National Evaluation Policy Framework

23 November 2011

Foreword

In our Green Paper on Improving Government Performance we said:

"The transition to democracy fostered hope for a society where all citizens would have the opportunity to realise their full intellectual, physical, social and spiritual potential. This vision was captured in the Constitution, which spells out each citizen's entitlement to adequate housing, basic education, health care, food and water and social security. Although the rights are to be realised progressively over time within the available resources, the gap between vision and reality remains large. … to improve service delivery standards …we must do more with less. The focus has to be on value for money. Wasteful and unproductive expenditure and corruption cannot be afforded…. This part of the process is about improving our efficiency, it is about reducing the unit cost of the service we provide. Ensuring that the outputs deliver the outcomes that have been politically chosen, is a measure on whether government is being effective. Genuine change based on critical self-reflection is required. That means changes in how we behave, not just superficial adjustments to existing processes, systems and formats."

If we are to improve our performance we have to reflect on what we are doing, what we are achieving against what we set out to achieve, and why unexpected results are occurring. We cannot advance without making mistakes on the way, but we must evaluate and learn from our successes and our mistakes. Without this we cannot improve.
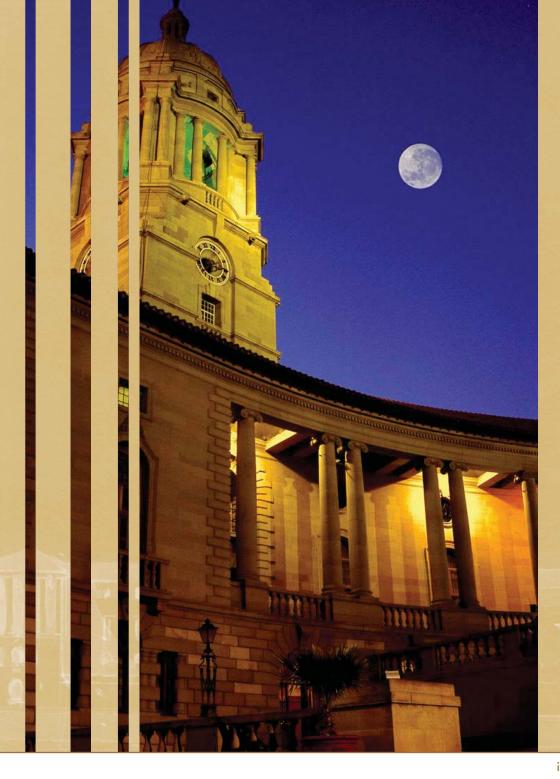
The Policy Framework for the Government-Wide Monitoring and Evaluation System (GWMES) which was approved by Cabinet in 2005 describes three "data terrains" which underpin the monitoring and evaluation system, namely, programme performance information; social, economic and demographic statistics; and evaluation. While the Presidency is the custodian of the GWMES as a whole, National Treasury has published the Framework for Programme Performance Information and Statistics South Africa has published the South African Statistics Quality Framework to provide policy frameworks for the first two terrains. This National Evaluation Policy Framework completes the set of policies which make up the GWMES.

We have put in place plans for our priority outcomes, and we are in the process of monitoring the implementation of them. However, monitoring is necessary but not sufficient - it only asks whether we are doing what we planned to do. In order to assess whether or not our plans are resulting in their intended impacts, and the reasons for this, we need to carry out evaluations. Evaluations involve deep analysis of issues such as causality, relevance, effectiveness, efficiency, value for money and sustainability. We must then use the results of these evaluations to inform improvements to our plans.

This Policy Framework provides the next essential part of the jigsaw, setting out the basis for government-wide evaluation, focusing on our priority areas. It should contribute to the establishment of a culture of continuous improvement in service delivery.

I would like to thank all the officials in national and provincial departments who contributed to the development of this policy framework. I would especially like to thank the Departments of Social Development and Basic Education and the Public Service Commission who allowed their evaluation specialists to be part of the core team which developed this document.

Collins Chabane
Minister of Performance Monitoring, Evaluation and Administration
November 2011.

Policy Summary

The National Evaluation Policy Framework (NEPF) is the last of the three policy elements introduced in the Policy Framework for the Government-Wide Monitoring and Evaluation System, which was approved by Cabinet in 2005. The other two elements are programme performance information and quality of statistical data.

This Policy Framework provides the basis for a minimum system of evaluation across government. Its main purpose is to promote quality evaluations which can be used for learning to improve the effectiveness and impact of government, by reflecting on what is working and what is not working and revising interventions accordingly. It seeks to ensure that credible and objective evidence from evaluation is used in planning, budgeting, organisational improvement, policy review, as well as on-going programme and project management, to improve performance. It provides a common language for evaluation in the public service.

This framework defines evaluation as:

The systematic collection and objective analysis of evidence on public policies, programmes, projects, functions and organisations to assess issues such as relevance, performance (effectiveness and efficiency), value for money, impact and sustainability and recommend ways forward.

Six specific types of evaluation are defined: Diagnosis, Design Evaluation, Implementation Evaluation, Impact Evaluation, Economic Evaluation and Evaluation Synthesis. These evaluations can occur at different stages – prior to an intervention, during implementation, and after implementation.

The seven key elements of the framework are:

1. Large or strategic programmes, or those of significant public interest or of concern must be evaluated at least every 5 years. The focus will be on government's priority areas, which are currently the 12 outcomes, including the 5 key areas of health, crime, jobs, rural development and education.
2. Rolling three year and annual national and provincial evaluation plans must be developed and approved by Cabinet and Provincial Executive Councils. These will be developed by DPME and the Offices of the Premier. These plans will identify the minimum evaluations to be carried out – departments will be free to carry out additional evaluations.
3. The results of all evaluations in the evaluation plan must be in the public domain, on departmental and DPME websites (excluding classified information).
4. Improvement plans to address the recommendations from the evaluations must be produced by departments and their implementation must then be monitored.
5. Departments will be responsible for carrying out evaluations. DPME and (in time) Offices of the Premier will provide technical support and quality control for evaluations in the national and provincial evaluation plans.
6. Appropriate training courses will be provided by PALAMA, universities and the private sector to build evaluation capacity in the country.
7. DPME will produce a series of guidelines and practice notes on the detailed implementation of the policy framework, to elaborate various aspects of the system, and to set quality standards for evaluations.

Contents

List of acronyms

DPME   Department of Performance Monitoring and Evaluation

DPSA   Department of Public Service and Administration

ECD   Early Childhood Development

EU   European Union

GWMES   Government-wide Monitoring and Evaluation System

M&E   Monitoring and evaluation

MFMA   Municipal Finance Management Act

MPAT   Management Performance Assessment Tool

NEPF   National Evaluation Policy Framework

PSC   Public Service Commission

PETS   Public expenditure tracking system

PFMA   Public Finance Management Act

PMDS   Performance Management and Development System

RCT   Randomised control trial

SAMEA   South African Monitoring and Evaluation Association

SASQAF   South African Statistics Agency Quality Assurance Framework

TORs   Terms of reference

UN   United Nations

A detailed definition of key terms is provided in Annexure 1.

