.

Cost-sharing practices across projects contributed to overall project efficiency by optimizing available resources and reducing duplication of efforts. These approaches enabled the project to leverage complementary initiatives and maintain momentum despite budget constraints, particularly in delivering policy and knowledge-based outputs. However, while cost-sharing improved financial efficiency, it may also have diluted dedicated attention and resources for more implementation-intensive activities, potentially contributing to slower progress in outcomes requiring sustained and focused engagement.

4.3.2 To what extent did the project build synergies with other initiatives?

The project demonstrated a moderate to high degree of synergy-building, particularly within the ILO ecosystem and with closely aligned partner initiatives. Respondents consistently highlighted effective internal collaboration (“One ILO” approach), with joint activities, shared technical inputs, and cost-sharing arrangements contributing to more efficient use of resources. Synergies with related initiatives such as the RVC Project and ILO Protection of the Rights of Women and Children in Labour Migration (PROTECT) Project, and alignment with national processes like NAPFL enabled the project to scale its influence, avoid duplication, and reinforce policy coherence. These complementarities were especially valuable in policy-oriented outputs, where shared expertise and coordinated engagement strengthened the project’s

contribution to national frameworks. However, these synergies were not without limitations. Differences in project timelines, priorities, and target groups created coordination challenges and, at times, overlap or competition for stakeholders and participants.⁶¹

Moreover, synergies beyond the ILO system remained relatively weak. Engagement with other UN agencies was largely limited to the NAPBHR process, while opportunities to collaborate with key external factors, such as the RBA and the Ministry of Investment, Trade and Industry (MITI), both central to the E&E sector, were not fully leveraged. This constrained the project's ability to deepen industry-level engagement and broaden sectoral influence.

Overall, while synergies enhanced efficiency and strategic alignment, the experience underscores the importance of more structured coordination mechanisms and proactive external partnerships to maximize added value and reduce fragmentation.

4.3.3 How effective were monitoring and data systems?

The project used PowerBI dashboards and contract monitoring system to support reporting and oversight. While this practice reflected an intention to strengthen results-based management, its effectiveness in practice was limited. Access to dashboards was restricted due to paid licensing, with the NPC and FAA relying on static and exported MS Excel reports rather than real-time data, which reduced the system's utility for day-to-day decision-making. For example, the NPC, having the primarily role of project management could benefit from full access to the dynamic system.

On one hand, the donor assessed the project's periodic performance reporting as timely, transparent, and highly useful. Reporting was balanced, providing not only progress updates but also clear articulation of challenges, proposed mitigation measures, and forward-looking direction. This level of transparency supported ESDC in conducting informed assessments of project performance, including considerations of value for money.⁶²

At the activity level, the project applied practical monitoring approaches, including post-training assessments to capture participant feedback and a pre-training assessment for labour inspection and trade unions to inform training design. These efforts indicate a clear intent to use evidence to guide implementation. However, the feedback generated was not consistently integrated back into ongoing programming within the project cycle. Instead, these insights are expected to inform follow-up interventions in the next phase of the project. This limited the project's ability to fully realize efficiency gains through real-time learning and adaptive management, shifting the use of evidence more toward future planning rather than immediate course correction.

► Table 6. Summary of Efficiency Learnings

Category	What Worked Well	What Did Not Work Well
Human Resources	Lean staffing enabled flexibility and close coordination	- Limited staffing in early phase constrained delivery - High workload and role overlap affected depth of follow-through
Technical Capacity	- Access to regional specialists and shared expertise - Strong technical inputs for policy outputs	Technical Officer not 100% technically focused on FPRW, due to cost-sharing arrangements for office-wide roles and some extent was also covering project management role (setting up and managing PowerBI)

⁶¹ Project staff interviewee.

⁶² ESDC interviewee.

Financial Management	- Budget flexibility allowed reallocations and extension - Efficient operational cost management - Cost-sharing reduced duplication	- Budget allocation planning could be improved to lessen need for budget revisions causing additional workloads and delays in the implementation - Programmatic components under-resourced - Shared resources diluted attention to implementation-heavy activities
Partnerships & Synergies	- Strong “One ILO” collaboration - Shared platform through NAPFL shows sign of scaling impact	- Coordination challenges across projects due to different project cycles - Weak engagement with external actors (e.g., MITI, RBA)
Monitoring & Data Systems	- Use of pre- and post-training assessments - Internal handling of M&E reduced cost	- Limited access to PowerBI dashboards, with data used mainly for reporting and not decision-making on project management and resource usage/tracking by NPC and FAA - Feedback from post-training survey not integrated into ongoing programming - Limited depth of evaluation and learning

