US Department of Labor Office of Trade and Labor Affairs

Interim Evaluation of the Project Strengthening Government Labor Law Enforcement in Honduras (SGLLE)

**Evaluation Contractor:** Sistemas, Familia y Sociedad Ltd. (SFS)

Project Objective

The Project will strengthen administrative labor law enforcement through improved implementation of the Ley de Inspección del Trabajo (Labor Inspection Law, LIT).

The Long-Term Outcomes (LTO) of the project are: **LTO 1-** Government adoption and/or improved implementation of laws, regulations, and other legal instruments consistent with relevant labor standards; **LTO 2-** Improved government identification and remediation of labor law violations; and **LTO 3-** Improved prosecution of labor law violations.

The project is part of broader USDOL support to the government of Honduras for the implementation of the Labor Rights Monitoring and Action Plan (MAP), particularly regarding the improvement of the capacities of the ATI, within the STSS. ATI provides oversight for the actions of the Directorate General of Labor Inspection (DGIT), and the improvement of the capacities of the PGR for labor fine collection.

The SGLLE project is currently working in the *departamentos* of Cortés (San Pedro Sula) and Francisco Morazán (Distrito Central/ Tegucigalpa). The Project also aims to improve labor inspection oversight countrywide.
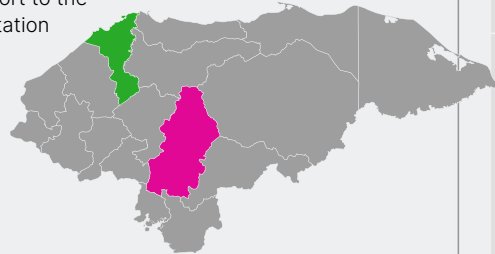
Project areas of intervention:

1. Cortés
2. Francisco Morazán

Period of Performance: January 2019 – March 2024

Funding: $2,428,944

Implementer: American Institutes for Research (AIR) - Formerly IMPAQ International LLC

Partner Institutions:

- ATI – Auditoría Técnica de Inspección (Technical Inspection Audit Unit)
- STSS – Secretaría de Trabajo y Seguridad Social (Secretariat of Labor and Social Security)
- PGR – Procuraduría General de la República (Attorney General of the Republic)
- DGIT - Dirección General de Inspección del Trabajo

Key Conclusions

Relevance & Validity

- The project is relevant to the Labor Rights Monitoring and Action Plan (MAP) programming, as it responds directly to the needs and challenges of applying Honduran labor law.

- The Project strategy adequately reflects the Honduran institutional architecture for labor law enforcement by improving STSS capacities for the identification and remediation of labor law violations, improving PGR capacities for labor fine collection, and strengthening the quality of labor inspection through the ATI.

Coherence

- The ongoing extension of the USDOL-funded Futuros Brillantes (FB) project implemented by World Vision (WV) in Honduras, created a scenario in which a crucial component of SGLLE is dependent on FB's intervention. This requires an effective collaboration between the two projects.

- SGLLE focused its strategy on minimizing the dependence upon FB completion of the electronic case management system (ECMS). Instead, the Project supports fluid IT communication to ensure adequate connection of PGR and ATI modules, with the ECMS, by tailoring modules to each institution's respective needs and technological platform.

Efficiency

- The project timeframe (ending in March 2024) is adequate for achieving SGLLE outcomes.

- By March 31, 2022, the project had spent around 29% of its total budget, but only two outputs have been delivered (the ATI baseline assessment and the ECMS assessment). This implies that the project will have to deliver the remaining substantive outputs with around 71% of its planned budget. That will require a very efficient use of funds.

