

Chapter 1

An Overview of Humanitarian Accountability in 2008

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1.1. Introduction

The purpose of this Chapter is to provide an overview of the principal developments and apparent trends during 2008 in relation to accountability within the humanitarian system. The chapter is based on a desk review of publications, document sources and information on relevant developments during 2008 supplemented by a dozen interviews. Advice on potential sources was sought from HAP staff and key informants and was complemented by web searches and reviews of agency websites. The review sought to be as comprehensive as possible but inevitably it may have missed certain developments or documents.³

Evaluation continues to play an important accountability and learning role within the humanitarian system and a total of 22 evaluations that had been placed on the Evaluative Reports Database of the Active Learning Network for Accountability and Performance (ALNAP) during 2008 were included in the document review. They were reviewed with regard to the extent to which they had sought the views of beneficiaries and affected populations on the assistance provided and the extent to which issues of accountability had featured in the evaluation. Where this was the case, the reports afforded an insight into accountability practices in actual operations.

Material gathered was summarised and then organised either by type of organisation (i.e. NGO, UN and donor) or cross-organisational or system-

2 This chapter was written by John Borton, an independent consultant and researcher focussing on humanitarian emergencies and the operations of the humanitarian system, and the lead author of the seminal 1996 evaluation report; *The International Response to Conflict and Genocide, Humanitarian Aid and Effects*. The chapter does not purport to represent the views of the HAP Secretariat or the HAP membership.

3 Readers are encouraged to draw such publications to the attention of HAP staff so that monitoring of key publications on accountability may be improved.

wide relevance. Key developments and the trends apparent from this initial base document were then used in selecting the principal headings used in this chapter.

The chapter is structured as follows:

Section 1.2 provides a reminder of the principal humanitarian operations that took place or continued throughout 2008, together with some available facts about the caseload and scale of expenditures.

Section 1.3 summarises the additional evidence that emerged during the year of the need for improved accountability together with the material that strengthens the 'business case' for organisations to invest in and adjust their systems to be more accountable.

Section 1.4 describes the principal developments during the year either on, or of significance for, accountability within the humanitarian system. The section considers developments within the NGO, UN and donor communities as well as across them.

However promising a policy announcement may sound or however great the potential of a newly launched initiative, the real test of progress is what has changed on the ground. Using the material available, **Section 1.5** offers some (admittedly basic) comparisons on accountability at the operational level between the two cyclone response operations in Bangladesh (from mid-November 2007 onwards) and in Myanmar (from the beginning of May 2008 onwards).

Section 1.6 considers a number of themes and challenges that struck the reviewer as significant. The themes considered include:

- The challenge of accountability in operations with significant organisational interdependence;
- The benefits and opportunity costs of multiple approaches to accountability;
- The potential implications of country-level NGO accreditation and certification schemes;
- The need for more research;
- The need for an agreed framework for assessing 'progress' in relation to accountability and quality in the humanitarian system.

Section 1.7 draws some overall conclusions from the review.

1.2 The Year in Question

2008 began with spreading communal violence in Kenya following the disputed elections of 27 December 2007 and ended with the ongoing Israeli military assault on Gaza that began on 27 December 2008. In between, there were substantial operations in Georgia/South Ossetia, Eastern DRC, Chad, Central African Republic, Sri Lanka, Iraq and Afghanistan.

As well as humanitarian needs created by conflict, 2008 also witnessed massive needs created by natural disasters in Myanmar, China, Haiti and elsewhere. According to a major reinsurance company, natural disasters killed approximately 225,000 people making 2008 the deadliest year since 2004, the year of the Indian Ocean tsunami (Munich Re, 2009). Economic losses resulting from natural disasters were also high – 2008 was the third most expensive year on record, exceeded only by 2005 (the year Hurricane Katrina devastated New Orleans and surrounding areas of the USA) and 1995 when an earthquake devastated the Japanese city of Kobe (Munich Re, 2009).

Overall statistics on the numbers of people receiving assistance through the international humanitarian system are not readily available. However, statistics are available for internally displaced people (IDPs) and refugees (people displaced across international borders). For the former, the Internal Displacement Monitoring Centre estimated the total number of conflict-related IDPs at the end of 2007 as being 26 million, of which an estimated 11.3 million in 13 countries were without any significant humanitarian assistance from their governments. Columbia, Iraq and Sudan together accounted for nearly 50% of the world's IDPs (IDMC, 2008). At the end of 2007, UNHCR's statistical yearbook indicated a total of 11.4 million refugees of which 82% were hosted by developing countries (UNHCR, 2008a).

Box 1. Main new and ongoing emergencies and humanitarian operations during the year

Bangladesh: continuing response to Cyclone Sidr (15 November 2007); 4,400 killed/missing, 55,000 injured, 10 million affected.

Kenya: widespread violence and displacement following disputed election of 27 December 2007; 1,200 killed and approximately 350,000 displaced into temporary camps, with an equal number seeking refuge with friends or relatives.

Myanmar: Cyclone Nargis (2-3 May 2008); 135,000 killed/missing and 2.4 million affected.

China: Sichuan Earthquake (12 May 2008); 88,000 killed/missing, 375,000 injured, 5 million homeless (est.), 15 million displaced (est.) (USG Factsheet).

Georgia/South Ossetia: conflict (August); 350 civilians killed and 192,000 displaced (Amnesty International).

Haiti: Hurricanes Gustav and Ike and tropical storms Hanna and Fay (August and September); 1,100 dead/missing, 826,000 affected (USG Factsheet).

Eastern DRC: conflict induced displacement from August 2008 (DEC Appeal November); 200,000 newly displaced in addition to existing 1.2 million IDPs.

Zimbabwe: ongoing political and economic crisis (disputed elections in March 2008); rampant inflation, general food shortages and nationwide cholera outbreak that began in August; 880,000 displaced.

Somalia: ongoing conflict and insecurity; 1.1 million displaced, 3.2 million in need of humanitarian assistance.

Darfur: ongoing conflict and insecurity; 4.7 m affected, 2.7 million IDPs, estimated excess mortality of 300,000 since 2004.

Chad: ongoing refugee programmes and insecurity; 300,000 refugees, 190,000 IDPs.

Central African Republic: conflict/insecurity in north (links to conflicts in Sudan and Chad); 200,000 IDPs and another 100,000 as refugees in Chad and Cameroon.

Gaza/Occupied Palestinian Territories: Israeli offensive against Hamas (began 27 December); 600 civilians killed (est.).

Sri Lanka: resumption of Government of Sri Lanka/LTTE conflict after GoSL withdrew from ceasefire; 280,000 displaced. Lack of access makes estimates of numbers killed difficult to verify but thought to be in the hundreds.

Iraq: ongoing conflict/insecurity; approximately 9,000 civilians killed (Iraq Body Count), 2.8 million IDPs (IDMC), 2.25 million refugees outside the country (UNHCR).

Afghanistan: ongoing conflict/insecurity; 2,118 civilians killed in 2008 (UNAMA), over 200,000 IDPs (IDMC) and 1.9 million refugees outside the country (UNHCR).

Uganda: earlier conflict/insecurity in the north; 1.2 million still displaced by mid-2008 (IDMC).

Source: Estimates of the mortality and damage are drawn from a variety of sources, including US Government Factsheets, UN agencies and missions, Amnesty International and the International Displacement Monitoring Centre.

1.3 Further evidence of the need and justification for improved accountability

Since 2002, when a report by Save the Children first made visible the issue of child sexual exploitation and abuse by aid workers, and the subsequent *UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse* of October 2003, considerable efforts have been made within the humanitarian system to address the issue. Codes of conduct, better interagency cooperation, new mechanisms to encourage the reporting of abuse and a proactive response, and the preparation of training, information and guidance material have all been developed and implemented. However, May and June 2008 saw the publication of separate studies by Save the Children UK and by HAP, both of which not only found evidence of continuing child sexual exploitation and abuse by aid workers but also highlighted a deep-seated reluctance by those affected, their parents and carers and also other aid workers to complain about sexual exploitation and abuse by aid workers.

In *To complain or not to complain: still the question*, Kirsti Lattu and colleagues reported on HAP consultations with a total of 295 aid beneficiaries in Kenya, Namibia and Thailand on their perceptions of efforts to prevent and respond to sexual exploitation and abuse (Lattu. et al., 2008). *No One to Turn To: The under-reporting of child sexual exploitation and abuse by aid workers and peacekeepers* by Corinne Csáky took a wider remit including exploitation and abuse by peacekeepers as well as aid workers. The study undertook 38 focus group discussions with a total of 341 people living in Southern Sudan, Côte d'Ivoire and Haiti and held meetings with 30 humanitarian, peace and security professionals working at national, regional and international levels (Csáky, 2008). The fact that the two studies reached such similar findings across six different country contexts strengthens the validity of their findings.

Whilst troops associated with the UN Department of Peacekeeping Operations were identified as a particular source of abuse, the SC-UK study states:

our fieldwork revealed cases of abuse associated with a sum total of 23 humanitarian, peacekeeping and security organisations. These include civil humanitarian agencies such as those delivering food and nutritional assistance, care, education and health services, reconstruction, shelter, training, and livelihood support as well as military actors providing peace and security services. (Csáky, 2008, p. 8)

The HAP study found that:

Although beneficiaries know sexual abuse and exploitation is going on around them and perceive the risks, the vast majority

*of the 295 beneficiaries consulted said they would **not** complain about misconduct. Consequently, complaints are rare and investigations even rarer. (Lattu et al., 2008, p. 3)*

For both studies, it is this reluctance to complain that helps explain the chronic under-reporting of incidents of sexual exploitation and abuse.

Factors contributing to the under-reporting include:

- Fear of losing much-needed material assistance;
- Fear of stigmatisation;
- Fear of a negative economic impact;
- Fear of retribution or retaliation;
- Not knowing how to report;
- Feeling powerless to report;
- Lack of effective legal services;
- Lack of confidence that a complaint will be handled confidentially;
- Lack of confidence that a complaint will be taken seriously and passed 'up' for action.

As noted by the SC-UK report:

Crucially, however, many of these measures [put in place within the humanitarian system since 2002] are dependent on the willingness and ability of children and their carers to report the abuse they experience. If this is not assured, then the system as a whole will remain fundamentally flawed.

The report concluded that:

There are three important gaps in existing efforts to curb abuse and exploitation:

1. *Communities – especially children and young people – are not being adequately supported and encouraged to speak out about the abuse against them.*
2. *There is a need for even strong leadership on this issue in many parts of the international system – notably to ensure that good practices and new procedures are taken up and implemented.*
3. *There is an acute lack of investment in tackling the underlying causes of child sexual exploitation and abuse in communities – abuse not just by those working on behalf of the international community but by a whole range of local actors. (Csáky, 2008, p. 1)*

Both studies concluded that a massive task still faces the humanitarian system if such practices by aid workers are to be curbed and eliminated.⁴

The final report of research on *Preventing Corruption in Humanitarian Assistance* sponsored by the International Secretariat of Transparency International was published during 2008⁵. The research was undertaken by Feinstein International Centre of Tufts University in collaboration with the Humanitarian Policy Group (HPG) at the Overseas Development Institute (ODI) and built on earlier studies by HPG in 2005 and 2006. The objectives of the study were to understand the ways in which corruption manifests itself in humanitarian assistance and to engage with agencies to understand the perceptions of corruption and how agencies are managing them. Seven agencies (four of which are HAP members) volunteered to be part of the project (Action Aid, CARE International, Catholic Relief Services, Islamic Relief Worldwide, Lutheran World Federation, Save the Children and World Vision International) and allowed researchers access to their headquarters staff and documentation along with similar access to field programmes in seven crisis-affected countries. The countries and the details of any findings relating to specific agencies were kept anonymous to ensure honest discussions with agency staff. The study will form the basis of a handbook on good practices on mitigating corruption risk in humanitarian assistance to be published in 2009 by Transparency International (TI).

4 *Dialogue started between HAP and SC-UK on options for the development of a global inspectorate on prevention and investigation of sexual exploitation and abuse. See Chapter 5.*

5 *The study can be downloaded at <http://www.transparency.org/publications/>*

Corruption, as defined by TI is “the abuse of entrusted power for private gain”. The study found that “the circumstances in which humanitarian assistance is provided make it particularly vulnerable to abuse” (TI, 2008, p. 8). Emergency programming sectors and programming processes that were seen as particularly high risk included:

- food aid;
- construction;
- cash programming;
- health programming involving scarce and high-priced drugs;
- assessment, targeting and registration of recipients;
- trade-offs between speed and control;
- human resource management;
- financial management and audits;
- vehicles and fleet management;
- logistics and supply chain management;
- sexual abuse and exploitation;
- partnership arrangements: “forms of partnership emphasizing the empowerment of the partner, while preferable in terms of sustainability, were perceived to involve higher risks of corruption since there were often fewer controls associated with this approach [compared to a sub-contracting approach with clear contractual arrangements]” (p. 16).

The seven agencies participating in the study were found to be using “a set of common policies and standard management procedures to control corruption risks ... [but] generally this set ... is not specifically adapted to working in humanitarian emergencies” (p. 17).

