

Review of Ethics Principles and Guidance in Evaluation and Research

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Executive Summary

This report summarises the findings of the first phase of a review of DFID's 2011 Ethics Principles for evaluation and research and the accompanying Guidance Document. It provides a light touch analysis of ethics principles, guidance and practice currently used by DFID, other donors/commissioners, and providers of evaluation and research to DFID.

Evidence base

This paper builds on:

- A literature review of over 120 written sources, including policy and practice reports, web pages, blogs, journal articles and books issued by donors, research funders, evaluators, academics and professional associations;
- Interviews with 28 key informants from DFID, research and evaluation commissioners (academic, International NGO, private sector) and professional associations, and;
- A survey of 48 DFID evaluation suppliers and research organisations.

Content

The report is divided into three parts:

- Part A frames definitions of ethics in international development evaluation and research
- Part B situates ethics in current international development evaluation and research practice
- Part C highlights gaps in current practice and provides suggestions for moving forwards.

The report contains four key findings and one overall recommendation.

Key Finding 1: Overall, there appears to be a lack of shared understanding, both within the literature reviewed and amongst survey and interview respondents, of what ethics are and their role within international development evaluation and research. Yet, failure to consider ethics can have adverse consequences for those intended to benefit from international development. It will be important for DFID to clarify its understanding of ethics, how these fit in with other components of good evaluation and research and to frame these within the specific context of international development.

Key Finding 2: Emphasis is placed on ethics in the design phase, with less consideration during implementation, dissemination and communication phases. There are good practice examples from other organisations that DFID could draw on as it revises its Guidance for Ethics in Evaluation and Research.

Key Finding 3: There are considerable discrepancies in how ethics feature in the work of different organisations undertaking evaluation and research. Within these organisations, practice also varies between different disciplines. Certain sectors, primarily health, and certain types of institution tend to have well defined ethics procedures, whereas others don't.

Key Finding 4: There are a number of gaps and limitations that need to be addressed: in DFID's own principles and guidance, as well as by the sector. The report identifies these and provides recommendations for moving forwards.

Overall recommendation: DFID has a responsibility to provide clearly articulated ethics principles, to communicate these effectively to those with whom it works and then hold different parties to account for meeting them. All this, within a context where the need to balance possibly conflicting ethical issues is understood as part of a process oriented approach.

Concluding thought: This light touch review is in no way exhaustive and aims to contribute to collective learning on improving ethical decision making in international development practice. Ethics are not a bureaucratic hurdle but a requirement of an everyday practice that seeks to deliver more relevant and impactful research and evaluation.

Introduction

This report summarises the findings of the first phase of a review of DFID's 2011 Ethics Principles for evaluation and research and the accompanying Guidance Document. It provides a light touch analysis of ethics principles, guidance and practice currently used by DFID, other donors/ commissioners, and providers of evaluation and research to DFID.

The second phase of the work, to be carried out in the first quarter of 2016, will build on the findings of phase one in order to produce revised guidance for DFID staff and suppliers¹ who are involved in evaluations and research.²

Report Structure

The report is divided into three parts:

- Part A frames definitions of ethics in international development evaluation and research
- Part B situates ethics in current international development evaluation and research practice
- Part C highlights gaps in current practice and provides suggestions for moving forwards.

Evidence Base for Findings

This paper builds on:

- A literature review of over 120 written sources, including policy and practice reports, web pages, blogs, journal articles and books issued by donors, research funders, evaluators, academics and professional associations (See Annex 7). Documents were obtained through an online search and from interviewees and survey respondents. The guiding documents relating to ethics of 25 organisations and professional associations were also reviewed³;
- Interviews with 28 key informants from DFID, research and evaluation commissioners (academic, International NGO (INGO), private sector) and professional associations (see Annex 6), and;
- Survey responses from 48 DFID evaluation suppliers and research organisations⁴ (see Annex 2).

Snowballing and backward snowballing⁵ techniques were used for data gathering. Requests for contributions were distributed internally within DFID, to DFID's existing list of evaluation suppliers and research providers, and to the OECD DAC EVALNET network. Southern based organisations were included in both interview and survey lists.

¹ While this guidance will be of interest to DFID grantees, it will not provide specific guidance for DFID grantees who commission their own evaluations.

² The Terms of Reference can be found in Annex 8.

³ DFID, UNEG, ADB, OECD DAC, Governments of Portugal, Netherlands, Finland, Scotland, Japan, Australia, UK Evaluation Society, Canadian Evaluation Society, American Evaluation Association, Australasian Evaluation Society, UNFPA, UNDP, WIPO, IOM, Research Council UK, ESRC, GSR, IDRC, New Zealand Social Policy Evaluation and Research Unit (Govt) and Evaluation Association, Children's Investment Fund Foundation and the Academy of Social Scientists.

⁴ The survey was sent out to 57 evaluation and research providers. They were asked to forward the survey on to their consortium partners. We do not know how many individuals received the survey request.

⁵ This involved looking at the reference lists of publications and identifying other relevant publications on the same research question and reviewing those publications. This was repeated. The methodology also drew on Hagen-Zanker and Mallett 2013 "How to do a rigorous, evidence-focused literature review in international development. A guidance note" and DFID 2013 "Assessing the Strength of Evidence. How-to-Note".

PART A. FRAMING ETHICS IN INTERNATIONAL DEVELOPMENT EVALUATION AND RESEARCH

Part A of this report looks at ethics in international development evaluation and research to explore:

- Current definitions;
- Relevance of ethics within broader evaluation and research processes and within an international development context.

A.1 Current definitions of ethics in international development evaluation and research

The literature review and survey and interview responses indicate that there appears to be a lack of shared understanding of what ethics are and what they refer to within international development evaluation and research guidance. This has led to: a tendency to generate lists of issues labelled as “*ethical*” (Duggan and Bush 2014: 5); a range of approaches taken by different organisations (Section B.2) and; a failure to clearly delineate ethics from standards and competencies (See Section A.2 and Annex 1). The guidance produced by organisations often doesn't provide clear definitions. The DFID Principles (2011) and the UN Evaluation Group (UNEG) Ethical Guidelines for Evaluation (2008), for example, do not provide a definition of “Ethics”.

The Economic and Social Research Council (ESRC) Framework for Research Ethics (2015) offers the following interpretation of ethics as “*the moral principles guiding research, from its inception through to completion and publication of results and beyond*”. The Australasian Evaluation Society (AES) definition is more succinct, if a little simplistic: “*Ethics refers to right and wrong in conduct*”. The idea of being right or wrong is also reflected in the academic literature (Newman and Brown 1996: 20; Duggan and Bush 2014 and 2015) as is the focus on fair and just conduct or behaviour (Simons 2009). Other commentators break ethics down into categories such as personal, professional and global (Colero undated).

In this paper, we use the term “ethics” to refer to culturally driven choice making around the moral values that drive behaviour in the specific context of commissioning and undertaking evaluation and research. We use the term “ethical” to refer to “right⁶” or agreed practice within the specific, culturally defined, institutional context in which the practice is being carried out. It is important to note this report's focus on ethical considerations in the professional practice of international development evaluation and research. It is not a paper on the ethics of international development more broadly.

Principles of ethics can be provided by organisations to support staff decision making around what broadly constitutes “right” behaviour, whereas **Codes of Conduct** lay down organisational rules as to what constitutes agreed values and behaviours in their specific

⁶ “Right” is used, as opposed to “appropriate” or “correct” to highlight that these are values. It is the author's opinion that there is no one “correct” practice. Instead, there are various decisions that need to be made, based on the ethics principles agreed by an organisation.

context. **Guidance** can support decision making where specific contextual situations mean that rules conflict or unique responses are required (Newman and Brown 1996). All three have complementary but distinct and necessary roles to play.

Underlying ethics are different theories of what constitutes “right”. These are culturally specific. In the West, ethics have been influenced by the principles of acting in ways that benefit individuals and society (Aristotle), respect others (Kant) and that work for the benefit of the greater good (Utilitarianism). More recently and globally, ethics have been influenced by commitments to promote justice (e.g. Rawls 1971) and to enable the enjoyment of rights (see Newman and Brown 1996). There is also a growing recognition of the necessity to engage in inter-cultural ethical dialogue in view of the recognition of the different ethics principles that operate between different groups of people.⁷

For our purposes here, it is important to note that ethics:

- a) are about the different behaviours and relationships involved throughout research and evaluation processes- from commissioning and design through to data archiving;
- b) help us to balance the goals of research and evaluation with the rights and interests of those being evaluated or researched, and;
- c) are subject to differing interpretations and complex judgements made in unique circumstances.

A.2 Ethics: A distinct piece in supporting evaluation and research quality

This review has revealed a lack of clarity and some confusion in the use of the term “ethics” in relation to the other necessary components of good research and evaluation. Sometimes it is used to describe decisions that are in fact methodological or legal choices, as opposed to values or behavioural choices (see the review of DFID’s principles, for example, in Annex 1). A failure to clearly de-lineate expected values and behaviours from expected practice, activities and products is confusing. More importantly, it also means that opportunities to understand how our values and behaviours affect our design, practice and our products are lost. Failure to frame the term as part of our everyday behaviour and professional practice has also led to a situation where: “*Unethical behaviour becomes identified too easily as having to do with the extraordinary and with others rather than our own ordinary, everyday behaviour*” (Newman and Brown 1996: 2).

