

Processes and indicators for measuring the impact of equality bodies

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E Equinet
European network
of equality bodies

Processes and indicators for measuring the impact of equality bodies is a paper commissioned and published by Equinet, the European Network of Equality Bodies.

Equinet brings together 38 organisations from 31 European countries which are empowered to counteract discrimination as national equality bodies across the range of grounds including age, disability, gender, race or ethnic origin, religion or belief, and sexual orientation. Equinet works to enable these bodies to achieve and exercise their full potential by sustaining and developing a network and a platform at European level.

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1. INTRODUCTION

This paper on processes and indicators for measuring the impact of equality bodies and their work has been commissioned by Equinet. Equinet is the European network of equality bodies and comprises thirty eight member equality bodies in thirty one different jurisdictions. Equinet works to enable national equality bodies to achieve and exercise their full potential by sustaining and developing a platform at European level.

The primary purpose of this paper is to:

- Devise and recommend practical processes and indicators that equality bodies could use to measure the impact of their work at national level.
- Support national equality bodies in the further development of systems of evaluation of the impact of their work.

The paper has been prepared with the broader aim of contributing to:

- Supporting national equality bodies to improve their work and effectiveness.
- Strengthening the capacity of equality bodies to effectively promote and communicate their potential and impact.
- Creating a context of wider recognition for the potential and contribution of equality bodies.

The starting point in preparing this paper was a review of literature on the evaluation of equality bodies and/or national human rights institutions. The results of this literature review are set out in section 2.0 of this paper.

The core input for this paper came from the equality bodies themselves. The first step in gathering this input was a survey of all thirty eight Equinet members. Twenty eight equality bodies in twenty six jurisdictions responded to the survey. The second step was a more in-depth interview with key personnel involved in the evaluation of equality bodies that had done more substantial work in this regard. Nine such interviews were conducted in nine jurisdictions. The results of this input from the equality bodies are set out in section 3.0 of this paper.

Section 4.0 of this paper sets out the processes and indicators that could usefully be implemented by equality bodies in measuring the impact of their work. This draws on the literature review and the equality body input described above. It has been further informed by two debates within the Board of Equinet on this topic.

The reference documentation used in the preparation of this paper is set out in section 5.0.

2. THE LITERATURE

There is limited literature available specifically on the evaluation of equality bodies and national human rights institutions. The literature that is available is almost exclusively focused on national human rights institutions.

This situation reflects the low levels of evaluation done on equality bodies and national human rights institutions. The International Council on Human Rights Policy identifies in its work “a general weakness in most of the institutions studied was a failure to evaluate their own performance beyond the publication of an annual report”¹. They also point to a tendency to focus on standards for national human rights institutions over a focus on their performance and operational effectiveness.

A study commissioned by the European Commission² finds that the same situation pertains for equality bodies. It found that “it is clear from the country fiches that little work has been done to develop and implement appropriate methods to assess the impact of equality bodies”.

There is, however, growing pressure on equality bodies and national human rights institutions to evaluate their work. This is no longer seen as a matter of choice with evaluation needed to motivate supporters, set priorities for the organisation, establish the scope of the issues to be addressed, be accountable and assess impact³.

2.1 Indicators

Indicators can be quantitative, based on numerical information, or qualitative, based on standardised perceptions or qualified assessments⁴.

A framework of human rights indicators developed by the UN Office of the High Commissioner for Human Rights is based on a type of logical chain starting with commitment, focusing on effort, and assessing results⁵. This involves:

- Structural indicators that measure acceptance of human rights standards and commitment to realise human rights.
- Process indicators that identify specific measures undertaken to realise human rights.
- Outcome indicators that measure the results of these measures and the enjoyment of human rights.

A similar logical chain in relation to the work of equality bodies has also been identified⁶:

¹ Performance and Legitimacy: National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2004; page 107.

² Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 136.

³ Raine, Fernande. The Measurement Challenge in Human Rights, International Journal on Human Rights, 4 (3), 2006.

⁴ Dibbets A., Sano H., & Zwamborn M., Indicators in the field of democracy and human rights: mapping of existing approaches and proposals in view of SIDA's policy, Human European Consultancy & Danish Institute for Human Rights, 2010; page 12.

⁵ Human Rights Indicators: A Guide to Measurement and Implementation, United Nations Human Rights Office of the High Commissioner, 2012; pages 30-41.

⁶ Harvey B. & Walsh K., Downgrading Equality and Human Rights: Assessing the impact, Equality & Rights Alliance, Ireland, 2010; pages 104-105.

- Input indicators: The human and financial resources available to and committed by the equality body.
- Output indicators: The work done and the products generated by the equality body.
- Impact indicators: The outcomes achieved by the equality body.

As with the framework of human rights indicators developed by the OCHCR and set out above, each level in this logical chain points to and creates the conditions for the next level. The International Council on Human Rights Policy points out that National Human Rights Institutions tend to measure outputs rather than performance or impact⁷.

Another similarly layered and interconnected framework that has been developed for assessing civil society has four different levels⁸. These are:

- Structure indicators that establish the breadth, diversity, spread and resources of civil society.
- Environment indicators that establish the political, socio-economic and cultural context for civil society.
- Values indicators that establish the values practiced and promoted by civil society.
- Impact indicators that establish the capacity to influence public policy, hold the state and private corporations accountable, respond to social interests, empower citizens and meet societal needs.

A number of key terms are usefully identified, distinguished and clarified in the literature. These terms cover the various items that can accompany indicators and include:

- Benchmarks: A benchmark is a reference point against which performance or achievements can be assessed⁹.
- Targets: A target is a standard of planned performance. It identifies the desired result over a period of time¹⁰.
- Checklist: A checklist consists of both quantitative and qualitative indicators formulated into a set of questions or statements¹¹.
- Ranking: Ranking is a method where measurement results are compared and ranked according to a standardised scale¹².

The links between these different elements are noted and the flaws that result from a focus on indicators without some of these ancillary elements has been pointed out. The use of indicators

⁷ Assessing the Effectiveness of National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2005; page 29.

⁸ Civicus Civil Society Index, 2009 - <http://www.civicus.org/csi>

⁹ Dibbets A., Sano H., & Zwamborn M., Indicators in the field of democracy and human rights: mapping of existing approaches and proposals in view of SIDA's policy, Human European Consultancy & Danish Institute for Human Rights, 2010; pages 12-13.

¹⁰ Dibbets A., Sano H., & Zwamborn M., Indicators in the field of democracy and human rights: mapping of existing approaches and proposals in view of SIDA's policy, Human European Consultancy & Danish Institute for Human Rights, 2010; pages 12-13

¹¹ Dibbets A., Sano H., & Zwamborn M., Indicators in the field of democracy and human rights: mapping of existing approaches and proposals in view of SIDA's policy, Human European Consultancy & Danish Institute for Human Rights, 2010; pages 12-13.

¹² Dibbets A., Sano H., & Zwamborn M., Indicators in the field of democracy and human rights: mapping of existing approaches and proposals in view of SIDA's policy, Human European Consultancy & Danish Institute for Human Rights, 2010; pages 12-13.

without targets is seen in one instance as less than useful¹³. In another, the lack of indicators and targets for impact being developed and measured by equality bodies is highlighted¹⁴.

The International Council on Human Rights Policy has defined benchmarks and indicators in a more specific manner related to national human rights institutions¹⁵. Benchmarks are defined as a range of standards that define the minimum attributes of national institutions. These are divided into standards that concern the character of the institution, its mandate and its accountability. Indicators are defined as tools that measure the national human rights institution's performance in relation to their objectives, benchmarks and relative to other matters.

2.2 Issues

There are issues with evaluation that need to be considered. The requirements to demonstrate impact through evaluation can re-shape the priorities and practices of organisations. The demands of evaluation techniques can re-shape the culture and processes of organisations.

A number of these issues were identified in a workshop hosted by the International Council on Human Rights Policy¹⁶. Evaluation and the imperative to evaluate can exercise significant and inappropriate pressure on what human rights work gets prioritised and how it is pursued.

The workshop report suggests, "human rights work is being driven into what is measurable instead of what matters" and, "advocates and organisations are justifying themselves not in terms of being part of a social movement but of trying to achieve specific goals that are demonstrably measurement friendly"¹⁷. As a result there is a tendency for human rights work to operate within micro frames that are less risky but have a higher probability of success.

The same report further suggests that some of the methodologies including results based management¹⁸ and similar log frame systems¹⁹ lead "over time to the increasing entrenchment of potentially technocratic approaches which seem to shape what organisations are, not just aspects of their work"²⁰.

The inflexibilities that can be a result of results based management are also raised as a matter of concern. The focus that results is "entirely on measuring outcomes or impacts against goals that were stated at the outset" and this lowers "sensitivity to processes, changes and outcomes that were not envisaged"²¹.

¹³ Harvey B. & Walsh K., Downgrading Equality and Human Rights: Assessing the impact, Equality & Rights Alliance, Ireland, 2010; page 74.

¹⁴ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 136.

¹⁵ Assessing the Effectiveness of National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2005; page 9.

¹⁶ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012.

¹⁷ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; page 4.

¹⁸ Results Based Management is based on setting strategic goals as a focus for action; establishing expected results which contribute to these goals; aligning work programmes, processes and resources with these goals; and monitoring and assessing performance against the expected results.

¹⁹ Log frame systems are management tools used in the design, monitoring and evaluation of projects. They are based on a matrix table with, for example, elements such as activities, outputs purpose and goals along one axis and elements such as description, indicators, means of verification and assumptions along the other axis.

²⁰ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; page 3.

²¹ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012, page 3.

The workshop report points out that the outcomes from human rights work might include not only change but also the prevention of change. It might be important to invest resources in challenging human rights areas where it is known that results might not be achievable. A valid goal for human rights work, it is suggested, might just be that of keeping the fire burning, making the claim in steadily more assertive ways. There is a danger that results based management might preclude such work²².