4.4 Impact Orientation

4.4.1 To what extent has the project contributed to addressing FL and CL?

The project contributed to addressing FL and CL primarily by strengthening the enabling environment for prevention and response, rather than through direct interventions to reduce cases. Its main contributions were at the policy and systems level, including supporting the integration of FL/CL considerations into national frameworks such as the NAPFL and NAPBHR, identifying policy and enforcement gaps, and improving alignment with international standards. In parallel, awareness-raising and capacity-building activities increased understanding of FL/CL risks among key stakeholders, including employers, and workers’ organizations, particularly in the E&E sector. These efforts have helped create the conditions necessary for more effective prevention, detection, and response to labour violations.⁶³

However, there is limited evidence and data at this stage of direct reductions in FL or CL cases due to contribution from the project. This reflects both the project’s focus on upstream interventions and the relatively short timeframe of implementation, as well as the systemic nature of FL/CL issues. While early results suggest improved stakeholder engagement and strengthened compliance efforts, translating these into measurable changes in labour practices will require sustained implementation and follow-through beyond the current project cycle.

4.4.2 How has the project strengthened institutional capacity?

The project contributed to strengthening institutional capacity across key stakeholder groups, with the most notable gains observed in policy development, worker representation, and employer awareness. At the government level, the project supported capacity for policy formulation and coordination, particularly through its contributions to the development of the NAPFL, where stakeholders demonstrated increased ability to engage in evidence-based discussions and align national frameworks with international standards. Trade unions reported enhanced knowledge and skills related to labour rights, collective bargaining, and engagement in policy dialogue, contributing to stronger representation of workers’ interests.⁶⁴ Among employers, the project supported improved awareness of compliance requirements and responsible business practices, and improved the institutional capacity of the MEF design and develop its course offering on ESG. MEF is now promoting, maintaining and managing the course and not the project.

⁶³ Multiple respondents.

⁶⁴ Multiple worker representatives.

It is however noted from the MEF interview that uptake of said ESG course remained uneven.⁶⁵

Despite these achievements, capacity gains in more operational areas, particularly institutional capacity of the labour inspectorate, were more limited. While the project delivered training and provided guidance on the enhancement of labour inspection tools, constraints in design, depth of technical content, and lack of sustained follow-up limited their practical application and longer-term impact. This reflects broader challenges in translating one-off capacity-building activities into institutionalized practices. Overall, the project was effective in strengthening knowledge, awareness, and engagement capacities on the issues of FL and CL, especially at the policy and organizational levels, but less so in building sustained technical and operational capacity, highlighting the need for more continuous, practical-oriented support in future interventions.

4.4.3 What early signs of systemic change exist?

The project contributed to a range of **early and intermediate results** related to stakeholder awareness, relationships, and business practices, particularly within the E&E sector. Respondents highlighted increased awareness among workers and trade unions, with organizations such as MTUC and IndustriALL reporting improved understanding of labour rights and risks related to FL and CL.⁶⁶ The project also helped strengthen relationships among key stakeholders, fostering greater dialogue and collaboration between government, employers, and workers' organizations.⁶⁷

In addition, it contributed to addressing reputational risks for industry actors by promoting responsible business conduct and encouraging the adoption of good practices, particularly through engagement with employers and the introduction of ESG-related tools and frameworks. However, these results have not yet translated into sustainable improved practices at the company level. MEF noted that while awareness has improved, actual implementation of good practices remains limited.⁶⁸

Respondents also emphasized that the project's relatively short timeframe constrained its ability to drive deeper behavioural and institutional change, particularly in areas that require sustained engagement and follow-up.⁶⁹ Overall, the project has made important progress in shaping attitudes, strengthening relationships, and promoting responsible practices, but further time and continued support will be needed to translate these gains into concrete and sustained improvements in workplace practices.

4.5 Sustainability

4.5.1 Likelihood that results will continue after project completion

Sustainability of project results is **moderate**, with stronger where outputs have been embedded in partner-owned platforms or processes: MOHR's NAPFL and communication planning processes, MEF Academy's training platform, and MTUC/union training and campaign tools. Policy-level achievements, particularly those linked to the NAPFL, benefit from strong government ownership and are well-positioned for continuity. These frameworks are embedded within national processes, providing a solid foundation for sustained implementation. However, sustainability remains conditional on continued institutional uptake, follow-up support, resource allocation, and partner capacity to operationalize these outputs beyond the project period.