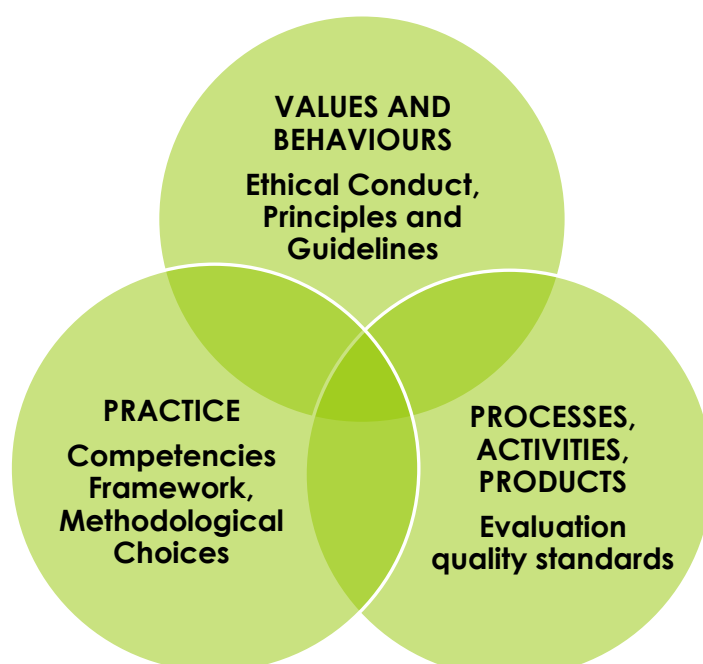


Figure 1: Dimensions of quality evaluation and research

⁷ For example, see Hudson 2010 et al for [Guidelines for Māori Research Ethics](#).

Figure 1 illustrates how ethics fit with other dimensions of quality evaluation and research practice⁸. It is important to note that all of these elements are inter-twined and the separation is not always clear-cut. Duggan and Bush (2014) give the example of the following ethico-methodological situation: an evaluation team choose a methodology that “disappears” key stakeholders and thereby misrepresents the effects of a program and further marginalizes an already marginalized group. Had methodological choices been guided by ethical principles of rights or social justice, different choices would have been made.

A.3 Ethics and international development evaluation and research

This review found various examples of where ethics were seen by evaluators or researchers to be “*not relevant to the types of evaluation we do*” (see survey responses in Annex 2) or where ethics were simply invisible in debates. Yet, evaluation and research in international development requires on-going values based choice making that lead to real consequences for people living in poverty who may have very little power to engage in or define research and evaluation agendas and processes. Working to agreed principles and standards of ethics help ensure that choice making goes beyond discussions around methodology, logistics and broad professional standards and into a consideration of the consequences of choices for those affected by them.

In this section, we acknowledge that the very fact of working in an international development context brings with it ethical dilemmas related to a meeting of different cultures and languages, different political interests as well as to disparities in power, income and access to information and other rights. Having clear, defined principles of ethics can support DFID commissioned researchers and evaluators to navigate through these dilemmas and the complex balancing of different ethical values.

Failure on the part of research and evaluation commissioners, funders and practitioners to consider ethics “*can lead to the opposite results intended by international development organisations- they can actually worsen the situation for participants in the research and evaluation process, their wider communities and even the evaluators and researchers themselves*” ([Australian Council for International Development 2013](#): 4). It can:

- lead to a reinforcement of discriminatory or unjust social relationships, including elitism and managerialism and the exclusion of key stakeholders;
- put participants at risk of recriminations or unsolicited identification;
- generate or worsen conflict;
- give rise to cross-cultural issues between evaluators and researchers and those engaging with them that can affect the results;
- create false results leading potentially to the wrong programming decisions being made and;
- lead to a failure to learn and share learning. While good practice may refer to “dissemination and communication” (as, for example, per [DFID's Research Open and Enhanced Access Policy](#)), ethics will require us to dig deeper and respect principles of social justice and rights, for example, and require us to ensure that all stakeholders, even the poorest and illiterate, have access to results in appropriate formats.

⁸ Adapted from Aotearoa New Zealand Evaluation Association (2015: 11) and also inspired by Duggan and Bush (2014)

Section Summary: “Ethics” refer to choice making around “right” and “wrong” values and behaviour in evaluation and research. They guide us in our behaviours and relationships – from commissioning through to design and data archiving. They are subject to differing interpretations and complex judgements that are context specific. Ethics are one distinct piece of what constitutes good research and evaluation. Not following principles of ethics can harm evaluation and research outcomes. There are distinct ethics considerations arising out of the international development context.

Overall Section Recommendation: As DFID revises its principles and guidance, a clear definition of ethics, a clarification of purpose and a de- lineation from other components of good research and evaluation practice in an international development context would be helpful. Also the role and use of the Principles should be agreed and communicated.

PART B. SITUATING ETHICS IN CURRENT INTERNATIONAL DEVELOPMENT EVALUATION AND RESEARCH

This section summarise an analysis of:

- DFID's existing principles, guidance and monitoring mechanisms;
- Practices of different INGOs, multilaterals, bilaterals and academic institutions.

B.1 DFID’s existing principles, guidance and monitoring mechanisms

B.1.1. DFID Ethics Principles for Research and Evaluation

DFID's ten Ethics principles have been an important first step in attempting to systematise consideration of ethics across different sectors and different types of research and evaluation. However, interviews with DFID staff did not indicate that these are known or used widely. Of the 19 DFID supplier survey respondents who said that they used external guidance, 3 cited DFID's ethics principles/ guidance. This indicates that there is significant scope to enhance both communication and usage.

A rapid analysis was conducted of DFID's ten ethics principles. This analysis, including the list of principles, is contained in Annex 1. In summary, it was concluded that there is some inconsistency, confusion and duplication in the current set of Principles.

Recommendations for ensuring that Principles are fit for purpose are:

- **Define** clearly what is meant by “ethics” and how these inform broader guidance on evaluation and research decision making.
- **Review** the principles in the light of this definition.
- **Produce a new set of principles.** This would involve clarification, merging, removing duplication and shortening existing principles into a memorable handful of high level principles of ethics that are then expanded in the guidance. This will also facilitate use. Broader headings could include “Maximise benefit and minimise harm”, “Research and

Evaluation Merit and Integrity”, “Justice”, “Respect for human beings”.⁹ These could then be expanded on in the guidance to include lower level expectations around, for example, confidentiality and consent.

- Explore how revised ethics principles for evaluation and research **will connect with other areas of DFID’s work**, and with the principles laid down in the 2015 Smart Rules. Specific recommendations can be found in Annex 1.

B.1.2 DFID Framework for Ethics in Research and Evaluation- Guidance Document

DFID’s current guidance contains important clarification and detail to guide staff and evaluation and research teams. Revisions to the guidance will be building on a good foundation. However, it appears that one of the biggest problems has been around a failure to successfully communicate the guidance. For example, the guidance is not publically available on the internet nor is it a systematic part of the induction of evaluation and research staff in DFID.

In terms of implementation, a brief exploration revealed that a number of key requirements have yet to be implemented. For example:

- **Use of Ethics Principles (para 7):** The requirement that DFID’s ethics principles be attached to all terms of reference for research and evaluation has yet to be met with any frequency or consistency. The guidance itself does not appear to be used by many staff.
- **Provision for independent review (para 22):** With regard to the evaluation function, DFID’s independent quality assurance service provides for limited review of ethics considerations in terms of reference, inception, mid-term and final reports for evaluations that meet the financial threshold. There does not appear to be any monitoring or quality assurance of research or evaluations that fall under the threshold from an ethics perspective. Furthermore, there are no standard quality assurance processes for research.
- **Provision of staff review (para 8 and 9):** There was little evidence that the current guidance is known and used- either internally or externally.
- **Use of Ethics Committees (para 3):** According to the findings of this light touch review, while ethics committees might be used systematically in the field of health research and some health evaluations, they are not used systematically, if at all, in other sectors and in most evaluations.
- **Requirement that research/evaluation findings be disseminated in a suitable format for participants in the research/evaluation (para 60).** This is not carried out systematically. See also [DFID’s working paper on beneficiary feedback](#).

Recommendations

- Re-write the guidance in view of revised principles, as outlined above. Current guidance would benefit from some **stripping down and removal of detail** on considerations that are better placed under methodological choices or quality standards.
- Going forward it will therefore be as important to **focus on communication and use** as on revising specific content. This includes enhancing the messaging that ethics are a core component of evaluation and research quality.

⁹ [ACFID \(2013\)](#) provide a good example of a concise set of memorable principles.

- In terms of content, staff interviewed considered that they would benefit from **specific guidance on emerging topics (See Section C below), a set of open questions or a practical checklist** or flowchart to support decision making. This would help them decide where their responsibility and that of others lies, what mechanisms are in/ should be in place, what tools are available, where ethics review is required and whether there are specific considerations for certain types of evaluation and research. It might be worth considering inclusion of ethics explicitly in the Smart Rules or Business Case template. Staff were clear that it would be important for guidance to be proportionate to the resources that they have available, practical and well communicated. Also, staff felt that it would be helpful to understand whether there are certain institutions that have practices that can be relied on with some confidence.
- Guidance would be helpfully provided **per stage in the evaluation and research process**. The AES Guidelines provide a user friendly model that could be drawn on.
- It will be helpful to clarify different responsibilities and governance arrangements for ethics. See Section C.1.
- The **differences between evaluation and research** are such that they warrant some individual attention. The overall approach to guidance on evaluation and research within DFID is inconsistent. Sometimes it covers both functions, sometimes it is separate. If DFID wants ethics guidance and principles to cover both functions then one approach is to contain overarching principles and guidance with a section that pulls out the specific ethics dilemmas that arise from the different purposes that underlie each function. See Annex 3 for further discussion of this area.
- DFID to consider whether **ethics principles** should go beyond evaluation and research and cover **all data collection exercises that DFID engages in**. Guidance would need to be tailored to different forms of data collection, however.

