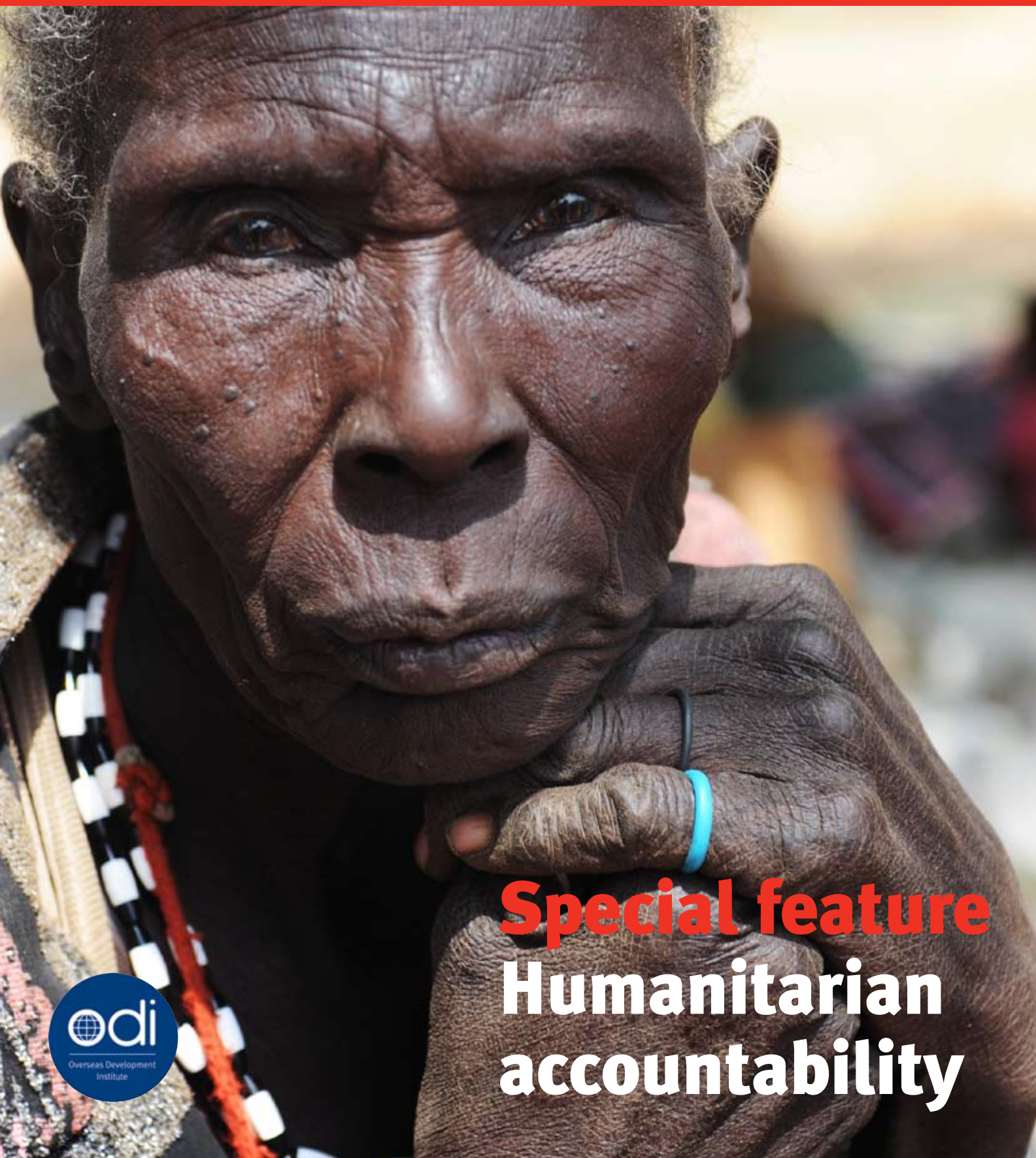


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About HPN

The Humanitarian Practice Network at the Overseas Development Institute is an independent forum where field workers, managers and policymakers in the humanitarian sector share information, analysis and experience. The views and opinions expressed in HPN's publications do not necessarily state or reflect those of the Humanitarian Policy Group or the Overseas Development Institute.

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Editorial



American Red Cross/Talia Frenkel

Welcome to the new-look *Humanitarian Exchange*! This edition, co-edited with ALNAP's John Mitchell and Paul Knox-Clarke, is dedicated to accountability in humanitarian action. In their overview article our co-editors reflect on the underlying rationales – both moral and practical – we use to justify our commitments to improving accountability, and whether our understanding of accountability has changed in the decade since the 'accountability revolution' last featured in *Humanitarian Exchange*.

One of the areas in which little has been achieved so far is in relation to collective accountability. In their articles Andy Featherstone and Gwyn Lewis and Brian Lander analyse the 'collective accountability deficit', outlining the IASC principals' commitments and plans and calling for a step-change in how the diverse elements of the humanitarian system account to each other. Riccardo Polastro explores the role of Real-Time Evaluations in improving humanitarian response, and Charles-Antoine Hofmann looks at the difficult question of NGO certification. Jonathan Potter highlights the importance of human resources management policies and practices in demonstrating accountability to an agency's staff. Margie Buchanan-Smith looks at humanitarian leadership and accountability, while Corinna Kreidler examines the role of donors in enhancing quality and accountability. Accountability frameworks and systems are explored in articles by Annie Devonport and Cait Turvey Roe, Mike Wisheart and Amy Cavender and David Bainbridge. Jérôme Larché argues the need for NGOs to adopt proactive and transparent approaches to dealing with corruption, while an article by the IASC Task Force on Protection from Sexual Exploitation and Abuse looks at the sensitive subject of sexual abuse by UN and NGO personnel. Imogen Wall and Gregory Glead present case examples of communications and local perspectives of the Haiti emergency response, and the issue concludes with an article by Karen Beattie looking at NGO accountability in South Sudan.

Reflections on the accountability revolution

Paul Knox-Clarke and John Mitchell, ALNAP

In 2003 HPN published an edition of *Humanitarian Exchange* focused on humanitarian accountability, to assess what was known at the time as the ‘accountability revolution’. The issue looked at why accountability had become so important to the sector; which actors should be accountable; what they should be accountable for; and what actions were being taken. Nine years on this new issue gives us a chance to review the current state of affairs. Has our understanding of accountability changed? Is it still as important as it was? Where have gains been made, and what are the challenges we face now and in the future?

Nine years ago the system was still coming to terms with a massive expansion in the number of humanitarian actors. It was also attempting to address the findings of the Joint Evaluation of Emergency Assistance to Rwanda (JEEAR). Although there was explicit recognition that the responsibility, and therefore accountability, for humanitarian response rested with the state, it was also understood that, in many crisis situations where state capacities were weak, accountability also rested at an individual, operational agency and donor level. Within this context, agencies and donors undertook to become more professional, to use their power more responsibly and to be more accountable for what they did.

Rationale

The underlying rationale for this commitment had two main elements. First, there was a moral argument informed by humanitarian principles and a rights-based approach. The core of this focused on the ‘legitimate rights of the claimant’ and reflected the ideology of the time that ‘the recipient knows best’. The Humanitarian Accountability Partnership (HAP) was established to help agencies realise this vision through compliance with standards; other approaches, such as that of Médecins Sans Frontières (MSF), focused on solidarity with the claimant. There were debates about which was the most appropriate approach, but most in the sector agreed that accountability had an essentially moral centre. Second, most people believed that improved accountability would also bring about better results, performance and impact. It was also assumed that working closely with affected communities would have the added benefit of improving security for operational staff in insecure environments. There was little or no evidence to support the argument that better accountability would lead to more effective, secure programming at the time, but good sense told us it surely must be true.

While the rationale for improving accountability seemed clear, deciding how to do this was not. Agencies had a diverse range of options to choose from, resulting in a rich, but sometimes confusing, array of approaches. One commentator categorised these into three main types. The



Colin Crowley/Save the Children

A family outside their home in a village in the Northern Bahr-el-Ghazal State of Southern Sudan

first, which was rights-based, focused on involving claimants in the planning and implementation of aid programmes. The second was based on humanitarian principles, codes of conduct and legal instruments. The third adopted methods from public management, including technical standards, performance indicators, impact assessment and results-based management. These categories were not exclusive and different agencies adopted elements of each. New initiatives were established to assist agencies in building their capacity to be accountable, including ALNAP, Sphere, People in Aid, HAP and the Good Humanitarian Donorship Initiative.

This dual rationale for accountability – based both on moral and practical considerations – remains important today. At the same time, the need to account for funds has become ever more pressing. Humanitarian spending has risen significantly, reaching almost \$17 billion in 2010, and this against the backdrop of the global economic crisis.¹ As always, much of this money is spent in chaotic circumstances where financial infrastructure and systems of

¹ Development Initiatives, *GHA Report 2011*, 2011.

government tend to be weak and levels of corruption high. At the same time, the media has become more critical and its reach wider. It is not surprising therefore that donors – both public and private – are holding humanitarian organisations to account for using funds as efficiently and effectively as possible. Alongside the growing concern about value for money there is also a resurgence of interest in demonstrating results and impact. While these aspects of accountability have always been important, there have been concerns that overemphasising them could undermine the moral rationale for accountability.

Actions

In the past decade, there has been real progress in accountability to beneficiaries, evidenced by a growth in member-led initiatives relating to different aspects of accountability, an increase in the number of agencies operating complaints mechanisms, an increase in the number of evaluations and a greater degree of consultation with beneficiaries. As a result, humanitarian workers feel that accountability – and particularly accountability to beneficiaries – has improved.² Progress has, however, been patchy, and is not necessarily recognised as such by beneficiaries themselves.³

We should not underestimate the challenges humanitarian practitioners face in trying to take account of beneficiary opinions and be responsive to their needs. The humanitarian context makes accountability important, but it also makes it very hard to achieve. Even when humanitarian workers have the ability and time to listen to affected people, the inherent power imbalance between aid worker and beneficiary often prevents honest communication. Given these constraints, we may have to accept that it will always be difficult to achieve full accountability to beneficiaries, and that there will always be scope for improvement.

Many of us wonder if the hard-earned gains of the last decade have led to improvements in performance. What we do know is that there have been incremental improvements in many of the components of system-wide performance over recent years. But we do not have a precise understanding of the relationship between improved accountability to clients and improved performance. We believe there *should* be a mutually supportive relationship, but evidence from the field sometimes suggests otherwise. We have had even less success in measuring results and impact. Despite the gradual embedding of evaluations within the system over the last decade, the ALNAP Evaluative Reports Data Base shows that, in practice, there are still too few evaluations of impact. While new guides and frameworks have been written and new initiatives set up, humanitarian impact assessment is still *ad hoc*, rather than systematic. There are good reasons for this, including genuine difficulties

² See Paul Harvey et al., *The State of the Humanitarian System: Assessing Performance and Progress – A Pilot Study*, ODI/ALNAP and HAP, 2010; ‘Perceptions of Humanitarian Accountability – Annual Survey’, in Humanitarian Accountability Partnership International, *The 2010 Humanitarian Accountability Report*, 2011.

³ Helen Baños-Smith, *The Right to a Say and the Duty To Respond*, Humanitarian Accountability Partnership International, 2009.

around methodology, but there is also a lack of incentives for agencies to tackle this seriously.

The role of humanitarian donors

Donors have always had an obligation, not only to ensure that the agencies they funded were accountable, but also to demonstrate their own accountability to taxpayers. With regard to the latter, the establishment of the Humanitarian Response Index, which ranks donors in relation to their adherence to GHD principles, is an important development. The report has now become part of the accountability landscape and is an excellent (and rare) example of civil society taking action to make governments more accountable. In relation to the former, donors have come under increasing pressure to demonstrate that funds are spent well.

There is an inherent tension here between allowing operational agencies as much independence as possible and ensuring quality control. Many humanitarians feel that, in practice, the quality control function is overwhelming operational independence and making it more difficult for agencies to listen to affected communities, take what they say on board and change programming accordingly. It also prevents humanitarian actors from taking risks and introducing innovations that – if successful – would greatly improve the lot of disaster-affected people, but which – if unsuccessful – would not represent good value for money or the efficient use of funds. In other words, the control element of this exercise may inadvertently mitigate against the types of innovative thinking and action which have often formed the basis for successful humanitarian action.

Emerging challenges

In some ways, humanitarian accountability is becoming the victim of its own success. The multiplicity of accountability mechanisms and initiatives are now in danger of creating confusion, adding to the load on operational staff and potentially damaging the performance of humanitarian organisations. Many humanitarians – and particularly those working at the field level – are confused by the variety of approaches and frustrated by the burden of form-filling and reporting.

This begs the question: are there now too many reporting requirements, accountability frameworks and forms to fill in? The perception is that many systems overlap and create unwanted duplication. If this is the case, the challenge will be to develop simpler, common mechanisms, which retain the rigour required to ensure that humanitarians are using resources in the most valuable ways, but which are also flexible enough to include the voices of disaster-affected people, and accommodate opportunities, innovation and justifiable risks. As our accountability mechanisms become more sophisticated and effective, we find ourselves balancing the requirements of different stakeholders, and taking into account the sometimes conflicting opinions of disparate groups.

We have noted already that there is potential tension between being accountable to donors and being

accountable to beneficiaries. But the experience of many agencies suggests that this is not the only tension caused by multiple accountabilities. There are also tensions between one set of beneficiaries and another: beneficiaries have different and sometimes competing needs and aspirations. Increasingly, agencies may have to find ways to balance the desire to use existing, culturally appropriate mechanisms for accountability (which risk overlooking and further marginalising beneficiaries who are excluded within that culture) and the desire to include the most vulnerable (which may lead to external agencies challenging culturally accepted norms or the political status quo). This tension – between the imperative to be neutral and impartial and the imperative to support the needs of the most vulnerable – is not new, but it is amplified by successful approaches to beneficiary accountability: the more we take the voices of affected populations into account, the more we are confronted by diverse needs and expectations. We can also expect to see increased tension between accountability to beneficiaries and accountability to the state. In the absence of alternative channels of communication marginalised people often use agency accountability mechanisms to complain about things outside the agency's remit, including issues related to government policy or performance. In the future, agencies might well find themselves challenging criticism of governments at the same time as they become increasingly engaged in areas such as cash interventions and Disaster Risk Reduction, which require closer cooperation with government entities.

Humanitarian organisations will need to become more skilful at balancing accountabilities to donors, beneficiaries and the governments of crisis-affected countries. In addition, they are increasingly recognising that they need to be accountable to one another. This is largely a result of the growth in the number of humanitarian actors, and of a general move towards multi-sectoral responses. Humanitarian organisations are finding that the failings of

one agency can tarnish the reputation of the community as a whole. Addressing this will require improvements in collective accountability.

Conclusion

The accountability revolution has delivered some real gains in accountability to donors and to claimants. We have learned from experience that, while the latter is often very difficult to get right, it remains at the centre of the humanitarian imperative. In other areas less progress has been made. The systematic demonstration of results and impact still seems to be beyond the capacity of the humanitarian community, and a realistic appraisal of what is possible may be required. As the humanitarian system expands, so the web of accountabilities grows larger and more complex, and agencies will have to find ways to demonstrate accountability to a growing number of stakeholders, and to balance their competing claims. The biggest challenge appears to be achieving the rigour required for donor accountability, while being flexible enough to include the voices of affected people. This may require some harmonisation of the current instruments.

Although frameworks and mechanisms are necessary to make agencies accountable, it is the culture of the organisation as a whole, and the behaviour of individual staff on the ground, that ultimately counts. As yet, there are perhaps too few incentives for staff working in pressurised and chaotic environments to display accountability, and many disincentives: mechanisms are time-consuming, are seen as constraining action and make people feel judged. If the humanitarian system wants to fully incorporate the multiple accountabilities required by today's emergencies, this will need to change.

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United we stand? Collective accountability in the humanitarian sector

Andy Featherstone, independent consultant

With recent high-profile humanitarian crises providing a very visible picture of global humanitarian need, the capacity and competence of the humanitarian system have been the subject of considerable debate. Much has been written about the importance of strong leadership and a commitment to partnership across the humanitarian community as a foundation for effective and timely humanitarian action. While this is undoubtedly true, an issue which is of equal importance but which has received less attention is the need for collective accountability to act as a cornerstone for humanitarian action. This article examines the vexed issue of collective accountability in the humanitarian system and argues that the needs of

those affected by disasters require a step change in how the diverse elements of the humanitarian system account to each other for their actions.

Identifying humanitarian challenges

The response to recent crises, such as the Haiti earthquake in January 2010, the Pakistan floods in August 2010 and the current drought in the Horn of Africa, have pushed the capacity of the humanitarian system to its limits, and seen the launch of the largest-ever UN Consolidated Appeal, which for 2011 targets 50 million beneficiaries at a cost of \$7.4 billion. At the same time as the scale of humanitarian need is growing, there is

also a perception that the environment in which humanitarian assistance is delivered is becoming more complex as a result of the growth and increasing diversity of humanitarian actors and the politicisation of humanitarian assistance, with for-profit contractors and foreign militaries rubbing shoulders with ‘traditional’ humanitarian actors. While the impact of this continues to be the subject of significant debate, there is broad agreement that the dilution of humanitarian principles in certain countries has reduced the space for agencies to provide humanitarian assistance and has made it more dangerous for agencies to intervene.

While the sector has a far from stellar record at communicating with those that it is seeking to assist, the complex environment has served to further distance those in need of aid from those providing it with the widespread adoption of deterrence strategies as a means of protecting staff. Several recent perceptions studies suggest that many people receiving assistance either cannot or choose not to distinguish between different organisations,¹ and it is becoming evident that in some contexts the failings of a single agency often count as a mark against the humanitarian community more broadly. In these places humanitarian agencies risk being collectively judged based on the actions of the weakest member. In such a crowded marketplace, operational independence can often only be achieved by those willing to stand out from the crowd and aggressively communicate their brand, an approach taken by ICRC and more recently by MSF, particularly in Afghanistan and Pakistan, where the organisation has suffered attacks against its staff.

Collective challenges require collective action

To address the challenges of scale and complexity, efforts have been made to strengthen leadership, partnership and accountability in the humanitarian system through the reform processes that followed the publication of the 2005 *Humanitarian Response Review*.

- **Leadership.** Responding to big disasters requires talented and effective leadership. A growing number of initiatives are being taken to develop, attract and support capable leaders. There has also been an important recognition that responsibility for humanitarian action cannot rest in the hands of a single person but should be shared, leading to the formation of broad-based Humanitarian Country Teams (HCT) tasked with supporting humanitarian leaders and improving the delivery of humanitarian assistance.
- **Partnership.** Underpinning the work of the HCT and the broader humanitarian community has been the

¹ See for example A. Abouzeid and A. Featherstone, *It's the Thought that Counts: Humanitarian Principles and Practice in Pakistan*, Actionaid International, 2010.



Hashmit (Hash Milhan via flickr)

A suggestion box

development (in 2007) of the Principles of Partnership (PoP), which outline a core set of commitments to bring together UN and non-UN humanitarian organisations on an equal footing and in theory provides a platform for joint problem-solving and delivering a more coherent humanitarian response.

- **Accountability.** The predictability of humanitarian response has been addressed through the development of the cluster system for coordination and accountability and the identification of providers of last resort for each sector. The cluster approach to coordinating sectoral responses has further enhanced collective and coordinated humanitarian action.

Recognition of the importance of collective action in meeting contemporary humanitarian challenges is also evident in the growth of interagency initiatives. Established forums such as the Emergency Capacity Building Project (ECB) aim to improve the speed, quality and effectiveness of the humanitarian response, and the Humanitarian Accountability Project (HAP) is mandated to make humanitarian action more accountable to beneficiaries. Newer initiatives such as the Consortium of British Humanitarian Agencies (CBHA) and the Communicating with Disaster-Affected Communities (CDAC) Initiative take a collective approach to increasing the speed, coordination, efficiency and transparency of the humanitarian system. Implicit in each of these initiatives is the recognition that the humanitarian community is strongest and can have greatest impact when it acts collectively.

Identifying the accountability deficit

Given the significant efforts made to strengthen collective humanitarian action it is curious that there has been such little thought given to collective accountability. This gap is most glaring at the level where it is most urgently required: the most senior levels of humanitarian leadership in-country. In humanitarian hubs such as Port

au Prince, Islamabad and Addis Ababa, where heads of agencies plan the delivery of millions of dollars of assistance to those in urgent need, it is of considerable concern that there is no single person or collective entity accountable for achieving humanitarian goals or leading humanitarian action:

- While the HC leads and chairs the HCT, s/he does not have formal authority over it; while the HC is accountable for the process of leading and coordinating humanitarian action, s/he cannot be held accountable for the results as s/he has no authority over the agencies responsible for service delivery.
- The members of the HCT are usually senior UN agency or NGO staff, and as such are accountable to their Regional Director or Head of Office for the delivery of results in the sector or geographic area where their agency works. However, they are rarely held accountable for process (such as participation in the HCT or clusters) unless they have specific cluster leadership responsibility. Furthermore, while the terms of reference for the HCT speak to its accountability for both processes and results, it is unclear who should hold it accountable – and so no one does.

It is this accountability deficit that needs to be urgently addressed. For the humanitarian system to work effectively and to meet new challenges and defend its values, a means is required to make the promise of shared leadership and equal partnership a reality – in other words, through a system of collective accountability.

