Policy for Evaluation in UNHCR

Using evidence to drive results towards safeguarding the rights and well-being of people we serve

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Foreword

I am happy to share the revised Evaluation Policy for UNHCR, which sets out the vision and framework for evaluation in UNHCR from 2022 onwards.

The revised Evaluation Policy reflects UNHCR's desire to harness evaluation's full potential. Our vision is that evaluation informs choices made at all levels of the organization in strategic planning, programming, and agile decision-making based on timely, credible, and impartial evidence.

Evaluation cannot be considered in isolation from the humanitarian context in which UNHCR operates. As humanitarian challenges are becoming more complex, dynamic and severe, the role of independent timely evaluation becomes increasingly important.

Every day at UNHCR management has to make difficult choices, balancing immediate and long-term protection needs, solutions and assistance for the persons we serve. Often these decisions are made in highly volatile and frequently resource-constrained situations, punctuated by recurrent or overlapping emergencies. Having rigorous evidence of what is or is not working, and why, is critical to ensuring that the best choices are made.

This policy builds upon UNHCR's evaluation policy of 2016 and reflects recommendations from a 2021 independent Peer Review of UNHCR's evaluation function. It reflects organization-wide reforms including regionalization and decentralization, the introduction of new strategic directions, the launch of a new results-based management system, and other major changes over the past years.

Implementation of the policy will require a whole-of-organization approach. To succeed, it will be imperative to make evaluation an integral part of the organization's results-based management culture at all levels. Rigorous and credible evaluation should be seen as an indispensable tool for UNHCR – amongst other things, to demonstrate results and value for money to its member States, partners, and stakeholders, including the people we serve.

The new Policy outlines a clear operational model for evaluation, clarifies the role of the people we serve in the evaluation process, establishes coverage norms, clarifies the role, accountabilities and authorities of the senior management and UNHCRs workforce, and outlines potential sources of funding for different types of evaluation, among other things.

The new Evaluation Policy was designed in a consultative and reiterative process with key stakeholders inside and outside of UNHCR. I would like to thank everyone for their contributions. As we move on to the implementation, we count on your support to make the ambitious vision we set ourselves a reality.

> With regards, *Lori Bell* Head of the Evaluation Office



Lori Bell, Head of the Evaluation Office

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INTRODUCTION

This policy sets out the overall vision and framework for evaluation in UNHCR from 2022 onwards. It reaffirms the organization's commitment to evaluation, and its role in strengthening evidencebased learning and accountability to those whom it serves.

This evidence will reflect, directly and indirectly, the views and perspectives of people UNHCR serves and host communities regarding the protection and assistance provided by the organization.

Evaluation will increasingly become an integral part of the organization's results-based management culture and practice at all levels. Transparent and credible evaluations will be recognized and routinely used by UNHCR to demonstrate results and value for money to its member States, partners and stakeholders.

This policy supersedes the UNHCR Evaluation Policy that was approved in 2016.

UNHCR's vision is that evaluation informs choices made at all levels of the organization in strategic planning, programming and decision-making based on timely, credible and impartial evidence.



SCOPE

This policy applies to UNHCR Headquarters, regional bureaux and country operations. It also applies to all facets of UNHCR's work under the <u>Strategic Directions 2022-2026</u> and global Results Framework, cross-cutting issues and categories of people UNHCR serves.

Compliance with the policy is mandatory.

CONTEXT AND RATIONALE

In the context of UN system reforms and the <u>Global Compact on</u> <u>Refugees</u> (GCR), UNHCR has undergone a series of organizational reforms to shift capacities, authorities and resources closer to the point of delivery, to enable greater flexibility in how these are used, and to leverage relationships with others. These include the decentralization and regionalization of decision making; the introduction of multi-year planning; the launch of a new results-based management system; and reforms in human resource management and enterprise resource management, among others.

An independent UN/OECD-DAC <u>peer review of UNHCR's evaluation</u> <u>function</u>, commissioned by UNHCR and carried out in 2021, found that evaluation has been strengthened in terms of its performance and relevance to UNHCR since the previous review of 2013 and the evaluation policy of 2016. The peer review fully endorsed the establishment of an effective decentralized evaluation function – aligning evaluation with UNHCR's ongoing regionalization. It recommended the establishment of norms for evaluation coverage, quality and budget; improved harmonization with other oversight and results monitoring functions; and strengthened governance, particularly with regard to evaluations commissioned and managed by divisions, bureaux and country operations.

The revised policy reflects **UNHCR's agreement** with many of these views and recommendations. It provides for the building of a stronger, evidence-informed, quality evaluation system in the organization based on the principles of impartiality, credibility and utility.

Strategic Directions 2022-2026 reflects these reforms and strategic shifts. The implications of the new Strategic Directions and associated Results Framework and the GCR are far-reaching, including for evaluation.

DEFINITION AND PURPOSE OF EVALUATION

Definition

UNHCR applies the following UN definition of evaluation:

An evaluation is an assessment, conducted as systematically and impartially as possible, of an activity, project, programme, strategy, policy, topic, theme, sector, operational area or institutional performance. It analyses the level of achievement of both expected and unexpected results by examining the results chain, processes, contextual factors and causality using appropriate criteria such as relevance, effectiveness, efficiency, impact and sustainability.¹ An evaluation should provide credible, useful evidence-based information that enables the timely incorporation of its findings, recommendations and lessons into the decision-making processes of organizations and stakeholders.²

Purpose of evaluation

Evaluation is a tool³ that can objectively and credibly demonstrate the results of UNHCR's work, to advocate for people it serves, to drive innovation and improve the effectiveness and efficiency of its interventions – ultimately supporting the organization to achieve a greater and more lasting impact for refugees, internally displaced people, stateless persons and host communities.

UNHCR's Strategic Directions 2022-2026 provide the organization with a vision and strategic orientation, which is operationalized through multi-year country, regional and global divisional strategies and budgets that spell out intended impacts

¹ When evaluating Humanitarian Action, the conventional evaluation criteria developed by the Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) have been adjusted to include criteria such as appropriateness, coverage, connectedness (replacing "sustainability") and coherence. (ALNAP (2006) <u>Evaluating humanitarian</u> action using the OECD-DAC criteria. London: ALNAP)

² United Nations Evaluation Group (2016) <u>Norms and Standards for</u> <u>Evaluation</u>. New York: UNEG.

