



Department of Performance Monitoring and Evaluation

Report on the Assessment of Government Evaluations

Pricing and Access to Consumer Credit: A review of the impact of the National Credit Act one year after its implementation

Date Evaluation was completed: June 2009

Name of assessor: Stephen Rule

Evaluation Number: 106

Date Assessment Completed: 22nd February 2013

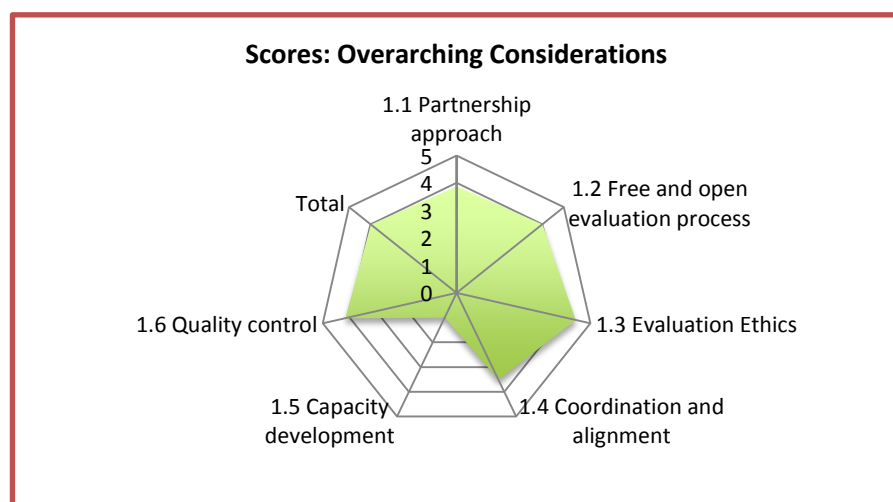
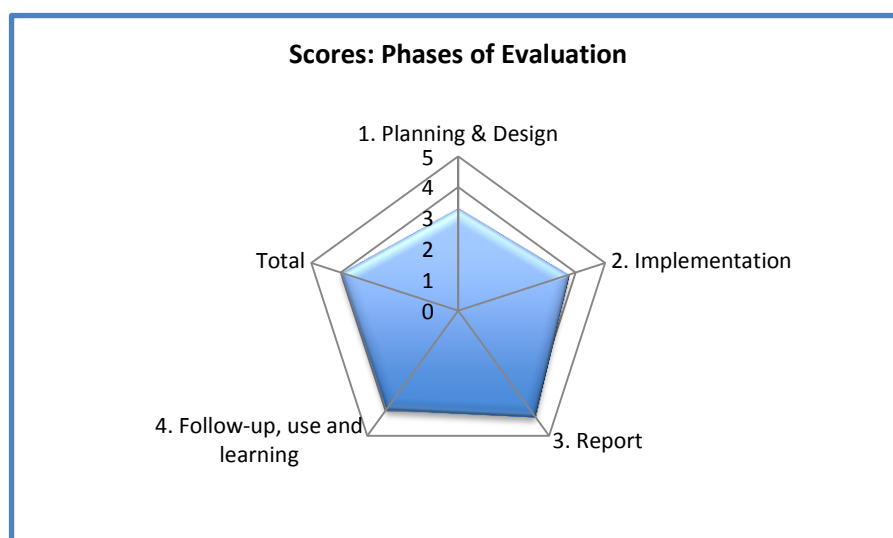
Evaluation Assessment Details

Title of evaluation report	Pricing and Access to Consumer Credit: A review of the impact of the National Credit Act one year after its implementation
Completion Date of Evaluation	June 2009
Name of Assessor	Stephen Rule
Evaluation Number	106
Completion Date of Assessment	22nd February 2013
Initiated by	National Credit Regulator
Evaluation undertaken by	Feasibility (Pty) Ltd
Evaluation area / sector	Financial
	Additional
National Outcome	Outcome 4
	Additional
Type of Evaluation	Economic
	Impact Additional
What is being evaluated	Impact of the National Credit Act after one year
	Additional
Geographic Scope	National
Period of Evaluation	Unknown
Known Cost of Evaluation	Unknown

