

Common Humanitarian Accountability Framework for IWG Agencies

**Inter Agency Working Group:
Emergency Capacity Building Project
(ECB2)**

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Common Humanitarian Accountability Framework for IWG Agencies

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Abbreviations

AF:	Accountability Framework
AIM:	Accountability and Impact Measurement
CEO:	Chief Executive Officer
CO:	Country Office
CRS:	Catholic Relief Services
DME:	Design, Monitoring & Evaluation
GAP:	Global Accountability Partnership
GB:	Great Britain
GEG:	Good Enough Guide
HA:	Humanitarian Accountability
HAP:	Humanitarian Accountability Partnership
HQ:	Headquarters
HR:	Human Resources
INGO:	International Non-Governmental Organisation
ISO:	International Standards Organisation
IWG:	Inter-Agency Working Group
MACO:	Management Assessment of Country Offices
M&E:	Monitoring & Evaluation
MOS:	Maximising Operating Standards
PVO:	Private Voluntary Organisations
Q&A:	Quality and Accountability
QMS:	Quality Management System
RCRC:	Red Cross and Red Crescent
Save:	Save the Children – US
SCHR:	Steering Committee on Humanitarian Reforms
TEC:	Tsunami Evaluation Coalition
WVI:	World Vision International

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Executive Summary

Several international initiatives have been launched in the past few years for developing quality and accountability standards in the humanitarian agencies. The ECB Project commissioned a consultancy to develop a common Accountability Framework in order to help members meet the increasingly strident calls for demonstrating accountability in their humanitarian operations. This report analyses the current understanding and practices within the member agencies in humanitarian accountability and examines how the agencies can take on board various existing international standards.

The Framework proposed here attempts to bring key elements of the established standards like Sphere, HAP 2007 standard, One World Trust Accountability Framework, ISO 9000, etc., together in a way that enables the ECB members to translate the core elements of these standards into practical actions. By using this framework, agencies will develop a common language and be able to clearly articulate the key elements of various international accountability standards they are using in their humanitarian programmes.

The Key Principles:

The following key principles were identified from amongst the various international standards which the ECB agencies need to focus on in terms of developing credible internal capacity and systems:

1. Leadership
2. Planning, Monitoring & Project Design
3. Non-Discrimination and Needs-based Response
4. Participation
5. Transparency
6. Beneficiary Feedback & Complaints Mechanism
7. Evaluation and Learning
8. Staff Competence and HR Management.

The Framework captures a practical definition of these principles and identifies indicators that the ECB agencies need to measure against in order to realise their commitments to accountability.

Recommendations:

R1: Having an internal mechanism for regular and systematic audit, self-review and evaluations is a ***minimum essential first-step*** towards an agency's humanitarian accountability obligations. A few of the ECB agencies will need to take this first step.

R2: 2 levels of Compliance to the Accountability commitments are recommended:

Level 1 (first step):

Agencies to put in place systematic mechanisms for periodic self-audit review, internal peer review and external evaluations of their overall humanitarian programmes on compliance to the Quality standards, and the outcome of such processes need to be

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periodically reviewed by the highest level of leadership within the organisations and agencies **must** make the findings of such reviews/audits/evaluations publicly available in appropriate format to its stakeholders, especially to beneficiaries and local constituents.

Level 2:

Option 1: ECB Peer Review:

ECB conducts peer review every 3 years against the 8 accountability principles outlined in this framework. Although ECB peer review need not necessarily lead to certification, a systematic and rigorous process of review and transparent communication with external stakeholders and peers on the outcome of the review could have the same validity and credibility in terms of accountability to stakeholders as any external certification.

Option 2: External Certification:

HAP2007 Standards or ISO 9000 Certification or similar international standards compliance. All external certification involve a pre-certification self-assessment followed by an external audit by the certification/accredited agency for the particular standard.

- R3: The discussions and debates on this draft framework within the ECB agencies need to take place at country level within each agency as well as at the level of the senior-most leadership of IWG to work out an inter-agency mechanism for rolling out the framework.
- R4: Of the eight principles defined in the framework, the *absolute minimum* for initiating implementation of the framework are the principles 1, 5 and 6, (i.e., **leadership on accountability, beneficiary feedback & complaints mechanism and transparency**) and it is in these areas that the collective leadership of IWG needs to drive the Accountability agenda in the initial stages.
- R5: In large agencies with multi-country programmes, the implementation of the framework may be phased over a 3-5 year time-frame in order to allow scaling up of management capacity and organisational learning and adaptation to take place. However, the critical element under any circumstances has to be that the senior leadership keeps an oversight of the roll out process and provides an overall steer through an organisation-wide implementation plan, rather than leave the implementation to the predilections and choices of individual country managers.
- R6: Several of the IWG agencies are federations of independent organisations like CARE, World Vision, Save the Children etc., and implementation of a common accountability framework globally may be a complicated process. Hence it is recommended that implementation is phased, starting with 2-3 countries, and gradually scaling up to include all countries with major humanitarian programme.
- R7: ECB needs to clarify in its internal and external communication that this Framework is not a new set of standards (like HAP, Sphere or ISO etc), but incorporates various elements of these already-existing standards. Individual agencies may, when they are ready, opt for certification under any of the external standards.
- R8: ECB to develop detailed implementation plan for peer review process for the next 3 years.

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- R9: Individual agencies need to have a focal point or champion on Quality and Accountability (Q & A) at the senior management level whose job would be to ensure that the action plans on Q & A are integrated and monitored at all levels.
- R10: Generally, the field staff are unaware of the work done through ECB forum, and except for the Good Enough Guide in some countries, staff have not fully engaged in the ECB initiatives. Appropriate dissemination and consultation process needs to precede any step towards implementation of this framework.
- R11: Agencies need to review their existing self-review/audit mechanisms (like MOS in Save, MACO in CARE) and integrate elements of the humanitarian accountability framework into these.
- R12: Individual agencies need to decide if and when they are ready for peer review and / or external certification.

Part I:

Humanitarian Accountability in the ECB Agencies

(This part provides an introduction to the Accountability and Quality debates within the humanitarian sector and examines the state of affairs within the ECB agencies. In the final section of this part, attempt is made to summarise the key issues and principles for ECB agencies in terms of developing and implementing a credible accountability framework).

Section 1: ECB Accountability Framework Development - Introduction and Methodology:

1.1 Background:

Over the past two years, debates and discussions among member agencies of the Emergency Capacity Building (ECB) project have noted that all the agencies use various elements of some of the internationally accepted accountability frameworks in their humanitarian work. However, there is no common understanding of what constitutes a good accountability framework and how compliance is ensured. An ECB learning event in December 2006 concluded that agencies need to focus on promoting a culture of accountability to disaster-affected populations within various levels of their agencies, and resource this accordingly. It was agreed that developing a common understanding will help the ECB members in greater facilitation of inter-agency learning and promotion of good practices, and in developing a common framework to demonstrate their accountability to key stakeholders in the face of mounting pressure on the humanitarian agencies globally to be more accountable in their humanitarian actions.