B.1.3 Other mechanisms for enhancing the use of ethics in evaluation and research

- **Tender documents.** There were some examples of requirements to consider ethics in tender documents. For example, in health related research and in a recent tender for a DFID anti-corruption research programme. This, does not yet, however, appear to be consistent practice across all research and evaluation.
- The **“Statement of Priorities and Expectations for Suppliers”** under a Framework Agreement includes areas that could be informed by ethics such as integrity, transparency, self-disclosure, conflict of interest. However, these are not positioned within an ethics framework.
- [DFID's “Research Open and Enhanced Access Policy”](#). This appears to be limited to the research function and is not yet well known across the organisation. See also Section C.4 below. It includes a set of open questions to be considered during the bidding process.
- **Independent Quality Assurance for Evaluations:** “SEQAS” templates require some limited consideration of ethics during review of Inception, Baseline, Mid-term and final reports¹⁰. However, there is no reference in the templates to DFID's principles or guidance nor is there reference to ethics in the templates for quality assurance of Terms of Reference. DFID should consider reviewing the SEQAS templates once the revised principles and guidance have been approved. Furthermore, it is worth noting that many evaluations do not go through SEQAS. **Evaluability assessments** are also an important mechanism that DFID could build on as part of a broader commitment to ensuring standards of ethical practice in evaluation. Again, it is important to flag that there are no similar mechanisms for research.

¹⁰ It is outwith the scope of this review to examine the extent to which QA reviewers' comments regarding ethics are taken on board during revisions by contractors or the quality of the QA reviews in terms of ethics.

Recommendations

- **Expand governance mechanisms for consideration of ethics in evaluation and research (and possibly other data collection exercises).**
 - **Clarify responsibilities internally.** Who should staff refer ethics concerns on to? What are the roles of procurement? Of Senior Responsible Owners? Research and evaluation management teams? See also Section C.1.
 - **Consider inclusion of ethics in the Senior Responsible Owner risk matrix.** A failure to consider ethics in the management of research and evaluation (and other data collection) can lead to a number of risks. Integrating a column on ethics could be a useful addition to the matrix, without requiring a new governance mechanism.
 - **Consider an internal or external ethics referral panel.** This could be ODA Whitehall related, it could be a pilot bilateral referral panel or it could be an internal mechanism, led by an **Ethics Champion**.
 - **Consider a mechanism for logging ethics questions and responses.** Currently ethics issues are resolved on an ad hoc basis and it may be possible for the same ethics question to elicit two different responses. Logging questions centrally could support capacity building and clarify.
 - **Consider inclusion of ethics into annual review processes for research programmes.**
 - **Consider more systematic inclusion of ethics in procurement processes.** This could include building on the set of open questions required from those bidding for a research contract as part of the Research Open and Enhanced Access Policy.

B.2 Practices of different INGOs, multilaterals, bilaterals and academic institutions

The findings in this section have been obtained through literature review, interviews and survey.

B.2.1 Findings related to overall practice of ethics in international development evaluation and research¹¹

It has been observed that **limited attention has been paid to the ethical dimensions of evaluation** i.e. how the research or evaluation was conducted in fair and just ways, as opposed to whether it is useful, rigorous or robust. An apparent focus on ethics as about "worst case scenarios" rather than our everyday values and behaviours has led to a culture highlighted by interviewees where we have seen an **increase in procedures and mechanisms**, such as the growing requirement for review by Ethics Review Boards. While these are important, there are two concerns with this approach. Firstly, some commentators have questioned the extent to which these mechanisms have become as concerned with control and reputational risk management as the promotion of ethics in day to day practice. Secondly, an over reliance on ethics review boards may lead to the situation where stakeholders see ethics as "*not relevant to my work*" instead of seeing them

¹¹ This section draws heavily on the work of Simons (2006 and 2009) and Munslow (2015), as well as findings from the primary research conducted for this review.

as informing the day to day making of “right” or “fair and just” choices in a profession that does have impacts on people’s lives. Even if these might not necessarily be at the extreme end of critical life/death decisions that may inform the medical profession, for example.

In terms of prioritisation between different sets of ethical considerations, it is important to note the **dominance of the ethics of care or “do no harm” principles**. These involve, for example, considerations relating to informed consent and protection of anonymity. There appears to be less debate amongst interviewees, survey respondents and some of the organisational policies reviewed around broader ethical concerns such as justice, working for the common good etc.

There are gaping discrepancies in how ethics feature in the work of different organisations and different disciplines within those organisations. Certain sectors, primarily health, and certain types of institution tend to have well defined ethics procedures, whereas others don’t. It is important that DFID and others do not assume that ethics are being adequately addressed by research and evaluation suppliers.

There is a disproportionate focus on ethics in the design phase, at the expense of implementation, and follow up activities. This is discussed in more detail in Section C.2.

B.2.2 Findings related to the practice of specific organisations and associations

B.2.2.1 Guiding Frameworks

For evaluation, cross- organisational ethics guidance have been set by the UN Evaluation Group (UNEG 2015), as well by the OECD DAC Quality Standards for Evaluation (2006). For research, overarching guidance has been developed by sector bodies. For example, for social science, the UK ESRC and the UK Government Social Research (GSR)¹² have issued guidance¹³. Some individual organisations and institutions have used these as governing texts (Australian DFAT, UNFPA for example); others have adapted these or developed their own principles and/ or guidance.

This review’s survey of research and evaluation providers revealed that, on paper at least, 90% of respondents had a standard set of ethics principles/ guidelines/code of conduct that refers to Ethics. See Annex 2 for findings.

A diverse range of principles were found in the review of the ethics related guiding documents of different organisations and professional associations. Arguably, some of these would fall under standards of evaluation and research quality (e.g. utility) or standards of international development practice (e.g. gender responsive).

The most frequently cited principles referred to obligations to participants (i.e. consent, diversity, welfare of participants, justice, avoidance of harm, behaviours related to respect for rights, cultural sensitivity - 16 out of 25 documents), confidentiality and privacy (10), honesty and integrity (8), quality of methods and data (8), independence (6), conflict of interest (6), competence (5), transparency (5), impartiality (4), ensuring participation from

¹² DFID is not a member of the GSR and is therefore not signed up to these.

¹³ While these have been developed primarily for the UK context, they are of relevance in the context of international development.

women and socially excluded groups (4) utility (3), and accountability (2). Research institutions will also refer to responsible publication, for example, which covers the avoidance of wasteful and duplicative publication¹⁴. Annex 5 provides a comparison of principles used by other organisations against those used by DFID.

B.2.2.1 Other mechanisms used for enhancing the consideration of ethics in evaluation and research

A range of mechanisms are employed to enhance consideration of ethics in evaluation and research at different stages of the evaluation and research process. The type of mechanism varies according to organisational role in the process. Table 1 below highlights some mechanisms cited during this light touch review.

Table 1: Examples of other mechanisms for enhancing consideration of ethics by stage in the evaluation and research process

Commissioning
Binding requirements on contractors: <ul style="list-style-type: none"> • Terms of Reference and Contracts (Children's Investment Fund Foundation – CIFF) • Application forms for research funding (Wellcome Trust, ESRC) • All evaluators sign the Code of Conduct for Evaluators in the United Nations system (WFP, WIPO) • Requirement for Inception reports to elaborate on ethics considerations (UNFPA).
Internal advisory support mechanisms: Include ethics review into the work of existing commissioning review boards (DECC).
Design
Ethics Review Boards: Internal and external private
Protocols for working with children or others with specific needs (Save the Children)
Memorandum of Understanding (MOU) for fieldworkers (Young Lives)
Monitoring
Integrating ethics into annual review processes (CDC)
Commissioners as part of the evaluation team (UNFPA)
Systematic ethics monitoring procedures throughout process (Young Lives)
Ethics escalation processes: 43% of survey respondents considered their organisation had clear mechanisms in place.
Data use, including dissemination and communication
Responsible data management policies (Oxfam, IOM)
Cross-Cutting different phases
Internal advisory boards (IDRC)
Capacity building <ul style="list-style-type: none"> • Staff Induction: 26% of survey respondents said that staff had access to information on ethics during induction. • Checklists: (ESRC, Scottish Government and DECC) • Through evaluation and research societies/ associations (ESRC Conferences) • Professional development, including training. (DECC, IDRC, 3ie, CHAI) • Promoting awareness and opportunities for discussions about research ethics (IDRC) • Issuing a FAQ document to support practice (ESRC)
Leadership: Having an ethics Champion (DECC).

¹⁴ See Resnik 2011.

Annex 4 provides an annotated version of this table, including concrete examples from different organisations.

Section Summary: This section has reviewed practice – both of DFID and that of other organisations. It has shown that there are many mechanisms for enhancing ethical practice and good practices from other organisations that DFID could draw on to revise its Guidance for Ethics in Evaluation and Research.

Overall Section Recommendation: DFID should define and contextualise ethics in international development research and evaluation and clarify and consolidate existing principles. It will be important to enhance communication and use of guidance as well as update and consolidate content for each stage of the evaluation and research process, building on good practices identified as part of this review. As an immediate next step, senior responsible officers should check the ethics practice of suppliers and assess whether appropriate quality assurance mechanisms are in place.

PART C: MOVING FORWARDS TO ADDRESS LIMITATIONS

Part C of this report looks at addressing limitations in:

- Responsibility
- Systematic use of ethics throughout the evaluation and research process
- Responding to specific needs in particular contexts
- Responding to emerging issues.

C.1 Addressing responsibility

Whose responsibility is it to support and monitor ethical practice? DFID's Principles clearly place the burden of responsibility on researchers and evaluators. There is no mention of DFID's own responsibilities, although these are expanded on in the Guidance document.