Among the findings regarding agency practice, the study found that:

- The better prepared an organisation is for rapid scale-up and the better its surge capacity, the more likely it is that the corruption risks will be mitigated.
- Whistleblower policies were commonly used, but there was considerable variation in practice with some including state-of-the-art, multi-lingual, 24-hour hotlines, outsourced to third party professionals who can be reached by reversed-charge telephone calls. However, despite advance whistleblower mechanisms at the headquarters level “only two field offices reported knowledge of the existence of such mechanisms and in one of those cases it was only a few senior level staff members who were aware of its existence”. Instead, many field offices had created their own local reporting systems including anonymous complaints boxes and specialised committees to investigate corruption and misconduct allegations.

- Whilst there has been a significant focus in recent years on initiatives to improve programme quality, standards, learning and accountability, “Agencies are still not engaging in comprehensive monitoring, and agencies are still largely responsible for reporting on themselves, with little independent involvement in monitoring or evaluation.” (p. 19)
- Whilst there is a significant recognition of the role of programme monitoring and financial monitoring as the best way to decrease corruption, “the reality is that not enough of this is done. ... Even simple post-distribution monitoring in the case of providing material assistance is the exception, not the rule.” (p. 19)
- Upward accountability to donors is shifting as part of the humanitarian reform process (involving greater use of ‘common’ or ‘pooled’ funds) and as donors grapple with increasing humanitarian aid budgets but fewer staff.
- There are no industry-wide minimum standards for corruption prevention.
- Staff often point to improved downward accountability mechanisms as the best means of preventing corruption. However, on this, the study concludes that:

The current focus on greater accountability to the recipients of assistance through initiatives such as the Humanitarian Accountability Partnership (HAP-I) is clearly of huge potential in enabling agencies to better combat corruption risks... There is however a long way to go in ensuring a range of initiatives is institutionalized in standard responses. The field experience review for this study would suggest that initiatives such as complaints mechanisms are not yet part of emergency response practice with only one agency piloting a ‘beneficiary complaint’ procedure. (TI, 2008, p. 20)

Earlier studies in Afghanistan and Liberia by Savage (2007a; 2007b) that fed into the final report was cited as having found “that disaster affected populations were hugely ill-informed about the work of aid agencies and their entitlements”. (p. 20)

The main obstacles in the mitigating and preventing corruption in humanitarian assistance were identified as:

- Limited capacity to undertake monitoring – “as consistently as monitoring was praised as essential in the fight against corruption, agencies reported that they had limited capacity (staff or money) to monitor as thoroughly as needed” (p. 24);
- Lack of analysis of specific corruption risks in different contexts as part of emergency preparedness planning;

- Lack of incentives (for agency staff, staff in partner agencies or in communities) to report corruption;
- Lack of safe channels either for staff or for recipient communities to report corruption;
- Inadequate attention to 'non-financial' corruption and corruption outside agencies– “Many programme staff still believe corruption is about finance and procurement, and do not accept that it is fundamentally a programme quality issue” (p. 25);
- Lack of learning by humanitarian agencies from the anti-corruption efforts of international financial institutions such as the World Bank’s Department of Institutional Integrity;
- Lack of system-wide analysis and coordinated action by humanitarian agencies to address endemic corruption in specific contexts or “to address the problem of circulation of corrupt staff among agencies” (p. 26).

A concluding comment was that:

The study reinforced the perception that corruption is a significant threat to the humanitarian system and greater priority should be given to prevent corruption in humanitarian assistance. This is something of a vicious circle, as without clear signals from leadership within agency headquarters and country offices that corruption is a priority, incentives and mechanisms for uncovering and dealing with corruption are likely to remain weak. As with many issues vying for managers’ attention, the issues is not so much whether policies and procedures for combating corruption are in place, but whether they are being effectively implemented at field level. (TI, 2008, p. 27)

The 2008 *Global Accountability Report* (GAR) published by the One World Trust (OWT) presented its annual assessment of the capabilities of 30 organisations (ten inter-governmental organisations; ten non-governmental organisations and ten trans-national corporations) to be accountable. The assessments use the four dimensions of the Global Accountability Framework (Blagescu et al., 2005):

- *Transparency*: being open and transparent about activities and decisions;
- *Participation*: involving internal and external stakeholders in the activities and decisions that affect them;
- *Evaluation*: evaluating performance on an ongoing basis and incorporating learning into policy and practice;
- *Complaints handling*: being responsive to complaints from internal and external stakeholders.

Within each dimension, an organisation's accountability capabilities are measured by assessing the integration of key good practice principles in policies and procedures and the existence of management systems to support their implementation.

Assessments using the Framework were begun in 2006 and so, with this third in the annual GAR series, a total of 90 global organisations have now been assessed.

Eight of the 30 organisations assessed in 2008 may be judged as being key actors in the international humanitarian system and the summary results for these organisations are shown in Table 1.

Box 2. Organisations Assessed in the 2008 Global Accountability Report

Inter-Governmental Organisations

- European Bank for Reconstruction and Development (EBRD)
- World Bank – International Finance Corporation (IFC)
- UN Children's Fund (UNICEF)
- European Investment Bank (EIB)
- UN Office of the High Commissioner for Refugees (UNHCR)
- African Development Bank (AfDB)
- International Organisation for Migration (IOM)
- Asia Pacific Economic Cooperation (APEC)
- North Atlantic Treaty Organisation (NATO)
- International Atomic Energy Agency (IAEA)

Non-Governmental Organisations

- International Federation of Organic Agriculture Movements (IFOAM)
- Plan International
- Catholic Relief Services (CRS)
- Transparency International (TI)
- Islamic Relief
- International Planned Parenthood Federation (IPPF)
- Fairtrade Labelling Organisations International (FLO)
- International Committee of the Red Cross and Red Crescent Societies (ICRC)
- CARE International (Secretariat)
- International Olympic Committee (IOC)

Trans-National Corporations

- BHP Billiton
- Royal Dutch Shell
- Carrefour
- EDF
- Unilever
- Goldman Sachs
- Cargill
- Deutsche Post World Net
- Halliburton
- CEMEX

None of the humanitarian organisations scored well in relation to transparency capabilities. Indeed, four organisations scored less than 30 (out of a possible maximum of 100). The GAR had this to say about the results in relation to UNHCR, IOM and UNICEF:

The low scores are somewhat surprising; each scores only fractionally higher than NATO and the IAEA [the two IGOS involved in defence and security, two traditionally secretive areas of work]. Yet these organisations are more in the public eye and their influence on individuals is significantly more direct and tangible. ... However, despite their clear public impact, none of these organisations have even the most basic of transparency capabilities, lacking both policies and management systems to address transparency issues. UNICEF have recognised this accountability gap and is in the process of developing an information disclosure policy. (GAR 2008, p. 32-33)

Table 1. Summary Results for assessed humanitarian organisations

Organisation	Transparency	Participation	Evaluation	Complaints and Response	Overall	
					Accountability Capabilities	Ranking
UNICEF	26	89	98	64	69	3
Plan Int'l	51	82	83	60	69	3
CRS	38	82	90	63	68	6
Islamic Relief	54	81	72	66	68	6
UNHCR	29	87	83	64	65	11
ICRC	40	80	78	24	56	15
IOM	27	75	63	28	48	21
CARE Int'l ⁶ (Secretariat)	15	71	94	0	45	23

All of the humanitarian organisations scored strongly (>70) in relation to participation capabilities (equitable members control and external stakeholder engagement capabilities). Apart from IOM, all humanitarian organisations assessed scored strongly (>70) in relation to evaluation. This reflects the significant role accorded to evaluation in approaches to accountability in

⁶ The scores for CARE International are misleading in that the GAR team assessed only the Geneva-based International Secretariat as its unit of analysis, and the results can not be taken to be representative of the scores of the lead (operational) members of CARE International had they been included in the assessment..

the humanitarian sector over the last 10-15 years and the success of efforts by ALNAP and other groups (e.g. the DAC Evaluation Group and the UN Evaluation Group) to encourage the use of evaluation and improve evaluation practice. None of the humanitarian organisations scored strongly in relation to complaints and response handling capabilities.

In what may be taken as the GAR's summing-up of the current status of accountability, it concludes as follows:

[Since the 1980s] there have been major advances in extending principles of accountability to the global level. Debates on accountability have evolved considerably and a growing body of good practice has emerged. However, in the light of significant global challenges, global organisations must do better. The results of this year's Report reveal that even the top performers have only basic accountability policies and systems in place. If global organisations are to be part of the solution to global problems, they need to work with their key stakeholders to build accountability capabilities that address both organisational and stakeholder needs. (GAR, 2008, p. 9)

The Listening Project of the Collaborative for Development Action (CDA) represents the most extensive attempt ever undertaken to consult with, and give voice to, the views of beneficiaries of development and humanitarian aid. Begun in 2005 by CDA and interested agencies and individuals, by mid-2008 the Listening Project had completed studies by Listening Teams in 13 different countries/contexts (Ecuador, the Thai-Burma/Myanmar Border, Sri Lanka, Kenya, Kosovo, Thailand, Zimbabwe, Angola, Bolivia, Ethiopia, Bosnia, New Orleans USA, and Aceh, Indonesia). Over 240 staff from more than 65 local and international NGOs participated in the listening exercises, holding about 1,500 conversations with approximately 3,500 people. In September 2008, four *Issue Papers* presented common themes and crosscutting issues emerging from the completed studies. Shortly after, the Executive Director of the Collaborative Learning Projects at CDA Mary B Anderson published a paper "The Giving-Receiving Relationship: Inherently Unequal?" in the *Humanitarian Response Index (HRI) 2008*. Though the Listening Project (LP) still has several more country studies to complete and write-up and the Issues Papers and the paper in HRI 2008 do not represent the final product of the project, they provide a rich body of material raising many important challenges for the international assistance and aid agencies.

The *Issues Papers* and the paper in HRI highlight four themes emerging strongly from the studies so far:

- International assistance as a delivery system emphasises speed and efficiency;
- The importance of agency presence at the community level;
- The weakness of current approaches to participation and partnership;
- The dominance of external agendas and priorities.

The following points are taken variously from the different papers. Listening Teams encountered many people, not only in recipient countries but also in donor offices and countries, who felt that international assistance had become an “industry” focussing on the efficient delivery of goods and services rather than on building relationships. “Efficiency” was frequently found to be equated (wrongly) with “speed”—not only in agencies working in humanitarian emergencies but also among donors and agencies involved in longer-term development work. Listening Teams heard many people suggest “slowing down” as one step towards improving the outcomes and impacts of assistance.

Even people who have experienced rapid-onset emergencies often say that aid agencies should ‘go more slowly’, ‘invest the necessary time’ to ‘listen to people’ in order to ‘learn about the real circumstances,’ and get to know people. (LP, 2008a, p. 4)

For their part, donor and aid agency staff also reported that they feel hurried by tight time-frames for proposals and pressures to use funds quickly and, as a consequence, spend less time in communities. This lack of understanding of the communities was frequently seen as the source of mistakes or the selection of interventions and activities that were unnecessarily costly that, with more local consultation, could have been avoided.

People commented on the similarity in the ways that many donors and NGOs operate and that the space for creativity and innovation seems to be circumscribed.

The more the international assistance community coordinates their approaches at the donor/headquarter levels, the fewer the degrees of freedom for locally based innovative activities that exist. For instance, as donors and INGOs learn from experience and codify their improved understandings of aid effectiveness into policies and ‘best practices,’ many lose a focus on balancing these with the necessity of learning from local contexts. (LP, 2008a, p. 9)

Listening Teams heard that:

[M]any people express their anger at the arrogance of outsiders who bring 'pre-packaged' assistance. They resent international 'targets', 'standards' or coordination mechanisms that ignore local context and realities. (LP, 2008a, p. 9)

Thought admirable in its intention of supporting local institutions, the use by many donors and international NGOs of local and indigenous NGOs as partners in their programming is seen as adding more “middlemen” between the funders and receivers of international assistance. Listening Teams found that:

People in recipient communities find this confusing and distancing—they often do not know who is really behind the assistance that they see in their communities and they do not, therefore, know who to hold accountable or how to do so. (LP, 2008a, p. 7)

While some agencies use the language of “clients”, most recipients do not identify themselves as “clients” because they say that they have no power to hold aid agencies accountable. Lack of knowledge of what they should expect, fear of losing out if they complain, and not knowing where to complain to were all cited as reasons as to why recipients and communities did not complain more.

Several people told of sincere attempts to complain and their frustration when they arrived at an NGO office and no one would talk with them or listen to them, or when they called a number they had been given by an aid agency and found it had been disconnected. (LP, 2008a, p. 11)

“Presence” emerged as a strong theme in what the Listening Teams heard. The reasons given as to why presence was important were listed as:

- “Be here to understand us and our needs”
- “Be here to monitor and assess impacts”
- “Be here for accountability and to take responsibility”
- “Be here for collegueship, mutual learning and partnership”
- “Be here to provide protection” (LP, 2008b).