Towards a model of collective accountability

Efforts to strengthen collective accountability should start at the highest levels of country humanitarian leadership, between the HC and the members of the HCT, and must be founded in the recognition that collective action and ownership of humanitarian response must be a shared responsibility.

Basic steps could include the following:

- Ensuring that HCTs reflect the diversity of the humanitarian system and include members from international organisations, local and international NGOs and government representatives (if possible).
- All HCT members should formalise their responsibilities in their respective ToRs to allow them to be held accountable within their own organisation for their performance in the team. Currently it is no surprise that, when time is short, members put their agency before their HCT responsibilities. Reworking ToRs may ensure that busy country managers make time for HCT business.
- Mutual accountabilities should be reinforced through the use of formalised work plans linked to the Common Humanitarian Action Plan (CHAP), with specific expectations and outcomes.
- Formal feedback mechanisms should be established between members of the HCT and the HC. The important issue here is the need to ensure that feedback can go

in both directions: from HCT members to the HC for the delivery of his/her compact, but also from the HC to HCT members for their engagement in and delivery of tasks associated with the HCT workplan.

- Joint objective-setting between HCT members (including the HC) would be the ultimate goal, as it would allow the team the greatest possible opportunity to work towards common objectives.

However, mutual accountability can only go so far, and it will only be through strengthening collective accountability for humanitarian action that it will be possible to make a step change in the effectiveness of humanitarian response. In addition to the potential benefits for those affected by disaster, strengthening collective accountabilities also has far greater potential to make progress in some of the more thorny aspects of humanitarian assistance; concerns about diminishing humanitarian space have been an agenda item across HCTs in a number of countries for some time, although a unified response across the humanitarian community has been difficult to broker. While a system of collective accountability should not be seen as a panacea, it would certainly provide a more conducive environment in which to negotiate agreement and hold agencies to account for their actions.

The challenge this presents to the humanitarian community is how to move from rhetoric to reality. While discussions on the issue remain in their infancy, the establishment of regional IASC teams and the growing number of international NGOs setting up regional management structures may offer the potential to trial innovative ways to strengthen team accountability to a regional management mechanism.

Conclusion: united we stand, divided we fall?

A move towards greater collective accountability for humanitarian outcomes will be a significant step for the humanitarian community; while it has the potential to make assistance more effective, it will also raise complex questions of agency independence and power relations between diverse partners. However, with the cracks caused by the politicisation of humanitarian assistance proving difficult to paper over, one result of the failure to find a collective response may be that the aid community becomes increasingly fragmented, which would be to the detriment of those in need of assistance. The humanitarian community has never been afraid to explore and embrace new ideas – given the continuing scale of humanitarian need and the increasing complexity of the operating environment, exploring ways to strengthen collective accountability for humanitarian action seems too good an opportunity to miss.

Andy Featherstone is an independent consultant specialising in humanitarian policy and research. This article draws on an earlier paper written by the same author, entitled *Fit for the Future: Strengthening the Leadership Pillar of Humanitarian Reform*, NGOs & Humanitarian Reform Project, 2010.

Only as strong as our weakest link: can the humanitarian system be collectively accountable to affected populations?

Gwyn Lewis and Brian Lander

Many humanitarian organisations are looking at how to become more accountable to affected communities in a more systematic way in order to better respond and meet needs. The humanitarian community as a whole is also trying to be more open and attentive to serious complaints arising during programme implementation, and to adapt to changing needs throughout the programme cycle. As a result numerous initiatives have been developed that identify methodologies, standards and criteria to achieve greater accountability.

If being accountable to affected populations requires individual organisations to develop systems and methodologies, this begs the question of what the humanitarian community working together in a coordinated way may need to do to ensure that it, as a collective, is also accountable. This requires not only greater awareness and, potentially, greater harmonisation of the policies and practices of each agency, but also a willingness to deliver programmes in a way that reinforces collective commitments to accountability.

The purpose of this article is not to prescribe a collective methodology, but highlight some of the issues that individual organisations are struggling with, but which also need to be looked at system-wide.

Working together and being accountable

In April 2011, the Principals of the Inter-Agency Standing Committee (IASC)¹ once again acknowledged the fundamental importance of accountability to affected populations. It was also acknowledged that a significant side-effect of greater accountability and better communication is that programmes are more responsive and the security of humanitarian workers improves. The IASC Principals agreed to integrate accountability to affected populations into their individual agencies' statements of purpose as well as their policies. Members will report back on progress at the end of the year. They also agreed to strengthen collective accountability within the humanitarian system. It is clear that individual organisational commitments and practices cannot be divorced from collective commitments and the overall humanitarian architecture. However, it is also clear that improved accountability can only be effective if agencies are willing and able to uphold their responsibilities.

Following on from the IASC Principals meeting, an initial consultation with a number of actors was held in early July. Invitees included organisations directly involved

¹ See <http://www.humanitarianinfo.org/iasc>.



UN Photo/Logan Abassi

WFP food aid being unloaded in Haiti

in developing standards and systems to strengthen humanitarian accountability, donor representatives and representatives from UN agencies and NGOs, including those with cluster leadership responsibilities. Participants reviewed the potential elements of an operational framework for implementing agreed commitments to improving accountability to affected populations, using the Sphere standards and the Humanitarian Accountability Partnership (HAP) or other methodologies as a means of verification. While this remains work in progress, there was general recognition that, as a community, we have a unique opportunity to make significant progress in improving how we interact with and respond to the needs of affected communities.

Being accountable for accountability

During an emergency, the humanitarian community as a collective comes together under the auspices of a Humanitarian Coordinator (HC). The HC draws the different elements of the humanitarian community, the UN, NGOs and the Red Cross and Crescent Movement, together to coordinate rapid responses to crises. To achieve this, the HC can encourage, advocate and cajole, but there are no direct management lines to heads of UN agencies, let alone other organisations working in the country, whether national or international.

In a system characterised by non-hierarchical relationships between partners and competition for visibility and funding, the humanitarian community as a whole cannot be fully accountable either to the HC or to affected populations. To address this, one possible solution is for the system to develop some type of peer review between organisations. This is already happening to some degree within clusters: a cluster member is responsible to their organisation, but is also accountable to cluster peers for commitments

made by the cluster. For the humanitarian system to be accountable everyone within that system must have a common understanding of what accountability to affected populations means. This requires a common understanding and set of commitments, as well as a practical way to take these commitments forward. Such commitments would provide a commonly agreed baseline for agencies to then elaborate or enhance an individual organisation's accountability, to monitor that accountability and to provide coherence and a clear understanding of what accountability to affected populations really means.

How feasible this approach will be is uncertain given that clusters often engage with national and international organisations with very diverse mandates and expertise. The fact that a growing number of NGOs, CBOs and donors operate mainly or in some cases entirely outside of the system is another challenge. Nevertheless, these commitments and related operational frameworks will be the subject of continued development over the coming months, with a view to seeking endorsement by the IASC Principals in December 2011 and possibly the Global Humanitarian Platform in 2012.²

Only as strong as our weakest link

One particular and often discussed component of system-wide accountability to affected populations is joint feedback and complaints mechanisms (such as the one used in Dadaab refugee camp in Kenya and those put in place in Pakistan). In order to function well, a feedback and complaints mechanism needs a clear referral system to the organisation that receives the feedback/complaint. If feedback is given on a project or programme, adjustments may need to be made. In the case of a complaint, a clear system for investigating that complaint and taking appropriate action is also needed within each organisation.

If, in the case of a joint feedback/complaints system, one organisation does not respond in a timely and systematic manner, what was initially feedback can become a complaint. If there is no follow-up on a complaint and corrective action is not taken, this can become an even more serious issue, potentially posing a threat to all organisations working in a community, because everyone is seen as equally culpable and confidence in the whole system is weakened. Providing means to draw out sensitive issues from complaints systems is critical.

Ensuring the right policies and commitments is therefore only the first step. Follow-up on complaints is key and appropriate systems to ensure that complaints are addressed need to be established if the humanitarian community is to achieve collective accountability. This will also require support from senior managers, and adequate and consistent resources.

Is it always possible to listen and communicate?

A key activity of any accountability system is to ensure an open channel of communication. It must be recognised,

² See <http://globalhumanitarianplatform.org/ghp.html>.

however, that in the height of an emergency assumptions based on expertise and experience are often what save lives. When there is limited information but high urgency, organisations tend to deliver what they know how to deliver well and to anticipate need. In other situations, such as during times of conflict or in areas where access and security problems limit the movement of humanitarian workers, listening and involving communities in all phases of the project cycle may not be feasible.

Nevertheless, it is possible to communicate with affected populations in a more systematic way, even when direct access is a problem. Using local media, new technologies and creative thinking communities can be told what they will receive, by when and what to expect from the humanitarian community. But multiple channels of communication through which feedback or complaints can be submitted can lead to confusion and frustration. The most effective mechanisms are simple and defined by communities themselves.³

Twitter, Facebook and blogs can all be used for communication, though harnessing these real-time but indirect channels, and utilising them in an effective way, remains a challenge. Information communicated through these means can be difficult to verify and may not be consistent or accurately reflective of needs. Often they serve primarily as a means to feed the media, but lack the detail or consistency necessary to check and adjust programmes. For example, although Ushahidi helped identify areas of concern in Haiti, detailed needs assessments and field visits were necessary to identify humanitarian needs.⁴ The expansion of mobile phone networks is also allowing many communities to exchange information by SMS. This is already being used as a means to provide credit for beneficiaries to buy food, but the technology requires access to computers, mobile phones and networks that may not always be available, especially after a disaster.

Local practices and power structures are significant factors in determining the most appropriate way to communicate, particularly in submitting complaints. Verbal communication can be the preferred means due to fear of retaliation or low literacy rates. Establishing mechanisms that allow for regular and direct contact with communities and individuals, while resource intensive, can be an important means to establish trust, manage expectations and provide regular feedback on programmes.

A paramount concern is ensuring confidentiality in serious cases, in particular accusations of sexual exploitation or abuse. Ensuring that victims know their rights and are adequately protected, and that necessary action is taken to address the complaint, are critical to the implementation of any accountability mechanism. This issue still needs to be addressed and a methodology found for the collective, although some work has been done in Dadaab and Pakistan, and other projects will be piloted in the coming months.

³ Church World Service, 'Research Report on Quality and Accountability in Pakistan after the Floods', <http://www.cwspa.org>.

⁴ See <http://www.ushahidi.com>.

Perceptions and behaviours

The behaviour and attitudes of staff and how they interact with affected communities is a significant factor in building confidence in any accountability mechanism. Humanitarian staff may not always be aware of local customs and traditions, may not be able to communicate in local languages and may appear indifferent or even offensive to populations of concern. Increasing cultural awareness and ensuring that humanitarian workers are well briefed not only on the operation in which they are concerned but also on the broader humanitarian effort and the circumstances in which it is taking place are necessary measures to improve the quality and consistency of interactions with affected communities.

Ways forward

Maintaining regular contact with affected populations can be challenging and time-consuming, but must remain a priority for humanitarian agencies if they are to ensure an effective response. Unfortunately, the system provides few incentives for listening to communities and adapting programmes in accordance with their feedback. In fact, there are more disincentives than incentives. Adapting or changing a programme midway through can attract head office or donor criticism that the project was not well planned, or in some cases result in the donor refusing to fund the proposed changes. This needs to end. Donors

and other decision-makers within the system need to encourage and support flexible, iterative approaches to programme delivery based on interaction with and feedback from communities.

It is encouraging that the IASC Principals have recognised the need to improve accountability to affected populations. The work being done to put in place commitments by the IASC (and possibly the Global Humanitarian Platform (GHP) as well) will help to clarify the challenges and how they can be best addressed by the humanitarian community as a collective. These commitments should ensure greater consistency, improve how accountability is measured and therefore improve the overall humanitarian response. But putting these commitments into practice will be the real test. Given competing priorities and limited resources, the question remains as to whether there is sufficient will to move beyond the rhetoric and bridge what many perceive to be a growing divide between humanitarian organisations and the people they aim to help. The IASC Principals have opened up a new and unique opportunity to address this concern: let's hope that the humanitarian community as a whole is able to capitalise on it.

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Real Time Evaluations: contributing to system-wide learning and accountability

Riccardo Polastro, DARA

Over the last 20 years or so the humanitarian community has introduced a number of initiatives to improve accountability, quality and performance. Codes of conduct, standards, principles, monitoring frameworks and Real Time Evaluations (RTEs) have all been rolled out, and a new humanitarian evaluation architecture has emerged, in which RTEs are becoming a central pillar.

What is an RTE?

An RTE is a participatory evaluation that is intended to provide immediate feedback during fieldwork. In an RTE, stakeholders execute and manage the response at field, national, regional and headquarters levels. An RTE provides instant input to an ongoing operation and can foster policy, organisational and operational change to increase the effectiveness and efficiency of the overall disaster response.¹

RTEs are formative evaluations of intermediary results. They can free up operational bottlenecks and provide real-time learning. An RTE is intended to be a support

¹ For further information on the characteristics of RTEs see A. Jamal and J. Crisp, *Real-time Humanitarian Evaluations: Some Frequently Asked Questions (EPAU /2002/05)*, UNHCR Evaluation and Policy Unit, May 2002, <http://www.unhcr.org/research/RESEARCH/3ce372204.pdf>.

measure for learning in action. RTEs are also improvement-oriented reviews – dynamic tools used to adjust and improve planning and performance. They can contribute to reinforcing accountability to beneficiaries, implementing partners and donors, and can bridge the gap between monitoring and ex-post evaluation.

RTEs are, in principle, carried out in the midst of an emergency operation. They are interactive, involving a wide range of stakeholders and therefore contributing to peer-to-peer learning and accountability. Because the results and recommendations are intended to be applied immediately, RTEs must be rapid, flexible and responsive. In contrast, mid-term evaluations look at the first phase of the response in order to improve the second phase, and ex-post evaluations are essentially retrospective: they examine and learn from the past. Monitoring in humanitarian aid is often absent and, when it is in place, is not adapted to the changing realities on the ground. An RTE can help bridge the gap as it provides an immediate snapshot that can help managers identify and address the strengths and weaknesses of the response.

RTEs are one of the most challenging types of evaluation because teams are usually fielded within six weeks to six



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A focus group discussion during the Real Time Evaluation of the response to the displacement crisis in Pakistan in 2009

An RTE is more interactive than other types of evaluations – the evaluator acts as a facilitator and there is sustained dialogue with key stakeholders throughout the evaluation in the field, in the national capital, at regional level and in HQ. The level of interactivity must be high and continuous in order to identify and resolve problems with organisational or operational performance and to act as a catalyst for improvements. The evaluator observes and advises on the emergency planning and operational process and fosters stakeholders' involvement. As a result during the RTE process stakeholders define what, how and who can improve the overall response, outlining clearly roles and responsibilities.

months following a disaster, when agencies are trying to scale up activities. They have a short timeframe, and findings are made available quickly. The inter-agency RTE carried out in Haiti in 2010 was deployed just three months after the earthquake struck. In these circumstances, the RTE can become burdensome to the agencies involved, and the exercise can suddenly become a 'wrong time' evaluation. RTEs also have to be carried out within relatively short periods of time. In general, teams have only two to three weeks to conduct the analysis and make the evaluation judgment before leaving the field. Findings are then fed back for immediate use. RTEs can potentially identify and suggest solutions to operational problems as they occur and influence decisions when they are being made by feeding back aid recipients' and providers' views.

RTEs can also reinforce the link between operations and policy formulation. This was the case in Mozambique, where the RTE examined how the UN humanitarian reforms were being rolled out in the field. A management matrix was implemented and the recommendations were closely monitored by the UN Emergency Relief Coordinator, looking at how Humanitarian Country Teams were applying lessons on UN humanitarian reform.²

Methodological approaches

Evaluations of humanitarian aid demand specific methodological approaches because of the speed and turbulence of these interventions and the fast-evolving contexts in which they take place. Baselines are often absent and there is high staff turnover. Evaluation teams must be small and flexible with a very light footprint in the field as 'all the team must fit in a Land Cruiser'. As with other evaluations, RTEs essentially use qualitative methods including interviews (purposeful snowball sampling with 'information rich' individuals, group discussions etc.), extensive field travel to sample sites, peer review, observation and documentary research.

² Tony Beck and Margie Buchanan Smith, *Joint Evaluations Coming of Age? The Quality and Future Scope of Joint Evaluations*, ALNAP, 2008, <http://www.alnap.org/pool/files/7rha-Ch3.pdf>.

Single-agency and inter-agency RTEs

Single-agency RTEs focus on a particular agency response, while inter-agency or 'joint' RTEs evaluate the response of the whole humanitarian system. Joint RTEs adopt a broader perspective and deeper understanding of cross-cutting elements such as the overall direction, coordination and implementation of the response, including needs assessments, threats to humanitarian space, coordination and operational bottlenecks. When done jointly, an RTE represents a learning and accountability opportunity for participating agencies and national and local governments, as well as affected communities. Actors involved in the response are consulted (the affected population, national government, local authorities, the military, local NGOs, international donors, the UN, the Red Cross/Red Crescent and INGOs), fostering increased learning and accountability across the humanitarian system.³

Key stakeholders

Normally, the primary audience of an RTE is in the field, the secondary audience is at HQ and the tertiary audience is the humanitarian system as a whole. However, this strongly depends on who initiates the RTE and who raises the key issues to be addressed. If the evaluation is launched from headquarters, the level of ownership in the field is likely to be reduced. In this case, the RTE may be perceived as intrusive and primarily geared to upwards accountability rather than facilitating joint learning and accountability on the ground. In contrast, when the exercise is initiated in the field (as was the case in the Mozambique inter-agency RTE of the response to the floods and cyclone in 2007 and in the humanitarian response to Pakistan's internal displacement crisis in 2010), the RTE is usually welcome as all actors believe that it can contribute to improving the ongoing response.

An RTE can contribute to improved accountability to different stakeholders by involving them in the process.

³ John Cosgrave, Ben Ramalingam and Tony Beck, *Real-time Evaluations of Humanitarian Action: An ALNAP Guide Pilot Version*, 2009, <http://www.alnap.org/pool/files/rteguide.pdf>.

Box 1: The inter-agency RTE of the Pakistan floods of 2010

During this RTE, initiated in 2011, one national and three provincial workshops were held with key stakeholders involved in the humanitarian response to the floods. Findings, conclusions and recommendations were initially presented by the team leader during the workshops. Stakeholders then jointly validated and prioritised the recommendations and defined the organisations responsible for implementing them (by whom) and timelines (by when). This process contributed to boosting ownership of the evaluation recommendations and fostered real-time learning and accountability among stakeholders. 'Once workshops ended the Resident Coordinator/Humanitarian Coordinator agreed that the HCT would draw an implementation plan of the recommendations.'⁴

With both inter-agency and single-agency RTEs the agencies whose activities are being evaluated are meant to act on the recommendations. However, feedback tends to be given mainly to peers and donors. Despite being the primary 'clients' of the aid industry, beneficiaries and local and national governments rarely receive feedback on the recommendations or how they are being implemented.

Challenges and limitations

There is a growing tendency to describe any evaluation as 'real time'. When fielded too late, after the disaster emergency response is over, the relevance of and need for an RTE should be questioned. During the first ten months following the earthquake in Haiti, ten separate RTEs (for donors, the Red Cross, UN agencies, NGOs and at inter-agency level) were fielded, which represented an enormous burden on staff and key informants.

Agencies initiating these simultaneous RTEs claim that they have individual learning and accountability needs, but there is no evidence to suggest that the added value outweighs the costs. Joint RTEs, in contrast, can add value through providing a mechanism for increased peer-to-peer accountability, particularly if the HC implements recommendations. By involving aid beneficiaries and local authorities, joint RTEs can also reinforce downwards accountability and learning. Unfortunately, however, such conditions can be difficult to achieve; only in the Philippines (2010) and Pakistan (2011) inter-agency RTEs were governments involved throughout the evaluation process.

Another challenge concerns who initiates and owns the evaluation. If HQ initiates the evaluation, key stakeholders in the field are likely to be less involved in the identification of issues and key questions, as well as during implementation on the ground. For the evaluator,

⁴ See Riccardo Polastro, Aatika Nagrah, Nicolai Steen and Farwa Zafar, *Inter-Agency Real Time Evaluation of the Humanitarian Response to Pakistan's 2010 Flood Crisis*, DARA, March 2011, <http://ochanet.unocha.org>

the challenge becomes identifying what the key questions are, who poses them and who will use the evaluation findings and recommendations. No Humanitarian Country Teams that had an RTE fielded in 2010 drew management matrixes defining which recommendations had been accepted, who was responsible for taking action and implementing them, and what the deadline was for doing so. Only in the cases of the Mozambique (2007) and Myanmar (2008) RTEs were management matrixes drawn up after the reports were released.

Another recurrent problem in many types of evaluations is the limited time available for consultations with beneficiaries. Careful planning can ensure that what time there is is used to best effect to ensure maximum stakeholder consultation. For instance, in Mozambique, as the inter-agency RTE was both initiated and supported by the field, four of the five team members were able to travel extensively and consult a representative sample of local people in the provinces affected by the cyclone and floods. Similarly, in the Pakistan 2010 floods RTE, incorporating lessons from previous RTEs the team dedicated 80% of its time to field consultations thanks to the involvement of all field hubs. It is important to achieve a balance between site visits (to gather a representative sample of the affected population) and interviewing information-rich individuals (who tend to be in capitals managing the response). The lack of experienced evaluators is another key challenge, as suitable candidates are generally booked up three to six months in advance.