Quality Assessment Scores

Phase of Evaluation	Score
Planning & Design	3.33
Implementation	3.78
Report	4.24
Follow-up, use and learning	3.95
Total	3.98

Overarching Consideration	Score
Partnership approach	3.88
Free and open evaluation process	4.00
Evaluation Ethics	4.44
Coordination and alignment	3.50
Capacity Development	1.00
Quality control	4.16



1. Planning & Design

1.1. Clarity of Purpose and Scope in TOR

STANDARD: *The evaluation was guided by a TOR with at least the following sections explicit: purpose, scope and objectives; expectations regarding design and methodology; resources and time allocated; reporting requirements; expectations regarding evaluation process and products.*

Comment and Analysis

The service provider indicated that the ToR provided clear guidance with respect to the goal, purpose, scope and timing of the project. Some reservations were expressed about the lack of time for full utilisation of the methodology appropriately.

Rating 4

STANDARD: *The purpose of the evaluation was clear and explicit in the TOR*

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: *The evaluation questions were clearly stated in the TOR and appropriate to addressing the evaluation purpose*

Comment and Analysis

Not applicable

Rating N/A

STANDARD: The approach and type of evaluation was suited to the purpose and scope of the evaluation TOR**Comment and Analysis**

Not applicable.

Rating N/A

STANDARD: Intended users and their information needs were identified in the TOR**Comment and Analysis**

Not applicable.

Rating N/A

STANDARD: Key stakeholders were involved in the scoping of the TOR and determining the purpose of the evaluation**Comment and Analysis**

Not applicable.

Rating N/A

1.2. Evaluation was adequately resourced

STANDARD: The evaluation was adequately resourced in terms of time allocated

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: The evaluation was adequately resourced in terms of original budget

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: The evaluation was adequately resourced in terms of staffing and skills sets

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: *Where appropriate, the evaluation planned to incorporate an element of capacity building of partners/staff responsible for the evaluand*

Comment and Analysis

Not applicable.

Rating N/A

1.3. Alignment to Policy Context and Background Literature

STANDARD: *There was evidence that a review of the relevant policy and programme environments had been conducted and used in the planning of the evaluation by the evaluators*

Comment and Analysis

The NCR was fully conversant with the credit policy environment and this insight was factored into the planning of the evaluation.

Rating 4

STANDARD: *There was evidence of a review of appropriate literature having been conducted and used in the planning of the evaluation by the evaluators*

Comment and Analysis

There was little evidence that additional appropriate literature had been consulted in the planning of the evaluation.

Rating 2

1.4. The evaluation methods planned were appropriate to the project

STANDARD: There was explicit reference to the intervention logic or the theory of change of the evaluand in the planning of the evaluation

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: Key stakeholders were consulted on the design and methodology of the evaluation

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: The planned methodology was appropriate to the questions being asked

Comment and Analysis

The methodology was appropriate but the time provided for its implementation was not adequate.

Rating 3

STANDARD: Planned sampling was appropriate and adequate given the focus and purpose of evaluation***Comment and Analysis***

The sampling was adequate but could have been supplemented with a larger number of Mystery Shoppers to enhance the price survey, had the budget been more generous.

Rating 3

STANDARD: There was a planned process for using the findings of the evaluation prior to undertaking the evaluation***Comment and Analysis***

This study was part of the NCR's ongoing research to determine levels of public awareness of the provisions of the NCA. As such, it informed their continual mandate.

Rating 4

1.5. Inception phase***STANDARD: The inception phase was used to develop a common agreement on how the evaluation would be implemented******Comment and Analysis***

Not applicable.

Rating N/A

2. Implementation

2.1. Ethical Review and Considerations

STANDARD: *Where data was gathered in contexts where ethical sensitivity is high, appropriate clearance was obtained through an ethics review board; e.g. in evaluation involving minors, institutions where access usually requires ethical or bureaucratic clearance, and situations where assurances of confidentiality was offered to participants*

Comment and Analysis

All participants were adequately protected by the coding of questionnaires and interviews. The enquiries made by Mystery Shoppers were removed from the credit bureaux databases with the agreement of the Credit Ombud. Only the names of the 60 companies or organisations that participated, were listed in the report.