⁶⁵ Employer representative.

⁶⁶ Stakeholder interviews.

⁶⁷ Multiple respondents.

⁶⁸ Employer representative.

⁶⁹ Multiple respondents.

At the institutional level, key stakeholders such as MEF and MTUC have demonstrated strengthened capacity and commitment, which supports the continuation of project results.

MEF, through platforms such as the MEF Academy, has established a viable channel for ongoing employer engagement and training. The project achieved institutional uptake by MEF through integration of ESG modules into MEF Academy and rollout/promotion in Kuala Lumpur, Johor and Penang. However, enterprise-level uptake remains at an early stage, with initial course participation below expectations,⁷⁰ indicating the need for continued promotion, incentives and follow-up with employers, particularly MSMEs. At the same time, MEF highlighted a limited pool of qualified trainers as a constraint to scaling these efforts, and has proposed paid training models (not necessarily for profit but just to support training costs) as a practical approach to sustain and expand delivery.⁷¹

MTUC also enhanced its capacity for engagement and representation, providing a basis for continued involvement in awareness raising, advocacy, and social dialogue, although further support will be needed to maintain momentum in outreach and organizing activities.⁷²

Sustainability remains more gradual in areas that require sustained technical capacity, resources, and follow-through, including labour inspection system and trade union interventions. These areas were more challenging to fully institutionalize within the project timeframe and budget and will require continued investment and support to consolidate gains.

Importantly, many of the project's results are expected to be carried forward under the DWCP 2026–2030, which provides a structured framework for continuity. Policy and governance-related results, including support to NAPFL and promotion of FPRW, align directly with DWCP Priority 2 on labour rights, social protection, and labour governance, particularly in strengthening alignment with international labour standards and improving enforcement systems.⁷³ In addition, employer engagement and responsible business practices promoted through the project can be further advanced under DWCP outputs related to enterprise compliance practices. The DWCP explicitly emphasizes strengthening institutions of work, improving compliance, and enhancing tripartite engagement, all of which build on the foundations established by the project. This continuity suggests that while the project itself may conclude, its results are not standalone but rather contribute to a broader, longer-term reform trajectory supported by the ILO and national stakeholders through the DWCP.

4.5.2 Which approaches show potential for replication or scaling?

Several approaches demonstrate strong potential for replication and scaling, particularly those that are system-linked, institutionalized, and aligned with existing governance structures. *Policy support models combining evidence generation, technical advisory, and multi-stakeholder consultation* are especially transferable, as seen in contributions to NAPFL and NAPBHR. These approaches are effective because they embed outputs within national processes, ensuring ownership and continuity beyond the project. Similarly, *tripartite and multi-stakeholder engagement mechanisms* offer a replicable model for addressing complex labour issues, as they leverage established platforms for dialogue and consensus-building across government, employers, and workers.

In addition, *platform-based approaches*, such as ESG-oriented employer training through MEF, show strong scaling potential by providing structured and repeatable delivery mechanisms. These are particularly promising where there is a pathway toward institutionalization and cost-recovery (e.g., paid training models

⁷⁰ Project final TPR.

⁷¹ MEF respondent.

⁷² MTUC respondent.

⁷³ DWCP 2026–2030.

as suggested by MEF), which supports sustainability. Overall, approaches that integrate into national systems, build stakeholder ownership, and establish ongoing delivery platforms are the most viable for replication and scaling, while those reliant on project-driven facilitation are less likely to expand without continued external support.

EQ 4.5.3 What factors are critical for sustaining results?

Sustaining project results depends first and foremost on strong policy anchoring and government ownership, which provide the foundation for continuity beyond the project lifecycle. When outputs are embedded within national frameworks such as NAPFL and NAPBHR, they benefit from institutional legitimacy, alignment with national priorities, and a higher likelihood of continued implementation. Closely linked to this is the need for effective institutional coordination and leadership, ensuring that multiple actors across government, employers, and workers remain engaged and that responsibilities for follow-through are clearly defined. Without these, even well-integrated policies risk weak or uneven implementation. According to a government respondent, “Several results from Malaysia’s forced labour action plan and communication plan are likely to be sustained beyond project completion, but their durability depends on institutional commitment, legal reforms, and resource allocation.”⁷⁴

The second critical factor is the availability of adequate financial and human resources, particularly sustained local capacity. Respondents emphasized the importance of sustainable staffing strategy, given the funding constraints for development cooperation projects, and a clearer office structure to support ongoing implementation and stakeholder engagement. While the project operates within the constraints of a project-based office rather than a fully established country office, these limitations can be mitigated through more strategic use of existing arrangements. This includes strengthening role clarity within the team, ensuring continuity through longer-term staffing where possible, and systematically leveraging regional technical support while maintaining consistent local focal points. While cost-sharing approaches improved efficiency, they need to be balanced with dedicated capacity for core functions, to avoid dilution of effort and ensure continuity and depth of implementation.

