



**BUREAU OF INTERNATIONAL LABOR AFFAIRS**  
**UNITED STATES DEPARTMENT OF LABOR**



World Vision Mexico

# **INTERIM ASSESSMENT**

## **SOWING RIGHTS, HARVESTING BETTER FUTURES (SENDEROS) PROJECT**

March 2023

**Grantee:** Verité Inc.

**Project Duration:** December 2019 – December 2023

**Fiscal Year and Funding Level:** FY20: \$8,000,000.00

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**Evaluation Fieldwork Dates:** May 6, 2022 – July 1, 2022



## ACKNOWLEDGEMENT

This report describes the interim assessment of the Sowing Rights, Harvesting Better Futures (SENDEROS) Project. Fieldwork for this assessment was conducted in May, June and July of 2022. Rodolfo Cordova Alcaraz conducted this independent assessment in collaboration with the project team and stakeholders and prepared the interim assessment report according to the terms of reference specified in the contract with Verité. The facilitator would like to express sincere thanks to all the parties involved for their support and valuable contributions.

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Funding for this evaluation was provided by the United States Department of Labor under contract number IL-34209-19-75-K. This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does the mention of trade names, commercial products, or organizations imply endorsement by the United States Government.

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## LIST OF ACRONYMS

AIR	American Institutes for Research
CALLE	Compliance in Autoparts through Labor Law Enforcement project
CMEP	Comprehensive Monitoring and Evaluation Plan
CMS	Case Management System
CONADESUCA	<i>Comité Nacional para el Desarrollo Sustentable de la Caña de Azúcar</i>
DG	<i>Dirección General</i>
FAI	<i>Fundación Mexicana de Apoyo Infantil</i>
FOA	Funding Opportunity Announcement
GRID	Grievance and Information Dissemination System
ILAB	Bureau of International Labor Affairs
M&E	Monitoring and Evaluation
NOMs	<i>Normas Oficiales Mexicanas</i>
OCFT	Office of Child Labor, Forced Labor and Human Trafficking
OSH	Occupational safety and health
SADER	<i>Secretaría de Agricultura y Desarrollo Rural</i>
SENDEROS	Sowing Rights, Harvesting Better Futures Project
SHCP	<i>Secretaría de Hacienda y Crédito Público</i>
SIAPI	<i>Sistema de Apoyo al Proceso Inspectivo</i>
SNILE	<i>Sistema Nacional de Información Laboral y Empresas</i>
STPS	<i>Secretaría del Trabajo y Previsión Social</i>
TPR	Technical Progress Report
USDOL	United States Department of Labor
USMCA	United States – Mexico – Canada Agreement
WV	World Vision

## EXECUTIVE SUMMARY

### BACKGROUND AND CONTEXT

The SENDEROS Project is funded by the Bureau of International Labor Affairs (ILAB) of the United States Department of Labor (USDOL) and began operating in December 2019. It is a four-year project that aims to improve adherence to international labor standards in Mexico's agricultural sector. The project follows a geographic area-based approach, focusing on Nayarit and Jalisco, and is working to achieve three specific outcomes in collaboration with the implementing partners noted below:

- **Outcome 1:** Increased capacity by government officials to enforce labor laws specifically related to child labor, forced labor, occupational health and safety, and other acceptable working conditions in the agricultural sector. Interventions under this outcome are led by the American Institutes for Research (AIR) and are focused on working with *Secretaria del Trabajo y Previsión Social* (STPS).
- **Outcome 2:** Increased compliance with labor laws, including occupational safety and health and other unacceptable conditions of work, by private sector stakeholders in the agricultural sector. Interventions under this outcome are led by Verité and are focused on working with stakeholders in the sugarcane and tobacco sectors.
- **Outcome 3:** Increased knowledge about labor rights and options for accessing remediation of labor law violations. Interventions under this outcome are led by *Fundación Mexicana de Apoyo Infantil* (FAI) and World Vision (WV) and focus on workers in the sugarcane and tobacco supply chains.

Four months after the project was launched, the COVID-19 pandemic hit the world and changed many work dynamics. Where possible, activities were adjusted for virtual delivery and non-essential travel came to a halt. This had a significant impact on most of the SENDEROS project's activities, particularly those related to Outcomes 2 and 3.

### METHODOLOGY

The SENDEROS interim assessment aims to identify the following:

- a) Strengths that have enabled the project to make progress toward its goal and expected outcomes
- b) Challenges stakeholders encountered during implementation
- c) Lessons learned
- d) Promising practices

Thus, this assessment is not based on research questions or hypotheses to be tested. The interim assessment is qualitative in nature and is comprised of three complementary methods:

- Desk review — The facilitator reviewed a total of 24 project documents
- Eight focus group discussions
  - One with each implementing partner (AIR, FAI, Verité, and WV),
  - Three with private sector actors
  - Three with workers
  - One with STPS
- Four in-depth interviews — One interview with each implementing partner, with a total of 10 participants

## MAIN FINDINGS

### **Relevance and Coherence**

**Project Design:** The SENDEROS project is solid in its design. The theory of change for each of the expected outcomes is clear and defines how the set of activities lead to the achievement of expected outcomes. The monitoring and evaluation plan is also relevant, as indicators are well aligned with the expected results they intend to measure.

The connection with workers' protection is evident throughout the SENDEROS theory of change. All stakeholders confirmed that workers are at the center of the project.

**Multi-Stakeholder Approach:** The SENDEROS Project's relevance is further supported by the project's adaptive management approach and responsiveness to stakeholder needs. After facilitating initial conversations with key stakeholders, SENDEROS modified the original implementation strategy to better address stakeholder needs—particularly those of STPS, private sector actors, and workers—and to better respond to the local context. During focus group discussions, all stakeholders acknowledged that the project adds unique value for them.

### **Effectiveness and Efficiency**

**Project Achievement:** The level of achievement, as measured by the project's performance indicators at the time of the fieldwork, is low. Of the eleven output indicators, two show some progress toward targets, six show no progress, and three indicators were still in the process of being defined at the time of the assessment. This level of progress is mostly explained by the delays caused by the COVID-19 pandemic. Despite the challenges associated with the pandemic, the project has completed important milestones under each expected outcome as follows:

- Outcome 1: the project made progress in the programming tasks associated with updating STPS' case management system (CMS) focused on agriculture.
- Outcome 2: the project facilitated training on international labor standards, provided technical assistance to three private sector stakeholders (two sugar mills and producers associations and one tobacco company) on the development of continuous improvement due diligence plans and the design of due diligence tools.
- Outcome 3: the project successfully completed the planned communication campaign and began training workers from the sugarcane and tobacco sectors.