³ There are several tools for oversight, assurance, accountability and learning, of which evaluation is one. The role of evaluation is outlined in this policy, and reference is made to other relevant tools of inquiry as appropriate. UNHCR's Policy on Independent Oversight can be referred to for more details.

and outcomes clearly. Evaluation provides a means to credibly demonstrate whether these intended impacts are being realized, and through which mechanisms. It is also a tool to demonstrate where the organization is not reaching its potential and why.

UNHCR makes difficult choices to achieve the best immediate and long-term protection, solutions and assistance for the greatest number of people it serves. Often these decisions are made in highly volatile and frequently resource-constrained situations, with protracted situations punctuated by recurrent or overlapping emergencies. Having rigorous evidence of what is or is not working, and why, is critical to ensure that the right choices are made. UNHCR needs to know the ways in which specific interventions affect the lives of people it serves and host communities and how it can better contribute to the achievement of goals related to protection, assistance and solutions.

Evaluation provides UNHCR with a structured approach to: (a) obtain an impartial reflection on, and analysis of, its performance and results (for accountability purposes); and (b) recommend ways to improve and build on its strengths, address its weaknesses and contribute to bringing good practices and lessons to the fore (for learning and knowledge generation purposes). The overall purpose of evaluation is thus to contribute to both learning and accountability and to inform policy decisions, advocacy and strategic and programmatic choices.

<u>Annex 2</u> to this policy outlines the Theory of Change for evaluation in UNHCR. Annex 3 specifies the relationship between evaluation and related learning and accountability functions in the organization: namely oversight, results-based management and knowledge management.



EVALUATION PRINCIPLES AND GUIDING CRITERIA

In line with established practice for evaluation in the UN system norms and standards, the Code of Conduct for evaluation in the UN system and the UN Ethical Guidelines for evaluations, evaluation in UNHCR is founded on the fundamental principles of impartiality, credibility and utility. These principles, which are connected and mutually reinforcing, subsume a number of specific norms that guide UNHCR's work in commissioning, conducting and supporting the use of evaluation.⁴

UNHCR draws on the criteria of the OECD DAC⁵ and ALNAP,⁶ adapting these for evaluating humanitarian action. UNHCR does not select or apply the criteria mechanistically but adaptively to ensure that the evaluation reflects good practice standards and the needs of evaluation users.

Beyond the evaluation criteria and gender, diversity and human rights considerations, there are a range of additional normative standards that have been identified and agreed upon for <u>humanitarian action</u> that UNHCR applies.⁷ Evaluations must be conducted in full respect of UNHCR's <u>age, gender and diversity</u> <u>policy</u> and UNHCR's commitment to accountability to affected

- 5 See: OECD/DAC Network on Development Evaluation (2019) Better Criteria for Better Evaluation. <u>https://www.oecd.org/dac/evaluation/revised-evaluationcriteria-dec-2019.pdf</u>
- 6 See: ALNAP (2006) <u>Evaluating humanitarian action using the OECD-DAC</u> <u>criteria</u>. An ALNAP guide for humanitarian agencies. London: ALNAP
- 7 Additional standards broadly fall into two groups: those that include international humanitarian law, the humanitarian principles [see: http://www. uneval.org/document/detail/1862] and various conventions (including the 1951 Refugee Convention and the 1961 Statelessness Convention); and standards and guides that can be used both as standards to evaluate against and as a way to break down humanitarian actions into components that are easier to examine. They include system-wide, sector-specific standards and agency guides and manuals.

Gender, equity and human rights considerations are central to UNHCR's evaluations in accordance with UN-wide norms, standards and guidance.

⁴ Fourteen norms are established in the <u>UNEG Norms and Standards for</u> <u>Evaluation (2016)</u>, addressing: internationally agreed principles, goals and targets, utility, credibility, independence, impartiality, ethics, transparency, human rights and gender equality, national evaluation capacities, professionalism, enabling environment, evaluation policy, responsibility for the evaluation function, and evaluation use and follow-up. UNHCR subscribes to all of these norms, but identifies three – impartiality, credibility and utility – as primary and indivisible. Independence, for example, is not an end it itself, but strengthens impartiality and credibility.

UNHCR's Evaluation Principles

IMPARTIALITY

The key elements of impartiality are objectivity, professional integrity and absence of bias. The requirement for impartiality exists at all stages of the evaluation process, including planning an evaluation, formulating the mandate and scope, selecting the evaluation team, having access to stakeholders, conducting the evaluation and formulating findings and recommendations. Impartiality is achieved through (a) the professional integrity of evaluation managers and evaluation teams, and (b) absence of undue influence that may create bias; and is ensured through (c) supportive structures and processes that act as safeguards.

CREDIBILITY

Evaluations need to be credible if their intended users are expected to act with confidence upon their results and take steps to incorporate the lessons generated into policy, advocacy, programming, decision-making and implementation processes. Credibility is determined by the extent to which evaluation findings and conclusions are: (a) complete, unambiguous and informed by logic; and (b) adequately supported by evidence generated through appropriate methodologies; (c) reflective of the lived experience of people UNHCR serves in relation to the benefits or otherwise of the policy, programme or process being evaluated. Credibility requires that evaluations are ethically conducted and managed by evaluators who exhibit professional and cultural competencies.

UTILITY

In commissioning and conducting an evaluation, there should be a clear intention to use the resulting analysis, conclusions or recommendations to inform decisions and actions. The utility of evaluation is manifest through its use in making relevant and timely contributions to organizational learning, informed decision-making processes and accountability for results. Evaluations can also be used to contribute beyond the organization by generating knowledge and empowering stakeholders. Commissioners of evaluation should, where possible and appropriate, directly and meaningfully engage people UNHCR serves in the design, implementation and use of evaluation.

populations⁸ to ensure that all groups and identities within the populations UNHCR serves have equitable opportunities to be involved, and to contribute to the evaluation, irrespective of age, gender, ethnic, political or religious affiliation, or sexual identity.

The principle of '<u>do-no-harm</u>' and UNHCR's data protection and privacy principles are critical to determine whether participating in an evaluation would place any stakeholder or beneficiary

⁸ This policy invokes a step-change in the way in which evaluation engages with people UNHCR serves. In line with UNHCR's commitment to principles of accountability to affected populations (AAP), the participation of and accountability to people UNHCR serves will be firmly embedded in the conduct of evaluation. The policy recognizes that in certain circumstances, or at particular times, access to people UNHCR serves may be restricted, or it may be dangerous for them to engage with evaluation teams.

at risk; to protect the privacy, anonymity and confidentiality of participants; and to ensure that data collection is limited to only what is absolutely necessary for the evaluation. Effective use will be made of available and appropriate participatory tools and remote approaches to engage people UNHCR serves, and the extent of engagement will be recorded and reported on.