Executive summary

Part A Introduction

1   Background

This Policy Framework seeks to address the use of evaluation to promote improved impact of government programmes, and at the same time increase transparency and accountability. While some departments are undertaking evaluations, there is no standardised approach, nor a systematic approach to ensuring that all major and strategic programmes are evaluated periodically.

The Framework aims to foreground the importance of evaluation in policy-making and management, and link evaluation to planning and budgeting processes. It aims to improve the quality of evaluations undertaken and ensure that evaluation findings are utilised to improve performance. The document's main target audience is political principals, managers and staff in government.

The focus is on evaluation of policies, plans, programmes[1] and projects, but not of organisations or individuals. The Framework recognises that application across government will be progressive, and that considerable capacity will need to be built for evaluations to be undertaken.

This document is the result of extensive international research on government evaluation systems. Donor-funded study tours were undertaken to Canada, U.K., Colombia, Mexico, U.S.A., Indonesia, Malaysia, Singapore and Australia. Information was also collected on government evaluation frameworks in Brazil, India and Chile.

The research, study tours and drafting of this Framework was carried out by a joint team of officials from DPME, the Department of Basic Education, the Department

[1]   Note that in this document the term "programmes" refer to actual policy/implementation programmes (like EPWP, maternal health programme), and not budget programmes (these may coincide, but they may also not).

of Social Development, the Public Service Commission and representatives from Offices of the Premier. National Treasury also helped to facilitate and participated in some of the study tours. Drafts of the Framework were circulated to national departments and provincial governments, workshops were held on the drafts, and this final draft incorporates the comments which were received.

2   Why evaluate

Evaluation can be undertaken for four primary purposes:

*   Improving performance (evaluation for learning);
*   Evaluation for improving accountability;
*   Evaluation for generating knowledge (for research) about what works and what does not;
*   Improving decision-making.

3   Approach to evaluation

Evaluation is defined as:

The systematic collection and objective analysis of evidence on public policies, programmes, projects, functions and organizations to assess issues such as relevance, performance (effectiveness and efficiency), value for money, impact and sustainability, and to recommend ways forward.

Evaluation asks questions against a pre-existing plan or strategic intent. It seeks to determine whether plans are achieving their intended impacts, and to assess the causal links between activities carried out under the plans and observed impacts. However, if plans are not clear, then it is difficult to evaluate. A challenge in South Africa is that plans are of variable quality and sometimes do not clearly identify the desired results and impacts and how these results will be measured, to enable the plans to be evaluated. This Policy Framework therefore also includes a brief section on key principles of planning which should be followed to enable evaluation to take place effectively.

Part B Undertaking Evaluation

4   Uses and types of evaluation

Planning an evaluation involves consideration of the object of evaluation (what is to be evaluated); the primary intended user of the evaluation; the purpose of the evaluation; the evaluation approach and methodology including the type of questions being asked; leading to identification of the type of evaluation needed. Six main types are identified – diagnostic evaluation, design evaluation, implementation evaluation, economic evaluation, impact evaluation, and evaluation synthesis. The priority for evaluations will be on large, strategic, or innovative interventions, those of significant public interest, or if decisions have to be made about continuation.

5   Assuring credible and quality evaluations

For evaluations to be credible and useful they must be relevant and timely for decisions, unbiased and inclusive and able to pass the tests of research validation. There are tensions between the degree of ownership (highest if the evaluation is conducted internally) and the degree of independence and external credibility (highest if external to the organisation, and external to government). A good model is where evaluations are conducted jointly, where an external evaluator works with an internal team.

6   The process of evaluation

This section covers the different stages of evaluation:

- Pre-design and design, including preparation, developing terms of reference, selecting service providers and issues of data quality;
- Implementation – with an inception phase, advisory/steering group, and ongoing management and support.

Peer review and validation should be used to strengthen credibility. Management must produce an improvement plan based on the recommendations of the evaluation, which must be communicated to different audiences.

Part C How do we make this happen

7   Institutionalising evaluation in Government

Departments have the responsibility to incorporate evaluation into their management functions as a way to continuously improve their performance. They need to:
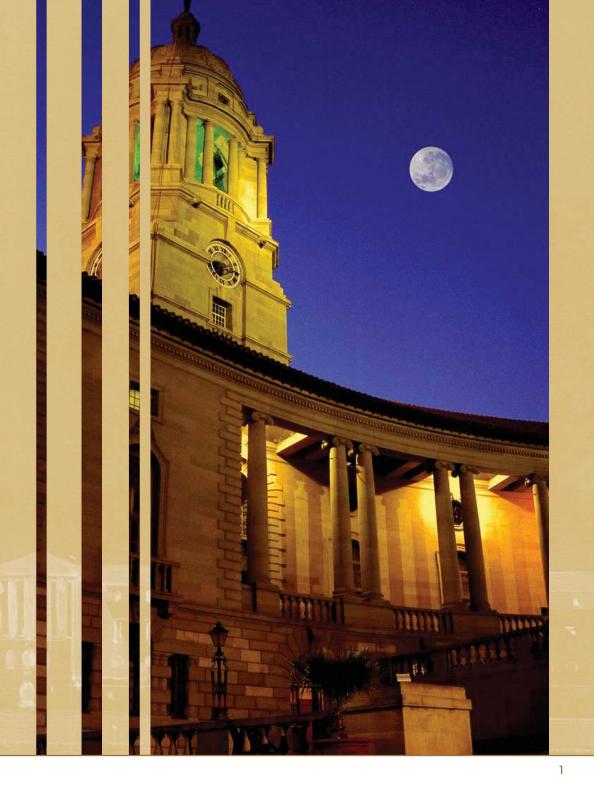
- Ensure there is an evaluation budget in all programmes and a rolling plan over 3 years for which evaluations will be undertaken;
- Ensure there are specific people within the organisation entrusted with the evaluation role, and with the required skills. This could be a M&E Unit, a research unit, a policy unit, or the section responsible for planning;
- Ensure that the results of evaluations are used to inform planning and budget decisions, as well as general decision-making processes. Thus the results of evaluations must be discussed in management forums and used to guide decision-making.

Rolling three year and annual evaluation plans will be produced nationally and provincially, and in national departments. A set of roles and responsibilities are identified, with DPME as the custodian of the system.

One of the ways to assure quality, particularly when there is limited capacity, is to avoid reinventing tools. DPME will issue specific guidance notes and guidelines setting standards for evaluation to complement this Framework. Donor-funded evaluations will also be expected to follow the Policy Framework. There is a capacity challenge and in order to maximise capacity, sufficient technical capacity will be established in DPME and eventually Offices of the Premier to support departments on methodology and quality. A community of practice on evaluation will be developed using the South African Monitoring and Evaluation Association (SAMEA) and the DPME M&E Learning Network. International partnerships are also being built with similar countries (e.g. Mexico and Colombia), and international organisations which specialise in evaluation, including 3ie and the World Bank.