**Project Response to Effects of COVID-19:** The pandemic caused significant delays in key project activities for two main reasons: in-person activities stopped and STPS shifted its attention to the pandemic response.

In this context, SENDEROS adjusted its approach and continued advancing towards the expected outcomes. It created a COVID-19 monitoring mechanism to inform decision-making, which was led by the M&E team, and pivoted to a fully digital approach (including both virtual meetings and training activities) to continue advancing project implementation.

**Stakeholder participation:** All stakeholders are actively engaged in the project's activities. This high level of engagement is attributed to SENDEROS' effectiveness in

tailoring solutions to address stakeholder priorities and respond to their evolving needs, in turn securing their trust.

**Diversity:** SENDEROS has not adequately considered the diversity of workers' identities—including their ethnicity and native language—in the design and implementation of information and awareness raising campaigns and training materials for workers.

**Monitoring and Evaluation:** SENDEROS has a Comprehensive Monitoring and Evaluation Plan (CMEP), which describes the project's performance monitoring system and tools used for measuring progress toward indicator targets. The project regularly reports progress to USDOL through technical progress reports (TPRs).

All partners were involved in designing the project document and the CMEP, which facilitates tracking the progress for each outcome. SENDEROS periodically shares findings from ongoing project monitoring, including progress toward indicator targets, with all the project stakeholders, so they are informed of the project's progress.

Although the CMEP is operational, targets for three output indicators under Outcome 1 need to be defined.

### ***Sustainability***

**Likelihood of Sustainability:** The interim assessment found that results under Outcomes 2 and 3 were most likely to be sustained beyond the life of the project. Private sector stakeholders' ownership of SENDEROS due diligence tools is a likely contributor to the sustainability of Outcome 2. Evidence of workers' increased knowledge of labor rights and occupational safety and health (OSH) issues is a likely contributor to the sustainability of Outcome 3.

**Factors Strengthening Sustainability:** The interim assessment identified two factors that are contributing to project sustainability:

1. Regular communication between project partners and stakeholders
2. The design and implementation of tailored solutions for each and all project stakeholders, which has enhanced trust and facilitated collaboration

**Factors Limiting Sustainability:** The interim assessment identified one factor that might hinder sustainability: The project is still in the process of implementing changes to the CMS of the STPS, a key intervention under Outcome 1.



### Assessment of Project’s Level of Achievement and Sustainability

The interim assessment facilitator used a three-point scale recommended by USDOL to assess the level of achievement and sustainability of the project. Informed by insights and information gathered through focus group discussions and in-depth interviews, as well as the facilitator’s perspective of the context, the facilitator rated the SENDEROS Project’s achievement and sustainability under each outcome as low, moderate, or high. Ratings are based on three criteria:

- Progress toward indicator targets
- Contextual factors, including adaptations made in response to the COVID-19 pandemic.
- Stakeholder engagement in achieving the expected outcomes.<sup>1</sup>

Using the three-point scale and above criteria, the facilitator concluded:

- The overall rating for the project achievement is **moderate**.
- The overall rating for project sustainability is **moderate**.

Table 1 provides the achievement and sustainability rating for each outcome, as well as a detailed justification.

**Table 1. Performance Summary**

Performance Summary	Rating
<p><b>Outcome 1: Increased capacity by government officials to enforce labor laws specifically related to child labor, forced labor, occupational health and safety and other acceptable working conditions in the agricultural sector.</b></p>	
<p><b>Achievement:</b> Progress under Outcome 1 is moderate. Although no progress has been made toward performance indicator targets, the project adapted its strategy to continue advancing despite the pandemic. The assessment also found a high level of buy-in from STPS, the key stakeholder for this outcome.</p> <p><b>Sustainability:</b> The sustainability of Outcome 1 is rated as low because key activities under this outcome have not been implemented at the time of this assessment. Nonetheless, the high level of buy-in from STPS may facilitate progress under this outcome.</p>	<p><b>Achievement:</b> Moderate</p> <p><b>Sustainability:</b> Low</p>

<sup>1</sup> To determine the level of sustainability, the facilitator also considered the SENDEROS Project’s Sustainability Planning Matrix, which is included in the October 2021 TPR.

Performance Summary	Rating
<p><b>Outcome 2: Increased compliance with labor laws, including occupational safety and health and other unacceptable conditions of work, by private sector stakeholders in the agricultural sector.</b></p>	
<p><b>Achievement:</b> Progress under Outcome 2 is moderate. Although no progress has been made toward indicator targets, the project adapted its strategy to continue advancing during the pandemic and has a high-level of buy-in from private sector stakeholders.</p> <p><b>Sustainability:</b> Sustainability is high because private sector stakeholders are implementing the protocols, tools, and mechanisms developed by the project to deal with grievances. There is buy-in from private sector stakeholders and the protocols, tools, and mechanisms have been tailored to meet the specific needs of these stakeholders.</p>	<p><b>Achievement:</b> Moderate</p> <p><b>Sustainability:</b> High</p>
<p><b>Outcome 3: Increased knowledge about labor rights and options for accessing remediation of labor law violations.</b></p>	
<p><b>Achievement:</b> Progress under Outcome 3 is moderate. Some progress has been made toward performance indicator targets, the project adapted its strategy to continue advancing despite the pandemic, and there is strong buy-in from workers.</p> <p><b>Sustainability:</b> Sustainability under Outcome 3 is rated as moderate. The interim assessment found that workers value what they are learning through the project’s workshops and that their knowledge has increased. These findings complement efforts undertaken by private sector actors to enhance their due diligence tools and mechanisms.</p>	<p><b>Achievement:</b> Moderate</p> <p><b>Sustainability:</b> Moderate</p>

**LESSONS LEARNED**

Five key lessons were identified during this assessment:

1. The Mexican legal framework doesn’t allow governmental agencies to use data gathered by other non-governmental parties.

During the working session with implementing partners, they emphasized that it was important to take into consideration the existing legal barriers for non-governmental organizations to collect data and share it with governmental agencies so they can use it as part of the labor inspection process.

2. Tailored solutions and close collaboration enhance trust and ownership by private sector stakeholders and facilitate progress towards the expected outcomes.

Stakeholders are more likely to trust the project when they see the specific, relevant, and practical approaches and products the project delivers—in contrast to those designed from a desk, without adequate attention to the unique context of the operating environment or the needs of their intended users.

3. Access to technology does not mean that private sector stakeholders and workers will use it.

The option of using technology to replace in-person training for private sector stakeholders and workers has limited effectiveness in the agricultural sector due to existing gaps in the use of technology.

4. The presence of experienced staff dedicated to advancing private sector due diligence is crucial to SENDEROS' progress under Outcome 2 so far.