Of the 25 organisational frameworks reviewed for this report, 4 put the burden of responsibility on suppliers/ lead research organisations (DFID, AES, AEA, ESRC) and 7 stated a shared responsibility (UNEG, UK Evaluation Society (UKES), Portuguese Government, Canadian Evaluation Society, Government Social Research, Scottish Government, and the New Zealand Government Evaluation and Research Unit and the New Zealand Evaluation Association (ANZEA)). The others were not explicit in specifying where responsibility should lie for evaluation and research purposes.

A significant majority of survey respondents considered that ensuring ethics should be a joint responsibility between commissioners and suppliers/lead research organisation. The exception was for: implementation where 80% considered this was the responsibility of the implementer, and; monitoring where 45% considered that it was the responsibility of the implementer and 45% noted it was the responsibility of both.¹⁵

¹⁵While the survey focused on organisations, it is also important to note the responsibility of individual professional, who are the ones who ultimately need to make ethical choices in the field in circumstances that may be changing rapidly. Their responsibility involves using their professional experience and competence to analyse how ethics affect methodological and practical decision making in different types of evaluation and research, ensuring they have the skills required to engage in ethical decision making and are committed to a reflective practice based on an understanding of the conflicting values and principles arising from the multiple

Nearly all interview respondents considered that responsibility should sit across the board, as different stakeholders have different priorities and interpretations of ethical behaviour.

It was noted that responsibility may also need to be driven by the particular circumstances of a piece of research or evaluation:

- Sector: In health, for example, the sector is well regulated and may need less involvement from DFID beyond requiring that due consideration is given or explicitly requiring the service provider to use a recognised standard. However, in other sectors there might be a need for greater DFID monitoring and engagement. At the very least, DFID should require demonstration that ethics have been considered at different stages in the process. This would require relevant staff to have the necessary support in terms of tools and skills development.
- Contractual relationships: If DFID is the sole funder, then it bears greater responsibility for ethical considerations. In other cases it will be important to assess whether partner organisations have adequate frameworks in place.
- Resource allocation: Where inadequate resources have been allocated there is a responsibility on suppliers to clarify the ethical implications. There is also a responsibility on the part of the commissioners to consider these implications, if they failed to do this in advance.

Interviews revealed growing concerns around the omission of **sub-contractors** from some ethics monitoring frameworks and mechanisms. This is particularly an issue as grants and contracts may be sub-contracted outside of the UK where different legal frameworks and protection apply and where ethics review committees may be limited to the health sector. DFID needs to clarify whose standards should apply in these situations and whether this is different in different sectors. So, for example, World Health Organisation standards could be applied globally, but Freedom of Information standards may have localised legal arrangements.

Where responsibility for sub-contractors should lie was asked of survey respondents. Respondents were able to select more than one answer. They answered as follows:

- 60% considered that the Supplier/ Lead research organisation should guarantee that sub-contractors/ partner researchers sign up to an ethics protocol or similar as part of any contract. 45% of these also thought that the Supplier/ Lead research organisation should guarantee they will ensure that sub-contractors have the required skills and knowledge to work to required ethical standards through providing training or other.
- 45% thought that the Supplier/ Lead research organisation should choose the mechanism that they see as most appropriate for ensuring ethical practice amongst sub-contractors. Contracts should not require specification of management of sub-contractors in relation to ethics.

It was noted that there are additional costs of monitoring sub-contractors' adherence to agreed ethical standards and that signing up to a standard does not necessarily lead to adherence. However, this should not absolve organisations of their responsibility for sub-contracting to parties with adequate skills, including competency in applying relevant ethics principles. If sub-contracted parties do not have these, then perhaps there is an

roles they often play (consultant/administrator, a data collector/researcher, a reporter, a member of the evaluation profession, a member of the same professional network as the object of evaluation, and a member of society See Huatori 2010: 119).

obligation to train them. This is the step that has been taken by CHAI for example, who require all those they work with to take the WHO online training.

Recommendations to DFID

DFID has an overall responsibility to provide clearly articulated standards or principles of ethics, to communicate these effectively to those with whom it works and then hold different parties to account for meeting these standards. All this, within a context where the need to balance possibly conflicting ethical issues is understood as part of a process oriented approach.

As part of this DFID will need to:

- Consider and clarify responsibility at different stages of the evaluation and research process. This should include responsibility (contractual or otherwise) for sub-contractors.
- Within DFID, consider including ethics sign off in the responsibilities of the DFID Senior Responsible Owner of a given project (with the accompanying support mechanisms in place in terms of access to advice, tools, capacity, skills development etc.) and;
- Include ethics in the Director of Research's Annual Statement of Assurance.

C.2 Addressing gaps throughout the evaluation and research process

Two important gaps were identified: a) The lack of mechanisms for ethics review in design stages, for those not subject to Ethics Committee Review b) Lack of monitoring throughout the rest of the process.

C.2.1 Design Phase gaps

The most frequently cited mechanism for supporting ethics practice is the Ethics Review Board. While Ethics Review Boards have an essential and valuable role to play, they are not without their limitations: (i) Many sectors, countries and organisations do not have access to them. 39% of survey respondents, for example, did not use an external or internal Ethics Review Board; (ii) These boards may not have expertise in the international development context where some of the assumptions they make may not hold. (iii) Ethics may not always be the Board's primary concern (See Duggan and Bush 2015 and Simons 2006). (iv) Their decisions are not necessarily enforceable. (v) Projects can be re-labelled as consultancy rather than evaluation and may become exempt from human subjects review even though human subjects are involved. (vi) They are usually only relevant in the early stages of the process, often the statement of intention phase.

Recommendation to DFID:

DFID should pay attention to how ethics are considered in the design process. The following are suggestions for how this might be done:

- Reviewing whether and how Ethics Review Boards are relevant to the specific context
- Requiring completion of an ethical research/ evaluation self-assessment form, to be attached to a proposal or inception report (see UNEG and ESRC examples).
- Requiring researchers/ contractors to engage in an early stage assessment of some of the ethical issues of evaluation / research work. This could come under evaluability assessments for example, where the question of whether the work is warranted from an ethics point of view could be addressed. Other opportunities include inception or research protocol development stages.

C.2.2 Gaps post design

Putting responsibility onto the evaluation supplier or the research provider means that DFID does not have a mechanism for monitoring work in real time. This is arguably insufficient from an ethics perspective. The funds are provided by the UK taxpayer and there is an expectation that they will be used for ethical purposes. While some delegation of responsibility is essential, a wholesale farming out of responsibility is not. In Section B, we saw some examples that could be drawn on to improve practice.

Recommendation for DFID:

- Provide guidance on ethics at each stage of the evaluation and research process. The AES guidelines provide a useful template for this.
- Discuss the possibility of pooling resources for an independent review board/ advisory function with others. This could function on an ad hoc basis and be funded by different government departments, such as DECC, and Trusts, such as Wellcome. There was appetite for discussion amongst these bodies.
- Use annual reports to highlight ethics considerations- should DFID consider this to be a resource priority as it would require capacity. Continue to use the independent quality assurance evaluation mechanism (SEQAS) and enhance it with direct reference to DFID's Ethics Principles and Guidance.
- Explore how to incentivise good practice.
- Evaluation and research management groups explicitly create space for a discussion on ethics and require an update as a standard agenda item.
- Provide clarification for staff on remedial actions, and grey areas. For example, whose laws prevail and who provides legal redress in the case of a Tanzanian data collector, contracted by an Indian company, who has been commissioned by DFID in the UK puts an individual in Tanzania at risk through a failure to protect a respondents' privacy?

C.3 On-going issues that require context specific response

During any evaluation or research process, there will be specific values based choices that will need to be made in response to the given context. These will need a detailed exploration that goes beyond general global principles of ethics and related guidance. They may also require access to expert advice.

Different types of research and evaluation and different choices of methods will raise different ethical dilemmas. So, for example, it has been decided that the best type of evaluation for the context is an impact evaluation and the best method is a randomised controlled trial. However, a researcher gathering data in the control group notes a harmful practice in one of the households. Should she raise this, even though it is a pre-existing condition and not under her duty of care? Or should the ethics of working for the greater good require her to not take action and prioritise the experiment? An example was given of a gas servicing engineer, who was a researcher, looking at energy consumption in a control group. She spotted a fault with a gas meter. What was her responsibility?

Different social and logistical contexts will also require context based decision making. For example, the ethics of social justice require you to be inclusive and non-discriminatory in your practice. The ability to facilitate this will depend on gender relations and other inclusion practices locally. Ethical choices will also need to be made about resources, for

example. To be inclusive, you may need to visit an indigenous community an additional day of travel away. You may need an interpreter. Do you prioritise this at the cost of speaking to a larger number of people locally? You are a female researcher, the cultural practice in country is to wear a head scarf? What do you do? You are in a refugee camp and want to talk with GBV survivors who are afraid to leave their houses. Method wise, it makes sense to visit people in their homes but what are the ethical considerations of this choice?

Potential research and evaluation participants will have different specific needs that may impede their access or ability to influence the evaluation or research. Commonly, ethics protocols look at “vulnerability” in order to “do no harm”. This, however, fails to take on the ethical principle of “doing good” as well as those of social justice and rights, which require us to go beyond working on vulnerability to look also at inequality. When we organise our venues, who are we excluding through lack of consideration of inequalities? When we write up our analysis, whose voices dominate? Who has the final say when there are choices about what to include and what to leave out? Who receives the results of our evaluation and research? Who doesn't? Do we re-inforce vulnerability and discrimination through our own approaches by failing to acknowledge the individual's knowledge and agency? Are we prepared to pay for our ethical commitment to social justice and rights or do we exclude them under the pretext of value for money considerations? In terms of research and evaluation with persons with disability, there is a strong focus on sensitive personal data and anonymity, but what about engaging persons with disabilities as evaluators and agents of change? This is something that DFID is currently exploring and is actively promoting under its support to the [Washington Group](#).

