

Ethiopia programs strategy

Safer Migration and Child Domestic Workers programs







Ethiopia Strategy:

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June 2020

Introduction

This strategy sets out the Freedom Fund's vision for its Ethiopia hotspot¹ over the next five years. It builds on the Fund's previous work focused on promoting safer migration of Ethiopian migrant workers travelling to the Middle East for domestic work. This new strategy will expand to address children at risk of domestic servitude in Addis Ababa.

In recent years, more attention has been given to the trafficking of Ethiopians who migrate internationally in search of employment than those trafficked domestically². A high number of girls coming from rural and disadvantaged backgrounds are deceived or coerced into domestic work, which is tantamount to trafficking. Other girls may willingly enter domestic work, but their working conditions become such that they are effectively in domestic servitude. The 2020 Trafficking in Persons Report of the U.S. Department of State³ flags the lack of action taken by the Ethiopian government to address internal forms of trafficking, while recognising increased government efforts to address transnational trafficking.

The new strategy for Ethiopia will therefore have two programs: one aimed at reducing the risk of exploitation of child domestic workers, and the other aimed at reducing trafficking of Ethiopians migrating abroad. These programs focus on the most vulnerable groups in Ethiopian society - rural girls and women coming from disadvantaged backgrounds. These groups are the most likely to fall prey to exploitation and human trafficking.

The Ethiopia hotspot's two programs are:

- the Child Domestic Workers program in Addis Ababa;
- the Safer Migration program in Amhara (South Wollo, North Wollo and Kemisse) and Addis Ababa.

The launch of this strategy marks a new phase of funding from the U.S. Government with a \$7M allocation coming from the Program to End Modern Slavery (PEMS)⁴ under the Office to Monitor and Combat Trafficking in Persons at the U.S. Department of State. This sets the framework for the Ethiopia

¹ A "hotspot" is a Freedom Fund term that defines a set of initiatives delivered by frontline organisations in a geographic area known to have a high incidence of modern slavery, and which meets criteria designed to ensure that interventions are likely to result in a measurable reduction in slavery within five years of the Freedom Fund's engagement. In Ethiopia, Freedom Fund has a hotspot with two distinct programs focusing on (i) Safer migration for Ethiopian migrant domestic workers and (ii) Child domestic workers in Addis

² Population Council research - Migration and Child Domestic Work: evidence from Ethiopia, 2018.

³ TIP latest report titled 'Trafficking in Persons Report 20th edition' can be found here https://www.state.gov/wp-content/uploads/2020/06/2020-TIP-Report-Complete-062420-FINAL.pdf
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⁴ In 2017, the Office to Monitor and Combat Trafficking in Persons at the U.S. Department of State launched the Program to End Modern Slavery (PEMS) as a ground-breaking U.S. foreign assistance program aimed at supporting transformational efforts to achieve a measurable and substantial reduction of the prevalence of modern slavery – also known as human trafficking

hotspot's strategy moving forward. Further consultation and research will take place throughout the second half of 2020 and 2021, which will help to refine this strategy.

Key pillars of the strategy

1. Research & evaluation

Underpinning both programs is a commitment to understanding what the most effective strategies are to reduce exploitation and trafficking.

The first phase of the safer migration hotspot was assessed in 2016, 2017 and 2019 by the London School of Hygiene and Tropical Medicine. These studies focused on Amhara and explored the local perceptions of migration for domestic labour. The research highlighted the key factors that contribute to a safer migration experience, including skills, knowledge, interpersonal attributes and resources.

The new phase of the hotspot will start with scoping and prevalence studies to understand the extent of child domestic servitude in Addis Ababa. Traditionally, child domestic workers have been statistically invisible. They largely remain an ignored group of workers, unrecognised as workers under labour laws, and research on them is limited. This makes it challenging to understand their working and living conditions and has hindered efforts to inform policy and design good interventions. The Ethiopia hotspot, which will run up to 2025, will produce a body of data that allows for a more sophisticated understanding of the situation of child domestic workers in Ethiopia. A mid-line evaluation will also be conducted in 2022/2023 and will provide important findings to help adjust and adapt the second phase of the program in line with evidence of what works best.