Interventions that have benefited from this are specifically the design of tools, such as codes of conduct and hiring policies and procedures in the sugarcane sector and the issuance of payment vouchers for workers in the tobacco sector.

5. It is important to start workers' training with less sensitive topics to ensure their engagement.

Workers shared that starting the training sessions with occupational safety and health topics generates trust and closeness between them and the partners. It allows an easier transition into more sensitive topics, like child labor.

#### **PROMISING PRACTICES**

The SENDEROS Project has developed a set of promising practices and the interim assessment has identified four that are particularly worth noting. Promising practices are explained in greater detail in Section 4.

1. The creation of an Ethics Committee for a tobacco company to respond to workers' needs.
2. Building on existing initiatives and common interests, particularly among private sector stakeholders, to enhance efficiency.
3. Scheduling workers' training during meals or breaks to better facilitate their learning.
4. Frequent and transparent communication that facilitates stakeholders' active engagement and participation.

#### **CONCLUSION AND KEY RECOMMENDATIONS**

The project is making progress toward all three expected outcomes. Implementation was heavily impacted by the COVID-19 pandemic, which is the main explanation behind the low progress toward performance indicator targets. However, the sound project design and adaptation strategies have enabled SENDEROS to keep advancing despite challenges. All stakeholders working with the project clearly see its value and have bought into its objective.

STPS understands the importance of enhancing its systems to improve their inspection capacities and is giving SENDEROS access to its data to ensure that this assistance strengthens what is already in place. In addition, the private sector is openly receiving SENDEROS' technical assistance to enhance their due diligence tools and mechanisms, in turn promoting compliance with labor laws. Workers are expanding their knowledge about their labor risks and rights.

## RECOMMENDATIONS

1. **Project achievement:** In one month, SENDEROS should assess which activities are delayed in each of the three outcomes, develop a concrete plan to address the existing delays, and make any corresponding adjustments to the workplan, CMEP and sustainability plan. SENDEROS should coordinate with USDOL on all proposed changes.
2. **Sustainability:** In one month, SENDEROS should review and adjust the sustainability plan, considering the delays associated with key activities under Outcome 1. SENDEROS should coordinate with USDOL on all proposed changes.
3. **Diversity:** SENDEROS should consider the ethnic identities and native language of workers in the design of information and awareness raising campaigns and training materials for workers. This effort should start now and continue until the end of the project.
4. **Monitoring and Evaluation:** SENDEROS should set, in one month, the remaining performance indicator targets under Outcome 1, define the tasks required to achieve those targets, and incorporate them in the workplan. These changes should be reflected in the CMEP and sustainability plan and communicated to USDOL.

## 1. PROJECT CONTEXT AND DESCRIPTION

The SENDEROS Project is a four-year project that began operations in December 2019 and is implemented in Mexico, mainly in Jalisco and Nayarit, following an “area-based approach.” An area-based approach is one that “targets all forms of child labor, forced labor, occupational health and safety labor risks, and other labor rights violations (as stated in the project outcomes) within a defined geographic area”.<sup>2</sup> In the SENDEROS Project, Verité—in partnership with the American Institutes for Research (AIR), *Fundación Mexicana de Apoyo Infantil* (FAI), and World Vision (WV)—aims to improve adherence to international labor standards in Mexico’s agricultural sector. To address the project’s objective, SENDEROS expects to achieve the following outcomes:

1. Increased capacity of government officials to enforce labor laws specifically related to child labor, forced labor, occupational safety and health and other unacceptable conditions of work in the agricultural sector. (Outcome 1)
2. Increased compliance with labor laws, including occupational safety and health and other unacceptable conditions of work, by private sector stakeholders in the agricultural sector. (Outcome 2)
3. Increased knowledge about labor rights and options for accessing remediation of labor law violations. (Outcome 3)

The project works with the public sector, including government officials, inspectorate authorities, and public agencies such as the Secretary of Labor and Social Services (*Secretaría del Trabajo y Previsión Social*, STPS). In addition, the project works with private sector stakeholders, such as mills, growers’ associations, and producers, as well as with sugarcane and tobacco workers, to raise awareness and knowledge of labor rights, labor laws, and occupational health and safety. There are four implementing partners in the project: Verité, who leads the overall project as well as activities specific to Outcome 2; AIR, who leads activities under Outcome 1; and FAI and WV, who lead activities under Outcome 3.

SENDEROS has primarily focused on the sugarcane sector, with an emphasis on the supply chains of three sugarcane mills (one in Nayarit and two in Jalisco). In late 2021, the project expanded into the tobacco sector in Nayarit, as was originally planned. By covering two supply chains, SENDEROS hopes to demonstrate the replicability of the project’s approach in other crops and worker populations, as well as its relevance to state-regulated sectors, in addition to those regulated at the federal level.

Table 2, below, presents the SENDEROS Project’s full results framework, including the outputs and sub-outcomes that together contribute to each expected outcome.

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<sup>2</sup> See ILAB. (2019). Notice of Availability of Funds and Funding Opportunity Announcement for Improved Adherence to International Labor Standards in the Agricultural Sector in Mexico. [FOA-ILAB-19-06. ILAB - USDOL](https://www.grants.gov/web/grants/view-opportunity.html?oppld=319075). August 8, 2019. <https://www.grants.gov/web/grants/view-opportunity.html?oppld=319075>



**Table 2. SENDEROS Results Framework**

Outcome	Sub-Outcome	Output
<p>Outcome 1: Increased capacity of government officials to enforce labor laws specifically related to child labor, forced labor, occupational safety and health and other unacceptable conditions of work in the agricultural sector.</p>	<p>Sub-Outcome 1.1: Increase in knowledge and in government officials' capacity to identify, track and ensure remediation of labor law violations in the sugarcane sector.</p>	<p>Output 1.1.1. Enhanced end-to-end case management system (CMS) and sugarcane sector-specific functionalities developed.</p> <p>Output 1.1.2. Development and facilitation of a data-driven, targeted labor inspection strategy in the sugarcane sector.</p> <p>Output 1.1.3. Training provided to labor inspectorate authorities and labor inspectors in the use of the enhanced CMS and implementation of the targeted labor inspection strategy, designed to effectively address labor violations in the sugarcane sector.</p>
	<p>Sub-Outcome 1.2. Increase in the sharing of data and other relevant information by government agencies regarding labor law enforcement and tracking of labor violation cases in the sugarcane sector.</p>	<p>Output 1.2.1. Data and information sharing agreements facilitated between STPS and other government agencies relevant to labor law enforcement and tracking of labor violation cases within the sugarcane sector.</p> <p>Output 1.2.2. Data and information sharing facilitated between CMS and relevant government agency electronic systems.</p>
<p>Outcome 2: Increased compliance with labor laws, including occupational safety and health and other unacceptable conditions of work, by private sector stakeholders in the agricultural sector.</p>	<p>Sub-Outcome 2.1. Increase in the use of tools and resources available for compliance with labor laws in the agricultural sector by the private sector. (Occupational safety, health, other unacceptable working conditions).</p>	<p>Output 2.1.1. Analysis of private sector labor compliance completed.</p> <p>Output 2.1.2. Private sector partners trained on key topics in enforcement and on the use of upgraded tools and other resources.</p> <p>Output 2.1.3. Labor information data aggregation and analytics from communication channels shared with STPS.</p> <p>Output 2.1.4. Linkages between communication channels and private sector monitoring and remediation systems in the targeted project regions established.</p>

