



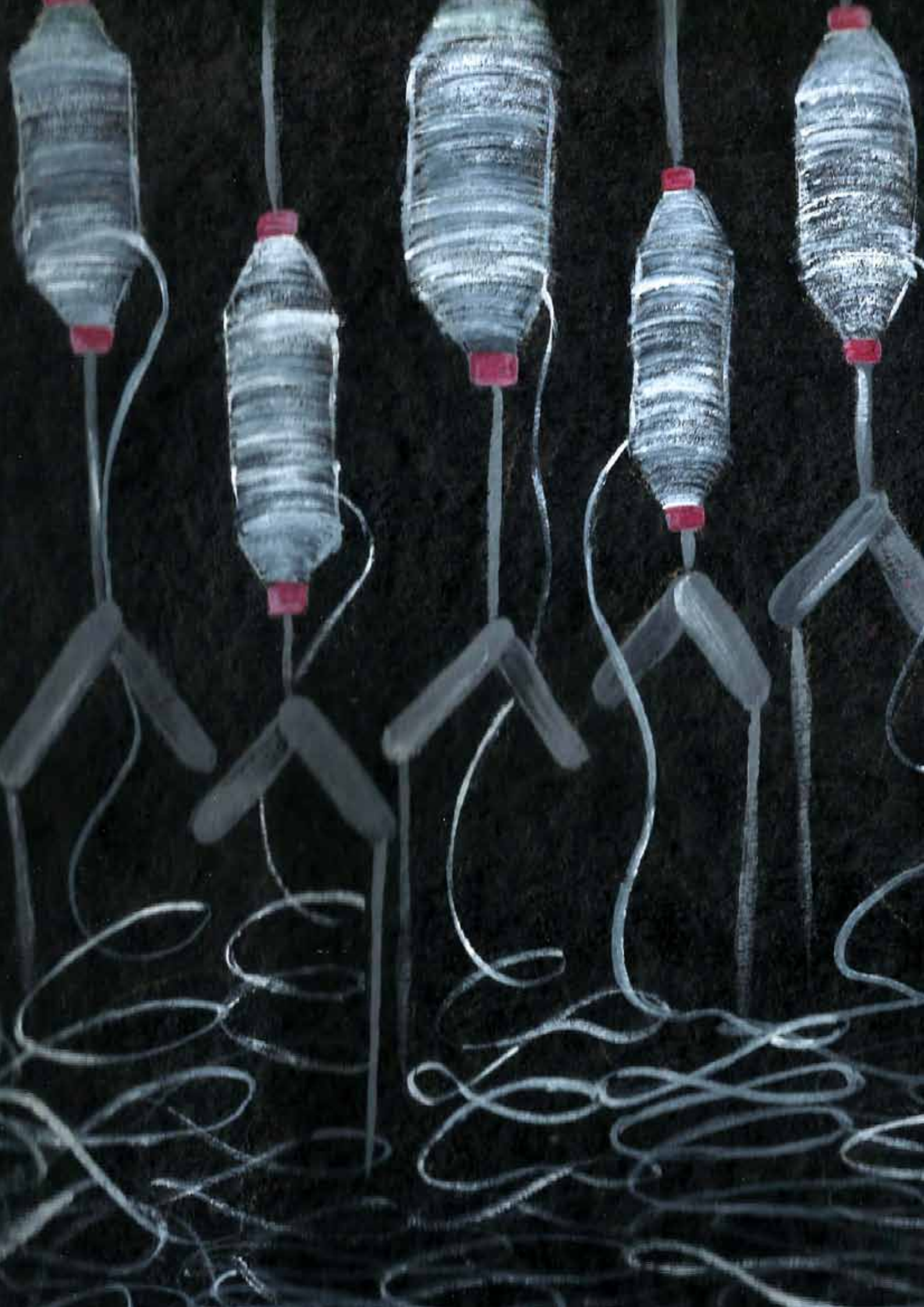
Evaluation of Sumangali

Eradication of extremely exploitative working conditions in southern India's textile industry

June 2019

Kaarak Enterprise Development Services Private Limited





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Abbreviations

AIADMK	All India Anna Dravida Munnetra Kazhagam
ASK	Association for Stimulating Know how
BMZ	German Ministry of Economic Cooperation and Development
BSI	British Standards Institution
CARE-T	Community Awareness Research Education Trust
CSO	Civil Society Organization
CYC	Child and Youth Centre
DAC	Development Assistance Committee
DeGEval	German Evaluation Society
ETI	Ethical Trade Initiative
FGD	Focus Group Discussion
FWF	Fair Wear Foundation
GTA	Partnership for Sustainable Textiles or German Textile Alliance
HOPE CRST	HOPE Child Rights Support Team
ICC	Internal Complaints Committee
IDI	In depth interview
INR	Indian Rupee
KII	Key informant interview
MBC	Most Backward Class
MoU	Memorandum of Understanding
MSI	Multi Stakeholder Initiative
NGO	Non Governmental Organisation
NIMHANS	National Institute of Mental Health and Neurosciences
NLSIU	National Law School of India University
OECD	Organisation for Economic Cooperation and Development
PAN	Permanent Account Number

PIL	Public Interest Litigation
PRI	Panchayati Raj Institution
READ Foundation	Rural Education and Development Foundation
READ	Rights Education and Development
ROSE	Rural Organisation for Social Education
ROWCL	Reduction of Worst forms of Child Labour in Textile Supply Chains project
RRC	Regional Rehabilitation Centre
SCPCR	State Commission for Protection of Child Rights
SCW	State Commission for Women
SEW Project	Sumangali – Eradication of Extremely Exploitative Working Conditions in Southern India's Textile Industry Project
SHG	Self help group
SIMA	Southern India Mills' Association
SIMCODESS	Sirumalai Evergreen Multipurpose Community Development Society
TASMA	Tamil Nadu Spinning Mills Association
tdh	terre des hommes Germany India Programme
TEA	Tirupur Exporter Association
TEST	Trust for Education And Social Transformation
TN	Tamil Nadu
TNA	Tamil Nadu Alliance
TNMSP	Tamil Nadu Multi Stakeholder Programme
TOC	Theory of Change
TPF	Tirupur People's Forum
USD	United States Dollar

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Evaluation Team, Kaarak

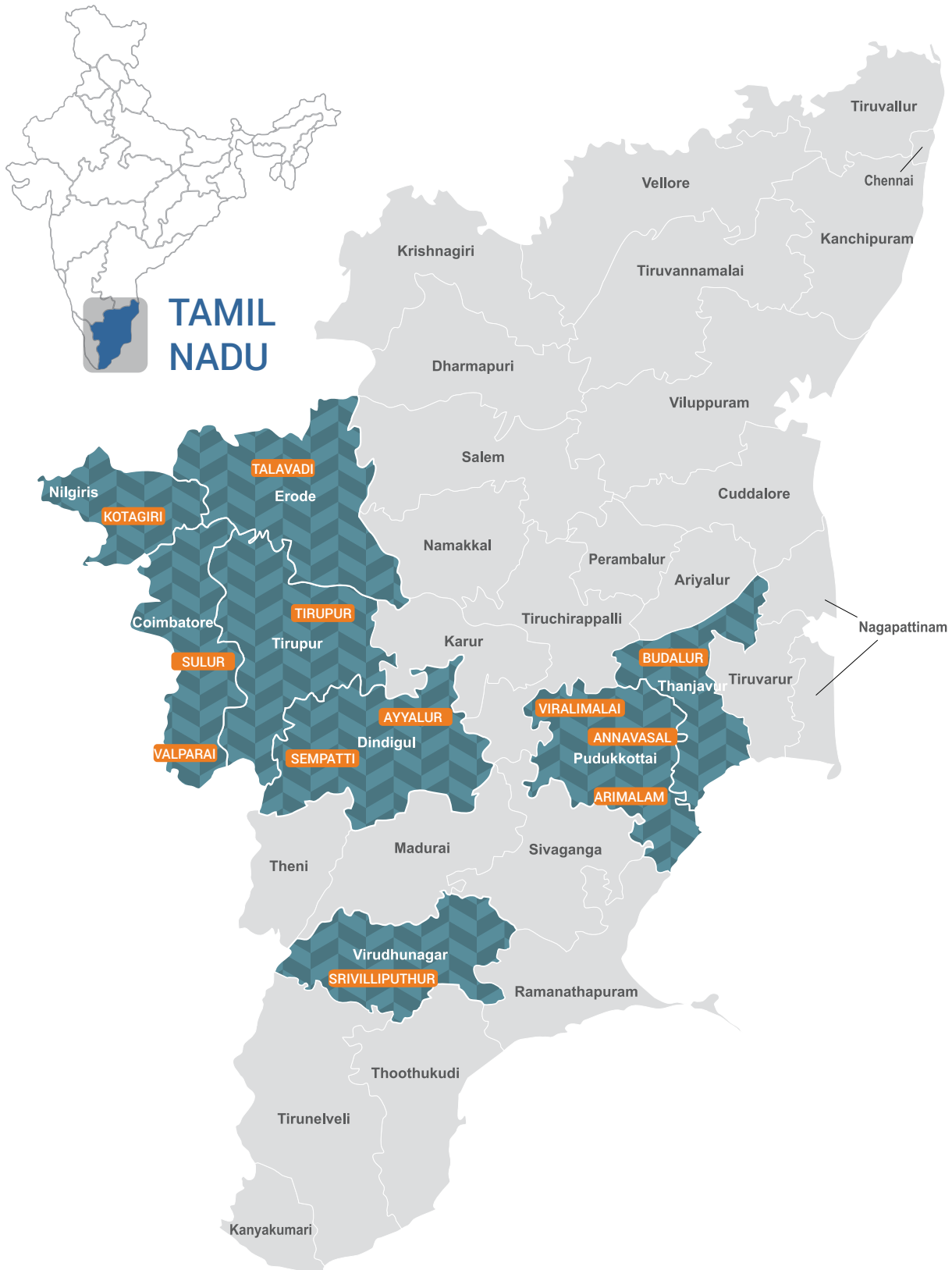
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Project Area Map



Executive Summary

“Sumangali – Eradication of Extremely Exploitative Working Conditions in Southern India’s Textile Industry” is a project supported by the German Ministry of Economic Cooperation and Development (BMZ) and C&A Foundation. This four-year project (April 2016–Dec 2019) is being implemented in 12 blocks of eight districts of the state of Tamil Nadu by terre des homes Germany – India Program (tdh) and Community Awareness Research Education Trust (CARE-T), a Coimbatore based NGO.

The total budget of the project is € 2,045,056. The project has the following four sub-goals at three levels of intervention:

Level	Sub goals
Micro	1. Rehabilitation of 24,000 girls and young women as survivors of the Sumangali scheme in 12 blocks of Tamil Nadu 2. Prevention of recruitment of girls and young women under the Sumangali scheme in 12 direct blocks and 48 extended blocks
Meso	3. Development and implementation of a universal code of conduct and recruitment guidelines by associations of spinning mills and exporters of garment manufacturers through multi-stakeholder dialogue process with support of German Textile Alliance
Macro	4. Discussion of a draft bill (recruitment law) for the termination of the Sumangali scheme in Tamil Nadu State Assembly.

The project commissioned the end-term evaluation as part of its accountability mandate and as a learning exercise to understand and inform pathways to eradicate the Sumangali¹ system. The evaluation was conducted from mid-January 2019 to April 2019 and followed a qualitative and participative approach. The methodology included desk review, an evaluation workshop with project team, field visits involving discussions with beneficiaries and project team, and key informant interviews with other external stakeholders and experts. The evaluation also reconstructed project’s theory of change and developed a rating system for evaluation purposes. The evaluation used OECD-DAC criteria of assessing relevance, validity of design, effectiveness, efficiency, results and sustainability.

1. Sumangali in Tamil is “a happily married woman”. The employers used this term and scheme to attract young girls and women from vulnerable families under the connotation of a marriage assistance system.

The key findings of the evaluation are as follows:

Relevance

The overall objective of eradicating Sumangali system in Tamil Nadu's textile industry is highly relevant to the development context of the project area. At the micro level, economic rehabilitation is fully aligned to the needs of the Sumangali survivors as all of them are from economically deprived families. Since the need assessment exercise did not capture physical and mental health needs of the identified Sumangali survivors, the relevance of providing psychosocial support and medical care to all the beneficiaries cannot be established. The project's objective of preventing girls and women from joining the Sumangali system through awareness creation is partly relevant as it does not address the systemic issues fully.

At the meso level, the proposed universal code of conduct to define minimum standards for employment in textile sector is highly relevant as a large number of factories remain outside the purview of existing codes and guidelines. The proposed anti-Sumangali law is relevant as it aims to fill a legal loophole in the existing laws, which allows the textile units to employ adolescents in the age group of 14 – 17 years. However, considering the complexity and long process of formulating a new law, the design could have explored policy advocacy alternatives. These alternatives include evidence based advocacy for better enforcement of existing laws and judicial mechanisms like 'public interest litigation' to challenge the legal loopholes.

The project directly contributes to the development agenda and strategic result areas of BMZ and C&A Foundation and the objectives are fully aligned to core mandate of implementing partners.

Validity of project design

The project design is weak in terms of logical connect between the levels of results (i.e. the connect between outputs, outcomes and overall goal). The micro level sub-goal 1 of rehabilitation is target driven and did not consider a holistic approach of providing rehabilitation services to all the beneficiaries to bring long-term changes in their lives. Holistic rehabilitation entails a need-based approach to provide services from counselling to education or vocational training. The evaluation of pilot phase (ROWCL project) had also recommended this approach, "designing a second phase, the holistic approach needs to be maintained with counselling and rehabilitation as core elements to prepare girls and young women for further education or vocational training". The significant difference between targets for psychosocial support (18,000), and vocational training (6,600) and education (2,440) shows that the design did not adopt holistic approach for all the beneficiaries.

Under sub-goal 2, the project targeted to stop recruitment under Sumangali scheme in all the 12 project blocks completely, however, the strategy and corresponding activities are inadequate to comprehensively cover the entire project area. The prevention strategy focused on filling the information gap related to negative impacts of the Sumangali system and overlooked other systemic issues like safety concerns for girls in the villages, economic deprivation, social norms. Further, the operational strategy to organise survivors and stakeholders into groups is not clear. There is an absence of interrelatedness between the different activities, which makes it ambiguous as to how the overall objective of eradicating the Sumangali scheme in the entire block shall be achieved.

To develop the recruitment guidelines under sub-goal 3, the project design rightly suggested of a multi-stakeholder approach. However, the design made assumptions about participation of different stakeholders and did not identify challenges and risks of the dialogue process adequately. The project design to draft the new law under sub-goal 4 is not stakeholder driven and is inadequate to having the law discussed in the Tamil Nadu State Assembly.

Further, the design did not consider the interconnectedness of different sub-goals. For instance, the needs assessment data gathered under sub-goal 1 should have been used as evidence for policy advocacy under sub-goal 3 and 4. The project also lacked an overall media strategy, an important component of policy advocacy work.

Overall, the project design is inadequate to achieve the four sub-goals and the overall goal of the project.

Effectiveness and results

The project achieved outcome level results only at the micro level. At the meso level, the recruitment guidelines are drafted, however, it is yet to be introduced to employer associations. At the macro level, the proposed anti-Sumangali law is yet to be drafted. The key findings related to effectiveness and results are as below:

Reduction of girls and women being recruited under the Sumangali system

The key outcome of this project is a reduction in the number of girls and young women joining the Sumangali system from the project area. Although there is no project level data to validate this result, communities and the NGO partners cited proxy indicators to report that the numbers are significant. The proxy indicators include difficulty in identifying new cases of Sumangali survivors in the project area; reduction in number of vans plying in the project area to transport the women workers. This outcome is partly attributed to the project activities such as trained survivors and community representatives and the NGO partners employing informal methods and persuasive techniques to stop families from sending the girls to factories under the Sumangali system. The village level awareness programmes made the girls and their caregivers aware of the deception and harsh working and living conditions in the factories. The results of the rehabilitation strategy also contributed to this sub-goal, as the rehabilitated survivors became role models for other girls and young women in the villages. The project offering financial support for skilling and reintegration to education also motivated girls to quit or not return to factories after their holidays.

Despite these efforts, the project has not achieved complete prevention of recruitment under Sumangali scheme in the project area, as systemic issues of Sumangali system still persist and many villages are not fully covered. Factories have changed their recruitment



strategies in response to several initiatives against the Sumangali system without any significant change in wage or working conditions. The textile industry is increasingly recruiting inter-state migrant workers, both males and females, from the northern states like Odisha, Jharkhand. In some cases, the factories are also recruiting female workers from other neighbouring blocks and districts. Due to financial vulnerabilities and lack of jobs in local economy, the families are forced to send girls to the factories. Relevant government officials still do not take proactive measures to prosecute violators, and the social norms related to gender, caste, etc. that perpetuate this system still exist.

Enhanced life skills of beneficiaries who attended the programme in a holistic manner

The project successfully identified 35,422 survivors against a target of 24,000. The process was effective in building life skills of beneficiaries who used the services of Regional Resource Centres (RRC) for a longer duration. The RRCs as safe spaces for beneficiaries were able to provide appropriate environment for this capacity building in an efficient manner. Since, the need assessment exercise did not capture information on mental and physical health status, the effectiveness of psychosocial support on emotional well being of the survivors cannot be established.

Rehabilitation of girls in alternate livelihoods and in education system

So far, the project trained 4,250 survivors in alternate livelihoods against a target of 6,600 of which 2,039 survivors have started earning. Also, the project successfully reintegrated 1,246 Sumangali girls into education system against a target of 2,440. Evaluation team met some of these beneficiaries during site visits and many reported the rehabilitation process to be a life-changing experience. The rehabilitated survivors that the evaluation team met with are confident, satisfied and feel empowered to take decisions about their lives. Parents are proud of their daughters and expressed their gratitude towards the project for rebuilding their daughters' lives. Efficient functioning of RRCs to provide psychosocial and life-skill support and RRC staff's continuous mentoring was instrumental in achieving these results. The financial support also played a critical role as the project supported beneficiaries in paying the fee for vocational training courses and travel costs between their homes and the vocational training centres.

However, the project did not achieve the critical indicator for provision of better jobs, i.e. a minimum income of INR 300 per day as committed in the proposal. The data suggests that only 23% of the 347 survivors who have started earning in alternate livelihoods have daily incomes more than INR 300. Also, most of the girls are employed or self-employed in informal employment. Further, none of the survivors in employment have contract letters; many get paid less than minimum wages and have long working hours. The project's experience suggests that local economy cannot offer decent jobs to a large number of women. Accordingly, selection of trade under the rehabilitation strategy needs to consider feasibility of the trades to provide decent work. This also shows that the systemic issues in the textile industry need to be addressed so that the industry provides decent work to women of more than 18 years in large numbers.

Successful case investigations led to release of pending claims

The project reported 139 extra-judicial successful case investigations in three districts for recovery of payments from the factories related to accidental deaths, accidents and withheld provident fund amounts. Participation in public hearing organised by State Women's Commission in 2018 was effective as it resulted into resolution of 9 out of 25 cases.

Draft recruitment guideline for textile industry is prepared and the draft bill document is still under preparation

The project collaborated with National Law School of India University (NLSIU) to develop the recruitment guideline and its abridged version 'Mill Codex' for textile industry. The draft guidelines include feedback of experts and trade unions. However, the document does not include feedback of employers' associations yet. The drafting process was technically sound, however, has not engaged with employer organisations, the key stakeholders. Southern Indian Mills Association (SIMA) launched its revised version of guidelines in December 2018, which is significant contextual change with regard to this sub-goal. Consequently, the project will need to reformulate its strategy and respond to this critical development. The project extended its partnership with NLSIU to draft the anti-Sumangali law, which is delayed significantly and is still in its preparatory phase. The process followed for the strategies at the meso and macro level suggests that a more intensive engagement and diverse skill sets are

required to facilitate multi-stakeholder processes.

Efficiency

The project had a multi-tiered project management structure, which was effective in setting up RRCs and project team on time, timely submission of biannual reports, efficient team management and in overall financial management of the project. The project team comprises of experienced and capable human and child rights activists with an in-depth understanding of the subject matter. However, capacity improvements are required in areas related to technical understanding of psychosocial support, tracking and reporting of results and policy advocacy with multi-stakeholder approach. The capacity enhancement can be achieved by including relevant professionals in the project team or by collaborating with specialised agencies.

Most of the micro-level activities under sub-goal 1 were completed in a timely manner although there are significant delays in activities planned at meso and macro levels. Further, there is significant misinterpretation of targets related to activities under sub-goal 2. Considering the progress made so far, it is unlikely that the committed results will be achieved within the project period. The project did not report any challenge related to fund flow or human resource management.

The areas of improvement include rationalisation of targets, development of standardised processes for psychosocial support and block level prevention work; monitoring of quality of processes, simple and uniform database management system; and adaptive management. A higher level of technical support is required at the meso and macro levels to achieve the intended objectives effectively and efficiently.

Considering the results achieved and the amount invested, the project performance is satisfactory for micro level interventions. Since the project made long-term impact on the lives of beneficiaries and achieved in stopping significant number of girls from entering the Sumangali system, the overall value for money is satisfactory. While the modest costing for personnel and activities works in favour of cost efficiency, it also limits partners' ability to employ personnel with required technical skills, such as counsellors having necessary qualifications and experience. Overall, the returns are modest if the results are seen from the perspective of addressing the systemic issues of the Sumangali system.

Sustainability

The sustainability of project results varies by level of intervention. At the community level, long term positive changes in confidence, self esteem, education and vocational skill are visible for beneficiaries of rehabilitation services. Enhanced capability to earn a livelihood close to home is the most significant satisfying factor for majority of the survivors and their families. As a result of this, the survivors often overlook the absence of worker rights in their current employment like minimum wage, overtime, working hours, leaves etc. Further, the survivors are unaware of the labour rights and compare their current employment only with the overall exploitative working conditions in the textile factories. These beneficiaries and their families show a good potential of being ambassadors of anti-Sumangali message. However, the ripple effect of the project cannot be established since opportunities and incentives of the project to other Sumangali survivors will not be available after the project period.

The dependency level of community level groups and stakeholders on project staff is high and these structures are not likely to last after the project period. More importantly, the capacity of these groups to raise their voice, report violations and demand rights is absent. The results at the meso and macro level target systemic and structural changes, however, it is unlikely that they will be achieved during the project period. An unintended sustainable outcome of the project is the enhanced capacities of the partners to work towards eradicating exploitative working conditions. The implementing partners have developed a better understanding of risks and challenges; have enhanced capacity to work with government officials at the block and district levels; and, knows the importance of non-judicial mechanisms to seek redressal of workers' issues related to accidents and exploitation at the workplace. The project experience has also enhanced partners' capacities to build rapport with community and devise local strategies to prevent girls from entering Sumangali system.

SCALABILITY AND REPLICABILITY

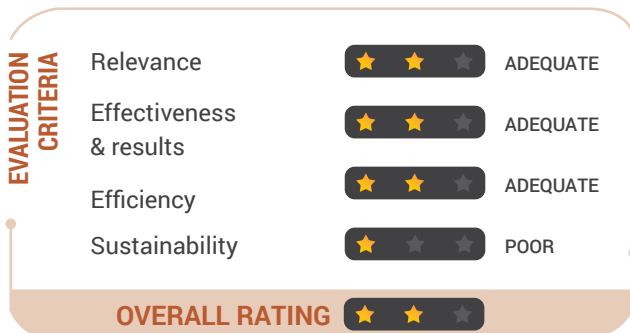
Amongst all the project strategies, the holistic approach to rehabilitation through RRC has a potential for replication and scalability after incorporating process related improvements. The comprehensive package can be formulated for a period of six months to one year, comprising of the components identification, need assessment, mentoring, life skills training, vocational

training or educational reintegration and employment. In order to further develop the model, the project will have to standardise the processes and their quality standards.