ECB commissioned a consultancy to help develop a common Accountability Framework. Two consultants were hired who carried out field work and research during the months of May and June. This report is the outcome of their work. The findings presented here are based on an analysis of the current understanding within the Inter-Agency Working Group (IWG)/ECB members of various international humanitarian principles and standards, and an analysis of current commitments and practices within these agencies.

1.2 Objectives:

The objectives of the consultancy as stated in the Terms of Reference (ToR, Annex 1) were as follows:

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- a) Produce a common humanitarian accountability framework, highlighting those benchmarks that should be used in a future peer review that focuses on humanitarian accountability;
- b) Provide guidance on how agencies could appropriately contextualise this common framework to more directly address their individual missions, mandates and principles.
- c) Make recommendations on how best to support other relevant interagency activities and maximise learning during subsequent peer reviews using this accountability framework as a point of reference (i.e. whether within ECB, joint accountability network review or SCHR peer review).

1.3 Methodology:

The methods employed by the consultants in gathering and assessing information were the following:

- Detailed briefing from ECB 2 Advisers to understand the ongoing debates within the member agencies on accountability and quality issues. An inception report (Annex 2) was produced in the early stages of the consultancy following the briefings and initial desk research which provided the overall structure for the field work and headquarters (HQ) interviews;
- Desk research: study of all key documents related to quality and accountability made available by five specific agencies namely, World Vision International (WVI), CARE, Save the Children (Save), Catholic Relief Services (CRS) and Mercy Corps, as well as documents provided by ECB. A list of all key documents studied is provided in Annex 3.
- Brief field visits¹ to Bolivia, Malawi and Uganda to discuss with field staff and visit the ongoing work of IWG agencies WVI, CARE, Save and CRS.
- Telephone interviews with 25 key HQ staff (WVI 5; CARE 8; Save 3; Mercy Corps 3; CRS 2; Oxfam GB 2) of six ECB agencies. A full list of all interviewees in the HQ and the field is provided in Annex 4.
- Triangulation of information gathered from the field visits by comparing the findings with telephone interviews, and comparing statements made by interviewees with reports and published information.

During the field work, the initial questions which were outlined in the inception report were further elaborated and refined in order to capture the diverse understanding of

¹ The purpose of the field work was to gain an understanding of various humanitarian standards and mechanism/principles of humanitarian accountability followed by the country office in running a major humanitarian programme as well as their views on where the main gaps are. The exercise was designed to “take-stock” rather than evaluate implementation of standards.

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various humanitarian accountability principles and practices². A selection of key principles/concepts were made from various existing international standards which were generally mentioned by majority of interlocutors as important to their work. A brief overview of various major international standards/principles is given in Annex 5. A list of generic principles/concepts drawn from these standards and corresponding definitions became the ‘rows’ of the interview matrix (Annex 6) that guided the fieldwork. Amongst the dozen or so well known principles and accountability standards used in varying degrees by humanitarian organisations, the following four standards were considered most important³ (more frequently mentioned in the interviews and also better understood):

1. Sphere Standards
2. Global Accountability Partnership Standards (GAP Standards)
3. HAP 2007 Standards
4. ISO 9000 series.

1.4 Definitions and Scope:

1.4.1 Accountability to Beneficiaries

In any discussion on accountability, the question as to who one is accountable to whom is of critical essence. All humanitarian agencies have multiple stakeholders and a complex array of accountability relationships. In this document, emphasis has been placed on accountability to beneficiaries and local constituencies (government, communities, etc). A detailed explanation on the rationale for this emphasis and key definitions is provided in Annex 8.

In brief, the reason for emphasis on beneficiaries is that current accountability practices are skewed towards the most powerful stakeholders, namely the governments and institutional donors. When it comes to the communities (beneficiaries) for which the humanitarian programmes are meant, the accountability relationships are the weakest. INGOs do not behave as if they were answerable to the communities they work with. The result is that the legitimacy and accountability of INGOs become disconnected; legitimacy is based on speaking for disadvantaged people, but INGOs focus on being accountable to donors⁴. Although INGOs’ accountability to their beneficiaries is a critical element of both Red Cross Red Crescent (RCRC) Code of conduct and Sphere standards which all the IWG agencies have signed up to, the degree to which INGOs are

² As each humanitarian accountability (HA) initiative has its own entry point and focus, ‘definitions’ of these principles and concepts vary. For example, ECB2 speaks of participation as *information exchange*, while others envision it as control of resources vested in the local actors (TEC for instance) or participation in programme decision and informed consent (HAP-I).

³ A fifth standard that was also mentioned was the People in Aid Code. However, as this relates specifically to agency staff, it has not been specifically examined in this report, although some elements of the People in Aid code form part of HAP standards and Sphere Common Standards.

⁴ Pathways to Accountability – The GAP Framework, Monica Blagescu, Lucy de Las Casas and Robert Lloyd, One World Trust, 2005.

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accountable to their beneficiaries and the quality of the mechanisms they use to ensure accountability lack consistency in application and practice.

1.4.2 Humanitarian Accountability

Although the findings, discussions and recommendations in this report refer specifically to humanitarian (emergency) programmes, all of these may be applicable to ‘development’ programmes as well. Individual agencies may choose whether they use separate accountability frameworks for all their programmes or have one single accountability framework which covers both development and emergency programmes.

1.4.3 Humanitarian Accountability Framework

Accountability framework is about *standards of quality* for which the agency is *accountable* to its stakeholders. An Accountability Framework is a statement containing a set of definitions, procedures, and standards that specify how an agency will ensure accountability to its stakeholders. It has three elements⁵:

- A statement of the commitments made – commitments may include external standards, codes, principles, and guidelines, in addition to internal values, mandate, principles, charter and guidelines.
- A baseline or an analysis of the current status of the organisation’s accountability framework. Indicators can then be drafted that capture where the organisation wants to go within a specified time frame.
- An action or implementation policy, strategy or plan - is an outline of how the above needs are planned into the organisation’s management approach and activities.

In this document, quality and accountability are treated as inseparable. The most critical element of an Accountability Framework is that it includes performance benchmarks and verifiable compliance indicators.

⁵ HAP-I Implementation Manual

Section 2: An Overview of Current Accountability and Quality Practices in the IWG Agencies

The ECB2 definition of accountability⁶ includes accountability to all stakeholders. In this study, the focus has been on accountability to beneficiaries. The other stakeholder group focused on in this study is agency staff members themselves. Rationale for inclusion of this stakeholder group is that agencies can not expect staff members to promote beneficiary accountability if the staff members cannot in turn hold the agency accountable.

Overall it was noted that the agencies are getting better at developing systems of participation and decision making which foster greater openness, transparency and accountability of various organisational processes to internal stakeholders, including supporters. Some of the agencies have made significant progress in putting accountability to beneficiaries on the institutional agenda and have initiated steps towards introducing international standards like HAP Standard, systematic Sphere compliance, etc. A detailed note on the current practices on accountability and standards in the organisations which were studied during the field work is appended as Annex 7.

