Evidence management for an effective and efficient

Socio-economic Impact Assessment System

(SEIAS)

An organizational guide on using evidence when implementing SEIAS

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About this Guide

Public policy making in South Africa has a complex history and, since 1994, became the key focus for whole of Government's work. Departing from decades of policies that were formulated on the basis of segregation and exclusion, policy making demonstrated many challenges in entrenching progressive public policy to positively influence the lives of all citizens. Much progress has been made, yet challenges in policy implementation remain a major stumbling block in achieving developmental objectives and overcoming the triple challenges of poverty, inequality and unemployment. The use of timely, relevant and quality evidence is at the heart of public policy making. This guide is a supplement to the National Policy Development Framework of 2020 by the South African Presidency[1], as it focusses on mainstreaming evidence-use in public policy development.

Since 2007, the Presidency took on the role of championing Evidence Based Policy Making (EBPM) via the initiation of the Program to Support Pro-poor Policy Development (PSPPD). Over the years, many public officials at all levels were orientated, trained and equipped with the concept and practice of EBPM, thereby developing some level of public sector capacity in using evidence for policy and decision making. In more recent years, with the understanding that policies and decisions are not 'based' on evidence alone, the adoption of "Evidence Informed Decision Making" became more relevant in practice. The introduction of the Socio-Economic Impact Assessment System (SEIAS), which replaces the Regulatory Impact Assessment, has effectively institutionalized evidence-use beyond single projects, trainings or events. It provides a sound methodology for public officials to systematically use evidence to design, review and implement policies, legislation and regulations for better outcomes and impact.

With an increasing number of public officials and departments seeking to manage and use evidence in undertaking a SEIAS, the need for a systematic approach to using evidence when implementing the SEIAS is also growing. The approach recommended in this guide was initially piloted during the housing to human settlements White Paper policy development process in 2019, when Government and academia were supported in using a credible, transparent and organized evidence base. The content of the guide was then further developed and applied to other high-level policy areas. The substantive content was integrated to meet the needs of officials from other sectors, which led to this guide as a resource for any department undertaking a SEIAS. It is not meant to be prescriptive, but rather considered a navigation tool to use evidence across the public sector.

The guide is divided into two parts:

Part I	Provides the concept and purpose of SEIAS in a summarized way and identifies what evidence capacities are needed. A brief introduction is given to four building blocks in meeting SEIAS evidence needs as well as long-term organizational (departmental) capacity.
Part II	This is the "How-to" part of the guide, outlining a three-stage approach in an ex-ante or forward-thinking model. The contextual analysis and pre-SEIAS stage are preparatory before the actual undertaking of SEIAS I & II, as guided by the SEIAS team.

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[1] The National Policy Development Framework 2020 was adopted by Cabinet on 2 December 2020 and launched on 9 March 2021. https://www.gov.za/sites/default/files/gcis_document/202101/national-policy-development-framework-2020.pdf

PART I – UNDERSTANDING SEIAS EVIDENCE NEEDS

1.1 Concept and purpose of SEIAS

Institutionalizing national policy development and analysis in South Africa

A new system for assessing the impact of policy initiatives, laws and regulations in South Africa was introduced through the Socio-Economic Impact Assessment System (SEIAS). Responding to the concerns around policy impact and implementation failures, it aims to minimise unintended consequences, unanticipated outcomes and unnecessary costs from policy initiatives, regulations and legislation. It further encourages the anticipation of implementation risks and identifies measures to mitigate these risks. With Cabinet approval and effective governance structures, which provide oversight on the implementation of SEIAS across whole of Government, the system effectively institutionalizes policy development in South Africa. The detailed SEIAS guidelines provide the basis for the rationale and implementation of SEIAS[2]. This evidence guide supplements and contributes to the National Policy Development Framework of 2020[3]. The SEIAS methodology is used to guide the 'How-to' note for evidence (part II), demonstrating the depth and breadth of what evidence is needed to implement the SEIAS.

SEIAS for the public good

SEIAS is conceptualized on the principle of social justice, impacting on the broader public. The system emphasises that in a deeply unequal society like South Africa, any policy will have unequal impacts. Implementing policies will incur regular costs to achieve Government's national priorities. SEIAS ensures that in assessing impact realistically, the costs and benefits must be measured and analysed for *different social groups* across society for effective comparisons. The analytical work in undertaking the SEIAS, depends on how policies are designed, a deep understanding of the causal path of social problems and how the proposed policy intervention/s are expected to influence the lives of beneficiaries. It is also aimed at changing the behaviour of stakeholders inside and outside of Government.

The responsibility for the process of designing, strategizing, planning, monitoring, implementing and evaluating public policy lies with public officials, whether at national level (policy development) or at the forefront of service delivery (implementing policy). Defending policy options with a sound evidence trail will yield convincing arguments for proposed policy, regulation and legislation that needs to travel through the path for approval from the Executive through to the Legislative arms of the State. The SEIAS team has called on public officials to take charge of this system, where departments must take ownership in the drafting, completion and submission of the impact assessment report. This report can only be fully conceived and concluded with the assistance of various business units within a department.

Public officials at all three spheres of Government depend on the availability of different types of evidence at every stage of the policy process to assess impact comprehensively. Implementing SEIAS successfully and effectively ultimately depends on a professional public service, that is capable of effective policy analysis and using the best available evidence at all times to defend policy decisions.

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[2] See http://www.thepresidency.gov.za/SEIAS
[3] Refer to appendix E of the Framework, which can be accessed:
https://www.gov.za/sites/default/files/gcis_document/202101/national-policy-development-framework-2020.pdf

SEIAS Theory of Change

SEIAS as a system as well as a process needs to be understood and adopted across Government in policy development. A recent review of SEIAS evaluates the underlying logic of its concept[4]. Inherent in the logic and in the entire methodology is the assumption that the most credible and relevant information/evidence is available and that public officials (including academic partners) are able to synthesise a body of evidence to assess policy impact and inform the SEIAS, which in itself will permit better policies. The SEIAS team has taken up the recommendation of strengthening the SEIAS Theory of Change (ToC), as reflected in Figure 1. The overall goal of SEIAS is an improved policy environment for governance, economic- and social development. Increased approvals of SEIAS prescripts, together with improved Government capacity is expected to lead to quality in policy development to effect social change. The system must be adequately resourced in terms of human, financial, infrastructural and informational inputs which needs to be translated into a well-functioning and institutionalized process within the South African government.