The Listening Teams found that:

Across the different contexts people want to play active roles in the entire project cycle and aid process: from identifying needs,

determining priorities, to designing and choosing projects/ activities; from selecting who receives aid (and what the criteria are for selection) to implementing and managing the projects; and finally, to monitoring and evaluating the impacts. Of these, needs identification, prioritization, choosing interventions, and selecting who receives assistance were brought up most frequently. (LP, 2008c, p. 2)

The Listening Teams identified the following factors as being most significant in explaining why active involvement, even though it is universally sought, is missing from so many people's experience with international assistance efforts:

- The current aid system and its structures, time frames and incentives;
- Agencies often don't include enough people or the right people. Too often those "selected as 'representatives' ... do not in fact represent most local people's interests. Nor do they adequately inform people of the content of meetings and decisions." However, in several locations the role of NGOs in ensuring the inclusion of marginalised groups such as women and ethnic minorities was commented upon favourably.
- The willingness of communities to become involved is often determined by the way an outside organisation approaches communities and how its staff members conduct themselves;
- How well communities are informed of the process of participation and the project itself and the appropriateness of the language to be used in discussions with the agency representatives;
- People may find it difficult to give the time required to participate due to responsibilities in their personal and professional lives.

People also talked about the funding priorities and donor trends that seem to shift every couple of years, affecting the types of assistance that are available. "They say that the result is that donors and aid agencies have 'projectitis' and develop projects to fit what is 'trendy' or 'sexy' at the time." (LP, 2008d, p. 4)

People were found to resent assistance that is pre-determined and inappropriate. One Listening Team summarized this in the following terms: "There are common complaints that NGOs take a blanket approach and arrived with pre-planned programmes." Listening Teams "heard many people express their anger at the arrogance of outsiders who pre-determine need in categories that they feel are biased and inappropriate in their society, or when they apply programming approaches that have been developed elsewhere in quite different contexts". Such resentment is increased "when people are urged to 'participate' in programme planning and design, but they soon see that choices and decisions have already been made—by outsiders".

A combination of pre-packaged programmes, the use of intermediary organisations before aid reaches the communities and the lack of consultation and flexibility in the design of programmes are frequently viewed as causing significant levels of “wastage” in the aid system.

Such trenchant points generated through such an extensive consultation with aid beneficiaries present the development and humanitarian aid systems with a challenging critique. It will be telling to see how, once the Listening Project is completed and the results are fully analysed and published, the principal groupings of agencies and donors manage their response.

The results of the Listening Project are supported by several of the evaluations that were reviewed where the evaluation team had consulted beneficiaries. For instance, inadequate consultation with beneficiaries was revealed by several of evaluations that actually considered these issues. In the case of an international NGO in Bangladesh responding to Cyclone Sidr, an evaluation team found that the hygiene kits distributed did not include key items needed by women, apparently because the kits were designed after a consultation with a community group that allegedly included few women. Soap or saris had not been distributed by the agency in one district despite the agency’s own assessment report stating that many women had lost their clothes during the Cyclone and had not been able to wash due to the lack of soap. None of the women served by the programme had received sanitary towels two months after the start of the response.

Certainly all the women consulted in the evaluation focus groups were not consulted and would have requested other items if asked. (Walden et al., 2008, p. 13)

The evaluation team saw the lack of a comprehensive and up-to-date contingency plan as being largely responsible for some of the problems experienced by the agency.

Inadequate provision of information to beneficiaries was revealed by several evaluations. The evaluation of another international NGO in Bangladesh found that:

During group discussions, participants said that households were not informed about the selection criteria, and many beneficiaries were confused about why they were selected and their neighbours were not. (Todd et al., 2008, p. 25)

The evaluation of a large emergency drought relief operation in Kenya from 2004-2006 found that:

... many distributions are still not running to standard.; the entitlement is not displayed in the local language or through pictorial reference; many beneficiaries do not know their correct entitlements; ... and there are no participatory discussions with the beneficiaries about waiting times or distribution arrangements. (Simkin et al., 2008, p. 23)

The most common example of 'inflexible' and 'pre-packaged' programme design is the widespread use by agencies of average family sizes when calculating the assistance to be provided to households. Many general food distribution programmes, for instance, provide standard family rations with no variation allowed for differences between the actual family size and the average family size (which is often taken to be 5 or 6 individuals). Though the standard family model is widely acknowledged as benefiting those families that are smaller than the average size and penalising those families that are larger than the average size, the standard family ration model continues in widespread use because of the distinct administrative and logistical advantages of treating all beneficiary families as being of the standard size.

However, the evaluations did reveal one case where an agency distributing WFP-supplied commodities to IDPs in northern Uganda had modified its programme in order to address the inequities and inefficiencies of the standard family size assumption. Once the shift had been made to a system in which food rations were given according to the actual number of people in each household, the distributions became smoother running and the agency was able to hand over the physical distribution activity to the beneficiaries themselves and the Food Management Committees established in each IDP camp (Das and Nkutu, 2008, p. 26).

Box 3. Consideration of accountability to intended beneficiaries and local communities in the evaluations reviewed

Of the 22 evaluations reviewed⁷, the majority (16 or 68%) indicated that beneficiaries and/or affected populations had been included among the stakeholders consulted during the evaluation. Four evaluations (23%) did not include beneficiaries and/or affected populations among the stakeholders consulted and two (9%) were unclear as to whether beneficiaries and/or affected populations had or had not been included.

Does the fact that two-thirds of the evaluations reviewed actually included beneficiaries among those consulted represent an improvement? Five years ago the ALNAP Review of Humanitarian Action in 2003 judged 52% of the evaluations to be “poor” in terms of the quality of consultation with and participation by primary stakeholders (beneficiaries and non-beneficiaries) within the affected population during the evaluation. Whilst it is not possible to directly compare the 23% non-inclusion figure from 2008 with the 52% ‘poor’ figure from 2003, it would appear that there has been a significant improvement in the practice of humanitarian evaluations over the last five years.

As to the use made of the information and perspectives offered by the beneficiaries, the picture is less impressive. By the reckoning of this reviewer, only 10 evaluations (45%) explicitly considered accountability to intended beneficiaries and local communities in their reports. Nine (41%) did not explicitly consider accountability to intended beneficiaries and local communities and in three cases (14%) it was unclear or difficult to determine. Even when accountability to intended beneficiaries and local communities was explicitly considered, it was often with regard to particular issues (such as beneficiary selection mechanisms and the operation of village relief committees) that had been raised in focus group discussions or interviews by the team

⁷ Evaluations produced in 2008 and present in the ALNAP Evaluative Reports Database on 8/1/09 were used. Some of the studies present were not felt to be relevant and so were not included. A later search of the ALNAP ERT Database revealed additional evaluations undertaken during 2008 by UNHCR and other organisations that appear to have been added since the initial search of the ERD in early January. Due to time constraints, it was not possible to include these reports in the review. Of the 22 evaluations, five were of programmes undertaken by components of the UN system and inter-governmental organisations; eight were of programmes funded by bilateral and multi-lateral donor organisations; eight were of programmes undertaken by non-governmental organisations and one was an inter-agency evaluation undertaken by OCHA on behalf of the IASC. No evaluations conducted within the Red Cross and Red Crescent family appear to have been placed on the ALNAP Database during 2008. Within the donor group, five of the eight evaluations had been commissioned by ECHO and, within the NGO group, four of the nine evaluations had been commissioned by the Norwegian Refugee Council. Whilst this reflects a commendable commitment towards evaluation and the sharing of results by these two organisations (one of which is a HAP member), this inevitably skews the results and reduces the representativeness of any conclusions that may be drawn from the results.

with beneficiaries. In none of the evaluations could it be said that the accountability systems in place had been systematically reviewed and assessed by the evaluation.

It is somewhat paradoxical that when evaluation is regarded as a significant component in the accountability framework of the humanitarian system, none of those reviewed systematically considered the accountability systems in place and more than half of them do not even explicitly consider accountability to intended beneficiaries and local communities in their approach or the way their reports were structured. It would appear that the 'accountability function' of evaluation is seen as being rendered simply by commissioning the evaluation and placing the resultant report in the public domain. There is a strong case for evaluation TOR to require humanitarian evaluations to explicitly consider the operation of the accountability systems in place as well as to consult more consistently and systematically with the intended beneficiaries and local communities.

Whilst there has long been ample evidence that improved accountability to beneficiaries and affected populations invariably results in more appropriate and more effective programmes, it has taken longer to demonstrate a clear financial 'business case' that improved accountability is financially advantageous to humanitarian agencies. Though not producing a comprehensive business case, a study of World Vision's Humanitarian Accountability Team established as part of the agency's Tsunami Response in Sri Lanka, demonstrated improved effectiveness and efficiency—including savings of over US\$ 5 million largely by preventing unsuitable or unnecessary construction. The resources saved were reprogrammed in other areas or directed towards other beneficiaries in the Tsunami response (World Vision International, 2007; Srodecki, 2008).

1.4 Principal developments within the humanitarian system

Amongst the evidence of inadequate or poor accountability practices, there is also plenty of evidence of developments and progress being made during 2008 in many different areas of the humanitarian system. This section highlights the principal developments by broad organisational type: NGO, UN and multilateral organisations, donor organisations and cross-sector networks such as ALNAP.

1.4.1. Non-Governmental Organisations

1.4.1.1. Organisations and initiatives working to improve accountability through approaches including third party compliance verification and certification

Humanitarian Accountability Partnership (HAP) International

2008 was a year of significant achievements and new developments for HAP.⁸ Nine new Full Members were added during 2008, representing a 50% increase and taking the total number of Full Members to 27. People In Aid and CPDI joined as Associate Members, taking the number in this category to six.⁹

Box 4. New Full Members Joining HAP in 2008

- Coastal Association for Social Transformation (COAST) Trust, Bangladesh
- Sungi Development Foundation, Pakistan
- Muslim Aid, UK
- Church World Service (CWS) Pakistan/Afghanistan
- Naba'a (Developmental Action Without Borders), Lebanon
- Action by Churches Together—International, Switzerland
- Lutheran World Federation, Switzerland
- Merlin, UK
- Coordination of Afghan Relief (COAR), Afghanistan

During the year, DanChurchAid and Tearfund successfully completed the HAP Certification process, joining the Danish Refugee Council, OFADEC and MERCY Malaysia as being “Certified in the HAP 2007 Standard.” The number of members enrolled in the certification scheme also increased so that, by the end of the year, 14 other members were at different stages of the process.

The Guide to the HAP Standard was published in March 2008 and by the end of the year the first print run of 1,500 copies was nearly sold out with 60% of sales going to humanitarian agencies in 94 countries. Over 1,000 readers downloaded chapters or the full text of *The Guide* from the Oxfam website. Launches of *The Guide* took place in London and Geneva. During

⁸ *Progress in the Standard Review process, in the development of the Accreditation Standard and towards inter-operability between HAP, Sphere and People In Aid; recognition of the HAP Standard by bodies such as the International Organisation of Supreme Audit Institutions, and other significant developments in HAP's work in 2008 are presented in Chapter 5.*

⁹ *Associate Members: CPDI – Pakistan, Danida, DFID, Mango, People In Aid, SIDA.*

the London launch in May, the UK International Development Minister, Gareth Thomas, stated that he “can imagine a time when DFID will make it [HAP certification] a prerequisite for funding”. In October, when addressing the UNHCR Executive Committee meeting in Geneva, the Minister stated that, “Agencies urgently need to put in place standardised monitoring arrangements. And where accountability mechanisms already exist—such as the Humanitarian Accountability Partnership International—we must use them more systematically”.

In line with HAP’s *New Emergencies Policy* (NEP) adopted in June 2004, efforts by HAP members and HAP staff to collectively apply the HAP Principles of Accountability continued and were further developed during 2008. In Pakistan, the HAP Office continued its programme of support to members and other agencies. Following the earthquake in Baluchistan Province in October 2008, HAP members and some non-members involved in the response agreed to a collective effort to apply the Principles of Accountability. The HAP Office deployed staff to the area during November to work with agencies and community members to identify accountability successes and areas for improvement in the implementation of the HAP Principles of Accountability. The HAP NEP deployments and member activities in response to Cyclone Sidr in Bangladesh and Cyclone Nargis in Myanmar are discussed in Section 1.5 below.

AMAN: the Palestinian Coalition for Accountability and Integrity

AMAN is the national chapter of Transparency International within Gaza and the West Bank. 2008 saw the completion of the pilot phase of the Nazaha Project, a joint initiative of AMAN and the Konrad-Adenauer Stiftung to develop and test a Certificate of Good Governance for Palestinian NGOs. Three national NGOs participated in the pilot: Arab Thought Forum, Riwaq—the Centre for Architectural Conservation, and Musawah—the Palestinian Centre for the Independence of the Judiciary and the Legal Profession. The three organisations were initially assessed in regard to five major areas: institutional development; socio-economic impact; financial efficiency, health and growth; accountability transparency, reporting and communication; and sustainability. A technical team made up of members of the AMAN Coalition undertook a series of project visits and interviews with staff and Board members. Scoring of performance was undertaken using the NGO Star model for evaluating NGO performance developed by the US organisation Foreign AID Ratings. The three organisations exceeded the certification threshold and were awarded the pilot programme’s Good Governance Certificate.