8   *Management and coordination of evaluation across government*

In order for this policy framework to be implemented it needs a strong champion (DPME) but also needs broad buy-in across government and to build on the scarce evaluation skills which exist in government. An Evaluation Technical Working Group has been established to support DPME in taking forward evaluation nationally. This includes the main departments with evaluation capacity, including sector departments, the PSC, as well as DPSA, National Treasury and the Auditor General. A timeline with a set of targets is set out from January 2012 to March 2015 including 10 evaluations in the national plan in 2012/13, 15 in 2013/14, and 20 in 2014/15.

Part A

Introduction

1 Background

1.1 Legal basis for the Policy Framework

The Constitution (section 195) mandates that in the principles of public administration:

- Efficient, economic and effective use of resources must be promoted;
- Public administration must be development-oriented;
- Public administration must be accountable;
- Transparency must be fostered by providing the public with timely, accessible and accurate information.

In addition, the Public Finance Management Act (PFMA, 1999) the Public Service Act (1994 as amended by Act 30 of 2007) and the Municipal Finance Management Act (MFMA) provide a legal basis for the efficient and effective management of public policies and programmes. These Acts also provide a legal basis for undertaking the different types of evaluation.

The Policy Framework for the Government-wide Monitoring and Evaluation System was approved by Cabinet in 2005 and provides the overall framework for M&E in South Africa[2]. The Policy Framework draws from three data terrains for M&E purposes, each of which is the subject of a dedicated policy describing what is required for them to be fully functional. National Treasury has issued a Framework for Programme Performance Information[3], and Statistics South Africa has issued the South African Statistics Quality Framework (SASQAF)[4]. This National Evaluation Policy Framework completes the picture.

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2   Presidency (2007): "Policy Framework for the Government-wide Monitoring and Evaluation System", Pretoria, The Presidency, Republic of South Africa.
3   Treasury (2007): "Framework for Managing Programme Performance Information", Pretoria, National Treasury.
4   StatsSA (2008): "South African Statistics Quality Assurance Framework", Pretoria, Statistics South Africa.

1.2 Purpose

The overall problem statement that this framework is trying to address is:

> Evaluation is applied sporadically in government and is not adequately informing planning, policy-making and budgeting, so we are missing the opportunity to improve the relevance, effectiveness, efficiency, impact and sustainability of government's interventions.

This Framework aims to:

- Foreground the importance of evaluation in policy-making and management;
- Promote, facilitate and institutionalise the use of evaluation in government;
- Strengthen linkages between evaluation, policy-making, planning and budgeting;
- Develop a common language and conceptual base for evaluation in government;
- Clarify the role of evaluations in relation to other performance management instruments;
- Frame the evaluation function in terms of its scope, institutionalization, standards, process requirements, skill requirements, governance, financing and oversight;
- Clarify distinctions in the roles and responsibilities of public institutions in relation to evaluation;
- Improve the quality of evaluations undertaken in public institutions;
- Increase the utilisation of evaluation findings to improve performance.

It provides for the following:

- A common understanding of evaluation;
- An institutional framework for evaluations;
- Mechanisms to promote the utilisation of evaluations.

The Policy Framework is targeted at:

- Political principals, managers and staff in government who should be placing the need to incorporate rigorous evaluations at the heart of their work;

- Evaluators such as academics and other service providers;
- Training institutions, which need to develop a wider cadre of potential evaluators with the required skills and competences.

The Framework is in three parts – A which sets the approach and context, B which describes the evaluation system itself, and C, which is how we make this system happen.

2 Why evaluate?

Evaluation of government interventions can be undertaken for a number of purposes. The four primary purposes of evaluation are:

- Improving performance (evaluation for learning): this aims to provide feedback to programme managers. Questions could be: was this the right intervention for the stated objective (relevance, fit for purpose), was it the right mix of inputs, outputs, was it the most efficient and effective way to achieve the objective?
- Evaluation for improving accountability: where is public spending going? Is this spending making a difference? Is it providing value for money?
- Evaluation for generating knowledge (for research): increasing knowledge about what works and what does not with regards to a public policy, or programme, which allows governments to build an evidence base for future policy development.
- Decision-making – policy-makers, planners and finance departments need to be able to judge the merit or worth of an intervention. Is the intervention (be it a policy, plan, programme, or project) successful - is it meeting its goals and objectives? Is it impacting on the lives of the intended beneficiaries? Is the intervention impacting differentially on different sectors of the population? Are there unintended consequences? Is it worth expanding it or closing it?

Some of the potential benefits which can be obtained from evaluations include:

- Learning and feedback into policy and implementation;
- Ensuring policy and management decisions are based on evidence;
- Better understanding of which programmes are cost-effective;
- Saving money;
- Improving understanding and so being better able to overcome institutional bottlenecks to improved impact (adapting policies and programmes).

Ultimately these should result in:
- Strengthening the culture of use of evidence to improve performance;
- Better policy and planning;
- Better resource allocation;
- Minimising negative unintended consequences of policy;
- The public being aware of what government does (public accountability).

Finally these should result in better service delivery and the achievement of government objectives. The value of evaluation is in it being used for improving performance or for informing planning and budgeting decisions[5].

3 Approach to evaluation

3.1 What do we mean by evaluation

Evaluation is a branch of applied research that attempts to identify cause-effect relationships within a specific context[6]. In this Policy Framework we define evaluation as: The systematic collection and objective analysis of evidence on public policies, programmes, projects, functions and organizations to assess issues such as relevance, performance (effectiveness and efficiency), value for money, impact and sustainability, and recommend ways forward.

It is differentiated from monitoring:
Monitoring involves the continuous collecting, analysing and reporting of data in a way that supports effective management. Monitoring aims to provide managers with regular

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5   The approach to evaluation focusing on use is called Utlization-Focused Evaluation (UFE).
6   PALAMA, Basic M&E Course Manual, p17

(and real-time) feedback on progress in implementation and results and early indicators of problems that need to be corrected. It usually reports on actual performance against what was planned or expected (adapted from the Policy Framework on GWMES).

In summary, monitoring asks whether the things we planned are being done right, while evaluation is asking are we doing the right things, are we effective, efficient and providing value for money, and how can we do it better. Evaluation has the element of judgement, and must be against objectives or criteria[7]. In order to be able to attribute the cause of the impact to the intervention, evaluations should ideally include a counterfactual (where the intervention did not happen).

While evaluation is often seen as only occurring at the end of an intervention, different forms of evaluation should be undertaken at different phases, from prior to an intervention (sometimes called ex-ante evaluation), during an intervention (e.g. to check whether the activities are leading to outputs, and outputs to outcomes), and after the intervention has been completed (ex-post evaluation). This is discussed further in section 4.

The Policy Framework for GWMES has the following seven guiding principles for monitoring and evaluation:

1   Evaluation should be development-oriented and should address key development priorities of government and of citizens.
2   Evaluation should be undertaken ethically and with integrity.
3   Evaluation should be utilisation-oriented.
4   Evaluation methods should be sound.
5   Evaluation should advance government's transparency and accountability.
6   Evaluation must be undertaken in a way which is inclusive and participatory.
7   Evaluation must promote learning.

3.2 How do we compare evaluation to related activities

There is no hard line between evaluation, monitoring, and performance auditing. Table 1 below suggests the core elements of each in terms of the activity involved, and the objective.