Finally, sustainability is reinforced by technical depth, system integration, and stakeholder capacity, particularly among social partners. Employers’ and workers’ organizations play a key role in translating policy into practice, yet face constraints that affect sustainability. For example, MEF highlighted challenges such as a limited pool of qualified trainers, low demand for training uptake, and the need for continued follow-up, while broader findings point to the need for stronger technical depth and ongoing engagement. This underscores the importance of moving beyond one-off activities toward institutionalized systems and delivery platforms, supported by continuous capacity-building and clear mechanisms for follow-through.

4.6 Cross-Cutting Issues

Gender Equality and Non-Discrimination

The project demonstrates **intentional but still early-stage efforts** to mainstream gender equality and non-discrimination across its activities. Evidence indicates that gender considerations were integrated in a process-oriented manner, including efforts to ensure balanced participation in activities⁷⁵, the inclusion of gender-related topics in trade unions training⁷⁶, labour inspection training, and ESG training for employers. Gender dimensions were strongly incorporated in policy discussions, particularly within broader frameworks

⁷⁴ Government respondent.

⁷⁵ Project staff respondent.

⁷⁶ Worker representative respondent.

such as NAPFL⁷⁷. These efforts reflect an awareness of gender issues and a commitment to inclusivity at both operational and policy levels.

Social Dialogue

The project demonstrates **strong and deliberate mainstreaming of social dialogue**, positioning it as a central approach to advancing its objectives. Respondents consistently highlighted the project's role in strengthening engagement among government, employers, and workers, with early tripartite consultations and continuous dialogue contributing to improved industrial relations and more inclusive policy processes. Employers' organizations played an active role in shaping and participating in consultations, while trade unions engaged in advocacy and capacity-building, although their participation was sometimes constrained by internal dynamics. The ILO's role as a neutral convenor and "bridge" was a key strength, enabling trust-building and facilitating dialogue across stakeholders who may not otherwise engage as effectively. At the same time, the effectiveness of social dialogue was influenced by structural factors, including uneven sectoral employer engagement and institutional challenges within trade unions, which limited the depth and consistency of participation.

International Labour Standards

The project demonstrates strong alignment with and promotion of ILS, particularly at the policy and awareness levels and on FPRW. Respondents highlighted that ILS were actively promoted through policy support and ESG-related initiatives, reflecting their increasing relevance in the context of global regulatory pressures and responsible business conduct. These efforts contributed to raising awareness and positioning ILS as an important reference point in both policy discussions and employer engagement. However, gaps remain in translating these normative commitments into practical, system-level implementation. In operational areas such as labour inspection, the primary reference point used by DOL in its operation remains national legislation and procedures rather than direct application of ILS, which limits the extent to which international standards are systematically embedded in enforcement practices.

Environmental Sustainability

The project demonstrates initial but limited mainstreaming of environmental sustainability, primarily through its integration into ESG-related initiatives targeting employers. It was noted that environmental considerations were introduced through training modules and discussions on responsible business conduct, particularly in collaboration with MEF, reflecting growing recognition of sustainability issues within the E&E sector. These efforts helped raise awareness and situate environmental sustainability within broader conversations on compliance and supply chain responsibility, aligning with emerging global expectations. However, environmental sustainability was not systematically or deeply integrated across the project's design and implementation.⁷⁸ Beyond ESG-related discussions, there was limited evidence of explicit environmental considerations being embedded in activities, outputs, or outcome-level frameworks.

⁷⁷ Multiple respondents.

⁷⁸ Project staff interviewee.

