APPROACH PAPER

The EBRD’s experience with policy dialogue in Ukraine

May 2013

EBRD EVALUATION DEPARTMENT
The Evaluation department (EvD) produces approach papers to guide the conduct of an evaluation and to inform stakeholders of the approach proposed. Although comments are welcome, EvD is the sole decision-maker incorporation of comments. An approach paper is the first output and milestone of an evaluation. Approach papers will generally approved by the Chief Evaluator 2–4 weeks after a study has started, and be based on a preliminary document review and initial internal consultations. Complex studies may require more time before clarity emerges on the objectives, evaluation questions, conceptual basis for the study and methods to be employed.
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1 Introduction

1.1 The evaluation

This study, ‘The EBRD’s experience with policy dialogue in Ukraine’, is a thematic evaluation directed at deriving useful findings and lessons to contribute to more effective future policy dialogue, both in Ukraine and more widely, as the EBRD strengthens its policy dialogue work.

1.2 Rationale for inclusion in the work programme

In July 2012 the incoming President of the EBRD formed a task force on policy dialogue to "elaborate and present recommendations for a more strategic, effective and accountable policy dialogue." In November 2012 the task force made recommendations in four areas, namely:

- Stepping up policy dialogue in areas of EBRD comparative advantage;
- Developing a more strategic approach to policy dialogue and a review mechanism;
- Assigning clear incentives, responsibilities, deliverables and budgets;
- Improving monitoring and reporting on impact.

The recommendations made by the task force were accepted by Management and work is underway to implement them. The current study aims to contribute useful ideas for strengthening policy dialogue by the Bank.

Using a single country case study will allow for an in depth analysis of several practical examples of policy dialogue. By relating these to contextual features, the aim will be to produce a source book of ideas relevant to those operating in Ukraine and elsewhere.

Ukraine was selected as the country of study based on the proposition that the size of the EBRD's programme in relation to the size of the economy, and the EBRD's share of total foreign direct investment potentially positions the Bank to be influential. Coupled with this, Ukraine is generally perceived as being a challenging environment in which to engage in policy dialogue. Ukraine is also one of the most
illustrative countries of Bank’s operations in Europe, where the post-soviet transition process assisted by the EBRD and other IFIs/donors is both complex and challenging. Given this, the learning opportunities are likely to be richer than might emerge from a less challenging or representative environment.

1.3 Intended audience

The study will have a number of audiences:

– The Vice President’s policy group and others involved in implementing the task force recommendations
– The President, senior managers, bankers and staff of Office of the Chief Economist and Office of the General Counsel (in particular the Legal Transition Team) who carry out policy dialogue on behalf of the Bank
– Board members who are vitally concerned about progress being made by countries of operation in reform/transition and the contribution that policy dialogue makes to this.
– Potentially, in-country audiences, such as other IFIs/donors working in Ukraine, and government representatives who are leading the collaboration initiatives with EBRD and other international organisations.

1.4 Preparation of the approach paper

Given that policy dialogue is a poorly documented area and its evaluation is challenging and potentially sensitive, a deliberate and consultative approach was taken. Those consulted during preparation of the approach paper include:

– members of banking teams (in London and Kiev) which had been identified as having undertaken significant policy dialogue in Ukraine;
– members of the Management team;
– staff of Office of the Chief Economist;
– the Legal Transition Team;
– members of the policy dialogue task force;
– the Alternative Executive Director representing Ukraine, and,
representatives of the international community in Ukraine with whom EBRD usually coordinates its policy dialogue work.

No attempt was made to contact serving members of the government or EBRD clients. One former official was interviewed.

A literature review has been undertaken to help shape the evaluation framework covering both the academic literature and relevant evaluations. A range of country ranking indexes has been explored as to their utility for describing relevant aspects of country and sector context.

1.5 Literature review

A selective literature review is being conducted as input to the approach paper and the evaluation. The five documents listed below have contributed significantly towards the approach for the current study and the findings of three will provide a rich basis for comparison in due course.