OVERALL PERFORMANCE OF THE PROJECT

The project is relevant to the development context and needs of the beneficiaries; however, the design is inadequate. The project was effective in reducing the number of girls entering the Sumangali system, however, the systemic issues persist. The project successfully rehabilitated 2,039 victims in alternate livelihoods and 1,246 in education, however, only 23% are earning more than INR 300 per day. The overall value of money is good at the micro level, however, overall returns are modest against addressing the systemic issues. The sustainable impact of the project is enhanced capacities of victims and partners, however, the other community and policy level impact is not sustainable.

The overall performance of the project is Adequate.



Emerging lessons

- Effective rehabilitation of Sumangali survivors requires a longer-term systematic support with holistic approach. Standardised processes and technically validated tools are required to provide rehabilitation services in effective and efficient manner.
- Provisioning of decent jobs, as alternate livelihood strategies require trade selection based on sound feasibility studies. Such studies should assess the potential trades for women on wage levels, working conditions and status of labour rights.
- The prevention related activities at the community level should be complemented with intervention at the factory level for improved recruitment and working conditions.
- Multi-stakeholder dialogue process requires significant investment in relationship building and lobbying from the initial stages to ensure buy-in of and consensus amongst all the key stakeholders.
- Usage of the term 'Sumangali' is not strategic because it represents only one of the many unfair recruitment and employment practices. Moreover, Sumangali system is not recognised in policy circles, which makes any dialogue with government and employers difficult.



Recommendations

RECOMMENDATION FOR BMZ AND C&A FOUNDATION

1. Building upon the project experience, the donors should support the partners to develop a comprehensive package for need based holistic rehabilitation services. At the same time more focus should be given to complementary prevention strategies targeting recruitment practices and working conditions in factories. Need based holistic rehabilitation services is explained in the following sub-section, i.e. recommendation for tdh & CARE-T.
2. Facilitate synergy among partners of this project as well as among other partners like Freedom Fund and Partnership for Sustainable Textiles for mutual learning and support towards common goals.
3. Considering the investment made in developing the Mill Codex, the partner can be funded further to work towards ensuring its acceptance and use.
4. A feasibility study to improve working and living conditions of migrant workers in the south India's textile industry must be taken up to inform future scope and objectives of the project.
5. The next phase of support should be considered as extremely exploitative working conditions are still prevalent in the Tamil Nadu's textile industry. The next phase should capitalise on achievements and lessons of this phase with focus on systemic factors that lead to extremely exploitative conditions. The next phase should be approved after a sound review of project strategies and targets.
6. The project must have the provision for baseline and endline studies as part of the design to generate evidences on a wider scale to validate impact of the programme. The theory of change approach should be considered while formulating the new project with focus on results logic and a sound analysis of why a particular strategy is likely to work.
7. In order to address systemic issues, it is important to engage with employers in a strategic manner. This strategy formulation should be stakeholder driven and must include consultations with employer associations in the design phase. Any initiative must consider multiple alternatives according to the context and interest levels of the employers. Few indicative strategies to incentivise the employers are:
 - a. Supporting employers through their associations to address their key challenge related to labour shortage. In this direction, partnership with government or private skill development institutions along with employer associations can be established to ensure a regular supply of skilled and semi-skilled workers in the textile industry. This can be beneficial for the employers, as it would save their recruitment and training costs. For workers, it can pave a way for formalisation of the recruitment process leading to decent work. Partnership with Skill India and Sector Skills Council for Textile industry should be explored. In the private sector, partnerships with skill development organisations like Team Lease should be explored.
 - b. Another entry point to engage with employers can be through productivity enhancement model at the factory level to promote social dialogue. An example in this regard is the International Labour Organisation's (ILO) Sustaining Competitive and Responsible Enterprises (SCORE) programme for productivity enhancement along with improving working conditions.
 - c. Supporting employers to implement the existing laws in their factories can be another strategy. An example of this strategy is Ethical Trade Initiative's project on setting up Internal Complaints Committees (ICC) in the factories.
8. Freedom of association and collective bargaining is imperative to eradicate exploitative conditions and to promote decent work. Hence, collectivization of all categories of workers in textile industry is critical. The initiative can provide technical support to traditional or new age trade unions in expanding their membership in Tamil Nadu's textile industry. A scoping study is required to understand the current situation with regard to status of worker organisations and to design any future initiative. The scoping study must consult trade unions from both the categories, i.e. traditional and new age, to assess the feasibility of the intervention strategy.

RECOMMENDATION FOR tdh AND CARE-T

The recommendations for tdh and CARE-T, the implementing organisations, is focused on improving the effectiveness and efficiency and is accordingly categorised as per the project strategies:

1. **Rehabilitation strategy:** The project should aim to develop a comprehensive rehabilitation strategy to provide quality rehabilitation services in a need based and holistic manner. Some of the specific recommendations are:
 - i. Rehabilitation service must follow case management approach wherein the support services are provided as per the identified needs of the survivors.
 - ii. The current need assessment tool must be revised to assess physical and mental health status of survivors at the time of identification. Relevant technical experts must approve the need assessment tool before its application.
 - iii. The project should adopt life skill building approach, instead of psychosocial counselling, as it is more relevant to the beneficiaries and is also within the delivery capacities of the field team. The life skills module can be delivered on a weekly basis over four to six months. The project should consider a need-based approach to assess if the life skills training and vocational training can be delivered simultaneously or one after the other. Appropriate tools should be developed and applied to measure the progress of the beneficiaries. The tools must essentially include trainer manual to conduct life skill trainings.
 - iv. Survivors who require clinical attention for mental health should be referred to professionals such as clinical psychologists and psychiatrists. Innovative and cost-efficient methods such as phone-based therapy can be explored for this purpose.
 - v. Selection of trades for alternate livelihood should be based on block level feasibility studies. The feasibility studies must focus on identifying trades and vocational skills based on market demand, their absorption potential, salary levels and ability to provide decent working conditions. The project's placement support must ensure issuance of contract letters detailing terms of employment and benefits.
 - vi. Adopting a centralised web-based information system to manage opportunities can strengthen the project's placement strategy. Further, partnership with local placement agencies can be explored. Since employers pay placement agencies for recruitment services, this strategy can be significantly cost effective. Finally, the project team at the RRC level should be given flexibility to innovate and implement strategies to facilitate placement of survivors.
2. **Prevention strategy:** The prevention strategy must focus on addressing systemic issues at the individual, family, societal and workplace levels to eradicate exploitative conditions in the textile industry.
 - i. The prevention strategy should continue to work on filling the information gap related to negative impact of the Sumangali system. Additionally, awareness must be created on labour rights especially on minimum wages, leaves, freedom of movement, anti sexual harassment laws, and need for collectivisation.
 - ii. The current strategy to promote two kinds of groups needs to be revisited to ensure coverage of all the villages, promotion of women and youth leadership, and a linkage with block level group using federation structure. The capacity development of the groups must focus on eradication of social norms, labour rights, and participation in decentralised self-governance mechanisms and also in policy advocacy initiatives at the meso and macro levels. The project must work out sustainability strategy of the groups in consultation with survivors and other key stakeholders.
 - iii. The prevention strategy must include engagement with factories to improve working conditions and implementation of existing laws. The engagement strategy needs to be explored in which some of the good practices can be taken into consideration.
 - iv. The project can also advocate for setting up of Gram Panchayat level systems to prevent unsafe migration and also to raise voice against the exploitative conditions. One of the examples is to support Gram Panchayats in maintaining migration registers.

- 3. Development of Mill Codex:** The project must initiate engagement with employer associations like SIMA at the earliest with the overall goal of developing universal code of recruitment in a stakeholder driven manner.
- i. The project needs to develop human resource capacities to engage with employer associations to facilitate multi-stakeholder dialogue process either by bringing in new experts or by tdh playing a bigger role at this level.
 - ii. With the objective of building trust, the project should also identify and disseminate good practices of recruitment and working conditions.
 - iii. The project must use existing platforms like Tamil Nadu Alliance (TNA) and Multi Stakeholder Initiative –Tamil Nadu (MSI-TN), and engage with worker organisations to create larger demand for the universal Mill Codex.
- 4. Policy advocacy at the macro level:** The project should explore alternate methods of policy advocacy to address the legal loopholes in place formulating a new law, which is a long-term and resource intensive strategy. Few alternatives to be considered are:
- i. Advocacy for inclusion of textile industry (including spinning mills) in the list of hazardous industry through public interest litigation
 - ii. Adopt evidence based policy advocacy at the local, regional and state levels to highlight the exploitative working conditions in the textile industry. The project can utilise need assessment survey data and further collect relevant data using TPF's network of community organisations.
 - iii. Advocate for activating District Monitoring Committee and implementation of its recommendations in partnership with other stakeholders like TNA.
 - iv. Support the TNA's efforts to develop policy for women workers in textile industry government bodies. It is to be noted that TNA is working with State Commission for Women and Department of Labour to develop this policy. TPF can offer support by creating grassroot level demand for such a policy. It can further influence the state level policy makers by providing evidence in the form of data and field stories to highlight the situation of women workers.
 - v. Design and implement a communications and media strategy to deliver the key messages for different stakeholders including local media in a sustained and consistent manner.
- 5. Project management:** The project management systems must focus on developing appropriate tools for efficient monitoring to facilitate internal learning, adaptive management and enhancing the effectiveness of the implementation strategies. The recommendations in this direction are:
- i. The project should develop a manual for the project team to develop common understanding of the objectives, strategies, terminologies, processes, quality control measures, indicators and targets. This shall also contribute to standardisation of activities across blocks.
 - ii. The project must develop systems to validate the results (numbers) reported by the blocks. Further, the project must record the number for outcome level results, for e.g. number of girls prevented from joining.
 - iii. The project must develop web-based common database management system for standardised and credible monitoring and reporting. The project can use services of technical service providers, readily available at the local level.
 - iv. The project must formalise the feedback mechanism as part of the monitoring system and develop follow up mechanism to monitor the status of feedback provided.
 - v. Better remuneration structure for project staff should be considered to enable the partners to hire staff with required capacity and skills.
 - vi. The project must include discussion on contextual changes and devise project's response and future strategy. The quarterly and bi-annual meetings must also include discussion on good practices and their replication status.

ONE.

Introduction

Context analysis

According to the Global Slavery Index, India had around 8 million people living in modern slavery on any given day in 2016.² Modern slavery forms include forced labour, bonded labour and child labour, which is prevalent across sectors including textiles and garments. The Indian textile industry majorly concentrated in the southern state of Tamil Nadu employs higher proportion of girls and young women and is infamous for modern slavery.

The textile industry in Tamil Nadu largely includes spinning mills, garments manufacturing units and highly decentralized power looms. The industry witnessed a phenomenal growth in the last three decades due to favourable policy changes like abolition of licensing system for textile mills, removal of entry barriers for large enterprises which were earlier reserved for small scale enterprises and relaxation of apprenticeship period from six months to three years. The industry also benefited

from economic liberalization in India and is now part of the global supply chain supplying to most of the leading clothing brands in the world.

According to the recently launched 'Tamil Nadu New Integrated Textile Policy 2019', the state accounts for 19 percent of India's textile output, a 5 percent point increase since 2015. It is the largest economic activity after agriculture, providing direct employment to around 3 million people.³ In 2018, the industry accounted for approximately USD 7.14 billion (as per the average conversion rate) in exports, which is one-third of the country's textile business. Tamil Nadu houses more than 3/5th of the 3,376 spinning mills in India providing employment to 280,000 persons.⁴

Tirupur, part of the project area, is the biggest knitting cluster in India with more than 6,000 units. A major exports hub, the cluster accounts for 45% of total knitwear exports and generates gainful employment for 600,000 persons directly. Besides domestic turnover of USD1.4 billion per annum, Tirupur currently undertakes exports of over USD36 billion. Further, there are 563,000 registered power looms in the state, which is around one-fourth of the power looms in the country employing 1.019 million.⁵

The textile industry initiated systemic measures to replace permanent male workforce with temporary female workforce in late 1990s through various schemes under the garb of apprenticeship. Consequently, majority of the workers are girls and young women employed under the Sumangali scheme and /or 'camp labour' scheme.

Sumangali, a Tamil word meaning a happily married woman, was introduced in the textile industry to attract adolescent girls from poor families to work in the factories under the ruse of a marriage assistance system. Adolescent girls were offered employment along with accommodation in 'protected environment', i.e. girls' hostel located inside the factory premises. They earn monthly stipend along with a lump-sum amount at the end of their three-year employment. This was perceived as a way for young girls to earn their own dowry for marriage and lower the financial burden on their parents. The scheme, even though with attractive terms for poor families, turned out to be a deceptive and exploitative one due to restriction of movement, long working hours, payments below minimum wages, no payments for overtime, health risks. etc.

Sumangali scheme in its practical form became a combination of child labour, forced labour and bonded labour.

Source: Solidaridad. (2012). Understanding the Characteristics of the Sumangali Scheme in Tamil Nadu Textile & Garment Industry and Supply Chain Linkages.

2. <https://www.globallslaveryindex.org/2018/findings/country-studies/india/>

3. Handlooms, Handicrafts, Textiles & Khadi Department, Government of Tamil Nadu. (2019). *Tamil Nadu New Integrated Textile Policy 2019*. Retrieved from http://cms.tn.gov.in/sites/default/files/documents/TN_Textile_Policy_2019.pdf

4,5. Ibid



According to the report 'Fabric of Slavery 2016' by India Committee of Netherland (ICN), forced labour conditions existed in 91 percent of the spinning mills, with Sumangali scheme present in 47 percent of the mills and camp labour in 53 percent of them.

Under this scheme, the workers live in company-managed hostels with limited freedom of movement and are available to work on call without the freedom to leave the company.

After receiving considerable attention from civil society organisations and national and international media, several initiatives were started in the region. These initiatives made an impact on the practices of the factories that are directly supplying to large clothing brands. However, the Sumangali and other similar systems remained prevalent in spinning mills, who are outside the purview of social audits of international brands.⁶ It is reported that even in garment factories and vertically integrated firms, other similar fixed term arrangements are widespread.⁷

Research studies suggest that at the time of this project's initiation the Sumangali system was significantly prevalent. According to the report 'Fabric of Slavery 2016' by India Committee of Netherland (ICN), forced labour conditions existed in 91 percent of the spinning mills, with the Sumangali scheme present in 47 percent of the mills and camp labour in 53 percent of them. The same report also estimated that in the last ten years there was one hundred percent reduction in number of spinning mills recruiting workers under the Sumangali system. CARE-T, the project holder, estimated 2,60,000 girls and women employed under Sumangali scheme in 2015 as mentioned

in the proposal document. Another study conducted in 2014 by ASK and Freedom Fund estimated this number to a total of 1,00,000 girls and young women.⁸ However, government denies the existence of Sumangali scheme in textile units.

In the last decade, the textile industry has started employing inter-state migrant workers, both males and females from poorer northern states like Jharkhand, Bihar, Assam and Odisha. The employers' associations are also signing MoUs with the state governments of these states for skilled workforce. The industry complains of huge labour shortage and notes that local population prefer less arduous jobs. The labour shortage is also attributed to late entry of women and men into labour force due to state government's initiative to provide free education up to grade 12th. The migrant workforce comprises of workers who stay alone in the hostels as well as with the families and in settlements near the factories. Some of the experts during evaluation opined that the textile industry is replacing local workers with inter-state migrant workers in a systematic and consistent manner. These experts estimate the current inter-state migrant workforce to be around 25 percent to 40 percent of the total workforce. They forecast that in next five years the entire workforce would be of inter-state migrants.

During the project period, the government of India ratified two core ILO conventions in 2017, namely No. 138 on

6. Fair Wear Foundation. (March 2015). *FWF Guidance for Members: The Sumangali Scheme and India's Bonded Labour System*. Retrieved from https://www.fairwear.org/wp-content/uploads/2011/12/Sumangali_update_2015_2017-changes.pdf

7. Delaney, A. & Connor. T. (2016). *Forced Labour in the Textile and Garment Sector in Tamil Nadu, South India: Strategies for Redress*. Retrieved from <http://www.indianet.nl/pdf/ForcedLabourTextileGarment.pdf>

8. Addressing modern slavery in Tamil Nadu textile industry-Feasibility study report, the Freedom Fund and Association for Stimulating Know How (ASK), 2014

Minimum Age to Employment and No. 182 on the Worst Forms of Child Labour. The ratification was preceded by an amendment in 2016 of the Child Labour (Prohibition and Regulation) Act 1986. The 2016 amendment specified a list of hazardous industries where children below 18 years of age cannot be employed. The textile industry is not in the list of hazardous industry in Tamil Nadu, therefore allowed to employ workers from the age of 14 years. This is the biggest legal loophole and one of the root causes for existence of Sumangali system. Tamil Nadu government passed a significant legislation, 'Tamil Nadu Home and Hostel Act for Women and Children (Regulation) Act 2014', which lays down norms for safety and security of hostel inmates and is highly relevant to the workers employed under Sumangali system. However, reports indicate significant gaps in the implementation of this act.

Discussions with experts during evaluation reveal that non-payment of minimum wages, harsh working and living conditions, poor enforcement of existing laws, high vulnerability of inter-state migrant workers and unorganised workforce are the key issues of the Tamil Nadu's textile industry that perpetuate forced labour conditions. Experts mention that the workforce in Tamil Nadu is typically characterized by their unassertive

obedience, silent and afraid to report violations. Worker led protests are uncommon, even at the time of extreme incidents like death or accidents. The traditional trade unions' presence among the majority of workforce is insignificant as their membership is limited to permanent workers and only those who are above 18 years of age.

OTHER KEY STAKEHOLDERS

Some of the other organisations working in the region for addressing the unfair recruitment and employment practices are Ethical Trade Initiatives (ETI), Freedom Fund with support from C&A Foundation, Fair Wear Foundation (FWF) and Partnership for Sustainable Textiles (also known as German Textile Alliance (GTA) or textile buendnis)⁹.

Southern India Mills' Association (SIMA) and Tamil Nadu Spinning Mills Association (TASMA) are two leading associations of spinning mills while Tirupur Exporter Association (TEA) is the leading association of garment manufacturers. Coimbatore District Textile Workers Union, formed before India's independence, is the oldest trade union in Tirupur and is affiliated to Hind Mazdoor Sabha, a central trade union.

Recent initiatives in the Tamil Nadu to improve the condition of workers

- ▶ ETI's Tamil Nadu Multi-Stakeholder Programme (TNMSP) started in 2012. It works with local organisations to create worker groups in mills, generate awareness amongst the communities in eight districts, provide counselling to women workers and create conducive environment for the female workers within the units.
- ▶ The GTA in partnership with SAVE, a local NGO, is implementing Multi-Stakeholder Initiative Tamil Nadu (MSI-TN) since 2014. The project aims to establish a social dialogue mechanism between the key stakeholders, including government and the spinning mills.
- ▶ Freedom Fund's hotspot initiative with support of C&A Foundation is operational since 2015. The initiative is being implemented in collaboration with 14 local NGOs in 405 villages. The project also initiated the Tamil Nadu Alliance (TNA) in March 2017 as a coalition of civil society network organizations.
- ▶ FWF has Workplace Education Programme since 2017 that aims to improve working conditions at suppliers of FWF affiliates through training of workers and supervisors.
- ▶ Thomas Reuters Foundation is also covering the Sumangali issue through a project funded by C&A Foundation.

9. For the purposes of this report, the Partnership for Sustainable Textiles shall be referred to as GTA.

About the project

The German Ministry of Economic Cooperation and Development (BMZ) and C&A Foundation are co-financing an initiative managed by terre des homes Germany - India Program (tdh) titled "Sumangali – Eradication of Extremely Exploitative Working Conditions in Southern India's Textile Industry " (SEW). Community Awareness Research Education Trust (CARE-T), a Coimbatore based NGO, is the project holder and is directly implementing the project 12 blocks of eight districts and indirectly in 48 blocks of Tamil Nadu. CARE-T has partnered with Tirupur People Forum (TPF), a network of 43 grassroots NGOs from 23 districts of Tamil Nadu. The project's total budget is € 2,045,056, of which BMZ's contribution is € 1,200,000 while C&A Foundation is contributing € 800,000.¹⁰ The project period is from 1st April 2016 to 31st December 2019.

The direct target group and intermediaries are:

Direct Target Group:

- › 24,000 girls and young women (14 to 23 years) as survivors of the Sumangali
- › 6,600 needy families.

Intermediaries:

- › 2800 community representatives in 60 Blocks
- › 36 government functionaries in 12 blocks
- › 10 representatives of the spinning mill and textile export associations
- › 5 representatives of the workers organisations
- › 20 representatives of international commercial enterprises
- › 20 delegates, 150 representatives of social justice and police departments
- › 40 NGOs as members of TPF
- › 40 media representatives.

<p>The project has four sub-goals</p> <p>Micro level: Sub-goal 1 and 2</p> <p>Meso level: Sub-goal 3</p> <p>Macro level: Sub-goal 4</p>	<p>Sub-goal 1</p> <p>A comprehensive range of support for the medical and psychological care and for educational, trainings and family counselling are available at 12 project locations for approx. 24.000 girls (survivors of the Sumangali Scheme).</p>
	<p>Sub-goal 2</p> <p>The recruitment of girls under the Sumangali Scheme is stopped in 12 Blocks of the direct project area and reduced in 48 Blocks of the extended project area.</p>
	<p>Sub-goal 3</p> <p>Spinning mill associations and associations of the textile exporters in Tamil Nadu implement their recruitment guidelines and Codes of Conduct regarding minimum labour standards and participate in a dialogue for the improvement of the recruitment guidelines.</p>
	<p>Sub-goal 4</p> <p>A draft bill (recruitment law) for the termination of the Sumangali Scheme will be discussed in the state parliament of Tamil Nadu.</p>

It is to be noted that C&A business had supported the pilot phase of this project in 2011 through a four-year project, 'Reduction of worst forms of child labour in textile supply chains (ROWCL) in Tamil Nadu/India'. The pilot project was implemented in six blocks of four districts and worked only at the micro level to prevent recruitment of women and girls under the Sumangali scheme and for rehabilitation of survivors through medical care, counselling, education and skill development.

The evaluation of the pilot phase recommended expansion of the rehabilitation services and prevention work to cover more number of Sumangali survivors. Accordingly, the current SEW project expanded to twelve blocks in eight districts. Additionally, the project extended its scope to include work at the meso and macro levels. All the four districts of pilot phase are part of current project area. The project districts covered in both the phases are shown below:

10. Fair Wear Foundation. (March 2015). FWF Guidance for Members: The Sumangali Scheme and India's Bonded Labour System. Retrieved from https://www.fairwear.org/wp-content/uploads/2011/12/Sumangali_update_2015_2017-changes.pdf

Table 1: Project districts

Project Districts in 2011-2015 and in 2016-2019	Project Districts added in 2016-2019
Coimbatore	Tirupur
Dindigul	Erode
Virudhunagar	Nilgiris
Pudukkottai	Thanjavur

Partner wise project block is in Table 2 (refer to Annexure 7 for more details on partner organisations). CARE-T directly implemented the project in four blocks, READ Foundation in two blocks and the other six partners implemented the project in one block each.¹¹

Table 2: Partner wise project blocks

NGO	Block, District	NGO	Block, District
CARE-T	Anamalai, Coimbatore;	ROSE	Arimalam, Pudukkottai
	Sulur, Coimbatore; Budalur,	SIMCODES	Aathoor, Dindigul
	Thanjavur; Kothagiri, Nilgiris	TEST	Srivilliputhur, Virudhunagar
		READ	Thalavadi, Erode
READ Foundation	Annavasal, Pudukkottai;	Tirupur Auxilium Salesian Sisters Society (Marialaya)	Tirupur
	Viralimalai, Pudukkottai	HOPE CRST	Vadamadurai, Dindigul

About the evaluation

BMZ through tdh along with C&A Foundation commissioned this external evaluation as a learning exercise to conduct an objective assessment of the results achieved thus far, successes, failures and missed opportunities of the initiative. The lessons from this initiative along with focused set of recommendations are expected to inform the subsequent phase or new project under this initiative as well as and other similar initiatives to eradicate forced and child labour.