► 5. Lessons Learned

The following key lessons learnt are especially important for future programming:

- **Alignment with broader programme frameworks strengthens sustainability.** The project experience shows that positioning interventions within the DWCP framework supports stronger alignment with national priorities, continuity beyond project cycles, and clearer pathways for scaling.
- **Integration into national systems enhances ownership and uptake.** The project demonstrated that aligning outputs with national frameworks (e.g., NAPFL, NAPBHR) contributes to stronger institutional ownership and increases the likelihood of sustained implementation.
- **Early and continuous donor engagement enhances alignment and proactive risk management.** The project experience underscores the importance of engaging ESDC at the design stage and maintaining continuous coordination throughout implementation to ensure alignment with donor priorities, ILO frameworks, and stakeholder needs.
- **System-based approaches are more sustainable than standalone activities.** Evidence from the project indicates that one-off trainings and outputs have limited lasting impact, while approaches linked to institutional systems and follow-up mechanisms are more likely to be sustained.
- **Efficiency gains require a balance with dedicated capacity.** The project showed that while cost-sharing and lean staffing can improve efficiency, insufficient dedicated human and technical resources available at the early stage of the project affected implementation.
- **Use of data for adaptive management remains a critical gap.** While monitoring tools and feedback mechanisms were in place, due to licensing limitations, the static reports were generated from the system by the Technical Officer and the system was not dynamically used by the NPC and FAA roles for their daily functions.
- **Stakeholder engagement and framing influence participation.** Initial resistance from some stakeholders demonstrated that framing and early engagement approaches significantly affect buy-in, particularly when addressing sensitive issues such as forced labour.
- **Policy outputs require clear operational follow-through to translate into practice.** The project highlighted that policy achievements alone do not ensure implementation, particularly in the absence of clearly defined responsibilities, resources, and operational guidance.
- **Project duration affects depth of institutional change.** The relatively short implementation period limited the extent to which systems and practices could be fully institutionalized, particularly for complex reforms.
- **Synergies enhance efficiency but require systematic coordination.** Collaboration across initiatives supported efficiency and scale, though coordination challenges affected consistency and stakeholder engagement. The design should also consider existing projects and determine synergies in advance or during inception.
- **Awareness does not automatically translate into uptake.** The project experience shows that increased awareness among employers did not consistently lead to implementation of practices, reflecting the importance of demand-side factors such as incentives, capacity, and follow-up.
- **Proactive risk management is critical in fast-evolving trade contexts.** The project experience highlights that rapidly changing trade dynamics can significantly affect project relevance, stakeholder engagement, and implementation pathways. Early identification of contextual and operational risks enables timely development of mitigation strategies and adaptive responses.

► 6. Conclusions

The ADVANCE project is assessed as **highly relevant and strategically aligned**, with a coherent design that effectively responded to national priorities, stakeholder needs, and evolving global expectations on labour standards. The project successfully positioned itself within key national policy processes, particularly the NAPFL, NAPBHR and contributed to strengthening the enabling environment for addressing forced labour and child labour. Its systems-oriented approach linking policy reform, institutional capacity, awareness raising, and social dialogue was conceptually sound and aligned with international good practice. However, some limitations in early stakeholder consultation, articulation of assumptions, and risk mitigation affected initial coherence and engagement, requiring adaptive adjustments during implementation.

In terms of effectiveness, the project achieved **moderate to high results overall**, with stronger performance at the policy and awareness levels than in operational and system-level implementation. It made meaningful contributions to policy development, stakeholder engagement, and awareness of forced labour and child labour risks, particularly within the E&E sector. At the same time, outcomes requiring sustained technical engagement such as labour inspection institutional capacity, communication strategies, and trade union institutional strengthening progressed more slowly and remain at early stages of completion by the time of evaluation. This reflects both resource constraints and the inherent complexity of translating knowledge and policy gains into behavioural and institutional change within a relatively short timeframe.

From an efficiency perspective, the project demonstrated **efficient use of limited resources**, supported by cost-sharing, strong partnerships, and a lean staffing model. These approaches enabled delivery of key outputs and enhanced policy-level impact despite constraints. However, limited in-country technical capacity particularly in the early phase and high workload distribution affected the depth of follow-through on implementation-intensive activities. Financial allocation patterns and delivery rates further confirm that the project was more effective in upstream, policy-oriented outputs than in downstream operational components. Monitoring systems and feedback mechanisms were in place but underutilized for adaptive management, limiting opportunities to enhance efficiency through real-time learning.

The project's **impact orientation is evident in its contributions to strengthening the enabling environment**, including improved policy coherence, increased stakeholder awareness, and enhanced dialogue among key actors. Early signs of systemic change include stronger engagement across tripartite partners and other stakeholders, increased recognition of labour risks within supply chains, and improved alignment with ILS. However, these results remain largely preparatory, with limited evidence of direct reductions in FL or CL cases at this stage. This is consistent with the project's upstream focus and the systemic nature of the issues addressed, which require longer-term interventions to achieve measurable changes in practice.