SEIAS evidence needs

The departure from the standard Regulatory Impact Assessment (RIA) procedure, which focussed exclusively on costs to the economy in the past, makes the current SEIAS different. It is more balanced in addressing national priorities using an integrated methodology in assessing impact on social change, including economic costs. Putting the SEIAS theory of change into motion is dependent on various sources and types of evidence for assessing outcomes and impact. The SEIAS methodology has direct implications on Government's capacity to develop sound, effective and evidence-based policy initiatives.
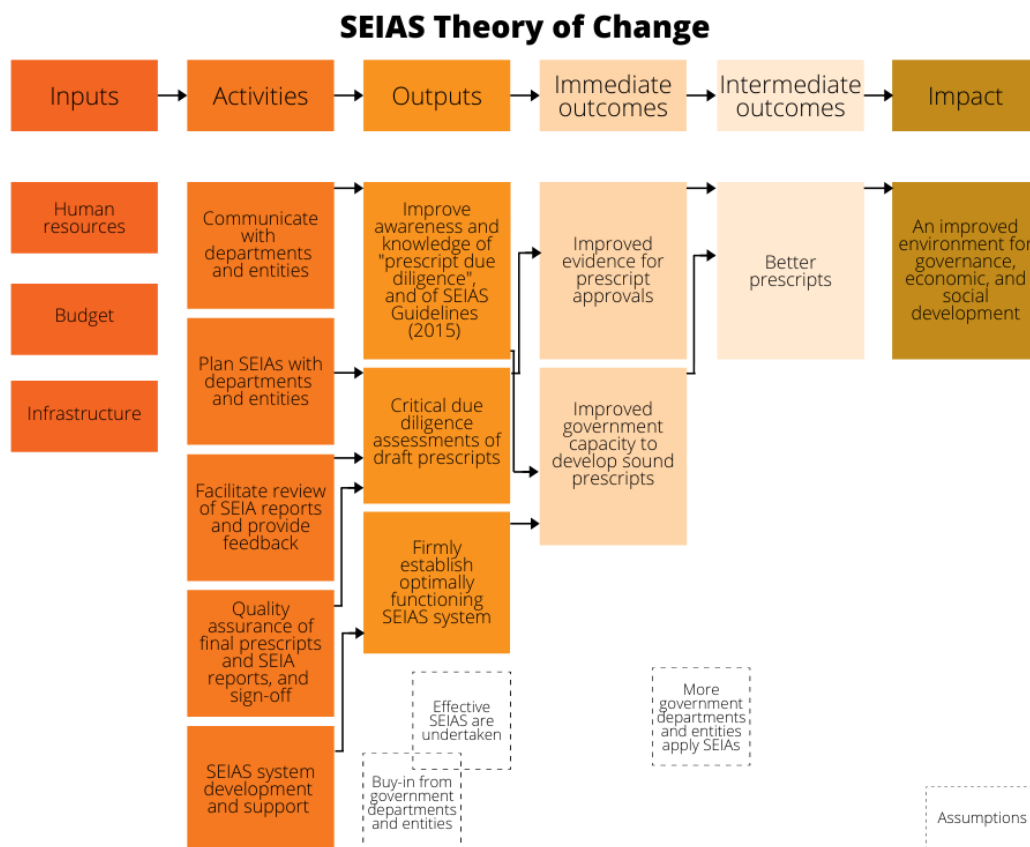

Figure 1: SEIAS Theory of Change, 2019. Source: Policy Research Services.

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[4] Trade & Industrial Policy Strategies (TIPS) (2017) *SEIAS Review*. Discussion document.

These considerations provide the rationale for identifying relevant evidence needs around the six stages in the SEIAS policy process. Table 1 outlines the six SEIAS policy stages with the related evidence needs. Policies, acts and regulations will require different types of evidence. Hence evidence needs for completing the SEIAS process are extensive, which ultimately broadens the definition of what constitutes evidence for policy. This is further elaborated on in part II of this guide.

Table 1   SEIAS policy process and related evidence needs

SEIAS policy process	Evidence need
i. **The decision to develop (or amend) policies, regulations or legislation in order to address an identified social- or economic problem**	▪ Contextual analysis ▪ Diagnostic evidence ▪ Monitoring evidence (*incl. administrative data e.g. crime and health statistics*) ▪ Quantitative evidence (*e.g. surveys, statistical publications by Stats SA*) ▪ Qualitative research (*e.g. interviews, focus groups*) ▪ Evaluation evidence ▪ Stakeholder positions on the policy
ii. **An initial assessment involving:** - **Problem identification and root cause analysis** - **Identification of options for addressing the problem** - **Rough evaluation of the costs and benefits of each option for different social and economic groups**	▪ Forecasting ▪ Diagnostic research evidence ▪ Diagnostic evaluation ▪ Program theory ▪ Program planning ▪ Cost benefit/economic analysis ▪ Standard costing model ▪ Outcome mapping on different target groups
iii. **Agreement on the basic option and finalization of the draft policy initiatives, regulations or legislation in a process that includes consultations and a continual review of the impact assessment as the proposals evolve**	▪ Resource planning ▪ Economic modelling ▪ Stakeholder consultations ▪ Monitoring and evaluation evidence ▪ International case studies ▪ Diagnostic research evidence
iv. **Development of final impact assessment that provides a detailed evaluation of the likely effects of the legislation in terms of implementation and compliance costs as well as the anticipated outcomes**	▪ Monitoring evidence (*incl. administrative data*) ▪ Trend analysis ▪ Cost benefit analysis ▪ Impact evaluations ▪ Intra/inter-departmental and agencies inputs
v. **Publication of the draft policy initiatives, regulation or legislation for public comment and consultation with stakeholders**	▪ Stakeholder consultations ▪ Citizens' views
vi. **Revision of the draft and final assessment based on comments from the public, stakeholders – for approval**	▪ Political and stakeholder positions

1.2 Evidence capacities to achieve developmental priorities

SEIAS offers a standardized methodology with established governance structures. It is therefore an institutionalized approach across the South African Government that ensures public policies, regulations and legislation are effectively designed and implemented to achieve developmental

priorities. The concept of SEIAS makes the case for a strategic entry point for EBPM and EIDM to take root across the South African Government. Without a focus on how to generate, source, engage and use evidence, SEIAS will be difficult to sustain and runs a higher risk of not achieving the desired outcome of better laws and regulations for a better society.

Findings from the SEIAS review of 2017 point to the difficulties in conducting the initial impact assessment by departments, which is highly evidence-dependent. The challenges are specifically related to effective sourcing and analysis of the evidence base informing the policy review, together with a summative evaluation of the chosen option. Government must also take into its analysis, the views and positions of all stakeholders to derive the best options for the broader public good. Participatory processes are difficult to convert into evidence needed for the implementation of the SEIAS. Furthermore, the 2017 review findings point to other factors that lead to poor policy proposals, which SEIAS cannot fully address. These include capacity, time and resource constraints, which limit the space for dedicated research to test the arguments and assumptions that underpin policy proposals.

Evidence management[5] becomes a critical skill in the collation, storage and curation of a body of different evidence types, as well as stakeholder engagements to ensure inclusive voices. Building evidence management capacity <u>before</u> a SEIAS is initiated (i.e., in anticipation of), as well as <u>after</u> a SEIAS is concluded, will strengthen organizational capability in using evidence for policy in a sustained manner. By understanding the strategic value of evidence management, the department's internal evidence products are secured, protected and made accessible in the production of knowledge, while relevant external evidence is also sourced and consulted.

The extent to which consultants are used in the SEIAS process must be defined as per the SEIAS methodology. External experts may be needed for specific technical analysis or primary data collection. SEIAS requires that final reports be completed by senior public officials, which requires a dedicated team and unit to be committed to the process within departments. Effective and continuous evidence management will strengthen a department's position to undertake a SEIAS when needed.