SCOPE AND OBJECTIVES

The evaluation was conducted in a comprehensive and learning focused manner to understand pathways to eradicate Sumangali system. It focused on assessing the appropriateness of the project design and initiative's experience in the context of changing landscape and comparative to other similar initiatives in the region. For this purpose, the current SEW project (2016 – 19) was taken as continuum of the previous ROWCL project (2011 – 2015).

Specifically, the evaluation objectives were:

1. Review the approach and design implemented by tdh in achieving and/or progress towards outcomes
2. Assess factors (in design and implementation) that have contributed to or impeded achievement of outcomes
3. Examine the relevance, efficiency, effectiveness and results, and sustainability of the initiative
4. Distil actionable and strategic recommendations and lessons from the findings.

Approach

The evaluation adopted a participatory, learning focused and multi-stakeholder approach as it consulted a range of stakeholders including project team, beneficiaries, community representatives, government officials, employer associations, trade unions, NGOs and media. The evaluation used Organization for Economic Corporation and Development (OECD)-Development Assistance Committee (DAC) criteria of relevance, effectiveness and results, efficiency and sustainability and DeGEval standards. The process adopted qualitative method to collect evidence and lessons in a gender and youth sensitive manner.

11. The project did not carry out community level prevention work in Tirupur block.

METHODS AND COVERAGE

The evaluation was conducted in four stages, i.e. inception and design, data collection, analysis and report development, from mid-January to end-May 2019. The evaluation deployed qualitative in-depth interviews (IDI), key informant interviews (KII), focus group discussions (FGD) and intensive desk review.

Scoping and design

The evaluation started with an inception meeting followed by individual in-depth interviews (IDI) with representatives of C&A Foundation, tdh and CARE-T. These discussions contributed to finalisation of the evaluation questions and data collection tools. The evaluation team also conducted initial desk review of all the project documents, evaluation reports and researched other initiatives in the region and media reports. The list of finalised evaluation questions and list of documents reviewed is attached as Annexure 1 and 8 respectively.

Reconstruction of theory of change

Review of project proposal revealed gaps in the project's results framework. Accordingly, the evaluation team in consultation with project team and C&A Foundation reconstructed the project's Theory of Change (TOC).

The TOC is based on the project strategy, the committed results or sub-goals and the overall project objective. An indicator table was also developed to map the indicators of the results at all the levels identified in the TOC. The TOC and indicator table is attached as Annexure 2 and 3 respectively.

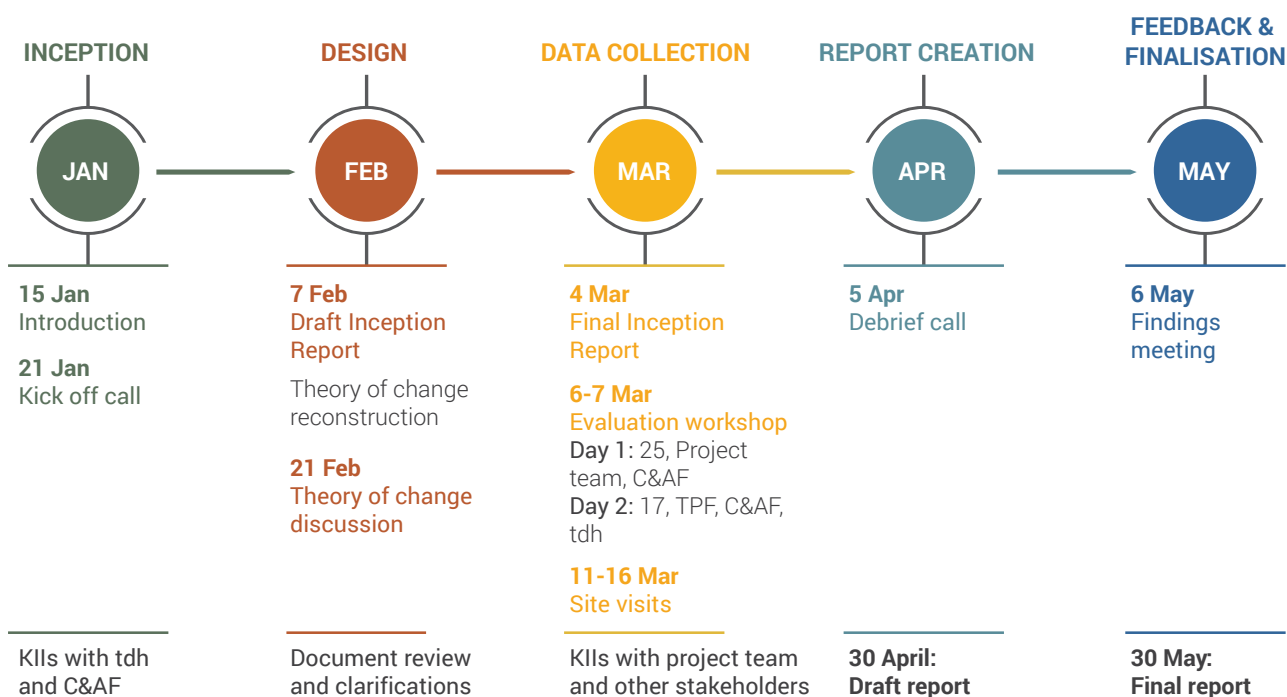
Rating system

As per the terms of reference, a three-point rating system was developed to assess the overall performance of the project in an objective manner (refer to Annexure 9 for details). The rating uses three-point scale, i.e. Good, Poor and Adequate for each of the evaluation criteria, i.e. relevance, efficiency, effectiveness and results, and sustainability.

Data Collection

The data collection was participatory which involved direct and indirect beneficiaries, the project team, and other internal and external stakeholders. The method comprised of an evaluation workshop, site visits and stakeholder interviews. The participant list of evaluation workshop, detailed plan of site visits and the list of stakeholders interviewed is attached as Annexure 4.

EVALUATION TIMELINE



Evaluation workshop

A two-day evaluation workshop was organised in Coimbatore city on 6th – 7th March. 25 project team members and 17 TPF members attended the workshop and deliberated upon theory of change, achievements, challenges, and lessons and recommendations for future.

Site visits

After the workshop, the evaluation team visited six project blocks in five districts from 11th - 16th March in two teams. The sampling strategy ensured a representation of different geographical regions of the project area, geophysical features (hilly and plain), settlement pattern (urban and rural), source and destination areas and implementation area for both the phases. Out of six blocks visited, CARE-T is implementing the project in two blocks while partner NGOs are implementing in the other four.

Overall, the evaluation team visited six Regional Resource Centres (RRC), six Child and Youth Centres (CYC) and 16 villages. The team conducted 37 FGDs and nine IDIs at the community level that covered 191 direct beneficiaries and 46 caregivers and community representatives. In addition, the team also met three peer groups of Sumangali survivors and another three groups of Sumangali survivors who did not participate in the programme.

Stakeholder interviews

At the district and block levels, the team conducted 15 KIIs with government officials. The team also conducted seven FGDs and 12 KIIs with the project staff. The evaluation team interviewed one employer, one representative of SIMA, two representatives of NGOs (not part of the project), three media representatives, one trade union representative, one expert of NIMHANS, convenor of TNA and MSI-TN, and other relevant experts during the visit or over phone. Further, the evaluation team conducted nine KIIs with representatives of the tdh and C&A Foundation.

LIMITATIONS AND CHALLENGES

The evaluation team did not interview any parliamentarian, legal expert, representatives of spinning mills and textile exporter associations such as TASMA and TEA due to their unavailability. The timing of the evaluation coincided with the peak of the national election campaign as a result of which parliamentarians and political representatives were unavailable. The project team was unable to connect the evaluation team to employer associations, indicating their limited engagement with these key stakeholders. At the community level, there was less than intended coverage of two categories of respondents, i.e. who had attended only group counselling sessions and Sumangali survivors who did not participate in the project. In absence of sufficient monitoring data on the results reported, some of the reported results or the extent of deviations were not validated.

Overall, the evaluation team visited six Regional Resource Centres (RRC), six Child and Youth Centres (CYC) and 16 villages. The team conducted 37 FGDs and nine IDIs at the community level that covered 191 direct beneficiaries and 46 caregivers and community representatives.

In addition, the team also met three peer groups of Sumangali survivors and another three groups of Sumangali survivors who did not participate in the programme.

TWO.

Evaluation Findings

The evaluation findings are presented as per evaluation criteria, i.e. relevance and validity of design, effectiveness and results, efficiency and sustainability.

Relevance and validity of design

RELEVANCE TO THE DEVELOPMENT CONTEXT AND NEED OF THE BENEFICIARIES

The overall objective of eradicating Sumangali system in Tamil Nadu's textile industry is highly relevant to the development context of the project area. The textile factories in the region employ a large number of girls and women under Sumangali and other similar schemes. These workers face a combination of conditions in line with forced labour, child labour and bonded labour. Further, there are many girls and women who are employed as daily wage earners under 'van scheme' and face forced labour conditions. The project rightly included this vulnerable group in the project even though it was not originally planned. The large-scale prevalence of exploitative systems in the textile industry can be gauged from the fact that the project identified more than 35,000 survivors in 12 project blocks till December 2018 and is still identifying new cases.

The objective of economic rehabilitation is highly relevant as all the survivors are from economically deprived families and join the Sumangali system due to their financial vulnerabilities. Provision of psychosocial support and medical care is pertinent for survivors who have persistently suffered from physical and mental health issues like sleeplessness, depression, anaemia, stomach

related diseases, etc. Additionally, these survivors lacked access to quality health care. However, in absence of baseline or need assessment data on physical and mental health, the extent and relevance of this support is not clear. Interactions with beneficiaries suggest that some of the young women, especially those who were working under the Sumangali scheme until recently, required psychosocial care and support. However, there are many beneficiaries who had left the Sumangali scheme more than two to five years ago. Further, it is observed that life skills training is relevant to all the girls and young women irrespective of their mental health status.

The prevention strategy, which focused on awareness generation activities on negative impact of the Sumangali system, is partly relevant. While many of the girls and their families are deceived by false promises and wrong information, many other families send girls even though they are fully aware of the exploitative conditions. The other factors responsible for recruitment under Sumangali system include lack of locally available employment opportunities, safety concerns in villages and college hostels, teenage elopement and limited capacity amongst women workers to voice their concerns in a collective manner. The project strategies did not address the above-mentioned factors adequately.

The project's objective of implementation of a universal code of conduct and recruitment guidelines regarding minimum labour standards is highly relevant as it aims to bring about systemic change in the industry. A universal code, if adopted by employer associations and implemented by factories, can significantly contribute to eradication of Sumangali like schemes.

The existing laws allow textile units to employ adolescents in the age group of 14-17 years, which is a significant gap in current legal regulation, since it allows for employment of 14-17 year old children in non-hazardous industries. The project's objective to draft a new recruitment law to eradicate Sumangali scheme is relevant, however, considering the complexity and long process of formulating a new law, the design could have explored policy advocacy alternatives. These alternatives include evidence based advocacy for better enforcement of existing laws and judicial mechanisms like 'public interest litigation' to challenge the legal loopholes.

Overall, the project is relevant to eradicate extremely exploitative working conditions under Sumangali like schemes especially by bringing systemic changes at the meso and macro levels.

RELEVANCE TO THE DONORS

The project directly contributes to the German Ministry of Economic Cooperation and Development (BMZ) development cooperation agenda which includes combatting poverty, securing food, establishing peace, freedom, democracy and human rights, shaping globalisation in a socially equitable manner and preserving environmental and natural resources. India is one of the partner countries.

C&A Foundation is a relatively young organization that envisions 'a fair and sustainable fashion industry that enables people to thrive'. The pilot project of this initiative was funded directly by the C&A business as the Foundation was not formed then. The current project is well aligned to the Foundation's theory of change to eradicate forced and child labour in the supply chain. It directly contributes to three of the five stated results of C&A Foundation, i.e. survivors are rehabilitated and attain viable livelihoods, improved policy environment that advances women's rights and labour rights, and communities are strengthened and can prevent forced and child labour.

RELEVANCE TO THE IMPLEMENTING ORGANISATIONS

The project objectives are fully aligned to the mandates of tdh, CARE-T and other partner organisations. Since 2006, CARE-T and tdh have collaborated to eradicate child labour and the Sumangali system in the textile industry. CARE-T is considered as one of the leading organisations working to eradicate the Sumangali system. The tdh supported formation of TPF, which now claims itself to be the most prominent and the biggest network of community-based organisations working on the issues of forced and child labour in the region.

VALIDITY OF THE PROJECT DESIGN

The project design consists of four pathways or sub-goals to achieve the overall objective of eradication of the Sumangali system (refer to Annexure 2 for theory of change diagram). The four pathways contribute to the overall goal, however, are not sufficient to completely eradicate Sumangali system. The design does not address systemic issues like poor enforcement of existing laws and lack of capacity among women workers to

negotiate for their rights. The sub-goals 3 and 4 target systemic changes at meso and macro levels and are long term, which will require sustained effort even after the project period. Also, better inter-linkages between sub-goals could have further contributed to achieving the overall goal. For instance, better linkage between sub-goal 4 at macro level with sub-goals 1 and 2 to generate evidences for advocacy.

Sub-goal 1

Rehabilitation of Sumangali survivors (micro level)

Provisioning of rehabilitation services to the Sumangali survivors is the biggest component of the project as 50 percent of the total budget is allocated for this sub-goal. The project continued with the design of the pilot project, i.e., setting up of RRCs to deliver the psychosocial counselling and medical care for emotional stabilisation, and skill trainings and educational support for rehabilitation. Phase 1 evaluation had recommended designing the second phase of the project in a holistic manner, with counselling and rehabilitation as the core elements to prepare the girls and young women for education and skill training. However, the difference in targets set for two core components of rehabilitation services, i.e. psychosocial support and vocational training and education shows that the design did not consider this recommendation. The design targeted 18,000 survivors for psychosocial support and only 6,600 for vocational training and 2,440 for education. The project proposal does not explain the rationale for this difference in targeting on these two streams of service (counselling versus training and education). Further, there is lack of clarity about placement targets. Consequently, the number of beneficiaries who would benefit from long-term positive changes in their life is far less than the numbers reached out under the project.

Accordingly, the design of this sub-goal is not adequate to ensure holistic rehabilitation of a majority of the beneficiaries.

Sub-goal 2

Recruitment of girls under the Sumangali scheme is stopped in project area (micro level)

Under this sub-goal, the project design included activities and outputs to create awareness about the negative impacts of the Sumangali scheme at the micro level. The awareness generation targeted survivors and their caregivers, community representatives and other stakeholders like government officials, trade unions, other NGOs, teachers, etc. As part of the design, the project also proposed organisation and training of Sumangali survivors and community representatives, exchange meetings at block and district levels and case investigations.

At the micro level, the project intended to organise survivors and community representatives into groups, however, the operational strategy is not clear. For example, two groups of survivors were to be formed in each block, however, it is not clear whether these groups were to be formed at the village or block level. As a result, the number of survivor groups at the village level varies in each project block. There is also an absence of interrelatedness between the different activities, which makes it ambiguous as to how the overall objective of eradicating the Sumangali scheme in the entire block shall be achieved. As part of the prevention strategy, the design included only two activities in the extension blocks without providing rationale for them.

To conclude, the design is inadequate to comprehensively cover the entire project area and overlooks various systemic issues. Prevention measures are thus limited to preventing women and girls from seeking employment under the scheme rather than prevention of the 'practice' of unfair recruitments.

Sub-goal 3

A universal code of conduct: "Minimum Standards for Employment and Conditions of Work for Recruits in Textile Industry" (meso level).

In order to develop the mill code, the project design envisaged a multi-stakeholder dialogue mechanism, similar to GTA, with membership of employer associations, German and European textile companies, trade unions and NGOs. This process was to be supported by legal experts and the German Textile Association.

Setting up of multi-stakeholder mechanism and adoption of the universal recruitment guideline is also a political process, which requires lobbying to bring the stakeholders on a common platform. The project design provisioned for three multi-stakeholder meetings with a gap of one year in a standalone manner, which is inadequate to facilitate the multi-stakeholder dialogue process without supporting activities. Further, the design did not identify challenges and risks related to participation of stakeholders with divergent interests to work towards common objective.

Sub-goal 4

Recruitment law for the termination of the Sumangali scheme (macro level)

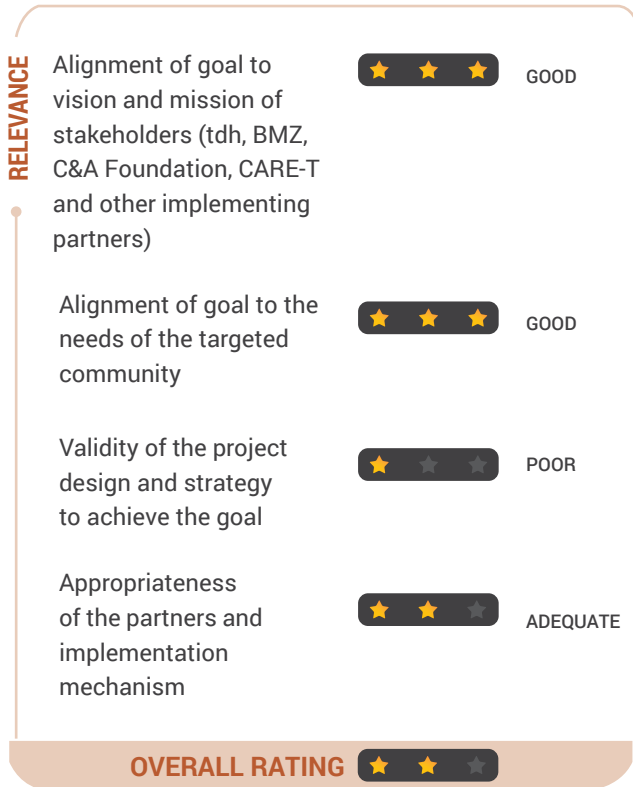
The design takes an approach to draft the law with the help of legal experts and present to the government for ratification. The Tamil Nadu state government does not acknowledge presence of the Sumangali system and it is unlikely that the state government will accept the draft law. The alternate approach of introducing the draft law as private member's bill for discussion in the State Assembly is available. However, either of the approach requires intensive lobbying and environment building to influence the lawmakers. Considering this, the project design to draft the new law is not stakeholder driven and inadequate for having the draft law discussed in the State Assembly.

PARTNER SELECTION AND SELECTION OF PROJECT AREA

The selection of the project area, i.e. 12 blocks seem to be appropriate as they are the source locations for Sumangali survivors and in some cases, destination as well. As a good practice, CARE-T along with its partners conducted a rapid assessment to check the presence of Sumangali survivors before selecting the project blocks.

The partners' selection for implementation of project activities at the micro level is appropriate since the core strength of all partners is community mobilisation and they have a good understanding of all issues related to Sumangali system. With regard to objectives at the meso and macro levels, CARE-T and TPF have experience of networking with key stakeholders. However, CARE-T and TPF did not have experience in facilitating multi-stakeholder dialogue approach and engagement with industry association before the project started.

The relevance of the project is good; however, the design was found to be weak. The overall rating under this parameter is Adequate.



Effectiveness and results

The findings of the evaluation on effectiveness of strategies and results achieved are organised as per the four sub-goals as committed in the project. The results are presented at the outcome (short term) and output levels as the project is still in its final year of the implementation. The results reported are up to 31st December 2018, i.e. end date of the last reporting period.

EFFECTIVENESS OF SUB-GOAL 1

Comprehensive range of support for the medical and psychological care and for educational trainings and family counselling are available at 12 project locations for approximately 24,000 girls (survivors of the Sumangali Scheme)

The project strategy under this sub-goal was to undertake comprehensive rehabilitation of Sumangali survivors through the following activities:

- › Need analyses
- › Psycho-social support
- › Medical Care
- › Educational Support (Skill Training)
- › Government Social Services/Family Support
- › Support Program School

The effectiveness of results achieved under sub-goal 1 is as follows:

Enhanced life skills of 5,496 beneficiaries who attended the programme in a holistic manner

The rehabilitation strategy was effective in building life skills of 5,496 beneficiaries who utilised the services of RRC in a holistic manner for a period of six months to one year. The services include group and individual counselling sessions, life skills trainings and vocational training or reintegration with educational system. Evaluation team met many of these beneficiaries during site visits and for most of them the rehabilitation process is a life-changing experience. The girls and women feel confident, satisfied and empowered to take decisions for themselves. Parents displayed pride in their daughters and expressed their gratitude towards the project for rebuilding their daughters' lives. Efficient functioning of RRC as a safe space and its staff's continuous mentoring was instrumental in achieving this result. Since the project beneficiaries were girls and young women, the project by default addressed the gender and youth issues in the region.



The results are presented at the outcome (short term) and output levels as the project is still in its final year of the implementation.

The results reported are up to 31st December 2018, i.e. end date of the last reporting period.

Testimony of a proud father of a trained nurse in Coimbatore

A construction worker in Suler block of Coimbatore district was having difficulty in finding work due to slump in the construction sector. Someone approached him with employment opportunity for his eldest of three daughters, which he agreed to because of his financial status. While he was deeply unhappy about making his daughter work for long hours under difficult working conditions at a young age in the textile mill, he felt he was left with no other choice.

One day, his daughter approached him and told him about the project, which was providing financial support to continue her education. He agreed to this and his daughter joined the two-year nursing course. During this period, the family somehow managed their expenses. His daughter is now working as a nurse in a local hospital and earning INR6,000 per month. He feels proud of his daughter and mentions that the project's support changed his daughter's and family's life. He believes that nursing is far more respectable profession and the work conditions are not so tough.

“ After returning from mill work, my daughter was distraught and dejected. CARE-T program has completely changed my daughter's and my family's life. I feel proud that my daughter is doing a very important service as nurse. ” shared the father, a construction worker, with tears in his eyes.

Successful rehabilitation of girls in alternate livelihoods and in education system

The project trained 4250¹² survivors in tailoring and other alternate livelihoods against a target of 6,600. As reported, 2,039¹³ of these girls and women have started earning either in jobs or self-employment after successfully completing the vocational training. Also, the project supported 1,246¹⁴ Sumangali girls for their reintegration into education system against a target of 2,440¹⁵ girls. The project's financial support incentivised survivors into attending vocational training and education programmes and played a critical role in aiding the participation of girls and women in the initiative. The project created its own infrastructure for tailoring course while for other trades it supported by sponsoring the course fee. The project sponsored travel costs between their homes and vocational training centres of all the beneficiaries.

However, the project did not achieve its targets set against the critical indicator of provision of better jobs, i.e. a minimum income of INR 300 per day as committed

in the proposal. Only 23% of the girls, who are either employed or self-employed, are earning INR 300 per day or more¹⁶. This was also validated during evaluation team's discussions with beneficiaries. Since many of the beneficiaries are self-employed, this earning fluctuates depending upon the orders received, especially in the tailoring and beautician trades. Further, the girls in employment do not have contract letters issued by their employers while some of them are paid less than minimum wages and have long working hours. Many of the girls mentioned that these jobs, even though low paying, are still better than employment at textile factories. They reported being satisfied since they are able to stay close to their homes, and do not have to bear the blaring sound of sewing machines or the monotony of work in factories.

