THE POLITICS OF EVALUATION IN CO-FINANCED PROJECTS: THE CASE OF THE SCOTTISH EXECUTIVE AND THE EVALUATION OF THE STRUCTURAL FUNDS

Delia M. Costân*

Abstract. *This paper combines an analysis of the different theories expressed in the literature in relation to the process of evaluation and their empirical application to the case of a project evaluation undertaken by the Scottish Executive. The evaluation undertaken by the Scottish Executive is analysed in the context of the various theories and hypotheses expressed in the evaluation literature. Insight into the activity undertaken by the Scottish Executive and access to primary documents used, was facilitated by the author's participation in a six week internship within the Structural Funds Division of the Scottish Executive. The analysis of the evaluation of the co-financed projects in Scotland revealed that the challenges to the process of evaluation in Scotland resulted in part from the existence of different understandings by the various stakeholders involved in the setting of the goals of the evaluation process. The author's findings on the application of Article 4 in Scotland are that the different interpretations of Article 4 come from the European Commissions' general approach to evaluation; 'the Scottish Executives' emphasis on meeting the absorption requirements of the Structural Funds and less on detailed evaluation, and the Programme Management Executives' focus on supporting the project beneficiaries and less on evaluating the projects.*

Keywords: *evaluation theories, EU Structural Funds, evaluation of co-financed projects, Scottish Executive*

1. Theories and hypotheses in the evaluation process

Evaluation is a process that has been practiced for a long time, but received the attention of scholars of social research rather recently. Originated in the United States of America (USA) and identified with the evaluation of "poverty programme" in the 60s, the evaluation research became the focus of the American scholars of social research, and generated debate in the literature and controversies between the different evaluation paradigms. The adoption of the evaluation practice and the development of an evaluation culture in Europe have to be seen gradually in correlation with the other tendencies emerging on the continent.

In the European countries, evaluation has roots in the reforms of the public sector in the United Kingdom (UK) in the 80s and the approach to the principle of "value for money" that created a new way

* **Delia M. Costân** is a Public Manager within the General Direction for Social Affairs and Child Protection, Timiş, Romania. MSc in European Public Policy within the Department of Government of Strathclyde University, Scotland, UK. (2007 – 2008). Areas of interest: European policy evaluation, European governance. E-mail: delia.costan@gmail.com

of thinking, where every penny had to be justified, and, therefore, more attention was concentrated on the efficiency of public service. The challenge of reducing public spending continued in most of the industrialized states, and emerged with the introduction of the New Public Management culture. The era of New Public Management was developed and its principles and rules were adopted by many other continental countries at the beginning of the 80s. One of the consequences was a growing attention to efficiency and, in relation to that, an approach to the practice of evaluation. Gradually, the reforms of the public sector in the Anglo Saxon countries and the increasing emphasis on efficiency in developing public policies lead to the adoption of evaluation culture in most European countries.

International organizations such as the European Union (EU) become the laboratory of new approaches to evaluation, especially through the development of the Structural Funds' policies, which expend a considerable amount of human and financial resources, and require monitoring and evaluation. Despite its relatively recent introduction in Europe, the evaluation research gained rapidly importance, and became the object of academic controversies and a source of challenges for practitioners.

Several paradigms have been developed in an attempt to explain what evaluation is or should be. As suggested by Patton (1997: 22), a simple brainstorming exercise reveals that evaluation can equal measurement, rating, standardization or comparison, but on deeper reflection, evaluating implies more than a process of measuring, observing, reporting, and, in the best case, interpreting and utilizing the results. Evaluation is increasingly associated with the allocation or cutting of funds, political pressure or support, changes in administration, changes in the careers of the administrators and the jobs of the programmes' staff and the learning process, etc. It could be argued that essentially evaluation is a concept that could be defined as determining "the worth, merit and value of something". (Scriven, 1991: 1)

But how evaluation should be undertaken? Who should be involved? What is the role of evaluation or which are the consequences of evaluation? These are only some of the questions that have drawn the attention of both scholars and practitioners in the field.