Table 1:   Spectrum of results-based management activities[8]

	Activity	Objective
Inspection/investigation	Detects wrong doing and verifies information	Control and compliance
Performance audit	Check the validity of performance information produced by departments	Accountability, control, compliance
Monitoring	On-going tracking of progress against plans and initiating corrective action	Management, accountability, corrective action
Evaluation	Systematic collection and objective analysis of evidence to assess issues such as relevance, performance (effectiveness and efficiency), value for money, impact and sustainability, and to recommend ways forward.	Learning, accountability, improving performance, inform policy, planning and budgeting
Research	Testing hypotheses/ propositions through observation of reality	Learning/knowledge creation only (no accountability focus), can inform policy

7   Rossi, P.H, Lipsey, M.W. & Freeman H.E. (2004): "Evaluation, A Systematic Approach", Seventh Edition. Thousand Oaks: Sage Publications.

8   Adapted from Ajam, T (2011): "Evaluation and Performance Auditing in South Africa; Convergence of reforms?", paper at the 4th International Conference on leadership, "Governance and Policy in the Public Sector", School for Public Management and Administration, University of Pretoria 17-18 February 2011, Pretoria

3.3 Links between evaluation and planning

As mentioned earlier, if plans do not clearly identify desired results or outcomes and impacts, how these will be achieved and how these will be measured, then it is more difficult to evaluate the plans.

A good quality plan should include a diagnostic analysis of the current situation and the forces at play, and which are likely to be the main strategic drivers of change. It should also explain the logic model or theory of change of the plan, in other words, the causal mechanisms between the activities, outputs, outcomes and impacts (see Figure 1 below). It should explain the underlying hypothesis that if we do what we suggest, we will achieve certain objectives and targets. It should also be explicit about the assumptions being made about the external environment.

One of the purposes of evaluation is to test this logic model by asking questions such as:
- Were the planned outcomes and impact achieved, and was this due to the intervention in question? (Changes in outcome and impact indicators may have been due to other factors)
- Why were the outcomes and impacts achieved, or not achieved?
- Were the activities and outputs in the plan appropriate?
- Did the causal mechanism in the logic model work? Did the assumptions in the logic model hold?

Plans should identify good quality measurable indicators which will be monitored during implementation. Again, failure to collect baseline information on these indicators and to monitor and record changes to the indicators during implementation makes evaluation difficult.

In order to be evaluated, all plans should meet the requirements described above, including the long-term national vision and development plan, five year national and provincial plans aligned to the electoral cycle, delivery agreements for outcomes, sectoral plans, and programme and project plans. If government's strategic priorities are to be achieved then these priorities should also be traceable across the levels of government, through the different plans. In other words, there should be a "line of sight" across the plans.

Figure 1: The results-based management pyramid (National Treasury 2007)

Part B

Undertaking Evaluation

4 Uses and types of evaluations

4.1 Introduction

This section covers the different issues to be considered in planning evaluations, and then describes a set of main types of evaluations. It also provides guidance as to when these evaluations should be conducted in the programme or policy cycle.

A number of factors need to be taken into account in considering evaluations, including:

- The object of evaluation – what is to be evaluated (4.2);
- The primary intended user of the evaluation (4.3);
- The purpose of the evaluation (4.4);
- The approach and methodology (4.5):
- The type of questions being asked (4.6);
- The type of evaluation needed (4.7);
- The priority interventions to focus on (4.8/9).

4.2 The unit of analysis or object of evaluation

The unit of analysis or objects of evaluation range from: policies; plans; programmes; projects; organisations or institutions; to individuals. However in this framework we focus on policies, plans, programmes and projects. Later versions of the framework may include organisational evaluation. Practice notes or guidelines will be issued as guidance for specific objects of evaluation, e.g. policy evaluations, or megaprojects.

4.3 Primary intended users

In utilization-focused evaluation, the focus is on the primary intended user, and working with them to learn and take forward the results of the evaluation[9]. In this framework the primary intended users will mostly be managers of departments, who need to understand the way their interventions are working in practice and the outcomes and impacts these are having and why.

4.4 Unpacking the purposes of evaluation

Table 2 below takes the purposes suggested in section 1 and gives some related sub-purposes. This helps to see where particular reasons for undertaking an evaluation fit in terms of the wider purpose.

Table 2: Some primary uses/purposes of evaluation studies[10]

Purposes	Examples of reasons or decisions for use
Improving policy	Identifying strengths and weaknesses. Improving theory of change and so impact. Quality enhancement. Improving cost-effectiveness. Adapting a model locally.
Improving programmes and projects	Assessing learning Improving theory of change and so impact. Identifying strengths and weaknesses. Quality enhancement. Improving cost-effectiveness. Managing more effectively Adapting a model locally.
Improving accountability	Assessing impact. Assessing compliance/audit. Improve transparency. Accountability
Generating knowledge	Generalisations about effectiveness. Extrapolating principles about what works. Building new theories and models. Informing policy.
Decision-making	Assessing impact. Cost-benefit decisions. Deciding a programme's future.

9   Michael Quinn Patton (1994): "Utiliiation-Focused Infomation and Training", Education Practice, Vol. 15, No. 3, 1994, pp. 311-319, JAI Press.

10   Adapted from Patton, 1997, in Barbie, E. & Mouton, J. (2007): "The Practice of Social Research", Oxford, Oxford University Press.

4.5 Approach and methodology

A range of methodologies may be appropriate, and the methodology must serve the purpose of the evaluation. A wide range of research techniques and data sources can be used, depending on the evaluation object and the evaluation questions at hand. However, evaluations must be systematic, structured and objective and must use defensible techniques for data collection and reliable data sources. They must also be available for use by policy-makers and not kept secret because the findings are uncomfortable. Details of specific approaches and methodologies will be covered in future practice notes.

4.6 Evaluative questions

Typical evaluative questions may range from:
- Do policies or programmes have clear objectives and theory of change? (later referred to as a design evaluation question);
- Are the steps involved in delivering a service efficient? (later referred to as an implementation evaluation question);
- How have beneficiaries' lives changed as a result of a programme or policy? (impact evaluation question);
- Is this programme providing value for money? (cost-effectiveness question)

Some key issues for evaluation are[11]:
a) Relevance - to what extent are the policy, programme or project's objectives pertinent in relation to the evolving needs and priorities of government?
b) Efficiency - how economically have the various resource inputs been converted into tangible goods and services (outputs) and results?
c) Effectiveness – to what extent have the outcomes been achieved and have the outputs of the policy, programme or project contributed to achieving its intended outcomes?
d) Utility - how do the results of the policy, programme, or project compare with the needs of the target population(s)?
e) Sustainability - to what extent can the positive changes be expected to last after the programme has been terminated?

4.7 The types/categories of evaluation we will promote across government

Different countries use different terms to describe evaluations. This includes the commonly used terms of formative and summative evaluations. Based on the different objects, purposes and questions, a set of standard types of evaluation is proposed below to be used across government in South Africa. This set of types of evaluation is based on the base model which links inputs to activities, outputs, outcomes and impacts, which is also used in the Framework for Managing Programme Performance Information, published by National Treasury (see Figure 2). This will help to develop a common language, and establish standard procedures. Table 3 summarises these types and their uses.