> **How can evidence synthesis enhance the benefits of EBPM**
>
> <u>Increasing reliability:</u> Evaluations of what works and what doesn't work are more reliable when based on a synthesis of a set of individual evaluations rather than a single study.
>
> <u>Unintended consequences:</u> Doing harm can be avoided if a body of knowledge is consulted bringing together evidence from different contexts, population groups, and program approaches, rather than evidence from single studies in limited contexts.
>
> <u>Building trust:</u> Defensibility and transparency is enhanced if policy-makers can say that they looked at an entire body of knowledge rather than a single study or a commissioned report.
>
> <u>Leave no one behind:</u> The larger the evidence-base, the smaller the risk of overlooking studies representing particular voices.
>
> *Africa Centre for Evidence, EBPM in South Africa*

Finally, considering the SEIAS Theory of Change and its related evidence needs, a key capacity linked to EBPM is **evidence synthesis**. The departure point is that an entire body of studies or collection of evidence sources will be more useful to inform a policy review process than using single studies or evidence sources from specific sectors. A body of evidence, including various types generated from multiple sources, will lead to a more comprehensive analysis and synthesis for an effective SEIAS. The process of evidence management implies that Departments will have to stay on top of

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[5] "Evidence management" is a term derived from practice, and in response to managing high volumes of outputs within the demand space. It means discovering, sourcing, storing, organizing, curating, packaging, sharing and constantly facilitating use of all types of evidence in its documented versions. It is differentiated from "knowledge management" as the more generic practice that does not recognize these critical steps in facilitating evidence-use.

the issues and organise an ever-increasing body of evidence, which further motivates the need for effective knowledge management practices within the department.

1.3 Meeting SEIAS evidence needs

The successful implementation of SEIAS by public officials when proposing new sections to a policy, reviewing components of an existing regulation/policy or, considering a total redesign of legislation have inherent needs for relevant evidence. Meeting these evidence needs requires deliberative processes that involves five areas of action: (i) adopting a policy relevant research methodology; (ii) following a systematic approach to measuring impact; (iii) constructing thematic evidence bases; (iv) responding within acceptable timeframes; and (v) adopting an effective public-private partnership model in working with experts.

i. Policy relevant research methodology

Qualitative, quantitative or mixed-methods research methodologies are used for primary research or single study projects to address specific research questions. Implementing SEIAS requires a synthesis approach that identifies, sources and summarises various bodies of evidence to enable a comprehensive analysis of the policy. SEIAS does not attempt to answer a specific research question or a few objectives; rather it requires a review of all the components (diagnosis, options, planning, strategizing, costing, implementing, evaluating) associated with the design and implementation of policy. Evidence synthesis methodology is most appropriate and relevant for rigorous policy evaluations to be undertaken, and hence is the recommended methodology in the implementation of SEIAS. The most widely accepted definition of evidence synthesis refers to the methodology as "the review of what is known from existing research, using systematic and explicit methods in order to clarify the evidence base"[6].

Evidence synthesis methodology and systematic reviews adhere to strict evidence standards and scientific methods. The methodology has been adapted for use in the South African public sector to inform policy research, where a seven-step approach[7] has been developed and used across key high-level policy areas. These steps are applied in part II of this guide. The evidence bases produced out of this synthesis methodology are a rich source of credible and relevant evidence to inform every stage of policy development. The collective evidence can also be visualized effectively through evidence maps – a strategic knowledge management tool that organizes all the various bodies of work relevant to the policy, and which enable rapid responses to knowledge needs.

ii. Systematic approach to measuring impact

The SEIAS builds on two fundamental approaches to evaluating the impact of a new rule. Firstly, it depends on a **technical analysis** where researchers and experts in the field draw on published studies and complex simulations on how the new rule will likely affect different groups in society. Secondly, due to the extensive consultation with stakeholders, **participatory research methods** are used to obtain an assessment of the potential impact of the new rule from those most affected and knowledgeable about the context.

This implies that evidence will be needed on complex technical evaluations with causal effects of a policy/program measured through experimental designs. However, this will not be legitimate without

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[6] Gough, D., Davies, P., Jamtvedt, G., Langlois, E., Littell, J., Lotfi, T., Masset, E., Merlin, T., Pullin, AS., Ritskes-Hoitinga, M., Rottingen, J-A., Sena, E., Stewart, R., Tovey, D., White, H., Yost, J., Lund, H. & Grimshaw, J. (2020) Evidence Synthesis International (ESI): Position statement. Systematic Reviews 9, pp 155

[7] DPME has developed a seven-step evidence synthesis methodology which includes: i. Develop a policy narrative; ii. Decide on criteria for evidence inclusion; iii. Conduct a systematic search; iv. Extract data and organization of the evidence base; v. Critically appraise the evidence; vi. Present and visualize the evidence; vii. Facilitated engagement and use.

contextualizing the impact through participatory research evidence for affected groups. Currently, South Africa is the only country that is applying SEIAS as a system of assessing public policies and legislation, when compared to international practices. A systematic approach to measuring impact will depend on two fundamental processes: (i) monitoring and tracking systems; (ii) Theory of Change. These are both discussed further in this section.

Monitoring for impact

Implementing SEIAS within reasonable timeframes and addressing the impact question will depend on effective monitoring systems that are already in place within each Government entity. These are based on precise and consistent measures of how the policy intervention is either implemented as planned, or proposed to be implemented (under the new rule). Qualitative and quantitative indicators are core to a monitoring system and designed to assess the performance of an intervention or changes that are expected. SEIAS also requires the inclusion of baselines (the situation before the policy or legislation is implemented) and targets (a specified objective that indicates the number, timing and location of the output that is to be realised).

> **Use of the term "Impact" within the Impact Evaluation community**
>
> There is a long tradition in evaluation literature defining the term "impact" as long-term effects of a development intervention. For example, the Organisation for Economic Co-operation and Development's Development Assistance Committee defines impact as "positive and negative, primary and secondary, long-term effects produced by a development intervention, directly or indirectly, intended or unintended" (OECD 2002). In this sense, any evaluation that refers to impact indicators is an impact evaluation (IE)—for example, participatory impact assessments, which rely largely or solely on qualitative approaches (3IE 2009).
>
> However, in the IE community – including at the World Bank Group – impact is used to denote causal effects of a program on outcomes, whether immediate, intermediate, or final. For instance, Gertler and others (2011) define IEs as "a particular type of evaluation that seeks to answer cause-and-effect questions. Unlike general evaluations, which can answer many types of questions, IEs are structured around one particular type of question: what is the impact (or causal effect) of a program on an outcome of interest?" Similarly, according to the International Initiative for Impact Evaluation, "High-quality impact evaluations measure the net change in outcomes that can be attributed to a specific program." Consistent with the terminology used in the IE community and at the World Bank, this guide uses the term impact to mean **causal effects of an intervention, irrespective of the time dimension of the outcomes of interest**.
>
> *World Bank, Independent Evaluation Group*
>
> *Source: Vaessen, J. Lemire, S & Befani, B. (2011) Evaluation of International Development Interventions – An overview of approaches and methods. World Bank Group. Independent Evaluation Group*

Data and the evidence generated to monitor program or policy interventions come from several levels: client, program, service environment, population, and geographic levels. Regardless of level, data are commonly divided into two general categories: routine and non-routine:

Routine data sources provide data that are collected on a continuous basis, such as information on beneficiary data that departments collect for targeted interventions. Although these data are collected continuously, processing them and reporting on them usually occur only periodically—for instance, aggregated monthly and reported quarterly. Routine data, also referred to as administrative data, is usually collected for reporting purposes, but has huge power for real-time research and analysis.

Non-routine data sources provide data that are collected on a periodic basis, usually annually or less frequently through surveys or special data collection for research purposes. Sources vary from official statistics, to universities, science councils and other research institutes.

