Technical Note

Independence and Impartiality

Version August 2017

1. Introduction

1. WFP's Evaluation Policy (2016-2021) is based on three UN Evaluation Group (UNEG) principles for evaluation, independence, credibility and utility. While the TN on evaluation principles presented briefly the 3 principles, this TN focuses more specially on the independence and impartiality[1]. It defines and explains the importance of independence and impartiality in evaluation; to make staff aware of potential mechanisms to ensure them.

2. Unlike centralized evaluations commissioned by the Office of Evaluation which is independent from Management, decentralized evaluations (DE) are commissioned by management, and are thus not structurally independent of programmes. However decentralized evaluations must be independent in their management and conduct. To ensure their independence, all WFP evaluations, whether centralized or decentralized, are conducted by independent consultants. In the past in WFP, and still in some organizations, 'self-evaluations' were conducted, whereby WFP staff were part of the evaluation team. In the interests of independence of evaluations, this is no longer a possibility for an evaluation in WFP. Such exercises can be valuable, particularly for team reflection and lesson learning, but they must be planned and managed as reviews–they are not evaluations.

2. Definitions of Independence and Impartiality

3. **Independence** provides legitimacy to evaluation. It reduces the potential for the conflicts of interest, which could arise if policy-makers and managers had sole responsibility for evaluating their own activities.[2]
   - *Evaluators must be independent,* meaning that the members of the external evaluation team themselves must not have been directly responsible for the policy-setting design or overall management of the subject of evaluation, nor expect to be in the near future.
   - *Evaluators must not have vested interests and must be given full freedom to access information,* to conduct their evaluative work impartially and to present their findings based on the analysis of available evidence available.

4. **Impartiality** is a requirement for independence. It necessitates that evaluations are free from influences that may bias their selection, conduct, findings, conclusions, recommendations and reporting.[3]

---

[1] The other principles are credibility and utility – see the Evaluation Policy
[2] WFP Evaluation Policy (2016-2021)
[3] WFP Evaluation Policy (2016-2021)

- Impartiality requires the absence of bias in all phases and steps of the evaluation process: planning, design, team selection, methodological rigour, data gathering, analysis, findings, conclusions and recommendations.
- Impartiality also implies that the views of all stakeholders are taken into account, with different views appropriately reflected in the evaluation analysis and reporting.

3. Provisions for Independence and Impartiality in Evaluations – an overview

5. The evaluation policy (2016-2021) specifies a number of provisions for independence and impartiality, which, when adhered to, increases the credibility of evaluations. These include mainly:[4]
   - Decision making on evaluation (including selection and design, team selection, budgeting, terms of reference, inception and evaluation report approvals), made by management as distinct from staff directly responsible for designing and implementing subjects being evaluated.
   - Potential conflicts of interest are assessed prior to hiring of evaluation teams and all hired evaluators sign the code of conduct for evaluators in the United Nations systems.
   - Decentralised evaluation quality assurance system (DEQAS) provides for transparent evaluation management.
   - All evaluations are publicly available and conducted by independent evaluators.
   - Mechanisms to ensure that evaluations are free from undue influence and reporting is unbiased and transparent (e.g. outsourced quality support review of TOR, inception and evaluation reports).

6. There are however challenges to independence and impartiality in evaluation that must be regularly overcome. For WFP and for the evaluation team respectively, these include:[5]

WFP (Commissioning Office and evaluation stakeholders)

- Deciding that certain issues or stakeholders are 'off limits', despite their relevance to the evaluation;
- Bias in selection of the team carrying out the evaluation, perceiving some evaluators to be more amenable to influence/having particular perspectives;
- Interest by some stakeholders in confirming positive findings rather than openly assessing what happened and why;
- Limiting the data available to the evaluators;
- Influence on the evaluation team to alter findings, against the evidence;
- Making findings public (a requirement of evaluation) in a 'skewed' way, allowing for a biased understanding / interpretation.