On one side of the evaluation paradigms is the rational analytical school, whose scholars state that there is one single reality where the goal of evaluation is to seek "the truth". The highest aspiration in the logical positivist tradition is to make statements about the world that are true, and, thereby, universally generalised. As a consequence, the evaluation research may contribute to the quality of the decision making process by providing a "true knowledge" and the "right" policy theory that will ensure that the "right" instruments are deployed in the "right manner" and efficiency in attaining the "desired objectives". (Peter van der Knaap, 2004: 27)

At the opposite side of the scale there is the responsive school, represented by Guba and Lincolns' (1989) constructivist evaluation. They contradict the existence of a unique reality, and therefore the scope of evaluation as the search for the "truth". In the responsive school tradition, the evaluation forms part of a continuous process driven by political and other interests that may be leading at best to some agreement on “images of realities”. In this vision, the process of evaluation implies taking into consideration the claims and interests of all stakeholders and the core characteristic of this paradigm is the emphasis on negotiation and consensus where “the evaluator must be the orchestrator of the negotiation process.” Guba and Lincoln (1989: 10)

Despite the controversy between the positivist and constructivist paradigms, both visions of evaluation, agree on the political nature of the process. While most of the scholars recognize that evaluations operate within political constraints and that evaluation research should be understood as inherently political, Taylor and Balloch go further and suggest that “evaluation itself is socially constructed and politically articulated” (2005: 1). The same political nature of the evaluation process is stressed by scholars from the realistic evaluation paradigm, such as Pawson and Tilley. They state that “the very act of engaging in evaluation constitutes a political statement” (2000: 11), while Guba and Lincoln argue that “to approach evaluation scientifically is to miss completely its fundamental social, political and value orientated character”.

Probably one of the scholars who mostly stressed the political nature of evaluation is Carol H. Weiss. When analyzing the evaluation process of the public policies she offered three reasons why should evaluation be considered a political act: programmes and politics are “creatures of political decisions” and evaluations implicitly judge those decisions, evaluations feed political decisions making and compete with other perspectives in the political process; evaluation is inherently political by its very nature because of the issues it address and the conclusion it reaches (1993: 94).

Among the various models of evaluation expressed in the literature, the approaches are given to goal setting generated controversies in the field as well. Two main theories received the attention of scholars from the social research area: goal based evaluation whose promoter is Tyler and goal free evaluation proposed by Scriven.

Credited as being the pioneer of goal based evaluation, Tyler (1942: 492) argues that setting clear objectives and goals is a precondition for evaluation. The traditional approach to goal setting in the evaluation process states that in order to have a valuable evaluation it is essential that the goals are clearly set so that the evaluator knows what to look for. Focusing on attainment of goals implies, on one hand, measurement of the achievement of the programme goals, whether the results are in accord with the goals and, on the other hand, whether the results are produced by the programme. (Vedung, 1997: 37) It has been argued that “if evaluators agree in anything, it is that programme objectives written in unambiguous terms are useful information for any evaluation study.” (Worthen and Sanders in Patton, 1997: 149) However, practitioners in the evaluation field have stated that this rarely happens in reality and that, most of the time, the goals of the programmes are ambiguous or the programme staff has unclear views about what are the goals of the programme.

The solution proposed by goal based evaluation theorists is focusing the process of evaluation on the goals of the programme. It is stated that the first step the evaluator has to do, is to clarify the objectives or goals of the programme, for playing what Patton calls a “goal clarification game”. (1997: 149) This might avoid the situations in which the programme staff will declare at the end of the evaluation process that this is not what they wanted to achieve. The measure of success is how well the goals initially stated have been met in the results of the programme. The goal based model of evaluation has for a long time been generally accepted in the literature. However, the critics of this model argue that by focusing on attainment of objectives, the goal based evaluation neglects the implied costs in terms of human resources, money and time. Moreover, by focusing on the goals initially established, the evaluator will neglect the unintended effects of the evaluation, which might be more relevant than the expected results. It could also be argued that sometimes goals can not be measured and therefore made the object of the evaluation.