Access to implementing partners, government officials and other stakeholders is also a requirement to ascertain how appropriate and effective UNHCR's assistance has been.

All those carrying out or involved in evaluations in UNHCR shall be guided by and must adhere to these principles to ensure that (a) evaluations are fit for the stated purposes as set out in this policy; and (b) evaluation findings, conclusions, recommendations and proposed lessons to be learned are viewed with confidence by their intended audience and users within UNHCR, its partners and beyond.

OPERATIONAL FRAMEWORK FOR EVALUATION

Evaluation in UNHCR mirrors its organizational structure, operating at country, regional and headquarters levels. UNHCR will include systems and processes, human and financial resources, and incorporate demand- and supply-side elements. The aim is to drive forward improvements in how UNHCR commissions and uses evaluative evidence in strategy and programme design, both alone and through partnerships, for people it serves and in supporting global humanitarian public goods and UN systemwide accountabilities.

The Evaluation Office has two distinct but mutually reinforcing roles. First, the Evaluation Office plans, commissions, manages and disseminates independent global, corporate, L3, joint and UN system-wide evaluations as defined in the central evaluation workplan. Second, it supports the organization's evaluation function as a whole (at divisional, regional and country levels), including through normative, guidance, training, quality assurance and technical assistance roles.

Evaluations managed by divisions, bureaux and country operations are financed and led by these entities, with support from the Evaluation Office, as defined in this policy.

Levels of evaluation

In line with the roles, accountabilities and authorities for Headquarters, regional bureaux and operations, evaluation⁹ takes place at three levels in the organization:



GLOBAL LEVEL

Strategic evaluations are commissioned and managed by the independent Evaluation Office in line with the multi-year central rolling evaluation plan. They serve to provide coverage of UNHCR's Strategic Directions, global results areas, corporate policies and strategies, and of declared L3 emergency responses.

Additionally, thematic evaluations that pertain to more specific work of a particular division may be commissioned and managed by that division.



REGIONAL LEVEL

Thematic, programmatic, multi-country and country strategy¹⁰ evaluations are commissioned and managed by regional bureaux, driven by regional multi-year strategies and associated monitoring and evaluation plans, and the desire to document and scale up innovation.



COUNTRY LEVEL

Programme/project evaluations¹¹ included in multi-year strategy monitoring and evaluation plans are commissioned and managed by country operations. In the short to medium term, and at the request of the operation, the regional bureau may manage country-level evaluations where capacities are insufficient.

- **9** The main types of evaluations carried out under these respective levels and their key distinguishing features are listed in <u>Annex 1</u>.
- **10** Country Strategy Evaluations, which provide strategic inputs for multi-year annual planning, are currently managed by the Evaluation Office but will migrate, by 2026, to UNHCR regional management to align with the UNHCR's regionalization process and new accountabilities of regional offices. These evaluations serve both to strengthen performance at the country level and enhance the bureaux' role in second-line oversight.
- 11 Including evaluation as and where required by grant agreements in projects with earmarked funding.

Decision to evaluate

The decision to initiate an **independent strategic evaluation** at **the global level** is led by the Evaluation Office,¹² outlined in a multiyear central rolling workplan. This plan, which is the responsibility of the Head of the Evaluation Office, draws on consultations with the Senior Executive Team (SET) and senior management, divisions, bureaux and other independent oversight providers. The selection of what to evaluate is informed by:

- 1. Stipulations in UNHCR policy and strategy documents;
- Demand emanating from the development and implementation of global policies and strategies,¹³ in particular those governing the scope and direction of UNHCR's operational engagements, timed to ensure that the findings and recommendations inform the design of new – or the revision of existing – global policies and strategies;
- 3. The need to measure UNHCR's contribution to collective efforts, i.e. through joint and system-wide evaluations, following discussions with other UN agencies and partners;
- Demand from stakeholders, including people UNHCR serves, member States and other parties.

For management-commissioned divisional or sector-specific evaluations, including of global programmes, the decision to evaluate, and the commissioning and management of that evaluation rests with the Director of the relevant division as to whether and when an evaluation would be deemed useful.

At the **regional level**, the decision to evaluate is taken by the Regional Bureau Director and is guided by the following factors:

- Partnership, advocacy or programmatic approaches and interventions that are being applied in more than one country, where the opportunity to carry out a multi-country evaluation on one theme can enable cross-learning (and reduce evaluation costs);
- Accordance with provisions in Grant Agreements or Donor Contribution Agreements;¹⁴

¹² With the exception of divisional or sector-specific evaluations, which are commissioned by Headquarters divisions, as outlined earlier in the policy.

¹³ In line with UNHCR's policy on the development, management and dissemination of internal guidance material (revision forthcoming). Initiatives that fall outside the policy framework, but that should be considered for evaluation include the Global Strategic Directions, the Strategic Framework for Climate Action, and the like.

¹⁴ As per UNHCR/AI/2021/03 on the acceptance and signing of contribution agreements (cash or in-kind donations), both draft completed Grant Agreements Templates as well as specific Donor Contribution Agreements have to be sent to DER/Donor Relations and Resource Mobilization (DRRM) or to Private Sector Partnerships Service (PSP) for clearance. DER will liaise with the Evaluation Office for advice and guidance as appropriate.

- **3.** Joint approaches, following discussions, with other UN agencies and other partners; and,
- Evaluative evidence needs, including changes in regional context; feeding into regional and country multi-year plans; scaling up innovations; and ensuring overall coverage of programmatic areas.

At the country level, the decision to evaluate is taken by the Representative, in collaboration with the relevant regional bureau¹⁵ and is guided by these factors:

- needs for objective evidence in preparing or reviewing multiyear strategic plans, including to assess the outcomes and scalability of innovative programmes;
- 2. accordance with provisions in Grant Agreements or Donor Contribution Agreements;14
- joint evaluation initiatives, following discussions with other UN agencies and other partners (including government);
- 4. evaluative evidence needs at the country level, including changes in operational context; feeding into country multi-year plans; scaling up innovations and ensuring overall coverage of programmatic areas.

