



Using Participatory Statistics to Examine the Impact of Interventions to Eradicate Slavery: Lessons from the Field

Abstract This CDI Practice Paper by Pauline Oosterhoff, Sowmyaa Bharadwaj, Danny Burns, Aruna Mohan Raj, Rituu B. Nanda and Pradeep Narayanan reflects on the use of participatory statistics to assess the impact of interventions to eradicate slavery and bonded labour. It deals with: (1) the challenges of estimating changes in the magnitude of various forms of slavery; (2) the potential of combining participatory approaches with statistical principles to generate robust data for assessing impact of slavery eradication; and (3) the practical and ethical questions in relation to working with people living within a context of modern slavery. The paper draws lessons from the realities of using participatory statistics to support the evaluation of a slavery eradication programme in North India.

Background

Participatory statistics is a form of participatory research that is increasingly used in development research. Participatory research methods have long challenged top-down approaches to both development and knowledge production (Chambers 1997). At the heart of participatory research is the idea that local people can and should take an active and central role in the production and application of knowledge on development issues.

Within participatory research there is a wealth of studies on how local people can generate qualitative and quantitative data and analyse these as part of a reflective process that helps them to take action to improve their lives (Burns and Worsley 2015; Chambers 2007, 2008). Participatory statistics combines this open-ended, bottom-up approach of data generation and analysis with statistical principles. Although there is a paucity of literature on participatory statistics, the available research suggests that it can be an efficient way to enable local people to produce generalisable statistics. It has been successfully used for monitoring and evaluation (M&E) and can empower local people in a sphere of research

that has traditionally been 'highly extractive and externally controlled' (Holland 2013).

Participatory approaches to generating and analysing statistics are relevant for impact evaluation. They have the potential to provide two functions: (1) generating quantitative data to confirm attribution – thereby responding to accountability; and (2) generating internal learning relevant for the programme and giving a voice to programme beneficiaries.

In 2014, The Freedom Fund asked a group of researchers from the Institute of Development Studies (IDS) in the UK and Praxis-Institute for Participatory Practices in India to measure and understand the impact of slavery eradication programmes operating between 2014 and 2017, undertaken by 16 grass-roots non-governmental organisations (NGOs) in selected areas of 27 districts of Bihar and Uttar Pradesh. Similar work is currently being developed for Terai in Nepal and Tamil Nadu in South India.

Modern slavery can take many forms and there are many definitions. However, there is wide agreement among

The Freedom Fund and its partners that individuals in slavery are either paid nothing or paid below-subsistence wages; they cannot walk away and they are subjected to threats or violence. They are denied their freedoms; they are used, controlled and exploited by another person for commercial and personal gain.

Anti-slavery programmes are set in complex settings, beneficiaries are often difficult to identify, and it is difficult to measure impact because affected individuals are particularly vulnerable and are understandably often not forthcoming in providing information. Modern slaves come from specific populations originating from deprived locations, and work in low-skilled and labour-intensive industries. In India, for example, people belonging to lower castes in a few districts in Uttar Pradesh and Bihar are recruited to work in labour-intensive industries such as brick kilns and stone quarries. In Ghana, children from vulnerable extended families are sold into fishery operations in Lake Volta (Afenyadu 2008a, 2008b). Female migrant domestic workers from South Asia and Southeast Asia end up being severely exploited in Gulf States (Human Rights Watch 2014). In Nepal, members of low-caste households in Saptari district are working to pay back extremely high-interest loans in the local agricultural sector (Kumar, Subedi and Suwal 2013). Different kinds of slavery can co-exist within one region, enhancing the complexity of slavery eradication efforts.

Our research has taken place in a setting with several types of slavery. Each NGO in the programme has its own expertise and history covering a specific aspect and geographic area of modern slavery, covering adult and child bonded labour within communities, and trafficking (including into the sex industry). NGOs and their programmes differ in size but they all work on community-based interventions. Selection was based on their track record as well as site visits and references. They were assisted to plan their own work and targets according to their perception of the strategies most likely to bring about reductions in the form of slavery on which they focus. Most NGOs focused their programming at the level of the hamlet (a small settlement, generally smaller than a village). When we started the research, these hamlets were each thought to comprise around 100 households.