Situations of violence, including conflict, will require different ethical choices. How far are you prepared to put an evaluation team at risk? How do you deal with the need for data collection when working in communities experiencing trauma? How do you “do no harm” when even talking to a researcher can put someone at risk? Do you have the expertise to vet proposals, which are not subject to an ethics review board? Where an ethics review board is available, do they have the necessary understanding of the methodological, logistical, and political context within which such work is undertaken? How will political interests be balanced against ethical principles? See Duggan and Bush 2014 and 2015 for an accessible and robust exploration of research ethics in conflict zones.

Recommendation to DFID:

- Consider the provision of support to decision making in specific contexts or an ad hoc pilot bi-lateral or internal review board that comes together where difficult ethics choices are identified e.g. conflict zones, challenging political or cultural environments. It is important to note that there will always be an active process of decision making and no guidance note can apply to all situations.
- DFID should expect consideration of the ethical implications of working in different contexts in Terms of Reference, Inception Reports and Business cases, at the very least.

C.4 Responding to emerging areas: Data management ethics

Responsible data management is an emerging and growing area of concern- not only in terms of method but also in terms of ethics of care, social justice and rights. As noted by commentators: “Data exercises power. It can create it, redistribute it, amplify it or disrupt it. It can entrench and privilege certain actors or perspectives, but it can also empower new voices and approaches. It can reveal and unravel atrocities, but it can also expose the vulnerable and marginalized. Responsible data ethics can often account for the difference between these binaries or polar extremes” ([Antin et al 2015](#): 14). New forms of data use can

also slip through the human subjects' regulations that were developed in a previous era (see [Metcalf 2015](#)).

DFID has a "[Research Open and Enhanced Access Policy](#)". It is not well known, however, among staff and is limited, both in content but also in scope in that it applies only to research.

Externally, there is a proliferation of guidance that DFID can draw on in order to support staff decision making in balancing privacy and data security with open data and aid transparency initiatives. Oxfam is currently developing comprehensive guidance and a team of international development and data experts have produced a useful step by step guide for responsible data management, which includes "future-proofing" against potential changes in political or other situations that can put people at risk. The [Cabinet Office](#), [Information Commissioner's Office](#) and the British Psychological Society have all issued relevant principles and/ or guidelines.

In addition to data security, another ethics question is around whether data collected is actually used for the greater good. A significant proportion of data that is collected is not used. In an international development context, providers of data have an expectation that data they provide will be used to improve lives. It is therefore essential that questions such as: "*Can we find this data elsewhere? Do we really need to ask this particular question and, if so, are we sure we will use the answers?*" are important ethical (and methodological) questions to raise. DFID's current guidance covers this point, clearly stating that "*the value of any research/evaluation being proposed be greater than the burden imposed on participants*" (p.5).

Recommendations to DFID:

- Consider developing guidance on responsible data management to support the Open and Enhanced Access Policy.
- Consider expanding the Policy to cover all areas of data collection, including evaluation and monitoring data.
- Consider requiring suppliers to adhere to the Policy.

Section Summary: This Section has highlighted important gaps in current practice of ethics in international development research and evaluation. It has provided a number of recommendations for DFID and others to consider.

Overall Section Recommendation: DFID would do well to clarify expectations and responsibilities regarding ethics at each stage of the evaluation and research process and its own role in holding different parties to account for meeting these. Guidance on responding to differing contexts (socio-cultural, logistical, insecurity) would be a useful contribution, as would an enhanced response to the ethical challenges relating to responsible data management.

Concluding Thoughts

This light touch review has explored the extent to which and how ethics feature in international development research and evaluation. It has explored definitional issues and placed ethics in the broader context of what constitutes good practice. It has explored DFID's own framework and practice as well as those of other commissioners, donors, and practitioners. It has identified important gaps in practice and provided recommended ways forward. This paper is in no way exhaustive and aims to contribute to collective learning on improving ethical decision making in international development practice.

DFID has an important role to play in providing clearly articulated standards or principles of professional ethics for evaluation and research. Responsibility cannot stop here, however, Principles and guidance need to be communicated effectively and systematically to all staff and to commissioned researchers and evaluators. An enabling environment that allows for discussion around the complex decision making processes required needs to be provided. And, different parties need to be held to account for meeting these standards. Ethics are not a bureaucratic hurdle but part and parcel of everyday good practice that seeks to deliver more relevant and impactful research and evaluation so as to reduce poverty and discrimination.

Annex 1: Rapid analysis of DFID's Ethics Principles for Research and Evaluation

A rapid analysis was conducted of DFID's existing principles. This analysis was informed by:

- findings from interviews, survey and literature conducted for this review
- the criteria for assessing ethical rules and principles proposed by Chalk, Frankle and Chafer (cited in Newman and Brown 1996: 113): Applicability; Clarity; Consistency; Ordering; Coverage and Acceptability.

The overall analysis is that there is some confusion between principles and other research standards and legal requirements. The principles could be revised to avoid duplication, be more internally consistent, and serve as more distinct piece of the broader evaluation and research guidance framework. This will enhance utility and shorten the document.

Principle (summary)	Comment	Suggestion
1. Researchers and evaluators are responsible for identifying the need for and securing any necessary ethics approval for the study they are undertaking.	<ul style="list-style-type: none"> • This takes responsibility away from DFID. • Survey, interviews and literature review called for a system of shared responsibility, with onus varying at different times in the research and evaluation process. • Obtaining ethical approval is not a principle. This falls under "how to" or practical guidance rather than principles. 	<ul style="list-style-type: none"> • Include shared responsibility and clarify who is responsible for what and when. • Include ethics approval under research and evaluation guidance
2. Research and evaluation must be relevant and high quality with clear developmental and practical value	<ul style="list-style-type: none"> • This is an evaluation standard and is primarily about the product. This principle could be met without ethics being respected. 	<ul style="list-style-type: none"> • Remove and cross reference evaluation standards in the guidance document
3. Researchers and evaluators should avoid harm to participants in studies, including those conducting them.	<ul style="list-style-type: none"> • There have been calls to increase this bar, and focus on "doing good" rather than simply "avoiding harm". See inclusion of "beneficence" or "doing good" in (see Academy of Social Scientists, ACFID). Also definitions of ethics provided in this report. 	<ul style="list-style-type: none"> • Increase the bar to include "aim to maximise benefit and minimise harm". Provide guidance on the implications of this for joint evaluations or where DFID has little scope for influence.
4. Participation in research and evaluation should be voluntary and free from external pressure.	<ul style="list-style-type: none"> • The text is limited to participants, rather than being inclusive of practitioners and managers. • Arguably, it also falls under the "how to" of the principle of doing no harm. 	<ul style="list-style-type: none"> • Expand to include evaluators and researchers who should also be free from external pressure. • Expand to note that commissioners also should not exert undue pressure. • Include as guidance under the expanded version of the ethics of care/ avoiding harm principle.
5. Researchers and	<ul style="list-style-type: none"> • This potentially falls under 	<ul style="list-style-type: none"> • Consider inclusion under a

<p>evaluators should ensure confidentiality of information, privacy and anonymity of study participants.</p>	<p>“how to” rather than an overarching ethics principle.</p>	<p>broader ethics of care principle and include detail in guidance.</p>
<p>6. Researchers and evaluators should operate in accordance with international human rights conventions and covenants to which the United Kingdom is a signatory, regardless of local country standards.</p>	<ul style="list-style-type: none"> • This is arguably a legal standard that are part of wider contractual obligations for all commissioned work rather than a principle of ethics for evaluation and research. Ideally, would be included as part of contractual obligations. 	<ul style="list-style-type: none"> • Discuss whether this should be re-phrased or come under a broader ethics of rights and justice header. • Include legal obligations under general contractual conditions
<p>7. DFID funded research and evaluation should respect cultural sensitivities.</p>	<ul style="list-style-type: none"> • This is a one way requirement. It also reads as a “how to” rather than a principle of ethics. 	<ul style="list-style-type: none"> • Re phrase to include cross-cultural and cultural values and dialogue and include under broader rights and justice header. This should also be linked to dilemmas of where cultural norms run counter to universal rights. • Guidance should include information about application of international principles where these may come into conflict with local cultural practices.
<p>8. DFID is committed to publication and communication of all evaluations and research studies.</p>	<ul style="list-style-type: none"> • This is a transparency standard for DFID that arguably cascades down from an ethics principle around integrity 	<ul style="list-style-type: none"> • Consider including under an integrity principle that clarifies the commitment to publication in an accessible format for different stakeholders.
<p>9. Research and evaluation should usually be independent of those implementing an intervention or programme under study.</p>	<ul style="list-style-type: none"> • Independence and Impartiality are evaluation standards, contained in DFID’s Evaluation Policy (also an OECD DAC standard). It is also a methodological choice. Certain evaluation questions, for example, may require democratic, participatory or developmental evaluations for example. It also may not be relevant to research and therefore doesn’t fall under principles that seek to address both research and evaluation activities. 	<ul style="list-style-type: none"> • Remove. This is included under DFID’s evaluation standards (which may need to be revisited to allow for the right methodological approaches to be chosen to answer the specific research/ evaluation questions). Also it could be included under a broader integrity principle.
<p>10. All DFID funded research/ evaluation should have particular emphasis on ensuring participation from women and socially excluded groups.</p>	<ul style="list-style-type: none"> • Phrasing implies that this is a methodological and political requirement as opposed to a principle of ethics centred on doing no harm (i.e. through excluding women and socially excluded group) 	<ul style="list-style-type: none"> • Include explicitly under a broader justice and rights principle. • Differentiate from the scientific/ methodological requirement around representation- also

	<p>or on justice/ rights.</p> <ul style="list-style-type: none"> This would be more coherent spelled out under a broader justice and rights ethics principle. 	<p>important but arguably belongs elsewhere. Consider Aarhus convention around environmental participation.¹⁶</p>
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Annex 2: Summary of Survey Findings

The 17 question survey, administered through Survey Monkey, was sent out to 57 DFID evaluation and research providers. They were asked to forward the survey on to their consortium partners. We do not know how many individuals received the survey request. We do not have access to identifying data, such as ISP addresses, and the only potentially identifying question was organisation type. 50 responses were received but two respondents only answered the first question on type of organisation and are therefore not included in the analysis. Some qualitative responses are included below. Others are detailed in, or have informed, the main body of this report. It is important to note a high dropout rate from the survey when it moved into the qualitative answers component. See below.