2.3 Pitfalls

There are pitfalls in evaluation that need to be identified and addressed if it is to be meaningful.

The study on equality bodies commissioned by the European Commission highlights the difficulty in establishing causality between impacts identified and the actions of the equality body²³. “It would be difficult to establish direct causality between the work of the equality bodies and levels of discrimination, under-reporting, and equality. There are a broad range of societal and global factors that can and do influence the scale and nature of these issues”.

The same study points to data deficits and the resulting lack of benchmarks as a barrier to effective evaluation. It found that “Limited data has been gathered to establish baselines against which to measure impact”²⁴.

There is tendency apparent in the evaluation of human rights work to focus on the micro level or the individual project. This limits any assessment of the overall effectiveness and impact of the programme of work being done by the organisation. The International Council on Human Rights Policy has noted that the most common indicator used by national human rights institutions is their success in handling complaints but that indicators that rely solely on complaints cannot assess impact on resolving human rights problems in a systemic manner²⁵.

There is a complexity to the evaluation of human rights work given the broad range of different types of interventions that can be involved. The International Council on Human Rights Policy points up the different ways that national human rights institutions intervene – from auditing laws and training public officials, to educating the public, monitoring the human rights situation and handling complaints. It points to the broad range of issues that these institutions are likely to be involved in. It suggests that each type of intervention requires its own evaluation methods and that indicators need to be developed, understood and interpreted with judgment. No single set of indicators will provide information that is relevant and useful to every case²⁶.

²² No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; page 8.

²³ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut fur Menschenrechte (BIM), European Commission, 2010; page 126.

²⁴ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut fur Menschenrechte (BIM), European Commission, 2010; page 136.

²⁵ Performance and Legitimacy: National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2004; page 122.

²⁶ Assessing the Effectiveness of National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2005; page 39.

2.4 Purpose

Evaluating the impact of equality bodies can have a range of different purposes. It is important to establish the purpose of evaluation at an early point so that the approach developed and methods deployed can serve the particular purpose set for the evaluation.

The International Council on Human Rights Policy has set out a number of roles for indicators and evaluation²⁷. These include:

- Helping national human rights institutions gather information about their own organisation and its programmes and to assess what is working well.
- Clarifying planning processes and helping to set targets for future work.
- Enabling communication with the public so that national human rights institutions can communicate their objectives and achievements.
- Strengthening consultation and collaboration with all stakeholders where the indicators are developed through a participatory process.

The report of a workshop hosted by the International Council on Human Rights Policy points to the need for Governmental donors to demonstrate that public money is being spent effectively as another purpose for the evaluation of human rights work²⁸.

Learning for the organisation evaluated is identified in this workshop report as another purpose for evaluation. Evaluation is seen as being about learning opportunities and spaces. In this regard there can be a contradiction where the most interesting learning opportunities are farmed out to an external consultant. Their work highlights that embedding learning requires a shift from a focus on evaluation or audit to evaluative thinking and points to the importance in this of being able to engage honestly with failure²⁹.

In a survey of British charities³⁰ New Philanthropy Capital found that 75% of charities say they measure the results of some or all of their work. Smaller charities were less likely to do so. Funder requirements were seen as a critical driver. Leadership was found to be a strong driver in larger organisations. The benefits of measuring impact were identified as improved services, greater ability to demonstrate results, improved targeting of those assisted, improved allocation of resources, and improved internal strategy, policies and practices.

2.5 Approaches

The International Council on Human Rights Policy highlights that the effectiveness of national human rights institutions need to be measured in terms of their transformative effect on the broader society and in particular how fair they are able to influence the behaviour of officials³¹. They emphasise

²⁷ Assessing the Effectiveness of National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2005; pages 41-42.

²⁸ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; page 4.

²⁹ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; page 13.

³⁰ Ni Ogain E., Lumley T. & Pritchard D., Making an Impact: Impact measurement among charities and social enterprises in the UK, New Philanthropy Capital, London, October 2012.

³¹ Performance and Legitimacy: National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2004; page 105.

the value in assessing the social legitimacy of the body, the public perceptions of the national human rights institution and of what it does.

The work of the International Council on Human Rights Policy suggests the need to shift the frames of evaluation³². In particular it suggests shifting the focus from individual projects to a wider portfolio of actions over a reasonable length of time. It suggests the measurement of intermediate or proxy outcomes rather than impacts. This would include, for example, a focus on outputs and influence in shaping key policies, rights and freedoms. Only service delivery, it is suggested, is readily measured in terms of impact.

The International Council on Human Rights Policy point to a relevant challenge where national human rights institutions have a mandate that goes beyond human rights to include issues of administrative justice or to involve ombudsman functions³³. Evaluation needs to be interested in how effectively these different functions might be combined.

The study of equality bodies commissioned by the European Commission poses equality bodies as also having transformative potential and identifies them as “necessary and valuable institutions for social change”³⁴.

The study grapples with the challenge of exploring the impact of equality bodies in a context where causality, linking the work of the equality bodies to desired outcomes, is at issue. This is addressed by isolating “a number of factors that equality bodies can more visibly impact on and that have an influence on the scale and nature of discrimination, under-reporting and equality in society”³⁵. It identifies five such factors:

- Change in the situation and experience of individuals who experience discrimination.
- Change in the policies, procedures and practices of organisations that provide employment and services.
- Change in the content of policy and legislation and in the process of preparing policy and legislation.
- Change in the wider framework of stakeholders that are working on issues of discrimination, under-reporting and equality.
- Change in public attitudes towards compliance, rights and equality.

The study emphasised the importance of a strategic plan to enable the equality body to undertake a strategic mix of activities from within its repertoire of functions and powers³⁶.

New Philanthropy Capital in Great Britain points to the importance of planning models in helping charities map how their activities lead to their intended outcomes and aims³⁷. Planning models help

³² No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; page 11.

³³ Performance and Legitimacy: National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2004; page 67 and page 76.

³⁴ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut fur Menschenrechte (BIM), European Commission, 2010; page 12.

³⁵ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut fur Menschenrechte (BIM), European Commission, 2010 page 126.

³⁶ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut fur Menschenrechte (BIM), European Commission, 2010; page 11.

charities establish a framework for purposeful impact measurement. In their survey of British charities they found that most charities do not use any planning models³⁸. 7% use a theory of change model. This is defined as a “causal model of how inputs and activities lead to outputs to outcomes to impact, including assumptions and evidence”.

A theory of change³⁹ is based on identifying the change an organisation is seeking and analysing how this change happens. A theory of change establishes the path from organisational activities to outcomes to impact. It helps an organisation to focus on the goals for their work, shows the causal links between different aspects of their work, reveals hidden assumptions made in their work, builds their work on evidence, and uses the views of stakeholders. A theory of change helps organisations understand how outcomes from their work are connected. In a context where progress in an area such as social change is slow, a theory of change can assist in demonstrating where progress is being made towards the goal set.

A theory of change approach involves an organisation in:

- Setting a realistic and definite goal, then;
- Working back from this goal to identify intermediate outcomes required. What has to happen for this goal to be achieved?, then;
- Establishing the links between outcomes, and their order, by exploring cause and effects, and then;
- Working out which activities lead to which outcomes.

2.6 Methods

The International Council on Human Rights Policy highlight that evaluation has an ongoing element and a post facto element. They set out a number of principles that underlie best practice. Monitoring and evaluation need to be:

- Built in at design stage.
- Consistent with the values of the organisation.
- Viewed as a learning tool and a knowledge building exercise that links all actors involved.
- Linked to questions and considerations of horizontal and vertical accountability.
- Making use of multiple datasets and types of feedback, both quantitative and qualitative.
- Adopting participatory approaches and methodologies⁴⁰.

The workshop report of the International Council on Human Rights Policy notes the value in peer review and evaluation⁴¹. Peer review benefits from the participation of evaluators that have an

³⁷ Ni Ogain E., Lumley T. & Pritchard D., Making an Impact: Impact measurement among charities and social enterprises in the UK, New Philanthropy Capital, London, October 2012.

³⁸ Ni Ogain E., Lumley T. & Pritchard D., Making an Impact: Impact measurement among charities and social enterprises in the UK, New Philanthropy Capital, London, October 2012.

³⁹ Kail A. & Lumley T., Theory of Change: The beginning of making a difference, New Philanthropy Capital, London, 2012.

⁴⁰ Assessing the Impact of Human Rights Work: Challenges and Choices, International Council on Human Rights Policy, Switzerland, 2011; pages 7-8.

⁴¹ No Perfect Measure: Rethinking evaluation and assessment of human rights work, Report of a workshop, International Council on Human Rights Policy, Switzerland, 2012; pages 14-15.

active involvement in human rights work. Staff members from one or more organisations undertake a review of another organisation. This can include a study by reviewers of documentation from the organisation, a self assessment report done by the organisation under review, in country assessment by the reviewers, de-brief between reviewers and the organisation under review, and the production of two reports – one public and one confidential. Mutual learning and a horizontal accountability can result.

The Civicus Civil Society Index is assembled by collecting data through stakeholder consultations, population surveys, media reviews and fact-finding studies⁴².

The Department for International Development in Great Britain distinguishes between three types of data in assessing and monitoring human rights in their country programmes⁴³. They focus on event-based data, expert judgment and survey-based data.

2.7 Conclusion

There is a limited range of literature in this field. However, it is well developed in relation to the work of national human rights institutions. Nonetheless, there is limited evaluation carried out by national human rights institutions and by equality bodies.

There are issues with evaluation. Evaluation methodologies can exercise a pressure on what work the body prioritises and how it is pursued. The work of the body can be driven by what is measurable rather than by what is important. Key achievements such as just sustaining a voice for equality and non-discrimination or preventing invidious change can be rendered invisible.

There are pitfalls that need to be addressed. Causality between the work done by the body and the impact measured can be impossible to establish. Data deficits can preclude the measurement of some impacts. Many equality bodies engage in a broad range of interventions that could demand a complex evaluation methodology.