The strongest critic of the goal based evaluation is Michael Scriven. He proposes the goal free evaluation as an alternative to the goal based evaluation. The solution proposed by Scriven implies “gathering data on the actual effects and evaluating the importance of these effects in meeting demonstrated needs”. (in Patton, 1997: 181) By focusing on what was actually obtained and not on trying to find out what was initially settled as a goal or what the programme is trying to do, Scriven offers four reasons for choosing a goal free or what he also calls, needs based evaluation. He states that this model of evaluation avoids the risk of missing unanticipated outcomes, removes the negative connotations of the language from “unanticipated effects”, “side effects” or “secondary effects” that sometimes might well be the crucial achievement of the programme. Moreover, needs-based evaluation eliminates the perceptual biases introduced into an evaluation by the knowledge of the goals, and maintains the independence and objectivity of the evaluator through a goal free evaluation. (Scriven, in Patton, 1997: 181) The importance of the stakeholders and the utilization of evaluation results are also stressed by Scriven, who argues that “evaluations exist to make value judgements on whether the programme was of use to its stakeholders.” (McCoy and Hargie, 1996: 3)

The goal based theories bring in to attention the approaches given in the literature to the goal setting and the problems encountered in practice. It has been argued that practitioners have to deal with the ambiguity of the goals for what regards both the programme goals, and the evaluation goals. The question that may rise in this context is why are goals left ambiguous? It has been argued that one of the reasons that may explain the ambiguity of the programme goals is that the programme staff will describe large objectives in order to ensure funding. Patton (1997: 153) stated that “fuzzy goals may be a conscious strategy for avoiding an outbreak of goals wars among competing and conflicting interests.” On the other hand, it could also be argued that, stating general and ambiguous goals could be the consequence of failure to meet the diversity of evaluation processes. This explanation is suggested by Stame, who argues that by stating “general goals”, the European Commission found “a way of coping with the complexity of reality and of allowing each context to fully exploit its own abilities to move toward the accomplishment of global goals”. (2004: 70)

Some other reasons have been expressed in the literature regarding the ambiguity of programme goals. Nay (in McCoy and Hargie, 2001: 7) states that "there is generally no reward for practitioners, defining measurable objectives in hard work, increases the risks and promises no obvious professional reward for success", while Shadish (in McCoy and Hargie, 2001: 7) claimed that vague formulation of goals allowed organisations to make themselves "immune" to negative evaluations.

Evaluation, as it is being undertaken at EU level, has raised many questions in relation to who sets the goals in evaluation, who is responsible for their implementation or the different models of evaluation that exist within the Member States. The next section offers a brief overview of the development of evaluation practice and culture in the EU and a case study that focuses on the evaluation at the level of the co-financed projects. The case study selected allows theoretical insights reviewed in this chapter to be tested against empirical evidence of evaluation in practice.

2. Evaluation in the European Union

2.1. General background

Evaluation in the EU is identified, in large part, with the evaluation of the Structural Funds. It is agreed that what prepared the emergence of an evaluation culture at the European level is the development of the European Structural Funds, which involve a significant expenditure of both financial and human resources which requires monitoring and evaluation. (Toulemonde, 2000: 9) Different trends in the evaluation research within the continent or the EU have led to the development of the current evaluation regime for the Structural Funds. It has been argued that the increasing budget attached to the Structural Funds after the Treaty of Amsterdam, the emphasis on efficiency coming from the UK's principles of "value for money" in the 80s, as well as the rise of the "New Public Management" agenda, contributed to the development of the evaluation practice and culture of the Structural Funds.

Moreover, the accession of more Member States to the European Union has raised concerns amongst richer countries about the way money is being spent, and highlighted the importance of efficiency and of the instruments of control and evaluation. The admission of ten new Member States in the EU in 2004 brought a better monitoring and evaluation of the Structural Funds to the centre of attention of the Member States' governments and of the European Commission and required new approaches to the instruments of financial control and the way money is being allocated within the regional policy.

The evaluation of the Structural Funds has to be integrated into the whole picture of the events that have marked the EU history in general and the perspectives given to the process of evaluation in particular. The reforms of the Structural Funds describe a process of gradual decentralization of the responsibility for evaluation from the European Commission to the sub national authorities of the Member States.