EvD's previous study on policy dialogue\(^1\), welcomed by both Management and the Audit Committee, identifies the levels at which policy dialogue is conducted by the EBRD as: high level, international level, country level, sector level and project level. The study further identified a number of areas that could be strengthened. The findings were used by the Task Force on Policy Dialogue and also provide a useful baseline for the current study. The evaluation team has benefited from discussions with the previous team on challenges faced during the earlier evaluation.

Other EvD evaluations will also provide valuable input into the current evaluation including: the 2012 evaluation of the Legal Transition Programme, the 2011 Power and Energy Sector Review (Ukraine was a case study country), the 2011 Transport Operations Policy Evaluation, Evaluation of the Early Transition Country Initiative and the 2011 evaluation of the Bank's Small Business Finance Operation Policy.

AusAID’s recently published major evaluation of policy dialogue\(^2\) followed a separately published comprehensive literature review.\(^3\) Both are highly relevant to the current study, both in terms of the methodology adopted and findings. The study used

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the hypothesis "the theory of success" as the basis for its assessment.

- DfID’s ‘How to Note: Evaluating influence’\(^4\) provides useful methodological guidance for the current study.

- Grindle and Thomas’ seminal work ‘Public Choices and Policy Change.’\(^5\) focuses on the political economy dimension of reform. It has influenced the approach to the current study.

- ‘The role of IMF as a trusted adviser’\(^6\) is an evaluation conducted by the Independent Evaluation Office of the IMF which provides interesting findings that will be compared to those produced by this study.

### 1.6 Definition of policy dialogue

To settle the scope of the study, a definition of policy dialogue is required. The Task Force on Policy Dialogue provided the following definition of policy dialogue:

> "Policy dialogue at the Bank involves engagement with policy makers and other stakeholders with the view to improving government policies. It takes place at the international, national, sector, and project levels. The more specific policy dialogue objectives include: (i) enhancing policy frameworks that affect specific Bank operations; (ii) affecting the Bank’s transition agenda at the country level (including strengthening institutional/business environment and sector reforms); and (iii) influencing international policy frameworks on issues core to the Bank’s development and operational agendas (e.g., integration of the countries of operation into the global trade, finance and production chains, financial sector regulations, cross-border regulatory coordination, etc.)"

The Task Force went on to provide what it calls “a precise definition of policy dialogue within the Bank” based on policy areas, policy activities and specific policy products. This is very helpful. However, this definition focuses on activities and outputs rather than the processes involved, and, given that the focus of this evaluation is on the process of policy dialogue rather than its content, the evaluation team proposes the

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4 DfID. 2013. How to Note: Evaluating Influence. Evaluation Department
following working definition of policy dialogue for the purposes of this study:

“Interactions and actions taken by EBRD staff and/or consultants with policy actors in Ukraine for the express purpose of bringing about changes in policies, legal and regulatory frameworks, institutions and practices, perceptions and attitudes in Ukraine to create positive transition-related results and overall societal benefit. Policy actors may include politicians, government officials, organised groups in society and other international parties. Interactions may be direct or indirect – the former may involve direct engagement with decision-makers and policy implementers or those that have influence on them while the latter may involve coordination among international parties, advocacy via the media and public events or preparation of analytical work as the basis for policy dialogue.”

1.7 Context of policy process in Ukraine

The evaluation study must be rooted in a deep understanding of the country context and determinants of the policy process if it is to provide useful and practical analysis.

The following determinants are among those considered important for this evaluation study:

1.7.1 Historical

Ukraine is a transition country whose path to the market economy and fully fledged democracy has been, and remains, challenging. The country has spent two decades building basic economic and political structures that did not exist before. It has made good progress in some sectors but less in others. The legacy of the Soviet era is very much still alive in the minds of the older generation, and historical lines of division also remain.