While individual NGOs have M&E systems to measure the progress of their intervention, our work aimed to assess the impact of interventions across The Freedom Fund's 'hotspots' – areas with high concentrations of modern-day slavery where the Fund supports eradication programmes (in this case, Bihar and Uttar Pradesh). The aim of each hotspot programme is: to reduce prevalence in the specific communities in which partners are working, through direct prevention, protection and prosecution interventions; to improve the wider enabling environment for freedom; to increase the capacity of civil society for sustained and

effective anti-slavery action; and to support rigorous research and evaluation on modern slavery.

We have used participatory statistics for a baseline and will use it for a follow-up survey to measure changes in prevalence of slavery and significant change in the programme areas. The follow-up survey will be carried out two-and-a-half years after the baseline. The definitions of slavery and the indicators of significant change used in the baseline survey were both developed through an open-ended participatory process of life storytelling. Randomly selected programme beneficiaries collected the data for the baseline and together analysed the results with a view to taking collective action. This approach allowed us to scale up decentralised, open-ended and action-oriented participatory processes involving beneficiaries and NGOs and to generate the data for a survey across the programme with sufficient statistical power. A participatory statistical method is different from a standard extractive statistical approach in that it can give people affected by slavery a voice about what should be counted, and give them a chance to input into how the survey results could be used for locally relevant action.

In this paper we will: (1) explain some of the key issues related to conducting baseline surveys to measure slavery; (2) elaborate on the different elements of the methods and reflect on which elements made it participatory, and which were more extractive; and (3) reflect on the practical and ethical questions in relation to working with people living within a context of modern slavery.

1 Key issues in baseline surveys to measure slavery

There is an increasing body of knowledge on modern slavery, as well as greater recognition of activists¹ and greater media attention.² Yet there is wide variation in current estimates of the number of people in slavery around the world. There are a number of technical, political and moral problems with conducting surveys to estimate the prevalence of slavery.

Slavery experts at the United Nations (UN), international NGOs, and researchers have described the challenges of estimating the number of people in various forms of slavery (De Cock 2007; Goździak and Collett 2005; Pitts *et al.* 2015). The International Labour Organization (ILO) estimates that 20.9 million persons are engaged in forced labour, but this estimate has a broad range and cannot be compared to earlier data collected by the same organisation (ILO 2012). This makes it hard to assess the impact of the interventions to eradicate slavery or of the countervailing systemic pressures that channel people into slavery between the first and second survey. This difficulty in measuring large-scale progress in turn affects the political will to take action.

The first major problem in estimating modern slavery using standard statistical approaches concerns the lack of universally agreed definitions. Definitions should reflect specific national or local contexts – including legal contexts – and this is what makes it difficult to compare results across different settings. Sometimes local definitions of slavery are conflated in national laws. The Immoral Traffic in Persons Act in India, for example, makes no distinction between sex work and trafficking. Some studies do not clearly distinguish between labour and sex trafficking (Farrell, McDevitt and Fahy 2010). Surveys and other studies that operationalise conflated definitions of sex work will probably find a high prevalence of trafficked sex workers and can result in poor programming that is difficult to evaluate. One example is ‘rehabilitation’ services for ‘trafficked’ sex workers in Cambodia who actually do such work by choice (Overs 2013).

The second problem is that slaves are a small minority of the total population of any country and are often hidden. National surveys aiming to measure the number of slaves among the total population would have to be very large to detect affected individuals (Pitts *et al.* 2015). Unless there are dramatic changes in prevalence, the sample needs to be very large to detect them.

The third problem is that it is not technically feasible to create a sample list to carry out a random sample for what is an invisible or hidden population of an unknown size. This is why many studies have used snowballing or other convenience samples or identified people through services. These studies have yielded important insights into many aspects of modern slavery, but are less helpful in assessing the impact of interventions to bring about reductions in prevalence. When we spoke with rescue and rehabilitation experts and rescued children in Bihar, they said that sometimes victims initially feel resentment upon being rescued. Rescuing can, for example, bring shame to the family, as they may be charged by the police. Families also fear retaliation by the perpetrators. While this fear and anger often diminish when victims spend time in rehabilitation, these dynamics explain why the number of victims who are in contact with authorities or NGOs may be just the tip of the iceberg. However, without evidence, one might also argue that these services and benefits encourage people to falsely present themselves as victims of modern slavery, which could lead to an inaccurate sample.

The fourth problem is that households in a survey area may fear that the researchers themselves will collaborate with police and other government authorities or with slave traders or moneylenders. When surveys are done by trained teams of data collectors from outside the communities, it is unlikely that team members will know how to identify and/or manage some of the ‘gate-keepers’ – including slave traders or moneylenders – in these communities. When people question the independence of the researcher, they are likely to under-report.

