EVALUATION OF PUBLIC POLICIES IN SOUTH AFRICA: GOVERNANCE, INDEPENDENCE AND CREDIBILITY

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INTRODUCTION

Monitoring and evaluation practice in the Government of South Africa is at an interesting point in its evolution. Ten years ago M&E was a term known only to a handful of officials who had been exposed to the practice through donor agencies and other countries. There were trailblazers, such as the Department of Land Affairs, which established the M&E directorate for land reform as early as 1995. Today the Government boasts an M&E architecture that is beginning to approximate those of more developed countries. Many departments have a dedicated M&E unit headed by an official from the senior management service, and the government-wide monitoring & evaluation (GWM&E) framework is gradually being institutionalized. South Africa also has a Public Service Commission with a constitutional mandate to monitor and evaluate public administration. The establishment of the Ministry for Performance, Monitoring and Evaluation in the Presidency following the 2009 general elections has catapulted M&E to greater prominence.

What are the implications for evaluation of public policies in South Africa? This brief paper explores this question from the perspective of governance, independence and credibility of evaluation practice.

WHY INDEPENDENCE AND CREDIBILITY MATTER

Evaluation of public policies is an important tool for promoting accountability of elected officials and public servants, improving or changing policies, and promoting learning within public sector organizations. If the recommendations of evaluations are to be used, the evaluation must be credible. Credibility is influenced by the competence of the evaluation team members and their personal credibility, the quality of the evaluation and the extent to which it meets the requirements of independence. Evaluation independence, quality and

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credibility can be considered complementary facets of evaluation excellence.[33]

Independence lies at the core of credibility. The commonly used definition of independence, from the Development Assistance Committee of the Organisation for Economic Co-operation and Development, considers an evaluation to be independent when "carried out by entities and persons free of control of those responsible for the design and implementation of the development intervention."[34] This definition also suggests that evaluation is independent when evaluators (i) can carry out their task without political influence or pressure from within the organization, (ii) are given full access to all relevant information required for the evaluation and (iii) have full autonomy in conducting and reporting their findings.

The principle of independence refers not only to behavioural dimensions. Structural arrangements, such as the location of an evaluation unit in a particular organization and the rules that govern the organization, also influence the independence of evaluations. Independence and credibility are part of the approved norms and standards of the United Nations Evaluation Group and other international agencies such as IFAD and the Asian Development Bank.[35]

THE MONITORING AND EVALUATION SYSTEM IN SOUTH AFRICA: HOW IT WORKS

The M&E system in South Africa is not a single system but a collection of systems that have evolved over time. Its major components are discussed below in the order of their evolution.

Public Service Commission

The Public Service Commission (PSC) is established in chapter 10 of the Constitution, which deals with public administration. It is constitutionally mandated to investigate, monitor and evaluate the organization, administration and personnel practices of the Public Service. It is also empowered to advise national and provincial organs of the state and promote a high standard of professional ethics in the Public Service. As a body established under the Constitution and reporting to Parliament, the PSC is independent. Yet it cannot afford to be distant as it has to engage with government departments in its advisory role.

Since its establishment as the 'new' PSC in 1999, it has conducted many evaluations on a broad spectrum of issues. These range from evaluation of service delivery of a particular sector to evaluation of policy initiatives such as poverty reduction programmes. One of its signature activities is the annual State of the Public Service Report (SOPS). Covering a different theme each year, the report is organized around nine constitutional values and

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33. Picciotto, Roberto, 'Evaluation Independence at DFID: An independent assessment prepared for IADCI', 29 August 2009.

34. OECD, DAC Working Party on Aid Evaluation, 'Glossary of Key Terms in Evaluation and Results Based Management', 2002.

35. United Nations Development Group, 'Norms and Standards for Evaluation in the UN System', April 2005.

principles of good public administration.[36] The release of the SOPS Report to Parliament is usually followed by a round-table discussion with stakeholders who debate the issues arising from it and propose improvements to its format and processes.

An equally important output of the PSC is the consolidated public service monitoring and evaluation report, which evaluates the performance of individual departments against the nine values and principles. Departments are evaluated against explicit performance indicators. The PSC believes that these evaluations contribute to good governance and improved service delivery.[37] The PSC has published a document, 'Basic Concepts in Monitoring and Evaluation', to support M&E practitioners, senior managers in the Public Service and managers of service delivery units who produce performance information and statistics.