Type of organisation: 29 respondents were from the private sector, 9 from a University, 6 from an INGO, 3 were from multi-laterals, 2 were from a government body.

Does your organisation have a standard set of Ethics Principles, Guidelines and/or Code of Practice?

90% of respondents noted that their organisation has a standard set of Ethics principles/ guidelines/Code of conduct that refers to Ethics. 14 of the respondents who answered "yes" their organisation did have a relevant document, did not answer the next question asking for a description of the document. This was a mandatory question and meant that 29% of respondents dropped out of the survey at this point.

Type of document/ practice: Of the 31 respondents, 23 referred to a Code of Conduct or a practice that defines standards of ethical behaviour. 19 noted that their organisation had ethics guidance and 15 that their organisation has a set of ethics principles. Respondents were asked to tick all that applied.

When do staff access this information?: 11 respondents noted that staff systematically use these documents when undertaking each piece of research or evaluation as part of an organisational requirement (7 of these were private sector, 3 from Universities, 1 from INGO). 8 said that staff had access to this information during induction (6 from private sector, 1 from INGO, 1 from multilateral). 3 during recruitment (2 from private sector). 1 University respondent used the documentation on an ad hoc basis when an ethical dilemma arises. 8 noted "other" mechanisms but the detailed response indicated that these were a repetition or combination of the options provided.

Do you use any external ethics guidance?: Of the 28 respondents, 19 said they used external guidance. 9 did not. These included DFID's Ethics Principles, other appropriate guidelines (e.g. WHO, ESOMAR) and AEA standards and guiding principles.

Do you have to get ethical approval for all/any of the research and/or evaluation work that you carry out? 11 respondents stated that they did not have to get ethical approval for research and evaluation work carried out, 8 do, and 9 sometimes do. Two respondents noted that although they have not needed to get ethical approval they ensure that all evaluation inception reports include a statement of how ethical practices will be ensured throughout the evaluation. All University and INGO respondents noted that they did have to get ethical approval. Of the 18 private sector respondents, 10 did not, 2 did and 6 did sometimes.

¹⁶ 1. Right to Information. 2. Right to Participate. 3. Right to a remedy if either of the above are not given. UK is a signatory to this [Convention](#).

Does your organisation have an ethics review body? The majority of respondents have an internal ethics review body (15 out of 28). 2 respondents use an external ethics body, 7 do not have such a body. All University and INGO respondents had a review body available. Of the private sector organisations, 7 did have such a body internally, 2 used an external body and 6 did not have such a body. Of those in the private sector who did not have access to an ethics review body, two noted that they contract internal and external peer reviewers for every project who amongst other things review the ethical considerations of every evaluation. One noted that they engage in informal consultation within their organisation.

Do you think that there are sufficient mechanisms in place to ensure that ethics are not breached? 86% of respondents considered mechanisms were sufficient. 14% did not.

Are there clear ethics escalation processes in place where a breach of ethics does arise or where there is a possible breach that requires investigation?

43% of respondents considered that there are clear processes in place where a possible or actual breach of ethics occurs. 14% thought there weren't and 18% did not know. Examples of escalation processes given include management reviews, internal committees, institutional review board's standard operating procedures, HR team.

Do you think these are sufficient to ensure that remedial action is taken? 85% considered mechanisms are sufficient. 14% considered they are not. One reason given was a lack of competence to ensure "effective" remedial action was taken.

What are the main ethical challenges faced in designing and planning evaluation or research?

Three respondents noted that they had had no ethical challenges. Challenges noted referred to: Conflicts of interest, IRB requirements, including getting approval for ad hoc and qualitative methods, data availability, managing client expectations and pressure to adopt a particular methodology, availability of data, intellectual property, seeking informed consent, methodological design, including cultural appropriateness and ensuring partners appreciate the value of ethical research, resisting donors' tendency to over-research particular countries/programmes/groups and ensure no harm is done.

Main ethical challenges faced in implementation of evaluation or research, including data collection.

Two respondents noted that they had not faced ethical challenges, one noted no substantial challenges. The others noted the following: ensuring safety of staff and participants, testing design choices, responsible data management (internally and externally), availability of data and timely availability of stakeholders, managing expectations of recipients and ensuring, monitoring and quality assuring ethics standards amongst partner organisations involved in data collection, costs required to take time needed to enable ethical practice, conflict of interest, informed consent and privacy, potential conflict with national laws and regulations, cultural sensitivity, interference by the programme implementer, question of provision or not to give incentives.

Main ethical challenges faced in handling products and data from the evaluation or research during dissemination and communication and after completion.

Three respondents noted that they had not faced ethical challenges. Others noted the following challenges: Privacy and protection of identities, data security and archiving, uptake, convincing participants of confidentiality of data, data ownership, authorship and sharing, manipulation of information in the final report, lack of budgeting for local dissemination. A thorough evaluation/ research communication strategy at the beginning of the process was seen as an important risk reduction strategy. Another strategy to manage disagreements over content include noting dissenting client opinions in the evaluation report, or preparing report versions only for internal/classified dissemination.

What are the most challenging ethical dilemmas that you currently face in your practice?

Three respondents noted that they had not faced ethical challenges. Most challenging dilemmas included: Selection of partners (alignment with values), adhering to principles in humanitarian sector, confidentiality of data, managing client expectations, "pressures for rigorous data and counterfactuals not compatible with participant self-selection in projects", matching ethical

standards with reality of field work, consenting and re-consenting issues in longitudinal studies, lack of local ethical clearance committees and expertise, staff security in context where funders absolve themselves of responsibility beyond approval of ethics protocol and insurance coverage, cultural appropriateness, ensuring do no harm and representation principles in challenging contexts, “design that precludes certain groups to act as control (even if they receive grants/assets/support after evaluation)...in some instances this is life and death or very serious outcomes for the household”, ethics issues when a sub-partner in a consortium, training local evaluation team members on short-term evaluations. This latter commentator has developed a new on-line training to mitigate this risk.

Do you have a data storage or data access protocol? 16 respondents have a data storage or data access protocol, 4 do not. Mechanisms included signing confidentiality agreements with implementation partners, keeping confidential folders, using the data safety protocols of the relevant Independent Review Board, using internal data protection principles and policies, having ad hoc mechanisms for different projects. One organisation noted that they use industry-standard security layers, including encrypted data transmissions and that project plans define any specific data security issues and protocols to follow, and this is circulated to all project team members.

There was an optional question on balancing commitments to making raw data publicly available with the protection of respondents’ anonymity. 17 respondents answered this. Only one said that they had shared raw data because they felt that there was more good than harm to come of this. One respondent said that they do share raw data with others- but only with cluster lead agencies but not to the public. One other said they shared cleaned raw data with their sponsor and that this could be accessed through institutional data policy although it wasn't available in the public domain. Others noted that they make available anonymised transcripts. Others noted that they are actively considering this issue or make a point of not sharing primary data.

For different phases of an evaluation or research project, with whom do you think responsibility for ensuring ethics lies?

Overall, the significant majority of respondents considered that ensuring ethics was a joint responsibility between commissioners and suppliers/lead research organisation. The exception was for implementation where 80% considered this was the responsibility of the implementer and monitoring where 45% considered that it was the responsibility of the implementer and 45% noted it was the responsibility of both.

	Supplier/ Lead research organisation	Commissioner/ Funding body	Both.
Planning the evaluation or research	20%	5%	75%
Designing the evaluation or research	40%	-	60%
Implementing the evaluation or research	80%	-	20%
Monitoring/ quality assuring the evaluation or research implementation	45%	10%	45%
Resolving ethical dilemmas that have arisen	30%	5%	65%
Ensuring the ethical handling of products and data from the evaluation or research during dissemination and communication	35%	5%	60%
Ensuring the ethical handling of products and data from the evaluation or research during dissemination and communication after completion	5%	20%	70%

What do you think is the most appropriate way for ensuring ethical practice of sub-contractors/ partner researchers? Respondents ticked more than one option and responded as follows:

60% considered that the Supplier/ Lead research organisation should guarantee that sub-contractors/ partner researchers have signed up to an ethics protocol or such like as part of any contract.

45% thought that the Supplier/ Lead research organisation should guarantee that they will ensure that sub-contractors have the required skills and knowledge to work to required ethical standards through providing training or other.

45% thought that the Supplier/ Lead research organisation should choose the mechanism that they see most appropriate for ensuring ethical practice amongst sub-contractors. Contracts should not require specification of management of sub-contractors in relation to ethics.

It was noted that there are additional costs of monitoring sub-contractors' adherence to agreed ethical standards and that signing up to a standard does not necessarily lead to adherence.

If any, what additional ethical guidance or clarity would you like to see from DFID?

8 respondents answered this question. 2 considered there was no need, 1 noted that DFID already provides a lot of guidance. Requests made were for:

- In country-specific advice. For instance, if DfID has specific policies/procedures in place for dealing with ethical issues in specific locations, we would be happy to receive those.
- A formal ethics review mechanism that is able to stop projects and programmes on ethical grounds, even when it would be politically unpopular for the power elite. Guidelines don't mean anything without (1) a culture that supports them; and (2) mechanisms that support them.
- Indication of what issues they regard as most important to them, and how they wish to resolve them.
- Clarity on guidance and where the responsibility and cost for adhering to any standard clearly features in guidance.
- Clear ethics policy, if one doesn't already exist, clarify DFID's specialized ethics standards for evaluations.