A final limitation is lack of funding, even when calls for proposals for RTEs are launched. For instance, in July 2010 there was a call for proposals for the Kyrgyzstan inter-agency RTE, but no funding was secured; the Flash Appeal was also underfunded due to the time of year and the focus on other emergencies such as Haiti and Pakistan. In the case of Pakistan (2010 RTE), it took a long time for donor funding to be disbursed.

Conclusion

RTEs have a key role to play in humanitarian aid. First, they can contribute to improved learning and accountability within the humanitarian system. Second, they can bridge the gap between conventional monitoring and evaluation. Third, they can influence policy and operational decision-making in a timely fashion, and can identify and propose solutions to operational and organisational problems in the midst of major humanitarian responses. That said, there is a risk that RTEs may become just a wasteful box-ticking exercise, especially when carried out too late. The tendency to use them primarily for upward accountability purposes rather than for field-level peer learning and accountability undermines the added value of RTEs for personnel involved in the response.

To improve the humanitarian system's planning and performance, RTEs should be done at the right time. A triggering mechanism is needed to ensure that this happens and that adequate human and financial resources are allocated. Incentives for improving knowledge

management and encouraging real-time learning and accountability must be identified at the field level. There is a need to specify who is responsible for implementing recommendations and action plans after they have been formulated. Workshops with key stakeholders can help to validate and prioritise recommendations presented in the draft report and assign responsibility for implementation.

Finally, to maximise the potential contribution of RTEs to accountability and lesson learning, it is key that they become exercises that are 'owned' and utilised by the Humanitarian Country Teams (HCTs), rather than headquarters-imposed exercises carried out by flown-in evaluators who come and go, and then disappear. For inter-agency RTEs the ERC must hold Humanitarian Coordinators accountable for developing, monitoring and reporting on implementation of action plans agreed by

the HCTs. In addition to ensuring adequate involvement of field-level stakeholders in the RTE, including aid recipients and local authorities, initiating organisations need to provide regular feedback to them on the implementation of recommendations. Last but not least, RTEs should be disseminated better so that the wider humanitarian system can benefit from them.⁵

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⁵ All inter-agency RTE reports carried out to date are publically available at <http://www.unocha.org/what-we-do/policy/thematic-areas/evaluations-of-humanitarian-response/reports>.

NGO certification: time to bite the bullet?

Charles-Antoine Hofmann, SCHR

The humanitarian enterprise has grown dramatically over the last two decades. There are more NGOs, with more resources, and with more visibility. At the same time, the aid industry has faced a corresponding growth in criticism of its persistent weaknesses, including lack of professionalism, poor coordination, duplication and wasted resources. In response, the sector has developed a series of codes and standards to regulate itself. While these have gone some way to improve the quality and accountability of humanitarian assistance, there are limits to what can be achieved through self-regulation. As far back as 1996, the Joint Evaluation of Emergency Assistance to Rwanda (JEEAR) clearly stated that the development of codes and standards is not enough: 'some form of regulation or enforcement is needed to ensure improvements in performance of NGOs'.¹ Ten years later, the joint evaluation of the tsunami response made a similar recommendation.²

Despite these calls for a regulatory system, very little has happened. In part this reflects the complexity and diversity of the sector. It is unlikely that a one-size-fits-all approach would work, given the wide range of organisations involved, the broad spectrum of activities they engage in and the very different contexts in which they operate. It is also unclear who should have responsibility for certification: NGOs themselves, donors, affected states or an external body? What should be certified: the organisation, its programmes or the personnel delivering programmes? And what should the objective of a certification system be?

¹ Joint Evaluation of Emergency Assistance to Rwanda, *The International Response to Conflict and Genocide: Lessons from the Rwanda Experience*, 1996.

² *Joint Evaluation of the International Response to the Indian Ocean Tsunami: Synthesis Report*, 2006, Tsunami Evaluation Coalition.

This article explores some of these questions. It builds on research conducted by the Steering Committee for Humanitarian Response (SCHR) in 2011, and on some of the current experience in the sector. The question of certification is likely to remain high on the agenda given current financial turmoil and the resulting pressures on aid organisations to demonstrate value for money. However challenging such an endeavour would be, there are some useful experiences in the humanitarian sector and elsewhere to build on. The Humanitarian Accountability Partnership (HAP) has developed a certification system focusing on accountability and quality management. Some states already have processes and laws in place to regulate NGOs, and donors including ECHO have established conditions that NGOs must meet in order to receive funding. Private and public sector experience also offers some useful insights.

The purpose of a certification system

There is no agreement on what the purpose of a certification system should be. Is it to improve the quality and impact of humanitarian response? Is it to strengthen the accountability of NGOs, particularly with donors? Or is it to make sure that only organisations that meet professional standards operate in disaster response? The design of a certification system would largely depend on the answers to these questions. If the primary purpose is to ensure the application of quality standards by those certified, then self- and peer assessment are likely to play a central role. If it is to exclude poorly performing organisations, a more robust regulatory system needs to be in place.

While these different objectives are not mutually exclusive, the main driver for a certification system should be improving the quality of humanitarian response. This would ultimately enhance the credibility and professionalism of NGOs. There is, however, no hard evidence that certification

systems actually improve quality. Systems tend to focus on organisational processes, but the link between good organisational procedures and programme quality is based on an assumption that the former contributes to better results and quality. Conversely, poor organisational procedures (poor financial management, lack of clear policies, weak HR management) are believed to result in poor programme quality. In the private sector, the International Organisation for Standardisation (ISO) has developed the 'ISO 9000' norm for quality management. Abiding by it, however, does not guarantee that the products or services delivered will be of good quality. A company may conform with ISO 9000 standards and have all the right processes in place, yet still manufacture a poor-quality product.

What should be certified?

To overcome this important limitation, the certification process would need to move beyond the organisational level to address programming issues. The focus should be two-fold, looking at organisations as a whole, including governance, finance and human resources (this is the approach taken by SGS in its NGO Benchmarking Certification Audit); and operations, focusing on quality standards such as the Sphere Minimum Standards and the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs, ensuring that organisations use them and checking that they are met in particular programmes. A third area of focus is personnel, and ensuring that staff involved in programme delivery meet certain professional standards. The Enhancing Learning and Research for Humanitarian Assistance (ELRHA) project – a collaboration between academic and humanitarian organisations – is currently considering ways of certifying and accrediting humanitarian personnel.

While a comprehensive approach combining all three dimensions may be desirable, it would inevitably result in a very complex and unwieldy mechanism. Choices have to be made, and thus it may be necessary to focus on only one of these aspects. This article looks at the first two dimensions: organisations and their operations. The certification of humanitarian personnel, although an interesting avenue, takes a different approach, involving academic and training institutions and some form of professional association.

A focus on operations puts more emphasis on the quality of humanitarian action, yet it is also a more complex area given the differences in contexts and in types of programmes, with specific technical standards for each sector. Certifying organisational processes



Julien Hannes (via flickr)

Calling out beneficiary names during an aid distribution in Kibati camp, DRC

is easier, and standards would seem to be more easily transferable across organisations. A mixed approach, using a small set of standards focused on organisations, but also including some elements of programmes, would seem an appropriate way forward. To obtain certification, an organisation would need to comply in terms of organisational processes at its headquarters, and would need to demonstrate that such standards are also used in a sample of its operations. For this to be manageable, such a system should not cover specific technical areas. An obvious starting-point would be to use some elements of the Code of Conduct, as well as Sphere's Minimum Standards. Other existing standards developed for specific organisational processes – finance, HR, logistics, governance – could also be used.

The certification process

Based on experiences in the private and public sectors, a certification process includes the following three steps:

- Self-evaluation against an agreed set of standards and criteria.
- A peer review visit by a team selected and trained by a certification body, which reviews the evidence, visits premises, interviews staff and other stakeholders and produces an assessment report, including recommendations.
- An external review by the certification body of the evidence and recommendations against key criteria, which results in a judgement that is formally communicated back to the organisation (similar to an external audit).

It is important to note that all three steps may not be necessary in all cases: smaller NGOs may decide to focus on the first and possibly second steps. There can therefore be different degrees of certification. A full certification requires the completion of all three steps. This is important as it would provide external scrutiny, independence and credibility. The composition of the

certification body is a critical element. It must not be dominated by a particular group of stakeholders, in order to maintain a strong degree of independence. It is not desirable, and probably not feasible, to have a single certification body. Based on an agreed set of common standards, a certification system will need to be flexible so that it can be adapted to different needs and contexts.

Remaining challenges

The development of a certification system for NGOs would involve a number of important challenges.

- Certification systems are expensive. This is a regular criticism of such systems in the private sector. While focusing on a small set of standards with a lean and flexible approach would reduce the cost, it may still remain unaffordable for smaller NGOs with limited resources. Ensuring that NGOs with fewer resources are included in the process is therefore paramount: a certification system should reward merit and professionalism, not size and resources.
- Certification could become a bureaucratic exercise that has little to do with improving the quality of programmes, and could inhibit innovation and risk-taking. Focusing not just on technical or management standards, but also on the values that underpin humanitarian action, as expressed in the Code of Conduct, may address this.
- Finally, certification systems may enable donor governments and the governments of affected states to exert additional control over humanitarian organisations in ways that could undermine principled humanitarian action and negatively affect the quality

and effectiveness of the response. This is why the standards against which NGOs would be certified must be defined by humanitarian organisations themselves, and why the certification body must be independent.

Conclusion

The issue of certification tends to arise in the aftermath of responses to large-scale disasters. Recent debates following the response to the Haiti earthquake have echoed earlier calls for certification. Such a system would open up the humanitarian sector to greater external scrutiny, which is less likely in self-regulatory approaches. Arguably, a certification system would also restore confidence in the humanitarian sector among donors, the public and the recipients of aid.

There are at least three important considerations if such a system is to be successfully developed. First, strong leadership will be needed so that fears and obstacles can be overcome. Second, it will be critical to create real ownership on the part of the many stakeholders involved. Ultimately, a certification system should aim to serve the humanitarian NGO sector at large, and thus must be flexible enough to adapt to different needs and contexts. Lastly, there should be no doubt about the intention of certification: to improve the quality of humanitarian action for the benefit of people in need.

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Accountability – don't forget your staff

Jonathan Potter, People In Aid

The accountability priorities in the humanitarian and development sector have always been to beneficiaries and donors. But to serve beneficiaries and donors well organisations need to be accountable to staff. Such accountability is not to be found in words (e.g. 'we value our people'): organisations must act out their duty of care and moral commitment to good practice, and provide encouragement and frameworks for leaders and managers to demonstrate their commitment to their staff and volunteers. When an organisation is truly accountable to its staff there will inevitably be improvements in communications, management skills, team and individual performance, commitment and motivation, staff health and security, retention, the capacity to change and more. The overall result should be more effective delivery of mission, more efficient use of resources and ultimately financial savings.

Being accountable to staff

Externally, most observers will not be thinking of accountability in conceptual terms; donors, partners, beneficiaries and of course staff themselves will be

looking at the impact of accountability in pragmatic terms and with their own interests at heart. Donors have a clear interest in organisational performance; as one put it to me recently: 'Donors are holding organisations accountable and responsible for the performance of their staff', even if they may not know how best to assess and then correct what they might find. But US foundations may be a sign of the future of funding. As the *New York Times* reported in July, foundations and wealthy donors are increasingly harnessing their donations to improvements in management.¹ The article talks of 'good investment sense' and the wish to 'support management assistance efforts that apparently try to avoid crises of the magnitude that would create rifts between an organization and a management focused donor'. Of course, grantees need to be sure that a donor's demands are appropriate, but it is perhaps encouraging that more funds are becoming available for such support.

¹ Cited in Ruth McCambridge, 'Omidyar and Lewis and Their Approach to Management Advice', *The Nonprofit Quarterly*, 31 July 2011, <http://www.nonprofitquarterly.org>.

In relation to beneficiaries, the Humanitarian Accountability Partnership (HAP) says:

Inevitably, in looking at an organisation's accountability to its beneficiaries we must look at the role of staff and the systems which support them to carry out this accountability. We are expecting a range of HR policies and practices (job descriptions, performance evaluations...) to take notice of the organisation's expectation that staff will act accountably towards our beneficiaries. Our accountability is not just as an organisation but as a collection of individuals.

In a similar vein, the Keystone Partner Survey in January 2011 looked at the performance of international agencies from the point of view of their in-country partners. The role of staff was noted as the key characteristic of successful partnership – that ‘staff from NGOs are respectful, helpful and capable’.²

Staff themselves can choose to stay with or leave their organisation. Research suggests they tend to leave because of poor leadership and management, a dissonance between the organisation's stated values and organisational practice, burn-out or because of better rewards or greater promotion prospects elsewhere.

Accountability in HR and people management

Most people reading this article will be employees. And most employees want their employers to be accountable to them in a number of ways. Accountability to staff is the responsibility of various roles within an organisation; trustees, line managers, the HR function and employees themselves each have specific responsibilities.

Traditionally HR is accountable for regulatory compliance with labour laws and for good practice, while line managers are responsible for the operational impact of applying HR decisions. HR business partners can provide productive links between HR and the line, and the trend is for line managers to take on more responsibility for activities such as recruitment and performance (in the UK voluntary sector the HR function has seen a year-on-year reduction of 7% in costs per employee).³ Where there is statutory legislation and trustees have legal obligations (as in the UK for example), then HR acts on behalf of trustees to ensure compliance with equal opportunity and health and safety laws.

The leader (whether CEO, department head or team leader) is ultimately accountable for all things relating to people, including talent identification and management, security, health and safety, organisational values, culture and good HR practice, pay and benefits and ensuring optimal return on investment for staff-related activities (such as recruitment, learning and development). However, it is clear that not all CEOs realise (or accept) that, ultimately, the buck stops with them: following the kidnapping of one of his staff in Sudan, for example, the CEO of a well-known NGO was asked whether he had responsibility for the security of

² See <http://www.keystoneaccountability.org/resources/reports>.

³ Agenda Consulting, *People Count Third Sector*, 2011.

his staff. He answered ‘I don't believe I have ... When you go into a place like Sudan, you have to understand that the Sudanese authorities have taken control of security. I've 2,700 employees at the moment. Can I know what's happening in every village?’.⁴

In some ways the CEO is right: how can he know what is happening in every village? Perhaps not, but a different choice of words could have offered greater confidence to those to whom the organisation is accountable (especially staff, donors and beneficiaries). Equally, it is true that, below the leader, there is usually a hierarchy of people to whom the CEO delegates the implementation of policy; in this case, presumably, a Country Director and a security manager for Sudan. There is an alternative, which deprioritises accountability to management, hierarchies and compliance. Horizontal accountability suggests that teams and individuals can manage issues better than managers, and can improve productivity through trust, clear goals and communication.⁵ Relying on colleagues is a key component of good security, and will give an aid worker in the field more comfort than knowing the CEO is accountable to staff for the policy.

Such mutual accountability is equally important in other areas too. Examples include the Emergency Capacity Building (ECB) project's *Trust Handbook*,⁶ which provides tools to help build better-functioning emergency teams; agreement by participants at People in Aid's 2009 Humanitarian Human Resources conference⁷ that the emotional intelligence of colleagues was a major contributor to successful change programmes; and the growing acceptance of compulsory Codes of Conduct and whistleblowing procedures to promote transparency and combat fraud and undesirable behaviour.

Explicitly acknowledging the role of staff in organisational development is a useful way of spreading accountability. On values, for example, the Chief Executive of the UK's Chartered Management Institute says:

*The importance of engaging employees in the creation of values ... is too often forgotten. There's a tendency for leaders to spend hours holed up in boardrooms trying to thrash out what they think the vision and values of the company are. If your values are to resonate with employees, as well as customers, they must be an integral part of how the organisation does business, not simply a senior management aspiration.*⁸

Values are particularly important in the humanitarian sector: many staff could earn more in the corporate sector but they choose to work for humanitarian agencies because they wish to ‘make a difference’, and their employers' mission and values help them to do so. An HPG report

⁴ Paul Cullen, ‘Sharon Commins Says Goal Put Her Life in Danger’, *Irish Times*, 23 December 2010, <http://www.irishtimes.com>.

⁵ See <http://www.teaming-up.com/pdfs/mha.pdf>.

⁶ See <http://www.ecbproject.org/buldingtrustindiverseteams>.

⁷ See <http://www.peopleinaid.org/events/hhr>.

⁸ See <http://www.peoplemanagement.co.uk> (subscription required).



The Leprosy Mission in Nigeria, displaying the People In Aid Code of Good Practice

return on investment analyses to look at the people side of the organisation, on the operational side not enough is being done to use learning to bring about changes in practice. People in Aid looked at 56 recent humanitarian evaluations to see how staff issues were assessed. We found that references to human resource management were *ad hoc* and not systematically covered: 'The identification of HRM [human resource management] issues may depend on the interest and experience of the evaluator, only focusing on HRM when it has a noticeable impact on programme activities'.¹⁰ People In Aid and ALNAP are working together to ensure that the forthcoming ALNAP evaluation guide includes

notes that: 'Aid agency staff believe that organisational values, when communicated and reinforced through training, opportunities for advancement, appraisals and examples set by senior managers, promote honesty and loyalty to the agency'.⁹ Organisations should also be offering more to staff: trained managers, accurate job descriptions, ways of being consulted and equity in reward practices. The 'employer brand' – what the organisation says about itself and its relationship to its staff and other stakeholders – is strengthened where organisations and leaders live out the organisation's values and promote good practice in these areas.

Challenges and successes

So how is the humanitarian sector doing on accountability to staff? A report card would tell us that we could do better, but before we punish ourselves too harshly, let's consider the challenges we face, and the resources available.

A first challenge: organisations might see their accountabilities as compliance or self-interest, as opposed to a moral obligation: 'we will run security training so that any litigation is less likely to be successful', as opposed to 'we will run security training because we want our people to feel and be safe'. A second challenge: that procedures take precedence over people. Audits of HR are sometimes carried out not to test that policies and practices are having a positive impact on people and performance, but simply to ensure that HR staff and managers are following the procedure written down.

A third challenge concerns the organisation's willingness and capacity to learn about these issues. While HR, and to a lesser extent CEOs, are increasingly using measures and

questions to guide evaluators on HR practices.

In terms of resources there is a great deal for organisations to learn from and use. In addition to People In Aid's own Code of Good Practice, HR and people management issues feature in every generic code or standard for the sector. InterAction's PVO Standards, the INGO Charter, the Disaster Emergency Committee's Accountability Framework, the Sphere Handbook's Core Standards, the Australian Centre for International Development's Code of Conduct and many others all feature at least some aspects of HR for which subscribing organisations are expected to be accountable. So do codes with more specific intent, such as Keeping Children Safe (child protection), the HAP benchmarks (beneficiary accountability) and the Antares guidelines (preventing stress). The People In Aid Code was explicitly written to cover quality and accountability in all aspects of people management and HR.¹¹ When the Code was created in 1997 it was offered with a compliance mechanism to ensure that, unlike the NGO Red Cross Code of Conduct (the only agreed sector-wide standard to precede it), organisations could measure improvement against the standard and be recognised by staff, donors, peers and others for their achievements.

The People In Aid audit focuses on the extent to which adherence to the People In Aid Code is embedded in operational and management practices throughout the organisation, and the quality and effectiveness of consultation (see Box 1). Members go through this process of certification for a number of reasons, including to demonstrate their accountability to their staff. For Save the Children UK, for example, Jasmine Whitbread,

¹⁰ Internal report summarised in 'State of Humanitarian HR', <http://www.peopleinaid.org/publications/stateofhr2011.aspx>.

¹¹ See <http://www.peopleinaid.org/code>.

⁹ Sarah Bailey, *Need and Greed: Corruption Risks, Perceptions and Prevention in Humanitarian Assistance*, HPG Policy Brief 32, September 2008.

Box 1: The People In Aid audit

People In Aid certifies its members against AccountAbility 1000AS standards.¹² The three principal tests applied by the social auditor to members' own analysis of their compliance with the People In Aid Code Principles are:

Materiality: Is the information relevant to staff concerns and interests and will it help them make informed judgments about the agency's performance in relation to managing and supporting their work?

Completeness: Does the report provide sufficient evidence that the agency has understood and reported on all its significant social and economic impacts in relation to the People In Aid Code?

Responsiveness: Does the report demonstrate agency responses and a commitment to improving performance?

¹² See <http://www.accountability.org/standards/index.html>.

then CEO, said: 'This award is recognition to [all our people] that we have made great progress in raising our standards, demonstrating our willingness to be held accountable and to achieve our ambition to be a great place to work'. Likewise, the Sierra Leone Red Cross identified a range of benefits from becoming certified.¹³ In a statement the Society noted that it 'wanted to obtain committed status [i.e. certification] in order to demonstrate that it values its workforce who collectively contribute to the achievement of its objectives'.

Will every NGO, Red Cross Society and UN organisation, large or small and wherever the HQ, not just value but demonstrate that it values its workforce? If they do, there is little doubt that our individual and collective endeavour to help those affected by poverty, conflict and disaster, and to spend our donors' money efficiently, will be transformed.

Jonathan Potter is Executive Director of People In Aid.

¹³ See <http://www.peopleinaid.org/pool/files/pubs/sierra-leone-red-cross-society.pdf>.

Humanitarian leadership and accountability: contribution or contradiction?