As part of the education support, girls were also supported for preparation of competitive examinations for government jobs, which some of them qualified successfully. The staff in Suler block gave example of girls who have joined the police department after receiving educational support through the RRC.

12. Source: Yearly progress report for 1 January to 31 December 2018

13. ibid

14. ibid

15. Source: Application to Federal Ministry of Economic Cooperation and development for funding the SEW project, 2016

16. Source: Based on project monitoring data available for 347 beneficiaries from five blocks namely, Suler, Viralimalai, Arimalam, Aathoor and Tirupur.

Some of the results (as per the project impact matrix) that are not fully achieved:

Needs assessment of 24,000 Sumangali survivors

The project reported needs assessment of 35,422¹⁷ girls and women till 31st December 2018, which is much higher than the target number of 24,000¹⁸. The assessment was carried out using short survey form titled, "Livelihood enhancement program application for young workers of textile mills and garment industries". While the need assessment captured information related to education, socio-economic situation and employment in textile units, it did not include any information on mental and physical health.

The project design had envisaged creating an individual case file for all the identified survivors, which was not implemented. In totality, the needs assessment exercise worked more to identify the beneficiaries, share project related information with them and to invite them to join the project. Accordingly, this activity had sub-optimal contribution to the project.

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“ It felt good to be a part of the group meeting, we had many activities and games in it. We got to know about the training programs CARE-T offers and we were given a chance to join them. We could not join the programmes because we have infants who require breast feeding, however we will be joining in a few months once our children are older.

Beneficiaries who attended only group counselling

Emotional stabilisation of 18,000 Sumangali survivors

Since there is no record of mental or physical health status of the identified girls and women, the project assumed that all the identified girls and young women required psychosocial counselling support and medical care. According to reports, 16,765 beneficiaries are emotionally stabilised which is the total number of survivors who participated in one group counselling session each. While a pre-counselling survey was conducted with all the participants of group counselling, the post-counselling survey was conducted only with the participants of individual counselling. This data was not consolidated properly, is unfit for analysis and does not provide any conclusive evidence with regard to change in mental health status. Please refer to Annexure 5 for a detailed analysis of psychosocial care methods used in the project.

Considering the group size, content and methodology of the group sessions and beneficiaries' accounts, it is concluded that group sessions are a relevant first step but not sufficient to provide therapeutic emotional stability to survivors.

Medical care

As per the design, medical care was to be provided to Sumangali survivors. There is no target value for this activity as it was supposed to be need based. The project reportedly conducted 64 medical camps, which was attended by 10,174 Sumangali survivors. However, the evaluation found that the medical camps were conducted in a stand-alone manner and the number of Sumangali survivors who attended the medical camps was not separately recorded. As per the data, 10,174 people attended the camps including survivors, their families and other community members. Discussions with the project team suggest that many survivors were supported with medical treatments in cases of severe ailments and were provided medical advice in other cases. In one instance, one of the RRCs tracked haemoglobin levels of the anaemic cases, provided nutrition related counselling and tracked of positive changes in the health of the survivors.

17. Source: Yearly progress report for 1 January to 31 December 2018

18. Source: Application to Federal Ministry of Economic Cooperation and development for funding the SEW project, 2016

Linking families with government schemes

This activity was part of comprehensive rehabilitation support. The purpose was to help families attain income support, and lessen shocks when their girls withdraw from the Sumangali scheme. According to the latest annual report, 7,745 families were linked to government schemes by 31st December 2018 against a target of 6,600 families.

However, in practice, this activity was implemented in a standalone manner and the service was extended to all the families that were seeking support. Some of the partners mainstreamed Sumangali cause into their livelihood programs, for e.g. linking micro-credit groups with institutional finance or promoting farmer's organisations in which Sumangali survivors' family was a member. There are many instances where the linkages have resulted into financial benefits for the family, for instance, through marriage assistance schemes, pension schemes, employment guarantee scheme etc. However, there are many other cases where the linkages did not generate any direct financial benefit for the families, for

e.g. issuance of PAN card, birth certificate, community certificate, etc.

In the absence of relevant data, the extent of contribution of this strategy towards the intended objective cannot be ascertained. However, it is clear that support from government schemes help families meet their contingency needs but it does not enhance income levels to the extent that it could act as a deterrent to girls joining Sumangali system.

Tailoring as a leading trade for vocational training

The project had targeted to train 4,300 – 4,500 beneficiaries in tailoring for which tailoring centres were set up within each RRC. So far only 2,064 beneficiaries are trained which is less than 50% of the target and a significant gap. This gap resulted from overestimation of expected number of girls and women who would choose this trade. Survivors did not choose tailoring because of its limited earning potential. This suggests that a market study by specialised agency to understand the feasibility of different vocations in the local context can be useful.



EFFECTIVENESS OF SUB-GOAL 2

Recruitment for Sumangali is stopped in 12 communities

The project's strategy towards prevention of recruitment at the micro level included the following components:

- › Organizing Sumangali survivors and relevant stakeholders through formation of Sumangali Survivor Groups (survivor groups) and Anti-Sumangali Activity Groups (activity groups).
- › Training of Multipliers to spearhead prevention activities in 440 villages in 12 blocks.
- › Sensitizing stakeholders in 60 blocks and government officials in 12 blocks
 - Multi-stakeholder exchange meetings in 60 blocks (including 12 direct and 48 indirect implementation blocks) on an annual basis
 - Annual Information Meetings for government support in 11 blocks
- › Child and Youth Activity Centres (CYC) for remedial training to children and organising youths.
- › Case investigations and documentation for lobbying to eradicate the Sumangali system and village level dissemination for increased awareness about the negative impacts of the Sumangali scheme.
- › District level expert conference, press conference and awareness generation campaigns in 20 districts on an annual basis.
- › Train 440 community representatives from 12 blocks on laws related to Sumangali and child rights, who would carry out monitoring and documentation of recruitment attempts at the village level.

The effectiveness of results achieved under sub-goal 2 is as follows:

Enhanced awareness amongst caregivers and community representatives about the Sumangali scheme and its negative impacts.

The project reported information dissemination amongst 23,921 (target 8,000) caregivers and 6,517 (target 2,800) community representatives about Sumangali scheme and its negative impacts, child rights, girls' education and safe migration of adult females.

Discussions with the communities suggest that caregivers and community representatives are aware of

the Sumangali scheme and its negative impacts as well as the right to education. Most of these respondents reported that they would not send girls and children to the factories and instead support them for higher education and better employment. It should be noted that the dropout rate of girls in the project villages before grade 10th was low, which is also seen in the low number of girls being reintegrated into school education. Consequently, the educational reintegration by the project took place more at the high secondary and college levels than at primary and secondary school levels. Weak economic condition is the primary reason for girls dropping out of schools at the primary and secondary levels.

Since the evaluation was conducted using qualitative methods, the numbers reported by the project cannot be conclusively validated but the evaluation team estimates them to be correct given the expanse of the project and the range of awareness generation activities conducted in the villages.

Active contribution of survivors, caregivers and community representatives in the awareness creation amongst the communities

The project reported that about 30 percent (2,400) of the caregivers and community representatives are contributing effectively to create awareness amongst the communities about the Sumangali scheme, child rights and safe migration against a target of 25 percent (2,000).

The evaluation team observes that the proactive members of the survivor groups and stakeholder groups formed in the project are contributing actively towards awareness generation in the communities. As per the project progress reports, 1,073 survivors and 1,998 caregivers and community representatives are organised in survivor groups and anti-Sumangali activity groups respectively. Members of these groups reported that they mostly conduct door-to-door visits to inform parents about negative impact of the Sumangali scheme. Few survivors reported that they were able to convince their parents not to send their siblings to work in the factories. Some of the group members in FGDs also cited instances when they successfully persuaded caregivers not to send girls to join Sumangali scheme.

Overall, the active contribution of many of the survivors, caregivers and community representatives contributed towards preventing recruitment of young girls and women in the Sumangali scheme.

The evaluation team was able to meet a few families who were persuaded not to send their daughters for employment under Sumangali scheme by the anti-Sumangali activity groups and project staff. However, there is no consistent record of the number of girls prevented from being recruited under Sumangali, directly as a result of such measures.

Enhanced awareness amongst children and youth about the negative impacts of Sumangali, right to education and child rights

The project reported organising 2,410 youths in 185 groups and providing remedial classes to 2,117 children in 16 CYCs. Interactions with children and youth at the six CYCs visited by the evaluation team suggest that children are aware of their right to education and youth are aware

of the negative impact of the Sumangali system. Children at the CYCs confidently assert their will to complete education and most of them aspire to get into professions like teacher, doctor, police etc. The project team reported that this awareness amongst youth and children also contributed to prevention of recruitment under the Sumangali system.

Gram Panchayat¹⁹ initiatives to prevent recruitment under the Sumangali scheme

In some of the blocks, few Gram Panchayats have reportedly passed resolutions to prevent recruitment of women and girls under the Sumangali scheme. The project team also reported that local level advocacy by the project team has resulted into few Gram Panchayats maintaining 'Migration Register'²⁰. More details on coverage are not available.

Village level Anti Sumangali Activity Groups working on preventing recruitment and development of village

An Anti Sumangali Activity Group was formed in one of the villages in Sular block in January 2018. The group has nine members from seven women Self-Help-Group (SHG) in the village.

The project nurtured this group to work on a range of issues concerning women, girls and village development. The group organised awareness sessions on child rights, women rights and negative impacts of the Sumangali system. Further, sensitisation programmes focused on pollution and environment issues, which led to the group removing plastic from the village and planting 20 trees. Most importantly, the project trained the group members in artificial jewellery making. This livelihood training significantly contributed to a strong relationship of trust between the project and the group.

The group meets every quarter, however, attendance of all the group members is not consistent. The group members mentioned that absenteeism does not impact the work of the individual members as they continue to participate in activities.

The village has nearly 4000 households and about 20 mills are located in its periphery. The average capacity of each factory is around 100 workers. The factories have hostels in their campuses and also have vans to transport local workers. The average wage rate is about INR250 per day for an 8-hour shift and INR50 per hour for overtime work.

The mills were set up around 25 years ago and initially entire family used to work in the mills. Few of the group members had worked in these mills as teenagers. The group members reported that around 200 girls and women from this village used to work in these factories till four years ago. According to them, this number reduced significantly due to the project. The group members further claimed that they stopped ten girls from working in mills in the last six months. The prevention strategy used by the group include meeting with family members of the girls and informing them about the negative impact of working in mills. They also inform about the services provided by the project. According to them, nearly 70% of the families agreed to not to send their daughters to these mills.

Currently the Gram Panchayats are being managed by grassroots level government officials and not elected leaders as the Panchayat elections are delayed in Tamil Nadu. Even then, this is a significant unintended impact of the project, which has the potential to prevent recruitment under the Sumangali scheme in a sustainable manner.

Successful case investigations led to release of claims

The project reported 139 successful extra-judicial case investigations in three districts; Pudukottai (40), Dindigul (54) and Erode (45), for recovery of payments from the factories related to accidental deaths, accidents and withheld provident fund amounts. The NGO partners used TPF platform to conduct case investigations and get the claims released.

In Vadamadurai block of Dindigul district, HOPE CRST, the project partner was able to build good relationship with officials of around 12 mills and garment factories in the district during case investigations. Apart from getting the claims settled, the partner was also able to place one of the trained survivors as a tailor in a garment unit. This work also enhanced the partner's reputation as an active labour rights organisation in the region and was noticed by the District Collector, the administrative head of the district. The District Collector recommended mills and garment factories to include HOPE CRST as a member of the Internal Complaint Committees (ICC). This is still in process.

TPF participated in a public hearing organised by State Women's Commission in October 2018 at Chennai. TPF represented 25 cases of which 5 were related to deaths, 2 with accident related compensations and 18 were about withheld provident fund amount. Participation in public hearing was highly effective as eight survivors have received full payments amounting to INR 130,857 and one victim has received part payment of INR 50,000. In six cases, employers have agreed to pay the outstanding amounts while TPF is following up in other nine cases²¹.

These case investigations helped in building pressure on employers, which if taken up in all the districts can influence recruitment practices and terms of employment.

Momentum created for child rights, child protection and safe migration at the block and district levels

The project activities at the block and district levels have resulted into a momentum regarding issues related to child rights and safe migration, which was covered by local media. The case investigations also helped in directing attention towards issue of exploitation of women worker's in mills and associations. It is observed that these efforts also contributed to building pressure on the employers. As reported, some of the labour brokers who attended the block level meetings committed not to recruit girls under Sumangali scheme after hearing the accounts of Sumangali survivors.

The effectiveness of strategies related to areas of improvement under sub-goal 2 is as follows:

Organizing Sumangali survivors and village and block level stakeholders

According to the project design, 1200 Sumangali survivors were to be organised into 24 survivor groups, i.e. two per block. The project also proposed to organise survivors, parents, teachers, members of SHGs, NGO representatives in 12 anti-Sumangali activity groups (known as activity groups in the project), i.e. one per block. Against this design, the project formed 96 survivor groups, 106 village level activity groups and 48 block level activity groups. The number of groups formed in each block varies. The evidence suggests that these groups do not cover all the 440 villages as targeted in the project. The village level groups are still at a nascent stage and the role of block level activity groups in the overall prevention strategy is not clear. The groups do not focus exclusively on Sumangali and/or gender issue as they also work on issues related to waste management, negative impact of plastic, plantations in the village, etc. Most of the groups do not discuss issues related to labour rights and are unaware of minimum wage provisions or their entitlements as a worker. In many cases, the activity groups are limited to members of one caste group. Also, since many labour brokers are from the same community or caste group, the organised

19. Locally elected self-governance bodies

20. An official document maintained by Gram Panchayat as a roster of people who migrated from the village along with the destination details

21. Source: Data provided by the project team - List of Participants and follow up data for public hearing organized by Tamil Nadu State Commission for Women on 23 October 2018

survivors and stakeholders do not report violations officially. It was also observed that the groups do not challenge existing social norms related to child marriage and gender. The groups did not actively pursue the cause of youth empowerment. Further, none of the group members evolved as leader either at the village or block levels. Accordingly, the prevention strategies were not adequately youth or gender sensitive.

Multiplicator training

As per the project design, 440 community representatives (one from each of the 440 targeted villages) were to be trained as Multiplicators to monitor and document recruitment attempts under Sumangali. In the first two years, the project reported training 579 village representatives while in third year the project reported overall achievement of 808 village level trainings for 23,961 persons. The project misinterpreted 440 Multiplicators as 440 village level trainings. The village level trainings are used as an initial exercise to make an entry in the village before Sumangali need assessment survey. As such, this activity was not implemented as planned.

Table 3: Coverage of block level exchange meetings

Year	2016	2017	2018
Direct blocks	5	6	-
Indirect blocks	24	6	10
Total	29	12	10

The project proposal mentions 240 block level meetings in 60 blocks (12 direct and 48 indirect) under the banner of TPF, with one meeting per block per year. The purpose of this meeting was to bring together 35-40 representatives of community, trade unions, NGOs, field level workers of the government to share their experiences and act as peer educators against the recruitment practices of Sumangali. TPF has so far organised only 51 block level meetings.

Even in this case, there is misinterpretation of targets, i.e. 60 blocks are understood as 60 meetings. As a result, all the 60 blocks are not covered annually. Significantly, there are 5 direct and 26 indirect blocks, which remain uncovered (refer to the table 7).

Information Meeting of Block Representatives

According to project design, the objective of this meeting was to bring together representatives from education institutes, community leaders and government officials on a single platform to mobilize government officials' support to eradicate Sumangali recruitment. The project had targeted to cover 11 blocks in four years at the rate of one meeting per block per year. The latest annual report has not reported this activity. The earlier reports mention 8 meetings in four blocks in the first year and 5 meetings in the second year. It is clear that the project has not covered all the eleven blocks as per the plan. Discussions with block level representatives suggest that the block level officials shared information about the schemes and were a part of raising awareness about issues related to child rights and gender rights. The discussions and the internal reports indicate that the Sumangali issue was not directly discussed in these meetings.

District level awareness campaigns

As per the plan, the project had to conduct one-day expert conference, followed by press conference and demonstration in 20 districts every year. Accordingly, the project had targeted to conduct 80 district level meetings. TPF has so far conducted 18 district level conferences, 10 in second year and 8 in third year. The latest annual report, mentions 20 district level meetings as the target to be achieved, which is incorrect. Also, the project did not hold press conference or demonstrations as planned.

Table 4: Coverage of district level meetings

Direct districts	2017	2018	Expanded districts	2017	2018
Coimbatore	✓	✓	Dharmapuri	✓	
Dindigul	✓	✓	Salem		✓
Erode		✓	Theni - Chinnamanur	✓	✓
Pudhukkottai	✓	✓	Thiruvanna-malai	✓	
The Nilgiris	✓	✓	Tirunelveli	✓	
Virudhunagar	✓	✓	Villupuram	✓	
	5	6		5	2

EFFECTIVENESS OF SUB-GOAL 3

A universal code of conduct: “Minimum Standards for Employment and Conditions of Work for Recruits in Textile Industry”

At the *Meso level*, the project conceived of a multi-Stakeholder led dialogue process to develop recruitment guidelines for the Textile Industry.

The status of result under this sub-goal is as follows:

Draft recruitment guideline for textile industry is prepared

The project collaborated with National Law School of India University (NLSIU) to develop the recruitment guideline and its abridged version ‘Mill Codex’ for textile industry. The draft guidelines include feedback of experts and trade unions. However, the document does not include feedback of employers’ associations yet.

The effectiveness of strategies under this sub-goal is discussed below:

Preparation and drafting

The project’s collaboration with NLSIU, Bangalore to draft the Mill Codex was a judicious and strategic step as NLSIU’s credentials can help in establishing the Code’s independence and technical validity leading to wider acceptance of the document.

The drafting process was detailed and intensive which included review of all the relevant legislations, gap analysis of codes of conduct of six major brands and a comparative analysis with SIMA’s code/guidelines for employment in textile industry of 2009. Trade unions, legal and child rights experts have commented upon the guideline and their recommendations are incorporated. Legal experts in Germany recommended developing the guidelines as a reader-friendly document. This led to ‘Mill Codex’, an abridged version of the recruitment guideline and a briefing paper, “Commodity Chain: Tales from Tamil Nadu’s Spinning Mills”. This took additional time and delayed the drafting process. It is to be noted that the drafting process did not involve the employer associations, who are key stakeholders of the Mill Codex.

The project did not conduct any activity to include views of either youth or survivors in the drafting process. Only a small number of workers were covered in the field research study, which did not include any discussion on Mill Codex.

Further, the analysis of codes of six major brands was conducted as part of the drafting process. The analysis document is detailed, however, lacks overall comprehensive analysis and specific recommendations. Accordingly, it is not clear how this analysis benefitted the drafting process. SIMA launched a revised version of its guidelines for employment, ‘Code/Guidelines for employment in Textile Industry (Version 2.0)’ in December 2018, which it prepared with support from British Standards Institution (BSI). The evaluation team notes that the project should have aligned with SIMA during the revision of their guidelines

Multi-stakeholder dialogue process

While the proposal outlined a multi-stakeholder dialogue process to develop and implement the recruitment guidelines, the process so far has not included employer associations.

The project organised first multi-stakeholder meeting in December 2018, which was attended by employers (representatives of textile companies), NGOs, women commission, media and subject matter experts. However, employer associations, i.e. SIMA, TASMA and TEA and trade unions were notably absent. Further, this meeting discussed implementation of Tamil Nadu Hostel and Homes Act, 2014 and other relevant laws. In this meeting, the employers highlighted their challenges in implementing the laws. In response to that, the government officials offered their assistance to the employers in overcoming the challenges. This meeting was able to arrive at a broader consensus on implementation of Sexual Harassment Act and Tamil Nadu Hostel and Homes Act. This meeting helped the project in building its relationship with few select employers, which can contribute to implementation of existing laws. However, it did not contribute to the intended purpose, i.e. acceptance of Mill Codex. The evaluation team was informed that the project conducted the second multi-stakeholder meeting in February 2019; however, its details are not available with the evaluation team.

Also, the reporting of the outputs and outcomes of this sub-goal indicates that this activity is viewed as standalone and is not aligned to its original purpose, i.e. development of consensus around Mill Codex of the key stakeholders, i.e. employer associations, trade unions and NGOs. In order to facilitate the multi-stakeholder dialogue process in an effective manner to meet its

original purpose, the project must engage with employer associations. This is also important considering the strategic shift in the project, which requires the project to get the Mill Codex approved by the employers before the roundtable with GTA in Germany.

Information and dialogue with German Textile Alliance

The project is in regular touch with the GTA and has so far organised three information meetings. The project also participated in a meeting organised by GTA in Coimbatore.

Roundtable on recruitment guidelines

The project planned for a roundtable in the beginning of the third year to reach an agreement on improved recruitment guidelines. Since the drafting of recruitment guideline got delayed, this roundtable is has been planned for the fourth year after employers approve the Mill Codex. The intended participants of this roundtable include German textile companies, TPF, trade unions and employer associations along with legal experts.

EFFECTIVENESS OF SUB-GOAL 4

A draft bill (recruitment law) for the termination of the Sumangali scheme will be discussed in the State Parliament of Tamil Nadu.

At the macro level the project aimed at developing a draft bill for its discussion in Tamil Nadu's legislative assembly and also encourage public discourse around the bill. The bill is still in its preparatory stage.

The effectiveness of strategies under this sub-goal is as follows:

Preparation of draft bill

The project extended its partnership with NLSUI to draft the anti-Sumangali law, which is still in its initial stages as the preparatory research is still being finalised.

The study contributed to development of 'the universal code on minimum standards for employment and conditions of work for recruits in textile industry' (Mill Codex).

As part of the preparation, the project conducted a rapid assessment of recruitment practices and has published a study report titled, 'A Rapid Assessment on Recruitment Process in Textile Industry in select districts of Tamil Nadu'. As reported, the study contributed to development of 'the universal code on minimum standards for employment and conditions of work for recruits in textile industry' (Mill Codex). The report maps out the recruitment practices and significantly concludes that most of the recruitment is happening through informal and indirect methods. The study also conducted a primary survey with 80 girls and women in the eight blocks of six districts in the project area, which confirms the poor working and living conditions, payments less than minimum wages and limited freedom of movement. To meet the purpose of creating evidence and informing the draft law, the research could have benefitted by having a better design, a larger sample size, clearly stating if the workers are currently in employment or are ex-workers, whether they are project beneficiaries, and map the relationship between the units and the 'labour brokers chain' in detail.

Information workshops

TPF organised 11 information workshops, seven in the first year and four in the second year, in eight districts (6 direct and 2 expanded). These workshops were attended by district officials from Child Protection Unit, Integrated Children Development Scheme, National Child Labour Project, Child Line 1098, Child Welfare Committee, Anti Human Trafficking Unit of Police department and Social Welfare department. The workshops discussed the laws protecting children and young women and the legal experts explained the recent amendments. The project also developed a book on relevant laws in Tamil (translated from English), which was shared with the participants along with other information material.

The workshops received significant coverage in the local media, which helped in disseminating the message to a large section of public. As a result of these workshops, NGOs in Erode, Dindigul and Pudukkottai developed good relationship with government departments and conducted joint programmes to stop unsafe migration of girls, ensure safety of girl child, and to prevent school dropouts. READ in Erode district was awarded a project by District Child Protection Unit to protect vulnerable tribal girls from being recruited by middlemen for the textile industries. While these workshops were certainly useful in generating an active and important debate around issues of women workers in the textile industry,

there is no evidence to suggest any official action against the perpetrators of the Sumangali system. The draft recruitment code and anti-Sumangali law was not discussed in these workshops as originally intended in the design.