The reforms of the Structural Funds brought changes to the practice of evaluation as well. It has been argued that before the 1988 Reform of the Structural Funds the evaluation had a low profile in the EU. (Toulemonde, 2000: 9) Some approaches to evaluation were evident in the UK, along with the adoption of the principles of the New

Public Management and the stress on efficiency and the principle of "value for money". The new emphasis on efficiency, which required a better evaluation of the money spent, was soon adopted by other European countries. One of the events that marked the introduction of systematic evaluation of the Structural Funds was the signing of the Single European Act in 1987, when the funds allocated for the regional policies were doubled. The 1988 Reform followed the signing of the Single European Act and one of its consequences was that the Member States became more concerned about the way the money was being spent. For example, the first strong reference to effectiveness was contained in this document. The adoption of the New Public Management vision together with the concern of the main contributors to the European budget, led to a more systematic approach within the EU to the principles of sound financial management of the Structural Funds.

The annual reports of the European Court of Auditors also pointed out the necessity of a more rigorous financial control and a better evaluation. The 1988 Reform of the Structural Funds made evaluation a mandatory instrument in the management of the structural funds. At the same time Toulemonde (2000: 4) suggests that evaluation was not put into practice because the Structural Funds were managed by means of co-financed programmes, and an evaluation culture was foreign to most of the Member States. However, the 1988 Reform marked two important events that affected the development of evaluation culture in the EU: the enhancement of the Structural Funds to be allocated, and the requirement of evaluation as mandatory.

The 1993 Reform of the Structural Funds followed the signing the Treaty of Maastricht. The Commission stressed much more on the need for national and regional authorities to comply with the EU provisions on evaluation. Pollack M. states that the 1993 Reform represented a "renationalisation of the policy sector", arguing that the changes introduced were the result of central governments reasserting their control over the day-to-day operation of the policy sector. (in Sutcliff, 2000: 298) The 1993 Reform of the Structural Funds meant essentially the reassertion of the national governments over the structural policy. It could be stated that in the context of the new Members States that joined the EU, which became further the main candidates to Structural Funds, the richer countries stressed the importance of better instruments for evaluation.

The 1999 Reform that brought the present regulations on Structural Funds and the approach taken to evaluation on this occasion could also be seen in the framework of the signing of the Treaty of Amsterdam and the adoption of the Agenda 2000 package. It is accepted that that the new Regulations on the Structural Funds reduced to some extent the Commissions' role in the management and monitoring of the Structural Funds programmes, by leaving to the Member States the interpretation of the legal provisions. For instance, the EC Regulation No 1260/1999 states in relation to the financial control in Article 38, that "the Member States shall take the responsibility in the first instance for the financial control of assistance".

The EC Regulation No 1260/1999 shows a development towards a more strategic management of the Structural Funds. A strong emphasis on results, as compared to the rules and the decentralization of responsibility for attaining them are completed by stronger feedback instruments, particularly evaluation. The scope of financial control is "to ensure that Community funds are being used efficiently and correctly", and that the funds "are used in accordance with the principles of sound financial management." (Reg 1260/1999, Art 38) The legal frameworks of the 1999 Reform, as well as the provisions contained in the Agenda 2000, stressed the responsibilities of the Member States in evaluating the Structural Funds.

The EC Regulation No 438/2001 was issued with the purpose of bringing new emphasis on the responsibilities that the Member States have in the process of evaluation. The Regulation points out again the role of the sub national authorities in the management of the Structural Funds. In Article 2 it is stated that: "Each Member State shall ensure that managing and paying authorities and intermediate bodies receive adequate guidance on the provision of management and control systems necessary to ensure the sound financial management of the Structural Funds in accordance with generally accepted principles and standards, and in particularly to provide adequate assurance of the correctness, regularity and eligibility of claims on Community assistance." (Article 2 of EC Regulation 438/2001)

It could be stated that the present legal framework for the evaluation of the Structural Funds offers general provisions in relation to the management of the Structural Funds and the process of evaluation, but leaves to the Member States the liberty of interpretation and implementation. Due to their degree of generality, the application of the EC Regulations on Structural Funds within the Member States resulted in different interpretations and applications, in accordance with the diversity of the institutional settings and the evaluation practice and culture in place or not in each of the Member States.