Theory of Change

A Theory of Change (ToC) is an understanding of how an intervention (policy, program, strategy) is expected to deliver the desired results. It describes the 'causal logic' of how and why the intervention under focus will achieve its intended outcomes. It describes a sequence of events and is central to any impact evaluation. It is also the starting point of the evaluation design. There are many ways to model a ToC, one of which is the results chain. This sets out how the core elements used in developing a ToC are related to each other to lead to the desired result/impact as shown in Figure 2.
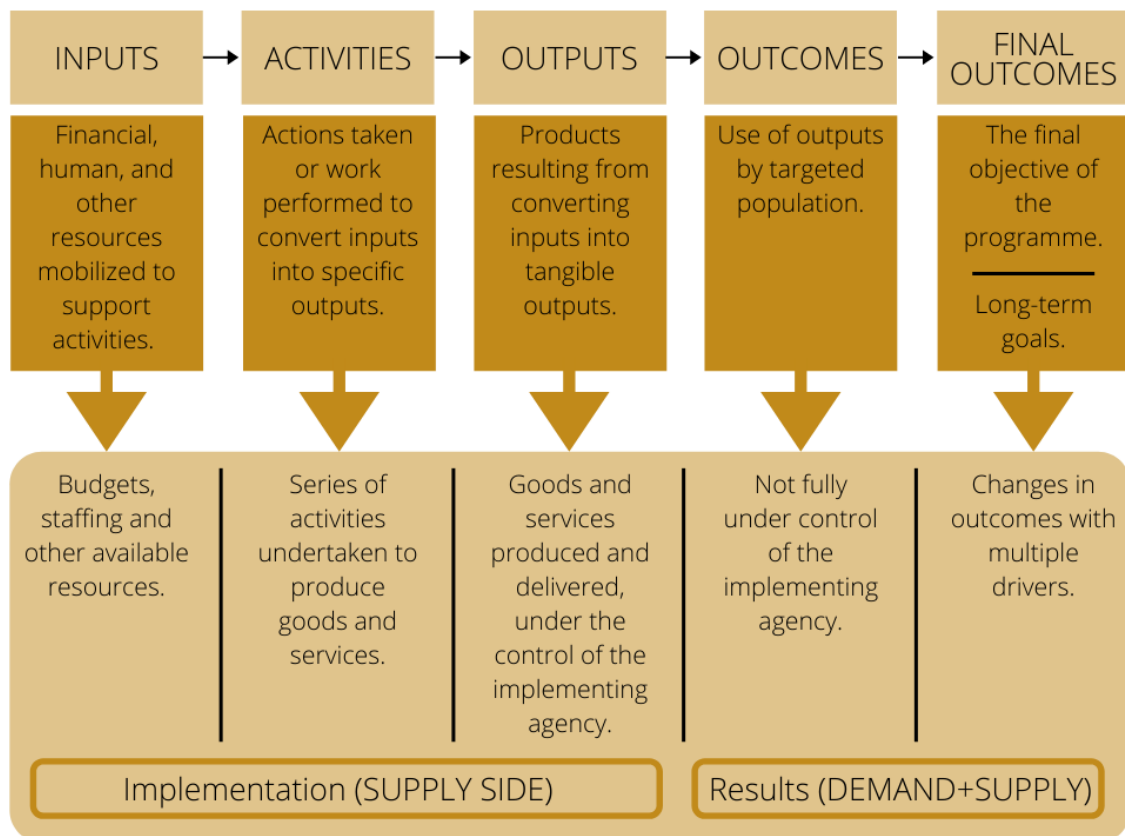

Figure 2 Elements of a results chain. Source: Gertler, P.J., Martinez, S., Premand, P., Rawlings, L.B. & Vermeersch, C.M.J (2011). Impact Evaluation in Practice. The International Bank for Reconstruction and Development. The World Bank Group

The results chain has three parts that need to be understood from an evidence perspective (table 2):

Table 2   Components of the results chain[8]

1. IMPLEMENTATION	– which involves monitoring evidence on project inputs, activities and outputs, delivered by the implementing agency.
2. RESULTS	– those outcomes that lead to intended results even though not under direct control of the project. It is measured through the changes observed in beneficiaries. This depends on the interactions between implementation and beneficiaries.
3. ASSUMPTIONS/RISKS	– any evidence that shows whether the causal logic will not be realized in the way it was planned.

In applying the ToC and results model to SEIAS, the following definitions (table 3) are provided in measuring impact, which are linked directly to the evidence type and sources discussed in the next section.

Table 3   Definitions within the Theory of Change[9]

Impact	The organisational, community, social and systemic changes that result from the policy or legislation.
Outcomes	The specific changes in participants (i.e., beneficiaries) behaviour, knowledge, skills, status and capacity.
Outputs	The amount, type of degree of service(s) the policy or legislation provided to its beneficiaries.
Activities	The identified actions to be implemented
Input	Departmental/Public resources used in order to achieve policy or legislative goals i.e., personnel, time, funds, etc.
External conditions	The current environment in which there's an aspiration to achieve impact. This includes the factors beyond control of the policy or legislation (economic, political, social, cultural, etc.) that will influence results and outcomes.
Assumptions	The facts, state of affairs and situations that are assumed and will be necessary considerations in achieving success.

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[8] Better Evaluation. Impact Evaluation. Accessed: 30 September 2020.
https://www.betterevaluation.org/en/themes/impact_evaluation#ImpactEvaluation_3.
[9] Ibid

iii. Constructing thematic evidence bases

Government has the responsibility to design and implement relevant public policy, be it sectoral or cross-cutting. As custodians of specific legislative and regulatory expression of the Constitution of the Republic of South Africa, 1996, line function departments have direct information on what outcomes (immediate, intermediate and long-term) are expected if their policies are implemented well. Interventions in the form of programs, strategies and resources are monitored by line function departments and progress (or lack thereof) is held in check through regular reporting and accountability channels. Various thematic evidence bases (e.g., Early Childhood Development; SMMEs; Human Settlements) can be generated by public institutions, which will include various types of evidence. Consensus by stakeholders is needed on what type of evidence is included in these evidence bases, since research and academic sources are only one type of evidence that informs policy. The following are broad categories of the different types of evidence that should be included:

Primary studies	**SA Grey literature**
• Impact evaluation *(studies with a control group/counterfactual e.g., Randomized Control Trials)* • Qualitative primary studies *(e.g., case study, interviews)* • Quantitative primary studies *(e.g., surveys)* • Program evaluations *(e.g., evaluation of state/IGO/NGO interventions)* • Statistical data and information	*(Research evidence that is not published in peer-reviewed or searchable databases)* • Government reports • SA expenditure reviews • SA program evaluations by departments • SA citizen-based views and perception studies • Report from consultancies
Evidence synthesis	
• Systematic review with or without meta-analysis • Qualitative evidence synthesis • Meta-analyses *(not systematic review)* • Other review *(e.g., literature review, overview of case studies, comparative studies)*	

Figure 3   Categories of evidence. Source: Complied by DPME Research and Knowledge Management Unit

iv. Responding within acceptable timeframes

The implementation of a SEIAS occurs within agreed timeframes. Once the process is initiated, public officials are required to source, generate and analyse relevant evidence needs, especially during the Initial Impact Assessment (IIA). At this stage, existing internal and external departmental evidence will become a valuable resource. Where existing information is not available, additional time will be needed to adequately source and organize the evidence in the generation of an evidence base relevant to the policy being reviewed. Costs in undertaking a SEIAS can be minimised where national departments have functional research, monitoring and evaluation processes and systems in place. Even where external expertise is contracted, the procurement processes can cause delays and frustrations that undermine the effectiveness of SEIAS. Finding the experts, defining their inputs and integrating their contributions into the overall SEIAS can be time consuming and cause further delays. Organizational infrastructure like research repositories, access to databases and search facilities to find the evidence, will assist greatly in sourcing the relevant and critical evidence for timely responses.

v. Effective public-private partnership model in working with experts

Extensive stakeholder engagement and management is a critical requirement of the SEIAS methodology. Networks and relationships are also a core function of EIDM if legitimacy of the process is to be ensured. Public officials are therefore required to adopt a collaborative approach in building relationships with academia, think-tanks, activists and citizens where there is consensus on

what constitutes evidence by relevant stakeholders/social groups and will be of equal value for consideration in the SEIAS. This is especially the case when various voices, positions, lobbyists and advocates compete to influence the policy agenda, and scientific evidence is not regarded as the only source of evidence to inform policy. Government is a social partner and also a producer of evidence, specifically on performance. Thus, officials may not be neutral in the policy development process.