Other advocacy initiatives

Apart from the planned activities, TPF carried out district and state level advocacy initiatives wherein it engaged in dialogues with other civil society led multi-stakeholder initiatives like MSI-TN, ETI's TNMSP and TNA. TPF is member of TNA and MSI-TN, but there is no evidence to suggest that TPF has discussed the Mill Codex or the draft law in these forums.

The TPF submitted its charter of demands with regard to eradication of forced labour, child labour and bonded labour situations to political parties and trade unions. TPF also reported having good relationship with some of the leading trade unions, which can be potentially helpful during the multi-stakeholder dialogue processes. However, TPF also mentioned that working with trade unions is challenging due to their political affiliations.

TPF has liaised with leading political parties, who agree that Sumangali scheme needs to be abolished. However, since these political parties are in opposition, their influence over implementation of existing laws or getting a new legislation passed in the assembly is limited. The current government denies existence of any Sumangali scheme, which can be a major stumbling block in getting the anti-Sumangali law passed. Since the project has not introduced Mill Codex or the idea of anti-Sumangali law with the political parties and employer organisations, their opinions on these policy asks is not yet ascertained.

Overall, the goal to ratify a new law appears to be unattainable due to limited scope of discussion within the economic and political setup in Tamil Nadu. Considering the technicalities involved, this is expected to be a long drawn and resource intensive strategy.

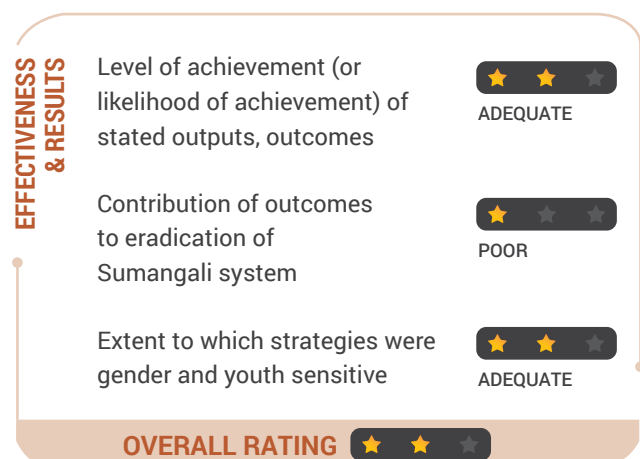
OUTCOME LEVEL RESULT

At the outcome level, the project has one result related to prevention of the girls from joining the Sumangali or other similar schemes. However, its contribution to the overall goal, i.e. eradication of exploitative systems from textile industry is limited.

Reduction of girls and women being recruited under the Sumangali system

The key outcome of this project is a significant reduction in number of girls and young women joining the Sumangali system from the project area. Although there is no project level data about the number of girls dissuaded from recruitment under Sumangali, communities and the NGO partners confirm that this result is significant. Some of the proxy indicators that explain this result are difficulty in identifying new cases of Sumangali survivors in the project area and reduction in number of vans plying in the project area to transport women workers. The trained survivors and community representatives and the NGO partners used informal methods and persuasive techniques to stop families from sending the girls to factories under the Sumangali system. The village level awareness programmes also made the girls and their caregivers aware of the deception under the Sumangali system and harsh working and living conditions in the factories.

However, the project has not achieved complete prevention of recruitment under Sumangali scheme in the project area. This is because the project did not cover all the 440 villages and also the systemic issues related to Sumangali scheme still persist. There is no change in the factory level practices, as they keep recruiting new workers from newer blocks, districts or even other states. Industry experts consulted during evaluation note that the proportion of inter-state migrant workers, both females and males, is increasing at a high rate. Relevant government officials still do not take proactive measures to prosecute violators. The survivor and community representative groups do not have the capacities to challenge the social norms related to gender, caste, etc. that perpetuate this system. At the household level, economic vulnerabilities and lack of jobs in the local economy force the families to send their girls to the factories. Therefore, the overall rating for effectiveness and results criteria is Adequate.



Efficiency

This chapter presents the evaluation findings related to implementation mechanism, tracking of results, human resource management, financial management, timeliness and appropriateness of targets, adaptive management and finally the cost effectiveness of the project.

The project had a multi-tiered project management structure with well-defined roles of project partners at the management and execution level. The project was set up on time and carried out monitoring, financial management, human resource management and reporting efficiently. The areas of improvement include monitoring of quality of processes, database management, tracking and reporting of results, timeliness of sub-goals 3 and 4 and adaptive management. The grant management by the donors was efficient, as the project did not face any challenge related to fund flows.

PROJECT MANAGEMENT SYSTEMS WERE PARTLY EFFECTIVE

The project management systems included monitoring by tdh and CARE-T's central team at Coimbatore, bi-annual and annual reporting, annual financial audits, quarterly monitoring meetings, monthly meetings and field visits. The tdh successfully provided support in linking the project with NLSIU, NIMHANS and GTA.

Regular planning and monitoring of the project: The project was efficiently planned and monitored as per the design through monthly meetings at the RRC level and quarterly meetings at the project level. tdh and CARE-T's central team regularly conducted monitoring visits to project sites. The project progress was reviewed quarterly as per the project plan and project's impact matrix.

Efficient financial management: As per the annual audited financial reports, the project's financial management was efficient as no major deviations are reported and the expenditures were made as per the donor guidelines. The project kept track of the finances closely ensuring adequate planning and review on monthly and quarterly basis. The project conducted annual financial audits in a timely manner. Internally, at the project level, the project team constituted a finance committee to keep track of expenditures in a consistent and credible manner. Further, the project also trained the partners at the RRC level to implement the donor prescribed processes.

Timely completion of activities under sub-goal 1 and delays under sub-goal 3 and 4: With regard to sub-goal 1, the project completed most of its activities in a timely

manner. However, at the level of results, i.e. outputs and outcomes, the targets are partly achieved (refer to annexure 10) as explained below in the sub-section 'appropriateness of targets'.

Under sub-goal 2, there is significant difference between the targets proposed in the proposal and the targets mentioned in the reports. This is due to misinterpretation of targets in the project proposal. Accordingly, the project has not completed the activities as per the targets mentioned in the proposal.

The activities under sub-goal 3 and 4 are significantly delayed. The delay in drafting the recruitment guideline further delayed other linked activities under the sub-goal 3 and sub-goal 4. Considering the progress made so far, project team will have to make speedy progress in the remaining period to achieve the proposed targets.

Monitoring of quality of processes and products need improvement: The project has a decentralised structure with the RRCs taking the lead in implementation, which led to variations in the execution processes. While some of these variations are desired and adequate as they respond to the needs, others impact the quality of services and project activities. For e.g. in case of psychosocial care, the batch size, delivery process of group counselling and location of training varied. Process standardisation can include development of a process manual for group, individual and family counselling sessions to ensure quality standards. A note on the survivor and activity group formation process explaining the purpose, role, structure, objective and operating mechanism could have helped in consistent performance across blocks. Further, a simple project manual explaining the different project activities, processes and terms can contribute towards a common understanding of the project strategies.

Many of the tools and products developed under the project require quality improvements. Such tools include need assessment form, pre and post counselling survey form, analysis of codes of brands and rapid recruitment assessment study. The project successfully identified weaknesses in the execution of prevention related activities under sub-goal 2; however, a stronger follow-up supported by appropriate tools was required to enhance effectiveness of the activities.

Efficient grant management: C&A Foundation conducted frequent field visits, provided constructive feedback and linked the project with other initiatives and networks at the regional and national levels. Senior management of C&A Foundation also visited the project locations.

Overall, the grant management by both BMZ and C&A Foundation was efficient, as the project did not face any challenge related to fund flows.

EFFICIENT TEAM MANAGEMENT AND CAPABLE PERSONNEL CONTRIBUTED TO RESULTS ACHIEVED UNDER THE PROJECT

The project successfully set up the project team as per the project design at all levels. The team members at the management level are engaged with the initiative since pilot phase, which contributed to low set up time. The project has a big team size of 81, which witnessed a high staff turnover of 75%. However, the project reported that the high staff turnover did not impact the project's progress. Even in case of an exigency in one of the RRCs, the project's progress was affected only for a short period of time.

The project proposed 10 full time Site Coordinators, however, only two RRCs have exclusive full time Site Coordinators. Seven Site Coordinators are organisational heads and not exclusive to the project while one position was vacant at the time of evaluation.

The project has a distinguished human right and anti-Sumangali activist as its Director and other team members at the leadership levels are experienced and capable development activists. The key strengths of the project team include community mobilisation and networking with stakeholders like NGOs, trade unions,

political parties and local level government functionaries. TPF as network partner has wide presence in most of the districts of Tamil Nadu. Further, the project invested in capacity building of project team on results based management, functioning of ICCs, gender rights, psychosocial counselling and life skill building. The combined strength of the project team significantly contributed to results attained by the project in the sub-goals 1 and 2. The areas where the project team further needs to expand its skills sets are psychosocial care, database management, reporting and documentation and multi-stakeholder dialogue processes.

TRACKING AND REPORTING OF RESULTS NEEDS IMPROVEMENT

For a project of this size with multi-layered and decentralized implementation mechanism, a strong common database management system is required to keep track of results in a credible manner. While the project team is collecting a lot of data, the data consolidation needs improvement to facilitate internal learning and credible reporting. The project requires common and standardized templates to record data in consistent and effective manner. Data digitalisation must be done for all the data collected with adequate quality control measures. For better tracking of results, data must be made available at each unit of intervention, i.e. beneficiary, village and block. Some of the issues observed related to tracking and reporting of results is in the table below:

Table 5: Issues related to reported results

Status reported as on 31 st Dec 2018	Issues
35,422 Sumangali survivors identified and needs are assessed	Physical and mental health needs of 35,422 survivors not assessed.
16,756 of survivors are stabilised emotionally through counselling and psychosocial care	<ul style="list-style-type: none"> › Emotional status of survivors not assessed before and after the psychosocial counselling. Indicators for emotional stabilisation not developed. › Actual number of survivors who attended psychosocial counselling (group counselling) is less than 16,756. RRC level data and processes show that some of the survivors have attended more than one group counselling session. The actual number survivors who attended the group counselling are not available.
10,179 girls received medical care under health camps	<ul style="list-style-type: none"> › This number includes family members and other community representatives who attended medical camps. Actual number of survivors who received medical care is less than 10,179. › Number of Sumangali survivors who attended the medical camps is not separately compiled.

Status reported as on 31 st Dec 2018	Issues
4,250 out of 16,756 about 25% of them are trained for jobs.	<ul style="list-style-type: none"> › This is the number of survivors who enrolled in training programs. Number of dropouts not recorded. › Information on number of girls who have successfully completed training is not available.
2,039 trained young women are employed in better jobs earning an income more than INR300 per day	23% of girls in employment or self-employment are earning more than INR300 per day (as per placement data of 357 survivors). Evaluation team's discussions with beneficiaries validate this proportion. Accordingly, all the 2039 beneficiaries who have started earning do not have income more than INR300 per day.
7,745 needy families have received access to social programs of the government	7,745 are the number of linkages and not the actual number of families. Some families are linked with more than one government schemes.
About 30% of the caregivers and community representatives contribute actively to the awareness in the communities and also report cases of Sumangali recruitments to the project staff through phone calls	<ul style="list-style-type: none"> › This is an estimate made by project team. › No data maintained with regard to number of recruitment cases reported by caregivers and community representatives to the project team.
The project proposal states coverage of 440 villages in the 8 districts	Number of villages covered in the project is not reported.

APPROPRIATENESS OF TARGETS

Some of the targets in the project design as per the resource allocated, i.e. human and financial are either high or unrealistic. Please refer to Annexure 10 for the difference in targets planned and achieved (up to 31st December).

- › Under sub-goal 1: The targets related to emotional stabilisation is high considering the result of the pilot phase which clearly concluded that any victim requires a minimum of four to six months to be ready for economic or educational rehabilitation. Further, the recommended holistic approach to rehabilitation is also time intensive, which must be considered while setting targets for rehabilitation services.
- › The target of complete prevention of recruitment under the Sumangali scheme in the 12 project blocks is unrealistic, considering the time and human resource available and budgets allocated. It also requires a comprehensive prevention strategy to ensure all the villages of the block are covered in the target blocks.

ADAPTIVE MANAGEMENT NEEDS IMPROVEMENT

Review meetings, feedback during monitoring visits of tdh and donors, and informal project related discussions were key mechanisms that helped the project in capturing good practices, lessons and experiences.

The project team responded positively to the feedback regarding gender equity and ensured better female representation in the project team at the field level. The project successfully identified capacity gaps of project team and community groups and took measures to strengthen them. For instance, village level survivor and activity groups were trained on gender and leadership, and project team was trained on processes of Internal Complaint Committees.

However, there are certain areas within adaptive management that need improvement. The project was able to identify good practices under different activities, however, their adoption in other blocks is not evident. For e.g. mobile tailoring unit in Tirupur block, tracking of anaemia levels in Kothagiri block, work with mills regarding ICC in Dindigul district, and case investigations in three districts.

The adaptive management by using the monitoring data or as response to contextual developments is found to be limited. The challenges related to database management and its utilization is already discussed above in this section. It is observed that the process of providing feedback and subsequent course corrective measures needs improvement. A more systematic recording of feedback and follow-up mechanism can improve the efficiency and effectiveness of the project. The project reported that it adopted formal recording of feedback over email in the third year.

With regards to key contextual changes, i.e. amendment of national child labour legislation, formation of TNA and SIMA's revision of new guidelines, the project's response should have been better.

Even in the amended child labour legislation, the national government did not raise the minimum age to 18 years. Further, the state government in Tamil Nadu denies existence of the Sumangali scheme. Considering these contextual realities, the project should have worked upon alternate policy strategy, i.e. to advocate for inclusion of textile industry in the list of hazardous industry through PIL. TPF is one of the key members of TNA and can use this platform proactively to advocate for revised recruitment guidelines and anti-Sumangali law or its provisions. Since SIMA has a new guideline, the project's analysis of SIMA 2009 guideline is irrelevant. Accordingly, the explanatory note of the Mill Codes will also need revision.

COST EFFICIENCY OF THE PROJECT

The project's performance in relation cost efficiency is satisfactory especially considering the project targets. However, if the returns are analysed from the perspective of project's impact on systemic issues, then the cost efficiency is modest.

With regard to rehabilitation under sub-goal 1, considering that the project has made long term impact on the lives

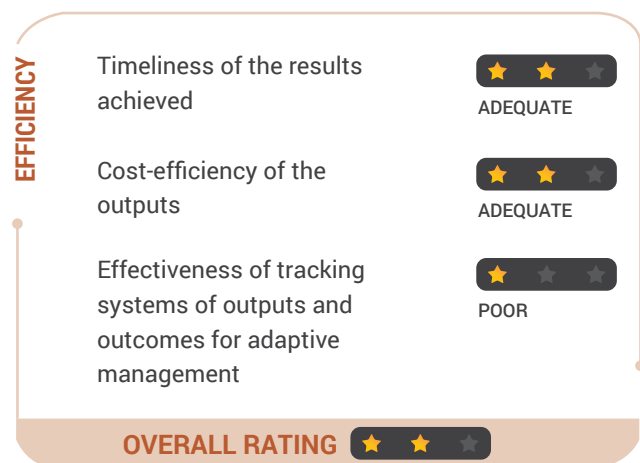
of 5,496 girls and young women, the cost per beneficiary is € 223, which is satisfactory. Similarly, as per the budget allotted to prevention strategy and the results achieved, i.e. prevention of girls entering into the Sumangali system, the cost-efficiency is satisfactory. However, the cost efficiency under sub-goals 3 and 4 is modest as the results are yet to be achieved.

Table 6: Budgetary provisions as per the key result areas

	Budget (€)	Percentage
Rehabilitation	1.026.842	50%
Prevention	120.968	6%
Mill Codex & Anti-Sumangali Law	89.414	4%
Common expenses (office expenses, staff, common activities)	807.832	40%

The cost efficiency is satisfactory also because of modest costing for personnel and activities. The unit personnel cost can be reviewed as per the living costs and the prevailing salary levels of skilled professionals. For instance, from the living costs perspective the monthly budget for tailoring teacher's salary is only € 101.93 and for community worker is just € 94.69.

Overall rating of efficiency



Even in the amended child labour legislation, the national government did not raise the minimum age to 18 years.

Further, the state government in Tamil Nadu denies existence of the Sumangali scheme.

Sustainability

This section presents the findings related to sustainability of the project, its strategies and results.

The project is successful in making sustainable changes in the lives of Sumangali survivors who attended the rehabilitation programme for a longer duration in a holistic manner. However, the community level structures formed are still in nascent stage and are unlikely to sustain themselves in absence of project's support. The results at the meso and macro levels that targeted systemic changes require long term intervention and are unlikely to be achieved during the project period.

SUSTAINABILITY OF THE REHABILITATION RESULTS

The project has made a sustainable impact in the lives of girls and young women who received a variety of rehabilitation support. These survivors show an enhanced sense of self-esteem, self-confidence and improved social skills and the agency to take decisions about their lives. These beneficiaries along with their parents are highly motivated and would continue to be ambassadors of the anti-Sumangali message even after the project period. Any other sustainable impact is not foreseen.

SUSTAINABILITY OF THE PREVENTION STRATEGIES AND RESULTS

Community level

The momentum created at the village level by sensitizing community level stakeholders to prevent recruitment under Sumangali scheme will not sustain after the project period in the absence of the project support. The community level structures, i.e. survivor groups and the stakeholders group, are in their initial stages of evolution and are still dependent on the project team and project's financial support for their regular functioning. More importantly, the capacities of these groups to raise their voice or report exploitation and demand their rights is absent. Further, the project has not tackled gender and social norms related to lack of agency among women to choose their partner, restriction of movement of women approaching marriageable age, dowry etc. that contribute to recruitment of the young women and girls under the Sumangali scheme. Sustainability potential of community

level prevention mechanisms can improve if the project creates formal mechanisms to report violations. Linking families to social programs and government schemes helps the families, however, does not improve their financial conditions significantly.

Given the context of limited livelihood opportunities, high vulnerability to economic shocks, unchanged social norms and no significant change in employment practices of employers, the impact on prevention is unlikely to last in the absence of project.

Block and district level

System strengthening and institutional mechanisms are key to sustainable change. While the project engaged with officials at the block and district levels intensively, the effort remained limited to sensitization and did not translate in concrete actions from the officials. The impact made by the project on the officials will wane unless the officials take strict action against the perpetrators.

Meso level

The draft Mill Codex, if accepted as universal code by employers and brands, can make significant contribution to eradicate exploitative working conditions in the textile industry. However, the acceptance of the code is uncertain and so its sustainability cannot be commented upon at this stage.

SUSTAINABILITY OF ENHANCED CAPACITIES OF IMPLEMENTING PARTNERS

An unintended sustainable impact of the project is capacity building of the local implementing partners and TPF. The organizations and staff members gained significant experience and expertise of working with community. These organisations under TPF will continue to work on the issue of Sumangali and exploitative working conditions in the textile industry even beyond the project period. They have an increased knowledge of codes and are part of a larger network of organisations committed to working towards eradication of exploitative working conditions. They have also developed a better understanding of risks and challenges associated with implementation, interaction with government officials and relationship building with community.

SCALABILITY AND REPLICABILITY

Project strategies that can be assessed for scalability or replication are related to rehabilitation and prevention. The project strategies with respect to recruitment code for mills and anti-Sumangali law are yet to be implemented fully and are not at the stage to discuss the issues of scalability and replicability.

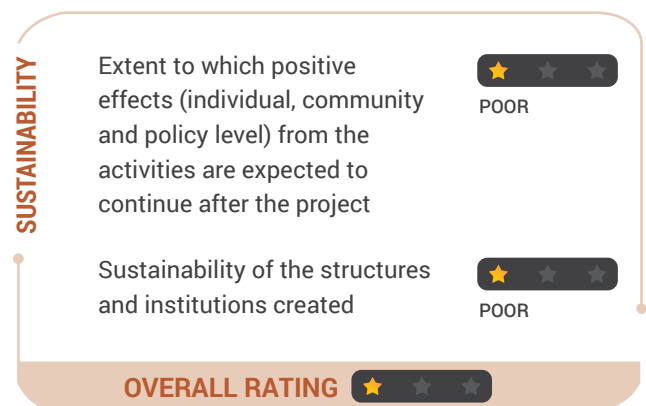
Holistic approach to rehabilitation through RRC has a potential for replication and scalability after process improvements

The project's holistic approach to rehabilitation as a comprehensive package is effective and cost-efficient in bringing about sustainable change in beneficiaries, which has value and potential for scalability. However, to ensure comprehensiveness, the rehabilitation strategy should be formulated with focus on all components, i.e. identification, need assessment, mentoring, vocational training or educational reintegration and employment, lasting for a period of 6 months to 1 year, before it is considered for replication.

Prevention strategy needs significant improvement for replication and scale-up

The prevention strategy of organizing survivors and stakeholders is still in its development stage. There is a need to define the structures and groups more clearly along with their roles and responsibilities so that it can be replicated in newer locations. To develop this into a scalable model, the prevention strategy needs to be reviewed to make it more holistic to address all the systemic issues and comprehensive to cover all the villages in a block or district. A better institutional structure with clearly established linkages between the village, block and district levels would help reduce the dependence on project staff and will enhance its sustainability potential.

Overall rating of Sustainability



“The project is successful in making sustainable changes in the lives of Sumangali survivors who attended the rehabilitation programme for a longer duration in a holistic manner. However, the community level structures formed are still in nascent stage and are unlikely to sustain themselves in absence of project’s support.

The results at the meso and macro levels that targeted systemic changes require long term intervention and are unlikely to be achieved during the project period.

Three. Lessons and Recommendations

Lessons learned

Lessons for rehabilitation of the Sumangali survivors:

A holistic approach for comprehensive rehabilitation is contingent upon continued support to beneficiaries for a period of six months to one year. In particular, the life skills approach is relevant, effective and within the capacity of project team in comparison to psychosocial support approach.

Selection of trades to provide alternate livelihoods to the beneficiaries as part of rehabilitation service must assess feasibility of the trades to provide minimum wages and decent working conditions.

Lessons for prevention of recruitment of Sumangali survivors at the micro level: Awareness generation on the negative impacts of the Sumangali system is not sufficient to eradicate the exploitative working conditions in the textile industry. The prevention strategy needs to address other systemic issues like social and gender norms, awareness among workers about their rights, recruitment practices of the factories, implementation of existing laws, and unorganised women workforce.

To ensure comprehensive coverage of the project area, the prevention strategy should be formulated at the village, block and district levels. The survivor and activity groups at village and block levels require clear understanding of their roles and responsibilities to be effective.

The local economy cannot provide fair wages and decent working conditions to women in large numbers. Accordingly, it is important to address the systemic issues related to forced labour conditions in the textile industry as it generates women employment at scale.

The strategy of sensitising government officials contributes to building of momentum, however, the

strategy alone does not lead to proactive measures by the government officials to prosecute the violators.

Lessons for development of universal code of conduct and employment guidelines for textile industry: Multi-stakeholder dialogue process requires significant investment in relationship building and lobbying from the initial stages to ensure buy-in of and consensus amongst all the key stakeholders.

Lessons for drafting of new law to eliminate Sumangali system from the textile industry: Ratification of a new law to eradicate Sumangali system requires a long term and resource intensive strategy. In comparison, evidence based policy advocacy for enforcement and amendment of laws are cost efficient and lead to speedier results. The usage of the term 'Sumangali' is not strategic because it represents only one of the many unfair recruitment and employment practices. Moreover, Sumangali system is not recognised in policy circles, which makes any dialogue with government and employers difficult.

Lessons for targeting and project management:

Inter-state migrant workforce is increasing, is most vulnerable and needs immediate attention.