Finally, large-scale surveys are often not very useful for organisations that are working on slavery eradication projects. The data collection and analysis of large survey samples is costly and can take years. It also fails to take advantage of the scope of local residents to review the collected data together and highlight any likely errors, faulty data or misinterpretation of evidence, based on their local knowledge.

2 Combining participatory approaches with statistical principles: the case of measuring modern slavery

In order to overcome the challenges in measuring the impact of anti-slavery interventions described above, we combined participatory approaches with statistical principles. In this work we are trying to support participation at two levels – community level and grass-roots NGO level. Where local grass-roots NGO workers (many of whom live within these communities) collect and analyse the data, they are able to generate a real-time analysis by multiple participants that is far more participatory than a traditional academic qualitative analysis, which is taken away by a single researcher for a year to be coded and analysed.

In this section we summarise how we have implemented this approach. In so doing, we focus on four key elements: sampling, indicator development, development of a tool for data collection, and participatory analysis.

Sampling: developing inclusion and exclusion criteria

The Freedom Fund is supporting 16 NGOs to make a contribution to the eradication of slavery. Baseline and end-line surveys can help to detect changes in prevalence and other significant indicators of change in programme areas. As the NGOs and their interventions are dissimilar, we needed to define what we could and could not measure across the hotspot programme in Bihar and Uttar Pradesh. One criterion for inclusion was that the NGO had slavery-related Freedom Fund programme activities in hamlets during 2014 and 2015. We excluded from our baseline survey hamlets where the NGO had started work before the programme.

A central idea underpinning the programme is that slavery eradication has to come from within communities and that NGO activity should be designed to enable and facilitate this through collective action, including the work of Community Vigilance Committees. We therefore excluded hamlets where NGOs visited less than once a month and those that did not yet have a committee. The two NGOs that focused on sex work carried out their activities within red light districts. Under Indian law, sex work and trafficking are conflated and prevalence of sex work in these red light districts is directly affected by planning and zoning laws, which are outside the authority of the NGO. We therefore excluded 2 of the 16 NGOs, leaving 14.

Sampling: statistical power and sampling frame

We agreed that a sample should be large enough to detect big shifts within NGO programmes in the sample, such as a reduction from 7 per cent to 2 per cent. We agreed on a minimum of 270 households per NGO, which meant a total of 3,780 households.

Before we started, The Freedom Fund and NGOs had estimated that there were 100 households per hamlet. We thought that we would thus easily collect the total of 3,240 if we took data from 45 randomly sampled households in 72 hamlets. We made a sample frame of all the hamlets and allocated random numbers to each, divided among NGOs working in these hamlets. Making the sample frame list of the hamlet is a standard statistical process, but it required the participation of the NGOs, as the data were not available at the programme level. This process revealed important differences in the M&E capacities of NGOs. Some did not have a list of the hamlets, while others had already made detailed social maps of each hamlet for their programme.

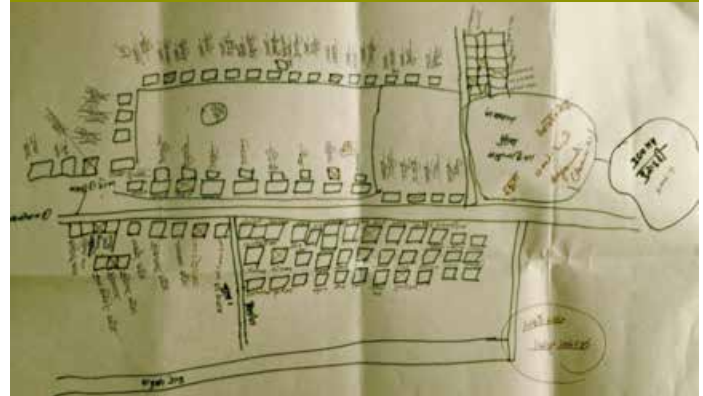
Once we had the sample frame list of the hamlets, we asked the NGOs to do a participatory social mapping together with local residents, essential services and civil society organisations (CSOs) of that hamlet. We learned that in many hamlets, people had left (voluntary or involuntary), which meant some hamlets had less than 30 households. Working in a participatory way with local people gave us a more accurate sample list of households than if we had taken a sample without doing participatory mapping. We excluded semi-deserted hamlets (<50 households) and reduced the number of households in smaller hamlets, increasing the sample list from 72 to 92.