Additionally, the Freedom Fund aims to set up a robust evaluation methodology for assessing the effects of interventions aimed at reducing the prevalence of child domestic servitude.

2. Safer migration program

The safer migration program strategy builds on the impact of the previous five years. Additional support and resources from the U.S. State Department's Program to End Modern Slavery is allowing the Freedom Fund to expand and build on the successes of the hotspot's first phase.

2.1 Background

There are a number of reasons that lead women to decide to migrate for employment abroad. Poverty and a search for better opportunities has meant that women have continued to migrate as domestic workers, despite knowing of extreme and widespread abuse, particularly in the Middle East.

Evidence about what works to address safer migration of domestic workers remains scarce. However, the Freedom Fund's experience has highlighted the importance of pre-departure information, skills, knowledge and strategies that can help potential migrants to reduce the risk of exploitation. Contribution to improved knowledge and practices of safer migration within communities, inclusion of returnees in engaging communities on migration risk factors, bringing government and local authorities together to support training have shown promise in the fight against human trafficking.

Most recent research has also found that *pre-departure vocational training* was a factor in reducing workers' vulnerability to forced labour. An ILO baseline study conducted in 2018, based on a large sample of respondents, found that the prevalence of forced labour drops significantly based on (i)

whether migrant workers pay recruitment fees and (ii) whether migrant workers receive pre-departure vocational training. Among workers who did receive pre-departure vocational training and who did not pay recruitment fees, there was a forced labour rate of 49% compared with the general rate of 72%. This provides some evidence about the value of making the migration system more functional, while encouraging individuals who still want to migrate to opt for the legal route.

Investing in frontline organisations is an important approach that allows community members to make informed choices about whether to migrate, the way they migrate, their destination, and the sector they work in. However, reducing the exploitation of migrant workers also requires engaging government, policy makers, and recruitment agencies to build their capacity and hold wrongdoers accountable. The hotspot will take advantage of Ethiopia's conducive environment to build the capacity of civil society organisations, including survivor led organisations and/or networks, to better advocate and influence key stakeholders.

The strategy calls for advocating for the implementation of the Ethiopian overseas employment proclamation N.923/2016, while ensuring that recruitment agencies follow a fair and transparent recruitment process and comply with the law. Other relevant proclamations like the Proclamation 1178/2020 on 'Prevention and suppression of Trafficking in persons and Smuggling of Migrants Proclamation' should also be considered.

The strategy also calls for the enforcement of penalties and prosecutions of traffickers. The Ethiopian Constitution and Criminal Code (414/2004) also have mentions of slavery and forced labour. Prosecution requires regional collaboration that goes beyond Ethiopia. The Freedom Fund will support whenever possible the government's efforts and commitment to bring justice to victims.

2.2 Program objective

This hotspot aims to prevent the exploitation of Ethiopian migrant domestic workers going to the Middle East by:

- Building community understanding of safer migration
- Improving the functioning of the migration system in Ethiopia, such as supporting government responses, promoting fair and transparent recruitment practices, and strengthening law enforcement actions
- Strengthening the capacity of civil society actors to influence and hold the government accountable
- Improving access to and quality of reintegration services for returnees.

2.3 Expected changes

 Communities and workers practice safer migration and use strategies to help prevent domestic servitude.

The Ethiopia hotspot will build on past community-level work to improve migration preparedness to reduce the risks factors related to domestic servitude. It will equip community members with the information and skills needed to make migration decisions. Beneficiaries will be supported to act on their knowledge about unsafe migration, and the program will help create social norms that support safer routes and processes. Communities will learn about the different ways to migrate, the risks of migrating to specific countries, the prevention measures to reduce the risk

of exploitation before migrating, and the skills, knowledge, inter-personal attitudes and resources that are associated with better and safer migration outcomes at destination. The emphasis will be on participatory and interactive approaches that allow for reflection and dialogue among groups most likely to migrate. Interventions should use community structures like *iddirs* which can reach out to the most at-risk groups with targeted approaches and messages. These approaches may include discussions around norms and power, which tend to create an environment of expectation that makes migration inevitable.