Lack of explanations in the proposal document lead to misinterpretation of strategies, which impacts project's efficiency and effectiveness.

Unique identity for each beneficiary and robust database management system are required to facilitate learning, adaptive management and reporting of results in a credible manner.

Project level internal monitoring mechanism provides good opportunity for cross learning and sharing of good practices.

To generate conclusive evidence on impact of the programme, baseline and endline studies using mixed methods are required to be part of the monitoring and evaluation framework. The theory of change is a good framework to establish clear linkages between the different levels of results and their contribution to project goal.

Ratification of a new law to eradicate Sumangali system requires a long term and resource intensive strategy.

Recommendations

RECOMMENDATION FOR BMZ AND C&A FOUNDATION

1. Building upon the project experience, the donors should support the partners to develop a comprehensive package for need based holistic rehabilitation services. At the same time more focus should be given to complementary prevention strategies targeting recruitment practices and working conditions in factories. Need based holistic rehabilitation services is explained in the following sub-section, i.e. recommendation for tdh & CARE-T.
2. Facilitate synergy among partners of this project as well as among other partners like Freedom Fund and Partnership for Sustainable Textiles for mutual learning and support towards common goals.
3. Considering the investment made in developing the Mill Codex, the partner can be funded further to work towards ensuring its acceptance and use.
4. A feasibility study to improve working and living conditions of migrant workers in the south India's textile industry must be taken up to inform future scope and objectives of the project.
5. The next phase of support should be considered as extremely exploitative working conditions are still prevalent in the Tamil Nadu's textile industry. The next phase should capitalise on achievements and lessons of this phase with focus on systemic factors that lead to extremely exploitative conditions. The next phase should be approved after a sound review of project strategies and targets.
6. The project must have the provision for baseline and endline studies in the design to generate evidences on a wider scale to validate impact of the programme. The theory of change approach should be considered while formulating the new project with focus on results logic and a sound analysis of why a particular strategy is likely to work.
7. In order to address systemic issues, it is important to engage with employers in a strategic manner. This strategy formulation should be stakeholder driven and must include consultations with employer associations in the design phase. Any initiative

must consider multiple alternatives according to the context and interest levels of the employers. Few indicative strategies to incentivise the employers are:

- a. Supporting employers through their associations to address their key challenge related to labour shortage. In this direction, partnership with government or private skill development institutions along with employer associations can be established to ensure a regular supply of skilled and semi-skilled workers in the textile industry. This can be beneficial for the employers, as it would save their recruitment and training costs. For workers, it can pave a way for formalisation of the recruitment process leading to decent work. Partnership with Skill India and Sector Skills Council for Textile industry should be explored. In the private sector, partnerships with skill development organisations like Team Lease should be explored.
 - b. Another entry point to engage with employers can be through productivity enhancement model at the factory level to promote social dialogue. An example in this regard is the International Labour Organisation's (ILO) Sustaining Competitive and Responsible Enterprises (SCORE) programme for productivity enhancement along with improving working conditions.²²
 - c. Supporting employers to implement the existing laws in their factories can be another strategy. An example of this strategy is Ethical Trade Initiative's project on setting up Internal Complaints Committees (ICC) in the factories.
8. Freedom of association and collective bargaining is imperative to eradicate exploitative conditions and to promote decent work. Hence, collectivization of all categories of workers in textile industry is critical. The initiative can provide technical support to traditional or new age trade unions in expanding their membership in Tamil Nadu's textile industry. A scoping study is required to understand the current situation with regard to status of worker organisations and to design any future initiative. The scoping study must consult trade unions from both the categories, i.e. traditional and new age, to assess the feasibility of the intervention strategy.

22. Grimshaw, D., Koukiadaki, A., & Tavora, I. (2017). Social Dialogue and Economic Performance: What Matters for Business [Review]. Retrieved from https://www.ilo.org/wcmsp5/groups/public/-ed_protect/-protrav/-travail/documents/publication/wcms_571914.pdf on May 23, 2019.

"The SCORE Programme (ENTERPRISES)." *The SCORE Programme (ENTERPRISES)*, Retrieved from www.ilo.org/empent/Projects/score/lang-en/index.htm on May 23, 2019.

RECOMMENDATION FOR tdh AND CARE-T

The recommendations for tdh and CARE-T, the implementing organisations, is focused on improving the effectiveness and efficiency and is accordingly categorised as per the project strategies:

1. **Rehabilitation strategy:** The project should aim to develop a comprehensive rehabilitation strategy to provide quality rehabilitation services in a need based and holistic manner. Some of the specific recommendations are:
 - i. Rehabilitation service must follow case management approach wherein the support services are provided as per the identified needs of the survivors.
 - ii. The current need assessment tool must be revised to assess physical and mental health status of survivors at the time of identification. Relevant technical experts must approve the need assessment tool before its application.
 - iii. The project should adopt life skill building approach, instead of psychosocial counselling, as it is more relevant to the beneficiaries and is also within the delivery capacities of the field team. The life skills module can be delivered on a weekly basis over four to six months. The project should consider a need-based approach to assess if the life skills training and vocational training can be delivered simultaneously or one after the other. Appropriate tools should be developed and applied to measure the progress of the beneficiaries. The tools must essentially include trainer manual to conduct life skill trainings.
 - iv. Survivors who require clinical attention for mental health should be referred to professionals such as clinical psychologists and psychiatrists. Innovative and cost-efficient methods such as phone-based therapy can be explored for this purpose.
 - v. Selection of trades for alternate livelihood should be based on block level feasibility studies. The feasibility studies must focus on identifying trades and vocational skills based on market demand, their absorption potential, salary levels and ability to provide decent working conditions. The project's placement support must ensure issuance of contract letters detailing terms of employment and benefits.
 - vi. Adopting a centralised web-based information system to manage opportunities can strengthen the project's placement strategy. Further, partnership with local placement agencies can be explored. Since employers pay placement agencies for recruitment services, this strategy can be significantly cost effective. Finally, the project team at the RRC level should be given flexibility to innovate and implement strategies to facilitate placement of survivors.
2. **Prevention strategy:** The prevention strategy must focus on addressing systemic issues at the individual, family, societal and workplace levels to eradicate exploitative conditions in the textile industry.
 - i. The prevention strategy should continue to work on filling the information gap related to negative impact of the Sumangali system. Additionally, awareness must be created on labour rights especially on minimum wages, leaves, freedom of movement, anti sexual harassment laws, and need for collectivisation.
 - ii. The current strategy to promote two kinds of groups needs to be revisited to ensure coverage of all the villages, promotion of women and youth leadership, and a linkage with block level group using federation structure. The capacity development of the groups must focus on eradication of social norms, labour rights, and participation in decentralised self-governance mechanisms and also in policy advocacy initiatives at the meso and macro levels. The project must work out sustainability strategy of the groups in consultation with survivors and other key stakeholders.
 - iii. The prevention strategy must include engagement with factories to improve working conditions and implementation of existing laws. The engagement strategy needs to be explored in which the some of the good practices can be taken into consideration.
 - iv. The project can also advocate for setting up of Gram Panchayat level systems to prevent unsafe migration and also to raise voice against the exploitative conditions. One of the examples is to support Gram Panchayats in maintaining migration registers.

3. **Development of Mill Codex:** The project must initiate engagement with employer associations like SIMA at the earliest with the overall goal of developing universal code of recruitment in a stakeholder driven manner.
 - i. The project needs to develop human resource capacities to engage with employer associations to facilitate multi-stakeholder dialogue process either by bringing in relevant experts in the team or by tdh playing a bigger role at this level.
 - ii. With the objective of building trust, the project should also identify and disseminate good practices of recruitment and working conditions.
 - iii. The project must use existing platforms like Tamil Nadu Alliance (TNA) and Multi Stakeholder Initiative –Tamil Nadu (MSI-TN), and engage with worker organisations to create larger demand for the universal Mill Codex.
4. **Policy advocacy at the macro level:** The project should explore alternate methods of policy advocacy to address the legal loopholes in place of formulating a new law, which is a long-term and resource intensive strategy. Few alternatives to be considered are:
 - i. Advocacy for inclusion of textile industry (including spinning mills) in the list of hazardous industry through public interest litigation.
 - ii. Adopt evidence based policy advocacy strategy at the local, regional and state levels to highlight the exploitative working conditions in the textile industry. For this purpose, the project can utilise needs assessment survey data and also further collect relevant data using TPF's network of community organisations.
 - iii. Advocate for activating District Monitoring Committee and implementation of its recommendations in partnership with other stakeholders like TNA.
 - iv. Support the TNA's efforts to develop policy for women workers in textile industry government bodies. It is to be noted that TNA is working with State Commission for Women and Department of Labour to develop this policy. TPF can offer support by creating grassroot level demand for such a policy. It can further support TNA to influence the state level policy makers by providing evidence in form of data and field stories to highlight the situation of women workers.
- v. Design and implement a communications and media strategy to deliver the key messages around the negative impacts of the Sumangali system, its systemic factors and policy asks in a sustained and consistent manner.
5. **Project management:** The project management systems must focus on developing appropriate tools to efficiently monitor to facilitate internal learning, adaptive management and enhancing the effectiveness of the implementation strategies. The recommendations in this direction are:
 - i. The project should develop a manual for the project team to develop common understanding of the objectives, strategies, terminologies, processes, quality control measures, indicators and targets. This shall also contribute to standardisation of activities across blocks.
 - ii. The project must develop systems to validate the results (numbers) reported by the blocks. Further, the project must record the numbers for outcome level results, for e.g. number of girls prevented from joining.
 - iii. The project must develop web-based common database management system for standardised and credible monitoring and reporting. The project can use services of technical service providers, readily available locally at cost effective rates.
 - iv. The project must formalise the feedback mechanism as part of the monitoring system and develop follow up mechanism to monitor the status of feedback provided.
 - v. Better remuneration structure for project staff should be considered to enable the partners to hire staff with required capacity and skills.
 - vi. The project must include discussion on contextual changes and devise project's response and future strategy. The quarterly and bi-annual meetings must include discussions on good practices and their replication status.

Annexure 1: Evaluation questions

The evaluation questions are based on OECD-DAC criteria, as mentioned in the ToR and further refined after in-depth interviews with the representatives of tdh, C&A Foundation and CARE-T during evaluation's inception phase.

RELEVANCE

1. To what extent are the initiative strategies and objectives aligned to the current vision and mission of tdh, BMZ and C&A Foundation?
2. What specific, existing gaps were filled by the initiative in addressing the eradication of the exploitative conditions in the textile industry in south India? How is the project addressing root cause of Sumangali and is the project design able to address the gap where the ethical trade systems of global supply chain has limited influence?²³
3. To what extent was the initiative design and implementation appropriate in achieving the intended objectives? To what extent was the entry strategy of education relevant to addressing the systemic issues? How did the project benefit from the previous project?
4. To what extent was the initiative successful in identifying the 'most appropriate' partners with regard to their experience and expertise in order meet the intended objectives of the initiative? How is the partnership model contributing relevant to the goals of the project, specifically, what is the value add of different implementing partners?

EFFICIENCY

1. To what extent the multi-tiered implementation mechanism and other modalities efficient and appropriate to achieve the intended objectives of the project?
2. Were the programme targets achieved on time? Were the targets realistic given the scale of operations?
3. To what extent did the human (technical, programme, etc.), financial and other resources assigned to the initiative contribute to or hinder the achievement of results?

4. To what extent has the initiative been cost-effective? What has been the initiative's value for money?
5. How did the human resource and fund flows contributed to the project's progress?
6. Did the initiative track outputs and outcomes in a credible, systematic manner? If yes, how?
7. What mechanisms (formal or informal) had been put into practice to capture and use results, experiences and lessons (allowing for adaptive management)?

EFFECTIVENESS AND RESULT

1. What were the results of the initiative? To what extent and with what quality were the intended results (outputs and outcomes and their quality) achieved? And what evidence emerges with respect to effectiveness and efficiency of the project strategies:

a. Output 1:

Rehabilitation of Sumangali girls

- i. Provision of psychosocial care, health care and motivation for changing their life: Regional Resource Centres, medical camps
- ii. Skill building for better wages and livelihood: tailoring centres, other skill training, job placement and linkage with government's social support programmes.
- iii. Educational support for a good life: Child and Youth Centres, Support children to access schools.

b. Output 2:

Prevention of recruitment of Sumangali girls

- i. Public relation work: Information dissemination
- ii. Organisation and capacity building of Sumangali survivors: Self-help-groups, Anti-Sumangali Activity groups,
- iii. Sensitisation of community representatives: awareness meeting at the village level, exchange and information meetings at the block level
- iv. Case investigation: Legal support to claim compensation.
- v. Awareness at the district level: Awareness campaign

23. Based on discussions and secondary literature review, it is recognized that the social audits and codes of conduct of different global brands are not followed in the entire supply chain, as the second and third tier suppliers are not mandated by direct contracts with global brands.

**c. Output 3:
 Recruitment guidelines and Codes of Conduct
 regarding minimum labour standards.**

- i. Preparation of draft guidelines: multi-stakeholder dialogue
- ii. Final guidelines: Agreement of the stakeholders on the final guidelines
- iii. Engagement with German Textile Alliance: Information exchange and feedback mechanism

**d. Output 4:
 Draft bill to terminate Sumangali scheme**

- i. Preparatory work: Research on recruitment practices, bill drafting
 - ii. Advocacy with law makers: Meetings
 - iii. Advocacy with government and other stakeholders: Information workshop
2. To what extent did the initiative generate unintended (positive or negative) results? What results are yet to be achieved or have been under-achieved?
 3. What has been the positive and negative perceptions and evidence regarding the initiative in terms of the processes followed?
 - a. To what extent are there any early indications of changes in the lives and the future prospects for the girls?
 - b. What has been the effectiveness of providing educational support and skill building for improved livelihoods?
 - c. To what extent are there results of stakeholder sensitization and legal protection?
 4. How effectively has the initiative shifted the balance towards improved working conditions and elimination of modern-day slavery practices within the garment industry in Tamil Nadu, India? What external and internal factors as well as challenges and risks have influenced the initiative delivery, successes and failures? And why?
 5. What were the factors that supported and / or impeded the success of this project? Please delve into this question from the perspective of:

- a. Community action and resilience,
 - b. State / panchayat support,
 - c. Role of businesses,
 - d. Access to justice and
 - e. Role of other NGOs and Networks (outside of this project), other institutions at play (including business associations).
6. What is the efficiency and the effectiveness of the initiative implemented in comparison with other organisations that are implementing similar programmes in the same geography addressing the same issue? What is the extent of overlap and possibility of future cooperation with other initiatives?
 7. What are the lessons to be learned from other similar initiatives?
 8. Is the initiative replicable and scalable and what are the factors?

SUSTAINABILITY

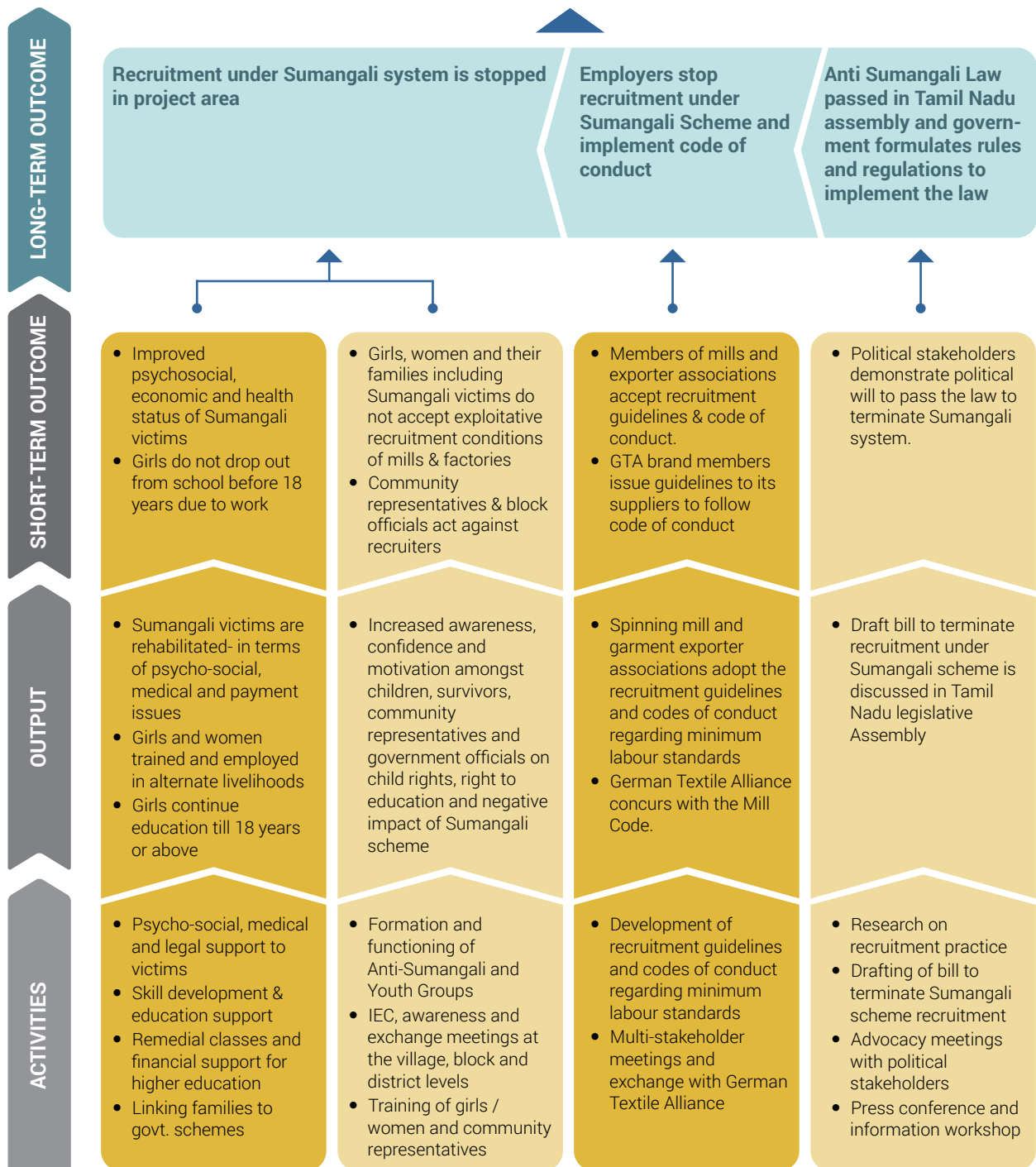
1. What are the main factors that promoted and/or reduced the sustainability and results of the initiative?
2. What were the missed opportunities? How can the initiative address gaps in the remaining years?
3. What has been the change in the enabling environment and landscape during the last two phases of implementation?
4. What are the recommendations and lessons learned that are useful for the next phase of programming (if at all) and for other stakeholders to eradicate forced and child labour?

Annexure 2: Theory of Change (Results Framework)

Theory of Change (Results Framework)



GOAL: Sumangali - Eradication of extremely exploitative working conditions in Southern India's textile industry



Annexure 3: Indicator matrix

Level of result	Targeted Results	Status of indicator
Sub-goal 1		
Outputs	<ul style="list-style-type: none"> Sumangali survivors are rehabilitated- in terms of psychosocial, medical and payment issues Girls and women trained and employed in alternate livelihoods Girls continue education till 18 years or above 	<ul style="list-style-type: none"> 5,496 emotionally stabilized and developed own life plan 20 girls referred to district medical hospital for specialized treatment, however, no evidence w.r.t results of the treatment 4,250 girls have completed vocational training and 500 are enrolled in college. 2,039 girls are earning, however, from a sample of 347 beneficiaries, only 23% of girls were earning more than INR300 per day²⁴ 746 girls were re-integrated in schools through the program, number of girls who have cleared class 12 is not clear 7,745 families are linked to government scheme. There is an issue of over-reporting as there are families linked to more than one government scheme by the program. The unique number of families supported is not maintained by the project.
Short term outcome	<ul style="list-style-type: none"> Improved psychosocial, economic and health status of Sumangali survivors Girls do not drop out from school before 18 years to work 	<ul style="list-style-type: none"> 2,039 Sumangali survivors have demonstrated better psychosocial, economic and health conditions. This is the number of girls who have started earning after attending the vocational training. There is no evidence to demonstrate the change in dropout rate of girls in project area.

24. Calculated from monthly salaries recorded in the job placement data collected from partner offices, based on 26 working days a month.

Level of result	Targeted Results	Status of indicator
Sub-goal 2		
Outputs	<ul style="list-style-type: none"> Increased awareness, confidence and motivation amongst children, survivors, community representatives and government officials on child rights, right to education and Sumangali scheme 	<ul style="list-style-type: none"> 23,921 caregivers and community representatives have increased awareness of child rights, negative impact of Sumangali scheme. 1,073 Sumangali survivors and 537 stakeholders from block level ASAG and 1,461 ASAG demonstrate having awareness of child rights and ill effects of Sumangali. There is information on the number of recruitments reported to the project team by caregivers/community representatives
Short term outcome	<ul style="list-style-type: none"> Girls, women and their families including Sumangali survivors do not accept exploitative recruitment conditions of spinning mills and garment factories Community representation and block level officials take action against recruiters 	<ul style="list-style-type: none"> There is no record of number of girls still continuing to work in Sumangali in the project area and the change in recruitment conditions. No evidence available for number of cases reported or prevented by the caregivers/community representatives. No evidence available for action taken by block level officials against recruiters.
Sub-goal 3		
Outputs	<ul style="list-style-type: none"> Spinning mill and garment exporter associations adopt the recruitment guidelines and codes of conduct regarding minimum labour standards German Textile Alliance concurs with the Mill Code. 	<ul style="list-style-type: none"> Recruitment guidelines are yet to be accepted by exporter associations. Mill code is not introduced to the GTA yet.
Short term outcome	<ul style="list-style-type: none"> Members of spinning mill and garment exporter associations accept recruitment guidelines and code of conduct. GTA brand members issue guidelines to its suppliers to follow codes of conduct. 	<ul style="list-style-type: none"> None of the association members have ratified the guideline Mill code is not introduced to the GTA yet.
Sub-goal 4		
Outputs	<ul style="list-style-type: none"> Draft bill to terminate recruitment under Sumangali scheme is discussed in Tamil Nadu legislative Assembly 	<ul style="list-style-type: none"> Formation of draft bill is in initial stages, long way before it is introduced in legislative assembly
Short term outcome	<ul style="list-style-type: none"> Political stakeholders demonstrate political will to pass the law to terminate Sumangali system. 	<ul style="list-style-type: none"> Draft law is not yet prepared.

Annexure 4: List of respondents and site visit plan

The evaluation team conducted data collection from 5th March 2019 to 16th March 2019. Following are details of activities conducted during this period and participants in the study.