In line with COMPASS and results-based management, the decision by management to undertake evaluations supports strategy development at Headquarters, regional and country levels. Evaluation activities must be identified, recorded and costed in the multi-year monitoring and evaluation plan. They may range from full country strategy evaluations to project evaluations or even taking part as a case study in a larger global or regional evaluation – for example, for operations with smaller presence.¹⁶ These monitoring and evaluation plans must reflect an appraisal of the evidence gaps and accountability needs and choices of what to evaluate. Evaluative evidence should serve a specific identified need or requirement to support organization-wide learning and accountability.

¹⁵ The decision to initiate a Country Strategy Evaluation (as opposed to country-specific project or thematic evaluations) should be made with the Bureau Director. Further details are provided in Annex 1.

¹⁶ The choice of what theme, programme, project to evaluate is informed by the need to fill a specific evidence gap; to drive a shift in approach or to respond to a specific demand to rigorously document results in a particular area. The choice of the type of evaluation activity should be proportionate to the nature and size of UNHCR's operations in the country This falls in line with the AHC-O's Field Reference Group recommendation to consider alternative requirements for smaller operations in all Policy and Administrative Instructions while ensuring that UNHCR preserves the capacities of these operations to deliver. Smaller operations will be supported – technically and, where necessary, financially in the design and conduct of evaluation activities – by the regional bureau.

COVERAGE NORMS

In line with UNHCR's vision for evaluation, this policy sets out to provide a systematic, balanced geographic and thematic coverage of UNHCR's work. To do so, a set of minimum coverage norms have been established as outlined in Table 1.

Level	Туре	Commissioning unit	Frequency	Accountability for management response
Global – independent	Corporate policy, strategy, thematic	Evaluation Office	All substantive policies / strategic results areas at least once in 10 years.	SET member
	Emergency response ¹⁷	Evaluation Office	All L3s within 15 months of declaration L2 emergencies at the request of the Senior Executive Team or Regional Bureau	Assistant High Commissioner- Operations
Global – management- commissioned	Thematic or programme- specific evaluations	Division/Entity	Coverage and frequency determined by commissioning unit	Division/Entity Director
Regional	Multi-country, thematic, or programmatic evaluations	Regional Bureau	Coverage and frequency determined by commissioning unit	Bureau Director
Country	Country Strategy Evaluations	Regional Bureau	All operations should be subject to some form of evaluation activity during a multi-year strategy cycle, or least once every five years	Country Representative and Bureau Director
	Thematic, programme and project-level evaluations	Country or Multi-Country Operation	This coverage norm to be phased in over the life of the policy ¹⁸	Country Representative

TABLE 1. Minimum coverage norms for evaluation
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18 All regional bureaux will plan with country operations and liaise with the Evaluation Office on the type, timing and coverage of evaluations over a multi-year strategy cycle based on relevant criteria including composition and numbers of people UNHCR serves, the size of offices/operations and core activities.

¹⁷ UNHCR's engagement in Inter-agency Humanitarian Evaluations (IAHE) will take two forms: where the focus is on Humanitarian Response Plans, UNHCR will be a member of the Management Group where relevant. In the case of evaluations of single or multi-country Refugee Response Plans, UNHCR will lead. The modalities may vary.

Quality assurance

Global independent evaluations are managed by professional evaluators within the Evaluation Office. Evaluations commissioned by divisions, regional bureaux or country operations should be managed by senior colleagues within those offices with training in evaluation and no direct involvement in the management of the programme or project being evaluated.¹⁹

All evaluations are conducted by independent external evaluators, contracted individually or through a company, to ensure the objectivity and integrity of the process and product. Evaluation Office personnel, being both structurally and behaviourally independent from management, may in some instances take part as evaluators within evaluation teams.

Evaluation planning requires coordination and cooperation to ensure that the geographic and thematic coverage is appropriate and balanced over time.

Evaluations are planned, budgeted and tracked as part of the organization's multi-year planning cycle. Where an evaluation is decided upon outside the planning window (i.e. mid-year, due to changes in circumstances, or external demands), this should be recorded in the operation's or entity's strategy as part of an updated monitoring and evaluation (M&E) plan.

Quality assurance provisions covering all stages in an evaluation process will be provided in operational guidance that will accompany this policy with the objectives of:

- providing general guidance on conducting evaluations in UNHCR, covering the main steps required to manage and complete an evaluation, and the different roles, tasks and inputs required at each step;
- clarifying the expected quality standards in terms of evaluation process, content and products; and
- **3.** ensuring that all relevant stakeholders, including, where feasible, people UNHCR serves, have agency in the process of evaluation through involvement in informing evaluation questions, in providing evidence to inform findings, in the governance and oversight of evaluations through, where appropriate, reference or advisory groups, and in the utilization and dissemination of the results.

This requires those who commission evaluations to engage early in the planning phase with other relevant parts of the organization.

¹⁹ In bureaux, the most suitable evaluation manager is the Senior Regional Evaluation Officer. Where a country operation has an Evaluation Officer, Monitoring and Evaluation Officer, or Programme, Planning, Monitoring and Evaluation Officer, they should be considered for the role of managing the evaluation. An evaluation manager is ideally a P4 workforce member. However, in small offices, this may not be possible. Colleagues managing evaluations are provided with training and mentoring by the Evaluation Office throughout the evaluation process.

The Evaluation Office supports evaluation quality, through a number of measures including but not limited to:

- the provision of feedback on all draft terms of reference, inception and evaluation reports against bespoke standards and criteria (quality review);
- maintaining rosters of independent consultants and framework agreements with companies qualified to undertake high quality evaluations on topics relevant to UNHCR's mandate and work;
- managing an external technical quality assessment facility that provides independent benchmarking and time-series quality assessment data that allows UNHCR to report on a key performance indicator related to evaluation quality over time.

Finalization, approval and publication

In line with quality assurance standards, evaluation reports are submitted, together with the quality review, by the manager to the commissioner of the evaluation for approval, namely (a) to the Head of the Evaluation Office for global and L3 emergency evaluations, and (b) to the Head of Office (Director or Representative) for evaluations commissioned by management.

In the case of evaluations commissioned by divisions, bureaux or country operations, the approved final report will be submitted to the Evaluation Office, to be added to the global evaluation database, and for further dissemination. The Head of the Evaluation Office will only clear for publication evaluation reports that meet the minimum quality standards.