An underlying assumption in the development of systems and tools to better address beneficiary accountability in emergencies is that agencies do not already have them in place. In all the three countries visited during the fieldwork, IWG agencies implemented their response activities in areas where they already had established presence through long-term development projects. As such, all agencies had some instruments (i.e. policies, guidelines and tools) to promote some degree of beneficiary accountability – at least in development projects⁷. However, there were three key challenge noted:

- (1) there is such a proliferation of manuals, procedures, standards and principles that staff gets confused as to what constitutes quality and mandatory requirements;
- (2) there is inconsistent application of what are generally considered good standards; and
- (3) there is no price/consequence to be paid by an individual or the organisation for poor quality at the level of beneficiaries as long as donors are kept happy.

2.1 Identifying and defining the Key elements of the Framework:

As noted in Annex 7, ECB members currently use various tools, standards and principles, some internal, and some in accordance with different internationally recognised instruments like the Sphere standard, Do No Harm principles, RCRC code, People in Aid Code, InterAction PVO standards, HAP-I Principles and Standards, etc. In the initial

⁶ “...the process through which an organisation makes a commitment to balance the needs of stakeholders in its decision making processes and activities, and delivers against this commitment.”

⁷ The ‘quality’ and/or effectiveness of these different implementation practices vary, but it is outside the scope of this consultancy to evaluate these practices.

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phase of the research (field visits, interviews and document research), the generic principles/concepts embedded within the major humanitarian accountability initiatives which are used by the field staff were identified as follows⁸:

- * Principle of non-discrimination and response based on needs alone
- * Participation
- * Transparency
- * Evaluation and Learning
- * Beneficiary Feedback and complaints mechanism
- * Staff Competence & HR in emergencies
- * Project Design (performance indicators for outcome and impact)
- * Leadership
- * Coordination

Most of the above are in line with some of the major international standards like HAP, ISO, Sphere, GAP etc., as the following table indicates. The entries in the table have been shaded in different colours to show the similarities in different Principles/concepts – similar colour denote overlap either in the entire principle or in terms of indicators/requirements embedded in a principle⁹. It is important to note here the following points with regard to the table:

- Three of the above concepts, namely, principle of non-discrimination, project design and coordination do not appear in any of the international standards explicitly, but non-discrimination principle is part of HAP Principles as well as embedded in Humanitarian Charter, in addition to it being the second principle in the RCRC Code of conduct.
- Project design does not figure in any of the international standards directly and is subsumed in the concept of quality and management systems.
- Coordination, though always problematic in all major humanitarian response, also does not find a specific mention in any of the international standards as opinion remains divided on whether it is realistic to lay down any standards on this dimension. Only the Sphere common standards 2 and 3 require agencies to coordinate assessments and response with other actors.

Table 1: Key Principles/benchmarks in Different International Standards:

GAP Framework	HAP2007 Standard	ISO 9001	Sphere
<i>Principles:</i> 1. Participation 2. Transparency 3. Complaints	<i>Benchmarks:</i> 1. Humanitarian Quality Management System	<i>Principles:</i> 1. Customer focus 2. Leadership 3. Involvement of	<i>Common Standards:</i> 1. Participation 2. Initial Assessment 3. Response

⁸ Based on the field visits and interviews with the agency HQ staff and study of the documents made available during this research.

⁹ More details in Annex 5

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<p>4. Evaluation</p>	<p>2. Information made publicly available</p> <p>3. Participation & informed consent.</p> <p>4. Staff competencies and performance development</p> <p>5. Complaints handling mechanism</p> <p>6. Continual improvement</p>	<p>people</p> <p>4. Process approach</p> <p>5. System approach to management</p> <p>6. Continual improvement</p> <p>7. Factual approach to decision making</p> <p>8. Mutually beneficial supplier relationships.</p>	<p>4. Targeting</p> <p>5. Monitoring</p> <p>6. Evaluation</p> <p>7. Staff Competencies</p> <p>8. Supervision/Management</p>
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Based on an analysis of current understanding in the IWG agencies and comparison with the above international standards, in the final analysis, the following specific principles/concepts were finally selected for developing the ECB Accountability Framework:

1. Leadership
2. Planning, Monitoring & Project Design
3. Non-Discrimination and Needs-based Response
4. Participation
5. Transparency
6. Learning and Evaluation
7. Beneficiary Feedback & Complaints Mechanism
8. Staff Competence and HR Management.

In Table 2 of Annex 7, the consultants have tried to capture a working definition of key principles/standards which an overwhelming majority of the interlocutors and literature suggested as vital to any credible humanitarian accountability framework, and analysed the current practices in the four agencies which actively participated in the field work.

The following paragraphs describe some of the above principles/concepts as understood and practiced in different agencies.

2.1.1 Participation

Community participation is a stated principle in all agencies¹⁰. Beneficiary targeting and project activity selection are most frequently carried out by community-level committees organised through local government, agency project or partner staff. Agencies recognise that the ‘quality’ of community-level committees varies, and all agencies verify beneficiary lists before project activities are implemented; but systems to monitor or audit committees were not apparent¹¹.

“We discuss and consult, but then we decide what is best for them”.

One IWG Agency staff in Northern Uganda

There were varying opinions concerning how well project activities addressed community-prioritised needs. Constraints cited were insufficient funds to address all stated needs, and activity selection driven by agency funding, skills and competencies. One agency staff in Uganda stated that they spend a lot of time articulating their approaches to participation during preparation of proposals for donors, but very little of that can be actually applied on the ground during implementation as staff are under continuous pressure to meet deadlines of implementation. One group felt that their project activities were driven by donor resources and “imposed” on beneficiaries. While some agencies monitor the changing needs during project implementation, respondents were generally in agreement that donor constraints make it difficult to change activities after a project implementation begins.

Box 1: Participation in WVI Tsunami Response in Sri Lanka¹²

To better promote accountability to beneficiaries in the Tsunami Response in Sri Lanka, a Humanitarian Accountability Team (HAT), separate from Operations and Programmes/ DME was set up. HAT reported directly to senior management (Programme Director) and was empowered to represent stakeholder (beneficiary) perspectives up to this level, including participation on the senior management team forums. Management of technical sectors such as shelter, child protection etc was done through an operations department that focused on implementation and technical management of projects and activities. HAT complimented this by focusing on community engagement, liaison with other parties (e.g. NGOs and Government) and monitoring the wider context within communities through tools like Local capacities for Peace (LCP). The lessons learnt were:

- Having a dedicated humanitarian accountability function enabled staff to retain a focus on beneficiary;
- Having a community engagement function that is field based and empowered to represent community perspectives meant that rather than only flagging problems, solutions could also be tabled to senior management at the same time. This greatly facilitated the speed and effectiveness of decision-making;
- Having a dedicated humanitarian accountability function in field offices through Stakeholder Representatives helped to reduce/ deter corruption as community complaints may uncover this;

¹⁰ Stated, for example, in the following documents: CARE Programming Principles; CRS ProPack (project design & proposal guidelines), Save the Children-US MOS and World Vision LEAP (Learning through Evaluation with Accountability and Planning).

¹¹ One respondent described an Umbrella CBO that monitored all other CBOs involved in their project, but it was not clear if this monitoring included beneficiary accountability.

¹² Source: World Vision, Why Do Accountability – A Business Case from Sri Lanka.