1.7.2 Spatial external/internal

Ukraine’s geographical location is unique and it is often identified as a “country located on the cross-roads.” A positive side to this is the huge potential for Ukraine to capitalise on key North-South and East-West trade routes. The negative side is the continuous geopolitical battles that are being fought across Ukrainian territory. Ukrainian society is divided along the lines of historical borders and perceptions of national identity and belonging. In the past the different regions of modern Ukraine were parts of different empires. This has resulted in quite distinct ethnic, cultural, language and religious differences and rather complicated sub-national politics/governance. Despite these differences, Ukraine is a
unitary state and its regions and cities have relatively few powers, with the exception of the Autonomous Republic of Crimea.

1.7.3 Demographic/social

Ukraine experiences one of the fastest rates of depopulation in the world. Over the last 20 years its population has fallen from 52 to 45.5 million due to natural negative growth and migration. Those leaving the country are mostly young and educated, which leaves Ukraine’s demographic profile skewed towards older generations, which have the greatest political leverage as they are also the more likely to vote. Their needs, often different from the needs of younger generations, investors and IFIs, usually form the cornerstone of election campaigns and government policies. Understanding this electoral reality is important for holding realistic expectations from government stakeholders.

1.7.4 Cultural/social/linguistic

Ukraine traditionally has had high human capital. However, social capital remains underdeveloped, especially between non-related individuals. Reliance on connections is an integral part of Ukrainian society, which is also visible at the highest political level. This creates conditions for unfair practices in business and public sector, widespread corruption and bribery. Language is a big political issue in Ukraine – since independence there was reversal of the formerly oppressive policy towards the Ukrainian language. However, in the last couple of years the government’s linguistic policy has again supported the expansion of the Russian language in political and educational spheres, and everyday life. This creates additional tensions in the society.

1.7.5 Constitutional

Over the last decade Ukraine twice dramatically changed its constitutional arrangement. From being a presidential-parliamentary republic from 1992 it changed into a parliamentary-presidential one in 2004 with a significant de-concentration of powers. However, the multitude of power centres that resulted had negative effect on governance and in 2010 President Yanukovych reversed the process of constitutional reform and restored most of the presidential functions.

1.7.6 Political will and personalities

Usually it is essential to have a committed leader to deliver radical policy reforms, even more so in Ukraine where personalities have much greater leverage than in many other countries; the judicial system is susceptible
to political pressure; and consistent civil control over power is lacking. Progress is usually achieved when a reform agenda coincides with the aspirations of the leader. Business success is often dependent on loyalty to the political elites and leadership. Also in Ukraine, radical reforms are often reversed or amended.

1.8 Understanding the EBRD's comparative advantage

The EBRD's recent Task force on Policy Dialogue stated that the Bank's comparative advantage in policy dialogue, was its:

- Position at the interface between private and public sector and the Bank’s in-depth expertise in promoting private sector development along with its role of public sector investor enhance EBRD’s credibility in conducting policy dialogue;
- Practical market experience stemming from past investments and to the Bank’s knowledge of best regulatory and business practices;
- Country expertise and its presence in the countries of operations through resident offices which allows it to better identify policy needs;
- Reputation for relative efficiency and responsiveness leading to positive client relationships.

The evaluation will seek to verify the nature of the EBRD’s comparative advantage in policy dialogue in the Ukraine context.

2 Evaluative framework, scope and methods

2.1 Evaluative framework

A framework is necessary to provide a basis against which policy dialogue is evaluated and for the study findings to be a source of learning. Past and current experience needs to be described and analysed in a way that reveals patterns that can be recognised in the future when similar circumstances arise. In other words, a way must be found to make sense of experience so its applicability and relevance can be determined.
However, policy dialogue does not lend itself to neat and tidy models. The reality is much more complicated - what some have termed "the messy reality of policy making." Simple models are largely useless because they often lack the capacity to incorporate wide ranging and competing factors that affect the result. They are based on a concept of rational decision making that usually does not happen in practice. The framework proposed for this study is rooted in the values, priorities and transition objectives of the EBRD, and draws on the work of others and the prior experience of the evaluators, with customisation to suit the purposes of this evaluation.