An embedded **co-production model** is recommended as an effective public-private partnership model to guide how Government officials work with external partners, especially experts in the field. This model is useful where public officials address the politics of knowledge production through the establishment of effective governance and management structures to oversee the SEIAS process from the onset. The co-production approach inherently requires officials to relook at how knowledge resources are generated and secured for Government and how to establish long term collaborative partnerships with researchers, experts and academics in the generation of evidence to inform the SEIAS.

PART II – How-to guide

2.1 Three stage approach towards implementing the SEIAS

The SEIAS concept and purpose was discussed in part I of this guide. It becomes apparent that implementation of the SEIAS depends on effective sourcing, analysing and synthesising of the best available evidence of various types and from multiple sources. For this reason, part II puts focus on the 'how-to' of evidence-use, specifically related to SEIAS. A three-stage approach is provided in addressing the evidence needs when implementing SEIAS. The first two stages are preparatory in nature and determine the organizational capacity and readiness of a department to undertake any review with regard to knowledge management, institutional memory and existing informational systems. Individual capacity building through the training offered by SEIAS in completing the templates are complemented with building organizational capacity regarding informational and knowledge management systems.

The following three-stage approach in using evidence for SEIAS is provided below and elaborated further.
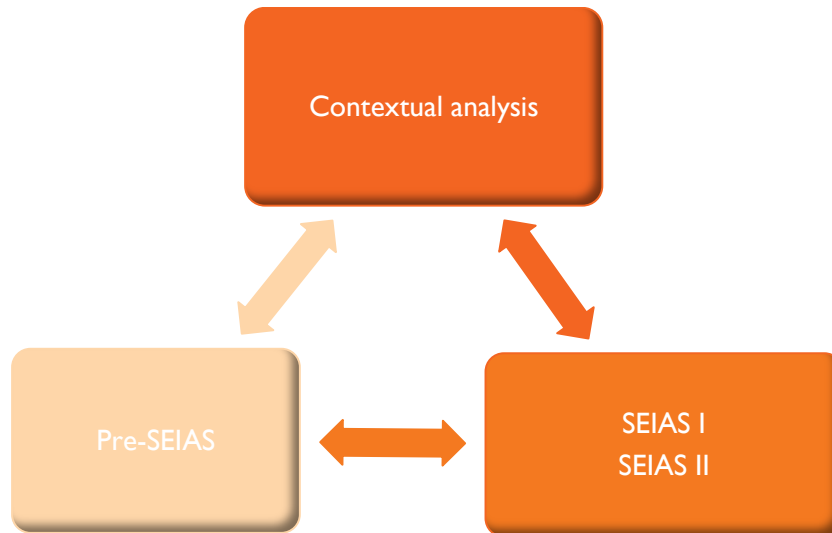
Figure 4 Three-stage approach for implementing SEIAS

2.2 Contextual analysis (strategic level)

Contextual analysis is derived from a deep historical understanding of the existing policy and its related programs, regulations and performance measures. Line function departments at national levels are mandated to develop sectoral policies, regulations and legislation. These sectoral policies need to be aligned to developmental priorities and the National Development Plan (NDP). It draws on departmental Strategic Plans, Annual Performance Plans and budget priorities, as well as citizens' experience of how the policy is being implemented and to what effect. Data and information are derived from existing monitoring systems and regular evaluations undertaken whereby managersassess whether targets are being met. These constitute performance measures by the department which need to be reviewed against baselines, progress tracked and adjustments made in order to ensure achievement of national priorities.

The current strategic direction, which guides the work of the whole of Government, is encompassed in seven priorities as set by the 2019-2024 administration. Officials have the responsibility to align the work of their departments to these priorities and demonstrate how their programs, plans and strategies are contributing to the overall impact on South African society. These seven priorities[10] are:

1. A capable, ethical and developmental state
2. Economic transformation and job creation
3. Education, skills and health
4. Consolidating the social wage through reliable and quality basic services
5. Spatial integration, human settlements and local government
6. Social cohesion and safer communities
7. A better Africa and world

2.3 Pre-SEIAS

A pre-SEIAS stage provides for public officials to start thinking through the overall process of planning, monitoring and evaluating public policies in a systematic, transparent and sustained manner. Whether a SEIAS is needed for a specific policy review or not, the practice of generating, sourcing, organizing and making an evidence base easily available within a department is an advantage. It enables public institutions to effectively analyse and synthesise evidence in a timely manner for reporting as well as continuous analysis and improvement. This forms the basis of an effective knowledge management system for the public sector.

Departments are already obligated to have a document management system in compliance with the Promotion of Access to Information Act 4 of 2013 (PAIA). This can be strengthened to build a knowledge repository of internal and external evidence for the core purpose of research and analysis in public policy making. In the specific case of implementing a SEIAS (when there is no availability of an organized evidence repository), this stage has the potential to generate awareness of the need to store all the evidence that informed the SEIAS in a way that can help build a departmental knowledge system as a future resource.

SEIAS as a system
Assessing impact is a complex and data-dependent process, using all the evidence types discussed under part I. Public programs that have a large footprint in the country, are implemented at multiple sites, and which require technical inputs with a dedicated budget over an extended period of time, demonstrate the complicated nature of public programs. This complexity necessitates careful planning and preparation for an impact assessment to be conducted using systems thinking.

SEIAS, conceptualized as a system, is dependent on information and evidence generated by different teams/agencies with complementary expertise, skills and contributions from partners internal and external to Government. SEIAS evidence needs was discussed in part 1 of this guide. The six-stage SEIAS policy process is specific to SEIAS methodology to ensure successful implementation and conclusion of the process. Developing the system of assessing overall impact requires officials to use the comprehensive policy framework to understand multiple entry points of evidence at any stage of

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[10] Medium Term Strategic Framework (2019-2024)