Annex 3: Are ethical considerations sufficiently different for research and evaluation that they warrant separate guidance and monitoring arrangements?

On the whole, and where it exists, ethics guidance tends to be separate for evaluation and for research. DFID is one of the few organisations¹⁷ that has chosen to produce one set of ethics guidance that covers both evaluation and research functions.¹⁸

There are a range of arguments as to whether there should be separate ethics arrangements for research and for evaluation (see also CDI 2015: 2011). For some organisations, certain types of evaluation, such as impact evaluation using RCTs (which stem from experimental research), come under the definition of “research” in that they seek to generate knowledge (Clinton Health Access Initiative 2015). For others, including some DFID staff interviewed, evaluation falls entirely under research, one argument being that it is research that is being applied in an evaluation context. For yet others, the ethical requirements and implications of each differ in some important ways and means that they need to be considered separately (Bloom 2010)¹⁹. One important way in which they differ is in terms of purpose. The primary purpose of evaluation is not to generate knowledge but to elicit and make public the essential value and worth of programmes or policies, so individuals and groups can contribute to informed policy-making and debate (See Simons 2006: 245-6). It is also important to note that research follows different processes to evaluation and is not subject to the same systematic external quality assurance scrutiny as large evaluations.

Blurring the distinction between the ethics that guide evaluation and those that guide research could arguably lead to ethical compromises that may not be appropriate or acceptable and may make evaluation participants particularly vulnerable to unjust or weak ethical practice. For example, a lack of understanding of the political implications of the evaluation process may lead to individuals who are critical of a programme facing recriminations when the programme is closed (for reasons that may have nothing to do with the evaluation itself).

In view of these discussions, if DFID chooses to retain one set of overarching principles and guidance, it might be helpful to include additional considerations that relate to the specificities of purpose and quality assurance systems that underlie each of the different functions²⁰. The overarching principles could then be expanded to cover other relevant areas, for example data collection during programme implementation.

¹⁷ The Australian Council for International Development has also drawn up Principles for Ethical Evaluation and Research in International Development (2013).

¹⁸ This contrasts with other DFID approaches where guidance is separate e.g. Evaluation policy and DFID Research Open and Enhanced Access Policy.

¹⁹ See also Duggan and Bush who refer to the fact that evaluations aren't always subject to ethics review mechanisms similar to those that oversee university based research and there is a client-patron relationship in evaluation that is not so clear cut in research (2015: 27). Another difference is that evaluation, unlike research, is designed to influence policy and practice at a given and immediate moment in time. Research usually works to a longer time frame.

²⁰ A diagram showing evaluation and research as a continuum but with very different purposes at the extremes is one suggestion that was made.

Annex 4: Examples of other mechanisms for enhancing consideration of ethics by stage in the evaluation and research process

Commissioning	
Binding requirements on contractors	<ul style="list-style-type: none"> • Terms of Reference and Contracts: Children's Investment Fund Foundation, for example, requires a statement about a bidder's policy and approach to human subjects. Contracts include a standard clause that requires compliance with a list of ethical principles. WIPO require a signed agreement to abide by the Code of Conduct. One commissioning body withhold final payment unless all data has been made public in an anonymised form as per their agreement with the supplier. • Application forms for research funding: Wellcome Trust requires applicants to self - declare in relation to a list of ethical requirements. ESRC applicants are required to provide information on ethical considerations. • All evaluators sign the Code of Conduct for Evaluators in the United Nations system (WFP, WIPO) • Requirement for Inception reports to elaborate on ethics considerations e.g. UNFPA
Internal advisory support mechanisms	<ul style="list-style-type: none"> • Include ethics review into the work of existing review boards. For example, the UK Department of Energy & Climate Change (DECC) has a Commissioned Evidence Panel, which brings together Heads of profession on a monthly basis to review business cases. Ethics review has been added to their functions.
Design	
Ethics Review Boards	<ul style="list-style-type: none"> • Formal, institutionalised operating mechanisms for ethics review. These are often found in Universities, where they are used particularly for "human subjects review". While there are an increasing amount in countries in the South, these appear to be predominantly health related. There are some private companies that provide independent services, but these appear to also be predominantly health based.
Protocols	<ul style="list-style-type: none"> • Some evaluators and researchers use protocols designed to protect children from abuse of their rights through awareness, prevention, reporting and responding (e.g. Save the Children 2003).
Memorandum of Understanding (MOU) for fieldworkers	<ul style="list-style-type: none"> • Developed in collaboration with research teams, setting out basic guidance about research procedures and respectful communication with research participants (see www.younglives.org.uk).
Monitoring	
Integrating ethics into annual review processes	<ul style="list-style-type: none"> • e.g. Centers for Disease Control and Prevention (CDC).
Commissioners are part of the evaluation team	<ul style="list-style-type: none"> • UNFPA gave examples of raising issues of unethical behaviour as they arise, check interview log books, and monitoring interpreters and data collectors, where possible.
Systematic ethics monitoring throughout process:	<ul style="list-style-type: none"> • Young Lives research programme have strict ethics monitoring. Ethical dilemmas are systematically recorded by researchers. Fieldworkers are required to report any cases that give cause for concern to their supervisors, who will try to resolve the situation. Supervisors also bring questions to the attention of the lead researchers, who discuss what to do.
Ethics escalation processes.	<ul style="list-style-type: none"> • 43% of survey respondents considered that their organisation had clear mechanisms in place where a possible or actual breach of ethics occurs. The remainder did not have these or did not know if they have these. 85% of respondents considered that there were sufficient mechanisms in place to take remedial action. The others did not. The question that remains unanswered is whether complainants would feel that these mechanisms are sufficient.

Data use, including dissemination and communication	
Responsible data use	<ul style="list-style-type: none"> • Data protection principles. 16 out of 20 survey respondents have a data storage or data access protocol. IOM have a set of Data Protection Principles. • Oxfam's Responsible Program Data Policy and forthcoming guidance provides a set of principles for data management. While these are not strictly related to evaluation and research per se, they are a useful reference document.
Cross-Cutting different phases	
Internal advisory boards	<ul style="list-style-type: none"> • For example, IDRC has an internal advisory body that assumes an advisory function on issues of research ethics related to the research conducted or supported by the organisation. It provides non-binding advice and guidance to staff to help ensure that research complies with the IDRC Corporate Principles on Research Ethics and Ethics Guidelines.
Capacity building	<ul style="list-style-type: none"> • Staff Induction: 26% of survey respondents said that staff had access to information on ethics during induction. • Checklists: The ESRC, Scottish Government and DECC, for example, have developed ethics sensitivity checklists. • Evaluation and research societies/ associations provide capacity building support to professional members e.g. through inclusion of ethics in conference papers (UKES). • Professional development, including training. DECC, IDRC, 3ie, CHAI all referred to the importance of building staff capacity in terms of ethics- through ensuring that staff, including, data collectors complete the WHO online course (CHAI), holding conferences and senior management retreats on the topic of ethics (3ie) and providing staff with access to external training (DECC). IDRC staff have a mandatory on-line training module on research Ethics. • Promoting awareness and opportunities for discussions about research ethics: IDRC have organised workshops, brown bag lectures. • Issuing a FAQ document to support practice e.g. ESRC.
Leadership	<ul style="list-style-type: none"> • Having an ethics Champion e.g. DECC.

Annex 5: Comparison of DFID principles and those of other organisations

DFID Principle (summary)	Other organisations
<p>1. Responsibility i.e. Researchers and evaluators are responsible for identifying the need for and securing any necessary ethics approval for the study they are undertaking.</p>	<ul style="list-style-type: none"> • In line with AES, AEA, ESRC who place burden on researchers and evaluators. Note: these organisations are targeted at evaluators and researchers. • Guidance issued by UNEG, Portuguese government, UKES, GSR, Scottish Government, New Zealand Social Policy Evaluation and Research Unit (Govt) and Evaluation Association all refer to shared responsibility, with onus varying at different times in the research and evaluation process.
<p>2. Research and evaluation must be relevant and high quality with clear developmental and practical value</p>	<ul style="list-style-type: none"> • Utility is also pulled out by ESRC and the New Zealand guidance. As noted, however, this is an evaluation standard which could be met without ethics being respected. • Quality is picked up (with different terms used, e.g. accuracy, reliability, sound application of research methods) by UNEG, AES, AEA, GSR, Scottish government, and New Zealand guidance. • Competence is pulled out by UNEG, Portuguese govt and the UK, Canadian and American evaluation associations. AES for example, note that “Members should remain competent and rigorous in their practice of evaluation, fairly representing their competence and experience to others, and striving to keep abreast of current and emerging practices” and that “Members should undertake their evaluation work in accordance with the highest standards of evaluation practice.”
<p>3. Avoidance of harm</p>	<ul style="list-style-type: none"> • Referred to directly by UNEG, Portuguese and Dutch governments, ESRC, GSR and Scottish Govt. • Principle expanded to include obligations to participants, including justice, human rights, respect, diversity, cultural sensitivity by UNEG, Portuguese, Dutch governments, IDRC, UKES, GSR, Scottish Government, New Zealand Social Policy Evaluation and Research Unit (Govt) and Evaluation Association. Also by DFID under principles 4, 5, 6, 7, • ACFID have 4 principles: three of which are “Respect for persons”, “Justice” and “Beneficence” (the fourth is about research and evaluation merit”). • UNDP refers to “due consideration of welfare of those involved in the evaluation, as well as those affected by its findings”.
<p>4. Participation in research and evaluation should be voluntary and free from external pressure.</p>	<ul style="list-style-type: none"> • See under 3. above for reference to obligations to participants. • One of the five principles for research by the Scottish government is “Participation based on valid informed consent”
<p>5. Researchers and evaluators should ensure confidentiality of information, privacy and anonymity of study participants.</p>	<ul style="list-style-type: none"> • Referred to directly by UNEG Dutch, UNDP, UKES, AES, ESRC, GSR, Scottish Govt. • The draft UNDP policy refers to” respect the right of institutions and individuals to provide information in confidence and ensure that sensitive data cannot be traced to their source, while ensuring that specific evaluation findings are triangulated so as to avoid being based solely on evidence that cannot be disclosed or verified.”
<p>6. Researchers and evaluators should operate in accordance with international human rights conventions and covenants</p>	<ul style="list-style-type: none"> • See under 3. above for reference to obligations to participants, including meeting their human rights. • The Portuguese government refers to universal values.