As a consequence of the diverse outcomes of the evaluations in the Member States and the difficulty in analysing these results in a meaningful manner, in April 2006 the European Commission issued a Working Document concerning good practices in relation to management verifications to be carried out by Member States on projects co-financed within Cohesion Fund. The Working document specifies that it was issued with the scope of disseminating good practices in relation to the management of the Structural Funds on the basis of Article 4 of Commission Regulation No 438/2001 and Article 4 of Commission Regulation No 1386/2001. The document emphasises the diversity of the institutional settings of the Member States and the impossibility of covering all aspects when it comes to the Article 4 checks. It is stated that "Commission audit missions carried out since the introduction of the abovementioned regulations (EC Reg. No 438/2001 and EC Reg. No 1386/2001) and also in the context of the accession of the ten new Member States have highlighted the diversity of methods and procedures for carrying out management verifications". (Working document, 2006:1)

It could be stated that the results of the evaluation made so far by the Member States, due to the diversity of evaluation models and cultures, made a centralization and utilization of the results difficult. Therefore, the European Commission finds itself in the situation of recommending the Member States to converge towards a uniform model of evaluation by suggesting some examples of good practices. However, the Working Document does not bring other input besides the specification on the evaluation practices to be adopted, and still leaves to the Member States the choice of interpreting and implementing the legal provisions on the practice of evaluation. The nominally framework was left to the Member States, but Commission has to then try to offer best practice by producing a Working Document so that evaluation results can be made useful.

This appears to be a classic case of ambiguous goals resulting from the unwillingness of stakeholders to agree on a single framework or what Patton calls "fuzzy goals" (1997: 153). The consequence of the lack of clarity when it comes to responsibility, and the emergent "fuzzy goals" had implications for the functioning and utility of the evaluation process as in the case study of Article 4 checks in the Scottish Executive exemplifies.

2.2 The case of the Scottish Executive

The evaluation of the Structural Funds starts with the evaluation of the single co-financed project. The focus of this chapter is on the Article 4 checks of the EC Regulation No 438/2001 laying down detailed rules for the implementation of Council Regulation (EC) No 1260/1999 as regards the management and control systems for assistance granted under the Structural Funds and the way these provisions have been interpreted and applied in Scotland since the adoption of the regulation until the present time.

Article 4 of the Commission Regulation No 438/2001 states that:

"Management and control systems shall include procedures to verify the delivery of the products and services co-financed and the reality of expenditure claimed and to ensure compliance with the terms of the relevant Commission decision under Article 28 of Regulation (EC) No 1260/1999 and with applicable national and Community rules on, in particular, the eligibility of expenditure for support from the Structural Funds under the assistance concerned, public procurement, State aid (including the rules on the cumulations of aid), protection of the environment and equality of opportunity. The procedures shall require the recording of verifications of individual operations on the spot. The records shall state the work done, the results of the verification and the measures taken in respect of discrepancies. Where any physical or administrative verifications are not exhaustive, but performed on a sample of operations, the records shall identify the operations selected and describe the sampling method."

The Article 4 checks have been carried out by the Member States since 2001, since when the EU Regulation No 438 was put into practice. Since no further recommendations for the development of Article 4 checks were initially given by the European Commission; the Scottish Executive developed Article 4 checks according to its own interpretation. The application of Article 4 has been subject to several audit missions from Directorate General for Regional Policy (DG Regio) and its reports have identified deficiencies in the Article 4 checks undertaken by the Scottish Executive, and made overtime some recommendations for improvement and compliance.

The evaluation on the basis of Article 4, as stated in the EC Regulation No 438/2001, and as it has been undertaken by the Scottish Executive, as well as the negative findings of the Audit mission, raise questions about who sets the goals in the evaluation process. Similar questions arise in relation to the consequences or unintended effects of the changing of the evaluation goals.

The diversity of the evaluation methods in the Member States caused the European Commission to issue a Working document concerning good practice in relation to management verifications to be carried out by Members States on projects co-financed by the Structural Funds and Cohesion Fund in April 2006. Besides bringing some examples of good practices in relation to Article 4 checks, the Working document issued in 2006 identified the diversity of methods of evaluation within the Member States and the consequent difficulty in assessing and utilizing these results. In the Working document the European Commission states: "Commission audit missions carried out since the introduction of the abovementioned regulations and also in the context of the accession of the ten new Member States have highlighted the diversity of methods and procedures for carrying out management verifications." At the same time, it is stated that negative findings in relation to Article 4 checks identified in other Member States required the issuing of this document with the purpose of offering examples of good practice to the Member States.