the policy. The following figure 5 is an overall conceptual understanding of the policymaking cycle, which includes policy formulation, policy adoption, policy implementation and policy evaluation.
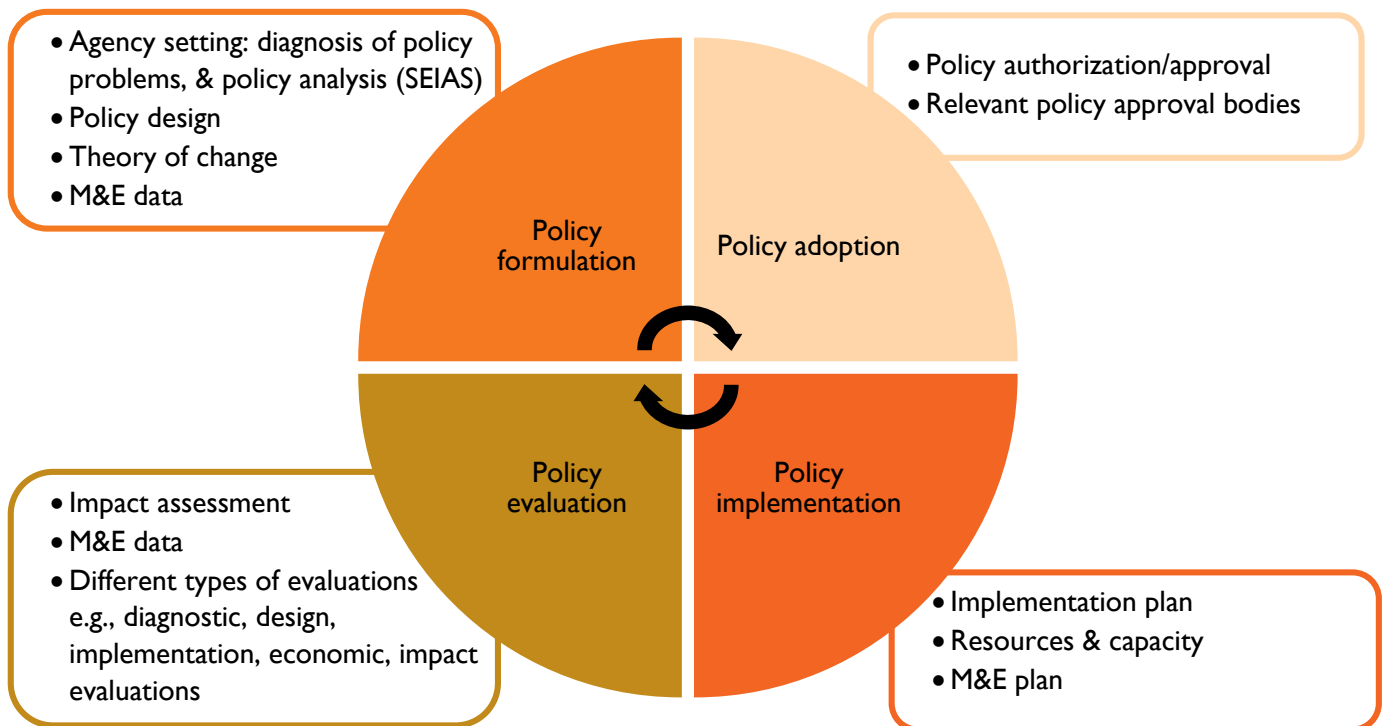
- Agency setting: diagnosis of policy problems, & policy analysis (SEIAS)
- Policy design
- Theory of change
- M&E data

- Policy authorization/approval
- Relevant policy approval bodies

Policy formulation

Policy adoption

Policy evaluation

Policy implementation

- Impact assessment
- M&E data
- Different types of evaluations e.g., diagnostic, design, implementation, economic, impact evaluations

- Implementation plan
- Resources & capacity
- M&E plan

Figure 5 SEIAS policy making cycle. Source: Policy and Research Services, The Presidency.

Generating an evidence base to assess impact

DPME's revised framework for Strategic and Annual Performance Plans has adopted the results-based approach where steps are outlined for each of these four phases outlined in figure 5. An evidence base including different evidence types (refer to section 1.3 of this guide) can be generated for every policy, legislation or regulation any department is responsible for and aligned to the new Strategic and Annual Performance Plans. Ideally, each intervention by the department should have an explicit theory of change. This explains the expected pathway/s to change where observable outcomes will lead to the desired impact. Even if a ToC is not documented or made explicit, the following information (table 4) will serve to build an evidence base. It should be organized according to agreed categories and themes for all officials in the department to be able to easily access the information for management decisions. The evidence behind these categories/themes can be stored according to the steps and evidence types as sub-folders per policy area within the research repository of the department's intranet.

Table 4   Contents of an evidence base per phase when evaluating policy

Phase	Steps	Questions/information generated	Example of evidence types
Policy formulation	Diagnosis / Situational analysis	• Analysis of the status quo • Indicate the problem or opportunity and root causes • Which social groups are mostly affected by the problem and how are they affected? • Consultation with clients and stakeholders in understanding the situation/existing interventions and programs	Primary research Diagnostic Participatory research Root cause analysis Behavioural science
	Analysis of options	• Analysis of options for addressing the problem • Determination of cost-benefit of different options • Motivation of intervention/program as the selected option	Research synthesis Forecasting & Modelling *(which generates scenarios and projections for planning purposes, e.g., Computable General Equilibrium)* International comparison Administrative data analysis Performance reviews
Planning and adoption	Program design	• What resources are needed for implementing the policy? • Design of plan and description of how the program contributes to institutional outcomes and developmental priorities • Outlining the relationship with the outputs of any other existing or planned programs, within an institution or sector	Design evaluation Applied research
	Target group	• Definition of beneficiaries/ client/ target group in some qualitative and/or quantitative way	Participatory research Beneficiary data analysis Behavioural science
	Theory of Change	• Theory of Change is required to address the problem or opportunity • Provide the explanation of the causal mechanism of how activities and outputs will result in anticipated outcomes, impact statement and assumptions involved • What are the potential risks? • What assumptions need to be tested?	Monitoring evidence Scientific research Program evaluation Participatory research Performance dialogues
Implementation / Monitoring	Log frame	• Development of a log frame to operationalize the Theory of Change into the Theory of Action • Build in different levels of the results chain, indicators, baselines and targets • State the key assumptions and risks which underpin the results chain	Organizational / departmental research and evaluation reports Monitoring data (administrative) Indicator tracking
	Operational planning, management and resourcing	• Indication of roles and responsibilities of internal and external stakeholders • Assessment of whether the roles and responsibilities contradict or duplicate any existing institutional arrangements	Organizational assessment/monitoring Performance dialogues Implementation evaluations Budget projections Performance monitoring and reporting

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		• A risk management plan should be compiled that includes key risks to the success of the program, consequences of the outputs, their probability and impact, and measures to mitigate identified risks	
Evaluation	Cost estimates	• Cost estimates of inputs required to achieve outputs in the log frame	Performance and expenditure reviews
	Assess achievement of results	• A life-cycle evaluation of the program – to assess the outcomes and impact	Outcome evaluation Impact evaluation
	Improvement plan / decision on future of intervention	• Recommendation for improvement and decision making on reviewing the purpose and design of the intervention	Performance dialogue Performance evaluation Impact evaluation

Source: Compiled by DPME Research and Knowledge Management unit

Evidence synthesis methodology

Part I of this guide provided the rationale for why evidence synthesis methodology is needed to implement a SEIAS, which requires engagement with a wide range of evidence types from various sources (refer to table 4). The results chain used to explain the causal logic of the policy intervention provides the organizing frame for the synthesis approach. Synthesis methodology draws from multiple studies to arrive at a conclusion or judgement on an intervention and its outcomes. Systematic reviews are the gold standard for synthesis methodologies, and have been adopted in policy reviews successfully. The following are broad steps to follow in using evidence synthesis methodology:

1	Define the policy narrative/statement including the key interventions and expected outcomes
2	Agree on the which types of evidence to include in the SEIAS (drawing from the SEIAS policy cycle and related evidence needs)
3	Undertake a systematic search for evidence internal and external to the department
4	Organize the evidence according to the SEIAS steps, keeping track of all the full texts
5	Extract data, information and evidence to answer the SEIAS questions posed (SEIAS I & II)
6	Use external and other scientific evidence to validate and triangulate for rigor. Critically appraising the evidence will ensure reliability as well as legitimacy in reporting
7	Update and maintain the evidence base to defend the SEIAS options and referencing

Figure 6 Seven step synthesis methodology for SEIAS

Assessing impact

Academia and researchers assess impact using rigorous methods and claim the gold-standard in proving causality. These are known as Randomised-Controlled Trials (RCTs) where a counterfactual and randomization of the sampling strategy give the methodology its 'gold' status. Difficulties with randomization in social sciences due to contextual realities and dynamic shifts (as compared to natural and health sciences) has resulted in less RCTs available for synthesing.