Sustainability prospects are **moderate, with stronger likelihood of continuation for policy-level and institutional results**, particularly those embedded within national frameworks and supported by stakeholder ownership. Platforms such as MEF Academy and strengthened trade union engagement provide additional pathways for continuity. Nonetheless, sustainability is more uncertain for technical and implementation-focused outputs that require sustained capacity, resources, and follow-up. The project's relatively short duration and phased staffing also limited the extent to which systems could be fully institutionalized. Importantly, many results are expected to be carried forward under the DWCP 2026–2030, which provides a structured framework for consolidation and scaling of achievements .

In conclusion, the ADVANCE project has made a **valuable and timely contribution** to advancing FPRW in Malaysia, particularly by strengthening policy frameworks, stakeholder engagement, and awareness on forced and child labour. Its greatest strengths lie in its strategic alignment, adaptive implementation, and

ability to convene diverse stakeholders around complex issues. At the same time, the evaluation highlights the importance of sustained engagement, stronger operational capacity, and deeper system integration to translate these gains into lasting impact. The project has laid a solid foundation for future programming, and its results are well-positioned to be further developed and scaled within longer-term national and ILO frameworks.

► 7. Recommendations

A. Strategic Recommendations

1. Adopt longer-term, programmatic approaches anchored in the DWCP

Future interventions should be designed as multi-phase or longer-term programmes, explicitly aligned with the DWCP, to allow sufficient time for institutionalization, behavioural change, and system strengthening. Short project cycles limited the depth and sustainability of results, particularly for enforcement and capacity-building components.

Priority: High

2. Apart from alignment with DWCP, also strengthen alignment with evolving donor strategic frameworks and reporting requirements. Future projects should systematically align design, implementation, and reporting with emerging donor strategies such as Canada's Indo-Pacific Strategy (IPS), particularly its focus on supply chain resilience. This includes integrating specific indicators and reporting mechanisms that enable timely tracking of contributions to strategic objectives. Projects could also draw on available donor planning frameworks, such as ESDC's Departmental Plan and Labour Funding Programme guidance, to ensure coherence with donor priorities, enhance accountability, and facilitate more effective performance reporting.

Priority: High

3. Ensure stronger integration between policy support and implementation pathways and leverage on national institutions

ILO and donors should support interventions that combine policy development with funded implementation mechanisms (e.g. NAPFL having a clear resource plan), including operational plans, institutional responsibilities, and follow-up resources. This will help bridge the gap observed between strong policy outcomes and weaker operational delivery. Additionally, projects should utilize national institutions such as the National Labour Advisory Committee as a strategic platform for policy engagement, knowledge sharing and dialogue.⁷⁹

Priority: High

4. Explore sustainable staffing models that balance technical quality, national ownership, and resource allocation

The project experience indicates that early technical expertise supports design quality and technical rigor during implementation, while stronger reliance on national staff enhances ownership and stakeholder engagement. The ADVANCE experience shows that the Technical Officer made a significant contribution by providing technical oversight on FPRW, forced labour and child labour, promoting coherence across ILO initiatives, and supporting ILO representation in UNCT processes. However, simultaneous functions create workload pressures and may limit the depth of follow-through in specialized areas. ILO should therefore

⁷⁹ Recommendation by MEF during the evaluation validation workshop.

consider mapping technical and coordination needs across all Malaysia projects and identifying which functions require dedicated in-country capacity, which can be supported through regional or HQ specialists, and which require shared or pooled resourcing. A sustainable approach, in particular within the context of funding constraints, is to ensure technical functions are effectively embedded within national technical staff. Cost-sharing arrangements can remain useful, but they should be supported by clear role definitions, predictable technical backstopping arrangements, and adequate operational budgets. This would help ensure that ILO maintains strong country-level visibility and coordination while also providing sustained technical support on forced labour, child labour and related labour governance priorities.

Priority: High

B. Programming and Design Recommendations

5. Strengthen in-country technical capacity and staffing from the outset

Future projects should ensure clearer staffing structures and early onboarding of staff, and sustained technical support, including leveraging regional expertise where needed. Consideration should also be given to follow-up phases or transition strategies to consolidate gains and ensure continuity of results beyond the project lifecycle.

Priority: High

6. Strengthen data systems and monitoring on forced labour and child labour, aligned with national frameworks

Future programming should prioritize the development and institutionalization of integrated, centralized, and transparent data systems for monitoring forced labour and child labour. These systems are critical to support evidence-based enforcement, policy development, and tracking of compliance with labour laws, including Employment Act and the Children and Young Persons (Employment) Act in relation to child labour.