Margie Buchanan-Smith

For a number of years humanitarian aid workers have been lamenting the lack of good humanitarian leadership. In 2009 a survey of approximately 500 aid workers carried out for ALNAP's *State of the Humanitarian System* report confirmed that they perceived lack of effective leadership to be one of the main challenges to humanitarian action.¹ But what is it that is missing? Over the last year ALNAP set out to answer this question by analysing examples of *effective* humanitarian leadership, looking at the qualities that aid workers value in humanitarian leadership and exploring the extent to which these qualities are fostered by humanitarian organisations.

The 2010 ALNAP study *Leadership in Action* focused on operational leadership in responding to crises.² Eleven examples of effective leadership were identified and researched. The examples covered different levels (from Humanitarian Coordinator to field manager), a range of different organisations and different types of humanitarian crises. The approach was based on the assumption that we can learn most about what works from studying models of excellence. The leadership qualities that emerged from the case studies can be grouped into six categories:

- strategic leadership skills;
- political skills;

¹ P. Harvey, A. Stoddard, A. Harmer and G. Taylor, *The State of the Humanitarian System: Assessing Performance and Progress. A Pilot Study*, ALNAP, 2009.

² Margie Buchanan-Smith with Kim Scriven, *Leadership in Action: Leading Effectively in Humanitarian Operations*, ALNAP, 2010, <http://www.alnap.org/pool/files/leadership-in-action-alnap-study.pdf>.

- relational and communication skills;
- decision-making and risk-taking skills;
- management and organisational skills; and
- personal qualities and values.

This article focuses on the fourth category, and specifically on risk-taking as this has particular implications for how leaders are currently held accountable. But what does risk-taking mean and why does it matter? Why is it not being fostered and how has the drive towards accountability contributed to risk aversion in the sector? These are the questions this article sets out to answer.

Is the space for operational humanitarian leadership contracting?

In order to foster leadership humanitarian organisations must give leaders and teams space to work, and must reward risk-taking. Yet one of the most striking findings from the ALNAP study is that this seems rare; effective humanitarian leadership often emerged in spite of, rather than because of, the prevailing culture in the humanitarian aid sector. This was particularly evident in terms of risk-taking.

Risk is inherent to humanitarian response. Humanitarian crises are, by definition, chaotic and unpredictable; no two crises are ever the same, and what works in one context may not work in another. The case studies emphasised the importance to leadership of understanding the context and dedicating time to contextual analysis. They also revealed that a key leadership quality is the ability and willingness to

take risks, and to innovate where the response requires more than a conventional approach.

At its most straightforward, risk-taking means making decisions on the basis of incomplete, unreliable and sometimes contradictory information. What was particularly valued in the case study examples was the leader's willingness to take more substantial risks that could dramatically improve the effectiveness of the humanitarian response. Examples included being prepared to talk to groups and individuals perceived as 'hostile' to the international humanitarian response yet who were key to negotiating access, such as the Islamic Court in the case of Somalia in the 2000s. Another example was the leader's willingness to travel, despite the dangers, to the centre of the humanitarian crisis – in this case the Nuba Mountains during the North–South civil war in Sudan – to talk to affected people and to understand the situation on the ground.

While many of the case study leaders showed great courage in taking these kinds of risks their decisions to do so were not made recklessly or uncritically but were based on experience and careful analysis, which was appreciated by their staff and peers. It was concerning, however, that the individual often had to carry the risk without the support of their organisation. This was expressed most starkly in relation to the UN, with some case study leaders commenting that they were most effective when they disregarded their own career paths and the risk-averse tendencies of their organisation and prioritised humanitarian objectives.

So why are humanitarian organisations so reluctant to encourage or back their leaders on the ground to take the risks necessary to make humanitarian responses more effective? This study suggests that a stifling culture of compliance and risk aversion has become the unfortunate by-product of the well-intentioned drive to improve humanitarian accountability.

This is happening in a number of ways, mainly connected with the heavy and mechanistic approach to proposal-writing and reporting that is now required for most humanitarian funding. Risk management, for example, is often reduced to a box-ticking exercise more focused on eliminating risk than on encouraging a dynamic and creative approach to risk-taking based on experience, analysis and judgement. Most donor funding mechanisms demand a high level of predictive accuracy on the part of the applicant, for example of the linear process that is expected to deliver the required



Phong Tran/RN

A health worker in Haiti appeals for calm following an aftershock

results in the log frame, despite the unpredictability of most humanitarian crises. Worse still, ever-more rigorous reporting requirements demand that funding recipients stick to and report against the proposed plan, rather than be responsive, flexible and opportunistic – qualities that are key to leadership – in an environment that is dynamic and changing. Yet an iterative approach is much more likely to result in an appropriate response than rigid adherence to what can quickly become an outdated plan.

The burden of form-filling and reporting associated with this culture of compliance is one of the more insidious ways in which the 'real work' – of talking to the affected population, deepening the contextual analysis and adapting the humanitarian response accordingly – is sidelined. One aid worker interviewed for the ALNAP study recounted how, in the 1990s, he used to spend 90% of his time in the community and 10% on reporting. Now he spends at least 50% of his time communicating with headquarters. This is how rigorous and demanding reporting requirements have become.

The combined effect is to reward and incentivise compliance with reporting and funding targets, which at best is only weakly linked to improving performance on the ground. At worst, it can weaken performance by diverting energy and resources away from the qualities and actions most likely to deliver an effective humanitarian response. In the words of one interviewee from the ALNAP study: 'you don't change the world and the [lives of affected people] with more monitoring on paper'. The extent of this clash between a culture of control and compliance and programmatic good practice is clearly laid out in Andrew Natsios' essay on 'The Clash of Counter-Bureaucracy and Development'. Natsios concludes that the bias towards compliance 'threatens program integrity... The compliance officers often clash with the technical program specialists over attempts to measure

and account for everything and avoid risk'.³ This finding is echoed in the ALNAP leadership study.

This intensifying yet stifling culture of compliance is not unique to the international humanitarian sector. It has been a growing trend affecting the public sector in most Western countries. A commentator on the ALNAP study cited the example of the UK's National Health Service: 'an organisation whose progressive politicisation and accompanying bureaucratisation have produced a managerial culture of compliance which has all but extinguished the fundamental value of human compassion on which good healthcare is based'. Many humanitarian organisations have also become more bureaucratic and corporate, further restricting the space to lead. For example, a strongly role-oriented culture that emphasises leadership based on position rather than ability rarely encourages risk-taking and innovation. There is often an inherent resistance to change in such bureaucratic cultures and a corresponding aversion to risk. This can inhibit even those in designated leadership positions. The courageous leader who takes action despite this stultifying culture may be even more 'alone' in their risk-taking and even more lacking in support from their organisation.

What does this mean for accountable leadership?

If the compliance culture is stifling operational humanitarian leadership, does this mean that the drive for accountability is counter-productive and we must drop our accountability demands and standards? Or does it mean that we must revisit and redefine some of those demands and standards? This throws up two key questions: how can leadership qualities that are essential to courageous decisions and to well-judged risk-taking be incentivised, and how can leaders be given the space to lead *and* be held accountable?

Experienced mavericks in the aid business recount nostalgically how much freedom they were given by their organisations to lead, design and run humanitarian programmes in the 1970s and 1980s, with only the occasional report back to head office. A huge amount of trust was placed in their hands and in their abilities. But we also know that many mistakes were made, mistakes which gave rise to concerns about the widely varying performance of humanitarian organisations in that era. Turning the clock back is not an option. However, where mistakes have been made, or where there is uncertainty in how to respond to a humanitarian crisis, there has been a growing tendency in the sector in the last 15 years to try and nail down how it 'should be done'. The ever-increasing corpus of standards and guidance materials that has resulted may have inadvertently discouraged the initiative and innovation associated with leadership.

Can we create an alternative and much simpler accountability framework, one that opens up the space to lead, that incentivises the qualities that make the difference between 'competence' and 'excellence' in humanitarian response and

³ A. Natsios, 'The Clash of Counter-Bureaucracy and Development', *Center for Global Development Essay*, Center for Global Development, Washington DC.

that reflects and encourages the qualities we know are key to effective operational humanitarian leadership, such as risk-taking, innovation and political acumen? This requires us to rethink what is important, indeed essential, to improved humanitarian performance. It also means simplifying the procedures associated with 'upwards accountability' to funders, and creating the space for greater engagement with the context and with the affected population, encouraging responsiveness to the realities of the humanitarian crisis on the ground. It may also mean relaxing the current obsession with the quantitative measurement of results, and accepting more qualitative approaches that are more appropriate to assessing leadership qualities.⁴

The way forward

The ALNAP study suggests a number of ways in which the space and incentives for effective humanitarian leadership can be created. First, it recommends that many of the current accountability initiatives and compliance mechanisms in the humanitarian sector be carefully reviewed to assess the extent to which they discourage risk-taking and effective leadership. Such reviews could provide opportunities to modify and simplify these frameworks and mechanisms to make them more 'leadership-friendly' – opening up space and incentivising the qualities and approaches that we know are key to effective operational humanitarian leadership – without abandoning accountability altogether. Second, it asks chief executives of humanitarian organisations and their senior management teams to review their organisation's appetite for risk and how this encourages or holds back their field managers. Chief executives and their teams need to encourage and give organisational backing to managers and leaders so that they feel able to take necessary risks, and to identify and learn rapidly from mistakes. Third, the study recommends that humanitarian organisations and their senior management teams reassess their incentive systems and look again at what is being valued. They must ask themselves how they can achieve a better balance between incentivising compliance (with reporting requirements and agency procedures) and incentivising effective operational leadership. Fourth, the study suggests learning from organisations that have successfully instilled risk-taking cultures, and exploring how such cultures can be replicated.

These steps, combined, will help us to find new and more appropriate accountability frameworks that enable us to hold humanitarian leaders accountable to what really matters – delivering an effective response that meets humanitarian needs – while encouraging and supporting them to take the courageous decisions and risks necessary to achieve this.

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⁴ In 'The Clash of Counter-Bureaucracy and Development' Natsios remarks that 'those development programs that are most precisely and easily measured are the least transformational, and those programs that are most transformational are the least measurable'. The same argument applies to humanitarian programmes and to leadership qualities – the most transformational are the least measurable.

Cash transfer programming in emergencies

Good Practice Review 11

June 2011

Paul Harvey and Sarah Bailey

The vast majority of international humanitarian aid is provided in-kind, in the form of food, seeds, tools, medicines, shelter materials and household goods. At the same time, however, there is a significant and growing body of experience with the provision of cash or vouchers as alternatives or complements to in-kind assistance. As experience with using cash transfers grows, so it has become increasingly clear that cash can play a part in assisting people after emergencies across a range of sectors. It can support access to food, help to rebuild or protect livelihoods, help to meet people's need for shelter and non-food items, support refugees and facilitate return and reintegration processes. The question is no longer *whether* cash is an appropriate way to meet the needs of disaster-affected people, but *how* organisations, donors and governments can use cash transfers to best effect, in line with their missions and mandates.

Cash transfers are not a sector in their own right: cash is simply an instrument that can be used – when appropriate – to meet particular objectives in particular contexts and sectors of response. Cash transfers are not a panacea; nor are many of the fears that still attend their use in humanitarian response justified in practice. Ultimately, listing theoretical advantages and disadvantages of cash transfers in comparison to in-kind relief is not a helpful framework for discussion. The appropriateness of cash transfers depends on needs, markets and other key factors, all of which vary from context to context.

This GPR synthesises existing cash transfer guidelines, centralises lessons from research and evaluations and adds practical examples drawn from cash-based interventions. It covers the provision of cash and vouchers to individuals and households in emergencies, protracted crises and recovery contexts. Separate chapters are devoted to vouchers and Cash for Work to cover the additional issues these forms of programming raise.

The GPR is written primarily for humanitarian practitioners who plan and implement emergency responses – both those who are already familiar with cash-based interventions and those who are not. The GPR will also be useful for senior managers in the field and in headquarters offices who are involved in approving operational responses and ensuring that their staff have the capacity and systems to implement projects using cash transfers. Humanitarian donors, government officials involved in disaster response, students studying humanitarian assistance and aid agency staff engaged in policy issues will also find this GPR useful.

The role of donors in enhancing quality and accountability in humanitarian aid

Corinna Kreidler, ECHO

The fact that the international humanitarian system is not delivering the quality of aid it is supposed to push all of us to look at what has to change. This article focuses on what donors can do to improve the quality of humanitarian aid. Donors have various roles within the accountability chain. First, there is accountability *to* donors: recipient agencies are accountable to donors for how the funding received is spent. This gives donors the leverage to insist that quality aid is delivered with the funds provided. Second, there is accountability *through* donors: the collective pressure donors can apply to other stakeholders, such as national governments and UN agencies. Finally there is accountability *by* donors: initiatives that look at quality and accountability within donor organisations themselves.

Donors are a key link in the accountability chain, and stakeholders expect donor representatives to ensure that action is taken when the humanitarian system does not perform well. However, most donor agencies are part of their government's foreign ministries, so they can only put pressure on recipient governments if this is in line with their own government's foreign policy priorities. Hence, it is important to take a closer look at what donors can and cannot influence – and what tools they have at their disposal to enhance the accountability and quality of humanitarian aid. This article uses the example of DG ECHO, the European Commission's Department for Humanitarian Aid and Civil Protection, currently the largest humanitarian donor in the world, accounting for some 40% of total humanitarian spending in 2010.

Accountability to donors

ECHO requires all potential partners to sign a Framework Partnership Agreement, which commits them to meeting minimum standards in their internal procedures and programming before they can apply for funding. While this requirement ensures that the many new and inexperienced agencies that often show up in high-profile crises are excluded, there is a risk that it could create a 'cartel' where only a few organisations have access and newcomers struggle to get in.

Donors can influence partners' adherence to standards and accountability mechanisms at the various stages of the funding cycle – proposal appraisal, monitoring, financial and narrative reporting and evaluation. When appraising proposals, the criteria should include the following:

- The tools used for needs assessment and project planning are appropriate.
- A transparent and cost-effective budget is provided.
- Arrangements are made for qualitative monitoring and independent evaluation.
- There is a commitment to applying agreed standards, such as Sphere.

Donor monitoring of funded projects is another way of enhancing quality and accountability. ECHO has a larger field presence than any other humanitarian donor, enabling it to systematically monitor all the projects it funds. Indeed, ECHO staff are held accountable if a project has not been monitored, or if the monitoring visit has not been documented. Through these monitoring visits ECHO staff ensure that the standards set at the proposal stage are met, and offer technical assistance to support other elements of good quality management, for example recommendations on improving monitoring systems through better quality indicators and help with designing an after-action evaluation. Increasingly, ECHO is sharing this monitoring capacity with other donor agencies, especially in multi-donor projects. It is gradually becoming good practice to share monitoring reports amongst donor colleagues and to organise joint donor visits, which in turn helps reduce the burden on partner agencies.

Peer monitoring by recipient agencies is also a useful tool for enhancing inter-agency learning. ECHO's peer-monitoring visits in Liberia in 2007 and Darfur in 2009 showed that this approach has great potential to add value as it goes far beyond the usual sharing of information on activities in coordination meetings. For example, instead of telling each other how many wells they have dug, participating agencies have in-depth discussions on such issues as well diameters and ways to encourage community participation in construction. In this way, a monitoring visit becomes a true source of joint learning and collective quality improvement.

Reporting, especially financial reporting, is a standard mechanism for enforcing accountability as a lack of information or analysis – or doubts about the same – can lead to an external audit and potential legal consequences, including ECHO requesting the reimbursement of funds or asking the EC's fraud investigation unit to take formal action. As a result, partners themselves normally ensure that good-quality reports are submitted on time. Finally, ECHO uses external evaluations, commissioned either by ECHO itself or by partners using ECHO funds. These can be eye-openers, both for the implementing partner and for the donor, and can lead to institutional learning on both sides.

Having qualified and experienced field staff is key to ECHO's approach of providing 'supportive supervision' to its partners. ECHO field staff have been involved for many years in the implementation of humanitarian aid work. When donor staff lack field credibility or the time and resources to visit funded projects regularly, the donor's ability to reinforce quality and accountability is significantly weakened. An exclusive focus on reducing donor administration costs (including resources for monitoring) can therefore negatively affect quality and impact.



An information board in a displacement camp in South Darfur

to further harmonise their standards and approaches in order to use their leverage to more effect.

Accountability by donors

Whilst individual agencies should focus on meeting beneficiaries' needs at the lowest possible cost (i.e. being efficient), donors have an obligation to ensure they achieve the highest possible impact with the funding they have available (i.e. being effective). This means not only selecting the best projects but also ensuring that proposals address areas and populations with the greatest needs. Funding second or third priority operations can reduce effectiveness as resources are then not available for more severely affected people. Hence,

The effectiveness of all of the quality control mechanisms discussed so far – with the exception of financial reporting requirements – depends almost entirely on the goodwill and internal procedures of partners.

Accountability through donors

Donors are often asked to use their collective influence to persuade national governments to adopt or avoid particular policies or courses of action. A recent example is a letter from five of the leading bilateral donors to the UN Principals calling for a 'proper accountability framework of the leadership pillar of humanitarian reform' and emphasising that 'we all share the responsibility to improve the international humanitarian response system'.

NGOs believe that humanitarian donors have a responsibility to use this leverage. However, ECHO policy, which requires strict adherence to humanitarian principles including maintaining a certain distance from national governments, means that it uses this approach very sparingly. Within the EU system, first and foremost EU Delegations have the mandate to negotiate with governments, and many other donor countries believe that their embassies or political representatives in their capitals are often better placed than humanitarian actors to exercise political leverage.

Donor leverage can also be used to address system-wide issues. A recent example is the Democratic Republic of Congo (DRC) donor group's efforts to improve collective reporting against the annual Humanitarian Action Plan. This initiative aims to improve joint reporting on common indicators in order to get an overview of what the humanitarian community in DRC has collectively achieved with annual funding of over \$500 million. As important stakeholders in a country's Humanitarian Country Team, donors can call for increased collective accountability and better results. Despite such individual positive examples, donors are still not punching their weight. Donors need

donors have to use all means available to them to ensure that they have sufficient data and information to make informed decisions on where and how to allocate funds.

Donors are accountable to themselves, through self-regulation, and to external actors, including non-operational agencies, host governments, taxpayers and the media. Open criticism of donor behaviour from within the aid system is very rare, as few grant recipients are prepared to bite the hand that feeds them. The Development Assistance Committee (DAC) peer review process and the Humanitarian Response Index (HRI) developed by DARA in 2007 have helped to address this. The primary objective of the HRI is to 'provide feedback to those responsible for humanitarian policymaking on how their efforts are seen from the ground'.¹

Donors have also attempted to regulate themselves through the Good Humanitarian Donorship (GHD) initiative, under which they have adopted a set of standards and operational principles. Despite some progress, research by the Humanitarian Policy Group (HPG) found that 'implementation efforts have not been significant or systematic enough to stimulate generalised changes in donor behaviour'.² Only a very weak monitoring framework has been put in place, and consistent adherence to the principles remains a challenge for donor staff. To ensure quality and accountability, donors need to have systems in place that reward high-impact operations, punish low quality and link impact measurement of a funded operation to how well the donor staff in charge of that grant performed oversight during implementation. There is, however, an attribution problem as high-impact operations depend on

¹ DARA, *Humanitarian Response Index 2010*, available at <http://daraint.org/wp-content/uploads/2010/10/Folletto-HRI-2010-INGLES.pdf>.

² Sue Graves and Victoria Wheeler, *Good Humanitarian Donorship: Overcoming Obstacles to Improved Collective Donor Performance*, HPG Discussion Paper, December 2006.

many factors beyond the control of the donor and its staff. Most of the performance frameworks ECHO uses focus on the quality of partners' work, not ECHO's.

The role of outside actors

Donor agencies are part of government administrations which are controlled by the legislatures of their countries. However, very few politicians have a clear idea of how the aid industry works, and nor does the general public. In recent high-profile crises media reports have increasingly focused on what went wrong rather than what worked well. Media attention on aid operations, especially in highly visible crises, is a growing factor influencing accountability by donors, for better or worse. Increasingly, decision-makers within a donor institution are under pressure to do *something*, which can lead to highly visible action that does not necessarily achieve the greatest impact.

The mass media are the most likely source of information for ordinary citizens on the performance of humanitarian aid. Using the media to enhance acceptance of the humanitarian endeavour amongst taxpayers and to raise awareness of how complicated it is to deliver high-quality humanitarian aid is therefore an important task. Public opinion surveys conducted by ECHO regularly show that public acceptance should not be taken for granted, and may well be declining in the light of the current problems facing European economies.³

³ Eurobarometer, *Humanitarian Aid 2010*, available at http://ec.europa.eu/public_opinion/archives/ebs/ebs_343_sum_en.pdf.

Conclusion

It is clear that donors hold a key position in the accountability chain. They can insist that implementing agencies aim for high-quality performance, lobby at the political level for humanitarian space, remind national governments of their responsibility to protect their citizens and push for better accountability within the humanitarian system as a whole. And they must themselves be held accountable. Too often it is left to individual donor staff to put quality and accountability at the core of their work, including their own personal performance. A comprehensive review of the GHD principles, for example on the occasion of their upcoming tenth anniversary, could address this problem.