The final meeting of the Nazaha pilot in May 2008 also reviewed the results of the third and final opinion poll on perceptions on the level of corruption within the Palestinian NGO sector. The poll revealed a good awareness of

the pilot project and a more perceptive awareness of the corruption problem when compared to the results of the first such survey conducted a year earlier. AMAN has responsibility for coordination of the “NGOs Against Corruption” campaign in the future as well as managing the Good Governance Certification process.¹⁰

Charities Evaluation Service (CES), UK

In 2008, the Charities Evaluation Service launched the Third Edition of PQASSO—the Practical Quality Assurance System for Small Organisations. Since the publication of the first edition in 1997, 11,000 copies have been distributed. It also began implementing the PQASSO Quality Mark, launched in 2007, which offers an accreditation service to UK-based voluntary and community organisations wishing to show that their achievements against PQASSO standards have been externally verified. The process followed by the PQASSO Quality Mark commences with a self-assessment by the organisation against PQASSO and its application to the Quality Mark process. A peer reviewer is then appointed who undertakes a desk review and site visits and submits a report; the report is then reviewed to determine whether the requirements for the award of a Quality Mark have been met.¹¹

Cooperation Committee for Cambodia (CCC)

CCC is the principal professional association of NGOs in Cambodia that was established in 1991. By 2008, its membership comprised 71 international NGO, 27 Cambodian NGOs and seven associate members. Within the framework of its Good Practice Project (GPP), CCC formally launched a Code of Ethical Principles and Minimum Standards for NGOs in Cambodia in June 2007. The Code includes a certification process involving an initial assessment of whether mandatory requirements have been met, followed by a desk review and field assessments undertaken by a working group made up of CCC GPP staff and CCC member agencies. By the end of 2008, 23 organisations had applied for certification, 18 of which completed the process and seven certified against the NGO Code, thereby being recognised as role model NGOs in Cambodia. The seven agencies are: Mith Samlanh, Salvation Center Cambodia (SCC), Vicheasthan Bondos Bodal Neak Krup Krong Karngea Akphiwat (VBNK), Krousar Yoeung (KrY), Community Capacities for Development (CCD), Youth Star Cambodia and the Cooperation Committee for Cambodia (CCC) itself. Judging by the names, Cambodian NGOs have been disproportionately represented in the first batch of certified agencies. Certification lasts for three years whereupon the agencies have to reapply and repeat the certification process.

10 For more details see www.aman-palestine.org and www.kas.de.

11 For more details see www.ces-vol.org.uk.

Credibility Alliance, India

Credibility Alliance is a consortium of voluntary organisations committed to enhancing accountability and transparency in the Indian voluntary sector through good governance. It was registered as an independent, not-for-profit organisation in 2004 after an extensive consultative process throughout India. As of March 2009, Credibility Alliance had 462 member organisations.

Initially the Alliance focussed on the development and dissemination of “Minimum Norms” and “Desirable Norms” also referred to as Best Practice Norms. In 2007, the Alliance introduced an accreditation process involving external assessment managed by the Accreditation Cell in the Alliance and review of results by the Accreditation Panel and certification award to successful applicants. As of March 2009, 21 member organisations had received accreditation.

Pakistan Centre for Philanthropy (PCP)

PCP was established in 2001 following research conducted by the Aga Khan Foundation (AKF) and a National Conference on Indigenous Philanthropy. The AKF research had indicated that indigenous philanthropic activity generated up to five times the levels of funding provided by foreign aid. In 2003, PCP developed a framework for promoting regulation among National Philanthropy Organisations in Pakistan, the centrepiece of which is a certification regime modelled on that of the Philippine Council for NGO Certification. The process involves the evaluation by PCP staff of the governance, financial management and programme delivery of applicant organisations. Certified organisations are able to obtain not-for-profit, tax exempt status from the Pakistan Central Board of Revenue for a period of two years whereupon the organisation has to re-take the certification process. By the end of 2008, 140 organisations were certified and in receipt of the “Seal of NPO Good Practices”.¹²

People In Aid

During 2008 two members (ACORD and CAFOD) achieved “Committed” status against the People In Aid Code of Good Practice. This brought the total number of “Committed” members to 11. The number of members that had achieved “Verified” status against the Code (involving verification of the adequacy of the monitoring and stakeholder consultation systems in place and the completeness and accuracy of the information by an external social auditor) remained at 8 (Concern Worldwide, Health Unlimited, Leprosy Mission International, Mission East, Red Cross UK, RedR, Save the Children UK, Tearfund). The People In Aid network had 139 members by the end of 2008.

12 For more details see www.pcp.org.pk/resources.html [viewed 14/3/09]

At the end of 2008, it was agreed that People In Aid and HAP would undertake a joint baseline analysis of an organisation sharing membership of both People In Aid and HAP. Merlin was identified as the member for the pilot, planned for early 2009.

Philippine Council for NGO Certification (PCNC)

PCNC was established in 1998 by six national NGO networks to certify non-profit organisations as meeting established minimum criteria for financial management and accountability and thereby qualify as a 'donee' institution for which charitable donations are tax deductible. The PCNC model has since been adopted or followed in other countries. Between 1998 and 2007, PCNC received over 1,500 applications for certification and certified 858 applicant organisations. Certification is undertaken by trained volunteers and involves the review of audited financial reports, proof of compliance with government rules and regulations and field visits to the programmes of applicant NGOs. Certified NGOs are in effect awarded a "Seal of Good Housekeeping" and join the membership of the PCNC.

In October 2007, in what the PCNC Chair described as a "bolt from the blue", Executive Order 671 was issued by President Arroyo, divesting PCNC of its mandate to certify NGOs for donee institution status and transferring the function to the Bureau of Internal Revenue (BIR). EO 671 entered into effect in November 2007. Following a lengthy process of discussions by PCNC and its members with the relevant authorities, in April 2008, a new Executive Order (EO 720) was issued, superseding EO 671 and reconfirming PCNC as the government's partner in accrediting NGOs as donee institutions. A provision of EO 720 is that the Philippine Department of Social Welfare and Development is represented on the PCNC Board and other relevant government agencies are involved depending on the type of applicant NGO being certified.

1.4.1.2. Organisations and initiatives working to improve accountability through approaches other than third-party compliance verification and certification

Disasters Emergency Committee UK

In July 2008, at its Annual General Meeting, the UK Disasters Emergency Committee—the national fundraising mechanism for UK humanitarian aid agencies—unveiled a new Accountability Framework, prepared with the help of the international professional services firm Ernst & Young. According to the DEC Annual Report 2007/08, the specific objectives of the Accountability Framework are to:

- ensure that the DEC remains publicly and independently accountable;
- strengthen the Board's ability to hold members and the Secretariat to account;
- ensure members have mechanisms of accountability to beneficiaries;
- improve performance;
- enhance reputation through a commitment to open information.

The Accountability Framework is organized around the following six accountability priorities:

- We run well managed appeals;
- 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 experience.

During the year, "a rigorous process of assessment and reporting against accountability priorities...was rolled out" (DEC, 2008). The summary results of this process for all member agencies were presented in the Annual Report (DEC, 2008).

Emergency Capacity Building Project (ECB)

During 2008 the Emergency Capacity Building Project¹³ secured funding for a second phase covering a five-year period. According to the ECB website, Phase II will "continue to nurture innovation and seek new solutions to shared challenges, whilst ensuring that this new knowledge translates into concrete improvements in the speed, quality and effectiveness of emergency preparedness and response. In Phase II, ECB will scale up its impact, both in the field and across the humanitarian sector, through a series of new partnerships, including governments, academia and the private sector."

Meanwhile ECB and its members continued to disseminate *Impact Measurement and Accountability in Emergencies: The Good Enough Guide* that had been published in 2007.

Listen First

Listen First is a two and a half year long joint research project that was finalised and reported on in 2008. The project was undertaken by Concern (a

¹³ The ECB is a project of CARE, Catholic Relief Services, Mercy Corps, Oxfam, Save the Children and World Vision.

Full Member of HAP) and Mango (an Associate Member of HAP). Its aim was to research practical ways for an agency to manage downward accountability on a systematic basis across different country programmes.

The work began with literature reviews in 2005. Detailed fieldwork was undertaken between mid-2006 and mid-2008 with Concern's programmes in Pakistan, Ethiopia, Cambodia and Angola. Concern Burundi and Concern Kenya trialled tools that were developed during the project. The fieldwork focused on:

- testing practical definitions of downward accountability and management tools;
- developing processes for field staff to assess their current performance and identify improvements;
- researching communities' views of current performance and how useful they found Concern's work;
- understanding the opportunities and constraints for managing downward accountability in practice.

The Listen First Framework is at the heart of the approach developed during the research (see Section 1.6) and is seen as being directly compatible with the HAP 2007 Standard.

The approach uses the Listen First Framework to structure three central processes:¹⁴

- Workshops for staff to discuss and assess current levels of accountability, and to identify improvements for their specific context.
- Research into local communities' views of how accountable staff are in practice, and how useful they find the NGO's work. This is split by gender.
- Summary reports for managers to understand the level of accountability achieved in different projects. These can be quantified.

German NGO Platform (VENRO)

On 11 December 2008, during its general assembly, VENRO adopted a new code of conduct for its member organisations "VENRO Verhaltenskodex: Transparenz, Organisationsführung und Kontrolle". The code sets forth binding rules for the work of NGOs. It contains principles on management, communication and impact monitoring as well as guidelines for their implementation. Among other things, the code obliges members of VENRO to publish annual reports and to clearly identify and report expenses on marketing and administration.

Sphere Project

¹⁴ *The Framework, reports generated by the research, and practical materials developed during the project are available at <http://www.listenfirst.org/>. Approaches and working methods are similar to those used by HAP in some of the services that it offers agencies, particularly in emergencies.*

During 2008 the Sphere Board approved a process for other initiatives that have developed standards for humanitarian response to apply to Sphere to become “Companion Standards”. Criteria to achieve Companion Standard status include the use of a “Sphere like [consultation] process” in their development, terminology and format compatible with Sphere and at least one year of field-testing on the basis of which revisions have been made. The Inter-Agency Network for Education in Emergencies (INEE) was the first applicant and a “Companionship Agreement” was signed between the Sphere Project and INEE in October 2008. Through the agreement Sphere acknowledges the quality of the INEE Minimum Standards, and of the broad consultative process that led to their development and, in effect, recommends that the INEE Minimum Standards be used as companion and complementing standards to the Sphere Humanitarian Charter and Minimum Standards in Disaster Response.

During 2008, plans were developed for a process to revise the 2004 edition of the Sphere Handbook and take account of changing practices and technical innovations in humanitarian practice. The process was launched in February 2009. Each of the five chapters and the Cross Cutting issues of the 2004 edition will be revised by volunteer focal “working groups”, as well as a peer group, and led by a focal point. The next edition of the Handbook is expected to be published in late 2010. The Sphere Board approved that the revision be undertaken in close collaboration with HAP and its process of revising the 2007 Standard, and also with INEE. It is hoped that such collaboration will improve inter-operability between the Sphere Humanitarian Charter and Minimum Standards and the HAP Standard.

In June 2008, discussions between Sphere, HAP and agencies responding to Cyclone Nargis in Myanmar led to the decision to jointly deploy teams to enhance the understanding and improve practice in humanitarian accountability and quality management systems of international and national NGOs involved in the response (see Section 1.5). Learning from the joint deployment led to the decision to launch an Inter-agency Quality and Accountability programme led by a single Co-ordinator.

Steering Committee for Humanitarian Response (SCHR)

At the beginning of 2008 the Steering Committee for Humanitarian Response (SCHR) commenced its Peer Review of Accountability to Disaster Affected Populations. Supported by a part-time facilitator the objectives for the Peer Review are:

- To understand the range and diversity of approaches to accountability to disaster-affected populations;

- To share best practices, challenges, and learning within and between members in taking forward the adoption, integration, and use of different approaches to accountability, and their relative effectiveness and practicality; and
- To inform decisions about whether and how best to prioritise and integrate the diversity of accountability approaches in SCHR agencies and sectors.

Agencies in the first group (Group 1) of members undertaking the peer review were ICRC, CARE International and Save the Children Alliance. Each organisation nominated two people to participate in the review teams, with one person participating in the country visits and both in the headquarters visits. The two countries selected for the Group 1 were Haiti and Côte d'Ivoire. In an important development following an initiative by the UN High Commissioner for Refugees António Guterres, UNHCR is also participating in the SCHR peer review process.¹⁵

A lesson-learning workshop to reflect on the experience of Group 1 and feed the results into the design and work of Group 2 (Oxfam, LWF and UNHCR) was held in July 2008. A workshop to reflect on the experiences of Group 2 and how the Group 1 agencies used their results is scheduled for February 2009. Group 3 (WCC/ACT, IFRC and Caritas Internationalis) are scheduled to undertake their reviews in the first half of 2009.

In order to encourage complete openness between the agencies participating in the peer review process, SCHR members agreed that the results relating to individual agencies would be treated in confidence. Information on the results of the Group 1 process is therefore limited at the time of writing.