All evaluation terms of reference are required to include communication and dissemination standards and plans to fulfil our commitment to improve organizational learning and accountability. Standards are defined in the Evaluation Communication Strategy and should conform to UNHCR's style guide.²⁰ Communication plans should include stakeholder mapping of who the potential users of the evaluation are, and the channels and forms of communication. Evaluation managers shall ensure that the results of UNHCR's evaluation work are effectively communicated and disseminated, both internally and externally.²¹

²⁰ See: UNHCR Style Companion 2019.

²¹ An exception to putting an evaluation report in the public domain shall be in accordance with "UNHCR's Information Classification, Handling and Disclosure Policy, IOM/76-FOM/76/2010".

Management response and follow-up

Management responses to key findings and recommendations put forward in an evaluation report will be prepared within three months from the submission of the final report to the commissioner or, in the case of independent global evaluations, the SET.²²

Management responses²³ will be placed alongside the final report in the public domain. The management response will be uploaded into a recommendation tracking tool, managed by the Strategic Oversight Service.

Implementation of accepted evaluation recommendations will be reported on by management and tracked by the Evaluation Office for two years – after which any unimplemented recommendations will be recorded as such. The High Commissioner's Annual Report on Independent Evaluation, presented to the Executive Committee, will include a chapter on the performance of the evaluation function, including the timely preparation and implementation of the management responses.

Data management and data protection

Credible evaluations require and rely on timely access to quality data and information. Certain conditions are required to ensure this:

- Data and information that are captured and stored by UNHCR must be made available or otherwise accessible to evaluation managers and evaluators in a timely manner.
- Evaluations should make effective use of existing data and information (including for example, survey data, monitoring data and similar) before designing and implementing its own data collection exercises so as to avoid unnecessary duplication, costs and burdens on data collectors and respondents.
- All personal data regarding people UNHCR serves gathered during evaluation, whether from UNHCR or directly from the individuals, is subject to UNHCR's Data Protection and Privacy Framework,²⁴ which includes the <u>Policy on the Protection</u> <u>of Data of Persons of Concern to UNHCR</u>. Evaluations shall be conducted with due regard to the standards established by that Framework, including, inter alia, standards related to

²² The relevant SET member is nominated to coordinate the management response for global strategic / thematic evaluations.

²³ Generally presented in a matrix used to table all the evaluation recommendations, the degree of acceptance by management, and rationale for their decisions and follow-up actions agreed. Specific guidance on preparing a management response, including templates and practical advice, will be provided in operational guidance.

²⁴ The term "Data Protection and Privacy Framework" refers to all implementing instruments relevant to data protection, e.g., UNHCR Policies, Administrative Instructions, and other guidance.



data subject rights, the protection of data subjects providing information to evaluators, requirements for a legitimate basis for the processing of personal data, and the minimization of risk and harm to data subjects participating in an evaluation – all the while maintaining the integrity of the evaluation.

 All third-party evaluators and evaluation firms that process personal data on behalf of UNHCR and/or that manage (non-personal) data and information must adhere to applicable corporate policies and guidance. Whenever relevant, data sets containing personal data will be anonymized and published externally to the UNHCR Microdata Library (MDL) for reuse by others.

Information disclosure

All evaluation reports of UNHCR policies, strategies, programmes and projects that meet quality standards will be made publicly available.

The disclosure of evaluation products forms part of the transparency guarantee embedded in the principles of evaluation outlined in this policy. This includes the following points:

- Evaluation work plans, TORs and reports are publicly disclosed through the UNHCR Evaluation Office website.
- Management responses to all evaluations are publicly disclosed and included alongside the evaluation report, or as soon as they become available.
- The responsibility for disclosure rests with the commissioner of the evaluation, supported by the Head of Evaluation Office who has overall responsibility for the systems that support evaluation in the organization.

ROLES, ACCOUNTABILITIES AND AUTHORITIES

The High Commissioner

The High Commissioner shall:

- promote evaluation across UNHCR as a mechanism for corporate learning and accountability;
- safeguard the provisions of this policy, including coverage norms, resourcing, accountabilities and impartiality provisions;
- appoint,²⁵ with a single-term limit of five years, renewable once²⁶, the Head of Evaluation Office with the required experience, expertise, profile and qualifications; and
- with support by the Deputy High Commissioner, endorse the multi-year workplan and budget for independent evaluations submitted by the Head of Evaluation Office.

The Senior Executive Team (SET)

The SET supports the High Commissioner to strengthen the use of evaluation and is accountable for:

- providing overall governance and strategic direction for UNHCR's use of evaluation;
- promoting, steering and supporting the conduct and use of evaluation in strengthening a resultsbased management culture in UNHCR, including through the financing and management of evaluation, at country, regional and global levels within the organization;
- overseeing the implementation and follow-up of the multi-year central rolling workplan; and
- ensuring coordinated and timely clearance of management responses to independent global evaluations, follow-up and reporting on implementation.

Head of the Evaluation Office

The Head of the Evaluation Office has the authority to oversee the evaluation policy and its normative framework at the global level and to represent UNHCR's approach to evaluation as well as evaluation findings in global bilateral, multilateral and inter-agency forums. The Head of the Evaluation Office has the authority to commission global independent evaluations, as well as to provide global funds and other assistance, on a selective basis, to support evaluations that are commissioned by regional bureaux and country operations. The Head of the Evaluation Office provides clearance for the publication of UNHCR evaluations that meet appropriate quality standards.

²⁵ The Inspector General will play an advisory role in the selection and potential dismissal of the Head of the Evaluation Office. Dismissal of the Head of the Evaluation Office, due to poor performance, misconduct or malfeasance shall be effected in accordance with UNHCR policies and procedures, by the High Commissioner. The Head of the Evaluation Office may not be dismissed for public statements that are made in the conduct of his or her work and are consistent with UNHCR rules and regulations and the United Nations standards of conduct for the International Civil Service.

²⁶ The Head of the Evaluation Office will not be permitted re-entry into the organization at the end of his or her term. Furthermore, to avoid any real or perceived conflict of interest, the Head of the Evaluation Office shall not be assigned any other management responsibilities and will serve only in an advisory or observer role on committees or task forces established for management purposes.

