3. Independence and Impartiality in Conducting Evaluations

Principles and Norms

Independence and Impartiality as a Prerequisite for Credibility of Evaluation

3.1 To ensure its credibility, the evaluation process should be independent from any process involving program policy making, management, or activity implementation, as well as impartial. Impartiality is the absence of bias in due process, in the scope and methodology, and in considering and presenting achievements and challenges. The principle of impartiality applies to all members of the governing body, other donors and partners, management, beneficiaries, and the evaluation team. And the requirements for independence and impartiality are present at all stages of the evaluation process, including planning, budgeting and financing, formulation of mandate and scope, drafting of TOR, selection and approval of evaluation teams, conduct of the evaluation, formulation of findings and recommendations, and review and finalization of the report (and other products arising from the evaluation).

Elaborates on and applies DAC Principles III and VI and UNEG Norm 5 to GRPPs

3.2 A well-defined policy on monitoring and evaluation should be established during the setting up of the program to systematize the evaluation function and to ensure that these requirements are met. The policy should also provide for adequate budgets and funding for evaluations which are separate from regular program management funds. (See also paragraphs 2.3–2.5.) The requirements for independence and impartiality are particularly important for GRPPs, since the majority of programs are housed in (or hosted by) one of the partner organizations, and the program staff may be formally employed by that organization. Independence and impartiality are thus required to guard against bias and ensure that the views of all stakeholders are taken into account. While independence is essential for credibility, it is not a guarantee of a quality evaluation product.

Organizational Independence

3.3 "The evaluation function has to be located independently from the other management functions so that it is free from undue influence and so that unbiased and transparent reporting is assured." Accordingly, the members of an evaluation unit or team should not have been directly responsible for setting the policy, design, or overall management of the program, nor expect to be in the near future. Members of an evaluation unit or team evaluating a GRPP should report to a unit separate from program management. This would nor-

Elaborates on and applies to GRPPs, UNEG Norm 6, paras. 6.1 and 6.3, and ECG Template for Assessing the Independence of Evaluation Organizations

mally be the commissioner of the evaluation, usually the governing body.[22] Members of the unit or team should be insulated from political pressures from either donors or beneficiary groups and should not participate in political activities that could affect independence.

3.4 The larger GRPPs may set up and finance separate internal evaluation units.[23] To preserve the independence of these units, they should report directly to the governing body, not line management. To give credence to the evaluation function, the head of the unit should be sufficiently high in rank.

3.5 The majority of GRPPs rely on teams of external consultants for periodic evaluation work. Ideally, the governing body, which is separate from program management, should commission the evaluation, approve the TOR, select the team, and ultimately approve the evaluation report in order to ensure ownership of the findings and follow-up. However, it may not be feasible for the governing body to actively ***manage*** the evaluation process, or for the entire governing body to review the evaluation in detail, since the governing body may have limited time and evaluation expertise. In these cases, the governing body may entrust these functions to a subcommittee on oversight and evaluation in order to preserve the principle of independence. The governing body should ratify the composition of such a subcommittee, which would ideally have representation from each of the different categories of stakeholders on the governing body. It might also include external members with evaluation expertise — from outside both the program and the governing body.[24]

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22. In some cases, the evaluation team has reported to host organizations. This is a second-best solution, since the host organization is only one of the partners on the governing body to which the program is accountable. When the host organization bears too much responsibility for the evaluation, this may reduce the incentive for other partners to participate fully and effectively, or the ability of the host organization to look at the weaknesses of the program objectively. (See also paragraph 12.27.)

23. This is the case with the Global Environment Facility. Where there is a separate evaluation unit, an additional requirement for ensuring independence is that unit staff are protected by a personnel system in which compensation, training, tenure, and advancement are based on merit, and where budgetary resources are determined in accordance with a clear policy parameter. (See the ECG Template for Assessing the Independence of Evaluation Organizations.)

24. For example, expertise could be drawn from the evaluation units of one or more of the partner organizations, as long as that unit is independent of their line management, and as long as staff who participate in the evaluation of a GRPP do not subsequently participate in reviews or meta-evaluations of this particular evaluation.

3.6 For small GRPPs that do not have the resources to establish a formal oversight subcommittee, a less structured peer review or advisory panel may be a lower-cost alternative. At a minimum, such an external panel should have at least one member with adequate stature and evaluation expertise to ensure impartiality. Panel membership could be voluntary, with members drawn from the academic and research communities.