Rating 4

2.2. Evaluator independence

STANDARD: *Where external, evaluation team was able to work freely without significant interference*

Comment and Analysis

The service provider was not subjected to any interference during the research process.

Rating 5

STANDARD: The evaluation team was impartial and there was no evidence of conflict of interest***Comment and Analysis***

The evaluation team appears to have been totally impartial and there is not any evidence that a conflict of interest might have occurred.

Rating 5

2.3. Key stakeholder involvement***STANDARD: Key stakeholders were consulted through a formalised mechanism or institutional arrangement during the evaluation******Comment and Analysis***

Some key stakeholders together with the NCR were presented with the draft report and their comments were noted and factored into the report where possible.

Rating 4

STANDARD: Where appropriate, an element of capacity building of partners responsible for the evaluand was incorporated into the evaluation***Comment and Analysis***

Evidence of capacity building could not be discerned in this project.

Rating 1

2.4. Methodology

STANDARD: The methods employed in the process of the evaluation were consistent with those planned

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: Data collection was not compromised by fieldwork-level problems or unplanned diversions from original intentions

Comment and Analysis

The gathering of data by means of Mystery Shopping and from Credit Providers was a time-consuming process resulting in an extension of six weeks to complete the project.

Rating 3

STANDARD: Forms of data gathering were appropriate given the scope of evaluation

Comment and Analysis

The data collection methods were appropriate for the evaluation. However, it emerged that when individuals shopped around for quotes, as did the Mystery Shoppers, they were flagged by the credit bureaux.

Rating 4

STANDARD: The data analysis approach and methods were appropriate and sufficient given the purposes of the evaluation

Comment and Analysis

The methods of analysis were trend analysis, a descriptive analysis of the credit industry, and computations of the total costs of credit on the basis of responses obtained in the survey. These methods were appropriate and sufficient.

Rating **5**

STANDARD: Key stakeholders were significantly engaged as part of the methodology

Comment and Analysis

Key stakeholders were requested to make inputs at a presentation of the draft report.

Rating **3**

STANDARD: The methodology included engaging beneficiaries appropriately as a key source of data and information

Comment and Analysis

Beneficiaries were engaged on the credit provider side by interviews and on the borrower side by proxies in the form of Mystery Shoppers.

Rating **4**

2.5. Project management

STANDARD: The evaluation was conducted without shifts to scheduled project milestones and timeframes

Comment and Analysis

Not applicable.

Rating N/A

3. Report

3.1. Report was well-structured and presentation was clear and complete in each of these areas

STANDARD: Executive summary captured key components of the report appropriately

Comment and Analysis

A fairly lengthy research report summary of 23 pages was effectively the executive summary of the larger comprehensive report, which was not in the public domain.

Rating 3

STANDARD: The context of the development intervention was explicit and presented as relevant to the evaluation

Comment and Analysis

The context of historically poor access to credit by lower LSM groups was very prominent in the evaluation.

Rating 5

STANDARD: There was a clear rationale for the evaluation questions**Comment and Analysis**

The rationale for the evaluation questions was directly derived from the NCR's mandate to monitor the implementation of the NCA, and it was clear.

Rating 5

STANDARD: The scope or focus of the evaluation was apparent in the report**Comment and Analysis**

Not applicable.

Rating N/A

STANDARD: A detailed methodology was outlined in the relevant section of a report (full report or 1/3/25) to the point that a reader could understand the data collection, analysis and interpretation**Comment and Analysis**

The methodological approaches utilised in the evaluation were clearly outlined in the report.

Rating 5

STANDARD: Key findings were presented in a clear way; they were made distinct from uncertain or speculative findings; and unused data was not presented in the body of the report

Comment and Analysis

The key findings were clear and they were interspersed with the empirical data pertaining to different forms of credit.