The Freedom Fund will consider supporting interventions to reduce the specific vulnerabilities of at-risk groups. Push factors for unsafe migration include lack of economic opportunity and livelihood income, negative gender norms, peer pressure, lack of education and risk of school dropout. Interventions that reduce these push factors are essential for behaviour change, and they offer a platform under which other targeted safer migration goals can be pursued.

 The regulatory environment for migrant workers is more protective, with recruitment agencies offering fair and transparent recruitment services and enforcement bodies taking action against recruitment agencies and others in breach of regulation.

The Ethiopia Overseas Employment Proclamation No. 923 (2016) is the main regulatory framework for the management and recruitment of migrant workers. It details a number of responsibilities and activities recruitment agencies are expected to undertake. It also details the role and responsibilities of the Ministry of Labour and Social Affairs (MOLSA), which is in charge of overseas employment. MOLSA is tasked with setting employment standards, licensing recruitment agencies, overseeing pre-departure vocational training delivered by the Technical and Vocational Education and Training (TVET) centres, and taking administrative measures against those agencies and institutions that contravene the Proclamation. Other ministries, including the Ministry of Foreign Affairs (MOFA) and the Ministry of Justice (MoJ), also play important roles in preventing and responding to servitude in destination countries.

Investing in supporting MOLSA and relevant bodies to implement and operationalise existing provisions under the Ethiopia Overseas Employment Proclamation No. 923, as well as **strengthening the migration legislation** where needed will be a key strategy to improve the functioning of the migration management framework. This will make the system work better for migrant workers and reduce the risk of exploitation.

Under this objective, engagement with MOLSA and other relevant government bodies should help to ensure that:

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- recruitment agencies follow the procedures for fair and transparent recruitment,
- the deployment of migrant workers is done within the requirements of Ethiopian law,
- there is routine inspection and oversight of recruitment agencies are regularly taking place,
- the operating procedures at different levels are improved,
- and budget allocations are made to improve prevention and respond to the needs of migrant workers.

There is also the urgent need to **strengthen recruitment agencies' capacity to be compliant** with Ethiopian law. The Freedom Fund will fund training of recruitment agencies to improve their understanding of the legal requirements around recruitment and the development of best practices towards fair and transparent recruitment. This might include activities aiming at

supporting the due diligence process for overseas employers, putting in place grievance mechanisms, having fair written contract of employment, pre-departure orientation on working environment, workers' rights and ways to report grievances once in the destination country.

The Freedom Fund's strategy will also **focus on prosecuting** recruiters who are not complying with the law or deliberately engaging in human exploitation and trafficking (proclamations No. 923 refers to penalties and prosecution, while the proclamation 1178/2020 increases efforts to investigate and prosecute traffickers who exploit victims within Ethiopia, as well as illicit labour recruiters who facilitate transport of Ethiopians to the Middle East for exploitative labour). Prosecution should be understood as any enforcement action taken against traffickers who have breached migration, recruitment and/or trafficking laws or procedures. Activities under prosecution can include training and strengthening the capacity of different enforcement bodies like the police or prosecutors. A key indicator of success will be an increase in the number of lodged cases, the number of investigations initiated, or the number of penalties dispensed.

 Civil society organisations effectively represent the voice of prospective migrants and survivors and hold the government to account for the implementation of the migration framework in Ethiopia.

The Freedom Fund's strategy will focus on **supporting civil society organisations** to influence the migration agenda in Ethiopia and allow for the **voices of migrant workers** to feed into relevant areas of policy. Whenever safe and possible, projects should aim to create the space and opportunity for returnees to report on their lived experiences to advocate for and inform interventions focusing on survivors' needs. The Freedom Fund seeks to amplify the voices of returnees and place them at the forefront of migration discussions to meaningfully **inform and influence policy changes**.