Donors must find ways to use their leverage wisely and responsibly. Laissez-faire donorship, or even worse awarding funding in order to improve a donor's image or gain public approval, makes donors complicit in supporting system-wide under-performance. Donors can and must use their collective potential to press for more rapid change and better performance. While they should listen to their partners before allocating money, allowing them as much operational independence as possible, donors should exercise as much quality control as necessary to ensure the most effective use of funds for those in greatest need of humanitarian aid.

Corinna Kreidler is Head of the ECHO office in the Democratic Republic of Congo (DRC). She is writing here in a personal capacity.

Accountability: the DEC's experience

Annie Devonport and Cait Turvey Roe, DEC

The core function of the Disasters Emergency Committee (DEC) is to raise funds from the public on behalf of our members following a major emergency.¹ These funds are allocated according to a formula, recalculated annually, that takes account of the relative size of each agency, based on their overseas expenditure. The DEC is, therefore, not a donor but a funder, and has a responsibility to account for how funds are distributed and used down to community level.

To demonstrate accountability the DEC used to commission external joint evaluations. These were generally popular within the sector, but did little to effect change due to their generalised findings. Nor did they help build trust with the public as journalists tended to focus on negative conclusions. This led the DEC's Trustees to consult on an alternative, and a new model for accountability was developed. The last DEC external evaluation, of the Niger crisis response, was completed in 2007.

The DEC Accountability Framework, known as DECAF, has now been in use for four years. Over those four years,

¹ The DEC has 14 members: ActionAid, Age UK, the British Red Cross, CAFOD, CARE International UK, Christian Aid, Concern, Islamic Relief, Merlin, Oxfam, Save the Children, Tearfund, World Vision and Plan International UK.

many DEC members have strengthened their approaches to programme management. This in turn has increased their ability to deliver programme objectives and given them a lever for improving accountability to beneficiaries. This is not to say that there is nothing more to be done: embedding learning and making the participation of disaster-affected communities meaningful are just two of the challenges agencies face in fast-moving, complex humanitarian emergencies.

Developing the DECAF

Led by the DEC Secretariat in consultation with member agencies, a set of principles was agreed to guide the development of the framework:

- Encourage learning *and* accountability, whilst recognising the tensions between them.
- Build on members' own performance management and reporting systems.
- Maintain independent scrutiny by engaging external consultants.
- Ensure that the investment made in the framework delivers benefits for member agencies and the DEC.

A set of objectives for the framework was also formulated

to take account of the need to consider accountability in the round and to incorporate the prevailing thinking on the subject:

- Strengthen the Secretariat’s accountability to donors and member agencies’ accountability to the intended beneficiaries of emergency responses.
- Enable the Board to hold DEC members to account for the effective use of DEC funds and for adherence to DEC membership criteria.
- Establish mechanisms to measure and improve the performance of the DEC Secretariat.
- Maintain an independent overview of collective DEC performance.
- Provide a trusting environment for lesson learning/ sharing between members in order to improve humanitarian responses by separating this from accountability mechanisms.
- Improve the quality of reporting by members and increase the volume of reporting the DEC puts into the public domain

In a series of workshops DEC members identified their key priorities to ensure a quality emergency response. These were described through 35 ‘ways of working’ under five priority areas. As far as possible harmony was sought with other accountability initiatives such as the Humanitarian Accountability Partnership (HAP), with which the DEC shares several members, and Groupe URD’s Quality Compass, with elements of each included. The original five priorities were:

- We use funds as stated.

- We achieve intended programme objectives and outcomes.
- We are committed to agreed humanitarian principles, standards and behaviours.
- We are accountable to beneficiaries.
- We learn from our experiences.

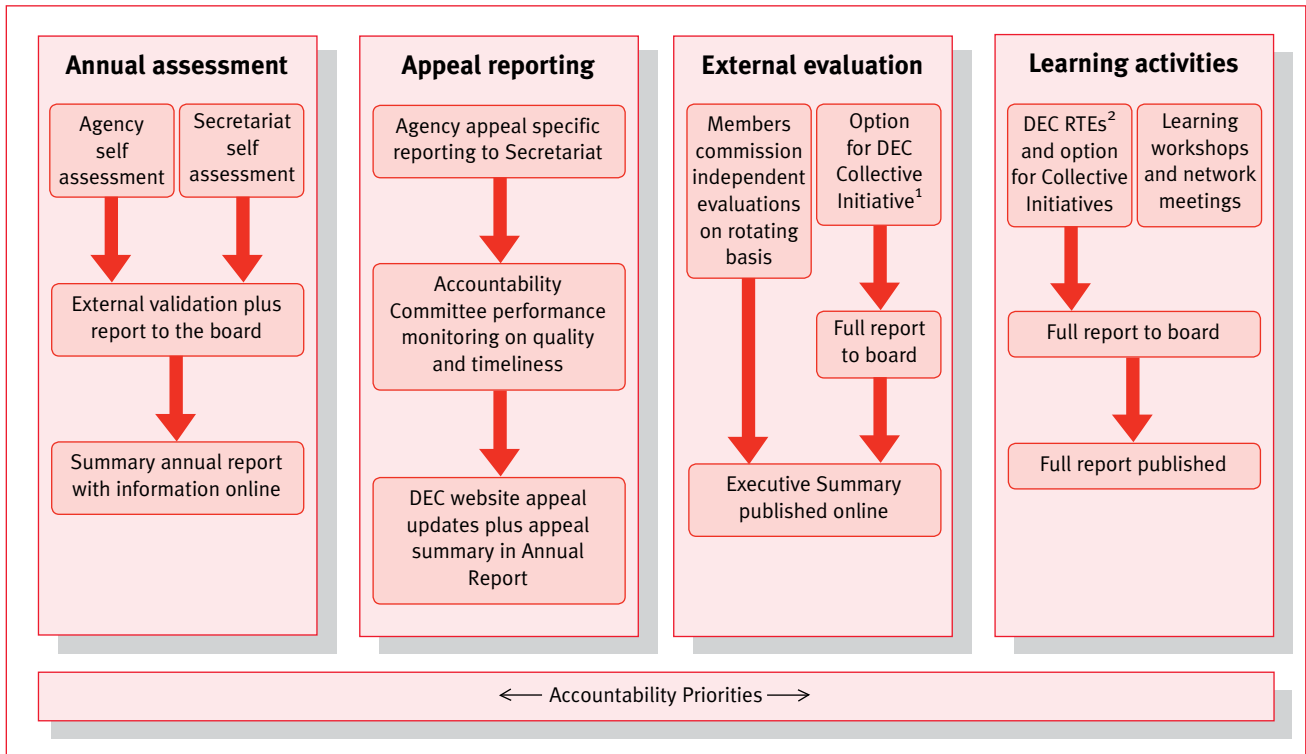
Since 2007, agencies have assessed themselves against the ways of working. Assessment scores are rated Red, Amber or Green, with Red indicating the absence of any policy or procedure, Amber confirming that there is a policy or procedure with some evidence of application and Green showing that there is an assurance mechanism in place to ensure that the way of working is systematically implemented.

To justify their ratings, members are required to submit evidence of policies or procedures, of application and of assurance, drawn from recent DEC-funded emergency responses. Central to the process is the requirement for each member to set out their improvement commitments, in line their own strategic objectives. Evidence is scrutinised and delivery against improvement commitments tracked by an external validator, a role performed by Ernst & Young for the first three years and now by One World Trust.

In addition to these annual assessments, DECAF encompasses a number of activities designed to promote best practice, learning and accountability. The agreed priorities span the four main ‘pillars’ of the framework (as in Figure 1).

1. Annual self-assessments against the DEC accountability priorities and the ways of working.

Figure 1: The DEC Accountability Framework



1 Collective Initiative = joint study or report commissioned by DEC.
2 RTE = Real Time Evaluation.

2. Appeal-specific reporting on plans and progress against these.
3. A rotating system of independent external evaluation.
4. Collective learning activities designed to ensure that DEC members share learning and experiences.

Taking stock

Whilst the core of the assessments did not change over the first three years, the DEC Secretariat continually sought feedback from members. Key messages were that in headquarters evidence collection was found to be resource heavy; for field offices, the process was perceived as largely extractive and therefore not providing any obvious benefits at programme level.

During 2010, the Secretariat facilitated an in-depth review of DECAF, drawing on workshops and a survey of member agency staff as well as discussions with Trustees and external stakeholders. Four clear conclusions emerged from this process:

- The DECAF assessments had led to improvements, particularly around systems for learning and accountability to beneficiaries. However, the priorities needed updating to reflect the new ‘frontiers of best practice’ and to harmonise better with other accountability initiatives.
- The process of the annual DECAF assessments needed adjusting in order to reduce the administrative burden and make the ratings more consistent.
- The DEC’s learning activities (including workshops and collective initiatives) had been successful forums for sharing learning and there was scope for future joint learning.
- The DEC could do more to share information with – and be accountable to – the public.

DECAF 2: refinement and reformulation

In response to this feedback, changes have been made to both the DECAF assessment process and to the ways of working themselves.

Two refinements were made to the DECAF process:

- Sampling. The validators now select a sample of 5–7 ways of working, pulling out those they feel would benefit from particular scrutiny, with evidence now provided to support this subset rather than for all of the ways of working. This reduces the burden and allows for more in-depth analysis of the issues – which the validators can then turn into clear feedback for each agency.
- Peer challenge. In workshops facilitated by the validators, two or three agencies challenge each other



Howardlake (via flickr)

A DEC appeal poster in London

over the strength of their systems and the consistency of their ratings. Trustees also take part in separate peer challenge sessions which bring together two member trustees (i.e. agency chief executives) with an independent trustee to discuss the key issues arising from that year’s assessment.

While generating consensus over changes to the process was relatively straightforward, formulating a revised list of ways of working, which all members agreed represented current good practice, was more challenging.

A recurring theme in these discussions was the diversity of the DEC membership. Our agencies are united by their commitment to humanitarian work but can be divided along various axes when it comes to how they deliver this work. For example, some agencies operate directly in the field while others work only through local partners; some have limited influence over their global families while others sit at the top of international structures; and some are the giants of the sector while others are smaller, with fewer resources and perhaps a narrower focus in terms of location or sector. All of these factors affect what the UK-based agencies see themselves as accountable for and – critically – by whom they can be held to account.

To address these issues we took a further step towards the other initiatives in which our members are engaged: mirroring the HAP benchmarks within our ‘accountability to beneficiary’ ways of working; incorporating ideas from the Sphere Core Standards around coordination, collaboration and local capacity; and making explicit reference to People In Aid. To identify the ways of working which sit beyond the scope of these initiatives, we concentrated on areas where agencies had common aspirations (e.g. value for money) and where the first three years of DECAF showed there was still progress to be made (e.g. learning). While this process led to a very different set of ways of working, at the priority level there

Table 1: Revised priorities for 2011–2012

Priority	Changes
We use our resources efficiently and effectively	New ways of working (WOWs) pick up on the themes of value for money, utilising local capacity and supporting staff
We achieve intended programme objectives in accordance with agreed humanitarian standards, principles and behaviours	WOWs continue to cover identification and communication of standards but now emphasise responding to changing needs as well as contributing to DRR and the resilience of communities, partners and governments
We are accountable to disaster-affected populations	New WOWs mirror Humanitarian Accountability Partnership benchmarks so evidence can be dual-purpose for those agencies that are also HAP members
We learn from our experience – taking learning from one emergency to the next	WOWs continue to cover the identification, communication and application of learning but bring in contributions to peer and sector learning

was only one significant change: a move away from ‘using funds as stated’ towards a more challenging commitment to ‘using resources efficiently and effectively’. This new priority incorporates the themes of value for money, utilising local capacity and ensuring that staff can work effectively (see Table 1).

In December 2010, the DEC Board agreed the new list of 21 ways of working, reduced from the initial 35. Members will self-assess against these for the first time in 2011–12.

Next steps

After a year of reflection and review, we are now looking forward to the first year of DECAF Mark 2 assessments. We are also thinking about two broader challenges which need to be addressed.

First, how can we be more accountable to the public? The DEC is designed to offer a unified appeal for the public at times of emergency; we recognise that with this comes a responsibility to tell the full story to the public – to give positive feedback on what their generosity has delivered, but also to explain the challenges. The DEC has just launched a new website (www.dec.org.uk) and we plan to

use this to put more information – in an accessible manner – into the public domain so that we can use our work around quality and accountability to build the public’s trust and to educate our donors about the complexity of humanitarian work.

The more abstract challenge, which the DECAF assessment process throws into the spotlight, is the complexity of accountability within large organisations. The DECAF assessments demand that agencies explain how they know that the high standards they strive for are being reached on the ground. With increasingly global structures, overseas sister agencies and myriad partners, for many agencies lines of accountability now lead to points outside of their direct control. Given this, the question of what effective global accountability looks like and how change can be achieved within global organisations is critical to our improvement agenda. While we don’t have all the answers here at the DEC, we are looking forward to tackling these questions in conjunction with our members.

Annie Devonport is Humanitarian Programme Advisor at the DEC. **Cait Turvey Roe** is the DEC Accountability and Audit Manager.

A framework for strengthening partnering accountability and effectiveness

Mike Wisheart and Amy Cavender

World Vision has developed a framework to strengthen the organisation’s accountability and effectiveness when partnering with other organisations or institutions. The approach is built on the understanding that an NGO is accountable to its core constituency (i.e. the communities it serves), its partners in development work (from all sectors of society), its donors, its staff and volunteers, states and public authorities and other actors in the public sphere (such as other NGOs and the media). In addition, NGOs are accountable to themselves – to their goals, values, and mission:

Being accountable means that we have a shared commitment to learning as the path to excellence and to integrity in fulfilling commitments to stakeholders; we measure and report on our performance against agreed principles, policies and practices; regardless of our position in the organisation, we acknowledge we have responsibility to others and accept the responsibility for our actions and their implications.¹

¹ From World Vision International’s Accountability Framework, which can be found in WVI’s *Accountability Report 2010* (<http://www.wvi.org/wvi/WVIAR2010.nsf>).



Julien Harms (via flickr)

Getting feedback in North Kivu, DRC

Participation and partnerships/relationships are a key focus area for accountability. When partnering with external organisations, it is recognised that, more often than not, attempts by single organisations (or single sectors) to deal with poverty and carry out humanitarian action in this complex world have failed. Collaborative approaches that include all sectors of society are essential.

This is particularly important when seeking greater impact, influence, innovation and adaptive capabilities by leveraging complementary competencies, roles and perspectives. While the transaction costs and risks (loss of reputation, co-optation) are significant, World Vision is nevertheless committed to adopting a deliberately collaborative approach.

Table 1: Revised priorities for 2011–2012

	Rationale
Equity	Leads to mutual respect between partners because they recognise the value and contribution that each party brings and its importance in the relationship.
Transparency	Openness and communication lead to trust between partners, providing the foundation to strengthen the relationship, deliver measurable, accountable results and potentially lead to further opportunities for collaboration.
Mutual benefit	Leads to sustainability as all partners (including those that represent the community) recognise the value-added from the outputs of the relationship and endeavour to maintain these results.
Complementarity	Maximises the benefits which derive from diversity by building upon each organisation’s complementary mandates, capabilities, resources and perspectives.
Strategy-led	Ensures that partnering activities are aligned with the strategies and missions of the partner organisations.
Results-oriented approach	Recognises that effective action must be reality-based and action-oriented, with tangible and measurable results achieved for partners, stakeholders and beneficiaries. Monitoring, joint learning and evaluation are critical components.
Responsibility/mutual accountability	Organisations have an ethical obligation to each other, their partners and their stakeholders to accomplish their tasks responsibly, with integrity and in a relevant and appropriate way. They must only commit to activities when they have the means, competencies, skills and capacity to deliver on their commitments. Clear roles, responsibilities and effective governance underpin this.

The Framework

Effectively embedding core principles is critical to driving successful and accountable partnerships. The partnering principles World Vision has adopted, drawn from a review of best practice, are contained in Table 1. They are fundamentally influenced by the Principles of Partnership endorsed by the Global Humanitarian Platform and those emphasised by The Partnering Initiative (TPI).²

² See <http://www.globalhumanitarianplatform.org/pop.html> and <http://www.ThePartneringInitiative.org>.

It is sometimes difficult to translate lofty principles into concrete actions and behaviours. This framework therefore concentrates on embedding the partnering principles by aligning a series of pragmatic guidance statements to each of them (Table 2). The guidance statements are based on promising practice from internal and external sources (particularly from AccountAbility's Partnership Governance and Accountability (PGA) Framework³ and key learning reported by TPI.

³ See <http://www.pgaframework.org/index.asp>.

Table 2: Partnering accountability and effectiveness framework

Partnering principles	Guidance statements	New	Growing	Mature
1. Equity	1.1 Steps have been taken (e.g. explicitly valuing a wide range of contributions, careful positioning of the role of the broker) to mitigate potential imbalances of power between partners that may have negative consequences.	✓	✓	✓
	1.2 Key protocols or policies are in place, including methods of decision-making and reaching agreement.	✓	✓	✓
	1.3 A code of conduct (or other equivalent policy) has been agreed to increase the likelihood of fair dealing among partners and stakeholders.		✓	✓
	1.4 An approach to stakeholder engagement has been adopted that is specifically responsive to imbalances of power between the collaboration and its stakeholders, with an acknowledgement of issues and significant action.		✓	✓
2. Transparency	2.1 A partnering agreement, MoU, and/or charter or equivalent has been developed outlining the collaboration's mandate and partner roles and responsibilities.	✓	✓	✓
	2.2 The collaboration and/or its governing body, if it has one, has a schedule of regular meetings to drive and monitor progress.	✓	✓	✓
	2.3 The collaboration has in place an agreed written plan for problem identification and resolution of disputes.		✓	✓
	2.4 At least once a year, the collaboration publicly discloses aspects of its performance (including financial reporting) that are of material importance to key stakeholders.		✓	✓
3. Mutual benefit	3.1 The collaboration has agreed on a plan for sharing or allocating the costs, risks and rewards of the collaboration.	✓	✓	✓
	3.2 Negotiations and development of the partnering agreement (or equivalent) have intentional focus on creating a collaboration approach which delivers against individual partner organisation interests and objectives.	✓	✓	✓
	3.3 In addition to periodic reviews of the collaboration's objectives, individual partner objectives are reviewed on a regular basis.		✓	✓
	3.4 Relationships between the partners are checked using a health-check tool or equivalent on at least an annual basis.		✓	✓
4. Complementarity	4.1 The partners have been clearly identified, including a process exploring why each is needed to achieve the joint objectives, and how they each add value/complement each other.	✓	✓	✓
	4.2 A capacity/competency evaluation has been conducted with regard to individual partners. Diversity in all its dimensions is valued.		✓	✓
	4.3 The collaboration has in place a method for regularly evaluating the appropriateness of each partner to the collaboration.		✓	✓
	4.4 The partners have reviewed which, if any, organisations are not members. They have made a judgement as to whether the non-participation of these organisations may be an obstacle to achieving the collaboration's objectives.			✓

(continued)

Table 2 (continued)

Partnering principles	Guidance statements	New	Growing	Mature
5. Strategy-led	5.1 The collaboration’s goal is sufficiently aligned to the strategy of each partner.	✓	✓	✓
	5.2 There is a mission statement, vision and stated purpose or mandate included in an appropriate document.	✓	✓	✓
	5.3 Plans for financial sustainability are outlined; i.e. how the collaboration will sustain itself (for its intended life in as far as this can be judged) in terms of financial resources.		✓	✓
	5.4 The collaboration identifies its stakeholders’ expectations in significant areas of social, economic and environmental impact arising from its strategy.		✓	✓
6. Results-oriented approach	6.1 The partners have reviewed options and agreed on a specific form of collaboration – one that is best suited to its objectives and that is practical.	✓	✓	✓
	6.2 Specific objectives or deliverables are detailed in clear terms and a formal system for periodic evaluation of management performance is in place.	✓	✓	✓
	6.3 The collaboration has an embedded process to support reflection and learning.		✓	✓
	6.4 The collaboration and/or its governing body has identified its internal and external risks, practicing risk management and with internal controls in place.			✓
7. Responsibility/mutual accountability	7.1 Due diligence has been performed by partners prior to forming the collaboration and is reviewed as appropriate.	✓	✓	✓
	7.2 The duties, deliverables and responsibilities of each partner are defined, as are clear consequences in the event a partner fails to meet the obligations for which it is responsible.	✓	✓	✓
	7.3 The management structure has developed detailed internal controls to assure financial integrity.		✓	✓
	7.4 The collaboration has developed a governing body (if appropriate), provides effective governance, is credible, reflects its stakeholder groups and has a formal process for periodically examining its own performance.			✓

Complicating factors

In developing this framework, several organisational realities and/or complicating factors had to be taken into account.

Learning rather than compliance

Discussions with leaders and staff highlighted reluctance to adopt what was at first called a set of *standards*. Concern was expressed over the organisation’s ability to effectively build and seek compliance with a set of standards without first having developed a deeper body of experience and knowledge. Therefore, an alternative approach was adopted which avoids compliance and standards terminology at this stage. It instead builds on the ‘commitment to learning’ articulated in the organisation’s approaches to both accountability and partnering. The framework has been positioned in the context of ‘learning’, and the adoption of ‘promising practice’ through a series of guidance statements. A period of learning based on the proposed framework is planned, after which a set of standards may emerge.