Evaluators

- Choice of methodologies which allow for only a limited or partial view;
- Reviewing only limited data, which leads to a limited/biased perspective;

---

[4] See full set of provisions on page 10, table 1 of the evaluation policy
[5] Adapted from Morra-Imas LG & RC Rist (2009) *The road to results: designing and conducting effective development evaluations pp496-497.* The International Bank for Reconstruction and Development/The World Bank, Washington DC

- Inclusion of unsubstantiated opinions due to carelessness or unprofessional evaluation practices of evaluators;
- 'Shaded' evaluation findings due to evaluator's prejudices or preconceived notions;
- Analytical methods which are not transparent/which risk introducing bias to the evaluation.

7. To counter these challenges and ensure that requirements for independence and impartiality are met from both WFP and evaluators' side, the following criteria must be met (see Table 1): How to do so is described in the next sections, both in general and for each Phase of the evaluation.

Table 1: Independence and Impartiality requirements relative to WFP and Consultant/s

WFP Commissioning Office	Evaluators
• Rigorous and transparent processes for evaluation team selection must be in place.	• The evaluation team must demand, and be given, full autonomy in conducting the evaluation and reporting their findings.
• The evaluation team must be given, full access to all relevant information required for the evaluation.	• Methodology, and choice of analytical methods, must be fully justified and transparently documented and applied.
• The independent evaluation team must be able to carry out its task without influence or pressure from WFP and stakeholders.	• Evaluations should be conducted to rigorous quality standards, including use of multiple data sources to support findings.
Evaluation reports must be made public.	

4. Roles and Responsibilities for Independence and Impartiality in Evaluations

8. WFP's Evaluation Policy (2016-2021) puts in place provisions and roles and accountabilities for safeguarding the independence and impartiality of all WFP evaluations. Different individuals and groups within WFP play a role in upholding independence and impartiality:[6]

- **OEV** is responsible for setting the normative framework including the provisions for impartiality and the **Regional Bureaus** for their application
- **Regional and HQ Directors** are responsible for ensuring the independence and impartiality of decentralized evaluations commissioned within their regions or divisions
- The **Country Director/Deputy Country Director** has overall responsibility for ensuring impartiality of decentralized evaluations commissioned by their Country Office;
- The **programme team** in the Country Office who designs and implements the intervention under evaluation require clarity on a) what independence and impartiality mechanisms will be put in place for the evaluation process and b) their role in implementing these;
- The **WFP Monitoring and Evaluation team** in the Country Office, as custodian of performance data and information (including monitoring reports, databases, list of project sites etc.), ensure that these data are accessible to the evaluation team.

---

[6] See section VII, page 16-19 of the WFP evaluation policy for details on roles and accountabilities

9. The WFP Commissioning Office of a decentralized evaluation is required to establish:
   - **Internal Evaluation Committee** (EC), to manage and make decisions on the evaluation. Chaired by the Country Director or his/her Deputy Country Director, reviews and approves the Terms of Reference, budget, evaluation team, and inception and evaluation reports, helps maintain distance from influence by programme implementers, while also supporting management of the evaluation (see TN on Evaluation Committee).
   - **Evaluation Reference Group** (ERG) (including external stakeholders) is set up to steer the evaluation process and further support the relevance, utility and independence of the evaluation. The ERG reviews and provides feedback on TOR, inception report and evaluation report. Its members act as experts in an advisory capacity, without management responsibilities (see TN on Evaluation Reference Group).

10. For small Country Offices, the options for ensuring impartiality will be more limited, since most if not all staff are likely to have had some involvement in the subject of the evaluation - whether its design, management or monitoring and evaluation. Allocation of roles and responsibilities must take account of these levels of exposure.

11. If a staff member has had extensive involvement in the subject of the evaluation, including: i) Playing a major role in the design team; or ii) Playing a major role in implementation, then that particular staff member should ideally not assume the role of Evaluation Manager, or be involved in sign-off of the evaluation report.

12. When identifying an **Evaluation Manager**, the first option should be the Monitoring and Evaluation (M&E) officer (M&E). If this is not feasible due to lack of such a position, or limited capacity of the person encumbering the position, or direct of involvement in the design, a country office has three other options to consider in order of priority:
   i. Option 2: Identify another officer within the CO (VAM, Compliance or programme officer) who ideally, has not been directly involved in the implementation and who has the requisite capacity.
   ii. Option 3: Identify and request for support from a staff in another country office who has managed a decentralised evaluation in the past; OR engage a consultant to act as the evaluation manager.
   iii. Option 4: In exception cases where none of the above options is feasible, the regional evaluation officer (REO) will perform the role of the evaluation manager.