In each hamlet, households were given numbers that were line-listed. NGOs randomly selected 15 households from the line-listed numbers or fewer if the hamlet had less than 100 households. A volunteer was recruited from these households. This person was trained to collect data about three households: their own and one adjacent neighbour on each side. People received training in a safe space – identified at the beginning in the social map – where they also discussed and validated the collective results.

Participatory definition and indicator development: working with life stories on definitions

To get working definitions of the forms of modern slavery, we applied a qualitative open-ended life story collection and analysis methodology (Burns and Worsley 2015). We trained staff from eight NGOs³ and community representatives in the funded programme to collect life stories from individuals living in contexts of slavery. In this open-ended participatory process, people living and working in communities ask others how they see their life trajectories and the alternatives. Life stories are not meant as final historic records of a person's life, but as a picture of how people now, in this context, see their lives and

Figure 1 Social mapping of households per hamlet



Source: Praxis.

why they are where they are. We asked these eight NGOs to collect a minimum of 352 stories. The purpose of the stories was to understand the systemic causes of slavery, identify where programmes should intervene, and what the indicators of a significant change would be according to individuals living in contexts of slavery.

In the past, some of these NGOs had collected stories from people about the changes in their lives due to the programme for advocacy purposes, and to understand the reasons for success; but we now wanted them to collect more open-ended stories. To avoid getting public relations (PR) stories or stories that only state reasons for success, we proposed to identify new respondents as much as possible. We agreed that most stories should come from the people directly affected by slavery in a household – 7 out of the 11 stories in each village. Interviewers were instructed to anonymise each story. We asked the interviewers to write down their reflections and observations about the context of the conversation and its effect on the quality of the interview. The NGOs collected 353 stories, which we used to develop the definitions of slavery for the baseline.

The largest group of respondents in slavery consisted of 73 male adults within communities, followed by 32 boys within communities and 28 parents of boys trafficked outside communities. The largest groups of people indirectly involved were women married to a husband in bonded labour and mothers of male children in bonded labour. Except for two NGOs that worked on trafficking of women and girls, none had collected data from girls.

Despite guidance in the story collection training that community representatives should also be trained to collect stories, in practice most were collected by local NGO fieldworkers. They explained this was due to the fact that an earthquake had just hit the region and they did not want to bother already overburdened community activists or leaders. It is also to some extent a contextual constraint as slaves, almost by definition, have limited time or freedom to engage in this type of process.

However, during the analysis it became clear to the NGO workers that the perspectives of community representatives would have been helpful to contextualise the findings. Guidance for the sister projects due to take place in Tamil Nadu and in Nepal (Terai) will be more assertive on this issue.

Furthermore, the added value of participatory statistical research has to be understood in the context of the action research groups generated by the process. These groups actively engage community participants in deepening inquiry and action around the critical issues identified in the first stage. As we discuss later, the participatory statistics process also involves community-level analysis of the numbers that are generated.

Participants made some reflections on the methodology. Some observed that the demographic profiles showed how a context of voluntary and involuntary migration of men and boys results in a predominantly female population remaining in the hamlets, effectively silencing girls, who are not allowed to talk to people outside the household and whose voice consequently is not heard. This method contributed to organisational internal learning about how gender relations and trust shape NGO staff encounters with beneficiaries and influence whose voices are counted. Based on their own experiences, the NGOs also understood why it was unlikely that survey teams with no knowledge or relation in a village would be able to identify slaves and measure prevalence. They reached agreement on the categories and definitions of slavery in the programme 'hotspot' and reflected on whether (and how) these relate to or differ from national or ILO definitions, which we used for the prevalence study.

For prevalence of slavery, we narrowed the categories of slavery down to four: (1) bonded labour of adults within the village; (2) bonded or trafficked adult labourer outside the village; (3) bonded child labour within the village; and (4) bonded or trafficked child labourer outside the village.

Participatory definition and indicator development: most relevant indicator of change

For the development of the most significant indicators of change in the baseline survey, we facilitated a joint analysis of the 353 life histories at a workshop. The eight NGOs worked in pairs, reading through life stories collected by others, and identified the main theme and the sub-themes in each of these individual stories. The most prevalent themes that emerged were illness (54), education (or the lack of it) (32), loans and advances (22), caste-based discrimination and violence (18), and deceit (15). None of the NGOs are working specifically on health, showing an important opportunity for significant change.

Participants then took these life stories over one and a half days to explore causal relations between these themes, creating a wall-wide system map using arrows and lines.