The collaboration continuum

External relationships come in all shapes, sizes and forms, including supplier–vendor, donor–grantee, networks, coalitions, strategic alliances and partnerships. These collaborative forms differ in their key characteristics and

in their accountability requirements and imperatives. It is expected that the framework will be very relevant for partnerships and more integrated collaborations, like coalitions, but significantly less relevant for networks, for example. As the use of the framework is reviewed, applicability across collaborative forms will be explored.

Life stages

External relationships, like relationships in general, are dynamic rather than static. As the parties involved grow in mutual understanding and trust, relationships and behaviours can deepen and mature. This framework identifies three life stages: New (0–1 year), Growing (1–3 years) and Mature (3 years-plus). These categories, which will be reviewed as experience is gained on their usefulness, are meant for guidance only. The three columns on the right of the table indicate which of the guidance statements are expected to be in place depending on the collaboration’s level of maturity. Practitioners will be expected to use their judgement, in dialogue with the other parties, in applying these life stages to their particular collaboration.

Local versus global

World Vision, like many INGOs, is a complex organisation. One of the complexities is the number of levels it works at: local/community; sub-national/provincial; national;

sub-regional; regional; and global. Developing a series of frameworks tailored to each of these levels is not a realistic proposition. Instead, for now, one framework has been developed. Practitioners will therefore need, in the vast majority of cases, to interpret/adapt each of these guidance statements for their situation – whether that is a global multi-stakeholder partnership or a local-level bilateral collaboration. Clearly, the resources, infrastructure, systems and protocols will vary significantly across these two domains.

Moving forward

Organisations that work successfully in collaborative arrangements have learnt how to deal with issues of

power and control. Working effectively with others means developing joint understandings of approaches, concepts, tools and systems. Imposing these understandings on others is disempowering and harms the partnership. With this in mind, the framework will need to be introduced to partners in collaborative arrangements with sensitivity and a flexible attitude that is open to adapting it. How this should be done will be explored in the next 12–24 months – a period of adopting, adapting, testing and retesting assumptions.

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Community feedback and complaints mechanisms: early lessons from Tearfund's experience

David Bainbridge, Tearfund

Tearfund's approach to feedback and complaints handling is part of a broader organisational commitment to accountability, which promotes information sharing, transparency, participation and learning with project participants. Feedback and complaints mechanisms are based on community preferences and cultural norms to ensure that they are accessible, safe and easy to use. All feedback is recorded, responses are given to community members or groups and a monthly report of the feedback received and responses given is sent to Tearfund's head office in London. Many project teams include staff with specific responsibility for supporting the mechanism, such as Accountability Officers or Community Animators.

Tearfund has established these systems in project locations in South Kivu in the Democratic Republic of Congo (DRC), West and South Darfur in Sudan, Upper Nile and Bahr el Ghazal in South Sudan and Kapisa, Kandahar and Jawzjan in Afghanistan. This article presents a synthesis of Tearfund's experiences across these four emergency programmes, sharing the challenges encountered and suggesting recommendations.

Overview of feedback received

In DRC, the Beneficiary Accountability Officer (BAO) and Community Animators received a regular flow of feedback from communities. This appeared to be open and honest, including many negative comments. Communities reported misconduct by Tearfund staff and by their own committees, and there were complaints about targeting and project design. Communities often used the mechanism as a means to request further services.

In Darfur, the majority of feedback was either to do with issues that were beyond Tearfund's ability to address, or were requests for the provision of services. In some project sites complaints included issues relating to the conduct of staff, and in others feedback concerned project

management and targeting criteria. Most was verbal. Complaints about staff conduct were addressed through existing performance management systems or escalated for investigation, depending on the seriousness of the complaint; one complaint about an alleged fraud was investigated and the staff member was dismissed.

In South Sudan, the vast majority of feedback was given verbally. Requests for the provision of services were common, and complaints and enquiries were mostly about project design, such as when a grinding mill was going to be repaired or why Tearfund was ending work on primary healthcare in a particular location.

In Afghanistan, virtually all of the feedback was given verbally and no negative comments or complaints were received. Rather, the feedback focused on appreciation for services given, for instance disaster risk reduction training, distributions of water filters and requests for the extension of these services.

Challenges

A number of challenges in establishing effective feedback and complaints systems across the four Tearfund programmes have emerged.

Challenges with communities

Tearfund has found that expectations are raised when communities are asked for feedback, as people then feel disappointed or ignored if they perceive that no action is taken in response and lose faith in the feedback system. In Darfur, for instance, people asked Tearfund to do things that were outside of its sectoral focus and expertise. Particular problems arose in insecure locations where it was difficult for staff to visit the communities sufficiently regularly to follow up on feedback received. In Afghanistan, community members appeared to fear losing assistance if they made complaints. In many operating environments

it takes considerable time to build trust and confidence in the transparency of the process, especially in places where corruption or conflict lead many people to doubt that such a process can exist.

Complaints against community leaders pose another challenge to feedback mechanisms. Examples include complaints that a community committee was given money to pay technicians to dig latrine holes but instead kept the money for themselves, or that a community leader did not treat community members with respect. It is difficult for people to raise concerns in public meetings when community leaders are present.

Traditional community dispute resolution systems often work through traditional leaders and community members may be unfamiliar with a system that encourages people to complain directly to an NGO. Holding separate meetings for women and girls, men and youth is a more effective way of managing feedback and complaints concerning community leaders.

In DRC, Sudan, South Sudan and Afghanistan there is a predominantly verbal tradition in many areas and literacy rates are historically low. A particular challenge is managing confidentiality when most feedback is given verbally. In DRC, staff found large community meetings to be a very effective way of sharing project information, but some complaints and feedback were better dealt with in smaller meetings. There may also be issues relating to gender, age or class which prevent particular community members or groups from speaking in public meetings; again, holding separate meetings for different groups can help overcome this barrier. Extra effort is also needed to ensure that verbal feedback is recorded by project staff and included in reporting, and managers need to ensure accuracy when translation is required.

Challenges with staff

There has been a tendency for some staff to focus on the 'hardware' elements of the system, such as notice boards and suggestions boxes, without fully grasping the underlying principles and values that form the foundation of effective feedback and complaints systems. This may be due to limited induction. Staff have not always asked different groups how they prefer to feed back or make complaints, which can result in the mechanism not meeting their needs. Tearfund has found that some staff do not feel confident that they understand every aspect of the overall project, and so feel unable to respond to feedback about other aspects. Some staff may feel threatened and may interpret complaints as a poor reflection on their performance. As a result they may not welcome feedback and may fear the implications of being reported



Alison Caxton

Tearfund staff at a beneficiary accountability training session

on by communities or by their colleagues. In this context lack of support from managers has a big impact on the effectiveness of accountability systems and has been cited as a key constraint by staff.

Lastly there are issues of staff capacity. Senior managers in DRC highlighted the value of having a dedicated Beneficiary Accountability Officer (BAO) budgeted into each project, and have trialled combining these responsibilities with other functions such as monitoring and evaluation and community mobilisation. Community Animators at the village level support mobilisation and reinforce the feedback system to the BAO. In Afghanistan the accountability focal point in each field location has not been a dedicated role and it has proved difficult to find the right balance between having dedicated accountability staff and making sure that accountability is understood as everyone's responsibility. There is also a danger of a dedicated role being perceived by the rest of the team as the 'Accountability Police'. In many programmes projects cover wide geographical areas, making it impossible for one BAO to get round to all the communities or project sites regularly enough. In such instances it would be preferable for other staff also to gather feedback and respond to it. In highly insecure project locations further work is needed to develop accountability systems and structures such as Beneficiary Reference Groups (BRGs – groups of community members who gather feedback and pass it to Tearfund).

Recommendations for improvement

In light of the challenges outlined above, the following are suggested recommendations for the establishment or improvement of feedback and complaints systems.

1. **Develop comprehensive induction programmes for staff**
Induction needs to be improved to include more information about projects, more detail on the basics of accountability and steps to address staff fears about the feedback system. Refresher training is needed to keep staff current

Box 1: Case examples from Tearfund's experience

- Following a seeds and tools distribution in Omdurman, South Sudan, villagers complained to Tearfund that the number of beneficiaries was fewer than in other villages. Project staff responded by explaining the selection criteria to clarify how beneficiaries were chosen.
- In DRC, following an animal fair where goats were distributed, some recipients reported having to sell the animals they had received because they could not transport them back to their villages. In response the project team reviewed how the fairs were organised.
- In Ed Daein, Darfur, Tearfund received verbal complaints that the seeds provided to farmers as part of a food security project were not what had been agreed with project staff. The project manager looked into the complaints and followed up with the seed supplier, who acknowledged the mistake and agreed to replace the seeds with the type of sorghum seed originally agreed. This was reported back to the community members and subsequent feedback confirmed that they were satisfied with the outcome.
- A livelihoods project in Afghanistan provided training and support to women in wool spinning. Participants asked Tearfund to supply chairs for them to use as they worked the spinning wheel (many were standing or sitting on jerry cans). The project team explained that the budget was fully spent and so it was not possible to provide immediate additional assistance. However, they confirmed that chairs would be provided in future livelihoods projects.

and to address staff turnover. It is important to make induction sessions creative, and to use practical examples to build enthusiasm behind accountability. Having dedicated capacity to focus on staff induction, training and follow-up will strengthen the overall effectiveness of the feedback and complaints system. This has cost implications, unless the extra responsibilities can be undertaken within existing roles.

2. Emphasise accountability within line management

Line managers need to reinforce the importance of accountability systems alongside their other responsibilities, and to lead by example. This can be done through existing performance management and appraisal systems, for example by including the establishment and promotion of the accountability system as part of a staff member's objectives. It may be useful to introduce a checklist for managers to review levels of compliance with the requirements of feedback and complaints systems.

3. Ensure adequate capacity to manage the feedback and complaints system

Ensure that roles and responsibilities are clear and that there are sufficient staff in Accountability Officer- or Community Animator-type roles. In Tearfund's experience, donors have been willing to fund such roles and have been supportive of the approach. Develop community reference groups so that representatives can be fully involved with the NGO in reviewing and responding to feedback and complaints.

4. Ensure an equivalent feedback and complaints system for staff

An effective staff feedback and complaints mechanism should be in place. Such a move will match the organisation's commitment to listening to and responding to community feedback and complaints with a commitment to listening to its own staff. This will reinforce consistency in good practice across the organisation's policies and procedures.

5. Ensure timely responses are provided to the feedback and complaints received

There is a general recognition that the more effectively the NGO responds to feedback the more community members will be encouraged to use the system and any initial reservations or suspicion will be reduced. Little or no negative comment should not be interpreted as a community being completely happy with a project, but rather that the mechanisms in place to facilitate their feedback and complaints are not yet fully functioning. Factors such as the length of time the NGO has been working on the ground have been found to be less significant than the attitude and commitment of project staff.

6. Provide clarity on the scope of feedback and complaints

Clarify that feedback is encouraged on poor behaviour, poor quality and poor delivery. Whilst this is an enormous challenge in many of the environments where humanitarian agencies work, it is vital to manage expectations so that communities understand what constitutes a complaint and what response they can expect from the NGO. This should be part of a broader commitment to providing clear information on the organisation, its mandate and its goals. It is also vital that the message is reinforced that communities are free to give their honest opinions, and that they will not be penalised or assistance withheld as a result of negative feedback. It is also important to distinguish between the feedback and complaints system and regular project monitoring and evaluation, with clarity for staff on what each is intended to address.

David Bainbridge is Tearfund's International Director.

Sexual exploitation and abuse by UN, NGO and INGO personnel: a self-assessment

Inter-Agency Standing Committee Task Force on Protection from Sexual Exploitation and Abuse

Sexual exploitation and abuse by humanitarian workers and peacekeepers represents a catastrophic failure of protection. It brings harm to the very people the UN, NGOs and international organisations are mandated to protect and jeopardises the reputation of these organisations. It also violates universally recognised international legal norms and standards. Although not a new phenomenon, sexual exploitation and abuse was brought to the forefront of public attention in 2002 following allegations of widespread abuse of refugee and internally displaced women and children by humanitarian workers and peacekeepers in West Africa. Since then, the international community has taken action to address the shortcomings of existing mechanisms to prevent such abuses.

In 2009, members of the Executive Committees on Humanitarian Affairs and Peace and Security (ECHA/ECPS) Task Force on Protection from Sexual Exploitation and Abuse (PSEA) requested the Inter-Agency Standing Committee (IASC) to undertake a review of efforts in this area and to identify the extent to which policies have been implemented. The review, completed in 2010, also looked at the impact of the activities, policies, strategies and tools the Task Force had undertaken or developed, including the High Level Conference on PSEA in December 2006, the production of the awareness-raising film *To Serve with Pride*, the adoption of the United Nations Victim Assistance Strategy in December 2008 and the launch of the PSEA website (<http://www.un.org/en/pseataskforce>).

The review included personnel from the United Nations, non-governmental organisations, the International Organisation for Migration and the International Federation of the Red Cross, as well as peacekeeping and development partners. An external review facilitator worked with 14 agencies to help them conduct self-assessments of their own policies and guidelines and the direction and support being provided to their field offices. Field research was conducted in the Democratic Republic of Congo and Nepal, and desk research was carried out for five additional countries.

Findings and challenges

The results of the review indicated that much more needed to be done to protect affected populations from sexual exploitation and abuse by humanitarian actors. It also found that, while progress had been made on establishing policies, this had not translated into adequate managerial and staff understanding and acceptance of those policies. Managers and other personnel demonstrated an inconsistent understanding of their obligations with regard to the prevention of sexual exploitation and abuse by their own staff.

The most critical gap in organisational support to PSEA was visible senior management leadership. The review found



UN Photo/Marie Frechon

A shelter for victims of sexual abuse in Goma, DRC

‘My friends and I were walking by the National Palace one evening when we encountered a couple of humanitarian men. The men called us over and showed us their penises. They offered us 100 Haitian gourdes (\$2.80) and some chocolate if we would suck them. I said no, but some of the girls did it and got the money.’

– 15-year-old girl, Haiti.

Source: *No One To Turn To: The Under-reporting of Child Sexual Exploitation and Abuse by Aid workers and Peacekeepers*, Save the Children UK, 2008.

that it was crucial that senior managers actively promote PSEA policies and proactively support PSEA activities, while holding their staff accountable for the implementation of these measures. The review also highlighted that, with very few exceptions (namely peacekeeping missions), community-level awareness-raising and complaints mechanisms were not in place. Without these, affected people cannot lodge complaints. These findings reinforced earlier studies highlighting under-reporting of allegations of sexual abuse at the hands of aid workers.¹

Another key finding was that preventive and responsive measures had not been implemented effectively. Head offices had not given clear directives to staff in the field

¹ See *No One To Turn To: The Under-reporting of Child Sexual Exploitation and Abuse by Aid workers and Peacekeepers*, Save the Children UK, 2008; and *To Complain Or Not To Complain: Still the Question. Consultations with Humanitarian Aid Beneficiaries On Their Perceptions of Efforts To Prevent and Respond To Sexual Exploitation and Abuse*, HAP International, June 2008.

on PSEA or supported their directives with adequate guidance and training, and managers were not being held accountable for policy implementation.

Recommendations

The review recommends that resourcing for the implementation of fundamental PSEA instruments should be provided by adding PSEA components to every Consolidated Appeal Process and Flash Appeals, and through pooled funding to support inter-agency PSEA work. The review also recommends a relaunch of the Secretary General's Bulletin on sexual exploitation and abuse (ST/SGB/2003/13), which is not sufficiently known or understood at field level. The campaign should be reinforced by the prominent participation of senior humanitarians and agency leaders.

While the review asserts that the fundamental responsibility for ensuring that PSEA obligations are met must remain at the individual agency level, it concludes that the advancement of PSEA within the humanitarian community would be best served if the IASC were to resume its leadership on the issue, in order to engage humanitarian leaders at the highest level. Although the main focus under the Task Force is the humanitarian arena, membership also includes peacekeeping and development actors so that the issue is addressed in all areas and partnerships. In addition to the necessary scale-up at individual agency level, the review proposes a pilot in five locations to put PSEA mechanisms in place and to monitor outcomes.

Based on the recommendations of the review, the IASC created a new Task Force on PSEA, involving all IASC members (the UN, NGOs, the IOM and the Red Cross Federation) and development and peacekeeping agencies. The objectives of the Task Force are three-fold:

- to strengthen leadership on PSEA by supporting agency heads to implement PSEA obligations;
- to support field offices in implementing community-based complaints mechanisms (including victim assistance); and
- to support agencies in institutionalising PSEA within their organisation.

Global activities and progress on PSEA

Individual organisations have engaged in several activities on PSEA, including awareness-raising sessions for staff and securing senior management support. Examples include a UN Development Programme (UNDP) global awareness campaign in October 2010; meanwhile, the Interaction Sub-Working Group on Sexual Exploitation and Abuse has developed a *Step by Step Guide to Addressing Sexual Exploitation and Abuse*, a tool for NGOs to develop policies and procedures to address SEA within their organisations, and a programme to build the capacity of NGOs to address SEA through the development of curricula and e-learning materials, as well as hosting skill-building workshops.²

² There are several additional resources and examples of good practice on the Task Force website at www.un.org/pseataskforce.

Following the HAP-commissioned study *Change Starts with Us, Talk to Us!*, published in 2010, the findings of the IASC review and discussions with stakeholders, a change in the HAP Statute was proposed to HAP members during the General Assembly held in Geneva on 13 May 2011.³ In particular, it was proposed that the HAP membership obligations be expanded to include the requirement to have a staff Code of Conduct in place which refers specifically to sexual exploitation and abuse. This was to be included in agencies' existing accountability frameworks and annual progress reports to HAP. Members accepted this change at the General Assembly. HAP also organised a conference on PSEA in May 2011 to reaffirm the role and commitments of senior managers, to present an update on best practice and to establish consensus and collaboration between all the key stakeholders to strengthen action for PSEA.

UN peacekeeping efforts

In peacekeeping missions considerable resources have been devoted to ensuring that managers are trained, receive support and are required to ensure that mechanisms on protection from sexual exploitation and abuse by mission personnel are in place. Leaders within UN peacekeeping missions are aware that they will be held accountable through their performance management systems should they fail to implement measures to prevent sexual exploitation and abuse.⁴

The Conduct and Discipline Unit (CDU) was formally established in the Department of Field Support in 2007 following the initial formation of a Conduct and Discipline Team in the Department of Peacekeeping Operations in 2005. CDU maintains global oversight of the state of discipline in all peacekeeping operations and special political missions. It provides overall direction for conduct and discipline issues in field missions, including formulating policies, training and outreach activities and handling allegations of misconduct. Conduct and Discipline Teams (CDTs) in field missions act as principal advisers to the heads of mission on conduct and discipline issues involving all categories of personnel. The CDTs address all forms of misconduct by United Nations peacekeeping personnel, including sexual exploitation and abuse.⁵

Kenya's In-Country Network⁶

Twenty-six agencies have joined together to form an In-Country Network on Protection from Sexual Exploitation and Abuse (ICN PSEA) in Kenya. Established after the violence that followed elections in 2007, the ICN is designed to strengthen the quality and accountability of humanitarian partners in Kenya. The Network functions under the auspices of the Resident Coordinator, and is co-chaired by the Kenya Red Cross Society and the UN Office for the Coordination of Humanitarian Affairs (OCHA). Its members include UN agencies, government ministries, civil society organisations and international NGOs.

³ *Change Starts with US* is available at <http://www.hapinternational.org/pool/files/change-starts-with-us.pdf>.

⁴ For additional information see <http://cdu.unlb.org>.

⁵ See <http://cdu.unlb.org/AboutCDU/MissionsCoveredByConductandDisciplineTeams.aspx>.

⁶ Information shared by Christine Uyoga, National Coordinator, PSEA.

The ICN is the primary body for coordination and oversight on preventing and responding to sexual exploitation and abuse by international or national staff of the UN or affiliated organisations. Its members meet every quarter to discuss issues, plan joint activities and make recommendations on particular accountability and quality issues. Activities of note include a presentation of the Teachers Service Commission of Kenya (Ministry of Education) to share the results of an overview of its procedures and policies for addressing child sexual abuse by teachers. The Commission is now creating awareness and sensitising other Ministry of Education departments and affiliates. The National Council for Children's Services, the Department of Children's Services (Ministry of Gender and Children's Affairs) and the Teacher Service Appeals Tribunal have all become members of the ICN. The Network is also training representatives from the Ministry of State for Special Programmes and the National Disaster Operations Centre on how to mainstream PSEA while responding to the current drought emergency. UNHCR is working with the Kenya Police to increase border patrols and deploy female officers in Northern Kenya (Dadaab).

PSEA Network in Liberia

The network on protection from sexual exploitation and abuse in Liberia includes international NGOs and UN member organisations. In June 2006, the UN country team

pooled funds to hire a full-time expert on protection from sexual exploitation and abuse by its own personnel. This Coordination Officer brought together UN agencies and NGOs to oversee the implementation of the UN Secretary-General's Bulletin on special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and the zero-tolerance policy on sexual exploitation and abuse. Since 2008, the new Coordinator is a United Nations Volunteer, but is still paid for through pooled funds and continues to work closely with the UN Mission in Liberia (UNMIL) and NGO partners. The national sexual and gender-based violence task force is chaired by the Ministry of Gender and meets monthly. Its membership includes UN agencies and national and international NGOs, in addition to representatives of the government of Liberia.

