

**EVALUATION
of the
NATIONAL STRATEGY TO PREVENT AND
COMBAT TRAFFICKING IN HUMAN BEINGS
OF THE REPUBLIC OF MOLDOVA
2018-2023**

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The opinions expressed herein are those of the author and do not necessarily reflect the views of the International Centre “La Strada” or Oxfam GB.

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List of acronyms

ANAS	National Agency for Social Assistance of the Republic of Moldova
CAP	Chisinau Centre for Protection and Assistance of Victims and Potential Victims of Trafficking in Human Beings
CCTiP	Centre for Combating Trafficking in Persons under the General Inspectorate of Police of the Ministry of Interior of the Republic of Moldova
CoE	Council of Europe
COVID-19	New coronavirus identified in 2019
CT	Counter-trafficking
EU	European Union
GoRM	Government of the Republic of Moldova
GPO	General Prosecutor's Office of the Republic of Moldova
GRETA	Council of Europe Group of Experts on Action against Trafficking in Human Beings
IOM	International Organization for Migration
MDT	Multidisciplinary team
MLSP	Ministry of Labour and Social Protection of the Republic of Moldova
NAP	National Action Plan
NCCTHB	National Committee for Combating Trafficking in Human Beings
NRMV	National Referral Mechanism for Victims of Crime
NRS	National Referral System for Victims and Potential Victims of Trafficking in Human Beings
OECD	Organisation for Economic Co-operation and Development
OSCE	Organisation for Co-operation and Security in Europe
PCCOCS	Prosecutor's Office for Combating Organized Crime and Special Cases
SMART	Specific, Measurable, Achievable, Relevant, Time-bound
TC THB	Territorial Commissions for Combating Trafficking in Human Beings
TCN	Third-country national
THB	Trafficking in Human Beings
UN	United Nations

1. Executive Summary

The National Strategy to Prevent and Combat Trafficking in Human Beings for 2018-2023 was approved by the Government of the Republic of Moldova Decision No.461/2018, and the two National Action Plans on its implementation, for 2018-2020 and for 2021-2022, by the Government Decisions No.461/2018 and No.319/2021 respectively. In line with clause 4 of the Government Decision No.386/2020 introducing a new Regulation on planning, development, approval, implementation, monitoring, and evaluation of public policy documents, the Strategy and Plan 2021-2022 expired in July 2022.

The new Regulation (paragraph 57) stipulates that after the expiration of the implementation period of a public policy document, a final evaluation should be carried out to assess objectively the current conditions in the target area, using the following criteria:

- 1) **relevance** – the extent to which the public policy was suited to the country needs;
- 2) **effectiveness** – the degree of achievement of the set goals;
- 3) **efficiency** – the method of using the allocated budget funds;
- 4) **sustainability** – the ability to have long-term performance;
- 5) **impact** – the positive and negative changes produced by the public policy document.

Per paragraph 58 of the Regulation, such an evaluation can be external and conducted by an independent entity sub-contracted by the central public authority responsible for the evaluation, or by development partners, in line with the procedures established by the relevant policy document and on the basis of the monitoring reports prepared during its implementation.

The International Centre “La Strada”, within the framework of its project “*Strengthening the national counter-trafficking and gender-based violence response in the Republic of Moldova in the context of armed conflict in Ukraine*” funded by Oxfam Great Britain, is supporting the Government of Moldova in conducting an independent final evaluation of the National Strategy to Prevent and Combat Trafficking in Human Beings for 2018-2023 and its two National Action Plans.

The present report summarizes the results of the evaluation in five sections:

Section 1. Executive Summary describes the purpose and objectives of the Strategy, the results of its implementation, and the main conclusions and recommendations.

Section 2. Introduction summarized the Strategy, the purpose and methods of the evaluation, as well as the limitations of the exercise.

Section 3. Results discusses in detail the findings of the evaluation in line with the criteria of relevance, effectiveness, efficiency, sustainability, and impact, as well as an additional criterium of **coherence**, recommended by the Organisation for Economic Co-operation and Development.

Section 4. Conclusions presents the key conclusions of the evaluation.

Section 5. Recommendations provides a list of suggested actions to improve the anti-trafficking response and policy development in future.

In addition, there are five **annexes** providing additional details on the evaluation and its results.

The evaluation has found that the Strategy and National Action Plans have constituted a significant improvement over the previous policy documents in the counter-trafficking sphere and been appreciated by the stakeholders as important instruments for the mobilization and consolidation of effort, ensuring transparency, and directing the engagement with development partners and international donors. At the same time, the design of the Strategy could be further enhanced, including but not limited to its scope

and intervention logic, monitoring and evaluation system, coherence with other concurrent policies, as well as incorporation of the perspectives of the final beneficiaries and local level actors and of cross-cutting issues. Useful outputs have been produced across all areas of the Strategy and contributed to progress towards a majority of expected outcomes. Yet, despite clear achievements, most of the problems described in the Strategy continue to be unresolved upon its expiry, either due to their systemic nature, insufficiency of the planned and implemented efforts, changed circumstances, or external factors. The new coronavirus pandemic and the multiple crises arising from the Russian full-scale invasion of Ukraine, along with the ongoing administrative reforms, high staff turnover in key governmental agencies, and a lack of resources, have negatively affected the Strategy/National Action Plans' implementation and results.

The findings of the evaluation suggest a continued need for a distinct policy document on preventing and combating trafficking in human beings in Moldova to maintain the level of stakeholder engagement, sustain current achievements, respond to the current challenges, and move forward with addressing pending issues. The European Union integration processes along with the close scrutiny of the government's response to trafficking in human beings provide an enabling environment for the formulation and implementation of a new policy document. Recommendations for its design and priorities are provided based on the current context, international recommendations, and lessons learned.

2. Introduction

2.1 Background¹

2.1.1 Overview of the trafficking situation in Moldova

Moldova is one of Europe's poorest countries.² Despite its progress in reducing poverty and promoting growth, the country continues to rely heavily on remittances from its citizens working abroad³ to sustain private consumption, one of the key drivers of economic growth.⁴ According to the latest available assessment, an estimated 41% of Moldovan households had someone in their extended family who was working abroad.⁵ With such a considerable rate of external labor migration, together with the readiness to accept unsafe overseas employment offers, the risks of trafficking in human beings (THB) for Moldovans are significant, with some 6% Moldovan households reporting at least one family member who had been presumably trafficked and exploited abroad in 2018-19 (compared to estimated 2% in 2014-17), according to the latest available estimates.⁶ In terms of percentage of population, the country is assessed to be the most affected by THB in the European Union's (EU) Eastern Partnership region.⁷ The number of known victims of THB has been fluctuating over the years, subject to a variety of external and internal factors.

Overall, Moldovan men, women, girls, and boys are known to have been subjected to sexual and non-sexual forms of exploitation, primarily abroad but also domestically. Trafficking for forced labour has been the prevalent form of this crime over the past several years, followed by trafficking for sexual exploitation.⁸ Many victims come from rural areas and have low levels of education;⁹ an increasing number of victims referred to service providers for assistance experience multiple vulnerabilities (e.g. homelessness, substance abuse, mental health issues, unemployment, sexual and domestic violence, lack of identity documents, etc.).¹⁰ New forms of trafficking and exploitation are constantly emerging and require continuous adjustment in the counter-trafficking (CT) response.

2.1.2 Overview of the government response

Preventing and combating THB has been a priority for the Government of the Republic of Moldova (GoRM), civil society, development partners, and international donors and observers over the past two decades. The country has made significant progress in all areas of counter-trafficking (the so-called "4Ps" of CT response), i.e. protection of victims, prosecution of traffickers, prevention of trafficking and related phenomena, and fostering partnerships among a variety of actors at all levels.

¹ Parts of this section were adopted, in an updated version, from the previous work of the author. See Antonova H., Assessment of the capacity of the Directorate of Permanent Secretariats of the State Chancellery of the Republic of Moldova to coordinate counter-trafficking policies and of the feasibility of the introduction of a National Rapporteur on Combating Trafficking in Human Beings in Moldova, IOM, 2020. Access: <https://moldova.iom.int/sites/g/files/tmzbdl266/files/2020-10/FINAL%20Report.pdf>

² <https://www.worldbank.org/en/country/moldova/overview#1>

³ The current population of Moldova is 2.64 million (Ibidem)

⁴ <https://www.worldbank.org/en/country/moldova/overview#3>

⁵ Human Trafficking Survey: Belarus, Georgia, Moldova, and Ukraine. IOM and Info Sapiens, 2019, p.3

⁶ Ibid., p.3

⁷ Human Trafficking Survey: Belarus, Georgia, Moldova, and Ukraine. IOM and Info Sapiens, 2019, p.3

⁸ Data provided by the IOM Mission in Moldova; Group of Experts on Action against Trafficking in Human Beings (GRETA) Evaluation Report: Republic of Moldova. Third Evaluation Report: Access to Justice and Effective Remedies for Victims of Trafficking in Human Beings. GRETA(2020), p.8, (access: <https://rm.coe.int/greta-2020-11-fgr-mda-en/1680a09538>)

⁹ Trafficking in Persons Report. US Department of State, 2019, p.331. Access: <https://www.state.gov/wp-content/uploads/2019/06/2019-Trafficking-in-Persons-Report.pdf>

¹⁰ Interviews with stakeholders

In 2005, the GoRM ratified the United Nations (UN) Convention against Transnational Organized Crime and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children supplementing it (Palermo Protocol), and in 2006 - the Council of Europe (CoE) Convention on Action against THB. Other relevant conventions in this sphere ratified by the Republic of Moldova include Convention on the Rights of the Child (1993) and its two Optional Protocols (rat. 2004 and 2007); Convention on the Elimination of All Forms of Discrimination against Women (rat. 1994); Forced Labour Convention (rat. 2000); Worst Forms of Child Labour Convention (rat. 2002); Convention on the Rights of Persons with Disabilities (rat. 2010); CoE Convention on preventing and combating violence against women and domestic violence (rat. 2022), CoE Convention against Trafficking in Human Organs (rat. 2017), CoE Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (rat. 2012), European Convention on Mutual Assistance in Criminal Matters (rat. 1998), and others.

In June 2014, the Republic of Moldova signed an Association Agreement with the EU, which came into full effect in July 2016.¹¹ The ensuing Recommendations on the Association Agenda,¹² *inter alia*, prompted the GoRM to approve and implement a six-year national strategy for preventing and combating THB for 2018-2023, as well as to strengthen co-ordination, monitoring and reporting mechanisms and capacities both at political and administrative level.

The GoRM has continuously worked to reflect its international commitments in the national legislative framework.

While its main strategic document, the National Development Strategy “Moldova 2020”,¹³ did not mention THB, the current draft of the new “Moldova 2030” includes elimination of THB under two of its ten strategic goals,¹⁴ with a specific target for the reduction in the number of victims per 100,000 of population.

THB has been defined and criminalized in Moldova’s Criminal Code since the early 2000s (Article 165 of the Criminal Code); and trafficking in children as early as 1997 (Article 206 of the Criminal Code). The Code contains a number of other articles criminalising activities related to or commonly associated with THB, such as using the results of work or services of a person who is a victim of THB (Article 165¹), slavery and conditions similar to slavery (Article 167), forced labor (Article 168), illegal removal of a child from the country (Article 207), use of child prostitution (Article 208²), pimping (Article 220), advertising for the purpose of illegally obtaining or donating human organs, tissues, and cells (Article 213¹), trafficking in human organs (Article 158), organising begging (Article 302), and organising irregular migration (Article 362¹).¹⁵ A comprehensive Law No. 241/2005 on Preventing and Combating THB has been in place since October 2005 and regularly updated to reflect the new THB trends and outcomes of government reforms. The Law governs all aspects of CT response, including prevention of THB, prosecution of traffickers, protection of victims, and partnership, cooperation, and coordination among stakeholders, both domestically and across borders.

¹¹ https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/moldova_en

¹² <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=OJ:L:2017:215:FULL&from=EN>

¹³ Outlines GoRM’s priorities and commitments with regard to the implementation of the Sustainable Development Goals

¹⁴ 3. Improvement of Labor Conditions and Decreasing Informal Employment and 9. Promotion of Peaceful, Safe, and Inclusive Society

¹⁵ National Strategy on Preventing and Combating Trafficking in Human Beings for the Years 2018-2023. Annex No.1 to the Government Decision No.461 of 22 May 2018, p.3

A comprehensive institutional framework was established encompassing inclusive coordination structures, specialized and non-specialised actors and service providers, civil society organizations, and development partners. Some of its core elements include:

- The high-level National Committee for Combating THB (NCCTHB) is a consultative body to the GoRM tasked with the overall coordination of CT policies. The composition and functioning of the NCCTHB are regulated by the Government Decision No.472/2008 on the Approval of the Composition of the NCCTHB and of the Regulation on NCCTHB. The Committee is chaired by the Minister of Foreign Affairs and European Integration, with the Ministers of Interior and of Labor, and Social Policy acting as deputy chairs, and its members are heads of executive public authorities, including law enforcement agencies and other organizations involved in CT work.
- The operation of the NCCTHB was ensured by its Permanent Secretariat established within the State Chancellery that also had acted as the *de facto* national CT coordinator.¹⁶ In September 2018, through the Government Decision No.915/2018, the Secretariat was merged with two other similar structures responsible for the coordination of policies in the spheres of children's rights protection and collective bargaining, to form a Directorate of Permanent Secretariats, which in 2020, was reformed into the Directorate for Coordination in the Field of Human Rights and Social Dialogue.¹⁷ The Head of the Directorate was appointed Secretary to three governmental consultative bodies, including the NCCTHB;
- At the local level, CT policy is coordinated by the Territorial Commissions for Combating THB (TC THB) established and operating in line with the Government Decision No. 234/2008 on the approval of the Standard Regulation on Territorial Commissions for Combating THB. The level of operation and capacities of such commissions is uneven across the country;¹⁸
- the National Coordination Unit within the Ministry of Labor and Social Protection (MLSP) coordinating a network of territorial multidisciplinary teams (MDTs) that operate on the basis of the Government Decision No.228/2014), which together form the National Referral System (NRS), the mechanism for the provision of direct assistance to victims and potential victims of THB in place throughout 2018-21;¹⁹
- the Law Enforcement Coordination Council chaired by the General Prosecutor's Office (GPO);
- specialized law enforcement agencies (Center for Combating Trafficking in Persons (CCTiP), GPO Section for Combating THB, etc);
- a specialized Centre for Protection and Assistance of Victims and Potential Victims of THB (CAP) in Chisinau, along with other residential programs available for victims/presumed victims of THB in Causeni, Drochia, Cahul, and Hincesti.
- Several specialized hotlines operated by a variety of governmental and non-governmental actors, most prominent among them the Hotline 080077777 operated by La Strada.

Six comprehensive National Action Plans (NAP) on preventing and combating THB were implemented between 2001 and 2016. Between 2009 and 2016, the Strategy on the National Referral System for the Protection of and Assistance to Victims and Potential Victims of THB approved by the Parliament Decision No. 257/2008 was implemented. THB was also included as a priority in the National Human Rights Action Plan for 2018-2020 adopted by the Government Decision No.89/2018.²⁰

¹⁶ For more on this, see Antonova (2020)

¹⁷ Government Decision No.763/2020. Access: https://www.legis.md/cautare/getResults?doc_id=123641&lang=ru

¹⁸ Ibidem.

¹⁹ This mechanism is now being replaced with the National Referral Mechanism for Victims of Crime, as discussed elsewhere in this report.

²⁰ https://www.legis.md/cautare/getResults?doc_id=110031&lang=ro

2.1.3 Overview of the National Strategy for Preventing and Combating THB for 2018-2023

Following the Recommendations on the Association Agenda and the provisions of the National Action Plan for the Implementation of the EU-Moldova Association Agreement for 2017-2019, in May 2018, the GoRM adopted the National Strategy on Preventing and Combating THB for 2018-2023 to, *inter alia*:

1. *respond to the commitments of the Government of the Republic of Moldova, assumed by the ratification of international instruments, on the effective prevention and combating of THB, in order to respect citizens' rights to a safe life;*
2. *ensure continuity of the state policy on reforming the national and transnational cooperation between governmental, non-governmental and intergovernmental organisations to implement measures aimed at preventing and combating THB in order to promote the rights of victims and presumed victims of THB, and gender equality;*
3. *contribute to the implementation of the 2017-2019 National Action Plan implementing the Republic of Moldova-EU Association Agreement and the 2018-2022 National Human Rights Action Plan.*²¹

The overall aim of the Strategy is **sustainable development of the national system for preventing and combating THB through the 4P paradigm.**

The Strategy identifies issues (gaps, needs) and guides the relevant interventions in **five general areas and 15 sub-areas**, as follows:

- (1) General Support Measures:** 1.1 Coordination of action; 1.2 Legal and regulatory framework; 1.3 Capacity building; 1.4. Collection and analysis of statistical data, researches; 1.5 Effective management of financial resources;
- (2) Prevention of THB:** 2.1 Awareness raising; 2.2 Reducing vulnerability; 2.3 Administrative control;
- (3) Social assistance and protection of victims and presumed victims of THB:** 3.1. Identification and referral of victims and presumed victims of THB; 3.2. Repatriation; 3.3. Rehabilitation and reintegration of victims and presumed victims of THB;
- (4) Prosecution:** 4.1. Criminal prosecution and trials; 4.2. Protection of victims and witnesses in criminal proceedings; 4.3. Restoring the rights of victims of THB and granting compensations; and
- (5) International partnership.**

For each of the sub-areas, the Strategy establishes goals (one per sub-area) and expected outcomes (one or more per goal).

The overall **expected impact** (referred to as “socio-economic impact”) of the Strategy was described as follows:

- 1) Developing viable mechanisms for quality assistance and protection of victims and presumed victims for their socio-economic rehabilitation and (re)integration and especially the establishment of favorable conditions for the harmonious growth and development of victims of child trafficking.

²¹ National Strategy for Preventing and Combating Trafficking in Human Beings 2018-2023 approved by the Government Decision No.461 of 22 May 2018, pp.3-4. Access: http://www.antitrafic.gov.md/public/files/Strategy_and_Plan_antitrafic_ENG_publicat.pdf

- 2) Preventing the phenomenon of THB by strengthening the efforts of specialists of competent institutions, development partners, and civil society will help mitigate the consequences of this phenomenon on human beings, especially women and children.
- 3) The investigation, criminal prosecution, and punishment of persons who have committed THB will help restore the rights of THB victims and compensate for moral and material damages by ensuring social equity.

In addition to these overall impact statements, the Strategy describes expected impacts for each of the sub-area goals (one statement per goal).

To operationalize the Strategy by detailing relevant tasks, stakeholders responsible for their implementation, and budget allocations, two NAPs, for 2018-2020 and 2021-2022, were adopted²² and implemented. The NAPs establish specific objectives under each of the sub-area goals (one or more per goal), defines activities contributing to these objectives (one or more per specific objectives), as well as the relevant indicators (one or more per activity).

The Strategy/NAPs were drafted through an extensive consultative process involving state and non-state as well as international actors. A series of multilateral consultative meetings were held throughout 2017-18 for that purpose, and the input and suggestions were collected from the key stakeholders. Decisions on what was to be included into the Strategy document were made by consensus.

The implementation of the Strategy and NAPs took place in line with the provisions of the Law 241/2005. The general oversight was done by the NCCTHB, while the direct functions of monitoring the implementation, as well as analyzing the relevant information and submitting to the GoRM annual national reports on action against THB, were directly assigned in the Strategy document to and performed by NCCTHB's Permanent Secretariat (now the Directorate for Coordination in the Field of Human Rights and Social Dialogue of the State Chancellery). At the local level, the implementation of the Strategy was expected to be operationalized through the relevant action plans developed, coordinated, and monitored by the TC THB. The main non-governmental and international partners in the Strategy/NAP implementation are International Organization for Migration (IOM); Organisation for Co-operation and Security in Europe (OSCE), International Centre "La Strada", National Centre for Prevention of Child Abuse, and other national and international organisations.

2.1.4 The context of the present evaluation

In mid-2020, Government Decision No.386/2020 introduced a new Regulation on planning, development, approval, implementation, monitoring, and evaluation of public policy documents. The decision triggered a complete revision of the system of policy documents in Moldova, which led to the pre-term expiration of the Strategy and NAP 2021-2022 in June 2022.

The new Regulation (paragraph 57) stipulates that after the expiration of the implementation period of a public policy document, a final evaluation should be carried out to assess objectively the current conditions in the target area, using the criteria of relevance, effectiveness, efficiency, sustainability, and impact. Per paragraph 58 of the Regulation, such an evaluation can be external and conducted by an independent entity sub-contracted by the central public authority responsible for the evaluation, or by development partners, in line with the procedures established by the relevant policy document and on the basis of the monitoring reports prepared during its implementation.

²² Government Decisions No.461/2018 and No.319/2021 respectively. Access: https://www.legis.md/cautare/getResults?doc_id=101736&lang=ro ; https://www.legis.md/cautare/getResults?doc_id=128842&lang=ro

The present independent final evaluation the National Strategy to Prevent and Combat Trafficking in Human Beings for 2018-2023 and its two National Action Plans was commissioned in July 2022, in accordance with these normative provisions, by the International Centre “La Strada” within the framework of its project “*Strengthening the national counter-trafficking and gender-based violence response in the Republic of Moldova in the context of armed conflict in Ukraine*”. The aim is to deliver the necessary expert support to the Directorate for Coordination in the Field of Human Rights and Social Dialogue of the State Chancellery in strengthening the national CT response by the structural adjustment of national CT policy to new challenges, particularly those presented by the armed conflict in Ukraine, and the new requirements for planning, monitoring, and evaluation of public policies established by the Government Decision No.386/2020.