In 2009 the PSC commissioned an independent assessment of its work, which yielded valuable insights that can help to improve performance. The main findings indicate that the PSC is seen as producing sound, high-quality research and evaluation that are of use to policymakers, decision-makers and other oversight bodies such as the legislatures. The PSC is seen to behave independently, firmly and fairly. The findings also highlight limitations, such as its lack of power to compel the changes it recommends, its limited resources and the fact that it has not used its reports more strategically to influence change.[38]

Government-wide monitoring and evaluation system

In the first five years of democracy in South Africa, very few departments engaged in any systematic monitoring and evaluation of their policies and programmes. In the late 1990s there were unsuccessful attempts to introduce government-wide monitoring and evaluation, which led to a renewed effort in 2004.

The 2004 election manifesto of the ruling party identified monitoring and evaluation as a priority: "We will improve the system of monitoring and evaluation to improve the implementation of all these programmes, through stronger monitoring and evaluation units at national, provincial and local levels.....".[39] In 2005 the Cabinet approved a plan to develop the GWM&E system across government. The Presidency was assigned leadership of the effort, with participation by the National Treasury, Department of Public Service and Administration, Department of Provincial and Local Government, South African Management Development Institute, Public Service Commission and Statistics South Africa.

The GWM&E framework integrates M&E principles, practices and standards for use in all spheres of government. It serves as a top-level information system and draws on component systems.[40] It comprises three components or frameworks:

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36. The latest SOPS report focused on the readiness of the public service for the Soccer World Cup 2010.

37. Public Service Commission, Republic of South Africa, 'Third Consolidated Public Service Monitoring and Evaluation Report, Research Cycle 2005/2006', March 2007.

38. Public Service Commission, Republic of South Africa, 'An Assessment of the Impact of the Work of the Public Service Commission on Public Policy and Practice in South Africa', May 2009.

39. Election Manifesto of the African National Congress, 2004.

40. The Presidency, Republic of South Africa, 'Policy Framework for the Government-wide Monitoring and Evaluation System', 2007.

- A programme performance information framework that clarifies standards for performance information;

- Social, economic and demographic statistics collected by Statistics South Africa through the census and surveys, as well as statistics collected by other government institutions;

- An evaluations framework to guide the planning and conduct of evaluations.

The policy framework for the GWM&E system, approved in 2007, provides much-needed clarity about its scope and purpose. Initially there was confusion, when the GWM&E system was thought to be an information technology system. Roles and responsibilities also needed clarification as inevitable issues emerged regarding boundaries and overlapping roles.

The policy framework of the GWM&E system outlines seven principles, including aspects of credibility (sound methodology, ethical conduct of evaluations and utilization focus). The principle of independence does not appear on the list, although it had been identified as a guiding principle of evaluation in an earlier draft document on principles and standards for M&E.[41]

Since its inception, the GWM&E system has spearheaded the national development indicators project. The Government has released an annual publication on 76 development indicators linked to government priorities and in some instances to the Millennium Development Goals. Government departments use the programme performance information framework to some extent. This is likely to change over the next year when the Auditor-General expresses an audit opinion on performance information. The evaluation framework is yet to be finalized.

Monitoring and evaluation by government departments

The critical elements of an effective M&E system include:

- Tools, methods, data and information systems;

- An annual or rolling plan of evaluations to be conducted;

- Rules governing how M&E is to be conducted and managed; how and when stakeholders are to be consulted; and how to deal with independence and conflict of interests;

- Standards for reporting evaluations and monitoring;

- Resources in terms of staff qualification and skills requirements and budgets;

- Roles, responsibilities and accountability for M&E.

Other than mandatory legislative and policy reporting requirements such as annual reporting, the Government does not prescribe these elements, so there is a great deal of variation in M&E systems, as confirmed by the evaluation study conducted by the PSC in

41. The Presidency, Republic of South Africa, 'Draft National Guiding Principles and Standards for Monitoring and Evaluation of Public Policies and Programmes in South Africa', June 2006.

2007.[42] The study also found that only a few provincial departments had M&E units with adequate staff and budgets.

Due to capacity constraints, a number of departments engage external consultants to conduct evaluations, particularly for large evaluations. Departments also use external consultants when they need an independent evaluation of policy. The trend is for departments to build internal M&E units to focus on monitoring the department's implementation of policies and programmes and to contract external or independent consultants to conduct evaluations.