The model identifies a number of elements of the policy dialogue process that come together, much as in a kaleidoscope, to form a pattern. But give the kaleidoscope a shake and the pattern re-forms, sometimes quite differently. Thus, a key feature of this model is that the alignment of, and interrelationships among the elements is not fixed - rather, it is assumed that they can and likely will change, often in unpredictable ways and at unexpected times. The elements of the policy dialogue process recognised by this study are: the issue (or opportunity), solution, actors, actions, outputs, outcomes and context. Each is discussed briefly below.

2.1.1 The policy issue

The policy issue, or opportunity, leads to an individual or group desiring to bring about change to the status quo. Since this is an evaluation of the EBRD's experience with policy dialogue in Ukraine we are principally concerned with the policy problems, issues and opportunities that the EBRD recognises as significant for progress in achieving transition outcomes, and which are in the focus of its activities in the country. These issues, at least at the start, may not be recognised or shared by other policy actors, or in particular by decision makers, policy implementers and their advisers. As one interlocutor has sagely observed to the team "you have to sell the problem before you can sell the solution." The formulation and "selling" of the problem is a negotiated outcome among policy actors that are likely to have very different perspectives, priorities, diagnosis of the problem and its solution, and even radically different "world views."

2.1.2 The policy solution

The policy solution (or message) to the issue or opportunity should be based on analytical evidence of the causes of the problem with evidence that the "solution" will in fact produce the desired benefits at an
acceptable cost, and is the most technically appropriate and politically feasible among a range of available options. However, experience has shown that “solutions” (preconceived views about what is the right action) often seek problems to solve rather than emerging from a thorough analysis of the problem in its context. Policy advocates sometimes go armed with ready-made solutions (privatisation, corporatisation, public private partnerships and so on) without first fully understanding the problem and the constraints and incentives policy decision makers face, or the peculiarities of implementation process. Again, the “solution” is often the result of a negotiation process that ends up with some that is “doable” rather than optimal.

2.1.3 Policy actors

Policy actors are the individuals or groups that carry out the policy dialogue, who, for the purposes of this study have been classified according to the following typology based on the roles they play (recognising that at the same or different times an individual or group may play more than one role):

- **Decision Makers**, being those with the power and influence to make and implement policy. Since we are mostly concerned with public policy, decision makers will generally be in government (central or local) and will be either political figures or officials of the bureaucracy. In some sectors of EBRD engagement there are non-governmental and private sector actors that might also take part in the decision-making process. There may be an individual decision maker (for example president or prime minister, deputy minister/head of agency and so forth) or group of decision makers (for example, council of ministers or cabinet).

- **Advisers** from whom decision makers seek guidance before acting (or not acting).

- **Advocates** for a particular policy position that actively support the status quo or seek to bring about a change in policy. For this study:
  - the EBRD, its staff and consultants acting on its behalf are the main advocates of concern
  - other international parties with whom the EBRD may coordinate or act jointly
  - domestic business associations.

An important distinction between advocates and the
advocacy of interested parties is adopted by this study - namely, that while advocates may act in a self-interested way they are not directly affected by a policy action so their advocacy is usually visible and uses legitimate means. Interested parties, however, are directly affected and their advocacy may or may not be visible, and the means they adopt may or may not be legitimate according generally accepted international "rules of the game."

- **Interested parties** (and their coalitions) are those that are, or would be affected positively or negatively by a particular policy action. If they feel under threat (either from the very beginning or at a later stage of the change process), or they seek to gain from policy action they may become advocates themselves or use advocates or other means of influence to support their position. Almost all policy actions involve winners and losers. The latter derive benefits from the status quo which may diminish or disappear in the event of a policy change. Losers are often few in number and the loss they would suffer may be very significant to them individually. Conversely, the winners are often large in number and the individual gain less significant. Coupled with this, the immediate costs of policy change (borne by the losers) generally occur before the benefits are realised. Additionally, different policy actors may have different views on the longer term costs and negative impacts of a change in policy and may apply a high discount rate to longer term benefits. Further, because of their entrenched position or for other reasons, potential losers are often powerful and influential while would-be winners are often not powerful or influential. These realities mean that potential losers are often better organised and better able to fight hard and effectively to protect their position while the support of potential beneficiaries is often "lukewarm" and not particularly influential. However, coalitions might potentially have an impact on the balance of power, where several less influential actors unite their efforts and as a result achieve a change that was unattainable for them individually.