Findings and recommendations of the report will be used as a reference for the elaboration of the national policy on preventing and combating THB for the next planned period.

2.2 Evaluation methodology

For the purposes of this report, an ex-post (final) evaluation is understood as

the systematic and objective assessment of a completed policy, its design, implementation, and results, aiming to determine the relevance and fulfilment of objectives, efficiency, effectiveness, impact, and sustainability, as well as coherence with the relevant international frameworks, other adjacent national policies and legislation, institutional documents, and interventions in the same context.

The goal is to provide information that is credible and useful, enabling the incorporation of lessons learned into the decision-making process, particularly on the development of follow-up strategy and action frameworks.

The evaluation criteria defined by the Organisation for Economic Co-operation and Development (OECD) and reflected in the GoRM Decision No.386/2020 will be applied, as follows:

(1) RELEVANCE – the extent to which the National Strategy to Prevent and Combat Trafficking in Human Beings for 2018-2023 (Strategy) and the National Action Plan (NAP) for 2021-2022 are suited to the country’s needs, including but not limited to:

- To what extent the objectives and outcomes are consistent with, and supportive of the identified issues?
- Did the Strategy respond to the needs of the final beneficiaries?
- Did the Strategy respond to the needs of the other target groups/stakeholders?
- What is the quality of the results matrix or similar tool? Does it clearly show how activities will achieve results and impact?
- Are the objectives/outcomes framed to be achievable in the established timeframe?
- Are there indicators Specific, Measurable, Achievable, Realistic and Time-bound (SMART)?
- Are the activities and outputs planned appropriate to achieve the outcomes and objectives?
- Are assumptions holding true? Are risk management arrangements in place?
- Have key stakeholders been actively involved in and contributed to the design process?
- Are coordination, management and financing arrangements clearly defined and do they support institutional strengthening and ownership?
- Is the timescale and/or range of activities realistic with regard to the stakeholders' capacities?
- How adaptable is the design to changes in its relevance?

- Have the relevant cross-cutting issues (gender, human rights, or others) been adequately mainstreamed in the policy design?
- (2) In connection with relevance, an additional criterium of **COHERENCE** (the extent to which other related actions support or undermine the Strategy and vice versa), recently introduced by the OECD,²³ will also be applied, discussing, *inter alia*:
- Is the Strategy harmonised with the core international frameworks on counter-trafficking?
 - Did the Strategy consider other relevant priorities of the Government and other stakeholders?
 - Is there sufficient coordination? Does the Strategy/NAP (or their parts) complement or duplicate other existing strategies/policies (e.g. on human rights, migration, combating crime, etc, as well as institutional strategies and plans)?
- (3) **EFFECTIVENESS** – the degree of achievement of the set objectives of the National Strategy and NAP, including but not limited to:
- Have the priority outputs been achieved? Have the outputs achieved contributed to the intended outcomes?
 - Have the indicators/targets been used to measure progress?
 - What is the quality of the results/ services/ products made available through the NAP implementation? Do all relevant stakeholders have access to and/or are they using results/services/products available? Are there any factors which prevent stakeholders from accessing the results/services/products?
 - To what extent have the intended outcomes been achieved? Is the outcome achievement correctly reflected by the indicators/targets?
 - To what extent has the responsible agencies adapted to changing external conditions in order to ensure the attainment of objectives/outcomes?
 - To what extent have there been any unplanned positive effects in relation to anticipated results? To what extent has this contributed to results produced/services/products provided?
- (4) **EFFICIENCY** – the method of using the allocated budget funds, including but not limited to:
- Do the inter-institutional structures e.g. committees, working groups, monitoring systems, allow efficient implementation?
 - Have all partners been able to provide their financial and/or human resources contributions?
 - Have activities been implemented and render expected results within the envisioned timeframes? If not, why not?
 - Is the communication and data exchange between responsible agency, implementing partners and final beneficiaries satisfactory?
- (5) **IMPACT** – the positive and negative changes produced by the public policy document, including but not limited to:
- What are the direct impacts at outcome level?
 - What other impacts appear likely upon expiration of the Strategy/NAP?
 - Were the targets realistic and met?
 - Were any external factors to jeopardise the Strategy’s direct impact?
 - To what extent does/will the Strategy have any indirect positive and/or negative impacts (i.e. environmental, social, cultural, gender and economic)?
 - Have there been/will there be any unplanned impacts on non-targeted communities?
 - Were timely measures taken to mitigate the unplanned negative impacts? What was the result?
- (6) **SUSTAINABILITY** – the ability to have long-term performance, including but not limited to:
- Are the results supported institutionally and funds for that made available? Are they affordable for the stakeholders?
 - Can the benefits be maintained if economic factors change?
 - To what extent have relevant stakeholders been involved in decision-making?

²³ See Applying Evaluation Criteria Thoughtfully, OECD Publishing, Paris, 2021. Access: <https://doi.org/10.1787/543e84ed-en>

- What is the likelihood that the final beneficiaries will continue to make use of relevant outputs? Are there any potential obstacles to that?
- What kind of high-level support has been provided from the relevant national, sectoral, and budgetary authorities?
- What are the potential effects of changes in the political climate and priorities?
- Is any policy support likely to continue beyond the established timeframe?

Objective is defined as a statement, which reflects the result and the positive impact expected to be achieved as a result of the effort made according to the vision and the established purpose. Objectives can be general and specific.²⁴

Impact is defined as the effect of a public policy on the well-being of society as a whole or on its part.

Outcome means the direct results of a set of activities and actions on development or targeted changes in people, economic agents, institutions, etc., reflecting changes in behavior, competences, skills, or performance.

Output is defined as an immediate result (product) of an activity or a group of inter-related activities.

Indicator is defined as a quantitative or qualitative factor or variable that provides a simple and reliable means to measure achievement, to reflect changes connected to an intervention, or to help assess the performance of a development actor.²⁵ Indicators should ideally correspond to the so-called SMART criteria (an abbreviation that stands for Specific, Measurable, Attainable, Realistic and Time-bound).

Quantitative indicators capture measurable changes in absolute numbers, frequency, ratio, degree, variance, etc. (e.g. number of persons covered by a campaign; percentage of trained staff who report using new skills in their work; ratio of female to male victims accessing assistance, etc.).

Qualitative indicators are a narrative assessment that captures change over time against certain predetermined criteria (e.g. draft law developed through an inclusive, transparent process; extent to which feedback from target groups and final beneficiaries was incorporated; quality of the draft as assessed by the legislation control authorities, etc.)

Factual (also known as binary) indicators are yes/no indicators used to define whether something has happened (e.g. analysis performed; report published; law adopted, etc.)

Hybrid (or mixed) indicators quantify qualitative data (e.g. by scoring, assigning indexes, etc.)²⁶

Baseline is understood as the situation at the time of preparation of the public policy document, against which progress is measured or comparisons are made as part of the evaluation process.

Target is a set level of performance, expressed by the change in behavior, quality of final services, and/or availability of products, goods, or services that the public administration seeks to achieve in a certain period of time by implementing public policy in order to achieve its objectives.

²⁴ Unless specified otherwise, definitions established for the purposes of this evaluation are based on the *Methodological guide for the intermediate and ex-post evaluation of public policies* (provided by the State Chancellery of the Republic of Moldova in Romanian).

²⁵ Glossary of Key Terms in Evaluation and Results Based Management. Sida 2007 in cooperation with OECD/DAC. Access: <https://www.oecd.org/dac/evaluation/dcdndep/39249691.pdf>

²⁶ Handbook on Qualitative Indicators. Office for Democracy and Governance, United States Agency for International Development, Washington, D.C., 2005. Access: https://pdf.usaid.gov/pdf_docs/PNAEB361.pdf

Results-based approach is a project/policy management framework that uses logical chains that link inputs, activities, outputs, outcomes, and impact, using results information at each level to demonstrate achievement (or not) of the desired change.²⁷

The *Methodological guide for the intermediate and ex-post evaluation of public policies* provided by the State Chancellery of the Republic of Moldova was consulted extensively throughout the evaluation process.

The evaluation encompassed the following steps:

- desk review and analysis of the available documents (see Annexes 1 and 3)
- analysis of the current trafficking in persons situation in Moldova (based on available secondary sources);
- analysis of the political context framing the Strategy/NAP design and implementation (based on available secondary sources);
- semi-structured interviews and focus groups with the relevant stakeholders (see Annex 2);
- consultations with La Strada Moldova;
- validation of the preliminary report containing relevant findings and recommendations with the key stakeholders prior to its finalization, through its circulation for review and comments, as well as a validation roundtable with the stakeholders (held on 23 November 2022, see Annex 4).

The evaluation is based on qualitative and quantitative research methods, including:

- document/ research analysis;
- key informant interviews with experts from different state and non-state structures with responsibilities in the CT field;
- focus groups with the relevant local stakeholders;
- case studies.

The Republic of Moldova is under constant scrutiny of international monitoring in the area of preventing and combating THB, including through such instruments as the Universal Periodic Review, regular assessments of the Group of Experts on Action against THB (GRETA), monitoring by the OSCE, annual review and rating²⁸ by the United States Department of State in its Trafficking in Persons Report, and others. Relevant past and current findings and recommendations of these monitoring instruments are used in this evaluation as a reference for analysis and a resource for formulating the recommendations.

²⁷ Strengthening the Results Chain: Synthesis of Case Studies of Results-Based Management by Providers. OECD Policy Papers. No.7, August 2017, p.7. Access: https://read.oecd-ilibrary.org/development/strengthening-the-results-chain_544032a1-en#page1

²⁸ Governments are placed in three tiers according to their level of effort to combat THB. Tier 1 governments fully meet the minimum standards for the elimination of trafficking as established by the US Trafficking Victim Protection Act (TVPA). Tier 2 governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards. Tier 2 Watch List governments do not fully meet the TVPA's minimum standards but are making significant efforts to do so, and for which (a) the estimated number of victims of severe forms of trafficking is very significant or is significantly increasing and the country is not taking proportional concrete actions; or (b) there is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecutions, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of trafficking by government officials. Tier 3 governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so. Tier 3 countries may be subject to certain restrictions on assistance from the US. (Ref. Trafficking in Persons Report 2022, access: https://www.state.gov/reports/2022-trafficking-in-persons-report/#report-toc_section-8)

The evaluation was conducted in close coordination with the State Chancellery of the Republic of Moldova as the acting national CT coordinator. La Strada Moldova provided financial resources for the research, available background documents and information, along with the administrative and logistical support of the required fieldwork and validation exercises.

2.3 Limitations

The following limitations should be taken into account in connection with the findings described in this report:

The collection of documents for the desk research was somewhat constrained due to language barriers. Not all documents that needed to be examined were available in English or Russian (languages of the evaluator) at the time of the evaluation. Governmental agencies' websites in Moldova do not always have up-to-date Russian or English versions, fully aligned with their Romanian versions; and English versions of documents made available for the evaluation occasionally had discrepancies with their originals in Romanian. These sources thus had to be reviewed/verified using online translation services, and electronic search for certain documents or reports was occasionally complicated.

The field work for the evaluation took place in the context of the multiple crises triggered by the COVID-19 pandemic and Russia's full-scale invasion of Ukraine, a general overhaul of policy development and planning system in Moldova, increased scrutiny of the government efforts against THB (including another GRETA evaluation round) in the context of the crisis with refugees/ third country nationals arriving/ transiting from Ukraine, and ongoing institutional reforms. These factors, *inter alia*, affected the national reporting timelines and, hence, the availability of data. At the time of the evaluation, the Directorate for Coordination in the Field of Human Rights and Social Dialogue of the State Chancellery was still in the process of collecting reports from stakeholders on the NAP implementation within the first half of 2022, so a significant part of the information on the progress made in the last six months was still missing at the time of writing. The difficult context also had an impact on the availability of frontline service providers to participate in the evaluation, and may have affected the views and outlook of the Strategy/NAP stakeholders as captured during interviews.

Most of the interventions planned as part of the Strategy and NAPs had no established baselines or targets. Likewise, no indicators, baselines, and targets were established to measure the outcomes and impact of the Strategy. This results in limited applicability of self-assessments regarding the extent of activity completion included in the National Reports, as well as in a general scarcity of data to measure the outcomes and impact. The regularly collected statistical data on the numbers of victims identified and assisted, number of cases prosecuted, verdicts issued, etc. reflect the trends and progress only to a certain degree, as these numbers are influenced by a large variety of external factors outside of Strategy/NAP stakeholders' control. Some of the information could be collected through the examination of secondary sources for proxy measurements and soliciting expert/practitioner opinions during interviews.

The evaluation of efficiency was also limited due to a variety of factors, particularly the lack of information on financial allocations for CT efforts, aside from that provided in the National Reports on preventing and combating THB, the differences in inputs made available for the Strategy/NAP implementation (national stakeholders vs. development partners), and high staff turnover in some of the responsible institutions.

Although most of the interviewed experts were highly-experienced practitioners in the CT sphere, in a small number of cases representatives of governmental and non-governmental stakeholders who were

available for interviews did not possess the necessary knowledge or data to provide qualified responses to the evaluation questions. Information and views of all interviewees are influenced by bias associated with their institutional affiliation or position within their respective agencies. The involvement of victims of trafficking and persons at-risk in the evaluation was extremely limited for logistical reasons and time limitations.

3. Evaluation results

3.1 Relevance

The necessity of a comprehensive strategy in the CT sphere was justified by the gaps identified in the previously existing policy documents (overlapping efforts and resources, different reporting periods and indicators, different statistical data collection systems, etc.) and the need to incorporate all strategic objectives in this sphere in one document, as well as to harmonise and strengthen the efforts of the competent authorities and organisations.

“The Strategy was needed for our own planning, seeing the work of other agencies where we can be partners, budgeting.”

“The Strategy is important, and its content is very well developed. We discuss problems, what needs to be done, and what we expect as an outcome.”

“The Strategy stated the achievements, identified gaps and focus. It was good to have that document that provides a summary of where we are now and where we need to go.”

(From interviews with the Strategy/NAP stakeholders)

Analysis of the document and stakeholder interviews²⁹ suggest that the general approach of the Strategy was **to create adequate conditions/frameworks to respond to THB as a problem regardless of its constantly changing status and trends**, using the standards for a comprehensive CT system established by the CoE Convention on Action against THB as a basis for the development of an initial logical framework. Guidelines for the Development and Implementation of a Comprehensive National Anti-Trafficking Response issued by the International Centre for Migration Policy Development³⁰ were also used as a resource.

The overall aim of the Strategy was broadly stated as *“sustainable development of the national system for preventing and combating THB through the 4P paradigm.”* To that end, the Strategy identified a vast variety of issues across five areas and 15 sub-areas, based on the framework provided by the CoE

“The exercise of comparing the situation with the standards let us understand where we were. We saw that we had already met many of the standards.”

(From interviews with the Strategy/NAP stakeholders)

Convention on Action against THB. The **advantage** of this approach was that it allowed the stakeholders to comprehensively assess at the Strategy development stage the entire CT system in the country against the international standards and build their interventions on the **demonstrated impressive progress** that had been achieved by the Republic of Moldova. Additionally, such an extensive scope of the Strategy provided a basis for its **long-term relevance**. Its most significant **disadvantage** was the scope of issues that the Strategy document ended up covering and, as a result, difficulty to clearly identify which *priority* issues the Strategy aimed to address when

attempting to ensure sustainable development of the national CT response.

Objectives and outcomes are also established by sub-area rather than by area, which makes for a total of **15 goals, 58 expected outcomes, and 42 specific objectives** in the NAP 2018-2020. Such a high number of strategic goals and outcomes makes it hard to grasp the strategic direction and priorities of

²⁹ Interview with the International Centre “La Strada”

³⁰ See International Centre for Migration Policy Development (2006). Guidelines for the Development and Implementation of a Comprehensive National Anti-Trafficking Response, ICMPD, Vienna
https://www.icmpd.org/file/download/52502/file/Guidelines%2520for%2520the%2520Development%2520and%2520Implementation%2520of%2520a%2520Comprehensive%2520National%2520Anti-Trafficking%2520Response_500%2520kb.pdf

the policy. Furthermore, there are numerous overlaps across the five areas and their sub-areas, which affects the overall intervention logic. For example, the objective for sub-area “Repatriation” is formulated as: *“Strengthen the institutional capacities of the competent authorities in the field in order to make the repatriation procedure more efficient”*. Interventions in this sub-area seek to produce two main outcomes: *“Mechanisms for the use of financial resources adapted to the nature and context of organising the repatriation missions”* and *“Specialists from central and local public administration trained how to apply repatriation procedures”*. The sole specific objective to achieve these two outcomes included in the NAPs is Specific Objective 10.1. *“Build capacity of specialists in applying repatriation procedures”*, which is expected to be achieved, for instance, in 2018-2020 NAP, solely by implementing Activity 3.2.1. *“Train specialists from central and local public administration on how to apply repatriation procedures”*. Evidently, only one of the outcomes foreseen for this sub-area is covered by the planned activities. The activity, in turn, is also relevant for the sub-area “Capacity building” objective (*“Develop the professional capacities in the field of preventing and combating THB in order to promote effectively the policy on preventing and combating THB”*). At the same time, Activity 1.5.2 (*“Improve the repatriation procedures by amending and supplementing the Government Decision No 948/2008 approving the Regulation on Procedure for Repatriation of Child and Adult VoTs, People in Difficulty and Unaccompanied Children”*) included under sub-area “Financial management”, Specific Objective 5.1 (*“Increase gradually the financing of anti-trafficking actions from the state and local budgets”*), in fact, contributes to the other outcome under sub-area “Repatriation”. This Activity is also relevant for the achievement of Specific Objective 2.1 (*“Improve the regulatory framework to provide assistance and protection to victims and presumed victims of THB”*) under sub-area “Legislation”. At the same time, issues identified under sub-area “Repatriation” such as *“impediments to the implementation of the repatriation procedure resulting from the difficulty of documenting adult beneficiaries”* and *“signing of the relevant Agreements with RF and Ukraine remains challenging”*, are not further addressed in the Strategy and by NAP interventions under this sub-area. Yet, some of the progress with the improvement of procedures for the issuance of identity document included in the national reports under sub-area “Legislation” and “Identification” is relevant to the former of the two issues, while the latter is addressed through the attainment of Specific Objective 15.1 (*“Develop international collaboration with the main countries of destination and transit”*), Activity 5.1.1 (*“Conclude bilateral agreements on repatriation, assistance, protection and prosecution with the countries of destination and transit”*) under sub-area “International cooperation”.

A slight tendency is observed in the NAP 2021-22 towards the amalgamation of areas of intervention (the NAP establishes **30 specific objectives**), which helped eliminate some of the overlaps.

The main focus of the Strategy is on the **institutional aspects** of the CT response and thus on strengthening the *means* of preventing and combating THB. As indicated above, the Strategy does not focus on achieving a particular *change* in the current THB situation in Moldova through these means. At the same time, the Strategy specifically identifies several relevant problems that need to be addressed in the section discussing anticipated impact, including:

- the feminisation of poverty that keeps the number of victims and presumed victims of THB, sexual exploitation, and forced prostitution high and forces women into even greater financial dependence;
- the increase in the number of victims exploited through work and inside the country;
- victims' age getting younger; and
- emergence of new forms of exploitation that have not yet been criminalized in the national legislation.

These could be used to guide the Strategy developers in setting up priorities under each of the areas and sub-areas. Yet, even though the Strategy does establish goals and outcomes, and the NAPs include activities, that contribute to addressing these issues, these interventions are not necessarily presented as

priority,³¹ and *all* of the activities and outputs seem of equal importance from the way the document is drawn up.

The **analysis of issues** has some additional shortcomings. Firstly, it does not appear to be substantiated by any research or data.³² Secondly, general challenges and emerging THP risks are occasionally discussed together with institutional challenges but there is no section systematically analysing the current state, trends, and challenges of THB in Moldova. For instance, references are made to “new trends and developments” or “new forms of THB” throughout the Strategy, but they are specified only sporadically across various sections of the Strategy. This, *inter alia*, makes it difficult to assess the extent of achievement of the desired change by interventions seeking to address these “new trends/developments/ forms of THB” such as legislative amendments or prevention efforts. Furthermore, identified issues (needs/gaps) oscillate between more general and very specific (e.g. lack of systematic training vs. removal of one staff unit and need to update data collection forms). This makes it difficult in some cases to establish the cause-effect connections between identified issues and likely made it harder for the Strategy developers to formulate the intervention logic. The discussion of issues in the area of international cooperation is particularly weak.

Finally, the Strategy does not include an analysis of **cross-cutting issues**, and their integration is not systematic. Human rights and gender are mentioned in general terms at the level of goals/objectives and outcomes, and the Strategy commits, through its Action Plans, “*to discourage the demand for these phenomena [i.e. THB, sexual exploitation, forced prostitution, forced labour, younger victims, emerging forms of exploitation] and provide a new impetus for strengthening human rights, especially of women, and promoting gender equality.*” Some of the planned interventions (particularly in the sub-areas of reducing vulnerability, rehabilitation & reintegration, victims’ rights within the criminal justice system, and compensation) do contribute to the strengthening of the protection of human rights and to greater gender equality; however, these issues are not mainstreamed in the Strategy/NAP. Disability and minority inclusion is sporadic and generally weak. Environmental considerations are not integrated in the Strategy/NAP design.