13. Maintaining independence does not mean that those responsible for design and delivery of the intervention being evaluated are isolated from the evaluation process. They are key stakeholders and their participation is essential and must be meaningful. However, they should not have any control or influence in the design or conduct of the evaluation or any veto on its findings.

5. Key Considerations for Achieving Independence and Impartiality

14. In order to achieve impartiality and independence in a decentralized evaluation, various key considerations are necessary in all phases of the evaluation process. Table 2 provides an overview of considerations and provisions at different phases of an evaluation.

Table 2: Overview: Integration of impartiality and independence in each evaluation phase

Phase	Issues
	• There are a number of potential threats to independence and impartiality to be addressed during the planning phase. Chief amongst these is the issue of resourcing. Whilst resource restrictions are inevitable, it is important that the Commissioning Office is not so impeded by these that they become the primary determining factor in what is evaluated. • Where donors have made provision for evaluation of interventions they help to fund, it is important that this does not lead to undue influence. It remains the responsibility of the WFP Commissioning Office to ensure that there is no 'cherry-picking' or avoidance of potentially contentious issues in the scope agreed, or in the approach to be adopted. For additional information, a <u>Technical Note on Engaging with Donors on Evaluation</u> was developed to provide guidance to Donor Relations Officers at CO/RB/HQ levels as well as CO/RB staff interacting with donors on key issues related to evaluation and the different points. • The Commissioning Office will need to plan ahead and ensure that resources for evaluation are secured and are adequate. While the Coverage Norms for decentralized evaluation need be taken into account, selection of what is evaluated should be focused on where evaluation insights are most valuable and useful. Within the framework of the minimum coverage norms, the Commissioning Office Director has the final say in selection of subjects of evaluations.

	Tasks	Outputs
	• Identify and protect budget required for evaluation at the design stage of a Country Strategic Plan (CSP), Interim Country Strategic Plan (I-CSP) or intervention. Appoint Evaluation Manager as early as possible in order to maintain degrees of separation from subject of evaluation	• Sufficient budget for contracting independent evaluators • Evaluations selected based on priority need • Evaluation Manager appointed

	Issues

	• <u>Evaluation team</u> must be independent in order for the evaluation to be free from undue influence, the members of the evaluation team. This will help to ensure that they have no vested interest or potential conflicts of interest which might influence the evaluation process and findings.
	• <u>The Terms of Reference</u> (TOR) shape the independence and impartiality of an evaluation in terms of its scope, purpose, criteria and questions. The Evaluation Manager leads on their preparation, but, since the review process for evaluation products is a key to ensuring impartiality, the draft ToR is first shared with the outsourced quality support service for review and once revised based on the feedback received, the ToR is then shared with the ERG and wider stakeholders for comments. A record is established of consultation on the draft TOR, including comments and responses on how these have been addressed (see <u>Comments Matrix</u> for Decentralized Evaluation Terms of Reference). The Chair of the Evaluation Committee, approves the ToR.
	• To further support impartiality and independence during the Preparation phase, when allocating staff roles and responsibilities for particular evaluations:
	   ○ Try, as far as feasible, to avoid decision-making role from those who have been closely involved with the evaluation subject.
	   ○ The Evaluation Manager should ideally not have played a direct role in the design or implementation (recognising that this may not always be feasible for small Country offices – see paragraphs 11-12 above for options).
	• When identifying and contracting the evaluators, by procurement or other means, these requirements will help facilitate the impartial selection of an appropriate team. Potential candidates should also be willing to undergo 'full disclosure', meaning that they disclose

any relationships or activities that might be viewed by others as a conflict of interest. Checks are also undertaken to ensure that all of the evaluators are fully independent of the subject of the evaluation, prior to their being contracted.

- The extent to which consultants have already worked for WFP is a key issue: familiarity with the organisation can be valuable but the potential for bias increases where a consultant's work is solely focused on one agency. There should be no official, professional, personal or financial relationships that might cause, or lead to a perception, of bias in terms of what is evaluated, how the evaluation is designed and conducted, and findings presented. Consultants should agree not to work with the concerned Country Office for a period of six months after the end of the evaluation.
- The Evaluation Manager must ensure that the selected Evaluation Team understand and sign the code of conduct (see Code of Conduct for Evaluations in the UN System). If the team is hired through a firm, the signed copies of code of conduct should be submitted by the firm before issuance of the purchase order. If the team is hired through HR, this should be signed at the time the consultants are signing the contracts.