This might include providing support to CSOs to better understand the legal migration framework and how they can play a constructive role in holding the government accountable to the implementation of a functioning migration system that responds to the needs of migrant workers. This might also include strengthening the nascent network of returnees and survivors best placed to advocate for rights of victims and inform survivor prevention and response strategies.

The Freedom Fund will bring government and civil society together to allow returnees to share their expertise, needs and issues with the bodies responsible for regulating safer migration. This will be encouraged during the program's implementation.

Returnees sustainably reintegrate within Ethiopian society.

Providing quality services to returnees remains an essential pillar of the Freedom Fund's strategy. Services like shelter and psycho-social support will be supported with an emphasis on quality of care. These services enable returnees – especially victims of exploitation – to function again in society without the risk of re-victimisation.

The Freedom Fund will also focus **on long-term survivor-focused and community-based reintegration**, by improving approaches and implementing best practices.

In addition, the Freedom Fund will **invest in vocational training models** that can guarantee sustainable income to returnee migrant workers months after completion of the training itself. One of the factors that forces domestic workers to remain in exploitative situations is a lack of opportunities in their home countries. Providing viable economic alternatives to returnees will be essential to the success of this last pillar of the strategy.

3. Child domestic servitude

3.1 Background

According to ILO's latest figures, an estimated 17.2 million children globally are in paid or unpaid domestic work in the home of a third party or employer, with 11.5 million of those children estimated to be in child labour.

It is difficult to get the exact figures in Ethiopia due to challenges related to the visibility of child domestic workers, and consequently the lack of reliable data. In 2018, research by the Population Council found that 97% of child domestic workers in Addis came from poorer rural areas, with 39% of them unaccompanied migrants, putting them at high risk of trafficking and abuse. The 2019 TIP Report also refers to the difficulty of assessing the true extent of the problem, while acknowledging that there have been NGO reports of internal domestic servitude.

As per ILO definition under Convention No. 138, child labour in domestic work refers to situations where domestic work is performed (i) by children below the relevant minimum age (for light work, full-time, non-hazardous work), (ii) in hazardous conditions or (iii) in a slavery-like situation.

Children in domestic work are particularly at risk of exploitation and servitude.

Domestic work in general is undervalued and very poorly regulated. Ethiopia is no exception and has yet to ratify the ILO Convention 189 which sets the minimum standards for domestic workers. The rights of domestic workers of all ages are not enshrined in law. Traditionally, domestic workers of all ages are underpaid and overworked. This reflects the low value that society attributes to this work, which has historically been embedded in gender inequality. It also reflects the lack of recognition for domestic workers' contribution to the economy.

The issue of child domestic workers remains complex and culturally sensitive. A number of factors contribute to the problem, including the blurred relationship between the child and the employing family, the informality of the arrangement and the paternalistic notion that the child domestic worker is like any family member. Literature speaks to the widespread acceptability of child domestic work across Africa. Many countries consider child domestic work to be a protective mechanism for children, and many employers believe it is their duty to take in a child from their rural communities.

The employer is perceived as a benefactor, and child domestic work is seen as a positive work environment compared to other jobs, especially for girls. This is fundamentally rooted in gender stereotypes and the perpetuation of gender roles and responsibilities. Domestic work for girls is looked upon positively and often seen as a training for adulthood and marriage, further reinforcing in the public consciousness the idea that child domestic work is a good thing.

But this disguises a reality where very often the child is indeed **working** even if the employer is a relative. The legitimisation of the relationship between employer and child as 'adoption' takes away any

form of employer responsibility. The lack of the relationship's formality undermines the child's rights and leaves the relationship open to abuse and exploitation.

The UN Conventions on the Right of the Child, the ILO Child labour Conventions, namely Convention 138 which relates to the minimum age for admission to employment and Convention 182 on the worst forms of child labour provide the framework for ending child labour and protecting children. ILO conventions are yet to be ratified by Ethiopia and a lot of the work undertaken by child domestic workers violates the basic provisions of the UN convention on the Right of the Child, which has been ratified by Ethiopia. ILO Convention 189 also provides the framework under which children can work. Children should not be working in third party households below the general minimum age for admission to employment or work, which should not be less than the age of completion of compulsory schooling and in any case not lower than 15 years old. National laws and regulations might permit children below this minimum age to carry out 'light work' but where this is allowed, legislative provision will have to clearly limit the nature and duration of this work.