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- During emergency responses, engineers and technical specialists tend to consult with communities less well than those with specific skills and HAT provided a mechanism for staff to develop and use a specialisation in working with communities.

All respondents said that community committees participated in project management, but the decision-making authority of these communities varied considerably. There was also considerable variation in community participation in monitoring: from no participation, through participatory data collection, to beneficiaries conducting their own impact assessments. One concern of note cited by a respondent was whether or not project M&E indicators were understood by communities.

A final question posed to respondents concerned what would be required to provide local actors with greater control of project resources (including cash transfers that allow individual households to determine how ‘entitlements’ will be spent). While some were skeptical of communities’ ability to manage project resources on their own, others said success of such a response would require considerable capacity building and depend on the strength and legitimacy of government.

2.1.2 Transparency

In the countries visited, most emergency programmes were implemented in areas where ECB2 agencies had previously (or concurrently) implemented development projects; therefore, no additional information about the agency was provided to beneficiaries as part of the emergency response. Information concerning targeting criteria, project plans and entitlements was made available to beneficiaries through community-committees or local government partners. Entitlement information is also displayed or posted during distributions.

Project progress reports, monitoring data and exit strategies – if made publicly available – were disseminated through committees or local government / partners, but this practice was spotty at best. When questioned why such information was not systematically made available, most respondents claimed they simply hadn’t thought about doing it. Further probing revealed that field staff can readily identify methods to make information available to illiterate populations – if their agency required them to do so.

Box 2: Good practices in Transparency:

In Uganda, SCF, World Vision and CARE use quarterly meetings with local authorities, political leaders and community leaders as a platform to share all relevant information about their work and programme plans. The participants get opportunity to raise issues and provide feedback to the agencies. Feedback from these meetings is taken on board by SCF in its planning process. SCF also shares its evaluation findings with this forum (done last year, following an evaluation).

In Uganda, World Vision carries out a self-review and peer review of its programme every three years during which feedback from communities, local authorities and partners are systematically sought. The results of the review are then shared with these interlocutors. Similarly when assessments are conducted by WVI, findings are first shared with the communities and their feedback obtained, although at this stage this is done only for development programmes. Earlier this year, WVI conducted an evaluation of their HEA programme in Uganda and the M & E Officer is now currently in discussion with the community on how

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best to share the evaluation findings with them. It is however understood that such practices are not uniform in all the countries.

Financial information made publicly available varies from none to only direct costs of specific interventions. The latter is generally provided as part of a project agreement signed by the community-committees and the agency (and sometimes also local government officials). Unlike progress reports or monitoring data, lack of publicly available budget information and expenditure reports is not simply an oversight. Most staff (many of whom have never seen their own project budget) did not immediately feel comfortable with the idea of such public disclosure; some wondered why it would be important for beneficiaries to have such information. Fears were expressed that full disclosure could lead to unwelcome jockeying by dominant individuals and groups within the community for project resources, affecting the agency's ability to provide a needs-based response based on impartiality and neutrality. Most felt that communities would need a considerable amount of contextual information to correctly interpret/ understand financial information, if these were made publicly available.

2.1.3 Evaluation, Learning and Continual Improvement

Most agencies are currently taking steps to ensure routine evaluation of 'large' emergency projects, and conduct after-action reviews and lessons learned workshops for all responses. Evaluation of the small or recurrent responses (e.g. flooding in Bolivia and drought in Malawi), however, is still not a standard practice. Moreover, systems to publicly disseminate evaluation reports or ensure these reports feed back into improved practices are also lacking.

In Uganda, CRS has a monthly reporting system, but no annual review or report mechanism for the country programme. Project reviews/evaluations are carried out depending on donor requirements. An end-of-project evaluation was carried out in November 2005 which found that interactions with partners were weak. Staff said that they are working on steps to address this shortcoming in their programme.

Box 3: CARE's Strategic Impact Initiative

CARE International has in recent years introduced a learning tool called the Strategic Impact Inquiry (SII). Specific thematic focus (like women's empowerment) is chosen every year for global research through which CARE hopes to deepen a culture of learning and critical inquiry on issues related to accountability, analysis and impact.

Although SII has a very limited focus and does not cover principles which an accountability framework ought to include, its findings are reported back to the senior management and to the governing bodies of CARE, and the learning fed back into annual planning process at country level. CARE's SII does obtain beneficiary and partners' feedback. It is weak on accountability to beneficiaries and partners – CARE listens to the latter but does not get back to them with a report on what actions CARE will take on the beneficiaries/ partners' feedback.

2.1.4 Beneficiary Feedback and Complaints Mechanism

None of the respondents were aware of a “formal” beneficiary complaints mechanism within their agency. While discussions were already underway to create a formal feedback mechanism in some agencies, all currently implemented some elements of a system. For example, Save the Children (Bolivia) has a policy to respond in writing to all complaints. World Vision carries out a self-review and peer review of its programme every three years during which feedback from communities, local authorities and partners are systematically sought; the results of the review are then shared with these interlocutors. The most common means for beneficiaries to lodge complaints concerning a project or agency practice is through community-committees (but as mentioned earlier, there was no apparent practice of monitoring committee accountability to their constituents). In food distribution projects, the practice of post-distribution use and utilisation or satisfaction surveys is common.

All the interlocutors thought that having a formal system for systematic feedback and complaints is a good idea, although admittedly, most agencies find it difficult to take concrete steps to put in place such a mechanism. It is to be noted that of all the principles and standards in humanitarian action, this (beneficiary feedback and complaints) is the hardest to implement in a credible way. In a relationship of powerlessness (vis-à-vis the humanitarian agencies) and in the culture of silence which most of the communities needing humanitarian response are steeped in, expecting beneficiaries to complain just because there is a mechanism to lodge a complaint is unrealistic. Any complaints mechanism has to be backed by adequate education and empowerment process. Otherwise agencies will only hear only what is convenient for them to hear.

2.1.5 Staff Competence and HR Practices

Most staff felt that their basic emergency response competencies were well defined in their job descriptions. Responses varied widely to questions concerning staff awareness of their “accountability responsibilities”, mainly due to the wide variation in understanding of accountability.

One Country Director mentioned that while he is responsible for submitting various proposals and reports to his managers in the HQ, accountability to beneficiaries is not something he or his managers have ever demanded of the programme. He feels over-stretched by the current demands on his time, and hence he has no time to keep abreast of the ECB or Accountability initiatives his HQ is undertaking.

Box 4: CRS Performance Management System focusing on Quality

CRS has a comprehensive performance management system that has five parts: Performance Planning, Development, Coaching, Assessment, and Rewards and Recognition. The CRS performance management system emphasises on Values-Based Behaviors expected from its staff. By simplifying the paperwork for planning and assessment, the intent is to increase the quality of coaching, mentoring and performance feedback in CRS. With greater understanding of strengths and weaknesses of employees, better decisions will be made regarding the choices of developmental activities (formal training, job transfer or change, temporary duty assignment, special study) and job placements.

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While the system is followed in the field offices methodically, interviews with staff indicate that more often than not, the appraisal system is seen as another piece of paper work to be completed every year. Staff aver that it is highly task-focused, and generally not used as an effective learning and development tool.