Photo Credit: Fe y Alegría – Honduras

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"We are now seeing a change in the PGR, which is expressing in meetings their commitment to collecting labor fines."
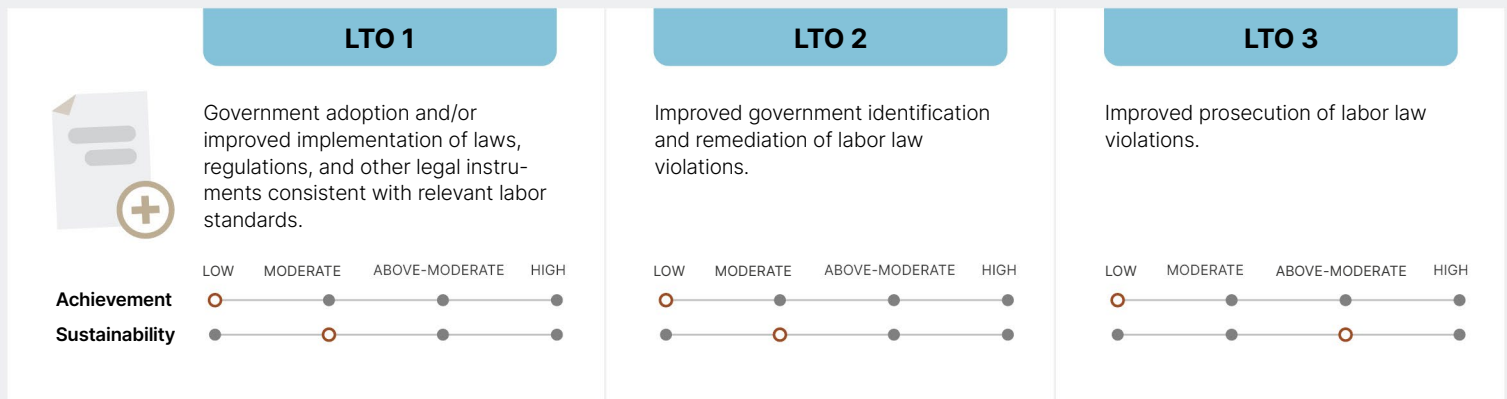
- CGT Representative

Effectiveness

- The Project's rate of implementation is slow and has limited the achievement of key deliverables, mainly caused by SGLLE's intervention relying upon the completion of components under the *Futuros Brillantes* project.

- **Regarding LTO 1**, the development of ATI procedures is in the initial phase of gathering the requirements for conducting audits.

- **Regarding LTO 2**, the project is starting to form ATI requirements, gathering information for the development of planning tools. The development of the ATI/ECMS module is in its initial stages, advancing in coordination with the World Vision-led *Futuros Brillantes* project.

- **Regarding LTO 3**, in coordination with *Futuros Brillantes* and the PGR, the Project is exploring the best technological design to connect the STSS/ECMS with the PGR systems.

Sustainability

- Regarding LTO 1, conditions for the legalization of ATI procedures by the STSS are favorable. The new STSS authorities are showing positive signs of ownership of ATI, although the actual commitment remains to materialize.

- Regarding LTO 2, the low capacity of STSS's IT department may pose a risk to the effectiveness and sustainability of this outcome.

- Regarding LTO 3, the PGR has adequate capacities for the development, uptake, and maintenance of the PGR module.

✔ Achievements and Sustainability

LTO 1

Government adoption and/or improved implementation of laws, regulations, and other legal instruments consistent with relevant labor standards.

	LOW	MODERATE	ABOVE-MODERATE	HIGH
Achievement	○	●	●	●
Sustainability	●	○	●	●

LTO 2

Improved government identification and remediation of labor law violations.

	LOW	MODERATE	ABOVE-MODERATE	HIGH
Achievement	○	●	●	●
Sustainability	●	○	●	●

LTO 3

Improved prosecution of labor law violations.

	LOW	MODERATE	ABOVE-MODERATE	HIGH
Achievement	○	●	●	●
Sustainability	●	●	○	●

RESPONSE TO COVID-19

- The lockdowns and travel restrictions resulting from the COVID-19 pandemic contributed to a significant slowdown of Project activities between 2020-2021.

- The Project shifted to virtual work modalities, which was challenging for national stakeholders due to low levels of computer literacy, a lack of telworking culture, and poor IT infrastructure (many STSS staff did not have teleconference equipment or high-speed internet connection).

"The ECMS is highly relevant to make labor inspection processes transparent to ATI... a tool that will increase the capacity of ATI's small team."**- DGIT Official**

Promising Practice

- The Project's approach to the legalization of labor law procedures provided a logical workflow for capacity building. Institutions were able to ascribe ATI procedures and subsequently develop planning tools for the technological platform needed for labor inspection audits.