In Ethiopia, the Labour Proclamation bans any employment for children 14 years old and under, while allowing those aged 15 and over to work up to seven hours a day. However, domestic work (for adults and children) is not covered by the Labour Proclamation. Besides, working children are not aware of their rights and the legislative framework that could protect children is not being enforced. The legal system is not child friendly and leaves children highly vulnerable, with limited options to seek justice. As one former Ethiopian federal prosecutor said, "the lives of Ethiopian's domestic workers *largely depend on employers' sense of fairness*", leaving child domestic workers particularly at risk of abuse and exploitation.

Ultimately, the vulnerability of child domestic workers is grounded in the lack of a protective, regulated and enforced legal framework, and on an unchecked power imbalance between employer and child. The vulnerability of child domestic workers is also increased by their isolation and total dependency on their employer. Additionally, the efforts by the Government of Ethiopia to identify internal forced labour victims – like child domestic workers – remain inadequate as documented in the latest TIP Office human trafficking report.

Within this environment, **child migrant workers** face additional challenges and are often much worse off than local working children. Child migrant workers are at additional risks especially when they migrate without their families and when children are prevented from accessing basic services like education, healthcare and other support services. Migrant children are then at higher risk of exploitation and extremely vulnerable to child labour. A 2011 study conducted by ILO and Child Helpline in Peru, Kenya and Nepal found that child migrant workers often work longer hours, are exposed to more hazardous work, are more prone to violence and are unable to leave their employers.

3.2 Program objective

The Freedom Fund program aims to improve child domestic workers' working conditions and reduce domestic servitude of Ethiopian girls by:

- Influencing the behaviour of key stakeholders, primarily formal and informal recruiters, transporters and employers
- Improving government ability to monitor child domestic workers' conditions
- Supporting CSO advocacy capacity to improve government responsiveness and the legislative framework, including mechanisms for children's participation in advocacy work

 Improving the quality of services provided to at-risk child domestic workers and survivors, especially access to education and vocational training.

3.3 Expected changes

 Key stakeholders including communities, recruiters, transporters and employers adopt positive behaviours and actions that contribute to improving the working conditions of child domestic workers (CDW) and reduce risks of servitude.

The Freedom Fund will launch the program with a scoping study in Addis Ababa to better understand the profile and conditions of child labour in Ethiopia. The study will help frame interventions that are relevant to Ethiopia's cultural and normative context surrounding child domestic work.

Changing public attitudes and employers' behaviours are essential for improving CDW working conditions and reducing servitude. It is also important to shift perceptions of the employer as a benefactor and increase employers' understanding of their responsibilities towards the children working for them.

Recruiters play a significant role determining the employment outcome for children seeking domestic work. Recruiters need to understand the legal framework protecting children's rights and ensure that children who can work legally are doing so under certain conditions, including with limits on hours worked per day and with access to basic education. Increased awareness about protection mechanisms against abusive working conditions can help to prevent and/or abuse. In addition, the Freedom Fund will **work specifically with transport workers** who come across many migrant child workers. Transport workers, if properly trained, can play an important role in identifying isolated children and refer them to relevant services.

Engaging employers and incentivising them to improve children's working conditions is a key strategy towards reducing servitude. This requires persistence, effective and creative strategies to nurture the goodwill of employers and access to child domestic workers. For example, it is better to engage employers by highlighting the value of education and recreational time for CDWs rather than taking a purely punitive approach. The Freedom Fund will be commissioning a behaviour change campaign to run in parallel with sub-awardees' interventions to engage employers.

 Improved monitoring of CDW working conditions and increased sanctions enforced against exploitative recruiters and/or employers.

Engaging law enforcement is essential to ensure that exploitative recruiters and employers are fined and/or prosecuted.