Outcome	Sub-Outcome	Output
	<p>Sub-Outcome 2.2. Increase in functionality of communication channels in the agricultural sector.</p>	<p>Output 2.2.1. Communication channels to link workers to appropriate social and legal services in the targeted project regions facilitated.</p> <p>Output 2.2.2. Communication channels established for agricultural workers in the targeted project regions.</p>
<p>Outcome 3: Increased knowledge about labor rights and options for accessing remediation of labor law violations.</p>	<p>No sub-outcomes identified in the CMEP.</p>	<p>Output 3.1. Farmworkers trained on child labor, forced labor, occupational health and safety, and other unacceptable working conditions.</p> <p>Output 3.2. Farmworkers and other stakeholders informed on the use of communication channels, child labor, forced labor, occupational health and safety, and other unacceptable working conditions.</p> <p>Output 3.3 Private sector stakeholders, including mills and growers' associations, informed on the benefits of hiring certified workers and registering them into social security.</p> <p>Output 3.4 Labor competence standards in the sugarcane sector updated to include child labor, forced labor, and occupational health and safety topics.</p>





## 2. INTERIM ASSESSMENT PURPOSE

The interim assessment, conducted during the project's midpoint, intends to generate participatory learning and facilitate actionable discussions between USDOL representatives and SENDEROS' project staff around project performance, lessons learned, and recommendations for the remainder of the project. As such, the Interim Assessment has the following objectives:

1. Determine the project's progress, successes, and implementation challenges for each component area (outcome) as well as for the overall project objective.
2. Identify promising practices or lessons learned related to launching and implementing activities, both for the project and for ILAB.
2. Identify opportunities for the project to enhance its likelihood of achieving and sustaining results.
3. Identify action items or adjustments that need to be made to both achieve the intended outcomes and contribute to the project's objective.
4. Identify potential opportunities and barriers to improve project performance.
5. As a cross-cutting issue, identify the impacts of the COVID-19 pandemic on the project's implementation, including the project design and expected results.

### 1.1. METHODOLOGY

The interim assessment is primarily qualitative in nature, including focus group discussions and in-depth interviews. Guided by semi-structured interview guides, the external facilitator posed a series of questions to key stakeholder groups to explore the strengths that have enabled the project to make progress toward its goals, the challenges stakeholders perceive in achieving said goals, the lessons learned during the implementation process, and other relevant insights that may inform potential modifications and next steps. This assessment is not based on hypotheses that are sought to be answered or tested.

The interim assessment is comprised of three main methods: desk review, focus group discussions, and in-depth interviews, as described below:

1. **Desk review.** The facilitator reviewed a total of 24 project documents, including the original technical proposal, the comprehensive monitoring and evaluation plan (CMEP), technical progress reports (TPRs), and the project's social media channels. In addition, the facilitator reviewed background information to prepare for focus group discussions with STPS and private sector actors in Jalisco and Nayarit.
2. **Focus group discussions.** The Interim assessment included eight focus group discussions with key stakeholder groups. Each focus group discussion was facilitated using a discussion guide designed to address the interim assessment's information needs. Discussions were then transcribed for data analysis. Focus group discussions included the following stakeholder groups:

- **Implementing partners.** The facilitator organized a virtual working session with participants from the managerial and technical teams from the four implementing partners. The goal of this session was to gather implementing partners' perspectives on the progress, strengths, challenges, lessons learned, and impacts of the COVID-19 pandemic on the project.
  - **Private sector stakeholders.** The facilitator facilitated three in-person focus group discussions with private sector actors.
  - **STPS.** The facilitator conducted an in-person focus group discussion with STPS.
  - **Workers.** The facilitator conducted three virtual focus groups with sugarcane and tobacco workers from Jalisco and Nayarit.
3. **In-depth interviews.** The facilitator held in-depth interviews with implementing partners reaching a total of 10 participants, including the SENDEROS Project Director and the Monitoring and Evaluation Specialist, as well as key personnel from AIR, FAI, and WV. The purpose of the interviews was to dig deeper into some of the themes that emerged during the focus group discussions. For example, interviews aimed to better identify the specific contributions of the project to the STPS systems and to explore the different components of the communication strategy.

## 2. INTERIM ASSESSMENT FINDINGS

This section summarizes the key findings of the interim assessment, which are based on the document review and the key themes identified during the focus group discussions and in-depth interviews.

### 2.1. RELEVANCE AND COHERENCE

**Project Design:** The SENDEROS project is solid in its design. The project was built with a sound understanding of the Mexican context and of the needs of the project's key stakeholders: STPS, private sector actors, and workers.

Implementing partners have extensive knowledge about the issues the project is addressing, as evidenced by the problem analysis included in the SENDEROS Project Document. This knowledge and deep understanding of the context is also evident in the assumptions articulated alongside the project's theory of change. It is important to note that the project's original implementation approach changed in response to specific information about the local context and the unique needs of each of the stakeholders.

Each implementing partner's expertise in the project component they are leading became clear during the virtual working session with partners and the in-depth interviews: AIR on STPS' inspection capacities and needs (Outcome 1), Verité on private sector engagement and collaboration (Outcome 2), and FAI and WV on worker engagement and outreach (Outcome 3). This knowledge and expertise of each of the stakeholders translated into SENDEROS sound project design, as evidenced by the activities, outputs, and indicators included in both the Project Document and CMEP. For instance, the outcome indicators are clearly aligned to the activities and outputs

that contribute to each outcome. Most importantly, it is very clear that workers' protection is at the center of the project, as all project activities and outputs are aligned with this crosscutting theme. During the focus group discussions, all stakeholders acknowledged the SENDEROS Project's core mandate to protect workers, both in terms of labor rights and occupational safety and health.<sup>3</sup>

**Multi-sector Approach:** The SENDEROS Project responds to the needs of its key stakeholders: STPS, the private sector, and workers. Most importantly, via focus group discussions and in-depth interviews, the assessment found that SENDEROS adds unique value for each of these key stakeholder groups.