While the Strategy, despite its broad scope, has a relatively strong **internal coherence**, it is in some cases difficult to establish the logical link between the identified issues (gaps/needs), stated strategic goals and expected impact, and key outcomes. While the goals and expected impact are formulated in a fairly general manner, most of the issues described in the Strategy are quite specific and detailed, and a significant number of expected outcomes respond directly to these pinpoint issues. Furthermore, most outcomes are formulated as outputs or even activities and do not describe the desired institutional or behavioral change. This makes it unclear in some cases how the achievement of expected outcomes contributes to the attainment of strategic goals and anticipated impacts.

³¹ Interestingly, the 2018 national report states that the intended impact of the Strategy is “to reduce the number of victims and presumed victims of THB, to deter the increase in the number of victims of labor exploitation and of victims exploited inside the country, to strengthen human rights, as well as to promote gender equality.” This statement of intended impact is more reflective of the issues concerning the THB situation identified in the “impact” section of the Strategy; however, it does not correspond to how expected impacts are described in the Strategy.

³² For instance, the Strategy could consider the findings of the Human Trafficking Survey: Belarus, Moldova, Ukraine prepared by the International Organization for Migration (IOM) in 2017, which suggested that the general awareness of THB in Moldova was relatively high (81%) but decreased since the previous similar survey conducted in 2015. At the same time, the survey found that the predominant public understanding of THB was associated with sexual exploitation of young women and girls, and the knowledge of other forms of THB was low. This demonstrates that the Strategy developers correctly identified the issue of Moldovan population not being sufficiently informed about the evolution of the phenomenon of THB and the existing risks, and the greater relevance of the proposed interventions specifically aimed to raise awareness on the new trends and risks of THB. Another survey based on the same methodology was commissioned by IOM in 2019 and could offer stakeholders insight into the effects of their awareness raising efforts implemented in 2018.

Table 1. Example of logical gaps between expected outcomes, strategic goals, and expected impact

Sub-area: “Legislative and normative framework”			
Identified issues	Expected outcomes	Goal	Expected impact
Law No 241 does not define "presumed victim", does not stipulate the NRS elements, manner of identifying victims and presumed victims, duties of institutions in charge of NRS implementation	Enhanced national legal framework to provide assistance and protection to victims and presumed victims of THB and child trafficking.	Regulate the relationships related to preventing and combating THB, in accordance with the principles of human rights and gender equality	National legal framework harmonised with principles of human rights and gender equality
The system of rehabilitation of victims of crime, including victims of THB, is not regulated by the legal framework on social assistance			
Guidelines on Identification of Victims and Potential Victims of THB does not provide the profile of presumed victims of THB and is not updated in line with the new legal changes			
Need to amend and complement the legal framework in line with developments	Definitions, notions, regulations adopted on new forms of exploitation, criminalisation of begging by adults.		

In addition to the goals and outcomes stated in the Strategy, the NAPs establish their own specific objectives for each of the sub-areas of interventions. These **specific objectives** are not always directly connected to the expected outcomes for each sub-area, in which cases it is not clear how they will contribute or are connected to the achievement of the stated goals/ expected impact or address the identified problems. There is sometimes no continuity between specific objectives that the NAP for 2018-2020 and for 2021-2022 seek to attain. It is not always clear in such instances from the available documents why some of the unachieved specific objectives were dropped, albeit part of this can be explained by an attempt to amalgamate the relevant interventions and streamline the plan.

Table 2: Example of logical gaps between specific objectives, expected outcomes, goals, expected impact, and identified issues

Sub-area: “Reducing vulnerability”				
Identified issues	Goal	Expected impact	Expected outcomes	Specific objectives
1) Lack of concept regarding the social reintegration programs, insufficient skills and resources of local public administrations to reduce the vulnerability of the population.	Reducing people’s vulnerability to THB	The population informed about the danger of THB, provided with reference information materials on the protection available, and has access to assistance and protection programs	Vulnerability reduction programs developed and accessible to vulnerable people, including job-seekers	<i>NAP 2018-20:</i> Specific Objective 7.1.: Ensure that groups at risk are informed about the new trends in THB and related crimes
2) Insufficient interaction between the NRS mechanism and the intersectoral cooperation mechanism for the identification, assessment, referral, assistance and			Access of vulnerable people to the necessary services ensured	Specific Objective 7.2.: Develop mechanisms for safe employment of Moldovan citizens both in the country and abroad
			Access of potential emigrants to the national and foreign	Specific Objective 7.3.: Ensure that children

<p>monitoring of child victims and potential victims of violence, neglect, exploitation and trafficking.</p> <p>3) Lack of a training program for specialists of the territorial employment agencies to inform job seekers about the risks of THB.</p>			<p>labour market facilitated under fair and protected conditions</p> <p>Professional and entrepreneurial competences of vulnerable people, including job-seekers, developed and strengthened</p>	<p>and adolescents have access to information on possible dangers of THB, gender equality, children's rights</p> <p>NAP 2021-22: Specific Objective 7.1: Development of information and vulnerability reduction services for integration into the labour market</p> <p>Specific Objective 7.2: Ensuring children's and adolescents' access to information about the possible dangers of THB, gender equality, children's rights</p>
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Finally, a small number of important issues, expected outcomes, and impacts described in the Strategy are not reflected in the NAPs at all (examples: professional enhancement of the NRS National Coordination Unit; methodologies developed and expenditure rules approved for specialised social services for victims and presumed victims of THB; specialists trained in planning the mid-term budgetary framework and next year's budget, and in attracting external sources, etc.)

The NAPs contain a large number of **activities** contributing to the attainment of specific objectives, with an uneven distribution of effort between goals. In some cases, the scope of planned activities is insufficient for the achievement of these objectives/ goals or the expected impact. For example, the sole activity of monitoring of court cases planned in the 2018-20 NAP to achieve Specific Objective 12.2 “*Ensure a fair trial and comply with international standards in the area*” is not sufficient to attain this objective, or its respective outcome of “*Fair penalties for committed crimes*”.

Continuity of activities between the two NAPs is generally maintained, although not always consistent. A number of important activities planned in the 2018-20 NAP that remained unimplemented were not extended into the 2021-22 NAP, especially those seeking to improve THB data collection and analysis:

- Activity 1.2.2. Adjust the Methodology for planning and monitoring of the national anti-trafficking policy in accordance with the policy document;
- Activity 1.4.1. Organise training courses on the implementation of the Electronic Program of the Permanent Secretariat of the NCCTHB for the relevant specialists;
- Activity 1.4.2. Adjust and update the Electronic Program of the Permanent Secretariat of the NCCTHB to the new THB trends;
- Activity 1.4.4. Develop specific guidelines on the procedure of analysis/monitoring of the situation of THB;
- Activity 1.4.7. Train specialists on how to use the Central Data Bank [of the Ministry of Interior];
- Activity 2.3.4. Develop instructions for employment and observance of social rights and working conditions of employees (agriculture, livestock, and construction);
- Activity 4.1.1. Increase the number of specialists with analytical duties in the CCTiP;
- Activity 4.1.2. Develop a database (based on I2base) [for the CCTiP];

- Activity 4.1.3. Train police officers and prosecutors how to manage and use the database (I2base);
- Activity 4.1.8. Revise the competencies of the CCTiP and transfer it into direct subordination of the General Police Inspectorate;
- Activity 4.1.9. Draw up the Institutional Development Strategy of the CCTiP;
- Activity 4.1.12. Provide modern equipment to investigate cases where information technology was used to commit human trafficking and related crimes;
- Activity 4.3.2. Implement the Regulation on the activity of the Interdepartmental Commission for financial compensate by the State of the damage caused by crime and monitor the financial compensation of victims of human trafficking.

Many of these activities have continued to be relevant, as the issues they were designed to address remained unresolved.

At the same time, the 2021-22 NAP introduced a number of **new activities**, some of which required significantly longer timelines than the seven months essentially available for their implementation³³ (for example, Activity 1.1.2 “Assigning the role of reporting on CT activities (to a national rapporteur)”); Activity 5.1.1. “Amendment of Law no. 137/2016 [...] in the part related to the procedure and institution responsible for the transfer of financial compensation to the victim [...]”; Activity 11.3.1 “Monitoring the implementation of the mechanism to assist and protect victims of crime and assessing efficiency, with a focus on victims of THB” etc.). These activities will need to be extended into the next policy document on CT, if it is developed, or implemented as part of other concurrent policies, where relevant.

In a small number of cases, the relevance of planned activities to their specific objectives and expected outcomes was not clear.

Table 3. Example of logical gaps between planned activities, specific objectives, and expected outcomes

Sub-area: “Reducing vulnerability”		
Expected outcome	Specific objective	Activities
Outcome 2.1. e) Diaspora informed about the THB, its consequences and the institutions that may be contacted, if needed	Specific Objective 6.4.: Inform the diaspora about the phenomenon of THB and its consequences	<p>2018-20 NAP:</p> <p>2.1.8. Organise information, education and communication activities, especially for young people, on THB and the social danger of this phenomenon, as well as of the related issues</p> <p>2.1.9. Inform the diaspora about the phenomenon of THB, its consequences and the institutions where they can seek help, if needed</p> <p>2.1.10. Organise a (photography/drawing) art contest aimed at raising awareness of THB and related crimes among young people</p> <p>2021-22 NAP:</p> <p>6.4.1. Informing the diaspora about the phenomenon of trafficking in human beings, its consequences and the institutions to which it could address if necessary</p> <p>6.4.2. Organizing within the Program "The Government Closer to You" of an information campaign in the diaspora on preventing illegal employment and reducing exploitation risks</p> <p>6.4.3. Addressing the topics of preventing and combating THB in TV/radio shows</p>

Some of the planned activities (often formulated like outcomes or even objectives), while important to the realization of the Strategy’s expected outcomes and objectives, **go beyond the scope of the Strategy** and its respective NAPs. These activities tend to remain unimplemented upon the expiration of the relevant NAPs, based on the information available from the National Reports.

³³ Note that the 2021-22 NAP was adopted in November 2021 and expired in June 2022 together with the Strategy.

Table 4. Examples of activities that go beyond the scope of the CT Strategy

Activity	Comment
Activity 4.3.2 (2018-2020 NAP) <i>“Implement the Regulation on the activity of the Interdepartmental Commission for financial compensation [...]”</i>	The Regulation covers victims of all crime, not just victims of trafficking, and hence should be addressed as part of a wider policy document on justice reform. The implementation of the Regulation is constrained by multiple factors, which would need to be addressed through a set of actions (e.g. analysis and removal of gaps in the normative framework, training authorities responsible for the Regulation’s implementation, informing potential beneficiaries and assisting them in filing their claims etc.), which means that “Implement the Regulation...” cannot be a single activity.
Activity 2.2.4 <i>“Ensure the access of potential emigrants to the national and foreign labour market under fair and protected conditions”</i>	This is, in fact, an objective, as ensuring that emigrants have access to labour markets under fair and protected conditions would require achieving a wide range of results in multiple areas (legislation, capacities, awareness, oversight, etc.). As an objective, it goes beyond the scope of a specialised policy on THB and is a subject matter of broader policy documents (e.g. National Employment Strategy).
Activity 1.4.5 <i>“Implementation by the territorial social assistance bodies of the “Social Services” module within the “Social Assistance” automated information system”</i>	Social assistance is provided to a significantly wider scope of beneficiaries than victims and potential victims of THB. Similarly to the Regulation on the activity of the Interdepartmental Commission for financial compensation, implementation of the “Social Service” module may depend on a range of factors, which are beyond the focus of the CT Strategy/NAPs. For instance, if the module has serious deficiencies in its design or usability or end-users need training – the CT Strategy/NAP would not be the policy to allocate the necessary resources to address these issues.

The Strategy does not define who its final beneficiaries are, but it can be presumed that they are victims of THB and persons at risk. The profile, situation, and **needs of the final beneficiaries** are not systematically analysed in the Strategy. The unstated assumption is that the final beneficiaries are in need of certain types of interventions/ services, which the Strategy aims to establish, maintain, and/or improve.

Examples (sporadically included in the Strategy):

- A mechanism needs to be set up to refer disadvantaged persons to the social assistance system.
- It is necessary to include a distinct module on THB prevention in the process of informing and training job seekers.
- Need to ensure active measures on the labour market, focused on the individual needs of the unemployed, as well as on the employers' needs, such as: vocational training, subsidised employment of vulnerable categories of people on the labour market; supporting the creation and adaptation of jobs for people with disabilities; internship, on-the-job training; supporting self-employment.

Some of these identified needs are addressed by activities planned in the NAPs.

The expected outcomes for the final beneficiaries are likewise not systematically discussed in the Strategy, although some can be inferred from the sub-area outcome statements (example: functional mechanism of compensation and reparations for victims of THB). Overall, **the final beneficiaries are apparently not explicitly placed at the centre of the efforts** foreseen by the Strategy and NAPs or involved in the design, implementation, and monitoring of these policy documents.

The Strategy likewise does not systematically define its **target groups or stakeholders**. It can be presumed that the stakeholders and target groups are the state agencies that contributed to the development of the Strategy, participated in its implementation, or were targeted by corresponding activities; non-governmental entities such as business, diaspora, the media, civil society organizations; development partners; international observers monitoring Moldova’s fulfillment of its international

obligations; and donors. The needs of many of these stakeholders/target groups are discussed and addressed in the Strategy as identified issues. State agencies are the central focus of most of the Strategy's expected outcomes.

The key stakeholders at the national level were actively involved in the design process, which included a series of workshops and bi- and multilateral meetings to develop the Strategy/NAPs. All inputs were duly considered, and decisions on what to include in the documents were made by consensus, which ensured ownership of the document. The **process was positively reflected upon by the stakeholders** interviewed for this evaluation.

“The quality of the Strategy and plan is good, everything that needed to be included was included, and ideas submitted by stakeholders were taken into account.”

“It was good that governmental agencies participated in the development [of the Strategy], it was not just imposed on them. The methodology was well elaborated. Everyone could contribute, provided their vision and plans, considered recommendations of international missions, national needs, and donors’ interest.”

The need to elaborate the Strategy gathered together a good team of experts, people who have strong institutional memories, who created the [counter-trafficking] system.”

(From interviews with the Strategy/NAP stakeholders)

At the same time, the process had a number of apparent shortcomings. Firstly, it appears that only one type of organization of people with disabilities (persons with hearing disabilities) was specifically involved and contributed to the Strategy/NAP development.³⁴ Similarly, the involvement of the Roma rights organizations appears to be fairly limited. Both of these groups, however, are significantly affected by THB in Moldova.³⁵ Finally, the perspective and actual needs of core local level structures and organisations (TC THB, MDTs, local NGOs) is not sufficiently reflected in the Strategy/NAP design, which suggests that they were not closely involved in the process, despite being among the CT actors closest to the final beneficiaries.

“A good practice is to have a working group with them [local actors] twice a year, have them work together and develop what they need for their territory, not just [follow what was decided] at the central level. They need to be integrated into the document development, because they see things differently.

They always say they have no money, and that is because they don’t know how to plan and how to formulate the request to the Ministry of Finance. Small NGOs that work at the local level also need to be involved. It will be easier for them later to fundraise.”

(From interviews with CT stakeholders)

“Views of the local level are not taken into account.”

(From the focus group with TC THB)

³⁴ This is inferred from the fact that only one activity specifically addressing the needs of persons with disabilities who may be at risk of THB is included in the 2018-20 NAP (Activity 3.3.1. “Ensure that, with the support of sign language interpreters, the specialists who provide assistance to the hearing-impaired are informed about THB, its consequences and the rights to assistance and protection”) linking to the sole outcome referring to persons with disabilities (“People with hearing disabilities informed about THB, its consequences and their rights to assistance and protection in this context”). Incidentally, this activity is not extended into 2021-22 NAP. Only one other activity refers to persons with disabilities (Activity 3.3.3. “Implement programs for the development of entrepreneurial, professional skills and re/integration of victims, presumed victims with disabilities on the labour market”) and does so only in general terms.

³⁵ See, for instance, GRETA(2020)11; information of the IOM Mission in Moldova (access: <https://www.iom.int/preventing-trafficking-and-protecting-victims-moldova>)

The Strategy does not contain a result matrix; however, the structure of the NAPs includes some elements of a result matrix connecting activities to specific objectives and strategic goals under each sub-area and establishing output indicators for each of the activities.

As already mentioned above, most of the Strategy’s outcomes are formulated like outputs or even activities, and some of the NAPs’ specific objectives are likewise formulated like activities. Similarly, most of the impact statements attached to each of the 15 goals are formulated as outcomes or even outputs.

Table 5. Examples of outcomes, objectives, and impact statements formulated as results of a different level

Result statement	Comment
Outcome 2.3. d): Instructions for employment and observance of social rights and working conditions of employees (agriculture, livestock and construction) developed	This statement essentially describes an output of activity “ <i>Develop instructions for employment and observance of social rights and working conditions of employees (agriculture, livestock and construction)</i> ”. An outcome of having these instructions in place would be, for instance, a decreased number of violations of labour code by employers or improved conditions reported by employees in the relevant sectors of the economy
Specific Objective 8.3: Inform economic operators about the need to respect the social rights and working conditions of employees	This statement describes an activity rather than intended change. A better objective statement could be, for instance, “ <i>Ensure that economic operators implement practical measures to improve the protection of social rights and working conditions of employees.</i> ”
Impact statement: All identified victims and presumed victims of THB provided with access to quality services	The availability of services is rather an outcome of the relevant normative framework, institutional capacities, and resources having been put in place, information on the services having been made accessible to all concerned individuals, etc., which are all outputs. The impact of quality services being available would be, for instance, successful (re)integration of the victims/presumed victims into society, or improved physical, psychosocial state, socioeconomic situation, and/or living conditions of victims/presumed victims.

At the same time, some of the activities are formulated like objectives (examples: “*Ensure that territorial social assistance bodies implement the Social Services Module in the ‘Social Assistance’ Automated Information System*”; “*Ensure the access of potential emigrants to the national and international labour market under fair and protected conditions*”) or even use the same wording as the relevant specific objective (example: Specific Objective 13,1 and Activity 4.2.1 in the 2018-2020 NAP: “*Inform victims of their rights in criminal proceedings*”).

This makes for a **weak or sometimes no connection between intervention logic levels** (e.g. it is not clear how the proposed activities/outputs will lead to the intended outcomes and what change stakeholders aim to produce).

There are **no outcome- or objective- level indicators**. However, a significant percentage of the output indicators are actually outcome- or higher-level indicators (i.e. they do not measure the immediate product of the activity), which is particularly the case in the 2021-22 NAP.

Table 6. Examples of misplaced indicators

Activity (2021-22 NAP)	Indicators	Comment
3.1.3. Organization of workshops on the subject of the activity of joint investigation teams in aspects related to THB	Number of workshops organized Number of joint	A better output indicator describing the immediate product of the trainings would be number and profile of the practitioners trained. This is not an output indicator, as joint investigation

	investigation teams set up and operations carried out	teams and operations are not an immediate product of the workshops, and would be more appropriate to measure the progress at the outcome level
8.1.3. Control and monitoring of the work of private agencies and unlicensed intermediaries, including in terms of collection of recruitment fees from applicants	Number of private agencies and intermediaries subject to controls Number of presumed victims identified	A better output indicator would be percentage rather than number of private agencies/intermediaries, as it would better demonstrate the scope of the intervention Identification of presumed victims is not an immediate, guaranteed product of the control and monitoring activity, as it involves many other actions and factors. This indicator would be more appropriate at the objective/impact level

At least one or more output indicators are established for outputs of all activities. In some cases, the stated indicators do not directly correspond to the essence/scope of the activity, or, as discussed above, measure not just the immediate product of the intervention, but also its expected results at the outcome or even goal level.

Table 7. Examples of indicators that do not measure the outputs of corresponding activities

Activity (2021-22 NAP)	Indicators	Comment
4.1.4 Collection and analysis of qualitative data on the impact of THB on minorities	Number of cases detected Analysis conducted Policy proposals/ actions formulated	The relevant and useful output indicators in this case are “Analysis conducted” ³⁶ and “Policy proposals/ actions formulated”, although both need to be clarified as factual (Yes/No) or numerical indicators (Number of analyses conducted; Number of policy proposals formulated). The number of detected cases is not an indicator that qualitative data on the impact of THB on minorities has been collected and analysed. Furthermore, detection of cases is not a product of activity “Collection and analysis of qualitative data [...]”
5.1.2. Plan financial resources in the state and local budgets in order to implement actions to prevent and combat THB	Funds planned	This indicator is not particularly useful for measuring the output of this activity, as firstly, it is not clear whether it is factual (Yes/No) or quantitative (Amount of funding planned), what kind of funding allocations need to be reported on (state budget, local budgets), and what scope of activities should these funds cover (prevention, protection, etc.)

Most of the indicators are numerical or factual (Yes/No indicators) and are tied to time-bound activities. There is, however, **a general lack of qualitative indicators**, which would give depth and meaning to the facts and quantities that are being reported on. For example, the output of Activity 1.1.2. “*Conclude memoranda between different national stakeholders in the anti-trafficking field*” (2018-2020 NAP) is measured through only a quantitative indicator of “*Number of concluded memoranda*”. This measurement could be enhanced by also looking at the types of entities signing these memoranda (e.g. law enforcement authorities and social assistance services; state and non-state entities) and scope of cooperation. In another example, the output of Activity 2.1.1 “*Coordinate the conduct of the National Information and Awareness Raising Campaign*” is measured through a single factual indicator

³⁶ Albeit, in the National Reports, the only information provided on the implementation of this activity is “*CCTiP carries out the monthly collection and quarterly analysis of data on the impact of THB on minorities (art. 165; art. 206 Criminal Code)*”, and it is not clear if this analysis is then published, disseminated, or used to produce any policy recommendations, so additional indicators would be helpful (e.g. “Report published and disseminated to key stakeholders (list)”, “Minority rights groups consulted for the analysis”, etc.)