An impact evaluation at a programmatic level is usually undertaken to improve or reorient an intervention (i.e., for formative purposes) or to inform decisions about whether to continue, discontinue, replicate or scale up an intervention (i.e., for summative purposes). More often, an impact evaluation is used for summative purposes. Ideally, a summative impact evaluation does not only produce findings about 'what works' but also provides information about what is needed to make the intervention work for different groups in different settings. Determining causal attribution is a requirement for determining 'impact' in an evaluation. Hence, it is particularly important that impact evaluation is addressed as part of an integrated monitoring, evaluation and research system that generates and makes available a range of evidence to inform decisions.

Assessing impact at a policy level needs to address three sets of questions for more comprehensive measures, namely descriptive, causal and evaluative questions. These questions collectively generate the evidence used to assess the underlying Theory of Change (ToC) behind each policy intervention. The box below provides clarity on these sets of questions.

1	**Descriptive questions**	Ask how things are (pre-existing) and what has happened, i.e., these questions describe the initial situation and how it has changed; the activities of the intervention and other related programs or policies; the context in terms of recipient characteristics; and the implementation environment.
2	**Causal questions**	Ask whether or not, and to what extent, observed changes are due to the intervention being evaluated rather than to other factors, including other programs and/or policies.
3	**Evaluative questions**	Ask about the overall conclusion as to whether the intervention can be considered a success, an improvement or the best option given the context under implementation.

When implementing SEIAS, the questions being addressed are further guided by **evaluative criteria** by which a policy intervention is judged. This enables a Government department to generate the evidence needed. Impact criteria are distinguished from the other evaluative criteria (table 5):

Table 5:   Evaluative criteria[11]

Relevance	The extent to which the objectives of an intervention are consistent with recipients' requirements, country needs, global priorities and partners' policies.
Effectiveness	The extent to which the intervention's objectives were achieved, or are expected to be achieved, taking into account their relative importance.
Efficiency	A measure of how economic resources/inputs (funds, expertise, time, equipment, etc.) are converted into results.
Impact	Positive and negative primary and secondary long-term effects produced by the intervention, whether directly or indirectly, intended or unintended.
Coverage	The extent to which the respective interventions reached the intended target group and were taken up.
Coordination	Horizontal coordination between sectors (e.g., DSD-DBE-DSBD) and vertical coordination between national, provincial, district, municipality.
Protection	Extent to which individuals and communities were protected against loss of life as well as livelihoods.

2.4 SEIAS I – Initial Impact Assessment

Identifying the challenges of the existing policy or program is the starting point in assessing and analysing its impact. Are challenges related to theory/design failures or are the challenges as a result of specific implementation challenges? Experts in impact evaluation designs offer the following overall guide (table 6) which is a useful starting point when thinking through SEIAS I:

Table 6:   Measuring impact[12]

Needs assessment	What is the problem?
Program theory assessment	How, in theory, does the program contribute to the overall objectives or policy imperatives of the department?
Process evaluation	Did the program work as planned? For whom did it work and under what circumstances did the program work?
Impact evaluation	Were its goals achieved? What is the magnitude of this impact?
Cost effectiveness analysis	Given the magnitude and cost, what are the alternatives and how does the current situation compare?

[11] Better Evaluation. Impact Evaluation. Accessed: 30 September 2020.
https://www.betterevaluation.org/en/themes/impact evaluation#ImpactEvaluation 3.
[12] Abdul Latif Jameel Poverty Action Lab (J-PAL) (2019). Evaluating Social Programmes. J-Pal Africa. Course overview, Cape Town

SEIAS requires the following conceptual framework, problem statement, aims, and Theory of Change to be completed for which evidence is derived from the constructed evidence bases.

1. The problem/Theory of change

1.1. What is the social or economic problem that you are trying to solve?
1.2. What are the main causes of the problem? That is, why does the problem arise and why does it persist?
1.3. Whose behaviours give rise to the problem, and why does that behaviour arise?
1.4. Why is implementation of the existing policies/laws/regulations or any proposals not effective in addressing the identified problems?
1.5. Who are the major social and economic groups affected by the problem, and how are they affected? Who benefits and who loses from the current situation?
1.6. Which of the seven top priorities of the State are negatively affected by the identified problem?
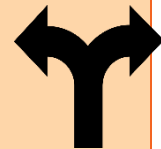
2. Options *(remember this is a think tool, so explore the options freely)*

2.1. Describe at least three options for addressing the identified problem, including (a) your preferred proposal, and (b) an option that does not involve new or changed regulation (baseline or existing option).
2.2. Are the proposed options linked to other existing Government laws or regulations and what are the gaps/limitations of those existing ones to address your identified problem?
2.3. Which social groups would gain and which would lose most from each of the above options?
2.4. For each option, describe the possible implementation costs, compliance costs and the desired outcomes, listing who would bear the costs or, in case of the outcomes, enjoy the benefits (provide a table of options/implementation, costs/compliance, costs/desired outcomes [benefits]).
2.5. Based on the above table of costs and benefits, describe how different options would contribute to or detract from the national priorities.
2.6. Describe the potential risks that could threaten the implementation of each option and indicate what can be done to mitigate the identified risks.

3. Summary

3.1. Based on your analysis, as reflected in the discussion of the three options above, summarise which option seems most desirable and explain.
3.2. What specific measures can you propose to minimise the implementation and the compliance costs of your preferred option, and to maximise the benefits?
3.3. What are the main risks associated with your preferred option, and how can they be managed best?
3.4. What additional research should you do to improve your understanding of the costs and benefits of the option adopted?

Source: SEIAS I template

2.5 SEIAS II – Final Impact Assessment

According to the SEIAS methodology, the final impact assessment can only commence once the first part (Initial Impact Assessment) is approved by the oversight body. This implies that rigorous use of evidence is needed to implement SEIAS part I where deep analysis of the options are needed. This interrogation of the chosen option is highly dependent on relevant evidence. The following questions are posed in the implementation of the SEIAS, as per the stated SEIAS methodology. This process is facilitated by effective evidence planning as discussed in the contextual and pre-SEIAS stages.

Policy/legislative alignment

Part I: Conceptual Framework, Problem Statement, Aims and Theory of Change

1.1. What socio-economic problem does the proposal aim to resolve?
1.2. What are the main root causes of the problem identified above?
1.3. Summarise the aims of the proposal and how it will address the problem in no more than five sentences.
1.4. How is this proposal contributing to the Seven National Priorities (see section 2.2 of this guide)?
1.5. Please describe how the problem identified could be addressed if this proposal is not adopted. At least one of the options should involve no legal or policy changes, but rather rely on changes in existing programs or resource allocation.