Efforts should be closely aligned with relevant national frameworks, particularly the proposed NAPFL, to ensure coherence, government ownership, and sustainability. Strengthened data systems will be essential for monitoring progress in the implementation of the NAPFL and improving coordination, data sharing, and enforcement planning across agencies, supported by enhanced capacity to use data tools and analytics.

Priority: High

7. Establish strategic and systemic approaches to labour inspection and enforcement

Future phases should strengthen labour inspection systems through SCP, enabling a shift from reactive enforcement to targeted, risk-based, and sector-focused approaches addressing child labour, forced labour, and OSH. SCP should define shared performance objectives, strengthen coordination with tripartite partners, and prioritize high-risk sectors. It should also generate a practical, resource-sensitive enforcement plan designed to achieve impact beyond individual enterprises toward systemic change.

To support this, labour inspectorates require practical tools, operational training, and sustained institutional support. Adequate and predictable funding is essential, as such systemic reforms were not feasible under the current project.

Priority: High

8. Strengthen sustained engagement strategies for employers and workers

Future interventions for employers should include early mapping of entry points, and linking labour standards to business drivers such as ESG, supply chain requirements, and reputational risk, while also addressing barriers faced by MSMEs. Continued support for the MEF ESG course promotion, including

access to ILO technical expertise and resource speakers, should be maintained by the ILO. For workers, this includes supporting MTUC's role in coordinating engagement with broader trade union movement, enhancing understanding of emerging areas such as responsible business conduct and human rights due diligence, and enabling more active participation in tripartite and policy processes.

Capacity-building should move beyond one-off activities toward institutionalized training systems, structured follow-up, and practical application.

Priority: High

9. Strengthen supply chain-based approaches to drive labour standards compliance

Future interventions should adopt a more explicit supply chain approach, engaging lead firms, buyers, and industry actors to drive compliance across tiers of production. The project experience shows that ESG-focused approaches alone are not sufficient to generate widespread change, particularly among smaller firms. Leveraging supply chain dynamics can create stronger incentives for compliance, linking labour standards to market access, buyer requirements, and reputational considerations, while also enabling cascading support to suppliers. This approach can enhance both scale and sustainability of interventions, particularly in export-oriented sectors.

Priority: High

10. Strengthen targeted and practical support for MSMEs

Future interventions should include more tailored and practical support for MSMEs, recognizing their specific constraints in awareness, capacity, and resources. Respondents mentioned that MSMEs often have limited understanding of labour standards and face challenges in implementation, resulting in low uptake of training and tools. Interventions should therefore emphasize simplified guidance, hands-on support, and sustained follow-up, delivered through employer organizations and sector platforms, to enable gradual and practical adoption of compliance measures.

Priority: High

11. Strengthen monitoring systems for adaptive management

Monitoring systems should support real-time decision-making, including wider access to tools (e.g., dashboards), systematic use of feedback, and integration of learning into ongoing programming rather than future phases only.

Priority: High

12. Enhance stakeholder engagement and adopt more flexible sectoral approaches

Future interventions should ensure early and continuous engagement of all tripartite partners, including workers' organizations, and consider multi-sector or hybrid approaches to improve relevance, participation, and scalability.

Priority: Medium

13. Strengthen external partnerships and coordination mechanisms

ILO should enhance collaboration with key external actors (e.g., industry bodies, relevant ministries including MITI, UN agencies and others engaged on NSS) through more structured coordination mechanisms to maximize synergies and expand impact beyond the ILO system.

Priority: Medium

14. Strengthen integration of cross-cutting issues into implementation

Future programming should deepen the integration of gender equality, non-discrimination, and environmental sustainability, moving beyond awareness and participation toward measurable outcomes and operational integration.

Priority: Medium

► Annex 1 – Rating Scale

Relevance & Coherence

High: Project objectives and design are strongly aligned with national priorities and stakeholder needs, with a clear and coherent theory of change that is widely accepted and requires **minimal** adjustment during implementation.

Moderate: Project is generally aligned with national priorities and stakeholder needs, with a sound design, but some gaps in consultation, assumptions, or coherence require **substantive** adjustments during implementation.

Low: Project shows weak alignment with national priorities or stakeholder needs, with unclear or inconsistent design logic and significant mismatches between intended interventions and actual context.

Effectiveness

High: Most or all intended outputs and outcomes are achieved, including both policy-level and operational results, with clear evidence of uptake, behaviour change, and institutionalization.