Under Outcome 1, STPS stakeholders acknowledged that SENDEROS is adding value by helping them strengthen the Case Management System and the agency's inspection capacities. SENDEROS is working on the *Sistema de Apoyo al Proceso Inspectivo* (SIAPI system) so that an inspection in the agricultural sector can be carried out without an internet connection. The project is modernizing STPS' verification and complaint processes. One stakeholder noted that modernization "can serve as an enabler to foster a culture of labor complaints."

The SENDEROS Project's value-add under Outcome 2, which focuses on building due diligence capacity in the private sector, is also clear. There was not a single conversation with the private sector that did not emphasize the project's contributions to date. Most significantly, the project has helped articulate exactly which measures are active, which ones need to be developed further, and how new measures can be collaboratively created to further advance workers' protection.<sup>4</sup>

Under Outcome 3, SENDEROS adds direct value to workers through the training sessions that intend to raise workers' awareness of their labor rights and risks. This value-add is reinforced by the due diligence work with the private sector and the inspection capacity strengthening work with STPS, as both initiatives contribute to increased protection for workers. Workers expressed that the project has benefited them by increasing their awareness and knowledge of their labor rights and of the risks involved in working in the field. This theme arose in all three focus groups with workers and almost all participants mentioned this benefit specifically. The frequency of this response supports the conclusion that these perceptions are consistent irrespective of sector, gender identity, or race. The interim assessment also found that workers value all of the topics addressed during the trainings: occupational safety and health, child labor, forced labor, and violence-free workplaces.

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<sup>3</sup> In the words of one private sector actor: *The worker is settling in very well because the trainers know [about the topics]. The workers go to the meetings that are held on Saturdays with their traditional customs. **They like to participate so much that they feel proud and go with their typical customs to the training.** This shows that the training motivates them. The people from SENDEROS have knowledge and experience working with people in the field. That caught my attention from the beginning.*

<sup>4</sup> One private sector stakeholder noted: *In other projects we had not identified how to solve challenges, for example, the grievance mechanism. [...]. We had not been able to implement it, **but in SENDEROS we are making progress, we are focusing on it.** This is going to benefit us because it leaves an installed capacity.*

## 2.2. EFFECTIVENESS AND EFFICIENCY

**Project Achievement:** Based on SENDEROS' performance indicators, the level of achievement of the project is low. Of the eleven output indicators, two of have demonstrated some progress toward targets, six show no progress, and three indicators were in the process of being defined at the time of the assessment. This level of progress is mostly explained by the delays caused by the COVID-19 pandemic.

At the time of this assessment there were activities that had not started under all three outcomes. These delays impact the workplan and the CMEP. They are also hindering progress toward expected outcomes and the possibilities for the project's sustainability.

Despite slow progress toward performance indicator targets, the SENDEROS Project has made progress on its activities. The TPRs provide evidence of the project's advancements under each outcome, as described below.

Under Outcome 1, at the time of this assessment SENDEROS had made progress in the programming tasks related to the CMS. This includes the development of new functionalities, such as the registration form for labor inspections. SENDEROS has also begun preparing for the programming of the offline module. STPS is actively participating in the review and validation of these new developments. At the time of this assessment, the data-driven inspection strategy was yet to begin.

Under Outcome 2 the project was working with two sugar mills and producers' associations and with one in the tobacco sector, providing three types of services: trainings on international labor standards, technical assistance for the construction of the continuous improvement due diligence plans, and the design of due diligence tools. At the time of this assessment, activities related to Outputs 2.1.3, 2.1.4, 2.2.1, and 2.2.2 were yet to begin. These outputs are related to the Grievance and Information Dissemination System (GRID) that is in the process of being adjusted based on the Mexican legal framework.

The most notable progress at the time of this interim assessment was related to Outcome 3, particularly the change in workers' knowledge. FAI and WV carried out pre- and post-tests during each workshop and shared this data with the facilitator. In FAI's case, the data shows that at least 28 percent of workers (from a sample of 150 training participants), demonstrated an increase in knowledge. In the case of WV, 38 percent of training participants (from a sample of 50) increased their knowledge. It is important to emphasize that this mid-term interim assessment is not intended to make a quantitative assessment of the project's contribution to increased knowledge or awareness. These figures are provided solely to illustrate the project's progress under this outcome. Activities related to Output 3.3 and Output 3.4 were yet to begin at the time of this assessment.

**Project Response to Effects of COVID-19:** The pandemic caused significant delays in project implementation for two main reasons: in-person activities stopped and STPS shifted its attention to the pandemic response.

Travel restrictions were in place from March 2020 to May 2021. In-person activities began in June 2021, but another travel restriction began in December 2021 and continued through February 2022. In March 2022 in-person activities resumed.

In this context, SENDEROS adapted their strategy to continue advancing towards the expected outcomes. During the travel restriction period the project hired its personnel and finalized contracting its sub-awards with partner agencies. In addition, STPS reviewed the project design and the SENDEROS team developed the CMEP, communication strategy, and project website.

Under Outcome 1, during the first year of the project, SENDEROS made progress assessing labor laws and the STPS information systems. This assessment facilitated a more informed engagement with STPS during the second year, allowing SENDEROS to better address their needs.

Under Outcome 2, the project engaged with private sector stakeholders virtually through June 2022, when in-person activities resumed. This limited the type and depth of conversations that the SENDEROS team had with them. To ensure openness and transparency from private sector stakeholders, SENDEROS decided to shift their approach and propose that private sector stakeholders sign confidentiality agreements (instead of collaboration agreements, as was originally planned). The project finalized agreements with private sector stakeholders once in-person activities resumed.

Under Outcome 3, SENDEROS made progress on several activities despite COVID-19 related delays. The project team completed the workers' profile study for both the sugarcane and tobacco sector. It also designed the workers' training curriculum and materials and started local promoters' training. Training with workers began in March 2022. Despite delays, the project adapted and made progress toward some of the indicator targets, and in some cases exceeded them. For instance, SENDEROS expected to reach 4,810 farmworkers and other stakeholders through the information campaign, but at the time of this assessment had reached 7,953 individuals.

Crosscutting across all outcomes, SENDEROS also created a COVID-19 monitoring mechanism to support the project's adaptive management.

**Stakeholder participation:** All stakeholders are actively engaged in the project's activities. This high level of engagement is attributed to SENDEROS' effectiveness in tailoring solutions to address stakeholder priorities and respond to their evolving needs, in turn securing their trust.