“*Campaigns conducted*”. At the same time, it could be useful to look at the focus of the campaigns and compare them to the identified information needs of the public, or the main target audiences vis-à-vis main established risk groups, and capture feedback received from implementers and covered populations.

A few of the indicators are not clear/SMART (examples: “*Referral mechanism strengthened*”, “*New forms of THB criminalized*” (without specification), “*Internal mechanisms/procedures reinforced*”, etc.), and some are, in fact, not measurements but means of verification (e.g. completed survey forms, monitoring reports).

No **baselines and targets** are established for many of the outputs, and none for the outcomes and objectives. It is not clear, therefore, how progress and success are to be measured.

Table 8. Example of how baselines and targets could be formulated for NAP outputs

Activity	Output indicator	Possible baseline	Possible target
Activity 1.3.1 (2018-2020 NAP) Train border police officers, specialists from BMA, community police officers and labour inspectors on how to react effectively to cases of THB	Number of specialists trained	5% of the border police personnel, 3% of community police officers, and no labour inspectors had training on THB as of 2017	80% of all frontline border police, 50% of community police officers, and 100% of labour inspectors are trained on THB by 2022
	Number of modules developed	One (outdated) training module available for border police and one for community police as of 2017	At least three new/updated training modules are developed (one for each type of practitioners) by the end of 2018
Activity 1.1.2 (2021-22 NAP) Assigning the role of reporting the anti-trafficking activity (to the national rapporteur)	Analysis performed	Partially as of the beginning of 2021	Completed by June 2021
	Normative framework amended*	No drafts developed as of the beginning of 2021	Government decision draft ready by the end of 2021
	Role established*	No	Yes, by the end of 2022
	*indicator would require clarification		

At the same time, the Strategy discusses at length the achievements of Moldova in the CT sphere and builds extensively on those, which is a positive practice. Many of these achievements would **present a strong baseline for the Strategy**, if it contained a logical framework clearly visualizing baselines and targets.

The goals and outcomes are largely formulated as achievable within a five-six-year horizon. However, their large number and lack of clear prioritization can present a challenge to Strategy implementers, particularly in the context with many competing priorities and limited resources. Some of the goals (and expected impact) are rather general, and it would be difficult to measure their achievement in the absence of a complex system of indicators, baselines, and targets.

Outputs are not formulated for any of the activities; however, as discussed above, each activity is assigned at least one output indicator. Even though the majority of the planned/implemented activities can be connected to the achievement of the stated outcomes or goals of the Strategy, since most of the

output indicators are numerical (e.g. “*Number of persons trained*”) and contain no targets, it can be difficult to conclude based on their measurements on whether and to what extent they contribute to the achievement of the expected outcomes. There are a number of overlapping activities, as well as overlaps across sub-areas where activities implemented under certain specific objectives also contribute to other sub-areas; this, unfortunately, is not duly noted in the NAPs or the National Reports.

The Strategy does not include an **analysis of assumptions or a risk analysis** and risk management plan. Yet, achievement of results at each level is evidently based on numerous assumptions, particularly concerning local-level stakeholders and final beneficiaries, and is significantly influenced by a considerable number of factors, such as the administrative reform, change of government, changes in migration/trafficking profiles, emergence of competing priorities, etc. Some relevant risks are listed in the SWOT analysis under “Weaknesses”; however, no response measures are discussed in the document. At the same time, it should be acknowledged that most of the external risk factors that significantly affected the Strategy and NAP implementation (particularly, the COVID-19 pandemic and the full-scale Russian invasion of Ukraine) could not realistically be foreseen and planned for at the design stage.

The Strategy and its NAPs are viewed as a **key instrument for coordination and mobilization of political and financial support of CT efforts**. While the Strategy does not specifically discuss how its implementation will be coordinated and managed, it is implied that this will be done using the existing mechanisms/platforms established by current legislation. Previous research³⁷ suggests that there are issues related to CT policy coordination/management in Moldova, which have a direct effect on the areas of institutional strengthening and ownership (also see more on this below in section 3.4 Efficiency).

“We report twice a year, but we look at it often, as there are deadlines. [...] There are things you need to do consistently, those take time [...], so as an agency that implements it [the Strategy], it is not something we remember only when we have to report.”

“The Strategy and Plan have activities and deadlines, provide more discipline. It makes you work continuously. Ad hoc meetings do not ensure that.”

(From interviews with the Strategy/NAP stakeholders)

The Strategy contains no estimation of the cost of its implementation and only analyses financial impact of some of its expected outcomes. The NAPs specify responsible authorities, partners, and sources of funding for each planned activity. In most cases, activities are expected to be implemented “within approved budgets”, which indicates that the Strategy/NAPs are **allocated no distinct budget**, and financing of the implementation is presumed to be the responsibility of each of the stakeholders as part of their overall budgets. Such an approach may not be supportive of institutional strengthening and ownership in the context of extreme resource scarcity within the GoRM. The timescale of activities planned for 2018-20 appears mostly in line with stakeholders' capacities and available resources, but significantly less so for 2021-22 (see more on this below in section 3.4 Efficiency).

Framework for **monitoring and evaluation** is briefly described in the Strategy document but lacks specifics. The NAPs do not contain any action points to ensure their continuous and effective monitoring and periodic evaluation.

Mechanisms for stakeholders' accountability are not discussed. In fact, the present accountability and reporting modalities **allow the stakeholders to implement the planned activities and achieve the**

³⁷ See Antonova (2020)

intended outcomes to the extent of their choice, without any serious consequences. The level of the document's implementation is thus largely dependent on the political will of the involved authorities.

“The Strategy is based on 4Ps. We took on and implemented what we were meant to and which was within our capacities.”

“We call it [the Strategy] our ‘permanent hobby’.”

(From interviews with the Strategy/NAP stakeholders)

No **mechanism for the revision** of the Strategy (e.g. a mid-term review) is foreseen as part of its design. However, the formulation of the NAPs for shorter intervals could have offered an opportunity to ensure ongoing relevance and implementability based on a more current assessment of needs, available time, capacities, and resources. Correspondingly, an attempt was made to scale down the 2021-22 NAP compared to the 2018-20 NAP, although the exercise would have benefitted from a mid-term evaluation of the Strategy that would point to priority areas to concentrate on in the remaining time.

“There are things you cannot predict, so we should not be rigid. We have this issue – a document is adopted, and we need to stick to it. We need to be flexible and adapt. Mechanisms for adaptation are crucial.”

“The Strategy was perhaps a bit too much. It should be more flexible to respond to new trends. [For example], COVID-19 showed us that we were not prepared for prevention efforts online. I think it should have mechanisms for adjustment. The humanitarian crisis also shows that a flexible document is required, a roadmap, with an integrated approach. Not comprehensive on activities but on trends. [...] For future, we should learn from the EU experiences – set clear pillars and priorities for intervention, not be so specific on activities, because we don't know what factors will affect it [the policy].”

(From interviews with CT stakeholders)

3.2 Coherence

The Strategy **strongly builds on the achievements of the previous efforts** on prevention and combating THB in the Republic of Moldova. Its core focus is on bringing Moldova's THB response frameworks up to the standard established by the CoE Convention on Action against THB, which also incorporates the standards of the UNTOC and its Protocol. The Strategy and NAPs also reflect the conclusions and recommendations of the major international monitoring instruments in the CT sphere, most notably those of GRETA (2016) and the United States Trafficking in Persons Reports (2017; 2020).

The Strategy considers other priorities of the GoRM in that it establishes **contributing to the implementation of the National Action Plan on the Implementation of the EU Association Agreement 2017-19 and of the National Human Rights Action Plan 2018-20** as one of its core purposes. It does not, however, provide further details. Review of these documents confirms that the adoption and implementation of the Strategy were indeed included as specific activities in these two action plans,³⁸ and that some of the CT NAP activities contributed to the implementation of some of the measures planned under both of these plans.³⁹

³⁸ See Article 16, clause (1)(a), Action SL1 of the National Action Plan on the Implementation of the EU Association Agreement 2017-19 (access: <https://dcfta.md/uploads/0/images/large/plan-de-actiuni-ru.pdf>) and Objective 1 under Area of intervention 3: Preventing and Combating Trafficking in Human Beings of the National Human Rights Action Plan 2018-2020 (access: <https://www.coe.int/t/commissioner/source/NAP/Moldova-National-Action-Plan-on-Human-Rights-2018-2022.pdf>)

³⁹ *National Action Plan on the Implementation of the EU Association Agreement 2017-19*:

Additionally, even though it is not specifically mentioned, the Strategy and NAPs directly contributed to the **SDG 5 target 5.2, SDG 8 target 8.7, and SDG 16 target 16.2**, and indirectly to SDG 1 target 1.3, SDG 8 targets 8.5, 8.6, and 8.8, SDG 10 target 10.7, SDG 16 targets 16.1, 16.3, 16.4, and 16.6, SDG 17 targets 17.9 and 17.17, and others.

The Strategy generally makes **no reference to other relevant policies** which were being implemented in parallel, contrary to the requirement of the normative framework in force at the time of its development.⁴⁰ At the same time, some of the systemic issues identified in the Strategy went beyond its scope (examples: impacts of the administrative and budgetary decentralization on the social services system; overall state of the (public) social services; difficulties in conducting THB investigations on the territories not under GoRM's control), so references to the other relevant national policies would be helpful to explain how they are being dealt with by the GoRM.

The SWOT analysis included in the Strategy **does not discuss supporting or competing priorities** of the Government that can affect the Strategy's implementation. For example, the National Strategy against Violence against Women and Domestic Violence 2018-2023 referred to having the same approach to victims of THB and victims of domestic violence as an issue and proposed to introduce different responses to cases,⁴¹ which is dissonance with the CT Strategy/NAPs' vision of integrating assistance programs for victims of crime. At the same time, the National Strategy to Ensure Equality Between Women and Men for 2017-2021 contained a significant number of supporting, and even overlapping, activities and objectives, such as:

- Activities 12 (bilateral negotiations on social protection with countries of destination) and 13 (integration of vulnerable women in the labour market) under Specific Objective 1.2;
- all activities (access to quality social services; diversification of social services to support needs-based approach; gender equality in social reintegration) under Specific Objective 1.5;
- Activity 2 (enhanced access to quality medical services for persons of all genders and ages) under Specific Objective 1.7;
- Activity 3 (revision of school textbooks) under Specific Objective 1.8;
- Activities 1 (strengthened cooperation among competent authorities) and 3 (information campaigns to prevent violence against women and girls) under Specific Objective 3.2.⁴²

Likewise, the National Strategic Programme in the Area of Demographic Security 2011-2025 contains a number of supporting/enabling provisions among its key areas of intervention, *inter alia*, taking measures to return Moldovans from abroad, creating conditions for domestic employment and entrepreneurship, managing internal migration to balance resources in the rural and urban areas, combating discrimination, promoting integration of vulnerable persons and those at risk of social

Under Chapter 3 Justice, Freedom, and Security: Article 12 Rule of Law, clause (1), Action I3 (Specialization of prosecutors); Article 14, clause (1)(d) (Establishment of an effective preventive policy against [...] trafficking in persons, including means to combat trafficking and smuggling networks, and to ensure protection of victims); Article 16 Preventing and combating organized crime, corruption, and other illicit activities, clause (1)(a), Action SL1 (Development and approval of the National CT Strategy) and Action I2 (Analysis of criminal cases on THB). Under Chapter 27 Cooperation in the area of protection and promotion of the rights of the child: Action I2 (Creation of information and education campaigns to prevent violence against children) under clause 137 and clause 138(a). *National Human Rights Action Plan 2018-2020*: Area of intervention 3: Preventing and Combating Trafficking in Human Beings contains a small number of actions that overlap with those included in the CT NAPs, with slightly different sets of indicators for each of the action.

⁴⁰ Paragraph 15 of the Government Decision No.33/2007. Access:

https://www.legis.md/cautare/getResults?doc_id=23362&lang=ro

⁴¹ See clause 12 under Article 29 of the National Strategy against Violence against Women and Domestic Violence 2018-2023 (access: https://www.legis.md/cautare/getResults?doc_id=101802&lang=ru – see Annex 1)

⁴² See Strategy to Ensure Equality Between Women and Men 2017-2020 (access: https://www.legis.md/cautare/getResults?doc_id=99875&lang=ru)

inclusion, providing effective, needs-based social protection and assistance, promoting social integration and eradicating poverty, etc.⁴³

Other **relevant national policies** that were implemented concurrently with the CT Strategy/NAPs included, *inter alia*:

- National Strategy for Preventing and Combating Organized Crime for 2011-2019 covered THB in general terms only.
- National Strategy on Migration and Asylum for 2011-2020 made a general reference to applying a comprehensive approach to preventing and combating irregular migration and THB with concurrent implementation of measures to protect victims and create favorable conditions for interagency cooperation.⁴⁴ Its Action Plan for 2016-2020⁴⁵ included a number of supporting and overlapping measures in the areas of data collection and analysis, promoting and facilitating safe and orderly migration, diaspora outreach, and capacity building.
- National Strategy for Employment 2017-2021 named victims of THB among persons not attempting to seek employment and living off social payments and identified the poor quality of data, insufficient scope of services, lack of adaptation of such services to the needs of vulnerable populations, and underdeveloped mechanisms for the implementation of relevant laws among gaps that needed to be addressed through its interventions.⁴⁶ This Strategy and its action plan also contained a significant number of measures supporting/duplicating those of the CT Strategy/NAPs, particularly in the area of reducing vulnerability.
- National Strategy for the Protection of the Child 2014-2020 expressed concern over Moldova's status as a significant source of THB and noted some of the achievements in combating THB. It also contains objectives that are supportive of those of the CT Strategy (*inter alia*, specific objective 1.4 (decreasing the negative effects of migration of parents on children left behind) and overall objective 2 (preventing and combating violence, neglect, and exploitation of children) and relevant measures supporting the attainment of these objectives, some of which overlap with the actions planned under CT NAPs (particularly in the area of reducing vulnerability).⁴⁷
- National Action Plan for the (Re)Integration of Citizens of the Republic of Moldova Returning from Abroad for 2017-2020 did not include considerations for victims of THB among the returnees but contained a number of supporting and partially overlapping measures, particularly in the area of diaspora engagement, multidisciplinary mechanism for the support of returnees, and economic (re)integration (employment, (re)training, development of entrepreneurship).⁴⁸
- National Programme for Social Integration of Persons with Disabilities 2017-2022 did not refer to trafficking and exploitation as threats to persons with disabilities and include specific measures to address these issues; however, it contained measures supportive of reducing their vulnerability to these phenomena.⁴⁹
- Action Plan for the Support of Ethnic Roma Population of the Republic of Moldova for 2016-2020 did not refer to THB as a significant risk for the ethnic Roma and did not include measures to address this issue, however, it contained a number of actions supporting the CT Strategy,

⁴³ See paragraphs 91, 94, 95, 97(a), (e), (f), (h), (i); Access: https://www.legis.md/cautare/getResults?doc_id=33221&lang=ru

⁴⁴ See Chapter 25 Combating Irregular Migration and THB – Measure 1 in the National Strategy in the Areas of Migration and Asylum 2011-2020 (access: https://www.legis.md/cautare/getResults?doc_id=56020&lang=ru)

⁴⁵ Access: https://www.legis.md/cautare/getResults?doc_id=110253&lang=ru

⁴⁶ See p.31 of the National Strategy for Employment (access: https://www.legis.md/cautare/getResults?doc_id=98639&lang=ru – see Annex 1)

⁴⁷ Access: https://www.legis.md/cautare/getResults?doc_id=18628&lang=ru

⁴⁸ Access: https://www.legis.md/cautare/getResults?doc_id=101865&lang=ru

⁴⁹ Access: https://www.legis.md/cautare/getResults?doc_id=101863&lang=ro (see Annexes 1 and 2)

particularly those aimed to decrease the vulnerability of the Roma and improve their access to identity and other documents.⁵⁰

- National Strategy for the Development of Education for 2016-2020 notes the progress achieved in instituting procedures for the identification of and intervention in cases of violence, trafficking, and exploitation of children, and included further measures to strengthen the implementation of the relevant normative framework.⁵¹
- National Strategy for the Development of the Youth Sector for 2015-2020 and its Action Plan did not mention trafficking in persons as a specific risk for young people in Moldova, however, discussed at length the vulnerability of young people on the labour market and the high interest in domestic and external labour migration among them. The Strategy and Action Plan contained a number of enabling interventions for the CT Strategy/NAP, including increased access to information, promotion of healthy lifestyle, as well as youth employment and entrepreneurship.⁵²
- Other general and specialised strategies and programs.

Analysing synergies with these strategies and programs at the Strategy design stage could have helped optimize the use of resources, avoid duplication of effort of the responsible authorities, and close the gaps in the CT NAP interventions vis-à-vis identified issues by making references to the relevant efforts included in other policy documents.

Case study: Planning overlapping interventions

The CT Strategy noted an increase in child begging, particularly in Chisinau, and proposed to develop a mobile service for early identification of THB (without specifying whether it would be focusing on forced begging by children or attempt to detect all types of victims). Relevant activities were included in the 2018-2020 NAP. However, during a meeting of the Technical Coordinating Group of the Permanent Secretariat to the NCCTHB on June 22, 2018, it was discovered that a service for street children was already planned in the 2016-2020 NAP supporting the implementation of the National Child Protection Strategy 2014-2020. Both documents predated the CT Strategy and NAP. It was further revealed that a Street Assistance Service project to identify and combat begging, vagrancy, prostitution, and consumption of toxic/narcotic/psychotropic substances among children was developed by the Municipal Directorate for the Protection of Children's Rights of the Chisinau Municipal Administration and had been recently submitted for approval to the Chisinau Municipal Council. Consequently, responsible stakeholders considered any further interventions in this area unnecessary, and the relevant activity planned in the 2018-2020 NAP (3.1.3) was marked as “partially achieved” in the respective national reports.

The case demonstrates the importance of analysing relevant policies that are being developed or implemented concurrently at the strategy/ program/ action plan design stage to avoid duplication of effort and identify supporting interventions.

At the same time, this analysis would have shown the Strategy developers that **preventing and combating THB had not been sufficiently mainstreamed** in policy documents addressing issues adjacent to THB, which would have, in turn, reinforced the relevance of a distinct CT Strategy/NAPs.

A small number of the stakeholders, particularly those not specialising in anti-trafficking, interviewed for this evaluation expressed their concern over the overlaps contained in the CT Strategy/NAP with other concurrent policies and normative framework. For these actors, the CT Strategy/NAP was not an important guiding document and was viewed as secondary to the policy documents in their main areas of specialisation. They also tended to view the need to report on CT activities as a bureaucratic burden and to present their regular activities, or those implemented as part of other action plans, as those contributing to the CT NAPs. In one case, a stakeholder mentioned that if did not complete an important task under the CT Strategy/NAP, they had the flexibility to accomplish it as part of other

⁵⁰ Access: https://www.legis.md/cautare/getResults?doc_id=110246&lang=ru

⁵¹ Access: https://www.legis.md/cautare/getResults?doc_id=55069&lang=ru

⁵² Access: https://www.legis.md/cautare/getResults?doc_id=49195&lang=ru (see Annexes 1 and 2)

policy documents with longer timelines. Many of the interviewed stakeholders commented on the **excessive number of strategies, programs, and action plans** that required their attention, and suggested that policymaking should be generally streamlined to focus on a small number of strategic priorities.

“We have our program and ‘our’ laws, we get results there [...]. The result of the implementation of these laws always go into the reports on the [CT] Strategy. The role of the Strategy is secondary for us. If [it was not there], we would still have our [other policy documents], there is certain duplication.”
“There are too many strategies, we were [included as implementers] in several. On paper, it looks good, but when it comes to implementation, it looks like that picture where one person is digging and seven are watching. [...] We should not develop strategies just to have them in place, knowing we cannot implement and waste our time writing why we couldn’t implement.”
“Our work would have been done without the Strategy and Plan, but monitoring is there thanks to [these documents], we can summarise and make conclusions, see strength and weaknesses.
“We have more than 300 plans, you cannot do good monitoring. And it is admin resources that are being used up. We have to report on something every day, we don’t have time to do the work.”

(From interviews with the Strategy/NAP stakeholders)

A review of the available⁵³ **agency-level action plans** suggested inconsistent incorporation of the activities planned in the CT NAPs, which reflects the generally voluntary nature of Strategy/NAP implementation by stakeholders, as discussed above. The General Prosecutor’s Office appears to be the only agency to put in place a *distinct* institutional action plan to implement the 2021-2022 CT NAP.⁵⁴ The agency considered this step necessary to mobilise prosecutors and other law enforcement authorities with CT responsibilities to achieve better results, which, in its view, had a positive impact, including on the dynamics of criminal investigations and increasing the focus of actors who investigate criminal cases on the protection of victims of THB and respect for their rights.⁵⁵ The findings of this evaluation (see section 3.5 Impact below) support this assertion. While this may not be necessary for all stakeholders, key Strategy/NAP implementers could take steps to improve coherence between their respective agency’s operational plans and CT policy documents in future, including by learning from the GPO’s experience.