- **Influencers** whose main role is to help shape public opinion - for the purposes of this study the focus will be on the media, expert community and academia.
2.1.4 Policy actions

Policy actions (or inactions) are the things done by policy actors to get issues on to the policy agenda, select preferred policies from among the options available and to implement the agreed policy (or to block or hinder at any stage). These are the process steps, such as blocking actions, undertaken by policy actors. Sometimes the actions involve discussion, negotiation, bargaining, persuading (by provision of evidence for example), and influencing (by offering incentives and rewards, legitimate or not legitimate). The interaction may be direct between advocate and decision maker or implementer, or indirect via other advocates, advisers or interested parties, or even less direct via influencers. Another form of indirect communication is where the EBRD facilitates communication among other policy actors (e.g. the private sector and government). Other types of policy actions may not involve communication at all - for example, the drafting of regulation/legislation and the conduct of research and analysis aimed at providing evidence-based advice.

2.1.5 Outputs

Outputs of the policy process are the tangible direct results of policy actions, such as a draft of legislation.

2.1.6 Outcomes

Outcomes of the policy process are the things that happen or don't happen as a result of the interplay among actors and their actions or inaction. Outcomes may be "no change" or various results - intended or unintended, positive or negative.

2.1.7 Context

The context in which the policy dialogue process takes place is influential, perhaps significantly so, on all the above elements. The context has both visible and less visible parts - for example, stated and
unstated objectives, official and unofficial (including corrupt and unfair) practices that are used for achieving the result. If these assumptions hold true then relating what happened in a particular policy dialogue process to what was going on in the wider environment may aid in understanding why things happened the way they did. When others find themselves in similar contexts facing similar issues, the experiences described in this evaluation may act as a useful source of ideas. It may also provide ideas on how the EBRD might customise its approach for greater effectiveness.

The framework for the evaluation of policy dialogue adopted for this study is shown in Figure 1.

Figure 1: Framework for evaluation of policy dialogue

2.2 Approach and methods

2.2.1 Methods

The subject and purpose of the evaluation lend themselves primarily to qualitative enquiry - the principal method will be that of case study investigation. However, a survey will be included to provide quantitative data. The main methods will include the following:

- Literature review
- Triangulation of findings with other studies
− Review and selection of context indicators (see below for more information)
− Interviews with policy actors
− Case studies (see below for more information)
− Surveys
− Analysis of media monitoring information
− Focus groups
− External peer review
  Two external peer reviewers will be retained to provide input and advice during conduct of the evaluation and comment on various iterations of the draft report.
− Wider presentation of findings

2.3 Case study selection

2.3.1 Approach

The EBRD’s portfolio in Ukraine is substantial and diversified. Being one of the largest foreign investors in the country, the Bank is providing funding for both private and public sectors, along with the technical cooperation and involvement in high-level policy dialogue on cross-cutting issues. In order to have an appropriate set of case studies with the potential for high relevance for the Ukrainian context and those of other EBRD countries of operation, a three staged approach was followed for selection:

− Initial data gathering and analysis – including a review of country portfolio and strategies (past and present), and discussions with sector teams in Headquarters and Regional Offices;
− Scoring sectors/themes against a set of criteria identified by the study team;
− Prioritising sectors, themes or topics based on the criteria and other considerations.
2.3.2 Sectors and themes

The following sectors were analysed as potential case studies: financial institutions, power and energy utilities, natural resources/gas, nuclear safety, transport infrastructure, municipal infrastructure, energy efficiency and renewable energy, agribusiness, manufacturing services, and property. The following themes or topics were also investigated as potential cases: anti-corruption initiative, local currency initiative, regional level policy dialogue, small business support, and legal transition programme.