Behavioral Independence and Protection from Interference

3.7 In addition to organizational independence, behavioral independence must be assured. For large GRPPs with internal evaluation units, whether or not they report to line management, it is advisable to have an external peer review process. This could involve an evaluator from a peer organization who would be able to provide impartial comments and judgments with respect to the process and the evaluation findings.

Based on UNEG Norm 6, paras. 6.4 and 6.5, ECG Template for Assessing the Independence of Evaluation Organizations, and GEF Policy, section 3.3

3.8 The evaluation team, whether internal or external, should be able to work freely and without interference. It should be assured of cooperation and access to all relevant information. Team members should be able to express their views in a free manner. Vested interests on the part of either the program management and commissioners of evaluations or the evaluation team should not be allowed to interfere with the conditions for an impartial and independent evaluation. Provisions for phased payments for external consultants need to be accompanied by assurances that review of interim products for payment are based on an objective confirmation of delivery of expected products, rather than findings.

Avoidance of Conflicts of Interest [25]

3.9 Any conflict of interest should be addressed openly and honestly at any stage of the evaluation process at which it arises, so that it does not undermine the evaluation outcome. For a large GRPP with an internal evaluation unit, where there is a "revolving door" practice within the organization (that is, evaluation staff have the opportunity to move into positions within program operations, and vice versa), steps should be taken to minimize potential conflicts of interest.[26]

Elaborates on DAC Standard 6.1, UNEG Standards 2.1 and 3.15, paras. 5 and 34, and ECG Template for Assessing the Independence of Evaluation Organizations

25. This section has been placed under the heading of ***principles and norms*** even though it draws primarily on existing standards, since avoiding conflicts of interest is an important factor in determining the degree of independence.

26. For instance, incoming staff (to the evaluation unit) should declare potential conflicts of interest if they are assigned to an activity in which they had prior involvement. Outgoing staff should not be transferred — for a minimum period of, say, five years — to activities they have previously evaluated in order to reduce the likelihood for partiality when an activity being evaluated presents opportunities for future job placements/advancements.

3.10 Evaluators, both internal and external, should declare any conflict of interest to the commissioners before embarking on an evaluation project, and at any point where such a conflict occurs. Evaluators should also report — to those who commissioned or are managing the evaluation — any conflict of interest that they discover on the part of other participants in the evaluation, such as stakeholders consulted. If a potential conflict of interest arises, and if the managers of the evaluation identify and/or accept special means to diminish its implications for independence and impartiality, both the initial conflict and the actions taken should be disclosed to the governing body and the program management. As a general rule, conflicts of interests and how they were dealt with should be disclosed in the final report.[27]

The Need for Balance

Based on DAC Principle VI and GEF Policy, Section 3.3, para. 62b

3.11 The need for impartiality and for the absence of bias requires that evaluations give a comprehensive and balanced presentation of the strengths and weaknesses of the program being evaluated. To the extent possible, the evaluation should reflect the views of all partners and participants — including donors, implementers, and beneficiaries — regarding the relevance and effectiveness of the activities being evaluated. When interested parties have different views, these should be reflected in the evaluation analysis and reporting.

Standards and Guidelines

Special Considerations in Ensuring Independence and Impartiality

Applies DAC Principle III, paras. 15 and 16, to GRPPs

3.12 For large GRPPs with internal evaluation units, it has been argued that certain ways of organizing the evaluation function might strengthen independence and impartiality, but weaken the potential linkage between evaluation findings and follow-up decisions. If some evaluation functions must be attached to line management, the staff exercising such functions should report to a sufficiently high level of the management structure, or to a management committee, to help avoid compromising the independence of the evaluation process and its results.

3.13 In GRPPs where the provision for financing of evaluations has not yet been systematized, one donor partner or group of donor partners

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27. Members of GRPP evaluation teams should not be currently employed by any of the governing partners, except by one of their evaluation units if this unit is independent of their line management. If an evaluation team, after being selected, recruits a team member who is an employee or consultant of one of the governing partners, the potential for conflict of interest should be carefully considered. One result might be that the individual serves as a resource person, as opposed to a fully independent member of the core evaluation team.

has often paid for the evaluation directly. In these cases, in order to have a balanced and unbiased evaluation product that will have ownership by the governing body and broader stakeholders, care should be taken to ensure that the financiers do not have undue influence over the evaluation process (including the drafting of the TOR and the selection of consultants). Regardless of the funding source, the procedures described in paragraphs 3.5 and 3.6 of using an oversight committee or an external panel endorsed by the governing body should be followed.