Tanzanian National Council of NGOs (NACONGO)

In March 2008, NACONGO published an NGO Code of Conduct setting out the core values of member organisations and the standards they will be expected to maintain in relation to: financial transparency and accountability; human resources; communication and information sharing; relationships and networking. Responsibility for assessment against the code rests with individual members.

¹⁵ In 2008, UNHCR also requested HAP for a head office baseline analysis against the 2007 Standard.

1.4.1.3. Other Developments/events

International Conference on NGO Accountability held in China

A two-day “International Conference on NGO Accountability” was held in Beijing in April 2008. The conference was hosted by the Research Centre of Renmin University and co-organized by the China Social Enterprise Foundation and Fuping Development Institute. It was sponsored by the Ford Foundation and sought to bring international experience and analyses on NGO accountability into a shared space. The conference included discussion of approaches to self-regulation and three Chinese NGO foundations (China Foundation for Poverty Alleviation, the Amity Foundation and the Chinese Youth Development Foundation) developed a framework of common standards (Vielajust, 2008). Whilst some participants were critical of the comparative underrepresentation of grassroots organisations (the majority of participants were apparently from foundations, academia, government-operated NGOs, international NGOs and well known Chinese NGOs)¹⁶, the conference appears to have provided a basis for exchange between Chinese universities and NGOs and their international counterparts, and the further development of approaches to accountability in the Chinese context.

1.4.2. UN and multilateral organisations

The Humanitarian Reform Process

Rollout of the cluster approach and the various financing initiatives continued during 2008.

The cluster approach was introduced by the Inter-Agency Standing Committee (IASC) as a means of improving predictability, response capacity, coordination and accountability by strengthening partnerships in key sectors of humanitarian response, and by formalising the lead role of particular agencies/organisations in each of these sectors. Cluster leads were appointed for 11 clusters (Agriculture; Camp Coordination/Management; Early Recovery; Education; Emergency Shelter; Emergency Telecommunications; Health; Logistics; Nutrition; Protection; Water, Sanitation and Hygiene). Four crosscutting issues were subsequently identified (Age; Environment; Gender; HIV).

By October 2008 there were 26 countries with Humanitarian Coordinators (HC) and the cluster approach had been formally adopted in 19 of these

¹⁶ For more details see <http://alaiwah.wordpress.com/2008/05/15/ngo-accountability-in-china>.

countries¹⁷. The remaining seven HC countries¹⁸ were all expected to formally adopt the cluster approach by the end of 2008. In addition to these countries, IASC-agreed procedures for designating sector/cluster leads in major new emergencies have been followed in ten countries since 2006 (Bangladesh, Dominican Republic, Ecuador, Indonesia, Lebanon, Madagascar, Mozambique, Pakistan, Philippines and Tajikistan). In total, the cluster approach had been used in 29 countries since 2006, a figure expected to increase to 36 countries by the end of 2008. By 2009, it should be possible to say that application of the cluster approach is standard practice in all countries with Humanitarian Coordinators and in all major new emergencies (OCHA, 2008).

With regard to the objective of improved accountability, the Cluster Approach Evaluation Report undertaken in 2007 (Stoddard et al., 2007) was only requested to consider accountability in the limited 'upward' sense. The evaluation team noted that, "Because cluster leadership resides with an agency, not an individual, the senior official of that agency is held directly accountable to the Humanitarian Coordinator for his or her cluster's performance. The HC is then accountable to the Emergency Relief Coordinator (ERC) for the overall performance of all the sectors in the country." To determine whether the cluster approach had "infused accountability into the system", the team asked specific questions all of which received a negative result. Accountability was found "being formalised slowly and on a small scale ... agencies headquarters have not yet formally incorporated cluster responsibilities into their internal policies and systems" (Stoddard et al., 2007, p. 15).

A second evaluation of the cluster approach will take place during 2009. The principal purposes of the "Cluster 2 Evaluation" are described as:

- to assess the main outcomes of the joint humanitarian response at the country level; and
- assess the operational effectiveness of the cluster approach in facilitating and supporting joint humanitarian response at the country level.

It remains to be seen how effectively the objective of improved accountability of the cluster approach is tracked and assessed.

As part of the UN General Assembly 60/124 that established the expanded Central Emergency Response Fund (CERF) in December 2005, an independent evaluation was required after two years. This was undertaken and submitted to the Emergency Relief Coordinator in July 2008 (Barber et al., 2008).

17 Afghanistan, Central African Republic, Chad, Colombia, Côte d'Ivoire, DRC, Ethiopia, Georgia, Guinea, Haiti, Indonesia, Iraq, Myanmar, Nepal, Kenya, Liberia, Somalia, Uganda, Zimbabwe.

18 Burundi, Eritrea, Niger, Occupied Palestinian Territories, Sri Lanka, Sudan, Timor-Leste.

Between March 2006 when the new grant facility became operational and mid-2008, CERF received over one billion US dollars in contributions and disbursed over 1,000 grants in 62 countries. DRC, Sudan and Afghanistan were the top three recipient countries, between them receiving 29% of the total funds allocated by CERF. The food and health sectors were the most important sectors, between them receiving over 50% of the total funds allocated.

The evaluation consulted a wide range of stakeholders including beneficiary groups in the countries visited. The findings were generally positive but with a number of concerns and challenges being noted.

First and foremost, the report concludes that the CERF has made considerable progress towards meeting its principal objectives of improving the timeliness of initial response to sudden-onset emergencies and correcting the inequities of humanitarian financing of neglected emergencies. This is a remarkable achievement.

The CERF has also attracted an unprecedented coalition of donors and should reach its annual target of US\$ 450 million in 2008.

Nevertheless, the ERC is confronted with many challenges, if the promise of the first two years is to be converted into a consistent track record of high quality projects, with a demonstrable benefit to victims of war and natural disasters. The generally positive tone of this report should not allow readers to underestimate the severity of these challenges. (Barber et al., 2008, p. 17)

One of the issues considered by the evaluation team was the potential diffusion of accountability lines created by a centralised fund. According to the team,

Accountability is one of the biggest challenges currently facing the CERF and opinion is divided on how accountability lines should work, amongst donor, operational agencies and Resident Coordinators/Humanitarian Coordinators. (Barber et al., 2008, p. 87)

The complicated nature of the current arrangements are shown in the table below, which also lists the officials having a measure of responsibility for the proper use of CERF funds.

Table 2. Officials having a measure of responsibility for the proper use of CERF funds	
Head of UN agency country office in receipt of CERF funds	Responsible for overseeing the project
RC/HC	Responsible for assessing that the agency office was fit for purpose and that the proposed activities were priorities
Emergency Relief Coordinator (supported by CERF Secretariat and OCHA more widely)	Responsible for approving the agency for the use of funds and, as CERF Fund Manager, is considered by the donors and General Assembly as the person accountable for its use
UN Controller	Responsible by virtue as having advanced the funds and then accepted a report of their proper use
Finance Director of UN agency in receipt of funds	Responsible for signing off on the proper use of the funds
Compiled from Barber et al., 2008, p. 88.	

Recognising the need to simplify matters, an international management and auditing firm was commissioned to develop a Performance and Accountability Framework for the CERF.

The CERF process at the field level was perceived by non-UN observers as being insufficiently transparent in nearly all of the country case studies undertaken. In Bangladesh, “INGOs reported that they were not even aware that CERF funds were allocated for cyclone Sidr response, and neither were local NGOs or INGOs involved at any stage in discussion with UN agencies/IOM of CERF prioritisation process”. In calling for a greater level of transparency, the evaluation team saw the key to a transparent allocation of CERF resources lying in “functioning cluster or sectoral coordination mechanism in which priorities and available capacity can be considered in a collegial way among key actors” (Barber et al., 2008, p. 90).

As part of the work of the Good Humanitarian Donorship Initiative a review was also commissioned of international humanitarian financing mechanisms, which covered the expanded CERF, the country-level pooled funding mechanisms—the Common Humanitarian Funds (CHF) and Emergency Response Funds (ERF). (Stoddard, 2008) Bilateral government funding to individual aid agencies for specific programmes was found to continue to represent by far the largest share of contributions—roughly 80%. The establishment of the

CERF and CHF has cut into this slightly and together these pooled funding mechanisms now represent 8% of the total. Government-to-government aid and private contributions have remained fairly stable at around 4% each.

The main points emerging from the study were as follows:

- The years since the start of the financial reforms have shown accelerated growth in humanitarian contributions;
- The increase in the growth rate of humanitarian funding is driven by the group of donors most engaged in the new financing mechanisms;
- Overall, donors have decreased the share of their contributions going directly to NGOs and Red Cross societies;
- Overall, pooled funding has not detracted from the core UN humanitarian agencies' direct bilateral support or core contributions;
- Funding relative to stated needs has risen slightly, and global actors have shown improved coverage of requirements;
- Humanitarian funding of early recovery activities in particular is increasing.

Box 5. Developments in relation to accountability in UNICEF and UNHCR during 2008

UNICEF

In the last quarter of 2007, UNICEF launched a series of improvement initiatives to achieve the strategic shifts recommended by an earlier Organisational Review. Included within these initiatives is an Accountability Initiative, which aims to clarify the understanding of accountability in UNICEF, outline the various components of a comprehensive accountability system and to identify and address gaps or areas that require strengthening. Work undertaken during 2008 involved consultations and desk-reviews of accountability-related documentation produced by the UN Secretariat and other agencies. UNICEF also participated in the *2008 Global Accountability Report* (see Section 1.3) in which, based on its capabilities, it was ranked third overall out of the thirty organisations assessed. The first draft of the *Report on the accountability system of UNICEF* was presented to the Executive Board in November 2008. The final version of the report is expected to be presented to the Executive Board during 2009, after which UNIVED will undertake a review of functions, roles and accountabilities at all levels of the organisation. The review is intended to produce a detailed description of accountabilities at country, regional and headquarters levels and will be complemented by a comprehensive assessment framework to measure progress made against the Accountability System. Source: UNICEF, 2009.

UNHCR

In 2007, UNHCR established an Accountability Framework for Age, Gender and Diversity Mainstreaming (UNHCR, 2007). The Framework established "minimum

standards of office practice to create an enabling organisational and operational environment conducive to achieving equitable outcomes for all persons of concern [to UNHCR]" (Groves, 2008). The Framework uses a check box format to be completed by Country Representatives, Regional Representatives and accountable staff at Headquarters in order to track progress towards four main equality objectives:

- Age, gender and diversity mainstreaming in operations;
- Enhanced protection of women and girls of concern to UNHCR;
- Enhance protection of children of concern to UNHCR, including adolescents;
- Enhanced response to and prevention of sexual and gender-based violence.

Remarkably, the framework does not provide for any input or 'voice' by any of the persons of concern, instead limiting itself to a self-assessment monitoring tool of compliance by UNHCR office to the policies and procedures of the organisation. During 2008 the first global analysis was undertaken of progress measured against the framework, which will serve as a baseline for future global analysis (Groves, 2008). It found that most actions (62%) were 'fully' complied with, 33% partially complied with and 5% not complied with.

The study did not look into the accountability issues raised by the increased use of pooled funding mechanisms.

1.4.3. Donor organisations

OECD Development Assistance Committee (DAC)¹⁹

Following the agreement on standardised coding of financial data on humanitarian funding across DAC members, 2008 will be the first year in which humanitarian aid contributions by DAC members will be directly comparable. This step is expected to significantly improve the accuracy and reliability of analyses and reports on humanitarian funding flows during 2009.

The DAC peer reviews are a central and unique OECD activity. The reviews monitor individual member countries' efforts and performance in the area of development co-operation. Each member is critically examined by representatives from two 'peers' (2 other DAC member countries) and the DAC Secretariat. The reviews take place approximately once every four years and, in this way, five programmes are generally examined each year.

¹⁹ DAC is a key forum of 23 bilateral donors (members of the OECD) working together to increase the effectiveness of their international development efforts.

During 2008 four countries were reviewed:

- Australia: peer reviewers Ireland and Portugal;
- France: peer reviewers Sweden and UK;
- Norway: peer reviewers Canada and the European Commission;
- Luxembourg: peer reviewers Finland and Spain.

The reports of the peer reviews are available on the OECD/DAC website.

Good Humanitarian Donorship initiative (GHD)

June 2008 marked the fifth anniversary of the adoption of “The Principles and Good Practice of Humanitarian Donorship” document by 17 donor organisations in Stockholm. Since then, GHD membership has grown to include all OECD-DAC members following endorsement at the ministerial level of the OECD-DAC in 2007 and, more recently, of all EU member states. In all, 35 humanitarian donors are committed to implementing or at least making progress in implementing the GHD principles and good practices.

The GHD annual meeting in New York in June 2008 considered two studies: “International Humanitarian Financing: Review and comparative assessment of instruments” (Stoddard 2008) and “Indirect Support Cost Study: Final Report” (Development Initiatives 2008). Also considered were notes on the relationship between GHD and the OECD/DAC, and the future of the GHD initiative.

The study of indirect support costs (ISC) by Development Initiatives is of significance to accountability, quality and participation because the level of ISC, and the effectiveness of how these resources are used by agencies, has a direct effect on many of the areas covered by the Benchmarks in the HAP 2007 Standard. For instance, agencies receiving comparatively low levels of indirect support costs will generally be less able to devote staff time to consultation with beneficiaries and affected populations and to learning activities than agencies receiving higher levels.