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11 EU (1997): "Evaluating EU Expenditure Programmes: A Guide", Brussels, European Union.
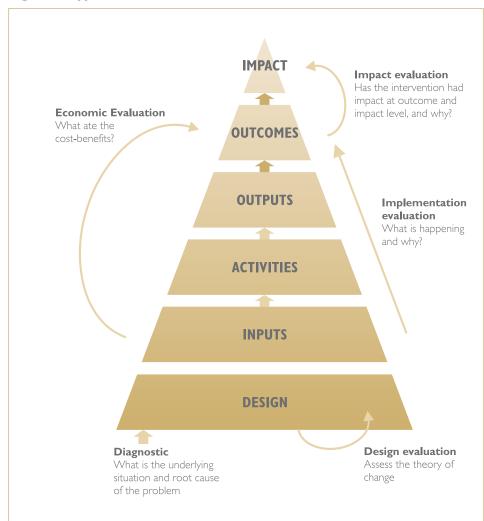
Figure 2: Types of evaluations

Impact evaluation
Has the intervention had impact at outcome and impact level, and why?

Economic Evaluation
What ate the cost-benefits?

Implementation evaluation
What is happening and why?

Diagnostic
What is the underlying situation and root cause of the problem

Design evaluation
Assess the theory of change

(Pyramid levels, top to bottom: IMPACT, OUTCOMES, OUTPUTS, ACTIVITIES, INPUTS, DESIGN)

Table 3: Summary of types of evaluation across government[12]

Type of evaluation	Covers	Timing
Diagnostic Evaluation	This is preparatory research (often called ex-ante evaluation) to ascertain the current situation prior to an intervention and to inform intervention design. It identifies what is already known about the issues at hand, the problems and opportunities to be addressed, causes and consequences, including those that the intervention is unlikely to deliver, and the likely effectiveness of different policy options. This enables the drawing up of the theory of change before the intervention is designed.	At key stages prior to design or planning
Design evaluation	Used to analyse the theory of change, inner logic and consistency of the programme, either before a programme starts, or during implementation to see whether the theory of change appears to be working. This is quick to do and uses only secondary information and should be used for all new programmes. It also assesses the quality of the indicators and the assumptions.	After an intervention has been designed, in first year, and possibly later
Implement-ation evaluation	Aims to evaluate whether an intervention's operational mechanisms support achievement of the objectives or not and understand why. Looks at activities, outputs, and outcomes, use of resources and the causal links. It builds on existing monitoring systems, and is applied during programme operation to improve the efficiency and efficacy of operational processes. It also assesses the quality of the indicators and assumptions. This can be rapid, primarily using secondary data, or in-depth with extensive field work.	Once or several times during the intervention
Impact evaluation	Seeks to measure changes in outcomes (and the well-being of the target population) that are attributable to a specific intervention. Its purpose is to inform high-level officials on the extent to which an intervention should be continued or not, and if there are any potential modifications needed. This kind of evaluation is implemented on a case-by-case basis.	Designed early on, baseline implemented early, impact checked at key stages e.g. 3/5 years

12   This draws from the Mexican experience, Castro el al (2009): "Mexico's M&E System: Scaling Up from the Sectoral to the National Level", ECD Working Paper Series, Independent Evaluation Group, Washington, World Bank.

Type of evaluation	Covers	Timing
Economic evaluation	Economic evaluation considers whether the costs of a policy or programme have been outweighed by the benefits. Types of economic evaluation include: • cost-effectiveness analysis, which values the costs of implementing and delivering the policy, and relates this amount to the total quantity of outcome generated, to produce a "cost per unit of outcome" estimate (e.g. cost per additional individual placed in employment); and • cost-benefit analysis (CBA), which goes further in placing a monetary value on the changes in outcomes as well (e.g. the value of placing an additional individual in employment).[13]	At any stage
Evaluation synthesis	Synthesising the results of a range of evaluations to generalise findings across government, e.g. a function such as supply chain management, a sector, or a cross-cutting issue such as capacity. DPME will undertake evaluation synthesis based on the evaluations in the national evaluation plan and do an annual report on evaluation.	After a number of evaluations are completed

4.8 Evaluations of new programmes

Evaluation can be applied to new programmes, as well as existing ones. In new ones the key components to be used first include diagnostic evaluations to understand the situation and develop a theory of change, and design evaluations to check the design and theory of change after the planning has taken place.

4.9 Evaluations of existing programmes

In principle all programmes and projects should be evaluated on a 5 year cycle. In practice due to limited capacity this should start with all large interventions and with a particular priority on the top 5 of the 12 outcomes (health, education, crime,

13   UK (2011): "Magenta Book", London, Treasury.

rural development, and employment). Factors to consider in prioritising evaluations include:

I.   Large (e.g. over R500 million) or covering a large proportion of the population, and have not had a major evaluation for 5 years. This figure can be reduced with time;

Other factors then to consider are:

II.   Of strategic importance, and for which it is important that they succeed. If these have not been evaluated for 3 years or more, an implementation evaluation should be undertaken;

III. Innovative, from which learnings are needed;

IV.   Of significant public interest – e.g. key front-line services;

V.   Any programme for which there are real concerns about its design should have a design evaluation conducted;

VI.   If decisions have to be made about continuation of the programme.

In the case of I or II, if no formal impact evaluation has been conducted, one should be planned. DPME will develop a rolling 3 year and annual evaluation plan which will include categories I-IV above. Departments are free to decide on additional evaluations, which may well include V and VI.

5   Assuring credible and quality evaluations

The results of evaluations must be used. Improving the likelihood of utilisation means the evaluations should be credible and conducted to appropriate quality standards. Use is improved by focusing on three features of an evaluation:[14]

I.   Evaluations are relevant and timely for decisions. Evaluation become salient by seeking answers to questions of importance in programmes and policies in

14   This listing is adapted from: David and Lucile Packard Foundation. (2010). Linking Knowledge with Action. Retrieved November 5, 2010, from http://www.packard.org/assets/files/conservation%20and%20science/Linking-Knowledge-with-Action.pdf; and Lee, K., & Rowe, A. (in preparation). Linking Knowledge with Action: an approach to philanthropic funding of science for conservation

time for decision processes.

2. Evaluations are legitimate by being unbiased and inclusive. Strengthening legitimacy can be attained through the involvement of the stakeholders who should use the evaluation results. Using peer review and synthesis of existing knowledge can help to assure users of evaluation that the analysis in unbiased.

3. Evaluations are credible when they pass the tests of research validation appropriate to the situation. There are varying degrees of validation that can be conducted on an evaluation. To a large extent the tests conducted depend on the questions and the required timelines for answers. In some instances e.g. design evaluation, interviews alone are sufficient. For impact evaluation a range of statistical validation approaches may be required.