Efforts to curb illegal activities will require **enforcement bodies and labour inspection services in particular, to better monitor, coordinate and oversee** the sector so as to ensure rule of law.

The Freedom Fund aims to support **capacity building** of law enforcement and relevant government bodies - like **the police**, **child protection unit**, **prosecutors and social affairs officials** - to better understand the legal framework as it relates to child domestic work abuses including common breaches of labour and anti-trafficking laws relevant to child domestic work.

Training needs to lead to an **increased scrutiny and monitoring** of the working conditions of child domestic workers and an **increase in the number of cases identified and lodged** with relevant enforcement officials.

Alongside building capacity of government bodies, the strategy will also **look at prosecuting** recruiters and employers who break the law. The Freedom Fund will fund the following activities under this area of change: training relevant stakeholders, establishing accessible complaint mechanisms for CDW, prompting the investigation of complaints and prosecuting exploitative employers and traffickers.

 CSOs effectively advocate for better working conditions for CDWs and the government adopts improved conventions/laws and/or systems/procedures to better protect children from exploitation in domestic work.

It is essential to recognise that child domestic work requires regulation and oversight. The fact that Ethiopia has still not ratified ILO Convention 189 remains a barrier to progressing the cause of domestic workers in general. Without labour rights, child domestic workers are further hidden, unprotected and exploited in secrecy. This remains a major challenge to tackling servitude.

Child domestic workers who can work legally must also be provided with decent working conditions and access to education. The inception study and prevalence baseline of domestic workers to be conducted by the Freedom Fund in partnership with the Population Council in 2020 will provide valuable inputs and findings that will inform our advocacy efforts.

The **voices of children** need to be central in this work. The Freedom Fund wants to provide the space for child domestic workers to inform the advocacy work to be carried forward under this strategy. It is important to recognise the value of **child domestic workers' participation** and ensure that they are **consulted** so that they **shape the decision-making processes** that impact their lives. Interventions should allow for consultation with child domestic workers throughout the program implementation.

The Freedom Fund will also consider **strengthening the organisation and collective bargaining power of child domestic workers**, building on what might already exists to amplify their voices. This should link with and feed into the advocacy efforts led by CSOs.

Spaces for civil society actors to influence and hold the government accountable have historically been limited in Ethiopia. The Freedom Fund will support a **rights-based approach** to advocating for better working conditions for children, which may be a new area of work for a number of frontline organisations and local civil society actors.

The Freedom Fund will fund organisations that can advance the rights of CDWs and advocate for better protection and responses. Indicators of success will include government responsiveness to CSOs' demand for legislative and/or systems changes.

It may be useful to explore new partnerships with trade union movements, for example, which have traditionally played a key role in advocating for the protection and recognition of domestic workers' rights in a number of countries. Those strategic collaborations could help advance the cause of child domestic workers, which remains invisible and largely unaddressed by the government.

 Child survivors and children at risk of servitude have improved education and life skills, and child survivors can sustainably reintegrate into the community.

Frontline organisations are best placed to reach child domestic workers and provide essential services to exploited children. Comprehensive **reintegration services** are needed to respond to the immediate and long-term needs of child survivors. These services include **shelter**, **health**, **legal**, **trauma and counselling support**; and **education and vocational training**. Services should be child-centred and trauma-informed. The Freedom Fund will invest in improving the quality of reintegration services.

Whenever possible, the reintegration approach should reunite the child with his family and provide the necessary support for the child to remain with his family.

In addition, the Freedom Fund will focus on providing access to education and vocational training to child survivors and those at risk of servitude.

Alternative learning programs that work for at-risk children are essential to guarantee their right to education. Education programs need to consider both pedagogic content and the flexibility of delivery. The content might incorporate topics relevant to CDWs not normally included in the mainstream curriculum. Access to high-quality education that is relevant to CDWs is paramount.

In addition, central to the Freedom Fund's approach to rehabilitating child survivors is vocational training models that provide them with alternative livelihood opportunities. Vocational training should focus on building skills that will allow domestic workers to access and secure jobs available in the local labour market. For children under the minimum age for work, innovative solutions should be sought to support their development.