Date	Activity	Partner, location
5 th March	<ul style="list-style-type: none"> RRC visit and FGD with project team (5 participants) FGD with beneficiaries (8 participants) 	CARE-T, Suler, Coimbatore
Evaluation Workshop		
6 th March	Day one: Project team (26 participants)	Coimbatore
7 th March	Day two: TPF members (18 participants)	Coimbatore
Workshop participants		
Day One: 6th March 2019: Project Team		
1.	N. Purnima	CARE-T, Suler, Computer and placement officer
2.	V. Preethi	CARE-T, Suler, Social worker
3.	S. Meena	CARE-T, Suler, Community Worker
4.	A. Sebastian Chandrashekhar	CARE-T, Budalur, Social Worker
5.	A. Vinoba Pop	CARE-T, Kothagiri, Site Coordinator
6.	L. Reena	CARE-T, Kothagiri, Computer and Placement officer
7.	A. Juliya Jerosa	CARE-T, Anamalai, Site Coordinator
8.	S. Preeja	CARE-T, Pollachi, Social Worker
9.	R. Krishnan	READ, Thalavadi, Social Worker
10.	V. Shanthi	SIMCODESS, Aathoor, Social Worker
11.	T. Viswanathan	TEST, Srivilliputhur, Community Worker
12.	J. Vijayalakshmi	TEST, Srivilliputhur, Social worker
13.	G. Ahila	ROSE, Arimalam, Social Worker
14.	P. Meenka	Hope-CRST, Vadamadurai, Social Worker
15.	C. Ramadass	Read Foundation, Director
16.	S. Rosyvineent	Read Foundation, Viralimalai Social Worker
17.	N. Palanichany	Hope-CRST, Vadamadurai, Director
18.	A. Amutha	Marialaya, Tirupur, Computer and placement officer
19.	M. Mothi Raj	CARE-T, State team, Overall Programme Coordinator
20.	P. Samson	CARE-T, State team, Counselling Coordinator
21.	K. Thamaraiselvi	CARE-T, State team, Documentation manager
22.	P. Melwyn	CARE-T, State team, State Sensitization Coordinator
23.	S.M. Prithivi Raj	CARE-T, Project Director
24.	P.E. Reji	tdh, Dy. Regional Coordinator, South Asia
25.	Priscilla Nathaniel	tdh, Program Coordinator
26.	Savi Mull	C&A Foundation

Day Two: 7th March 2019: TPF members

1.	Athappan. A.	ROSE
2.	G.F. Vituvrsam	SIMCODESS
3.	S.M. Prithiviraj	CARE-T
4.	R. Karuppsamy	READ
5.	M. Mothiraj	CARE-T
6.	P. Melwyn	CARE-T
7.	C. Ramadass	Read Foundation, TPF Convenor
8.	S. Lousdu Sagayaur	Marialaya
9.	K. Mohan Kumar	KROPE
10.	S. Muru Gesan	VCWS
11.	P.S. Bose	Green
12.	A.D. David	NET
13.	Rama Peruyac	Sinam
14.	M. Iayammal	Thaiman Trust
15.	N. Palanichany	Hoerion
16.	P.E. Reji	tdh, Dy. Regional Coordinator, South Asia
17.	Priscilla Nathaniel	tdh, Program Coordinator
18.	Savi Mull	C&A Foundation

Site visits (11th to 16th March 2019)**Coimbatore region**

Date	Activity	Partner, location
11 th March	<ul style="list-style-type: none"> • RRC visit and FGD with project team (5 participants) • 3 FGDs with beneficiaries (47 participants) • CYC visit 	Marialaya, Tirupur
12 th March	<ul style="list-style-type: none"> • RRC visit and FGD with project team (7 participants) • CYC visit • 3 FGDs with beneficiaries (36 participants) • 2 IDIs with community leaders • IDI with beneficiary • FGD with Anti- Sumangali Group (13 participants) 	CARE-T, Kothagiri, Nilgiri

13 th March	<ul style="list-style-type: none"> • IDI with representative of coaching centre • FGD with parents (8 participants) • 2 FGDs with beneficiaries (18 participants) • IDI with beneficiary • KII with Block officer for Legal aid services • KII with District Child Protection Officer, Institutional • KII with Anganwadi workers (3 participants) • KII with ASHA workers (3 participants) • KII with District Women Protection Officer • FGD with peer group 	CARE-T, Kothagiri, Nilgiri
14 th March	<ul style="list-style-type: none"> • FGD with parents (10 participants) • 3 FGD beneficiaries (34 participants) • FGD with anti-Sumangali group, (11 participants) • FGD with Sumangali Survivor Group, (10 participants) • CYC visit and discussion • FGD with peer group and Sumangali survivors who only attended group counselling, • IDI with community leader 	CARE-T, Suler, Coimbatore
15 th March	<ul style="list-style-type: none"> • KII with director and principal of nursing institute. • FGD with beneficiaries (11 participants) • FGD with Valparai project team • KII with Child Protection Officer • KII with district social defence officer • KII with project director, NCLP • KII with Secretary General, SIMA • KII with Trade Union Leader, HMS • IDI with CARE-T staff 	Coimbatore
16 th March	<ul style="list-style-type: none"> • KII with SAVE • IDI with executive director, CARE-T (project director) 	Tirupur, Coimbatore
Trichy region		
11 th March	<ul style="list-style-type: none"> • RRC visit and FGD with project team (7 participants) • FGD with beneficiaries (15 participants) • CYC visit 	Read Foundation. Viralimalai, Pudukkottai

12 th March	<ul style="list-style-type: none"> • FGD with beneficiaries (15 Participants) • FGD with community stakeholders (8 participants) • FGD with parents (6 participants) • FGD with Sumangali workers who are not part of the initiative (8 participants) • IDI with beneficiary (2 participants) 	Read Foundation, Viralimalai, Pudukkottai
13 th March	<ul style="list-style-type: none"> • RRC visit and FGD with staff (7 Participants) • 2 FGDs with beneficiaries (15 Participants) • FGD with parents (3 participants) • FGD with Sumangali workers who are not part of the initiative (5 Participants) • CYC visit • KII with Legal Cum Probation Officer, DCP • KII with District Child Protection Officer • KII with Chairperson, CWC • KII with CWC member 	Rose, Arimalam, Pudukkottai
14 th March	<ul style="list-style-type: none"> • IDI with community stakeholder • FGD with village level ASAG (6 participants) • FGD with block level ASAG (4 participants) • KII with District level officer, Anti Trafficking Child Protection Unit, DCRB (2 participants) 	Rose, Arimalam, Pudukkottai
16 th March	<ul style="list-style-type: none"> • 2 KIIs with media representative • FGD with Anti- Sumangali Activity Group (4 participants) • 2 KIIs with project staff, National Child Labour Project • KII with Chairman, Peace Trust 	Hope CRST, Vadamadurai, Dindigul

Respondent list- Stakeholder Interviews

S.No.	Name	Institution
Donors		
1.	Lee Risby	C&A Foundation - Head of Effective Philanthropy
2.	Savi Mull	C&A Foundation - Senior Evaluation Manager
3.	Anindit Roy Chowdhury	C&A Foundation - Programme Manager, Gender Justice and Human rights
4.	Jill Tucker	C&A Foundation - Head of Labour Rights Programme
5.	Barbara Koppers	tdh, Public Affairs
6.	Lena Niehaus	tdh, Co-financing Officer
7.	Ingrid Mendonca	tdh, Regional coordinator, South Asia
8.	P.E. Reji	tdh, Dy. Regional Coordinator, South Asia
9.	Priscilla Nathaniel	tdh, Program Coordinator
Implementing Partners		
1.	S.M. Prithivi Raj	CARE-T, Executive Director,
2.	R. Karuppasamy	READ, Director
3.	A. Adhappan	ROSE, Director
4.	N. Palanichany	Hope-CRST, Director
5.	C. Ramadass	Read Foundation, TPF Convenor
6.	S. Lousdu Sagayaur	Marialaya, Director
7.	Vinoba Pop	CARE-T, Site Coordinator, Kothagiri
8.	P. Samson	CARE-T, State team, Counselling Coordinator
9.	K. Thamaraiselvi	CARE-T, State team, Documentation manager
10.	P. Melwyn	CARE-T, State team, State Sensitization Coordinator
Other Stakeholders		
NGOs		
1.	Ginny Baumann	The Freedom Fund - Senior Program Officer,
2.	Dr. Bala Murugan	The Freedom Fund - Program advisor & Tamil Nadu Alliance - Member
3.	Mr.A.Aloysius	SAVE - Director
4.	Dr. J. Paul Baskar	Peace Trust – Chairman & Tamil Nadu Alliance - Convener
Media representatives		
5.	Anuradha	Thomson Reuters
6.	Gokula Bala	Journalist for local newspaper
7.	Bala Murugan	Deccan Chronicle
Employer and Employer association		
8.	Balakrishnan	Anand Kumar Mills
9.	Dr.K.Selvaraju	Secretary General, SIMA
Experts and other stakeholders		
10.	Arul Roncali	NIMHANS & ex- tdh, Program Coordinator
11.	Devaraj	Coimbatore Textile Workers Union affiliated to Hind Mazdoor Sabha

The overall coverage of the study is as follows:

Study Coverage		
Method and respondents	Study sample	Study coverage
Community		
Observation of RRC	5	6
Observation of CYC	5	6
Girls or women beneficiaries (no. of IDIs and FDGs)	10	24
Sumangali survivors who did not participate in the program	5	3
Anti-Sumangali group	5	5
Peer group (girls and women of 16-23 years age group)	5	3
Parents/caregivers of beneficiary girls	5	5
Panchayat functionaries/Community leaders	5	5
Representatives of educational institutes	4	3
Case Studies	5	5
Other Stakeholders		
Social welfare department/Anti-Human Trafficking Unit/District Child Protection Unit/Labour commissioner/NCLP	8	17
Employers	2	1
Spinning mills and textile export associations (SIMA)	2	1
NGOs with similar issue specific focus		
(Freedom Fund, SAVE, Peace Trust)	2	4
Parliamentarians- Member of Parliament (MP)/Member of Legislative Assembly (MLA)	2	0
Media representatives	2	3
Other stakeholders (NIMHANS, Trade Union, TNA etc.)	2	3
Project Team	-	19
C&A Foundation	-	4
tdh	-	5

Annexure 5: Analysis of psychosocial care methodology

GROUP COUNSELLING

All young women and girls covered in the identification (need assessment) survey are invited to participate in a half-day Group Counselling session conducted at the RRC or a central location in the block. Key components of the sessions include an introduction of participants and facilitators, discussion on the aim and purpose of the meeting, wherein the facilitator explains the meaning of counselling. The trainer facilitates a discussion regarding experiences of working in the mills or garment factories, applying counselling techniques such as opening, exploring beneficiary understanding, understanding, intervention, exploring problem, empower to create own solution taught by NIMHANS. Subsequently, the trainer provides information regarding services by CARE-T in terms of vocational training and educational support. Activities on goal setting are conducted where all the girls are encouraged to take up a path of skill development or continuing education. The entire day's schedule is packed with exercises, games and singing activities to engage the participants and to relieve their stress. Few sessions of group counselling also include components of life skill training which are relevant to the girls such as decision making, problem solving etc.

The project coordinator for victim counselling is designated for facilitating these sessions, however, in many cases, block level project team members also conducted the sessions. It is important to note that the Coordinator for victim counselling is a graduate in B.A. economics and has worked on issues of street children since year 2000, following which he joined the ROWCL project in 2011. In the absence of formal qualification as a counsellor, he was trained on counselling by professors from a leading institution on mental health in India, NIMHANS.

Group counselling sessions are held in group size ranging from 10 to 60 girls or women, the average group size is around 40. This is a lot higher than the ideal group size of counselling of 8-10 members.²⁵ Moreover, there are

Life skill sessions

Group sessions are conducted at the RRCs to impart life skills to the project beneficiaries for skilling and education re-integration. There are 10 life skills covered in the project namely- problem solving, decision making, creative thinking, critical thinking, self awareness, empathy, interpersonal relationships, effective communication, coping with stress and coping with emotions. Each session covers two of these life skills that are taught through discussions, games and activities. The site coordinator, social workers and community workers who were trained by NIMHANS conduct these sessions. There is also a handbook provided to all staff members to use as a resource material for the sessions.

Life skills training unlike counselling can be done using a variety of methodologies as they are a part of daily life and culture. The staffs was well equipped for conducting such sessions and visits to the field revealed that life skill sessions were more relatable and useful to the beneficiaries than any other psychosocial care methods.

no criteria used for the creation of groups. Technically, a pre-group screening is required to create groups with members facing similar non-pathological problems.²⁶ After the groups are formed, the facilitators along with group members should decide the number of sessions, rules for the group to follow etc.²⁷

25 Gladding, S.T. (1994). Effective group counselling. ERIC digest.

26 ibid

27 ibid

In practice, there is a lack of clarity between the numbers of sessions a beneficiary attends. Few in the project team have expressed a system where a beneficiary attends only one group counselling session and others have described a system where each beneficiary attends a set of 3-4 counselling sessions. Here, the survivors who continue to attend multiple sessions are those who enroll in either the vocational training or education support provided by the project. There are also a number of beneficiaries who do not participate in program activities after the first group counselling session.

One of the key weak areas in the group counselling process is the lack of documentation. The reports prepared for the group counselling are generic and do not provide sufficient information regarding the participants of the sessions. There is no measure of the initial or change in mental health status of those who attended the session or regarding the goal set by the participants, which are important outcome indicators of the project.

INDIVIDUAL COUNSELLING

The block level project staff approach girls or women for individual counselling who show extreme emotions or are reserved during the group counselling sessions. The selected beneficiaries are asked to visit the RRC for an individual conversation with the social worker. The purpose of the conversation i.e. individual counselling, is not mentioned to them due to the social stigma around mental health in India. Hence, the beneficiaries perceive individual counselling sessions as just conversations with the project staff, and are not aware of the project's treatment of these conversations as "counselling sessions". This can be considered against the ethics of professional counselling as it is mandatory for all attendees to sign a consent form (including confidentiality clause)²⁸. This is important in for the facilitator to stay safe under legal actions.

When counselees visit the RRC, the staff members establish a rapport with them, understand their socio-economic background, identify issues they are facing and try to arrive at solutions. Another focus of the session is also to assist the girls or women to act on their life plan and enroll in the appropriate skill building or education support programs of the project. After one

counselling session, the project team makes effort to regularly follow up with the beneficiaries of individual counselling, they meet them on multiple occasions during their engagement with the project. However the multiple sessions conducted do not focus on eradicating a single issue from the root rather, new issues are brought up and tackled in each of the sessions.

The project deploys eight techniques of counselling, namely - 1. Ventilation, 2. Observation, 3. Empathy, 4. Social Support, 5. Active Listening, 6. Problem Solving, 7. Motivation and 8. Decision making. However, there is no proper process or model of counselling followed. For example, as per Egan's Skilled helper, solution focused counselling approach there are 3 major stages to counselling, stage I, exploration - what is going on?; stage-II, challenging - what do I want instead?; and stage III, action plan - how might I achieve what I want?. This is an example of one model, there are other such models but the process is similar.

In practice, the counselling sessions are creating a space for beneficiaries to vent out their problems, which is a first step in counselling. This will definitely help beneficiaries elevate from the status quo of the problem, but elevation will not last long, if the problem is not solved the right way. This can also cause a kind of dependency on counselling staff, as the staff don't have clear boundaries²⁹ and no supervision of the work they do³⁰.

Counselling sessions are conducted by social workers, who are not qualified counsellors but have diverse educational background. They were trained by resource persons from NIMHANS, however, are not supervised by any professional psychological counsellor on a regular basis. Not having qualified professional may not cause damages but also will not help the counselees move forward. The staff's response to few of the common problems expressed by girls such as teenage romance was slightly unprofessional and it should be handled with boundaries and psycho-education. Other issues include girls and women who attend sessions in RRC or other places being cat called by neighbours, for which the RRC staff suggest them to turn a deaf ear.

Unlike in case of group counselling, there are systems in place to document important information from individual counselling sessions, however it is not up to the mark.

28 American Counseling Association. (2014). *ACA code of ethics*. Retrieved from <https://www.counseling.org/resources/aca-code-of-ethics.pdf>

29 Lymberis, M.T., () Ethical and legal issues in group psychotherapy. Retrieved from

30 American Counseling Association. (2014). *ACA code of ethics*. Retrieved from <https://www.counseling.org/resources/aca-code-of-ethics.pdf>

The staff documents socio-economic background, genograms, the dates and details of sessions conducted, techniques used issues raised and the results/solutions achieved. There is also a pre and post test taken before the beneficiary starts individual counselling and after they complete counselling sessions nearly 6 months to a year after the pre-test is done.

However, there is a need for recording the sessions more thoroughly, through written document for audio tapping is required to review and supervise the process. All important information shared by the counsees is vital to be documented to take the sessions further and facilitate the counselling process to the fullest. In the absence of supervision, there is no way of verifying that the counsellors could be motivating the beneficiaries to move away from the problem rather than tackling the root cause behind it.

FAMILY COUNSELLING

During individual counselling, in case the beneficiaries mention any issues affecting their mental status that stem from members of their family, the social workers visit their place of resident to hold family counselling sessions as well. This is also done if the family members require persuasion for letting the Sumangali workers continue their education or join programs of skill development. Family counselling³¹ show similar signs of guidance discussions rather than counselling.

CONCLUSION

Due to absence of essential elements of group and individual counselling, the evaluation team finds the project strategy more in line with guidance and mentoring through medium of "experience sharing sessions". The process is valuable to the participants as it helps women vent out emotions, share experiences, develop feelings of universality with experiences and gain hope from each other.

The women and girls attending group counselling, life skill trainings and individual counselling are also those who are engaged in the project in the long run and accessing services like education support and vocational training. Beneficiaries do express feeling more confident, having higher self-esteem, better communication and social skills, however, it is difficult to credit one of the project activities for this change. It is more of a result due to the holistic rehabilitation support provided. Hence, the outcome of the different components cannot be measured separately.

31 *ibid*, section B.4.b

Annexure 6: Case studies

Restoring one's dreams through the project

One girl in Dindigul district was sent by her parents along with her elder sister to work in a spinning mill at the age of fourteen years. She went through a difficult time in the mill, working tirelessly, without breaks and even during illnesses. Despite her elder sister working in the same factory, there was no solace. During her annual holidays of six days, she always requested her parents to not send her back to the mills. However, her parents convinced her to go back in lieu of receiving the promised amount of INR 35,000 at the end of her term. However, after working in the mill for four years, she was paid only INR 28,000, which was a huge disappointment to the entire family.

When the project team first met the girl, they found her to be going through severe depression. She was ridden with guilt for not being able to contribute to her family's income. The team convinced her to start attending some sessions at the RRC. It was her dream to complete her education, so the team supported her to reintegrate with schooling system. Today, at the age of 19, the girl is studying in grade 10th. Despite gap of many years, the project helped her cope with her studies through remedial classes and tuition support. Through a number of individual counselling sessions, the girl is now determined to excel in her studies. In this process, the project team also conducted family counselling sessions with parents. The girl is now content and optimistic about her future. She believes that with project's help she will complete her studies and get a much better job. She is also grateful to her parents for supporting her in this new journey.

Family's apprehension holding girls back from joining the project

A 20 year old woman joined the mill two years ago immediately after completing her 10th grade. She left the mill work after working for one and half years due to severe illness. While she was back at her home in district Dindigul, she got to know about the project through a village panchayat meeting. Interested in joining the program, she attended a group counselling session but wasn't able to participate in any other activities after that. She expressed her eagerness to join the programme to her family but they were apprehensive about her travelling long distances alone. The woman, even though very keen get trained in tailoring, is completely dependent on her parents and elder brother for her life's decision. She is presently at risk of returning to work in mills once she regains her health.

Regional Resource Centre in hilly district of The Nilgiris

Kothagiri is one of the five blocks of hilly district Nilgiris, which is popularly called as 'Scotland of south India' due to its weather and scenery. The district is full of tea gardens which British introduced almost a century ago.

Kothagiri is nearly 70 kilometres away from Coimbatore and many of the girls from this block were reported to be working in Coimbatore and Tirupur. CARE-T, before selecting the block, conducted a rapid survey and identified 400 girls and women working under the 'hostel scheme'. Accordingly, the block was added to the project area in 2016 for the second phase. The block consists of scheduled tribes and communities from most backward castes (MBC) and other backward caste (OBC) groups. The block also has significant proportion of Tamil repatriates from Sri Lanka who were settled by the Indian government around 35 years ago. Tea plantations is the major source of livelihood for majority of the population. While 'Badgas' are the plantation owners, households from other communities work as daily wage earners.

Being a hilly location, the population is sparse and scattered, which is a challenge as the RRC caters to nearly 55 villages in 11 Gram Panchayats. Many of the villages are hard to reach with limited or no road access.

**Regional Resource Centre
in hilly district of The
Nilgiris (Cont'd.)**

Most of the girls who migrate to work under the 'hostel scheme' are from families of Tamil repatriates and MBC category. In last two to three years, girls from tribal families have also started going after intensive efforts of garment units. It is noticed that most of the girls go to work under this scheme after completing grade 12 and few after grade 10 as well. One of the key reasons reported by the parents for sending their daughters to work is that the village gets deserted when all the women go to tea plantations to work, and the men go to work as casual labourers and they do not feel safe leaving their daughters alone at home in the village. Further, at times, they prefer sending their daughters to stay in textile industry hostels rather than hostels for college education as the textile industry keeps a restriction of movement for the girls which limits the chances of girls getting into romantic relationships with boys.

There is a stigma attached to sending their daughters to work in mills, so the parents lie to their neighbours about their daughters' situation and tell them they have gone to study or live with a relative. Hence, even when the girls return, they are asked not to share their experiences of the mills/factories with others. Secondly, at times the agents from mills come to the source locations for recruitment and assure the parents that the girls will be provided good services and will be well taken care of at the hostels. At times, they feel that since agent is taking a group of girls from the village, the girls will have a support system and will stay and work together, however, on reaching the destination area, the girls are split up to work in different mills.

The RRC is housed in a rented building, has seven rooms and comprises of seven full time project staff. Most of the staff members are working with the project since RRC's establishment in 2016. This RRC is one of few in the project that has full time site coordinator fully dedicated to the project. The RRC houses a tailoring training centre and computers for girls to come and practice. The project team comprises of dedicated social workers and has established good relationship with the beneficiaries. The outreach staff, social worker and social assistants have good rapport with the villagers in the project area. There are eight survivor groups and ten anti-Sumangali activity group. Survivors and Counselling Coordinator conducts most of the group-counselling sessions. The project has established good rapport with government departments especially child protection and women defence, legal services agency, ICDS and health. The medical camps are conducted both at the RRC and in the villages where the girls, their parents and other villagers come for diagnostic check-ups. The team maintains a handwritten register to record attendees of the medical camps. The team significantly kept track of girls who had low haemoglobin levels, provided them with nutritional advice, linked them with field level health workers and recorded the changes in the haemoglobin levels. This was identified as a good practice by the project during one of its quarterly meetings and other blocks were encouraged to follow the practice. While promoting alternate livelihood options to beneficiaries, the project promoted chocolate making group which has started production and sale of homemade chocolates. The team is making a lot of effort to maintain the data and digitalise them, however, lack professional expertise to do so. The team also helps the girls in finding employment as beautician, tailor or lab technician where the salary ranges from INR3,000 to INR6,000 per month.

The project team comments that the biggest change that they have witnessed is in the confidence level of girls, who were quite fearful in the beginning but opened up with time and were fully confident and groomed at the time of their exit. This is most satisfying for the RRC staff.

The project has now started to conduct the need identification surveys in the bordering areas of neighbouring blocks, i.e. Ooty and Cunnoor to meet the overall target.

**Creating market linkage
for the tailoring group in
Pudukkottai**

Arimalum, one of the project blocks, is economically backward as majority of the households are small and marginal farmers who depend on rain-fed agriculture. The project has so far trained 129 beneficiaries in tailoring who are now mostly self-employed. ROSE, the project partner, has created linkage with a farmers' federation who required cloth bags after the Tamil Nadu government banned plastic bags in the state. Pudukkottai Organic Farmer Producer Organization, a registered producer company having 1028 farmers as shareholders, is now sourcing cloth bags of three sizes, i.e. 1 kg, 2 kg and 5 kg. The company provides cloths for the bags and pays INR5 as stitching charges per bag. Since company requires 600 bags every day, this linkage has created direct employment for 20 girls, who earn INR150 per day by stitching 30 bags every day after putting in an effort of around five hours. This is highly significant for trained women as orders are limited and hard to come.