3.14 Given that GRPPs are a fairly new but growing phenomenon, the pool of evaluation candidates with the experience and technical knowledge required to evaluate the program may be small, and the only candidates with the necessary skills may have had prior involvement with the program in question. But hiring such candidates may pose a conflict of interest and compromise the independence of the evaluation. (See paragraphs 7.15 and 7.16 on measures to prevent or mitigate such a situation.)

Review of Draft Evaluation Reports

3.15 To improve the probability of behavioral independence and protection from interference, the governing body and the program management should agree early in the program on the procedures for reviewing the draft evaluation report. It is highly recommended that these procedures be uniform for each evaluation and laid out in advance in an evaluation policy. (See paragraphs 2.4 and 3.1.) Or they could be allowed to evolve, for instance, as the governing body gains experience working with the management team. In either case, the agreed-upon procedures should be stated in the evaluation TOR. (See also paragraph 16.4.)

3.16 To ensure organizational and behavioral independence, the evaluation team should report to the governing body (or to an oversight committee or external panel, as discussed in paragraphs 3.5 and 3.6). The management of the program should also be given the opportunity to review the draft evaluation report in order to correct any factual errors and to comment on the findings and recommendations. But this should be done in such a way that maintains the behavioral independence of the evaluation team and provides for transparency (to the governing body) regarding any changes that management proposes (Box 1). The evaluation team must have the ability to express its findings without undue interference, while providing for quality assurance and promoting efficient, open discussion. In all cases, the evaluation team must retain the discretion to accept or reject any of the changes that management proposes. Under no circumstances, should management be perceived as or be allowed to "clear" the evaluation report, or impose any amendments on it.[28]

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28. This having been said, the evaluation team has the strong incentive, for its own credibility, to correct all errors of fact or interpretation in the report.

Box 1. Possible Alternatives for Reviewing the Draft Evaluation Report

- Provide the draft first to the commissioner of the evaluation for comment. This is usually the governing body, or a subcommittee thereof. The report may also be provided to any technical advisory committee at the same time, or shortly thereafter. Under this alternative, management would only receive the draft report after the commissioner of the evaluation has had a chance to comment.
- Provide the draft to the governing body and management at the same time. Then the governing body can choose to read the first draft at this stage or wait until management has reviewed it and provided comments and/or corrections. But this procedure may stretch the capacity of the governing body, whose members may feel that they are getting more information than they need. And the evaluation team may find it confusing to receive comments (possibly conflicting) from both the governing body and management at the same time.
- Provide the draft to management first, and have management copy their comments to the governing body. After reading management's comments, the governing body may request a copy of the first draft of the evaluation if they so desire, and they are free to comment from that point on. In this case, the team can manage comments in sequence.
- Provide the draft to management first and let the governing body know that management has provided comments to the evaluation team. Also let the governing body know that both the first draft and management comments are available on request. In this case, transparency is on demand.

Description of Degree of Independence in Evaluation Reports

Based on DAC Standards 6.1 and 6.2

3.17 The evaluation report should indicate the degree of the independence of the evaluators from the policy, operations, and management functions of the commissioners, implementers, and beneficiary groups. It should also indicate the level of transparency and impartiality observed in the commissioning, contracting, definition of scope of work, and selection of evaluators. Conflicts of interest and the ways in which they were dealt with should be addressed openly and honestly. It would also be good practice for the evaluation team, whether internal or external, to report on pressures or obstructions encountered during the evaluation process that could have affected — or did affect — their independence or objectivity.[29] Some of the above information would come from the commissioners of the evaluation, and some from the evaluation team. (See also paragraphs 5.7 and 5.8, and Chapter 17, Final Reports and Other Evaluation Products.)

29. If it were to become common practice that evaluators report on such pressures encountered during the course of their work to their own community of peers (such as a professional network of evaluators), the program and its constituents would be less inclined to exert such pressures.