Part II: Impact Assessment

2. 1 Are other Government laws or regulations linked to this proposal? If so, who are the custodian departments?
2. 2 Change
    a.   What and whose behaviour does the proposal seek to change? How does the behaviour contribute to the socio-economic problem addressed?
    b.   How does the proposal aim to bring about the desired change?
2. 3 Consultations
    a.   Who has been consulted inside and outside of Government? Please identify major functional groups (e.g., business; labour; specific Government departments or provinces; etc.); you can provide a list of individual entities and individuals as an annexure if you want.
    b.   Summarise and evaluate the main disagreements about the proposal arising out of discussions with stakeholders and experts inside and outside of Government.
2. 4 Describe the groups that will benefit from the proposal, and the groups that will face a cost. These groups could be described by their role in the economy or in society.
2. 5 Describe the costs and benefits of implementing the proposal to each of the groups identified above (refer to SEIAS template).
2. 6 Cost to Government: describe changes that the proposal will require and identify where the affected agencies will need additional resources.
    a.   Budgets – has the cost to Government been included in the relevant Medium Term Expenditure Framework (MTEF)?
    b.   Staffing and organisation in the Government agencies that have to implement it (including the courts and police, where relevant) – has it been included in the relevant Human Resource Plan?
2. 7 Describe how the proposal minimises implementation and compliance costs for the affected groups both inside and outside of Government.
2. 8 Managing risk and potential dispute

a. Describe the main risks to the achievement of the desired outcomes of the proposal and/or to national aims that could arise from implementation of the proposal.
b. Describe measures taken to manage the identified risks.
c. What kinds of dispute might arise in the course of implementing the proposal, whether (i) between Government departments and Government agencies/parastatals, (ii) between Government agencies/parastatals and non-state actors, or (iii) between non-state actors? Please provide as complete a list as possible. What dispute-resolution mechanisms are expected to resolve the disputes? Please include all of the possible areas of dispute identified above.

2.9 Monitoring and evaluation. Develop a detailed Monitoring and Evaluation Plan, in collaboration with your departmental M&E unit which should include among others the following:

- Clear and measurable policy or legislative objectives
- Theory of Change clearly describing the following components:
  - Impact: the organisational, community, social and systemic changes that result from the policy or legislation;
  - Outcomes: the specific changes in participants (i.e., beneficiaries) behaviour, knowledge, skills, status and capacity;
  - Outputs: the amount, type of degree of service(s) the policy or legislation provides to its beneficiaries;
  - Activities: the identified actions to be implemented
  - Input: departmental resources used in order to achieve policy or legislative goals i.e., personnel, time, funds, etc.
  - External conditions: the current environment in which there is an aspiration to achieve impact. This includes the factors beyond control of the policy or legislation (economic, political, social, cultural, etc.) that will influence results and outcomes.
  - Assumptions: the facts, state of affairs and situations that are assumed and will be necessary considerations in achieving success
- A comprehensive Logical Framework (LogFrame) aligned to the policy or legislative objectives and the Theory of Change. The LogFrame should contain the following components:
  - Results (impact, outcomes and output)
  - Activities and input
  - Indicators (a measure designed to assess the performance of an intervention. It is a quantitative or qualitative factor or variable that provides a simple and reliable means to measure achievement, to reflect the changes connected to an intervention, or to help assess the performance of a development actor)
  - Baseline (the situation before the policy or legislation is implemented)
  - Targets (a specified objective that indicates the number, timing and location of that which is to be realised)
- An overview of the planned evaluation, briefly describing the following:
  - Timeframe: when will the evaluation be conducted?
  - Type: What type of evaluation is planned (formative, implementation or summative). The selection of evaluation type is informed by the policy owner's objective (what it is you want to know about your policy or legislation).
- A straightforward communication plan *(note: a common assumption is that the target group will be aware of, and understand how to comply with, a policy or legislation come implementation. However, increases in the complexity and volume of new or amendment policy or legislation render this assumption false. Hence, the need for a communication plan to guide information and awareness campaigns to ensure that all stakeholders (including beneficiaries) are informed).*

2.10 Please identify areas where additional research would improve understanding of the costs, benefit and/or of the legislation.

Part III Summary and conclusions

3. 1 Briefly summarise the proposal in terms of
   a.   The problem being addressed and its main causes and
   b.   The measures proposed to resolve the problem.
3. 2 Identify the social groups that would benefit and those that would bear a cost, and describe how they would be affected.
3. 3 What are the main risks from the proposal in terms of
   a.   Undesired costs,
   b.   Opposition by specified social groups, and
   c.   Inadequate coordination between state agencies?
3. 4 Summarise the cost to Government in terms of
   a.   Budgetary outlays and
   b.   Institutional capacity.
3. 5 Given the assessment of the costs, benefits and risks in the proposal, why should it be adopted?
3. 6 Please provide two other options for resolving the problems identified if this proposal were not adopted.
3. 7 What measures are proposed to reduce the costs, maximise the benefits, and mitigate the risks associated with the legislation?
3. 8 Is the proposal: constitutional/necessary to achieve the priorities of the state? As cost-effective as possible? Agreed and supported by the affected departments?
3. 9 What is the impact of the proposal to the above Seven National Priorities?

Source: SEIAS II template

2.6 Way forward

Strengthening and sustaining evidence-use in SEIAS

The SEIAS has been institutionalized across Government where public officials are required to implement this system when reviewing and proposing any new rules. The Executive Authority will not consider new policy proposals by any department that has not implemented the SEIAS. The system provides public officials with a powerful analytical tool to ensure that proposals are rigorously reviewed and evidence informed. Every SEIAS implemented, approved and concluded successfully in the passage to promulgation has the potential to build an evidence base and contribute to a public sector knowledge system. Building a system requires public officials to move beyond SEIAS as individual projects.

Evidence standards

Research and other evidence are generated using different methodologies and degrees of rigor. The quality of data and research methods is guided by ethical and professional standards as directed by the national statistical authority and academia. There are also accepted tools and approaches[13] to appraise the quality of different types of research studies and evidence. However, the quality of individual studies cannot be confused with the strength of a body of evidence. For example, while a series of evaluations can be conducted to the highest methodological standard, if all of these studies are conducted in contexts not relevant to South African policy or are evaluating interventions deemed unacceptable by stakeholders, the body of this evidence is of poor quality for decision-making. In the context of SEIAS, the process of evidence generation has already demonstrated the necessity of an extended definition of evidence to include citizens' evidence and various stakeholder contributions.

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[13] This process is collectively referred to as 'critical appraisal'.

This motivates the need for a coherent standard of evidence within the SEIAS process, which rates what bodies of evidence are fit-for-purpose to inform a robust SEIAS assessment. Such an evidence standard would be defined by public sector officials in co-production with academia and would consider dimensions of the strength of the body of evidence including: size, trustworthiness, relevance, and legitimacy. A Government-wide tool that rates the evidence used to inform the SEIAS will equip officials to engage with and use the different types of evidence with confidence. Such evidence standards in the public sector have been successfully used to facilitate the use of evidence in a range of examples including education in the United States and addressing homelessness in the United Kingdom.

Organizational knowledge systems and processes

Attention on processes that lead towards proactive evidence management has been a theme throughout this guide. The SEIAS methodology underscores the development of organizational knowledge systems for undertaking a policy review as well as for ongoing tracking of progress to monitor and evaluate policy impact. Implementing SEIAS generates knowledge assets for the public sector that has the potential to build strong administrative capacity amongst public officials. Drawing from a knowledge system that is constantly updated with the most reliable and quality evidence enables public officials to rapidly source, analyse and respond to policy development in an efficient and effective manner.

Building state capacity

A capable and developmental state is one of Government's top priorities. A functional bureaucracy is needed for the state to deliver on developmental objectives. This depends on public officials having the capacity to design, implement, analyse and evaluate public policy – which forms the basis of an effective and efficient SEIAS. At the core of building state capacity to undertake policy analysis is engaging with and using evidence. SEIAS is thus a multi-faceted system with wider implications for policy development, management and capacity building within the EIDM space.