Among the findings of the study were that:

- there is considerable variation in terminology that humanitarian agencies use to describe their indirect support costs;
- a percentage rate does not provide a true picture of indirect costs;
- most NGOs have different cost structures, work to different national accounting standards and in different national legal frameworks, making it extremely difficult to achieve standard cost classifications for NGOs;
- organisations with core funding have different needs to recover indirect support costs, depending on the level of core funding. Since the relationship between core and non-core income differs across UN and Red Cross organisations, it does not make sense to talk about a standard support cost charge.

The following were among the recommendations:

Donors need to make it clear to humanitarian organisations that they understand that ISC rates are not comparable and they will not use the ISC rates as a major factor in assessing an organisation's performance or eligibility for funding. However, donors clearly need a system for assessing whether an ISC charge is reasonable so humanitarian organisations need to reciprocate by analysing their costs more explicitly and making the case for their indirect cost charges. (Development Initiatives, 2008, p. 23)

Donors should not apply pressure on UN and Red Cross Organisations to achieve one standard rate because this will penalise some and favour others. (Ibid, p. 24)

The note on the future of the GHD Initiative was considered and the consensus was that it should continue along similar lines to the first five years, though with some rationalisation of the various sub-groups and GHD-related initiatives. The option of creating a secretariat that would be able to provide greater continuity than has been possible with the annual rotation between two co-chairing organisations was deferred. Co-chairing that had been undertaken by the USA and Sweden during 2007-08 was transferred to the EC and Netherlands for 2008-2009.

The note on strengthening linkages between the GHD and the OECD/DAC had been prepared following a series of meetings between the GHD Co-Chairs and the DAC Secretariat. Among the proposals were:

- Champions among the DAC membership should be identified to encourage greater attention to be given to humanitarian assistance within the DAC;
- Improve the dialogue on humanitarian assistance in the DAC peer reviews and move more of the analysis of humanitarian assistance from the annex to the main body of the peer review;
- Identify common terminology on humanitarian assistance that can be used by both DAC and the GHD.

Box 6. Humanitarian Response Index 2008

The Humanitarian Response Index (HRI) 2008 is the second in this annual series by the Madrid-based Development Assistance Research Associates (DARA). The HRI represents an attempt by DARA and a network of researchers and analysts to use the GHD's Principles and Good Practice of Humanitarian Donorship as the framework by which to assess the performance of donors in responding to humanitarian needs around the world and how well they are meeting the standards of good practice that they committed themselves to.

The Index is built up from over 55 qualitative and quantitative indicators that aim to capture the essence of the GHD Principles. The indicators are grouped into five key areas or Pillars of good practice, which are used to score the different donors. The qualitative data was gathered from studies in 11 different crisis areas during which interviews were conducted with over 350 humanitarian organisations and donor agencies and more than 1,400 responses to a survey of donor practice. The quantitative data was compiled from a variety of data sources including the UN, ECHO, World Bank, IFRC and ICRC.

Publication of the first Humanitarian Response Index (HRI 2007) had met a broadly positive reaction from the humanitarian community but had produced a strong reaction from some donor organisations, which were irked by the inclusion of a ranking of donors based on the scores achieved in the Index. This resulted in an exchange of letters between the co-chairs of the DAC and DARA, in which DARA defended the methodology and the use of the ranking (correspondence published on the GHD website <http://www.goodhumanitarianandonorship.org/>).

HRI 2008 describes the "mixed reviews" from the donor community in the following terms: *The fact that the HRI was conceived as an independent initiative, not sponsored by donors, was met with some surprise as most of the initiatives in the sector have relied heavily on donor funding and support. Nevertheless, individuals within donor agencies have expressed encouragement and have privately told DARA that the HRI serves to stimulate debate within their own agencies. In fact, some donor agencies have begun to use the information derived from the HRI indicators, and the HRI has perhaps indirectly contributed to the process of refining and improving the GHD collective indicators. (p. 11)*

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In a paper on “The US as a humanitarian actor”, Larry Minear the highly respected researcher and analyst of the humanitarian system wrote: “my conclusion is that the five pillars against which the HRI assesses government performance are appropriate and that the HRI’s assessment is broadly confirmed by our own independent studies” (Minear, 2008).

HRI 2008 retains the ranking of donors by their relative Index scores and, taking account of feedback received on HRI 2007 and a series of technical workshops involving donors, NGOs, UN agencies, the Red Cross Red Crescent movement and technical experts, has made a number of improvements to the methodology, indicators and sample size used in compiling the Index. The donors ranked first, second and third in HRI 2007 (Sweden, Norway and Denmark respectively) remain the same in HRI 2008, as does the donor ranked last (Greece).

After two years the HRI is beginning to show areas where donors collectively can do more to uphold the GHD Principles, as well as specific areas where individual donors can improve in relation to their peers. The HRI 2008 findings show that there are great differences among donor, with the policies and practices of some donors more closely aligned to the GHD Principles than others. However, all countries—even the top ranked ones—have room for improvement. This is both a collective and individual responsibility. The HRI findings show that there is still too little consistency in the actions and behaviours of donors and the overall humanitarian system in different crisis situations. This underscores the need to work towards a more predictable, reliable and principled response to all crises. This is one of the underlying aims of the GHD Principles, which is, to a certain extent, shared by the UN humanitarian reform process and many of the quality and accountability initiatives of the sector. The HRI 2008 shows that this ideal is still far from reality.

Though the modifications made to the methodology used in HRI 2008 were noted, it is understood that DARA’s insistence on retaining the ranking of donors is seen by some members of the GHD as an obstacle to opening a more constructive dialogue. The ranking is apparently regarded by many GHD members as an “annual beauty contest” that runs counter to the ethos of collegiality and mutual support that has guided the development of the GHD. Some GHD members are also understood to question the methodology underlying some of the indicators used in the HRI. It remains to be seen how the relationship between the GHD group and DARA will evolve. Given the independence of its funding sources, DARA’s HRI is “not going to go away” and so some form of accommodation will have to be reached. At present, however, it is not possible to anticipate when and how this might evolve.

European Union/European Commission

On 18 December 2007, the Presidents of the Council of the EU, the European Parliament and the European Commission agreed a joint statement on humanitarian aid. The European Consensus on Humanitarian Aid represents the first comprehensive joint EU policy statement on humanitarian aid and sets out common objectives, common principles and good practices and a common framework to deliver EU humanitarian aid. The European Consensus aims to improve EU coordination of humanitarian aid and emphasises good donor practice. As well as committing EU donors to GHD principles and good practices, specific reference is also made to the NGO/Red Cross Code of Conduct, Sphere Project and the OECD/DAC Guidance on the evaluation of humanitarian aid.

Though representing a significant and welcome step for the EU members and the Commission (which together account for approximately half of international humanitarian assistance), the language relating to accountability in the European Consensus is somewhat underwhelming.

[A]s far as possible, a participative approach with local populations at the various stages of the assistance programmes, particularly in protracted crises, are all elements that the EU will consider carefully. ...Accountability to people assisted commits the aid provider to work within a framework of quality standards, principles, policies and guidelines and promotes training and capacity building activities, ensuring the involvement of those assisted. (EU, 2007, p. 15)

During the year, ECHO published two commissioned reports (an evaluation of ECHO's own actions and a review of a range of other donors and agencies experience) on the use of cash and vouchers as a means of transferring resources to vulnerable populations (Lor-Mehdiabadi and Adams, 2008). The two studies readily acknowledged the potential benefit of cash and vouchers to beneficiaries in giving them the ability to decide for themselves what their needs are and how to utilise the resources received. Within ECHO the number of projects using cash and vouchers increased from two projects in 2000 to over 45 projects in 2006.

The evaluation found that cash projects had been dominated by Cash for Work projects largely as a result of past legal interpretations by ECHO on the use of cash. In August 2007, a revised legal interpretation increased the range of resource transfer options open to ECHO's implementing partners and this is expected to allow more flexibility in the use of cash to address the needs of vulnerable households for whom work is not an option. The principal finding of the evaluation was that cash and vouchers projects had consistently achieved their objectives and no evidence was found of "erroneous decisions"

or negative impacts. Beneficiaries, implementing partners and ECHO's in-country experts had all expressed satisfaction with the use of cash and vouchers. The review of other donors found substantial agreement on the key advantages of cash and vouchers, namely:

- Strengthening LRRD²⁰, Disaster Risk Reduction and disaster preparedness;
- Promoting choice and dignity for beneficiaries often at reduced cost.

A number of organisations were found to have already adopted a “cash first” principle—meaning that the default option should be cash and only where cash is inappropriate should other solutions be found. The principal recommendation made to ECHO was that it considers increasing the resources allocated to cash and voucher projects in the future.

World Bank

In 2008, the World Bank Independent Evaluation Group published, as a Working Paper, the proceedings of a conference and an evaluators' roundtable held in November 2006 entitled “Disaster Risk Management: Taking Lessons from Evaluation” (World Bank, 2008). As part of the evaluators' discussion, a table of 51 evaluation lessons and recommendations generated by 14 diverse institutions (international financial institutions, bilateral donors, humanitarian organisations) presented during the conference was prepared. Of the 51 lessons and recommendations, the third most broadly supported (9 of the 14 institutions) was that:

Even in the difficult circumstances of a disaster response, beneficiary participation during the design and implementation stages is essential to success. (World Bank, 2008)

1.4.4. Cross Sector Networks

ALNAP

ALNAP's Seventh Review of Humanitarian Action was published in April 2008 (ALNAP, 2008b). Its main chapters focused on 'organisational change in the humanitarian sector', 'the quality and future scope of joint evaluations' and a 'synthesis of evaluations of the response to the 2005 Pakistan earthquake'. The latter concluded in the following terms:

20 LRRD: Linking Relief, Rehabilitation and Development.

The response to the Pakistan earthquake can be seen as a success, relatively speaking. This is the general picture shown in the evaluations, and is also at least partly supported by the views of the people affected. ... While there is still plenty of room for improvement, the humanitarian response system appears to be better prepared to meet the needs of affected populations today than in the past. For example, the improvements in agency surge capacity seen in Pakistan demonstrate that capacity is improving within the system. (Cosgrave and Herson, 2008, p. 214)

The June Biannual Meeting was held in Madrid under the theme 'News Media and Humanitarian Aid', whilst the December Biannual Meeting was held in Berlin and took as its theme 'Rethinking Impact Assessment'. Both themes included issues of accountability towards affected populations. One of the recommendations of the Madrid Biannual was to "Establish serving the needs of crisis-affected populations as a central common goal of both media and humanitarian agencies" (ALNAP, 2008c). A report on impact assessment will form a key chapter in ALNAP's Eighth Review of Humanitarian Action to be published in 2009.

ALNAP's five-year strategy provides for engagement with, and the provision of, support to regional humanitarian networks. The Madrid meeting outlined the thinking on the forms such support could take and gave profile to existing regional humanitarian networks and institutions including the Asian Disaster Reduction and Response Network (ADRRN), Office Africain pour le Développement et la Coopération (OFADEC) and the All India Disaster Mitigation Institute (AIDMI).

During 2008, under the rubric of its Humanitarian Performance Project, ALNAP also undertook a study on the feasibility of monitoring and reporting on the overall performance of the humanitarian system. The preliminary results were presented to the Madrid Biannual and a chapter on this subject will be included in the Eighth Review of Humanitarian Action to be published during 2009. Thinking within ALNAP evolved during the year and, by the end of 2008, plans were announced to undertake a 'State of the System' assessment during 2009 on a pilot basis. The report from the assessment is expected towards the end of 2009. Other strands of the Humanitarian Performance Project will see further work on consultation with beneficiaries and beneficiary voice during 2009 and an Interest Group on Humanitarian Performance Indicators will be formed in early 2009.

1.5 Accountability 'on the ground': the Cyclone Sidr and Cyclone Nargis response operations

Cyclone Sidr made landfall on the coastal zone of Bangladesh on 15 November 2007. It left an estimated 4,400 dead or missing, 55,000 injured and 2.3 million households affected (Todd et al., 2008). Just under 6 months later, Cyclone Nargis struck the Ayeyarwady Delta area of Myanmar on May 3rd and left 138,000 dead or missing and 2.4 million severely affected. The comparatively low death toll in Bangladesh is widely attributed to an improved forecasting and warning system, cyclone shelters and embankments (e.g. Todd et al., 2008, p. 1). The comparatively high death toll in Myanmar is generally attributed to a general lack of preparedness on the part of the government and communities in the Delta, though this may in turn be partially attributed to the rarity and severity of the event (Turner et al., 2008).

An important difference in terms of the response was that international agencies were able to operate in Bangladesh without significant hindrance, whereas the Government of Myanmar significantly restricted the number of agencies and international personnel able to enter the country. Such restrictions limited the number of international agencies and staff responding and, according to the Inter-Agency Real Time Evaluation (RTE): "it is safe to assume that this factor decreased coverage of affected areas and probably prolonged suffering in some communities." Moreover, due to the relatively small number of responders, several organisations (UN and NGOs) "had to take on a relatively wide variety of sectoral activities, going beyond the institutional technical expertise of agencies" (Turner et al., 2008, p. 6).