The African Evaluation Guideline further elaborates on these features and others for quality evaluation.[15] In interacting with these features decisions need to be taken on the relationship of the evaluator to the programme or policy. There are tensions between the degree of ownership (highest if conducted internally) and the degree of independence and external credibility (highest if external to the organisation, and external to government). This leads to different options in commissioning evaluations:

• Internal can mean the programme staff, or the organisation involved;
• External can mean external to programme, external to the organisation, or non-government; and
• Joint can mean that evaluators are external to the organisation, but regularly interact in the evaluation of the programme, potentially from design through to impact.

These terms can also refer to the initiators of evaluation – who requests the evaluation in question (programme staff, the organisation itself, or an external body such as the PSC) - as well as who actually undertakes the evaluation. We will use external to mean outside the organisation in question.

15   http://www.afrea.org/content/index.cfm?navID=5&itemID=204

Table 4 shows the different possibilities of internal or external initiation and undertaking of evaluations. In most cases the evaluations should be internally initiated, or as a partnership with an external body such as DPME. In this way ownership of the evaluation is retained and there is most likelihood of a successful evaluation and one that is followed-up.

There is also another possibility where an evaluation is initiated externally to the department and undertaken by staff of the evaluating body, e.g. PSC or DPME. There can also be a hybrid where part of the evaluation is conducted externally.

Table 4:   Internal or external initiation and conducting of evaluation

Undertaken by who	Initiated by who	
	Internally initiated	**Externally initiated**
Undertaken internally to the institution of study	Undertaken within the institution either by staff of the programme in question, or other relatively independent staff for timely feedback or learning	Evaluation initiated by external body e.g. Presidency, and institution asked to do internal evaluation to improve performance
Undertaken externally	External service provider or government institution to ensure credibility e.g. impact or implementation evaluation of programme	Evaluation initiated by external body e.g. Presidency or PSC, and commissioned to external service provider or government institution
Undertaken jointly	Undertaken within the institution, but facilitated by external expertise. This is to improve participation in the evaluation, while drawing upon important expertise that may be unavailable within the institution to increase the credibility of the evaluation. This option can be expensive.	Evaluation initiated by external body e.g. Presidency, PSC, or outcomes forum interested in ensuring coherence in evaluation of a new or complicated programme.

6   The process of evaluation

This section provides an overview of the different stages of the evaluation process. Note that the process of evaluation is as important as the product, as the process can ensure that the primary intended users understand the findings and are committed to implement them. Indeed, if the process is inclusive, the intended users may well have implemented some of the findings before the evaluation is complete.

6.1 Pre-design and design

A necessary, although not sufficient, condition for a quality evaluation is a systematic process that ensures that the evaluation is properly understood by the evaluation client, evaluator and the evaluation object (e.g. a programme), that it is properly focused, appropriately designed and undertaken, and will deliver credible, reliable, valid information in a way which promotes learning.

Preparation

Preparation for any evaluation requires investment in time and thought. The organisation needs to decide precisely why and when to conduct an evaluation. This needs to begin early in the programming cycle, especially for new programmes. In many cases a literature review or research synthesis exercise should be undertaken to identify what research exists and to define the key questions to address.

The evaluation head must determine and clarify the object of the evaluation, draft the terms of reference and decide whether to undertake the evaluation internally or externally. They will need to go through an appropriate process to select an evaluation team and team leader. In addition, more often than not evaluation of results requires the involvement of other partners or stakeholders beyond the line function that manages the programme. It is therefore advisable that key partners are involved in each step of the evaluation process.

Developing Terms of Reference

At a minimum, it is expected that terms of reference for all evaluations will contain the objectives, scope, products/deliverables, methodology or evaluation approach, evaluation team and implementation arrangements. The terms of reference should retain enough flexibility for the evaluation team to determine the best approach to collecting and analysing data. Since the terms of reference involves strategic choices about what to focus on, they should be reviewed by key stakeholders, including the Evaluation Unit in DPME. A set of standard terms of reference will be developed by DPME to provide guidance.

Selecting service providers

The regulations and policies governing supply chain management practices in a particular department should be applied. For evaluation, where quality of methodology and research competence is critical, it is important that the selection and choice of the appropriate service provider is not determined only by price but that technical competence is predominant. DPME will establish a national panel of approved evaluators, and service providers can be selected either from this list, or from the department's own supplier panel (which may have more content-related experts).

Data quality and availability

Shortcomings of the data directly influence the analyst's ability to reflect the real world which the data are meant to describe. The analyst cannot take the data at face value. When examining data quality, whether primary or secondary sources, the evaluator needs to look at what (if any) appropriate data are available and how useful the data actually are for analysis. There is no point in looking at something for which no data exists. To judge the quality of data, Statistics South Africa s SASQAF standards should be used (relevance, accuracy, timeliness, accessibility, interpretability, coherence, methodological soundness and integrity).

6.2 Implementation

Inception phase
There should be an inception phase during which the evaluators decide on the evaluation object and theory of change, scope, questions, methodology, process, reports, cost and payments. An inception document must be approved by the project head and steering group.

Advisory/steering group
For major evaluations there must be an advisory or steering group. An advisory group provides technical support, advice and expertise while a steering group manages the evaluation process. It should be chaired by the person responsible for the evaluation team in the commissioning institution and include the evaluation team leader as well as other relevant stakeholders that could be affected by the evaluation results/findings, e.g. other government departments, civil society organisations, donors, as well as international organisations or agencies like the UN if valuable. If academics form part of the steering group they can play a peer review role.

Management and support
There should be regular technical meetings between the evaluation team and the evaluation steering committee or organisational team so that challenges can be addressed. This includes regular briefings of senior managers or political principals so they are kept fully abreast, involved and supportive of what is emerging.

6.3 Peer review and validation process

A peer review process should be established for external (and some internal) evaluations to ensure they are credible. This could include peer departments, as well as a panel of evaluators, and should look at the process as well as the product, and how far the conditions for utilization have been established. It is recommended that two appropriately qualified people should be critical reviewers of each evaluation,

which should be budgeted for as part of the evaluation budget. They should give feedback in a session with the department.

It is also valuable to undertake a validation process where the findings of the draft report are presented to a workshop of stakeholders.

6.4 Recommendations and management response

During the formulation of recommendations the following steps are needed:
1. Evaluators draw up recommendations with the users, but having the right to indicate findings and recommendations that the users do not agree with;
2. Users analyse the findings and recommendations of an evaluation report;
3. Management responds to the findings and recommendations of an evaluation report, and write a management response, either accepting the results or indicating where they disagree, with reasons.

6.5 Communicating results

Since the evaluation will have different messages for various stakeholders and audiences, it is imperative that these messages are drawn out potentially in a range of documents for different audiences – political (short and to the point), different technical audiences, beneficiaries etc. The messages for political principals and the executives should be very concise and highlight key evaluation questions, findings and recommendations.

Some specific things to be done:
• The 1/3/25 rule applies - a one page policy summary of key policy messages should be produced, a 3 page executive summary, and a 25 summary report from what might be a very long evaluation report. It is likely that only the 1/3/25 reports will be read;
• Develop a strategy for the dissemination of the evaluation report, including

publishing evaluation reports on relevant websites, developing communication materials on the evaluation, sharing findings with key stakeholders as well as the media;

- The department must ensure that the full evaluation reports are posted on their websites as well as the management response;
- A copy of the evaluation and the management response must be submitted to DPME for lodging on DPME's website;
- Copies should be sent to partners in the evaluation in question.