However, evaluation offers real benefits. It enables the body to assess what is working well. It provides a basis from which to set targets for the work of the body. It provides a means for the body to communicate its objectives and its achievements. It enhances the quality of the work done by the body and improves its internal processes.

National Human Rights Institutions are identified as having the potential to achieve a transformative effect in society. Equality bodies are identified as having the potential to achieve social change. It is important that evaluation is focused on the extent to which this potential is being realised.

A more detailed potential has been established for equality bodies that serves as a framework for developing an evaluation strategy and indicators. Equality bodies have the potential to achieve change in the situation of individuals who experience discrimination; the policies and practices of organisations that employ and/or provide services; the content of and process for policy and legislation; the engagement by a range of stakeholders in promoting equality and combating discrimination; and attitudes to equality, diversity, discrimination and rights held by the general public.

⁴² Civicus Civil Society Index, 2009 - <http://www.civicus.org/csi>

⁴³ A Practical Guide to Assessing and Monitoring Human Rights in Country Programmes: How To Note, A DFID Practice Paper, Department For International Development, Great Britain, 2009.

Evaluation is an integral part of a broader planning/evaluation cycle. A theory of change approach can enable the body to better identify the change it seeks and the steps that are required to achieve such change. A range of evaluation methods emerges from the literature review. These include stakeholder consultations, public surveys, media reviews, and fact-finding studies. Peer review processes also emerge as of value.

3. THE EQUALITY BODIES

3.1 Equality Bodies

It is important to frame the discussion on and the approach to evaluation of the impact of equality bodies and their work on the basis of the role, scope of action, and potential of equality bodies themselves.

Member States of the European Union are required to establish equality bodies under the equal treatment Directives 2000/43/EC (addressing the ground of racial or ethnic origin), 2004/113/EC, 2006/54/EC, and 2010/41/EC (all three addressing the ground of gender). These equality bodies are to:

- Provide independent assistance to victims of discrimination in pursuing complaints.
- Conduct independent surveys concerning discrimination, and publish independent reports.
- Make recommendations on issues relating to such discrimination.

Directive 2000/43/EC lays down a framework for combating discrimination on the grounds of racial or ethnic origin. Its scope encompasses employment, self-employment and occupation, vocational training and guidance, membership of an organization of workers or employers, social protection, social advantage, education and access to goods and services including housing.

Directive 2004/113/EC lays down a framework for combating discrimination based on the ground of sex in access to and supply of goods and services. Directive 2006/54/EC seeks to ensure the principle of equal opportunities and equal treatment of women and men in employment and occupation. Directive 2010/41/EC puts into effect the principle of equal treatment between women and men engaged in an activity in a self-employed capacity or contributing to the pursuit of such an activity.

The recitals⁴⁴ in these Directives give some pointer to the potential envisaged for equality bodies. They state that the protection against discrimination would be strengthened by the existence of an equality body exercising the above functions.

The study of equality bodies commissioned by the European Commission sets out an overview perspective on the purpose of equal treatment legislation and the role of equality bodies in achieving this. It states that “Equal treatment legislation is based on a desire to affect levels of

⁴⁴ Recital 24 of Directive 2000/43/EC, Recital 25 of Directive 2004/113/EC, and Recital 22 of Directive 2010/41/EC.

discrimination in society and the degree of equality enjoyed by different groups covered. Equality bodies are designed to assist in achieving this aim”⁴⁵.

The study of equality bodies commissioned by the European Commission identifies equality bodies as “necessary and valuable institutions for social change”⁴⁶. It establishes their potential impact in terms of:

- Improving “the situation of individuals experiencing the barriers of inequality and discrimination”;
- Enhancing “organisational performance by enabling businesses to invest effectively in diversity and equality systems”;
- Improving “policy-making and ensuring the greatest impact from scarce resources for all in society”;
- Mobilising and contributing “to a broader institutional drive for equality and non-discrimination”;
- Building and informing “a public supportive of and committed to equality and non-discrimination”⁴⁷.

The study of equality bodies commissioned by the European Commission distinguishes between predominantly tribunal type equality bodies⁴⁸ and predominantly promotion type equality bodies⁴⁹. It provides an overview of the types of activities that different equality bodies across the EU are likely to be involved in⁵⁰. These include:

- Activities to enforce the equal treatment legislation including assistance to victims of discrimination that involves predominantly promotion type equality bodies in achieving (informal) settlements, taking cases to a specialised equality tribunal and taking cases to Court and that involves predominantly tribunal type equality bodies in establishing (informal) settlements, conducting investigations and hearing cases, issuing non-binding recommendations or binding decisions, and follow-up to recommendations.
- Promotional work that principally involves promotional type equality bodies in activities to empower stakeholders to support equality policies and practices, supporting employers and service providers to implement good equality practice and measures to empower vulnerable groups.

⁴⁵ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 126.

⁴⁶ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 12.

⁴⁷ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 128.

⁴⁸ Predominantly tribunal type equality bodies spend the bulk of their time and resources on hearing, investigating and deciding on individual instances of discrimination brought before them, while in some cases also performing a number of tasks identified for promotional type bodies.

⁴⁹ Predominantly promotion type equality bodies spend the bulk of their time and resources on supporting good practice, raising awareness of rights, developing a knowledge base on equality and providing legal advice and assistance to victims of discrimination.

⁵⁰ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; pages 79-104.

- Work to build a knowledge base on equality and discrimination involves both types of equality bodies in conducting surveys, publishing reports and making recommendations.
- Awareness raising work that involves both types of equality bodies seeking to build public knowledge of their work and their institution and to influence and shape public attitudes.

3.2 Survey

Twenty eight equality bodies⁵¹ responded to the survey:

- Fourteen equality bodies had carried out no substantive evaluation of the impact of their work.
- Five equality bodies reported some forms of evaluation work. In two instances this was due to their recent establishment.
- Nine equality bodies reported some substantive evaluation of the impact of their work. Substantive evaluation moves beyond a project focus to explore whole areas of work of, or the complete body of work done by, the equality body and establishes a focus on transformative impact of the equality body in terms of overall impact rather than a focus on outputs and outcomes from particular projects.

The five equality bodies that reported some forms of evaluation had conducted evaluations that were focused principally on the evaluation of individual projects and the outcomes from these projects. Service user satisfaction surveys were reported among these examples as a form of evaluation. Internal efficiency audits of particular sections within the equality body, internal monitoring of the implementation of annual work plans, and internal assessment of the quality of work processes were also reported.

The nine equality bodies that reported some substantive evaluation of the impact of their work included evaluations of a general nature that they commissioned, evaluations of particular work portfolios that they commissioned, and evaluations commissioned on their work by external authorities. Evaluations of a particular work portfolio goes beyond evaluation of an individual project by focusing on an area of work of the equality body that can encompass the implementation of a range of actions by the equality body.

Seven of these equality bodies reported commissioning general evaluations:

- The Danish Institute for Human Rights and the Belgian Centre for Equal Opportunities and Opposition to Racism (CEEOR) commissioned surveys of external stakeholder views on the impact of their work.
- The Swedish Equality Ombudsman has just commissioned work to enable the evaluation of three of their long-term goals.
- The Dutch equal treatment legislation requires an evaluation of the legislation and its effectiveness. This includes a focus on the work of what was the Equal Treatment Commission and is now the Netherlands Institute for Human Rights.

⁵¹ Austria, Belgium (2), Great Britain, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Latvia, Luxembourg, Netherlands, Northern Ireland, Norway, Poland, Portugal (2), Romania, Serbia, Slovak Republic, Slovenia, Sweden.

- The Equality Commission for Northern Ireland assessed its performance against targets set in its corporate plan through externally commissioned surveys. An Equality Awareness Survey explored attitudes of the general public, an Employer Satisfaction Survey examined employer levels of satisfaction with the services of the Commission, and a Stakeholder survey assessed stakeholder views on the services of the Commission.
- The Equality Authority in Ireland commissioned an evaluation of its work on foot of the end of period (three year) for each of its strategic plans as an aid in preparing the next strategic plan. The core element to these evaluations was gathering the views of the full range of stakeholders.
- The Centre for Equal Opportunities and Opposition to Racism (CEOOR) in Belgium commissioned an evaluation of its work three years ago. This was based on stakeholder opinions on the implementation of the strategic plan of the CEOOR. The opinions sought included a focus on impact. A second evaluation has now been commissioned and is near completion.
- The Office of the Ombudsman for Equality in Finland conducts general internal evaluations annually in relation to goals set and achievements realized.

Two of these equality bodies reported commissioning evaluations on particular work portfolios:

- The British Equality and Human Rights Commission commissioned evaluations of the effectiveness of three specific fields of work. These included a focus on their impact.
- The Office of the Ombudsman for Equality in Finland commissioned an evaluation of the image and profile of the Office among key stakeholders.

Six of these equality bodies reported externally commissioned evaluations. A number of these included evaluations that were essentially audit-based reviews of their budgets. The evaluations included:

- In Norway the Ministry of Children, Equality and Social Inclusion conducted an evaluation of the Equality and Anti-Discrimination Ombud.
- In Sweden the Swedish Agency for Public Management and the Swedish National Audit Office conducted evaluations of the total work of the Swedish Equality Ombudsman.
- In Finland the Ministry of the Interior commissioned a report on victims' experience of discrimination, the use of redress mechanisms and access to justice.
- In Northern Ireland the Equality Commission for Northern Ireland has secured external accreditation from the European Foundation for Quality Management, LEXCEL and Investors in People. This has involved external evaluation against set criteria and engagement with Commission staff.
- In Ireland a Value for Money audit was carried out on the Equality Authority. This was commissioned by the Department of Justice and Equality. It included a desk review of outputs and a benchmarking with organisations in other jurisdictions.
- In Great Britain the UK Government conducted a Comprehensive Review of the Equality and Human Rights Commission's budget. This was to determine the funding the Government felt

was required for the body to discharge its functions effectively. As with other public bodies the Commission is also subject to a triennial review.