Figure 2 Example of an illustration of a question on land ownership on the question sheet



This map showed causal relationships and systemic feedback loops. The qualitative analysis of the pathways and indicators of change from the map and the clustered analysis generated three indicators of change over time and one diagnostic tool. Following the life stories exercise, we identified three indicators for repeated statistics: (1) prevalence and incidence of slavery and bonded labour; (2) collective action; and (3) access to health services. We also identified one indicator for diagnostic statistics – loan triggers.

Understanding the reasons why people take out loans is important for the development of timely and relevant interventions. Although The Freedom Fund and the Indian government support loan and saving schemes, these loans are too small to cover large expenses like marriages or emergency health care, leaving people vulnerable to exploitation by moneylenders.

Survey tool development

These definitions and indicators had to be operationalised into questions for a tool that people could use to collect the baseline survey data. For the data collection on prevalence and the most significant indicator of change at the household level, we developed sheets of paper with visuals and questions that respondents could mark so that the data could be counted, aggregated and analysed. We field-tested and fine-tuned the questions using participatory methods with the NGOs and local residents. This allowed us to get detailed input on the concepts and images of the tool to make it as accessible as possible.

Questions related to land ownership, for example (see Figure 2), needed to distinguish between owning or having a secure lease on the land on which people live (whether they have a secure house site) (left-hand side of Figure 2) and ownership of land for cultivation/livelihood (right-hand side of Figure 2). In an agricultural context with bonded labour, it is possible to be both a house owner and a bonded labourer working on somebody else's land. Having a secure lease on a house site is an important part of being able to assert one's rights against the slaveholder/landlord, who might otherwise arrange to evict the family (whether or not they are on the landlord's own land).

This is a context-specific way of measuring land ownership but these issues around the development of relevant and clear questions are not necessarily unique to participatory statistics.

Data collection and analysis process

Fifteen individuals from randomly selected households provided the information for the survey in a safe space facilitated by NGO staff. Respondents wrote the answers to the questions for themselves and their two adjacent neighbours on the sheets – one set of sheets per household, giving a total of three households per respondent. One advantage of this participatory method was that they could ask other hamlet residents for help entering the data. Respondents wanted to be sure they gave information that was factually and socially correct. Very few felt confident enough to fill out the form about their neighbours by themselves, without consulting others.

Gender and age relations also affected the participatory data collection and analysis process, with men and women each presenting different challenges for the NGOs collecting data. Women felt insecure giving information about finance and services, worried about getting their household into trouble by participating in the exercise, although they collaborated well in a group, checking information carefully and listening to critiques. Men felt secure with giving information, but appeared to be less happy being questioned.

When respondents had finished gathering the results on the prevalence of slavery, these were tallied up for group analysis and discussion on actions that could be taken at the hamlet level. Linking local research findings with a discussion on action by respondents is different from standard statistics. What is important in participatory statistics is not just that local people can collect data but that respondents can use the results to propose action. Respondents are also able to ask questions to the NGO, which provides them with an opportunity to discuss their programme activities.

3 The practical and ethical questions in relation to working with people living within a context of modern slavery

Confidentiality and anonymity are standard ingredients in ethical review processes of both participatory and standard research surveys. Modern slavery and risky loan-taking may be public secrets but are also sensitive. For a standard survey, one might be able to interview individuals separately – although this is always hard in a village because, almost without exception, people gather round. But in participatory group processes for collecting and analysing data, as we did here, anonymity and confidentiality cannot be guaranteed.

In almost every hamlet, NGO facilitators met with large crowds of people who perhaps thought they had come to collect data to make a list of beneficiaries for government or NGO schemes. Community members questioned the staff why their house was not selected as they felt they might be denied any service or scheme. Keeping people away required organised effort, and some people

kept lingering around hoping that perhaps this was an opportunity to get benefits.

Inviting people to share public knowledge about individuals provided a form of collective data quality control that standard surveys do not have. Unlike surveys conducted by external teams, respondents know the facilitators and can easily contact them afterwards. Yet they still feared the repercussions of sharing data for similar reasons as in standard surveys.

Caste differences can hinder participatory statistics perhaps more than standard surveys because people have to sit and work together. The survey contained hamlets with one caste as well as hamlets with several (low) castes. Some randomly selected individuals did not want to sit closely or work together with a member of a different caste.