Note that a proportion of the evaluation budget should be retained for communication.
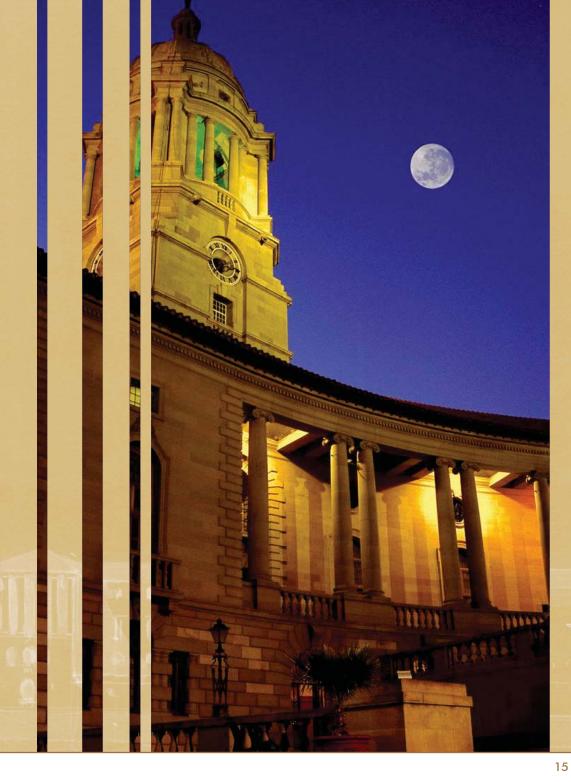
6.6 Follow-up

Evaluations are a positive tool for the improvement of institutional performance, policies, programmes and projects. Following up on evaluation findings and recommendations is therefore a crucial stage in the evaluation process, and the whole focus of the evaluation process must be on promoting utilization.

Following the production of the report and the management response, the leadership of the department must:

1. Prepare an improvement plan in response to the evaluation following a standard format. This improvement plan must be lodged with Offices of the Premier if provincial in nature, and DPME if national.
2. Undertake the necessary actions (such as changes in institutional work processes, policy or programme review, amendments to implementation strategies, changes to internal budget allocations) to improve the functioning of an institution or the delivery of a programme or project.
3. Monitor implementation of the improvement plan and report to DPME/Offices of the Premier on a 3 monthly basis on progress on implementing the plan.
4. DPME will report to Cabinet and Offices of the Premier to EXCO on the

progress with evaluations in the national/provincial plan, including of follow-up.
5. National/Provincial Treasury will utilise the findings and recommendations of the evaluation report as a source of evidence to support the budget process.
6. Departments should use the findings of the evaluations in subsequent planning and budgeting processes.

Part C

How do we make this happen?

7 Institutionalising evaluation in government

7.1 Evaluation plan

Rolling three year and annual national evaluation plans will be developed by DPME and approved by Cabinet starting with 2012/13, including large, strategic and innovative programmes and policies suggested by departments (see 4.9 for priority categories of interventions). By 2013/14, Offices of the Premier should draw up similar evaluation plans in provinces, as should national departments. Departments can choose to do additional evaluations.

7.2 Roles and responsibilities

Departments have the responsibility to incorporate evaluation into their management functions as a way to continuously improve their performance. They need to:

- Ensure there is an evaluation budget in all implementation programmes (see 8.4) and a plan over 3 years identifying which evaluations will be undertaken, and the form of evaluation;
- Ensure there are specific people within the organisation entrusted with the evaluation role, and with the required skills.
- Ensure that the results of evaluations are used to inform planning and budget decisions, as well as general decision-making processes. Thus the results of evaluations must be discussed in management forums and used to guide decision-making.

In terms of specialist functions in supporting the evaluation system key players include DPME, Treasury, DPSA, PALAMA, and the Auditor General.

DPME is the custodian of the government-wide monitoring and evaluation function in government, and has established an Outcomes Evaluation and Research Unit to focus on evaluation. This role includes:

- Leadership and promotion of evaluation in government, including development of policy, vision and championing the discipline;
- Standard setting, with the development and publication of suitable standards and guidelines;
- Pooling of knowledge emerging from evaluations and publishing evaluations;
- Quality assurance of evaluation processes and products;
- Co-funding some evaluations in the National Evaluation Plan;
- Capacity building and technical assistance, ensuring suitable courses are established and providing technical assistance to departments;
- Monitoring of progress against the National Evaluation Plan;
- Evaluating the evaluation process itself to ensure it is adding value and that the benefits outweigh the costs;
- Reporting to Cabinet on progress with evaluation.

Offices of the Premier will eventually play a similar role at provincial level, accessing support from DPME as needed.

National Treasury has to ensure value for money when it allocates budgets. To this end it needs to see that:

- Plans and budgets are informed by evidence, including from evaluations;
- Cost-effectiveness and cost-benefit analyses are undertaken and that interventions are providing value for money.

Provincial Treasuries should play a similar role at provincial level.

DPSA has to see that the results of evaluations that raise questions around the performance or structure of the public service are addressed.

PSC has a specific independent role in the evaluation process, reporting directly to Parliament, but is also a source of expertise in helping to build the quality of evaluation and improving the performance of government.

The Auditor-General is also an independent body, but is an important player in its role of performance audit, which assists with assuring the reliability of data.

DCOG is responsible for M&E of local government.

PALAMA is responsible for developing M&E capacity-building programmes across government.

Universities are also an important actor in that they provide the skills development to support this framework. This should not only be specialised M&E courses, but also courses in public administration, development studies etc. They and other research service providers will also supply many of the evaluators, particularly where sophisticated research methodologies are needed, e.g. for impact evaluations, and undertake research which is closely allied to evaluation, and can help to inform research processes.

The South African M&E Association (SAMEA) is the national association of people and organisations involved in M&E. They need to support the development of systems and capacities, and are an important forum for learning and information sharing.

7.3 Planning and budgeting for evaluation

Evaluations will not be realised unless they are budgeted for. Evaluation costs are typically 0.1%-5% of an intervention's budget, depending on size (large programmes need proportionally less). This needs to be factored into annual budgets and the MTEF. This is particularly important where large budgets are needed, e.g. for impact evaluations. The cost of an evaluation will depend on its complexity. Frequent small evaluations which provide feedback immediately into implementation may be more useful than large ones, particularly for complex interventions where the future is unclear.

7.4 Standardised systems

One of the ways to ensure quality, particularly when there is limited capacity, is to avoid reinventing tools. DPME will issue specific guidance notes and standard setting guidelines for evaluation to complement this Framework. These will include such elements as:
- Standardised terms of reference for different types of evaluation;
- Standard contract formats for evaluation by external service providers;
- Models for programme design (logic models) which facilitate evaluation;
- Formats for programme rules of operation to provide some standardisation of how programmes operate;
- Standardisation of evaluation processes to improve quality, such as use of inception reports and evaluation report guidelines;
- Guidelines for improvement plans;
- A national panel of evaluators, possibly with standardised fee rates;
- Warehousing of data generated during evaluations.