A team drawn from the Better Regulation Executive, the Local Better Regulation Office and the Financial Reporting Council also reviewed the Equality and Human Rights Commission's performance against the Hampton principles of better regulation.

3.3 Interviews

Nine interviews were conducted with those involved in the substantive evaluation initiatives identified in the survey by nine equality bodies⁵². The interviews sought to go more into depth on these evaluation initiatives and to explore the purpose that inspired them, the approach to evaluation involved, the specific methods used, any indicators of impact deployed, and any difficulties encountered.

3.3.1 Purpose

The most common driver for evaluation, evident from the interviews was the planning/evaluation cycle developed by the equality bodies. In Denmark, Northern Ireland, Ireland, Belgium, the Netherlands and Sweden the evaluation initiatives are seen an integral part of their strategic planning processes.

In Denmark the evaluation process was developed in advance of the preparation of the equality body's first strategic plan. In the Netherlands the strategic planning process has evolved considerably as a result of the broadened mandate with the creation of the Netherlands Institute for Human Rights and the new imperative to make choices between priorities in a context of constrained resources. In Finland the evaluation was stimulated by the preparation of a communication strategy.

Four specific purposes for evaluation can be identified from the interviews. These are to:

- Inform choices by the equality body: Evaluation, at its heart, establishes what works. Decision making is enabled to be evidence based by evaluation. A prioritisation of interventions and a more efficient and effective use of resources is supported.
- Enable learning by the equality body: The equality body can take an objective perspective on its work rather than rely on impressions. Evaluation is a tool to work better. The work of the equality body can be continuously improved through the feedback received. People can speak freely about the equality body and this enables more useful feedback. Learning is supported and when an intervention is repeated it is done better.
- Enhance the standing of the equality body: The equality body can demonstrate the value of its work. Equality bodies can be judged on a fair basis. Equality bodies can respond to the increasing pressure to show impact. Satisfaction levels are raised among stakeholders who

⁵² Susanne Nour Magnusson, Danish Institute for Human Rights; Evelyn Collins, Equality Commission for Northern Ireland; Laurence Bond, Equality Authority, Ireland; Charles Hamilton and Andrew Meads, Equality and Human Rights Commission, Great Britain; Jozef de Witte, Centre for Equal Opportunities and Opposition to Racism, Belgium; Barbara Boss, Netherlands Institute for Human Rights; Cathrine Egeland, Work Research Institute (AFI), Norway; Paivi Ojanpera, Office of the Ombudsman for Equality, Finland; and Christine Gilljam, Equality Ombudsman, Sweden.

are involved in the evaluation. The equality body demonstrates a transparency and an accountability.

- Empower staff: Planning and evaluation can inspire or assist staff to be focused in their work. Positive evaluations of the work of the equality body offer the opportunity to value the staff, their work and their contribution.

These four purposes are, in effect, the real and tangible benefits from evaluation.

A number of very particular drivers for evaluation emerged in the interviews. In the Netherlands there is a legal requirement on the equality body to evaluate the equal treatment law for its effectiveness in practice. This includes some level of evaluation of the body itself. In Norway the evaluation was instigated on foot of a political commitment on the establishment of the Equality and Anti-Discrimination Ombud. This multi-ground equality body replaced a single ground gender equality body and this was a source of some controversy. In Belgium the experience of the global development sector was pointed to where 1% of funding has to be used for evaluation. Budgetary issues and budget cuts in particular were also identified as a driver for evaluation by equality bodies.

3.3.2 Approach

The strategic plan of an equality body was seen to be the key enabler for evaluation. It provides the basis for an assessment of impact. In essence the process of evaluation is seen as starting with the strategic plan. Planning and evaluation are deeply intertwined and form part of what is described as an evidence based culture within an organisation.

In Sweden the link between planning and evaluation is seen as crucial in isolating the particular contribution of the equality body. The clarity of goals set by the equality body for what it is trying to do with a particular key actor enables a stronger claim for causality.

This link was posed very succinctly in the Irish context in terms of an evaluation cycle. Work is planned with a view to achieving certain goals. These are identified on the basis of the powers of the body and the context within which the body is working. Goals are defined at the start so that they can be evaluated at the end. Then the mix of feasible activities and outputs that are considered optimal to achieve these goals is decided on. Evaluation explores outputs first. The second focus for evaluation is change. Then there is a focus on assessing the relationship between the outputs delivered and the change achieved. This can be a matter of informed judgment.

The use of proxy indicators for impact was suggested. An impact can be claimed on the basis of evidence already established that certain actions lead to particular outcomes. For example, it is known in Ireland that an equality policy in a company leads to outcomes of organisational change. The presence of an equality policy in a company due to the intervention of an equality body can therefore serve as a proxy indicator for an outcome of institutional change.

It is known, for example, in Northern Ireland that people are more likely to succeed in their cases if they have assistance from the equality body. The provision of assistance can therefore serve as a proxy indicator of impact on transforming the situation of the individual claimant. Sweden is also focusing on forms of proxy indicators in their approach, outlined below. In this context, setting up the impact that might be claimed by the equality body is key. Modest claims are recommended and

it is useful to determine a plausible ‘causal chain’ for how the work of the equality body feeds through to the impact to be claimed.

Simplicity was identified in a number of the interviews as key in the evaluation process. Evaluation cannot be precise. It gives arguments rather than numbers. It identifies “good reason to believe”.

Impact only needs evaluation on a periodic and infrequent basis. A crude and simple model of evaluation can be convincing – outputs and proxy indicators. It can be useful to break the work down into smaller pieces to avoid overloading the evaluation, though it is necessary to combine the different elements at the conclusion. Avoid the demand to be more sophisticated unless absolutely necessary. Evaluation has to be effective, proportionate and sustainable if it is to be credible.

Three very specific approaches were described in the interviews that merit attention.

In Sweden the equality body commissioned external experts to develop indicators in relation to each of three of their five long-term goals and to create a baseline for the current situation in relation to each long-term goal. Indicators are being developed in relation to each of the key actors identified by the Ombudsman as key in advancing the work of combating discrimination. They include trade unions, municipalities, country administrations, the Swedish Association of Local Authorities and Regions, the Swedish Federation of Lesbian, Gay, Bisexual and Transgender Rights, the Disabilities Federation, and the Federation of Senior Citizens.

These indicators will be different for each actor. They are proxy type indicators with a focus on the change the Ombudsman can contribute to in the organisations. This change in the organisations will in turn create a more direct impact on institutional change to combat discrimination and promote equality. A baseline of the current situation in each of the key actors is being developed against which to measure change.

In Great Britain the equality body has been working on an approach under the heading “Public Value”. While the main aim of this work is to inform the selection of interventions, evaluation also forms a key aspect. The focus on value is about the equality body being able to justify interventions on the basis that an informed public, or its elected representatives, can view the intervention as being a reasonable use of scarce public resources, given the powers at its disposal. This focus on value encompasses the optimal mix of social, economic, regulatory, and aspirational/deliberative (i.e. political) impacts that any intervention could achieve (allocative efficiency). A secondary dimension to value relates to the organisation’s resources in carrying out the intervention (technical efficiency). Evaluation, via the identification of appropriate impact indicators forms a third part of this approach.

This focus on specific interventions allows a shift away from the mechanical and simplistic view that if ‘x’ is done then ‘y’ will happen (although this can be an appropriate approach in some cases, for example in the Commission’s recent ‘Stop and Think’ with regard to the use of police powers against members of certain groups). However, it does not allow for any cumulative perspective on impact to be developed (assuming that this is appropriate – the public value work was based on the idea that many interventions were incommensurate and that they could not simply be aggregated) which may be problematic in a large organisation with a diverse and un-linked body of interventions. This is a longer-term objective.

In the Netherlands the approach described offers a particular insight into the specific experience of evaluation of what was a predominantly tribunal type equality body. The basis for the evaluation is

the facts and figures on the cases heard by the body. This focus enables an understanding of where there are problems – issues where there is an increase of cases, for example possibly due to new provisions in the law or issues where groups appear to be under-reporting for example or instances where a decrease in cases might reflect the impact of the case opinions of the equality body. Facts and figures include the results of the extensive follow-up done in relation to each case heard.

An interesting starting point for planning and evaluation was described as key in Belgium. This is the decision made by the equality body on the type of body that it seeks to be. This brings values to the forefront of the evaluation process and of the type of indicators that might be chosen.

3.3.3 Methods

The key elements for evaluation identified in the interviews were a strategic plan and performance indicators. Surveys, stakeholder interviews, self-assessment and follow up to cases were identified as key tools.

Performance indicators are set out in the strategic plan in some instances but are not defined in all cases. Performance indicators need to be meaningful, feasible and proportionate according to the Irish experience. They should be simple to collect and easy to interpret. Procedures and practices should be devised whereby performance indicators feed into the management of performance.

Stakeholder surveys were used in Denmark, Great Britain, Northern Ireland, Belgium, and Finland. Stakeholder interviews were also extensively used, including in Ireland and Belgium. In Norway the survey was done in relation to the general public.

A broad spectrum of stakeholders are involved. These included civil society organisations, Government departments, employer organisations, trade unions, local authority networks, media, academics and clients of the equality body. In a number of instances the staff of the equality body were identified and involved as stakeholders. In some instances stakeholders were chosen that had collaborated with the equality body.

These evaluations tend to be qualitative rather than quantitative given their basis on stakeholder perceptions. Quantitative impacts can be difficult to identify.

In Finland the stakeholder survey was quantitative. The evaluation was focused on the profile, image, and reputation of the equality body. It used a measurement tool called the Osgood Semantic Differential Scale⁵³ to measure stakeholder attitudes and connotative meanings of adjectives used by respondents. It sought the first connotation in relation to a word or couple of words that came into the minds of respondents when they think about the Office of the Ombudsman for Equality. There was a qualitative dimension too with questions as to the experience of the respondents in cooperating with the equality body.