3.3 Effectiveness

The Strategy/NAP do not indicate priority outputs, although the **annual National Reports regularly highlighted key achievements**.

The approach towards self-assessing outputs as “achieved” in the NAP reporting is, however, sometimes formal and not necessarily in line with the essence of the expected results. For example, Activity 3.1.6. “*Establish the mechanism for the recording of the victims and presumed victims of THB, who have had a reflection period of at least 30 days, as provided for by the regulatory framework*” is marked as “Achieved”, because it was reported that CAP maintains a database that includes victims who have benefited from both residential and daycare services, which, however, does not constitute the desired mechanism to collect data on persons availing themselves of the reflection period.

⁵³ The availability of annual action plans on agency websites differs significantly across public authorities of Moldova.

⁵⁴ Order of the Prosecutor General No.6/2-97 of 29.12.2021

⁵⁵ Report of the Republic of Moldova on the implementation of the Recommendations of the Committee of the Parties to the Council of Europe Convention on action against trafficking in human beings and those included in Annex 1 of the GRETA Report. National Committee for Combatting Trafficking in Human Beings. Chisinau, 2022, p.16 (provided by the State Chancellery of the Republic of Moldova)

Reporting is done in three different modes at the same time: sometimes, stakeholders report on activities (with a varied level of detail), sometimes on output indicators, and sometimes on outcome indicators (included in the NAPs as output indicators). There is occasional cross-posting of information between different activities/ outputs, i.e. same activities reported under different objectives in different years (examples: Activity 2.1.8 in 2019 and Activity 2.2.5 in 2018; Activity 1.3.16 in 2020 and Activity 1.4.5 in 2019), or under several activities in the same year (this is particularly true for the 2020 NAP report), predominantly due to **activity- rather than result-based reporting**.

Furthermore, the data provided in National Reports (presentation, level of detail, connection to planned activities and outcomes) is not always consistent from year to year. In a small number of cases, the information on the implementation of activities/delivery of outputs is altogether irrelevant to the essence of the planned intervention, which can point to a lack of understanding of the Strategy/NAP, or its parts, by some of its implementers and/or the agency compiling the national reports.

Table 9. Example of inconsistent reporting on an activity

Activity	2018 Report	2019 Report	2020 Report
1.4.5. The implementation by the territorial social assistance bodies of the "Social Services" module within the "Social Assistance" automated information system	No action reported	IOM, in partnership with the National Assistance Agency (ANAS) and MLSP, organized a series of coordination meetings to develop the e-learning system for ANAS and the training course in the field of preventing and combating THB for social workers. In December 2019, IOM selected and contracted the IT company that will develop the necessary IT platform for ANAS and translate the training course for social workers into IT format. The IOM is to contact a group of national experts in order to develop the mentioned course between January and April 2020. The piloting of the e-learning platform and the respective course is to take place during 2020	The "Social Assistance" Automated Information System (SIAAS) [...] is implemented by the territorial social assistance structures only on the social assistance module and/or assistance for the cold period of the year. Regarding its implementation in the part related to the "Social Services" module within the mentioned system, [...] it is currently inapplicable for technical reasons.

All of these factors, together with the lack of targets for most outputs, make any assessment of the extent to which the outputs were achieved, imprecise and subjective.

A review of the national reports against planned activities suggests that:

- over half (60%) of the 2018-20 NAP and about 40 per cent of the 2021-22 NAP were implemented;
- a fifth (20%) of the 2018-20 NAP and over a quarter (28%) of the 2021-22 NAP were partially implemented (or some progress was made); and
- a fifth (20%) of the 2018-20 NAP and a third (31%) of the 2021-22 NAP were not implemented (no progress made).

Based on the available information, some of the **most notable outputs** produced through the implementation of the NAPs include:

- ✓ Establishment of a specialized service for male victims and potential victims of THB;
- ✓ Improved repatriation procedures and practices;
- ✓ Important amendments to legislation and development of supporting guidelines;
- ✓ Annual national CT campaigns to raise public awareness reaching a wide audience nation-wide;
- ✓ Several useful studies produced;

- ✓ Introduction and consistent implementation since 2018 of two mandatory curricula for schools, which include THB and related topics;
- ✓ Progress made on equipping children and young people with tools and resources to prevent sexual exploitation and abuse;
- ✓ A considerable number of trainings, especially multidisciplinary, on acute THB-related issues held for a vast variety of audiences, particularly law enforcement authorities;
- ✓ Efforts to enhance cooperation and exchange of information among stakeholders, particularly among different law enforcement agencies (CCTiP, General Inspectorate of Border Police, Bureau for Migration and Asylum, GPO, etc.); between CCTiP, State Labour Inspectorate, National Employment Agency, and the Public Services Agency; between law enforcement agencies and social service providers, etc.;
- ✓ Progress made in the area of financial investigation within THB criminal investigations;
- ✓ Progress made on international cooperation in the spheres of employment and social protection, as well as the law enforcement sphere.

Only some of the outputs produced as a result of the NAPs implementation (research reports, guidelines) were available for review at the time of writing. Those were mostly produced with the support of development partners and are of high quality. There is no conclusive evidence, however, that the research, assessments, recommendations, and non-mandatory guidelines produced through the implementation of the NAPs continue to be actively used by their target audiences.

The **lack of appropriate quantitative and qualitative indicators** capturing, for instance, the change in participants knowledge, attitudes, and skills, and of the corresponding data, does not allow for an objective evaluation of the quality of trainings delivered. In the case of specialised trainings, particularly those organised for criminal justice practitioners, based on the information available from the national reports, training topics addressed acute THB-related issues, and prominent international and national experts were involved in the development and delivery of content. Interviewed stakeholders indicated that the staff of their respective agencies who participated in the trainings and was retained afterwards applied the gained knowledge and skills in their work.⁵⁶ Multidisciplinary trainings in particular received high praise from multiple sources. At the same time, the e-learning modules produced through the NAPs implementation were not in use at the time of the evaluation (the relevant module that was being developed for ANAS had never been finalized and launched,⁵⁷ and the module for the General Inspectorate of Border Police not systematically used due to the lack of access to it outside of the Inspectorate's Centre of Excellence⁵⁸).

Similarly, the lack of appropriate indicators⁵⁹ and relevant data does not allow to conclusively assess the quality of services provided as part of the Strategy/NAPs implementation. A brief visit to CAP and review of various information materials/resources by the evaluator revealed a similar (or greater) level of quality as in contexts similar to Moldova.⁶⁰ The services, including residential programs and information services, offered through the existing protection and assistance centres as well as governmental and non-governmental service providers continued to be available to victims and potential victims of THB through state and international funding at the time of the evaluation.

⁵⁶ Interviews with CCTiP, General Inspectorate of Border Police, GPO, ANAS

⁵⁷ Interviews with IOM and ANAS

⁵⁸ Interview with the General Inspectorate of Border Police

⁵⁹ For example, at the output level, such indicators could capture levels of satisfaction of beneficiaries with services or feedback received through focus groups, and at the outcome level, changes in perception of THB among target audiences, or in the quality of lives of persons who received assistance.

⁶⁰ Subjective assessment based on the evaluator's experience.

As discussed in detail above, the **lack of systematic inclusion of outcome indicators and targets**, the general wording of many of the outcomes, and formulation of outcomes as outputs or activities, as well as deficiencies in data collection and reporting (activity- vs. result-based), in many cases make it difficult to connect the delivery of outputs to the achievement of outcomes. While varied research on THB-related topics is conducted in Moldova, including within the framework of the NAP implementation, it has not been used by the Strategy/NAP stakeholders as a systematic tool to monitor progress.⁶¹

Some of the output indicators included in the NAPs could be considered “targets” (e.g. “*Law amended*”, “*Campaign conducted annually*”, “*Centralised databased adjusted*”, “*E-course developed and piloted*”, etc.). Most of these targets appeared realistic on their own. However, in the context of the entire scope of interventions planned under the NAPs, it is possible that meeting them could be challenging for the stakeholders, particularly taking into account the difficult context. Correspondingly, of such “targets” that could be found in the NAPs, less than a half have been met (some 60% in 2018-20 and 30% in 2021-22), the rest remained unmet at the time of writing.

The limited evidence available from the national reports and other consulted sources demonstrates that **progress, to a different extent, has been made towards most of the expected outcomes**, particularly:⁶²

Table 10. Outcomes towards which the most notable progress was achieved

Outcome	Evidence of progress towards outcome
1.2. b) Definitions, notions, regulations adopted to reflect new forms of exploitation, criminalisation of begging by adults	Law on Preventing and Combating THB amended to clarify some definitions (presumed victim of THB, sexual exploitation, commercial and non-commercial sexual exploitation). Articles 165 and 206 of the Criminal Code amended to include diversified forms of exploitation and update recruitment methods. Provisions of the Contravention Code amended to clarify issues of practicing and using services of prostitution. Solid progress achieved in introducing amendments to Articles 175` and 208` of the Criminal Code to harmonize it with the Lanzarote Convention; to Article 89 of Contravention Code to harmonize it with Article 6 of the Warsaw Convention and in response to the Report of the UN Committee on the Elimination of Discrimination against Women; and to Articles 165 and 206 of Criminal Code to further amend penalties applied for THB and trafficking in children.
1.3. b) Specialists of the law enforcement agencies who carry out the investigation, criminal prosecution, and trial of THB cases have the necessary professional skills	Interviewed non-law enforcement stakeholders commended the work of specialised criminal justice chain practitioners, particularly noting that the latter have increased the application of human rights-based approaches and developed a better understanding of victim profile. ⁶³ Evidence available from the national reports indicates 100% increase in staff allocation within specialised prosecution authorities and consistent effort of law enforcement agencies to enhance cooperation with other stakeholders, such as the MLSP, Public Services Agency, State Labour Inspectorate, social services, NGOs, and others, as well as international cooperation. Interviewed law enforcement authorities pointed to the increased uptake of progressive practices, such as interviewing victims/witnesses with the use of video recording and of children using specially equipped rooms, implementing recommendations to decrease the revictimization and stigmatization of victims, conducting psychosocial assessment of victims as part of the investigations, addressing suspected witness tempering, and involving civil society experts to support vulnerable victims/witnesses through the process, which help improve the consistency and reliability of testimonies and improved the quality of

⁶¹ An example of research that is consistently conducted to monitor progress/ developments in a certain area is the Human Trafficking Surveys commissioned by IOM every two to three years in Belarus, Moldova, and Ukraine, using the same methodology to estimate the prevalence of THB, assess the level of awareness and risks, and identify vulnerable groups.

⁶² Excluding outcomes formulated as outputs or activities

⁶³ Interviews with IOM, MLSP, National Employment Agency

	investigation process.
2.2. b) Access of potential emigrants to the national and foreign labour market facilitated under fair and protected conditions	The National Employment Agency statistics shows a continuous increase in the number of registered individual employment contracts, indicating a positive trend in legal employment abroad. Increased availability of information for jobseekers along with improved regulation and increased control over the work of private employment agencies contributed to the enhanced protection of the rights of persons using their services. ⁶⁴ The bilateral agreements on the employment of Moldovan citizens abroad (Israel, Bulgaria) render concrete results, and more such agreements are being negotiated/piloted (Germany). Consistent effort is made to conclude agreements with key countries of destination on social protection of migrant workers. Progress in this area is also noted in the Ex-Post Evaluation of the National Strategy in the Area of Migration and Asylum for 2011-2020. ⁶⁵
3.3. a) (Public) social services developed, including financial resources appropriated for these purposes	An Assistance and Protection Service for male victims and potential victims of THB was established through an international development project and taken over by the GoRM within a relatively short period of time. The Service was formally launched in 2021 and that year, already 17 men received comprehensive residential assistance.
4.1. e) The procedure for conducting financial investigations in order to confiscate the assets acquired as a result of the committed THB [in place]	The financial investigation tool developed through international partner and donor support was adopted by the General Prosecutor's Office as mandatory and applied. The number of financial investigations is increasing, as is the scope of seized assets.
5. a) International investigations carried out, including by joint investigation teams	Annual increase in the number of international investigations and established joint investigation teams that produce concrete results reported. Positive trends observed in the volume of mutual legal assistance requests sent/received/processed and non-Moldovan suspects extradited by other states.

Two **unforeseen positive outcomes** of the Strategy/NAPs implementation reported by interviewed stakeholders were:

- the adoption as a mandatory tool by Order of the Prosecutor General of a methodology for asset recovery, which was an unplanned extension of the work done on financial investigations;⁶⁶
- the use of the e-learning platform created for ANAS by IOM to host the training course on THB for other courses (on domestic violence, child protection) that are being developed by ANAS in cooperation with other agencies.

A potential unforeseen positive outcome is the extension of the guidelines and training on the referral and assistance of victims of THB developed by the MLSP for territorial employment agencies, to include victims of domestic violence and other vulnerable women (to be supported through a project on economic empowerment of women implemented under the auspices of a UN agency).⁶⁷

Admittedly, the described progress towards Strategy outcomes cannot always be conclusively attributed to the activities implemented solely as part of the CT NAPs. Often, it is a result of the implementation

⁶⁴ Interview with the National Employment Agency

⁶⁵ Cebotari, M. Ex-Post Evaluation of the National Strategy in the Area of Migration and Asylum 2011-2020 approved by Government Decision No.655 of 08-09-2011. Chisinau, 2021 (provided in Romanian by the State Chancellery of the Republic of Moldova).

⁶⁶ Interviews with IOM, GPO

⁶⁷ Interview with MLSP

of other concurrent policies, sometimes those of greater priority to the stakeholders, of the overall development effort in the Republic of Moldova, as well as of enabling external factors, such as increased cooperation and integration with the EU. This was confirmed by the key Strategy stakeholders interviewed in the course of the evaluation.

“We now see more trust from the EU. Since last year, we started receiving extraditions [of non-Moldovan nationals] from the Member States. That never happened before. It is thanks to the overall improvement of the human rights protection within criminal justice process here [in Moldova].”

(From interviews with the Strategy/NAP stakeholders)

Some of the outputs rendered the expected outcomes only in modest scopes to date, two of the most prominent examples being the changes to the normative framework made to ensure access of victims of THB to free legal aid and inclusion of victim and potential victims of THB among groups in need of extended employment support. The uptake of both services by the final beneficiaries remained low throughout the Strategy/NAP implementation. In the case of legal aid, that was attributed by the interviewed stakeholders⁶⁸ to its insufficient quality, along with the effects of the COVID-19 pandemic on Moldova’s judicial system, and in the case of registration for employment support by victims/potential victims – to the lack of interest among beneficiaries, fear of stigma, and barriers existing due to the lack of harmonisation across the normative framework,⁶⁹ among other factors. This can be a result of poor problem analysis at the Strategy design stage, of limited inclusion of the perspective of the final beneficiaries and target groups from the local level, as well as of the lack of analysis of assumptions at the Strategy design stage.

In a number of cases, available evidence suggests that little or no progress has been made towards the expected outcomes where all or most of the respective outputs are considered to have been delivered, namely:

Table 11. Outcomes unattained despite produced outputs

Outcome	Evidence of the lack of progress towards outcome
3.1. b) Mechanism set up and clear competencies established for line institutions to assign the status of presumed victim of THB	Despite being marked as “partially achieved” in the relevant national report, the outputs produced did not lead to the expected outcome, and no institution was assigned competencies and provided with clear mechanisms for granting the status of presumed victim of THB. The issue of status remained unresolved upon expiration of the Strategy. Although MDTs are authorised to identify persons as victims of potential victims of THB, in practice, persons continue to require law enforcement confirmation of identification to access state-funded assistance. ⁷⁰
3.1. e) Capacities of specialists from the relevant institutions to identify victims amongst aliens, especially refugees and asylum seekers, strengthened	The Bureau of Migration and Asylum developed relevant guidelines; however, the trainings for frontline practitioners did not take place, and there is no evidence of (potential) victims having been identified among aliens, refugees, and asylum seekers to date.
3.1. d) Presumed victims of THB have a reflection period of at least 30 days in accordance with the provisions of the legal framework	The reported outputs do not appear to be relevant for the achievement of this outcome. No evidence is presented in the national reports on victims availing themselves of the 30-day reflection period in the meaning of the term established by Article 13 of the CoE Convention on Action against

⁶⁸ Interviews with IOM, MLSP

⁶⁹ See Fomina, T., Bulat, A., Moraru-Cilimar, R. Analysis of the normative framework and practice of providing services, aimed at the social (re)integration of victims of trafficking in human beings in the Republic of Moldova. IOM, 2022 (provided by the IOM Mission in Moldova)

⁷⁰ Interviews with service providers; United States Department of State Trafficking in Persons Report (2020).

and their monitoring is ensured	THB.
3.3. c) Programs for the development of entrepreneurial skills and (re)integration of victims and presumed victims on the labour market implemented	Despite the relevant outputs being marked as “achieved” in the respective national report, only one victim of THB was reported to have participated in the relevant state-sponsored program, while other such beneficiaries continue to access this type of assistance through programs funded by international partners.
3.3. e) People with hearing disabilities informed about THB, its consequences and their rights to assistance and protection in this context	Relevant activities were planned for 2018-20, and the output was marked as “achieved” even though only one training was organised for professionals who provide assistance to people with hearing impairments on the risks and consequences of THB. There is no data on whether this led to the attainment of the expected outcome.

No traceable progress has been made on the following outcomes:

Table 12. Outcomes towards which no progress was made

Outcome	Justification
1.1. b) Professional enhancement of the National Coordination Unit’s capacity within the NRS	No specific interventions were planned in the NAPs to achieve this outcome. At the time of the evaluation, the capacities of the National Coordination Unit further decreased, including due to staff shortages
1.3. e) Financial resources budgeted for training of specialists	Elements of training on THB were reported to have been included into state-run curricula for education and criminal justice practitioners. However, no funding has been allocated by the GoRM towards specific and specialised training and re-training on THB. The financial burden for this continues to be shouldered by the development partners and international donors.
1.4. b) Functionality of the Social Assistance module from the SAAIS ensured	As demonstrated above, attaining this outcome is largely outside of the scope of the CT Strategy. As of the latest national report where this issue was included (2020), the module remained inactive for technical reasons. Relevant activities were not extended to the 2021-22 NAP.
3.3. d) Mechanism for referring NRS beneficiaries to competent specialists enhanced and effective cooperation between the three levels of the NRS (community, district and national)	The planned actions were not implemented, particularly due to the adoption of the new National Referral Mechanism for the Protection and Assistance of Victims of Crime and the expectation that all relevant normative acts and interagency mechanisms would be revised in line with the new vision.
4.1. d) CCTiP directly subordinated to the head of the GPI of the Ministry of Interior and the institutional development strategy approved	Outcome not achieved due to changes in the organisation and operation of the General Inspectorate of Police. The CCTiP continues to be the lowest level unit within the Ministry and is required to coordinate all of its actions with the General Investigation Inspectorate, General Inspectorate of Police, and the Ministry’s senior level.
4.3. a) Functional mechanism of compensation and reparations for victims of THB	The mechanism remains inaccessible to victims. No compensations have been paid since its establishment.

Additionally, the following **outcomes formulated as activities/outputs** do not appear to have been achieved, mainly because the relevant actions were not included in the NAPs or not implemented:

- Specialists trained in planning the mid-term budgetary framework and next year's budget, and in attracting external sources;
- Instructions for employment and observance of social rights and working conditions of employees (agriculture, livestock and construction) developed;
- Methodologies developed and expenditure rules approved for specialised social services for victims and presumed victims of THB;

- Information program for processing the data on criminal cases in the renewed CCTiP and specialists trained how to use this program;
- Media representatives trained how to cover topics related to the prevention and combating of THB.

Activity-based reporting also makes it difficult to trace progress towards **solving identified issues**, particularly where systemic needs/gaps are concerned, including for reasons discussed in section 3.1 above.

Table 13. Example of unclear connection between achievement of outputs/outcomes and solving an identified problem

Problem identified in the Strategy	Expected outcome	2018 Report	2019 Report	2020 Report
Low level of reintegration of victims into the labour market	Programs for the development of entrepreneurial skills and (re)integration of victims and presumed victims on the labour market implemented	15 educational institutions contracted to train on 39 professions/trades. 2,215 unemployed persons graduated from vocational training courses, incl. 32 graduated from courses in the management specialty (the basics of entrepreneurship); 34 were persons with disabilities and one victim of THB.	The National Employment Agency implements entrepreneurial and professional skills development programs for all categories of unemployed. Ten such persons registered with the territorial employment agencies graduated from management courses (basics of entrepreneurship). No victims of THB were registered as unemployed in 2019.	Three victims of THB were registered as unemployed citizens; none of them participated in professional training courses. The Organization for Small and Medium Enterprises managed ten entrepreneurship support programs. 29 businesses managed by vulnerable persons, were approved for funding. IOM, through NGO CNFACEM, continued to assist victims of THB with professional training programs and starting small businesses. Due to the COVID-19 pandemic, IOM redirected some funds to assist 19 vulnerable migrants (nine women, eight men, and two children) with return and/or reintegration. Beneficiaries received grants in the form of special tools or equipment for micro-entrepreneurship or self-employment.

This can be an indication of:

- poor problem analysis, including due to it being unsubstantiated by research or data and the lack of involvement of and consideration of needs/ interests of the final beneficiaries (among other factors as discussed above), and inadequate formulation of response;

- a result of the lack of appropriate output and outcome-level indicators and the corresponding poor monitoring and reporting practices; or
- a combination of both factors.