Rating 4

STANDARD: Conclusions and recommendations were clear and succinctly articulated

Comment and Analysis

Although the report was primarily empirical in nature, several conclusions and recommendations were compiled on the basis of the analysis of the empirical trends in access to different forms of credit.

Rating 4

STANDARD: Acknowledgement of limitations of all aspects of the methodology and findings were clearly and succinctly articulated

Comment and Analysis

The limitations of the Mystery Shopping sample was clearly acknowledged.

Rating 4

3.2. Writing and presentation

STANDARD: *Quality of writing and presentation was adequate for publication including: adequate layout and consistent formatting; complete sentences and no widespread grammatical or typographical errors; consistency of style and writing conventions (e.g. tense, perspective (first person, third person); levels of formality; references complete and consistent with cited references in reference list and vice versa; etc)*

Comment and Analysis

The quality of the report in terms of layout, grammar, style, consistency and references was good and worthy of publication.

Rating 5

STANDARD: *Appropriate conventions were used in presentation of data (e.g. use of appropriate statistical language; reporting of p-values where appropriate; not reporting statistically insignificant findings as significant; clarifying disaggregation categories in constructing percentages; not using quantitative language in reporting qualitative data, etc.)*

Comment and Analysis

Adherence was given to appropriate conventions in the presentation of data.

Rating 4

3.3. Presentation of findings

STANDARD: *The use of figures and tables was such that it supported communication and comprehension of results; and data reported in figures and tables was readily discernible and useful to a reader familiar with data presentation conventions*

Comment and Analysis

Thirteen figures and eight tables formed the basis of the text and analysis throughout the report, thereby enhancing the clarity thereof.

Rating 5

STANDARD: Data analysis appeared to have been well executed

Comment and Analysis

The data was consistently well analysed.

Rating 5

STANDARD: Findings were supported by available evidence

Comment and Analysis

The findings were supported by the evidence.

Rating 5

STANDARD: The evidence gathered was sufficiently and appropriately analysed to support the argument**Comment and Analysis**

The evidence gathered was sufficiently and appropriately analysed to support the argument.

Rating 4

STANDARD: There was appropriate recognition of the possibility of alternative interpretations**Comment and Analysis**

Recognition was given to potentially alternative interpretations of the trends in access to credit during the year following the implementation of the NCA.

Rating 4

STANDARD: The report appeared free of significant methodological and analytic flaws**Comment and Analysis**

No methodological or analytical flaws were evident in the report.

Rating 5

3.4. Conclusions

STANDARD: Conclusions were derived from evidence

Comment and Analysis

The conclusions were derived from the evidence.

Rating 4

STANDARD: Conclusions took into account relevant empirical and/or analytic work from related research studies and evaluations

Comment and Analysis

There was not much reference to other empirical work or research in the body of the available summary report. The unpublished full report was not published by the NCR.

Rating 2

STANDARD: Conclusions addressed the original evaluation purpose and questions

Comment and Analysis

The original evaluation question pertaining to implementation of the NCA, was addressed in the conclusions.

Rating 4

STANDARD: Conclusions were drawn with explicit reference to the intervention logic or theory of change**Comment and Analysis**

Not applicable.

Rating **N/A**

3.5. Recommendations***STANDARD: Recommendations were made in consultation with appropriate sectoral partners or experts*****Comment and Analysis**

Some input was obtained from key stakeholders at the time of presentation of a draft of the report.

Rating **3**

STANDARD: Recommendations were shaped following input or review by relevant government officials and other relevant stakeholders**Comment and Analysis**

The NCR made input into the recommendations.

Rating **4**

STANDARD: Recommendations were relevant to the policy context**Comment and Analysis**

The recommendations factored in the developmental context of the country.

Rating 4

STANDARD: Recommendations were targetted to a specific audience sufficiently - were specific, feasible, affordable and acceptable**Comment and Analysis**

The recommendations were targetted at the NCR, the organisation mandated to monitor the credit industry. The recommendations were specific, feasible and affordable from what can be determined.