Self-assessment involves an internal review of performance against performance indicators set out in the strategic plan. This self-assessment can focus on impacts as well as outputs and inputs. However, this depends on the nature of the performance indicators. There is also the danger of self-

⁵³ Measures of attitude that require that individuals rate the attitude object on a set of semantic scales, which are bipolar adjectives generally seven steps apart, eg., a scale for rating how a person feels about doing aerobics may include the following: FOOLISH: -3 -2 -1 0 +1 +2 +3 WISE; PLEASANT: -3 -2 -1 0 +1 +2 +3 UNPLEASANT, etc. – Oxford Reference - <http://www.oxfordreference.com/view/10.1093/oi/authority.20110803100255717> and see Heise D., The Semantic Differential and Attitude Research, in Attitude Measurement, ed. Summers G., Rand McNally, Chicago, 1970; pages 235-253 - <http://www.indiana.edu/~socpsy/papers/AttMeasure/attitude.htm>

assessment being subjective with its roots in self-perception and it is important that it is clearly evidence based.

Follow-up by the equality body in the Netherlands, to check on the implementation of their non-binding decisions by respondents found to have discriminated in individual cases, is a tool that also assists evaluation. This has a particular relevance for predominantly tribunal type equality bodies.

A British evaluation initiative, focused on the effectiveness of regulatory interventions, examined sample cases picked in relation to each power of the equality body. Independent consultants explored the tangible business benefits from these regulatory interventions.

An external and an internal dimension are identified in most of the evaluations discussed. An external expert is often contracted to conduct the evaluation. In the Netherlands an external commission made up of key stakeholders was formed to assist the process.

3.3.4 Indicators

The interviews provided a broad range of perspectives on the impacts sought by equality bodies and that are the subject of evaluation in the initiatives discussed.

There was some emphasis on assessing institutional impact. In Denmark the core impact sought is in relation to structural and institutional discrimination – change in the law or in organisational practice. In the Netherlands the key impact sought is a contribution to protection from discrimination made by the law and made by the work and procedures of the equality body. As part of this the impacts sought from the cases heard relate to change in:

- The practice of those organisations involved in the case.
- Policy development at sectoral level such as collective agreements.
- Policy developed at national level by Government including in the equal treatment legislation.

In Sweden indicators are being developed in relation to key institutions and the impact of the equality body on these institutions. These indicators will relate to three of the equality body's five long-term goals⁵⁴ where the equality body seeks to contribute to:

- An understanding of and knowledge about the structural or institutional nature of discrimination and demonstrating that discrimination goes deeper than the individual case of discrimination.
- Enabling more key actors to take greater responsibility for promoting equal rights and possibilities.
- Enabling civil society to strengthen the protection of equal rights and possibilities.

There was emphasis on the impact of the voice and image of the equality body. In Finland five different dimensions of image were considered. These dimensions had been developed specifically for the assessment of public bodies by researchers and applied by the Ministry of Social Affairs and Health. They are:

⁵⁴ A fourth long-term goal relates to legal work and the contribution of the equality body to development in areas with identified need of progress through cases in Court and the supervision of active measures by the Equality Ombudsman. A fifth long-term goal is of an internal nature.

- Authoritative
- Respected
- Reliable
- Serving
- Effective

In Norway the evaluation had a particular focus on the voice of the equality body and the extent to which it was seen as authoritative in the public and among stakeholders. This had a cultural dimension in looking to see if the equality body had made an impact on the discourse on equality and non-discrimination.

This focus on impact on perceptions is also evident in Northern Ireland. The external surveys undertaken by the Equality Commission for Northern Ireland included an assessment of confidence levels of the Commission’s leadership on equality, its independence, its expertise and its ability to promote equality of opportunity for all. These surveys gathered the perspectives held by the general public, employers and stakeholders on these issues.

The ‘public value’ approach in Great Britain is based on four types of impacts that an equality body could make:

- Economic: The better functioning of different markets, in particular the labour market or markets for particular goods and services.
- Social: The inclusion of marginalised groups in mainstream provision and the better provision of services.
- Regulatory: Leading to better regulation of sectors, for example the social care sector and changes in the law where appropriate.
- Deliberative/Aspirational: Stimulating public debate on a particular issue of concern and the promotion of longer-term cultural and organisational change.

The idea is that each intervention by the equality body would be considered for its potential to make an impact under one or more of these four headings and that specific impact indicators would then be developed for the intervention to inform its ultimate evaluation.

The use of proxy indicators in Ireland and Northern Ireland is identified above in section 3.2.2 on approach. Indicators such as employers that put in place equality policies on foot of intervention by an equality body point to a wider institutional impact. In this context output indicators can become important. They can point to results or proximate impact. In some instances input indicators might be important in demonstrating the potential change that is being pursued by equality bodies with inadequate resources.

In Northern Ireland performance measures and targets are set in relation to each objective in the corporate plan. These make use of proxy indicators including, for example, the percentage of stakeholders with an “excellent or very good” relationship with the equality body. Surveys have shown that the more employers have contact with the equality body, the more they change.

These performance measures and performance targets used in Northern Ireland include a concern with under-reporting. Two performance measures point to potential impact in this area. These are

“levels of awareness of the (equality body) and its work” and “take up of key (equality body) services by vulnerable groups and those more recently protected by equality legislation”⁵⁵.

3.3.5 Difficulties

A number of difficulties with evaluation of impact were found to be shared by most of those interviewed. These are:

- The issue of causality. It can be impossible to isolate the impact of the equality body on an issue or to separate out the various elements influencing any change. Action can be associated with change but a causal link is not evident. This is also referred to as the issue of attribution, where change can be identified but not attributed to a specific actor.
- The data doesn't exist, or might not be available on a timely basis, to measure the baseline and/or progress on the impact indicators an equality body might like to use.
- The complexity of tracking performance of a small organisation that in many respects is a catalyst or stimulant for action by others.
- Responses come from stakeholders that hold very different sets of interests. Different interests (complainant, business association or individual company) can have different perspectives on the same intervention and may respond 'strategically' rather than objectively. Evaluators have to apply judgment when interpreting stakeholder perceptions.
- The limited financial and human resources available to equality bodies.
- Using the cases that come to the equality body to explore impact can be limiting. It could be a distorted picture where certain areas of discrimination do not get reported or certain groups are under-reporting or certain groups are more effective in bringing forward their issues.

A number of more cultural barriers to evaluation were identified. In particular, the lack of a culture of strategic planning and evaluation or the absence of an evidence based culture in the equality body. This often pertains within the wider public sector in the jurisdiction. Particular issues were identified where:

- There is a fear of evaluation. This can arise where people do not want to be deflected from what they are already doing and where the outcomes from evaluation might reflect negatively on people.
- It is just assumed that an intervention has had the desired impact. Such assumed impact allows evaluation to be deemed a waste of money.
- Results from initial evaluations are disappointing and this makes the equality body reluctant to engage in further evaluation. However, as the use of evaluation results inform and improve performance, subsequent evaluations can be more positive.

The quality of the strategic plan is important when it comes to measuring impact. In particular it was pointed out that impact evaluation is difficult in the absence of indicators in the strategic plan.

⁵⁵ Reaching Out to the Whole Community, Corporate Plan 2009-2012, Equality Commission for Northern Ireland, Belfast, 2009.

Stakeholders might not know about the work of the equality body and the scale of this work. Their perceptions can be misinformed where the media gives most coverage to litigation and little to development work done by the equality body.

Difficulties in conducting evaluations were identified due to change in the issues worked on by the equality body only happening slowly or indirectly. Expectations can be raised that cannot be met. The equality body can, unfairly, appear ineffective. Claims need to be kept modest.

3.4 Conclusion

Many equality bodies do not evaluate their work (50% of those surveyed). Some evaluate specific projects (18% of those surveyed). A number have developed more substantive forms of evaluation that cover the full range of their work or specific areas or portfolios of their work and that focus on impact (32% of those surveyed). This latter group could reflect a growing trend. There is evidence of significant new thinking and creativity in the approaches these equality bodies are developing.

The planning/evaluation cycle developed by equality bodies is identified as a key driving force for this evaluation work. A strategic plan and performance indicators (both quantitative and qualitative) are key elements in the evaluation process. It is, therefore, significant that many equality bodies have not developed strategic plans. This makes evaluation difficult if not impossible.

Evaluation is seen to inform the choices made by equality bodies and to support learning within the equality body. It is seen to enhance the standing of the equality body and to empower their staff in their work.

A logical chain is usefully identified where evaluation explores outputs, then it explores change and finally it assesses the link between the two. Informed judgment is viewed as a key element in evaluation. Some equality bodies are deploying proxy indicators. Proxy indicators reflect that an impact can be claimed from an output, for example, on the basis of evidence that has already established that certain actions lead to particular outcomes.

Surveys, stakeholder interviews, self-assessment, and follow-up to cases emerge as valuable tools for evaluation. Simplicity in the approach to evaluation is encouraged. Claims for impact should be modest. Care is required with self-assessment lest it be subjective rather than evidence based. An external and an internal dimension is often involved in the evaluation done.

Different perspectives on assessing impact are apparent. Impact at an institutional level is clearly seen as important by most equality bodies. The impact of the voice and image of an equality body or on perceptions held about the equality body and its work are also identified as a useful focus. In one instance a framework of potential impacts is used - economic, social, regulatory and deliberative/aspirational.

A number of difficulties in implementing evaluation are identified. These include the issues of causality, data deficits and complexity (particularly for small organisations) already identified. They also include the challenge of managing the diversity of interests held by stakeholders and the lack of adequate human and financial resources in the equality body. There are cultural barriers, in particular where there is no culture of strategic planning or no culture of evidence based processes within the equality body.

4. ACTIONS TO TAKE IN MEASURING IMPACT

It is useful to establish the purpose of evaluation and what the equality body hopes to achieve specifically through evaluation of its impact. This should encourage the equality body to invest the time and resources required.