Cross cutting issues

Gender discrimination is a leading cause of child domestic labour. Traditional gender roles and negative social norms sustain gender inequality and are part of a system that undervalues girls and domestic work. Girls are often perceived as a 'bad' investment and in communities facing hardship and poverty, girls will be the first ones to leave school and find work. Child domestic work is an extension of traditionally constructed roles, and the high number of girls in child domestic labour as reflects this inequality.

In addition to gender, it is important to look at other vulnerability factors including **ethnic identity**, **disability** and any other relevant factors that might present an additional level of exclusion and discrimination. Being aware of and having a better understanding of how gender and diversity impact vulnerabilities of migrant domestic workers is important in that it allows for a better response to those differentiated needs programmatically and informs specific advocacy asks.

In regard to safer migration, gender also impacts the choices and decisions of when and why women **migrate**. It is not uncommon for girls and women to be forced to migrate through peer and family pressure. Women traditionally have less power over those decisions. In circumstances where women

have less agency and autonomy, this can be the difference between forced and voluntary migration (ODI 'Women on the move').

Women are also generally more vulnerable when migrating, especially if they are young and uneducated. The intersectionality of a number of factors increases the vulnerability of female migrants, putting them at greater risk of exploitation and trafficking (UNFPA, 2015)⁵.

Considering how gender and diverse identity can exacerbate risk factors is important in nuancing how we design intervention and conduct our advocacy. This will also require our monitoring and evaluation system to collect disaggregated data based on age, gender and any other relevant diversity characteristic so we can have a more nuanced analysis to inform our program and advocacy work as relevant.

The voice of survivors remains a core principle of the Freedom Fund's Ethiopia programs, and we will ensure that mechanisms are in place for survivors to influence the delivery of the Ethiopia hotspot.

Safeguarding

Safeguarding will be built into the delivery of the hotspot's interventions and included as part of the organisational support to partners. The Freedom Fund has a zero-tolerance approach to bullying, harassment, sexual exploitation and abuse, and all decisions and actions will be underlined by the 'do no harm' principle, prioritising the safety and well-being of all those connected to our work.

Organisationally, the Freedom Fund has policies in place to safeguard the welfare of people who come into contact with the organisation, particularly those involved in the delivery or receipt of services. We will ensure that these policies are implemented at program level and require that all downstream partners in Ethiopia have safeguarding policies in place.

Programmatically, the Freedom Fund will first assess any safeguarding gaps at partner level and will work with partners to improve how they prevent and respond to safeguarding issues. This will be included in the partners' capacity building plan. We recognise that the nature of the work we do fosters unequal power balance between NGO workers and communities, increasing chances of harm. The Freedom Fund will work with partners to identify safeguarding risks and support partners with mitigation strategies.

Where needed, the Freedom Fund will contribute to training partners' staff and opening spaces for discussion and reflection on safeguarding and power related issues. The Freedom Fund will also ensure that feedback and reporting mechanisms are built into programs and are accessible to and tailored for the communities we serve and work with. These internal complaints handling procedures will be regularly reviewed (through monitoring visits) to ensure that policies are implemented, and complaints can still be received from program participants, channelled to appropriate staff members for response. Should investigation support be required, we will ensure that partners receive the necessary support and that complaints and referral systems are confidential, survivor-centred and secure.

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⁵ This is not specific to domestic workers migrating to the Gulf. Some evidences suggests that reducing individual vulnerability factors does not reduce female migrants' risk due to the Kafala system and the power differential that exist in destination countries.

At the community level, the Freedom Fund will support partners to increase community participation and cascade safeguarding awareness to program participants on acceptable/unacceptable behaviours. We will ensure that local referral pathways and survivor services (child protection, gender-based violence services) are available for community members.

Monitoring of safeguarding systems will be included as part of our program for accountability and learning purposes, with the aim to improve the way the Freedom Fund and partners approach and address safeguarding in Ethiopia.