SENDEROS implementing partners clearly identified stakeholder needs based on their knowledge, expertise, and previous work in their respective sectors. As stated above, this experience is evidenced in the Project Document. SENDEROS has also successfully built trust with all stakeholders—for this, confidentiality has been key. One notable example is the self-assessment SENDEROS developed for companies to evaluate their standing on all aspects of due diligence. This approach helps stakeholders feel comfortable to provide an honest assessment of their existing systems, gaps, and challenges, in turn laying the foundation for a productive collaboration with the SENDEROS project.

Another key factor contributing to SENDEROS' strong stakeholder participation is the project's strategy of tailoring solutions to address each stakeholder's needs. For instance, SENDEROS has provided technical assistance to solve the specific needs of private sector stakeholders, rather than approaching them with standard, "one-size-fits-all" solutions. In the words of one private sector actor: "People in SENDEROS solve the gaps for us, such as the complaints mechanism and the creation of the

Ethics Committee. The idea of how to form it came from SENDEROS; we had no idea how to form it.” This approach is also useful for continuing to build trust and promote the project’s value.

**Diversity:** During the focus group discussions with private sector stakeholders, diversity among workers emerged as an important issue, particularly the challenge of creating culturally appropriate materials. This issue also came up during one of the sessions with workers. As one private sector stakeholder noted, “Many people come from indigenous communities, and we need to develop materials in their native language, taking their traditions into account.” The relevance of generating training sessions and materials in workers’ native languages was emphasized by the focus group facilitation. In one session, translators needed to intervene to help enable a dialogue between the facilitator and the workers. At one point during the session, multiple indigenous participants mentioned that they wanted to participate but did not feel confident enough in Spanish to do so directly.

This diversity lens is also missing from the SENDEROS communication strategy. The definition of audience identity markers is critical to any strategy because it helps inform the messaging strategy. However, the messages included in the communication strategy document and that have been deployed through Facebook and Twitter are generic. This is important because understanding of key concepts may differ among workers, depending on who they are, their identities, their lived experiences, and other contextual factors.

**Monitoring and Evaluation:** The project has a Comprehensive Monitoring and Evaluation Plan (CMEP), which describes the project’s performance monitoring system and tools used for measuring progress toward indicator targets. The project regularly reports progress to the USDOL through the TPRs. An important finding from the interim assessment is that all implementing partners value and acknowledge how the monitoring process was developed: based on collaboration. All partners were involved in designing the Project Document and the project CMEP, which facilitates tracking the progress for each outcome.

SENDEROS periodically shares findings from ongoing project monitoring, including progress toward indicator targets with all the project stakeholders, so they are informed of the project’s progress and results.

Despite this progress, targets for the three output indicators under Outcome 1 have yet to be defined.

### 2.3. SUSTAINABILITY

**Likelihood of Sustainability:** At the time of the interim assessment, the project activities that were most likely sustainable were related to Outcome 2 and Outcome 3. The sustainability of Outcome 1 was uncertain at the time of the assessment, because the project is still in the process of implementing changes to STPS’ CMS. Nonetheless, the fact that there is high buy-in from STPS is a positive sign. See the Recommendations section for more details.

Under Outcome 2, sustainability is expected to be reached through the formulation, development, and update of due diligence tools and their adoption by private sector stakeholders. These tools have been developed and updated in close collaboration with private sector stakeholders, increasing the ownership and eventual uptake by

private sector actors. This includes, for example the code of conduct and clear hiring procedures created for the sugarcane sector.

Under Outcome 3, sustainability is likely to be achieved due to a combination of two important factors. On the one hand, training activities for workers are increasing their knowledge of their labor rights and OSH issues. On the other hand, high buy-in from private sector stakeholders will facilitate productive engagement with the project, allowing SENDEROS to share key information, such as the importance of hiring certified workers. These factors complement the efforts that private sector stakeholders are already making to improve their due diligence processes. The project is moving in the right direction, as shown by the results and progress toward indicator targets under Outcome 3.

**Factors Strengthening Sustainability:** The interim assessment identified two important factors that are contributing to the project's sustainability: the ongoing communication between project partners and stakeholders and the tailored solutions SENDEROS has been designing and implementing under each outcome. Taken together, these factors have enhanced trust and facilitated collaboration with all stakeholders.

Frequent communication has been key to enhancing trust and close collaboration with all stakeholders. The implementing partners have been communicating proactively in different moments and through different means about the scope of the project and their openness to collaboratively design solutions to achieve the expected outcomes.

**Factors Limiting Sustainability:** The interim assessment identified one factor that may limit sustainability: At the time of this assessment, it is unclear if Outcome 1 will be sustainable, because the project is still in the process of implementing activities under Outcome 1, particularly changes to STPS' CMS. See the Recommendations section for more details.



### 3. LESSONS LEARNED AND PROMISING PRACTICES

One of the goals of this interim assessment is to identify lessons learned and promising practices. To generate this learning, relevant questions were included in the focus group discussions with key stakeholder groups. Some of the insights outlined below also emerged from the in-depth interviews with the four SENDEROS implementing partners.

For this assessment, lessons learned are understood as knowledge gained through project implementation with key stakeholders that, when applied, can help the SENDEROS project achieve its goals. A promising practice is an approach, strategy, or innovation developed by the project that has either demonstrated effectiveness or shows significant potential to help the project advance towards its goal.

#### 3.1. LESSONS LEARNED

The facilitator identified five key lessons during the interim assessment.

1. The Mexican legal framework doesn't allow governmental agencies to use data gathered by other non-governmental parties.

One key lesson that emerged through the working session with partners is that in addition to the pandemic and the complexity of the project's relationship with STPS, it was important to take into consideration the existing legal barriers for non-governmental organizations to collect data and share it. This barrier limits the data available to governmental agencies as part of the labor inspection process. Since this approach was part of SENDEROS' original implementation strategy, this unforeseen legal challenge contributed to implementation delays in activities under Outcome 1.

2. Tailored solutions and close collaboration enhance trust and ownership by private sector stakeholders and facilitate progress toward the expected outcomes.

Stakeholders are more likely to trust the project when they see the specific, relevant, and practical approaches and products the project delivers—in contrast to those designed from a desk, without adequate attention to the unique context of the operating environment or the needs of their intended users. With the private sector, for example, supply chain due diligence tools were designed to respond to each stakeholder's needs and the unique characteristics of each supply chain, rather than attempting to homogenize them across the board. This approach takes time because it involves carefully listening to stakeholders, then producing tailored solutions based on the companies' needs. The interim assessment found that this process is key to advancing towards the project's expected outcomes. This approach has proven to be effective with STPS and workers as well. The way that SENDEROS listened to STPS and tailored solutions to address their needs has enhanced the level of trust between the project and the agency. The project acknowledges that dealing with complex situations requires building a foundation of trust among partners and key stakeholders, which can only be achieved through close collaboration over time.