Most of the organisations have invested in building staff capacity over the past few years on various quality tools and use of international standards like Sphere, RCRC code of conduct etc. The recently developed GEG has been rolled out in many countries and is being widely used by field staff in Uganda. A common early response to any desired change in humanitarian assistance practice has been to provide staff training, but it is argued by many interlocutors that training without adequate support systems ends up as information provision, and does not get internalised enough to cause changes in practices. Two critical elements that a support system needs to include are generally missing in rolling out of various quality standards in humanitarian agencies:

- (a) Clear picture of how all the various initiatives introduced from time to time relate to each other – in the absence of this, field offices have a tendency to dismiss a new initiative coming from the HQ as ‘yet another one of those old wine in a new bottle’.
- (b) Adequate management support and measurement of staff performance at all levels to these standards. Very often, policies of accountability are developed and disseminated down the line, without appropriate support and monitoring mechanism, wishing that someone somewhere will implement them.

2.1.6 Project Design

Principles such as vulnerability reduction, increased disaster response capacity and sustainability are stated in most agency project design manuals and guidelines, but not systematically practiced. Asked what/who influences the choice of projects and how these are implemented, several staff unequivocally stated that donors’ choices and proposal requirements determine what is implemented. Several agencies are attempting to ensure these principles are more systematically implemented by placing greater emphasis on linking relief, rehabilitation and development programmes.

“Success is measured in funding terms by the management. Hence quality is not a central issue yet”.

A senior manager at an Agency HQ

2.1.7 Leadership

As one respondent stated during the field visits, “when accountability becomes important for the agency, my staff and I will make time to address it”. During the field work and interviews, an overwhelming majority of respondents replied in the negative to the

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Box 4: Oxfam Trustees make Humanitarian Accountability a specific focus¹³:

Over the years, various departments within Oxfam invested in developing standards of performance in the areas like trading, fundraising etc. In the past few years, the humanitarian department has also initiated processes to develop standards. However, it is only recently that trustees have explicitly stated that they would like to see the organisation develop robust mechanisms for accountability to beneficiaries. There is now a Programme Review Committee which looks into Quality and Accountability issues. Oxfam has now developed a corporate Accountability Plan which joins up all the various departmental accountability commitments/standards. Work is now in progress to develop reporting mechanisms for the trustees to be able to track how Oxfam is doing in its accountability to various stakeholders.

Oxfam now has appointed in each region a senior Regional Programme Manager with specific remit on Quality and Accountability.

question whether or not their Directors or Trustees require country offices (COs) or Regional Directors to submit periodic reports on their accountability to beneficiaries. Most said that they were never told that this was a performance requirement and believed that the trustees do not ask the question as to how the organisation was holding itself to account to its beneficiaries. There was an assumption that since the organisation's *raison detre* is the poor and vulnerable, "we are good at this".

If the leadership right from the level of trustees through the senior Directors to the country office do not show serious commitment of time and resources for humanitarian accountability and quality, the frontline staff have no reason to make time for these in the middle of various other priorities, especially during an emergency response. Without the leadership spelling out clearly and demonstrating what value the organisation places on humanitarian accountability to beneficiaries, no amount of policy-making or training will convert wishful thinking into reality.

Constraints to humanitarian accountability identified at the ECB2 New York Meeting in 2005¹⁴ were overworked staff with little time and new-initiative-fatigue-syndrome – the proliferation of internal and external quality and accountability guidelines and standards over the years. These same constraints were mentioned frequently during the current fieldwork. Addressing these constraints will require more than a streamlined accountability framework or improved communications between the individuals spearheading humanitarian accountability within the IWG agencies and field staff.

2.2 Conclusions on Humanitarian Accountability in the ECB Agencies:

1. Systems and tools already exist internally within the IWG agencies or in the wider sector (like Sphere, HAP, GAP, etc) to promote beneficiary accountability¹⁵. Several

¹³ Based on telephone interviews with J. Saunders and Yo Winder, Oxfam.

¹⁴ ECB2 New York Meeting minutes, September 8-9th, 2005.

¹⁵ For example, the Scorecard process and tool used by the I-LIFE project in Malawi to generate information through dialogue in a participatory forum. It is used to positively influence the quality, effectiveness and accountability with which services are provided by emphasizing community developed benchmarks and indicators; joint monitoring and decision-making; and mutual dialogue between users and providers. [The Scorecard Toolkit: A Generic Guide for

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agencies have introduced some elements of the internationally recognised standards. However, the application and compliance of these are not systematic. Focus should be on improving the quality of them, and devising ways to make more robust use of them, rather than on development of new systems and tools.

2. The proliferation of standards and accountability initiatives, internally and externally, causes confusion and frustration at the operational level as each initiative is seen unrelated to the existing ones, causing staff to feel overwhelmed, and with little added value in enhancing quality and accountability.

3. The current focus of quality and accountability in the ECB agencies has predominantly been on input-output tracking through financial audits, DME, Sphere standards¹⁶, etc.

“Although we have DME staff in the COs, their conventional training and focus has been on development programmes, and hence we struggle to adapt our M & E systems to emergencies most of the time”.

A senior Manager at an Agency HQ

Only recently have agencies begun to focus on outcome/impact and organisational processes. DME tools which are extensively used in all the organisations are heavily ‘proposal-oriented’.

4. An Accountability framework needs to be built on existing tools and standards (Sphere, Do No Harm, RCRC Code, GEG, HAP, internal mechanisms etc) already known or in use, no matter how patchy, in the organisations, and it needs to show how all the various elements relate to each other, rather than provide new entirely set of standards and tools.

5. ECB members now use different definitions for concepts like consultation, participation, partnership etc., which blocks inter-agency learning, communication and developing consistent quality criteria. A common Accountability framework will provide a common language when designing, implementing, monitoring and evaluating emergency interventions as part of a larger coalition of humanitarian agencies¹⁷.

6. Compliance of Agreed Standards needs to be driven by top management, and they need to model behaviour which ensures that rhetoric and reality are consistent¹⁸. Without commitment and leadership of the board and senior management of an organisation, humanitarian accountability will have little chance of getting entrenched in the organisational systems and processes, and any reforms will only be patchy and temporary depending on the willingness and interest of individuals managing particular projects. *“To be effective, humanitarian accountability must be integrated into everything an*

Implementing the Scorecard Process to Improve Quality of Services (participation, accountability, responsibility, informed decision-making); CARE Malawi.]

¹⁶ Although conceptually, Sphere offers higher level of Q & A scope, most agencies have made limited use of Sphere to monitor technical specifications of services delivered.

¹⁷ CARE International Accountability & Standards Benchmarks for Humanitarian Responses, *Draft ver.16 January 2007*

¹⁸ The minimum steps SPHERE recommends so that individuals on the ground have support to apply standards are: 1) Public commitment by an organisation that they adhere to standards, 2) Leaders within an organisation show commitment that they know the standards, incorporate them into policies and appoint a focal point for quality and accountability, 3) Staff trained to use SPHERE standards, and with specific competencies before they go into an emergency, and 4) Plus incorporation of standards into job descriptions and performance appraisal systems.