The Head of the Evaluation Office is supported by a functionally independent Evaluation Office, and is accountable for the following actions:

- periodic monitoring and reporting to the SET on the implementation of the evaluation policy and strategy;
- preparing, based on a consultative process with divisions, regional bureaux and country operations, a global evaluation strategy and a multi-year evaluation workplan of independent evaluations to be carried out by the Evaluation Office;
- managing the Evaluation Office, its staff and budget to deliver effectively on independent evaluations;
- supporting the use of evaluation across UNHCR, including providing professional advice and guidance to senior evaluation officers in regional bureaux (see para. 62(iii)) and promoting effective implementation of quality assurance at all evaluation levels;
- ensuring that the development of policies and official guidance is informed by evaluative evidence to meet the needs of people UNHCR serves;
- supporting the High Commissioner to prepare their annual report on evaluation in UNHCR to the Executive Committee; and presenting findings and recommendations of specific evaluations to member States on a demand-led basis;
- supporting a global tracking system for evaluation recommendations to ensure follow-up and promote sharing of key lessons emerging from evaluations across the organization.

Directors of divisions, regional bureaux and Representatives

Directors of Divisions, Regional Bureau Directors and Country Representatives have the authority to identify the need for, commission and provide oversight of the use of evaluation in the operations they lead.

They are accountable for:

- planning evaluations that are consistent with multi-year strategies' M&E plans as well as the coverage norms, evaluation principles and quality assurance provisions outlined in this policy;
- allocating adequate human and financial resources for the management and conduct of planned evaluations, including contribution to peer networks and learning platforms;
- managing Senior Regional Evaluation Officers (regional bureaux only) and other staff with evaluation responsibilities;
- ensuring that a management response to key findings and recommendations is issued within three months of the finalization of an evaluation report;
- supporting the evaluation process, including by sharing suggestions for global independent evaluations and evaluations commissioned by HQ divisions; providing access to information which may be required; ensuring timely feedback and comments on drafts; and providing inputs on management responses as required;
- taking steps to implement and support follow-up actions to agreed recommendations and to ensure the wide dissemination and use of evaluation findings by staff and key stakeholders.
- **Country Representatives** are accountable for coordinating with the relevant regional bureau, and the Evaluation Office, as appropriate, on plans for evaluation, for quality assurance purposes, technical advice, publication and other support that may be required.
- **Regional Bureau Directors** are accountable for coordinating with and across Country Representatives to ensure that there is appropriate evaluation coverage of and support to country operations, and for monitoring country compliance (second-line oversight) in line with the provisions of this policy.

RESOURCES FOR EVALUATION

Human resources

To embed evaluation effectively into the working practices of the organization requires expertise at all levels, in Headquarters, regional bureaux and country operations. Adequate and professionally skilled human resources for the evaluation function in UNHCR shall be progressively achieved through the following:

- At Headquarters, by maintaining a core capacity to carry out and effectively communicate global/corporate policy, strategy and L3 emergency, joint and UN system-wide evaluations; develop and maintain strategy, guidance, quality assurance and technical capacity support to divisions, bureaux and operations strengthening capacity at these levels over the lifecycle of this policy.
- By maintaining a 50/50 ratio within the Evaluation Office of:
 (a) externally recruited evaluation specialists with the required competencies and expertise assigned to expert positions; and (b) existing UNHCR workforce with the required profile and experience assigned through the regular process following the rotation policy.
- By ensuring that, by 2026, all regional bureaux have capacity in place to support regional directors, strategic planning pillars and country operations to identify, commission and use evaluations and related tools in line with their multi-year strategies' M&E plans and wider evidence needs.
- By establishing non-workforce modalities for bringing in expertise in evaluation through consultant rosters, framework agreements or partnerships.

Financial resources

UNHCR will provide an appropriate budget for evaluation at a level commensurate to the organization's activities.

For independent evaluation work, the budget of the Evaluation Office will cover the costs of commissioning global policy and strategy evaluations – as well as contributions to joint and UN system-wide evaluations as outlined in the approved biannual workplan. The provision of technical, quality assurance and financial²⁷ support to regional and country-level evaluation and for maintaining the organization-wide quality assurance framework for evaluation will also be funded. Independent evaluations of large-scale (L3) emergency This will ensure that the evaluation function is both equipped with sufficient technical experience on and knowledge of up-todate evaluation practice, and knowledge and understanding of UNHCR's specific protection mandate, operations and work environment.

UNHCR is committed to ensuring that evaluation within the organization is sufficiently and sustainably funded, based on costed multi-year M&E plans at global, regional and country levels.

²⁷ The financial contribution of the Evaluation Office to evaluations commissioned at regional and country level will be phased out over the lifetime of this policy in proportion to the increase in allocation made at these respective levels to evaluation.

responses will be financed from the additional resources raised through supplementary appeals for the responses themselves.

The financing of divisional, regional and country-level evaluations will be through divisions, regional bureaux, regional and country operations allocating resources from their approved annual budgets. Depending on the availability of funds, these may be supplemented as appropriate by the Evaluation Office.

Table 2 provides a framework for the budgeting of evaluations at different levels across the organization.

TABLE 2. Sources of funding for evaluation

Level	Туре	Commissioning Unit	Funding Options
Global independent	Corporate policy, strategy, thematic, joint, synthesis	Evaluation Office	Evaluation Office Operating Limit budget (OL) and/or donor resources
	L3 Emergency	Evaluation Office	L3 Supplementary Appeal / earmarked resources
Global management- commissioned	Thematic or programme-specific evaluations	Division	Division OL and/or donor resources
Regional	Multi-country thematic, L2 emergency or programmatic evaluations	Regional Bureaux	Bureau OL and/or donor resources
Country	Country Strategy Evaluation	Evaluation Office / Regional Bureaux	Evaluation Office OL until 2026 then Regional Bureau OL
	Thematic, programme and project-level evaluations	Country Operation	Country operation OL and/ or donor resources, topped up by Bureau OL as needed (small operations)

Subject to availability of funds, UNHCR is committed to increasing the level of resources to sustain progress towards global parameters recommended for supporting the evaluation function.²⁹

²⁸ Resources earmarked from L3 Emergency Appeals for evaluation should automatically result in an OL increase for the Evaluation Office.

²⁹ The UNEG Norms and Standards of June 2016 recommend that benchmarks for resourcing of the evaluation function globally should be commensurate with the size and function of the organization. The United Nations Joint Inspection Unit report (JIU/ REP/2014/6) concluded that organizations should consider a range of funding that is between 0.5 per cent and 3 per cent of organizational expenditure.

PARTNERSHIP IN EVALUATION

UNHCR's evaluation policy is firmly grounded in greater interaction, cooperation and partnership with other organizations across and outside the UN system.