2.3.3 Criteria

Each potential case was assessed against the following criteria:

- Depth of engagement – in order to be included in the evaluation study, sectors/themes should be characterised by an extensive policy dialogue over considerable period of time, whether successful or not.
- Public or private sectors – the selection of cases should ensure coverage of areas where EBRD's investment activity is directed to the private and public sectors.
- Territorial scale – at least one case should focus on municipal/regional government stakeholders.
- Potential for yielding useful insights – recognising that sector or theme cases may have wider applicability outside the particular sector or theme.
- Multilateral factor – some cases should demonstrate significant donor coordination.
- Volume of operations – generally, sectors chosen should have a significant portfolio of investments and the potential for this to continue.
- International dimension – cases where policy dialogue goes beyond the interests of EBRD and Ukraine and affects countries with strong political interests in the region.
- Degree of success – the aim was to include cases that provide both successful and, as yet, not successful outcomes.
### 2.3.4 Selecting sectors/themes/topics

Of the 11 cases meriting consideration, five cases were selected for in-depth investigation (with the local currency initiative topic merged into the financial institutions case). The team will maintain a watching brief on the very recent but high profile anti-corruption initiative given its importance across most sectors. The balance of four other deserving cases will be subject to a lighter analysis that aims to pick out particular aspects of interest, including those not covered by the other cases and/or where the evidence supports the main findings of the evaluation. The following will be the five main case studies:

<table>
<thead>
<tr>
<th>Sector</th>
<th>Public/Private</th>
<th>Territorial scale</th>
<th>Multilateral?</th>
<th>Volume of operations</th>
<th>International dimension</th>
<th>Degree of success</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agribusiness</td>
<td>Private</td>
<td>National</td>
<td>Yes</td>
<td>Medium</td>
<td>Yes (food security)</td>
<td>Positive</td>
</tr>
<tr>
<td>Energy efficiency and renewables</td>
<td>Both</td>
<td>Both</td>
<td>Yes</td>
<td>Large</td>
<td>Yes (energy security)</td>
<td>Positive (emerging)</td>
</tr>
<tr>
<td>Financial institutions (including local currency initiative)</td>
<td>Private</td>
<td>National</td>
<td>Yes</td>
<td>Large</td>
<td>-</td>
<td>Mixed</td>
</tr>
<tr>
<td>Regional engagement case</td>
<td>Both</td>
<td>Regional/municipal</td>
<td>Yes</td>
<td>Medium</td>
<td>-</td>
<td>Mixed</td>
</tr>
<tr>
<td>Power &amp; Energy</td>
<td>Public</td>
<td>National</td>
<td>Yes</td>
<td>Large</td>
<td>Yes (energy security)</td>
<td>Mixed</td>
</tr>
</tbody>
</table>

The following four cases will be looked at selectively:

<table>
<thead>
<tr>
<th>Sector</th>
<th>Public/Private</th>
<th>Territorial scale</th>
<th>Multilateral?</th>
<th>Volume of operations</th>
<th>International dimension</th>
<th>Degree of success</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transport infrastructure</td>
<td>Public</td>
<td>National</td>
<td>Medium</td>
<td>Yes (pan-European transport corridors)</td>
<td>Mixed</td>
<td></td>
</tr>
<tr>
<td>Nuclear safety</td>
<td>Public</td>
<td>National/International</td>
<td>Yes</td>
<td>Large</td>
<td>Yes (energy security/environmental sustainability)</td>
<td>Positive</td>
</tr>
<tr>
<td>Municipal infrastructure</td>
<td>Public</td>
<td>National</td>
<td>Yes</td>
<td>Medium</td>
<td>Yes (energy security)</td>
<td>Mixed</td>
</tr>
<tr>
<td>Natural resources (gas transportation system)</td>
<td>Public</td>
<td>National</td>
<td>Yes</td>
<td>Medium</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

A watching brief will be maintained on the anti-corruption initiative.