The Scottish Executive holds, as the Managing Authority, the responsibility for the compliance with Article 4 provisions in Scotland. According to the legal provisions, the Managing Authority has the possibility of delegating some of its responsibilities to intermediate bodies, but still retaining the responsibility for the outcomes of Article 4 checks. The same provision was emphasized in 2006 within the Working document, where it is stated that "Article 4 verifications are essentially a responsibility of the managing authority, which has the possibility of delegating tasks to intermediate bodies". Since 2001, the Article 4 checks have been delegated by the Scottish Executive to intermediate bodies, called Programme Management Executives (PMEs), which are being held accountable to the Scottish Executive, while, however, having their financial support assured by a board of partners. These conditions have the value of stressing the independence of the PMEs from the Scottish Executive, but, on the other hand, raise controversies when it comes to the independence of the PMEs from the partners who not only assure the financial support of the PMEs, but are also beneficiaries of the PMEs services and beneficiaries of the Structural Funds.

According to the members of the SF Division, the negative results of the Audit Reports in relation to the Article 4 checks could have a double explanation. On one hand, since 2001, the European Commission emphasized the absorption requirements in relation to the Structural Funds, and the necessity of focusing human and financial efforts on the absorption of the Structural Funds. The Article 4 checks had a secondary importance. In the Report issued in July 2007 to DG Regio, the Scottish Executive stated: "The early years of the 2000 - 2006 programmes had focused on the development of innovative projects and the achievement of N + 2 spending target. We now accept that monitoring activity was not given a high enough priority at that time. This is an issue that we will address in our workflow planning for the new programmes. Monitoring plans were approved in 2001 which involved a less intense programme of Article 4 visits than has now been agreed."

However, members of the SF Division stated that the Scottish Executive has issued guidelines and recommendation to the PMEs in relation to the Article 4 checks since 2001, but they also admit that, following the Commission's perspective, they also stressed more heavily the PMEs' role in supporting the project beneficiaries, and put less emphasis on their role as evaluators. The representatives from PMEs also declared that over time the PMEs have seen themselves more as supporting the projects' beneficiaries, than as evaluators of the projects. They stated that after the Operating Agreement, their role doubled from being not only the body that offered support to the project beneficiaries, but also as one of performing an audit function. This matter seems to be subject of controversy between the Scottish Executive and the PMEs since the SF Division members argue that this has always been the PMEs' role of both offering support to the project beneficiaries, and of evaluating the projects. Another controversy raised also in relation to the negative findings of the Audit Reports of the DG Regio that mentioned several times that the PMEs have to adhere to the Scottish Executive's rules.

This non compliance of the PMEs was explained by the SF Division members as being due to the fact that the PMEs' source of funding is assured by a board of partners, which is likely to lead to a close attachment to these partners who are also the beneficiaries of the projects, and less to the compliance with the Scottish Executive rules, despite their accountability to the latter.

3. Evaluation theories and practice

To reassert, the aim of this paper is to provide a better understanding of the nature and challenges that the process of evaluation implies by combining the knowledge offered by a review of the theories expressed in the social research field with the practice of evaluation as it is been undertaken within the Scottish Executive. The focus of this paper on the Article 4 checks of the EC Regulation No 438/2001 brings the hypotheses expressed in the evaluation research into the empirical context of the practical evaluation of co-financed projects and reveals the challenges faced in the practice of evaluation at the project level.

The European Commission' requirements contained in Article 4 present a high degree of generality, while the interpretation and implementation of the legal provisions are left to the sub national authorities of the Member States, to the Scottish Executive in this case. The generality of the goals stated by the European Commission in the evaluation process could be seen through the concept of "fuzzy goals" introduced by Patton, who argued that stating general goals may be a strategy of dealing with contradictory and maybe conflicting interests of the various stakeholders in the evaluation process (1997: 153). The difficulty in reaching an agreement between the Members States in relation to a model of evaluation that could fit all the European countries, might have led to Commissions' decision of issuing general provisions, and leaving the content of Article 4 to the interpretation of each of the Member States, and, therefore, to the adoption of a solution of ambiguous goals in the evaluation process as stated in the European regulations.