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organisation does, from its finances, to its operations, to its human resources. Commitment therefore also needs to cut across departments. If an INGO makes the decision to strengthen its accountability to beneficiaries, for example, this might require the fundraising teams changing how they report to donors, finance departments learning how to communicate financial information to people that are illiterate, and campaign teams developing mechanisms that give the poor and marginalised a direct voice in international advocacy¹⁹”.

Part II:

Towards an ECB Humanitarian Accountability Framework

(In this part, attempt has been made to define a desired state (benchmarks) against the eight principles which were identified in the previous part, and specify indicators against each benchmark. The indicators have been defined in a way that gives flexibility for individual agencies to design their own mechanisms for delivering against those indicators. The concluding section of this part makes recommendations on possible compliance measurement and review mechanism, as well as how this framework can be potentially used by individual agencies to adopt or link up with various international standards (like ISO 9000, HAP2007, etc).

It should be noted here that this is a framework, not a new set of standards. Existing standards like Sphere, HAP, GAP etc., have been used to develop this framework which should provide a roadmap for the IWG agencies to integrate various humanitarian accountability standards in their business processes.)

Section 3: Establishing the Benchmarks (desired state)

3.1 Definition of Accountability Principles²⁰ and Indicators:

The following definitions have been developed against the eight principles selected in section 2.1 which are based on current practices within the agencies studied and understanding of various tools and concepts linked to different international standards. In order to provide clarity and consistency in the use of the principles (so as to ensure a

¹⁹ BOND, A BOND Approach to Quality in Non-Governmental Organisations: Putting Beneficiaries First, 2006

²⁰ These can also be called 'Benchmarks' (HAP uses this definition)

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common language), these definitions have been made outcome-driven, and against each definition, set of indicators have been provided.

1. Leadership on Accountability: The senior leadership (Directors and Trustees) sets has a clear statement of humanitarian accountability that is publicly available and ensures that adequate mechanisms are in place to measure compliance with agreed Standards (*HAP Benchmarks 1 & 2*).

Indicators:

- 1) Public commitment by an organisation that they adhere to specific standards²¹;
- 2) Leaders within the organisation know the standards the organisation is committed to, incorporate them into policies and appoint a focal point for quality and accountability;
- 3) The organisation has a plan of action to implement its humanitarian accountability statement and to monitor its compliance;
- 4) Directors/CEOs report to governing board on progress regarding implementation of central humanitarian AIM standards;
- 5) The Agency has well-established mechanisms for timely and adequate resource deployments during emergencies (clearly defined decision making mechanisms for rapid response exist, with clear lines of authority and accountability);
- 6) Performance management of senior managers includes humanitarian AIM standards.

2. Planning, Monitoring & Project Design: Staff systematically use outcome-oriented programme quality improvement tools, including various relevant technical standards with clear statement of outcomes and impact for all humanitarian programmes (*Sphere Common Standards 3, 4 & 5*).

Indicators:

- 1) Staff systematically use result-focused project planning and monitoring tools.
- 2) Periodic internal review and mechanisms for reporting on outcome and impact exist.

3. Principle of non-discrimination and response based on needs alone: The Agency's humanitarian response is solely based *systematic assessment* of needs and *in proportion* to the needs (*principle 2 of RCRC code; Humanitarian Principles under HAP standards; Sphere Common Standards 2, 3, 4*).

Indicators:

- 1) Staff and partners understand and practice the Non-discrimination principle of RCRC code and associated principles of impartiality and neutrality in all humanitarian operations;
- 2) Systematic needs assessments carried out to determine humanitarian response, and the response is in proportion to the need and capacity of the organisation;
- 3) The assessments take into account local capacities and institutions, and coping mechanisms (*Sphere Common Standards 2*), and the Organisation's response is coordinated with other relevant agencies.
- 4) Organisational self-interest does not take precedence over real humanitarian needs.

²¹ Which could be internal (organisation-specific) and/or international (sector-specific) like HAP-I standards, InterAction PVO standards, Sphere etc.

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4. Participation: The Agency has established systems that enable stakeholders²² to input into decisions that affect them, including enabling stakeholders' input into the broader humanitarian policies and strategies (not just confined to engagement on operational issues).

Indicators:

- 1) Beneficiaries participation in needs assessments and in decision making on determining project activities and ensuring that they are based on priorities of the local community (*Sphere Common Standard 1; HAP Benchmark 3; TEC recommendation*);
- 2) Beneficiaries participate in project implementation, management & monitoring (*Sphere Common Standard 1 & 5; HAP Benchmark 3; Code of Conduct 7*);
- 3) Beneficiaries participate in evaluation and are made aware of evaluation findings (*Sphere Common Standard 1 & 6; HAP Benchmark 3; GAP*);
- 4) Involvement of local government & partners in assessments & implementation (*Sphere Common Standard 2*).
- 5) Build disaster response on local capacities and emergency projects are designed to increase disaster response capacity (*RCRC code, Principles 6, Sphere Common Standard 1; TEC recommendation*).

5. Beneficiary feedback and complaints mechanism: The Agency has a formal mechanism in place which ensures that the beneficiaries and local communities can provide feedback, seek and receive response for grievances and alleged harm, and hold the agency answerable to them for its humanitarian response (*Sphere common Standards 1; HAP Benchmark 5; GAP*).

Indicators:

- 1) Beneficiaries have ability to comment on all stages of project (*Sphere Common Standards 1*), and there is effective coordination and exchange of information among those affected by or involved in the disaster response (*Sphere common Standard 3*).
- 2) Information about agency structure, staff roles & responsibilities and contact information is publicly available (*HAP Benchmark 2*).
- 3) Systematic stakeholder surveys (beneficiaries, local communities including authorities, partner NGOs and other humanitarian agencies) conducted periodically and results acted upon and reported back to the beneficiaries (*TEC Recommendations*);
- 4) Formal mechanism in place for beneficiaries to lodge complaints (*Sphere common Standard 1; HAP Benchmark 5; GAP*);
- 5) Management oversight of complaints and community feedback loop (do you get back to the communities/ complainants about actions taken?)
- 6) Relationship with local stakeholders demonstrates that the agency respects local culture and custom (*RCRC Code 5*).

6. Transparency: makes relevant information publicly available in appropriate way which allows beneficiaries and local communities to monitor an organisation's activities and performance to be able to make informed decisions and choices about the organisation (*HAP Benchmark 2; Good Enough Guide Tool 1*).

²² There was a general consensus amongst the interlocutors interviewed during this exercise that agencies do well in terms of participation of stakeholders like staff, donors and other secondary stakeholders like domestic media etc., but are weak with respect to beneficiaries. Hence the emphasis in this framework is placed more on the beneficiaries than on other stakeholders.

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Indicators:

1. Information about the humanitarian programme of the organisation, project plans and specific activities publicly available (*HAP Benchmark 2; TEC recommendation*);
2. Information about needs assessment and targeting criteria, entitlements, project budget and financial plan summaries are publicly available (*Sphere common Standard, HAP Benchmark 2*);
3. Make public information about progress reports/monitoring data, including an explanation of gaps in meeting minimum standards (*Sphere Common Standard 3 & HAP Benchmark 2*);
4. Findings of external/internal reviews and evaluations are available publicly and in an appropriate format which is accessible to beneficiaries and local authorities (*GAP; TEC recommendation*).