Evaluation has a primary importance in ensuring that equality bodies are learning institutions. It enables equality bodies to learn from their work and to continuously improve their performance. Evaluation is, therefore, a process and a way of thinking as much as a concrete action at a particular moment. Staff members, from all levels and roles within the equality body, need to be involved, to the greatest extent possible, so that the learning from evaluation accrues within the equality body.

Evaluation has an important role to play in enabling equality bodies to demonstrate that they make a difference and that their work has public value. Evaluation can also enable the equality body to manage expectations of what it can achieve, to keep its stakeholders informed of progress, and to guard itself against unfair attack or criticism. Evaluation, therefore, needs to be robust and transparent and to involve the participation of stakeholders.

Evaluation forms part of a broader planning and evaluation cycle practiced by the equality body. The key elements in this cycle are:

- A strategic plan that establishes the goals of the equality body, sets out what actions it will take to achieve these goals, and identifies the performance indicators and targets used to assess achievement of these goals.
- A management system to keep performance indicators under review and to ensure that they inform decision making and the work of the equality body on an ongoing basis.
- A monitoring system to gather data on the progress made in relation to the different indicators and targets. This includes monitoring, the inputs to and outputs from the work of the equality body.
- An evaluation of the overall work of the equality body or specific fields of activity or portfolios of work done by the equality body.

There are three linked elements within any evaluation process:

- **Indicators:** The impacts or results expected from the work of the equality body. They are the means by which performance is to be measured.
- **Benchmarks:** A reference baseline of information in relation to each particular indicator is needed. Benchmarks allow the level of change achieved through the work of the equality body to be measured relative to this baseline.
- **Targets:** A standard of performance to be achieved by the equality body within a particular timeframe in relation to each particular indicator. Targets are often quantitative but could also be qualitative.

Evaluation strategies do not have to be sophisticated. They can grow and evolve over time from quite modest beginnings. It is useful to keep this in mind in a context of constrained resources. Simple models of evaluation have secured real benefits for equality bodies.

The use of proxy indicators, as deployed by some of the equality bodies interviewed, can help in this regard. Impact indicators remain important where they can be identified and tracked. However, output indicators can also be used where a claim can validly be made linking particular types of output to broader impacts. In some instances, input indicators can be used, particularly by smaller equality bodies. Input indicators can measure the extent to which the equality body is pointed in the direction of impact, despite limited resources, and the extent to which it is keeping a particular flame alive and burning.

This final section will first set out the evaluation challenge. It will then establish three starting points for evaluation by equality bodies – the potential of equality bodies, the structure, environment, values and theory of change of the equality body, and the goals to be set by equality bodies. A number of principles are then identified for evaluation.

Methods for evaluation are then set out. The methods prior to implementation of action plans, during implementation, and after implementation are identified. Finally a menu of indicators is identified from which equality bodies could select a small number of indicators to focus their work and inform their evaluation.

4.1 The evaluation challenge

4.1.1 Lack of evaluation

Equality bodies and networks of equality bodies need to build an experience in measuring the impact of their work. Some equality bodies evaluate individual projects. Very few equality bodies conduct substantive evaluations of the impact of their work. This situation is integrally connected with the limited number of equality bodies that engage in strategic planning. Less than half of the equality bodies reviewed in the 2010 study of equality bodies commissioned by the European Commission were found to have a strategic plan⁵⁶. Evaluation is only possible to a limited extent in the absence of a strategic plan and change will need to start with support for more equality bodies to engage in strategic planning.

4.1.2 Barriers to evaluation

There are significant barriers to be overcome before it is possible to even devise evaluation strategies. There is a need to:

- Build an experience of evaluating among equality bodies.
- Build a culture of planning and evaluation among equality bodies.

⁵⁶ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 139.

- Overcome the fears of evaluating their organisation that seem to be held among equality body staff.
- Convince equality bodies of the benefits of evaluation and of the importance of investing some of their scarce human and financial resources in evaluation.
- Encourage a focus for evaluation that goes beyond evaluating projects to a focus on evaluating the impact of portfolios of work done by the equality body and/or the overall work of the equality body.

4.1.3 Diversity of equality bodies

Equality bodies are diverse across the different European jurisdictions. Function is a key strand of this diversity. Equality bodies have been broadly divided into predominantly promotion type equality bodies and predominantly tribunal type equality bodies⁵⁷. The scale of and resources available to equality bodies is another key strand of this diversity.

This diversity has implications for devising and implementing evaluation strategies. It is not possible to devise a one-size fits-all model. Each equality body is challenged to assess its own starting points, outlined below, and to devise an evaluation strategy that best fits these starting points while still achieving the purposes of and benefits from effective evaluation. The sections below therefore set out ideas that equality bodies can use and adapt to establish their own evaluation strategies.

4.2 Starting points for evaluation

Three starting points need to be addressed by equality bodies in devising an evaluation strategy. These starting points set the parameters for any evaluation strategy. They enable an evaluation strategy that is realistic and that matches the needs and nature of the particular equality body devising it. They are:

- The potential identified for equality bodies and their work.
- The structure, environment, values and theory of change of the particular equality body.
- The goals to be set by the equality body.

4.2.1 Potential of equality bodies

The first starting point is the potential that has been identified for equality bodies⁵⁸. This potential should provide the framework within which goals are set, indicators are developed, baseline data is gathered and targets are set. The equality bodies, in this research, are found to be “necessary and valuable institutions for social change”. The potential identified covers the contribution that the equality body can make at:

⁵⁷ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010.

⁵⁸ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; pages 126-128.

- An individual level:
 - a. Contributing to change in the situation and experience of individuals who experience discrimination.
- An institutional level:
 - a. Contributing to change in institutional policies, procedures and practices by enabling public, private and civil society organisations to invest effectively in equality and diversity systems.
 - b. Contributing to change in policy making by enabling policy makers to efficiently take account of issues of equality, diversity and non-discrimination.
 - c. Contributing to change by mobilising and capacitating a broader set of institutions to promote equality and combat discrimination.
- A societal level:
 - a. Contributing to change in public attitudes in relation to equality, diversity and non-discrimination.
 - b. Contributing to change in the attitudes of employers and service providers in relation to compliance with equal treatment legislation.
 - c. Contributing to change in the attitudes of those who experience discrimination towards reporting this experience.

The potential for equality bodies to achieve change at each of these different levels is interconnected. In some ways, they can be seen as widening circles of influence from the equality body. Change in one of the levels can influence and stimulate change at other levels. It is the impact over the three levels that captures the overall potential of the equality body.

4.2.2 Structure of, environment for, values of and theory of change held by equality bodies

The second starting point for developing an evaluation strategy within an equality body is to establish what is possible. This requires a realistic understanding of the constraints on the equality body and on the possibilities for the equality body. The following framework might be useful in assessing this starting point:

- Structure: The mandate and resources of the equality body.
- Environment: The political, socio-economic, and cultural context within which the equality body does its work.
- Values: The values practiced and promoted by the equality body and that define the nature and ambition of its work.
- Theory of Change: The type of change that is sought by the equality body from its work, the analysis held by the equality body as to how such change happens and the type of action required to achieve such change.

A review of structure will establish what it is possible for an equality body to achieve. An understanding of the environment will establish the possibilities for change in the context of the

equality body. An explicit articulation of values will establish the ambition of the equality body and the type of change it will prioritise if it is to be consistent with its values. A formal examination of the theory of change held by the equality body will underpin the choice of goals and strategy to be pursued and the mix of activities to be implemented.

4.2.3 Goals for equality bodies

The third starting point for developing an evaluation strategy is to establish clear goals that the equality body seeks to achieve. These should be based on the structure of, environment for, values of and theory of change held by the equality body. The goals should have an ongoing relevance over the lifetime of the equality body's multi-annual strategic plan and should have a time span of three to six years.

Goals should reflect the potential of an equality body. This potential has been identified in terms of a potential to achieve change for:

- Individuals who experience discrimination.
- Institutions that make policy, employ people and/or provide goods and services.
- Society in terms of culture and the values espoused by the public, by key institutions and by groups experiencing discrimination.

Goals should not be devised to suit the evaluation strategy. It is important that equality bodies do not fall into the trap of being evaluation led in their priorities and practices. The literature review points to the problematic potential for equality body agendas to be framed by goals and actions chosen principally because they are measurable and can demonstrate impact. Evaluation is a tool to support equality bodies and what they need to do, not the other way around.

4.3 Evaluation principles

A number of key principles can be identified that should shape the evaluation strategy developed by the equality body. These include:

- Evaluation should form part of a wider process of strategic planning for and monitoring of the work of the equality body.
- The evaluation process should be simple and realistic. It should reflect the starting points established in relation to structure, environment and values.
- The evaluation process should be based on a small number of indicators to secure a meaningful focus on what is important for the equality body in terms of the goals it has set for itself.
- Goals should be kept under review to allow for unexpected developments and to ensure an ongoing relevance for the work of the equality body to what can be a changing context.
- The impact of the equality body should be explored, to the extent possible, in terms of its transformative effect on society as a whole.

- The evaluation process should involve staff and key stakeholders in a participatory approach in devising, implementing and learning from the evaluation.
- The evaluation process should serve the values and goals of the equality body, learning within the equality body, and the accountability of the equality body.

4.4 Evaluation methods: prior to implementation of strategic plan

There will be an ex-ante element to the evaluation of equality bodies. These are steps that need to be taken as part of the planning process prior to the work of the equality body being implemented. This should involve:

- Establishing indicators
- Establishing baselines
- Establishing targets

4.4.1 Establishing indicators

The equality body should identify a small number of indicators. These should relate to the goals that it has set for its work. They will inevitably reflect the theory of change held by the equality body. Indicators can be established in relation to the change the equality body seeks to achieve at:

- An individual level.
- An institutional level.
- A societal level.

These three levels are interconnected, a widening circle of influence (see 4.2.3 above). The International Council on Human Rights Policy highlights that the effectiveness of national human rights institutions need to be measured in terms of their transformative effect on the broader society⁵⁹. The study of equality bodies commissioned by the European Commission found that these were “necessary and valuable institutions for social change”⁶⁰. The impact of the equality body at all of the three levels identified above will contribute to this transformative effect.