3. Access to technology does not mean that private sector stakeholders and workers will use it.

The option of using technology to replace in-person trainings for private sector stakeholders has limited effectiveness in the agricultural sector due to existing gaps among producers and workers in the use of technology. Studies conducted by the project show that while access to technology in the intervention areas is very good, the use of technology is limited to a few activities that do not require significant immersion on the part of the users. This contrast between technology access and use is exemplified by the way in which some workers use their cell phones: they may have a cell phone with access to mobile data but may not be fully or properly using all the tools on the device.

4. The presence of experienced staff dedicated to advancing private sector due diligence is crucial to SENDEROS' progress under Outcome 2 so far.

Having staff focused on advancing due diligence in the private sector, such as social workers, facilitates collaboration between the project team and supply chains in the implementation of SENDEROS activities. To date, SENDEROS has had the most success in Outcome 2 activities with private sector stakeholders who are more open to hiring dedicated staff to work on due diligence matters. The project is gaining more traction with these types of organizations because they have dedicated staff available to support project activities. Interventions that have most benefited from this staffing approach are the due diligence tools, such as codes of conduct and hiring policies and procedures in the sugarcane sector, and the issuance of payment vouchers for workers in the tobacco sector.

5. It is important to start workers training with less sensitive topics to ensure their engagement.

Workers shared that starting the training sessions with occupational safety and health topics generates trust and closeness between them and the partners. This approach facilitates an easier transition into more sensitive topics, such as child labor. In cases where the training started with sensitive topics such as forced labor and child labor, implementing partners noted that workers were more hesitant and uncomfortable during the training.

### **3.2. PROMISING PRACTICES**

The interim assessment identified the following four promising practices.

1. The creation of an Ethics Committee for a tobacco company to respond to workers' needs.

One important contribution that has emerged from SENDEROS is the Ethics Committee established by a participating tobacco company.<sup>5</sup> The structure and

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<sup>5</sup> In the words of a private sector stakeholder: "We are working with SENDEROS on an Ethics Committee. We had no idea how to form it. There we (the company) and the growers' organization are involved. Engaging with the growers in the Ethics Committee will allow us to resolve situations that arise on a day-to-day basis and that sometimes we had to deal with from within the company. This way, with both parties involved, it has more value, because everyone takes ownership."

criteria to create this new committee were developed in collaboration with SENDEROS under Output 2.1.2 of the project. This is the first step for the tobacco company to develop a grievance mechanism that responds to workers' needs. This is also an example of how the project has been reading the moment and responding to each company's specific needs. This committee leverages the compliance committee already in place before the project began and is considered a promising practice for potential replication.

2. Building on existing initiatives and common interests, particularly among private sector stakeholders, to enhance efficiency.

Throughout implementation, SENDEROS has built on existing efforts or progress made by different stakeholders, both from the public and private sectors. Identifying, valuing, and recognizing participating stakeholders' progress and common interests has helped the project determine how to adapt, improve, or expand capacities, in turn enhancing the project's efficiency. This approach also increases stakeholders' ownership of the changes and outcomes that have been achieved both through the project's interventions and through their own initiatives. The project's capacity building and facilitation approach, which includes integrating stakeholder experiences into the intervention strategies, has proven to be effective and could be adopted as standard practice for the remaining implementation period.

SENDEROS' work with one sugarcane company helps exemplify this promising practice. When SENDEROS arrived, the company was already working on a code of conduct. However, the individuals drafting the document were not familiar with the exact content requirements outlined in the national legal framework. SENDEROS was proactive in supporting the company to build on what they had started to develop a strong policy.

3. Scheduling workers' training during meals or breaks to better facilitate their learning.

In the case of the sugarcane sector, the time of day that training sessions were scheduled presented a particular challenge for the project. Technical training sessions often take place at the beginning of harvesting activities, while other work sessions may take place at the end of the day once harvesting activities are complete. SENDEROS consulted with different partners, including farm workers, on the best time to conduct training and learned that workers pay more attention when the sessions are short and take place during break times associated with meals directly at the cutting fronts. This benefits the farm workers in two ways: on the one hand, it allows them to directly connect the topics with the farm work and motivates the participation of all the workers present on the site; and on the other hand, by using rest and relaxation times, it facilitates the workers' full concentration and better understanding of the topics addressed.

4. Frequent and transparent communication that facilitates stakeholders' active engagement and participation.

Throughout implementation SENDEROS has been communicating frequently and transparently with project stakeholders. All interventions were developed in consultation with each of the stakeholders before implementation began. This approach helped stakeholders better understand the purpose of the work, ensure that the actions respond to their needs, and create space for suggesting adjustments. Their voices were heard, and their opinions were incorporated into the activities.

STPS is perhaps the most relevant example, but SENDEROS has also applied this strategy to its work with private sector stakeholders and workers, albeit in a more limited way. Throughout implementation, SENDEROS has facilitated effective communication with stakeholders by reading the moment and understanding their existing capacities. This collaborative, communicative approach helps stakeholders understand that it is better to work together and solve issues in a proactive and organized manner by receiving technical assistance from the project.

## 4. CONCLUSION

SENDEROS has three expected outcomes:

- Outcome 1: Increased capacity by government officials to enforce labor laws specifically related to child labor, forced labor, occupational health and safety, and other acceptable working conditions in the agricultural sector. This focuses on working with STPS and is being led by AIR.
- Outcome 2: Increased compliance with labor laws, including occupational safety and health and other unacceptable conditions of work, by private sector stakeholders in the agricultural sector. This outcome focuses on working with two supply industries in the sugarcane and tobacco sectors and is being led by Verité.
- Outcome 3: Increased knowledge about labor rights and options for accessing remediation of labor law violations. This is led by FAI and WV and focuses on workers in the sugarcane and tobacco supply chains.

The interim assessment found that the overall level of achievement of the project is **moderate** and that the overall level of sustainability is also **moderate**.

### ***Relevance & Coherence***

**Project Design:** The SENDEROS project is solid in its design, and it has put workers at the cornerstone of its activities. Based on active listening to and open engagement with stakeholders, it has adjusted its approach to better address their needs and the local context. This approach is valued by all project stakeholders and helps ensure their buy-in of project activities, in turn facilitating advancement towards the expected outcomes.

**Multi-sector Approach:** The project responds to the needs of its stakeholders: those of STPS, private sector stakeholders, and workers. During focus group discussions, all stakeholders acknowledged that the project adds a unique value to their work. STPS understands the importance of enhancing its systems to improve their inspection capacities and is giving the project access to ensure that the assistance strengthens what is already in place. The private sector is openly receiving assistance from SENDEROS to enhance their tools and mechanisms to ensure compliance, because they recognize the expertise of the SENDEROS team and want to collaborate more deeply with them. Workers are increasing their knowledge of the hazards related to their line of work and of their labor rights.