UN Inter-agency and system-wide cooperation

In support of progress towards the United Nations Sustainable Development Goals and in assessing the collective contribution of the UN system to results, its impact on the lives of those it protects and assists, and to enable the system to learn and adapt, UNHCR will increasingly seize opportunities to initiate, commission and manage evaluations jointly with other UN system organizations as relevant and appropriate.

UNHCR will continue to contribute to inter-agency evaluation work in the context of, inter alia, the Inter-Agency Standing Committee (IASC) Inter-Agency Humanitarian Evaluations, the UN Sustainable Development Cooperation Framework (UNSDCF) evaluations, and system-wide evaluations (SWE) and syntheses.³⁰

The Evaluation Office will contribute to existing and new normative guidance and methodologies on evaluation by participating in evaluation thematic networks within the UN Evaluation Group (UNEG).

Other external partnerships

In recognition that UNHCR and the UN system as a whole are one part of a global evaluation practice, the organization will seek out wider partnerships with networks, associations, institutions and individuals in all regions to strengthen the quality of our approaches to and methods of evaluation; in the conduct of locally appropriate and relevant evaluations; and in the dissemination and use of evaluation.

³⁰ In line with the Secretary-General's policy on independent system-wide evaluation and the United Nations General Assembly resolution 75/233 of 21 December 2020. "Quadrennial comprehensive policy review of operational activities for development of the United Nations system" (A/ RES/75/233).

MONITORING AND COMPLIANCE

Evaluation contributes evidence to UNHCR at all levels to identify and manage risks, in line with UNHCR's Enterprise Risk Management policy³¹ and strategy, and through the risk register tool.

The achievement of the evaluation vision and outcomes is also subject to risks, identified in the theory of change in this policy, including low demand for evaluation, insufficient or unstable financial and human resource allocation, and challenges to its impartiality, and hence credibility. The Evaluation Office, as the custodian of the evaluation function in UNHCR, will continue to review these risks, identify proactive and reactive treatments and act upon these as appropriate.

This policy is comprehensive in nature and shall be implemented across the organization. Compliance with the policy shall be monitored by the Evaluation Office at the global level, while regional bureaux shall support application of the policy in their respective regions.

An external evaluation of the UNHCR evaluation function shall be completed no later than 30 June 2026.

DATES

This policy enters into force on 1 October 2022 and will be reviewed by 30 September 2027.

CONTACT

The contact for this policy is the Head of Evaluation Office.

HISTORY

This policy revises and supersedes UNHCR's Policy on Evaluation of August 2016 (UNHCR/HCP/2016/2) which was reviewed in 2021.

31 See: Executive Committee of the High Commissioner's Programme (2019) Risk Management in UNHCR. Standing Committee 76th meeting. <u>https://</u> www.unhcr.org/5d81f961d.pdf

ANNEX 1. Types of Evaluation

Туре	Focus
Global Policy, Strategy or Thematic Evaluation	Addresses the relevance, performance and results of an organization-wide policy, strategy, framework or cross-cutting thematic area of corporate significance to UNHCR
	May also evaluate institutional practices, systems and processes related to organizational effectiveness and efficiency; or a function or service within UNHCR
	Cuts across geographies (one, several or all regions)
	Addresses an area of significant investment or strategic importance to UNHCR
Regional Multi-Country Programmatic or Thematic Evaluation	Addresses the relevance, performance and results of a programmatic area of intervention (e.g. livelihoods) or theme across one region, or multiple countries in one region
	Aims to generate evidence to inform regional and country multi-year strategies and section-specific plans with regionally relevant evidence
Country Strategy Evaluation	Addresses one country operation (or several, in the case of multi-country operations)
	Focuses on strategic positioning, comparative advantage, organizational results and performance, and partnerships over a period of three to five years
	Feeds into planning for next multi-year UNHCR country strategy
	Feeds into country-level UNSDCF evaluations
Emergency Response Evaluation	 L3 Addresses a specific L3 emergency (major UNHCR emergency response) Mandated by policy to be carried out within 15 months of the emergency's declaration Can be one country or multi-country May address a specific L2 emergency response or a thematic area L2, upon SET or Regional Bureau request L2 evaluations may be managed by the Evaluation Office, Regional Bureaux or Country Operations Can be one country or multi-country Addresses results and performance of UNHCR in an emergency context

Туре



and/

Focus

Joint Evaluation

Addresses the collective results and lessons from the assistance of multiple organizations and partners

Commissioned and managed jointly with other UN system organizations and/or other non-UN partners (whether member States, academic institutions or NGOs)

Includes, but not limited to, Inter-Agency Humanitarian Evaluations

Not necessarily mutually exclusive with the other types of evaluation listed here, which could all be carried out jointly with other partners



Assesses the changes in development outcomes of interest for people UNHCR serves that can be attributed to a specific programme or policy through a credible counterfactual



Programme and Project Evaluation Assesses the relevance, performance and results from a specific initiative or group of initiatives under the multi-year strategy

Supports learning related to the implementation of specific activities by identifying what is working and what can be improved and provides evidence for accountability purposes by examining the results delivered by the activities for beneficiaries and partners compared with planned results

Could focus on pilot or innovations where being used as a means of determining the best way to deliver assistance to achieve protection outcomes – providing credible evidence about pilots and pilot evaluations is important in identifying the range of programming modalities and instruments at UNHCR's disposal



Other evaluative activities

Other evaluation activities may include, inter alia, the following:

Country case study as part of regional or global strategic or thematic evaluations

Evaluability study that assesses the theory of change, data availability and related factors in determining whether and how to evaluate

Baseline study that provides the foundation data for an evaluation at a later stage

Evaluative review which draws upon some of the approaches and tools of evaluation, but is smaller in scope and/or less in-depth than a full evaluation

Evaluation synthesis that draws evidence from a set of evaluations (and, often, other sources) around a theme and/or set of common questions

ANNEX 2. Theory of change

UNHCR's mandate is to safeguard the rights and well-being of refugees, internally displaced and stateless persons. UNHCR strives to ensure that everyone can exercise the right to seek asylum and find safe refuge in another area (internally displaced persons – IDPs) or state (refugees) and to return home voluntarily.

Achieving these aims depends, in part, on UNHCR's continued efforts to engage people it serves, directly build a culture that is results-orientated, risk mature, and evidence-driven.