Ways forward

The IASC Task Force on Protection from Sexual Exploitation and Abuse has prepared a funding proposal for a pilot project to develop and implement community-based complaint mechanisms. According to the co-chairs: 'We are convinced that if we ask the communities what mechanisms they would feel safe to report misconduct by our own staff we will be able to not only address underreporting but also have an immense preventive impact'.

Corruption in the NGO world: what it is and how to tackle it

Jérôme Larché

Corruption is a sensitive issue in the NGO world. Humanitarian actors need to understand what corruption is, recognise the forms it can take in humanitarian response, determine its true scale and better understand the conditions which lead to it. They also need to identify what mechanisms need to be put in place or strengthened to guard against corruption, even in the most difficult contexts. Mitigating against corruption is necessary if NGOs are to achieve both operational efficiency and accountability to their stakeholders. However, it is also important to recognise that adopting a proactive and transparent approach to dealing with corruption may involve short-term risks to an NGO's reputation.

What is corruption?

Transparency International (TI) defines corruption as 'the abuse of power or position for private gain'.¹ This covers 'active corruption', such as bribery, and 'passive corruption', or allowing oneself to be bribed, as well as misappropriation. The exact scale of the problem in the humanitarian aid sector is by its nature very difficult to determine, but is assumed to be at much lower levels than corruption in the private commercial sector.

Another model of corruption takes into account the

¹ Transparency International, *Global Corruption Report*, 2006.

sources from which these risks emanate.² 'Contextual' corruption is linked to the environment surrounding the intervention (corrupt regimes, governments, police forces). 'Systemic' corruption refers to the humanitarian system, with its multiple, interacting and interdependent actors. 'Intra-organisational' corruption is linked to the constraints inherent within each NGO (human resources, active prevention strategies against corruption risks, verification procedures). This more operational model can help in prioritising and identifying NGOs' scope of action in light of these risks. Thus, while NGOs have little hope of eradicating contextual corruption, they can and should take steps to prevent or address corruption within their own organisations.

A number of factors which can lead to corruption in humanitarian operations have also been identified.³ These include lack of planning (or even the impossibility of planning), the number of humanitarian actors present and the financial resources at stake. The way in which

² Nicholas Stockton, *Preventing Corruption in Humanitarian Relief Response*, ADB/OECD Anti-Corruption Initiative for Asia and the Pacific, September 2005, <http://www.oecd.org/dataoecd/63/49/35592702.pdf>.

³ Daniel Maxwell et al., *Preventing Corruption in Humanitarian Assistance: Final Research Report*, Feinstein International Center, Humanitarian Policy Group and TI, 2008.



Images_of_money (via flickr)

Corruption in humanitarian aid: still a taboo?

the international humanitarian system has developed in recent years, including the exponential growth in the number of NGOs and the development of the humanitarian 'industry', has also been a contributing factor. Finally, we should not forget that corruption exists in developed countries, as well as developing ones.

Corruption and humanitarian aid: new dilemmas?

The number of NGOs has grown exponentially over the last 20 years, as has the scale of resources available. In 2010, it was estimated that humanitarian spending reached just shy of \$17 billion.⁴ Some NGOs have become transnational, with very large budgets. One American NGO, World Vision International, has a budget topping \$2.6bn.

NGOs are often reluctant to talk about corruption for fear that it will lead to bad publicity and, consequently, a loss of funding. Working across borders to reach people in need can also give rise to allegations of corruption. The degree of confidentiality necessary to negotiate with those who control access can sometimes make transparency difficult to achieve. Moving clandestinely across borders to access affected populations, as NGOs have done over the years in many conflict situations, can also raise questions about the legitimacy and legality of such action. During the Afghan war in the 1980s, for instance, the Soviet-allied government in Kabul did not want humanitarian actors in Afghanistan, particularly in areas controlled by resistance factions. In this context, humanitarian NGOs had no choice but to cross the Pakistan–Afghanistan border illegally (without permission), through Peshawar and the North West Frontier Province. When humanitarian personnel were captured and held hostage by Soviet or Afghan forces, NGOs argued that the illegality of their actions did not decrease their legitimacy.

⁴ Development Initiatives, *GHA Report 2011*, <http://www.globalhumanitarianassistance.org>.

Humanitarian organisations cannot ignore the possible consequences of paying bribes or illegal taxes, especially in armed conflicts. Choosing to pay an illegal tax or bribe (in cash or in kind) when confronted by armed guards at a checkpoint may enable the organisation to access people in need, but can be misinterpreted as corruption. Choosing not to pay can mean that humanitarian needs go unmet and that lives may be lost or the risk of harm increased for NGO staff.

NGOs must widen the scope of risk assessment to consider whether their programmes are vulnerable to corruption, such as theft or misappropriation of funds or in-kind goods by warring parties, real or perceived inequities in the distribution of aid and sexual abuse and exploitation of beneficiaries by agency or partner staff. While every situation is different, in all cases NGOs have to balance their commitment to humanitarian principles with the need to control the risk of corruption so as to be truly accountable to their beneficiaries and donors. They should also be transparent with stakeholders about these challenges, and how they may affect decisions about whether or not to continue their work.

Still a taboo?

Some NGOs, particularly in Nordic countries, have chosen to publicise the results of corruption cases as well as the anti-corruption policies that they have implemented. For example, DanChurchAid (DCA) has a website page detailing corruption cases within the organisation and how they were dealt with.⁵ Despite the financial crisis that began in 2008, DCA increased its 2009 budget to 498 million DKK (about \$123m), a third of which came from private donors (the same proportion as in 2008). Being transparent about corruption does not appear to have negatively affected donor perceptions of DCA. Nonetheless, many NGOs believe that reporting cases of corruption is a major risk with potentially irreversible consequences for humanitarian organisations and their activities. They fear that such cases can undermine their credibility and reputation (particularly with the media), as well as discouraging public and private donations. In France, the Prometheus Foundation, a group of the largest French private companies, including oil, health insurance and pharmaceutical firms, has issued an 'NGO Transparency Barometer'. The methodology, based only on available public data from NGOs' websites, has been openly criticised by Coordination Sud, the French NGO forum.⁶

To open up the debate on corruption and to promote preventive measures, Médecins du Monde (MDM) led a study in 2008 which aimed to interview the 17 largest French NGOs regarding their perceptions of corruption, their approaches to field work and appraising and managing risks, and the procedures they had in place to minimise and prevent such risks.⁷ Surprisingly, 11 of the

⁵ See <http://www.danchurchaid.org/about-us/quality-assurance/anti-corruption/cases>.

⁶ See <http://www.promethee.fr/main.php>.

⁷ MDM in partnership with Sciences-Po Paris, *Analyse de la corruption dans le secteur de l'aide humanitaire et perspectives*, 2008. The 17 NGOs approached account for more than 80% of French humanitarian aid.

Box 1: Problems in the tsunami response

After the Indian Ocean tsunami in 2004, Save the Children acknowledged problems in its reconstruction programme. The agency suspended construction during investigations, met with local communities and authorities, dismissed contractors and constituted a multi-disciplinary team to tackle the issue. It also established its own ombudsman committee, which by the end of 2007 had investigated 44 cases of corruption.⁸

17 NGOs contacted refused to participate in this (strictly confidential) study. Among NGOs that agreed to take part, most recognised that cases of corruption were part of the significant operational challenges around humanitarian aid. The study confirmed what TI had already demonstrated: that humanitarian operations are most vulnerable to corruption in the procurement, transport and distribution of medicines, food, building materials and other consumables, particularly in large, rapid-onset emergencies.⁹

It is also important to remember that most emergency situations occur in countries where corruption is already widespread. The great majority of agency staff questioned in the 2008 study believed that corruption was primarily contextual in origin. Over half had witnessed incidents of corruption, been offered bribes or asked to pay them or had been invited to participate in corrupt activities.

NGOs need to ensure that they are well-informed about the nature and level of corruption in the countries in which they operate. This can be done by using, among other sources, Organisation for Economic Cooperation and Development (OECD) and TI reports on corruption levels. Although NGOs are unlikely to be able to address the root causes of 'contextual' corruption at a country level, individually or directly, by working with other NGOs and civil society it may be possible to mitigate the impact on humanitarian operations and local governance. In Bangladesh, for instance, 66.7% of households experienced some form of corruption when trying to access public services. Forty-eight percent of those interviewed encountered corruption in the health service, primarily bribery and nepotism. The most obvious examples were doctors charging for prescriptions and referring patients to their private clinics, and patients having to pay extra fees for tests in government hospitals. Community action at field level resulted in the creation of Committees of Concerned Citizens (CCCs), which acted as watchdogs on local governance and attitudes in both the education and health sectors. This led to dramatic improvements in the quality of care, and significantly reduced bribery, nepotism and negligence.¹⁰

⁸ Michael Sheridan, 'Massive Fraud Hits Tsunami Aid', Times Online, <http://www.timesonline.co.uk/tol/news/world/article706115.ece>.

⁹ See *Preventing Corruption in Humanitarian Assistance*.

¹⁰ C. Knox, 'Dealing with Sectoral Corruption in Bangladesh: Developing Citizen Involvement', *Public Administration and Development*, 29, 2009.

Accountability initiatives

At the international level, TI has just finalised a practical guide to identifying the weak links in the humanitarian response system in order to improve awareness and as far as possible prevent corrupt practices.¹¹ The guide also devotes significant attention to how to monitor and evaluate anti-corruption measures. Several NGOs, notably from English-speaking countries, participated in the development of this document, which is more technical than political.

In 1997, the Ethics and Transparency Committee of Coordination Sud drafted a charter of good practice.¹² Most large French NGOs are members of the Comité de la Charte, an independent organisation whose aim is to promote financial transparency. NGOs belonging to the committee are required to have their activities (financial and operational) audited each year by a certified auditor. NGO programmes and accounts are also subject to various external audits (several per year) commissioned by donors including EUROPAID and ECHO, as well as by the Cour des Comptes (the government audit office). In addition, most French NGOs have established internal control mechanisms which enable information from the field to be verified and cross-checked.

Conclusion

One of the lessons of the MDM study, which has also been confirmed by TI, is that it is extremely important for field teams to have appropriate and clearly defined intervention strategies, good knowledge of the field context and training on how to identify and reduce the risks of corruption, particularly operational risk factors associated with the procurement, transport, storage and distribution of relief goods.

As a complex global phenomenon with significant local consequences, corruption is a critical aspect of humanitarian thinking and action. Good governance and transparency are at the heart of NGO legitimacy. NGOs must work with Transparency International, the OECD and other institutional partners and private donors in order to fight corruption effectively. Strengthening community involvement in the implementation and evaluation of humanitarian (and development) programmes improves the 'acceptance' of NGOs by the beneficiary population and helps to mitigate against corruption and promote better local governance. We need an open debate on the risks of corruption and how to address them, without undermining donor funding to and beneficiary confidence in NGOs. As well as strictly operational considerations, corruption constitutes an important ethical and political challenge for humanitarian NGOs.

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¹¹ TI, *Preventing Corruption in Humanitarian Operations*, 2010.

¹² See http://www.coordinationsud.org/wp-content/uploads/csud_charte.pdf.

Delivering communications in an emergency response: observations from Haiti

Imogen Wall, independent consultant

The response to the January 2010 earthquake in Haiti included unprecedented efforts to improve communications with affected communities. Distinct from public or external relations, this area of work promotes ways in which aid agencies can get better at both sharing information with and listening to those affected by disaster. Experience in past disaster responses has shown that communication with affected populations is a critical aspect of operational delivery, improving transparency and accountability, ensuring effective service delivery and achieving meaningful participation and the delivery of information as a form of assistance in its own right.¹

Despite this level of interest, evidence from Haiti suggests that the picture is at best uneven. As research by the Humanitarian Accountability Partnership (HAP) and others has identified, few agencies communicate meaningfully with affected communities, including sharing information and listening to those they are seeking to help.² This article focuses on those agencies that have made headway in this area, identifying the factors that enabled them to do so. The cases presented here are based on a series of interviews with local and international humanitarian actors, and where possible with the recipients of humanitarian aid. In addition to reviewing how agencies communicated with their beneficiaries, the research aimed to identify and capture best practice in areas such as mass communications, work with local media and the use of new technology.

The importance of appropriate resources

The central finding is that those agencies which resourced communications work appropriately, in particular those that established stand-alone units, provided better communications support across their organisations than those that did not. Most of these agencies also had stand-alone communications projects and addressed wider questions of access to information, rather than just focusing on information exchange between the agency and its beneficiaries. A second key finding is that the most successful communications models used multi-platform and systemic approaches, rather than relying on a single tool, such as community meetings, verbal briefings or bulletin boards.

That some agencies succeeded in developing effective camp-based communication systems indicates that this is possible even in a complex operating environment like Haiti. One such model was developed at Annex de la Marie,

a camp in Port au Prince managed by the International Federation of Red Cross and Red Crescent Societies (IFRC). Working specifically on the issue of shelter, IFRC was only able to provide transitional shelters for around 350 of the 800 families in the camp, and the communications strategy aimed to explain to residents who would qualify for shelter, how the process worked, how to complain if people felt they had been wrongly assessed and the alternative assistance available for people who did not qualify. The agency used notice boards, written information about the process, community meetings, a helpline run by a staffed call centre (outsourced to a private company), communication liaison staff, sound trucks and public announcements to launch the shelter initiative. The approach addressed the information needs of the affected community, met transparency and accountability requirements and helped to mitigate conflict and build trust through dialogue. Communications work is now focused on gauging people's satisfaction with their shelter, recording and addressing outstanding issues and continuing to help those who did not receive a shelter to obtain rental support or take up other shelter alternatives.

As a result of these efforts, camp residents – who had initially accused IFRC of attempting to deprive them of shelter and threatened to obstruct construction – became supportive of the shelter initiative. During a visit by Infoaid, residents expressed their satisfaction with the level of information they had received and their engagement with IFRC. They were particularly appreciative of the helpline; even people who had never used it felt reassured that it was available. IFRC staff working at the site also commented that the communications support had helped to improve relations with the community, build trust, mitigate against conflict and create an environment in which project implementation (construction) was possible. IFRC call centre data suggests that the communication process and the opportunities for communication – not just the information – were very important to camp residents. Satisfaction levels with the call centre (ranging from 85% in one survey to 100% in another) were higher than with IFRC itself. An independent evaluation of the IFRC beneficiary communications programme found that 85% of those surveyed were happy with the service. IFRC staff interviewed also felt that the support provided by the communications unit had been valuable, and had helped create a conducive environment for the project.

IFRC was able to pilot this comprehensive approach partly because it was one of the few organisations to establish a dedicated 'beneficiary communications' unit at the beginning of the response. Led by a communications specialist, the unit had a separate budget and terms of reference and was supported by a local team. The unit provided technical advice, funding and additional capacity to the Annex de la Marie initiative.

¹ See HAP Benchmarks 3 and 5 (Sharing Information and Handling Complaints); IFRC, *World Disasters Report 2005: Information in Disasters*; Imogen Wall, *The Right To Know: The Challenge of Public Information and Accountability in Aceh and Sri Lanka*, Office of the UN Secretary-General's Special Envoy for Tsunami Recovery, 2006; and HAP, *The 2010 Humanitarian Accountability Report*.

² See HAP, *The 2010 Humanitarian Accountability Report*, especially Chapter 3, 'Voices of Disaster Survivors – Haiti 2010'.



Inogen Wall

Community mobilisers in Leogane, Haiti

In terms of operationalising good communications, the experience of IFRC and other agencies that used the same operational structure stands in contrast to those organisations that tried to implement communications work without adequate technical expertise or support. This includes organisations whose main communications objective was to improve transparency and accountability.³ Several organisations in Haiti made laudable efforts to introduce transparency and accountability at a very early stage, hiring dedicated staff and placing this work at the heart of their operational response. However, giving responsibility for communications work to overworked staff who were not technical specialists limited the effectiveness of these programmes.

One organisation established a camp-based humanitarian accountability system within five weeks of the disaster, which included camp liaison staff and plans for bulletin boards and complaints boxes. Its approach was impressive in many ways. To ensure that the Haiti team developed and built on the agency's work in other contexts, a staff member with relevant experience who had managed accountability elsewhere was recruited, and support was provided by HAP. The team, initially known as Camp Liaison and initially led by a Haitian staff member who was a trained psychologist, started work in mid-February. It was specifically tasked with talking to camp residents, implementing feedback and complaints systems and advocating within the agency on the residents' behalf.

Assessing the impact of this work in Haiti is difficult as – in common with almost all such projects in Haiti – no detailed monitoring and evaluation has been carried out; beneficiaries' perspectives are particularly hard to research given the time that has elapsed since the earthquake.

³ HAP Benchmarks 3 and 5 both require organisations to systematically provide information about their work to survivors, and put in place ways for disaster survivors to register complaints and other feedback with those assisting them.

Asked to reflect on their experiences, staff said that a more systematic and better resourced focus on communications would have enhanced their work further. In particular, they noted that, despite recognising the importance of communication, the agency did not identify a need for specialist technical communications support to help develop effective communications strategies until several months after the earthquake. Local staff in particular saw this as an important gap. As one staff member put it: 'communication is the most important thing. Without communication you can't organise anything. Next time, I would organise better communication first. I would provide training for my team, especially on how to handle discussions and manage conflict and anger. Guidelines would also be useful: Sphere needs to talk about communication'.

The importance of technical support in communications was also recognised in an internal evaluation of the agency's humanitarian accountability work. This recommended a number of technical improvements in communication, including the development and production of written materials to accompany verbal briefings and briefing notes for staff interacting with camp residents. It also emphasised the need for information to be repeated and reiterated to guard against distortion. The evaluation also found that few residents understood the agency's concept of 'feedback', and recommended more systematic and effective communication around what does and does not constitute a 'complaint'.⁴

Staff also noted that, in practice, the perceived focus of transparency and accountability on feedback and complaints management had also led to a strong emphasis on collecting information from disaster survivors, rather than on proactive information sharing with affected communities (for example about the organisation, its

⁴ 'Humanitarian Accountability Assessment, October–November 2010', WVI internal assessment.

plans and what it is able and not able to do). This was also felt to be an imbalance by staff. As one international staff member commented: ‘If we had proactively shared information more, we wouldn’t have got a lot of the feedback that we did. A lot of the feedback was basic questions about who we were and what we were doing. If we had told them about areas of focus and selection criteria, for example, we would have pre-empted a lot of that. We quickly realised this was a gap’.

Organisations that established communications with beneficiaries as an area of work in its own right were also concerned with improving access to information for all Haitians. IFRC and Voila, one of the main providers of mobile phone services in Haiti, developed an SMS system which enabled information to be shared rapidly with large numbers of people. Initially this system was used to alert people to new services like vaccination clinics. The model was then developed along with an IVR (Interactive Voice Response) phone system to enable transmission of hurricane warnings and preparedness information to specific geographical areas. During the October 2010 cholera outbreak, the system was quickly adapted to provide information about prevention, identification and treatment, as well as the locations of cholera treatment centres.⁵ The IFRC communications unit also established a regular, live, nationwide radio show in partnership with local station Radio 1. As the show was live, listeners could call in and ask questions directly of project staff. This project became particularly important during the cholera crisis when, in response to audience demand, several programme broadcasts were dedicated to cholera. The International Organisation for Migration (IOM) and the UN Office for Project Services (UNOPS) also developed projects that addressed more general information and communication needs.

Standalone communications units

A second finding is that having standalone communications units or activities which can provide technical support across an organisation, as IFRC and some other agencies did, helped increase operational effectiveness. Staff in these organisations emphasised how important such support was to improving project implementation and delivery. Some staff, even those who were previously sceptical, said that they now believed that dedicated communications support was essential to effective project delivery. ‘I would say registration [of camp residents post-earthquake] would have been almost impossible without the support of our communications team’, one senior camp manager noted.⁶ Representatives of WFP said that hiring a local spokesperson to explain food distribution processes was key to improving the management of distributions in the first few weeks after the earthquake.

⁵ Although infoasaid focus groups found anecdotal evidence that responses to this service were positive and IFRC’s efforts were appreciated, no detailed evaluation of this work has yet been carried out by IFRC, so the beneficiary perspective has not been captured or analysed in any meaningful way.

⁶ This process was supported by IOM’s communication unit, which established teams of dedicated local communications staff who went to camps and helped explain the registration process, produced leaflets and fliers and used sound trucks and entertainment to provide information and assist in crowd management.

The importance of dialogue

A third key observation is that the most successful communications strategies in Haiti used multiple channels and emphasised dialogue and open-ended communication, rather than just information collection or delivery. Many survivors commented on how important the communications process was to them – knowing that there were ways to express their views (not just complain) and to ask questions was key. Haitians interviewed were acutely aware of which organisations had bothered to communicate with them, and had much more respect and enthusiasm for those that did.

Conclusion

There are some important caveats to drawing clear conclusions from communications work in Haiti. One is that the Haiti earthquake occurred in a very particular context, where social, political, economic and cultural dynamics varied widely between those affected. Another is the lack of systematic monitoring and evaluation of communications work, in particular how disaster survivors perceive and use agencies’ communications channels in the early stage of a response. Even agencies that established dedicated communications teams tended to focus on information distribution, with few mechanisms for either gauging community response or establishing systematic ways of listening to affected communities. IFRC, for example, tends to cite the numbers of SMSs sent as an indicator of the success of the project, even though data like this offers little insight into actual impact.