- Developing flexible information technology (IT) solutions, tailored to recipients' institutional capacities maximized uptake and sustainability. For example, the development of an electronic case management system (ECMS) for ATI and a modular administrative management system (SIGMA) for PGR, facilitated labor law integration into each institution's respective technological platform. These tailored systems fostered ownership and reduced maintenance costs.

Lessons Learned

- For projects that are dependent on the outcomes of other ongoing programming, close communication and collaboration between concerned USDOL offices is required.

- Lengthy project (re)design processes should incorporate an analysis of the budgetary impacts and include corrective measures.

Recommendations

For AIR and/or Government of Honduras	USDOL	AIR	ATI, STSS, PGR
1 **Reinforce procedures within ATI regarding its preventive and quality control role.** SGLLE should provide detailed, step-by-step guidance on how to conduct preventive and quality control audits. Then, SGLLE ought to disseminate the results of the audits to DGIT and other relevant departments, that provide actionable recommendations for improvement.		✓ AIR	✓ ATI, STSS, PGR
2 **Expand the ATI staff training package.** SGLLE should equip the ATI with a stand-alone training package to provide new staff with the specific procedures for conducting effective audits and keep existing staff updated. This training package should be disseminated in a self-training format or any other modality that minimizes dependence on external trainers.		✓ AIR	✓ ATI, STSS, PGR
3 **Include a strategy to disseminate ATI's role and functions.** SGLLE should technically support ATI in implementing information campaigns about its role, targeting DGIT and other departments connected to the labor inspection process (e.g., the Conciliation department).		✓ AIR	✓ ATI, STSS, PGR
4 **Collaborate with local legal experts to develop ATI procedures.** SGLLE should bring onboard local legal experts for the legalization of ATI procedures. Their expertise would complement the inputs from the country director and the SGLLE legal experts.		✓ AIR	
5 **Formalize coordination with Futuros Brillantes (FB) project under the leadership of the STSS.** SGLLE should reinforce ongoing communication with FB and STSS through regular coordination. SGLLE should also conduct coordination meetings with the STSS IT department and FB on the development of the ATI and PGR modules. This collaboration would address any IT issue on the development and rollout of the ECMS that may have implications for the ATI and PGR modules.		✓ AIR	✓ ATI, STSS, PGR
6 **Improve outcome measurement in the M&E Framework.** In coordination with ATI, SGLLE should include quantitative indicators that measure the contribution of ATI's oversight to the Labor Inspectorate's improved compliance with inspection procedures and labor law within its M&E framework (e.g., indicators on reduction in complaints by labor inspection users, reduction in irregularities detected by ATI, and other as relevant). SGLLE should then analyze the results with an end line study measuring ATI effectiveness (e.g., use of the ECMS-linked module, improvement on the quality of audits, adherence of audits to the procedures, etc.) to identify priority areas pending improvement after the project's finalization.		✓ AIR	✓ ATI, STSS, PGR
7 **Improve STSS IT department's capacities for sustainability.** SGLLE should expand, in coordination with World Vision, the training and transference of activities for the STSS IT department. SGLLE should develop an IT capacity building package focusing on software development and maintenance, based on a detailed assessment of capacity gaps in the IT department, the maintenance of ECMS, ATI, and the PGR modules.		✓ AIR	✓ ATI, STSS, PGR

For USDOL, AIR and Government of Honduras	USDOL	AIR	ATI, STSS, PGR
8 **Strengthen strategic advocacy with national stakeholders.** SGLLE should make strategic use of its participation in the MAP tripartite monitoring committee to advocate for the STSS' commitment to support the improvement of ATI capacities and authority within STSS. SGLLE should expand its engagement with workers' organizations and advocate to include the three main national trade unions at the MAP tripartite monitoring committee. USDOL should continue mobilizing STSS and PGR to generate ownership of the project and to foster SGLLE participation in the MAP tripartite monitoring committee.	✓ USDOL	✓ AIR	✓ ATI, STSS, PGR

For USDOL	USDOL	AIR	ATI, STSS, PGR
9 **Include within USDOL funding opportunity announcements a mechanism to facilitate the project (re)design for interventions connected to ongoing or incomplete projects.** Such a mechanism would flexibly adjust the scope of work and avoid implementation conflicts, overlaps, and delays.	✓ USDOL		