The Inter-Agency RTE team noted that the restrictions and delays for international staff to obtain visas and travel permits meant that most of the aid workers who did eventually enter the country were either staff of agencies already present in Myanmar or partnered with such agencies; this contributed to "a significantly higher level of professionalism overall amongst international staff in Myanmar [in comparison with the international response following the Indian Ocean Tsunami]". The team also noted a "tangible sense of self-discipline amongst international aid workers interviewed. These factors, along with the impressive efforts of national actors described above contributed to a situation where, in the words of one head of agency, 'aid workers have behaved like real humanitarians'." (Turner et al., 2008, p. 7)

A result of the larger number of agencies responding in Bangladesh was a degree of competition as agencies sought to work in the worst affected unions. According to the CARE-Bangladesh (CARE-B) evaluation,

This resulted in considerable fragmentation of working areas in some unions and upazilas. For example, in Sarankhola, twelve non-government organisations worked on WASH activities in Rayenda union and nine non-government organisations worked on WASH in Dakshinkhali (South Khali) union. CARE-B ended up working on WASH activities in parts of all four unions of Sarankhola. (Todd et al., 2008, p. 24)

Whilst CARE-B focussed its efforts on Barguna and Bagerhat districts, the Oxfam International response was spread across all four of the most severely affected districts: Bagerhat, Patuakhali, Barguna and Pirojpur, despite assisting less than 10% of the number of households assisted by the CARE-B programme. The Oxfam evaluation team questioned the spread across a “huge geographical area” and asked if concentration on a smaller area to achieve a greater impact would have been preferable to “a thin spread”.

From the (admittedly limited) materials available, it appears that more agencies were establishing complaint boxes (as the preferred channel through which complaints could be brought to the attention of humanitarian organisations) in Myanmar than in Bangladesh and that the systems for handling the complaints were better developed in Myanmar.

In Bangladesh, CARE-B established complaint boxes at the distribution centres for the first WFP food distributions. Over 3,000 complaints were received, but the CARE-B Response Programme’s Monitoring and Evaluation Unit was only able to investigate one-third of the complaints.

They found that there was some basis to the complaints, and about 30 percent of beneficiaries were not eligible for various reasons including partner NGOs selecting their own members rather than complying with the targeting criteria. The list of beneficiaries was adjusted for the next round, and the number of complaints reduced significantly. Some UP chairmen commented that this was the first time that they had seen an international organisation pay attention to complaints made by beneficiaries and take appropriate action. They added that this improved transparency and their confidence in working with CARE-B. (ibid, p. 29)

In line with HAP’s New Emergencies Policy (NEP)²¹, the HAP Secretariat and its members worked together to improve accountability in both the Bangladesh

21 For the full text of the Policy and the Protocol, see <http://www.hapinternational.org/projects/field/new-emergencies.aspx>

and Myanmar operations. A significant development in the Myanmar response was that HAP and Sphere jointly deployed staff and consultants.

Following Cyclone Sidr, HAP members involved in the response in Bangladesh requested support from the HAP Secretariat during an NEP call. In the first phase of the deployment, the HAP Roving Team guided six agencies (HAP members and/or their national partners) through quality and accountability self-assessments. Each assessment involved spending between 4-7 days at a programme site of the respective agency, accompanied by staff from their head office in Dhaka and from the programme site, collecting information from communities and staff through focus group discussions, semi-structured interviews and observation. In addition, another HAP member agency undertook an accountability self-assessment with remote support and guidance from the HAP team. Overall, the joint teams undertook more than 38 focus group discussions and over 37 semi-structured interviews with disaster-affected communities and staff, and have spoken in total with over 420 beneficiaries and non-beneficiaries. A joint confidential report was prepared for each of the six agencies and an inter-agency workshop was held in Dhaka at the end of March to:

- share learning from the field visits and other self-assessment activities;
- explore options to continue sharing findings and learning from self-assessments;
- discuss accountability action plans, including support for local partners' capacity to comply with the Principles of Accountability ;
- Identify further support from HAP.

Subsequent support included:

- Remote assistance on such areas as complaints handling, providing feedback on progress reports and supporting the development and implementation of action plans;
- A 3-day workshop on complaint-handling processes for representatives from 12 NGOs;
- An After Action Review (AAR) to assess the appropriateness and impact of HAP's role in terms of influencing field practice and humanitarian quality management systems. The AAR included visits to projects sites of those agencies that undertook self-assessments and a 2-day workshop for representatives of HAP member agencies, partner agencies, and Sidr-affected communities.

Following Cyclone Nargis in Myanmar, a series of NEP teleconferences were coordinated through the HAP Secretariat. By the end of June, several HAP members had deployed quality and accountability advisers to Myanmar. According to one of these advisers, "It was great, we were all there together

and it enabled us to be more creative and better coordinated” (Clare Smith personal communication 12/1/09).

As a part of the NEP discussions, it was agreed that HAP staff would be deployed in collaboration with Sphere consultants in order to enhance the understanding and improve practices of humanitarian accountability and quality management for both HAP member agencies and other international and national NGOs. The decision to collaborate proposed “going beyond conducting inter-agency trainings side by side ... [and to] explore new modalities to provide joint support in future interventions, to maximise the expertise and resources of the two initiatives” (HAP, 2008b). Hosting arrangements to the joint team were provided by Save the Children in Myanmar (SCIM); CWS Pakistan/Afghanistan provided financial support in 2008.

The deployment was undertaken in three phases:

- Phase 1 (July): assessment of agency needs and feasibility of different approaches
- Phase 2 (July-September): delivery of capacity building support on the implementation of the HAP 2007 Standard and the Sphere Minimum Standards, with a particular focus on complaint handling processes and prevention and investigation of allegations of sexual exploitation and abuse
- Phase 3 (January-June 2009): taking account of the lessons from the first two phases, an Inter-agency Quality and Accountability programme led by a single Co-ordinator.

The experience gained in Myanmar has proved valuable for both HAP and Sphere and each is keen to build on this. Whilst reflection and learning from the experience continues, it is apparent that further development of the joint deployment model is required to achieve a more integrated approach and better meet the various needs of agencies. Nevertheless, the New Emergencies Policy and the way it has developed in conjunction with Sphere represents a significant and constructive step for the operation in Myanmar and bodes well for future humanitarian operations. Intuitively, a supportive relationship with hard-pressed response teams is more likely to achieve the desired accountability outcomes in the field than any amount of ‘top-down’ admonishments from head offices. Moreover, the development of an integrated quality and accountability programme responds directly to questioning about the number of separate quality and accountability initiatives by donors and humanitarian agencies.

1.6. Reflections on Some Themes and Challenges

The process of reviewing the material for this chapter raised four particular issues:

- The challenge of accountability in operations with significant organisational interdependence;
- The benefits and opportunity costs of multiple approaches to accountability;
- The potential implications of country-level NGO accreditation and certification schemes;
- The need for more research;
- The need for an agreed framework for assessing 'progress' in relation to accountability and quality in the humanitarian system.

The challenge of accountability in operations with significant organisational interdependence

One of the principal characteristics of the humanitarian system is that agencies are, to a greater or lesser extent, reliant upon each other to achieve their overall objective. Implementing agencies are often dependent (in an upward sense) on other organisations to provide them with critical resources (funding, relief commodities, equipment) and they are also often dependent (in a sideways sense) upon each other to provide complementary services without which the effectiveness of their own intervention will be reduced (e.g. a nutrition intervention that is not complemented by shelter, water and sanitation and health interventions).

The fundamental challenge such vertical and lateral interdependence presents to efforts to improve accountability were revealed by several of the evaluations reviewed. For instance, the evaluation of NRC's general food distribution programme in northern Uganda described how complaint desks were set up after each food distribution, but the team:

[...] found that the value of these desks to some degree seems to have withered away. Complaints have been filed to WFP for years without any major action or recourse. The frustration or apathy of no response is showing amongst both IDPs and volunteers, questioning the use/seriousness of these desks. (Das and Nkutu, 2008. p. 27)

The Listening Project found that the use of local and indigenous NGOs as "partners" by donors and international NGOs has added many more 'middlemen' which people in recipient communities find confusing and distancing. In a number of countries, Listening Teams heard people "compare the delivery chain to a water bottle, out of which everyone along the way takes

a drink so that by the time the aid reaches the communities it was intended to help, there is very little water left.” (LP, 2008a, p. 7)

The ongoing humanitarian reform process may simultaneously improve accountability (by clarifying the responsibilities of individual agencies at the cluster level) and diffuse accountability (through the development of the pooled funding mechanisms of the CERF and the country-level Common Humanitarian Funds). The report by Transparency International on preventing corruption noted with some concern the shifting nature of upward accountability as a result of the humanitarian reform process and its greater use of ‘common’ or ‘pooled’ funds. Whilst a Performance and Accountability Framework is currently being developed for the CERF, there is good reason to be concerned that accountabilities between organisations within the humanitarian system are in the process of being further diffused and diluted and greater distance is being put between the resource providers and the beneficiaries of those resources. In a revealing comment, the team evaluating the CERF noted that:

As the majority of UN agencies work in partnership with government or non-governmental organisations, direct accountability to beneficiaries is often the responsibility of those agencies. (Barber et al., 2008, p. 89)

With good reason, efforts to improve accountability within the humanitarian system have been largely focussed upon the development of accountability systems within organisations. As a growing number of organisations improve their accountability systems (as a result of efforts by HAP and others), so there is a need to increase efforts to improve systems of accountability between organisations.

HAP is gaining valuable knowledge and experience of accountability in the relationship between international NGOs and their national or local implementing partners. Members such as Christian Aid and CAFOD respond to humanitarian needs with and through their implementing partners. The learning gained on accountability and partnership by HAP members as they undertake baseline analyses and work through the certification process will provide valuable insights into issues of accountability between organisations and is likely to place HAP in a leadership position on efforts to improve inter-organisational accountability.

The benefits and opportunity costs of multiple approaches to accountability

Section 1.4 noted some of the positive developments in terms of collaboration and improved inter-operability between HAP, Sphere and People In Aid. However, recent years have seen the development of a number of different accountability initiatives and their use (or at least advocacy for their use) within the humanitarian system. As well as the HAP 2007 Standard, which was specifically designed for use as a compliance verification tool for independent quality assurance and certification, there is the Global Accountability Framework developed by One World Trust, the Good Enough Guide on Accountability and Impact and the DEC's Accountability Framework. In addition, a number of national level NGO accreditation schemes have come into operation in the last year or two with implicit approaches to quality and accountability systems within agencies (see Section 1.4 and below).

The principal elements of the HAP 2007 Standard, the Global Accountability Framework, the Good Enough Guide on Accountability and Impact and the DEC's Accountability Framework are presented in Boxes 7, 8, 9 and 10.

Box 7. Benchmarks in the HAP 2007 Standard

Specific requirements and means of verification are included in the HAP 2007 Standard as an integral part of each of the six Benchmarks highlighted below. *The Guide to the HAP Standard* provides practical support on implementing the Benchmarks and advice on achieving good practice.

Benchmark 1: The agency shall establish a humanitarian quality management system.

Benchmark 2: The agency shall make the following information publicly available to intended beneficiaries, disaster-affected communities, agency staff and other specified stakeholders: (a) organisational background; (b) humanitarian accountability framework; (c) humanitarian plan; (d) progress reports; and (e) complaints handling procedures.

Benchmark 3: The agency shall enable beneficiaries and their representatives to participate in programme decisions and seek their informed consent.

Benchmark 4: The agency shall determine the competencies, attitudes and development needs of staff required to implement its humanitarian quality management system.

Benchmark 5: The agency shall establish and implement complaints-handling procedures that are effective, accessible and safe for intended beneficiaries, disaster-affected communities, agency staff, humanitarian partners and other specified bodies.

Benchmark 6: The agency shall establish a process of continual improvement for its humanitarian accountability framework and humanitarian quality management system.

Source: HAP, 2008a.

Box 8. The four dimensions of accountability used in the Global Accountability Report

Transparency capabilities are assessed by analysing:

1. Whether organisations make a commitment to transparency and have in place a policy or other document(s), underpinned by principles of good practice, that guides what, when and how information is disclosed;
2. Whether organisations have in place systems to ensure compliance with the policy and commitments.

Participation capabilities are divided into two components, with scoring split equally between them: equitable members control and external stakeholder engagement capabilities.

Equitable member control is assessed by analysing how organisational structures support or undermine members' ability to influence decision making (member states in the case of IGOs; national chapter/affiliates in the case of NGOs and shareholders/owners in the case of TNCs).

External stakeholder engagement capabilities are assessed by analysing:

1. Whether organisations make a commitment to engage external stakeholders in activities and decision making and have in place organisational document(s), underpinned by good practice that guide this process.
2. Whether organisations have in place systems to ensure compliance with these policies and commitments, and whether they have created institutionalised spaces where external stakeholders can feed into decision making at the governing, executive and/or senior management levels.