<table>
<thead>
<tr>
<th>Sector</th>
<th>Public/Private</th>
<th>Territorial scale</th>
<th>Multilateral?</th>
<th>Volume of operations</th>
<th>International dimension</th>
<th>Degree of success</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anti-corruption initiative</td>
<td>Public</td>
<td>National</td>
<td>Yes</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>
2.3.5 Context indicators

As outlined above, the context in which policy dialogue takes place is considered to be particularly influential. Accordingly, the study will use various data sources to characterise the country and/or sector context. Some datasets will apply to all cases in that they affect and reflect general conditions for policy dialogue while others will be more relevant to particular sector or thematic cases. Time series data and changes in cross country rankings over time will be used to illustrate changes in the context over time as well as to provide indicators of reform progress or lack of progress. The final selection of indicators will be made as the cases are elaborated.

Four types of data will be used:

− Statistical data (mainly from the EBRD, World Bank, other IFIs/donors, State Statistical Service of Ukraine, National Bank of Ukraine and other relevant government agencies) to provide an overview of the socio-economic situation of the country and situation in specific sectors and localities (for the regional case);

− Indexes and ranks to illustrate the position of Ukraine relative to other countries in areas relevant for the study;

− Empirical data that characterises the political actors in Ukraine, mainly based on the results of network analysis; and

− Other relevant assessments such as the Assessment of Transition Challenges that identify sector gaps for the country.

To date, 32 datasets have been reviewed for their suitability. Of these, 11 have been discounted for various reasons, for example because absence of time series data, less relevant or complete than similar datasets. Of the remaining 21 datasets, nine are economic series and statistics, 10 are indexes and two are other data types. Some of the indexes are particularly rich in terms of embedded indicators that make up the index. For example, unpacking the Global Competitiveness Index shows there are 12 "pillars" and 137 indicators covering the period 2006-2013. The Rule of Law Index is comprised of eight "factors" and 44 indicators though to date it only covers two years (2012-2013). The individual indicators provide a rich source of highly relevant measures of context.

The group of comparator countries includes Armenia, Azerbaijan, Belarus, Georgia, Moldova, Kazakhstan, Poland and Russia with the potential for expansion depending on the case.
2.4 Potential problems and limitations of the study

A frequently cited problem for the evaluation of policy dialogue is that of attribution. How can the changes observed be attributed to the EBRD? However, given the focus of this evaluation on process and learning, attributing results to a particular actor is not required. Cases have been selected where the EBRD has played a prominent role but as shown in the model adopted by this study, there are many actors and channels of influence. For this study it is more important to reveal the process within a particular set of circumstances that produces results than it is to attribute those results to a single actor.

3 Administrative arrangements

3.1 Team

The evaluation will be led by Keith Leonard, Senior Adviser Evaluation. Two consultants have been recruited; Olga Mrinska as Policy Consultant and Beatriz Perez-Timermans as Consultant Analyst.

3.2 Peer reviewers/advisory panel

External and internal peer reviewers will be used for this study. The External Peer Reviews are Philip Daltrop and George Abonyi and the Internal Peer Reviewer is Chris Olson.

3.3 Timetable

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Date (by week)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Study starts</td>
<td>February 2013</td>
</tr>
<tr>
<td>Consultants recruited</td>
<td>March 2013</td>
</tr>
<tr>
<td>Preliminary consultants within EBRD, data gathering and analysis, literature review, development of evaluative framework</td>
<td>March to April 2013</td>
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<tr>
<td>Preliminary field visit complete</td>
<td>April 2013</td>
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<tr>
<td>Approach paper approved</td>
<td>May 2013</td>
</tr>
<tr>
<td>Field work in Ukraine complete</td>
<td>July 2013</td>
</tr>
<tr>
<td>Draft report circulated to internal and external peer reviewers</td>
<td>August 2013</td>
</tr>
<tr>
<td>Draft cleared by CE for circulation Management Comments</td>
<td>September 2013</td>
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<tr>
<td>Final approved by Chief Evaluator</td>
<td>October 2013</td>
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<tr>
<td>Audit Committee Consideration</td>
<td>November 2013</td>
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<tr>
<td>Final distribution</td>
<td>December 2013</td>
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