One advantage of participatory statistics is that the facilitators can use the interaction – especially the discussions – as a way to build trust. Several NGOs reported that spending time with people during the process of generating participatory statistics helped them to build more trust, and that trust was needed to get respondents to report modern slavery. One NGO went ahead and collected data in many villages without piloting, and found no slaves and no risky loans. When questioned about this remarkable result, their first response was that there were slaves but that these had now all been rehabilitated due to the intervention. After probing and a discussion with the programme management team, it became clear that they did not yet have close relationships in these communities, which probably explained why respondents did not disclose a positive slavery status. After reflection on their engagement in the pilot, this NGO paid more attention to building trust and was subsequently able to find respondents that did disclose living in slavery.

The need to have already established some trust raises the issue of working with trusted partners to collect meaningful participatory data and how important trust is if NGOs are to collect correct data for a baseline survey in a new community. Trust could result in an increase in reported numbers of slaves. One might see an increase in reported levels of slavery within a project period in an area with low reporting due to low rapport in the beginning, but as people gain trust in the NGO they begin to open up, and the number of reported cases might rise.

Trust dynamics raise important issues about measuring a programme's impact within a two-and-a-half year duration in a context where actual reductions in prevalence might be expected to be relatively small. Any programme impact in terms of a decrease in prevalence might only be measurable after many years, and the intervention might actually lead to an increase in reported cases during the first few years.

NGO staff reported that through participatory statistics they learned a new way of working with communities, which

provided important feedback for improving their interventions as well as providing data for accountability purposes. They also reported that they started to get data on issues they did not know about, such as taking out large loans for marriage.

4 Conclusion

Useful insights emerged from applying participatory statistics as compared to standard statistical approaches for the collection of baseline survey data on modern slavery. The overall research process combines open-ended participatory elements such as life storytelling, mapping and a joint analysis of the data by the participants with standard statistical procedures such as the calculation of the number of households required for sufficient statistical power and the application of inclusion and exclusion criteria of hamlets based on existing lists. For many NGO staff, the use of open-ended life stories was a new and emotionally touching experience. Participatory mapping of randomly selected hamlets had particular advantages over standard statistical surveys for the creation of a sample frame at the hamlet level. It alerted us to the scope of rural migration and the need to increase the number of sites to get enough statistical power, but it also increased the time and budget required to collect the data. The collective analysis of life stories through mapping was new to all eight NGOs involved. It allowed them to visualise where their interventions were in relationship to the causes and trajectories of slavery. It built consensus about definitions of slavery and ways to measure significant change. Involving the NGOs in the data collection process prompted reflections among staff about inclusive programme design and trust-building.

Unlike survey teams of outsiders who have no relationship with local residents, we worked with partners who were

building long-term relationships with residents in the survey sites. Working with NGOs helped to gain access, but lack of trust was still an important challenge. The data were collected by local residents facilitated by NGOs. However, data collection in and of itself is not particularly participatory or empowering. The discussions at the end of the process enabled people to express their voice to NGOs, which does differ from a standard extractive statistical approach.

One of the main benefits of this process is quick feedback loops, but it is still time-consuming (5–6 months) and challenging for NGO field staff who are not yet used to combining participatory approaches with rigorous documentation. The NGOs also have other activities to carry out and may not understand the long-term impact of postponing data collection for a baseline survey. For some NGOs, the participatory exercises after the data collection led directly to the beneficiaries asking questions – prompting reflections among NGO field staff. But others needed to be reminded to hold these discussions. The extent to which beneficiary voices will be translated into programme-funded activities depends on the quality of that participatory process in the field and the power of the NGO field staff within the organisation, as well as timing. For research – participatory or otherwise – to be useful for NGO programming, the results have to be made available before (annual) activity planning and other strategic moments when decisions are made and resources are allocated. So timing is important. Despite the difficulties we encountered in developing and integrating new methods, and those encountered by local NGOs and communities in implementing a complex participatory research process, we can already see the benefits of participatory statistics for this programme and believe that they hold great promise for development research.

Notes

1 'Kailash Satyarthi – Facts', Nobel Peace Prize website, www.nobelprize.org/nobel_prizes/peace/laureates/2014/satyarthi-facts.html (accessed 16 December 2015).

- 2 'Modern-day slavery in focus – Qatar', www.theguardian.com/global-development/series/modern-day-slavery-in-focus+world/qatar (accessed 16 December 2015).
- 3 The eight NGOs were selected by the funder.

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- (2) Designing appropriate ways to assess the impact of complex interventions in challenging contexts.
- (3) Better understanding the political dynamics and other factors in the evaluation process, including the use of evaluation evidence.

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ISSN: 2053-0536
AG Level 2 Output ID: 327