7. Evaluation and Learning: The organisation demonstrates serious commitment to evaluation and reviews to measure its effectiveness and impact and uses the learning to continually develop its humanitarian quality and accountability systems (*Sphere Common standard 6, HAP benchmark 6*).

Indicators:

1. Beneficiaries participate in project evaluations (*Sphere Common Standard 1 & 6; HAP Benchmark 3; GAP*).
2. Independent real-time and end-of-project evaluation of all large scale emergency operations carried out;
3. Evaluation findings followed through by top management, with clear action plans based on evaluation recommendations (*HAP Benchmark 6; Quality Compas criteria L; Sphere Common Standard 6, GAP*).
4. Evaluation results are made publicly available in appropriate format for various stakeholders.

8. Staff Competence and HR Management in Emergencies: Staff are made aware of and trained in delivering their accountability obligations including accountability to beneficiaries, and are performance-managed to the quality and accountability standards adopted by the organisation.

Indicators:

1. Staff deployed for humanitarian operations have clear job descriptions, ToR, contracts, with accountability responsibilities clearly identified in the job descriptions (*Sphere Common Standard 8; People in Aid 3*);
2. Policies & practices that relate to staff recruitment & employment are documented and staff are familiar with them (*People in Aid 2 & 5*);
3. Staff provided with pre-posting briefing and orientation (*People in Aid 6*) - including Accountability standards/mechanism (*HAP Benchmark 4*), such as information disclosure (*GAP*) before they go into an emergency;
4. Specific competencies and behaviour expected of deployed staff clearly defined (*HAP Benchmark 4; Quality Compas criteria F*);
5. Continual staff training and orientation on humanitarian accountability and compliance exist (*HAP Benchmark 4; People in Aid 6*);
6. Managers held accountable for supporting staff and ensuring regular review of performance (*Sphere common Standard 8, HAP Benchmark 4; People in Aid 3*).

3.2 Compliance Mechanism: How Standards will be Measured and Reviewed:

As elaborated in part-I, several tools already exist internally within some of the IWG agencies or in the wider sector (like Sphere, HAP, GAP, etc) to promote beneficiary accountability²³ in a limited way. The critical element that is often weak is the will and mechanism to ensure that INGOs practise what they say. This requires three essential elements to be in place in an organisation:

- a) embedding the standards and quality tools in everyday business;
- b) measuring and demonstrating to the stakeholders how well the agency is doing; and
- c) learning and continuous improvement.

Some of the ECB agencies already use various mechanisms in this regard, mostly internal processes and tools. MOS, Internal Peer Review, MACO, Sphere review etc., are mechanisms through which staff in some of the agencies have got used to the concept of assessments of compliance to internal standards. Some agencies conduct systematic external/multi-agency evaluations of their humanitarian operations, others rely mostly on internal reviews. Although most of these tools are used specifically for development programmes, the consultants believe that some of these tools can be modified to integrate some of the core elements of the humanitarian accountability framework.

3.2.1 Recommendations on Compliance Measurement

R1: Having an internal mechanism for regular and systematic audit, self-review and evaluations is a ***minimum essential first-step*** towards an agency's humanitarian accountability obligations. A few of the ECB agencies will need to take this first step.

Rationale for the recommendation: If staff are not used to facing any internal review/audit and evaluations, it is unlikely that more complex mechanisms of compliance measurement like peer review or external certification will be taken up seriously.

R2: 2 levels of Compliance to the Accountability framework are recommended:

Level 1 (first step):

- a. Agencies to put in place systematic mechanisms for periodic self-audit review, internal peer review and external evaluations of their overall humanitarian programmes on compliance to the Quality standards, and the outcome of such processes need to be periodically reviewed by the highest level of leadership within the organisation.

²³ For example, the Scorecard process and tool used by the I-LIFE project in Malawi to generate information through dialogue in a participatory forum. It is used to positively influence the quality, effectiveness and accountability with which services are provided by emphasizing community developed benchmarks and indicators; joint monitoring and decision-making; and mutual dialogue between users and providers. [The Scorecard Toolkit: A Generic Guide for Implementing the Scorecard Process to Improve Quality of Services (participation, accountability, responsibility, informed decision-making); CARE Malawi.]

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- b. Agencies ***must*** make the findings of such reviews/audits/evaluations²⁴ publicly available in appropriate format to its stakeholders, especially to beneficiaries and local constituents.

Rationale for the recommendation: The top management ought to demonstrate that it values accountability, and recognises that in order to justify the agency's claim that it works for or represents the voices of the poor or disaster victims, it has to demonstrate its accountability to them. In brief, it is about moving away from the era of rhetoric and empty promises.

Level 2:

Option 1: ECB Peer Review:

ECB peer review conducted every 3 years against the 8 accountability principles outlined in this framework. Although ECB peer review need not necessarily lead to certification, a systematic and rigorous process of review and transparent communication with external stakeholders and peers on the outcome of the review could have the same validity and credibility in terms of accountability to stakeholders as any external certification.

Advantages:

- i. Process and methods can be tailored to be highly sensitive to the working context and the culture of the agencies (IWG agencies have broad similarity in their operating principles and structures particularly in relation to emergency response);*
- ii. Scope for greater inter-agency learning, exchange and tailored capacity building strategies than is the case now;*
- iii. IWG as a collective is a highly powerful group which can influence the entire sector to accept accountability more seriously.*
- iv. Being based on the IWG agencies own current commitments and promises, a peer pressure mechanism can ensure that internal stakeholders take their own commitments seriously.*

Disadvantages:

- i. External stakeholders may perceive of ECB agencies as an 'old boys club', unless the entire process is handled in a highly transparent way.*
- ii. IWG/ECB will need to develop, standardise and manage the peer review process.*

Option 2: External Certification:

HAP2007 Standards or ISO 9000 Certification²⁵ or similar international standards compliance. All external certification involve a pre-certification self-assessment followed by an external audit by the certification/accredited agency for the particular standard. Certification is usually given for a fixed period of time which is then reviewed at regular intervals.

Advantages:

- i. External audit verifies and certifies compliance which enhances credibility in the perception of external stakeholders.*

²⁴ All Evaluation terms of reference, for example, must indicate that the reports will be made public, except for information that may, if put in public domain, compromise staff security.

²⁵ There are over a dozen QMS and standards now available all over the world and some of these are being used by NGOs, besides business and governmental organisations. A brief overview of some of the key standards is provided in Annex 6.

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ii. Administration and management of the audit/certification is provided by an external agency.

Disadvantages:

i. Individual agencies may be skeptical of the external auditor's sensitivity to complex humanitarian contexts within which most of the emergency programme take place.

ii. Certification may be seen as a periodic event, rather than an ongoing process of developing and demonstrating quality and accountability, and this may lead to tick-the-boxes-syndrome.

3.2.2 The Self-Review/Peer Review Mechanism

The self-audit or peer review of the accountability framework needs to be used as a learning and continual improvement process; simultaneously it ought to have a quality measure which helps the organisation to objectively assess the progress it is making year on year.