to which the United Kingdom is a signatory, regardless of local country standards.	
7. DFID funded research and evaluation should respect cultural sensitivities.	<ul style="list-style-type: none"> • See under 3. above for reference to obligations to participants, including meeting their human rights. • UNEG Norm 11 on evaluation ethics notes "Evaluations must be sensitive to the beliefs and customs of local social and cultural environments" also UNEG standard 2.5 on ethics.
8. DFID is committed to publication and communication of all evaluations and research studies.	<ul style="list-style-type: none"> • For many this came under a broader transparency standard- UNEG, Portuguese government, UKES, ESRC. • Specific mention of appropriate dissemination and utilisation of findings was mentioned by UKES, AES, AEA, GSR and Scottish Govt. AES principles, for example, note "Many if not most evaluations will have multiple audiences, and the needs of each should be taken into account."
9. Research and evaluation should usually be independent of those implementing an intervention or programme under study.	<ul style="list-style-type: none"> • Independence/ impartiality referred to by UNEG as an ethics standard, and detailed in ethics guidance but included as a distinct evaluation norm. ADB, as an OECD DAC evaluation standard (not under ethics), Japan and ESRC.
10. All DFID funded research/ evaluation should have particular emphasis on ensuring participation from women and socially excluded groups.	<ul style="list-style-type: none"> • Dutch government and UNDP raised these issues for specific attention. UNEG norm on ethics notes that "In line with the Universal Declaration of Human Rights, evaluators must be sensitive to and address issues of discrimination and gender inequality."
Not included by DFID	<ul style="list-style-type: none"> • Honesty and Integrity was raised by UNEG (norm, standard and guidance), OECD DAC, Portuguese government and by the UK, Canadian, American and Australasian evaluation associations, ACFID (Australian Peak organisation) and UNDP. AES, for example, have as a principle that "Members should practice with honesty, sensitivity and fairness. Members should not knowingly make or prepare or certify as true any oral or written statement which is false, incorrect, misleading or incomplete." • Accountability raised by UNEG and the American and Canadian evaluation society. AES principle 8 notes "Evaluators should be accountable for their performance and their product" • Principles of ethical data management: Information Commissioner's Office and Cabinet Office.

Selected examples of different components of interesting practice that DFID may wish to consider

Organising principles and guidance in one document by evaluation/ research stage	See AES, ACFID.
Provision of a checklist, flowchart and FAQ	ESRC See also DECC and Scottish Govt
Clear justification for relevance of ethics to international development evaluation and research	ACFID
Obligations of Evaluation/ Research Managers and Commissioners	UNEG for evaluation. Also GSR for research.
Internal ethics review mechanism	IDRC, DECC
Data management	Step by step guidance (under development) on data management Oxfam

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Annex 8: Terms of Reference: Review of Ethics Principles in Evaluation and Research and updating DFID's Ethics Guidance

Introduction: DFID is seeking a contractor to undertake a brief analysis to identify current ethical principles and guidance currently used in and governing international development evaluation and research globally. The review should look at major donors and funders of international development evaluation as well as a select number of key research commissioners (for examples Research Councils in the UK) and professional evaluation associations. This light review should then inform a revision of DFID's Ethics Principles for evaluation and research and provide guidance for staff who commission and manage evaluations and research and suppliers of evaluation and research to DFID.

The main purpose of the work is to draw on existing global practice and to provide advice to DFID, other donors and suppliers on how to ensure development evaluations and research are designed, commissioned, conducted and published ethically.

Audiences: The audiences for the report are DFID advisers, global policy makers and other stakeholders involved in commissioning, managing and implementing evaluations in development and beyond. Study findings and recommendations must be presented in a way that is accessible for both technical and non-technical audiences.

Objectives and Scope: The contractor is expected to deliver a short **Report** (indicative maximum length of 10 pages, excluding annexes) that should provide an overview of:

1. How ethics in evaluation and research are governed by other international organisations working in development (the list of organisations to be agreed in advance);
2. Summary of the key Ethics Principles, Guidelines and Codes of Practice used to govern evaluations and research by other development evaluation funders and professional bodies.
3. any gaps and limitations identified as part of the process.

The contractor should draw on existing literature and practices of donors, research funders and professional associations. Building on the above, an **Ethics Guidance Note** for staff commissioning evaluations and research should be structured around three stages of evaluation:

- a.) Planning and designing ethical evaluation and research;
- b.) Managing and implementing ethical evaluation and research
- c.) Ensuring ethical handling of data and products of evaluation and research.

The contractor is expected to work together closely with DFID's Ethics and Evaluation group, and the Heads of Profession for Evaluation who will provide the necessary data and information as required.

Methods: The analysis and conclusions contained in the review report and the guidance document should be based on the following:

- Desk review of evaluation and research ethics principles and guidance documents that have been completed to date (to be agreed in advance, recognising that not all organisations that are contacted will respond);
- Small number of key informant interviews with key staff and experts with knowledge and experience in international development evaluation and research ethics, and staff who commission international evaluation and research programmes.
- Collecting further views on global ethics procedures and practice through an online tool from a purposive sample that includes:
 - DFID's GEFA suppliers;
 - a range of evaluators,
 - a range of research commissioner and research institutions (including Southern-based).

Deliverables and outputs: The following deliverables and outputs are expected as part of the project:

- A work plan that includes (**within 1 week of start date and subject to DFID providing an initial list of contact details for interviewees and holding an inception meeting upon contract start**):
 - agreed timelines and tasks for the full work
 - agreed list of organisations to be contacted for the initial light review and individuals to be interviewed;
 - agreed questions to be asked of organisations and interviewees;
 - agreed questions for DFID's GEFA suppliers.
 - agreed plan for the dissemination and communication for the report.
- Draft Final Review Report – **To be completed by 21st December**;
- Final report, responding to comments and incorporating revisions to the draft final report – Comments from DFID anticipated by **13 January. To be completed within one week of receipt of comments from DFID**;
- Draft Ethics Guidance Note for staff commissioning development evaluations and suppliers undertaking evaluations – **To be completed by 29th January**
- Final Ethics Guidance Note, taking on board suggestions and revisions to the draft final report – Comments from DFID anticipated by **12 February. To be completed within one week of receipt of comments from DFID**
- Presentation of the report to DFID and/or external audiences and participation in any pre-agreed dissemination/communication events. - **Dates and formats to be agreed by contractor and EVD contract manager.**
- A FAQ document that can be used by DFID advisers, other donors and suppliers for addressing ethical questions at the different stages of evaluation and research.

Skills Required: Key competencies for the contractor are: general knowledge of international development evaluation practice, ethics in research and evaluation; beneficiary feedback; ethical issues in qualitative and quantitative methods; ethics relating to various stakeholder groups (e.g. children); access to a network of evaluation specialists, researchers and professional evaluation associations ; and links with donors and other organisations (e.g. think tanks) active in the field of international development evaluation.

The conduct of this study and its outputs need to reflect DFID's commitments to Gender and Inclusion.

Timing of the study: Expected start date is 24 November, 2015 - Expected Final Report is end of February 2016

- The project should take a maximum of 24 days and should be completed by end February 2016.
 - The draft **Report** should be shared with DFID by 21st December, and the final version within one week of receipt of comments from DFID.
 - The draft revised **Principles** and draft **Guidance Document** should be shared with DFID by 29th January, and the final version by within one week of receipt of comments from DFID.
- The project contractor is expected to manage their inputs but an indicative project timetable is given below:

- 1 day for inception and Work Plan
- 5 days of meetings and interviews with DFID and other bi-lateral and multilateral organisations;
- Up to 5 days of developing and undertaking an electronic supplier survey
- Up to 5 days of reviewing documents and developing findings and checking results
- 7 days of writing the Report (3 days) and Guidance (4 days) (including interim discussions with DFID).
- 1 day of dissemination and communication activities.

Structure of the Report and Guidance Note

The Report should comprise the following sections:

- Executive Summary
- Introduction;
- Summary of findings;
- Identification of gaps;
- Recommendations for areas for evaluation commissioners and suppliers including DFID to consider.

The structure of the Guidance Note will be agreed with the contractor based on the findings of the light Review, but is expected to comprise the following:

- Planning and designing an ethical evaluation
- Managing an ethical evaluation (issues that arise during implementation);
- Ensuring products and data from the evaluation are handled ethically.

Contractual issues

The project is contracted by DFID and is accountable to DFID. The contractor will report to the DFID contract manager: Head of Profession (Job share) Anna Henttinen (a-henttinen@dfid.gov.uk), and Helen Nelson (h-nelson@dfid.gov.uk), and liaise with Marion Tierney (M-Tierney@dfid.gov.uk) in the first instance on all contractual issues. The report should credit DFID for its contribution to the project. DFID will provide a logo for use in the report.