The apparent weakness of the application of results-based approach in policy design, implementation, and monitoring creates a situation where a lot of effort is being made and reported on, with unclear results/ impact vis-à-vis identified needs/gaps. Essentially, **most of the problems identified in the Strategy document appear unresolved** upon its expiry, either due to their systemic nature, insufficiency of the planned and implemented efforts, changed circumstances, or external factors.

There were two **major developments in the CT sphere** within the Strategy implementation timeframe that had not been planned but significantly influenced the attainment of expected outcomes. One was the adoption of the legislative framework establishing a new National Referral Mechanism for Victims of Crime (NRMV) that largely builds on the achievements of the NRS for victims/potential victims of THB and integrates several other mechanisms created for other types of beneficiaries. The other was the specialization of judges on THB, which, however, was later reversed. The effect of the first development appears to be that most of the NRS-related issues remained largely unaddressed (and relevant activities unimplemented), as the main stakeholders were expecting to transition to the new mechanism. No significant effects of the second development were observed on verdicts on THB cases issued based on the information available as of the date of writing. Additionally, the establishment of ANAS under the MLSP was noted by interviewed stakeholders as an enabling development for the CT sphere. It, *inter alia*, facilitated the creation of the service for male victims of THB, the support of CAP, the provision of services to persons considered potential victims of THB (such as victims of domestic violence and stranded migrants), and the mainstreaming of THB prevention into non-THB specialised residential programs (e.g. those for persons with disabilities).

The production of a significant number of outputs, and the attainment of respective outcomes, were gravely affected by **negative external factors**, particularly the COVID-19 pandemic and the full-scale Russian invasion of Ukraine. Both of these events triggered serious consequences in all areas of public life in Moldova, including, *inter alia*, the economy, migration flows, and the functioning of governmental, non-governmental, and private institutions at all levels, and created new threats for the society, including those related to THB.

The Strategy/NAP **stakeholders adapted to the new context** and were able to continue their work despite their drastically reduced capacities, options, and available resources.

Throughout 2020-2022, in view of the pandemic restrictions, many of the planned activities (trainings, awareness raising activities) were conducted online, which, in the assessment of many of the interviewed stakeholders, made these interventions generally less effective (decreased focus of participants, lack of opportunities for networking, etc.). According to the 2020 National Report, “*criminal investigation authorities, law courts and prosecutors' offices adapted their activities to the conditions imposed by the state of emergency declared at national level, in order to carry out the necessary activities related to the ongoing criminal cases [...]*”, which ensured that, although the number of new investigations of THB initiated in 2020 decreased by half, the number of cases submitted to courts was kept at the level of 2019. CAP continued to assist victims and potential victims on site and increased provision of telephone and online services. New activities were included in the 2021-22 NAP to address the emerging/growing threats associated with the increased presence of young people online.

In 2022, many stakeholders reoriented most of their resources towards responding to the multiple crises triggered by the war in Ukraine, particularly the largest movement of refugees in Europe since World

War II. Many had to deprioritize activities planned under the 2021-22 NAP, while others were able to implement previously postponed activities thanks to additional resources made available through humanitarian and development partners to respond to the crisis. Residential programs for victims/potential victims of THB made adjustments to accommodate refugees and third-country nationals (TCN). Training programs and awareness raising efforts are being adjusted to focus on the THB threats resulting from the crisis. A separate action plan was developed by the Anti-Trafficking Task Force operating under the Moldova Refugee Protection Sector to respond to the identified risks, implement the newly-issued international recommendations in this area, and coordinate the efforts of state agencies, NGOs, and humanitarian partners. New (previously unplanned) normative framework regulating exit from Moldova of children arriving from Ukraine was put in place, *inter alia*, to prevent their trafficking, and social services are being developed to ensure appropriate assistance and protection for those staying in the country. At the same time, despite most international observers' repeatedly expressed concerns over the multifold increase in trafficking risks, particularly in connection with the mass displacement of population from Ukraine, no cases of THB connected to the crisis with refugees/TCNs had been identified as of the time of the evaluation.

3.4 Efficiency

Leadership in coordination of the national policy in CT sphere has been a **key issue** in the course of the Strategy/NAP implementation, which was also noted by many of the interviewed stakeholders. The Strategy emphasizes and supports a strong coordination role for the CT policies within the GoRM by including coordination of the prevention and combating of THB among its main sub-areas of intervention, with the goal of “*ensuring the implementation of the national policy in the sphere of prevention and combating of THB on the basis of effective coordination and strengthened cooperation with implementing partners.*”⁷¹ However, the NAPs do not include sufficient action to solidify the leadership and operational coordination functions or to address identified issues in this sphere.

The NCCHTB, due to its high-level nature, has not been a platform facilitating efficient implementation of the Strategy/NAP. It is also not in the position to give an objective assessment to its outcomes and impact.⁷² The relevant functions were *de facto* performed by the Permanent Secretariat of the NCCTHB, and as of September 2018, its successor – the Directorate for Coordination in the Field of Human Rights and Social Dialogue of the State Chancellery of the Republic of Moldova. The Department as a new structure was not fully operational until the second half of 2019, as it took time to fill in vacant positions and for the staff to settle into their jobs. Since then, the capacities and resources of the Department to effectively perform the coordination, oversight, monitoring, reporting, and other related functions with regard to the Strategy/NAP implementation have been assessed as insufficient, and its situation precarious.⁷³ Both issues remained unresolved throughout 2018-22, and the staff shortage within the Directorate for Coordination in the Field of Human Rights and Social Dialogue became even more acute in 2021-22.

⁷¹ National Strategy for Preventing and Combating THB for 2018-2023, Annex Nr.1 to the GoRM Decree Nr.461 of 22 May 2018, chapter III, pp.22-23

⁷² See Antonova (2020)

⁷³ Ibidem

“When the Permanent Secretariat had staff that was responsible for counter-trafficking only, things were more focused, and we felt there was leadership. Now, it is more diluted. [...] We have a lot of trust, and everyone knows everyone in the counter-trafficking community. It is based on personal connections. But if they [the connections] were not there, it is hard to imagine how things would be done.”

“I do not have any issues with the work of the Secretariat. They could be more proactive, have more initiative, [...] we could meet more often. There are issues that are being discussed, but there is no follow up. It might not be the fault of the Secretariat, there is too much work and too few people. They don't have enough time to do things, especially after the reform.”

“In trafficking, there was always some kind of result, unlike with [some other] strategies, because there is the Committee [NCCTHB] and the Permanent Secretariat pushing this agenda forward. When the Secretariat was downsized, everything stalled, they simply cannot handle the workload. [...] We consolidate information and send to them, but there is no feedback.”

(From interviews with the Strategy/NAP stakeholders)

Furthermore, the political instability throughout 2019, the COVID-19 pandemic in 2020-21, and the multiple crises resulting from the war in Ukraine affected the operation of all governmental agencies and made it more difficult to convene the consultative bodies within the sphere of responsibility of the Directorate for Coordination in the Field of Human Rights and Social Dialogue as well as to mobilize governmental stakeholders. As a result, even though the NCCTHB is expected to meet at least on a quarterly basis,⁷⁴ in 2019-2022, it convened rarely, with large intervals between meetings.

“Recently, there was a proposal to reorganize the structure [of counter-trafficking response]. We [...] said that the current mechanism should stand, as it is the one we put in place as a result of recommendations from international partners [...]. Changes may trigger negative impacts. [...] Maybe it needs a little push, to have the meetings more often, at least twice a year. There are objective reasons why it [NCCTHB] did not meet in 2019-2021. It was a significant gap and should not have happened.”

(From interviews with the Strategy/NAP stakeholders)

Structures were in place for **operational exchange and coordination** among key stakeholders (such as the technical coordination meetings held under the auspices of the OSCE Mission in Moldova and the technical working group under the Permanent Secretariat of the NCCTHB). However, their functionality declined over the period of the Strategy/NAP implementation for various contextual reasons (reforms in the State Chancellery, COVID-19 pandemic). Many interviewed stakeholders noted that, with the exception of the law enforcement sphere where cooperation and communication on operational matters reportedly improved,⁷⁵ in all other areas those had become less efficient.

At the **local level**, where most victims of THB and persons at risk reside, the deterioration of leadership in the CT sphere had a particularly negative effect. District authorities continued to lack capacities, motivation, and/or knowledge to develop and implement local CT action plans in line with the National Strategy/NAPs, including due to the lack of financial and human resources.⁷⁶ TC THB continued to require guidance and support from the center, as many perceive the Strategy/NAP as too complicated, voluminous, and too difficult to use it as a reference, along with information on the THB trends, as well as ideas and resources for awareness raising activities. Few proactively seek relevant advice and support on their own unless constantly mobilized from the center.⁷⁷ Members of the TC THB consulted

⁷⁴ Paragraph 13 of the Government Decision No.472/2008 on the Approval of the Composition of the National Committee for Combating Trafficking in Human Beings and the Regulation on the National Committee. Access: https://www.legis.md/cautare/getResults?doc_id=23592&lang=ro

⁷⁵ Interviews with CCTiP, Bureau of Migration and Asylum

⁷⁶ Focus group with members of TC THB

⁷⁷ Antonova (2020)

in the course of the evaluation noted the lack of opportunities for them to meet with the national authorities and each other in the course of the Strategy/NAP implementation, lack of clear criteria to evaluate the quality and effectiveness of their work, lack of feedback from the central level, and insufficient consideration of their perspective in the national policies. At the same time, they positively remarked on the multidisciplinary nature of the TC THB and the opportunities for training that they received through the Strategy/NAPs.

Additional issues affecting the efficiency of law enforcement response in relevance to the Strategy/NAPs were brought up by CCTiP. The CCTiP's current subordination status within the Ministry of Interior (an issue brought up but unresolved by the Strategy/NAPs) has reportedly affected its ability to contribute to policy formulation and implementation and slowed down its reaction to requests and reports from other governmental agencies. The lack of regular representation at the local level has meant that CCTiP is forced to rely for the detection of THB on district police and social assistants who do not report to the CCTiP and have uneven levels of knowledge, capacities, and motivation. This results in some districts never having THB prosecutions in a situation where risk analysis suggests that THB is present nation-wide. CCTiP was also concerned by the NAPs assigning to its staff some uncharacteristic tasks in the sub-area of awareness raising, which created an additional burden on its already overstretched human resources, while not producing the results and audience coverage that could be achieved by other stakeholders better positioned to conduct this work.⁷⁸

The Strategy and 2018-20 NAP were adopted in May 2018, after almost half of their first year of implementation had passed. The 2021-22 NAP was adopted only in November 2021, and then expired by June 2022, which left very little time for the implementation of the planned activities. Over half of planned activities had not been implemented within the planned timeframe, including activities that were not implemented at all and those that were delayed. The implementation schedules were significantly affected by the ongoing institutional reforms, the changes of and within the GoRM, the COVID-19 pandemic, and the multiple crises resulting from Russia's full-scale invasion of Ukraine in early 2022.

Most of the activities in the NAP were **not allocated specific funding** and are expected to be implemented within the existing resources of the responsible agencies or through external sources. With a few exceptions, where activities involved development partners, relevant financial and human resource inputs were provided. It was not possible to assess based on the available information on whether the financial and human resource contributions provided by responsible agencies were commensurate to the identified issues (needs, gaps) and/or requirements of the planned activities. There is no transparency and accountability in the way the resources are allocated to the Strategy/NAP implementation, and neither the NCCTHB nor the Directorate for Coordination in the Field of Human Rights and Social Dialogue oversee/ monitor this aspect of the Strategy/NAP implementation. Cost efficiency analysis is not conducted to establish the return on investment for direct assistance programs.

⁷⁸ Interview with CCTiP

“We can write many strategies, but if don’t have staff and funding, it all doesn’t matter. We need better working conditions, equipment [...] to attract better staff. Experienced staff means better organizational memory, better skills, better results. It is all interconnected. Otherwise, we can write, we can promise, but it does not change anything.”

“State budgets did not allocate specific funding for counter-trafficking, information campaigns, information bulletins – all of that is done with donor support. [...] We have crisis centres that provide crisis interventions for men and women, but long-term assistance programs are the responsibility of local structures that have no money. And the victims are suffering.”

“We lack resources for simple things, like when a victim or witness need to come for an interview and have no money to pay for travel or meals. These are not critical aspects for the investigation, but victims need to feel like they are taken care of. [...] Sometimes, police officers give money to victims to cover their expenses from their own pocket. When we draft strategies, we think of large things, but these little details remain forgotten.”

(From interviews with the Strategy/NAP stakeholders)

The implementation of the NAPs is monitored by the Directorate for Coordination in the Field of Human Rights and Social Dialogue biannually through the collection of inputs from all responsible agencies and development partners. Some of the interviewed stakeholders admitted that indirectly the exercise had served as a prompt for them to take steps towards implementing the planned activities, making progress towards targets (where they are established), or to identify how their regularly scheduled activities could have possibly contributed to preventing and combating THB. As discussed above, data provided by stakeholders for reporting purposes has not always been aligned with the listed activities and indicators, although the situation somewhat improved for the 2021-22 NAP. The Directorate for Coordination in the Field of Human Rights and Social Dialogue noted that key stakeholders had been slow in responding to data collection requests, particularly in 2022, and the semi-annual report for that year was not yet available at the time of the evaluation. As also noted above, the overwhelming number of policy documents that state agencies have to implement and report on also contributes to the delays and decreased quality.

The Strategy notes that international observers had previously criticized the GoRM for the lack of reliable information on THB, and the improvement of data quality and availability, particularly the creation and/or enhancement of data collection and analysis instruments and modalities, were listed among the expected results of the Strategy/NAPs. However, at the date of writing, most of the activities planned in this sub-area remained unimplemented (see more on this above). Furthermore, **data collection, monitoring and evaluation are not specifically budgeted for**, even though assessing progress towards some of the expected outcomes would require costly research/assessments to be undertaken (e.g. population surveys to assess awareness, media monitoring, etc). The Directorate for Coordination in the Field of Human Rights and Social Dialogue continuously lacked institutional capacities, expertise, technical instruments, and human resources to ensure more in-depth monitoring of the Strategy/NAP implementation beyond the basic collection and compilation of inputs from responsible agencies.⁷⁹ The actions aimed at transferring these functions to a specialised national rapporteur (foreseen in the 2021-22 NAP) were not implemented.

3.5 Impact

Interventions in the CT sphere have reportedly served as a “locomotive” for progress in certain areas of law enforcement and social assistance in the Republic of Moldova in the past. For example, the NRS

⁷⁹ See Antonova (2020)

created for victims and potential victims of THB was a pioneering model that introduced multidisciplinary approach to the protection and assistance of persons with multiple vulnerabilities and/or suffering from complex negative social phenomena. The model was then used as the basis for the establishment at the legislative level of a comprehensive NRMV covering victims of all crime. Other examples include conducting financial investigations and hearing vulnerable victims/witnesses under special conditions, which are practices that were originally introduced through CT programming.⁸⁰ Other examples brought up by interviewed stakeholders included financial investigations and asset recovery, as well as hearing victims/witnesses under protected conditions. At the time of the evaluation, another such impact was expected to emerge from setting up an information exchange mechanism between specialised law enforcement and the border police on THB victims/witnesses and suspects crossing the border. The relevant normative framework was being reviewed by the Ministry of Justice, but the GPO expected that eventually the system would cover participants of criminal proceedings on all types of crime.⁸¹

The Strategy anticipated to have **three core impacts**⁸² (described in its Chapter IV as “socio-economic impacts”) in the main areas of counter-trafficking: protection, prevention, and prosecution. In the context of limited data at the outcome level, assessing the extent of impact is even more difficult, albeit some conclusions can be drawn from the available information.

In the area of **Protection**, the Strategy’s intention was to promote socio-economic rehabilitation and reintegration of victims through developing viable mechanisms for quality assistance and protection and to establish favorable conditions for harmonious growth and development of victims of child trafficking.

Residential programs for adult victims and potential continued their operation through state and external support, and a new program for male victims was created in Chisinau, which ensured that victims had access to assistance and protection. It should be noted that these programs also provide assistance as daycare centres; however, an overwhelming majority of their clients receive assistance on a residential basis. Insufficient state funding of the centres for protection and assistance and limited availability/accessibility and/or quality of certain services that can be received through state service providers free of charge meant that maintaining high quality required continued reliance on external sources of financial support.⁸³ The Strategy implementation did not have any notable impact on this aspect of the centres’ operation, which means that the viability of the existing mechanisms for quality assistance and protection of victims remains an outstanding issue.

⁸⁰ Interviews with PCCOCS, specialised prosecutor’s unit of the GPO

⁸¹ Interview with the specialised section of the GPO.

⁸² This section does not discuss the more detailed expected impacts attached to each of the 15 goals of the Strategy, as most of them are formulated as outcomes, or even outputs, which are already largely covered earlier in the report. Specifically: “National policy on preventing and combating THB effectively coordinated and implemented by state institutions in partnership with NGOs and IOs” is an outcome-level result; “Specialists have professional capabilities to effectively promote the policy on preventing and combating THB” is an output-level result; “Available and accessible statistical information and data relevant to THB in the process of promoting the policy on preventing and combating THB” is an output-level result; “Mechanisms for planning and managing the state budget resources appropriated for actions in the area concerned strengthened” is an outcome-level result; “People’s response to forms of THB and related crimes” is an indicator; “The population informed about the danger of THB, provided with reference information materials on the protection available, and has access to assistance and protection programs” is an output-level result; “Private economic operators discouraged from creating conditions that generate THB and exploitation” is an output-level result; “Systemic mechanism of cooperation in identifying, referring and assisting victims and presumed victims of THB developed and applied on the basis of crime victims rehabilitation system” is both an output (mechanisms developed) and outcome (mechanisms applied); “The repatriation procedures of adults and children performed safely” is an outcome-level result; “All identified victims and presumed victims of THB provided with access to quality services” is an output-level result; etc.

⁸³ Interviews with CAP, Service for Male Victims of THB; also see Fomina, Bulat, Moraru-Cilimar (2022)

“We are lagging behind in health services. You need to confirm [victim] status with CCTiP, or police inspectors, or prosecutors [...]. We also have to show the law to medical service providers. [...] For anything that is beyond primary healthcare, we have to ask IOM for funding. [...] For employment support, we still need the victim certificate to prove status otherwise they [the victims] are considered ‘non-vulnerable’. [...] Employers can get compensation for employing victims of trafficking, but you need the certificate, and people don’t always want to be stigmatized. With men, it is particularly hard.”

(From interviews with the Strategy/NAP stakeholders)

No consolidated data on the status of **socio-economic rehabilitation** of victims/potential victims graduating from these programs are available;⁸⁴ however, service providers offered the following estimates on request of the evaluator:

Table 14. Socio-economic outcomes of assistance programs for victims of THB

CAP	Service for male victims and potential victims of THB (in operation since late 2021)	IOM
Upon leaving the Centre: <ul style="list-style-type: none"> - 50% of beneficiaries are employed (most popular professions include hair stylist, manicurist, and food industry workers), enrolled in training/education; or return to work abroad - 30% reintegrate into their families - 10% take maternity leave - 10% unknown (lost contact) 	Upon leaving the Centre: <ul style="list-style-type: none"> - 43% employed (incomes 6,500-7,500 lei, which is equiv. of \$325-\$375) - 8.6% started own business - 8.7% returned to work abroad - 52% reintegrated into their families - 13% repatriated to their countries of origin 	Statistics available through one of IOM’s projects (2019-22): <ul style="list-style-type: none"> - 82.6% of victims who received reintegration assistance were successfully employed or enrolled in the education system after 3 months upon completion of their individual reintegration plans - 93% of victims who benefited from vocational training and 100% of those who received entrepreneurship training + grants were employed after 3 months upon receiving assistance.

It is clear from these estimates that better resourced rehabilitation and reintegration programs have better immediate socio-economic outcomes. As discussed above, fear of stigma, low level of education and skills, and other factors such as gaps in the normative framework and the weakening of the referral system at the local level (see more on this below), have prevented victims and potential victims of THB from registering as unemployed and participating in livelihoods promoting programs offered by the state. However, where such programs are integrated into the individualized, needs-based assistance package offered by specialised service providers, with funding allocated towards them, they tend to bring better results.

It is important to note that only between a fifth and a third of all victims identified in Moldova turn to residential programs for assistance. This can be considered natural for a country of origin where trafficked persons may generally prefer to go home rather than stay at a shelter. Furthermore, law enforcement authorities, who are the primary source of identification of the overwhelming majority of victims of THB in Moldova, reportedly refer only the most vulnerable cases to such programs.⁸⁵ This means that the profile and needs of victims as understood by the residential programs can be drastically different from the overall picture, as can the outcomes of their rehabilitation and reintegration, leaving out some 70-80% of victims who do not require residential assistance or are not sufficiently

⁸⁴ Interview with ANAS

⁸⁵ United States Trafficking in Persons Report (2022)

informed/motivated to avail themselves of it. Considering that law enforcement authorities do not collect and compile information on socio-economic needs and outcomes for the victims they interact with, the available data cannot be considered representative even for the known victims of THB in Moldova.

“We need explanatory notes, [...] there is no clarity on these issues – it very much depends on the condition of each victim. We had a case of a person who had everything materially, but she was vulnerable. Another person was less well-off, but she was not vulnerable. Criteria are hard to establish. It is different from case to case.”