The following rating systems may be used for assessing against each indicator:

No action yet on this indicator	0
Awareness and understanding developing	1
Concrete steps have been planned/initiated	2
Standards embedded and is continually improving	3
Excellence in the area already established	4

For example, review on the principle or stakeholder feedback and complaints mechanism of an office may look like this:

Standard/Principle/ Benchmark	Indicators²⁶	Observations/ Evidences seen during the review	Rating	Recommendation
Stakeholder feedback and complaints mechanism	Systematic stakeholder surveys conducted periodically and results acted upon and reported back to beneficiaries		2	Global summary & analysis of stakeholder feedback and actions taken to be presented to the trustees annually.
	Formal mechanism in place for beneficiaries to lodge complaints		1	Develop & launch a complaints mechanism in the next 9 months.

²⁶ Specific questions against each indicator may be worked out during development of manual for implementation, following agreement by the IWG agencies on the Accountability Framework.

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	Management oversight of complaints and community feedback loop		1	International Directors asked to submit status report annually to trustees.
	Relationship with local stakeholders demonstrates that the agency respects local culture and custom		3	

When comparison is made over a time period, the ratings will help track whether or not the agency is making progress on the benchmark.

In undertaking review of complex humanitarian situations, understanding of how the accountability principles can be applied in a given context will be critical. During the initial stages of a crisis when the situation is highly unstable and populations are in a state

“In this area, there are some villages which have been so corrupted by aid that people demand money even when you invite them to come to community meetings”.
One Agency staff in Gulu

of trauma, participation may be unrealistic; or full compliance with technical standards for shelter may lead to providing housing to refugees which are well above standards of the host populations, thus creating

tensions between the communities. Likewise there may be situations where because of external circumstances, all the standards defined in the framework are difficult to meet. The review needs to take these into account and record the justifications for ‘poor’ compliance.

3.3 Recommendations on Implementation Strategy for ECB:

IWG Leadership:

R3: The discussions and debates on this draft framework within the ECB agencies need to take place at country level within each agency as well as at the level of the senior-most leadership of IWG to work out an inter-agency mechanism for rolling out the framework.

Rationale for the Recommendation: While senior leadership needs to have an oversight and drive it, the field needs to own the Accountability framework for it to be effective.

R4: Of the eight principles defined in the framework, the absolute minimum for initiating implementation of the framework are the principles²⁷ 1, 5 and 6, (i.e., **leadership on accountability, beneficiary feedback & complaints mechanism and transparency**) and it is in these areas that the collective leadership of IWG needs to drive the Accountability agenda in the initial stages.

²⁷ As described in part-I, many of the principles like participation, outcome-oriented project design etc., are already being practised to varying degrees by different agencies, although in most cases, they need greater systematisation.

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Rationale for the Recommendation: The top management ought to demonstrate that it values accountability, and in order to justify the agency's claim that it works for or represents the voices of the poor or disaster victims, it has to demonstrate its accountability to them through being seriously transparent and by giving beneficiaries a voice.

- R5: In large agencies with multi-country programmes, the implementation of the framework may be phased over a 3-5 year time-frame in order to allow scaling up of management capacity and organisational learning and adaptation to take place. However, the critical element under any circumstances has to be that the senior leadership keeps an oversight of the roll out process and provides an overall steer through an organisation-wide implementation plan, rather than leave the implementation to the predilections and choices of individual country managers²⁸.

Rationale for the Recommendation: Implementation of the AF will demand changes in behaviour, attitudes and retraining for Agency staff and management, and hence needs a longer time-frame and a coherent implementation plan.

- R6: Several of the IWG agencies are federations of independent organisations like CARE, World Vision, Save the Children etc., and implementation of a common accountability framework globally may be a complicated process. Hence it is recommended that implementation is phased, starting with 2-3 countries, and gradually scaling up to include all countries with major humanitarian programme.

Rationale for the Recommendation: Implementation of the AF will demand changes in behaviour, attitudes and retraining for Agency staff and management, and hence needs a longer time-frame and a coherent implementation plan.

- R7: ECB needs to clarify in its internal and external communication that this Framework is not a new set of standards (like HAP, Sphere or ISO etc), but incorporates various elements of these already-existing standards. Individual agencies may, when they are ready, opt for certification under any of the external standards.

Rationale for the Recommendation: This framework summarises key elements of the already existing external initiatives in a language the ECB members find easy to relate to and this may help the members along the road to external certification should they decide to go for one in future.

- R8: Develop detailed implementation plan for peer review process for the next 3 years.

²⁸ It has been commented by various interlocutors that getting the senior-most leadership of the organisations to engage on this initiative may be unrealistic, and a better option would be for the middle managers to work with individual countries to begin the roll out process. This reviewer dogmatically believes that if the trustees and senior directors do not consider accountability to beneficiaries as part of the core business of the organisation and are not prepared to invest time and resources, any heroic initiative by a few countries or individuals within the countries can at best be ephemeral and inconsequential in the long run.

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Rationale for the Recommendation: Formally planned process of peer review with medium term implementation plan will give the agencies to carry out self-reviews prior to peer reviews.

Individual Agencies:

R9: Individual agencies need to have a focal point or champion on Quality and Accountability at the senior management level whose job would be to ensure that the action plans on Q & A are integrated and monitored at all levels.

Rationale for the Recommendation: Major organisational changes involving behaviour and attitudes require champion(s).

R10: Generally, the field staff are unaware of the work done through ECB forum, and except for the GEG in some countries, staff have not fully engaged in the ECB initiatives. Appropriate dissemination and consultation process needs to precede any step towards implementation of this framework.

Rationale for the Recommendation: Weak communication and dissemination on ECB initiatives in the field was noted during the field work in all the three countries.

R11: Agencies need to review their existing self-review/audit mechanisms (like MOS in Save, MACO in CARE) and integrate elements of the humanitarian accountability framework into these.

Rationale for the Recommendation: Creating entirely new systems and mechanisms needs to be avoided wherever existing ones can be adapted to integrate the AF.

R12: Individual agencies need to decide if and when they are ready for peer review and / or external certification.

3.4 Concluding Remarks – Can the cost be justified?

Being accountable does not come without costs. The measures recommended in the above framework will involve significant investment within the organisations. However, more than financial costs, these will demand significant changes to the ways of working, and hence training, communication and strong leadership will be vital.

Moreover, accountability framework is about **standards of quality** for which the agency is **accountable** to its stakeholders. In other words, it is about the **core business** of the organisation – delivering good quality humanitarian response and being held to account for it to the people the response is meant for. AF therefore must not be seen as additional to what the organisations are currently doing – the fact that agencies have got away with not being fully accountable to the beneficiaries for decades can not be any justification for balking at it if it requires serious investment. About fifteen or so years ago, humanitarian agencies did not generally use many of the current planning and

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management tools like strategic planning, business planning, logframe, etc., until another stakeholder, the donors, started to push for these. Agencies made serious investments in these, and no one asked ‘will it be cost-effective’.

It is not-too-late to take accountability to its next logical level – to the beneficiaries.