Tasks	Outputs
- Country Director/Deputy Country Director to be responsible for key decisions & ensuring no staff conflict of interest when allocating roles & responsibilities - Develop Terms of Reference (TORs) using template and following the DEQAS process guide - Establish internal Evaluation Committee , chaired by Country Director or Deputy Country Director to support evaluation management; - Establish wider Evaluation Reference Group (ERG) as an advisory body - Seek and incorporate feedback on TORs from Evaluation Committee/Evaluation Reference Group – with a clear trail of comments received and responses (using the comment matrix template) - Submit draft TOR to the outsourced quality support service (DE QS) managed by OEV - Evaluation manager gives a careful consideration of the feedback from the DE QS in finalizing the TOR - Follow procedures for recruitment of evaluation team, including disclosure and assessment of any potential conflict of interest - Ensure evaluation team members are independent from subject of evaluation prior to contracting - Have evaluators sign the Code of Conduct for Evaluators in the UN System[7]	- Clear and agreed roles and responsibilities related to the evaluation for management and staff - Evaluation Committee established - Evaluation Reference Group established - Unbiased TOR in terms of evaluation scope (inclusions or exclusions) and design - Contracted independent, impartially selected evaluation team with no conflicts of interest - TOR Comments matrix completed

Issues
During the Inception Phase, the Evaluation Manager and all relevant parties have the responsibility to provide access to all relevant information necessary for the conduct of evaluations[8] and to facilitate access to key stakeholders with due respect for their confidentiality and the "do no harm" principle.

---

[7] http://www.unevaluation.org/document/detail/100
[8] See also Directive on Information Disclosure CP2010/001

- In orienting the evaluation team, the Evaluation Manager emphasises the importance of impartiality in fieldwork and stakeholder meetings; and in the analysis and presentation of initial findings and proposals in the draft Inception Report (see Inception Report Template). The report template includes key elements to ensure impartiality, including a stakeholder mapping and draft schedule of the stakeholders to be consulted/met during the field work.
- Once the draft Inception Report has been prepared, and this has been quality checked by the Evaluation Manager (see Inception Report Quality Checklist), the report is shared with the outsourced quality support service (DE QS) for review. The report is then reviewed by the team based on the feedback received by the DE QS and the evaluation manager. The Evaluation Reference Group members, and any other identified external stakeholders, are also given the opportunity to review and provide feedback before the report is finalised. This ensures that all stakeholder views are considered. Given that the inception report provides the overall design of the evaluation, this reduces the perception of bias in the design of the evaluation. On critical aspect is openness and transparency in the approach to sampling, whether random or purposive selection, of field sites and stakeholders/beneficiary groups– and documenting this clearly in the inception report.
- Using the Comments Matrix, the evaluation team then responds to each comment to ensure transparency of response to stakeholders' comments. The Evaluation Manager ensures that there is an appropriate record of the comments received and how these were responded to.

Tasks	Outputs
- Facilitate evaluation team's access to key stakeholders and information - Seek review and incorporate feedback on inception report from the Evaluation Committee and, the Evaluation Reference Group – including Comments Matrix - Submit draft report to the outsourced quality support service managed by OEV - Evaluation team gives a careful consideration of the feedback from the DE QS in finalizing the inception report	- Independent design of the evaluation - Unbiased inception report - Comments matrix Inception Report

Issues

- The Evaluation Manager, with the oversight of the EC and the advice of the ERG, has the responsibility to anticipate different interests and to counteract attempts to avoid focus on particular issues or with particular sub-groups, or to influence the evaluation in any way. Anticipating and addressing potential bias in the planning and conduct of data collection field work demands that attention is paid to eliminating bias in the selection of interviewees and informants and the process of collecting information from them. Helpful measures include:
  - Applying the evaluation design set out in the Inception report to guard against bias (as well as increase reliability). Any deviation from the design should be transparently discussed and documented.
  - Ensuring that staff of WFP and of partner organisations do not participate in meetings with external stakeholders or beneficiaries.
- Informants and contributors to the evaluation must be reassured of confidentiality, respect and non-judgement by the Evaluation Team. During field work, to remain impartial requires restraint on the part of the Evaluation Team in relation to expressing their own views.