The national government aims to provide an enabling environment for M&E in departments, rather than prescribe the details of the M&E system. However, departments have basic ground rules, which presumably will be in the evaluation framework being developed by the Presidency. Given the capacity constraints in a number of departments, they are likely operating without a well-defined departmental framework, especially with regard to governance (rules) for evaluation. As a result, the independence and credibility of evaluations conducted or managed by departments could be compromised. It would be instructive for the national government to assess the readiness of departmental M&E systems to respond to the new approach proposed by the Ministry for Performance, Monitoring and Evaluation.

MINISTRY FOR PERFORMANCE, MONITORING AND EVALUATION

The Ministry for Performance, Monitoring and Evaluation was established in the Presidency in 2009 following the general elections and is intended to complement the newly established National Planning Commission. While the latter is charged with developing the country's strategic vision, the Ministry is responsible for driving the improvement in government performance through a focus on outcomes. In September 2009 the Ministry issued a 'green paper' titled 'Improving Government Performance: Our Approach'. It named three focus areas for the Ministry:

- Management of outcomes through ministerial accountability for improving delivery performance, meaning that ministers are to be held accountable through performance agreements that commit them to achieving selected outcomes;

- Institutionalizing the GWM&E system through a renewed focus on improving measures of inputs, outputs and outcomes;

- Unblocking service delivery through the establishment of a delivery unit to deal with blockages and non-delivery.[43]

The Ministry intends to effect a change in the approach to M&E. The green paper envisages an outcomes performance management system. It will start with a few politically determined

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42. Public Service Commission, Republic of South Africa, 'Report on the Audit of Reporting Requirements and Departmental Monitoring and Evaluation Systems within National and Provincial Government', June 2007.

43. The Presidency, Republic of South Africa, 'Improving Government Performance: Our Approach', September 2009.

outcomes, working backwards to identify a few output measures that could indicate whether outcomes were being achieved. The emphasis will be on outcomes throughout government, and ministers will be required to report on them through specific output indicators. To promote transparency and accountability, the Government has committed to making the results of assessments available to the public.[44] The focus on outcomes is expected to assist Parliament in its monitoring and oversight role.

The outcomes performance management system is intended to complement the GWM&E system. The policy anticipates that, despite the emphasis on monitoring, there will be a need for evaluation of outcomes and impact. It also recognizes the need for other forms of evaluations such as process evaluations.

GOVERNANCE CHALLENGES TO INDEPENDENCE AND CREDIBILITY

The establishment of the Ministry for Performance, Monitoring and Evaluation represents a shift in South Africa's M&E system. While it is too early to judge the extent of the shift, the notion of the president holding ministers accountable has appeal to citizens dispirited by poor service delivery. The elevation of M&E to cabinet ministerial status undoubtedly sends a clear message about the importance of M&E to the government. But this elevated status presents some challenges:

- **The balance between monitoring and evaluation favours monitoring:** The GWM&E system is explicit about focusing initially on monitoring, with emphasis on developing indicators and improving the quality of the information used. The rationale is that institutional capacity has to be built first so that sound monitoring systems and processes can serve as a foundation for effective evaluations. This prioritization of monitoring over evaluation is carried through into the new outcomes performance management system.

  There are risks to maintaining this imbalance between monitoring performance and evaluating implementation and effectiveness of public policies. The outcomes of the performance management system assume that the output indicators selected are those critical to achievement of a particular outcome. Experience shows that the link between outputs and outcomes is seldom clear cut and that evaluation studies are needed to test the causal links. If evaluation continues to be downplayed, there is a risk that the Government continues to monitor less useful indicators and draws incorrect conclusions about the achievement of outcomes.

  Government officials are likely to spend significant amounts of time collating information for the minister's scorecard. Given the capacity constraints in departmental M&E units, especially in the provinces, this could divert resources and attention from evaluations, short-circuiting the feedback loop between evaluation and monitoring.

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44. Honourable Collins Chabane, Minister for Performance, Monitoring and Evaluation, Republic of South Africa, 'Address on the Budget Vote for the Presidency for the 2009/2010 Financial Year', 24 June 2009.

The Ministry for Performance, Monitoring and Evaluation has attempted to limit the number of indicators to be tracked, and it appears that 30 to 40 indicators will be monitored. Experience in other countries shows that limiting the number of indicators is not easy. If the number increases, it could perpetuate the emphasis of monitoring performance rather than evaluation of public policy.

There is no doubt that requiring ministers to report to the president on their performance every six months against predetermined indicators will fix their attention on those indicators. A keen focus on key outcomes and indicators is good, provided it doesn't lead to neglect of other important issues that fall outside the performance agreement.