The Haiti experience confirms that effective communications can enhance all aspects of humanitarian work, including transparency and accountability, public education and information and service delivery. The best way to achieve this is to establish a well-resourced, dedicated communications capacity, including technical specialists, to ensure that communications work is well designed and implemented, and to train and support operational staff across the organisation. Key to this is the recognition that effective communication with communities is a specific and important technical area of work, separate from PR or external relations. In Haiti, this tended to involve recruitment of international communications experts, but in other contexts there may be opportunities to source such expertise locally. Because communications is a social and cultural process international expertise alone is unlikely to be sufficient.

Haiti reinforces findings from earlier emergencies: effective communications work requires technical expertise. Unless organisations commit to investing in effective communications, recognising this as distinct from external relations and working with donors to ensure both funding and methods of measuring operational impact, the potential of communications work to improve all aspects of humanitarian response – including accountability and transparency – will not be realised.

Imogen Wall is an independent communications consultant specialising in disaster response and humanitarian emergencies. The research in Haiti discussed in this article was conducted for the infoasaid project, a partnership between Internews and the BBC World Service Trust, funded by DFID. The project seeks to improve how aid agencies communicate with disaster-affected communities.

Local perspectives of the Haiti earthquake response

Gregory Glead, HAP International

This article is based on the 'Voices of Disaster Survivors' chapter in the 2010 *Humanitarian Accountability Report*, published by the Humanitarian Accountability Partnership International.¹ This section of the report looks at the perceptions of disaster-affected communities in relation to the quality and accountability of aid in their communities in the wake of the Haiti earthquake in 2010. Several common themes are identified, including the difficulties that agencies face in sharing information with intended beneficiaries, engaging with them at different stages of the project cycle and dealing with the concerns and complaints of people affected by the earthquake.



UN Photo/Sophia Paris

Earthquake victims queue for water in Port au Prince

Research methods

A total of 19 focus group discussions (FGDs) and two semi-structured interviews were conducted over a period of seven days from 16 September 2010. These were held in ten different locations: six internally displaced (IDP) camps in Port au Prince, three communities in the hills around Port au Prince and one community in the hills around Leogane. The two semi-structured interviews were conducted in an IDP camp in the Port au Prince area. All of the communities visited had received humanitarian aid following the earthquake. Of the 261 participants, 137 were male and 124 female.

Four local people from disaster-affected communities were recruited to facilitate the FGDs. The local facilitators were briefed on the research topic and questions (16 in total), and how to facilitate group discussions. While some contextual questions were asked at the beginning of the discussions about the type of aid received and how long respondents had been living in the area, the majority of the questions were designed to generate information on the quality and accountability of programming as perceived by respondents. At the end of each focus group a participant was asked to summarise the main points and there was an opportunity for further questions and comments.

Main findings

The most pervasive problems identified during the research related to information sharing, participation and complaints handling. Overall, agencies that employed an integrated approach to communicating and engaging with disaster-affected communities were viewed more positively by beneficiaries than those that did not.

¹ The report is available at <http://www.hapinternational.org/projects/publications.aspx>.

Managed versus unmanaged camps

During the course of the FGDs two types of camps were visited: managed and unmanaged. In managed camps an aid agency was recognised as facilitating overall activities in the camp. The lead aid agency established itself within the camp, had a sustained and visible presence (logos on clothing, tents and vehicles), and delivered the majority of the aid for that camp. Unmanaged camps had no long-term 'resident' NGOs and received aid sporadically from a variety of different organisations. Respondents from managed camps said that they got information about assistance at meetings organised by aid agencies. Unlike in unmanaged camps, they were also able to identify and distinguish between different aid agencies and the assistance they delivered.

Participation and representation

In the majority of locations, a committee had taken on the role of representing the community and interacting with aid agencies. FGD participants noted that these committees were not representative, but usually comprised middle-aged men in positions of authority who had formed the committee on their own initiative. In many cases these committees were the primary point of contact between the affected population and aid agencies, and agencies often delegated responsibility for managing the delivery of aid to them, including beneficiary selection and information dissemination. In some cases aid organisations found it difficult to ensure that aid was being distributed on an impartial basis because of poor governance or corruption within the committees. In some locations, FGD participants said that agencies had held consultations with the wider community, not just the camp committee. In these locations, the community felt involved in the work agencies were doing and were positive about them.

Several representatives of camp committees complained about inadequate responses to their demands from aid agencies, and the low priority that agencies gave to communicating and collaborating with them: 'When there are meetings between the committee and agency staff members our demands are never accepted. It is the agency that proposes and at times imposes projects'. Camp committee representatives felt that aid agencies did not have an adequate understanding of the situation on the ground, and believed that committee participation could play an important role in facilitating this.

In several cases camp committees struggled to cope with the responsibility given to them. One committee member spoke about the difficulty of having to select only 25 individuals out of 500 for a cash for work programme: 'I have been verbally threatened because an agency does not provide a sufficient number of cards for everyone surveyed'. Committee members also complained about being physically abused. 'One day a member of a community who had a problem with a cash for work programme came into our tent and threw the desk on top of me.'

Information-sharing

People were generally happier with the aid they were receiving when agencies implemented coordinated information dissemination strategies. Beneficiaries were more frustrated and confused in locations where the implementing agency only gave out information through a committee or local representatives.

A lack of information about beneficiary selection fostered a range of opinions about why certain areas received certain forms and levels of aid. The numerous IDP camps around Port au Prince allowed affected people to observe the aid agencies across several locations. Consequently, in many locations people compared their situation with those in nearby camps. FGD participants in one camp believed that more aid was being delivered to a neighbouring camp because residents there were more aggressive in demanding it. Those who received less consequently felt neglected and believed that agencies were not impartial in their delivery of aid. 'I think we are too peaceful. Maybe that is why NGOs are neglecting us. From what we can observe, aid is distributed more often in camps where people are more aggressive.'

In another location there were violent confrontations between neighbouring communities. 'To get water we have to go down to the road to where the agency has placed three water tanks in the neighbouring camp. On our side the agency placed two tanks. But there was a problem and we never received any water. No one has told us why. As a result, we have to struggle to get water. Sometimes stones are thrown and there are fights. Why should we see blood run for a bit of water?' The FGD facilitators raised the issue with the agency. Staff explained that the water tanks had been sited in such a way that water-delivery trucks could not access them easily. As a result, the tanks had not been filled. The agency's failure to communicate information on water access arrangements clearly to both camps was the root cause of the confusion and resultant violence.

Quality and appropriateness of aid

Many respondents said that aid was inappropriate. In one FGD participants noted that the cash for work programme in their camp was a forest replanting scheme, yet at the same time they were given charcoal burners that required them to cut down more trees.

Beneficiaries with mobility problems and other disabilities said that none of the aid interventions considered their specific needs and circumstances. In many cases these people were dependent on their neighbours or acquaintances to secure basic necessities. Adolescent males also maintained that there were no specific programmes tailored to their needs, and noted that the majority of interventions were focused on children, adolescent girls and women. As a result, young people felt ignored and neglected.

In one camp FGD participants said that they had expressed concerns about the siting of toilets. However, the aid agency proceeded with their original plan anyway without explaining to residents why this decision had been made. The toilets then overflowed following heavy rain, forcing camp residents to use plastic bags that were then discarded around the camp. While there may have been a legitimate reason why the aid agency decided to place the toilets where they did, the lack of response to community concerns made people feel that they had been ignored.

Agencies were not able to respond adequately to the needs of communities because they did not involve them in the programme cycle and did not establish effective communication and feedback systems. 'I appreciate the work of the organisation but would like it if staff members would be present to take into account our difficulties and worries, it is important for them to know our needs.' Aid delivered by agencies that did not consult with communities or respond to their concerns was viewed as of little value by beneficiaries.

Complaints handling

According to FGD participants the most effective way to lodge a complaint was through a toll-free telephone number. In some communities people said that they had registered complaints in this way, which were then addressed by the agency concerned on the next visit to the project site. FGD participants from communities with this system had a better understanding of the constraints the agency was operating under.

In the other camps and communities visited, numerous FGD participants said that they had wanted to lodge complaints, but did not feel that they could because handling complaints was a committee responsibility, there was poor staff representation or there were no appropriate mechanisms in place.²

In four out of the ten locations visited aid agencies had set up complaints boxes. However, not a single participant in

² Complaints dealing with sexual abuse and exploitation were not discussed in the focus groups.

the FGDs and semi-structured interviews had attempted to use them, partly because people had not been told the purpose of the boxes. One participant noted that ‘the aid agency has not told us anything, I don’t know if it’s to give them money’. As the boxes were not locked, confidentiality was not guaranteed. One woman commented: ‘We were told to write a letter when we had a problem and drop it in the box. But the problem is that the letters are not secure, the boxes are not locked’.

Only once during the FGDs did beneficiaries mention that complaints could be lodged directly with an aid agency representative on site, and even when this was possible people rarely received a satisfactory response. On two occasions participants spoke of lodging complaints and securing redress by presenting themselves at the head office of the implementing agency.

Conclusion

The level of information sharing in all camps was minimal. Respondents noted that they rarely if ever participated in meetings with aid agencies. This led to frustration and confusion and had a negative effect on relations between agencies and communities. Where notice boards were used to communicate information about aid agency activities, and where community consultations were not limited to camp committees, focus group participants expressed positive views of those agencies. Overall, involving communities in

decisions that directly affected them was rare in the larger camps, making people feel that aid agencies were not taking them seriously. In some cases this led communities to stop attending meetings.

Camp committees were criticised for failing to follow up on complaints, being biased and corrupt (mentioned in all but one of the IDP camps visited) and having limited capacity to carry out their duties. Where camp committees played a significant role in the delivery of aid agencies engaged in limited community consultation, information did not reach the most vulnerable people and there were no effective channels through which complaints could be lodged.

Although the situation in each location varied considerably in terms of the size of the camp and the geographical location, the local facilitators were consistently told that certain aid agencies were better at communicating than others. Effective engagement included coordinated information dissemination by aid agencies, opportunities for people to participate in the decision-making processes leading to immediate results and the ability to raise concerns and complaints. An integrated approach to improving accountability resulted in positive perceptions of aid agencies and in the delivery of aid that was valued by communities.

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NGO accountability: findings from South Sudan

Karyn Beattie, independent consultant

NGO accountability has been a popular topic over the last decade. For academics and implementers alike the debates are interesting and thought-provoking, but for implementers there is still a lack of clarity on how to put it all into practice. This article, based on research conducted over 18 months in South Sudan, focuses on NGO accountability to the people humanitarians aim to assist. The research looks at the gap between theory and practice and draws on learning from the literature.

NGO accountability

Calls for greater accountability have forced NGOs, just like businesses and government agencies worldwide, to broaden their accountability to consider all stakeholders. But unlike in business or government, it is difficult for NGOs to identify a primary stakeholder.

In 2003, the Humanitarian Accountability Partnership (HAP) was established with the aim of promoting higher standards of accountability and better management systems among NGOs – particularly those providing humanitarian assistance.¹ The HAP standards of accountability require that NGOs prioritise recipients of aid as stakeholders. However, although this group is most affected by the decisions and actions of NGOs, in

¹ See <http://www.hapinternational.org>.

practice they are often trumped by other stakeholders. For example, during the period of research in South Sudan, the Ministry of Health decided to prioritise a specific age-group of children for immunisation. While adhering to this directive, NGO staff received complaints from mothers and carers who had walked long distances only to be told that their child was not eligible for vaccination. In this case, government legislation took priority over the wishes of the community. It is the tension and complexity of stakeholder priorities that we need to consider when we talk about NGO accountability. But we also need to understand what accountability means to different groups.

What is ‘accountability’?

Across the literature there is acknowledgement of the complexity of the English word ‘accountability’. It is a particularly elusive word because its meaning changes dramatically depending on the context, and it is not easily translated into other languages. This is particularly important for emergency relief NGOs, whose staff and aid recipients are culturally and linguistically diverse. It is all very well agreeing that we need to be more accountable, but what constitutes accountability for an elderly woman living in rural South Sudan, or a young Japanese man who has recently survived a tsunami? Perhaps more importantly, what is the likelihood of NGO staff from vastly different



A noticeboard for beneficiaries in South Sudan

Kany Beatrice

backgrounds reaching a common understanding of how to be accountable to the communities they are serving?

In the research, 23 field staff of three different nationalities were interviewed at two different sites. Of these, 18 had received some form of training or induction in the HAP standards. Depending on when staff joined, their interview included questions on accountability. In one site, training was followed up by the appointment of a full-time accountability officer; in the other, follow-up was through further training events. While the more senior staff were able to articulate the concept of accountability in some depth, junior staff tended to understand just one or two aspects of the word. The lack of clarity around the concept resulted in junior staff having a disproportionately negative view of the accountability mechanisms established.

Policing mechanism

The most common problem was that accountability mechanisms, such as complaints boxes, sharing detailed project plans in community meetings or appointing an accountability officer, were viewed as policing mechanisms by the staff. ‘Okay, so now you are going to be the policeman!’ was one comment made to an accountability officer following a training session to introduce the concept. This may be understandable since the concept was new to staff, but other officers reported similar reactions from their peers even after training.

One accountability officer, referring to the challenges she faced in implementing accountability mechanisms, said:

‘The problem is not with the beneficiaries but with the staff’. Her manager confirmed this: staff ‘just assumed that they [accountability officers] are working a sort of security thing for the organisation ... So that was really demotivating’. This was despite both the manager and the accountability officer providing ongoing training. The accountability officer was one of the most articulate of those interviewed so the failure did not stem from the calibre or content of training. The reality is that staff can interpret the imposition of accountability measures as implying a lack of trust in them no matter how much training and support they receive.

This problem was compounded by the fact that field staff were less familiar with the mechanisms implemented to ensure accountability to other stakeholders, such as reporting to the host government, the giving public or the charity commission. They felt singled out. One field officer recounted his belief that the Juba office was not familiar with accountability mechanisms since they were only implemented at the field level.

These challenges are not easy to address. Being accountable is a way of thinking, not a project that can simply be implemented or rolled out. As one officer explained: ‘It’s trying to communicate much more than the standards, it’s about the essence of what is behind it’.

Time constraints

Another difficulty is the time pressure involved in humanitarian work. As one senior manager put it, ‘it was just another thing ... our programme was struggling to actually run a health care clinic much less sit down with the community and be accountable to them’. This concern was expressed by a number of interviewees, and was echoed in the findings of The Listening Project, a collaborative venture to record the views of nearly 6,000 local people on what can be done to make international aid efforts more effective and accountable.² Reporting deadlines and pressure to spend contrast with the lengthy process of getting to know a community sufficiently to develop trust. As one nurse put it: ‘it is very tempting to just ... start giving out your services ... you want to catch up with time’.

When faced with time constraints, one option is to say, ‘Just tell me what I have to do’. One response to this question is to develop guidelines which try to translate a complex concept into a simple set of tasks. In this case, guidelines were developed at the NGO’s head office and then presented to senior field staff for implementation in their project sites. However, producing guidelines may be counterproductive. For example, in the research areas the Country Director had insisted on notice boards being put up in the communities because this was suggested in the guidelines and had worked well in projects in Kenya. But because illiteracy rates were very high, the information on the notice boards was largely useless to the community. When asked how they received information from the NGO, all the interviewees cited public meetings. They only acknowledged the notice boards if asked directly and

² See <http://www.cdainc.com>.

then admitted that very few could read them. Given these difficulties, it is hardly surprising that some staff found it difficult to accurately describe how to be accountable to the community.

Community perceptions

The challenges facing NGO staff are one thing, but do the measures taken by NGOs constitute accountability as far as the members of the community are concerned? The research included discussions with groups and individuals from the Dinka Malual tribe in the two project areas, but was not restricted to recipients of the assistance. Because of the complexity involved in translating 'accountability', the main themes that were explored included the information received, the mechanisms for feedback, the relationship between the NGO and the community and perceptions of the aid and services provided.

Without exception, participants said that they were happy with the interaction between themselves and the NGO. 'Up to now, our relationship with [the NGO] is okay', said a group of elders. Similarly, most interviewees said that they felt free to raise issues at any time. According to one man, '[The NGO] respects us just as we respect them'. However, a number of incidents during the period of the research appeared to contradict these statements. For example, when local traders disagreed with the NGO's decision to award a tender to local farmers instead of them, they 'arrested' two local staff members and threatened the NGO. This was despite being given the opportunity to discuss the decision at a meeting held for that purpose. It took over a week to resolve the problem; during that time, the chief made the following statement in one of the research interviews: '[The NGO] are like friends to us – they come and help us in our homes just like a friend does. Therefore I cannot allow you to be mistreated'. This statement seems to demonstrate that, while NGO staff felt mistreated by the traders, the community had a different perspective. For them, this was a way of indirectly communicating.

Other similar incidents indicated that the community was reluctant to express issues directly. One local staff member explained that this was because they did not want to cause problems between the community and the NGO. This is understandable. Until the late 1990s, NGOs provided virtually the only economy in South Sudan, and they still wield significant economic power today. As one interviewee said, 'they're not going to upset the donor because [the NGO is] the donor and if they say the wrong thing to [the NGO], maybe money won't come'. In this particular case, it is difficult to see how accountability could work. Certainly, if people feel reluctant to raise an issue directly with an NGO, they are unlikely to view information

sharing and feedback (or complaints) mechanisms as a form of accountability.

Personal relationships are fundamental in South Sudan's Dinka culture. As one local staff member said, people relate to and respect individuals, not organisations. Staff turnover, which remains high, can adversely affect engagement in such cases. This was reflected in the community's reaction when a new manager was appointed in one of the research sites. The former manager had been in position for three years and had developed a good rapport with the community. When the new manager came in, people felt uncomfortable with the change. Even though only one staff member had changed, they said that the NGO had 'gone across the river and left them behind', a euphemism for division or a lack of harmony.

Quality of the services provided

Community members were asked whether services had improved after accountability mechanisms had been implemented. Respondents consistently cited an increase in the number of services as an improvement. While in the literature accountability is often linked to quality, what constitutes quality is subjective. For the beneficiaries interviewed, quality was equated with an increase in the quantity of inputs and services; for humanitarian actors, quality is usually about achieving technical excellence and adhering to standards, codes and principles.

The findings of the research did not show a clear link between the implementation of accountability mechanisms and the quality of the services delivered. While the accountability mechanisms provided the community with information, and avenues for feedback and complaints ensured that responses were given, the community did not link these to improvements in services.

Conclusion

The growing acceptance of the HAP standards indicates the willingness of NGOs to do better. It is natural that the profile of accountability should have been raised since it is linked with improvements in performance. But accountability is complex, and that complexity has not been given sufficient consideration. As a result, in some contexts what is called accountability to recipients of assistance is really not that at all. The volume of literature from other sectors is considerable, yet many NGOs continue to do things like put up notice boards in illiterate communities. Is that because we are too busy to learn from others, or because the mechanisms of accountability are really for us, our supporters and our donors, and not for communities after all?

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Applying conflict sensitivity in emergency response: current practice and ways forward

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How can emergency response be delivered in a more conflict-sensitive manner? To what extent should this be a priority for the sector? What practical tools and approaches have aid agencies used to better understand their contexts of intervention and minimize conflict risks?

As these issues become increasingly prominent in regions of the world as diverse as the Horn of Africa, Afghanistan and Libya, *Applying Conflict Sensitivity in Emergency Response: Current Practice and Ways Forward* offers insights into these pressing questions. Drawing on field research from Haiti, Pakistan and Sri Lanka, interviews with over 50 humanitarian professionals and a document review of aid agencies and sector-wide guidance and standards, this paper maps the current state of conflict-sensitive practice in emergencies. It identifies good practice and key gaps and points out practical ways to integrate conflict sensitivity more strategically across the emergency programme cycle.

One of the key conclusions from the study is that there are clear opportunities for synergy between conflict sensitivity and the emergency capacity-building initiatives under way within many agencies. Significant improvements can be achieved through relatively simple steps which complement existing tools, standards and efforts to improve programme quality. The paper suggests six minimum standards for conflict-sensitive emergency response which, if applied, would not only help minimise harm and reduce conflict risks but also increase the overall effectiveness of humanitarian response.

This paper, published by the Humanitarian Practice Network, is based on research commissioned by CARE International UK and CAFOD on behalf of the Conflict Sensitivity Consortium, with the participation of World Vision International, Peace and Community Action, Catholic Relief Services, ActionAid International and Plan International.

Humanitarian Practice Network

The Humanitarian Practice Network (HPN) is an independent forum where field workers, managers and policymakers in the humanitarian sector share information, analysis and experience.

HPN's aim is to improve the performance of humanitarian action by contributing to individual and institutional learning.

HPN's activities include:

- A series of specialist publications: *Humanitarian Exchange* magazine, Network Papers and Good Practice Reviews.
- A resource website at www.odihpn.org.
- Occasional seminars and workshops bringing together practitioners, policymakers and analysts.

HPN's members and audience comprise individuals and organisations engaged in humanitarian action. They are in 80 countries worldwide, working in northern and southern NGOs, the UN and other multilateral agencies, governments and donors, academic institutions and consultancies. HPN's publications are written by a similarly wide range of contributors.

HPN's institutional location is the Humanitarian Policy Group (HPG) at the Overseas Development Institute (ODI), an independent think tank on humanitarian and development policy. HPN's publications are researched and written by a wide range of individuals and organisations, and are published by HPN in order to encourage and facilitate knowledge-sharing within the sector. The views and opinions expressed in HPN's publications do not necessarily state or reflect those of the Humanitarian Policy Group or the Overseas Development Institute.

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