This approach is largely consistent with the argument that stating an evaluation model that could fit all Member States is a difficult, if not an impossible task, due to the diversity of the institutional settings of the Member States, and also to the different cultures of evaluation or the lack of an evaluation practice in some of the Member States. As stated before, it has been argued in the literature Toulemonde (2000: 9) that in some of the Member States the Structural Funds policies and the requirements of evaluation have constituted the reason for approaching an evaluation practice in the first place. As a consequence, the presentation of the evaluation goals in general terms might represent the Commission's attempt to cope with the diversity of institutional settings and cultures within the Member States. (Stame, 2004: 70)

The interpretation of the Article 4 by the Scottish Executive comes from the general character of the legal provision contained in this article. The freedom to choose the model of evaluation is seen not as an advantage, but as a result of the ambiguous goals coming from the European Commission. The Scottish Executive, indeed, highlights the fact that the European Commission changed the interpretation of Article 4 over time. It is argued that initially the focus was on supporting the project sponsor in the development of the projects and not on detailed verification. Changing the interpretation of Article 4 and, as a consequence, the evaluation goals, has required the Scottish Executive to adapt its evaluation model in relation with the Article 4 checks, and has required a continuous and ongoing effort to comply with the European Commission requirements in relation to the evaluation of co-financed projects.

The third perspective is that of the Programme Management Executives which argue that from being initially a body supporting the project beneficiaries, their role changed over time, and they became more of an audit body which follows the signing of the Operating Agreement. A member of one of the PMEs stated: "At the beginning of this Programme, Scottish Executive guidance clearly stated that Article 4 Monitoring Visits were not audits. The visits were designed to provide 'pastoral care' to project sponsors and to give an indication that systems and procedures were in place to insure compliance with European Regulations. The visits are now considered to be mini-audits and to be similar to the monitoring activity undertaken by the Scottish Executive under Article 10."

The approach given to Article 4 by the Programme Management Executives brings into discussion the paradigms expressed in the literature in relation to the role of the evaluator. The constructivist vision of evaluation through Guba and Lincoln's model of evaluation (1989) sees the evaluator not as a judge, but as a facilitator of the judgement and of the decision making process. It could be stated that, by developing their initial roles, the Programme Management Executives were acting more as negotiators for the stakeholder's interests and less as a judge in the evaluation process.

However, the role of negotiators played by the Programme Management Executives in the evaluation process and the nature of the financial support of the Programme Management Executives also reveals that the relationship created between the Programme Management Executives, and the project beneficiaries risks the emergence of what Stake called the "cosy managerial relationship". (in Guba and Lincoln. (1989: 230) Although accountable to the Scottish Executive, the financial support of the Programme Management Executives is assured by those who are required to evaluate, and this puts them in a delicate position.

An analysis of the Programme Management Executives' position in the evaluation process could lead to the interpretation that their approach to evaluation embraces the goal free model of evaluation suggested by Scriven (in Patton, 1997: 181) as compared with the Scottish Executive and European Commission perspectives and the stress on goal achievement in the evaluation process. The same interpretation could be given in relation to the new checking form, issued by the Scottish Executive in May 2007, as part of the Action Plan and which has been criticized by one of the Programme Management Executives as not addressing the relevant questions in relation to the "success" of the project that might come from unintended effects, but focusing merely on the accomplishment of the initially declared goals, and misses valuable information.

By stressing the importance of the overall goals the approach given by the Scottish Executive to evaluation is closer to Tyler's model of evaluation (1942) and the emphasis on the achievement of the goals set. However, this model of evaluation has proved to have some shortcomings, not least that stating clear objectives for the process of evaluation neglects the costs of human resources, time and money and neglects the unintended effects that sometimes have a bigger impact than the goals initially established.

4. Conclusion

My findings in relation to the evaluation of the co-financed projects in Scotland are that the application of Article 4 has generated different evaluation goals as a consequence of different interpretation of the same legal provision. The interpretation and application of Article 4 are seen differently at the three levels taken into consideration in this paper: the European Commission as the body that issued the guidelines on the application of the regulation, the Scottish Executive as the sub national authority that implemented the legal provision, and the Programme Management Executives as the actual evaluators of the co-financed projects on the basis of Article 4. Three different approaches to evaluation were identified and my findings showed that the existence of different evaluation goals in the process of evaluation of co-financed projects, led to some negative consequences for all the stakeholders involved.

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