(From interviews with the Strategy/NAP stakeholders)

At the same time, **non-residential assistance and protection**, which relies on the proactive efforts of local MDTs, declined over the course of the Strategy/NAP implementation. Some of the factors contributing to that included significant staff turnover in the local service providers, lack of state funding combined with decreasing interest from international donors, loss of connections (with beneficiaries, among MDT members, between local MDTs and the National Coordination Unit) resulting from the isolation measures put in place during the COVID-19 pandemic, and others. As a result, the number of referrals to MDTs and assisted cases decreased.

“The role of MDTs at the local level is more apparent now. But because of the lack of funding, the consolidation of these teams was postponed from year to year.[...] When there were funds and people dedicated consistently, we maintained contact not from case to case but regularly. But because of the lack of resources, this part [of our work] has suffered.”

(From interviews with the Strategy/NAP stakeholders)

Many interventions intended to revitalise and enhance the work of the MDTs had been postponed throughout the Strategy/NAPs implementation in the anticipation of the adoption of the new normative framework on NRMV and of the respective revision of relevant guidelines, training programs, etc. As of the date of writing, these interventions remained pending despite the adoption in late 2021 of a specific program aimed at the development of the NRMV.

Long-term rehabilitation and reintegration assistance programs remained a gap on expiration of the Strategy. Service providers noted the lack of social housing as a particularly acute issue, as many graduates of the residential programs often had nowhere to go upon completion of their stay at the centre for protection and assistance, which left them vulnerable to repeated abuse, exploitation, and trafficking. Lack of post-rehabilitation monitoring of beneficiaries graduating from residential and non-residential assistance programs is another significant gap, particularly in the context where increasing percentage of assisted victims of THB have multiple vulnerabilities and come from disadvantaged backgrounds. It also means lack of data and feedback on the effectiveness and impact of the current protection and assistance programs for their final beneficiaries.

“We have centres but we don’t know what happens to the person in long-term. What happens to people when they go home?”

“Salaries do not cover rent. Victims cannot support themselves, especially if they have children. [This leads to an] increased risk of re-trafficking, sometimes they do it willingly. We had cases where girls were sexually exploited outside the country and then returned to the traffickers who pay them, even if it is only little.”

(From interviews with the Strategy/NAP stakeholders)

Likewise, the Strategy/NAPs had no significant impact on the treatment of THB cases where Moldova served as a country of destination. Few foreign victims continued to be identified and assisted in the course of the Strategy/NAP implementation, and their access to identification, assistance, and options other than eventual repatriation remained limited.⁸⁶

Case study: Ukrainian victim of THB exploited in Burundi resettled to Moldova

N., a national of Ukraine, was trafficked and exploited for forced labour in Burundi but was able to escape in 2022. She gave birth to a child while abroad. Due to the ongoing war in Ukraine, her return there was not considered safe, and the international organisation facilitating her repatriation from Burundi reached out to the Moldovan authorities with a request to resettle N. to Moldova. All relevant approvals were quickly secured through MLSP/ANAS, and accommodation, along with rehabilitation services, ensured for N. and her child at the CAP. At the time of the evaluation, N. was still residing at the CAP and working with the Centre's specialists on her plans of finding employment and integrating in Moldova.

The case, *inter alia*, demonstrates the high level of flexibility, openness, and efficiency of Moldova's current system of protection and assistance for victims of THB, a result of many years of investment in this area.

The NAPs did not include any activities seeking to improve the outcomes of services for **child** victims despite anticipating to have an impact in this sphere.

In the area of **Prevention**, the Strategy sought to mitigate the threats and consequences of THB for persons at risk, particularly women and children, by strengthening the efforts of specialists of competent institutions, development partners, and civil society.

The inclusion of THB-specific awareness raising efforts were stressed by many interviewed stakeholders as one of the unique features of the CT Strategy and NAPs, which are missing from other adjacent policy areas. The Strategy/NAPs were implemented in the context where the general population already had a relatively high level of awareness of THB, less so of its newly-emerging trends and forms.⁸⁷ Several interventions to inform the public were implemented as part of the NAPs, including national CT campaigns, activities targeting specific audiences, implementation of school curricula, etc and most covered rather large audiences. The impact of awareness raising efforts, however, has not been systematically assessed by Strategy/NAP implementers, so it is not possible to conclude whether the situation has changed (the latest available comprehensive survey covering awareness of THB is from 2019).

"It is very important for us, the Anti-Trafficking Week. That is when we are all consolidated. I write letters to all of our institutions, [...] to remind them that they need to pay attention to this topic and organize events. And I tell them to send me reports, [...] We cannot verify if things are being done, but I always count how many people were reached."

(From interviews with the Strategy/NAP stakeholders)

Interviewed service providers mostly deal with victims who come from backgrounds and contexts where mere awareness raising is unlikely to be effective for the prevention of THB. To prevent the trafficking of such individuals, strengthened comprehensive social protection of the most vulnerable at the community level is required. In that sense, vulnerability reduction programs should be further strengthened, which goes beyond of the limited scope of a CT policy document and requires coordination and synergy with other relevant strategies/programs.

⁸⁶ See also Fomina, Bulat, Moraru-Cilimar (2022)

⁸⁷ See IOM (2017), IOM (2019)

“There is lots of information about legal work abroad, how to sign a contract etc, through the Ministry of Labour and Social Protection or official websites and agencies, but you need to be smart. [...] The level of school/professional education of our beneficiaries is much lower than it used to be. Now, we sometimes deal with people who are illiterate. These people are easier to recruit and exploit in exchange for the most basic items. [...] If you try to explain to them what trafficking is, I am not sure how that can be done at their level.”

(From interviews with the Strategy/NAP stakeholders)

Progress achieved in promoting safe employment abroad, regulating intermediation services, and bilateral accords on social protection, along with closer ties with the EU, is likely to lead to the continued trend towards the increased uptake of legal employment abroad, as well as improved protection of migrant workers’ rights. Unlicensed intermediaries are already reportedly being outcompeted and pushed out of the market by private employment agencies that make efforts to comply with the government regulations.⁸⁸ However, according to service providers, its impact on the groups most vulnerable to THB, considering their current profile, is likely to be limited, as many such persons lack the necessary education/ skills to take advantage of the available programs and resources or be attractive clients for reputable employment intermediaries. The increase in domestic trafficking for forced labour also requires greater state controls over sectors susceptible to exploitation, an area where the Strategy/NAPs do not appear to have produced significant impact as, *inter alia*, the engagement of the State Labour Inspection remained limited.

For children, the impact of THB prevention efforts implemented specifically as part of the Strategy/NAP cannot be conclusively established due to the lack of data on the changes in knowledge/attitudes resulting from the implementation of the relevant school curricula, efforts to equip children with skills and tools to protect themselves from exploitation and abuse, particularly online, or training/re-training of educators. Interviewed child protection and education authorities suggested that the child protection system worked well (regardless of the existence of CT Strategy/NAP) and managed to capture at-risk children before they ended up trafficked. The data available from law enforcement on the number of child victims and that from education practitioners are collected for different periods (calendar year vs. school year) and do not correlate. It is difficult to conclude from the way the statistics of the Ministry of Education and Research⁸⁹ are presented on the percentage of the cases of presumed THB where allegations were not confirmed, exploitation was prevented, investigation opened, or victims referred for assistance. Furthermore, Ministry of Education and Research statistics suggests the prevalence of cases of labour exploitation, while law enforcement authorities have identified more cases of sexual exploitation of children. This may be an indication of a need for more (re)training of educators on the detection and prevention of child sexual exploitation, constantly adjusted to highlight the evolving recruitment methods and victim profiles.

At the same time, anecdotal evidence from interviews with service providers suggests that continuous strengthening of the efforts of specialists of competent institutions have had an impact with regard to trafficking prevention. Two examples offered by the interviewed stakeholders are the decrease in the percentage of children brought up in state boarding schools or family-type orphanages among victims of THB and improved prevention of THB by the border police. In both cases, significant investment has been made into putting in place relevant guidelines, establishing cooperation mechanisms, and building capacity of frontline staff, both within and outside of the CT Strategy/NAP.

⁸⁸ Interview with the National Employment Agency

⁸⁹ Available on the Ministry’s website: <https://mecc.gov.md/ro/content/prevenirea-si-combaterea-violentei>

Case study: prevention of trafficking of a Moldovan victim

N., age 19, is an orphan and was raised by her grandmother in a rural area. She became a mother in her mid-teens and was also at some point a client of a domestic violence shelter. N. was recruited online by a Romanian man who invited her to work for him and paid for her documents and trip. When N. discussed that with her social worker from the shelter, who she continued to keep in touch with, she was alerted to some red flags but still decided to go, as she perceived that there were no prospects for her in Moldova. The social worker alerted the border police and CCTiP, and N. was closely interviewed at border crossing and consequently returned by the border police to Chisinau. She was placed at the CAP and was at the time of this evaluation cooperating with CCTiP on the criminal investigation against her traffickers.

The case illustrates how awareness raising, capacity building, and networking efforts for frontline practitioners promote the effective prevention of THB

In the area of **Prosecution**, the Strategy anticipated that the investigation, criminal prosecution, and punishment of persons who have committed THB would help restore the rights of victims of THB and compensate for moral and material damages by ensuring social equity.

Interviewed stakeholders commented on the improved legal process on THB, which, however, is continuously impacted by the constant changes in the profile of the crime (prevalence of labour exploitation, of non-violence forms of coercion such as abuse of the position of vulnerability, etc). This makes prosecution increasingly nuanced and complex, and the relevant legislation, guidelines, and training often lagging behind.⁹⁰ While the number of persons prosecuted and sentenced for THB had not increased throughout the term of the Strategy, it remained generally higher than in the preceding years, including the number of persons who were sentenced to imprisonment. Several cases involving newly-criminalised forms of exploitation (trafficking for the appropriation of aid, allowances, or social benefits; using the result of work or services of a person who is a victim of THB) were prosecuted in the course of the Strategy implementation. The increased allocation of resources to PCCOCS and the consistent commitment to CT efforts shown by the GPO led to some improvements in the overall law enforcement response and the protection of victims' rights in the criminal process.⁹¹ The enhancement of international law enforcement cooperation on THB resulted in the identification and rescue of considerable numbers of victims and progress with the extradition of non-Moldovan suspects, the latter being a significant change from the past practice, according to the interviewed stakeholders.⁹²

“It [implementing the Strategy] helped us standardize our approach, implement best practices that were not at the same level, or applied only at the central level. [...] The consistency of testimonies has improved, there are no accusation of pressure on the victim or falsifying testimony thanks to video interviewing. Interviewing children with the use of special rooms – before, that was rarely done. These are the mechanisms and instruments that we have adopted from the Strategy [implementation].”

“Counter-trafficking is pioneering for the entire law enforcement system. Law enforcement agencies have become more pro-human rights, better understand victims' profile, better cooperate with the social services. Those are achievements of the prosecutors who have enhanced their monitoring.”

“What we saw before, despite the international nature of trafficking, prosecutors rarely asked for mutual legal assistance. Prosecutors were ‘locked’ inside Moldova. The [implementation of the] Strategy taught them to work with Interpol, Europol, Eurojust, SELEC, and showed them through joint investigation teams [...] that law enforcement officers in other countries work similarly, they are people who also have lots of cases and try hard to respond. [...] They no longer see international law enforcement cooperation as something outlandish. [...]”

(From interviews with the Strategy/NAP stakeholders)

⁹⁰ Interviews with representatives of the GPO CCTiP

⁹¹ Interviews with CCTiP, PCCOCS, IOM

⁹² Interview with CCTiP.

The most notable progress was made with arrest and confiscation of property acquired from or used to commit crimes related to THB. However, the increased proceeds are yet to result in increased funding for CT work, and the compensation mechanism for victims of crime remained inactive on expiration of the Strategy.⁹³

“In 80 per cent of cases we now do psychological expertise of victims. [...] And judges look more attentively at its conclusions, if the victim changes testimony, or does not remember certain things... [...] Parallel financial investigations are done in 70% of cases together with anti-money laundering agency. In 2017-18, that happened only in some cases, if the prosecutor was interested. [...] Now, if we get a trafficking suspect who cannot prove the source of income, there is a 90 per cent chance they will lose their property.”

“When we read the Law, there are mechanisms, but people are not requesting compensation, so there have to be issues. [...] When we talk to lawyers, they tell us the criteria are too complicated. The procedure for applications needs to be amended.”

(From interviews with the Strategy/NAP stakeholders)

Similarly, while the national reports highlight the increasing numbers and amounts of civil claims filed by victims of THB, GPO data suggests that the ratio of amounts claimed to total claims satisfied has had a decreasing trend (from ca. 40% in 2018, to 25% in 2019, 14.5% in 2020, 8% in 2021, and 4% in the six months of 2022). This can have a number of causes, including poor quality of claims, slowing down of claims’ review by courts, lack of understanding of the impacts of THB among judicial authorities, and others, which require a separate analysis.

The specialisation of judges piloted in 2018, approved by the Supreme Court of Magistrates in 2019, and extended for 5 years in 2020 was among some of the most important impacts of the Strategy implementation, welcomed⁹⁴ by GRETA. Unfortunately, it was reversed by the Supreme Court of Magistrates in 2022 for unclear reasons and will require renewed advocacy efforts from the CT stakeholders to be reinstated.

The Strategy did not include a separate overall impact statement in the area of **Partnership**. At the same time, interviewed stakeholders stressed this as the most important aspect of the document, referring to it as the key mobilizing and consolidating instrument, a mechanism for ensuring transparency, as well as the platform for joint initiatives with development partners and international donors. Implementation of the Strategy/NAPs also led to the establishment of a number of new partnerships among state and non-state entities within Moldova as well as with counterparts in countries of destination. At the same time, the Strategy had no impact on the coordination of CT policy in Moldova, and the previous gains in this area were lost over the course of its implementation.

⁹³ Interview with the MoJ

⁹⁴ GRETA(2020), p.33

“There are lots of joint activities, we come together to talk about operational issues. We have cooperation [with other law enforcement authorities] and exchange of information that was not there before. We have joint results.”

“We know each other better, we always meet in an extended format, we have a professional network. We have coordinating authorities. We understand that we cannot function without each other and reach a result. We support each other and work together.”

“We had improvement of cooperation between the CCTiP, social authorities, and the labour inspection. We also identified a role for the labour inspectors and private labour mediators. These actors, they now better direct their activity.”

“We got better cooperation with the CCTiP [...] and get more referrals from the police.”

(From interviews with the Strategy/NAP stakeholders)

The impact of the Strategy on **cross-cutting issues** such as gender equality, disability inclusion, and minority rights cannot be conclusively assessed due to the lack of the relevant indicators and data. Basic observations suggested that female victims of THB constituted the majority of those accessing assistance throughout the entire period of Strategy/NAP implementation, despite the growing prevalence of men among identified victims. This can be explained by the greater vulnerability of female victims (the Strategy referred to the feminisation of poverty in Moldova), disparities in the availability of assistance programs for men and women, gender stereotypes preventing men from seeking help or frontline actors from proactively informing and referring male victims to protection and assistance, and other factors. The gender composition of the staff of core agencies responsible for CT activities, with women dominating in the social sector and men in the law enforcement sector, further reflects the lack of gender mainstreaming in CT efforts. No consolidated data on the access of persons with disabilities and ethnic minorities to THB-specific prevention and protection services could be found in available sources.

The Strategy’s potential for direct impact was significantly affected by multiple **external factors**, including:

- ongoing administrative reform, particularly its aspects that have destabilized the policy coordination structures;⁹⁵
- competing priorities of responsible authorities (particularly in the context of the COVID-19 pandemic, multiple crises resulting from the Russian full-scale invasion of Ukraine, emerging tasks related to the recently approved EU Membership candidacy of Moldova, the need to revise/recreate multiple policy documents as a result of the Government Decision No.386/2020 etc.) that decreased the availability of resources for the implementation of the Strategy/NAP;
- brain drain and high staff turnover in the key responsible authorities;
- budgetary decentralization;
- movement restriction and social distancing measure put in place in the context of the COVID-19 pandemic, particularly in March-June 2020.⁹⁶

No evidence of indirect positive/ negative impacts (environmental, social, cultural, gender, or economic) or unplanned impacts on non-targeted communities could be identified by the evaluation.

⁹⁵ See Antonova (2020)

⁹⁶ For instance, see US Department of State Trafficking in Persons Report (2020).

3.6 Sustainability

Combating THB is likely to remain a priority for Moldova, particularly in the context of the EU Membership candidacy, as well as the close international scrutiny, increased with the spreading concerns over the heightened risks due to the grave economic impacts of the ongoing war in Ukraine the crisis with refugees/TCNs.⁹⁷ It is also part of the National Development Strategy “Moldova 2030”, as well as a priority included in support plans for the Republic of Moldova of the major international donors.⁹⁸ In this context, the attention of the national authorities to the issue is likely to extend beyond the Strategy’s current timeframe and help sustain some of the important outcomes, particularly in the area of prosecution (e.g. the now mandatory financial investigation and asset recovery guidelines and practices, monitoring of court cases, use of special hearing procedures for vulnerable victims/witnesses etc.).

Poor harmonization of normative framework and the lack of mainstreaming of THB across adjacent legal acts (e.g. on employment, social assistance, healthcare etc) is likely to affect future implementation of the newly adopted amendments seeking to extend certain types of assistance to victims and potential victims of THB.⁹⁹

High staff turnover in key governmental agencies (CCTiP, PCCOCS, local councils, social services, etc), which results from low wages, excessive workloads, and, as of 2022, security concerns, is the main threat to sustainability of the institutional response, as it constantly affects capacities, institutional memory, and partnerships. Brain drain and growing competition for qualified labour force in the context of the influx of international aid and humanitarian agencies in 2022 have made it more difficult for the state to recruit and retain staff. At the time of the evaluation, the Department for Gender Equality which fulfilled the functions of the National Coordination Unit had only one staff left; prior to that, the Department had three staff responsible for the implementation of four different national policy documents. The CCTiP had 34 out of 40 staff positions filled, which was considered a relatively good situation compared to some police units that had only 50% of their staff positions filled.¹⁰⁰

“There is a high staff turnover in social sphere [...]. They are always in need of training, in-person meetings, multidisciplinary trainings with police, prosecutors, education, health, etc.”

“The most sensitive issue is staff turnover. Financial capacities of state agencies are very limited vis-a-vis the workloads. Staff are limited in what they can do because they don’t have resources. Salaries need to be increased, otherwise the lack of motivation will make all efforts in vain. [...] People are hard to replace.”

“We don’t know how to keep people. In February-April, up to one hundred staff resigned each week due to security concerns, [...] and too much work. [...] We cannot hire people without experience. Not everyone is ready to work with this kind of participants of criminal process, cases that take so long to monitor and follow up.”

(From interviews with the Strategy/NAP stakeholders)

⁹⁷ As a joint initiative of the Parliamentary Committee on Social Protection, Health and Family and the Office of the OSCE Special Representative and Co-ordinator for Combating THB, a parliamentary hearing on THB was organised in the Republic of Moldova for the first time in June 2022, particularly in connection with the crisis with refugees/TCNs from Ukraine. More information: <https://multimedia.parlament.md/combaterea-traficului-de-fiinte-umane-discutata-in-cadrul-audierilor-publice-organizate-la-parlament/>

⁹⁸ See, *inter alia*, European Commission’s Multiannual Indicative Programme 2021-2027 for the Republic of Moldova; United Nations Sustainable Development Cooperation Framework for the Republic of Moldova 2023-2027; Council of Europe Action Plan for the Republic of Moldova 2021-2024

⁹⁹ See Fomina, Bulat, and Moraru-Cilimar (2022)

¹⁰⁰ Interview with CCTiP

Training of specialists, and particularly multidisciplinary trainings, remains the **least sustainable** of the Strategy/NAPs' achievements. This is due to the staff turnover discussed above, high cost of specialised and innovative training, and insufficient institutionalisation of advanced training on CT. The attempts to resolve the problem through making e-learning available to incoming staff with THB-related responsibilities were not completed to render the expected results and require further work. The lack of institutionalised models/curricula for multidisciplinary training means that this form of capacity building, despite being considered among the most useful by the interviewed stakeholders,¹⁰¹ continues to fully rely on the external donor support. At the same time, opportunities to participate in interesting capacity building activities like trainings led by international experts or networking visits abroad were mentioned as an important aspect of attracting and retaining qualified personnel, so the two issues are closely interconnected.

The sustainability of a significant number of **other outputs** (e.g. awareness raising, dissemination of information on victims' rights and available services, implementation of non-mandatory guidelines, etc) are contingent on ongoing prioritization of CT work and on systematic effort by the responsible authorities. If these activities are not continuously included into the relevant authorities' annual plans and budgets, the access of final beneficiaries to these outputs is likely to diminish or discontinue. The results of research/analysis exercises commissioned as part of the Strategy/NAPs implementation quickly become outdated in the highly fluid environment and, if unused immediately, lose their utility to end-users over time.

Access of victims of trafficking to services and justice are highly dependent on the proactive and sustained effort by the relevant actors, both state and non-state, to detect, identify, and continuously motivate these individuals to participate in assistance programs and prosecution of traffickers. If these efforts are not part of the ToR of the relevant staff, of agency-level strategies and organizational culture, the access of final beneficiaries to the relevant outputs will not be supported.

"It was good that the government did not cut funding for the shelters, being in such a vulnerable position [as it is now]."