Indicators of societal transformation or of social change for equality, diversity and non-discrimination are easy to establish. They could include higher levels of equality at work, in education and in the distribution of public goods. They could include higher levels of acceptance of diversity and greater efforts to make adjustments for diversity. They could include higher levels of access to justice in cases of discrimination and lower levels of discrimination being experienced.

⁵⁹ Performance and Legitimacy: National Human Rights Institutions, International Council on Human Rights Policy, Switzerland, 2004; page 105.

⁶⁰ Ammer M., Crowley N., Liegl B., Holzleithner E., Wladasch K., & Yesilkagit K., Study on Equality Bodies set up under Directives 2000/43/EC, 2004/113/EC and 2006/54/EC, Human European Consultancy & Ludwig Boltzmann Institut für Menschenrechte (BIM), European Commission, 2010; page 12.

However, these indicators are hard to measure. Baseline data is inadequate and data is not collected that serves these indicators across all the grounds covered by equal treatment legislation. Causality, linking changes in these indicators to the work of the equality body, would be impossible to establish. The pace of change in relation to these issues and the scale of most equality bodies is not such that their work is likely to register on these indicators.

An effective approach to developing indicators is to establish indicators that serve as some form of proxy for these transformative indicators. Proxy indicators are outcomes achieved from the work of the equality body. These outcomes are known to have a capacity to impact on the broader measures of transformation suggested above. Proxy indicators allow the equality body to claim a broader transformative impact that is difficult to measure directly. A number of equality bodies are already working with proxy indicators (see 3.2.2).

The key to using proxy indicators lies in the quality of the claim that can be made for this broader transformative impact. Claims made should be modest. It is useful to establish a 'causal chain'.

Equality bodies have developed surveys and studies that offer evidence to underpin some of these claims in relation to proxy indicators. Examples of this include surveys commissioned by equality bodies that show that individuals supported in their claims of discrimination by equality bodies are more likely to succeed⁶¹ and research commissioned by equality bodies that shows that companies that have equality policies in place are more likely to engage in organisational change for equality and diversity⁶².

Proxy indicators offer three benefits in evaluating equality bodies. They:

- Overcome limitations in the availability of data to measure the broader transformative impacts sought by an equality body.
- Enable some level of confidence in causality, that the action of the equality body does contribute to the change that is sought.
- Enable particular outputs, and in some cases inputs, from equality bodies to serve as indicators of impact.

Further work is required to deepen and develop the claims that can be made for a wider range of these proxy indicators.

4.4.2 Establishing benchmarks

The equality body can gather its own baseline data to establish the benchmarks that it needs. This baseline data needs to be relevant to the specific indicators that it has chosen.

Baseline data can be gathered as part of the data collected by the equality body on its own work. This needs to be systematised as an integral part of the way that the equality body does its business. It needs to be broken down by the different grounds that make up the mandate of the equality body and by the different sectors that the equality body works with.

⁶¹ Equality Commission for Northern Ireland.

⁶² See: O'Connell P. & Russell H., *Equality at Work? Workplace equality policies, flexible working arrangements and the quality of work*, Equality Authority, Dublin, 2005 and Russell H. & McGinnity F., *Workplace Equality in Recession? The incidence and impact of equality policies and flexible working*, Equality Authority & ESRI, Dublin, 2011 and Russell H., Watson D. & Banks J., *Pregnancy at Work: A national survey*, HSE Crisis Pregnancy Programme & Equality Authority, Dublin, 2011.

Data collection by the equality body involves:

- Keeping a record of 'events'.
- Seeking information from those who make contact or from those involved in 'events'.
- Follow up from 'events' by making contact with the relevant people.

This data can be organised in terms of the potential of the equality body. At the individual level, this data can include the number of:

- People that make contact with or inquiries to the equality body – keep a record and seek information from those who make contact.
- The results for people from the inquiries that they make to the equality body – keep a record and, as necessary, follow up with those who made contact.
- Cases that are supported by or heard by the equality body – keep a record and seek information from those involved.
- The results of the cases supported by or heard by the equality body – keep a record and, as necessary, follow up with those involved.

At the institutional level, this data can include the number of:

- Organisations that are engaged with by the equality body – keep a record.
- Policy recommendations that are made by the equality body – keep a record.
- Consultations with policy makers that the equality body participates in or is invited to make submissions to – keep a record.

At the societal level, this data can include the number of:

- Public speaking engagements by the equality body – keep a record.
- Engagements with the media by the equality body – keep a record.
- Engagements with the education system by the equality body – keep a record and, as necessary, follow up with those involved.
- Contacts on the website of the equality body – keep a record and seek information from those who make contact.
- Links with social media platforms of the equality body - keep a record.
- Information materials disseminated by the equality body – keep a record.

Baseline data can be gathered as part of the stakeholder engagement by the equality body. Consultation with stakeholders can provide data on the relevant policies, procedures and practices in relation to equality, diversity and non-discrimination implemented by stakeholders that the equality body seeks to engage with. This baseline data will be most useful in relation to indicators set for work seeking to impact at the institutional level.

The equality body can also conduct broader surveys of organisations and sectors that it wishes to engage with to gather such baseline data. These surveys can establish the level or nature of policies,

procedures, and practices in relation to equality, diversity and non-discrimination within these organisations.

The equality body can commission studies to gather baseline data in relation to its indicators. In some instances equality bodies have done this as an integral part of their programme of research and policy influencing work. In other instances it might be necessary to commission research to establish baseline data for the work of the equality body.

The equality body can establish baseline data by using data already collected by other entities in its national context or at EU level. Data collected in relation to the labour market, education and social inclusion is developed in a manner that addresses a number of the grounds covered by the equal treatment legislation at the Member State level and at EU level. Data is gathered in relation to discrimination in the Eurobarometer surveys and, in some instances, in survey work done by national statistics offices. However, there are significant data gaps in relation to many of the grounds covered by the equality bodies.

4.4.3 Establishing targets

Targets can be set by the equality body in relation to each of the goals that it has set for its work. The targets will be established in terms of the specific indicator established to measure progress towards each goal.

The targets set will:

- Build on the baseline data gathered and benchmarks set in relation to the particular indicator.
- Reflect the resources available to the equality body.
- Reflect the priority accorded by the equality body to the particular indicator.

4.5 Evaluation methods: during implementation of strategic plan

There will be an ongoing element to the evaluation of equality bodies. This can involve:

- Monitoring
- Management

4.5.1 Monitoring

The equality body needs to establish effective systems for gathering data in relation to its work. These systems are internal to the equality body. The data gathered should address events and outputs such as:

- Inquiries to the equality body.
- Outcomes from inquiries to the equality body.

- Cases heard or supported.
- Outcomes from cases heard and supported.
- Organisations engaged with and supported.
- Guidance prepared and disseminated.
- Policy recommendations made.
- Consultations with the equality body sought by policy makers.
- Research and surveys published and disseminated.
- Media coverage.
- Educational establishments bringing equality issues into their curricula.
- Engagements with stakeholders.

The data should be disaggregated, where possible and appropriate, by the ground of discrimination involved.

4.5.2 Management

The equality body needs to establish management systems that sustain a focus on the goals, indicators and targets set by the equality body for its work. This could include:

- Management events being organised to assess progress on goals, indicators and targets and to keep goals under review.
- Management decision making being based on a consideration of the impact of key decisions on goals, indicators and targets.
- Management reporting being built around progress on goals, indicators and targets.

4.6 Evaluation methods: after implementation of strategic plan

There will be a post facto element to the evaluation of equality bodies. These are the steps that need to be taken at the end of the time period established in the strategic plan within which the goals set should be achieved or advanced in accordance with the indicators and targets set.

These steps can involve:

- Review of relevant documentation and files held by the equality body on the different areas of its work. This would include casefiles and files on inquiries in a manner that respects confidentiality.
- Consultations and interviews with stakeholders that have engaged in some way with the work of the equality body.
- Surveys of stakeholders and of the general public.

- Fact finding studies.
- Follow up, in particular by predominantly tribunal type equality bodies, on foot of cases heard to assess the extent to which the respondent has taken the actions recommended.

The equality bodies can use these evaluation tools in:

- Conducting a self-assessment of the work done by the equality body in relation to the benchmarks established, the indicators set, and the targets identified for its work.
- Commissioning external experts to review and assess the work of the equality body in relation to the indicators, benchmarks and targets set by the equality body.

Stakeholders can include a broad range of organisations with a diverse set of interests. They can cover civil society organisations, employers and employer organisations, trade unions, Government Departments, public authorities and public authority networks, media, academics, clients of equality bodies and staff of equality bodies.

Equality bodies, with the support of Equinet, could also develop peer review mechanisms. These would enable evaluation of the work of an equality body at an appropriate moment in its planning/evaluation cycle. This would involve staff from equality bodies in other jurisdictions forming a team to review the work of the equality body and the manner and extent to which it has attained its goals.

TABLE ONE: A MENU OF EVALUATION ACTIONS		
PHASE	TASK	ACTIONS
Prior to implementing the equality body's plan	Establish indicators	Indicators identified for each of the goals set by the equality body.
	Establish benchmarks	Equality body data collection. Conduct surveys. Commission studies. Access data from other sources.
	Establish Targets	Targets set for each goal of the equality body and with reference to indicators identified.
During implementation of the equality body's strategic plan	Monitoring	Gather data on equality body work. Disaggregate data gathered.
	Management	Assess progress being made and keep goals under review. Ensure decision making based on consideration of impact on goals. Build reporting around goals, indicators, and targets.
After implementation of the equality body's strategic plan	Self-assessment	Review equality body documents. Conduct surveys. Commission fact-finding studies. Engage in follow-up.

	Commission external experts	Review and assess the work of the equality body in relation to indicators, benchmarks and targets set by equality body.
	Peer review	A team of staff members of equality bodies in other jurisdictions review the work of the equality body and the manner and extent to which it has attained its goals.