This will be achieved through addressing both demand and supply dimensions related to evidence use. On the supply side, a gradual expansion is required in the number of evaluations at country and regional level where the evidence base needs strengthening and where large programmes or innovative projects are being undertaken that need to demonstrate value and/or scalability. On the demand side, a range of efforts are required to demonstrate the value and use of monitoring and evaluation in improving programming, in demonstrating results, transparency and raising resources, not least the need to recognize the value of evaluation to amplify the voices of people UNHCR serves to understand the impact of the organization's reforms and how it can work better.

Structurally, these changes will be realized through adjusting the way that evaluation is commissioned, staffed, managed and financed throughout the organization. Capacity will be strengthened at country and regional levels to identify evidence gaps, commission evaluations and bring evidence at the right time in the right way to influence policy and practice. The Evaluation Office will focus on supporting the increased, embedded and effective use of evaluation as a tool of management by developing systems and platforms for improving evaluation practices, quality assurance and sharing lessons and evidence. As part of the organization's investments in the results-based management (RBM) system, the financing of evaluation, to reach agreed coverage norms, will be embedded into operational budgets at global, regional and country levels and incorporated into the respective multi-year planning cycles.

One of the critical assumptions in achieving these aims is that evaluation is increasingly championed by management at all levels as a useful tool to enhance UNHCR's performance and for demonstrating the organization's achievements to its member States, partners and to people it serves. UNHCR cannot achieve its evaluation vision alone and will increasingly work with and through other UN system organizations, research institutions, NGOs and CSOs, including refugee-led organizations to generate and use evidence and build capacity to do so. The latter implies an environment where colleagues routinely collect and use evidence, including from evaluation, in designing new strategies, plans and programmes, and when reporting on results for people UNHCR serves.

ANNEX 3. Evaluation and complementary functions

Evaluation and oversight

The Evaluation Office, alongside Internal Audit and the Strategic Oversight Service and Investigation Service of the Inspector General's Office (IGO), collectively constitute UNHCR's internal independent oversight apparatus as outlined in UNHCR's **Policy on Independent Oversight** (2019).³² The Evaluation Office, and the strategic evaluations that it produces, constitute part of 'third-line' oversight – being structurally independent from management.

Evaluations commissioned by divisions, regional bureaux and country operations also contribute to the oversight function of the organization, as part of the second line. Irrespective of who commissions an evaluation, all evaluations in UNHCR follow the norms set out in this policy and conform to the UNHCR evaluation quality assurance processes which include safeguards for impartiality.

To ensure complementarity and coherence between oversight functions, and avoid overlap, duplication, and prevent gaps in coverage, the oversight providers share and seek to harmonize workplans and 'third-line' activities.³³

Evaluation and results-based management

In 2021, UNHCR introduced COMPASS, a renewed approach to results-based management (RBM) which includes a multi-year strategic

In support of 'second-line' oversight, the Evaluation Office issues administrative instructions and guidance, offers advice to commissioning units and quality-assures all final reports prior to publication.

The Evaluation Office, while not directly responsible or accountable for evaluations commissioned by divisions, bureaux and country operations, also promotes coordination at other levels, largely through reviewing and advising all parts of the organization on multi-year evaluation planning.

³² UNHCR Policy on Independent Oversight. UNHCR/HCP/2019/2. The policy also outlines the external independent oversight functions, including external audit, carried out by the Board of Auditors, and reporting to the General Assembly through the relevant committee; external inspection, carried out by the Joint Inspection Unit, which is mandated to carry out inspections and evaluation aimed at improving management and methods across the United Nations system; external investigation, carried out by the Office of Internal Oversight Services (OIOS), and focused on investigating any reports of violations of United Nations regulations, rules and administrative issuances; and external evaluation, also carried out by OIOS (Inspection and Evaluation Division), which, in accordance with its mandate from the General Assembly, evaluates the efficiency and effectiveness of the implementation of the programmes and legislative mandates of the organization. However, since the establishment of the independent Evaluation Office of UNHCR through the policy of 2016, and the maturation of the function, OIOS has not carried out an external evaluation of UNHCR since 2017 [E/AC.51/2020/8].

³³ This includes two consolidated tracking platforms comprising respectively independent oversight entities' workplans and recommendations, both of which are maintained by the IGO on behalf of the independent oversight community.

planning cycle, a global results framework and a software tool for planning, budgeting, monitoring and reporting on results. This is transforming how the organization plans, achieves and shows results.

Evaluation is embedded in the RBM approach as a management tool and part of the strategic planning cycle. It contributes to the assessment of past performance, shows the results achieved, and provides evidence to inform the design of future strategies and plans.

Evaluation also serves to assess objectively whether results-based management as an organizational approach and system has resulted in better outcomes for people UNHCR serves. In this sense, evaluation is key to an effective results agenda, to determine what the organization's work achieves and whether it is on the right track.

Evaluation differs from, but is complementary to, results monitoring, which is structured around specific indicators and metrics, and which aims to track progress towards set targets. Monitoring provides answers to the question of whether UNHCR (and its implementing partners) is on track against its own targets, while evaluation goes deeper, taking an impartial look at the results achieved, the reasons why, and identifying good practices and lessons to take forward.

Evaluation and knowledge management

UNHCR is committed to strengthening its knowledge management systems³⁴ which utilize multiple channels and approaches to store, share and utilize evidence in an increasingly devolved structure. Beyond the Evaluation Office (and management commissioning evaluations), other key parts of UNHCR that generate knowledge include the Global Data Service and research generated by divisions.

Evaluation plays an important role as a knowledge contributor and a supporter of adaptive practice through systematically generating, distilling, disseminating and facilitating the learning and transfer of evaluative evidence and lessons across the organization and beyond.

The Evaluation Office will continue to draw from and build upon structures, processes and networks (both internal and external) to improve the translation of data and evidence into timely knowledge for decision-making. This will be done through establishing, jointly with other divisions and units as appropriate, networks of focal points and practitioners, platforms for learning and sharing evaluative evidence, stronger communication approaches, and mechanisms to better feed evidence into practice. Within this cycle, evaluation draws on impartial data and evidence generated through surveys and other forms of assessment, and in the collation and monitoring of results.

³⁴ The UNHCR Management Response to the Multilateral Performance Assessment (MOPAN) of UNHCR 2017/18 noted that "UNHCR acknowledges that learning and knowledge management systems need to be reinforced and is revising its RBM system as part of this effort". See: <u>https://www.mopanonline.org/assessments/unhcr2017-18/UNHCR%20Management%20response.pdf</u>