Moderate: Key outputs and some outcomes are achieved, particularly at policy or awareness levels, but results are uneven, with limited progress in implementation, institutionalization, or behaviour change.

Low: Few intended outputs and outcomes are achieved, with limited evidence of uptake or change, and major components of the project remain unimplemented or ineffective.

Efficiency

High: Resources (financial, human, technical) are used optimally, with timely delivery, strong coordination, minimal delays, and high output-to-resource ratio across all components.

Moderate: Resources are generally used well, with some efficiencies achieved (e.g., partnerships, cost-sharing), but constrained by delays, capacity limitations, or uneven resource allocation across outputs.

Low: Significant inefficiencies in resource use, including delays, poor coordination, underutilization of systems, or high costs relative to outputs delivered.

Impact Orientation

High: Clear evidence of significant and sustained changes (e.g., reduced FL/CL cases, improved enforcement, behavioural change), with strong pathways to long-term impact already visible.

Moderate: Evidence of early or intermediate changes (e.g., improved awareness, policy adoption, strengthened relationships), but limited evidence of sustained or systemic impact within the project period.

Low: Little to no evidence of change beyond immediate outputs, with weak or unclear contribution to longer-term outcomes or impact.

Sustainability

High: Results are highly likely to be sustained, with strong national ownership, institutionalization, adequate capacity, and secured resources for continuation or scaling.

Moderate: Some results (particularly policy-level or institutional platforms) are likely to be sustained, but others depend on continued external support, resources, or capacity strengthening.

Low: Results are unlikely to be sustained due to weak ownership, limited capacity, lack of resources, or absence of institutional mechanisms to continue activities.

Cross-cutting Issues

High: Cross-cutting issues (gender, social dialogue, ILS, environment) are fully integrated into design and implementation, with clear evidence of outcomes and systematic application across components.

Moderate: Cross-cutting issues are integrated in design and processes (e.g., participation, policy discussions), but with limited evidence of deeper or sustained outcomes.

Low: Cross-cutting issues are minimally addressed or treated as add-ons, with little integration into core activities or results.

► Annex 2 – Evaluation Questions

Relevance, Coherence and Validity of Design

- To what extent did the project's objectives, strategies, and theory of change respond to the priority needs and expectations of ILO constituents, beneficiaries, and key partners, and how have these needs evolved during implementation?
- How well did the project align with national development priorities and relevant policy frameworks, and were key stakeholders adequately consulted during design?
- How coherent and sound was the project's logic (objectives, outcomes, strategies), and which design elements should be retained or revised in a successor project?

Effectiveness

- To what extent did the project achieve its intended outcomes and outputs, and which components performed better or worse than others, and why?
- What key internal and external factors facilitated or constrained progress toward results across different outcomes?
- How effectively did the project adapt to emerging challenges and stakeholder needs during implementation, and what adaptive practices should be continued and/or institutionalized going forward?

Efficiency

- ▶ How efficiently were financial, human, and technical resources used to achieve results, in terms of cost, time, and management arrangements?
- ▶ To what extent did the project build synergies with other ILO, UN, donor-funded, or national initiatives, and how did this affect efficiency?
- ▶ How effective were the project's monitoring and data systems in supporting evidence-based decision-making and adaptive management?

Impact Orientation

- ▶ To what extent has the project contributed to impacts in addressing forced and child labour in the E&E sector?
- ▶ How has the project strengthened the institutional capacity of government and employers' and workers' organizations to prevent and address forced and child labour?
- ▶ What early signs of systemic or behavioural change suggest potential for sustained impact beyond the project's lifespan?

Sustainability

- ▶ To what extent are the project's key results likely to be sustained by national partners after external support ends, and why?
- ▶ Which strategies, approaches, or institutional arrangements show the strongest potential for replication or scaling up?
- ▶ What factors (policy, institutional, financial, capacity-related) are most critical for sustaining results, and how can a new project strengthen them?

Cross-cutting Issues

- ▶ How effectively were gender equality and non-discrimination integrated into project design, implementation, and results related to forced and child labour?
- ▶ How and to what effect did the project engage workers' and employers' organizations through social dialogue mechanisms, and what factors influenced the depth, quality, and sustainability of their participation?
- ▶ How effectively were international labour standards translated from normative commitments into operational practices across project components, and what gaps between standards and implementation limited results?
- ▶ Were any environmental sustainability considerations relevant to the E&E sector taken into account in the design and implementation of the project, and if so, how?