The emphasis on monitoring in the outcomes performance management system and the GWM&E system also presents an opportunity. Ministers and senior government officials might see merit in requesting an evaluation of a particular aspect of policy or its implementation, in order to understand and explain why a particular output target has not been met. However, it would be preferable to have an appropriate balance between monitoring and evaluation. The regular monitoring of outputs and outcomes cannot be a substitute for comprehensive evaluation of public policies.

The challenge posed by the potential imbalance could be overcome if the PSC were to focus its evaluations on the outcomes identified by the Presidency. This can be done without compromising the PSC's independence in determining what it will evaluate and how it will conduct the evaluation; it does not require the PSC to ignore other areas for evaluation, but rather to focus on one or two outcomes as major evaluations in a given year.

● **Independence of evaluations is not on the agenda:** With the exception of the PSC, independence of evaluations is not on the agenda. This is perhaps a reflection of the emphasis on monitoring. As stated earlier, independence is not reflected as a principle of M&E in the government's policy framework.

The location of the M&E unit is ultimately the decision of the department head, as central government issues no prescriptions. M&E units in departments do not enjoy the same independence as internal audit units that report directly to the department head and are overseen by audit committees of external individuals. There is, however, an endeavour to ensure that M&E units are not in the reporting lines of those responsible for the design and implementation of policies and programmes.

The outcomes performance management system will largely rely on information supplied by government departments, and M&E units in these departments are likely to play an important role in providing that information. As these M&E units exist largely on the basis of preference by the minister or head of department, their independence is not assured. Information will flow from the M&E unit to the minister without the protection or mediation of an independent entity equivalent to an audit

committee. There is a risk that officials might downplay negative information and exaggerate positive results.[45]

The green paper stipulates that independent processes and moderators or experts will be used where feasible to enhance the integrity of the process. How this will work in practice has not been made explicit in the document.

A number of departments commission external consultants to conduct evaluations. These evaluations are not necessarily independent; rather, they serve to extend the limited capacity within departments. In some instances, departments use reference groups to provide technical guidance to evaluations or steering committees to provide strategic direction. When members of these committees are external to the department, they can provide a check against undue influence by the commissioning department.

- **Capacity constraints in M&E units threaten the credibility of evaluations:** Although many departments are attempting to establish fully functioning M&E units with skilled staff, a number still have capacity constraints. As a discipline, M&E is relatively new to the South African Public Service, though the government's management development institute and universities have introduced short courses in it. The PSC provides guidance through its 'Basic Concepts in Monitoring and Evaluation' document. There is also an M&E forum or learning network within the Government. Organizations such as the South African Monitoring and Evaluation Association and local evaluation networks also contribute to building a community of practice.

   But the capacity gap, particularly in provincial departments, is still large enough to hamper the credibility of evaluations. There is limited understanding of how to establish an M&E unit in terms of its structure, necessary staff knowledge and skills, required policies and procedures, and how to plan a programme of evaluations. Departments are increasingly commissioning external consultants to conduct evaluations, but this does not necessarily guarantee credibility. Terms of reference for commissioned evaluations are seldom clear, and the key evaluation questions are not well articulated. M&E practitioners do not always have the experience or expertise to manage commissioned evaluations. This results in evaluations that have limited value and waste government resources. The GWM&E evaluation framework is supposed to provide guidance on these issues, but it has not yet been completed.

- **Proposed legislation for M&E may not improve it:** The government's green paper states that it may consider introducing legislation, though it does not clarify the likely aim of such legislation. There are already acts, regulations and policies requiring government departments to account for their use of resources and performance.

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45. This type of behaviour also occurs in countries with well-developed M&E systems. Refer to Schiavo-Campo, Salvatore, 'Building Country Capacity for Monitoring and Evaluation in the Public Sector: Selected Lessons of International Experience', Economic Capacity Development Working Paper Series No. 13, June 2006.

Legislation to enforce monitoring and evaluation practices will not necessarily improve M&E. An agreed evaluation framework with explicit norms, standards and guidance could be more effective. Legislation could have the unintended effect of getting people to focus on minimal compliance.

GOOD PRACTICE IN ADDRESSING CHALLENGES

The fact that M&E is a relatively new discipline in the South African public sector provides opportunities for innovation and good practices based on lessons learned by others. The independence and credibility of evaluations of public policies can be enhanced in a number of ways:

- **Use of peer review panels:** Whether departments conduct their own evaluations or use external consultants, they can greatly enhance the quality and hence the credibility of evaluations by using peer review panels. Peer review is a standard practice in research and could apply equally to evaluation. The selection of panel members is important to ensure credibility, and selection should therefore be based on technical and professional expertise. Any potential conflict of interest needs to be cleared up at the beginning. The terms of reference of the panel also need to be made explicit from the outset. The Ministry for Performance, Monitoring and Evaluation should consider introducing peer review or expert panels as a matter of course.