**Community leaders join
forces in block level Anti
Sumangali Activity Group**

An anti Sumangali activity group was recently formed with 15 members from different villages in one of the project blocks. The group members are key community level leaders or panchayat level functionaries who meet on a monthly basis. The main activities of the group include orienting community on the issues of Sumangali scheme and promote girl education at the village levels. They also guide parents to send their daughters to work in other factories with better working conditions and also link vulnerable girls, families or communities to the project. At the block level, they engage with different departments to encourage schemes related to education, protection and livelihood.

The group strongly believe in protecting girls and families from becoming victims of the Sumangali scheme. Girls drop out after class 10th or 12th to join the Sumangali scheme and face and severe health issues after working in the factories. Due to social stigma, ex-Sumangali workers face problems in finding partners for marriage and even leads to strained marital relationships. The anti-Sumangali activity group members were oriented on the legal aspects of the exploitation such as compensation benefits, on gender related issues, and child rights and child protection issues. The group members are motivated to work on increasing the awareness on labour rights before women start working in the mills. They believe that it is the responsibility of the government to ensure safe working environment for its workers and ensure that the mills follow the required norms such as regular health check ups, limited hours of work, better wages, compensation for accidents and leaves. The group believes a structured and well planned approach is required to ensure enforcement of law on the mill owners. In this respect, the group has submitted a petition to the district government and higher authorities to strengthen the Gram Sabha.

The group is in its infancy and requires an in depth understanding of their role and scope within the project. The group also require support to broaden their role for higher level of advocacy.

**Key community
stakeholder and partner
work in collaboration**

A government high school in one of the project blocks is a close associate of the project for last three years. Apart from her regular teaching work, she also takes life skills classes for adolescents. According to her, girls who drop out after grade 8th are mostly from marginalised communities. In these communities, both the parents work as daily wagers and find it safe to send their daughters to work in mills rather than leaving them alone in the village despite knowing the difficult working conditions in the mills. The teacher regularly meets these girls, their parents and other community members to prevent girls from dropping out and to persuade those who have dropped out to re-join the school and complete their education. In this endeavour, she collaborated with ROSE, the project implementing partner.

“A bright student of grade 6th dropped out to work in mills at the age of 13. Meanwhile, the teacher made repeated visits to the parents asking them to call back the girl from the mills. She once even threatened girl’s parents of police action. After working for two years, the girl returned to her home. While she was mainstreamed in school with the help of teacher, we (the project partner) provided her tutorial support to complete her education. She is writing her grade 10th examinations this year.”

Annexure 7: A note on project implementing partners

tdh Germany India Programme is a children's aid organisation working on issues of child and women right's pertaining to those who are marginalised by society. tdh's strategy is to work on initiatives that promote the improvement of socio-economic situation of children in their own environment and social context. They support programs for empowerment of children to improve their future lives. The India programmes current area of focus is on children's right to play and alternative methods of development. tdh is working in partnership with CARE-T on the eradication of worst forms of child labour and exploitative working conditions in textile industry of Tamil Nadu in South India since 2006.

CARE-T was the implementing partner for the ROWCL initiative from 2011-15 and is SEW project from 2016-19. The organisation is in existence since 2001 and is working on the issue of child and women workers in the textile industry for the past 12 years. CARE-T is a pioneer in research and advocacy on this issue. It is one of the founding members of a coalition of NGOs called Tirupur People's Forum (TPF) formed in 2006. This was one of the first network of NGOs formed to work on the issue of workers in the textile industry. While worker rights in the textile industry is the key focus area of the organisation,

it is also implementing other projects of smaller scale on education, environment conservation, natural resource management and organic farming funded by other donor agencies.

About other partners and implementation arrangement in the project

1. **CARE-T** is directly implementing the project in 4 blocks, i.e. Sular, Valparai, Kothagiri, and Budalur and indirectly in one of the blocks- Vadamadurai in Dindigul district. It also has presence in other districts of Tamil Nadu through another project on education.
2. **READ Foundation:** This organisation was registered as a trust in 1996. It has worked on the issue of child labour for 23 years and started working on the issue of Sumangali and children in the textile industry with the ROWCL project in 2011. The foundation is working in Annavasal block since its inception in 1996, where it implemented the ROWCL project, it expanded its area of work to Viralimalai only in 2016. Other than child rights, the trust also works on natural resource management, agriculture, peace building and communal harmony, and gender justice.

Table 7: Details of the partner NGOs as per blocks

Project Districts	Project block	Partner NGO	Phase	Geophysical region	Source/ Destination
Coimbatore	Sular	CARE-T	2011	Plains	S&D
Coimbatore	Valparai	CARE-T	2011	Plains	S&D
Dindigul	Vadamadurai	Hope CRST	2016	Plains	S&D
Dindigul	Aathoor	SIMCODESS	2011	Plains	S&D
Pudukkottai	Viralimalai	Read Foundation	2016	Valley/Plains	Source
Pudukkottai	Anavasal	Read Foundation	2011	Valley/Plains	Source
Pudukkottai	Arimalam	ROSE	2016	Forest	Source
Tirupur	Tirupur	Marialaya	2016	Plains	S&D
Nilgiris	Kothagiri	CARE-T	2016	Hills	Source
Virudhunagar	Srivilliputhur	TEST	2011	Hills	Source
Thanjavur	Budalur	CARE-T	2016	Hills	Source
Erode	Thalavadi	READ	2016	Hills	Source

3. **SIMCODESS:** Implementing partner in district Dindigul, Aathoor block. This district is a source and destination location of workers, hence there are many women and girls who go to work as daily labourers only. The organisation was also a partner for the ROWCL project.
4. **TEST:** Implementing partner in district situated in the southern part of Tamil Nadu, Virudhunagar is a source location for workers as there are few mills or garment factories in the district. TEST is an organisation established in 1994. It is working on the issues of workers in textile industry for 15 years. TEST was also a partner in ROWCL project. Currently, TEST is implementing multiple projects other than SEW, including the Freedom Fund project, water resource management funded by TWAD board and is an implementing agency for Childline in 3 blocks.
5. **HOPE CRST:** Implementing partner in Vadamadurai, however in the absence of FCRA, the financial operations are being carried out by CARE-T, while operational management is done by HOPE CRST. This is a source as well as destination location for mill and garment factory workers.
6. **ROSE:** Working in Pudukkottai district, Arimalam, block, ROSE was established in 1993. ROSE works on thematic areas of children and women empowerment, agriculture and conservation of natural resources. ROSE is currently implementing multiple projects funded by other donors on other thematic focus areas as well.
7. **Marialaya:** Implementing partner in district Tirupur. Marialaya is a Salesian congregation of sisters of Don Bosco. They are working for street children and women since 1990s and have presence in multiple districts in Tamil Nadu. Marialaya in Tirupur is also running a childcare institution for children and a rehabilitation home for women. SEW project is just one of the many projects being implemented by them in Tirupur.
8. **READ:** Established in 2001 as a grassroots organisation working on Dalit in Tamil Nadu. In 2005, it conducted a research on conditions of textile industry workers for Every Child foundation which marked the beginning of their work in this industry. Project implementing partner in district Erode, Thalavadi, block, READ is also implementing projects funded by other organisations including the Freedom Fund by C&A Foundation.

Annexure 8: List of documents reviewed

S.No.	Reports and documents
1	Bi-annual project monitoring reports from 2016 to 2018 <ul style="list-style-type: none"> • Monitoring report and annexure, 1 April to 31 September 2016 • Annual interim report for 1 April to 31 December 2016 • Half-yearly interim report for 1 January to 30 June 2017 • Narrative report for 1 January to 31 December 2017 • Half-yearly interim report for 1 January to 30 June 2018 • Yearly progress report for 1 January to 31 December 2018
2	SEW project financial documents <ul style="list-style-type: none"> • Project Budget for 2016-2019 • Certificate of auditor, 2018
3	ROWCL project documents: <ul style="list-style-type: none"> • End of project evaluation report, 2015 • Rusteberg, E. (2015). <i>Evaluation of the project Reduction of worst forms of child labour in textile supply chains (ROWCL) in Tamil Nadu, India.</i>
4	Project Proposals: Application to Federal Ministry of Economic Cooperation and development for funding the SEW project, 2016 Grant agreement letter and annexures from C&A Foundation to tdh, 2016
5	CARE-T documents on counselling: <ul style="list-style-type: none"> • Life skill method • Attachment theory • Stress overload • Counselling workbook • Assessment test used during individual counselling
6	Livelihood enhancement program application for young women workers of textile mills/garment industries (need assessment survey questionnaire)
7	SEW project beneficiary case studies
8	Women workers in a cage: An investigative study on Sumangali, hostel and camp labour schemes for young women workers in the Tirupur garment industry by SM Prithviraj, CARE-T published by TPF
9	Rapid assessment on status of internal migrant workers in Tirupur and Coimbatore region by SM Prithviraj, 2005
10	A rapid assessment on recruitment process in textile industry in select districts of Tamil Nadu, 2017
11	Building Sustainable Human Resources Textile Industry by SM Prithviraj, CARE-T
11	Recruitment guidelines for textile mills. Commodity 'chain': Tales from Tamil Nadu's spinning mills
12	Minimum standards for employment and conditions of work for recruits in textile industry

13	Mill Codex: Guidelines for Recruitment, employment and living conditions of hostels in Textile Mills
14	A comparison the 'Recruitment guidelines and code of discipline for women employment in textile industry' the South India Mills Association (SIMA), Coimbatore (2009) and the "Guidelines for recruitment, employment and living conditions of hostels in textile mills" developed and promoted by NLSIU, Bangalore & CARE-T, Coimbatore (2019)
15	Report on Gender sensitisation and leadership training for SEW beneficiaries by tdh
16	SEW project, Information workshop report by tdh
17	State level network Block level programmes report by TPF
18	State level network District level conferences report by TPF
19	Capacity building and leadership training report by tdh
20	Recruitment guidelines and code of discipline for women employment in textile industry by SIMA, Coimbatore 2009
21	SIMA recruitment guideline version 2.0
22	Compilation of legal documents including: <ul style="list-style-type: none"> • Madras High court judgement dated 30.04.2009 • Madras High court judgement dated 11.12.2009 • Madras High court order dated 20.07.2016 • The apprentice (amendment) act, 2014 • The child labour (prohibition and regulation) amendment act, 2016 • The sexual harassment of women at workplace (prevention, prohibition and redressal) act, 2013 • The minimum wages act, 1948 – revision of minimum wages payable to the apprentices for employment in Textile Mills
23	Aidenvironment. (December 2016). <i>Evaluation of phase I of ETI's TNMS programme</i> . Retrieved from https://www.ethicaltrade.org/sites/default/files/shared_resources/tnms_mid-term_evaluation.pdf
24	Freedom Fund. (2017). <i>Southern India Hotspot 2017 Annual Report</i> . Retrieved from https://d1r4g0yjjvcc7lx.cloudfront.net/uploads/20180514184403/S-India-2017-Annual-Report.pdf
25	Institute of Development Studies. (2016). <i>Mid-Term Review: Freedom Fund's Southern India Hotspot</i> . Retrieved from https://www.ids.ac.uk/wp-content/uploads/2019/02/Mid_term_review_of_the_Freedom_Fund_Southern_India_bonded_labour_hotspot.pdf
26	Freedom Fund. (2018). <i>What have we learned from four years of anti-slavery programming?</i>
27	Fair Wear Foundation. (2015). <i>FWF Guidance for Members: The Sumangali Scheme and India's Bonded Labour System</i> . Retrieved from https://www.fairwear.org/wp-content/uploads/2011/12/Sumangali_update_2015_2017-changes.pdf
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30	Peepercamp, M. (December 2016). <i>Fabric of Slavery: Large-scale forced (child) labour in South India's spinning mills</i> . Retrieved from http://www.indianet.nl/pdf/FabricOfSlavery.pdf

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May 23, 2019
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- 36 "The SCORE Programme (ENTERPRISES)." *The SCORE Programme (ENTERPRISES)*, www.ilo.org/empent/Projects/score/lang-en/index.htm. Retrieved May 23,2019.
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Annexure 9: Rating system

RATING SYSTEM FOR EVALUATION OF "SUMANGALI: ERADICATION OF EXTREMELY EXPLOITATIVE WORKING CONDITIONS IN SOUTHERN INDIA'S TEXTILE INDUSTRY"

As part of the external evaluation of the project, "Sumangali: Eradication of Extremely Exploitative Working Conditions in Southern India's textile Industry", the scope of work requires to rate the overall performance of the project in an objective manner. This rating system has benefitted from and aligned to ratings used in previous evaluations of the projects funded by C&A Foundation.

The rating uses three point scale, i.e. Good, Poor and Adequate for each of the evaluation criteria, i.e. relevance, efficiency, effectiveness and results, and sustainability. The rating of each of the evaluation criteria along with their description is mentioned below in the table:

In order to arrive at the ratings for each of the evaluation criteria, the evaluation will first rate the four goals separately (on each of the evaluation criteria) as per the result framework of the programme.

The four goals committed in the programme are:

1. Survivors of Sumangali put into a position to build a new future
2. Recruitment for Sumangali is stopped in 12 communities
3. Spinning mill and textile exporters in TN implement minimum labour standards and participate in a dialogue for improvement of guidelines
4. A draft bill for termination of Sumangali (recruitment law) to be discussed in parliament of Tamil Nadu (TN)

The ratings of the four goals under each evaluation criteria will then be aggregated to arrive at the project level ratings for each of the evaluation criteria. Equal weights are assigned to all the four goals.

Evaluation Criteria	Rating		
	POOR 	ADEQUATE 	GOOD 
Relevance	Initiative not relevant to and not well designed for contributing towards eradication of Sumangali in southern India's textile industry	Some components of the initiative were relevant to and appropriately designed for contributing towards eradication of Sumangali in southern India's textile industry	Initiative relevant to and well designed for contributing towards eradication of Sumangali in southern India's textile industry
Effectiveness & Results	The initiative achieved few or none of the target outputs and outcomes compared to expected results.	The initiative achieved more than 75% of the targets / outputs and outcomes compared to expected results.	The initiative achieved or exceeded 100% of the targets/ outputs as compared to expected results.
Efficiency	Insufficient results were achieved for the effort and money expended	Results achieved were commensurate with effort and money expended	Results achieved exceeded expectations for the effort and money expended
Sustainability	Initiative's impact at the individual, community and policy level will not continue to exist after program funding ends	Some of initiative's impact at the individual, community and policy level will continue to exist after program funding ends	Initiative's impact at the individual, community and policy level will continue to exist after program funding ends

In order to rate goals against each of the evaluation criteria, following parameters shall be used.

Evaluation Criteria	Parameters
Relevance	<ol style="list-style-type: none"> 1. Alignment of goal to vision and mission of stakeholders (tdh, BMZ, C&A Foundation, CARE-T and other implementing partners) 2. Alignment of goal to the needs of the targeted community 3. Validity of the project design and strategy to achieve the goal 4. Appropriateness of the partners and implementation mechanism
Effectiveness & Results	<ol style="list-style-type: none"> 1. Level of achievement (or likelihood of achievement) of stated outputs, outcomes 2. Contribution of outcomes to eradication of Sumangali system 3. Extent to which strategies were gender and youth sensitive
Efficiency	<ol style="list-style-type: none"> 1. Timeliness of the results achieved 2. Cost-efficiency of the outputs 3. Effectiveness of tracking systems of outputs and outcomes for adaptive management
Sustainability	<ol style="list-style-type: none"> 1. Extent to which positive effects (individual, community and policy level) from the activities are expected to continue after the project 2. Sustainability of the structures and institutions created

Annexure 10: Implementation status of activities and outputs

Activities/Outputs	Target ³²	Achievements reported as on 31 Dec 2018 ³³
Sub-goal 1		
Number of RRC established	12	12
Number of Sumangali survivors whose needs were assessed	24,000	35,422
Psychosocial and medical support		
- Number of survivors using RRC	19,920 (83%)	16,756
- Number of survivors stabilised emotionally	18,000 (75%)	16,756
- Number of survivors with severe psychological disturbances stabilised	480 (2%)	20 referred ³⁴
- Number of girls provided with medical care	19,920 (83%)	10,179
Education support (Skill training)		
- Tailoring	4,500	2,064
- Other skills	2,100	2,186 reported (2188 as per below)
• <i>Computer</i>	720	837 ³⁵
• <i>Beautician</i>	240	334 ³⁶
• <i>Nursing</i>	360	315 ³⁷
• <i>Fashion designing</i>		378 ³⁸
• <i>Mobile Repair</i>	180	89 ³⁹
• <i>Bank assistant (gold appraisal)</i>	120	67 ⁴⁰
• <i>Driving</i>	120	124 ⁴¹
• <i>Chocolate product</i>	-	38 ⁴²
• <i>Type writing</i>	-	6 ⁴³
• <i>Jewelry Making</i>	360	-
Job Placement		2039
Government Social Services/Family Support	6,600	7,745
Establishment of CYCs	12	16
Support program school	2,440	1,246

32 Source: Project Proposal 'Application to Federal Ministry of Economic Cooperation and development for funding the SEW project, 2016'

33 Source: Yearly progress report for 1 January to 31 December 2018

34 Source: Data shared by tdh GIP

35 Source: Annual interim report for 1 April to 31 December 2016; Narrative report for 1 January to 31 December 2017 and Yearly progress report for 1 January to 31 December 2018

36-43 ibid

Sub-goal 2

Sumangali Survivor Groups	24 groups (1200 members)	96 groups (1073 members)
Block level Anti-Sumangali Activity Groups	12 groups	48 groups
Village level Anti-Sumangali Activity Groups	-	106 groups
Multiplicator Trainings	440 persons	-
Exchange meetings at block level	240 meetings	51 meetings
- Number of block level meetings	60	12
- Number of representatives	9,600	4,824
Information meetings at block level	44 meetings	13 meetings
- Number of blocks	11	Information not available
Case Investigations	No targets	139
Case study publication	2 publications	2 publications
District level expert meetings	80 meetings	18 meetings

Sub-goal 3

Preparation of Draft for Recruitment guidelines	Improved recruitment guidelines to be drafted	Recruitment guidelines and a user-friendly Mill codex drafted
Organisation of Multi-stakeholder meetings	Comments on the draft guidelines will be taken from multiple stakeholders	Recruitment guidelines yet to be introduced employer associations
Information and dialogue with German Textile Alliance	<ul style="list-style-type: none"> Important players from the GTA support drafting and implementation of the guideline 	<ul style="list-style-type: none"> Recruitment guidelines yet to be introduced to GTA
Round table on recruitment guidelines	<ul style="list-style-type: none"> Stakeholders agree to the recruitment guideline 	<ul style="list-style-type: none"> Round table meeting planned for 2019

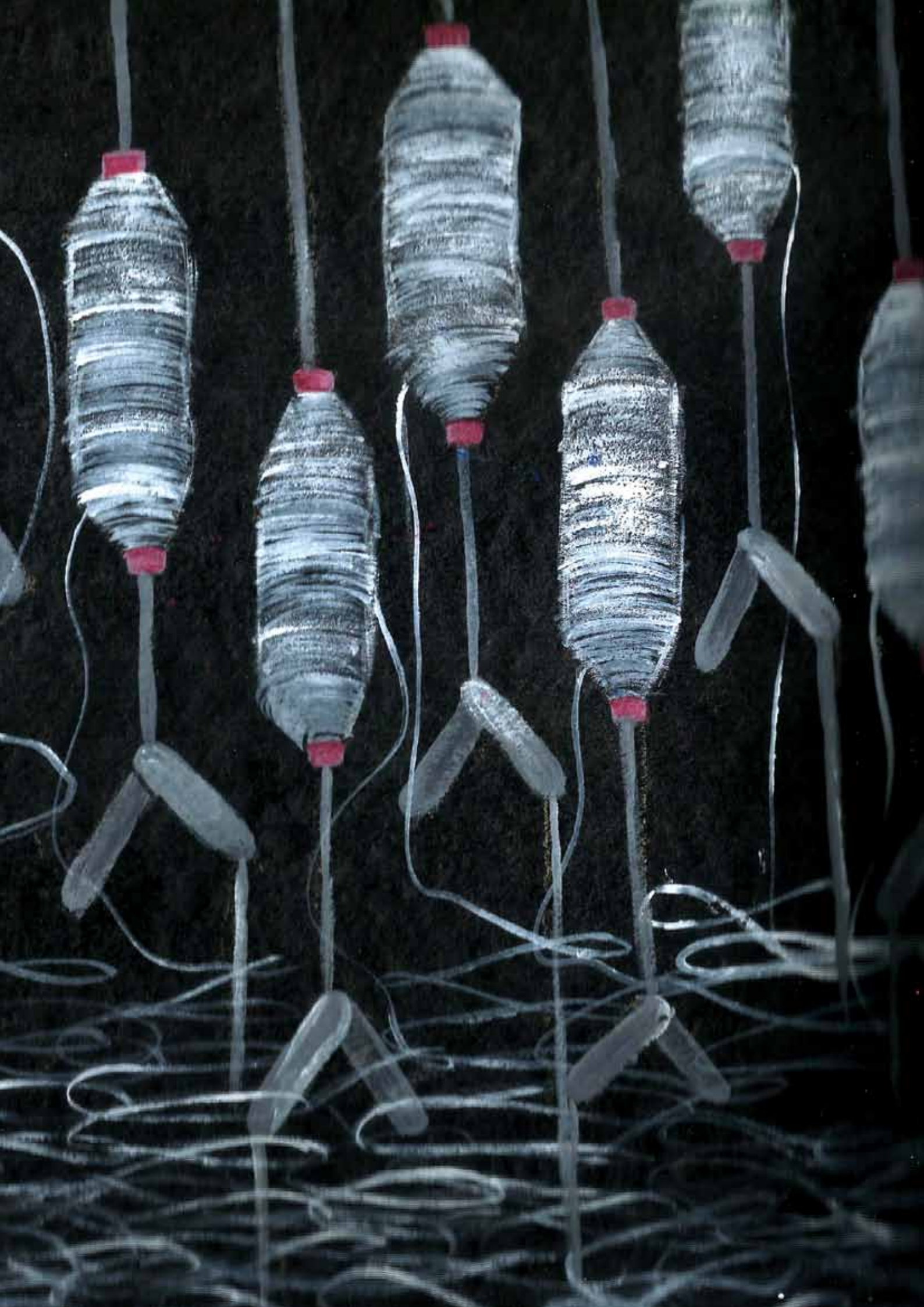
Sub-goal 4

Research on recruitment practices	<ul style="list-style-type: none"> Research to be completed in first year 	<ul style="list-style-type: none"> Research on recruitment practices completed in second year. Report on legal analysis of recruitment and employment practices yet to be finalized.
Preparation of the draft bill	<ul style="list-style-type: none"> Draft bill to be ready in the beginning of the third year along with its legal assessment Submission of draft bill and legal assessment to Home office and judicial authority in the third year 	<ul style="list-style-type: none"> Legal assessment being undertaken as preparatory study. Please refer to row above. Preparation work on draft bill initiated.

Meeting with political leaders	<ul style="list-style-type: none"> • Presentation of the draft bill to the political leaders in the beginning of the third year 	<ul style="list-style-type: none"> • No progress as the bill is still to be drafted. • One meeting with political leaders of leading opposition party in the second year led to discussion on Sumangali in the state legislative assembly.
Press conferences	<ul style="list-style-type: none"> • 4 press conferences at four different locations in the third year on the draft bill 	No progress
Information workshops	<ul style="list-style-type: none"> • 20 information workshops (5 per year at five locations) on draft bill, universal recruitment guidelines and existing laws. 	<ul style="list-style-type: none"> • 11 information workshops conducted, 7 in the second year and 4 in the third year.

NOTES:







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Report design by: clichéd who?