Evaluation capabilities are assessed by analysing:

1. Whether an organisation makes a commitment to evaluate and has in place policy(ies), underpinned by good practice principles, which guide evaluation practice;
2. Whether an organisation has in place management and systems to ensure both compliance with these commitments and the dissemination of lessons learned.

For the corporate sector, the focus in the evaluation dimension is split evenly between environmental and social impact (e.g. labour standards in the supply chain, community relations). The scoring for each of these areas is then divided equally between policies and systems.

Complaints and response handling capabilities are divided into two components: capabilities for handling internal complaints from staff and capabilities for handling external complaints from affected communities and the general public. Scoring is split equally between them. In both instances, capabilities are assessed by analysing:

1. Whether organisations make a commitment to handling complaints and have in place written documents, underpinned by good practice principles that guide their practices in the area.
2. Whether organisations have the systems in place to ensure these commitments are turned into practice.

In both instances, assessed complaints procedures are in relation to compliance with organisational policies (e.g. codes of ethics, environmental policies, information disclosure policies, etc.)

Source: Blagescu et al., 2005.

Box 9. Good Enough Guide: Basic elements of accountability and impact

Basic elements of accountability

At a minimum, humanitarian project staff should:

1. Provide public information to beneficiaries and other stakeholders on their organisation, its plans, and relief assistance entitlements.
2. Conduct ongoing consultation with those assisted. This should occur as soon as possible at the beginning of a humanitarian relief operation, and continue regularly throughout it. 'Consultation' means exchange of information and views between the agency and the beneficiaries of its work. The exchange will be about:
 - The needs and aspirations of beneficiaries;
 - The project plans of the agency;
 - The entitlements of beneficiaries;
 - Feedback and reactions from beneficiaries to the agency on its plans and expected results.
3. Establish systematic feedback mechanisms that enable:
 - Agencies to report to beneficiaries on project progress and evolution;
 - Beneficiaries to explain to agencies whether projects are meeting their needs;
 - Beneficiaries to explain to agencies the difference the project has made to their lives.
4. Respond, adapt, and evolve in response to feedback received, and explain to all stakeholders the changes made and/or why change was not possible.

Basic elements of impact measurement

Impact measurement means measuring the changes in people's lives (outcomes) that result from a humanitarian project, striking a balance between qualitative and quantitative data. At a minimum, humanitarian project staff should:

1. Establish a basic description (profile) of affected people and related communities.
2. Identify desired changes, in negotiation with affected people, as soon as possible.
3. Track all project inputs and outputs against desired change.
4. Collect and document individual and community perspectives through participatory methods in order to:
 - Increase understanding of what change they desire;
 - Help establish a baseline and track change.
5. Explain methodology and limitations to all stakeholders, honestly, transparently, and objectively.
6. Use the information gathered to improve projects regularly and proactively.

Source: The Good Enough Guide, 2007.

Box 10. The DEC Accountability Framework	
Accountability Priority	Definition
We run well managed appeals	<ul style="list-style-type: none"> • Efficient and effective fundraising • Timely and appropriate allocation • Review of performance • Accountability to stakeholders
We use funds as stated	Ensuring sound financial management at agency and partner levels
We achieve intended programme objectives and outcomes	Maximising the potential for programmes to achieve objectives and outcomes which respond to a demonstrated need
We are committed to agreed humanitarian principles, standards and behaviours	Fulfilling the principles embodied in the Red Cross Code of Conduct, Sphere, People in Aid ²²
We are accountable to beneficiaries	Taking account of, giving an account to and being held to account by disaster survivors
We learn from our experience	Improving performance based on lessons learnt

Comparison of the four approaches/frameworks reveals a significant degree of commonality between them—transparency, participation, complaints handling and learning are all present in the different elements, though they are presented and treated somewhat differently in each. Given the significant commonality, there is a risk that the differences between them may not be fully understood and give rise to the perception that they represent approaches that are somehow interchangeable. Hypothetically for instance, an agency receiving a high score in a Global Accountability Report may use that result to project itself as an ‘accountable agency’ in its fundraising efforts, whilst at the same time opting not to become a member of HAP and undertake the HAP certification process because that would be a more ‘demanding’ process for the agency. Unless public and private donors are fully aware of the different merits and requirements of the Global Accountability Report and the HAP Standard and certification process, for example, they may feel that the agency meets high standards of quality and accountability in all its programmes—a fact which cannot be assured in the absence of quality and accountability assessments at the programme level and the more rigorous assessments and procedures involved in obtaining HAP certification.

²² Certification with the HAP Standard was included in earlier versions of the Accountability Framework but it is not mentioned in the current version dated July 2008. (<http://www.dec.org.uk/download/560/An-Introduction-to-the-New-DEC-Accountability-Framework.pdf>)

Despite the significant degree of commonality between the four approaches/frameworks, it is important to recognise the differences between them and what they each represent. The ECB Good Enough Guide is probably best viewed as a capacity building tool for the staff of ECB member agencies and others that may find it useful. The Good Enough Guide is a full part of *The Guide to the HAP Standard*. The Global Accountability Report represents a rating assessment by a think-tank (the One World Trust), against indicators developed by that third party which itself lies outside the humanitarian system. The DEC Accountability Framework is a tool that relies primarily on self-assessment that has been developed by a UK fundraising, membership organisation to enable the Board of that organisation to assure the public that the funds raised through appeals will be used effectively and accountably. HAP is a formalised partnership of agencies within the humanitarian system that have voluntarily stated a commitment to improve quality and accountability through standard-setting, compliance verification and certification based on verifiable indicators and external assessment.

To avoid the potential for confusion between the different approaches and frameworks, it would be desirable for the four organisations concerned to agree on a common statement as to what their respective frameworks and approaches offer and say, as well as what they do not offer and cannot say, about an organisation's accountability and quality management systems. In addition, it should be incumbent on all agencies to ensure that their donors (public and private), their partners and the communities that they work to serve are aware of such differences, particularly when making claims in relation to their use. It is in the longer-term interests of the humanitarian system that differences between potentially confusing and competing approaches are managed as transparently and collaboratively as possible.

The potential implications of country-level NGO accreditation schemes

Section 1.4 described the development over the past 2-3 years of NGO accreditation schemes in Pakistan, India, Cambodia and Palestine, as well as the travails experienced by the Philippine Council for NGO Certification established over ten years ago. The development of such schemes is to be welcomed as it signals concerted and broadly based efforts to improve the accountability and quality management systems of NGOs operating within these countries. From the material examined, it is unclear to what extent the schemes are focussed upon national NGOs and the extent to which international NGOs will be affected by the development and spread of country-level certification schemes. Whatever the details of the different national schemes, it is quite conceivable that, within the next few years, the respective country programmes of international NGOs working in the humanitarian and development fields will be required to participate in such schemes.

This raises a number of questions including: the degree of commonality between the methods and approaches employed by such schemes; the degree to which national schemes are able to recognise and take account of international certification and accreditation schemes such as HAP's.

HAP's current thinking is of encouraging a decentralised accreditation system in collaboration with suitable NGO networks and associations. This approach envisages HAP accrediting national, regional and international NGO networks with the competence and authority to certify their members or affiliates as being compliant with the HAP Standard. If taken up by national bodies, such an approach offers a means of achieving greater commonality. However, this will require a degree of 'retrofitting' and may not address all the functions of the systems already put in place in a number of countries. In such cases, agreement would be needed between HAP and the national bodies as to which aspects of their requirements would be shared in common with HAP and which requirements would still be required to be met for NGOs to achieve certification at the national level. To provide a framework for such discussions, some form of 'international association of NGO accreditation bodies' may be required.²³

The need for more research

Section 1.3 summarised the results of a HAP member's analysis of the financial benefits resulting from improved accountability to intended beneficiaries and local communities. Such analyses remain rare however and more evidence is required from agencies working in different contexts in order to convincingly demonstrate a clear 'business case' for improved accountability to intended beneficiaries and local communities, i.e. that the investment required by an agency to improve its accountability to intended beneficiaries and local communities is more than justified by the financial and other benefits that will accrue to the agency as a result of making those investments. The type of research required to provide robust evidence would most likely involve months of fieldwork in a number of different locations. This is only likely to be achieved by encouraging PhD or similar research students to focus on this area of work. Such encouragement could be provided by HAP members or by HAP itself forging links with relevant universities or collaborative efforts by groups of universities.²⁴ In the UK, for example, higher education research councils are

²³ In 2008, HAP started preliminary work on developing an Accreditation Standard.

²⁴ In the HAP Medium Term Strategic Plan 2007-2008, "The aim is for HAP to increase the credibility of its research through the inclusion of other research organisations, but without losing control over the nature of the research. Fulfilling the need to bring legitimacy to the research programme will be achieved progressively by the increased participation of external bodies in one or more of the phases of a research programme (design, data gathering or analysis)". For more details, see Chapter 5.

funding a programme of Enhancing Learning and Research for Humanitarian Assistance (ELHRA) during 2009-2010. Research into the costs and benefits of improved accountability to intended beneficiaries and local communities would appear eminently suitable for such mechanisms.

In a similar vein, it would also be of considerable interest and benefit to HAP members and humanitarian agencies generally for research to be undertaken that compares the performance of those agencies that have achieved HAP certification and those that have so far not become members of HAP and/or commenced the certification process. In preparing this Chapter, a watching brief was maintained for any evidence that might shed light on such issues. None of the evaluations reviewed were of programmes undertaken by HAP certified agencies. Several evaluations focussed on or covered programmes undertaken by HAP members, some of which have yet to begin the certification process. Such evaluations contained examples of 'bad' as well as 'good' practice. It is not possible to make any inferences on the basis of the material reviewed. However, such questions are important and would justify efforts to improve the understanding of performance differences that could be attributable to systems required in order to attain HAP certification. Generating robust evidence on such issues would require high quality research across several agencies and locations and once again this points to the need for improved linkage with university-based researchers.

The need for an agreed framework for assessing 'progress' in relation to accountability and quality in the humanitarian system

This chapter has drawn together information and material from a wide range of sources across the humanitarian system and this will have helped convey the remarkable breadth of what is relevant or potentially relevant to an assessment of developments in relation to accountability in the humanitarian system. Assessing the relative significance of the many developments in a way that is systematic and objective has proven a considerable challenge. It is apparent that a clearer framework for making such assessments in future Humanitarian Accountability Reports is desirable.

Categorising developments in terms of the extent to which they may be regarded as 'positive' or 'negative' may be one way of framing such assessments. A crude example of such an approach is provided in Box 11.

Box 11. Possible categories for assessing ‘progress’ in relation to accountability and quality in the humanitarian system

Category	Reference Score
Developments having a direct, positive effect on accountability and quality	+3
Developments having an indirect, positive effect on accountability and quality	+2
Developments of relevance to accountability and quality and capable of having a positive effect	+1
Developments of potential relevance to accountability and quality and capable of having a negative effect	-1
Developments having an indirect, negative effect on accountability and quality	-2
Developments having a direct, negative effect on accountability and quality	-3

Another approach may be to compare practices in the year under review with practices from five years earlier. These and other approaches and methods will be explored during 2009 with the objective of having a framework in place to support the overview and assessment in the 2010 Humanitarian Accountability Report.

1.7. A Concluding Assessment

On the basis of the materials reviewed above, the overall impression gained is of a widening and deepening of accountability within the humanitarian system during 2008. The growth in HAP membership and the number of agencies enrolled in the certification scheme; the increased use of complaints handling systems in operations; the development of accountability frameworks within humanitarian agencies; the spread of country-level NGO accreditation schemes; the joint deployment by HAP and Sphere in Myanmar; the SCHR Peer Review; publication of the second Humanitarian Response Index; the publication of the Listening Project’s Issues Papers are just some of the notable developments during the year. The sense is of accountability to intended beneficiaries and local communities becoming increasingly, if tentatively and somewhat patchily, integrated within the operational approach of a growing number of agencies.

Whilst some of the developments would have occurred in the absence of HAP, it is interesting to see how many ways in which HAP and its members

are contributing to these developments. By championing accountability, by providing a comprehensive and rigorous method for improving accountability and by supporting accountability efforts in ongoing operations, and by demonstrating the applicability and value of the Standard and the certification scheme to a wide range of international and national agencies, HAP is playing a central role in carrying the accountability agenda forward.

Despite the many positive developments, the review has also shown the scale of the challenge. The tenacity of sexual abuse and exploitation in the humanitarian aid system, due in large part to the massive underreporting²⁵ by those affected is clear. Also apparent are: significant weaknesses and shortcomings in evaluation, for long the principal component of the humanitarian system's approach to accountability; the potential for the diffusion and dilution of accountability as a result of the new financing arrangements introduced as part of the Humanitarian Reform Process; a deep seated reluctance by organisations, professions and individuals to view beneficiaries as being at the core of accountability; and the emergence of different accountability frameworks and approaches with the potential for creating confusion and competition. These are all area and issues for concern.

And yet the sense of progress in many areas during 2008 is encouraging and essentially a cause for optimism that the humanitarian system is moving in the right direction towards HAP's vision of a humanitarian system championing the rights and the dignity of disaster survivors.

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²⁵ Generated by factors discussed in Section 1.3 above.

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