Rating 4

3.6. Relevant limitations of the evaluation have been noted**STANDARD: Relevant limitations of the evaluation were noted****Comment and Analysis**

The limitations of the Mystery Shopping sample were appropriately noted as a limitation in the data collected.

Rating 4

3.7 Protection of participants and risk considerations

STANDARD: *The full report documented procedures intended to ensure confidentiality and to secure informed consent where this was needed (in some cases this is not needed - e.g. evaluation synthesis - in which case N/A should be recorded)*

Comment and Analysis

The full report could not be accessed and the comprehensive summary report does not explicitly document procedures to protect confidentiality of participants where required. Nevertheless, the service provider indicated that the individual confidentiality of respondents was ensured.

Rating 3

STANDARD: *There were no risks to participants in disseminating the original report on a public website*

Comment and Analysis

Risks to participants as a consequence of public dissemination of the report were minimal.

Rating 5

STANDARD: *There were no unfair risks to institutions in disseminating the original report on a public website*

Comment and Analysis

There were no unfair risks to the institutions that participated, only their organisational names were listed in the report.

Rating 5

4. Follow-up, use and learning

4.1. Presentation to stakeholders

STANDARD: *Results were presented to all relevant stakeholders*

Comment and Analysis

The results were made public on the internet. Presentations were made to the NCR and a few key stakeholders.

Rating 3

4.2. Resource utilisation

STANDARD: *The evaluation was completed within the planned timeframes*

Comment and Analysis

Not applicable.

Rating N/A

STANDARD: *The evaluation was completed within the agreed budget*

Comment and Analysis

Not applicable.

Rating N/A

4.3. Transparency

STANDARD: *The report was publicly available (website or otherwise published document), except where there were legitimate security concerns*

Comment and Analysis

The research summary report (but not the full report submitted to the NCR) was made available on the website as follows:

<http://www.ncr.org.za/publications/Pricing%20and%20Access%20Summary%20Cover%20June%202009.pdf>

Rating 4

4.4. Lessons learnt

STANDARD: *After completion of the evaluation, a reflective process was undertaken by staff responsible for the evaluation to reflect on what could be done to strengthen future evaluations*

Comment and Analysis

The specific convening of a reflective process appears not to have happened, however, the report findings were certainly factored into the programme of the NCR.

Rating 3

4.5. Symbolic and conceptual value

STANDARD: *The evaluation study was seen by interviewed stakeholders as having added significant symbolic value to the policy or programme (eg raised its profile)*

Comment and Analysis

The interviewed service provider indicated the value of the study by pointing out that the top 60 credit providers in the country participated, representative of more than 90% of all credit extended in the country.

Rating 4

STANDARD: The evaluation study was of conceptual value in understanding what has happened and possibly in shaping policy and practice

Comment and Analysis

The study was of conceptual value in enhancing public understanding of developments in the year subsequent to the implementation of the NCA and of modifications that were required thereafter.

Rating 4

4.6. Utilisation of findings and recommendations

STANDARD: There was clear evidence of instrumental use - that the recommendations of the evaluation were implemented to a significant extent

Comment and Analysis

The NCR consistently made use of its regularly commissioned research studies and impact evaluations. This instance appears not to have been an exception.

Rating 4

STANDARD: There was clear evidence that the evaluation has had a positive influence on the evaluand, its stakeholders and beneficiaries over the medium to long term

Comment and Analysis

There was a positive influence on the NCR in respect of its ongoing programme to enhance the credit environment in South Africa.

Rating 5

References

Feasibility (Pty) Ltd. June 2009. Pricing and Access to Consumer Credit: A review of the impact of the National Credit Act one year after its implementation, report for National Credit Regulator.

List of Interviewees

Lebogang Selibi, Media Relations Officer, National Credit Regulator, 0115542722, initial telephonic interview and feedback several weeks later about other reports; not feasible to wait several more weeks for feedback on this report.

Dr Penelope Hawkins, CE of Feasibility (Pty) Ltd, short interviews and completed electronic questionnaire, 11/2/2013 and 19/2/2013.