### ***Effectiveness and Efficiency***

**Project Achievement:** At the time of this assessment there were activities that had not started under all three outcomes, based on the progress described in the TPRs. These delays impact the workplan and the CMEP. They are also hindering progress toward expected outcomes and the possibilities for the project's sustainability.

The level of achievement, as measured by the project's performance indicators, is low. Of the eleven output indicators, two show some progress toward targets, six show no progress, and three indicators were still in the process of being defined at the time of the

assessment. This level of progress is mostly explained by the delays caused by the COVID-19 pandemic and because of the limitations of the legal framework that does not allow some components of the project to be implemented, including the GRID. Despite these limitations, the project is progressing towards the expected outcomes.

Under Outcome 1, at the time of this assessment, SENDEROS made progress in the programming tasks related to the CMS focused on agriculture, including the development of new functionalities, such as the registration form for documenting labor inspections. SENDEROS also began preparing to program the offline module. These tasks are being carried out with the active participation of STPS.

Under Outcome 2 the project has facilitated training on international labor standards. SENDEROS has also provided technical assistance for the development of continuous improvement plans and due diligence tools for two sugar mills and one in the tobacco sector. At the time of this assessment, SENDEROS was in the process of starting work with one or two additional stakeholders to reach the five companies originally targeted. By creating tools, mechanisms, and capacities within these companies, SENDEROS is contributing to increasing their compliance with labor laws and providing remediation options for workers.

At the time of this assessment, activities related to Outputs 2.1.3, 2.1.4, 2.2.1, and 2.2.2 were yet to begin. These outputs are related to the GRID that is in the process of being adjusted based on the Mexican legal framework.

Under Outcome 3, the project is building workers' capacity and increasing their knowledge of labor rights and occupational safety and health issues. The communication campaign has achieved its goal. Activities related to Output 3.3 and Output 3.4 were yet to begin at the time of this assessment.

**Project Response to Effects of COVID-19:** The pandemic caused significant delays in key project activities for two main reasons:

- In-person activities stopped.
- STPS shifted its attention to the pandemic response.

In this context, SENDEROS adjusted its approach and continued advancing towards the expected outcomes. It created a COVID-19 monitoring mechanism to inform decision-making, which was led by the M&E team, and pivoted to a fully digital approach (including both virtual meetings and trainings) to continue advancing project implementation.

**Stakeholder participation:** All stakeholders are actively engaged in the SENDEROS Project's activities. The interim assessment identified three key factors contributing to this engagement:

- The project responds to their needs.
- It has built trust with all stakeholders.
- It has tailored solutions according to stakeholders' specific needs.

This approach has facilitated stakeholders' active engagement in the project.

**Diversity:** SENDEROS has not adequately considered the diversity of workers' identities—including their ethnicity and native language—specifically in the design of materials for both training and communication activities.

**Monitoring and Evaluation:** The project has a CMEP, an active monitoring system, and processes for regularly reporting progress to USDOL. All partners were involved in designing the Project Document and the CMEP, which facilitates tracking the progress for each outcome. SENDEROS periodically shares information with all project stakeholders, so they are informed of the project's progress. Despite this progress, targets for three output indicators are yet to be developed.

### **Sustainability**

**Likelihood of Sustainability:** The interim assessment found that results under Outcomes 2 and 3 were most likely to be sustained beyond the life of the project. Private sector stakeholders' ownership of SENDEROS due diligence tools is a likely contributor to the sustainability of Outcome 2. Evidence of workers' increased knowledge of labor rights and OSH issues is a likely contributor to the sustainability of Outcome 3, such as the high buy-in from private sector stakeholders.

**Factors Strengthening Sustainability:** There are three factors that are contributing to sustainability: regular communication between project partners and stakeholders, active listening to stakeholder needs, and the design and implementation of tailored solutions for each and all project stakeholders, which has enhanced trust and facilitated collaboration.

**Factors Limiting Sustainability:** The interim assessment identified one factor that might hinder sustainability: That the project is still in the process of implementing changes to STPS' CMS, a key intervention under Outcome 1.

## 5. RECOMMENDATIONS

Based on the document review, focus group discussions, and in-depth interviews, the interim assessment facilitator identified four key recommendations. Table 3 presents a summary of the recommendations and supporting evidence from the interim assessment.

**Table 3. Recommendations and Supporting Evidence**

Recommendations	Evidence
<p><b>Project achievement:</b> In one month, SENDEROS should assess which activities are delayed in each of the three outcomes, develop a concrete plan to address the existing delays, and make any corresponding adjustments to the workplan, CMEP and sustainability plan. SENDEROS should coordinate with USDOL on all proposed changes.</p>	<p>At the time of this assessment there were activities that had not started under all three outcomes. The facilitator determined this by reviewing the TPRs. These delays impact the workplan and the CMEP. They are also hindering progress toward expected outcomes and the possibilities for the project’s sustainability.</p>
<p><b>Sustainability:</b> In one month, SENDEROS should review and adjust the sustainability plan, considering the delays associated with key activities under Outcome 1. SENDEROS should coordinate with USDOL on all proposed changes.</p>	<p>At the time of this assessment, the project activities that were most likely sustainable were related to Outcome 2 and Outcome 3. There is one factor that is hindering sustainability on Outcome 1: SENDEROS is still in the process of implementing changes to the CMS of the STPS. This conclusion is based on review of the TPRs, the focus group discussion with STPS, and two in-depth interviews.</p>
<p><b>Diversity.</b> SENDEROS should consider the ethnic identities, and native language of workers in the design of information and awareness raising campaigns and training materials for workers. This effort should start now and continue until the end of the project.</p>	<p>The diversity in workers’ identities was recognized as a challenge during the three focus group discussions with private sector actors and one focus group discussion with workers. Reviewing the project documents, the facilitator was not able to identify how the project is considering ethnicity to better engage key stakeholders in the communication strategy and better engage workers during the training sessions.</p>
<p><b>Monitoring and Evaluation:</b> SENDEROS should set, in one month, the remaining performance indicator targets under Outcome 1, define the tasks required to achieve those targets, and incorporate them in the workplan. These changes should be reflected in the CMEP and sustainability plan and communicated to USDOL.</p>	<p>By reviewing the CMEP and the TPRs, the facilitator was able to identify that there are three output indicator targets under Outcome 1 that were not yet defined at the time of this assessment. Setting the targets is key to finalizing the indicator in the CMEP allowing the project to monitor and report progress to USDOL.</p>