7.5 Donor-funded evaluations

Donors have funded many evaluations. However there is a potential for parallel systems which puts major strains on government capacity. This Evaluation Framework should also be used by donors.

7.6 Optimising limited capacity

There is limited evaluation capacity in government and externally. In order to address this:
- Sufficient technical capacity will be established in DPME and eventually the Offices of the Premier to support departments on methodology and quality;
- Evaluations can be outsourced to external evaluations using an accredited panel;

- Short courses are needed from PALAMA, universities, and private consultants. Proactive work will be undertaken to ensure courses address the type of skills needed to address this framework. In addition funds are being sourced to assist with capacity development, in particular to build a cadre of experienced black evaluators, as universities often depend on a limited range of experienced and older white researchers;
- A community of practice on evaluation will be developed using SAMEA and an M&E Learning Network;
- International partnerships are being built with similar countries (e.g. Mexico and Colombia), and international organisations, e.g. 3ie and World Bank.

8 Management and coordination of evaluation across government

8.1 Evaluation Technical Working Group

In order for this Policy Framework to be implemented it needs a champion (DPME) but also needs broad buy-in across government. An Evaluation Technical Working Group has been established to support DPME in taking forward evaluation nationally. This includes the main departments with evaluation capacity, plus the PSC, DPSA, National Treasury and the Auditor General.

This group of experienced evaluation professionals will meet on a regular basis to discuss issues such as the national evaluation plan, policy documents, technical guidelines and capacity building.

8.2 Implementation of the Policy Framework

This Policy Framework requires a major up scaling of the use of evaluations, which will have to be addressed in phases. The envisaged timeframes are shown in Table 5. Initially the Framework is obligatory only for the evaluations in the Evaluation

Plan to be approved by Cabinet. Departments may retain their existing evaluation frameworks, but should review them in light of the approach in this Policy Framework.

Table 5: Three year timeline for evaluation policy, systems and implementation

	Policy and systems	Implementation
2011/ 2012	- Evaluation Policy Framework adopted by Cabinet 3 year and annual evaluation plan developed - Practice notes developed on key elements including TORs, contracting, and the different evaluation types - Evaluation unit created in DPME - PALAMA courses designed to support this approach to evaluation - Schedule of competencies for evaluators developed - Panel of evaluators created in DPME - Support agreed with international partners - Minimum standards agreed by Cabinet for programme and project plans	4 evaluations commissioned which test out these systems - Audit completed of all evaluations in the public sector from 2006 - All evaluations hosted on DPME website - Evaluation Technical Working Group starts operation - Dissemination process for this Policy Framework - Capacity development process for evaluation designed
2012/ 2013	- Systems revised based on experience - System of standards for evaluators developed - Discussions with universities to take on this approach to evaluation	10 evaluations undertaken or started using standard procedures, of which at least 2 are impact evaluations - At least 60% of recommendations from evaluations implemented - Training of at least 200 people using PALAMA materials - University M&E courses adapted

	Policy and systems	Implementation
2013/ 2014	• Systems revised based on experience	• 15 evaluations undertaken or started using standard procedures, of which at least 4 are impact evaluations • At least 70% of recommendations from evaluations implemented • Training of at least 500 people using PALAMA materials
2014/ 2015	• Systems revised based on experience	• 20 evaluations undertaken or started using standard procedures, of which at least 5 are impact evaluations • At least 75% of recommendations implemented • Training of at least 500 people using PALAMA materials • All university public administration courses use adapted materials • Other university courses use adapted materials (e.g. development studies) • Evaluation of the impact of evaluations carried out to date.

8.3 Quality assurance

DPME will have the responsibility for ensuring that the evaluation system operates with sufficient quality. In order to fulfil this role, DPME will:

•   Be involved in evaluations in the National Evaluation Plan, e.g. reviewing TORs, reviewing the methodology in proposals, being part of steering groups, reviewing evaluation documents, ensuring that key systems are in place like steering groups

•   Develop a national panel of evaluators:

•   Ensure a set of competences and standards for evaluators are developed and applied;

•   Provide guidance through standardised procedures and practice notes;

•   Undertake meta-evaluation of evaluations.

8.4 Monitoring of evaluations

DPME will monitor progress with evaluations and will ensure that evaluations are carried out to measure the impact of evaluation itself. It will report on the findings to Cabinet.

Annexures

Annexure 1: Glossary

Cost-benefit-analysis	An analytical procedure for determining the economic efficiency of a programme, expressed as a relationship between costs and outputs, usually measured in monetary terms.
Counterfactual	All else being equal, what would have happened if an intervention did not exist or if some other policy initiative was implemented.
Ex-ante / prospective evaluation	Ex-ante evaluation is a process that supports the preparation of proposals for interventions. Its purpose is to gather information and carry out analyses that help to define objectives, to ensure that these objectives can be met, that the instruments used are cost-effective and that reliable later evaluation will be possible.
Ex-post (or post-hoc/retrospective evaluation)	Assessing/evaluating quality after a programme or institution has been in operation in order to establish strengths and weaknesses.
Formative evaluation	Evaluation activities undertaken to assist learning and provide information that will guide programme improvement, especially in terms of how, why, and under what conditions a policy will work or has worked.
Meta-analysis	Determining the overall balance of evidence from different sources and studies (usually expressed in non-quantitative, narrative form) (see statistical meta-analysis).
Multi-criteria analysis[16]	Multi-criteria analysis allows us to formulate judgements on the basis of multiple criteria, which may not have a common scaling and which may differ in relative importance.
Programme theory (usually linked to the theory of change below)	The set of assumptions about the manner in which programme relates to the social benefits it is expected to produce and the strategy and tactics the programme has adopted to achieve its objectives.
Public Expenditure Tracking Surveys (PETS)	Assesses whether resources reached the intended beneficiaries and whether they result in better services. It can be combined with a quality service delivery survey.

Quasi-experiments	An impact evaluation design in which intervention and comparison groups are formed by a procedure other than random assignments.
Research synthesis	A way of establishing what is already known about a policy initiative, especially its achieved impact and its implementation challenges in other policy environments.
Statistical meta-analysis	The aggregation and generation of cumulative statistical estimates of impact from combining the results of different comparable studies.
Summative evaluation	Evaluation activities undertaken to render a summary judgement on the impact of the programme's performance, e.g. specific goals and objectives were met.
Theory of change	A tool that describes a process of planned change, from the assumptions that guide its design, the planned outputs and outcomes to the long-term impacts it seeks to achieve.

16 EU guideline (1997) already cited earlier

Notes

Department of Performance Monitoring and Evaluation

Private Bag X944
Pretoria
0001
South Africa

Tel: +27 12 308 1900
Fax: +27 12 300 5707

www.thepresidency-dpme.gov.za

THE PRESIDENCY
REPUBLIC OF SOUTH AFRICA

DEPARTMENT: PERFORMANCE MONITORING AND EVALUATION