- **Use of advisory committees:** Advisory committees can enhance the credibility and independence of evaluations if they have clear terms of reference and members who will add value to the evaluation. Involving an advisory committee throughout the evaluation can help to address concerns during the evaluation rather than at the end of the process. Government departments use advisory committees comprising external stakeholders when it is important to involve particular constituencies. Of course, using advisory committees has risks. They sometimes assume that they have decision-making powers. They often represent a particular constituency, leading them to take a political position on matters. Evaluations can be delayed when advisory committee meetings are cancelled. If government officials do not provide leadership, the advisory committee may feel empowered to act outside its mandate. External consultants conducting the evaluation can find themselves caught between the advisory committee and the client department.

- **Evaluations of the evaluators:** It is essential for entities conducting evaluations to periodically face independent scrutiny. Independent assessment of evaluation bodies can enhance the credibility of these bodies. This is no different than subjecting auditing firms to audit of their practices. Independent assessment also serves to improve the quality of evaluations. The independent assessment commissioned by the PSC on its impact on public policy is a step in the right direction, though it could have been enhanced by the use of a peer review panel.

The PSC could evaluate the independence of M&E units in government departments. For such an evaluation to be thorough and meaningful, it would have to be done against explicit indicators and criteria, such as those described in the OECD/DAC Glossary of Key Terms in Evaluation and Results-Based Management. The study on evaluation independence at the UK Department for International Development provides a useful template for such an evaluation.[46]

The credibility of M&E units and the quality of their work can also be enhanced through a regular 'health check'. It can identify capacity gaps and pinpoint areas for training and development, as well as areas where the PSC, the Presidency, National Treasury and other central government departments need to provide further guidance.

- **Use of joint evaluations:** The Government of South Africa and the United Nations jointly commissioned an evaluation of the role and contribution of the United Nations system in South Africa in 2008.[47] It was essential for the evaluation to be independent of the United Nations on the one hand and credible to the South African Government on the other. The terms of reference were agreed to by both parties and the evaluation was managed jointly. An independent team conducted the evaluation, and its work was peer reviewed by an external panel. This model could be adapted for evaluation of government policies and programmes, particularly large programmes or controversial policies. For example, an evaluation could be managed jointly by government and an industry group on a particular issue such as health care.

REMAINING CHALLENGES

- **Creating demand for and understanding of M&E by legislatures:** Both national and provincial legislatures in South Africa are required by the Constitution to exercise oversight over the Executive. M&E reports can assist them in exercising that oversight. Parliamentarians are sometimes not aware of these M&E reports until a department or a diligent parliamentary researcher brings them up. Many new representatives have entered national and provincial legislatures since the 2009 elections, and they will need to be made aware of the potential value of M&E reports. The green paper envisages that parliamentarians will monitor progress made on priority government outcomes. For them to play their oversight role effectively, they will need to be educated about the workings of the outcomes performance management system, how the indicators were developed and collected, and the meaning of the indicators.

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46. Picciotto, Roberto, op cit.

47. United Nations and the Republic of South Africa, 'Joint Evaluation of the Role and Contribution of the United Nations System in the Republic of South Africa', 2009.

● **Developing M&E capacity in government:** The challenge of developing M&E capacity in the Government could persist for some time unless more creative solutions are introduced. The Government's primary management and leadership institute (Public Administration Leadership and Management Academy) provides basic training in M&E, and courses are also available at some universities. The number of technically proficient M&E practitioners is still not sufficient to meet the increasing demand. This is a particular issue in provincial departments, where there is competition for the small pool of professionals willing to work in the provinces. A possible solution to the shortage is development of a shared M&E service in those provinces. It would share scarce resources more effectively across a number of departments while allowing M&E practitioners to develop deeper understanding of more than one department. This in turn could foster the integration of action that often eludes government departments that operate in 'silos'.

CONCLUSION

M&E in South Africa is at an interesting point in its evolution. The heightened awareness by those not directly involved in M&E bodes well for the practice in South Africa. There is space for introducing innovative solutions to challenges. However, the lack of attention to independence of evaluations and the emphasis on monitoring could result in weakening evaluation practice.

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