Tasks	Outputs

• Facilitate evaluation team's access to stakeholders, field sites, beneficiaries and secondary data sources • Ensure that WFP staff do not participate in evaluators' meetings, except where agreed by the evaluation team leader	• Evaluation conducted independently • Sufficient range of data sources interrogated and data collected • Views of all stakeholders taken into account

Issues

- Evaluation reports must give a balanced and full presentation of the findings, including identifying successes and failures (see Evaluation Report Template and Quality Checklist). The link between findings and recommendations should be clear and persuasive, not straying beyond the body of evidence generated by the evaluation (including from secondary sources) or the scope of the evaluation. The report should not be influenced by the personal views of the evaluation team. If different stakeholder groups have different views, this should be made clear in the evaluation report.
- Reviewing and commenting on the draft evaluation report by the ERG and the Regional Bureau, receiving and considering feedback from the outsourced quality support servicewill bring a level of scrutiny that should help detect and address possible and perceived bias. Maintaining an audit trail, via the Comments Matrix, will provide evidence for objective assessment of how stakeholder inputs have been addressed.
- Any factual errors in the evaluation report must be corrected. These revisions should always be handled by the evaluation team and not by WFP staff. In terms of findings and conclusions, there should be no pressure to 'soften' these. The Evaluation Team must consider comments received, but has discretion to accept or reject, management comments and any requests for changes. Where there is pressure to alter conclusions or recommendations, while still consistent with findings, such requests should be judged on their merits. Should any differences arise, which cannot be resolved through discussions between the evaluation manager and team leader, the ERG should be required to intervene, and contact the OEV DE Helpdesk as appropriate.
- The structure and content of the Evaluation Report follows the provisions set out in DEQAS process guide and in this Technical Note, which will help to minimise bias and partiality. This will mean that the report will:
  o Use the relevant DEQAS evaluation report template, adapted as appropriate
  o Not contain any expressions that could be deemed intolerant or prejudiced.
  o Provide adequate referencing of sources and account of methodologies.
  o Be clear on challenges/limitations to impartiality and how they were resolved

Tasks	**Outputs**
• Transparent analysis • Seek review and incorporate feedback on draft evaluation report from Evaluation Committee and Evaluation Reference Group • Seek and incorporate feedback on evaluation report from external stakeholders • Submit draft report to the outsourced quality support service managed by OEV • Evaluation team gives a careful consideration of the feedback from the outsourced quality support advice. • All stakeholders respect evaluators' findings and recommendations, provided that they are evidence-based and clearly formulated • Sign-off on Evaluation Report by Country Director or by the Regional Director/HQ division director	• Unbiased evaluation report that incorporates views of all stakeholders • Independent findings, conclusions and recommendations • Evaluation Report signed-off by Country Office Management • Comments matrix Evaluation Report

Phase 6: Disseminate and follow-up	Issues	
	• Evaluation findings have to be presented in the evaluation report in a way which respects their integrity, without being 'distorted' or selectively interpreted and with appropriate measures to respect stakeholders' confidentiality and the "do no harm" principle. For this matter, evaluation reports have to be made publicly available in full, including all associated annexes. • Presentation and discussion of evaluation report findings should take place in appropriate fora – internal and external.	
	Tasks	Outputs
	• Disseminate openly and transparently evaluation product/s that will stand up to third party scrutiny	• Report publicized and widely available

12. Further Reading on Independence and Impartiality

15. Other relevant information on independence and impartiality, including DEQAs elements, can be found in the sources below:

   o UNEG (2008) Code of Conduct for Evaluations in the UN System
   o UNEG (2007) Ethical guidelines for evaluation
   o UNEG (2005) Norms for Evaluation in the UN System
   o UNEG (2005) Standards for Evaluation in the UN System
   o OECD DAC (2010) Quality Standards for Development Evaluation

For more information on Decentralised Evaluations visit our webpage

http://newgo.wfp.org/how-do-i/do-an-evaluation

Or contact the DE team at: wfp.decentralizedevaluation@wfp.or