4.7 A menu of possible indicators

Twenty seven potential indicators are set out below. It is not expected that equality bodies would take up all these indicators. They serve as a menu from which to choose and from which to design indicators that suit different equality bodies. The choice of indicators made will reflect the theory of change held by the equality body.

Equality bodies should select a small number of indicators from this menu. This would ensure that the equality body is focused on indicators that are key given the goals it has set for its work. It would enable a more meaningful tracking of progress and impact.

Some indicators are input indicators, others are output indicators and some are more impact oriented. Most are proxy indicators, as described above. Many of the indicators can be self-assessed and some of the indicators require surveys or access to nationally available data sources.

4.7.1 Potential of equality bodies

The potential identified for equality bodies provides a useful framework within which indicators can be developed. This framework is outlined in detail above and covers the contribution that the equality body can make to change at:

- An individual level.
- An institutional level.
- A societal level.

It is useful to acknowledge that these three levels are interconnected – change at one level can be a stimulus for change at another level. The theory of change espoused by the equality body should provide some insight into the interconnections. It is the combination of impacts at the three levels that reflects the overall impact of the equality body.

4.7.2 Indicators for the individual level

Change is sought in:

- The situation and experience of individuals who experience discrimination.

Indicators for the individual level could include a focus on outputs in relation to engagement with individual claimants. These outputs can be measured through data collection by the equality body. The scale of and growth in these outputs provides some indication of impact on under-reporting. There is evidence to link contact by claimants with equality bodies and their likelihood of success in their claims of discrimination. The following output indicators could be used:

1. The number of individuals who make contact with the equality body and whose inquiries are responded to.
2. The number of individuals supported to take or resolve cases of discrimination or whose cases are heard or mediated.

Indicators for the individual level could also focus on transformative impact in terms of change achieved for the individual claimant. Satisfaction questionnaires, surveys and claimant interviews could be used to gather data. The following indicators could be used:

3. The number of inquiry outcomes that meet claimant expectations.
4. The number of casework outcomes that meet claimant expectations.

All indicators in relation to the individual level need to be broken down by the ground of discrimination. This will allow impact at the individual level to be assessed in relation to the different groups covered by the mandate of the equality body.

4.7.3 Indicators for the institutional level

Change is sought in:

- Institutional policies, procedures and practices.
- Policy making processes and outcomes.
- Engagement and capacity of organisations promoting equality and combating discrimination.

Indicators for the institutional level could include input indicators. These are not a strong indicator of impact. However, particularly for smaller equality bodies, input indicators offer evidence of the potential they seek to realise despite a scarcity of resources. Inputs can be measured through data collected by the equality body. The following indicators could be used:

5. The number of initiatives taken by the equality body to support employers and service providers to engage in good practice and the level of investment in these.
6. The number of survey or research initiatives taken by the equality body to inform policy making and the level of investment in these.
7. The number of initiatives developed to enable the work of other organisations promoting equality and combating discrimination and the level of investment in these.

Indicators for the institutional level could focus on output in terms of engagement with organisations, supports provided to organisations, and engagement with policy makers. These outputs can be measured through data collection by the equality body. There is evidence to link equality body engagement with organisations to institutional change for equality and diversity and

to link equality body support to organisations in developing equality policies, procedures and practices to institutional change. The following output indicators could be used:

8. The number of organisations, employers and/or service providers, which engage with the equality body.
9. The number of organisations, employers and/or service providers, stimulated, supported or required to put in place equality policies, procedures and/or practices.
10. The number of instances when policy makers developing new policy or reviewing existing policy consult the equality body.
11. The number of policy recommendations made by the equality body.

Indicators for the institutional level could also focus on transformative impact in terms of change achieved within institutions. Stakeholder interviews and surveys could be used to gather this data. The following indicators could be used:

12. The number of policy recommendations made by the equality body that are taken up by policy makers.
13. The number of changes made in equal treatment legislation on foot of interventions by the equality body.
14. The number of casework outcomes that result in new interpretations of the equal treatment legislation in the jurisprudence.
15. The number of employers and service providers that have developed equality policies, procedures and practices as a result of their engagement with the equality body.
16. The number of civil society organisations that take new actions to promote equality and combat discrimination within their sector or within society, which have been supported by the equality body.
17. The number of employer and employee organisations that take new actions to promote equality and combat discrimination within their sector or within society, which have been supported by the equality body.

All indicators in relation to the institutional level need to be broken down by sector. This will enable an assessment of impact to be made in relation to the different sectors engaged by the equality body. In some instances these indicators need to be broken down by the ground of discrimination to enable an assessment of impact on the different groups covered by the mandate of the equality body.

4.7.4 Indicators at the societal level

Change is sought in:

- Public attitudes to equality, diversity and non-discrimination.
- Employer and service provider attitudes to compliance with equal treatment legislation.
- The attitudes of those who experience discrimination towards reporting this experience.

Indicators for the societal level could include input indicators. These are not a strong indicator of impact. However, particularly for smaller equality bodies, input indicators offer insight into the

potential they seek to realise despite a scarcity of resources. Inputs can be measured through data collected by the equality body. The following indicators could be used:

- 18. The number of initiatives taken by the equality body to raise awareness of the equal treatment legislation, the equality body, and equality issues and the level of investment in these.

Indicators for the societal level could focus on output in terms of engagement with the media and in public debate. The claims for impact are not particularly developed in this area. The following output indicators could be used:

- 19. Informed media coverage of key messages articulated by the equality body.
- 20. The level of participation by the equality body in public debate on the equality, diversity and non-discrimination messages that it has identified as key.

Indicators for the societal level could also focus on transformative impact in terms of change achieved within educational establishments, in relation to knowledge levels held within particular groups and in relation to under-reporting. Surveys would be needed to gather data on these indicators. In some instances stakeholder interviews could be used. National and EU data collection systems could be of assistance in some instances. The following indicators could be used:

- 21. The level to which the equality body voice is deemed to be an authoritative voice by stakeholders identified as key by the equality body.
- 22. Initiatives taken by educational establishments, on foot of intervention by the equality body, to enable learning about equality, diversity and non-discrimination.
- 23. Knowledge of and commitment to the equal treatment legislation and its key provisions among employers, service providers, trade unions and consumer bodies.
- 24. Knowledge of the equality body among the general public.
- 25. Knowledge of and engagement with the equal treatment legislation and its key provisions among organisations representing groups experiencing discrimination.
- 26. Knowledge of the equality body among groups that experience discrimination.
- 27. Level of those who perceive that they have experienced discrimination and do not take action in response to this experience.

Indicators in relation to the societal level will in some instances need to be broken down by sector and in some instance by the ground of discrimination. This will enable an assessment of impact to be made in relation to the different sectors engaged by the equality body and in relation to the different groups covered by the mandate of the equality body where this is appropriate.

TABLE TWO: A MENU FROM WHICH TO SELECT INDICATORS		
LEVEL	TYPE	INDICATOR
Individual	Output	The number of individuals who make contact with the equality body and whose inquiries are responded to.
		The number of individuals supported to take or resolve cases of discrimination or whose cases are heard or mediated.

	Impact	The number of inquiry outcomes that meet claimant expectations.
		The number of casework outcomes that meet claimant expectations.
Institutional	Input	The number of initiatives taken to support employers and service providers to implement good practice and the level of investment in these.
		The number of survey or research initiatives implemented to inform policy making and the level of investment in these.
		The number of initiatives developed to enable the work of other organisations in promoting equality and combating discrimination and the level of investment in these.
	Output	The number of organizations (employers and/or service providers) which engage with the equality body.
		The number of organizations (employers and/or service providers) supported or required to put in place equality policies, procedures and/or practices.
		The number of instances when policy makers consult the equality body when developing new policy or reviewing existing policy.
		The number of policy recommendations made by the equality body.
	Impact	The number of policy recommendations made by the equality body that are taken up by policy makers.
		The number of changes made in equal treatment legislation on foot of equality body interventions.
		The number of organizations (employers and/or service providers) that have developed equality policies, procedures and practices as a result of their engagement with the equality body.
		The number of civil society organisations that take new actions to promote equality and combat discrimination, which have been supported by the equality body.
		The number of employer networks and employee organisations that take new actions to promote equality and combat discrimination, which have been supported by the equality body.
Societal	Input	The number of initiatives taken by the equality body to raise awareness of the equal treatment legislation, the equality body, and equality issues and the level of investment in these.
	Output	Informed media coverage of key messages articulated by the equality body.
		The level of participation by the equality body in public debate on the equality, diversity and non-discrimination issues that it has identified as key.

	Impact	The level to which the equality body voice is deemed to be an authoritative voice by stakeholders identified as key by the equality body.
		Initiatives taken by educational establishments, on foot of intervention by the equality body, to enable learning about equality, diversity and non-discrimination.
		Knowledge of and commitment to the equal treatment legislation among employers, service providers, trade unions and consumer bodies.
		Knowledge of the equality body among general public.
		Knowledge and use of the equal treatment legislation among organisations representing groups experiencing discrimination.
		Knowledge of the equality body among groups that experience discrimination.
		Percentage of those who perceive that they have been discriminated and do not take any action in response.

5. REFERENCES

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6. ANNEXES - SURVEY QUESTIONNAIRE

SURVEY QUESTIONNAIRE – EVALUATING EQUALITY BODIES

1. Have you conducted or commissioned an evaluation of your work or any part of your work at any time during the last five years?
2. What elements of your work were included in this evaluation?
3. Did this evaluation have a focus on the impact of your work on any part of the society around you? If not, what was it focused on?
4. How was the evaluation carried out? What key methods were used?
5. Has any external evaluation been carried out on your equality body or your work by another organisation during the last five years? Could you give some details of what was evaluated and how it was carried out?
6. Would you be willing to talk to Niall Crowley on the phone about this evaluation work? Could you give your contact details?

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