(From interviews with the Strategy/NAP stakeholders)

MDTs, despite being an important and pioneering achievement, have proven to be an **unsustainable model** for Moldova so far, in need of constant financial and methodological support, as evidenced by their rapid decline once external mobilisation and funding ceased. Likewise, funding allocation for the residential assistance programs for victims and potential victims of THB has been largely insufficient to meet the needs of beneficiaries and had to be continuously supplemented from external sources. In the context of rampant inflation and if development/emergency funding decreases or becomes unavailable, the sustainability and scope of these programs is likely to be threatened.

"Donors need to be more active in this sphere and understand the capacities of the Government of Moldova, [...]. They should continue funding streams, because once they are blocked, the processes get disrupted. We have good legislation, but when we talk about services and additional responsibilities, we need support and cooperation."

(From interviews with the Strategy/NAP stakeholders)

¹⁰¹ Interviews with CCTiP, PCCOCS, ANAS, IOM, CAP

Achievements such as the inclusion of THB into regular and mandatory school curricula and the improved access to safe employment abroad, on the other hand, have a **strong potential to maintain their sustainability**, as they do not depend on donor funding.

Several **mutually balancing factors** are likely to influence the level of sustainability of the CT work in the mid-term perspective. On one hand, the economic impacts of Russia's invasion of Ukraine and the resulting energy and food crises trigger a chain reaction of inflation, rapidly growing prices, and increased burden on state and non-state services. On the other, Moldova's change towards a pro-European government and the newly-acquired candidacy for the EU membership have boosted the state's cooperation with the EU and opened up perspectives for increased international assistance, including in the CT area. Unprecedented humanitarian funding currently injected into Moldova's response to the crisis with refugees/TCNs has also created new opportunities for the government of enhance some of its capacities and practices, particularly in the areas associated with migration management and emergency response, both of which incorporate considerations for THB.

“Trafficking is a kind of issue that is not influenced by the change of politics. Everyone agrees that we need to fight trafficking, unlike corruption and other issues. I have been working on this for 20 years, I never felt that we were under threat.”

“The need to report keeps the focus on the issue.”

(From interviews with the Strategy/NAP stakeholders)

4. Conclusions

The Strategy represents a **significant improvement** over the previous policy documents in the CT sphere in the Republic of Moldova and represents an equally or more comprehensive and complex effort against THB than what is foreseen in similar policy documents in neighbouring countries and those of similar population sizes and economic situations.¹⁰² It captures the progress that had been achieved by the government vis-à-vis the international standards, particularly those established by the CoE Convention on Action against THB; reflects the conclusions and recommendations of the major international monitoring instruments in the CT sphere; and contributes to progress towards several Sustainable Development Goals. The Strategy and associated NAPs have served as a key mobilizing and consolidating instrument, a mechanism for ensuring transparency, as well as the platform for joint initiatives with development partners and international donors.

The key conclusions and lessons learned from the evaluation of the Strategy/NAPs' development and implementation by the six evaluation criteria are as follows:

- **RELEVANCE:** Stakeholders have appreciated the comprehensive nature of the Strategy, which ensures its long-term relevance, and the **4P approach**, incorporating considerations for the interconnected areas of protection, prevention, and prosecution of THB, with cross-cutting partnership building. At the same time, the Strategy covers an exceedingly broad scope of issues and appears to attempt to achieve too much within too little time, with very limited resources.

The approach to Strategy design was largely **inclusive and participatory**, and received an overwhelmingly positive assessment from the involved stakeholders. At the same time, it did not sufficiently incorporate the perspective of the final beneficiaries and stakeholders/ target groups from the local level. Important cross-cutting issues such as gender, minority rights, and disability inclusion were not sufficiently analysed and mainstreamed at the Strategy elaboration stage.

Although the Strategy has a generally strong **internal coherence**, the logical connections between its different levels (goals, expected outcomes and impact, outputs, and activities) could be strengthened. The greatest weakness of the Strategy is its **monitoring and evaluation framework**, particularly the predominant lack of indicators at the outcome, objective, and impact level, lack of systematic inclusion of baselines and targets, and poor adherence to the SMART criteria when formulating output indicators. The insufficient application of results-based approach in the Strategy's/NAPs' design, implementation, and monitoring means poor connection between stakeholders' efforts, expected and achieved results, and impact vis-à-vis identified needs/gaps.

- **COHERENCE:** The Strategy **strongly builds on the achievements of the previous efforts** on prevention and combating THB in the Republic of Moldova, directly contributes to three SDGs, and indirectly to three other SDGs, and supports the implementation of several major national policies, as well as key international recommendations in the CT sphere. At the same time, the Strategy/NAPs do not sufficiently consider policies in related areas concurrently implemented by

¹⁰² For instance, see the State Targeted Social Program on Countering Trafficking in Persons for the Period through 2020 adopted by the Cabinet of Ministers of Ukraine in 2016 (access: <https://zakon.rada.gov.ua/laws/show/111-2016-%D0%BF#Text>); the 2019-2020 National Action Plan for Combating Trafficking in Persons adopted by the Interagency Council for Combating Trafficking in Persons of Georgia in 2018 (access: <https://justice.gov.ge/files/Ymkq9KMczHyf.pdf>); the National Action Plan against Trafficking in Human Beings for 2020-2021 of Poland (access: <https://www.gov.pl/attachment/4746399e-6048-48e3-8233-5c71dcf6a5fc>); Strategy for Combating Trafficking in Human Beings 2019-2024 of Montenegro (access: <https://www.osce.org/files/f/documents/8/d/424622.pdf>)

the government and contain multiple overlaps with other strategies, programs, and action plans. Activities envisioned in the NAPs have been inconsistently reflected in the corresponding annual agency-level operational plans, an indication of the largely voluntary nature of the Strategy/NAP implementation. Strategy/NAP stakeholders do not appear to have made a concerted effort to mainstream preventing and combating THB in policy documents addressing issues adjacent to THB to reinforce the progress towards the desired change in this sphere.

- **EFFECTIVENESS:** The implementation of the NAPs produced a number of **important outputs across all areas and most of sub-areas of the Strategy**. These included, *inter alia*, amendments to legislation and development of supporting normative framework and guidelines; training of a variety of stakeholders; establishment of a specialized service for male victims and potential victims of THB; annual national CT campaigns to raise public awareness reaching a wide audience nation-wide; introduction and consistent implementation of mandatory curricula for schools, inclusive of THB and related issues; and steps to enhance interagency and international cooperation, particularly in the law enforcement area and safe employment. Formulation of the relevant targets at the Strategy design stage would have made these achievements more pronounced.

The limited evidence that is available from the national reports and other consulted sources also demonstrates that **progress has been made towards the majority of expected outcomes**. The most prominent outcomes include, *inter alia*, better alignment of the legislative framework with the international standards and newly-emerging THB threats; enhanced capacities of law enforcement authorities to combat THB; improved conditions for and access to safe employment abroad; development of new public social services; strengthened application of financial investigation, asset recovery, and confiscation practices in the prosecution of THB; and intensified international cooperation in the law enforcement, employment, and social protection spheres. At the same time, little or no progress was made towards some key outcomes, most of them related to victim identification and referral, primarily due to the slower than expected transition from the NRS to NRMV, as well as on improved mechanisms for financing of CT work and data collection & analysis.

The production of a significant number of outputs, and the attainment of respective outcomes, were gravely affected by multiple **negative external factors**, particularly the COVID-19 pandemic and the multiple crises arising from the Russian full-scale invasion of Ukraine, along with the ongoing administrative reforms and high staff turnover in key governmental agencies. The Strategy stakeholders adapted to the best of their abilities and were able to continue their work despite drastically reduced capacities, options, and available resources.

- **EFFICIENCY:** Even though the Strategy emphasised the need for effective coordination in the CT sphere, the NAPs did not include sufficient action to solidify the leadership and operational coordination functions, both at the national and local levels.

The Strategy/NAPs had **no designated budget**. Consequently, stakeholders implemented planned activities and achieved the intended outcomes inasmuch as they could do so without requesting additional funding from the state/local budget or with external funding. The lack of budget allocations for proper data collection and analysis has exacerbated the problems with proper monitoring and evaluation of the Strategy/NAPs. There is no transparency and accountability in the way the resources for the Strategy/NAP implementation are allocated and utilised, and neither the NCCTHB nor the Directorate for Coordination in the Field of Human Rights and Social Dialogue oversee/ monitor this aspect of the Strategy/NAP implementation.

The **timescale** of activities planned for 2018-20 appeared mostly in line with stakeholders' capacities, but the overwhelming number of activities clearly posed a challenge. The timeframe for the implementation of the 2021-22 NAP was not sufficient. Correspondingly, over 80% of activities planned for 2018-20 were implemented or partially implemented, while in 2021-22, this number is estimated (based on the available data) at only about a half of the planned activities.

- **IMPACT:** The evaluation considered the Strategy's overall effect vis-à-vis the three impact statements (referred to as "socio-economic impact") in the areas of protection, prevention, and prosecution. However, the scope of conclusions under this criterion is constrained by the low availability of relevant primary data and the limited applicability of regularly collected statistics (e.g. numbers of victims identified and assisted, number of cases prosecuted, verdicts issued, etc.), which reflect the trends and progress only to a certain degree, being influenced by a large variety of external factors.

Assessment of the Strategy/NAP's expected impact in the area of **protection** is complicated by the lack of consolidated and representative data on the results of rehabilitation and reintegration programs vis-à-vis the needs of the victims and potential victims of THB. Some positive impacts can be observed on the graduates of residential programs. The continued existence of such state-owned specialised protection and assistance programs for this category of beneficiaries in Moldova (and creation of new ones) is an achievement in itself in the context of extreme resource shortage. However, modest funding allocation, along with the limitations of the state-guaranteed free services, curtail the viability of these programs and make maintaining high quality of assistance continuously dependent on external sources. At the same time, the decline of local MDTs has meant that non-residential protection and assistance, particularly at the district and community level, has had little to no capability to produce the expected change in the well-being of the final beneficiaries. Long-term rehabilitation and reintegration and beneficiary monitoring in particular have remained a gap on expiration of the Strategy.

The impact of awareness raising efforts has not been systematically assessed by Strategy/NAP implementers or been subject of research/population surveys since 2019. Some positive impacts have been achieved in vulnerability reduction, particularly through the facilitation of safe and regular employment abroad. Yet, the most vulnerable among those at risk of THB are unlikely to benefit from these developments or from awareness raising interventions alone. Their situation requires a significant strengthening of the social protection systems at the local level, which largely goes beyond the scope of a CT policy. At the same time, qualitative evidence suggests that continuous investment in the strengthening of the capacities of specialists of competent institutions *have* had observable positive impact with regard to trafficking **prevention**.

In the area of **prosecution**, the numbers of prosecutions and prison sentences for THB were maintained at an on average higher level than in the preceding years, and there were prosecutions of some newly criminalised forms of THB. The consistent commitment to CT efforts shown by specialised law enforcement authorities has led to the improvement in the overall law enforcement response and the protection of victims' rights in the criminal process. The enhancement of international law enforcement cooperation on THB resulted in the identification and rescue of victims and progress with the extradition of non-Moldovan suspects. The notable progress with arrest and confiscation of property acquired from or used to commit crimes related is yet to result in increased funding for CT work, or appropriate compensation of victims.

Although the Strategy did not include expected "socio-economic" impact statement in the area of **partnership**, it was viewed as one the most important aspects of the document. At the same time, the Strategy had no impact on the coordination of CT policy in Moldova, and the previous gains in

this area were lost over the course of its implementation. The model predating the Strategy approval, where this role was assumed by a well-resourced Permanent Secretariat of the NCCTHB was considered optimal by stakeholders but contained fundamental inconsistencies with the overall direction of the government reform. The current situation can only be viewed as temporary, as the Directorate for Coordination in the Field of Human Rights and Social Dialogue has continuously lacked institutional capacities, expertise, technical instruments, and human resources to meet the requirements of the role of the *de facto* national CT coordinator and been awaiting further reform. The issue of appointing a national rapporteur remains unresolved.

Despite the clear achievements of the Strategy, most of the problems it identified in the CT sphere continue to be unresolved upon its expiry, either due to their systemic nature, insufficiency of the planned and implemented efforts, changed circumstances, or external factors.

- **SUSTAINABILITY:** Combating THB is likely to remain a priority for Moldova in view of a variety of factors, which should help sustain some of the important outcomes, particularly in the area of prosecution and international cooperation. At the same time, significant threats to sustainability persist, such as poor harmonisation of the normative framework across sectors, high staff turnover in key state agencies, lack of institutionalisation of certain guidelines and of training, awareness raising, and proactive outreach work, as well as the scarcity of financial resources along with negative external factors. Ensuring the mid- to long-term sustainability of most of the outputs and outcomes of the Strategy/NAPs will likely require a **continued existence of a distinct policy document in the CT sphere** to mobilize, motivate, and consolidate stakeholders' efforts and serve as a fundraising tool. The EU integration processes, together with the close scrutiny of the GoRM's THB response in the current difficult context, will help maintain an appropriate level of prioritisation of this issue within the next three to five years.

5. Recommendations

THB is a multifaceted phenomenon requiring the attention of a variety of state, non-governmental, and international actors jointly prioritising, directing, and coordinating their efforts as well as fundraising for them. In the current context of the Republic of Moldova, there is an evident continued **need for a distinct policy document** on THB to maintain the level of stakeholder engagement, sustain current achievements, guide capacity building and data collection efforts, and move forward with addressing the remaining issues. This need is reinforced by the significant emerging trends and risks, particularly those associated with the mass flows of refugees/TCNs from Ukraine, economic and energy crises increasing the vulnerability of population, and Moldova becoming a country of destination, along with the heightened international attention to THB. At the same time, the current resource constraints, overwhelming number of competing priorities, rapid changes in the international and national contexts, and missed budgetary planning timelines,¹⁰³ mean that it may not be possible to put in place another comprehensive, long-term policy document of a similar depth and scope as the Strategy at this stage.

Several **solutions** could be suggested, including:

1. **Option 1:** Extend the current Strategy through 2025, bringing it in line with the requirements of the Government Decision No.386/2020 as necessary, and develop a new NAP in support of its implementation. Since the majority of issues identified by the Strategy remained unresolved upon its expiration, and most of its goals and expected outcomes – largely relevant, the Strategy’s continued use as a guide for CT action is justified. The new NAP can be formulated in an updated format, drawing from the lessons learned outlined in this report, and focus on a smaller number of priorities identified by stakeholders for each of the sub-areas. References can be made to other concurrent policy documents which include overlapping interventions or where actions to achieve some of the stated expected outcomes may not be within present capacities of the Strategy implementers. This option could also save time and effort of stakeholders in that (1) they had already reached a consensus on the Strategy’s goals and outcomes; (2) they are well familiar with the document and understand their respective roles; (3) the development of a NAP will not require as much work as that of a more comprehensive policy document. These are important factors in the context where most of the key actors are overwhelmed and under-resourced.
2. **Option 2:** Using the current Strategy as a resource, develop a comprehensive, 4Ps-based program for the period of no more than five years, covering a small, concentrated number of issues and objectives under each area. If an extension (Option 1) is not possible, the Strategy could be reformulated into a program, establishing one priority goal per area and one specific objective and expected outcome per sub-area, using the overall structure of the current Strategy as a reference while eliminating the crossovers between sub-areas. The program should draw upon evidence-based situation analysis, lessons learned, and stakeholders’ real capacities, as well as duly consider the priorities and actions already covered in other concurrent policy documents to optimise resources and avoid duplication of effort.
3. **Option 3:** Develop a two- to three-year action plan in support of the next national policy document on human rights, focusing exclusively on THB-specific issues not covered in other concurrent policy documents. Choosing this option could help optimise the use of the resources of the Directorate for Coordination in the Field of Human Rights and Social Dialogue, respond to the general concern over the overwhelming number of strategies and programs, and allow stakeholders to focus on a small number of relatively short-term targets in a rapidly changing context, while maintaining partner engagement, transparency, interagency coordination, and fundraising focal point.

¹⁰³ According to interviewed stakeholders, the deadline for submitting funding estimates for the next mid-term budget planning exercise was in September 2022.

The following **priorities** should be considered for the upcoming policy period:

- **Leadership, operational coordination, and policy monitoring in the CT sphere.** This is the key issue for ensuring long-term sustainability of all gains made in the CT sphere in the Republic of Moldova and moving forward. Decisions must be made, based on the available analysis and stakeholders' views, on whether the current coordination structure should be preserved, with the allocation of greater resources to the Directorate for Coordination in the Field of Human Rights and Social Dialogue, or reformed, including the appointment of a national rapporteur.
- **Directing resources and building capacities at the local level,** where most victims and potential victims of THB reside, with a particular focus on strengthening horizontal and vertical policy formulation and coordination and effectively supporting local authorities in the implementation of action plans on CT as well as revitalisation of the MDTs, especially in the context of the new NRMV rollout.
- **Strengthening the prevention and prosecution response to THB involving online recruitment and exploitation.** GRETA has underlined the growing trend of trafficking in human beings occurring online and/or facilitated by new technologies,¹⁰⁴ which is of particular relevance in the context of people fleeing the war in Ukraine¹⁰⁵ and increased use of social media for victim recruitment in Moldova.
- **Developing systems and capacities to respond to THB into and via Moldova,** taking into account the crisis with refugees/TCNs from Ukraine, requirements for foreign labour force in the context of severe labour shortages and brain drain, and the EU membership agenda, along with the relevant international recommendations and best practices on these issues.

The following improvements could be made in the new policy **design**:

- **Drastically enhanced monitoring, evaluation, and data collection modalities.** SMART indicators should be established for all result levels (outputs, outcomes, and objectives), along with evidence-based baselines and realistic, time-bound targets. Appropriate data collection requirements should be established, and relevant activities planned, with required funding allocation. Corresponding indicators established in the National Development Strategy "Moldova 2030", EU-Moldova cooperation frameworks, and other core strategies, as well as those suggested in the *Guidelines for the Development and Implementation of a Comprehensive National Anti-Trafficking Response*¹⁰⁶ can be used as a resource for the formulation of CT policy indicators. Support of specialised non-governmental organisations and development partners could be sought to collect the necessary data for baselines, mid-term milestones, and targets. Stakeholders should also be encouraged to move from activity-based towards results-based reporting, and include qualitative information (analysis, case studies, etc.) of relevance to the policy's expected outcomes and impact to add depth and perspective to the numerical and factual data being reported.
- **Decreased scope of interventions,** which would increase the document's implementability, allow stakeholders to focus on a small number of priority areas, and ensure appropriate level of monitoring, evaluation, and follow up. This exercise should also involve the elimination of overlaps

¹⁰⁴ See https://www.coe.int/en/web/anti-human-trafficking/news/-/asset_publisher/fX6ZWufj34JY/content/new-report-on-online-and-technology-facilitated-trafficking-in-human-beings?inheritRedirect=false&redirect=https%3A%2F%2Fwww.coe.int%2Fen%2Fweb%2Fanti-human-trafficking%2Fnews%3Ep_p_id%3D101_INSTANCE_fX6ZWufj34JY%26p_p_lifecycle%3D0%26p_p_state%3Dnormal%26p_p_mode%3Dview%26p_p_col_id%3Dcolumn-4%26p_p_col_count%3D1

¹⁰⁵ <https://www.osce.org/cthb/516423>

¹⁰⁶ Access:

https://www.icmpd.org/file/download/52502/file/Guidelines%2520for%2520the%2520Development%2520and%2520Implementation%2520of%2520a%2520Comprehensive%2520National%2520Anti-Trafficking%2520Response_500%2520kb.pdf

among sub-areas of intervention and streamlining the action towards the achievement of expected outcomes and objectives. For example, efforts to amend legislation, build the capacities of institutions and practitioners, collect data, etc. could be included to achieve progress towards objectives established under each of the 4Ps rather than separate sub-areas.

- **Thorough analysis of other concurrent policy documents**, which incorporate actions contributing to the CT Strategy's objectives to identify opportunities for collaboration and resource optimisation, enabling actions, and potential overlaps. This is particularly important in the context of the adoption of new policy documents on NRMV, combating organised crime, migration & asylum, employment, and digitalisation. It is also important for the national CT coordinator and key stakeholders to advocate for the mainstreaming of CT efforts in other strategies, programs, and action plans, as well as in the relevant normative framework and guidelines, including on civil servants' ethics, anti-corruption, and public procurement.
- **Greater inclusivity and incorporation of cross-cutting issues**. This includes, *inter alia*, more effort to reflect the perspectives of the final beneficiaries and local-level stakeholders in the policy document along with inviting a broader scope of organisations of people with disabilities, Roma rights organisations, and other relevant actors to contribute to the policy document. Victims and potential victims of THB and their needs should be placed at the centre of the policy document. A gender audit can be solicited from a competent organisation or development partner to advise on the best ways to mainstream gender equality across all interventions, result statements, and monitoring & evaluation system.
- **Clearer mechanisms for policy revision and stakeholder accountability**. The increased number of unforeseen risks affecting policy implementation in the past three years suggests that policy documents need to be sufficiently flexible to adapt to the changing circumstances and requirements. Raising the effectiveness, efficiency, and sustainability of stakeholder action requires the system of leadership in the CT sphere to be built in a manner that supports accountability and moving away from formal approaches to implementation.

6. Annexes (attached separately)

Annex 1 – Documents reviewed

Annex 2 – Stakeholders interviewed in the course of the evaluation

Annex 3 – Mapping of the Strategy/NAPs and progress to date

Annex 4 – Agenda and list of participants of the validation roundtable

Annex 5 – Compilation of the objectives, outcomes, activities, targets, and indicators related to THB included in the ongoing, newly-approved, and forthcoming policy documents